



NOVEMBER 2022 NEWSLETTER

IMPORTANT DATES:

November 2

DJA Webinar
Program Integrity, Audits and
Program Reviews
11:00 a.m. CST

November 6

Turn Clocks Back

November 8

Get out and Vote!

November 11

Veteran's Day



November 24 & 25

Thanksgiving - DJA Closed



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October has passed and so has the FISAP submission deadline. However, November is an equally busy month and we still have a few more deadlines approaching before the end of 2022. On the 11th we will honor and celebrate all the veterans who have served for our country. Please note that Veteran's Day will result in the closure of all government offices and may have an impact on your Title IV processing. Please also note the upcoming deadline to for TG Confirmation of December 14, 2022.

Did you know DJA has created our own financial aid management software called New Leaf? Our program is web-based and created in-house by our own DJA financial aid experts. It accurately calculates in real time, the eligibility for Federal loans, Pell grants and other Campus-based awards. Our team has worked tirelessly to establish a system that dives deep into the compliance components and intricate situations that unique students provide. Many of our DJA clients have been utilizing New Leaf and feedback has been incredible! Debora Murray, Director of Financial Aid for The Salon Professional Academy states:

"The ease of use of the New Leaf system is more than I ever dreamed it would be. With the preset budgets and back-end build that you have set up, it leaves little room for error in awarding. I have been doing financial aid for over 25 years, and this is the best system I have ever used. My compliments to your team and their hard work to develop a system that works well, saves time, and offers accuracy beyond expectation. I love New Leaf – and I love DJA!

Our Director of Client Services, Kristi Cole, would love to chat with your school on how New Leaf can improve your financial aid processing. She can be reached at kcole@gotodja.com or by phone at 1-800-242-0977.

Lastly, in celebration of the Thanksgiving Holiday and so our team can spend time with their families, DJA will be closed on Thursday, November 25th and Friday November 26th for the Thanksgiving Holiday. We wish each and every one of you a Happy Thanksgiving!

*Thank you and until next time, stay safe!
Deborah John, President*



IN THE NEWS: UPDATE ON PRESIDENT BIDEN'S STUDENT LOAN DEBT RELIEF PLAN

Last month we shared the various legal challenges President Biden's Student Loan Debt Relief Plan faced. On October 21, 2022, a U.S. appeals court temporarily blocked Biden's plan to cancel billions of dollars in student loan debt. "The 8th U.S. Circuit Court of Appeals granted the states' emergency petition to freeze the loan forgiveness plan until the court rules on their request for a longer-term injunction while Thursday's decision against the states is being appealed."

<https://www.cnbc.com/2022/10/21/us-appeals-court-temporarily-blocks-bidens-student-loan-forgiveness-plan.html>

Despite the recent block on the debt relief plan, borrowers are encouraged to still complete their applications. The application for student loan cancellation was opened on October 17th. The form is available in desktop and mobile versions, as well as English and Spanish. Borrowers will need to provide their name, date of birth, Social Security number, email, and phone number, and self-certify their income through a checkbox feature in the application.

Borrowers can apply for cancellation through Federal Student Aid's (FSA) website: <https://studentaid.gov/debt-relief/application>.

Education Secretary Miguel Cardona was with Biden during the announcement and told reporters that ED is working on pathways to provide relief to borrowers with privately held Federal Family Education Loan (FFEL) Program loans. ED in a recent FAQ [altered](#) the eligibility requirements for those borrowers.

Note: The Office of Inspector General released an announcement last week (October 27th) encouraging student loan borrowers to stay alert and avoid falling victim to student loan forgiveness and debt relief scams. This student debt loan cancellation program, as well as the current pause on loan payments, are an opportunity for hackers to create false emails to entice borrowers to utilize their third-party services for assistance with the student debt loan cancellation. To be safe, students should only utilize the link above to complete their loan cancellation application and this is a FREE program where third-party assistance is not needed. The announcement from the OIG offers these three simple steps to protect borrowers:

1. Beware of phone calls, emails, texts, or social media messages from anyone claiming that they can help you obtain student loan forgiveness or help move your application through the process. The same goes for unsolicited offers to consolidate or refinance your loans for a fee. There's nothing these companies can do that you can't do for yourself—for free.
2. Be suspicious of any unsolicited email, text, or call that asks for your personal information, particularly your FSA ID. Don't share your FSA ID or other password with anyone—even people who say they work at your alma mater or your student loan servicing company.
3. Be suspicious of emails with links or attachments. Don't click on links or attachments embedded in emails. You can hover your mouse over links to see where they are directing you. Also look for



misspellings in the email address, body of the message, or in links. A common scam tactic is to use addresses that are almost, but not quite, identical to legitimate ones.

[Attention Student Borrowers: Take Actions to Protect Yourself from Student Loan Forgiveness Scams \(ed.gov\)](#)

IN THE NEWS: U.S. DEPARTMENT OF EDUCATION UNVEILS FINAL RULES ON 90/10 AND OTHER ISSUES

On October 27th, the U.S. Department of Education announced the final regulations in regard to the 90/10 rule, Prison Education Programs, and new accountability rules for those undergoing a change in ownership. The Department press release states that the final rules will “better protect veterans and service members from predatory recruitment practices, implement access to Pell Grants for incarcerated students in high-quality prison education programs, and increase accountability when colleges and universities change ownership.”

These regulations establish requirements for Federal Pell Grants for prison education programs (PEPs) to implement new statutory provisions to establish Pell Grant eligibility for a confined or incarcerated individual enrolled in a PEP to implement the statutory change in the Consolidated Appropriations Act, 2021.

Second, the regulations amend the Title IV Revenue and Non-Federal Education Assistance Funds requirements (referred to as “90/10” or the “90/10 Rule”) to implement the statutory change in the American Rescue Plan Act of 2021. The Department is also amending the requirements for which non-Federal funds can be counted when determining compliance with the 90/10 rule to align allowable non-Federal revenue more closely with statutory intent.

Finally, the Department is amending regulations to clarify the process for consideration of changes in ownership and control, to promote compliance with the Higher Education Act of 1965, as amended, and related regulations and reduce risk for students and taxpayers, as well as institutions contemplating or undergoing such a change. The regulations are effective July 1, 2023, and the 90/10 regulations will apply to institutional fiscal years beginning on or after January 1, 2023, consistent with the effective date of the statutory changes to the 90/10 calculation.

90/10 Rule

These regulations implement an important change made by the American Rescue Plan, which was signed into law by President Biden in 2021. That law closed a longstanding loophole in the Higher Education Act that allowed for-profit colleges to recruit veterans and service members. The statute requires for-profit colleges to prove their value in the private market. These colleges must obtain 10 percent of their revenue from non-federal sources, but the statute allowed these colleges to count federal dollars outside of the student aid system—such as G.I. Bill benefits—toward their private market test.

The American Rescue Plan closed this loophole. The revised definition means institutions will no longer be able to count money from veteran and service member benefits toward that 10 percent revenue requirement. The Department achieved consensus in negotiating these changes, and the final regulations state that:



- Proprietary institutions include in their 90/10 calculation all Federal education assistance, not just Federal financial aid, that goes toward tuition, fees, and other institutional charges, with the exception of funds from a Federal source that go directly to a student and are specifically designated to cover expenses other than tuition, fees, and other institutional charges, such as housing. The Department will publish a list of the Federal education assistance programs that are counted in the 90 percent revenue test in the Federal Register and update the list as needed. This change ensures that for-profit institutions are not overly reliant on taxpayer funds and are able to pass a simple market test to generate at least 10 percent of their revenue from other sources.
- Institutions cannot delay the draw-down of funds from the financial aid programs (i.e., Title IV programs) past the end of the fiscal year to reduce the amount of Federal aid reported in a fiscal year.
- Institutions can only count actual revenue from principal payments by the borrowers that are made on loans and alternative-financing arrangements, such as income-share agreements (ISAs). Institutions also cannot sell these student obligations and count those proceeds as qualifying payments for tuition and fees for the 90/10 revenue calculation. The final regulations further clarify the terms ISAs must meet in order to be counted and makes other changes to ensure that private loans and ISAs are treated consistently. For-profit colleges may only include funds generated from activities conducted by the institution that are necessary for the education and training of its students and must be related directly to services performed by students. Non-federal revenue may also include revenue generated by programs that do not participate in Title IV programs, as long as they meet certain criteria to ensure value to students.
- For-profit colleges that fail the 90/10 rule are required to notify the Department and the institution's students in a timely manner

Prison Education Programs

Enrollment in postsecondary education programs is proven to reduce incarcerated individuals' risk of returning to prison by 28%, and reductions in recidivism also imply improvements in public safety. Congress recently established eligibility for Pell Grants for incarcerated individuals enrolled in qualifying prison education programs, effective July 1, 2023. In the interim, the Department has expanded its Second Chance Pell Experimental Sites Initiative to serve incarcerated individuals in nearly every state. The Department has also announced that incarcerated individuals are eligible for FSA's "[Fresh Start](#)" initiative, which will help borrowers with defaulted loans access low monthly payments based on their income and allow them to access Pell Grants to help them resume their educational journey.

- Incarcerated students who are enrolled in a eligible prison education program may access Pell Grants, up to the cost of attendance, for enrollment in public or nonprofit postsecondary educational programs while in a correctional facility.
- Accrediting agencies and the Department must approve an institution's first prison education program at the first two correctional facilities where the institution operates such programs. The accrediting agency reviews will include a site visit and a thorough review to ensure that the prison education program meets the same standards as substantially similar programs that are not prison education programs offered by the institution



Change in Ownership

A growing number of colleges and universities undergo often-complex changes in ownership transactions. In recent years, the Department has seen an increase in the number of institutions applying for changes in ownership where institutions seek to convert from proprietary to nonprofit or public status. A 2020 report by the U.S. Government Accountability Office raised concerns that many conversions involved continued “insider involvement,” where someone from the former for-profit ownership was also involved with the nonprofit purchaser, suggesting greater risk of impermissible benefits to those insiders.

The final regulations address the increased complexity of changes in ownership and help mitigate increased risk to students and taxpayers. These changes provide critical protections, particularly where for-profit colleges are seeking to convert to public or private nonprofit status, to ensure that colleges meet the requirements under law. It also means former owners cannot receive payments based upon inflated valuations and still have the college be considered nonprofit. They also clarify requirements on applications while detailing Department procedures in evaluating these changes. The regulations:

- State that nonprofit status for an institution undergoing a conversion is unlikely to be approved if the institution owes debts to a former owner or if it holds a revenue-sharing or other agreement with a former owner, current or former employee, or board member that is inconsistent with the market value for the services provided. The final regulations clarify that the market value consideration also applies to prior owners but does not apply with respect to debt arrangements with former owners, which would be unallowable.
- Clarify that a for-profit institution remains for-profit for the purposes of Title IV unless and until the Department approves its application to change to non-profit status.
- Require colleges to notify both the Department and their students of a planned change in ownership at least 90 days in advance, which provides the Department time to assess the planned transaction and students with sufficient notice that their institution may be changing hands.

For the complete Fact sheet on the regulations visit: [package2finrulesfactsheet.pdf \(ed.gov\)](#)

Federal Register: [Federal Register 10.28.22](#)

Press Release: [Education Department Unveils Final Rules to Protect Veterans and Service Members, Improve College Access for Incarcerated Individuals and Improve Oversight When Colleges Change Owners | U.S. Department of Education](#)

TITLE IX UPDATE: IMPORTANT NEW ED GUIDANCE CONCERNING PREGNANCY

In October, the U.S. Department of Education, Office for Civil Rights, released updated guidance for students and schools on Title IX’s prohibition of discrimination based on pregnancy and pregnancy related conditions. The guidance comes in response to the Supreme Court’s recent decision in *Dobbs vs. Jackson Women’s Health Organization*.



The guidance outlines the regulations that apply:

- 1) **Discrimination and Exclusion:** Schools must not discriminate against any student or exclude any student from their education program or activity, including any class or extracurricular activity, based on a student's pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom. 34 C.F.R. § 106.40(b)(1). A school also must not discriminate against or exclude from employment any employee or employment applicant on these bases. 34 C.F.R. § 106.57(b)
- 2) **Medical and other benefits and services:** Schools must treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom the same as any other temporary disability with respect to any hospital or medical benefit, service, plan, or policy for students. 34 C.F.R. § 106.40(b)(4). For employees, schools must treat pregnancy and the same related conditions, including termination of pregnancy, as well as any temporary disability resulting therefrom, as any other temporary disability for all job-related purposes, including employment-based medical, hospital, and other benefits. 34 C.F.R. § 106.57(c).
- 3) **Leave Policy:** If a school does not have a leave policy for students, or the student does not otherwise qualify for leave under the policy, a school must provide leave to a student for pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom, for as long as the student's physician deems medically necessary. After that leave, the student must be reinstated to the status the student held when the leave began. 34 C.F.R. § 106.40(b)(5).

For employees, if a school does not have a leave policy, or if an employee has insufficient leave or accrued employment time to qualify for leave under the school's policy, the school must treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom as a justification for a leave of absence without pay for a reasonable period of time. After that time, the employee must be reinstated to the employee's pre-leave status or to a comparable position without reduction of compensation or loss of promotional opportunities or any other employment rights or privileges. 34 C.F.R. § 106.57(d). In addition, schools must treat pregnancy and the same related conditions and any temporary disability resulting therefrom as any other temporary disability for commencement, duration, and extensions of leave, payment of disability income, accrual of seniority and any other benefit or service, and reinstatement, along with other employment-based benefits. 34 C.F.R. § 106.57(c)

For more information, please see the shared guidance at: [Pregnancy Fact Resource \(PDF\) \(ed.gov\)](#)

VETERANS DAY FEDERAL HOLIDAY PROCESSING

DJA will be open and continue to process, but because Veterans Day is a federal holiday, federal offices as well as some Title IV processors and contact centers will be closed on Friday, November 11, 2022. Central



Processing System (CPS) will accept data on Friday November 11, 2022; but will not process data or send Institutional Student Information Records (ISIRs) until Monday, November 14, 2022.

The Common Origination and Disbursement (COD) System will accept and process data from schools and send back responses/acknowledgments on Friday the 11th, but schools will not be able to receive any federal funds on that day. Requests for changes in funding levels and for funds will not be processed until Monday, November 14, 2022.

ACTIVE CONFIRMATION OF TG NUMBERS (SAIG MAILBOXES) AND ELECTRONIC SERVICES USER ACCOUNTS REQUIRED BY DECEMBER 14, 2022

Every organization enrolled for a Student Aid Internet Gateway (SAIG) account is required to review and validate its assigned TG numbers and Electronic Services user accounts by **Dec. 14, 2022**. This includes TG numbers (SAIG mailboxes) with access to the [NSLDS Professional Access](#) website, the [COD website](#), and all [FAA Access to CPS Online](#) and EDconnect user accounts. It also includes TG numbers enrolled for SAIG batch services for the National Student Loan Data System (NSLDS[®]), the Central Processing System (CPS), the Common Origination and Disbursement (COD) System, and the Financial Management System (FMS).

Important

Note: To perform the active confirmation process, every Primary Destination Point Administrator (DPA) at an organization must follow the steps outlined below for both the organization's SAIG mailboxes (Destination Points/TG numbers) *and* Electronic Services accounts. **It is a two-step process.**

Failure to accurately complete this process by December 14, 2022 will result in loss of access to Federal Student Aid data systems, including services such as Institutional Student Information Record (ISIR) deliveries, ISIR requests, Free Application for Federal Student Aid (FAFSA[®]) corrections, and NSLDS enrollment reporting and updates.

Important Reminders:

- Every organization must review the services associated with each of its SAIG mailboxes (Destination Points/TG numbers) and Electronic Services accounts and provide active confirmation that enrolled staff continue to require their access to each listed service or system. It is a serious security violation to confirm access to a service or system if the individual no longer requires it. Similarly, an individual who no longer requires professional access to any Federal Student Aid data system, or who is no longer employed by the organization, **must** be deleted from the organization's list.
- Third party servicers are also required to validate their organization's SAIG mailboxes and Electronic Services accounts. Failure to do so will mean client schools risk losing access to batch services. Schools must work with their third-party servicer to ensure the validation process is completed to avoid disruption in reporting services with Federal Student Aid data systems.



The Primary DPA of the primary TG number (Destination Point/mailbox) must perform all of the steps to provide active confirmation for 1) the organization's SAIG mailboxes (Destination Points/TG numbers) (**FIRST STEP**) and 2) the organization's Electronic Services accounts (**SECOND STEP**).

The steps required and critical information can be found in this electronic announcement at:

[Active Confirmation of TG Numbers \(SAIG Mailboxes\) and Electronic Services User Accounts Required by Dec. 14, 2022 to Maintain Access to Federal Student Aid Systems | Knowledge Center](#)

Contact Information

If you have questions, contact CPS/SAIG Technical Support at 800/330-5947 (TDD/TTY 800/511-5806) or by email at CPSSAIG@ed.gov.

DJA Clients: DJA has validated all services attached to DJA's SAIG mailboxes and all users with access under DJA. You are reminded that your school's DPA is responsible for all services/users attached to the school's SAIG mailbox.

2023-2024 FAFSA IS RELEASED AND WORKAROUND FOR KNOWN ISSUE

The beginning of the 2023–24 FASFA[®] cycle was Oct. 1, 2022. The application is available until June 30, 2024—but be sure to remind your students that some funds are limited, so it's a good idea to apply as soon as possible. Students can apply online via fafsa.gov.

Noteworthy changes

As part of the planned phased updates outlined in the *FUTURE Act and FASFA[®] Simplification Act*, changes were made to the FAFSA form. These changes for 2023-24 include:

- Removal of questions related to Selective Service registration,
- Removal of the drug conviction questions and corresponding eligibility worksheet,
- Removal of associated help text, validation logic, edits, comments, and messaging related to the Selective Service and drug conviction questions, and
- Addition of a demographic survey with questions related to gender, ethnicity, and race.

For a complete description of all the changes to the 2023–24 FAFSA form, please refer to the [Summary of Changes for the Application System Guide](#).

Federal Student Aid (FSA) announced that it has fixed a previously known issue affecting dependent students who used the IRS DRT in their initial application and later tried to change their status to “independent” in subsequent transactions. Students who were initially determined to be dependent and used the IRS DRT, or whose parent used the IRS DRT, had been unable to submit a correction in which their dependency status was now “independent.” This issue has now been resolved and users should no longer encounter this problem.

Updated FAFSA Resources



FSA staff members have been busy updating *FASFA*® resources for you. You'll find *FAFSA* resources, updates, and talking points on the [Financial Aid Toolkit](#) site. For more information about the 2023–24 *FAFSA* materials and their estimated availability dates, [visit the Financial Aid Toolkit's "FAFSA Updates" page](#).

Remember, the Financial Aid Toolkit is for financial aid administrators, the counselor, mentor, or any financial aid professional. Send students to fafsa.gov for *FAFSA* information.

Digital Outreach Resources

Visit FinancialAidToolkit.ed.gov/digital-outreach to access sample social media posts, blog posts, infographics, and videos that you can use to promote *FASFA*® completion.

College Financing Plan Available

The College Financing Plan is a consumer tool that participating institutions use to notify students about their financial aid package. It is a standardized form that is designed to simplify the information that prospective students receive about costs and financial aid so that they can easily compare institutions and make informed decisions about where to attend school. <https://www2.ed.gov/policy/highered/guid/aid-offer/index.html>

Known Issue Changing Homeless or at Risk of Being Homeless to "No" on FAFSA.gov

FSA announced they are aware that there is an issue preventing students from submitting a correction when changing their answer to the "homeless or at risk of being homeless" question to "no." If students previously answered "yes" to this question but changed their answer to "no" in the correction, an error prevents students from proceeding and providing parent information.

There are several workarounds for this issue while we work on a permanent technical fix:

- [Fafsa.gov](https://fafsa.gov) workaround (recommended): Students should start a correction and continue to indicate that they are "homeless or at risk of being homeless" by leaving their response to this filtering question as "yes." Once they reach the "Homeless or at Risk of Being Homeless Acknowledgement" page, students should select "I will provide information about my parent(s)." This will bypass the error and allow students to proceed with entering parent information. Once the parent information has been added the correction can be submitted.
- Financial Aid Administrator (FAA) workaround: Students may contact their FAA, who can perform the change on the student's behalf.
- Paper *Student Aid Report* (SAR) workaround: Students may request a paper SAR by contacting the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243) and asking that a copy be sent via U.S. mail. Students can make the change on the form and return it via mail for processing.

<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2022-10-17/issue-changing-homeless-or-risk-being-homeless-answer-no-fafsagov>

[The 2023–24 FAFSA® Form is Here! | Knowledge Center](#)



NEWEST UPDATE: MODERNIZED NSLDS PROFESSIONAL ACCESS SITE

As we mentioned in last month's newsletter NSLDS began modernization efforts to their Professional Access Site this past July. This complete overhaul of their system platform has come with several issues and caused an impact to many daily operations. FSA continues to keep the financial aid community informed regarding the modernization efforts, as well as the functionality within the site that has been affected. Their most recent Electronic Announcement shared on October 7, 2022 outlines updated information about NSLDS enrollment functionality, NSLDS post screening, issues identified since launch, and resources.

Open Issues

- **New! Enrollment Reporting Documentation for Auditors:** We are researching identified issues with the Enrollment Reporting Summary Report (SCHER1). Schools have historically provided this report to auditors as documentation of timely enrollment reporting during a specified fiscal year. Given the issues with the SCHER1 report, this is a good time for schools to transition to using Enrollment Submittal Tracking information as their documentation for auditors. There are two options for obtaining this information—the Enrollment Submittal Tracking webpage and the Enrollment Submittal File Tracking Report (SCHET1).

Enrollment Submittal Tracking Page – To access this webpage, select Enrollment Submittal Tracking from the dropdown menu under the Enrollment tab of the NSLDS Professional Access website. A user should complete the query fields—Retrieve School Location, Date Processed Begin Date, and Date Processed End Date—as directed on the screens, and then click on Apply. Once generated, the user can view the report data online or click on the Export to CSV link to save the report data in Excel format.

Enrollment Submittal File Tracking Report (SCHET1) – Another option would be to download the Enrollment Submittal File Tracking Report (SCHET1), which is available on the NSLDS Reports Tool. It provides an on-demand Excel-formatted report with enrollment submittal tracking information for the requested time period at the file-level and school-level.

Notes:

1. A school may be required to provide an auditor with enrollment reporting documentation for a fiscal year that ended on June 30, 2022. If the start and end dates for the specific period are entered in the applicable fields, documentation of enrollment reporting for that entire year will be included on the Enrollment Submittal Tracking webpage and in the Enrollment Submittal Tracking Report (SCHET1).
2. A school may be required to provide an auditor with enrollment reporting documentation for an earlier fiscal year (for example, July 1, 2020 – June 30, 2021). If the start and end dates for the specific period are entered in the applicable fields, documentation of enrollment reporting for that entire year will be included on the Enrollment Submittal Tracking webpage and in the Enrollment Submittal Tracking Report (SCHET1).



3. Enrollment reporting documentation from July 1, 2022 through July 15, 2022 is currently available via the Enrollment Submittal Tracking webpage. After enrollment reporting functionality is fully operational, we will provide schools with guidance for documenting the period of disrupted operations for auditors.
- **Updated! Enrollment Spreadsheet Submittal Errors:** A school preparing to submit an Enrollment Spreadsheet via the NSLDS Professional Access Website has the option to complete a preliminary file-level check before submitting the file for the required system-level checks.

Validate – This check is optional and does not need to be completed. If a school chooses to complete this check by clicking on Validate, file-level edits are run to confirm column completion and readiness for upload. This optional check does not compare the contents of the spreadsheet to the data within NSLDS.

Validate and Submit – This check is required and must be completed. Upon clicking on Validate and Submit, the spreadsheet contents are validated against the data within NSLDS. This validation could take a while to complete. Completion is signified by the appearance of a message stating that the file has been processed. If no errors were identified, only the processing completion statement will appear. If errors were identified, a link to a results file will appear with the processing completion statement. Upon receipt of the results file, contact the NSLDS Customer Support Center for assistance with resolving the errors and proper resubmission.

- **Updated! Enrollment History Update Functionality Suspension:** We continue to research issues impacting Enrollment History Update functionality. **Until we resolve these issues, we must continue to suspend Enrollment History Update functionality.**

Schools, school servicers, and enrollment providers **can continue to submit updates to current enrollment information** via the Enrollment Maintenance page and the Update Enrollment page on the NSLDS Professional Access website. However, updates to historical enrollment records cannot be submitted during the functionality suspension.

Note: Our focus when we resolve the identified issues will be to ensure that a student's current enrollment is correct on NSLDS Professional Access. As a result, there may be some gaps in the enrollment histories of affected students on NSLDS Professional Access. In preparation, schools should retain copies of this announcement and our [Aug. 31 announcement](#) as documentation for audit purposes. After Enrollment History Update functionality is again operational, we will provide schools with guidance for documenting any gaps in enrollment histories.

- **Updated! Enrollment Rosters:** We continue to prepare for roster dissemination. We will inform the community when we are ready to do so.
- **Roster Schedule Preferences:** We identified inconsistencies with roster schedule preferences within NSLDS Professional Access affecting a small number of schools. We have identified the cause of the issue and are working to fix it as soon as possible.

- **Online Alerts:** Messages are appearing on the NSLDS Professional Access website alerting a school that it has been more than 65 days since the school last reported enrollment or that a school is otherwise late in responding to a roster. Schools should disregard these messages as they are not applicable at this time.
- **Program Duplication:** We identified an issue with enrollment processing that is causing a student's program to appear in duplicate and the certification of that student's enrollment to be disallowed. We have identified the cause of the issue affecting a small number of schools and are working to fix it as soon as possible.

For a list of resolved issues, as well as updated information on NSLDS Post screening, you may view the Electronic Announcement in its entirety at: <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2022-10-07/nslds-professional-access-additional-information-about-modernized-website-10>

COMPLIANCE CORNER

ISSUING FINANCIAL AID OFFERS- WHAT INSTITUTIONS SHOULD INCLUDE AND AVOID

FSA has previously issued guidance on the best way to handle delivering a Financial Aid Offers. Often, students face a confusing array of options as they consider where to go to college and how to finance their education. Resources like the [College Scorecard](#) and the [College Financing Plan](#) are critical mechanisms for ensuring that students have transparent, clear-cut information about their options. However, many institutions provide supplementary information that is not always clear to students and their families. In 2021, the Department updated its guidance to institutions of higher education about what they should include and avoid when issuing financial aid offers. Please be advised of that guidance and alter your school's practices should they differ:

1. **Avoid calling your financial aid offer an "award" and avoid calling it a "letter."** Loans are not awards. Work-study is not an award; it is the potential for employment that offers earnings to students. Using a term like "financial aid offer" is clearer. Given that many institutions deliver these offers via electronic communication, calling them "letters" can also be confusing; "offers" provides clearer terminology for students.
2. **Always include cost of attendance in a financial aid offer.** For any student and/or family to be able to make an informed decision, the amount of aid received must be compared to the total cost of attendance in order to determine the student/family financial contribution. If financial aid offers exclude the total cost of attendance, students and families will be unable to contextualize the offer.
3. **Break down cost of attendance in ways that help students understand costs.** For students and families to be able to plan how to cover costs, the provided cost of attendance needs to be transparent about what is and is not included, and what is a fixed cost and what is an estimated cost. Break out individual components of the cost of attendance including tuition and fees, housing (on-campus and off-campus), and meals. Other key costs, such as books, supplies, medical insurance, and transportation, also need to be included so that students and families can consider them as they determine if a school is a financial fit for them. Institutions should also clarify whether the cost of attendance is based on



enrollment of a full- or part-time student, and whether tuition and other expenses are for an in-state or out-of-state student, if applicable.

4. **List grants and scholarship aid, loans, and Federal Work-Study separately.** Listing grant and/or scholarship aid, loans, and Federal Work-Study separately will help students and families understand the terms and specific requirements of each category. Specifically, listing them separately makes clear what is a grant/scholarship (aid that does not need to be repaid), what is a loan (aid that needs to be repaid), and what constitutes work-study (aid that must be earned by securing a job and working to receive it). Institutions should clearly label each category and sum the individual line-items within each to provide a total for that category.
5. **Explain and calculate the estimated net cost for students in the financial aid offer.** Net cost is the difference between the total cost of attendance (COA) and all grant/scholarship aid received. Students should be able to easily understand how the calculation was made, and institutions should provide this standard estimate of students' out-of-pocket and debt-financed costs. Excluding net cost is confusing to students and families and makes comparing financial aid offers very difficult, if not impossible. Additionally, institutions should not present the net cost information in ways that may confuse students, such as subtracting private or Parent PLUS loans from the cost of attendance and/or zeroing out the cost with those types of loans.
6. **Separate out other options for repaying the net cost.** Apart from federal student loans, provide a list of other options available to students, which may include tuition payment plans; state, institutional, or private loans; or federal Parent PLUS loans, for which a dependent student's parents may apply, among other possible options. Federal student loans are available to all undergraduate students, are not subject to a credit check or other underwriting and come with important protections for students and families; the same is often not true of private, institutional, or Parent PLUS loans. Institutions should name these other options separately from federal student loans, without an associated dollar amount for each, noting that students need to separately research the terms and conditions of each.
7. **Describe critical next steps in the financial aid offer.** Especially for first-generation families, the financial aid process can be intimidating, often with deadlines and fees that are not intuitive. Along with the financial aid offer, include the specific next several steps that a student/family should follow to accept or decline financial aid.

The Department feels strongly that doing these things will improve the clarity, transparency, and basic understandability of financial aid offers for students and families. When students and families understand financial aid offers, they make informed decisions that help to increase college enrollment, persistence, completion, and successful repayment of student loans. If your institution does not already, we also urge you to consider adopting the Department of Education's College Financing Plan, which incorporates the principles outlined above. To adopt the CFP, please review the information on this website: <https://www2.ed.gov/policy/highered/guid/aid-offer/index.html>.

[Issuing Financial Aid Offers—What Institutions Should Include and Avoid | Knowledge Center](#)



DJA CALENDAR

Monthly DJA Webinar: *Program Integrity, Audits and Program Reviews - Wednesday, November 2nd - 11 a.m. CDT*

NOTE: There may be a difference between DJA local time and your time zone. To determine your time zone equivalent, click on this link to view a time zone map: <http://www.worldtimezone.com/time-usa12.php>

Webinars are free to clients. There is a \$95 fee for all others who may be interested in joining us for these presentations. Invitations are automatically sent to all clients, however if you do not receive an invitation, email Renee Ford at rford@gotodja.com. After registering, you will receive the log-in information. Questions can be directed to Renee by email or by calling toll free at 1-800-242-0977

2022 DJA MONTHLY WEBINAR SCHEDULE

NOV 2	Program Integrity (Audits, Program Review)
DEC 7	1098-T Reporting

2022 FEDERAL STUDENT AID (FSA) TRAINING CONFERENCE GOING VIRTUAL November 29- December 2, 2022

There will be keynote addresses from U.S. Department of Education leadership, five general sessions, one foreign school session, 22 breakout sessions (covering the latest in financial aid policy, COVID-19 related impacts, and operational updates), and a new full-day format for Exhibit Hall (formerly the Resource Center) information.

The 2022 Virtual Federal Student Aid Training Conference agendas and session descriptions are located on the [FSA Conferences](#) website.

Registration is currently open. [Click here to Register!](#) Or visit www.prereg.net/2022/fsatc

Disclaimer: The information presented in this Newsletter is provided as a service and represents our best efforts to assist institutions with federal student aid regulations. We have collected information we believe to be important in finding and obtaining the resources for administering federal student aid; however, we assume no liability for the use of this information. The information in this newsletter does not constitute, and should not be construed as, legal advice.

