

### SULA Misunderstandings & Misreporting

**SULA Misunderstandings & Misreporting**

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**Agenda**

- Overview of SULA Concepts
- Misunderstandings and Misreporting
- Program Year Closeout
- Tools

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**Overview of SULA Concepts**

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For Discussion Purposes Only

### SULA Misunderstandings & Misreporting

#### Basic SULA Eligibility

**MEP - ΣSUP = REP**

A time limitation, not dollar amount limit

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#### Maximum Eligibility Period

Borrowers are eligible for subsidized loans for 150% of the Published Program Length in Years (PPLY) – this is called the Maximum Eligibility Period (MEP)

- o If you report the program length in years we use what you report
- o If you report the program length in months or weeks we also need your Weeks Programs Academic Year so we can convert it to years

**PPLY X 1.5 = Maximum Eligibility Period (MEP)**

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#### Converting Months or Weeks to Years

- Reporting in months - COD and NSLDS® convert to years
- Reporting in weeks - COD and NSLDS® convert to years

Conversion Formulas	Legend
<ul style="list-style-type: none"> <li>• PPLY = (PPLM X 30) + (WPAY X 7)</li> <li>• PPLY = PPLW + WPAY</li> </ul>	<ul style="list-style-type: none"> <li>• PPLY: Published Program Length in Years</li> <li>• PPLM: Published Program Length in Months</li> <li>• PPLW: Published Program Length in Weeks</li> <li>• WPAY: Weeks Programs Academic Year</li> <li>• COD: Common Origination &amp; Disbursement</li> <li>• NSLDS: National Student Loan Data System</li> </ul>

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### SULA Misunderstandings & Misreporting

**Subsidized Usage Period**

The amount of subsidized eligibility a loan uses is called its Subsidized Usage Period (**SUP**).



COD follows these three steps, in order, to calculate the SUP:

1. SUP = length of loan period + length of academic year
2. *Loan limit exception:* if loan amount is at the annual limit (i.e. \$3500, GL 1) ignore the SUP from above and make it 1.0 year
3. *Enrollment exception:* if enrollment is three quarters time or half-time multiply the SUP by .75 or .5, respectively

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**Miscellaneous Impacts on the SUP**

- COD never counts loan period days twice so a student having overlapping loan periods will see half the overlapping loan period days assigned to one of the loans, the other half to the other loan
- If the full disbursement is returned *within 120 days of the disbursement date* - when the school adjusts that disbursement down to zero (and returns the funds) and removes the corresponding term from the loan period – subsidized usage will no longer include that term/payment period
- A loan that has been paid off does not remove the loan's subsidized usage
- But the subsidized usage of a closed school loan discharge is removed



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**Misunderstandings & Misreporting**



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### SULA Misunderstandings & Misreporting

#### Loan Amount & Loan Period Misreported

*Subsidized loan with 1.0 year SUP even though only had fall disbursement for \$1750*

- Loan amount of \$3500
- Grade level 1
- Disbursements (no additional disbursements will be made):
  - fall disbursement: \$1750 – actual
  - spring disbursement: \$1750 – pending
- Loan period of fall-spring
- Academic year of fall-spring



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#### Correct Loan Amount Updating

- **Problem:** loan amount is higher than the sum of actual disbursements made (and retained)
- **Why this matters:** if loan amount is at the annual limit (\$3500, \$4500, \$5500) the annual loan limit exception triggers – charging the student a full year's subsidized usage. This borrower is being over-charged subsidized usage by ~0.6 years
- **Solution:** reduce the loan amount to the total of actual disbursements (and zero out pending disbursements)



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#### Correct Loan Period Updating

- **Problem:** loan period contains terms (payment periods) in which a disbursement wasn't made or was made but later zeroed out



$SUP = LP / AY = 1.0 \text{ Year}$

- **Why this matters:** the basic calculation of a loan's subsidized usage is length of loan period ÷ length of academic year so the excessively long loan period causes subsidized usage to be too high
- **Solution:** remove from the loan period any terms/payment periods where a disbursement isn't made/retained

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### SULA Misunderstandings & Misreporting

**Correctly Reported Loan Amount & Loan Period**

- Loan amount \$1750
- Disbursements (no additional disbursements will be made):
  - fall disbursement: \$1750 – actual
  - spring disbursement: \$0 – pending
- Loan period of fall
- Academic year of fall-spring

$SUP = \text{loan period} / \text{academic year} = \text{fall} / \text{fall-spring} = -0.4 \text{ year}$

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**Loan Period Misunderstanding**

*Loan period dates do not coincide with dates of terms/payment periods*

fall term: 9/10/17 – 12/15/17      spring term: 1/10/18 – 5/20/18  
 Loan period reported: 9/20/17 – 5/10/18  
 SUP: 0.9 year (same as REP)

- School shaved off days from the beginning or ending of the loan period until the SUP did not exceed the REP

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**Correct Loan Period Dates**

- **Problem:** loan period dates must coincide with dates of terms/payment periods. Either the whole term is in the loan period or none of it is\*
- **Why this matters:** borrowers are being awarded subsidized loans they are not be eligible for
- **Solution:** if the loan can't be re-configured correctly the remaining eligibility simply can't be used. If this happens you've awarded as much subsidized eligibility as possible – can award only unsubsidized
  - unless something changes: program, enrollment, prior loans

\*NOTE: which also means the loan period end date should **not** be shortened to the last date of attendance. The term is either all in or all out.

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### SULA Misunderstandings & Misreporting

**Loan Amount Misunderstanding**

*Loan amount was "prorated" by the remaining eligibility period*

School multiplied the REP (e.g. 0.7 years) by the annual loan limit (e.g. \$3500) to award an incorrect loan amount (\$2450)



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
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**Correctly Reported Loan Amount**

- Problem:** incorrectly "prorating" loan amount
- Why this matters:** under-awarding subsidized funds the borrower should be eligible for. If loan amount is at the annual limit the annual loan limit exception triggers but *any* loan amount less will bypass this trigger
- Solution:** if REP < 1.0 year and the loan period has been shortened then reducing the loan amount *by any amount* will keep the exception from triggering to get the loan through



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**Misunderstanding Payment Period Start Dates**

*All the loan's Payment Period Start Dates (PPSDs) are the same (e.g. the loan period begin date)*

- School's reported PPSDs:
 

• fall start: 9/10/17	Enrollment: full-time	PPSD: 9/10
• winter start: 1/10/18	Enrollment: three quarters time	PPSD: <b>9/10</b>
• spring start: 3/10/18	Enrollment: half-time	PPSD: <b>9/10</b>
- COD calculates this SUP: **1.0 year**
- Correct SUP: **0.8 year**



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### SULA Misunderstandings & Misreporting

**PPSD is the *Payment Period's* Start**

- **Problem:** reporting all the PPSDs the same (usually misreported as the loan period start date)
- **Why this matters:** when enrollment varies between terms/payment periods COD uses the PPSD to measure the length of each term to "prorate" subsidized usage based on each term's enrollment status. With PPSDs all the same it appears to COD that the loan is for a single term/payment period
- **Solution:** report the PPSD as the start date of that *payment period* or *term*, not the loan period start date

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**Enrollment Status Misreporting**

*Reporting the enrollment status as of the census date instead of the disbursement date*

School reported:

- fall disbursement date: 9/10/17 (enrollment on 9/10: **half-time**)
- School census date: 9/20/17
- Enrollment on 9/20: **full-time**
- Enrollment status reported to COD: **full-time**

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**Report Enrollment as of *Disbursement* Date**

- **Problem:** inaccurate enrollment status causing subsidized usage to be too high or too low
- **Why this matters:** overstates or understates subsidized usage since the enrollment exception doesn't trigger when it should or vice versa and then is calculated incorrectly
- **Solution:** the census date is not part of the 150% regulations. Report to COD the borrower's enrollment status as of the date of the initial disbursement of the term/payment period

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PART TIME  
FULL TIME

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### SULA Misunderstandings & Misreporting

#### Academic Year Misunderstanding

*School reported a single-term loan period and a single-term academic year*

- Loan period (LP): fall-only
- Academic year (AY): **fall-only**
- SUP = length of LP ÷ length of AY = fall / fall = **1.0 year**



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#### Report School's Defined Academic Year

- **Problem:** academic year was reduced to a single term (usually done when the loan period became a single term)
- **Why this matters:** the basic calculation of a loan's subsidized usage is length of loan period ÷ length of academic year so the excessively short academic year causes subsidized usage to be too high
- **Solution:** report your school's defined academic year, the period used to track annual loan limits. Regulatory minimum is 26 or 30 weeks. A single term academic year is never correct

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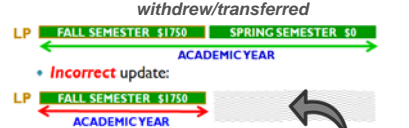
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#### Another Consequence of a Single-term Academic Year

*School updated to a single-term academic year when student withdrew/transferred*



- **Incorrect update:**

How will next school know to account for \$1750 already disbursed if their academic year should but does not overlap?



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### SULA Misunderstandings & Misreporting

**Recently Added COD SULA Edits**

*These edits should catch many reporting errors for new records coming in but they are necessarily broad and aren't retroactively applied*

**EA #23**  
10/10/2016

- Reject edit **046** if academic year less than 26 weeks
- Correcting edit **219** if loan amount is greater than sum of disbursements
- Warning edit **220** if \$0 disbursement has a Payment Period Start Date (PPSD) within the loan period (meaning loan period wasn't shortened)

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**Academic Year Misreporting**

*Scheduled Academic Year (SAY) schools with a summer header (or trailer) reporting summer in academic year though no summer disbursement was made (and summer enrollment not required)*

- Disbursements made: fall, winter, spring
- Loan period: fall-winter-spring
- Academic year: fall-winter-spring-**summer**
- SUP = length of LP + length of AY = 3 terms/4 terms = ~0.75 year

**NOTE:** COD counts the number of days but to get a quick estimate a count of the number of terms/payment periods in each will occasionally be used in this presentation

**#8**

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**Include Summer only when Summer Disbursement Made**

- Problem:** academic year includes the summer for a SAY school when no summer disbursement is made
- Why this matters:** the basic calculation of a loan's subsidized usage is length of loan period + length of academic year so the excessively long academic year causes subsidized usage to be too low
- Solution:** for SAY with summer headers or trailers only include the summer in the academic year if a summer disbursement is made or summer attendance is required

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SULA Misunderstandings & Misreporting

### Misreported Summer term

*School awarded a fall-spring loan and later a summer loan but failed to update the fall-spring loan's academic year to include summer*

001 Loan period: fall-spring Academic year: **fall-spring**  
 002 Loan period: summer Academic year: fall-spring-summer

001 SUP = LP / AY = fall-spring / **fall-spring** = **1.0 year**  
 002 SUP = LP / AY = summer / fall-spring-summer = **0.3 year**  
 $\Sigma$ SUP = 1.0 + 0.3 = **1.3 years**



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### Add Summer to 001 Loan

- Problem:** A separate summer-only (002) loan was awarded but the fall-spring (001) loan was not updated to include summer in the academic year
- Why this matters:** *fractions*
- Solution:**
  - Add summer to 001 loan's academic year
  - 001 loan: fall-spring/fall-spring-summer = 2 terms / 3 terms = 2/3 or 0.67 = 0.7 year
  - 002 loan: summer/fall-spring-summer = 1 term / 3 terms = 1/3 or 0.33 year = 0.3 year
  - $\Sigma$ SUP = 0.7 year + 0.3 year = **1.0 year**
  - But if you end up not making/retaining that summer disbursement – remove summer from the 001 loan

**NOTE:** COD counts the number of days but to get a quick estimate a count of the number of terms/payment periods in each will occasionally be used in this presentation

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### Inaccurate Reference Chart Shortcut

*School uses a reference chart short-cut for its loan counselors and denies subsidized loans for students with REPs within certain ranges*

One such overly-broad chart has the school automatically not awarding a subsidized loan if the REP is less than 0.5 years. But did they take into account:

- Enrollment status?
- Accurate reporting of prior loans?
- Loans with overlapping loan periods?



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### SULA Misunderstandings & Misreporting

#### Shortcuts are Shorting the Student

- Problem:** overly-broad reference charts are often inaccurate
- Why this matters:** Students may be denied a subsidized loan when one would go through
  - A one-semester loan typically has a 0.4-year SUP
  - A one-quarter loan has a 0.3-year SUP
  - And < FT enrollment – less yet
- Solution:** SULA calculations can be complex and are dynamic. Let COD do the calculations. There is no compliance issue with a loan being rejected. The SULA Calculator will help you

Try again

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#### Misunderstood Program Length Reporting

*Term-based school reporting a published program length of 12, 24 or 48 months and WPAY of 30*

- COD and NSLDS conversion of PPLM to PPLY:
 
$$PPLY = (PPLM \times 30) \div (WPAY \times 7)$$
- 12-month program is *not* a 1-year program but a **1.7-year** program
  - MEP is not 1.5 years but **2.6 years**
- 24-month program is *not* a 2-year program but a **3.4-year** program
  - MEP not 3.0 years but **5.1 years**
- 48-month program is *not* a 4-year program but a **6.9-year** program
  - MEP not 6.0 years but **10.3 years**

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#### Programs that should be Reported in Years

- Problem:** reporting published program length in months when it should be in years for term-based schools
- Why this matters:** borrowers getting more subsidized loans than eligible for, often a loss of subsidy when corrected
- Solution:** report to COD and NSLDS the same way you publish. If program length not published then an associate's degree should be reported as 2 years, bachelor's degree as 4 years unless academic design calls for longer. Otherwise use school's determination for how long a full-time student will take to complete

EA #17 4/20/2015

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### SULA Misunderstandings & Misreporting

#### Program Length Misreporting

*Watch your units*

Loan Period Length	38 Days
Academic Year Length	67 Days
Calculated Published Program Length Years	120 Years
Maximum Subsidized Eligibility Period	180 Years
Actual Subsidized Usage Period	0.6 Years
Remaining Actual Subsidized Eligibility Period	178.9 Years

Seriously?

✓ But at least one mistake seems to moderate the other (do you see it?)

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#### Misreported Degree Completion

*Misreported program length for students in Bachelor's Degree Completion Program or Special Admission Associate's Degree Program*

- Programs are being reported to COD and NSLDS as 2-years, resulting in loans rejected by COD for exceeding the MEP and in loss of subsidy determinations at NSLDS

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#### 4-Year Degree Completion Programs

- Problem:** program length reported as 2 years even though the program qualifies as a degree completion program
- Why this matters:** borrower will not have enough subsidized eligibility remaining to get loans in the completion program and loss of subsidy on loans already awarded
- Solution:** final regulations published on 1/17/2014 explain reporting of degree completion programs
  - ✓ Schools will report a program length of 4 years, even though the program is only 2 years in length, which will result in a Maximum Eligibility Period of 6 years
  - Bachelor's Degree Completion Programs
  - Special Admission Associate's Degree Programs

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### SULA Misunderstandings & Misreporting

**Summer Enrollment Misreporting**

*Students reported as withdrawn during the summer even though they're expected back at least half-time in the fall*

- Student was enrolled full-time in the spring and is expected to return full-time in the fall. But because student is not attending in the summer the school has reported the student as withdrawn



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**Summer Enrollment Reporting**

- **Problem:** when summer enrollment is misreported it may result in a loss of subsidy
- **Why this matters:** loss of subsidy is not warranted in many of these situations
- **Solution:** student can be reported as enrolled during the summer at least half-time as long as student was enrolled at least half-time during the previous term and is expected to return at least half-time after the summer

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**Summer Enrollment Misunderstanding**

*Student enrolled in a community college for the summer to take a course before returning to four-year school in the fall, but community college reported student in a program of study*

- Student did not receive Title IV aid
- Was not actually admitted into a program



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### SULA Misunderstandings & Misreporting

#### Combination Leads to a Loss of Subsidy

- Problem:** Four-year school misreported a withdrawal, two-year school misreported student in a program
- Why this matters:** withdrawal from the 4-year program means the longest program the student was enrolled in was the 2-year program. If the student's  $\Sigma$ SUP from loans at the 4-year school exceeded the MEP of the 2-year program: **loss of subsidy triggers**
- Solution:** don't report a withdrawal in the summer at the 4-year program, or enrollment in a program at the community college

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#### Enrollment Effective Date Misreporting

*School inadvertently reporting the enrollment certification date as the enrollment status effective date*

CIP Code: 240101		Title: Libr				
Credentia Level: 01 - Undergraduate Certificate or Diploma		Published Prog. Length in Yrs.: 1.0				
Program		Reported Program Length: 1.0				
Prog. Begin Date: 08/29/2015						
Reported By ID	Status	Eff. Date	Active	Earliest Cert.	Latest Cert.	Latest Met
	Withdrawn	06/19/2017	Active	06/19/2017	06/19/2017	School

This program could be the longest program the student was in at some point between 8/29/15 and 6/19/17. When actually **was** the withdrawal?

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#### Enrollment Status Accuracy

- Problem:** reporting the certification date as the enrollment status effective date
- Why this matters:** inaccurately reporting the student in a program, especially a shorter program when the  $\Sigma$ SUP has exceeded that program's MEP, could result in a **loss of subsidy**
- Solution:** report the graduation, withdrawal, etc. with the accurate effective date. NSLDS customer service can help

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## Program Year Closeout

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## Program Year Closeout

Prior to confirming closeout for the award year make sure you have:

- Zeroed out all pending (unused) disbursements
- Reduced the loan amount to the sum of the actual disbursements
- Shortened the loan period to remove any terms/payment periods where no disbursement was made and retained
- Reported the correct academic year dates
  - If you added summer to a Scheduled Academic Year anticipating a summer disbursement but none was made/retained – make sure you remove the summer

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## SULA Adjustments Needed Report

- Responsibility for correct reporting/updating rests solely on the school
- Reporting requirements time frames are *much* sooner than closeout deadlines
- COD implemented processing changes and a number of edits to assist but they are not all-encompassing
- This new report will be run in the closeout time frame to alert schools to at least some of the records they missed
- COD will update those records after closeout if schools fail to
- Does not relieve schools of their responsibility
- Our edits are necessarily broad and can't possibly catch everything

**New**

**EA #24**  
6/29/2017

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### SULA Misunderstandings & Misreporting




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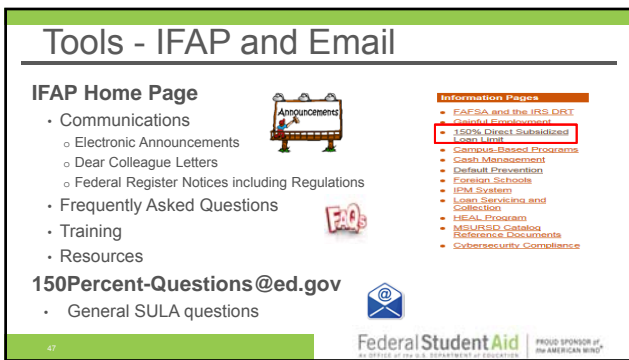
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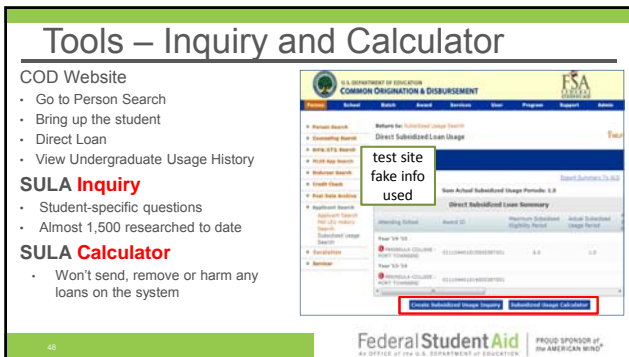
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### SULA Misunderstandings & Misreporting

**Contact Information**

Contact me with follow-up questions about this session:

David Bartlett, FSA Training Officer  
 david.bartlett@ed.gov | (816) 268-0434



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**Contacts**

- Kansas City School Participation Team
- Main Number: 816-268-0410
- IIS – Jim Wyant: 816-268-0431  
[jim.wyant@ed.gov](mailto:jim.wyant@ed.gov)



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**Training Feedback**

To ensure quality training we ask all participants to please fill out an online session evaluation

- Go to: <https://s.zoomerang.com/s/DavidBartlett>
- Evaluation form is specific to David A. Bartlett
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to Mark Gerhard at [mark.gerhard@ed.gov](mailto:mark.gerhard@ed.gov)

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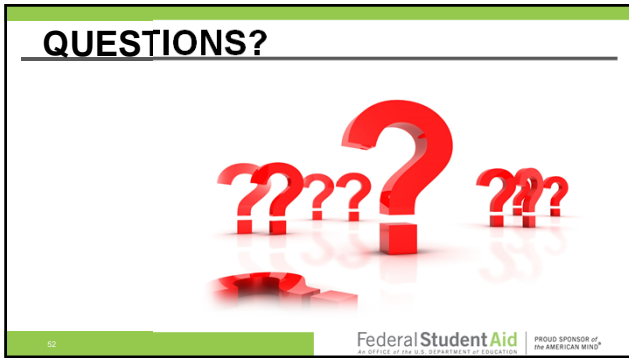
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For Discussion Purposes Only

SULA Misunderstandings & Misreporting



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For Discussion Purposes Only