Pell Reporting

This chapter explains how to report Pell information for 2003-2004 to FSA through the Common Origination and Disbursement System (COD). The material here is intended primarily for Phase-in participants. Full participants should refer to the COD Technical Reference.

OVERVIEW OF COD

COD integrates the origination and disbursement functions of the DLOS and RFMS into one system and represents a migration from program-centric systems to a student-centric system. For Pell reporting purposes, COD replaces the Recipient Financial Management System (RFMS).

For the 2003-2004 Award year, there are two types of COD participation: Phase-in Participants will continue to submit a fixed length format record similar to that sent to RFMS, and full participants will submit a "Common Record" in XML format. COD will accept records in either format and will return the processed data in the same format.

The first step is to create origination records for each of your Pell-eligible students. You can submit origination records for any student to whom you might pay a Pell Grant. For instance, you might create an origination record for all students who listed your school as their first choice on the FAFSA. When COD receives origination records, it checks the records for errors and then returns an acknowledgment/response to your SAIG mailbox.

To disburse Pell funds, you must submit a disbursement record to the COD system with the amount of the disbursement and the actual date that you will disburse the funds. COD will return an acknowledgment for the disbursement record, which will let you know if there were any problems with the submission.

Pell Software

The EDExpress software includes a Pell Payment module. Partial participants using EDExpress should consult the Pell Tech ref (see sidebar this page). Full participants do not use EDExpress to interface with COD. Schools using third-party software should consult the materials provided by the vendor. A school that develops its own software will want to refer to the record layouts for the various COD records, as the records created by your software have to be formatted correctly to be accepted by COD.

Common Origination and Disbursement (COD) System

Schools report their disbursements for the 2003-2004 award year to the COD system. For Pell data & Support:
http://cod.ed.gov
codsupport@asfa.com
Also: 1-800-474-7268

COD Benefits

COD simplified the aid delivery process by using a single record for each student's Pell and Direct Loan records. This eliminates redundant data records and creates a student-centric rather than program-centric record. In addition, COD does not require full participants using the common record to submit all data elements in each submission. Only the elements necessary for the particular business process your school is trying to perform are needed.

Pell Technical References

Phase in schools should use the Pell Tech Reference and Full participants use the COD Tech Reference. Schools can download the Pell and COD Technical References from: <http://sfadownload.ed.gov>

Pell Record Layouts

The layouts are available on the Information for Financial Aid Professionals (IFAP) web site at : <http://ifap.ed.gov/IFAPWebApp/currentPGRFMSProcessPag.jsp?p2=c>. IFAP also has other information about Pell, such as edit codes, and a series of Action Letters describing the system.

Initial Authorization Notes

The schools participating in the Just-In-Time Funding pilot as well as Push Cash schools don't receive an initial authorization because they don't draw down funds.

Instead of having an initial authorization, JIT and Push Cash schools Pell funds are automatically deposited in the schools' bank account, based on actual disbursement records they submit.

Reimbursement schools' Initial Authorization is always zero. Reimbursement schools must request funds via GAPS.

Reporting Method
Electronic Data Exchange

The Department supplies PC software (EDConnect) for you to transmit your Pell records to your SAIG mailbox on the Internet. You may also use 3rd party software to accomplish this records transmission function.

PELL AUTHORIZATION

At the beginning of each award year, Advance Funded schools receive an Electronic Statement of Account (ESOA) with an initial authorization based on an estimate of the Pell funds the school will need to cover its first payments. As the award year progresses, the authorization will be adjusted based on the actual dollar amount of disbursements the school reports to COD. Note that your school's authorization level in GAPS will not rise until seven calendar days prior to the disbursements that triggered the authorization increase. As your school reports disbursements to COD, COD makes any necessary adjustments to the authorization, and if additional Pell funds will be needed, COD notifies GAPS and sends your school a revised ESOA. COD enables the Department to track your school's need for funds (based on record submission) as the award year progresses and adjust the school's authorization on that basis. The system also provides documentation to your school for reconciling your school's records of total expenditures with the Department's records of eligible students paid by the school. (This documentation is the Year-to-Date data; see "Year-to-Date Records," in this chapter.) The Pell funds that your school reports as expenditures to GAPS must equal the total payments to eligible Pell recipients at the school, as shown by the COD records for each student.

ORIGINATION RECORDS

Origination records don't include actual disbursement dates and amounts, because they are reported separately on disbursement records. Phase-in participants must submit an origination record for every Pell recipient. COD will edit the data to ensure that the student is eligible for the reported Pell amount and create an account for that student.

Submitting Records

You may submit an origination record for every student you **might** pay during the award year. Also, more than one school can submit an origination record for a student. However, COD only accepts one origination record from each school for each student; if you submit another origination record with different data for a student, COD treats the new record as an update to the original record.

Timing of submissions

You can submit an origination record as early in the year as you choose, once the system starts up. In 2003-2004, schools will be able to submit origination records when COD is brought online in late spring. Although you may now submit origination and disbursement records simultaneously, it is often to your benefit to submit origination records in advance of the time of disbursement. This will allow you enough time to correct any problems with the student's record that might otherwise delay disbursements.

During the award year, you may not submit disbursement records more than 30 days prior to the actual disbursement. Disbursement records for 2003-2004 will not be accepted prior to

June 21st, 2003. Origination records and Disbursement records must be batched separately but may be submitted to COD in the same transmission.

Specific Origination Record Items

The software you use to prepare origination records should require data to be entered in the correct format. Some fields are required, and others are optional. EDExpress software and most 3rd party software include edits that will catch some errors, but you should still check each student's information for accuracy.

Award amount

The award amount is reported as seven numbers, with no other characters such as dollar signs, commas, or periods. The last two numbers represent cents, so for an award amount of $4,000, you would report 0400000 as the award amount to COD. If you don't report an amount for cents, COD will take the last two digits to be the cents amount. Therefore, if you report an award amount of 2000, COD will take this to be an award of $20.00, not $2000.00.

Low tuition and fees code

This is an optional item, indicating that you used the Alternate Schedule to determine the student's annual award (see Chapter 2 of this volume). The Alternate Schedule reports a number code that shows the range you used for the students tuition plus dependent care and/or disability expenses of:

1 $0

2 $1-$225

3 $226-$450

4 $451-674

5 $675 or more

Enrollment date

This is the first date the student was enrolled in the eligible program for the award year. (For this item, "enrolled" means the first day the student attended classes.) If the student enrolled in a crossover payment period before the first day of the award year (July 1), report the actual date enrolled, even though that date occurs before the start of the award year.

Academic calendar

The academic year categories are defined as follows:

1 Credit hours—nonstandard terms. The school uses nonstandard academic terms but measures progress by credit hours or units.

2 Quarters. The school uses standard term quarters and measures academic progress by credit hours.

Timing of Origination Records Example

Malvek University decides to submit as many of its origination records as possible at the beginning of July. Three students face the following circumstances:

Sal won't be attending until the Spring semester next year, but Malvek University submits an origination for him anyway in July. This record is accepted, and Malvek will now just have to submit a disbursement record closer to Sal's disbursement date.

Dave will start in the Fall; the origination record Malvek submits for him is rejected, but it will have several months to submit a new origination record and fix the problems.

Frank is supposed to receive a disbursement in July, so Malvek submits a disbursement record for him in the batch with all the origination records. His origination record is rejected, which causes his disbursement record to be rejected too. Malvek will need to resolve the problem quickly and submit both a new origination record and a new disbursement record for Frank.

Origination Record Data Elements

The required items are:
- Origination ID
- Original SSN
- Original Name Code
- Attending Campus Pell ID
- Award Amount
- Estimated Disbursement Date #1
- Enrollment Date
- Transaction Number
- EFC
- Academic Calendar
- Payment Methodology
- Cost of Attendance
- Current SSN
- Last name (can be blank)
- Date of Birth

The optional items are:

- Origination Cross-Reference
- Estimated Disbursement Dates #2-#15
- Low Tuition and Fees Code
- Incarcerated Federal Pell Recipient code
- Secondary EFC

Enrollment Status Codes

1 Full time
2 Three-quarter time
3 Half time
4 Less than half time
5 Other

3 Semesters. The school uses standard term semesters and measures academic progress by credit hours.

4 Trimesters. The school uses standard term trimesters and measures academic progress by credit hours.

5 Clock hours. The school measures academic progress by clock hours.

6 Credit hours without terms. The school doesn't use terms, and measures academic progress by credit hours.

Cost of attendance

The cost of attendance is reported as seven numbers, with no other characters such as dollar signs, commas, or decimal points. The last two numbers represent cents, so for a cost of attendance of $10,345, the school should report 1034500. If you submit a cost of attendance of 10345, COD will take that to be a cost of attendance of $103.45. The cents amount doesn't have to be zero, so a school should report a cost of attendance of $3,456.89, as 0345689.

Enrollment status

This item must be reported by Phase-in schools, but not COD full participants. This item is no longer cross checked for accuracy, but is required on legacy format records (phase-in participants). "Other" is used when the student's enrollment status is "mixed"—for instance, when a student attends full time one term and half time the next, or when the student attends an additional (optional) term within the award year.

Weeks of instructional time used to calculate payment

If you're using Formula 1 to calculate the Pell Grant, don't complete this item, it is not used in formula one, but **is** reported for all other formulas. (See Chapter 2 of this volume for more information about the formulas.) Note that this is an amount for the entire award year; this amount won't match the amount actually used in calculations under Formulas 3 and 5B because they only use the number of weeks in a particular payment period in the calculation.

For standard-term-based, credit-hour programs (programs using Formula 2), this is the total number of weeks provided in the school's fall through spring terms. For other term-based, credit-hour programs (programs using Formula 3 or 5B), this is the total number of weeks of instruction provided in all terms that are part of a normal complete academic year. For programs using Formula 4 or 5A, this is the number of weeks of instructional time provided by the program or academic year, whichever is less. Note that the weeks of instructional time might not be the same as the number of calendar weeks (see the *FSA Handbook: Institutional Eligibility and Participation [Volume 2]* for more information). The number you report here can never be more than the number of weeks in the program's definition of academic year, which is also reported on the origination record. If it is larger (which

should only happen for programs using Formulas 4 or 5A), you should adjust one of the two numbers so they're the same.

Credit/clock hours in all payment periods to complete school year

This item is completed only for clock-hour (schools using Formula 4) or nonterm credit-hour programs (schools using Formula 4 or Formula 5A). It's the number of hours or credits the student is expected to complete in all payment periods occurring in the current award year. If you are paying the student in the current award year for payment periods that are in progress or are already completed, you must be sure to include those payment periods in this total. This number can't be more than the number of credit/clock hours in the program's definition of academic year, which is also reported on the origination record.

Origination corrections

COD makes corrections to invalid values whenever possible, rather than rejecting the record. Corrections will be noted as warnings on the record acknowledgment. Values may be invalid because they're formatted incorrectly, or they may be invalid in relation to other data the school has reported. For example, if you reported the academic calendar as 3 (Semester) but the payment methodology is reported as 4 (Credit/Clock Hour, or Formula 4), COD would correct the payment methodology to 3, (Credit Hour with standard or nonstandard terms) to agree with the reported academic calendar. The record layouts detail how COD corrects invalid values. COD will also calculate the maximum award amount the student can receive, based on the Cost of Attendance and EFC on file with the CPS. If the reported award amount is more than this maximum amount, COD will correct the award amount. Note that COD won't **increase** the award amount you reported; if you accidentally report an award amount that's too low you'll need to update the origination record itself.

Origination, Disbursement, and Data Request Edit Codes

COD sends edit codes when data you submit trips an edit function. COD has error checking for data which may be independently incorrect, such as a DOB in the future, and also error checking for internal consistency that cross-checks various data elements. An example of an error code you might receive might be "(313) Invalid EFC/Correction Applied." The error codes for Phase in and Full Participants are different. For information about specific edit codes and how to resolve them, Phase-in participants should refer to the Pell Technical Reference and Full COD Participants should refer to the COD Technical Reference, both available at <http://sfadownload.ed.gov>

Weeks of Instructional Time Examples

Tharian College uses Formula 2 to calculate Pell Grants. It has two 14-week semesters, and in the calculation it reduces annual awards by multiplying them by 28/30 (weeks of instructional time in the terms divided by weeks of instructional time in the academic year). Tharian College reports 28 as the weeks of instructional time used to calculate payment.

Lochlan University has a nonstandard term program that has a short 4-week term between two 15-week terms. It uses Formula 3 to calculate Pell awards for this program. It determines payments for the 15-week terms by multiplying the annual award by 15/34 (weeks of instructional time in the payment period divided by weeks of instructional time in the academic year) and for the 4-week term by multiplying the annual award by 4/34. A student enrolling in all the terms for a normal year would have 34 weeks of instructional time (and would eventually receive 34/34ths of an annual award). Lochlan reports 34 as the weeks of instructional time used to calculate payment.

Peabodi Technical Institute has a program that provides 27 weeks of instructional time. The academic year is 30 weeks of instructional time. In calculating payments, Peabodi multiplies the annual award by 27/30 (weeks of instructional time in the program divided by weeks of instructional time in the academic year). Peabodi reports 27 as the weeks of instructional time used to calculate payment.

Student Identifier Match with CPS

The following data elements on records you submit to COD must match data stored by the CPS:
Current Last Name
Current SSN
Current DOB

COD Record Acknowledgments

When COD receives origination records, it edits them to make sure there are no errors. Then it sends an acknowledgment back to you. COD will send one acknowledgment record back for each origination or disbursement record it received.

COD will either accept the record without corrections, make corrections to some of the items, or reject the record. COD only rejects the record if there are errors that can't be corrected. The acknowledgment record has an action code that shows whether the origination record was accepted (A), corrected (C), a duplicate (D), or rejected due to errors (E). The record also has error codes that tell why a particular record was corrected or rejected.

You should check records rejected because the current name was invalid or didn't match; in many cases, this means that the student doesn't have a FAFSA on file. You must correct the incorrect information before COD will generate a disbursement record and you can pay the student.

When a record is accepted or corrected, the acknowledgment record reports back the values on file within COD for each data element on the record. COD keeps each data element's accepted or corrected value. If a record was rejected, the acknowledgment record reports back the values reported for each data element, and COD keeps the data for a record that was rejected due to errors, which will be viewable on-line.

When a disbursement record has been accepted or corrected, the acknowledgment record has a Year-to-Date disbursement amount for the student. You can use this to help reconcile your school's records for the student with COD's disbursement record of what the student has received for the year. If the disbursement record was rejected, the Year-to-Date disbursement amount will be left blank.

DISBURSEMENT RECORDS

You must report each payment made to each eligible student via disbursement records. As mentioned previously, before COD will accept a disbursement record, it must have an accepted origination record for the student. Although you can submit both records within their respective batches in the same transmission, if there's a problem with the origination record, the disbursement record won't be accepted.

Timing of Submissions

• If your school uses Advance Funding, you can submit a disbursement record up to 30 days before the actual disbursement date. However, you may want to wait until closer to or after the disbursement date, because if you don't make a reported disbursement, you will need to submit another disbursement record reducing the payment amount.

• If your school is using Just-In-Time or Push Cash funding, you can submit records up to seven calendar days before the disbursement date.

• If your school is on Reimbursement or Cash Monitoring you can't submit a disbursement record until you've actually made the disbursement to the student.

In all cases, a record that's submitted too early will be rejected. A disbursement record should be submitted no later than 30 days after the disbursement is made. (See "Reporting Deadline" in this chapter).

Specific Disbursement Record Items

The disbursement record must have an Origination ID, which must match an origination record in the database. If there's no match, the disbursement record will be rejected. It must also have a disbursement reference number. You can assign these numbers as you choose, but the number must be from 01 to 65 and must be different for each of the student's disbursements. You may find it convenient to number each student's first disbursement 01, and then use consecutive numbers for the following disbursements.

There are two parts to reporting the disbursement amount. First, the disbursement record has a debit/credit indicator flag. If this is set to "P" (positive), it means you are reporting a positive disbursement (money paid to the student). If it's set to "N" (negative), you are reporting a negative disbursement (money taken from the student, or an award reduction). On the first disbursement record you submit for a student, the debit/credit indicator flag must be P (positive). You report the disbursement amount on the same record. Again, you may report cents for the disbursement amount.

> **COD Full Participant Terminology**
> COD full participant terminology differs slightly from that of legacy format reporting. On disbursement records, full participants assign "disbursement sequence numbers" rather than disbursement reference numbers (same 01-65 numbering scheme). Also, instead of reporting a positive or negative disbursement flag and amount, full participants simply report a new "replacement" value that does not adjust a previous award but instead replaces it.

REPORTING CHANGES TO COD

If the origination and disbursement record acknowledgments you have received are accurate and there are no changes to the students' awards, you simply retain these records in your school's files. However, if the information for any student is wrong or changes during the award year, you may have to make corrections.

The most frequently required changes are to the Cost of Attendance (COA), verification status (to update a "W," payment without documentation), and payment amounts and dates. Other changes occur less frequently, except in cases of error. For instance, your academic calendar isn't likely to change during the award year.

Changes to Origination Record Information

In general, you only need to submit an updated origination record to notify COD that a student's award amount has increased. Otherwise, COD won't accept disbursements that would exceed the amount you initially reported. To update the origination record, send a new record with the same **SSN**, **Last name**, **Date of birth**, **Origination ID**, and **Attended Campus ID** as the previously accepted origination record. If any of these are different, COD will assume that you are sending in a different origination record instead of updating an existing record. If all these identifiers match those on a previous origination record, COD replaces the data from the previous record with the data on the new origination record.

Correction types

- *Estimated Disbursement Dates.* You don't have to submit an updated origination record if the actual disbursement dates are different because the disbursement dates reported on the origination record are only estimated.

- *Academic Calendar.* You don't have to report a change from one type of standard academic term to another (for example, from a quarter system to a semester system). Other calendar changes (for example, from a credit-hour to a clock-hour calendar) must be reported.

- *Cost of Attendance.* Only report a change that doesn't increase the amount the student will be paid for the year.

- *Accepted weeks of instructional time used to calculate payment, Accepted Credit/Clock Hours in award year.* You don't have to report a change to these items if the change doesn't increase the amount the student will be paid for the year.

- *Accepted weeks of instructional time in program's definition of academic year, Accepted Credit/Clock Hours in program's definition of academic year.* You report a change to these items only if you are redefining a program's academic year. (For example, the school decides to change its 32-week academic year to 30 weeks.)

Changes to Disbursement Information
Disbursement Corrections

On a disbursement record, there aren't many items that can be corrected. However, the record layouts explain the corrections that can be made on the disbursement records. COD will verify that the student will not receive more than the accepted award amount on the origination record. COD also checks to see if disbursements already made by other schools would cause the student to receive more than a Scheduled Award. If so, a Multiple Reporting Record is sent to notify all schools involved. If the disbursement amount reported on the disbursement record would cause the student to receive more than a scheduled award, COD will not reduce the disbursement amount but will enter the Potential overaward process.

Potential overaward (POP)

If the combination of payments reported would cause the student to receive more than a Scheduled Award, COD will accept and process the disbursement and send an MRR (with contact information) for all schools involved. The student will be allowed to remain in an overaward status/situation for 30 days. If the situation has not been remedied after 30 days, each school involved will receive a negative disbursement decreasing all previously accepted disbursements for the 2003-2004 award year to zero. Valid disbursements can be resubmitted after this to reinstate the award.

Correction Example

MacLean University paid IJ $1,666.67 for his full-time enrollment in the fall semester. The calculated amount for the second semester is also $1,666.67. MacLean reports this amount (as 0166667) on the disbursement record it submits for the second semester. On the origination record MacLean submitted for IJ, the annual award amount was 00330000 ($3,300). The second disbursement amount reported by MacLean would cause IJ's total disbursement amount to be $3,333.34, more than the annual award amount accepted by COD. Therefore, COD reduces the amount on this second disbursement record to 0163333 ($1,633.33), which is the most he can receive without exceeding the annual award amount on file with COD .

To correct payment amounts using the standard Pell layout, submit a new disbursement record. Unlike origination records, the information on the new disbursement record doesn't replace the existing record. Instead, the payment amount reported on the new disbursement record is added to or subtracted from the accepted payment amount, resulting in a new total payment to the student. In contrast, schools using the new COD common record will submit replacement values rather than the amount of the increase or decrease.

Because the old disbursement record information isn't replaced, you can't actually correct an incorrect disbursement date. If you reported an actual disbursement that wasn't made, you should simply send in a new disbursement record with a negative disbursement amount for the amount you reported for the payment.

Concurrent enrollment

Because a student can't receive Pell Grant funds from two schools for the same period of enrollment, COD provides an MRR as a warning to schools that the student might be receiving payments from different schools for the same time period. If COD receives disbursement records for a student showing enrollment dates that are within 30 days of each other, it will generate an MRR for each school. This MRR will have a record type code of "CE" which shows that it was generated because of a possible concurrent enrollment. However, COD won't prevent either payment, because it's possible that the student's enrollment at one school might end before the enrollment at the other begins. Once again, the MRR has contact information, so that you can resolve any possible problems with the other schools.

Reporting Deadline

You must submit a disbursement record within 30 days of the date you become aware of a Pell Grant change (for example, a new recipient or an increased award). You may do this by reporting once every 30 calendar days (or more frequently), or you may set up your own system to ensure that changes are reported in a timely manner. For example, you may decide to report every other Friday on all changes since the last report, or set up a program to check the records daily for changes and report the changes the same day. In some cases, you may also need to submit an updated origination record.

If you don't report any data for a period of 30 or more calendar days, COD will assume you had no data to report for that period, and any actions (such as changes in authorization levels) will be based only on the data reported up to that time. The 30-day reporting requirement ensures that federal funds won't remain at a school when its students don't need the funds. It further ensures that if the student transfers to another school, Pell payments to the student through the new school won't be blocked. Schools that don't submit required records on time, and schools that submit incomplete records, will have their Pell allocations reduced and may be fined.

Concurrent Enrollment Example

Eric is enrolled in a clock hour program at Peabodi Technical Institute. Peabodi reports an enrollment date of August 16, 2003, on the origination record it submits for Eric. Eric is also enrolled part time at Chrisburg Community College. Chrisburg submits an origination record with an enrollment date of September 7, 2003. On August 23, Chrisburg submits a disbursement record for Eric, which is accepted by COD. No automatic MRR is generated yet, because only one school has submitted a disbursement (although either school could have requested an MRR that would show that the other school had submitted an origination record for Eric). On September 2, 2003, Chrisburg submits a disbursement record for Eric. COD now automatically generates an MRR for each school.

Reporting Deadline Cite

34 CFR 690.83; August 15, 2002 Federal Register notice on IFAP, new notice to be posted Summer 2003.

Reporting Deadline Example

On November 4, Arcanium College determines that a Pell award it has previously reported to the Department must be reduced. On November 12, it pays five new recipients and determines that it must increase the amount it reported for another student's award. December 4 is 30 days after November 4, so Arcanium must report the downward adjustment by that date. On December 4, the school bundles the November 4 and November 12 payments and adjustments and submits new disbursement records for them all, plus an updated origination record for the increased award. Arcanium could also have waited until December 12 to report the changes from November 12.

On December 17, Arcanium pays another new student and learns that a student for whom it submitted a disbursement record reporting a spring semester disbursement won't be returning. January 16 is 30 days after December 17. Therefore, January 16 is the deadline by which Arcanium must submit new disbursement records for these two changes.

Late Adjustments Cite
34 CFR 690.83(d)

Late adjustments due to program review or audit

In certain limited circumstances involving an audit adjustment or a program review, your school can receive reimbursement even if it didn't submit correct disbursement records for a student before the submission deadline. The Department will reimburse your school if an audit identifies funds that it owes to your school—including funds for which your school did not request reimbursement before the audit, provided all applicable Department rules and requirements were met.

In order to receive reimbursement under this provision, your school must show that it qualifies based on a finding in its initial audit of the award year; the initial audit report must have been submitted in a timely manner in accordance with 34 CFR 668.23(c). (See the FSA Handbook: Institutional Eligibility and Participation [Volume 2] for more information about audit requirements and deadlines.)

Your school can also receive reimbursement if under a program review it is documented that you submitted a disbursement record for a student before the deadline, but didn't submit a correct disbursement amount for that student. In order for your school to receive reimbursement, the underpayment must be at least $100, and a program review must show that the student was eligible to receive more than your school originally reported.

Audit Adjustment Procedures Cite
"Dear Colleague" Letter P-97-2, June 1997

You can submit disbursement record batches more frequently than once every 30 days. You can submit batches daily or weekly if you choose--there's no limit on the number of batches. All disbursement records for the 2003-2004 award year must be submitted by September 30th, 2004 (see below for exceptions). You may need to submit some disbursement records after the end of the award year to report summer school payments, recently verified students, or outstanding changes. Remember that COD must have an origination record on file before any disbursement records will be accepted.

Adjustments after September 30

Only records with negative disbursement amounts will be accepted after the normal submission deadline. This allows schools to reduce overpayments whenever they're discovered.

If you need to report a new origination, increase an award amount on an origination record, or report a positive disbursement amount after September 30, 2004, you can ask the Department for administrative relief (see sidebar) if the situation is due to unusual circumstances beyond your school's control or a processing error on the part of COD.

These requests must be made in writing and must be received by May 1 of the calendar year following the award year (for example, by May 1, 2005, for the 2003-2004 award year). If you have questions about administrative relief, contact Pell Customer Service at 1-800-4-PGRANT (1-800-474-7268).

Adjustments due to overpayments

You can adjust the student's disbursement amounts for an overpayment whenever you determine that a student was ineligible to receive all of the Pell Grant funds disbursed. If your school is liable for the overpayment, you must report the reduction to the proper amount whether or not you can collect the overpayment from the student. If your school isn't liable for the overpayment, you report the amount to the ED Collections (DCS) at: US Department of Education Debt Collection Service, PO Box 4169, Greenville, Texas 75403-4169. (See Chapter 5 of this volume and Chapter 8 of the *FSA Handbook: Student Eligibility [Volume 1]* for more information on how to handle overpayments.)

INFORMATION REQUESTS

MRRs

You can request different kinds of MRRs. For example, you can request a list of other schools that have submitted origination records for certain students, or other schools that have submitted disbursement records. You can request information about all students you have sent origination records for, about selected students, or about an individual student. Or, you can ask for information on all students for which a particular school has submitted a record.

Year-To-Date Records

You may request a Year-to-Date file for your school at any time during the award year. The COD Year-to-Date file contains origination and disbursement information. However, the Year-to-Date data only includes information from those records that were accepted or corrected. COD doesn't keep any information from rejected records, so that information isn't available in the Year-to-Date records. You request the YTD files via EDExpress or the COD website.

The Year-to-Date origination record for a student will show the origination information that COD is using for the student. If COD made corrections to the data or you corrected any data, the Year-to-Date record has the corrected information, not the original amount. This record will also have the total amount disbursed to the student for the year. The Year-to-Date disbursement records for the student show the accepted data for each disbursement that you reported. You can review Year-to-Date records to see if COD has information that differs from your school records.

The Year-to-Date summary will show the total number of recipients at your school, the number of origination and disbursement records that were accepted, corrected, or rejected, and, for certain edit codes, the number of times you received that edit code on an acknowledgment.

Your school's software should allow you to generate the information you need to reconcile your records with the Department's records. For example, you may be able to automatically compare your records to the Year-to-Date record to get a list of students who have differing disbursement amounts in the two sets of records. You should consult the documentation for your software for more information on the uses of Year-to-Date data.

Electronic Statement of Account

The ESOA summarizes the status of your school's spending authorization versus the amount you have expended to date for the award year. There are two ways you can receive an ESOA:

1) The Pell Processor automatically generates an ESOA

2) You can send requests electronically for ESOAs. Send your requests via the SAIG.

When the Pell processor has accepted enough disbursements to exceed their authorization level, it automatically generates a new ESOA to the school. For advance funded schools the CPS only generates an ESOA when the authorization level is exceeded or decreased; it is not generated each time a disbursement is accepted. However, if a school is Just-in-Time funded, to assist with the short JIT business cycle and to account for the fact that JIT schools do not begin with an initial authorization and their funding is on a per

student basis, an ESOA is produced each time a disbursement batch with accepted records is processed. ESOAs are sent as PGAS record from the CPS with a header and trailer record to your SAIG mailbox.

Reconciliation File

To assist schools in their end of award year reconciliation, FSA makes available a Pell Reconciliation tool to all schools participating in the Federal Pell Grant program. This file should be particularly useful to schools that use third party or "home-grown" software that may not provide extensive reconciliation tools, but it may also be of use to those schools using EDExpress. You can request the reconciliation file through EDExpress or the COD website. Information on the reconciliation tool for the 2003-2004 award year will be posted to IFAP.

REQUESTING FUNDS FROM GAPS

As mentioned in the beginning of this chapter, COD tracks your school's need for Pell funds during the award year at a recipient level and adjusts Pell authorizations accordingly. When your school requests Pell Grant or other funds from the Department, that request is handled by a different system called the Grant Administration and Payment System (GAPS).

Electronic Financial Interfaces

Most postsecondary schools (except state institutions) that participate in the FSA Programs use the Automated Clearinghouse/Electronic Funds Transfer system, which is essentially a direct deposit system.

A second method for requesting funds from EDCAPS/GAPS is through FEDWIRE. Most state institutions use FEDWIRE. Under this method, requests for funds go directly to EDCAPS/GAPS.

If you're responsible for your school's fiscal office activities, you should refer to the GAPS *User's Guide* (available at http://e-grants.ed.gov/ once you have logged into GAPS) and to the current edition of the FSA *Blue Book* (available on IFAP).

Administrative Cost Allowance

Your school is entitled to an administrative cost allowance (ACA) to help offset the costs of administering the Pell Grant Program. The Department will notify your school of the amount of its ACA several times a year, and pay it automatically by EFT. You don't need to request the ACA.

A school receives $5 for each of its reported Pell recipients. Students who later withdraw are included in the number of recipients, as are transfer students, but those whose disbursement records are

rejected by COD aren't included. The ACA must be used only to help pay the costs of administering the Federal Pell Grant Program and the campus-based programs (see the *FSA Handbook: Campus-Based Programs Volumes*). If your school enrolls a significant number of less-than-full-time or independent students, it's required to use a reasonable proportion of the ACA to assure that financial aid services are available to those students.