



JUNE 2025 NEWSLETTER

IMPORTANT DATES:

July 3-4 DJA Closed for Independence Day

July 14-16 **MAACS** Conference Champion, PA

July 16 DJA Webinar: Campus Crime Report 11am CST

July 31 23-24 Direct Loan Closeout Deadline

August 20 Campus Based Reallocation Form due

August 24-27 **ACCET Annual Conference**

IN THIS ISSUE:

- In the News: Senate Releases Version of One Big Beautiful Bill
- **Default Prevention** Resources
- **FSA Releases Actions** to Prevent Fraud through Identity Verification
- Reminder: Report 2024 FWS Earnings to COD
- Training on FSA Partner Connect
- Upcoming Deadlines
- Compliance Corner
- DJA Calendar

While the temps climb outside, things are just as hot in the world of education. July kicks off a new federal award year—farewell 2024-25, hello 2025-26—and with that comes fresh compliance and reporting responsibilities for institutions across the country. Meanwhile, on Capitol Hill, the Trump administration is charging ahead with its "one big, beautiful bill", which just squeaked through the Senate thanks to a tie-breaking vote cast by Vice President J.D. Vance. The implications are still unfolding, but change is clearly in the air.

In this edition, we'll break down the significant impacts Trump's bill will have on the higher education industry, as well as review the major changes the Senate made in contrast to the House's proposed bill. As we shift into the next award year, we also remind you of upcoming deadlines to close out prior award years and compliance reporting that is soon due.

Additionally, we follow up on last month's reporting encouraging institution's to reach out to student's in default by sharing new resources released by FSA. FSA also announced this past month efforts they are implementing to crack down on identity theft. Their actions make changes to how verification is completed for V4/V5 by removing the Statement of Educational Purpose. As part of these measures, FSA also pushed a wave of System Generated ISIRs selected for V4/V5 verification. Last month we also covered the shift of SAIG Enrollment moving to the FSA Partner Connect site. To assist in this transition, we share FSA training resources and webinars.

Lastly, two important reporting deadlines earn spots in this month's newsletter as we remind institutions participating in the Federal Work Study program of the requirement to report 2024 FWS earnings to COD under the FAFSA Simplification Act. The second requirement is the highlight of our Compliance Corner as we review the necessary steps to closeout the 23/24 DL program by the July 31st deadline.

Until next month, stay informed and engaged,

Renee Ford, Vice President

IN THE NEWS: SENATE PASSES ITS VERSION OF TRUMP'S ONE BIG BEAUTIFUL BILL ACT

President Donald Trump's, One Big Beautiful Bill Act, has been the focus of his legislative priorities. The bill was narrowly approved by the House in May and as of today, July 1st, has passed the Senate at a 51-50 vote, with Vice President JD Vance delivering the deciding vote. While the House version of the bill presented massive tax and spending cuts, the Senate provided revisions with a more scaled back approach. The next step for the bill is to move back to the House, where it is anticipated it could face significant opposition due to the numerous changes enacted by the Senate.

Among the most substantial differences the Senate made from the House provisions is to maintain existing Pell eligibility by keeping the full-time definition at 12 credits, keeps subsidized loans for undergraduate borrowers and provides per student limits to Parent Plus loans. The Senate's version still initiates borrowing caps for student loans for graduate and professional students, as well as ending the Grad PLUS loans and capping Parent PLUS loans. Unlike the House who pushed for a skin-in-the-game provision, the Senate kept an accountability measure in place similar to the high school earning premium measure under the GE regulations; however, this would apply to all programs in sectors of higher education- except for undergraduate certificates. Unlike GE, the bill requires an appeals process for programmatic earnings data allowing institutions to showcase the programs student outcomes before losing participation in the Title IV programs.

FSA RELEASES NEW DEFAULT RESOURCE TO AID IN OUTREACH EFFORTS FOR DELINQUENT **BORROWERS**

In our May newsletter, we reviewed the Department of Education's announcement to resume collections on delinquent federal student loans. As part of these efforts, ED requested that institutions perform outreach to remind former students of their repayment obligations. Initial efforts should be focused on students who have one or more loans in delinquent status. To assist in these efforts FSA published a recent Electronic Announcement sharing that ED has made available on the NSLDS Professional Access website, a NSLDS Delinquent Borrower Report (DELQ01).

This report provides institutions with a list of borrowers who have been identified as delinquent in their loan payments to one of the federal loan servicers. The output document includes delinquent borrowers along with their demographic data such as address, phone number, and email address, as well as loan details including loan date, loan type, total outstanding balance, and the current monthly payment amount. This information will assist institutions with their normal delinquency/default prevention efforts as well as the outreach request made by the Department.

Once in the NSLDS Professional Access website, go to the NSLDS Reports Tool, under the Reports Tab. From there, navigate to the Content Folder > Team content folder > NSLDS Folder > Loan & Grant Folder > DELQ01 Delinquent Borrower Report. The report is available in 4 formats depending on your institution's needs (CSV, Large Volume SAIG and CSV download, PDF Download, or SAIG &Excel download). If you opt for the SAIG type it will be sent to the SAIG mailbox on file.

When requesting the report, you can receive all the data at your institution's six-digit OPEID level or enter the eight-digit OPEID to receive data for a specific location. Additional parameters allow you to limit the report output by entering a Federal Loan Servicer Code, a Cohort Year, and/or selecting one or more periods for Days Delinquent. If a Cohort Year is not entered, the report output will return all borrowers with delinquent loans that fall in all periods for Days Delinquent.

FSA IMPLEMENTS SYSTEM CHANGES TO COMBAT IDENTITY THEFT

In an Electronic Announcement released June 6th, the Department recognized a wide spread problem of identity fraud impacting institutions of higher education. The acting Under-Secretary of Education, James Burgeon shared a similar update at the CECU conference in late May, indicating the rate of fraud through stolen identities has reached a level that is severally impacting the FSA programs. In his speech to attendees, he stated that 90 million dollars was distributed to deceased or ineligible students and cited that 30 percent of students at community colleges were in fact, "ghost students". Neither the EA nor the statements from Burgeon have included data sources.

To combat these serious threats, the Department is launching a nationwide effort to eliminate identity theft and fraud in the federal student aid programs for the fall 2025 semester to protect taxpayers while significantly reducing the administrative burden on colleges and universities. Prior to implementation, the Department will require institutions to verify the identity of first-time applicants who complete a FAFSA. This requirement means there will be an uptick in students selected for V4 verification (and as a result V5) during summer-roughly 125,000 students. The ultimate goal is to implement the new selection process in the Fall and eliminate the V4 process altogether through better system functionality.

As part of the Department's fraud prevention efforts, they have enacted several significant changes to the acceptable documentation for identity verification that must be maintained by schools when they perform V4 or V5 verification. Overall, these changes are intended to streamline the verification process and focus on fraud prevention efforts. As of the publication date of this Electronic Announcement:

- 1. Institutions no longer have to collect the Statement of Educational Purpose for V4/V5
- 2. If an applicant can't appear in person for identity verification, they now have the option to appear on a video call and then provide a scanned copy of the forms of identification. This would be in addition to the option to appear before a notary.
 - a. To document the video call, they will require the school to maintain a scanned copy of the identification documentation, including the date it was presented and the name of the authorized individual who reviewed the document. This can be accomplished also through a screenshot of the video call that has the legible details of the identifying document.
- 3. It appears the Dept. will now also consider a student applicant identity verified "if the student's identity was verified by an entity that is compliant with the NIST Identity Assurance Level 2". (it says more information on that coming)

4. For confined or incarcerated individuals, the applicant will be considered verified "if the student's identity was verified by a responsible official at the facility where the individual is confined or incarcerated."

The EA closes with reminding schools that conflicting information must be disbursed prior to awarding aid. With that you, if you suspect that a student, employee, or other individual has misreported information or altered documentation to fraudulently obtain federal funds, you must report your suspicions and provide any evidence to the Office of Inspector General (OIG).

REMINDER: REPORT 2024 CALENDAR YEAR FWS EARNINGS TO COD

In a June 12, 2025 Electronic Announcement, FSA announced the June 29th planned implementation of COD system functionality to enable schools to begin reporting Federal Work Study (FWS) earnings for the 2024 calendar year. Under the FAFSA Simplification Act, school-reported data for the FWS Program is used to accurately calculate the Student Aid Index (SAI) for aid recipients. FWS data reported for the 2024 calendar year will be used in the 2026–27 Free Application for Federal Student Aid (FAFSA) processing cycle.

To better understand what FWS earnings gets reported to the COD system, FSA released a more recent EA on June 25th providing detailed information on what and who to report for this requirement. Schools must report, for each student, the total (both institutional and federal share, as applicable) gross amount of all FWS earnings for any portion of the applicable calendar year. Amounts reported in COD must be rounded to the nearest whole dollar. For the 2026–27 FAFSA processing cycle, schools will be reporting FWS earnings disbursed at their institution from Jan. 1, 2024, through Dec. 31, 2024.

FWS earnings amounts must be reported to the COD System in a manner consistent with the requirements for including such amounts on the W-2 (see General Instructions for Forms W-2 and W-3). Per the "Calendar year basis", the amount of FWS earnings should include all amounts that were paid during the calendar year, from January 1 through December 31, even if the work was performed outside of the calendar year. In addition, any portion of a student's FWS earnings that is paid in the form of non-cash contributions (e.g., payments toward tuition, room, or board, etc.), must be included in the total FWS earnings that are reported to the COD System, except when such non-cash payments are made by a federally approved Work College for work performed under the comprehensive work-service-learning program.

Schools must report for any student who received FWS earnings regardless of that student's enrollment status at the school (i.e., a school will report FWS earnings paid even if the student is no longer enrolled at the school). Because some students may attend different schools, there will be instances where more than one school is reporting FWS earnings for a particular student. The COD System will allow multiple schools to report for the same student. FSA will use the combined total of the student's FWS earnings by all schools in the SAI calculation. Note: Schools will be able to view the total FWS earnings for each student (including other reporting schools and the respective amounts) on the COD website.

As explained in the COD Technical Reference, schools will report FWS earnings information via batch submission using the Campus-Based XML Schema version 1.0b or via the COD website. When reporting data, schools will be required to submit the following information:

- Last name
- Date of Birth
- SSN
- **FPS Transaction Number**
- **Total FWS Earnings**
- Calendar Year

Additional data elements may be submitted. Full details about required and optional fields, valid values, and other business rules are in Volume 4 of the COD Technical Reference.

Note to EDExpress Users: An update for EDExpress for Windows 2025–26, Release 2.0 will be posted at the end of June 2025 and will continue to incorporate the Campus-Based schema version 1.0b and allow for reporting FWS earnings using EDExpress.

Note: The Campus-Based XML Schema 1.0b includes an additional reporting block for FSEOG-related data, but this data will not be collected and will be reserved for future use, if needed.

As noted above, schools will report the total FWS for the 2024 calendar year, however, because the calendar year will overlap two different award years, schools will be able to report FWS data using two different methods:

- 1. Calendar Year Totals by Award Year school submits two totals, one amount for the calendar year portion paid in award year 1 and a second amount for the calendar year portion paid in award year 2.
- 2. Calendar Year Total Amount only school submits one total amount for the full calendar year and no award year information is included.

The EA provides an example table as shown below, displaying information about Student A who was paid FWS earnings of \$300 on each of the listed dates.

Award Year	FWS Payment Dates (\$300 each)	Total FWS Award Year Compensation Paid	Total 2024 Calendar Year for Award Year
2023-24	10/1/2023 11/1/2023 12/1/2023 1/1/2024 3/1/2024 4/1/2024	\$1800	\$900

2024–25	10/1/2024	\$2400	\$600
	11/1/2024		
	2/1/2025		
	2/15/2025		
	3/1/2025		
	3/15/2025		
	4/1/2025		
	5/1/2025		

In this case, for reporting method 1, the school would report two separate FWS amounts of \$900 and \$600. Alternatively, for reporting method 2, the school would report one FWS amount of \$1500. In either option, the amounts paid in 2023 or 2025 would not be reported.

It is important to note a school cannot change the reporting method it chooses after records have been accepted, without first zeroing out all accepted records and starting over. For example, if a school submits a record for the 2024 calendar year with the amount paid during the 2023–24 award year, and it is accepted, a subsequent record that denotes the 2024 calendar year only (but no award year is provided) will be rejected.

The ability for one campus to report on behalf of all locations and/or other main campuses with which it is affiliated is driven by the reporting and attending relationships established in the COD System. These relationships will be set up in accordance with existing relationships between main campuses and their locations, as well as the FISAP reporting structure currently utilized by schools. If your school has an issue with its reporting and attending relationships as established in the COD System, it may submit a request to change them via the FSA Partner and School Relations Center.

To ensure accurate SAI calculations at start-up, it is strongly recommended that schools plan to complete the submission (and COD System acceptance) of FWS earnings for the 2024 calendar year prior to the release of the 2026–27 FAFSA form. Timely advance reporting will also help limit unnecessary subsequent *Institutional Student* Information Record (ISIR) transactions.

IMPORTANT: UPCOMING DEADLINES

As we enter the new 25-26 award year with the start of July, we want to remind you of important deadlines that are upcoming over the next several months.

- July 1st- Deadline for public disclosure of completion and graduation rates.
- July 31st- Closeout deadline for the 23/24 Direct Loan program. (Be sure to read our Compliance Corner for steps to close out)
- August 20th- Campus- Based Reallocation Form Due

- September 13th- Deadline to complete 24/25 ISIR corrections to FPS
 - o Be sure to complete outstanding verification for 24/25 students as this will be the last date to update the ISIR to reflect accurate data after verification.
- September 30th- Deadline to submit all Pell/Teach Grant disbursements to COD for the 24/25 award year
- September 30th- Deadline to submit FVT/GE Reporting and Completer's Lists
- October 1st- Annual Campus Security Report due
- October 1st- 26/27 Fiscal Operations Report and Application to Participate (FISAP) due

FSA PARTNER CONNECT TRAINING: SAIG ENROLLMENT WEBINARS AND RESOURCES

As we mentioned in last month's newsletter FSA Partner Connect will become the primary enrollment and user management service for FSA, allowing partners to enroll for access to FSA services and systems and to exchange information via the SAIG. The SAIG Enrollment site retired June 12, 2025 and enrollment services have been on hold to prepare for the rollout of the functionality on the new site. To prepare users for the new features and functionality offered in FSA Partner Connect, FSA has announced a series of live, instructor-led webinars.

The webinars began on Monday, June 30th and will continue into July. You do not need to register for these webinars. Participation will be available on a first-come, first-served basis and we can accommodate up to 10,000 attendees in each session. The first session was on the Account Access Management Center overview and was intended for individuals who currently serve as an SAIG Primary Destination Point Administrator or those with similar administrative responsibilities at an institution. The remaining two sessions are:

Wednesday, July 2nd 1-2:30pm ET

Summary: With the retirement of the SAIG Enrollment website, learn how to navigate the new process for enrolling for SAIG mailboxes and managing access to FSA systems and services through FSA Partner Connect. This webinar is intended for individuals who currently serve as an SAIG Primary Destination Point Administrator or those with similar administrative responsibilities at an institution.

Wednesday, July 9th 1-2pm ET

Summary: The My Account feature on FSA Partner Connect centralizes access to crucial account information and allows for easy customization of your experience. This webinar provides a refresher for existing features in FSA Partner Connect, along with important updates and new functionality to streamline workflows. This webinar is intended for all FSA Partner Connect and SAIG users.

In addition to the live webinars, FSA will also provide a collection of self-paced training materials, including job aids to walk you through various processes step-by-step. Webinar recordings will also be available. FSA will update the Dear Colleague announcing the webinar trainings when these additional materials are available.



To view these additional resources when they are available, log in to the FSA Training Center as described above and once again select "Systems Training" from the main menu bar. From the drop-down menu that appears, choose "FSA Partner Connect" and then select the "Partner" icon in the middle of the page.

For links to the webinars and how to access, visit the Dear Colleague.

COMPLIANCE CORNER DIRECT LOAN CLOSEOUT

We previously informed you in our December Newsletter of the importance of performing monthly internal and external reconciliation for the Direct Loan Program to ensure a smooth closeout by the deadline. The closeout deadline for the 2023-24 Direct Loan Program Year is Thursday, July 31, 2025. This is the last processing day before the end of the program year. All school data must be received and accepted by this date to be included in the school's final Ending Cash Balance for the year. In this month's Compliance Corner, let's review what institutions must complete to be successfully closed out. The following steps must be completed:

- Reconcile to an Ending Cash Balance of \$0 and Total Net Unbooked Disbursements of \$0, as reflected on your monthly School Account Statement (SAS) Report and in your school's internal records; and
- Complete the School Balance Confirmation form on the Common Origination and Disbursement (COD) website. The School Balance Confirmation form can be completed after the school has reconciled to a \$0 balance both internally and externally. Once the school has completed their final reconciliation, the school should log in to the COD website. From the School options menu, click on the Balance Confirmation link on the left-hand side of the page and follow the instructions on the School Balance Confirmation screen.

Important: When completing the closeout, a school should verify that it has selected the correct program and award year from the dropdown menus.

To meet the closeout deadline, all records must be submitted to the COD System no later than 8 p.m. Eastern time (ET) on Thursday, July 31, 2025. After this deadline, Direct Loan records will not be accepted by the COD System and schools will no longer have Direct Loan funds available to draw down for the 2023-24 award year. In other words, the Department will reduce the school's Current Funding Level (CFL) to the greater of Net Drawdowns or Net Accepted & Posted Disbursements.

In a recent Electronic Announcement, FSA reviewed several other items institutions should consider in completing the close out process. Those elements include:

1. Though the closeout deadline is July 31, 2025, all cash management, disbursement reporting, and monthly reconciliation regulatory requirements supersede this closeout deadline. If a school is meeting these

- regulatory requirements, the final closeout stage should begin no later than the last award end date at the school for a given program and year. A school should be able to reconcile to a zero-ending cash balance and close out soon after its final disbursements and should **not** wait until the closeout deadline.
- 2. All records submitted prior to the closeout deadline must be accepted by the COD System to be included in a school's final ending cash balance for 2023-24. Also, refunds of cash transactions can take 7-9 days to process from G6 to the COD System to be included in your school's balance. Plan accordingly to allow ample time for refunds of cash to be included in your final ending cash balance prior to the deadline.
 - Schools should not use G6 Drawdown Adjustment transactions to move funds from one program, award year or school to reconcile another program, award year or school.
- 3. Exceptions to the last processing day of the program year may be made on a case-by-case basis, if the school's processing period extends beyond the closeout deadline. Schools falling within this category must contact the FSA Partner and School Relations Center at the number for further assistance.
 - Extended processing is not needed to submit decreases to award or disbursement amounts or any nonfinancial changes. If you need to submit increases to award or disbursement amounts or new award or disbursements after the data submission (closeout) deadline, you will need to request an extension to the deadline via the COD website Request Reopen/Extended Processing page. However, you should not submit a request until after you have completed reconciliation of all program records and are ready to submit increases or new award or disbursement data to the COD System.

For additional Direct Loan Closeout information for the 2023-24 program year, schools can refer to the Feb.20, 2025 Electronic Announcement.

Sources: EA- DL-25-02

CALENDAR and RESOURCES

Training Resources

DJA MONTHLY WEBINARS

Campus Security- Wednesday, July 16th, 11 a.m. CST

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, as well as our newsletter recipients on a trial basis. Invitations are automatically sent to all clients, however if you do not receive an invitation, email Lynessa Roberts at lroberts@gotodja.com. After registering, you will receive the log-in information. If you would like to attend a webinar and are not a DJA client, please email Lynessa and she will ensure you receive an invitation to register. Questions can be directed to Lynessa by email or by calling toll free at 1-800-242-0977.

2025 DJA WEBINAR SCHEDULE

JUL 16	Campus Crime Report
AUG 6	Entrance and Exit Counseling
SEPT 3	Cash Management
OCT 8	Enrollment Reporting Using NSLDS
NOV 5	Program Integrity (Audits, Program Review)
DEC 3	1098-T Reporting

2025 TITLE IV DATES TO REMEMBER

We know how complex the compliance requirements can be for schools participating in the Title IV programs, as can keeping up with all the reporting deadlines year to year. To asset our clients and other institutional partners, we have developed a quick reference calendar reviewing the important deadlines for the year 2025. For a printed color copy, visit us at any of our upcoming exhibitor events or to print your own copy, click here.

<u>Upcoming Conference Schedule</u>

Our DJA team will be taking off July- August for conference visits; however, we will return in September for the NACCAS Workshop and CSPEN Annual Conference. For a complete listing of where to find DJA at upcoming industry conventions and conferences, visit our exhibiting calendar at our website here.

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.