



800.242.0977

djainfo@gotodja.com

P.O.Box 456

Wichita, KS 67002

SEPTEMBER/OCTOBER 2025 NEWSLETTER

IMPORTANT DATES:

September 30

CDR Appeals Open

October 23-24

Prestige Annual Conference
Miami, FL

October 24-26

AACS Annual Conference
Miami, FL

October 31



November 5

DJA Compliance Webinar
Program Integrity
11 a.m., CST

November 10-13

COE Annual Conference
Austin, TX

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As the leaves turn and pumpkin spice takes over, the air isn't the only thing getting a little chilly—Washington has gone cold too. The government shutdown has now stretched into day 22, and the effects are being felt far beyond the Capitol. With agencies operating on skeleton crews and many federal employees furloughed, the impact on institutions of higher education has been significant.

Our team has already seen the ripple effects firsthand: E-App update approvals have slowed to a crawl, and FSA ticket response times have grown longer as schools wait for assistance and clarification. It's a chilling reminder of how connected our work is to the federal system—and how quickly things can stall when that system grinds to a halt.

But don't be scared—our team is here to help you navigate this haunted season of compliance, deadlines, and ever-changing regulations. In this edition, we'll break down what the shutdown means for your operations, share key updates, and provide practical guidance to keep your institution moving forward—even when Washington isn't.

While new announcements on the FSA Knowledge Center have largely been silent during the shutdown, September did bring the release of the FY2022 Official Cohort Default Rates, as well as the early launch of the 26/27 FAFSA. In this month's edition, we provide guidance on reviewing the CDR, as well as the ability to appeal the data. While the period for appeal opened in late September, the deadline for completion is quickly approaching.

October may be well known for the spooky season, but it is also Cybersecurity Awareness Month. Nothing sends chills down a school's spine quite like a data breach—a nightmare to contain and even harder to recover from. Tune into our Compliance Corner for practical strategies to stay protected from digital tricks and traps.

Until next month, stay informed and engaged,

Renee Ford, Vice President



IN THE NEWS: GOVERNMENT SHUTDOWN CONTINUES

Congress missed the September 30th deadline to finalize approval of the FY2026. With no Continuing Resolution (CR) passed by the Senate, the federal government has officially shut down. As of this newsletter's publication, the shutdown has continued into Day 20. The Senate is planning to reconvene for the 11th time on advancing a House-passed measure to fund the government and end the current shutdown.

The Department of Education released [its contingency plan](#) earlier this week providing confirmation that Pell Grants and Federal Direct Loans will continue to be disbursed as they are considered mandatory funding. ED also reminded student loan borrowers they would still be required to make loan payments on outstanding debt should a government shutdown occur. The plan published by ED indicates that over 80% of their staff will be furloughed if federal funding appropriations lapsed and a shutdown occurred.

Typically, during a government shutdown, most rulemaking is also paused; however, ED has indicated the negotiations currently taking place within the Reimagining and Improving Student Education (RISE) committee are essential to meet the OBBBA's statutory deadlines and as a result will continue amidst the pause. The RISE committee began negotiations on Monday, September 29th. The focus of the committee will be in carrying out the regulatory stipulations outlined in the OBBAA in regard to federal student loan eligibility, limits, repayment and rehabilitation.

The Department released an EA shortly after the announced shutdown citing there would be minimal impact on FSA's partners and their ability to participate in the Title IV programs. The [EA](#) also provided detailed information on FSA's operations, including impact on communications, customer service contact centers, processing systems, and training events. As stated in our opening remarks, while FSA support is still intact, the delays in approvals and ticket response are still being felt by industry partners.

During this time, institutions should be reminded of their ability to self-certify certain institutional and programmatic changes. We encourage you to visit the [FSA Handbook, Volume 2, Chapter 5 Updating Application Information](#). If utilizing the PDF version, navigate to Page 10 where it reviews reporting Substantive Changes. We do remind schools for changes that require ED approval, if not obtained in advance and your school proceeds with self-certification, the school is liable for the Title IV funds disbursed to students. There are some limitations to this workaround for programmatic additions/changes as noted below:

- the school has been provisionally certified,
- the school is receiving funds under the reimbursement or heightened cash monitoring system of payment,
- progress in the program is measured by direct assessment (unless the Department has previously approved a direct assessment program at the institution at the same level of offering),
- The addition of the first Prison Education Program (PEP) at the first two additional locations.
- the school is subject to the two-year rule,
- the program is a comprehensive transition and postsecondary program,
- it is an undergraduate short term program, or
- the Department has informed the school that it must request approval before adding additional programs.



For DJA clients, we cover all potential changes and how best to report (or self-certify) in our June Monthly Compliance Webinar on General Participation Requirements. To review the recording or slide handouts, login to the Client Access Portal and navigate to the 2025 Monthly Compliance Webinars.

OFFICIAL COHORT DEFAULT RATES FOR FY2022 RELEASED

On September 22, 2025, ED distributed the [FY 2022 official cohort default rate](#) (CDR) notification packages and accompanying documentation via the Student Aid Internet Gateway (SAIG) to all eligible schools. Institutions will NOT receive a FY 2022 Official CDR notification page if the school did not have a borrower in repayment, during the current or any of the past cohort default rate periods. Additionally, schools not enrolled in eCDR will not receive an eCDR notification package. Schools may download their cohort default rate and accompanying Loan Record Detail Reports from the National Student Loan Data System (NSLDS) via the NSLDS Professional Access website. The period for appealing the FY 2022 official CDR under 34 C.F.R Part 668, Subpart N began on **Tuesday, September 30, 2025**, for all schools.

Each CDR package contains a Cover Letter file (message class SHDRLROP) and an Extract-Type Loan Record Detail Report (message class SHCDREOP). The FY 2022 CDRs were calculated using the cohort of student loan borrowers who entered repayment on their William D. Ford Federal Direct Loan Program or Federal Family Education Loan (FFEL) Program loans between Oct. 1, 2021, and Sept. 30, 2022, and who defaulted between Oct. 1, 2021, and Sept. 30, 2024. The Loan Record Detail Report (LRDR) is no longer provided through the SAIG mailbox in a Reader-Friendly Excel version. NSLDS provides an [LRDR Import Tool](#) to assist in converting the reports provided into Excel.

If you decide to appeal, you must use the electronic Cohort Default Rate Appeals (<https://ecdrappeals.ed.gov/ecdra/index.html>) System for the following appeals and adjustments:

- Loan Servicing Appeals
- Uncorrected data Adjustment
- New Data Adjustment

As a reminder, schools must submit the following appeals electronically via password secured email as **paper submissions will not be accepted** as that option was removed in 2020:

- Economically Disadvantaged Appeal
- Participation Rate Index Appeal
- Erroneous Data Appeal

You will need to send these appeals to fsa.schools.default.management@ed.gov with a copy (cc: to mary.mcgeorge@ed.gov). Make sure to label the subject line of the email as: **FY 2022 Official [Insert appeal type], OPEID**.



As a reminder, eCDR Appeals is a web-based application that allows schools to electronically submit certain adjustments/appeals requests during the specified timeframes. The application allows data managers (guaranty agency or federal loan servicer) and Federal Student Aid personnel to electronically view and respond to these adjustments/appeals. The application tracks the entire life cycle of each request from the time the case is submitted until the time a decision is made and the case is closed.

To complete an adjustment or appeal, you may need the data manager's contact information. Click on the [“Alphabetical and Numerical Data Manager Contacts” link](#) from the home page of the Default Management Topics page on the Knowledge Center.

If the Department revises a school's cohort default rate based on its adjustment or appeal submission, the revised cohort default rate will be available on the [Default Management Topics page](#).

For specific information regarding eCDR Appeals, visit the [eCDR Appeals website](#) where you will find user guides for each of the challenge and adjustment processes, as well as a user guide for the registration process. Additionally, you will find links to recordings of eCDR Appeals demonstration sessions to assist first-time users.

While the CDR's released reflect the “Official” release (versus the Draft release in February), it is still necessary for your school to review your LRDR during this cycle. It is important to review for accuracy the data used to calculate the official cohort default rate if a school finds errors in the data, it may be eligible to file certain adjustments or appeals. For a better understanding of how to make sense of the data contained in your LRDR, I recommend visiting Chapter 2.3 of the [CDR Guide](#) for more details in navigating this report. **The deadline and timeline for filing vary based on whether your school is filing an adjustment or the type of appeal. A helpful chart to reference is in [Appendix A of the CDR Guide](#).**

FSA also released the national briefing for the FY 2022 CDR Rates. As expected, FY 2022 CDRs were significantly impacted by the pause on federal student loan payments that began March 13, 2020. During the pause, borrowers with student loans held by the U.S. Department of Education (ED) were not required to make any payments, and no borrowers with ED-held loans entered default. To read the briefing, you can visit the EA [here](#).

LAUNCH OF THE 26/27 FAFSA AHEAD OF SCHEDULE

Following a two-phase beta testing period of the 26/27 FAFSA, the application was released ahead of schedule on September 24th. There are two new features added to the 26/27 Award Cycle with the aim to provide major improvements by simplifying the application process for students and families.

- **Real-Time Identity Verification:** As of August, all users who create a StudentAid.gov account with a Social Security number (SSN) will have their accounts verified immediately, instead of the current one-to-three day waiting period. This will allow for the immediate transfer of tax information from the IRS. Users who do not have a SSN will continue to follow identity validation processes outlined in [GEN-23-123](#).

- **Simplified Contributor Invite Process:** Students completing a 26/27 FAFSA form will be able to invite a parent or spouse as a contributor simply by entering their email—instead of asking students for a contributor’s personally identifiable information—which will generate a unique, non-case sensitive code. The code will be sent to the parent or spouse by email. The parent or spouse will be directed to accept the invite by entering the code on an “Accept an Invite” page that can be accessed by the email or StudentAid.gov once they are logged in. The Department expects this update to ease the process for users and reduce errors associated with matching contributors to their accounts based on identifying information. If a contributor begins a FAFSA on behalf of a student, they will use the existing process to invite the student to the form. In that case, the student must have a StudentAid.gov account and will be linked immediately to the application upon being invited.

While the 26/27 FAFSA has been released, awarding aid for the upcoming award year faces a couple challenges. Firstly, with the fiscal budget still under consideration, it is unclear the future of the Campus-Based programs as the FSEOG program is slated for elimination and the FWS program faces a severe budget cut reducing the federal contribution to 25%. Secondly, under the OBBBA, institutions will be required to prorate annual loan amounts in direct proportion to the percent of full-time status a student is enrolled. The latter is currently under negotiated rulemaking and guidance will be forthcoming. Additionally, FSA has yet to publish the FAFSA Information to be Verified for the 26/27 Award Year. In prior years, this was released in September prior to the October release of the FAFSA.

Following the launch of the 26/27 FAFSA, the Department also published the [26/27 College Financing Plan](#) on their Office of Postsecondary Education [website](#). The College Financing Plan (CFP) is a legacy consumer tool that was developed as an option for institutions to use to notify students about their financial aid packages. It is intended primarily for prospective students to receive information about costs and financial aid so that they can easily compare institutions and make informed decisions about where to attend school. Use of the plan is voluntary, though schools are encouraged to adopt it for their students. Also, for schools that receive federal funds under the military and veterans’ educational benefits programs, using the plan helps meet a disclosure requirement of Executive Order 13607. DJA clients can find the plan live in New Leaf and found under the Lead status.

IMPORTANT: UPCOMING DEADLINES

As we approach the end of the award year, we want to capture upcoming deadlines. Looking ahead into 2026, DJA has revamped our Title IV dates to remember to reflect the new calendar year. Please note at this time, the dates are estimations as the Department has not yet released the Dear Colleague on the 25/26 Award Year Deadline Dates for Reports and Records Associated with the FAFSA. This DCL is typically released in September prior to the October release of the FAFSA.

- October 30th: Deadline for *most* CDR Appeals.
- November 1st: FIRE System Open for testing. Planned outage 11/19-1/6/26.
 - FYI: FIRE is being replaced by the new Information Returns Intake System (IRIS) for the 2027 filing season



- December 10th (estimate): Deadline for Active Confirmation of TG/FT Numbers
 - Waiting for this year's EA. For guidance, visit last year's [EA](#)
- December 12th: NACCAS 2024 Annual Data Report due. File [here](#).
- December 15th: Deadline for 26/27 FISAP edit corrections
- January 31: Copy B of the 1098-T statement due to students
 - DJA Clients are encouraged to attend our webinar in December on 1098-T reporting

COMPLIANCE CORNER

CYBERSECURITY AWARENESS MONTH

October is recognized as Cybersecurity Awareness Month under an international initiative that educates everyone about [online safety](#) and empowers individuals and businesses to protect their data from cybercrime. The recognition began in 2004 when the National Cybersecurity Alliance (NCA) and the U.S. Department of Homeland Security made the declaration. As the digital world continues to evolve, so does the importance of cybersecurity. The newsletter highlights three solutions institutions and digital users can enact to improve your school's online safety.

1. Enable Multifactor Authentication (MFA)- as an institution participating in the Title IV programs, MFA is now a requirement under the Safeguards Rule within the Gramm Leach Bliley Act (GLBA). MFA requires users to prove their identity in multiple ways. In addition to entering a username and password, users must prove their identity by acknowledging the logon attempt on an authenticator app, entering a code, or using facial ID. MFA provides an added layer of cyber defenses by making it difficult for hackers to access accounts, even if a password is stolen. Enabling MFA on all accounts and systems that allow it can protect individuals and organizations from potential breaches.
2. Protect your network from a Ransomware attack. Ransomware is malicious software designed by cybercriminals to deny a user or organization access to their data. If your system is infected with ransomware, stay calm, shut off networks and systems to limit spread. Additionally, it is recommended you apply the following tips and practices to avoid an attack (provided through the [Stop Ransomware campaign](#))
 - a. Promote good cyber hygiene habits in order to keep your network healthy. Examples would be to enact a clean desk policy to ensure PII is removed when the desk space is vacated, conduct regular vulnerability scanning to identify and address vulnerabilities.
 - b. Maintain offline, encrypted backups of data and regularly test your backups. Educate your team that these backups exist so they know the ransomware threat can be managed by restoring databases pulled from the offline backup.
 - c. Don't be afraid to report ransomware attacks. When in doubt, it is best to get in front of a ransomware attack and engage federal authorities for technical assistance.
 - d. Stay current with regular patch releases and update software and operating systems once received. Delaying or ignoring a software patch could be just the opening a cybercriminal needs to stage a ransomware attack.



3. In addition to staying current with regular software patches, organizations should stay current with all software updates. According to the NCA, two out of five respondents report “sometimes,” “rarely,” or “never” downloading software updates. Software weaknesses are exploited by hackers and can lead to breaches and exposure of sensitive information.

For more cybersecurity resources, visit the NCA website and their coverage on the [Cybersecurity Awareness Month](#).

CALENDAR and RESOURCES

Training Resources

DJA MONTHLY WEBINARS

Program Integrity- Wednesday, November 5, 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

NOV 5	Program Integrity (Audits, Program Review)
DEC 3	1098-T Reporting
DEC 10	Newly Added Special Series: File Review, Verification & Resolving Conflicting Information

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 assist our clients and other institutional partners, we have developed a quick reference calendar reviewing the important deadlines for the 2025 year. We will publish the 2026 edition as soon as the Department releases the 25/26 Award Year Deadlines. For a printed color copy, visit us at any of our upcoming [exhibitor events](#) or to print your own copy, click [here](#).



Upcoming Conference Schedule

American Association of Career Schools Annual Conference

The 2025 AACCS Annual Conference is hosted in Miami, Beach at the iconic Fontainebleu hotel. The event kicks off with a welcome session on Thursday, October 23rd and continues through the weekend ending with the Masquerade Ball on Saturday evening, followed by a celebration brunch Sunday morning. It is a challenging year for this regulated industry with the pending changes under the One Big Beautiful Bill Act, so this year's Annual Conference is a must attend event. From business networking to industry best practices, to the most recent updates regarding compliance regulations and the release of the 26/27 FAFSA, there will be sessions of interest for everyone on your school's leadership team. DJA will be an exhibitor at this conference and would love to connect your team to discuss the advantages of partnering with our team on financial aid processing. Please visit us at booth 309 and grab a notepad and pen to serve you throughout the conference. For more information, visit myaacs.org.

Council on Occupational Education Annual Meeting

The COE Annual Meeting will be held at the Marriott Austin Downtown this year. Only accredited institutions or those in candidate status with COE should attend the meeting. The event will include workshops required for institutions with an upcoming initial or reaffirmation accreditation visit. Training will be offered for individuals interested in serving on accreditation visiting teams as a member or leader. Additionally, there will be workshops focused on maintaining accreditation with COE. The event will also include special recognitions, awards, and a COE Business Meeting. Attendees will also have the ability to network with participating vendors in the Thought Partner Café. DJA will have a booth and we would love for you to stop by and visit with our Vice President, Renee Ford in between sessions. For more information, visit [here](#).

NACCAS Quarterly Workshop December 5-8

NACCAS is hosting their final 2025 quarterly Workshop in New Orleans, LA at the InterContinental hotel, with pre-candidate training on Saturday December 6th and workshop sessions the following Sunday and Monday. DJA will be available as an exhibiting partner. We invite you to stop by our booth for a yearly calendar of Title IV deadlines, a copy of our most recent newsletter and a notebook and pen to utilize throughout your training. We would love to discuss how partnering with DJA can be a great addition to ensuring compliance with Title IV financial aid administration.

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.

