SESSION FOREIGN SCHOOLS #2

Cash Management and Disbursements for Foreign Schools

Byron Scott
U.S. Department of Education

2020 Virtual FSA Training Conference for Financial Aid Professionals
AGENDA

- Accounting Requirements
- Student Disbursements
- Funding Process
- William D. Ford Federal Direct Loan (Direct Loan) Program Reconciliation
ACCOUNTING REQUIREMENTS
STANDARD OF CONDUCT

• A school acts as a fiduciary of Title IV funds
  • A fiduciary is subject to the highest standards of care and diligence in administering the programs and accounting for the funds received
  • Schools must act with the competency and integrity to qualify as a fiduciary
• Also applies to a Third-Party Servicer
SEPARATION OF DUTIES

• Schools must divide the functions of authorizing payments and disbursing or delivering funds
  • Organizationally independent
  • Not members of same family

• Schools must have an adequate system of checks and balances within its system of internal controls

• See 34 C.F.R. § 668.16(c)
USE OF FUNDS

- A participating school is a trustee of federal funds
  - Schools may not use Title IV funds for anything other than their intended purposes
  - Schools may not use Title IV funds as collateral for any purpose
- Funding is specific for each program and for each award year
  - Funding is not student specific
ACCOUNTING AND RECORDKEEPING

• Schools must maintain, on a current basis
  • Financial records that reflect all program transactions
  • General ledger control accounts and related subsidiary accounts identify all program transactions and separate those transactions from all other transactions
    • Program subsidiary ledgers
    • Credit balance ledgers
• See 34 C.F.R. § 668.24(b)
### Federal Direct Loan Ledger
2020-21 Award Year

<table>
<thead>
<tr>
<th>Transaction</th>
<th>Date</th>
<th>Student Payment/Refund</th>
<th>U.S. Treasury Draw/Refund</th>
<th>Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Treasury Receipt</td>
<td>Oct. 14, 2020</td>
<td></td>
<td>$8,412.00</td>
<td>$8,412.00</td>
</tr>
<tr>
<td>Student A Subsidized Disb 1</td>
<td>Oct. 15, 2020</td>
<td>$1,732.00</td>
<td></td>
<td>$6,680.00</td>
</tr>
<tr>
<td>Student A Unsubsidized Disb 1</td>
<td>Oct. 15, 2020</td>
<td>$990.00</td>
<td></td>
<td>$5,690.00</td>
</tr>
<tr>
<td>Student B Subsidized Disb 1</td>
<td>Oct. 15, 2020</td>
<td>$2,721.00</td>
<td></td>
<td>$2,969.00</td>
</tr>
<tr>
<td>Student B Unsubsidized Disb 1</td>
<td>Oct. 15, 2020</td>
<td>$2,969.00</td>
<td></td>
<td>$0.00</td>
</tr>
<tr>
<td>Student X PLUS refund</td>
<td>Nov. 10, 2020</td>
<td>($5,200.00)</td>
<td></td>
<td>($5,200.00)</td>
</tr>
<tr>
<td>U.S. Treasury Refund</td>
<td>Nov. 13, 2020</td>
<td></td>
<td>($5,200.00)</td>
<td>$0.00</td>
</tr>
</tbody>
</table>
STUDENT DISBURSEMENTS
TITLE IV DISBURSEMENTS

- Defined as the date that the institution credits a student’s account at the school or pays the student directly with –
  - Funds received from the Department
  - Institutional funds used in advance of receiving funds from the Department
## Student Disbursement Example

### Student Account Record

**Student:** Santa Claus

<table>
<thead>
<tr>
<th>Date</th>
<th>Transaction</th>
<th>Reference</th>
<th>Charge/Debit</th>
<th>Payment/Credit</th>
<th>Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Oct. 2020</td>
<td>Autumn 2020 Tuition</td>
<td></td>
<td>£ 5,000.00</td>
<td></td>
<td>£ 5,000.00</td>
</tr>
<tr>
<td>15 Oct. 2020</td>
<td>Subsidized DL Disb 1</td>
<td>DL 20-21</td>
<td>£ 2,058.68</td>
<td>£ 2,941.32</td>
<td>£ 2,941.32</td>
</tr>
<tr>
<td>15 Oct. 2020</td>
<td>Unsubsidized DL Disb 2</td>
<td>DL 20-21</td>
<td>£ 749.03</td>
<td></td>
<td>£ 2,192.29</td>
</tr>
</tbody>
</table>
DISBURSEMENT REPORTING TO COD

- The Common Origination and Disbursement (COD) system must reflect the actual date of disbursement to the student account
  - Report as early as seven days before actual (true) date of disbursement
  - Report no later than 15 days of crediting the student’s account
  - Interest begins to accrue on the actual disbursement date reported by the school

- If funds were not disbursed to the student account on the original date reported to COD, the COD record must be updated to reflect the actual date the funds were posted to the student’s account

- A valid Direct Loan Master Promissory Note (MPN) for the academic year must be on file with COD before submission of actual disbursement records
DIRECT LOAN BOOKING

• A loan is considered “booked” when COD has accepted the origination record, MPN, and the first actual disbursement

• A booked loan is a debt owed by the borrower

• Booked loans are transmitted to a federal loan servicer for maintenance and collection
  • After booking, the servicer notifies the borrower of the disbursement, loan terms and conditions, and servicer contact information
  • Subsequent disbursements are assigned to the same servicer
  • Servicer will communicate with the borrower when it receives information about subsequent disbursements
### REQUIRED NOTICES

<table>
<thead>
<tr>
<th>What</th>
<th>Who Is Notified</th>
<th>When</th>
<th>Required Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type and amount of FSA funds student will receive</td>
<td>Student</td>
<td>Prior to disbursement</td>
<td>Type and amount of FSA funds available; How and when funds will be disbursed; If Direct Loan funds, amount of subsidized and unsubsidized</td>
</tr>
<tr>
<td>Credit of any loan funds to student’s account if affirmative confirmation obtained*</td>
<td>Student (or parent, if Parent PLUS loan)</td>
<td>Within 30 days of disbursement (either before or after the disbursement)</td>
<td>Date and amount of disbursement; Right of borrower to cancel all or portion of loan; Procedures and deadlines for borrower to cancel the loan</td>
</tr>
<tr>
<td>Credit of any loan funds to student’s account if affirmative confirmation is NOT obtained</td>
<td>Student (or parent, if Parent PLUS loan)</td>
<td>No earlier than 30 days before, and no later than 7 days after disbursement</td>
<td>Date and amount of disbursement; Right of borrower to cancel all or portion of loan; Procedures and deadlines for borrower to cancel the loan</td>
</tr>
</tbody>
</table>
REQUIRED AUTHORIZATIONS

• Use of stored value card or similar instrument for issuing a Title IV credit balance

• Use FSA funds to pay for allowable charges other than tuition, fees, and room and board (if the student contracts with the school)
  • Includes books and supplies

• Holding Title IV credit balances

• Disbursing Title IV funds by EFT to a bank account designated by the student or parent

• See 34 C.F.R. § 668.165(b)
ALLOWABLE CHARGES

- May only credit student’s account for allowable charges
  - Current charges for tuition, fees and room and board if contracted with the school
  - Current charges for educational activities if student and/or parent provides written authorization
    - Includes books, supplies and other equipment
PRIOR-YEAR CHARGES

- Title IV funds can be used to pay minor prior year charges only up to $200
- For Direct Loan recipients, the “year” is the loan period
- Student/Parent cannot provide authorization to pay for more than $200 in prior year charges
Title IV funds credited exceed total allowable charges assessed by the institution.
PAYING TITLE IV CREDIT BALANCES

• School must pay credit balance to student/parent no later than –
  • 14 calendar days after credit balance occurs, if it occurs after first day of classes of payment period
  • 14 calendar days after first day of classes if it occurs on or before the first day of classes of payment period

• Payments via check are considered paid on the date –
  • School mails the check
  • Notifies student within 14-day timeframe that the check is available for pick-up and provides specific location
    • Can hold for 21 days from notification
    • If not picked up, must mail, initiate electronic funds transfer (EFT) or return to the Department
PAYING TITLE IV CREDIT BALANCES

• Schools are prohibited from charging students a fee for delivering FSA funds

• If a school delivers FSA funds by crediting funds to a school-issued debit card, students cannot be charged a fee for making withdrawals of FSA funds from the card

• If students/parents are required to open a bank account, or the school opens a bank account for the student, student/parent consent is required

• Student must not incur any cost in making cash withdrawals from convenient bank branch or ATM
HOLDING TITLE IV CREDIT BALANCES

• Student or parent may voluntarily authorize school to hold credit balance
  • Exception: Schools receiving Title IV funds under a heightened cash monitoring or reimbursement payment method may not retain Title IV credit balances

• School must –
  • Identify amount of funds held for each student/parent in subsidiary ledger account
  • Maintain cash equal to credit balances held

• School may retain interest earned on retained funds

• School must release any remaining Title IV credit balance funds by the end of the loan period
  • May not go beyond this deadline even with student or parent authorization
EARLY DISBURSEMENTS

• Term-based credit hour program
  • 10 calendar days before the first day of classes of the term

• Non-term credit hour and clock hour programs
  • Later of –
    • 10 calendar days before the first day of classes of the payment period, OR
    • The date the student completed the previous payment period
    • This means that if your graduate programs are non-term for Title IV purposes, you cannot make the second disbursement of loan funds until the student successfully completes the first payment period
LATE DISBURSEMENTS

- For Direct Loan recipients, a disbursement made after the student is no longer enrolled at least half-time
  - The loan must be originated prior to the date the student loses eligibility
  - May not originate a new loan or increase an existing loan amount if student is not enrolled at least half-time
- Used for educational expenses incurred while student was enrolled and eligible
- Must be made no later than 180 days after the student became ineligible
- If student is eligible, school must offer the late disbursement to the borrower and release the funds if timely authorized by the borrower
LATE DISBURSEMENT ELIGIBILITY

• First-time, first-year borrowers must have completed 30 days of the program unless the institution is exempt from the delayed disbursement requirement under 34 C.F.R. § 685.303(b)(5)

• For a second or subsequent disbursement, student graduated or completed the period for which the loan was intended

• The Department processed a SAR/ISIR with an official Expected Family Contribution (EFC) before the student became ineligible

• The school must have a valid SAR/ISIR by the deadline established by the Department in order to make the late disbursement
POST-WITHDRAWAL DISBURSEMENT

Post-Withdrawal disbursements are a type of late disbursement with eligible amounts determined by Return to Title IV (R2T4) rules.

If certain conditions are met, the school must offer the post-withdrawal disbursement.
LOAN POST-WITHDRAWAL DISBURSEMENT

- School must provide written notification within 30 days of date of determination of withdrawal
- Must receive confirmation from the student or parent borrower prior to disbursement
- If confirmation received after the deadline, the school may or may not disburse
  - If not disbursed, school must notify the borrower in writing of the outcome
- Must be made as soon as possible, but no later than 180 days after date of determination
School makes or schedules actual disbursements to student accounts

School reports actual disbursements to COD

COD accepts actual disbursement records and raises Current Funding Level (CFL) to amount of accepted actual disbursements

School requests funds from G5 for transfer to school's bank

G5 transfers funds to school's federal funds account

COD sends CFL amount to G5. G5 raises Authorization to match CFL

School transfers funds from federal funds account to operating account

School transfers funds from federal funds account to student accounts

COD accepts actual disbursement records and raises Current Funding Level (CFL) to amount of accepted actual disbursements

G5 transfers funds to school's federal funds account

School requests funds from G5 for transfer to school's bank

School makes or schedules actual disbursements to student accounts
DIRECT LOAN CURRENT FUNDING LEVEL

• Foreign schools operate on a “records first” basis to establish or increase Current Funding Level (CFL)
  • This is called the Current Funding Level in COD and the authorization in G5

• Schools submit actual disbursement records to COD
  • Actual disbursements are those where the Disbursement Release Indicator (DRI) is marked “True”

• COD sends data for accepted actual disbursements to G5 to create or increase authorization

• G5 makes funds available in the amount of accepted disbursements
**G5 AUTHORIZATION PROCESS**

<table>
<thead>
<tr>
<th>If active disbursements are in COD Action Queue by...</th>
<th>Generally funds will be ready for drawdown in G5 by...</th>
</tr>
</thead>
<tbody>
<tr>
<td>10:00 a.m. (ET) on a business day</td>
<td>2:00 p.m. (ET) on the same business day</td>
</tr>
<tr>
<td>10:00 p.m. (ET) on a business day</td>
<td>7:30 a.m. (ET) on the next business day</td>
</tr>
</tbody>
</table>

Funds for disbursement sent to G5 on a non-business day will be available on the next business day.
G5 FUNDING PROCESS

• Schools request funds from G5 and the timing of receipt of funds is based on the location of the school’s bank account

• Foreign Bank Account
  • Deposit by close of business of the third business day following the funds request

• U.S. Bank Account
  • Deposit by close of business of the second business day following the funds request

• Business day
  • If funds are requested prior to 1:00 p.m. Eastern US Time, the day of the request is the first business day
  • If funds are requested after 1:00 p.m. Eastern US Time, the day after the request is the first business day
MANAGING FEDERAL FUNDS

- Schools must not request funds that exceed their immediate need for those funds
  - Funds received from G5 must be disbursed to students within three business days of receipt
- Excess Cash
  - Any amount of Title IV funds not disbursed to students by the end of the third business day after receipt
RETURNING FUNDS

• Direct Loan funds are school and award-year specific, not student specific

• Funds not disbursed to a student, or returned from a student’s institutional account, may be disbursed to another eligible student within the regulatory timeframes
  • Be sure to report downward adjustment to COD for student not receiving funds

• Returned funds that cannot be disbursed to another eligible student must be returned to the Department
  • This is referred to as a refund in both G5 and COD
RETURNING TITLE IV FUNDS

• The Department considers a school to have returned FSA funds when the school has –
  • Deposited or transferred the funds into its federal funds account for disbursement to another student
  • Initiated an electronic funds transfer to the Department in US dollars

Remember! Once funds are deposited into the school’s federal funds account, the money must be returned to the Department or disbursed to another eligible student within the three-business day excess cash timeframe.
METHODS FOR RETURNING FUNDS

- U.S. bank account
  - Use G5 e-Refunds process
    - First time user must designate a U.S. bank account from which the funds will be returned
    - Can be your federal funds account
- Foreign bank account
  - Wire refunds to G5
  - See “Funding Process Overview” on Foreign Schools Information page for details
DIRECT LOAN RECONCILIATION
DIRECT LOAN RECONCILIATION

• Review
  • Title IV funds received from G5
  • Actual disbursement records accepted by COD
  • School Account Statement (SAS)
  • School internal accounting records (actual disbursements posted to student accounts)

• Direct Loan funds are required to be reconciled monthly
RECONCILIATION PROCESS

Your School’s Business Office Records (cash drawdowns, student account credits, statements etc.)

Your School’s Financial Aid Office Records (origination and disbursement records, adjustment records, etc.)

Resolve any/all discrepancies

Reconcile INTERNALLY!!
Total drawdowns = total net disbursements

Does everything MATCH?

NO?

COD Sends Direct Loan School Account Statement (DLSAS) to school (electronically via SAIG)

YES!
RECONCILIATION PROCESS (CONTINUED)

1. Compare reconciled school records to DLSAS.
2. Does everything MATCH?
   - Yes: You're DONE! File everything and do it all again next month!
   - No: Resolve any/all discrepancies and go back to step 1.
RECONCILIATION COMPLETION

• Reconciliation is complete when –
  • All discrepancies have been identified and resolved
  • Timing issues are tracked for reconciliation in next month’s SAS
  • All monthly reconciliation efforts have been documented
  • Reasons for any Ending Cash Balance have been identified
PROGRAM YEAR CLOSEOUT

• Should begin as soon as final disbursements are made
• One final month of reconciliation
• Must resolve any remaining ending cash balance
• Final deadline: Last business day of July of the calendar year following the end of the award year
  • Deadline for 2019-2020 Award Year is July 31, 2021
REGULATORY REFERENCES

- 34 C.F.R. § 668.16(c), Standards of Administrative Capability
- 34 C.F.R. § 668.24(b), Record Retention, Fiscal Records
- 34 C.F.R. § 668.82, Standard of Conduct
- 34 C.F.R. § 668 Subpart K (668.161 to 668.166), Cash Management
- 34 C.F.R. § 685.300(b)(5), Requirement to reconcile Direct Loan program funds monthly
To contact the Department with follow-up questions about this session:

Email: FSA.Foreign.Schools.Team@ed.gov

Phone: 202-377-3168

Fax: 202-377-3486

Mail:
U.S. Department of Education
Multi-Regional and Foreign Schools Participation Division
Union Center Plaza, 7th Floor
830 First Street, NE
Washington DC, 20202 (20002-5340 if overnight/courier)
SCHOOL ELIGIBILITY AND OVERSIGHT SERVICE GROUP (SEOSG)
Nancy Gifford – Acting Director, School Eligibility and Oversight Service Group
215-656-6436
School Eligibility and Oversight Service Group General Number: 202-377-3173 or email: CaseTeams@ed.gov
Or call/email the appropriate School Participation Division below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, and school closure information.

New York/Boston School Participation Division
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, New Jersey, New York, Puerto Rico, Virgin Islands
E-mail Mailbox: NYBostonSPD@ed.gov
Betty Coughlin, Division Chief 646-428-3737
Chris Curry – New York 646-428-3738
Jennifer Uhli – Boston 617-289-0121
Teresa Martinez – New York 646-428-3748

Philadelphia School Participation Division
District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia
E-mail Mailbox: PhiladelphiaSPD@ed.gov
Sherrie Bell, Acting Division Chief 202-377-3349
Bronsdon Thompson – Philadelphia 202-377-3747

Multi-Regional and Foreign Schools Participation Division
E-mail Mailbox: Multi-RegionalSPD@ed.gov
FSAPCForeignSchools.Team@ed.gov
Michael Frola, Division Chief 202-377-3364
Mark Busskohl – Washington, DC 202-377-4572
Michelle Allred – Dallas 214-661-9466
Julie Arthur – Seattle 206-615-2232
David Garza – Dallas 214-661-9694

Atlanta School Participation and Financial Analysis Division
Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina
E-mail Mailbox: AtlantaSPD@ed.gov
Christopher Miller, Division Chief 404-974-9297
Vanessa Dillard – Atlanta 404-974-9418
Vinita Simpson – Atlanta 404-974-9260

Dallas School Participation Division
Arkansas, Louisiana, New Mexico, Oklahoma, Texas
E-mail Mailbox: DallasSPD@ed.gov
Cynthia Thornton, Division Chief 214-661-9457
Jesus Moya – Dallas 214-661-9472
Kim Peeler – Dallas 214-661-9471

Kansas City School Participation and Third-Party Servicer Division
Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee
E-mail Mailbox: KansasCitySPD@ed.gov
FSAPC3rdpartyServiceroversight@ed.gov
Dvak Corwin, Division Chief 816-268-0420
Angie Beam – Kansas City 816-268-0534
Kathy Feith – Kansas City 816-268-0406

Chicago/Denver School Participation Division
Illinois, Minnesota, Ohio, Wisconsin, Indiana, Colorado, Michigan, Montana, North Dakota, South Dakota, Utah, Wyoming
E-mail Mailbox: Chicago.Denver.SPD@ed.gov
Jeremy Early, Division Chief 312-730-1529
Jason Charlton – Chicago 312-730-1695
Tammi Sawyer – Chicago 312-730-1531
Brenda Yette – Chicago 312-730-1522

San Francisco/Seattle School Participation Division
E-mail Mailbox: Sanfrancisco.Seattle.SPD@ed.gov
Martina Fernandez-Rosario, Division Chief 415-486-5605
Erik Fosker – San Francisco 415-486-5606
Kim Meadows – Washington, DC 202-377-3058