

2 The Master Promissory Note & eMPN

OVERVIEW OF THE MPN

To receive a Direct Loan, a borrower must complete and sign at least one Master Promissory Note (MPN) for that type of loan. The MPN is very important because it is the document that makes a borrower legally responsible for repaying his or her Direct Loan. The Department must have a valid MPN on file before it will credit your school for loan disbursements made under that MPN.

There are two types of MPNs for Direct Loans, one for student borrowers receiving Direct Subsidized and Unsubsidized loans, and the other for parent borrowers or graduate/professional students who are receiving a Direct PLUS loan.

The MPN collects identifying information for the borrower and the school, such as the borrower's name, SSN, date of birth, address and references. It does not include specific details concerning the loans that are to be made under that MPN, such as loan amounts, loan periods, or disbursement dates and amounts. Your school submits this type of loan information to the COD System in the Common Record or via the COD Web site (see Chapter 3).

Because the MPN does not include specific loan information, multiple loans can be made under a single MPN, and adjustments to the loan or disbursement amounts usually do not require a student (or parent) to sign a new MPN. However, your school must notify the student of the proposed loan amounts, and give an opportunity to refuse the loan or request a lower loan amount. We will discuss this further in the section on the confirmation process later in this chapter.

The MPN also contains information on the terms and conditions of the loan(s) that will be covered by the MPN, such as cancellation provisions, interest, fees, late charges, and repayment information and default provisions. The student or parent must receive a copy of the Borrower's Rights and Responsibilities Statement at the same time as the MPN. This Statement provides additional detail about interest rates, repayment terms, deferment, forbearance, and cancellation provisions, and late charges.

Topics

Overview of the MPN

- **Master Promissory Note**—William D. Ford Federal Direct Loan Program. For student borrowers receiving Direct Subsidized and Unsubsidized loans.
- **Application and Master Promissory Note**—Federal Direct PLUS Loan. For parent borrowers or graduate/professional students receiving a Direct PLUS loan.

Using the MPN for multiple loans

- Choosing not to use the multi-year feature

Confirmation for subsequent loans

- Active vs. Passive confirmation

Electronic MPNs

Using Paper MPNs

- MPN printing options
- Review & processing of MPNs
- Rejected MPNs

MPN Linking & MPN Responses

Booking a loan

COD must receive a completed and signed MPN (from the borrower or the school) before it can book a Direct Loan. Before the MPN can be booked, the school needs to send COD:

- an award record and an actual disbursement (DRI=True)

(See Chapter 3 for more on the DRI and the award record.)



Borrowers who are Minors

If a borrower of a Direct Subsidized or Unsubsidized Loan is a minor (less than 18 years old), he or she may sign an MPN without an endorser or other security. The borrower is legally obligated to repay the loan without regard to any state law that deals with minors taking on debt.

Expiration of the MPN

An MPN will expire if no disbursement is made within 12 months (1 year) after the date that the COD System receives the MPN.

If a portion of a loan is made on or before the 10-year limit, remaining disbursements of that loan can be made.

USING THE MPN FOR MULTIPLE LOANS

All participating schools are now eligible to use the MPN to make multiple loans to a student or to a parent borrower. In general, an MPN expires ten years after the date that the COD system receives the signed MPN, provided that at least one actual disbursement is made within 12 months of the COD receipt date.

A new MPN will have to be executed if:

- The student transfers from an FFEL school to your school, and there's no valid Direct Loan MPN on file with the COD System.
- All MPNs on file are expired or closed by the borrower.
- In the case of a PLUS loan, the most recent PLUS MPN was completed with an endorser addendum (see "adverse credit history" in Chapter 3).

If a student has transferred to your school from another Direct Loan school, you can check the student's ISIR or the COD Web site to see if they have a valid MPN on file. (Only "booked loans" are shown on ISIR; a student must have at least one booked loan for the student's ISIR to show a valid Direct Loan MPN in the COD System.)

Choosing not to use the multi-year feature

Either the school or the borrower may choose not to use the multi-year feature of the MPN.

Your school can decide to opt out of the multi-year feature for all of its students, or it can choose to limit the use of the multi-year feature to certain categories of borrowers. For example, you could restrict the use of the multi-year feature to student borrowers, but require parent borrowers to sign a new MPN each academic year.

MPN Identification Number

An identification number identifies each MPN. The MPN ID is a 21-digit number that is similar to the Loan/Award ID; however, the 10th position uses an MPN indicator rather than a loan type indicator.

123456789	M	09	G99999	001
Student's SSN	Type of MPN M = Sub/Unsub N = PLUS	Year Indicator	Direct Loan School Code (Begins with G or E)	Sequence Number

The MPN ID does not change for subsequent loans associated with the MPN, even though each loan will have its own unique loan/award ID.

If your school decides that it doesn't want to use the multi-year feature for any of its students, it must submit its request to the COD School Relations Center. Once the change is processed, the COD System will process Direct Loans as if a new MPN is required for each academic year. If, at a future time, the school decides to use the multi-year feature of the MPN, it must send another request to the COD School Relations Center.

A borrower can also decline to use the multi-year feature of the MPN, and choose to sign a new MPN each academic year. A borrower who doesn't want to receive more than one loan under the same MPN must contact the school's financial aid office or the Direct Loan Servicing Center (DLSC) in writing. In cases where a loan has already been made under the existing MPN, no further loans may be made after the date that the COD System or the school receives the borrower's written request.

Documenting confirmation policies

Your school must document its confirmation procedures, and retain a description of the process(es) in effect for each academic year in which it makes second or subsequent loans under MPNs. The documentation of the process may be kept in paper or electronic format and need not be kept in individual borrower files.

The documentation must be kept indefinitely, because it must be submitted to ED, upon request, if a borrower challenges the enforceability of a loan. We recommend that schools include a description of the confirmation process in their student consumer information just as they do for other school policies, such as refunds and academic progress.

PLUS loan confirmation

To originate a PLUS loan for a parent borrower, you may need to collect additional information that is not available from the processing system (see

Chapter 3). Some schools collect this information on a “Loan Request Form” that includes a requested loan amount. This request can serve as confirmation for a parent PLUS loan.

More information on confirmation processes

DCL GEN 98-25 provides examples of different methods of confirmation. The most effective processes will likely vary among schools. Participants are encouraged to use and test various technologies in this process. Some technologies suggested include the Internet, email, card technologies and voice response.

CONFIRMATION FOR SUBSEQUENT LOANS

Your school must have a confirmation process to ensure that the borrower wants subsequent loans that are awarded under an MPN. You may use either an active or passive confirmation process for Direct Subsidized and Unsubsidized Loans.

- *Active confirmation* — the school does not disburse the loan until the borrower either affirmatively requests or accepts the proposed loan type and amount or requests changes to the proposed loan package.
- *Passive confirmation* — the school does not disburse the loan until the borrower is notified of the proposed loan package and the time given to the borrower to respond has elapsed. The borrower only needs to take action if he or she wants to decline the loan or make adjustments to the type or amount of the loan.

Your school *must* use an active confirmation process for PLUS loans made under a multi-year MPN.

The confirmation process may be part of the required notices and disclosures that already exist, or it may be a separate process that supplements those notices and disclosures. For example, your school’s award letter may be used as part of either an active or passive confirmation process. For active confirmation, the borrower would be asked to confirm the loan amount offered by responding to your school’s offer. For passive confirmation, the borrower would be asked to respond only if he or she wanted to cancel or reduce the loan amount offered.

In the case of PLUS loans, if your school is using a separate PLUS loan request form that includes a requested loan amount, the submission of the form can serve as “active confirmation” that the borrower wants to take out that loan amount.

Confirmation can take place when students apply for aid, when aid is packaged, when loan funds are disbursed or at some other appropriate time. The confirmation process could cover the entire loan for the academic year or loan period or, instead, could require that the student confirm each loan disbursement.

Generally, schools should use the same confirmation process for all borrowers. However, in some cases, a school may want to establish more than one confirmation process to accommodate existing administrative procedures, or because the school believes that it can best inform borrowers of their loan obligations if it uses different confirmation processes for different groups of students. For example, a school could have a policy that requires active confirmation for undergraduate students and passive confirmation for graduate students.

ELECTRONIC MPNS

Student and parent borrowers can now complete and sign an electronic MPN (eMPN) on the Web. Most schools have found the electronic MPN to be a convenient and reliable way to process Direct Loans, and encourage their students to file electronically.

If you want students and parents to be able to use the eMPN for Direct Loans at your school, you must sign up for a User ID and password and then set up a profile on the Web site. To do this, you must submit a request to the COD School Relations Center. A list of required data is available on the eMPN site (dlenote.ed.gov) under “Info for Schools” tab.

Once you have a User ID and password, you must set up your profile and options on the eMPN site:

- *Electronic MPN Participation.* Select “Y” to enable students and parents to choose your school from the dropdown menu in Step 3 of the eMPN process.
- *Timing of Origination Records.* You can specify whether you want borrowers to be able to file an eMPN before you’ve submitted an award record. If you select “N”, borrowers at your school can complete an electronic MPN at any time. However, you may prefer that the MPN not be completed until the borrower is actually enrolled in the school or has accepted a financial aid package. If you select “Y”, borrowers will not be able to select your school’s name from the dropdown menu in Step 3 of the eMPN process until COD has received a loan award record for that student or parent.

Please keep in mind that a borrower may still be able to complete an eMPN if he or she uses the name of another school that accepts eMPNs at any time. In this case, there will already be an MPN on file when your school submits loan award information for the borrower to COD System.

- *School Specific Message.* You can also include a message to borrowers completing an MPN for your school. This can be used to provide specific instructions, deadlines, or next steps that the borrower must complete.

eMPN Web site

The address for the eMPN Web site is:
dlenote.ed.gov

The entry page is the same for students and schools. To login to use the school features, select the link at the bottom of the left-hand sidebar.

Choosing the right MPN for Grad/Professional PLUS

Graduate/professional students who are completing the e-MPN for a Direct PLUS loan, should select the link for “Student Loans” not “Parent PLUS Loans.”

Graduate/professional students who are filing the paper MPN use the same MPN as parents, but report their own information instead of the parental information that is requested.

Opting out of the eMPN

▶ While the Department recommends the use of the eMPN whenever possible, your school can change the option to not accept electronic MPNs at any time.

▶ If a borrower wants to file a paper MPN, the school must honor this request.

eMPN from another school

If the student has filed an eMPN using another school, you may still use the MPN to make loans at your school. The MPN does not have to be updated.

The eMPN site: dlenote.ed.gov

Direct Loans MASTER PROMISSORY NOTE

WILLIAM D. FORD FEDERAL DIRECT LOAN PROGRAM

FAQS SITE ASSISTANCE CONTACT US PRIVACY POLICY ADDITIONAL RESOURCES



Advantages of the Electronic MPN

The eMPN can greatly speed up the loan process by enabling the student to electronically sign and submit the MPN on-line. There is no time lost while the MPN is in the mail, and processing is almost instantaneous.

Another advantage is the structure of the eMPN, which presents information to students in 11 steps, encouraging the student to more closely examine the loan document. To reinforce the importance of understanding the terms and conditions of the loan, the eMPN asks the student to affirmatively respond after reading the Borrower's Rights and Responsibilities Statement and the MPN Addendum (if applicable).

The eMPN also greatly simplifies the loan process for your school, because it automatically delivers the loan document to the COD System, where the official record is maintained for loan servicing purposes. You don't have to prepare manifests, or deal with possible batch discrepancies when submitting multiple MPNs to COD by mail.

Step 3 of eMPN: Borrower selects school

In Step 3, the borrower chooses the school that is making the loan from a pull-down menu. If a student has filed a Direct Loan eMPN listing another school, you may still use it as the basis for loans at your school, provided that it has not expired.

STEP 1 > STEP 2 > **STEP 3** > STEP 4 > STEP 5 > STEP 6 > STEP 7 > STEP 8 > STEP 9 > STEP 10 > STE

PROVIDE NAME AND SCHOOL (CONTINUED)

You are not done yet...there are nine steps left to complete.

Please select your school from the list.

Borrower Information (continued)	
First Name:	HORATIO
Middle Initial:	
Last Name:	GATES
SSN:	123-45-6789
DOB:	09/24/1712
School Location:	WEST VIRGINIA
School:	STEAMBOAT UNIVERSITY RUMSEY, WV 34908-7358
<input type="button" value="Continue"/> <input type="button" value="Cancel"/>	

Step 7 of eMPN: Borrower reviews information

This review of the borrower's information is a good summary of the information that is collected on the MPN. Note that there is no loan-specific information, such as loan type, amount, or disbursement dates.

SECTION A: BORROWER INFORMATION		READ THE INSTRUCTIONS BEFORE COMPLETING THIS SECTION	
1. Driver's License State and No. VA A11111-22-111	2. Social Security No. 091-21-8120		
3. E-mail address (optional) GOCANDO@CANDOC1828.NET			
4. Name and Address MERCER, CHARLES FENTON 1100 UTTERBACK STORE ROAD ALDIE, VA 22032	5. Date of Birth 09/12/1812	6. Area Code/Telephone No. (717) 111-9999	
7. References: You must list two persons with different U.S. addresses who have known you for at least three years. The first reference should be a parent or legal guardian.			
Name	1. THOMAS L PYNCHON	2. GIBERT O ARENAS	
Permanent Street Address	245 WORCESTER LANE	2134 GEORGETOWN PIKE	
City, State, Zip Code	PROVIDENCE, RI 02914	GREAT FALLS, VA 22066	
Area Code/Telephone No.	(717) 111-9999	(717) 111-9999	
Relationship to Borrower	GUARDIAN	IDOL	
SECTION B: SCHOOL INFORMATION			
8. School Name and Address CANAL ENGINEERING INSTITUTE 1460 UNIVERSITY DRIVE ALDIE, VA 22032-5195	9. School Code/Branch G00001	10. Identification No. To Be Completed	

**MPN approval**

If your school chooses to program its own software to print MPN forms, the Department must review and approve a sample MPN generated by the software before a school can use it. The MPN that a school sends to the Department for approval must be an original and must include sample data. Note that you may add a bar code (used by some schools for internal tracking purposes) without pre-approval by ED. However, the bar code cannot be placed in the bottom margin of the note, which is reserved for the Department's use.

Schools requesting approval for MPNs printed by institutionally or privately developed software must send an original (not photocopied or faxed copy) with sample data to:

U.S. Department of Education
ATTN: MPN Testing
P.O. Box 5691
Montgomery, AL 36103

Ordering MPNs from the Department

If you send your borrowers blank MPNs or choose to print borrower data on the MPN, you must use the approved MPN. These can be ordered at FSA Pubs (www.fsapubs.org) at no charge

MPN with data labels

MPN without data labels

USING PAPER MPNS

As the eMPN process has become more popular, many schools only use the paper MPN on a contingency basis. That is, the school encourages its borrowers to file electronically, and only prints the paper MPN for those students who have trouble filing on the Web. Schools may also need to process a paper MPN if a borrower specifically requests to sign a paper MPN. In other cases, a school may prefer to process paper MPNs, in particular if the school provides the MPN as part of in-person loan counseling.

In the case of the paper MPN, you have the choice of printing MPNs at your school, or having the COD system print the MPNs and mail them to your students. (It is also possible to have the COD system print the MPNs and send them to your office.)

MPN Printing Options

Schools have several options if they choose to print MPNs for their borrowers.

- *School sends a blank MPN form to the borrower.* The borrower fills out all sections of the MPN. (Order "MPN with data labels" from FSAPubs.org)
- *School sends an MPN with pre-printed borrower data to the borrower.* The school's software prints many of the section headings and related borrower data (such as "Name") on the form. Note: EDEExpress schools usually fall into this category. (Order "MPN without data labels" from FSAPubs.org)
- *School uses its own software to print a complete MPN with pre-printed borrower data and sends it to the borrower.* The school's software must follow the specifications in the COD Technical Reference, and it must print the instructions and legal information. A school may not change the format or wording of the MPN. The software must print the entire MPN to be identical in format and wording to the approved MPN form. (See sidebar for exceptions.)

You can also choose to have the COD system print MPNs at the school level or at an individual record level. Schools that want COD to print all MPNs should select this on the COD Web site. In addition, the student's origination record (discussed in the next chapter) includes a field showing the "Promissory Note Print Code." The following initial choices may be selected when you are sending in an award record:

- O = School or its delegate prints and sends
- S = COD Prints and sends to Borrower
- R = COD Prints and sends to School

This code can be sent to override the school-level option. For example, if your school-level option is for COD to print MPNs, but you decide to help an individual student fill out the MPN on-the-spot, you can override the option by submitting an ‘O’ in the student’s award record. In this case, COD will not print the MPN.

Sending the MPN to the borrower

When COD is selected to print the MPN, it will mail the MPN to the borrower. COD can also send the printed MPN to the school, if the school specifies this on the individual award record (code “R”).

If your school will be sending the MPN to the borrower, it is helpful to include a cover note explaining how soon the MPN must be returned, and reminding the borrower not to alter the MPN, to write legibly in blue or black ink, and to return the MPN with an original signature (see “MPN acceptance guidelines,” below). Please do not cover any of the text or information fields with a date stamp or school stamp, and do not use “highlighters” to indicate fields that need to be filled out, as this may interfere with the scanning of the MPN.

After the borrower signs the MPN, the borrower can return the MPN to the school or mail it directly to the MPN processor. If you intend for the borrower to mail the MPN directly to the processor, you should explain this clearly in the cover note when you send the MPN to the student.

Reviewing paper MPNs prior to submission to ED

If you expect the borrower to return the MPN to your office for submission to the Department, the cover note should specify the time-frame for the borrower to return the signed note. Your office should have a thorough review procedure to be sure that the MPNs are properly completed and signed, to avoid processing delays.



When COD doesn’t print an MPN

If you have requested that the COD System print MPNs for your school, then the COD System will print an MPN when it receives an award record from your school unless:

- ▶ the school is using the multi-year feature of the MPN, and
- ▶ the MPN on file at COD system has not expired, and
- ▶ the borrower has not closed all existing MPNs.

MPN acceptance guidelines

The following tips will help ensure that the Department accepts MPNs from your borrowers.

- Make sure that the MPN was completed in blue or black ink.
- Make sure the MPN has an original signature. (Signatures cannot be faxed, stamped, photocopied, or signed in pencil.)
- Make sure that the borrower has not altered the signature or the text of the MPN.
- Make sure that hand-written data on the MPN is legible.
- Make sure that all pre-printed legal text and borrower-entered information is readable and is not obstructed by a school stamp or date stamp. Please do not use “highlighters” to indicate fields on the MPN, as the highlighter color makes the document difficult to scan.
- Make sure that the legal text is printed on the reverse or subsequent pages of the MPN if using the downloadable version of an MPN.

The full text of the acceptance guidelines (Direct Loan Bulletin) for paper MPNs is presented in the Appendix.

Format for loan manifest

The manifest must be in a specific format.

The DL module of EDEExpress has a feature that enables you to print out an acceptable manifest.

If you are using institutionally or privately developed software, you must be sure that the manifests follow ED specifications, which are published in the Volume VI, Section 7 of the COD Technical Reference.

MPN processing center addresses

▶ Overnight, Express or Certified Mail

Department of Education
201 TechnaCenter Drive
Montgomery, AL 36117*

▶ Regular Mail:

Department of Education
P.O. Box 5692
Montgomery, AL 36103*

*Note that regular mail goes to a different zip code than overnight, express, or certified mail.

ED recommends that schools send MPN batches to the Department by certified mail (return receipt requested) or by express mail service. This provides schools with a way to track down batches if they're lost in the mail.

Submitting Paper MPNs to the MPN processor

After checking to make sure that the MPN has been correctly completed and is signed, forward it to the MPN processing center. Your school is not required to keep copies of MPNs. However, you may want to keep copies on hand until they are accepted. Schools do not have responsibility for MPNs after they are accepted in the COD system.

With each shipment (batch) of MPNs, you must include a hard-copy (paper) manifest that lists the borrowers' names and MPN ID numbers for each MPN in the batch. The manifest also has a certification statement to be signed by the appropriate school official attesting to what is being submitted.

MPNs for Direct Subsidized and Unsubsidized Loans must be batched separately from the MPNs for Direct PLUS Loans, with a separate MPN manifest for each batch. MPNs should be batched in groups, but in no more than 100.

Separate MPN batches and manifests are also required for each Direct Loan school code at a school. For example, one school may have different school codes for branch campuses or programs, such as law and medicine.

How the processor reviews & processes paper MPNs

The MPN processor will review all paper MPNs to ensure they are properly completed and signed so that they are legally binding documents that require borrowers to repay their Direct Loans.

When the ED processor receives a batch submission of MPNs from a school, it compares the MPNs in the batch with the listing on the manifest, and then signs the manifest and returns it to the school. If there are discrepancies, the ED representative will note them on the manifest.

For example, an MPN that is in the batch might not be listed on the manifest, in which case the MPN is rejected and returned to the school with the manifest.

The processor also reviews each individual MPN that it receives, and accepts or rejects it. If accepted, the MPN will be imaged and the MPN data will be sent to the COD system. COD will send MPN acknowledgments to schools for any MPN that it accepts.

Rejected MPNs

If the MPN has missing items or contains certain mistakes, the processor will return it for correction to the school or borrower, depending on who sent the MPN.

If the processor returns an MPN to your school, the shipping manifest is annotated to reflect the reason it was returned (for example, no signature.)

When an MPN is returned to your school, you should work with the borrower to correct the problem(s). If the ED processor returns an MPN to a borrower, it will work directly with the borrower to be sure that he or she corrects the problem(s) and sends the MPN back.

Corrections can often be made directly on the MPN that has been returned by the processor, although a borrower may have to initial the changes. The borrower may cross out any error that he/she has made when filling out the MPN, correct it, and initial the correction; and return the properly completed and signed MPN to the organization that sent it (school or the processor).

However, there are circumstances when the school has to reprint the MPN for the borrower to complete and sign again. MPNs must be reprinted if:

- the signed date on the promissory note is after the form's Office of Management and Budget (OMB) expiration date,
- the promissory note is marked 'copy' or 'nonnegotiable,'
- the citizenship of the borrower is marked as an ineligible non-citizen, or
- the text of the promissory note or the signature on it is altered.



Quality control in MPN processing

The processing center uses a double data entry and verification process to minimize data entry errors. The double data entry process allows us to validate the data from the MPN twice before the data is released for linking to an award. As a result, we have reduced the miskey error rate to .08% of all MPNs keyed.

Reviewing MPNs from Borrowers

The Department performs the same review for MPNs that it receives directly from borrowers. The Department reviews the MPNs for completeness and signatures. If there is a problem with an MPN, the Department works directly with the borrower to correct the problem.

MPN information on DL Web Site

See the Direct Loan Web site (Professionals area) for the latest information on which MPNs and loan documents to order:

use: www.ed.gov/FSA/DirectLoan/professional.html

MPN LINKING & MPN RESPONSES

Checking award records for “Pending” MPNs

If the MPN Response or COD Web site lists the MPN as pending, but you believe that the award record was already submitted for that borrower, you may want to find out what happened to the award record. For example:

- ▶ Did your office send the award record to the COD system?
- ▶ Did the COD system reject the award record?
- ▶ Was a rejected award record corrected and sent as a change record to the COD system?

Once the COD system receives and accepts the MPN data, it will remain on file to be linked to an award record. If COD cannot locate an award record for the borrower, it will hold the MPN in a pending status. COD will keep the MPN on file as “pending” until it receives and accepts a corresponding award record. If the borrower has filed more than one MPN, COD will link the loan to the ‘pending’ MPN that arrived most recently.

MPN Responses

The COD system sends MPN responses to schools for all accepted and pending promissory notes, whether schools or borrowers send them to the Department.

- Accepted MPNs—the responses will have an indicator of “A.” No action needed.
- Pending MPNs—the response will have an indicator of “X,” if COD has not received an award for the student. No action is required, though you should check if you believe that you have already sent an award record.

A new MPN response will be sent every time the status of an MPN changes (for example, when an MPN changes from “Pending” to “Accepted”). COD also sends an MPN response to schools when the expiration date changes. This response may be sent to more than one school, if the MPN was created at one school (or the student chose the school during the eMPN process), but the student ended up receiving a loan at another school. In this case, the school whose loan linked to the MPN will also be sent a response about the MPN status and expiration date.

COD does not send MPN responses for MPNs that are rejected and returned for correction.

Data elements used to link loans

For Direct Subsidized and Unsubsidized loans, the COD system will link a valid MPN using the student’s Current SSN, Date of Birth, and first two characters of the first name

For Direct PLUS Loans, the COD System will link a valid MPN using all of the following data elements:

- Current borrower SSN
- Borrower Date of Birth
- First two characters of the borrower’s first name
- Accepted credit decision (An accepted credit decision must be on file for the PLUS award or it will not link, even if there is a valid MPN on file. More detail about the credit decision process is found in Chapter 3.)
- Current student SSN
- Student Date of Birth
- First two characters of the student’s first name

For graduate/professional students receiving a PLUS loan, the student and borrower information should be the same.