

Origination Process Overview

Direct Loan Origination is the process through which your school will determine a student's or parent's eligibility for a William D. Ford Federal Direct Loan (Direct Loan) Program loan and inform the U.S. Department of Education's (the Department's) Common Origination and Disbursement (COD) System of eligibility and loan information.

Through the Direct Loan origination process, your school must complete the following actions:

- Confirm all student or parent eligibility factors
- Evaluate need and determine Direct Loan amount
- Notify student or parent of expected Direct Loan as required, and *Master Promissory Note* (MPN), entrance counseling, and Annual Student Loan Acknowledgement (starting with the 2021–22 Award Year) completion
- Confirm completion/existence of valid Direct Loan MPN and ensure completion of Annual Student Loan Acknowledgement (starting with the 2021–22 Award Year), entrance counseling, and/or PLUS Counseling, if required
- Complete and submit loan origination information to the COD System
- Complete and submit updated loan origination information to the COD System, if necessary

In this document, we provide a high-level overview of the Direct Loan origination process. It is one in a series of high-level overviews developed for the Foreign School Direct Loan Processing area of the [Foreign School Information page](#).

The origination process information is presented in the following order:

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Section 1 – Direct Loan Types

The Direct Loan Program offers the following loan types:

- Direct Subsidized Loans - These loans are made to undergraduate students.
- Direct Unsubsidized Loans - These loans are made to undergraduate and graduate/professional students.
- Direct PLUS Loans - These loans are made to eligible graduate/professional students and to eligible parents of dependent undergraduate students.

Section 2 – Student and Parent Eligibility

In terms of borrower eligibility for Direct Loans, the school will need to confirm student and parent eligibility before originating a Direct Loan.

Confirmation of student and parent eligibility includes the following:

- Student's completion of the Free Application for Federal Student Aid (FAFSA®) form through retrieval and review of Institutional Student Information Record (ISIR)
- For Direct PLUS Loans, graduate/professional student's or parent's consent to conduct credit check and provision of other necessary information through completion of Direct PLUS Request via StudentAid.gov website or other school process
- Basic student and parent eligibility requirements
- Student's acceptance in an eligible program on at least a half-time basis
- Student's compliance with school's financial aid Satisfactory Academic Progress (SAP) policy
- Student's remaining loan eligibility under annual and aggregate loan limits and under the 150% Subsidized Loan Limitation, as appropriate

In addition to the above student and parent eligibility checks, the following requirements apply:

Direct Loan MPN Completion – A student or parent must complete a Direct Loan *Master Promissory Note* (MPN) for **each** academic year that he or she receives a Direct Loan for attendance at your school. This applies even if the student or parent has previously signed an MPN to receive Direct Loan Program loans at other schools.

There are two types of MPNs – one for students who will receive Direct Subsidized Loans and/or Direct Unsubsidized Loans and the other for graduate/professional students and parents who will receive Direct PLUS Loans. The MPN is the legal document through which the student or parent promises to repay his or her Direct Loan and any accrued interest and fees to the Department. It also explains the terms and conditions of the loan.

Once your school has enrolled to participate in the Direct Loan Program, students and parents may complete a Direct Loan MPN electronically via the StudentAid.gov website.

Notes:

1. To complete a Direct Loan MPN electronically, the student or parent must have an FSA ID. If the student or parent does not already have an FSA ID, he or she may create one on the StudentAid.gov website. **Note:** FSA IDs must be unique to each person. A student and parent should not share an FSA ID.

2. While we strongly encourage electronic completion of the MPN, a student or parent also has the option to complete a paper Direct Loan MPN. To do so, the student or parent must call our Student Loan Support Center staff at 1-800-557-7394 and then return the completed paper MPN to us at the address that will be provided.

Entrance Counseling Completion – In some cases, a student may need to complete Entrance Counseling.

- An undergraduate or graduate/professional student who has not previously received a Direct Loan or FFEL loan must complete Entrance Counseling before he or she can receive a Direct Loan.
- A graduate/professional student who has not previously received a PLUS loan as a graduate/professional student through the Direct Loan or FFEL programs must complete Direct Loan Entrance Counseling before he or she can receive a Direct PLUS Loan. **Note:** Parent borrowers do not need to complete entrance counseling.

Your school has options for meeting the regulatory requirement to ensure that entrance counseling is provided. Once your school has enrolled to participate in the Direct Loan Program, one of your options is to have the student complete Entrance Counseling electronically via the StudentAid.gov website. An FSA ID is required to complete online Entrance Counseling.

Your school may choose to have its borrowers complete Entrance Counseling by other means, such as through in-person sessions, audio-visual presentations, or other online counseling products. As a reminder, if your school uses one of these other options for Entrance Counseling, it is responsible for ensuring that the counseling meets all federal Entrance Counseling requirements.

Note: While not associated with the front end of the Direct Loan process, your school is also responsible for ensuring that exit counseling is conducted in accordance with regulatory requirements. One option is to have students complete exit counseling via an online tool for federal student loan borrowers. The tool is available via the StudentAid.gov website and provides a single exit counseling session. Other options include in-person exit counseling and other online tools. As a reminder, if your school uses one of these other options for exit counseling, it is responsible for ensuring that the counseling meets all federal exit counseling requirements.

Annual Student Loan Acknowledgement Completion – All borrowers (both students and parents) will complete the Annual Student Loan Acknowledgement on the StudentAid.gov website. For a Direct PLUS Loan made to a parent borrower, **only the parent** completes the Annual Student Loan Acknowledgement. To complete the Annual Student Loan Acknowledgement, borrowers must have a username and password (FSA ID).

Note: While the Annual Student Loan Acknowledgement is currently available on the StudentAid.gov website, borrowers are not required to complete the Annual Student Loan Acknowledgement process until they begin receiving loans for the 2021–22 Award Year.

Direct PLUS Loan Request and Credit Check Completion – A primary eligibility requirement for a graduate/professional student or a parent who wishes to obtain a Direct PLUS Loan is that he or she must not have an adverse credit history, as defined in regulations. If the graduate/professional student or the parent has an adverse credit history, he or she may still be eligible for the loan:

1. by obtaining an endorser who does not have an adverse credit history and agrees to repay the loan if the borrower does not and completing PLUS Counseling via the StudentAid.gov website or
2. by documenting extenuating circumstances that meet the Department's requirements and completing PLUS Counseling via the StudentAid.gov website.

The Department conducts a credit check once it receives confirmation that a graduate/professional student or parent has consented to the Department checking his or her credit. There are three options through which the credit check can be initiated:

3. the graduate/professional student or parent completes a Federal Direct PLUS Request for Supplemental Information (Direct PLUS Request) electronically via the StudentAid.gov website,
4. to allow the Direct PLUS Loan origination submission to trigger the credit check, or
5. to request the credit check manually via the [COD website](#).

The advantages of the Direct PLUS Request process are that it is initiated by the graduate/professional student or parent and allows for the collection of the authorization to conduct the credit check, as well as other necessary information, in one streamlined, up-front process. As a reminder, if a borrower does not complete the Direct PLUS Request or has not completed the Direct PLUS Loan MPN, the school must get written authorization from the borrower prior to completing a credit check.

Regardless of the web, software, or system product your school uses (see Section 4); it will receive electronic notification when any StudentAid.gov process identified above (MPN, entrance counseling, exit counseling, PLUS Counseling, Direct PLUS Loan Request, Annual Student Loan Acknowledgement, or credit check) has been completed. This notice will be sent to your school's Student Aid Internet Gateway (SAIG) mailbox. In addition, your school will be able to view the completion information via the COD website.

Section 3 – Direct Loan Determination and Notification

Once your school has confirmed student and parent, if applicable, eligibility, it will determine the Direct Loans for which the student and parent, if applicable, is eligible. This determination will include the loan type (Direct Subsidized Loan, Direct Unsubsidized Loan, and/or Direct PLUS Loan) and amount. As explained in Section 4, your school may use web, software, or system products to assist with these determinations.

After your school determines loan types and amounts, it must notify a student of the Direct Loan awards for which he or she is eligible and inform the student of MPN and entrance counseling requirements, as applicable. This notification is commonly referred to as a “financial aid offer” and may include information about the Direct PLUS Loan for which the student’s parent may be eligible.

Note: In addition to notifying a student or parent of the need to complete a Direct Loan MPN and/or Entrance Counseling, as applicable, your school must also ensure that the student or parent has actually completed the MPN and/or entrance counseling. As previously explained, your school will receive electronic notification in its SAIG mailbox when a student or parent completes an MPN or any counseling via the StudentAid.gov website. In addition, your school will be able to view completion information via the COD website.

Section 4 – Originating Direct Loans: Options for Communicating with the COD System

After your school has confirmed student or parent eligibility and determined the Direct Loans for which the student or parent is eligible, it will electronically communicate the loan origination information to the Department via the COD System. Think of this as informing us of who will receive Direct Loan funds, for what period, in what amounts, and on what anticipated dates. Depending on the number of loans your school will process, you will use one of several software product options that are available to assist schools in originating Direct Loans and communicating with the COD System.

The software product options are as follows:

- **Direct Loan Origination Tool** – We provide this web-based functionality at no charge to schools. This is a tool located within the COD System that is accessed by authorized users via the [COD website](#) to originate and disburse Direct Loans. The tool is designed to assist schools that have 2,500 or fewer students for whom they will originate loans.
- **EDExpress for Windows Software** – We provide this software at no charge to schools. This software is used to originate and disburse Direct Loans and communicate with the COD System. This software product and its technical documentation are available on [the Information for Financial Aid Professionals \(IFAP\) website](#).
- **Commercial Vendor Software** – Higher education software providers develop software products and systems that meet our requirements for originating and disbursing Direct Loans and communicating with the COD System. There is a cost associated with vendor software and systems.
- **School-Developed System** – School IT departments develop and maintain systems that meet our requirements for originating and disbursing Direct Loans and communicating with the COD System.
- **Third-Party Servicer** – This is an “agent” of the school who is hired by the school to perform some or all of the tasks associated with originating and disbursing Direct Loans and communicating with the COD System.

Section 5 – Originating Direct Loans: Using the Direct Loan Origination Tool Option

If your school opts to use the Direct Loan Origination Tool, authorized users at your school will prepare and submit origination information for one or multiple students in batch format via the web. The tool is designed to walk the user through the batch submission process. It includes Wizard and Hints features that can be used until the user is familiar with the process.

Note: To be able to use the Direct Loan Origination Tool, your school will first need to request COD System and website access for personnel at your school who will process Direct Loans. To request COD System and website access, you must complete a [paper Student Aid Internet Gateway enrollment application](#). For information regarding SAIG enrollment, refer to the [SAIG Overview and Contact Information document](#) posted on the [Foreign Schools Information page](#).

The Direct Loan Origination Tool offers a Direct Loan Wizard Toolbox that includes the following features to assist your school with the origination process:

<i>Through Direct Loan Wizard Toolbox feature...</i>	<i>Your school will be able to...</i>
Student Management	<ul style="list-style-type: none"> • Access a list of up to 2,500 students who have selected your school on the FAFSA. Remove students who have not enrolled at your school and add them back at a later time, if necessary.
COA Profile Management	<ul style="list-style-type: none"> • Store up to 200 profiles for groups of students with like educational expenses. • Create, delete, update, and view profiles based on costs associated with specific programs at certain grade levels. • Access and use the Cost of Attendance (COA) calculator.
Award Profile Management	<ul style="list-style-type: none"> • Store up to 100 profiles for groups of students with like loan period, academic year, and disbursement schedule information. • Create, delete, update, and view profiles based on specific award information.
Batch Management	<ul style="list-style-type: none"> • View, correct, and update draft batches. • View summary information and obtain Document ID for submitted batches. • Link to batch search page through which submitted batches can be researched.
Links & Resources	<ul style="list-style-type: none"> • Link to the COA calculator, documentation checklist, and other Websites and online resources.
DL Tool School Settings Note: This is not the same as the Direct Loan Tool software available to schools from the IFAP website.	<ul style="list-style-type: none"> • Establish loan period, academic year, disbursement, and other key information that will automatically populate the Award Profile. • Indicate whether or not Direct PLUS Loans are automatically created during the origination process.

After initially setting up some basic information about how your school originates and disburses loans under DL Tool School Settings, COA Profile Management, and Award Profile Management, your school's authorized user will click on Start Here and follow these steps to originate loans:

<i>In Direct Loan Origination Tool step...</i>	<i>Your school will be able to...</i>
1 – Select Students	<ul style="list-style-type: none"> • Select students whose Direct Loans will be included in the batch submission.
2 – Assign COA Profile	<ul style="list-style-type: none"> • Apply an established COA Profile that includes the educational expenses for the program and grade level to one or multiple students. • Modify calculated need on an individual basis.
3 – Assign Award	<ul style="list-style-type: none"> • If a COA Profile has been applied, see award type and amount information automatically populated. • Modify calculated loan amounts on an individual basis. • Apply an established Award Profile that includes information such as loan period and number of disbursements to one or multiple students. <p>Note: If an Award Profile or a COA Profile has not been applied, enter missing information on an individual basis.</p>
4 – Review & Submit	<ul style="list-style-type: none"> • Check all student, award, and disbursement information included in the batch submission. • Verify that financial aid SAP requirements have been met. • Submit the batch via the web.

We anticipate that most foreign schools will use the Direct Loan Origination Tool and the COD website to process Direct Loans. In this case, your school's authorized COD website users will submit and check all origination and disbursement information via the COD website. However, for each action that your school completes via the COD website, the COD System will generate a web response (also commonly referred to as an "Acknowledgement") and send it to your school's SAIG mailbox. It is important for your school to retrieve and save these responses in your school's records. Web responses will be in a format that can be easily opened in Notepad or a similar software product; they do not require coding to a record layout.

Section 6 – Originating Direct Loans: Using Other Software/System Options

If your school opts to use the EDEExpress for Windows software, commercial vendor software, or a school-developed system, it will use the COD Common Record to process Direct Loans. Using the COD Common Record Extensible Markup Language (XML) Schema, your school will submit Common Record Documents to the COD System in batches of one or more via the SAIG. Another way to think of this is that your school will enter information for individual loans in its school software or system, put those loan records together in a batch, and then send the batched records to the COD System.

In follow up to submitting a COD Common Record batch, your school will receive a COD Common Record Response after the COD System processes the batch. The responses will let your school know if the records were accepted or rejected, and, if rejected, the reason for the rejection.

Detailed technical guidance is available in the COD Technical Reference and the EDEExpress for Windows user documentation posted on [the IFAP website](#).

Note: If your school uses the EDEExpress for Windows software, commercial vendor software, or school-developed system approach to processing Direct Loans, it should prepare and submit origination information via the batch process. Doing so ensures that all records between your school's system and the COD System match. Refer to the EDEExpress for Windows user documentation or consult with your school's software provider/IT staff for guidance on updating records via the COD website.

Section 7 – Originating Direct Loans: Updating Origination Information

After your school originates Direct Loans for its students and parents, it may be necessary to update submitted origination information for some loans. When necessary, your school will do so via the COD website if it is a Direct Loan Origination Tool user or via COD Common Record batch processing if it is an EDEExpress for Windows, commercial vendor software, or a school-developed system user.

Note: If your school uses the EDEExpress for Windows software, commercial vendor software, or school-developed system approach to processing Direct Loans, it should prepare and submit origination updates via the batch process. Doing so ensures that all records between your school's system and the COD System match. Refer to the EDEExpress for Windows user documentation or consult with your school's software provider/IT staff for guidance on updating records via the COD website.