

## **Additional COD System Changes for the CARES Act Beginning Nov. 8, 2020 (Supplemental Phase) Attachment to November 2020 Electronic Announcement**

As part of the Common Origination and Disbursement (COD) System implementation planned for Nov. 8, 2020, we will make changes to the COD System to support the reporting requirements for withdrawn students who qualify for a Title IV waiver under the CARES Act. This document provides additional information about the November 2020 changes.

Previous guidance was issued in several other announcements, including [May 15, 2020](#), [July 30, 2020](#), and [Sept. 23, 2020](#).

### **COD System Changes**

The following changes will impact COD System processing for the Federal Pell Grant (Pell Grant), Iraq and Afghanistan Service Grant, Teacher Education Assistance for College and Higher Education (TEACH) Grant, and William D. Ford Federal Direct Loan (Direct Loan) programs.

#### **Change to Applicable Award Years for the Coronavirus Indicator (COD web and R2T4)**

In the previous announcements, we noted that the Coronavirus Indicator would be used for eligible disbursements for Direct Loan for the 2018–19 Award Year and forward, and TEACH Grant, or Pell Grant and Iraq and Afghanistan Service Grant awards for the 2019–20 Award Year and forward. Beginning Nov. 8, 2020, we will update the COD website, so that the Coronavirus Indicator will be available for eligible disbursements **for all programs for the 2017–18 Award Year and forward**.

**Note:** We will also update the Return of Title IV (R2T4) calculator on the COD website to add the R2T4 Coronavirus Indicator checkbox for the 2017–18 Award Year.

#### **Change to the Valid Date Range for Payment Period Start Date for the Coronavirus Indicator**

In the previous announcements, we noted that one of the requirements for the Coronavirus Indicator was that the disbursement's payment period start date must be within a specific date range. Previously, the valid date range for the payment period start date began with Jan. 1, 2020 and then was moved to July 1, 2019. Beginning Nov. 8, 2020, to accommodate schools with unique circumstances and terms with long payment periods, we will further expand the valid date range for the payment period start date, and the Coronavirus Indicator will be accepted when the payment period start date is a date from Jan. 1, 2018 to Dec. 31, 2020.

**Note:** While the valid date range for payment period start date has been expanded, all other requirements related to the Coronavirus Indicator must be met.

#### **Bypass of COD Reject Edit 71**

Typically, COD Reject Edit 71 (New Disbursement, Increase, or DRI = True Received Prior To Start of Processing Year Or After End Of Processing Year Without Extended Processing) triggers for all programs when a change is submitted to a disbursement after a school has completed the Balance Confirmation process, or if the program and award year has passed the data submission (closeout) deadline. For the Pell Grant and Iraq and Afghanistan Service Grant Programs only, edit bypass logic allows schools to submit **downward** disbursement adjustments or changes to disbursements flagged

for Potential Overaward Process (POP) without requesting Reopen/Extended Processing in the COD System.

Beginning Nov. 8, 2020, we will expand COD Reject Edit 71 bypass logic to allow schools to submit the Coronavirus Indicator for a Pell Grant or Iraq and Afghanistan Grant disbursement even if the program and award year has passed the data submission (closeout) deadline, or a school has been confirmed closed out (by school or FSA). Disbursement maintenance for additional non-financial fields (e.g., Payment Period Start Date) submitted simultaneously with the Coronavirus Indicator will also process. Schools will not need to request Reopen/Extended Processing through the COD website to make these updates. **Note:** Additional edits will trigger for all programs on disbursements if financial changes are submitted at the same time as the Coronavirus Indicator. You must make any financial updates to disbursements prior to updating the Coronavirus Indicator.

**Note:** The validation edit will be returned if the schools receive a Common Record web response (CRWB message class).