Perkins Loan Assignments -PASSING THE BUCK

Presented by: Flo Olney, CSU East Bay Rechelle Brown, Coast Professional, Inc.







A Little About CSU East Bay









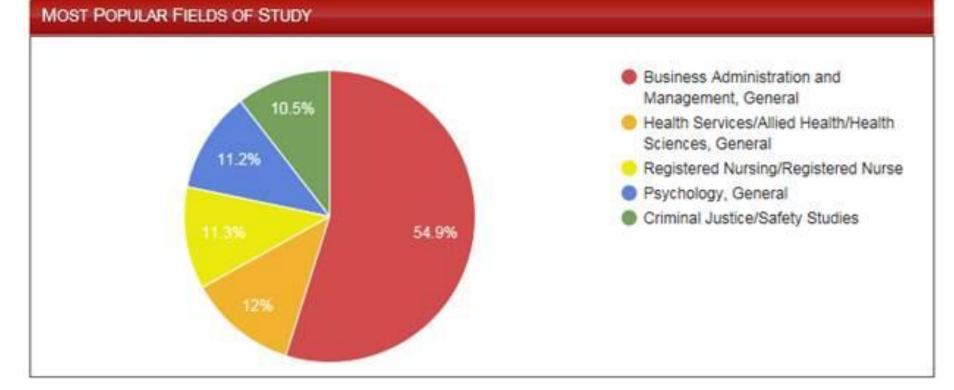


- Founded in 1957 as California State University, Hayward one of the 23 CSU campuses
- Located in Southern Alameda County, Hayward 23 Miles from San Francisco International Airport
- Name changed from CSU, Hayward to CSU, East Bay in 2005
- Accredited by the Western Association of Schools and Colleges
- Academic programs Undergraduate, Graduate, and Doctorate in Education
- 4 Colleges
 - The College of Arts, Letter & Social Sciences
 - The College of Business and Economics
 - The College of Education and allied Studies
 - The College of Science
- Over 110 majors and minors offered





Popular majors – Business Administration, Liberal Studies, Computer Science, Communication, and Art:

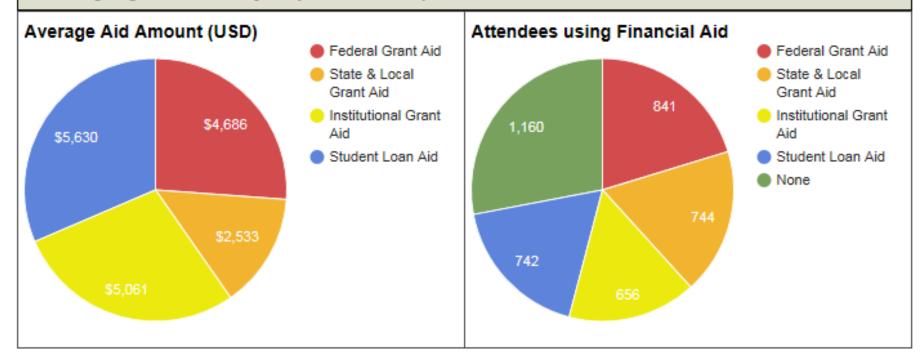






STUDENT FINANCIAL AID DETAILS

Ranks <u>4626th</u> for the average student loan amount. Secrets to getting the best <u>scholarships and financial aid</u> in California.







CSU East Bay Process

- ECSI Billing Service Provider
- New loan advances: Monthly data Extract from Peoplesoft to ECSI
- Paper folder for each new debtor
- Perkins loan disbursements: batch process handled by Financial Aid office
- E-sign for MPN Accounting Technician reviews loan references
- Perkins loan refunds twice a week





- Exit Business Process when student graduates
- Exit letter sent 3 weeks prior to student's last quarter
- Hold placed on student's account to force contact
- Contact debtor by phone, in person or e-mail:
 - Payment Options
 - Rehabilitation
 - Forbearance/Deferment/Cancellation
 - Payment Plan
 - Default







- Collection efforts by ECSI
- Monthly report to monitor debtor status
- Cycle through 3 collection agencies
- Letter to debtor to notify loan to be assigned to ED
- Borrowers have 15 days to respond
- Prepare and submit assignment package if no response





Perkins Assignments and the SFA Handbook



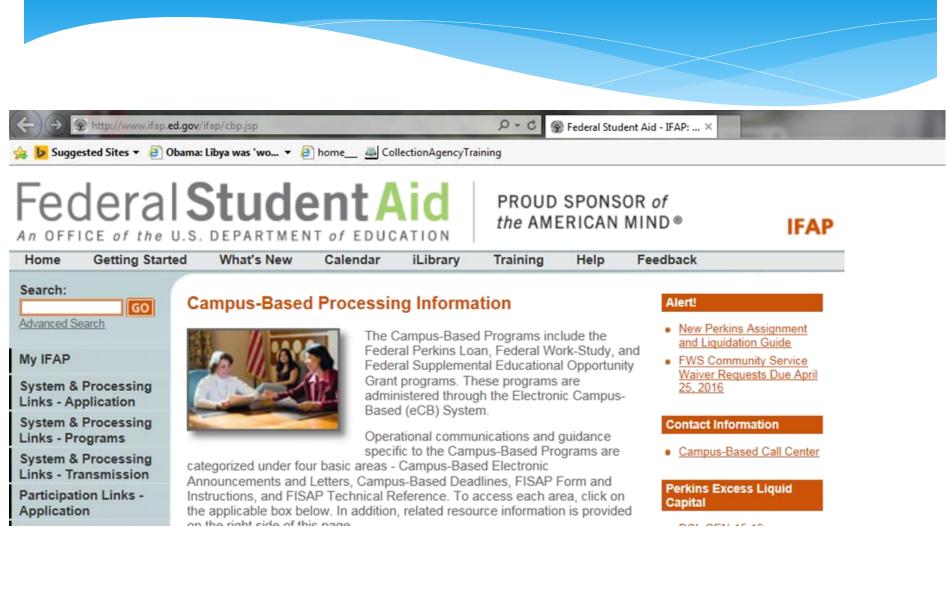
Perkins Assignment criteria is included in Volume 6 of the SFA Handbook in Chapter 5 – Perkins Loan Billing, Collection, and Default

http://ifap.ed.gov/fsahandbook/attachments/1516FSAHbkV ol6Ch5.pdf

Electronic Announcement on 3/30/16 notified that Perkins Loan Assignment Guide is now available on the Campus-Based Processing Information Page http://ifap.ed.gov/eannouncements/033016FedPerkinsLoa nAssignLiquidGuideAvailOnIFAP.html











Perkins Fund Assignment Procedures

http://ifap.ed.gov/cbpmaterials/attachments/Federal PerkinsLoanAssignmentProcedures.pdf

Perkins Fund Liquidation Procedures http://ifap.ed.gov/cbpmaterials/attachments/Federal PerkinsLoanLiquidationProcedures.pdf







If normal billing procedures are exhausted and a borrower is unresponsive, a first effort to collect is required. This may be done by the institution or by a third party collection agency.

A second collection effort may be made using the institution's personnel or a different collection firm, or the school must submit the account to the Department for Assignment.

If the loan is not assigned, a yearly effort to collect is required until the loan is resolved.





Pass the Buck or Not? Pros and Cons of Assignments

Benefits of passing the buck:

- Reduced servicing expenses
- Relief from reporting requirements
- Reduced audit exposure and liability with fund liquidation
- Availability of staff to work on collection of other receivables

Consequences of passing the buck:

- Does not replenish Perkins fund, which reduces ability to make future loans
- May incur expense for assignment package prep
- Reduces benefits to future borrowers in certain fields
- Loss of Institutional Capital Contribution





A Perkins Loan is eligible for assignment if:

- Loan has been accelerated
- Due diligence has been completed, including at least a first level collection effort
- The total to be assigned is greater than \$25.00, including principal, interest, late charges and collection costs.



Loans may not be assigned if:

- Loan was discharged in bankruptcy
- Loan was litigated (unless the judgment has been entered and is assigned to the Department)
- Loan is canceled due to death of a borrower





Notification to Borrowers

- Schools must notify borrowers of pending assignment at least 90 days prior to assignment
- Payments received after certification date must be forwarded to the Department unless the assignment is rejected
- Borrowers should be referred to the Department's Customer Service Center and not the central office
- Credit bureau(s) must be updated







What documentation is required to prepare a Perkins loan default assignment?

- Submission Package Manifest
- Institutional Certification Form OMB 1845-0048
- Borrower Loan and Information OMB 1845-0048
- Promissory Note, MPN or e-MPN (Original or certified copy)
- Certified copy of judgment, if applicable
- Bankruptcy documents
- Due Diligence documentation







- For e-signed MPN's, school's most recent audit must verify that the e-sign process meets ED's e-sign standards
- Copy of the repayment schedule
- Complete statement of the payment history
- Copies of all approved requests for deferment and/or cancellation
- Copy of the acceleration notice to the borrower showing the effective date of the acceleration and the total amount due





Documentation that MAY be required:

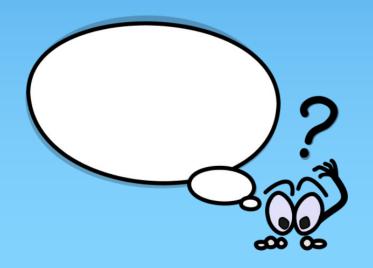
- Evidence that the loan has been recalled from collection agency or other firm
- Copies of all pleadings filed or received for borrower who filed a petition in bankruptcy
- Certified copy of any judgment order entered on the loan
- Due diligence certification





Reasons to Assign:

Default Closed School Fund Liquidation Total & Permanent Disability







ording to the Paperwork Reduction Act of 1995, no persons are required to respond to the information unless such collection displays a valid OMB control number. The valid plete this information collection is stimulated to average 30 minutes per response, including inter to review instructions, search existing data resources, gather the data needed, and plete and review the information collection. If you have any comments concerning the tracy of the time estimate(s) or suggestions for improving this form, please write to U.S. artment of Education, Operations Services, Processing Division, Perkins Loan guments, 50 Beale Street, Suite 8601, San Francisco, CA 94105. Federal Perkins Loan Program/NDSL Assignment Form: Institutional Certification
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Federal Perkins Loan Program/NDSL
orrower(s) named on the attached manifest received Federal Perkins Loan Program, National Direct Student Loan Program, or National
use Student Loan Program loan(s) authorized under Title IV, Part E, of the Higher Education Act of 1965, as amended, or authorized under
II of the National Defense Education Act. The institution is assigning all rights and title under such note or agreement to the United States
rtment of Education, without recompense as provided under Section 463(a)(5), 20 U.S.C. 1087cc.
TON A - INSTITUTIONAL INFORMATION
ame of Institution 2. OPEID Number
reet Address of Institution
y 5. State 6. ZIP
TON B - CERTIFICATION
erstand that if I knowingly make a false statement or misrepresentation on this form in the course of assigning loans to the United States
issuant data if a knowing y make a task statement of intracepresentation on this form in the Course of assigning totals to the Omited States trament of Education, I am subject to a fine of up to \$10.000 or imprisonment of up to five (5) years or both under provisions of the United
s Criminal Code, 18 U.S.C. 1001.
ped Name of Authorized Institutional Official 8. Telephone Number
ped Title of Authorized Institutional Official 10. Alternate Contact Person
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gnature of Authorized Institutional Official I2. Certification Date (MM/DD/YYYY) ION C=MANI122ST Rections: Attach a manifest to this form listing the loans that are being assigned. The institution name and OPEID Number must appear at p of each page of the manifest. The manifest must be in the following format: Borrower's Name and Loan Type Interest Rate Total Amount Outstanding Date of First
gnature of Authorized Institutional Official



OMB 1845-0048 Institutional Certification Form (Exp. 11/30/2015)



Sample Manifest

SUBMISSION PACKAGE MANIFEST

Name of Institution OPE ID

Borrower's Name	Social Security Number	Loan Type	Interest Rate	Total Amount Outstanding (Section D, Item #37)	Date of First Disbursement
HOLMES, SHERLOCK	123-45-6789	Р	5.0%	\$7,654.32	8/21/2007
KENT, CLARK	987-65-4321	- I	3.0%	\$1,234.56	9/22/1992
PAN, PETER	111-22-3333	E	3.0%	\$4,321.01	10/12/1978





Federal Perkins Loan Program/NDSL Assignment Form: Borrower and Loan Information

rissigninent i orm. Do	Hower and Loan Information	Expiration Date: 11/30/2015
SECTION A - BORROWER INFORMATI	ION	
1. Current or Last Known Name (Last, First, M	u)	2. Previous Name(s) (Optional)
3. Social Security Number	4. Date of Birth (MM/DD/YYYY)	5. Departure Date (MM/DD/YYYY)
6. Current or Last Known Permanent Address	s (Number and Street)	7. Telephone Number
8. City	9. State	10. Zip Code
	J	
SECTION B - COSIGNER INFORMATIO)N (Complete if applicable)	
11. Name of Cosigner of Loan (Last, First, MI)		12. Social Security Number of Cosigner (optional)
13. Current or Last Known Permanent Addre	ss of Cosigner (Number and Street)	14. Telephone Number
15. City	16. State	17. Zip Code
SECTION C - LOAN INFORMATION: H	ISTORICAL	
18. Type of Loan (Check appropriate space)	19. Applicable Interest Rate on th	e Loan
Perkins 🔿 Direct 🔿 Defense 🔿	%	
20. Date of Last Disbursement (MM/DD/YYYY)	21. Date Last Grace Period Ended or Will End (MW/DD/YYYY)	22. Date of Default, if defaulted (MM/DD/YYYY)

OMB Number: 1845-0048

Form Approved

OMB 1845-0048 Borrower and Loan Information Form (Exp. 11/30/2015)

23. Was this loan ACCELERATED? (Check appropriate space)

If YES, provide date of acceleration. If NO, provide date this loan became fully mature (due-in-full). In the case of a non-defaulted loan that has neither been accelerated nor matured (such as a total and permanent disability discharge or if the schools closing out the program), check "No" and leave the date blank.

YES C NO C Date (MM/DD/YYYY)

24. Was this loan LITIGATED? (Check appropriate space) If YES, provide effective date and attach judgement.

YES	$^{\circ}$	NO	O	Date (MM/DD/YYYY)
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25. Borrower Repayment Status, if loan is not in default.

In School Grace Period Deferment 0 Repayment 0

26. Reason this loan is being assigned or has been determined uncollectible. (Check appropriate space)

Hardship O Incarceration Unemployment O Liquidation

Refusal to Pay 🔿 Address Unknown 🔿 Total and Permanent Disability 🖒 Other (Please Explain Below) 🔿





SECTION D - LOAN INFORMATION: FINANCIAL

27. Disbursement Amount	28. Principa	l Amount Adju	isted	29. Principal Amount	Repaid
30. Principal Amount Cancelled	31. Principa (27 less 28, 1	l Amount Outs 29, & 30)	standing	32. Collections Costs F	Repaid
33. Interest Repaid	34. Interest	Cancelled		35. Interest Due	
36. Collection Costs/Penalty/Late Charges	37. Total An	nount Outstan	ding (Sum of Ite	ems 31, 35, and 36)	
SECTION E - CANCELLATION INFORM					
	Cancellatio	n(s) Granted fo	or this Loan		
38. Type of Cancellation	39. Percentage Rate	40. Principal Cancelled	41. Interest Cancelled	42. Cancellation Service Start Date (MM/DD/YYYY)	43. Cancellation Service End Date (MM/DD/YYYY)





Passing Inspection

Promissory Note/MPN/e-MPN

Original Document or certified copy of the original

Certified True Copy

I declare under penalty of perjury that the foregoing is a true and correct copy of the original promissory note.

Signature:

Title:

Date:





It's important to remember...

If you assign loans made under the Perkins MPN, you must maintain disbursement records that document the principal amount loaned until the loan is paid off or otherwise satisfied. You may include disbursement records with the assignment submission. Record retention requirements pertain to any documentation related to the loan that is not included with the assignment package.







Alternate Documentation Requirements

- Copies of front and back of disbursement checks or vouchers
- Original legal judgment with the appropriate transfer statement



 Missing or defective promissory notes or missing or incomplete bankruptcy or judgment information require formal approval by an appropriate Department official.



Specific questions pertaining to the procedures for assignment of accounts or pertaining to the correction of rejected submissions, can be directed to **PerkinsLoanAssignments@ed.gov.**

Written inquiries should be mailed to:

Federal Student Aid U.S. Department of Education Operation Services, Processing Division 50 Beale Street, Suite 8601 San Francisco, CA 94105-1813



For assignment verification of accounts submitted more than 60 days previously, please email **PerkinsLoanAssignments@ed.gov.** In order to verify the submission, the email must include the student(s) name(s) and Social Security number(s) in an encrypted file.





Missing or defective promissory notes or missing or incomplete bankruptcy or judgment information require formal approval by an appropriate Department official. All such explanations should be prepared in writing, with the following signature block provided:

Approved/Not Approved _____ Assignments Specialist Operation Services, Processing Division Perkins Loan Assignments

Explanations must reference the specific account(s) affected by the documentation omission or irregular nature. The explanatory letter should be submitted to **PerkinsLoanAssignments@ed.gov.**

A returned approving email will constitute formal approval.





Pass the buck to:

ECSI Federal Perkins Loan Servicer 100 Global View Drive, Suite 800 Warrendale, PA 15086



All assignment packages should be double-packaged in opaque materials with the "To" and "From" addresses included on both the inner and outer packages. May be sent via USPS, FedEx or UPS. Send with delivery confirmation required.

The package should NOT identify the sensitivity of the contents.





ECSI reviews packages for required documentation.

Schools are notified of any missing required information by phone or email to attempt to resolve the deficiency. At least two attempts are made.



If the deficiency is not resolved, the assignment will be rejected and returned to the school after 8 days with a report explaining the return reason.









Pass/Fail

Approved Assignments

- Official Acceptance Notice will be provided to institution – Report NCLM710B
- Retain report
- Provide copy to loan servicer
- Reports/notices will be mailed to the address in the institution's program participation agreement

Rejected Assignments

- Deficient documentation or corrections may be made on rejected forms with changes initialed for resubmission
- Corrections must be made in black or blue ink with each change initialed
- Verify changes do not impact other dates
- Recalculate certification date and interest if resubmission is more than 45 days after return date





Process for the Cure

For rejects based on mandatory due diligence not performed, cure process must be completed by institution

- Locate borrower
- Sent letter regarding default status of loan
- Send borrower copy of signed promissory note and new repayment schedule to sign and return to school
- Initiate collection procedures and complete entire process
- Provide documentation that process has been completed using label "Due Diligence Using Cure Process"









If a school litigates a Perkins loan and is awarded a judgment, the loan may be assigned if the judgment is assigned to the US Department of Education. Some states require the assignment to be filed with the court.

For states not requiring assignment of judgment through the court, the school may assign the judgment by having an official authorized to release assets sign the statement to assign the judgment.

"All rights, title and interest of the undersigned in this judgment are hereby assigned to the United States of America."



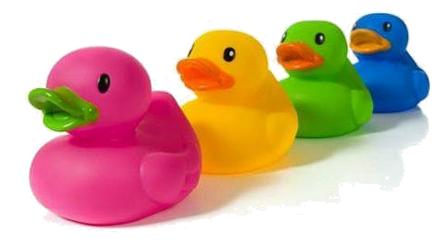


After the buck is passed:

Schools may obtain confirmation of paid in full status for borrowers requesting transcripts or other services by contacting the School Customer Service Center at:

Phone:866-313-4130 E-mail: clientsupport@efpls.com

Borrowers may call: 866-313-3797







TPD Assignments

Submit all TPD assignment packages to:

US Department of Education 121 South 13th Street, Suite 201 Lincoln, NE 68508

Refer to June 12, 2013 Electronic Announcement http://ifap.ed.gov/eannouncements/attachments/PerkinsTPDDischarge AssignmentProceduresAttach.pdf

www.disabilitydischarge.com

School notifications are through the SAIG mailbox only. Nelnet is responsible for TPD assignments and processing.





Borrower Correspondence and Payments after Default Assignment

Mail Correspondence to:

US Department of Education ECSI Federal Perkins Loan Servicer 100 Global View Drive, Suite 800 Warrendale, PA 15086

*Include borrower name, SSN and loan type

Mail Payments to:



Department of Education ECSI Federal Perkins Loan Servicer PO Box 105765 Atlanta, GA 30348-5765

*Include borrower name, SSN and loan type





Perkins Loan Assignment System (PLAS)

Schools may now submit Perkins Loan assignments to the Department electronically

http://ifap.ed.gov/eannouncements/attachments/0921 15PerkinsLoanAssignmentSystemSystemAvailandUser AccessInfoAttach.pdf







- Submit single or multiple loans
- Securely upload documentation
- Search, view and edit submitted assignment information
- Upload prom notes (NOTE: Hard copies must still be mailed)
- Request system access at <u>https://efpls.com</u>









Need Help

Logging In?

Users

Technical Guide

Access

Form

Request



- A DPA and PPA Official's signature are required as well as a user's FSA security token serial number to complete the access request.
- School will need to designate an Institutional Administrator. This person can then request access for as many PLAS users as the school needs.
- School will need OPEID, User Name, Password and Security Token Code to access PLAS for each login attempt.







Completing an Institutional Form will create a batch to which individual assignments can be added.

Assignment Certification Form Administration

New Batches: [Create a New Batch] [Upload a Batch from a File]	
Search Options:	
Batch Number:	(Find
SSN:	[Find
Last Name:	(Find
Date Range: From: 08 / 31 / 2015 To: 09 /	14 / 2015 (find
Date Range: From: 08 / 31 / 2015 To: 09 / Create Batch Report	14 / 2015 [Find
	14 / 2015 [Find
Create Batch Report Entry Form Actions	
Create Batch Report Entry Forms Form Actions Batch #Date StatisticsAlerts 681 09/02/2015 Show View Marifest 682 09/02/2015 Show Select Action	Select
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Create Batch Report Entry Forms Form Actions Batch # Date Statistics/Alerts 681 09/02/2015 Show View Marifest 682 09/02/2015 Show Select Action View Institutional Form	Select Select Select





- Assignment forms in PLAS mimic the paper 1845 form.
- Upload supporting documents
- Execute Batch Validation
- Print the Manifest
- All documentation must be mailed within five (5) business days once the assignment status has been changed to Submitted.







Questions?





Please contact us if we can be of assistance to you

Flo Olney 510-885-3767 flo.olney@csueastbay.edu Rechelle Brown 318-307-3810 rbrown@coastprofessional.com

Corky Mobley 714-673-7578 cmobley@coastprofessional.com



