Federal Student Aid
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DCIA Aging and Compliance Data Requirements

for Guaranty Agencies

October 2022

Financial Management Group
Financial Reporting and Analysis Division

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Version Control			
Version	**Author**	**Date**	**Changes**
1.0	C. Alsop	10/02/2019	Approved by FSA and released for PRA clearance
1.1	C. Alsop	1/13/2020	Updated planned implementation date, Date Acquired Aging Methodology table, Title IV claim types table, and glossary
1.2	C. Carleton	10/5/2022	Minor edits; updated GA and FSA contacts

1.0 Introduction

Federal Student Aid (FSA) uses data supplied by its loan servicers to satisfy mandatory and ad-hoc debt collection reporting requirements related to receivables due from the public. FSA is required to submit receivable information to the United States Department of the Treasury (Treasury), the Office of Management and Budget (OMB), and the Chief Financial Officers' Council (CFOC).

Treasury, OMB, and the CFOC use receivable financial data to:

- monitor the effectiveness of government-wide receivable management processes via performance metrics;
- improve data transparency by publicly releasing agency receivable data on a quarterly basis; and
- inform the United States Congress (Congress) annually of agency debt collection regulation compliance as required by the Debt Collection Improvement Act of 1996, as amended (DCIA).

1.1 Purpose

The purpose of this document is to:

- communicate debt aging requirements per DCIA;
- capture detailed information pertaining to the status and collection of Federal Family Education Loan (FFEL) Program loans authorized by the Higher Education Act of 1965, as amended (HEA) and defined by Title IV of the HEA (Title IV) that is not currently available via the Guaranty Agency Financial Report (GAFR) (also known as the ED Form 2000);
- enable FSA to report complete and accurate data to Treasury, as required; and
- permit FSA to monitor Guaranty Agency (GA) compliance with DCIA.

1.1.1 Limited Purpose of this Document

This specification document requires the GAs prepare three individual Data Sets, collectively called the DCIA Aging and Compliance Data Set (DCIA Compliance Data Set). To prepare the DCIA Compliance Data Set, this document references accounting transactions and GA-specific operational requirements (i.e., the GAFR, Internal Revenue Service (IRS) Form 1099-C reporting, etc.). Any references are solely intended to facilitate the GA's efforts to prepare a compliant DCIA Data Set and are not intended to provide requirements beyond the scope of preparing the DCIA Compliance Data Set.

1.1.2 Points of Contact for Technical Questions

Post-implementation, please submit any technical questions about these requirements via email to the following email addresses:

To: FSAFinancePortfolio@ed.gov

CC: callis.carleton@ed.gov

To facilitate identification, please enter “DCIA Compliance Technical Question” in the email subject line.

1.2 Scope

The scope of this requirements document is the DCIA-specific aging and compliance data requirements. The scope of each of the three Data Sets is discussed later in this document. The three Data Sets are:

- MR-24 Collection Terminations Write-Off Data Set
- MR-32 Loan Ending Balance Aging Data Set
- MR-32 & MR-41 Loan Ending Balance Disposition Data Set

1.2.1 Scope Limitations

The guidance contained in this document is based upon FSA’s policies and business processes as of the date of this document, unless otherwise noted. Any future revision to FSA’s policies and/or business processes may require FSA to update and reissue these requirements.

1.3 Frequency

GAs must prepare and submit the individual Data Sets on a monthly or annual basis as follows:

Table 1.3 Data Set Frequency

Data Set	Frequency
MR-24 Collection Terminations Write-Off Data Set (Write-Off Data)	Annually
MR-32 Loan Ending Balance Aging Data Set (Aging Data)	Monthly
MR-32 & MR-41 Loan Ending Balance Disposition Data Set (Disposition Data)	Monthly

1.4 Document Organization

This document is organized into the following sections:

Table 1.4 Organization of Requirements Document

Section	Section Description
1.0	Introduction: This section provides an overview of the purpose, scope, and frequency requirement for the reports listed in this document.
Aging Specifications	
2.0	DCIA Aging Requirements: This section summarizes the DCIA-compliant aging methodologies applicable to Title IV debt held by GAs.
Data Set Specifications	
3.0	Preparation of the Data Sets: This section provides important information necessary to prepare the DCIA Compliance Data Set.
4.0 through 6.0	DCIA Compliance Data Set Specifications: These sections provide details regarding each Data Set's purpose, scope, frequency, and layout. Line-by-line instructions and a presentation view of the Data Set are also included in each section.
7.0	Submission to FSA: This section explains how to package the files for submission to FSA.
Appendixes	
A	This appendix presents an example of an approved GAFR.
B	This appendix presents an example of the Disposition Data Set when uploaded to Microsoft Excel.
C	This appendix provides a mapping of GA TOP Referral Business Rules to the Disposition Data Set lines.
D	This appendix lists active GAs by their GA codes.
E	This appendix lists commonly used acronyms referenced throughout this document.

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2.0 DCIA Aging Requirements

2.1 Background

This section describes the compliant methodologies for aging Title IV loan debt for DCIA purposes[1]. This section also explains how to determine a loan's eligibility for referral to the Treasury Offset Program (TOP) based upon the loan's age of delinquency (i.e., greater than 120 days delinquent). This section also explains how to age DCIA-aged debt in accordance with the United States Department of Education (the Department) and Treasury's Office of General Counsel (OGC) guidance. The methodology described in this section is independent of the methodologies followed to age debt for other purposes including for Title IV. As such, this guidance is not intended to revise or replace any of other aging methodologies the GAs are required to follow.

2.2 Definitions of Key DCIA-Related Terms

Listed below are key DCIA-related terms used later in this section and throughout this document. To facilitate identifying these terms, all key terms are capitalized.

- **DCIA Aging Methodology for Title IV Loan Debt**: The methodology to age Title IV loan debt for DCIA purposes including determining a debt's eligibility for referral to TOP based upon its age. Section 2.3 of this document includes a full description of the DCIA Aging Methodologies including: 1) criteria for identifying debt to apply the methodology, 2) methodology for determining debt age in number of days, 3) methodology for calculating dollar amount to report, and 4) criteria for transitioning to another aging methodology.

- ***Title IV* Default:** Per *Title IV*, a loan enters default if the loan exceeds 270 days of delinquency. [2] Based upon existing business processes, all *Title IV* debt held and serviced by a GA is in *Title IV* Default.

[1] The aging methodology to follow and consequently how to age GA-held debt is independently determined for each individual debt.

[2] 20 U.S.C. 1085(*l*)

- ***Title IV* Claim Types:** Per *Title IV*, a GA can request reimbursement from FSA for Defaults and other FFEL Program claims it paid to lenders. Claims paid to lenders and included in the federal receivable[3] are aged. Claims paid to lenders and not included in the federal receivable are not aged and, as a result, neither of the two GA-applicable DCIA Aging Methodologies are applicable.

	Included in the Federal Receivable and Aged for DCIA	**Not Included in the Federal Receivable and Not Aged for DCIA**
***Title IV* Claim Types**	• Defaults • Exempt/Lender-of-Last-Resort (LLR)	• Death/Disability[4] • Closed School/False Certification • Bankruptcy • Unpaid Refunds • Other Discharges[5]

2.3 DCIA Aging Methodologies Applicable to GAs

Per DCIA, there are two distinct aging methodologies applicable to GAs. The appropriate methodology is determined by the *Title IV* Claim Type of the debt (i.e., Defaults, Exempt/LLR are included in the federal receivable and aged; all other claim types are not included in the federal receivable nor aged).

The remainder of this section describes each of the two DCIA aging methodologies in more detail. Note, per DCIA, there are only two possible DCIA Delinquency Statuses – Current or Delinquent. Based upon existing business processes, debt held by a GA is always "delinquent" for DCIA purposes.

[3] The federal receivable is defined as the amount reported on MR-32 Ending Balance of Defaulted Loans. The amount reported on MR-32 is reported on FSA's financial statements.

[4] Disability claims are also called Total and Permanent Disability Discharge (TPD Discharge) claims.

[5] Other discharges include Teacher Loan Forgiveness Program discharges and partial discharges of consolidation loans.

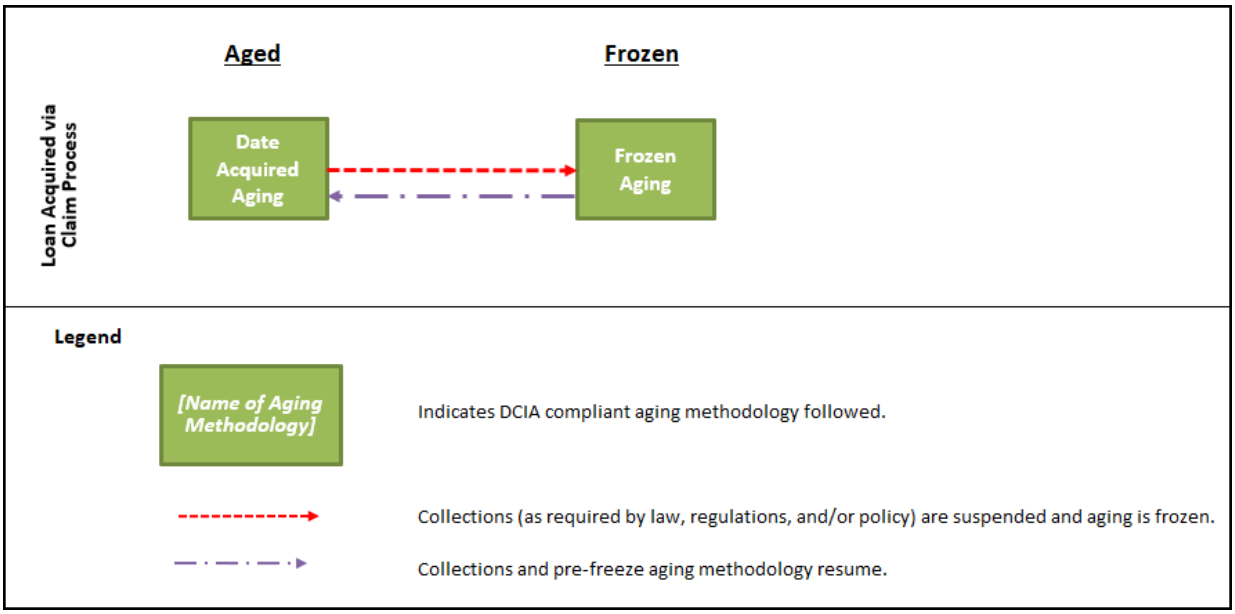

Figure 1 - Relationship between DCIA Aging Methodologies for Debt Held by GAs

2.3.1 Date Acquired Aging

For DCIA purposes, a debt in the Default Title IV Loan Status should be aged using the Date Acquired Aging Methodology unless the Frozen Aging Methodology is triggered.

The following table describes the Date Acquired Aging Methodology.

Table 2.3.1 Date Acquired Aging Methodology

Date Acquired Aging Methodology	**Applicability and Criteria**	
	Applicable for Title IV Claim Types	• Defaults • Exempt/LLRs
	Criteria to Start Aging Methodology:	• Default claim debt acquired by FSA via the FFEL claim process (i.e., GA pays a lender's default claim).
	Methodology	
	Determining Age	• Number of days delinquent (i.e., delinquency) equals current date less date the GA paid the lender's claim (claim date). (Note: If collection on a default claim is suspended, aging should resume from the date the GA restarts its collection efforts.)
	Valid DCIA Delinquency Status(es)	• Delinquent[6]
	Determining Dollar Value of Delinquency	• Dollar value of delinquency is the accelerated full balance due including principal, interest, and fees.
	Transition to Another DCIA Aging Methodology	
	Aging Methodology and Criteria for Switching:	• Frozen Aging – Collections on a default claim debt are suspended as required by law, regulation, and/or policy.

[6] "Delinquent" is the only valid DCIA Delinquency Status for this aging methodology because based upon existing business processes, all *Title IV* debt held by GAs is delinquent.

2.3.2 Frozen Aging

For DCIA purposes, a debt in the Default Title IV Loan Status should be aged using the Frozen Aging Methodology unless the Date Acquired Aging Methodology is triggered. This methodology should be followed for the duration of the event that triggered the suspension of collection efforts and froze the age of the debt.

The following table describes the Frozen Aging methodology.

Table 2.3.2 Frozen Aging Methodology

Frozen Aging Methodology	**Applicability and Criteria**	
	Applicable for Title IV Claim Types	• Defaults • Exempt/LLRs
	Criteria to Start Aging Methodology:	• GA suspends collection efforts for a default claim debt as required by law, regulation, and/or policy.[7]
	Methodology	
	Determining Age:	• Age of debt is frozen as of the date the loan entered the Frozen Aging Methodology.
	Valid DCIA Delinquency Status(es):	• Delinquent[8]
	Determining Dollar Value of Delinquency:	• Dollar value of delinquency is the accelerated full balance due as of entering the Frozen Aging Methodology (since the accrual of interest and fees is also frozen).
	Transition to Another DCIA Aging Methodology	
	Aging Methodology and Criteria for Switching:	• Date Acquired Aging – For default claim debt, the GA resumes collection efforts.

[7] Events that may warrant suspended collections include a defaulted debt meeting the criteria for the military deployment benefit, pending discharge due to death, pending discharge due to TPD, and bankruptcy stay/hold.

[8] Delinquent" is the only valid DCIA Delinquency Status for this aging methodology because

based upon existing business processes, all *Title IV* debt held by GAs is delinquent.

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3.0 Preparation of the Data Sets

3.1 Common Requirements

Sections 4.0–6.0 provide line-by-line instructions explaining the specific information required for each Data Set requirement. Appendixes B and C contain supplemental information which should be used when developing and preparing the Disposition Data.

3.1.1 Common Requirements

The collective DCIA Compliance Data Set must comply with the requirements listed below.

Table 3.1.1 Common Requirements for the DCIA Compliance Data Set

Common Requirements	
1.	Report “Number” as the quantity of debts (i.e., number of loans).
2.	Report “Dollars” as the sum of all amount types (i.e., principal, interest, and other fees[9], if applicable) that result in activity or a balance.
3.	Sum all activity and balances for a line. If the total results in a debit balance, report the amount as positive. If the total results in a credit balance, report the amount as negative.
4.	Do not use commas for amounts that have four or more digits. For example, $2,758.39 should be entered as 2758.39; 1,078 debts should be entered as 1078.
5.	Enter all dollar amounts rounded to the nearest cent/penny. Enter all debt quantities as whole numbers without cents/pennies.
6.	Enter a debt number of “0” and dollar amount of “0.00”, unless otherwise stated, if there are no debts that meet the reporting requirements for a given line.
7.	Do not password protect report files unless required to by FSA or your agency’s data protection policies (i.e., because the files contain personally identifiable information or sensitive data).
8.	Submit each data requirement as a Comma-Separated Value [Comma Delimited] (CSV) file and follow the layout specified.

[9] Examples of possible other fees include late charges, collection costs, and attorney’s fees.

3.2 Section Outline

Each Data Set requirement section follows a consistent outline or format. Specifically, each requirement contains the following sections:

- Purpose
- Scope
- Frequency
- A high-level overview/summary of the Data Set requirement
- Line-by-line instructions
- A presentation of the Data Set in Microsoft (MS) Excel format.

3.3 File Layout Requirement

Each Data Set requirement references the following file layout terms:

File Layout Term	Description
Data Element Name	Required field (or “column”) name
Line Name	Required line (or “row”) name
Portfolio Data	Loan data that meets the criteria for each Line Name (i.e., Number and Dollars values reflected in the GA’s system of record)
Identifier Data	GA Code and Reporting Period information required for each line

The specific requirements for each report’s Data Element Names, Line Names, Portfolio Data, and Identifier Data are described in the following sections. GAs should follow the file layout requirement presented for each Data Set requirement as it will ensure that FSA will be able to consolidate data received from multiple GAs across multiple periods of time.

The remainder of this document and the examples presented will focus on a fictitious GA (i.e., GA 999) and its DCIA Compliance Data Set submission for the month-ending March 31, fiscal year (FY) 2020.

4.0 MR-24 Collection Terminations Write-Off Data Set

4.1 Purpose

The MR-24 Collections Terminations Write-Off Data Set (Write-Off Data) is required in order to monitor GA compliance with IRS Form 1099-C reporting.

4.2 Scope

The scope of the data is debt reported on GAFR line MR-24 Collection Terminations during the previous calendar year (CY) (i.e., January through December).

Table 4.2 Reporting Period Scope of Collection Terminations

Current Reporting Period					Reporting Period Scope of Collection Terminations to Report (I.E., Previous Calendar Year)
FY	Quarter	Reporting Cycle Calendar Month/Year			
FY 2023	Q1	October	2022	=	Collection terminations reported during the previous CY (i.e., 2021).
		November	2022		
		December	2022		
	Q2	January	2023	=	Collection terminations reported during the previous CY (i.e., 2022)*.
		February	2023		
		March	2023		
	Q3	April	2023		
		May	2023		
		June	2023		
	Q4	July	2023		
		August	2023		
		September	2023		

* Per IRS requirements, if filing electronically, reporting entities must submit Form 1099-C to the IRS by the end of March immediately following the end of the CY being reported (i.e., Form 1099-Cs for collection terminations reported during calendar 2022 should be submitted to the IRS by March 2023).

4.3 Frequency

Each GA must prepare Write-Off Data annually. Per IRS requirements, electronically filed Form 1099-Cs are due by the end of March immediately following the end of the CY being reported. Therefore, in accordance with the IRS' March 31st deadline for electronically filed Form 1099-Cs, Write-Off Data is due to FSA in the following month (i.e., in April of each year).

4.4 Overview of Data Set Requirement

The Write-Off Data Set captures information related to activity reported on MR-24 during the previous CY and allocates it by disposition type (i.e., reported to the IRS, not reported to the IRS because the amount was less than $600, and not reported to the IRS for other reasons). The Write-Off Data is reported to FSA via the following Data Elements:

- Disposition status (i.e., line name)
- Number
- Dollars
- GA code
- Calendar year.

4.5 Data Set Requirements

Line 1 - Data Element Names

Report the five required Data Element Names as shown in the table below.

Data Element	Data Element Name
1	DISPOSITION_OF_COLLECTION_TERMINATIONS
2	NUMBER
3	DOLLARS
4	GA_CODE
5	CALENDAR_YEAR

Line 1 should display as follows:

```
DISPOSITON_OF_COLLECTION_TERMINATIONS,NUMBER,DOLLARS,GA_CODE,CALENDAR_YEAR
```

Line 2 - Collection Terminations Reported During the Previous Calendar Year

Report the total collection terminations reported on MR-24 during the previous CY.

The table below lists the Data Elements and criteria to report.

Data Element	Criteria	Example
DISPOSITION_ OF _COLLECTION _TERMINATIONS	Line Name	Report “Collection Terminations Reported During the Previous Calendar Year”.
NUMBER	Number (i.e., quantity of debts) that meets the scope of the line.	If 5,478 loans meet the criteria for this line, report the value as “5478”.
DOLLARS	Dollar (i.e., debt/loan amount) value that meets the scope of the line.	If $879,652.15 meets the criteria for this line, report the value as “879652.15”.
GA_CODE	3-digit GA Code	Report “999”.
CALENDAR_YEAR	4-digit CY	Report “2019”.

Note About Line 2 Collection Terminations Reported During the Previous Calendar Year

Line 2 serves as a control and must agree to the sum of principal, interest and other amounts for the preceding 12-month CY as reported on GAFR line MR-24. If a GA submits this Data Set and Row 2 does not agree to the preceding 12-month CY MR-24 total, FSA will reject the GA’s submission and return it for correction.

Line 2 should display as follows:

```
Collection Terminations Reported During the Previous Calendar Year,5478,879652.15,999,2019
```

Line 3 - Reported to IRS on Form 1099-C

Report the amount of total collection terminations reported on MR-24 during the previous CY (i.e., reported on Line 2) and reported to the IRS via Form 1099-C.

The table below lists the Data Elements and criteria to report.

Data Element	Criteria	Example
DISPOSITION_ OF _COLLECTION _TERMINATIONS	Line Name	Report “Reported to IRS on Form 1099-C”.
NUMBER	Number (i.e., quantity of debts) that meets the scope of the line.	If 72 loans meet the criteria for this line, report the value as “72”.
DOLLARS	Dollar (i.e., debt/loan amount) value that meets the scope of the line.	If $24,893.54 meets the criteria for this line, report the value as “24893.54”.
GA_CODE	3-digit GA Code	Report “999”.
CALENDAR_YEAR	4-digit CY	Report “2022”.

Line 3 should display as follows:

```
Reported to IRS on Form 1099-C,72,24893.54,999,2019
```

Line 4 - Not Reported and Eligible for 1099-C but Not Required (Less than $600)

Report the amount of total collection terminations reported on MR-24 during the previous CY (i.e., reported on Line 2) that were eligible for 1099-C reporting but were not reported to the IRS via Form 1099-C.

The table below lists the Data Elements and criteria to report.

Data Element	Criteria	Example
DISPOSITION_ OF _COLLECTION _TERMINATIONS	Line Name	Report “Not Reported and Eligible for 1099-C but Not Required (Less than $600)”.
NUMBER	Number (i.e., quantity of debts) that meets the scope of the line.	If 10 loans meet the criteria for this line, report the value as "10”.
DOLLARS	Dollar (i.e., debt/loan amount) value that meets the scope of the line.	If $5,789.87 meets the criteria for this line, report the value as “5789.87”.
GA_CODE	3-digit GA Code	Report “999”.
CALENDAR_YEAR	4-digit CY	Report “2022”.

Line 4 should display as follows:

Not Reported and Eligible for 1099-C but Not Required (Less than $600),10,5789.87,999,2019

Line 5 - Not Reported to IRS on Form 1099-C (Must Footnote)

Subtract Line 3 and Line 4 from Line 2.

The table below lists the Data Elements and criteria to report.

Data Element	Criteria	Example
DISPOSITION_ OF _COLLECTION _TERMINATIONS	Line Name	Report “Not Reported to IRS on Form 1099-C (Must Footnote)”.
NUMBER	The balance remaining after subtracting the Number value of Line 3 and Line 4 from Line 2.	Report the Numbers result of subtracting Line 3 and Line 4 from Line 2 (i.e., 5,396) as “5396”.
DOLLARS	The balance remaining after subtracting the Dollars amount of Line 3 and Line 4 from Line 2.	Report the Dollars result of subtracting Line 3 and Line 4 from Line 2 (i.e., $84,8968.74) as “848968.74”.
GA_CODE	3-digit GA Code	Report “999”.
CALENDAR_YEAR	4-digit CY	Report “2022”.

Note About Line 5 Not Reported to IRS on Form 1099-C

Line 5 should represent collection terminations from the prior CY that were not reported to the IRS on Form 1099-C due to reasons other than being less the $600. The reason(s) for not reporting to the IRS debt included on this line must be explained in a separate footnote. The explanation can be included in the body of the submission email or added as a separate MS Word file attachment. See Section 7.0 Submission to FSA for more information.

Line 5 should display as follows:

Not Reported to IRS on Form 1099-C (Must Footnote) ,5396,848968.74,999,2019

4.6 File Naming

The GAs should use the following file naming configuration.

Table 4.6 Write-Off Data File Naming Configuration

Required File Naming Configuration	Example
yyyymm-WOFF-ccc *Where* • "yyyy" = 4-digit fiscal reporting year • "mm" = 2-digit fiscal reporting month • "WOFF" = data set short name • "ccc" = 3-digit GA code	GA 999 will name the CSV or text file for Write-Off Data as of March 31, 2023 as follows: • 202306-WOFF-999.csv

4.7 Presentation

If the Write-Off Data Set is prepared correctly, when uploaded to MS Excel or MS Access, the Data Set will display as shown:

	A	B	C	D	E
1	DISPOSITON_OF_COLLECTION_TERMINATIONS	NUMBER	DOLLARS	GA_CODE	CALENDAR_YEAR
2	Collection Terminations Reported During the Previous Calendar Year	5478	879652.15	999	2019
3	Reported to IRS on Form 1099-C	72	24893.54	999	2019
4	Not Reported and Eligible for 1099-C but Not Required (Less than $600)	10	5789.87	999	2019
5	Not Reported to IRS on Form 1099-C (Must Footnote)	5396	848968.74	999	2019

Note About Abnormal Balances

The expected sign for all debt quantities and dollar amounts for this Data Set is positive. Any abnormal balances must be researched and explained. The explanation can be included in the body of the submission email or added as a separate MS Word file attachment. See Section 7.0 Submission to FSA for more information.

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5.0 MR-32 Loan Ending Balance Aging Data Set

5.1 Purpose

The MR-32 Loan Ending Balance Aging Data Set (Aging Data) is required in order to age debt per DCIA and to facilitate determining a debt's eligibility for TOP referral.

5.2 Scope

The scope of the data is debt reported on GAFR line MR-32 Ending Balance of Defaulted Loans as of fiscal month-end.

5.3 Frequency

Each GA must prepare the Aging Data as of each fiscal month-end for which it also prepares a GAFR report (i.e., monthly).

5.4 Overview of Data Set Requirement

The Aging Data captures additional information related to the ending balance of defaulted debt reported on MR-32. The debt is aged per the applicable DCIA aging methodologies (see Section 2.0) and grouped into categories based on the number of days the debt is delinquent. The Aging Data is reported to FSA via the following Data Elements:

- Aging category (i.e., days delinquent)
- Number
- Dollars
- GA code,
- Fiscal year
- Fiscal month

5.5 Data Set Requirements

Line 1 - Data Element Names

Report the six required Data Element Names as shown in the table below.

Data Element	Data Element Name
1	AGING_CATEGORY
2	NUMBER
3	DOLLARS

Data Element	Data Element Name
4	GA_CODE
5	FISCAL_YEAR
6	FISCAL_MONTH

Line 1 should display as follows:

```
AGING_CATEGORY,NUMBER,DOLLARS,GA_CODE,FISCAL_YEAR,FISCAL_MONTH
```

Line 2–13 - Debt by Age of Delinquency

Report the quantity of debts and loan ending balance by the age category[10].

The required Line Names are the aging categories listed in the table below. The categories are listed by line number.

Line	AGING_CATEGORY
2	1–30 Days Delinquent
3	31–60 Days Delinquent
4	61–90 Days Delinquent
5	91–120 Days Delinquent
6	121–150 Days Delinquent
7	151–180 Days Delinquent
8	181–270 Days Delinquent
9	271–365 Days Delinquent
10	1–2 Years Delinquent
11	2–6 Years Delinquent
12	6–10 Years Delinquent
13	Over 10 Years Delinquent

[10] The loan ending balance is derived from the GA's system of record and corresponds to the balance the GA reported on GAFR line MR-32 as of the month-end reporting date.

Note About Aging Categories

FSA customized the age categories for the Aging Data Set to reflect unique requirements of HEA *Title IV* debt. Specifically, FSA segregated the age categories into 30-day increments to allow breaks at 120, 180, and 270 days delinquent.

As an example, the table below lists the Data Elements and criteria to report for Line 2, 1–30 Days Delinquent. Note: Lines 3–13 would follow the same format.

Data Element	Criteria	Example
AGING_CATEGORY	Debt that is 1 to 30 days delinquent.	Report "1-30_DAYS_DELINQUENT".
NUMBER	Number (i.e., quantity of debts) that meets the scope of the line.	If 5,742 loans meet the criteria for this line, report the value as "5742".
DOLLARS	Dollar (i.e., debt/loan amount) value that meets the scope of the line.	If $800,457.00 meets the criteria for this line, report the value as "800457.00".
GA_CODE	3-digit GA Code	Report "999".
FISCAL_YEAR	4-digit FY	Report "2020".
FISCAL_MONTH	2-digit fiscal month	Report "06".

Line 2 should display as follows:

```
1-30_DAYS_DELINQUENT,5742,800457.00,999,2020,06
```

Note About Lines 2–13

The sum of the total Dollars value of Lines 2–13 must equal the Dollars value reported on MR-32 of the GAFR. If a GA submits this Data Set and the total of these lines does not equal MR-32, FSA will reject the GA's submission and return it for correction.

5.6 File Naming

The GAs should use the following file naming configuration.

Table 5.6 Aging Data File Naming Configuration

Required File Naming Configuration	Example
yyyymm-AGNG-ccc *Where* • "yyyy" = 4-digit fiscal reporting year • "mm" = 2-digit fiscal reporting month • "AGNG" = data set short name • "ccc" = 3-digit GA code	GA 999 will name the CSV for Aging Data as of March 31, 2023 as follows: • 202306-AGNG-999.csv

5.7 Presentation

If the Aging Data Set is prepared correctly, when uploaded to MS Excel or MS Access, the data will display as shown:

	A	B	C	D	E	F
1	AGING_CATEGORY	NUMBER	DOLLARS	GA_CODE	FISCAL_YEAR	FISCAL_MONTH
2	1-30_DAYS DELINQUENT	5742	800457	999	2020	6
3	31-60_DAYS DELINQUENT	1294	107523.11	999	2020	6
4	61-90_DAYS DELINQUENT	1251	95689.77	999	2020	6
5	91-120_DAYS DELINQUENT	725	387179.73	999	2020	6
6	121-150_DAYS DELINQUENT	1757	1261356.11	999	2020	6
7	151-180_DAYS DELINQUENT	1596	1039900.89	999	2020	6
8	181-270_DAYS DELINQUENT	789	9001862.55	999	2020	6
9	271-365_DAYS DELINQUENT	238	1206899.14	999	2020	6
10	1-2_YEARS DELINQUENT	71	1176864.19	999	2020	6
11	2-6_YEARS DELINQUENT	56	350698.04	999	2020	6
12	6-10_YEARS DELINQUENT	14	22449.11	999	2020	6
13	OVER_10_YEARS DELINQUENT	8	282852.65	999	2020	6

Note About Abnormal Balances

The expected sign for all debt quantities and dollar amounts for this Data Set is positive. Any abnormal balances must be researched and explained. The explanation can be included in the body of the submission email or added as a separate MS Word file attachment. See Section 7.0 Submission to FSA for more information.

6.0 MR-32 & MR-41 Loan Ending Balance Disposition Data Set

6.1 Purpose

The MR-32 & MR-41 Loan Ending Balance Disposition Data Set (Disposition Data) is needed to monitor GA compliance with DCIA TOP Referral reporting.

6.2 Scope

The scope of the data is debt reported on GAFR lines MR-32 Ending Balance of Defaulted Loans and MR-41 Ending Balance on Bankruptcies as of the fiscal month-end.

6.3 Frequency

Each GA must prepare the Disposition Data as of each fiscal month-end for which it also prepares a GAFR report (i.e., monthly).

6.4 Overview of Data Set Requirement

The Disposition Data captures the combined debt quantities and loan ending balances from the GA's system of record that correspond to the balances the GA reported on GAFR lines MR-32 and MR-41 as of the same month-end. It summarizes and reports amounts according to the disposition of these debts in the most recent (weekly) TOP referral process executed by the GA before month-end (TOP Referral Process Disposition) and further classifies them by Delinquency Group.

The Disposition Data is reported to FSA via the following ten Data Elements:

Line Name

1. Line prefix
2. Line suffix
3. BizOps number
4. Line short name
5. Delinquency group

Portfolio Data

6. Number
7. Dollars

Identifier Data

8. GA code
9. Fiscal year
10. Fiscal month

Each debt is mapped to the Disposition Data based on its TOP Referral Process Disposition as identified by the most recent (weekly) TOP referral process executed prior to month-end for the reporting period and is reported on one line only. Data Elements 1–4 collectively identify each

unique TOP Referral Process Disposition reportable as of month-end, while Data Element 5 further classifies the identified debt quantities and dollar amounts into one of three delinquency groups (1-120 days delinquent, 121-180 days, or > 180 days delinquent) using the DCIA Aging methodology described in Section 2.0 of this document. As a result, each TOP Referral Process Disposition is mapped to three consecutive lines ordered by delinquency group. The unique set of values on each line in Data Elements 1–5 comprise the Line Name and provide the reporting scope criteria for the Portfolio Data elements NUMBER and DOLLARS as of the reporting date.

The ten Data Elements that make up the Disposition Data have the following definitions:

<table>
<tr><th>Data Element</th><th>Data Element Name</th><th>Data Element Definition</th></tr>
<tr><td>1</td><td>LINE_PREFIX</td><td>1-character code (“a” through “i”) assigned by FSA to group reported portfolio data into one of nine categories as follows:
<table>
<tr><th>Value</th><th>Definition</th><th>Purpose</th></tr>
<tr><td>a</td><td>Certified AND Active</td><td rowspan="8">Identifies the disposition of debts (within scope as of the reporting date) in the most recent (weekly) GA TOP Referral Process.</td></tr>
<tr><td>b</td><td>Not Subject to TOP</td></tr>
<tr><td>c</td><td>Due Process Pending Completion</td></tr>
<tr><td>d</td><td>Excluded/Inactivated via DCIA Compliant Exclusion</td></tr>
<tr><td>e</td><td>Excluded/Inactivated via FSA business rule exception</td></tr>
<tr><td>f</td><td>Debt Rejected by Treasury and temporarily excluded</td></tr>
<tr><td>g</td><td>Debt excluded via FSA Temporary Generic Hold[11]</td></tr>
<tr><td>h</td><td>Debt excluded via FSA’s Unenforceable Debt Discharge business process[12]</td></tr>
<tr><td>i</td><td>Debt not referred/inactivated that did not meet the requirements to report in any prior category</td><td>Identifies debts within scope as of the reporting date, not previously reported.</td></tr>
</table></td></tr>
</table>

[11] Category not applicable to GAs

[12] This policy exemption is tracked as a separate category in DMCS; in the GA Disposition Data it is included in section “e” with all the other identified TOP referral business rule exemptions.

Data Element	Data Element Name	Data Element Definition
2	LINE_SUFFIX	3-digit code (“000”–“999”)[13] assigned by FSA to identify the reporting sequence of each reporting line short name within each “LINE_PREFIX” report category.
3	BIZOPS_NO	3-digit code (“001”–“999” or “N/A” (Not Applicable)) assigned by FSA to identify the TOP Referral Exclusion/ Exception/Instruction business rule and definition per Appendix C that defines the debt to be reported on the line, based on debt’s disposition in the most recent weekly TOP referral. Appendix C maps each FSA TOP Referral business rule to the corresponding Disposition Data line number. Leading zeros are added to the FSA TOP Referral BizOps Number to produce the corresponding three-digit BIZOPS_NO code. E.g., “1” becomes “001”, “10” becomes “010”, etc. If debt was not excluded from TOP referral based on an FSA business rule (e.g., because debt WAS referred, or debt was not in portfolio at time of last TOP referral, etc.) then no business rule is applicable and “N/A” is entered in this field.
4	LINE_SHORT_NAME	Text required by FSA that briefly describes the disposition post-TOP referral of debt to be reported on the line.

[13] The Disposition Data Set format is designed to facilitate FSA’s consolidation of data received from GAs and DMCS into one data set for analysis. The DMCS-only reporting categories in the Data Elements BIZOPS_NO, LINE_PREFIX, and LINE_SUFFIX have been omitted, resulting in gaps in the sequence numbers

<table>
<tr><th>Data Element</th><th>Data Element Name</th><th>Data Element Definition</th></tr>
<tr><td>5</td><td>DELINQUENCY_GROUP</td><td>One of three delinquency categories that describe, as of the reporting month-end date, the number of days the debt reported on the line is delinquent, per DCIA-compliant aging (as described in Section 2.0 of this document).

<table><tr><th>Permitted value</th><th>Definition</th></tr><tr><td>1–120_DAYS</td><td>At least one*, but no more than 120 days delinquent</td></tr><tr><td>121–180_DAYS</td><td>At least 121, but no more than 180 days delinquent</td></tr><tr><td>OVER_180_DAYS</td><td>More than 180 days delinquent</td></tr></table>
*If a debt is acquired via a FFEL default claim on the month-end reporting date, then its calculated age will be zero days delinquent. However, since ALL debts acquired via a default claim are considered delinquent from the moment of acquisition, such debts must be reported in the “1-120_DAYS” delinquency group.

Note: The aging methodology used for the Disposition Data is identical to that used for the Aging Data, except that for the Disposition Data all debts are aggregated into one of only three delinquency groups.</td></tr>
<tr><td>6</td><td>NUMBER</td><td>Number (i.e., quantity of debts) that meets the scope of the line as defined by the Line Name, as of the reporting date.</td></tr>
<tr><td>7</td><td>DOLLARS</td><td>Dollar (i.e., debt/loan amount) value that meets the scope of the line as defined by the Line Name.</td></tr>
<tr><td>8</td><td>GA_CODE</td><td>3-digit GA Code</td></tr>
<tr><td>9</td><td>FISCAL_YEAR</td><td>4-digit FY</td></tr>
<tr><td>10</td><td>FISCAL_MONTH</td><td>2-digit fiscal month</td></tr>
</table>

6.5 Data Set Requirements

Line 1 - Data Element Names

Report the ten required Data Element Names as shown in the table below.

Data Element	Data Element Name
1	LINE_PREFIX
2	LINE_SUFFIX
3	BIZOPS_NO
4	LINE_SHORT_NAME
5	DELINQUENCY_GROUP
6	NUMBER
7	DOLLARS
8	GA_CODE
9	FISCAL_YEAR
10	FISCAL_MONTH

Line 1 should display as follows:

```
LINE_PREFIX,LINE_SUFFIX,BIZOPS_NO,LINE_SHORT_NAME,DELINQUENCY_GROUP,NUMBER,DOLLARS,GA_CODE,FISCAL_YEAR,FISCAL_MONTH
```

For the Disposition Data lines 2–124, the Identifier Data elements will have identical values on every line for each GA in any given reporting period. If GA 999 prepared Disposition Data as of March 31, 2023, it would report the following values on every line:

Identifier Data Element	Criteria	Example
GA_CODE	3-digit GA Code	Report “999”.
FISCAL_YEAR	4-digit FY	Report “2023”.
FISCAL_MONTH	2-digit FY month	Report “06”.

Therefore, the remainder of this section omits the above-mentioned Data Elements from the tables presented.

Note About the Disposition Data Line Name Values

The Disposition Data format is designed to facilitate FSA's consolidation of data received from GAs and DMCS into one data set for analysis. The DMCS-only reporting categories for the Data Elements BIZOPS_NO, LINE_PREFIX, and LINE_SUFFIX, have been omitted, resulting in gaps in the sequence numbers.

Lines 2–4: Debt Certified and Active

Report on each line (as Number and Dollars respectively) the combined debt quantities and loan ending balances from the GA's system of record that correspond to the balances the GA reported on GAFR lines MR-32 and MR-41 as of the month-end reporting date that, based on the most recent weekly TOP Referral prior to the reporting month-end, have a TOP Referral Process Disposition "Debt Certified and Active" AND meet the line's DELINQUENCY_GROUP criteria. If GA 999 identified the following debt:

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Certified and Active"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
2	a	10	N/A	Debts Certified and Active	1-120 _DAYS	207	55,700.56
3	a	10	N/A	Debts Certified and Active	121-180 _DAYS	3,008	1,815,062.46
4	a	10	N/A	Debts Certified and Active	OVER_180 _DAYS	1,012	9,999,950.12

Based on the criteria above, the sample Lines 2–4 would display as follows:

```
a,10,N/A,Debts Certified and Active,1-120_DAYS,207,55700.56,999,2020,6
a,10,N/A,Debts Certified and Active,121-180_DAYS,3008,1815062.46,999,2020,6
a,10,N/A,Debts Certified and Active,OVER_180_DAYS,1012,9999950.12,999,2020,6
```

Lines 5–118: Debt Not Certified/Inactivated Based on TOP Referral Business Rule

Report on each line (as Number and Dollars respectively) the combined debt quantities and loan ending balances from the GA's system of record that correspond to the balances the GA reported on GAFR lines MR-32 and MR-41 as of the month-end reporting date for any debts NOT "Certified and Active" (or, if previously certified, inactivated) because, based on the most recent weekly TOP Referral prior to the reporting month-end, they have a TOP Referral Process Disposition that meets the requirements of the FSA TOP Referral business rule in Appendix C that maps to the line's required BIZOPS_NO value AND meet the line's DELINQUENCY_GROUP criteria. If GA 999 identified the following debt:

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
5	b	10	1	Zero Balance (Closed) Debts	1-120 _DAYS	2	-
6	b	10	1	Zero Balance (Closed) Debts	121-180 _DAYS	-	-
7	b	10	1	Zero Balance (Closed) Debts	OVER_180 _DAYS	-	-
8	b	20	53	Credit Balance Debts	1-120 _DAYS	3	(2,000.22)
9	b	20	53	Credit Balance Debts	121-180 _DAYS	-	-
10	b	20	53	Credit Balance Debts	OVER_180 _DAYS	-	-
11	b	30	2	Debts 0-120 days delinquent per 65DN Agreement	1-120 _DAYS	8,115	805,847.47
12	b	30	2	Debts 0-120 days delinquent per 65DN Agreement	121-180 _DAYS	-	-
13	b	30	2	Debts 0-120 days delinquent per 65DN Agreement	OVER_180 _DAYS	-	-
14	c	10	24	Due process not initiated (Awaiting Treasury Address)	1-120 _DAYS	-	-

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
15	c	10	24	Due process not initiated (Awaiting Treasury Address)	121-180 _DAYS	3	6,000.00
16	c	10	24	Due process not initiated (Awaiting Treasury Address)	OVER_180 _DAYS	9	68,043.06
17	c	20	23	Due process not initiated (deliverable)	1-120 _DAYS	-	-
18	c	20	23	Due process not initiated (deliverable)	121-180 _DAYS	4	11,300.14
19	c	20	23	Due process not initiated (deliverable)	OVER_180 _DAYS	1	2,600.00
20	c	30	22	In due process, period not expired	1-120 _DAYS	-	-
21	c	30	22	In due process, period not expired	121-180 _DAYS	2	4,000.00
22	c	30	22	In due process, period not expired	OVER_180 _DAYS	2	54,000.17
23	d	10	3	Debt balance >$0 but < $25	1-120 _DAYS	-	-
24	d	10	3	Debt balance >$0 but < $25	121-180 _DAYS	52	100.00
25	d	10	3	Debt balance >$0 but < $25	OVER_180 _DAYS	15	100.00
26	d	20	4	Pseudo-SSN (Begins with 9)	1-120 _DAYS	-	-
27	d	20	4	Pseudo-SSN (Begins with 9)	121-180 _DAYS	1	2,000.00

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
28	d	20	4	Pseudo-SSN (Begins with 9)	OVER_180 _DAYS	1	2,000.00
29	d	30	5	Request for Formal Review/Document ation	1-120 _DAYS	-	-
30	d	30	5	Request for Formal Review/Document ation	121-180 _DAYS	2	1,500.00
31	d	30	5	Request for Formal Review/Document ation	OVER_180 _DAYS	2	1,500.00
32	d	40	6	Pending Discharge - Death (non-grant)	1-120 _DAYS	-	-
33	d	40	6	Pending Discharge - Death (non-grant)	121-180 _DAYS	3	6,203.00
34	d	40	6	Pending Discharge - Death (non-grant)	OVER_180 _DAYS	3	106,203.18
35	d	50	7	Pending Discharge - Disability (TPD) (non-grant)	1-120 _DAYS	-	-
36	d	50	7	Pending Discharge - Disability (TPD) (non-grant)	121-180 _DAYS	5	17,001.42
37	d	50	7	Pending Discharge - Disability (TPD) (non-grant)	OVER_180 _DAYS	5	9,500.00

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
38	d	60	8	Pending Discharge - Closed School (non-grant)	1-120 _DAYS	-	-
39	d	60	8	Pending Discharge - Closed School (non-grant)	121-180 _DAYS	3	5,100.00
40	d	60	8	Pending Discharge - Closed School (non-grant)	OVER_180 _DAYS	3	5,100.00
41	d	70	9	Pending Discharge - False Certification (FFEL, FISL, DL)	1-120 _DAYS	-	-
42	d	70	9	Pending Discharge - False Certification (FFEL, FISL, DL)	121-180 _DAYS	1	10,003.17
43	d	70	9	Pending Discharge - False Certification (FFEL, FISL, DL)	OVER_180 _DAYS	1	52,003.98
44	d	80	10	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	1-120 _DAYS	-	-
45	d	80	10	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	121-180 _DAYS	2	4,000.00

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
46	d	80	10	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	OVER_180 _DAYS	2	4,000.00
47	d	100	12	Pending Discharge - ID Theft (FFEL, FISL, DL)	1-120 _DAYS	-	-
48	d	100	12	Pending Discharge - ID Theft (FFEL, FISL, DL)	121-180 _DAYS	1	2,055.00
49	d	100	12	Pending Discharge - ID Theft (FFEL, FISL, DL)	OVER_180 _DAYS	1	2,055.00
50	d	110	13	Bankruptcy Exclusion	1-120 _DAYS	-	-
51	d	110	13	Bankruptcy Exclusion	121-180 _DAYS	100	20,000.00
52	d	110	13	Bankruptcy Exclusion	OVER_180 _DAYS	599	492,500.83
53	d	120	14	Military Exclusion	1-120 _DAYS	-	-
54	d	120	14	Military Exclusion	121-180 _DAYS	7	14,000.00
55	d	120	14	Military Exclusion	OVER_180 _DAYS	7	14,000.00
56	d	130	16	Adversary Proceeding Exclusion	1-120 _DAYS	-	-
57	d	130	16	Adversary Proceeding Exclusion	121-180 _DAYS	53	201,000.99

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
58	d	130	16	Adversary Proceeding Exclusion	OVER_180 _DAYS	5	701,000.36
59	d	150	18	Formal Appeals	1-120 _DAYS	-	-
60	d	150	18	Formal Appeals	121-180 _DAYS	20	48,153.13
61	d	150	18	Formal Appeals	OVER_180 _DAYS	15	40,000.00
62	d	160	19	SSA Disabled Match (non-grant)	1-120 _DAYS	-	-
63	d	160	19	SSA Disabled Match (non-grant)	121-180 _DAYS	3	6,233.00
64	d	160	19	SSA Disabled Match (non-grant)	OVER_180 _DAYS	3	6,233.00
65	d	170	20	FEMA Disaster Area	1-120 _DAYS	-	-
66	d	170	20	FEMA Disaster Area	121-180 _DAYS	2	5,090.00
67	d	170	20	FEMA Disaster Area	OVER_180 _DAYS	2	5,090.00
68	d	190	25	PIF via AWG	1-120 _DAYS	-	-
69	d	190	25	PIF via AWG	121-180 _DAYS	2	5,901.00
70	d	190	25	PIF via AWG	OVER_180 _DAYS	2	5,901.00
71	d	200	27	Post 65DN Rehab (5 on-time payments)	1-120 _DAYS	-	-
72	d	200	27	Post 65DN Rehab (5 on-time payments)	121-180 _DAYS	16	8,000.00

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
73	d	200	27	Post 65DN Rehab (5 on-time payments)	OVER_180 _DAYS	11	8,000.00
74	d	210	36	Pending Consolidation	1-120 _DAYS	-	-
75	d	210	36	Pending Consolidation	121-180 _DAYS	5	49,919.00
76	d	210	36	Pending Consolidation	OVER_180 _DAYS	5	11,000.00
77	d	220	45	Restitution Debts (bRestitn)	1-120 _DAYS	-	-
78	d	220	45	Restitution Debts (bRestitn)	121-180 _DAYS	1	2,650.00
79	d	220	45	Restitution Debts (bRestitn)	OVER_180 _DAYS	1	2,650.00
80	d	230	48	VA Disabled Match (non-grant)	1-120 _DAYS	-	-
81	d	230	48	VA Disabled Match (non-grant)	121-180 _DAYS	1	2,220.00
82	d	230	48	VA Disabled Match (non-grant)	OVER_180 _DAYS	1	2,220.00
83	d	240	47	Hardship	1-120 _DAYS	-	-
84	d	240	47	Hardship	121-180 _DAYS	11	7,500.15
85	d	240	47	Hardship	OVER_180 _DAYS	1	3,500.00
86	d	250	50	Court-Ordered Settlement	1-120 _DAYS	-	-
87	d	250	50	Court-Ordered Settlement	121-180 _DAYS	1	2,100.00
88	d	250	50	Court-Ordered Settlement	OVER_180 _DAYS	32	2,100.00

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
89	d	260	51	Litigation Hold	1-120 _DAYS	-	-
90	d	260	51	Litigation Hold	121-180 _DAYS	1	3,500.00
91	d	260	51	Litigation Hold	OVER_180 _DAYS	1	73,598.44
92	e	10	26	SSN Change	1-120 _DAYS	-	-
93	e	10	26	SSN Change	121-180 _DAYS	1	1,950.00
94	e	10	26	SSN Change	OVER_180 _DAYS	1	1,950.00
95	e	70	33	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	1-120 _DAYS	-	-
96	e	70	33	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	121-180 _DAYS	1	3,750.00
97	e	70	33	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	OVER_180 _DAYS	1	3,750.00
98	e	100	40	Borrower Defense (FFEL, Perkins)	1-120 _DAYS	-	-
99	e	100	40	Borrower Defense (FFEL, Perkins)	121-180 _DAYS	1	2,670.00
100	e	100	40	Borrower Defense (FFEL, Perkins)	OVER_180 _DAYS	1	9,541.60
101	e	120	15	Unenforceable Debt Discharge Process	1-120 _DAYS	-	-

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
102	e	120	15	Unenforceable Debt Discharge Process	121-180 _DAYS	2	4,259.00
103	e	120	15	Unenforceable Debt Discharge Process	OVER_180 _DAYS	1	2,000.00
104	e	130	46	Pending Subrogation	1-120 _DAYS	-	-
105	e	130	46	Pending Subrogation	121-180 _DAYS	20	18,000.54
106	e	130	46	Pending Subrogation	OVER_180 _DAYS	5	812,000.77
107	e	140	44	Mixed (Debit/Credit) Balance Debts	1-120 _DAYS	-	-
108	e	140	44	Mixed (Debit/Credit) Balance Debts	121-180 _DAYS	1	4,500.00
109	e	140	44	Mixed (Debit/Credit) Balance Debts	OVER_180 _DAYS	1	4,500.00
110	e	150	52	Closed debt with debit balance	1-120 _DAYS	-	-
111	e	150	52	Closed debt with debit balance	121-180 _DAYS	1	1,900.00
112	e	150	52	Closed debt with debit balance	OVER_180 _DAYS	1	1,900.00
113	e	160	54	Unrelated EIN matches borrower SSN	1-120 _DAYS	-	-
114	e	160	54	Unrelated EIN matches borrower SSN	121-180 _DAYS	1	1,000.00

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Certified/Inactivated Based on TOP Referral Business Rule"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
115	e	160	54	Unrelated EIN matches borrower SSN	OVER_180 _DAYS	1	1,000.00
116	f	10	38	Treasury Reject	1-120 _DAYS	103	55,800.96
117	f	10	38	Treasury Reject	121-180 _DAYS	15	2,635.00
118	f	10	38	Treasury Reject	OVER_180 _DAYS	1	2,635.00

Based on the criteria above, sample Lines 5–10 would display as follows:

```
b,10,1,Zero Balance (Closed) Debts,1-120_DAYS,2,0,999,2020,6
b,10,1,Zero Balance (Closed) Debts,121-180_DAYS,0,0,999,2020,6
b,10,1,Zero Balance (Closed) Debts,OVER_180_DAYS,0,0,999,2020,6
b,20,53,Credit Balance Debts,1-120_DAYS,3,-2000.22,999,2020,6
b,20,53,Credit Balance Debts,121-180_DAYS,0,0,999,2020,6
b,20,53,Credit Balance Debts,OVER_180_DAYS,0,0,999,2020,6
```

Note About Disposition Data Lines 8, 9 and 10

Disposition Data Lines 8, 9 and 10 report debts with a credit balance. Enter the debt quantity (NUMBER) as a positive number but the amount (DOLLAR) as a negative amount. These are the only data lines where a negative dollar amount will be reported, unless the net amount meeting the reporting criteria for any other line is abnormal.

Lines 119–121: Debt Not Tested

Report on each line (as Number and Dollar respectively) the combined debt quantities and loan ending balances from the GA's system of record that correspond to the balances the GA reported on GAFR lines MR-32 and MR-41 as of the month-end reporting date for debts that were not tested for TOP Referral Disposition because they were not in scope at the time of the last (weekly) TOP referral before month-end AND also meet the line's DELINQUENCY_GROUP criteria. If GA 999 identified the following debt:

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Tested"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
119	i	5	N/A	Debt not in portfolio at time of last TOP referral	1-120 _DAYS	3	3,000.01
120	i	5	N/A	Debt not in portfolio at time of last TOP referral	121-180 _DAYS	-	-
121	i	5	N/A	Debt not in portfolio at time of last TOP referral	OVER_18 0 _DAYS	-	-

Based on the criteria above, sample Lines 119–121 would display as follows:

```
i,5,N/A,Debt not in portfolio at time of last TOP referral,1-120_DAYS,3,3000.01,999,2020,6
i,5,N/A,Debt not in portfolio at time of last TOP referral,121-180_DAYS,0,0,999,2020,6
i,5,N/A,Debt not in portfolio at time of last TOP referral,OVER_180_DAYS,0,0,999,2020,6
```

Lines 122–124: Debt Not Otherwise Classified

Report on each line (as Number and Dollar respectively) the combined debt quantities and loan ending balances from the GA's system of record that correspond to the balances the GA reported on GAFR lines MR-32 and MR-41 as of the month-end reporting date for debts that did not meet the reporting criteria for any prior line (i.e., Lines 2–121) AND also meet the line's DELINQUENCY_GROUP criteria. If GA 999 identified the following debt:

Line	Debt in Scope on Reporting Date with TOP Referral Process Disposition: "Debt Not Otherwise Classified"						
	Line Name					Portfolio Data	
	LINE_ PREFIX	LINE_ SUFFIX	BIZOPS _NO	LINE_ SHORT_NAME	DELINQ-UENCY_ GROUP	NUMBER	DOLLAR
122	i	10	N/A	Debt does not meet definition for any prior report line	1-120 _DAYS	-	-
123	i	10	N/A	Debt does not meet definition for any prior report line	121-180 _DAYS	-	-
124	i	10	N/A	Debt does not meet definition for any prior report line	OVER_180 _DAYS	-	-

Based on the criteria above, sample lines 122–124 would display as follows:

```
i,10,N/A,Debt does not meet definition for any prior report line,1-120_DAYS,0,0,999,2020,6
i,10,N/A,Debt does not meet definition for any prior report line,121-180_DAYS,0,0,999,2020,6
i,10,N/A,Debt does not meet definition for any prior report line,OVER_180_DAYS,0,0,999,2020,6
```

Note About Disposition Data Lines 122–124 Debt Not Otherwise Classified

Since the TOP referral process is designed to identify the appropriate disposition of every debt within the GA portfolio that meets the scope definition on the date the TOP referral process is executed, no dollar amount or debt quantity is expected to be reported on these lines. Any valid dollar amount and debt quantity reported represents either debt that was incorrectly mapped or debt with characteristics that the referral or reporting process did not identify. The GA must fully research any such debt quantity or dollar amount reported and provide a detailed written explanation when the Disposition Data Set is submitted, either included in the body of the submission email or attached as a separate MS Word file.

6.6 Data Validation

Note About Validation of Data Before Submission

It is FSA's expectation that GAs will carefully review the Disposition Data Set each month prior to submission to ensure on-going compliance with the Disposition Data requirements. The review should include, but is not limited to, the following Data Validation Tests.

FSA will reject the Disposition Data submitted if it does not comply with requirements or if a required explanation is not provided.

Validation Test 1 – Validate Number of Disposition Data Lines Against Requirement

The Disposition Data Requirements detailed in Section 6.5 above explicitly require that each GA submit Disposition Data that includes 124 lines (including the Data Element Names in Line 1). FSA will reject the Disposition Data if the total number of lines is not equal to 124.

Note About Disposition Data Validation Test 1

Validation Test 1 serves as a control for the Disposition Data and must result in a calculated line number variance of zero. If a GA submits Disposition Data where this test results in a variance other than zero, FSA will reject the GA's submission and return it for correction.

Validation Test 2 – Validate Disposition Data Against Control Total

The Disposition Data requirements described in Section 6.5 above are designed to capture the combined debt quantities and loan ending balances from the GA's system of record that correspond to the balances the GA reported on GAFR lines MR-32 and MR-41 as of the month-end reporting date. FSA will validate the Disposition Data submitted by each GA against the sum of the MR-32 and MR-41 GAFR lines the GA submitted for the same reporting period. For example, assume GA 999 submitted a GAFR and Disposition Data with the following data as of March 31, 2023:

Validation - Debt in Scope on Reporting Date	
Data Source	**Dollar Amount**
GAFR Line MR–32	15,169,908.06
GAFR Line MR–41	563,824.23
Subtotal: Disposition Data Control Total	**15,733,732.29**
Total Dollar amount reported in Disposition Data Element "Dollars", Lines 2–124	15,733,732.29
Control Difference:	**0.00**

Since the Control Difference is zero, the Disposition Data would PASS Validation Test

Note About Disposition Data Validation Test 2

Validation Test 2 serves as a control for the Disposition Data and must result in a calculated Control Difference value of zero. If a GA submits Disposition Data where this test results in a Control Difference value other than zero, FSA will reject the GA's submission and return it for correction.

6.7 Naming Configuration

The GAs should use the following file naming configuration.

Table 6.7 Disposition Data File Naming Configuration

Required File Naming Configuration	Example
yyyymm- DISP-ccc *Where* • "yyyy" = 4-digit fiscal reporting year • "mm" = 2-digit fiscal reporting month • "DISP" = data set short name • "ccc" = 3-digit GA code	GA 999 will name the Disposition Data as of March 31, 2023 as follows: • 202306-DISP-999.csv

6.8 Presentation

If the Disposition Data Set is prepared correctly, when uploaded to MS Excel or MS Access, the data will display as shown:

	A	B	C	D	E	F	G	H	I	J
1	LINE_PREFIX	LINE_SUFFIX	BIZOPS_NO	LINE_SHORT_NAME	DELINQUENCY_GROUP	NUMBER	DOLLARS	GA_CODE	FISCAL_YEAR	FISCAL_MONTH
2	a	10	N/A	Debts Certified and Active	1-120_DAYS	207	55700.56	999	2020	6
3	a	10	N/A	Debts Certified and Active	121-180_DAYS	3008	1815062.46	999	2020	6
4	a	10	N/A	Debts Certified and Active	OVER_180_DAYS	1012	9999950.12	999	2020	6
5	b	10	1	Zero Balance (Closed) Debts	1-120_DAYS	2	0	999	2020	6
6	b	10	1	Zero Balance (Closed) Debts	121-180_DAYS	0	0	999	2020	6

The above image shows only the first few lines of the Disposition Data. For a complete example, please refer to Appendix B.

Note About Abnormal Balances

Except for Lines 8–10, the expected sign for all debt quantities and dollar amounts in this Data Set is positive. Any abnormal balances must be researched and explained. The explanation can be included in the body of the submission email or added as a separate MS Word file attachment. See Section 7.0 Submission to FSA for more information.

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7.0 Submission to FSA

Note About Validation of Data Before Submission

To ensure on-going compliance with the DCIA Compliance Data Set requirements, FSA will perform a quality control review of the GA's submission package for each reporting period. This review will include confirming that the GA's submission agrees with the related GAFR MR lines and that variance explanations have been provided when required. FSA will reject the submission if it does not reconcile to the highlighted MR lines or if a required explanation is not provided. GAs must therefore review their submissions carefully prior to delivery.

7.1 Contents of the DCIA Compliance Data Set Submission

GAs can prepare the DCIA Compliance Data Set in Excel; however, the files must be saved and submitted to FSA as individual CSV files. For example, if a GA submits a GAFR for a reporting period that has FFEL Program activity or balances, then the GA must also submit separate CSV files - one for each of the required Data Sets.

GAs must submit the following as appropriate:

- The applicable individual Data Set files,
- The Disposition Data explanation (i.e., for "Debt Not Otherwise Classified"), if necessary,
- The required Write-Off Data explanation, if necessary and
- Any abnormal activity or balance explanations, if necessary.

Explanations can be included in the body of the submission email or added as a separate MS Word file attachment. Additionally, submitted files should not be password protected unless required by the GA's or FSA's data protection policies (i.e., because the files contain personally identifiable information or sensitive data).

7.2 Delivery Instructions

GAs should prepare an email with the contents of the submission package attached and send it to the following FSA email addresses:

To: FSAFinancePortfolio@ed.gov

CC: callis.carleton@ed.gov

Please indicate the reporting month and FY in the subject line of the email as follows:

Table 7.2 Submission Email Subject Line

Subject Line	Example
DCIA Compliance Data Set mm–yyyy Where • "mm" = 2-digit fiscal reporting month • "yyyy" = 4-digit fiscal reporting year	For the reporting period ending March 31, 2023, the subject line should be as follows: • DCIA Compliance Data Set 06-2023

7.3 Due Date

GAs must submit the DCIA Compliance Data Set no later than close of business (COB) on the due date specified below.

Table 7.3 DCIA Compliance Data Set Due Dates

FY Reporting Period End Date	Applicable to the Following Months	Due Date	Number of Data Sets Required to Be Submitted
If month-end…	Oct, Nov, Jan, Feb, April, May, Jul, and Aug	COB 12th business day of the following month.	2 Data Sets*
If quarter-end…	Mar	COB 8th business day of the following month.	3 Data Sets**
If quarter-end…	Dec, Jun, and Sep	COB 8th business day of the following month.	2 Data Sets*

** Write-Off Data Set isn't required*
*** Write-Off Data Set is required*

Business day is based upon the Federal government calendar. COB is 5 p.m. Eastern time.

Appendixes

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Appendix A – Sample GAFR / ED Form 2000

Appendix A – Sample GAFR / ED Form 2000

Note: The sample GAFR presented below is for example purposes only. Its purpose is to highlight the relationship between specific GAFR MR lines and the DCIA Compliance Data Set.

Department of Education - Student Financial Assistance Report Date:
SFA FFEL GA Monthly Financial Detail Report Page: 1 of 1

GA Code: Status: Accepted For Fiscal Month of: 12/2017
GA Name:
ED Comments:
GA Comments:

Item No.	Category Detail	Amount DueTo/(From)	Principal	Interest Amount	Other Amount
MR-1	Claims Paid	4,873,535.92			
MR-1-A	Defaults-Net		4,837,928.02		4,837,928.02
MR-1-B	Exempt/Lender of Last Resort		.00		
MR-1-C	Death/Disability		19,001.72		
MR-1-D	Closed School/False Certificate		.00		
MR-1-E	Bankruptcy		.00		
MR-1-F	Unpaid Refunds		.00		
MR-1-G	Discharges		16,606.18		
MR-2	Borrower Payment Return	.00	.00	.00	.00
MR-3	Status Changes	1,212.47			
MR-3-A	Death/Disability		1,052.66	159.81	
MR-3-B	Closed School/False Certificate		.00	.00	
MR-3-C	Bankruptcy		.00	.00	
MR-4	TOP Overpayments	.00	.00	.00	.00
MR-5	Repurchases - CFY	72,481.12			
MR-5-A	Defaults		72,481.12	.00	.00
MR-5-B	Exempt/Lender of Last Resort		.00		.00
MR-5-C	Death/Disability		.00		.00
MR-5-D	Closed School/False Certificate		.00		.00
MR-5-E	Bankruptcy		.00		.00
MR-6	Repurchases - PFY	.00			
MR-6-A	Defaults		.00	.00	.00
MR-6-B	Exempt/Lender of Last Resort		.00		.00
MR-6-C	Death/Disability		.00		.00
MR-6-D	Closed School/False Certificate		.00		.00
MR-6-E	Bankruptcy		.00		.00
MR-7	Partial Refunds - CFY	1,760.54			
MR-7-A	Defaults		578.18		
MR-7-B	Exempt/Lender of Last Resort		.00		
MR-7-C	Death/Disability		1,182.36		
MR-7-D	Closed School/False Certificate		.00		
MR-7-E	Bankruptcy		.00		

MR-8	Partial Refunds - PFY	.00			
MR-8-A	Defaults		.00		
MR-8-B	Exempt/Lender of Last Resort		.00		
MR-8-C	Death/Disability		.00		
MR-8-D	Closed School/False Certificate		.00		
MR-8-E	Bankruptcy		.00		
MR-9	Overstated Claims	.00			
MR-9-A	Defaults		.00		
MR-9-B	Exempt/Lender of Last Resort		.00		
MR-9-C	Death/Disability		.00		
MR-9-D	Closed School/False Certificate		.00		
MR-9-E	Bankruptcy		.00		
MR-10	Rehabilitated Loan Refund	397,717.23	397,717.23		
MR-10A	Rehabilitated Loans		.00	44,741.42	73,539.10
MR-11	FFEL Consolidated - Refund	.00	.00	.00	.00
MR-11-A	FFEL Consolidated - Payoff		.00	.00	.00
MR-11-B	FFEL Consolidated - GA Retention		.00	.00	.00
MR-12	GA Administrative Wage Garnishment	79,766.62	39,558.78	24,616.12	15,591.72
MR-12-A	Administrative Wage Garnishment		49,230.26	30,741.10	19,431.16
MR-12-B	Administrative Wage Garnishment		7,876.84	4,918.58	3,108.99
MR-13	Default Collections	30,149.19	20,116.76	5,937.05	4,095.38
MR-13-A	Default Collections - Total Collection		25,379.80	7,356.30	5,134.46
MR-13-B	Default Collections - GA Retention		4,060.77	1,177.01	821.51
MR-14	Bankruptcy Collections	.00	.00	.00	.00
MR-15	Default FFEL Consolidated by DL Fee	13,537.54			
MR-16	Total	4,279,336.15			

Non-Payment Activity
Treasury Offset Program

MR-17	Treasury Offset		.00	.00	.00
MR-18	Non-Federal Share Offset		.00	.00	.00
MR-19	Treasury Offset Reversals		.00	.00	.00

Status Changes - Account Balance at Conversion				
MR-20	Default/Lender of Last Resort	234,687.43	3,821.81	5,823.31
MR-21	Default/Lender of Last Resort	.00	.00	.00
MR-22	Default/Lender of Last Resort	.00	.00	.00
MR-23	Bankruptcy to Default/Lender	.00	.00	.00
MR-24	Collection Terminations	1,677.48	.00	.00
MR-25	Compromises	8.22	.00	2,096.95
MR-26	Agency Accruals		200,371.37	293,637.74

Item No.	Category Detail	Principal Amount	Interest Amount	Other Amount
Non-Payment Activity				
Agency Accruals				
MR-27	Default FFEL Consolidated by	154,436.84	7,397.84	29,238.03
MR-28	Subrogated Loans	105,123.63	33,169.40	33,660.38
MR-29	Default Loans Transferred Out	.00	.00	.00
MR-30	Default Loans Transferred In	.00	.00	.00
MR-31	Other Transactions Affecting	.00	.00	.00
MR-32	Ending Balance on Defaulted	48,910,948.93	4,605,154.25	.00
Delinquency by Debt				
MR-33	Not Delinquent	10,590,079.64	884,464.09	
MR-34	1 - 90 days	2,550,010.72	235,615.76	
MR-35	91 - 180 days	1,398,999.32	134,424.53	
MR-36	181 - 365 days	3,614,771.04	223,101.12	
MR-37	1 - 2 years	13,344,776.38	450,706.77	
MR-38	2 - 6 years	14,798,159.74	2,134,119.37	
MR-39	6 - 10 years	2,378,893.38	482,257.50	
MR-40	Over 10 years	235,258.71	60,465.11	
Bankruptcy				
MR-41	Ending Balance on Bankruptcies	.00	.00	.00
MR-42	Bankruptcies Transferred	349,621.74	1,730.15	.00

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Appendix B – Presentation of MR-32 & MR-41 Loan Ending Balance Disposition Data Set in Microsoft Excel Format

MR-32C & MR-41 Loan Ending Balance Disposition Data Set (Disposition Data)

	A	B	C	D	E	F	G	H	I	J
1	LINE_PREFIX	LINE_SUFFIX	BIZOPS_NO	LINE_SHORT_NAME	DELINQUENCY_GROUP	NUMBER	DOLLARS	GA_CODE	FISCAL_YEAR	FISCAL_MONTH
2	a	10	N/A	Debts Certified and Active	1–120_DAYS	207	55700.56	999	2020	6
3	a	10	N/A	Debts Certified and Active	121–180_DAYS	3008	1815062.46	999	2020	6
4	a	10	N/A	Debts Certified and Active	OVER_180_DAYS	1012	9999950.12	999	2020	6
5	b	10	1	Zero Balance (Closed) Debts	1–120_DAYS	2	0	999	2020	6
6	b	10	1	Zero Balance (Closed) Debts	121–180_DAYS	0	0	999	2020	6
7	b	10	1	Zero Balance (Closed) Debts	OVER_180_DAYS	0	0	999	2020	6
8	b	20	53	Credit Balance Debts	1–120_DAYS	3	-2000.22	999	2020	6
9	b	20	53	Credit Balance Debts	121–180_DAYS	0	0	999	2020	6
10	b	20	53	Credit Balance Debts	OVER_180_DAYS	0	0	999	2020	6
11	b	30	2	Debts 0-120 days delinquent per 65DN Agreement	1–120_DAYS	8115	805847.47	999	2020	6
12	b	30	2	Debts 0-120 days delinquent per 65DN Agreement	121–180_DAYS	0	0	999	2020	6
13	b	30	2	Debts 0-120 days delinquent per 65DN Agreement	OVER_180_DAYS	0	0	999	2020	6
14	c	10	24	Due process not initiated (Awaiting Treasury Address)	1–120_DAYS	0	0	999	2020	6
15	c	10	24	Due process not initiated (Awaiting Treasury Address)	121–180_DAYS	3	6000	999	2020	6
16	c	10	24	Due process not initiated (Awaiting Treasury Address)	OVER_180_DAYS	9	68043.06	999	2020	6
17	c	20	23	Due process not initiated (deliverable)	1–120_DAYS	0	0	999	2020	6
18	c	20	23	Due process not initiated (deliverable)	121–180_DAYS	4	11300.14	999	2020	6
19	c	20	23	Due process not initiated (deliverable)	OVER_180_DAYS	1	2600	999	2020	6
20	c	30	22	In due process, period not expired	1–120_DAYS	0	0	999	2020	6
21	c	30	22	In due process, period not expired	121–180_DAYS	2	4000	999	2020	6
22	c	30	22	In due process, period not expired	OVER_180_DAYS	2	54000.17	999	2020	6
23	d	10	3	Debt balance >$0 but < $25	1–120_DAYS	0	0	999	2020	6
24	d	10	3	Debt balance >$0 but < $25	121–180_DAYS	52	100	999	2020	6
25	d	10	3	Debt balance >$0 but < $25	OVER_180_DAYS	15	100	999	2020	6
26	d	20	4	Pseudo-SSN (Begins with 9)	1–120_DAYS	0	0	999	2020	6
27	d	20	4	Pseudo-SSN (Begins with 9)	121–180_DAYS	1	2000	999	2020	6
28	d	20	4	Pseudo-SSN (Begins with 9)	OVER_180_DAYS	1	2000	999	2020	6
29	d	30	5	Request for Formal Review/Documentation	1–120_DAYS	0	0	999	2020	6
30	d	30	5	Request for Formal Review/Documentation	121–180_DAYS	2	1500	999	2020	6
31	d	30	5	Request for Formal Review/Documentation	OVER_180_DAYS	2	1500	999	2020	6
32	d	40	6	Pending Discharge - Death (non-grant)	1–120_DAYS	0	0	999	2020	6
33	d	40	6	Pending Discharge - Death (non-grant)	121–180_DAYS	3	6203	999	2020	6
34	d	40	6	Pending Discharge - Death (non-grant)	OVER_180_DAYS	3	106203.18	999	2020	6
35	d	50	7	Pending Discharge - Disability (TPD) (non-grant)	1–120_DAYS	0	0	999	2020	6
36	d	50	7	Pending Discharge - Disability (TPD) (non-grant)	121–180_DAYS	5	17001.42	999	2020	6
37	d	50	7	Pending Discharge - Disability (TPD) (non-grant)	OVER_180_DAYS	5	9500	999	2020	6
38	d	60	8	Pending Discharge - Closed School (non-grant)	1–120_DAYS	0	0	999	2020	6
39	d	60	8	Pending Discharge - Closed School (non-grant)	121–180_DAYS	3	5100	999	2020	6
40	d	60	8	Pending Discharge - Closed School (non-grant)	OVER_180_DAYS	3	5100	999	2020	6

	A	B	C	D	E	F	G	H	I	J
41	d	70	9	Pending Discharge - False Certification (FFEL, FISL, DL)	1–120_DAYS	0	0	999	2020	6
42	d	70	9	Pending Discharge - False Certification (FFEL, FISL, DL)	121–180_DAYS	1	10003.17	999	2020	6
43	d	70	9	Pending Discharge - False Certification (FFEL, FISL, DL)	OVER_180_DAYS	1	52003.98	999	2020	6
44	d	80	10	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	1–120_DAYS	0	0	999	2020	6
45	d	80	10	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	121–180_DAYS	2	4000	999	2020	6
46	d	80	10	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	OVER_180_DAYS	2	4000	999	2020	6
47	d	100	12	Pending Discharge - ID Theft (FFEL, FISL, DL)	1–120_DAYS	0	0	999	2020	6
48	d	100	12	Pending Discharge - ID Theft (FFEL, FISL, DL)	121–180_DAYS	1	2055	999	2020	6
49	d	100	12	Pending Discharge - ID Theft (FFEL, FISL, DL)	OVER_180_DAYS	1	2055	999	2020	6
50	d	110	13	Bankruptcy Exclusion	1–120_DAYS	0	0	999	2020	6
51	d	110	13	Bankruptcy Exclusion	121–180_DAYS	100	20000	999	2020	6
52	d	110	13	Bankruptcy Exclusion	OVER_180_DAYS	599	492500.83	999	2020	6
53	d	120	14	Military Exclusion	1–120_DAYS	0	0	999	2020	6
54	d	120	14	Military Exclusion	121–180_DAYS	7	14000	999	2020	6
55	d	120	14	Military Exclusion	OVER_180_DAYS	7	14000	999	2020	6
56	d	130	16	Adversary Proceeding Exclusion	1–120_DAYS	0	0	999	2020	6
57	d	130	16	Adversary Proceeding Exclusion	121–180_DAYS	53	201000.99	999	2020	6
58	d	130	16	Adversary Proceeding Exclusion	OVER_180_DAYS	5	701000.36	999	2020	6
59	d	150	18	Formal Appeals	1–120_DAYS	0	0	999	2020	6
60	d	150	18	Formal Appeals	121–180_DAYS	20	48153.13	999	2020	6
61	d	150	18	Formal Appeals	OVER_180_DAYS	15	40000	999	2020	6
62	d	160	19	SSA Disabled Match (non-grant)	1–120_DAYS	0	0	999	2020	6
63	d	160	19	SSA Disabled Match (non-grant)	121–180_DAYS	3	6233	999	2020	6
64	d	160	19	SSA Disabled Match (non-grant)	OVER_180_DAYS	3	6233	999	2020	6
65	d	170	20	FEMA Disaster Area	1–120_DAYS	0	0	999	2020	6
66	d	170	20	FEMA Disaster Area	121–180_DAYS	2	5090	999	2020	6
67	d	170	20	FEMA Disaster Area	OVER_180_DAYS	2	5090	999	2020	6
68	d	190	25	PIF via AWG	1–120_DAYS	0	0	999	2020	6
69	d	190	25	PIF via AWG	121–180_DAYS	2	5901	999	2020	6
70	d	190	25	PIF via AWG	OVER_180_DAYS	2	5901	999	2020	6
71	d	200	27	Post 65DN Rehab (5 on-time payments)	1–120_DAYS	0	0	999	2020	6
72	d	200	27	Post 65DN Rehab (5 on-time payments)	121–180_DAYS	16	8000	999	2020	6
73	d	200	27	Post 65DN Rehab (5 on-time payments)	OVER_180_DAYS	11	8000	999	2020	6
74	d	210	36	Pending Consolidation	1–120_DAYS	0	0	999	2020	6
75	d	210	36	Pending Consolidation	121–180_DAYS	5	49919	999	2020	6
76	d	210	36	Pending Consolidation	OVER_180_DAYS	5	11000	999	2020	6
77	d	220	45	Restitution Debts (bRestitn)	1–120_DAYS	0	0	999	2020	6
78	d	220	45	Restitution Debts (bRestitn)	121–180_DAYS	1	2650	999	2020	6
79	d	220	45	Restitution Debts (bRestitn)	OVER_180_DAYS	1	2650	999	2020	6
80	d	230	48	VA Disabled Match (non-grant)	1–120_DAYS	0	0	999	2020	6
81	d	230	48	VA Disabled Match (non-grant)	121–180_DAYS	1	2220	999	2020	6
82	d	230	48	VA Disabled Match (non-grant)	OVER_180_DAYS	1	2220	999	2020	6

	A	B	C	D	E	F	G	H	I	J
83	d	240	47	Hardship	1–120_DAYS	0	0	999	2020	6
84	d	240	47	Hardship	121–180_DAYS	11	7500.15	999	2020	6
85	d	240	47	Hardship	OVER_180_DAYS	1	3500	999	2020	6
86	d	250	50	Court-Ordered Settlement	1–120_DAYS	0	0	999	2020	6
87	d	250	50	Court-Ordered Settlement	121–180_DAYS	1	2100	999	2020	6
88	d	250	50	Court-Ordered Settlement	OVER_180_DAYS	32	2100	999	2020	6
89	d	260	51	Litigation Hold	1–120_DAYS	0	0	999	2020	6
90	d	260	51	Litigation Hold	121–180_DAYS	1	3500	999	2020	6
91	d	260	51	Litigation Hold	OVER_180_DAYS	1	73598.44	999	2020	6
92	e	10	26	SSN Change	1–120_DAYS	0	0	999	2020	6
93	e	10	26	SSN Change	121–180_DAYS	1	1950	999	2020	6
94	e	10	26	SSN Change	OVER_180_DAYS	1	1950	999	2020	6
95	e	70	33	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	1–120_DAYS	0	0	999	2020	6
96	e	70	33	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	121–180_DAYS	1	3750	999	2020	6
97	e	70	33	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	OVER_180_DAYS	1	3750	999	2020	6
98	e	100	40	Borrower Defense (FFEL, Perkins)	1–120_DAYS	0	0	999	2020	6
99	e	100	40	Borrower Defense (FFEL, Perkins)	121–180_DAYS	1	2670	999	2020	6
100	e	100	40	Borrower Defense (FFEL, Perkins)	OVER_180_DAYS	1	9541.6	999	2020	6
101	e	120	15	Unenforceable Debt Discharge Process	1–120_DAYS	0	0	999	2020	6
102	e	120	15	Unenforceable Debt Discharge Process	121–180_DAYS	2	4259	999	2020	6
103	e	120	15	Unenforceable Debt Discharge Process	OVER_180_DAYS	1	2000	999	2020	6
104	e	130	46	Pending Subrogation	1–120_DAYS	0	0	999	2020	6
105	e	130	46	Pending Subrogation	121–180_DAYS	20	18000.54	999	2020	6
106	e	130	46	Pending Subrogation	OVER_180_DAYS	5	812000.77	999	2020	6
107	e	140	44	Mixed (Debit/Credit) Balance Debts	1–120_DAYS	0	0	999	2020	6
108	e	140	44	Mixed (Debit/Credit) Balance Debts	121–180_DAYS	1	4500	999	2020	6
109	e	140	44	Mixed (Debit/Credit) Balance Debts	OVER_180_DAYS	1	4500	999	2020	6
110	e	150	52	Closed debt with debit balance	1–120_DAYS	0	0	999	2020	6
111	e	150	52	Closed debt with debit balance	121–180_DAYS	1	1900	999	2020	6
112	e	150	52	Closed debt with debit balance	OVER_180_DAYS	1	1900	999	2020	6
113	e	160	54	Unrelated EIN matches borrower SSN	1–120_DAYS	0	0	999	2020	6
114	e	160	54	Unrelated EIN matches borrower SSN	121–180_DAYS	1	1000	999	2020	6
115	e	160	54	Unrelated EIN matches borrower SSN	OVER_180_DAYS	1	1000	999	2020	6
116	f	10	38	Treasury Reject	1–120_DAYS	103	55800.96	999	2020	6
117	f	10	38	Treasury Reject	121–180_DAYS	15	2635	999	2020	6
118	f	10	38	Treasury Reject	OVER_180_DAYS	1	2635	999	2020	6
119	i	5	N/A	Debt not in portfolio at time of last TOP referral	1–120_DAYS	3	3000.01	999	2020	6
120	i	5	N/A	Debt not in portfolio at time of last TOP referral	121–180_DAYS	0	0	999	2020	6
121	i	5	N/A	Debt not in portfolio at time of last TOP referral	OVER_180_DAYS	0	0	999	2020	6
122	i	10	N/A	Debt does not meet definition for any prior report line	1–120_DAYS	0	0	999	2020	6
123	i	10	N/A	Debt does not meet definition for any prior report line	121–180_DAYS	0	0	999	2020	6
124	i	10	N/A	Debt does not meet definition for any prior report line	OVER_180_DAYS	0	0	999	2020	6

Appendix C – Mapping GA TOP Referral Business Rules to MR-32 & MR-41 Loan Ending Balance Disposition Data Set Lines

Mapping of FSA GA TOP Referral Business Rules to Disposition Data Line Numbers

TOP Exclusions/Exceptions for GAs						Disposition Data Set				
Source: FSA Business Operations list dated 9/26/2018 distribute to GAs by email on 10/3/2019										
BizOps Number[1]	Order of Precedence[2]	Exclusion Reason	(Exclusion, Exception, or Instruction)[3]	GA	Note	LINE_ PREFIX	LINE_ SUFFIX	LINE_SHORT_NAME	From Line	To Line
1	10	Debt is closed i.e. debt's outstanding balance (principal, interest and fees) is equal to $0.	Instruction	Y		b	010	Zero Balance (Closed) Debts	5	7
2	20	Borrower making payments as agreed (in response to 65 Day notice)	Instruction	Y		b	030	Debts 0-120 days delinquent per 65DN Agreement	11	13
3	30	Debt's balance below $25.00: The system shall exclude a debt when the outstanding debt's net balance (principal, interest and fees) is greater than $0 but less than $25.00.	Exclusion	Y		d	010	Debt balance >$0 but < $25	23	25
4	40	Pseudo-SSN (begins with 9)	Exclusion	Y		d	020	Pseudo-SSN (Begins with 9)	26	28
5	50	Borrower filed a timely request for review (hearing) or request for documents	Exclusion	Y		d	030	Request for Formal Review/Documentation	29	31
6	60	Discharge determination pending: death (other than grant overpayments)	Exclusion	Y		d	040	Pending Discharge - Death (non-grant)	32	34
7	70	Discharge determination pending: total and permanent disability (other than grant overpayments)	Exclusion	Y		d	050	Pending Discharge - Disability (TPD) (non-grant)	35	37
8	80	Discharge determination pending: closed school (other than grant overpayments)	Exclusion	Y		d	060	Pending Discharge - Closed School (non-grant)	38	40
9	90	Discharge determination pending: false certification (FFEL, FISL and Direct Loans Only)	Exclusion	Y		d	070	Pending Discharge - False Certification (FFEL, FISL, DL)	41	43
10	100	Discharge determination pending: unpaid tuition refund (FFEL, FISL and Direct Loans Only)	Exclusion	Y		d	080	Pending Discharge - Unpaid Refund (FFEL, FISL, DL)	44	46
12	120	Discharge determination pending: identity theft (FFEL, FISL and Direct Loans Only)	Exclusion	Y		d	100	Pending Discharge - ID Theft (FFEL, FISL, DL)	47	49
13	130	Under bankruptcy stay of collection	Exclusion	Y		d	110	Bankruptcy Exclusion	50	52
14	140	Active military	Exclusion	Y		d	120	Military Exclusion	53	55
15	1150	Debt determined to be unenforceable, not yet closed i.e. Debt excluded via FSA's Unenforceable Debt Discharge Process.	Exception	Y		e	120	Unenforceable Debt Discharge Process	101	103
16	160	Under bankruptcy adversary proceeding stay of collection	Exclusion	Y		d	130	Adversary Proceeding	56	58
18	180	Borrower has filed a formal appeal	Exclusion	Y	6	d	150	Formal Appeals	59	61
19	190	Identified by SSA as eligible for TPD discharge (other than grant overpayments)	Exclusion	Y		d	160	SSA Disabled Match (non-	62	64
20	200	Borrower affected by FEMA-declared major disaster	Exclusion	Y		d	170	FEMA Disaster Area	65	67
22	1220	Still in due process period: notice sent less than 72 days ago, etc.	Exception	Y		c	030	In due process, period not expired	20	22
23	1230	New debt not yet sent due process notice (address is deliverable)	Exception	Y		c	020	Due process not initiated (deliverable)	17	19
24	1240	New debt awaiting address from Treasury for due process notice	Exception	Y		c	010	Due process not initiated (Awaiting Treasury Address)	14	16
25	250	PIF by AWG imminent	Exclusion	Y	4	d	190	PIF via AWG	68	70
26	1260	SSN changed since 65 Day Notice sent	Exception	Y		e	010	SSN Change	92	94
27	270	Borrower has made 5 payments toward rehab on a rehabilitation agreement that was entered into (and first payment made) after 65 day due notice period ended	Exclusion	Y	4	d	200	Post 65DN Rehab (5 on-time payments)	71	73
33	1330	Discharge determination pending: 9/11 survivor (grant overpayments and FFEL and FISL loans only)	Exception	Y		e	070	Pending Discharge - 9/11 Survivors (Grants, FFEL, FISL)	95	97
36	360	Account certified for consolidation in the preceding 90 days; imminent consolidation payoff	Exclusion	Y	4	d	210	Pending Consolidation	74	76
38	2380	Certification request rejected by Treasury (unprocessable)	Part of Debt Remaining to be Referred	Y		f	010	Treasury Reject	116	118
40	1400	Discharge determination pending: borrower defense (FFEL and Perkins loans only)	Exception	Y	5	e	100	Borrower Defense (FFEL, Perkins)	98	100

TOP Exclusions/Exceptions for GAs

Source: FSA Business Operations list dated 9/26/2018 distribute to GAs by email on 10/3/2019

BizOps Number[1]	Order of Precedence[2]	Exclusion Reason	(Exclusion, Exception, or Instruction)[3]	GA	Note
44	1440	Mixed Balance Borrowers: Do not refer to TOP a defaulted debt with a debit balance (i.e., funds owed to the government) if the borrower has a defaulted debt with a credit balance. Note: Credit balance is most likely from an overpayment which might be eligible for reapplication to any borrower debt with a debit balance. Also, credit balance debts are excluded from referral to TOP via a separate business rule.	Exception	Y	7
45	450	Restitution Debts: Do not referral debts where FSA has received a Court order to suspend collection, since a Court determined that the loan was obtained under fraudulent means; and the Court has issued a judgement, will collect on behalf of the debtors (including ED), determine allocation of restitution collected, and remit proceeds to the debtors named in the judgement.	Exclusion	Y	7
46	1460	Pending Subrogation	Exception	Y	7
47	470	Hardship	Exclusion	Y	7
48	480	Identified by VA as eligible for TPD discharge (other than grant overpayments)	Exclusion	Y	7
50	500	Court-ordered settlement: resulting from litigation, a Court orders the loan holder to suspend TOP	Exclusion	Y	7
51	510	Litigation hold: resulting from litigation, OGC determines it is in government's interest to suspend TOP	Exclusion	Y	7
52	1520	Closed debts with a debit balance: debt has a tag (or other indication) that it was previously closed,	Exception	Y	7
53	25	Debt's balance below $0.00 (Credit Balance)	Instruction	Y	7
54	1540	Prevent offset of payments owed to the owner of an Employer Identification Number (EIN) that contains the same digits as the DMCS borrower's SSN	Exception	Y	7

Disposition Data Set

LINE_ PREFIX	LINE_ SUFFIX	LINE_SHORT_NAME	From Line	To Line
e	140	Mixed (Debit/Credit) Balance Debts	107	109
d	220	Restitution Debts (bRestitn)	77	79
e	130	Pending Subrogation	104	106
d	240	Hardship	83	85
d	230	VA Disabled Match (non-	80	82
d	250	Court-Ordered Settlement	86	88
d	260	Litigation Hold	89	91
e	150	Closed debt with debit balance	110	112
b	020	Credit Balance Debts	8	10
e	160	Unrelated EIN matches borrower SSN	113	115

Notes

1	The BizOps Number is simply a reference number used to identify individual exclusion/exception reasons. Some items applicable to FSA only (e.g., discharges available only for Direct Loans) have been omitted, which is why there are gaps in the
2	The Order of Precedence and Exclusion/Exception/Instruction fields will be relevant for both the process report and TROR
3	**Exclusion:** Basis for exclusion of debt from TOP referral is compliant with DCIA per OGC.
	Exception: Exclusion of debt from TOP referral is not compliant with DCIA per OGC but is required by FSA BusOps.
	Instruction: Debt is not eligible for TOP Referral
	Part of Debt Remaining to Be Referred: Debt is eligible for TOP Referral but was not referred (e.g. debt determined to be unenforceable but not yet closed, or certification request was rejected by Treasury as "unprocessable").
4	Mapping is based on assumption that DCIA-compliant exclusion of debt from TOP Referral can be justified based on Financial Hardship. This interpretation must be confirmed by OGC. If not confirmed, the exclusion is likely to be considered a non-DCIA compliant business exception.
5	This is tentative and subject to change: FFEL loans may be deemed ineligible for this exclusion.
6	FSA is awaiting further guidance on what constitutes a "formal appeal" and will not be using this exclusion until such guidance is received.
7	Exclusion/Exception classification is tentative, and must be confirmed by OGC.

Note About Top Exclusions/Exceptions for GAs

The TOP Referral Exclusion/Exception Business Rules for GAs are the responsibility of Program Operations. Questions concerning the TOP referral business process are outside the scope of this document and should be addressed to Program Operations accordingly.

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Appendix D – Guaranty Agency List

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GA Code	GA State	GA Name
708	Colorado	Colorado Student Loan Program dba College Assist
712	Florida	Florida Department of Education, Office of Student Financial Assistance (OSFA)
721	Kentucky	Kentucky Higher Education Assistance Authority (KHEAA)
722	Louisiana	Louisiana Office of Student Financial Assistance (LOSFA)
725	Massachusetts	American Student Assistance dba Massachusetts Higher Education Assistance Corporation (MHEAC)
726	Michigan	Michigan Guaranty Agency (MGA)
731	Nebraska	Nebraska or National Student Loan Program (NSLP)
733	New Hampshire	New Hampshire Higher Education Assistance Foundation
735	New Mexico	New Mexico Student Loan Guarantee Corporation
736	New York	Higher Education Services Corporation (HESC)
737	North Carolina	North Carolina State Education Assistance Authority (NCSEAA)
740	Oklahoma	Oklahoma College Assistance Program (OCAP)
742	Pennsylvania	Pennsylvania Higher Education Assistance Agency (PHEAA)
748	Texas	Texas Guaranteed Student Loan Corporation
749	Utah	Utah Higher Education Assistance Authority (UHEAA)
750	Vermont	Vermont Student Assistance Corporation (VSAC)
755	Wisconsin	Ascendium Education Solutions
927	Minnesota	Educational Credit Management Corporation I
951	Minnesota	Educational Credit Management Corporation II

Appendix E – Glossary of Acronyms

Appendix E – Glossary of Acronyms

Acronym / Term	Description
65-Day Notice Period	Required period of notification to the borrower that delinquent *Title IV* debt will be sent to TOP for administrative offset unless the borrower enters into a Rehabilitation Agreement or Repayment Agreement prior to the end of the 65-day notice period or responds with a timely Request for Review or Request for Documents. The 65-Day Notice sent during this period satisfies the requirement to complete TOP due process before referring a debt to TOP.
Aging Data	MR-32 Loan Ending Balance Aging Data Set
CFOC	Chief Financial Officers' Council
Claim Date	The date a Guaranty Agency pays a lender's claim.
COB	Close of Business
Congress	The United States Congress
CSV	Comma-Separated Value (Comma Delimited)
CY	Calendar Year
DCIA	*Debt Collection Improvement Act of 1996,* as amended
DCIA Compliance Data Set	DCIA Aging and Compliance Data Set (i.e., the three Data Set requirements, collectively)
Department	United States Department of Education
Disposition Data	MR-32 & MR-41 Loan Ending Balance Disposition Data Set
Exception	A set of criteria, not authorized by DCIA, that when met FSA excludes a debt from referral to TOP or inactivates a debt already at TOP. This set of criteria is based upon FSA policy. An example of excepted debt is debt determined to be unenforceable but not yet closed out.
Exclusion	A set of criteria that is compliant with DCIA, that when met, FSA may exclude a debt from referral to TOP or inactivate a debt already at TOP as authorized by DCIA. Examples of excluded debt include debt less than $25 dollars, debt in bankruptcy, etc.
FFEL	Federal Family Education Loan Program
Form 1099-C	IRS Form 1099-C, Cancellation of Debt
FSA	Federal Student Aid
FY	Fiscal Year
GA	Guaranty Agency

Acronym / Term	Description
GAFR	Guaranty Agency Financial Report (ED Form 2000)
HEA	*Higher Education Act of 1965,* as amended
IRS	Internal Revenue Service
LLR	Lender-of-Last Resort
MR	Monthly Report
MR-24	Collection Terminations (GAFR Line Reference)
MR-32	Ending Balance of Defaulted Loans (GAFR Line Reference)
MR-41	Ending Balance on Bankruptcies (GAFR Line Reference)
MS	Microsoft
OGC	Office of General Counsel
OMB	Office of Management and Budget
Rehabilitation Agreement	Default resolution agreement available to qualified defaulted *Title IV* borrowers under the terms of which if the borrower makes nine on-time payments (i.e., pays within 20 days of the due date) during a period of ten consecutive months, the debt will be considered "rehabilitated." The rehabilitated loan is repurchased by a lender or assigned to FSA, clearing the default and resetting the delinquency age to zero (i.e., "current").
Reinsurance Date	The date the Department reimburses a GA for a previously paid claim.
Repayment Agreement	For the DCIA aging, the term Repayment Agreement is reserved to refer to any non-rehabilitation repayment agreement entered into by the borrower after the default of their *Title IV* debt.
Title IV	*Title IV* of *the Higher Education Act of 1965*, as amended
TOP	Treasury Offset Program
TPD	Total and Permanent Disability
Treasury	United States Department of Treasury
Write-Off Data	MR-24 Collection Terminations Write-Off Data Set