Common Origination & Disbursement (COD) is a streamlined method for processing, storing, and reconciling Academic Competitiveness Grant (ACG), National Science and Mathematics Access To Retain Talent Grant (National SMART Grant), Federal Pell Grant (Pell Grant), and William D. Ford Federal Direct Loan (Direct Loan) financial aid data with the U.S. Department of Education.

Schools, third party servicers, and software developers can obtain information about current production issues, news, and COD System functionality through various channels such as the COD Web site and the IFAP Web site. To view Frequently Asked Questions about COD, click here.

On January 23, 2008, Federal Student Aid (FSA) of the U.S. Department of Education notified the Postsecondary Electronic Standards Council (PESC) that it wished to submit COD as a PESC approved standard.

With the development work completed and submitted on May 22, 2008, the COD specification was made available for public comment. The complete submission was posted at www.PESC.org and the thirty (30) calendar day public comment period began on Thursday May 22, 2008. Public comment period expired at the close of business on Friday June 20, 2008. Public comments were routed to the Change Control Board (CCB) for review and responses were submitted July 18, 2008.

All public comments and responses are posted to the PESC website.

Public Comment 1

Issue: The hierarchy of:

Reporting School
   Attended School
      Student

The above hierarchy implies that Attended Schools are unique within Reporting Schools and that Students are unique only within Reporting and Attended Schools. Each Reporting and Attended school should establish their own student identifiers and other Reporting and Attended schools would not affect them.
Reason: Actually, the Student identifier is unique at COD. One school can establish a student’s identifier and another school can change this identifier. This can cause the original school’s submitted records to be rejected because COD changed the student’s identifier.

Proposed Solution: Have the Student be the highest block and have reporting and attended Schools be elements within the student. This would make it clear that the student identifier transcended all schools and would match the underlying COD database.

Response: FSA will forward this issue on to the COD team for discussion and review as this issue appears more like a system issue than a schema design issue.

Public Comment 2

Issue: Generating the summary block is difficult to develop, and time consuming to maintain. There is no benefit derived from having it. Some would argue that this is an additional verification check to make sure the data is correct. However, this is like requesting a spreadsheet and requiring the sender to put a calculated cell at the end that sums up all the cells, and then using this as verification.

Reason: Others would argue that summary block is to make sure that the entire file is received. However, since this is an XML document one can be assured that if they received the document they received the entire document.

Proposed Solution: Eliminate the summary block. (Or at least make it optional). This would increase performance and reduce complexity.

Response: FSA will forward this issue on to the COD team for discussion and review to see if they are willing to make a system change to not require this data.

Public Comment 3

Issue: COD will not accept an actual disbursement unless the disbursement sequence number is one higher than the sequence number they have on file. This makes it difficult to keep systems in sync. And once the systems get out of sync it is very difficult to get them back in sync. The use of the Disbursement Sequence Number makes it very risky to send additional data if the response from the previous send is not received and processed, because any rejected disbursement will cause all subsequent disbursements to be rejected until the disbursement sequence number is back in sync.

Reason: Also with the Disbursement Sequence Number, when a change, which generates the next disbursement sequence number, is made on the COD web site then the school’s system’s sequence number is no longer in sync with COD’s sequence number.

Proposed Solution: Eliminate the Disbursement Sequence Number. Since any submitted disbursement represents the current state of the disbursement, any system that does not contain the same data as COD could send the new data and not have to determine what
Disbursement Sequence Number to use. If necessary a Date and Time field could be put on the disbursement to identify which record is more recent.

Response: FSA will forward this issue on to the COD team for discussion and review as this issue appears more like a system issue than a schema design issue.

Public Comment 4

Issue: Whenever funds are given to a student, a new disbursement number is to be used to record this. Currently COD only allows 20 disbursement numbers for a Direct Lending Loan. With a school’s system that integrates Financial Aid, Student registration, Accounts Receivable, and General Ledger, the funds given to a student is very volatile.

Reason: Even though a school may schedule only 4 or 5 disbursements on a loan, the actual disbursements can easily exceed the 20 limit.

Proposed Solution: Increase the disbursement number field for 2 digits to 3 digits which will increase the limit to accommodate a volatile student.

Response: FSA will forward this issue on to the COD team for discussion and review as this issue appears more like a system issue than a schema design issue.

Public Comment 5

Issue: The use of Routing ID is very beneficial. However, there are still fields in the XML document that requires the use of additional IDs for schools.

Reason: This increases the difficulty of keeping track of these IDs, and in reconciling school’s data.

Proposed Solution: Change the fields that use school IDs other than the Routing ID to use the Routing ID. These include the FinancialAwardIDs of ACG, SMART, TEACH, PELL and Direct Lending loans.

Response: FSA will forward this issue on to the COD team for discussion and review as this issue appears more like a system issue than a schema design issue.

Public Comment 6

Issue: Many Required fields should be optional if the data has not changed. The XML document is cluttered with data that is not changing and thus makes it more difficult to understand the document.
**Reason:** Many fields are only included if they are being changed, so seeing a field on a document can indicate that the field is changing. But with so many “exceptions” one is hard pressed to interpret the document.

**Proposed Solution:** Change some of the required fields to optional, and only required if the data is changing. Some of these fields are:
   - The Student’s Address
   - The Student’s Dependency Status <DependencyStatusCode>
   - The Student’s Citizenship <Citizenship>

**Response:** FSA will forward this issue on to the COD team as this issue appears to address business process rather than schema design.

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**Public Comment 7**

**Issue:** The construct of an Award Key to contain shared data between loans and awards of the same student, is confusing, and complex to implement.

**Reason:** The reduction of repeated data is minimal and not worth the extra complexity.

**Proposed Solution:** Remove the Award Key structure; just populate the data in the appropriate block. If the data is required to be the same between loans (for example combined loans) then create a block between the student and the loan to contain shared data. This data should then always be located in this new block and be removed from the loan block.

**Response:** The CCB agrees and for future schema development, the CCB agrees that the Reference Key Structure implementation would not be recommended. The Technical Advisory Board (TAB) will add this issue to their modeling document.

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**Public Comment 8**

**Issue:** Some fields are use for multiple purposes. Sometimes these purposes clash with each other.

**Reason:** This prevents schools from being able to create an XML document that conveys all the information that is required.

**Example:** Field1 – Transaction number. <CPSTransactionNumber>

The CPSTransactionNumber is at the award level. This is used to identify the transaction number used by the school to justify the award/loan. This is a proper use of this field. COD also uses this field to validate a student’s identifier. This sometimes creates cross purposes. Sometimes a loan or award is given to a student based on a transaction. The student may have a name change that causes the identifier to change. When this occurs there is no way that the XML document can convey both pieces of information. COD sometimes rejects the record because they use the transaction number on the XML document to valid the person
identifier by checking with CPS, and sometime they reject this record because they check the
transaction number against the highest transaction number on CPS.

**Proposed Solution:** Use the CPSTransactionNumber at the award level to identify the
transaction associated to that award. Add the CPSTransactionNumber at the student level to
identify the transaction number used to confirm the student’s identifier with CPS.

**Response:** FSA will forward this issue on to the COD team as this issue appears to address
business process rather than schema design.

**Public Comment 9**

**Issue:** Many of the fields on the schema are redundant with the information on CPS.

Field 1 –
- Student Address
- DriversLicenseState
- DriversLicenseNumber

The student’s address, driver’s license number and state are already on the student’s CPS
record. COD is already accessing CPS’s database.

**Reason:** Requiring the student address to be sent in on every XML document is unnecessary
overhead and requires multiple places for the schools to maintain the student’s address and
driver’s license information.

**Proposed Solution:** Remove the student address, driver’s license state, and driver’s license
number from the XML document. COD should get this information from CPS.

**Response:**

Field 2 – Dependency Status <DependencyStatusCode>

The student’s dependency status is required in the award blocks. The CPS Transaction
number is already a required field in that block. The school is using the dependency status on
the CPS Transaction number.

**Reason:** So since the school is reporting the CPS transaction number used to support the
award/loan, they are required to use the dependency status on that transaction number.

**Proposed Solution:** Remove dependency status from the XML schema. COD should use the
CPS Transaction number to get the dependency status.

**Response:** FSA will forward this issue on to the COD team as this issue appears to address
business process rather than schema design.
Public Comment 10

Issue:

<MPN>
<MPNStatusCode ID>
<MPNLinkIndicator>
<MPNExpirationDate>

The MPN information is inside the Loan block. This information is not loan specific. When a student submits a valid MPN this affects all existing loans.

Reason: The information within each loan becomes invalid. And updated MPN information that can affect all loans is sent to the school attached to a specific loan. Also COD can and does send schools MPN data inside of a loan block that has no loan ID.

Proposed Solution: Create an MPN block under the student level at the same level as loans and awards. This would represent more accurately how MPNs are to be applied.

Response: FSA will forward this issue on to the COD team as this issue appears to address business process rather than schema design.