Understanding Borrower Aggregates on NSLDS

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Agenda

- What are NSLDS Aggregates?
- Understand why aggregates are calculated
- Review aggregate loan terms
- Describe NSLDS aggregate calc. logic
- Review three main "groups" of loans that affect aggregate limit calculations
  - Formulas for determining Aggregate OPB
  - Detailed discussion of consolidation
- Provide a reference for your use
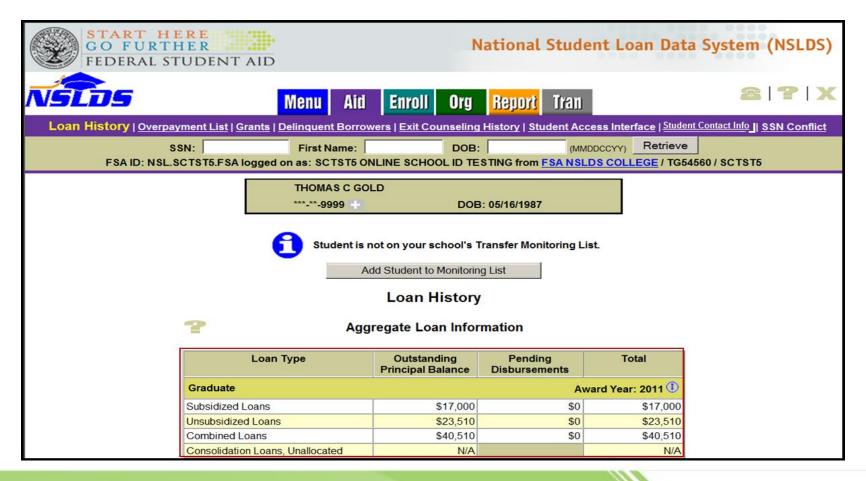
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What is the NSLDS Aggregate Calculation?

- Loan Aggregates:
  - Total amounts student borrower has used toward subsidized and combined loan limits
- Aggregate data provided on:
  - Institutional Student Information Record (ISIR)
  - Aggregate Loan Information table (NSLDS)

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Viewing Aggregate Data on NSLDS

Viewing Aggregate Data on the ISIR

Under the "NSLDS Financial Aid History" section:

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..........................................................................
Subsidized Usage Limit Applies Flag: Y Subsidized Loan Eligibility Used: 999.999
Aggregate Amounts:                    Outstanding      Pending          Total:
#FFEL/Direct Loans:                   Prin. Bal.:      Disb(s):
Subsidized Loans:                     $999,999         $999,999         $999,999
Unsubsidized Loans:                   $999,999         $999,999         $999,999
TEACH Loans:                          $999,999                          $999,999
Combined Loans:                       $999,999         $999,999         $999,999
Unallocated Consolidation Loans:      $999,999                          $999,999
#Perkins Loans:
Outstanding Principal Bal.:      $999,999  Current Year Loan Amount:  $999,999
TEACH Grants:
Undergrad/Post Bacc Disb Amount:$999,999  Grad Disbursement Amount:  $999,999
**************************************************************************
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Why Calculate Aggregates?

- Assist schools when determining appropriate loan awards

- Help ensure that student is eligible for loan amounts

- Provide notification of aggregate changes through ISIR Post screening when eligibility should be reviewed

- Aggregate Balance vs. Outstanding Principal Balance (OPB)

- Ensure that only the amount the student borrowed is used

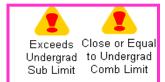U.S. Department of **Education**

A Few Key Terms

- Aggregate Loan Limits
- Aggregate Amounts
  - Loan-Level Aggregate Principal Balance
  - Aggregate Loan Information
- Net Loan Amount
  - Loan Amount - Cancellations - Refunds
- Pending Disbursement
  - Loan Amount - Cancellations – Refunds – Total Disbursed
- Outstanding Principal Balance

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Aggregate Loan Limits

Loan History
Aggregate Loan Information

	Loan Type	Outstanding Principal Balance	Pending Disbursements	Total
+	Subsidized Loans	$20,458	$3,667	$24,125
=	Unsubsidized Loans	$15,333	$2,667	$18,000
	Combined Loans	$35,791	$6,334	$42,125
	Consolidation Loans, Unallocated	$2,375		$2,375
	Perkins Loans	N/A		N/A
	PLUS Loans	$0		$0

Exceeds Undergrad Sub Limit   Close or Equal to Undergrad Comb Limit

- Undergraduate Loan Limits: Subsidized / Combined
- Graduate Loan Limits: Subsidized / Combined
- System flags when borrower exceeds or is close to/equal to a loan limit

8

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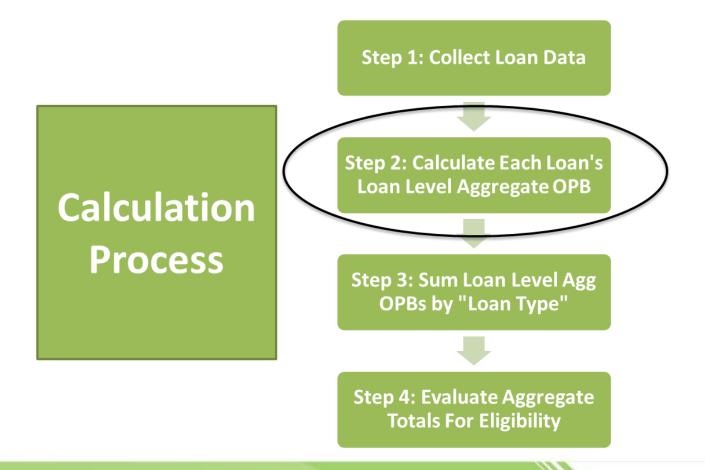
Step 1

Calculation Process

Step 1: Collect Loan Data

Step 2: Calculate Each Loan's Loan Level Aggregate OPB

Step 3: Sum Loan Level Agg. OPBs by "Loan Type"

Step 4: Evaluate Aggregate Totals For Eligibility

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Step 1: Collect Loan Data

Loan Summary

1	**D1 - DIRECT STAFFORD SUB**				Status: **IA** as of 09/20/2013		Loan Detail	
Approved Amt:	$2,500	**Disbursed Amt:**	$1,250	**OPB:**	$1,250	**Agg. OPB:**	$1,250
Loan Date:	09/20/2013	**Sep. Loan Ind:**	A	**Loan Period:**	08/26/2013 - 05/17/2014		
Last Disb. Date:	09/20/2013	**Last Disb. Amt:**	$1,250	**Acad. Lv:**	2		
ED Servicer:	DEPT OF ED/SALLIE MAE - 578						

- NSLDS receives loan data from loan holders/servicers daily
- Error checks data upon intake
- Updates borrower Financial Aid History (FAH)

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Step 2

Calculation Process

Step 1: Collect Loan Data

Step 2: Calculate Each Loan's Loan Level Aggregate OPB

Step 3: Sum Loan Level Agg OPBs by "Loan Type"

Step 4: Evaluate Aggregate Totals For Eligibility

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Step 2: Calculate Each Loan's Loan Level Aggregate OPB

- NSLDS reviews loans in student's financial aid history

- Determines type of calculation to be used based on category of loan

- Applies appropriate calculation type

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Categories of Loans

- Three main types of calculations
  - Recent loans
  - Older loans
  - Consolidation loans

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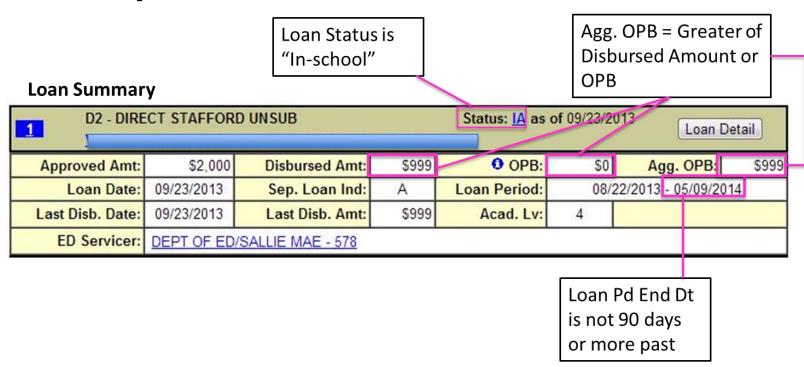
Recent Loans

Defined As	• In-school status (IA, ID, IG, IM) • Loan Pd End Date + 90 days not yet passed
Calculation Used	• Total Disbursed or OPB, whichever is <u>greater.</u> • Why?

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Components of Recent Loans

Loan Status is "In-school"

Agg. OPB = Greater of Disbursed Amount or OPB

Loan Summary

1	D2 - DIRECT STAFFORD UNSUB			Status: IA as of 09/23/2013		Loan Detail
Approved Amt:	$2,000	**Disbursed Amt:**	$999	ⓘ **OPB:**	$0	**Agg. OPB:** $999
Loan Date:	09/23/2013	**Sep. Loan Ind:**	A	**Loan Period:**	08/22/2013 - 05/09/2014	
Last Disb. Date:	09/23/2013	**Last Disb. Amt:**	$999	**Acad. Lv:**	4	
ED Servicer:	DEPT OF ED/SALLIE MAE - 578					

Loan Pd End Dt is not 90 days or more past

Note: This loan has pending disbursements. Pending disbursements = Loan Amount – Cancelations – Refunds – Total Disbursed

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Step 2: Calc (All) Loan Level Agg.

1	**D2 - DIRECT STAFFORD UNSUB**			**Status: IA** as of 09/23/2013			Loan Detail
Approved Amt:	$2,000	Disbursed Amt:	$999	**ⓘ** OPB:	$0	Agg. OPB:	$999
Loan Date:	09/23/2013	Sep. Loan Ind:	A	Loan Period:		08/22/2013 - 05/09/2014	
Last Disb. Date:	09/23/2013	Last Disb. Amt:	$999	Acad. Lv:	4		
ED Servicer:	DEPT OF ED/SALLIE MAE - 578						

2	**D2 - DIRECT STAFFORD UNSUB**			**Status: IA** as of 09/23/2013			Loan Detail
Approved Amt:	$5,000	Disbursed Amt:	$2,500	OPB:	$2,500	Agg. OPB:	$2,500
Loan Date:	09/23/2013	Sep. Loan Ind:	A	Loan Period:		08/22/2013 - 05/09/2014	
Last Disb. Date:	09/23/2013	Last Disb. Amt:	$2,500	Acad. Lv:	4		
ED Servicer:	DEPT OF ED/SALLIE MAE - 578						

3	**D0 - DIRECT STAFFORD SUB (SULA ELIGIBLE)**			**Status: IA** as of 09/23/2013			Loan Detail
Approved Amt:	$5,500	Disbursed Amt:	$2,750	OPB:	$2,750	Agg. OPB:	$2,750
Loan Date:	09/23/2013	Sep. Loan Ind:	A	Loan Period:		08/22/2013 - 05/09/2014	
Last Disb. Date:	09/23/2013	Last Disb. Amt:	$2,750	Acad. Lv:	4		
ED Servicer:	DEPT OF ED/SALLIE MAE - 578						

Note: $1 Canceled on Loan #1
Unsub Loans: $999 + $2,500 + Pending Disb ($1,000 + $2,500) = $6,999
Subsidized Loan: $2,750 + Pending Disb ($2,750) = $5,500

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Subsidized Aggregate Calc. Components

Subsidized OPB- Loan Types (from Loan Summary- Agg. OPBs)

Older Loans

- FFEL Subsidized (SF)

Recent or Older Loans

- Direct Stafford Subsidized (D1)
- Direct Stafford Subsidized (SULA Eligible) (D0)

Calculated Sub Amounts of Consolidation Loans

- Direct Consolidation Subsidized (D6)
- FFEL Consolidation (CL)
- Direct Consolidation Subsidized (SULA Eligible) (D9)

Loan History
Aggregate Loan Information

Loan Type	Outstanding Principal Balance	Pending Disbursements	Total
Subsidized Loans	$20,458	$3,667	$24,125

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Unsubsidized Aggregate Calc. Components

Unsubsidized OPB- Loan Types (from Loan Summary- Agg. OPBs)

Older Loans

- FFEL Unsub Supplemental Loan (SL)
- FFEL Refinanced Loan (RF)
- Federally Insured (FISL) FFEL Refinanced Loan (FI)
- FFEL Stafford Unsubsidized Loan (SU)

Recent or Older Loans

- Direct Stafford Unsubsidized (D2)

Calculated Unsub Amounts of Consolidation Loans

- Direct Consolidation Unsubsidized (D5)
- FFEL Consolidation (CL)

Loan History
Aggregate Loan Information

Loan Type	Outstanding Principal Balance	Pending Disbursements	Total
Unsubsidized Loans	$15,333	$2,667	$18,000

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Step 3

Calculation Process

Step 1: Collect Loan Data

Step 2: Calculate Each Loan's Loan Level Aggregate OPB

Step 3: Sum Loan Level Agg. OPBs by "Loan Type"

Step 4: Evaluate Aggregate Totals For Eligibility

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Step 3: Sum Loan Level Agg. OPBs by Loan Type

Loan History

Aggregate Loan Information

From Agg. OPB fields of each loan

Loan Type	Outstanding Principal Balance	Pending Disbursements	Total
Undergraduate			Award Year: 2014
Subsidized Loans	$2,750	$2,750	$5,500
Unsubsidized Loans	$3,499	$3,500	$6,999
Combined Loans	$6,249	$6,250	$12,499
Consolidation Loans, Unallocated	N/A		N/A
Totals			
Subsidized Loans	$2,750	$2,750	$5,500
Unsubsidized Loans	$3,499	$3,500	$6,999
Combined Loans	$6,249	$6,250	$12,499
Consolidation Loans, Unallocated	N/A		N/A
Other			
Perkins Loans	N/A		N/A

Total Used Toward Sub and Combined Aggregate Loan Limits

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Calculation Type #2: Older Loans

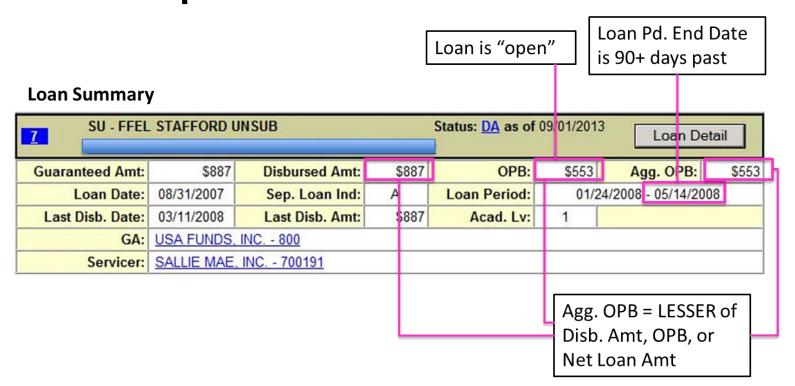| **Defined As**	• Must be an open loan (i.e., OPB > 0) • Loan Pd. End Date is 90 or more days past
Calculation Used	• Total Disbursed, OPB, or Net Loan Amount, whichever is <u>lesser</u>. • Why?

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Components of Older Loans

Loan Detail

Loan Summary

7	SU - FFEL STAFFORD UNSUB			Status: DA as of 09/01/2013		Loan Detail	
Guaranteed Amt:	$887	**Disbursed Amt:**	$887	**OPB:**	$553	**Agg. OPB:**	$553
Loan Date:	08/31/2007	**Sep. Loan Ind:**	A	**Loan Period:**	01/24/2008 - 05/14/2008		
Last Disb. Date:	03/11/2008	**Last Disb. Amt:**	$887	**Acad. Lv:**	1		
GA:	USA FUNDS, INC. - 800						
Servicer:	SALLIE MAE, INC. - 700191						

Loan is "open"

Loan Pd. End Date is 90+ days past

Agg. OPB = LESSER of Disb. Amt, OPB, or Net Loan Amt

Reminder:
Net Loan Amount = Loan Amount – Cancelations – Refunds

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Capitalized Interest On Older Loans

OPB $2104 should be the "LESSER" of Disb Amount, OPB, or Net Loan Amount

Why isn't OPB value being used for Agg. OPB? Difference = $42

SF - FFEL STAFFORD SUB			Status: DA as of 09/01/2013		Loan Detail
Guaranteed Amt:	$2,926	**Disbursed Amt:** $2,926	**OPB:** $2,104	**Agg. OPB:**	$2,062
Loan Date: 08/18/2008		**Sep. Loan Ind:** A	**Loan Period:**	08/25/2008 - 05/15/2009	
Last Disb. Date: 02/10/2009		**Last Disb. Amt:** $1,463	**Acad. Lv:** 2		
ED Servicer:	DEPT OF ED/SALLIE MAE - 578				

Loan Detail

- Capitalized interest is NOT counted toward Aggregate OPB for older loans (Direct or FFEL) serviced by the Department

23

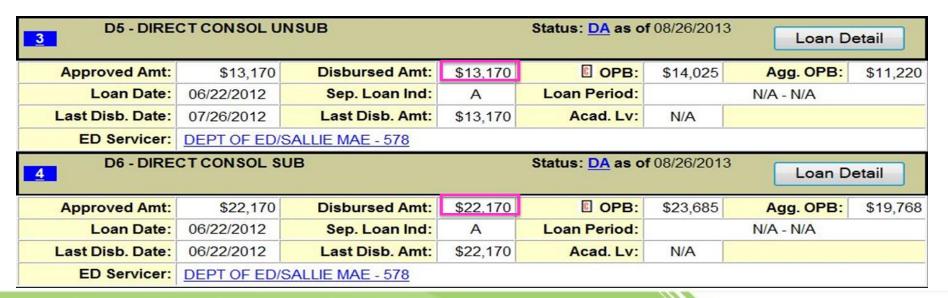U.S. Department of Education

Calc. Type #3: Consolidation Loans

The same core process is used to determine impact of consolidated loans on Agg. OPB, regardless of consolidated loan type (CL, D5, D6, D9):

1. Identify all active consolidated loans and Disbursed Amounts
2. Identify all underlying loans and Disbursed Amounts
3. Determine ratios for each loan type (Sub/Unsub/Perkins/PLUS)
4. Determine Calculated Agg. OPB
5. Determine the Unallocated Agg. OPB
6. Calculate the Combined Loans Agg. OPB

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Identify Active Consolidation Loans

- Loan Type = CL, D5, D6, D9
- Loan should currently be "open" (OPB > 0)
- Note the Disbursed Amounts for each loan
- Note which (Disb Amt/ OPB/ Net Amt) is the LESSER

3	D5 - DIRECT CONSOL UNSUB				Status: DA as of 08/26/2013		Loan Detail	
Approved Amt:	$13,170	Disbursed Amt:	$13,170	OPB:	$14,025	Agg. OPB:	$11,220	
Loan Date:	06/22/2012	Sep. Loan Ind:	A	Loan Period:	N/A - N/A			
Last Disb. Date:	07/26/2012	Last Disb. Amt:	$13,170	Acad. Lv:	N/A			
ED Servicer:	DEPT OF ED/SALLIE MAE - 578							

4	D6 - DIRECT CONSOL SUB				Status: DA as of 08/26/2013		Loan Detail	
Approved Amt:	$22,170	Disbursed Amt:	$22,170	OPB:	$23,685	Agg. OPB:	$19,768	
Loan Date:	06/22/2012	Sep. Loan Ind:	A	Loan Period:	N/A - N/A			
Last Disb. Date:	06/22/2012	Last Disb. Amt:	$22,170	Acad. Lv:	N/A			
ED Servicer:	DEPT OF ED/SALLIE MAE - 578							

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Identify Underlying Loans

- Method #1: Explicit linkages
- For Direct Loan consolidations (D5, D6, D9) links are reported by the loan holder. (New!)
- Not for FFEL consolidations (CL)
- When available, system will use these links first
- When explicit links are reported:
- D2, D3, D4, D5, CL, RF, SL, SU, PL, or GB should be linked to the D5
- D0, D1, D6, D9, SF, or CL should be linked to the D6
- These links are not visible on NSLDS FAP website
- Note: System will ignore links reported for PU, EU, NU, DU, or IC loans and consider these under Method #2.

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Identify Underlying Loans

Method #2: 210 Day Rule

Applies to underlying loans for which an explicit relationship was either not reported or not required.

Examples:

- Loans underlying a FFEL consolidation (CL)
- Loans underlying some Direct Consolidations (D5/D6/D9)
- PU, NU, DU, EU, IC loan types

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Identify Underlying Loans

Loan History

Method #2: 210 Day Rule

Direct Consolidations (D5 / D6 / D9)

IF Loan Status is one of these: PC, PN, DN, DP, PF
AND Loan Status Date is within 210 days of (before or after) the D5's Loan Date
AND Loan Type is D2, D3, D4, D5, CL, RF, SL, SU, FI, PL, or GB
THEN the loan is an underlying loan for the D5 consolidation.

IF Loan Status is one of these: PC, PN, DN, DP, PF
AND Loan Status Date is within 210 days of (before or after) the D6's Loan Date
AND Loan Type is D0, D1, D6, D9, SF, CL, PU, NU, DU, EU, or IC
THEN the loan is an underlying loan for the D6 consolidation.

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Identify Underlying Loans

Method #2: 210 Day Rule

FFEL Consolidations (CL)

IF Loan Status is one of these: PC, PN, DN, DP, PF
AND Loan Status Date is within 210 days of (before or after) a consolidation loan's <u>Loan Date</u>
THEN the loan is underlying for that consolidation loan.
Note: When multiple FFEL consolidations with different Loan Dates exist, the consol. with the closest LOAN DATE to the underlying loan's LOAN STATUS DATE is assigned the underlying loan.   When multiple FFEL consolidations share the same Loan Date, underlying loans are split across those loans.

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Underlying Loans: Disbursements

Total the underlying disbursements by loan type.

Loan History

	D5 (Total Disbursed)	D6 (Total Disbursed)
Sub.	= $0	($172 + $3,500 + $5,500 + $2,872 +$724 + $3,500 + $3,500) = **$19,768**
Unsub.	($3,092+ $5,500 + $2,628) = **$11,220**	= $0
PLUS	(no loans) = $0	= $0
Perkins	= $0	($2,000) = **$2,000**

30

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Determining Ratios

NSLDS determines how much of a consolidation loan to apply to the Sub/Unsub/Unallocated portions of the Aggregate Loan Info table based on the percentage attributable to each underlying Loan Type.

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Determine Ratios – How?

- Calculate attribution ratios for each consolidated loan:

Sum of Underlying Loans' Disbursed Amounts
(by loan type for that consolidation)

Ratio = ───────────────────────────────────────

Consolidated Loan's Disbursed Amount

Sub	Unsub	PLUS	Perkins
0 / $13,170 $19,768 / $22,170	$11,220 / $13,170 0 / $22,170	0 / $13,170 0 /$22,170	0 / $13,170 $2,000 / $22,170
(D5): N/A (D6): 89.17%	(D5): 85.19% (D6): N/A	(D5): N/A (D6): N/A	(D5): N/A (D6): 9.02%

- What if these were FFELP consolidations?

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Apply Ratios

D5 - DIRECT CONSOL UNSUB				Status: DA as of 08/26/2013			Loan Detail
Approved Amt:	$13,170	**Disbursed Amt:**	$13,170	**OPB:**	$14,025	**Agg. OPB:**	$11,220
Loan Date:	06/22/2012	**Sep. Loan Ind:**	A	**Loan Period:**		N/A - N/A	
Last Disb. Date:	07/26/2012	**Last Disb. Amt:**	$13,170	**Acad. Lv:**	N/A		
ED Servicer:	DEPT OF ED/SALLIE MAE - 578						

- Determine calculated aggregate OPB impact of each consolidated loan by multiplying ratio for each loan type by the LESSER of either its Disb Amt, OPB, or Net Amt.

Calculated Agg. OPB = **Ratio** × **(Consolidated Loan's LESSER Amt)**

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Applying Ratios: Example

	Consolidated (LESSER)	Calculated (Loan Type) Aggregates to be added to Aggregate Loan Info table			
		Sub	Unsub	PLUS	Perkins
D5	$13,170	x 0 = 0	x .8519 = $11,220	x 0 = 0	x 0 = 0
D6	$22,170	x .8917 = $19,768	x 0 = 0	x 0 = 0	x .0902 = $2,000

Q: Why do these ratios total less than 100%?

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Unallocated Amounts

- When the Sum of Total Disbursed (Underlying loans) < Total Disbursed (Consolidation loan), your attributable ratios (Sub/Unsub/Perkins, PLUS) will always add up to less than 100%

- This remainder is the "Unallocated" portion of the Consolidation loans' Agg. OPB

- Unallocated amounts do NOT count against the borrower's aggregate totals

- Why would this scenario happen?

- How to determine "Consolidated Unallocated $" found in Aggregate Loan Info table?

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Calculate Unallocated Amounts

		D5	D6
	Consolidated Loan's "LESSER" Amt	$13,170	$22,170
-	Total Perkins Share (D6)	0	$2,000
-	Total PLUS Share (D5)	0	0
-	Calculated Sub Aggregate OPB	0	$19,768
-	Calculated Unsub Aggregate OPB	$11,220	0
=	**Calculated Consolidation, Unallocated Aggregate OPB**	**$1,950**	**$402**

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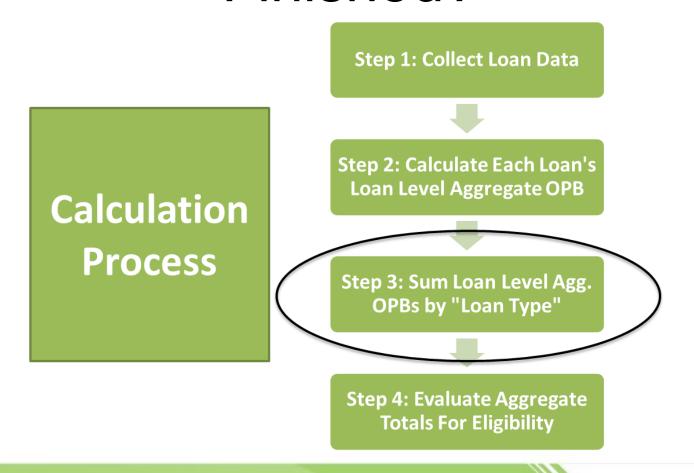
Calculate Unallocated Amounts

Note the system's "round up" to nearest $1 on each consolidation

Loan History

Aggregate Loan Information

Loan Type	Outstanding Principal Balance	Pending Disbursements		Total
Undergraduate			Award Year: 2014 ⓘ	
Subsidized Loans	$24,668	$2,750		$27,418
Unsubsidized Loans	$14,720	$3,500		$18,220
Combined Loans	$39,388	$6,250		$45,638
Consolidation Loans, Unallocated	$2,354			$2,354
Totals				
Subsidized Loans	$24,668	$2,750		$27,418
Unsubsidized Loans	$14,720	$3,500		$18,220
Combined Loans	$39,388	$6,250		$45,638
Consolidation Loans, Unallocated	$2,354			$2,354
Other				
Perkins Loans	N/A			N/A

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Consolidation Calculations Finished?

Calculation Process

Step 1: Collect Loan Data

Step 2: Calculate Each Loan's Loan Level Aggregate OPB

Step 3: Sum Loan Level Agg. OPBs by "Loan Type"

Step 4: Evaluate Aggregate Totals For Eligibility

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Final Roll-up: (Step 3 Revisited)

- NSLDS collects all loan level Agg. OPB numbers (Recent Loans, Older Loans, Consolidation Loan Allocations)

- Groups those calculated numbers into their respective "buckets" (Sub/Unsub/Consolidated Unallocated)

- Sub-groups those by undergrad vs. grad loans if both types exist (Academic Level 1/2/3/4/5/N vs. A/B/C/D/G)
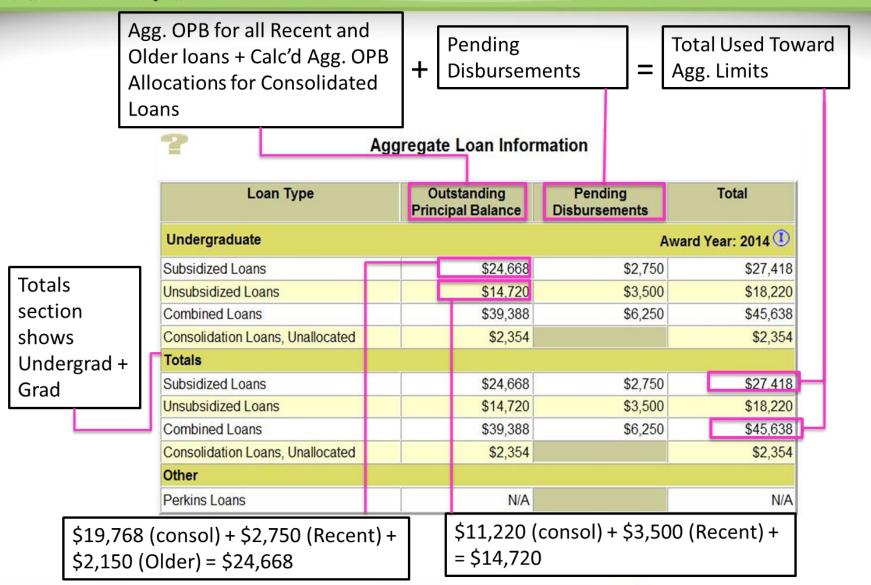
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Step 3: Sum Loan Level Agg. OPBs

- NSLDS then sums Loan Level Agg. OPBs for each group (Sub, Unsub, Unallocated)

- Adds in pending disbursements for each loan type group/level

- Displays each loan type's Aggregate OPB Totals in Aggregate Loan Information table

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Agg. OPB for all Recent and Older loans + Calc'd Agg. OPB Allocations for Consolidated Loans

+

Pending Disbursements

=

Total Used Toward Agg. Limits

Aggregate Loan Information

Loan Type	Outstanding Principal Balance	Pending Disbursements	Total
Undergraduate			Award Year: 2014
Subsidized Loans	$24,668	$2,750	$27,418
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Combined Loans	$39,388	$6,250	$45,638
Consolidation Loans, Unallocated	$2,354		$2,354
Other			
Perkins Loans	N/A		N/A

Totals section shows Undergrad + Grad

$19,768 (consol) + $2,750 (Recent) + $2,150 (Older) = $24,668

$11,220 (consol) + $3,500 (Recent) + = $14,720

Step 4

Calculation Process

Step 1: Collect Loan Data

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Step 2: Calculate Each Loan's Loan Level Aggregate OPB

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Step 3: Sum Loan Level Agg. OPBs by "Loan Type"

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Step 4: Evaluate Aggregate Totals For Eligibility

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Step 4: Evaluate Totals for Eligibility

Aggregate Loan Information

	Exceeds Undergrad Sub Limit	Close or Equal to Undergrad Comb Limit
⚠	⚠	

Loan Type	Outstanding Principal Balance	Pending Disbursements	Total
Undergraduate			Award Year: 2014 ⓘ
Subsidized Loans	$24,668	$2,750	$27,418
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Subsidized Loans	$24,668	$2,750	$27,418
Unsubsidized Loans	$14,720	$3,500	$18,220
Combined Loans	$39,388	$6,250	$45,638
Consolidation Loans, Unallocated	$2,354		$2,354
Other			
Perkins Loans	N/A		N/A

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Additional NSLDS Resources

- NSLDS for Financial Aid Professionals

  http://nsldsfap.ed.gov

- Information for Financial Aid Professionals (IFAP)

  http://www.ifap.ed.gov

- Dear Partner/Colleague Letters (e.g. Gen 03-12)

- NSLDS Newsletters (e.g. #43 for treatment of D0 loans; #41 for exclusion of cap interest from older loans; #44 for treatment of D9 loans)

U.S.Department of Education

NSLDS Contact Information

Customer Support Center:

- Phone: 1-800-999-8219
- Toll: 785-838-2141
- Fax: 785-838-2154
- Web: www.nsldsfap.ed.gov
- E-mail: nslds@ed.gov

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QUESTIONS?

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