LOSFA
LOUISIANA OFFICE OF STUDENT FINANCIAL ASSISTANCE
A PROGRAM OF THE BOARD OF REGENTS

STUDENT FINANCIAL AID BULLETIN

SFA No:	S2024-3
DATE ISSUED:	June 25, 2024
EFFECTIVE DATE:	July 1, 2024
DISTRIBUTION:	College and Proprietary Financial Aid Offices and Registrars, Louisiana Community and Technical College System Personnel. Louisiana Association of Independent Colleges and Universities Financial Aid Offices
TOPICS:	Important Notice Regarding Use of Initial vs. Reprocessed ISIR Data

In accordance with the guidance from Dear Colleague Letter **GEN-24-39**, schools and states can use their discretion to rely on the original ISIR sent, rather than the reprocessed record, for packaging and disbursing aid promptly. If the original ISIR meets the criteria outlined in **GEN-24-39**, particularly if it results in greater aid eligibility for the student, institutions are not obligated to use the reprocessed ISIR. This bulletin highlights the importance of this process and provides instructions on compliance and best practices.

Key Points:

1. Initial ISIR Data vs. Reprocessed ISIR Data:
    a. Initial ISIR Data: Information provided at the original application submission.
    b. Reprocessed ISIR Data: Updates or corrections based on original ISIR data in which in some cases, the financial information may have changed. (See **GEN 24-60** for a Summary of Issues)
2. Impact on Financial Aid Awards:
    a. A negative SAI does not increase the COA or need.
    b. The U.S. Department of Education confirms that using the original ISIR data for calculating and disbursing Title IV funding is valid, even if a reprocessed ISIR is generated. (Refer to **GEN 24-37** and GEN **24-39** for detailed guidance)
    c. If the original ISIR contains invalid information (e.g., missing or incorrect Pell Grant Eligibility Flag on a rejected ISIR), the reprocessed ISIR may be used. The reprocessed ISIR will correct the errors and potentially result in greater aid eligibility for the student.
3. Eligibility and Compliance:
    a. Institutions that choose to award and disburse Title IV aid based on the original ISIR data in these circumstances must document and maintain a record of the decision in the student file, including the original 2024-25 ISIR on which the school bases its award and the reprocessed record that demonstrates a lower amount of aid eligibility.
    b. LOSFA will make its assessments in light of these instructions and the unique circumstances in which institutions are being asked to make judgments about correct award amounts of Title IV. LOSFA will consider these challenges in assessing compliance concerns or enforcement actions.

Notification and Compliance Recommendations:

4. Notification to LOSFA:
    a. The Department of Education considers each instance where aid is awarded based on the original ISIR to be a unique situation requiring professional judgment. According to **GEN 24-39**, the decision to use the original ISIR or reprocessed ISIR must be made on a case-by-case basis.
    b. Institutions must formally notify LOSFA, in accordance with their university policy, if they opt to utilize original ISIR data universally or only on a case-by-case basis. This notification shall be documented and submitted as part of the annual packaging policy submission.
5. Audit Focus:
    a. Audits will specifically examine whether schools have notified LOSFA about their data usage preference and if they are adhering to the stated practices.
    b. Auditors will review the accuracy and consistency of financial aid awards in relation to the data utilized (initial vs. reprocessed).

For general questions, please e-mail sgsp@la.gov. For audit specific questions, please e-mail audit@la.gov.