

Loan Repayment

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U.S. Department of Education

2025 NASFAA Conference



Agenda

- Income-Driven Repayment (IDR) Plan Update
- Borrower Outreach and Tools
- Resuming Collections
- Specialty Programs
- Joint Consolidation Loan Separation Act
- Perkins Loans

IDR Plan Update

3

IDR Plan Court Actions

- A federal court has prevented the U.S. Department of Education (ED) from implementing the Saving on a Valuable Education (SAVE) Plan and other income-driven repayment (IDR) plans. ED is currently prohibited from using the SAVE formula to:
- Calculate monthly payments.
- Discharge loans after the required number payments under the SAVE, Pay As You Earn (PAYE), and Income-Contingent Repayment (ICR) Plans.



Impact of Injunction on the SAVE Plan



- The final rule of the "Improving Income Driven Repayment for the William D. Ford Federal Direct Loan Program and the Federal Family Education Loan (FFEL) Program" modified the REPAYE plan and renamed it as the SAVE Plan.
- The Feb. 18, 2025, injunction had the following impact to the SAVE Plan:
 - The Court has enjoined all provisions of the SAVE Plan
 - Includes ability to pay under SAVE if the borrower is already enrolled.
 - Prohibits new enrollments in SAVE.
 - Prohibits any forgiveness under SAVE.
 - The Court has enjoined all provisions of the precursor to the SAVE Plan, the REPAYE Plan.
 - To comply with the injunction, any borrower who was enrolled in SAVE, applied for SAVE, or selected "Lowest Monthly Payment" who was placed in a general forbearance with a 0% interest rate after being placed in a 60-day processing forbearance.

Impact of Injunction to non-SAVE IDR Plans

The Feb. 18, 2025, injunction now means that:

- Borrowers who file their taxes as Married Filing Separate (MFS) or are married without access to their spouse's income must include their spouse in the family size for determining the monthly payment amount even though the spouse's income is not included in the formula.
- The only deferment that will count as progress towards forgiveness is the Economic Hardship Deferment. There are not any forbearances that will count as progress towards forgiveness.
- Forgiveness under ICR and PAYE is suspended. Forgiveness under IBR is temporarily suspended while we make adjustments to the deferments and forbearances that count as progress towards forgiveness.

Actions Taken to Comply with Injunction

Month	Action
February 2025	ED received a revised injunction that enjoined the entire final rule on "Improving Income Driven Repayment for the William D. Ford Federal Direct Loan Program and the Federal Family Education Loan (FFEL) Program". The prior injunctions only enjoined parts of the final rule.
February 2025	Temporarily removed both the online and the paper/pdf IDR application from StudentAid.gov to bring the application into compliance with the injunction. Servicers temporarily suspended processing of IDR applications while updating their systems to be compliant with the injunction.
March 2025	ED launches an injunction-compliant version of the IDR application in both online and paper formats
April 2025	Servicers begin processing IDR applications not impacted by the injunction
April 2025	ED updates Loan Simulator to properly evaluate for eligibility and to properly calculate Monthly Payment Amounts using the injunction-compliant logic
April 2025	ED launches an injunction-compliant version of the online IDR application that is fully integrated with FTI to calculate Monthly Payment Amounts in real-time for the borrower
April 2025	ED temporarily removes the IDR payment counters, which are not injunction-compliant, from StudentAid.gov
May 2025	Servicers' systems are updated and are processing all IDR applications with injunction-compliant logic

Current State of "SAVE Borrowers"

Repayment Plan Enrollment	Impact to Repayment	Forbearance Count Towards PSLF	Interest Accrual During Forbearance
Borrowers enrolled in SAVE -AND- Have not applied for another IDR Plan	Payments are currently suspended, and the loan is in a general forbearance. These borrowers are permitted to apply for another IDR Plan.	No	No
Borrowers enrolled in SAVE who were required to recertify -AND- Have not applied for another IDR Plan	Payments are currently suspended, and the loan is in a general forbearance. The certification date was extended by one year to be no earlier than Feb. 1, 2026. These borrowers are permitted to apply for another IDR Plan.	No	No
Borrowers who selected SAVE on their IDR application or selected "lowest monthly payment" on their IDR application or have loans on SAVE plus another IDR Plan -AND- Have NOT yet applied for another IDR Plan.	Upon receipt of the application, payments are suspended as the borrower is placed in a one-time processing forbearance for up to 60 days and then a general forbearance. ED is no longer processing existing applications where the borrower selected SAVE or "lowest monthly payment" as the terms described in the application have changed. These borrowers are required to reapply selecting a specific IDR plan if they want to exit the forbearance and resume payments.	General – No Processing – Yes	General – No Processing - Yes
Borrowers who are enrolled in SAVE, apply for SAVE, select "lowest monthly payment" on their IDR application or borrowers with loans on SAVE and another IDR Plan -AND- Have applied for another IDR Plan	Upon receipt of the application, payments continue to be suspended as the borrower was in a general forbearance and is now placed in a one-time processing forbearance for up to 60 days followed by a general forbearance if the application is not processed within 60 days.	General – No Processing – Yes	General – No Processing - Yes

Current State of "Non-SAVE Borrowers"

Repayment Plan Enrollment	Impact to Repayment	Forbearance Count Towards PSLF	Interest Accrual During Forbearance
Borrowers that are enrolled in IBR, PAYE, and ICR who were required to certify on or before March 17, 2025, and completed their certification	In repayment with a monthly payment amount based on their most recent certification.	N/A	N/A
Borrowers that are enrolled in IBR, PAYE, and ICR who were required to recertify after March 17, 2025 -OR- Borrowers that are enrolled in IBR, PAYE, and ICR who were required to certify on or before Mar. 17, 2025, but failed to recertify on or before Mar. 17, 2025	In repayment with a monthly payment amount based on the most recent certification prior to March 17, 2025. Recertification dates were pushed out by one year to be no earlier than February 1, 2026. Note that if a borrower was mistakenly moved to the non-hardship version of their IDR Plan, their prior monthly payment amount was reinstated.	N/A	N/A
Borrowers that apply for IBR, PAYE, or ICR before or after March 17, 2025.	Upon receipt of the application, payments are suspended as the borrower is placed in a one-time processing forbearance for up to 60 days and then a general forbearance if the application is not processed within 60 days. Borrower is then placed on the eligible plan and begins payment.	General – No Processing - Yes	General – No Processing - Yes
Borrowers that are enrolled in non-IDR plans	In repayment with a monthly payment amount based on the applicable plan's formula	NA	N/A
* Borrowers that are required to certify on or be	efore March 17, 2025, were required to submit the necessary paperwork no la	ater than February 2	20, 2025.

Automatic recertification was not available at that time but will be available for their next recertification date.

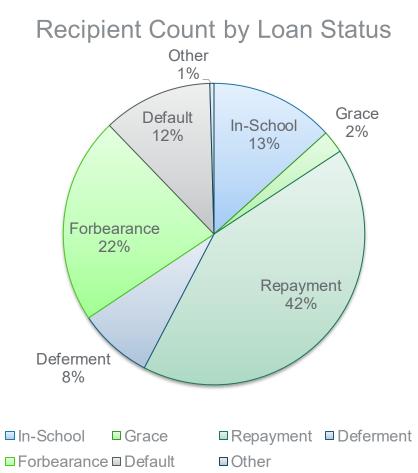
Borrower Outreach and Tools

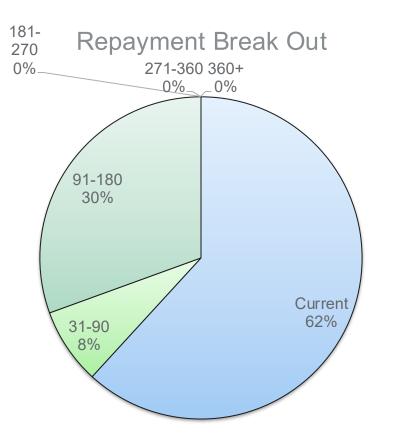
10



Status of the Federally-Serviced DL and FFELP portfolio as of March 2025.

Sourced from the FSA Data Center.



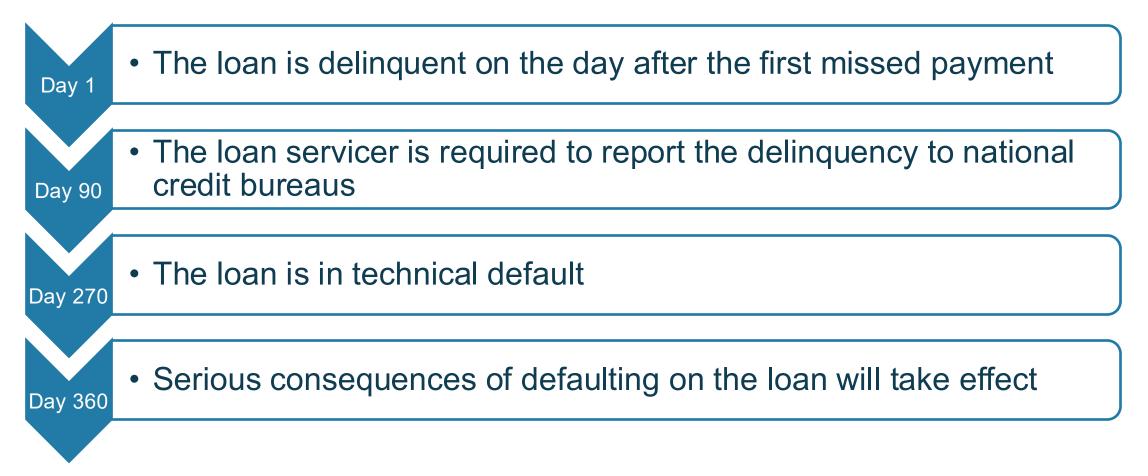


□Current □31-90 □91-180 □181-270 □271-360 □360+

Federal Student Aid

Consequences of Delinquency and Default

Days of Delinquency



Consequences of Delinquency and Default

Days Delinquent	Borrower Impact	Resolution
1 Day	No significant impacts	 Borrower can resolve delinquency by making a payment or requesting a deferment or forbearance
90 Days	Delinquency reported to national credit bureaus	 Borrower can resolve delinquency by making a payment or requesting a deferment or forbearance
270 Days	 Borrower is no longer eligible for additional <i>Title IV</i> aid Loss of eligibility for PSLF 	 Borrower can resolve delinquency by making a payment or requesting a deferment or forbearance
360 Days	 No longer eligible for deferments, forbearances, or to chose a repayment plan Loan's full unpaid balance, including principal and interest, is immediately due Default is reported to the national credit bureaus Loan is subject to Treasury Offset Program, which means that funds can be withheld from tax refunds and other federal benefits paid to the borrower Loan is subject to administrative wage garnishment, which means that funds can be withheld from a borrower's paycheck Borrower may be charged collection fees, attorney's fees, and other costs associated with the collection process 	 Default can only be resolved by rehabilitation, consolidation, or payment in full.

Consequences of Delinquency and Default

Once defaulted (360 days), borrowers are limited in how they can remove themselves from default:

- Loan Rehabilitation
- Loan Consolidation
- Payment in Full

There are limitations and important details to consider for loan rehabilitation and loan consolidation. Visit **StudentAid.gov/enddefault** to learn about both these options.

Benefit Regained	Loan Rehabilitation	Loan Consolidation
Eligibility for Deferment	Yes	Yes
Eligibility for Forbearance	Yes	Yes
Choice of Repayment Plans	Yes	Yes
Eligibility for Loan Forgiveness Programs	Yes	Yes
Eligibility to Receive Federal Student Aid	Yes	Yes
Removal of the Record of Default From Your Credit History	Yes	No
nterest and Collection Costs Are Added	No	Yes

Borrower Outreach by ED

- Beginning on April 23, 2025, ED initiated the first in a series of borrower email campaigns that will continue for multiple months:
 - Borrowers with loans in default
 - Borrowers who are at least 60 days delinquent but not yet defaulted
 - Borrowers in good standing
 - Borrowers currently in the SAVE forbearance
 - Borrowers who selected "Lowest Monthly Payment Amount" or "SAVE" on a pending IDR application

Borrower Outreach by Institutions

- The Secretary urges each participating institution to provide the following information to all borrowers who ceased to be enrolled at the institution since Jan.
 1, 2020, and for whom they have contact information:
 - Remind the borrower that he or she is obligated to repay any federal student loans that have not been repaid and are not in deferment or forbearance;
 - Suggest that the borrower review information on StudentAid.gov about repayment options; and
 - Request that the borrower log into StudentAid.gov using their StudentAid.gov username and password to update their profile with current contact information and ensure that their loans are in good standing.
- The Department urges that this outreach be performed no later than June 30, 2025.

Social Media

Sade

Federal Student Aid 🤣 @FAFSA · Apr 4 Ø ... If you don't make your scheduled student loan payments for at least 270 days, you're considered to be in default. If this applies to you, then you may have received a letter from the Bureau of Fiscal Service about an upcoming treasury offset. Follow these steps to prevent it! Show more







Federal Student Aid

Don't wait for the consequences of default to start. If your student loans are in default, these options can help.

Federal Student Aid 🎡

@FAFSA

Ficked Stockers Ald



3:18 PM - May 8, 2025 - 4,729 Views

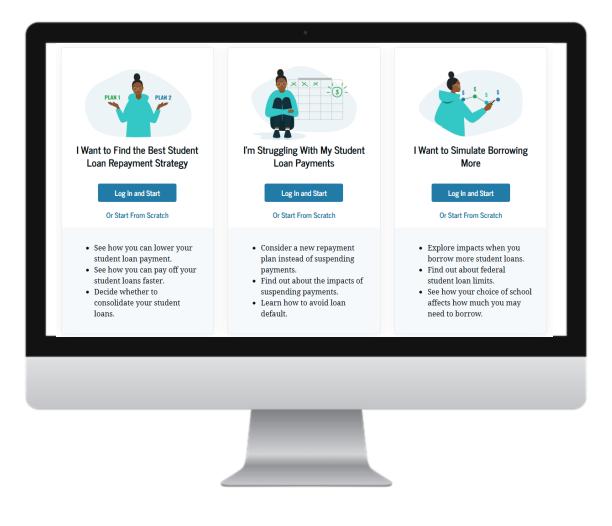
Missed a student loan payment? Make sure it doesn't become a larger problem down the road. If you're struggling with your payments, your loan servicer can help: StudentAid.gov/manage-loans/l...

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Borrower Tools

Loan Simulator

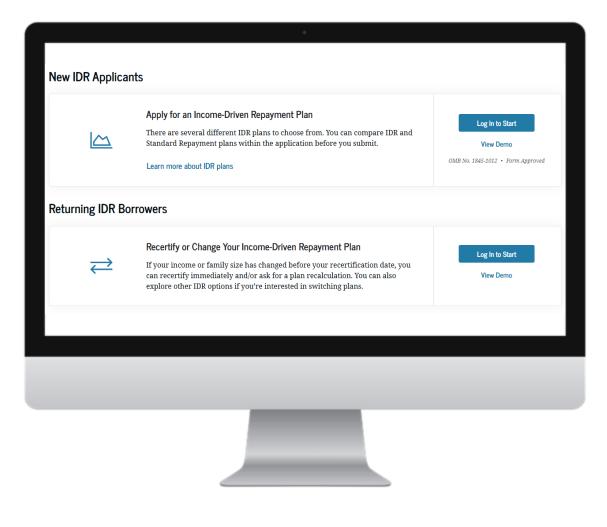
- Updated to accurately reflect repayment plan availability.
- Updated to accurately determine borrower eligibility for each repayment plan.
- Updated to accurately estimate monthly payment amounts for borrowers in certain tax filing situations.



Borrower Tools

IDR Application

- Updated to determine the borrower's eligibility for specific IDR Plans.
- Updated to use Federal Tax Information (FTI) to generate a monthly payment amount for Direct Loan borrowers.
- Back-end processes will be updated so that recertification is automatic for Direct Loan borrowers that provide consent.



Borrower Tools

Aidan

- Aidan provides FSA customers (students, borrowers, and their families) with quick access to information about federal student aid.
- Aidan uses advanced technology to answer most common questions about federal student aid such as finding a borrower's current loan account balance, learning more about grants, or getting help contacting a student loan servicer.
- In March 2025, FSA improved Aidan's technology by leveraging artificial intelligence to improve Aidan's responses to customer questions.
- FSA has seen notable improvements on our customer service including a significant increase in Aidan's ability to resolve questions, so FSA customers do not have to reach out to a call center.

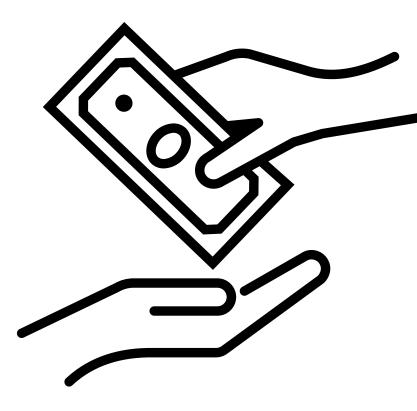


Resuming Collections

21



Resuming Involuntary Collections



On Monday, April 21, 2025, the Department announced that involuntary collections activity on the defaulted portfolio will resume:

- Treasury Offset Payments resumed on Monday, May 5, 2025
- Wage Garnishment is scheduled to resume in August 2025

The Department also authorized guaranty agencies to begin involuntary collections activities on loans under the Federal Family Education Loan Program (FFELP). **Specialty Programs**

23

Public Service Loan Forgiveness (PSLF)

As of July 1, 2024, the Department fully manages the PSLF program through StudentAid.gov

- With the updates to our systems and processes, borrowers can now manage their progress toward forgiveness under PSLF on StudentAid.gov from start to finish.
- This includes
 - Submitting a PSLF form,
 - Monitoring the status of a PSLF form on the My Activity section of the borrower's StudentAid.gov account,
 - Retrieving correspondence relating to the PSLF form, and
 - Accessing payment counts and certified employment on My Aid section of the borrower's StudentAid.gov account.



Federal Student Aid

PSLF Status on My Activity

The borrower can view updates in the **Status Tracker** within **My Activity**. This page is organized into:

- **1. Current form status** at the top of the page (a colored pill displays the status)
- 2. Form Information section, which provides an overview of the PSLF form submitted by the borrower
- **3. Status Tracker**, which tells the borrower the current state of the form and any actions they may need to take
- **4. Recommended Actions** that may help the borrower maximize their PSLF benefits (e.g. switching to an income-driven repayment plan)

PSLF Form		
Action Required		Have employer sign electronically
Form Information	2	
Employer Name Peace Corps	Signature Method Manual	Employer Email N/A
	Show More \sim	
Status Tracker 3		Created on Jan 26 2023
		4 You have 5 loans currently ineligible for PSLF View Recommended Actions →
Employer Eligibili Completed on Jan 26 20. Our system has an	ty Review 23 utomatically determined that your employer is eligible for PSLF.	More Resources
No manual review Jan 26 2023 E Submit Your Sign	imployer eligibility review complete. Employer is pre-approved for PSLF.	Apply for Loan Consolidation Apply for an Income-Driven Repayment Plan
- T	status.tracker.detail.manualCompleted	Explore Your Repayment Options
Download Unsig	gned Form OR Have employer sign electronically	Submit Another PSLF Form
How to submit you	r signed form:	Learn About PSLF/TEPSLF
Direct Upload	Upload an electronic version of your manually signed form to the PSLF Servicer's Website [2] Please note, this process is slower than submitting an electronic form.	Learn about the PSLF Waiver
Mail	U.S. Department of Education/MOHELA 633 Spirit Drive Chesterfield, MO 63005-1243	
Fax	(866) 222-7060	
Jan 26 2023 P	SLF form Submitted for manual employer signature	

PSLF Progress on My Aid

Borrowers are able to view the details of payment history by selecting **Payment History** at the top of the page.

Borrowers can view the following while on the payment history page:

- Loan Type
- Payment period
- Payment status
- Details

Note: The borrower's loan payment status will be one of the following:

- Employment not certified
- Ineligible
- Qualifying

oan Details Payment History	Employment Certification	PAYMENT ELIGIBILITY	PSLF & TEPSLF PSLF Only (i)
Filter 1-10 of 100 payments			
Loan	Payment Period	Payment Status	Details
1 - DL Consolidation Subsidized Loan	07/2022	O Employment Not Certified	View Details \sim
2 - DL Direct Loan	07/2022	O Employment Not Certified	View Details \sim
3 - DL Consolidation Subsidized Loan	07/2022	O Employment Not Certified	View Details \sim
6 - DL Consolidation Subsidized Loan	07/2022	O Employment Not Certified	View Details \sim
7 - DL Consolidation Subsidized Loan	07/2022	Ineligible	View Details \sim
1 - DL Consolidation Subsidized Loan	06/2022	Ineligible	View Details \sim
2 - DL Direct Loan	06/2022	Ineligible	View Details \sim
3 - DL Consolidation Subsidized Loan	06/2022	Qualifying	View Details \sim
6 - DL Consolidation Subsidized Loan	06/2022	Qualifying	View Details \sim
7 - DL Consolidation Subsidized Loan	06/2022	Qualifying	View Details ~
	< Previous 1 2	3 4 5 Next >	

Total and Permanent Disability

The Department fully manages the TPD program on StudentAid.gov

- As of March 23, 2025, borrowers can submit applications and physicians can complete their portion of the application electronically.
- Institutions with a Perkins portfolio must adjust their SAIG services to include TPD.
- Institutions should send Perkins transfers to Nelnet.

If you get a Total and Permanent Disability (TPD) discharge, you won't have to repay the following loan types:

- William D. Ford Federal Direct Loan (Direct Loan) Program loans
- Federal Family Education Loan (FFEL) Program loans

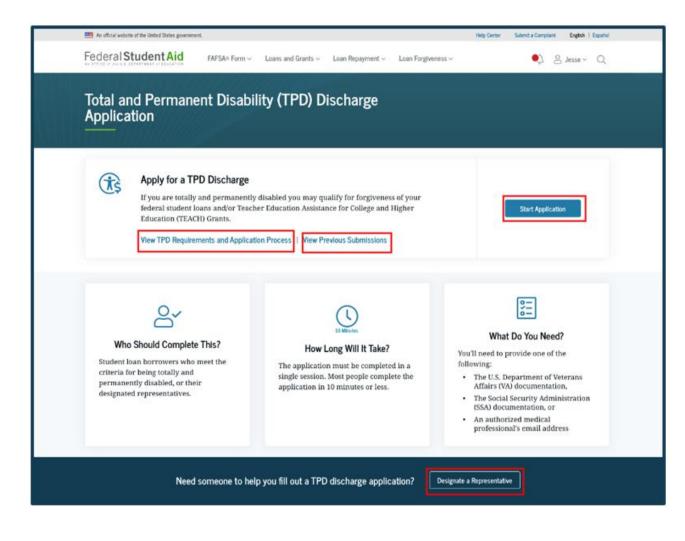
Sederal Perkins Loans

If you received a TEACH Grant, a TPD discharge also relieves you of your TEACH Grant service obligation.

Total and Permanent Disability

TPD Application Landing Page

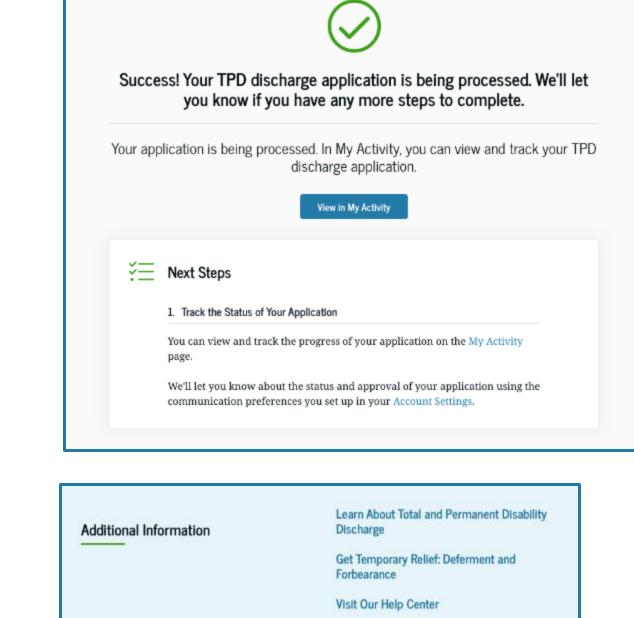
- **Start Application:** Borrowers can start a new application, and view information related to the TPD program including information about the application process and what is required to apply.
- View Previous Submission: Links the borrower to My Activity once they are authenticated to view previous TPD application.
- **Designate a Representative:** Takes the borrower to a form on which they can designate a representative to help them complete a TPD discharge application.



Total and Permanent Disability

Next Steps

- After submitting their application, applicants will be able to review their next steps. This information will also be available via email.
- The next steps will include links to additional information such as the Help Center.
- All applicants will be able to access their application and track the status of their application in My Activity.
- The next steps will vary based on the application.



29

Total and Permanent Disability

Next Steps

For applications where an applicant has selected an electronic signature, the next steps may include adding the medical professional's email address or notifying them that an email will be sent.

ou're almost done! Your TPD discharge application is complete, but your medical professional's signature is required for submission.	You're almost done! Your TPD discharge application is complete your medical professional's signature is required for submission
request for your medical professional to electronically sign your application has been sent to drjohanas@med.com.	Use the My Activity page to add your medical professional's email address to an electronic signature request or choose another method to sign the for
Use the My Activity page to track your application, change signature methods, and download documents.	View in My Activity
View in My Activity	š → Next Steps
	1. Add Your Medical Professional's Email Address
Next Steps Notify Your Medical Professional	Reach out to your authorized medical professional's office to obtain their email address. Once you have it, add the email to your application in My Activity.
Tell your authorized medical professional to expect an email sent from DocuSign (dse_NA4@docusign.net) on behalf of the Department of Education's office of Federal Student Aid.	Your medical professional has 60 days to electronically sign your application. If they do not electronically sign within 60 days, your application will convert to a manual submission, and you will have 30 days to print and obtain the medical professional's physical signature.
Your medical professional has 60 days to electronically sign your application. If they do not electronically sign within 60 days, your application will convert	2. Notify Your Medical Professional
to a manual submission, and you will have 30 days to print and obtain the medical professional's physical signature.	Tell your authorized medical professional to expect an email sent from DocuSign (dse_NA4@docusign.net) on behalf of the Department of Education's office of Federal Student Aid.
2. View and Track Your Application	3. View and Track Your Application
Once your authorized medical professional signs your application, we'll start to process it. You can view and track the progress of your application on the My Activity page.	Once your medical professional signs your application, we'll start to process it. You can view and track the progress of your application on the My Activity page.
We'll let you know about the status and approval of your application using the communication preferences you set up in your Account Settings.	We'll let you know about the status and approval of your application using the communication preferences you set up in your Account Settings.

Tectoral Student

TEACH Grants

The Department now fully manages the TEACH Grant program on StudentAid.gov

- Recipients can complete and sign their TEACH Grant Certification of Qualifying Teaching electronically.
- Chief Administrative Officers can complete their portion of the certification form electronically.
- Recipients can follow their progress towards fulfilling their obligation on StudentAid.gov.

The U.S. Department of Education has resumed processing for TEACH Grants

Now, when you log in to your account on StudentAid.gov, you can

- complete your TEACH Grant qualifying teaching service cartification forms at StudentAid.gov/teach-certification;
- digitally sign, have your school's certifying official cigitally sign, and submit your form; and
- view the status of certifications for both undergraduate and graduate TEACH Grants in the My Activity section of your StudentAid.gev Deshboard.

This means a more streamkined process for menoging your TEACH Grant, allowing you to complete your entire TEACH Grant qualitying basching service form online (instead of by mul).



TEACH Grants

Complete Your TEACH Grant Certification Form

You can certify your qualifying teaching service by filling out the TEACH Grant certification form. Select the "Log In To Start" button on the right to start filling out your form.

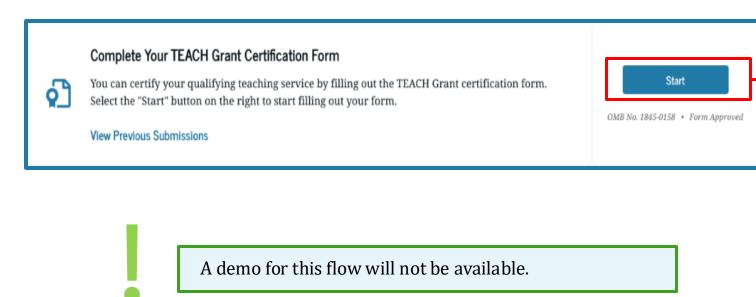
Log In To Start

OMB No. 1845-0158 . Form Approved

UNAUTHENTICATED VIEW

View Previous Submissions

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AUTHENTICATED VIEW

The recipient must be a full-match authenticated user with TEACH Grants to access the flow.

If the recipient does not have TEACH Grants, they will be shown that they are not able to access the flow.

Joint Consolidation Loan Separation Act

Joint Consolidation Loan Separation Act

The Joint Consolidation Loan Separation Act:

- Allows joint consolidation loan (JCL) borrowers to separate their JCL and consolidate individually into Direct Consolidation Loans.
- Two types of applications:
 - Joint application requires both co-borrowers to apply to each receive individual Direct Consolidation Loans.
 - Separate application only requires one co-borrower to apply but must be due to experiencing domestic violence or economic abuse by the other co-borrower or cannot reasonably access the other co-borrower's loan information. Only the borrower that applies receives a new Direct Consolidation Loan.

Joint Consolidation Loan Separation Act

Separation Amounts and Interest Rate:

- Each co-borrower's portion of the JCL will be equal to the current outstanding balance multiplied by the percentage originally attributed to each individual borrower with one exception:
 - Joint applicants can submit a divorce decree, court order, or separation agreement outlining a non-proportional amount.
 - Separate applications are always a percentage originally attributed to each borrower.
 - The interest rate of the new Direct Consolidation Loan will be the same as the JCL as of the day before the resulting Direct Consolidation Loan was made.

Joint Consolidation Loan Separation Act

Application & Processing Timeline:

Date	Action
Oct. 11, 2022	The Joint Consolidation Loan Separation Act was signed into law.
Oct. 31, 2024	The Combined Application to Separate a Joint Consolidation Loan and a Direct Consolidation Loan Promissory Note became available.
Dec. 31, 2024	Application processing began.
June 30, 2025	 JCL borrowers have until June 30, 2025, to apply for separation to receive: The payment count adjustment if they had a FFEL JCL and did not receive this benefit already; and The Limited PSLF Waiver if they performed the required steps by October 31, 2022.
July 1, 2025 and beyond	Borrowers can submit applications after June 30, 2025, but will not be eligible for the payment count adjustment or the Limited PSLF Waiver.

Perkins Loans

37



Reminders for Institutions with a Perkins Loan portfolio

- Accounting Reminders
- Ensure reporting to NSLDS
- Ensure NSLDS matches the data submitted for assignment
- Conduct oversight of the work performed by a third-party
 Perkins Loan Servicer

Accounting Reminders

- Institutions are responsible for maintaining a Perkins Loan program accounting system, with ledger accounts and financial records that reflect and identify each Perkins Fund transaction.
- Institutions must record proper journal entries for the receipt and expenditure of their Perkins Fund cash.
- The institution's Perkins program accounting records must provide a clear audit trail that makes it possible to trace all program cash.
- Institutions must reconcile their Perkins accounting records and correct any discrepancies on a regular basis.



Accounting Reminders

- Institutions should be using their Perkins program accounting records to complete Part III, Section A of the FISAP each year.
- While institutions may use a third-party servicer's data to assist with reconciliation of their accounts, the data for completing Part III, Section A of the FISAP should come from the school's balanced and reconciled Perkins accounting records, not a third-party servicer.
- Schools should see Volume 4, Appendix A of the FSA handbook if they have any questions about their Perkins loan program accounting responsibilities.



Ensure proper reporting to NSLDS

- Schools must regularly review and reconcile their open Perkins Loan records in NSLDS against their internal records or those maintained by their servicer.
- The NSLDS Perkins Portfolio Report (PRKPF1) is now the primary tool schools should use for this purpose. The Portfolio Report provides a comprehensive view of all Perkins loans associated with the school, including both school-held and federally held (assigned) loans. This allows a school to compare a borrower's school-held open loan to any federally-held loans for that borrower and determine if the school-held open loan is a duplicate or erroneous loan record.
- Schools must make sure all open loans on NSLDS are reported on each month and that the open loan records on NSLDS match the school's open loan records.



42

Perkins Loan Reminders

Ensure NSLDS matches the data submitted for assignment

- The creation of duplicate loan records in NSLDS is an ongoing issue.
- While regular reconciliation and correction of discrepancies in NSLDS can help minimize the problem, schools must ensure that the loan data in NSLDS matches the data they submit with each loan assignment.
- If discrepancies exist, a school should correct them in NSLDS before submitting the loan for assignment.



43

Perkins Loan Reminders

Conduct oversight of the work performed by a third-party Perkins Loan Servicer

- Institutions that utilize a third-party servicer for servicing Perkins loans must retain full oversight and remain responsible for the accurate reconciliation and management of their Perkins loan records in NSLDS.
- Institutions, not their third-party servicer, are responsible for the accurate recording of Perkins Fund cash transactions and for maintaining proper Perkins program accounting records.

