

# Payment Integrity Scorecard

**Program or Activity**  
William D. Ford Federal Direct Loan Program

**Reporting Period**  
Q2 2026

**FY 2025 Overpayment Amount (\$M)\***  
**\$208**

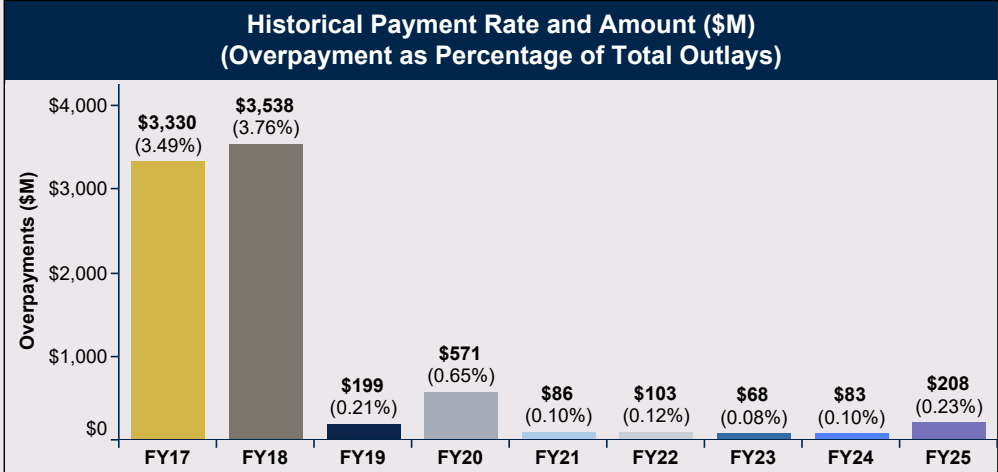
\*Estimate based a sampling time frame starting 10/2023 and ending 9/2024



**ED**  
William D. Ford Federal Direct Loan Program

**Brief Program Description & summary of overpayment causes and barriers to prevention:**

The Direct Loan program, added to the Higher Education Act of 1965 by the Student Loan Reform Act of 1993, authorizes ED to make loans through participating schools to eligible undergraduate and graduate students. Root causes of Direct Loan overpayments include, but are not limited to, incorrect calculation of Return of Title IV funds, failure to return unclaimed credit balances to ED, and failure to meet satisfactory academic progress. Barriers include the program structure which requires that funds pass through an intermediary non-federal entity before reaching the student. The HEA provides FSA authority to require the third-party to implement certain internal controls or mitigation strategies, and FSA exercises this authority.



**Discussion of Actions Taken in the Preceding Quarter and Actions Planned in the Following Quarter to Prevent Overpayments**

In Q2, FSA continued to socialize and monitor submissions of the 2026-27 Free Application for Federal Student Aid (FAFSA) that utilizes the Federal Tax Information (FTI) Module (FTIM). FTIM is a FSA system designed to ensure data security and compliance with IRS Publication 1075 requirements. FSA will continue to make additional improvements to the FAFSA form and processes; produce and update resources for families, institutions, counselors, and financial aid professionals; and keep the field updated on progress. FSA published and delivered in Q2 and will continue to publish and deliver in Q2 free trainings, guidance, and resources for school administrators to target the root causes of IPs. For example, FSA held the 2026 FSA Training Conference from March 4, 2026 to March 6, 2026. This training featured keynote addresses, general sessions, breakout sessions, and virtual exhibit hall stations for financial aid professionals. FSA also provided several webinars that focused on policy updates, regulatory changes and operational guidance from the Department of Education. The trainings were recorded and can be accessed anytime on the FSA Training Center site. FSA also publishes notices of regulatory changes in its Knowledge Center, such as March 2026 publication for the final regulations effective July 1, 2026 on the return of Title IV, HEA funds (R2T4) (90 FR 470). These final regulations make several changes to the R2T4 requirements in section 484B of the HEA, as amended.

Accomplishments in Reducing Overpayment		Date
1	ED published guidance and information regarding Title IV aid disbursement reporting, excess cash, and reconciliation requirements. This publication is to assist financial aid and business offices at institutions in meeting applicable requirements.	Jan-26
2	ED published Volume 5 of the 25-26 Federal Student Aid handbook on withdrawals and Return of Title IV funds. This guidance describes how schools should manage Title IV funds when a student completely withdraws from a payment or enrollment period.	Jan-26
3	ED announced it will host live webinars for school partners to answer questions and provide updates related to the implementation of the One Big Beautiful Bill Act so financial aid administrators and partners can continue to meet requirements.	Apr-26

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Goals towards Reducing Overpayments	Status	ECD	Recovery Method	Brief Description of Plans to Recover Overpayments	Brief Description of Actions Taken to Recover Overpayments
1 In Q2, FSA continues to implement and monitor usage of the FUTURE Act Direct Data Exchange (FA-DDX) to import U.S. income and tax information to the FAFSA Form. Direct access to income and tax information is expected to continue to reduce improper payments due to misreported income on the FAFSA.	On-Track	Sep-26	1 <b>Recovery Activity</b>	ED will continue to use a system of oversight to help detect and recover improper payments and ensure compliance by participating parties. ED will establish accounts receivable and pursue collection for improper payments identified and deemed collectable.	For improper payments identified through oversight activities, in Q2 ED monitored accounts receivable and pursued collection for those deemed collectable. FSA will continue to track the overpayments collected and report the information in the year-end OMB Data Call.
			2 <b>Recovery Activity</b>	Perform program reviews of schools for eligibility, financial responsibility, and administrative capability requirements. If applicable, FSA will assess the school a monetary liability, identify action(s) schools must take to resolve the IP, and pursue collection.	For overpayments identified through program reviews, in Q2 ED monitored accounts receivable and pursued collection for those receivables deemed collectable. FSA will continue to track the overpayments collected and report the information in the year-end OMB Data Call.
2 In Q2, FSA delivered various free trainings, guidance, and resources for school financial aid administrators to target and mitigate the root causes of IP. For example, FSA held the 2026 FSA Training Conference from March 4, 2026 to March 6, 2026. FSA also has a dedicated platform for statutory and regulatory training and guidance, webinars, and general training that covers a variety of topics related to Title IV program compliance.	On-Track	Sep-26	3 <b>Recovery Activity</b>	Review Single Audits. Schools are required to develop CAPs for deficiencies. FSA will review & evaluate the school's CAPs. If applicable, FSA will assess the school a monetary liability, identify action(s) schools must take to resolve the IP, and pursue collection.	For overpayments identified through compliance audits, in Q2 ED monitored accounts receivable and pursued collection for those receivables deemed collectable. FSA will continue to track the overpayments collected and report the information in the year-end OMB Data Call.

Amt(\$)	Root Cause of Overpayment	Root Cause Description	Mitigation Strategy	Brief Description of Mitigation Strategy and Anticipated Impact
\$208M	Overpayments that occurred because of a Failure to Access Data/Information Needed.	Incorrect processing of Direct Loan refunds or Family Federal Education Loans (FFEL) to Direct Loan Consolidations by FSA's loan servicers.	Training - teaching a particular skill or type of behavior; refreshing on the proper processing methods.	FSA will continue to offer training, resources, and guidance. FSA anticipates these activities to continue to produce estimates within FSA's tolerable IP band. FSA anticipates reduction in servicer-related IP over time.
		Incorrect processing of student data by institutions; student account data changes not applied/processed correctly; satisfactory academic progress not achieved; incorrectly calculated return of student aid funds; and processing errors by servicers.	Training - teaching a particular skill or type of behavior; refreshing on the proper processing methods.	FSA will continue to offer training, resources, and guidance. FSA anticipates these activities to continue to produce estimates within FSA's tolerable IP band. FSA anticipates reduction, but IPs cannot be fully eliminated since payments are outside of FSA's direct control.