To ensure accurate reporting of Disbursement dates to COD, Arnold's will follow the COD reporting Procedure.

Procedure

- 1) Institution must ensure student meets eligibility requirements
- 2) For Direct Loans- Borrower's eligibility for a loan, loan amount, anticipated and actual dates of disbursement must be reported to the Secretary.
- 3) For Federal Pell Grants- student payment data will be submitted in accordance with procedures and deadlines published in Federal Register
- 4) When the COD disburses Title IV, HEA Funds, Arnold's will disburse funds to the student's ledger account the same day, then document the dates and amounts in the student's file.
- 5) These dates will be reconciled monthly with NSAS.