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Oracle Student Financial Aid

Update 26B Spotlight

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Hello, I am Desiree Dreszer, Director of Product Management on the Oracle Student Financial Aid team, and in this spotlight I will be reviewing the updates that we are delivering in 26B.

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One Big Beautiful Bill Impacts to SFA

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Let's start with a quick overview of what we'll cover in the 26B spotlight.

First, we'll walk through the impact of the One Big Beautiful Bill on Student Financial Aid—what's changing and why it matters to you, our customers.

Next, we'll review the release strategy for 26B, including timing, rollout approach, and what you can expect from a delivery perspective.

And finally, we'll go through the key contents of the 26B release, highlighting the most important capabilities being delivered.

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With that, let's start with the impact.

One Big Beautiful Bill Act

Major regulatory overhaul, significant operational changes, and complex institutional implementation challenges impact student financial aid nationwide.

OBBA was signed into law on July 4th, 2025 and introduces significant new provisions impacting Title IV Pell and Direct Loans for the 2026-2027 award year (effective July 1, 2026).

The One Big Beautiful Bill Act introduces a significant shift for student financial aid.

Signed into law in July 2025, it impacts Title IV programs—especially Pell Grants and Direct Loans—starting with the 2026–2027 award year.

These changes are broad and operationally complex, and it's important to note that Department of Education guidance is still evolving.

As a result, institutions need to be prepared to adapt as requirements continue to take shape.

**Massive,
Highly
Disruptive,
Unclear,
Late, Change**

**OBBB Impacts to
Student Financial Aid**

**Requiring Updates to
94% of Product
Modules**

SAIG

New 2026-27 ISIR Format

Support mid year new ISIR format with new fields and values including record layout renumbering to support added OBBB data.

New NSLDS Format

Ability to load new NSLDS format with OBBB fields to support packaging . Added configurability in validating timeliness of NSLDS data when awarding.

New COD Schema

Process of COD files for the 2026-27 award year, in accordance with the ED Common Record XML Schema Version 5.0d including new OBBB requirements.

Pell & Non-Federal Funds

Full Cost of Attendance (COA) Scholarship & Grant Exclusion

Implement configuration to set proper priority between Pell Grants and other types of grants/scholarships to ensure they do not exceed COA.

Workforce Pell Program

Ability to identify eligible programs and automate ISIR corrections, then package students with Workforce Pell and report tuition and fees to COD

Direct Loans

Loan Limit for Less Than Full Time Enrollment

Update loan packaging logic to prorate annual loan limits proportionally for students enrolled less than full-time.

Loan Limit Exception

Flag and package Direct Loans under interim exception rules for qualified borrowers enrolled before July 1, 2026, using prior loan caps for expected time to credential.

Elimination of Graduate PLUS Loan

Remove the Graduate PLUS Loan option from packaging for loans disbursed after July 1, 2026.

Parent PLUS Loan Limits

Update eligibility calc and tracking for new Parent PLUS annual (\$20,000) and aggregate (\$65,000) borrowing caps across all parents per dept student.

Graduate and Professional Loan Limits

Implement tracking and enforcement for new annual & aggregate loan limits for graduate (\$20.5k /\$100k) and professional (\$50k/\$200k) students.

Federal Loan Lifetime Aggregate Limit

Apply and monitor the new \$257,000 lifetime direct loan borrowing cap, excluding PLUS loans, regardless of amounts repaid, forgiven, or cancelled.

Institutional Loan Limits

Implement configuration to reflect institutional-specific loan limits as determined by future federal guidance.



This gives you a sense of the scale and complexity of the OBBB impact.

At a high level, these changes are massive, highly disruptive, and still evolving, with late-breaking guidance continuing to shape how institutions respond. In fact, this drives updates across nearly all of our product modules.

From a functional perspective, the impact spans across the entire lifecycle: SAIG and data exchange with new ISIR formats, NSLDS updates, and COD schema changes Pell and non-federal funds, including COA controls and the new Workforce Pell program

And Direct Loans, where we see significant changes to loan limits, eligibility rules, and the elimination or restructuring of certain loan programs

The key takeaway here is that this isn't a single change—it's a broad transformation that touches nearly every aspect of financial aid processing.

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Now let's shift gears and talk about our release strategy for Update 26B.

We'll walk through how we're planning the rollout, and what you can expect in terms of timing, and how we're supporting you through these changes.

Simulate, Adapt, Go-Live with Complete Confidence

The ability to validate complete flexibility + automation with real-time simulation

Precise, Real-Time Simulation Before Affecting Students

Safely load and simulate all post 4/26 ED files in test before moving to production.

Validate data, configuration, and outcomes *before* enabling production intake, minimizing risk from unstable federal systems and evolving specs.



Seamless Portable Migration to Production

Instantly migrate fully validated TEST configurations and results to PROD with seamless automation.

Default safeguard: Oracle disables automatic production intake on 4/25, helping protect system from unvalidated data.



Engineered for Uncertainty & Rapid Change

Delivering **core capabilities first** and providing **entirely new, supremely flexible configuration frameworks** so you can **quickly adapt** to changing federal guidance and requirements.

Built for late-cycle changes: rapid updates, full transparency, and ongoing customer guidance.



Our release strategy focuses is on three key principles:

First, simulate and validate before impacting students—giving you the ability to test with real data in a controlled environment.

Second, seamless movement from test to production, so once you're ready, you can go live without disruption.

And third, flexibility to adapt, with configuration-driven capabilities that allow you to respond quickly as guidance evolves.

Ultimately, this approach is about giving you the confidence to go live—knowing your data, configurations, and outcomes are fully validated.

So with that, let's walk through how this comes to life in our phased delivery approach.

1 Pre ED Go-Live Hotfix

Targeted Prior to 4/25 into Production

Prepares for ED's April 26 go-live of updates to FPS, NSLDS, and COD, by ensuring controlled processing of incoming data and improving flexibility in awarding Title IV aid with NSLDS FAH/TSM files.

- Disable Automated 2026-27 ISIR/NSLDS Processing
- Enhanced NSLDS Date Validation for Title IV Funds

2 OB3 Initial Release

26B, Tentatively May, Working Hard for April if Possible

Enables compliance with OB3 regulations for the 2026–27 award year, with end-to-end processing across ISIR, NSLDS, COD, and Packaging, introducing new loan limits, Workforce Pell, and configuration-driven automation for awarding and reporting.

- ISIR Multi-Layout Support
- NSLDS Updates
- 2026–27 Packaging and COD Updates
- Loan Limit Exception using ED ISIR data
- Grad PLUS Elimination
- PLUS and Grad/Prof Loan Limits
- Institutional Loan Limits
- Workforce Pell Enablement
- Access to OB3B Funding Data

3 OB3 Add. Capabilities

Subsequent to Initial 26B Release

Completes remaining OB3 requirements, including advanced loan limit calculations, proration, and expanded data visibility, with select capabilities delivered pending final less-than-full-time loan limit regulations.

- Loan Limit for Less Than Full-Time Enrollment (*pending final ED policy guidance*)
- Enhanced Loan Limit Exception Management
- Parent PLUS and Grad/Prof Remaining Aggregate Loan Limits
- Federal Loan Lifetime Aggregate Limit
- Full COA Scholarship/Grant Exclusion
- Access to OB3B NSLDS Data



Before we jump into specific features, I want to briefly walk through how we're delivering OB3B functionality—because the approach here is critical to reduce risk and maintain stability.

Phase 1 is the pre-ED go-live hotfix.

This prepares for ED's April 26 go-live, where ISIR, NSLDS, and COD all introduce new formats and fields at once.

To protect your production environment during this transition:

On April 25th, we are pausing 2026–27 ISIR processing

And temporarily stopping automated NSLDS intake

This ensures unvalidated or unstable data doesn't impact your system while ED stabilizes.

At the same time, we have introduced more flexibility in how NSLDS data can be used in awarding during this period.

Phase 2 is the initial 26B release.

This delivers end-to-end support for 2026–27 across ISIR, NSLDS, COD, and packaging.

At this stage:

ISIR processing is re-enabled

COD processing begins with the new schema

NSLDS processing resumes once stability is confirmed

And most importantly, this release introduces the core regulatory capabilities—including new loan limits, Workforce Pell, and configuration-driven packaging automation.

Phase 3 is additional capabilities.

This builds on that foundation with more advanced scenarios, some of which depend on final ED guidance.

This phased approach allows us to deliver value early while continuing to adapt as requirements evolve.

Overall, this strategy is designed to:

Protect your production environment

Enable compliance as quickly as possible

And continue delivering enhancements as guidance stabilizes.

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With that, let's take a closer look at what's included in 26B.

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Foundational Data & Regulatory Readiness

- 2026–27 ISIR Multi Layout Support
- ISIR Code Updates for 2025-26 & 2026-27
- NSLDS File Layout & Processing Updates
- 2026-27 Award Year COD File Updates

Packaging & Awarding Transformation

- 2026-27 Award Year Packaging Updates
- Workforce Pell Program Enablement
- Loan Limit Exception Management

Loan Limits & Compliance Enforcement

- Elimination of Grad PLUS Loan
- Parent PLUS Loan Limits
- Graduate/Professional Loan Limits
- Institutional Loan Limit Enablement

Visibility & Decision Support

- Visibility into OBBB Funding Data



As I mentioned, this release establishes the core foundation for supporting OBBB—bringing together data, packaging, and compliance for the 2026–27 aid year.

On the left, Foundational Data and Regulatory Readiness—this is where we align to the new ISIR, NSLDS, and COD structures so you can receive and process updated federal data.

Next, Packaging and Awarding Transformation—introducing key changes to how aid is calculated and awarded, including Workforce Pell and loan limit exception management— all driven through configuration to give you flexibility as guidance continues to evolve.

On the right, Loan Limits and Compliance Enforcement—this is where we operationalize the new federal rules, including updated loan eligibility and limits.

And finally, Visibility and Decision Support—giving you insight into OBBB funding data to support informed decisions.

Lets take a deeper look now into each of these areas.

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Starting with Foundational Data and Regulatory Readiness.

2026–27 ISIR Multi Layout Support for Pre and Post OBBB

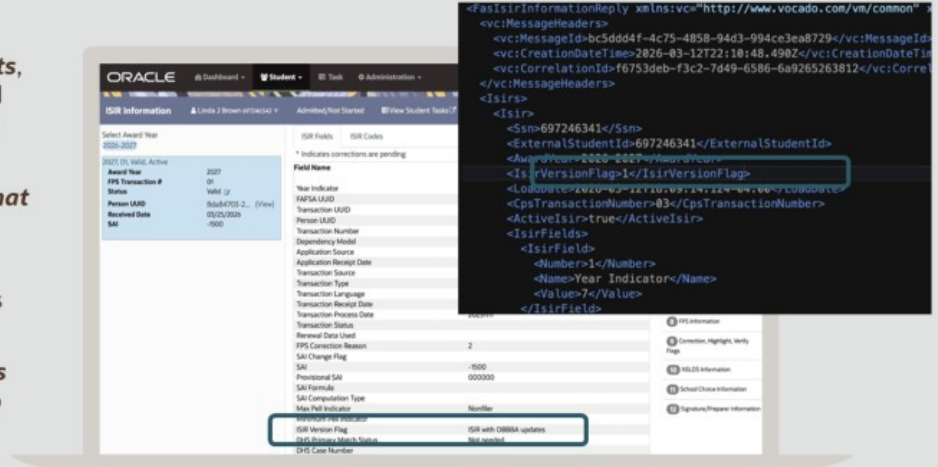
Enables institutions to seamlessly process both pre- and post-OBBB ISIR formats, ensuring continuity during mid-cycle federal changes.

Supports multiple ISIR layouts, including new OBBB fields and renumbered record structures

Automatically detects and **processes incoming ISIR format variations** without manual intervention

Preserves data integrity across transitioning federal schemas

Supports **new comment codes and ISIR corrections** added to support OBBB



One of the unique aspects of OBBB is that ISIR formats are changing mid-cycle, something we haven't seen before.

With 26B, we've built in multi-layout ISIR support to handle that seamlessly, so institutions can continue processing without disruption.

The system automatically identifies which ISIR version is being received using the ISIR version flag—available on the ISIR record and through API messages—so the correct layout and logic is applied.

The updated ISIR also includes new OBBB data elements, including Workforce Pell and data sourced from NSLDS, ensuring you have what's needed for downstream processing and awarding.

We've also added support for new comment codes and ISIR corrections, while maintaining data integrity across evolving schemas.

The end result is that you can continue operating as expected, while we handle the complexity of these changes behind the scenes.



Support ED Jan ISIR Code Updates for 2025-26 and 2026-27

Ensures compliance with updated ED reject and comment codes, improving issue resolution and user guidance.

1 New Comment Codes

New comment codes (335–338) identify missing state information for mailing addresses and require resolution

- Direct users to StudentAid.gov to update address details

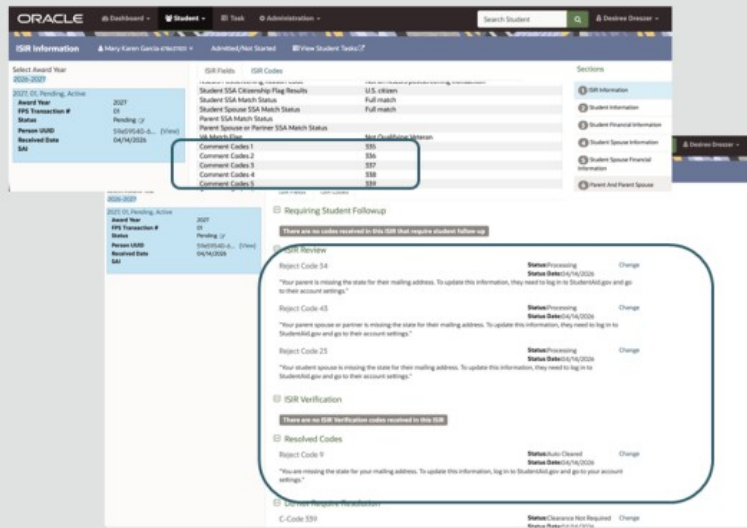
2 Updates to Comment Codes

Updates to comment codes (303, 329) improve resolution messaging; codes 292–294 retired for 2026–2027

3 Updates to Reject Codes

Reject code updates align with new comment codes and retire outdated logic

- Reject Code 6 deprecated
- Reject Codes 9, 23, 34, 43 now mapped to new comment codes (335–338)



We've also incorporated the latest ISIR comment and reject code updates from the Department of Education's January updates, which impacts both the 2025–26 and 2026–27 award years.

First, we've added new comment codes—335 through 338—to identify missing state information tied to mailing addresses, along with clearer guidance for resolution.

Second, we've made updates to existing comment codes to improve messaging and usability, while retiring codes that are no longer relevant.

And third, we've aligned reject code logic with these changes—removing outdated rules and mapping certain reject codes to the new comment codes so users get clearer, more actionable direction.

The result is clearer guidance and improved alignment with ISIR resolution requirements—helping ensure compliance across both award years.

NSLDS File Layout and Processing Updates to Support OBBB

Enhances NSLDS integration to support updated file formats with new OBBB data elements.

Expanded Applicant Detail Record (Type 1)

23 new fields and 80+ updates to support loan limit tracking, aggregate balances, and graduate/professional data

New Graduate & Professional Data Elements

Adds aggregate balances, pending disbursements, totals, and loan limit indicators

Workforce Pell Support

New indicator in Grant Payment Record to identify Workforce Pell enrollment

Field Name	Value
Unchanged Loan Limit	None
Field Flag	Yes
Graduate's Dependency Indicator	0%
Graduate Aggregate Consolidation Loans, Unallocated Outstanding Principal Balance	N/A
Graduate Aggregate Consolidation Loans, Unallocated Total	N/A
Graduate Aggregate Outstanding Principal Balance	N/A
Graduate Aggregate Pending Disbursement	N/A
Graduate Aggregate Total	N/A
Graduate Dependency Indicator	No problem
Graduate Loan Limit Flag	N/A
Graduate Remaining Amount	N/A
ISIG Change Flag	No problem
ISIG CUI Indicator	0%
ISIG Lifetime Eligibility Used	0%
Lifetime Maximum Loan Limit Flag	Exceeded Loan Limit
Lifetime Maximum Loan Total	\$21,000.00
Loan Change Flag	
Loan Limit Exception Change Flag	
Loan Limit Exception Flag	Eligible for new aggregate loan limits
Loan Limitary Repayment Arrangements Flag	No
PEL Change Flag	
PEL LRU Indicator	No problem
PEL Lifetime Eligibility Used (LEU)	0%
Perkins Current Award Year Disbursement	N/A
Perkins Total Outstanding Principal Balance	N/A
Pre-OBBB Graduate/Professional Aggregate Combined Outstanding Principal Balance	\$200.00
Pre-OBBB Graduate/Professional Aggregate Combined Pending Disbursement	\$0.00
Pre-OBBB Graduate/Professional Aggregate Combined Total	\$200.00
Pre-OBBB Graduate/Professional Aggregate Consolidation Loans, Unallocated Outstanding Principal Balance	N/A
Pre-OBBB Graduate/Professional Aggregate Consolidation Loans, Unallocated Total	N/A
Pre-OBBB Graduate/Professional Aggregate Subsidized Outstanding Principal Balance	N/A
Pre-OBBB Graduate/Professional Aggregate Subsidized Pending Disbursement	N/A
Pre-OBBB Graduate/Professional Aggregate Subsidized Total	N/A
Pre-OBBB Graduate/Professional Aggregate Unsubsidized Outstanding Principal Balance	\$200.00
Pre-OBBB Graduate/Professional Aggregate Unsubsidized Pending Disbursement	\$0.00
Pre-OBBB Graduate/Professional Aggregate Unsubsidized Total	\$200.00
Pre-OBBB Graduate/Professional Award Year	2027
Pre-OBBB Graduate/Professional Combined Loan Limit Flag	Exceeded Loan Limit
Pre-OBBB Graduate/Professional Dependency Indicator	Independent
Pre-OBBB Graduate/Professional FLOIS Outstanding Principal Balance	N/A
Pre-OBBB Graduate/Professional FLOIS Total	N/A
Pre-OBBB Graduate/Professional Subsidized Loan Limit Flag	No problem
Pre-OBBB Graduate/Professional Subsidized Loans, Unallocated Outstanding Principal Balance	N/A
Professional Aggregate Outstanding Principal Balance	\$200.00
Professional Aggregate Pending Disbursement	\$0.00
Professional Aggregate Total	\$200.00
Professional Award Year	2027
Professional Dependency Indicator	Independent
Professional Loan Limit Flag	Exceeded Loan Limit

Field Format & Position Standardization

Expanded record lengths and filler updates to support new data

Record Layout Updates Across TSM/FAH Files

Updates to Name History, Overpayment, Loan Detail, and Trailer records

In addition to the ISIR updates, we've also enhanced NSLDS file processing to support the new OBBB data requirements.

This includes updates to the Applicant Detail Record, with additional fields and expanded data to support things like loan limit tracking, aggregate balances, and graduate and professional data.

We're also supporting new data elements introduced, including indicators for Workforce Pell and additional loan-related details that are critical for packaging and compliance.

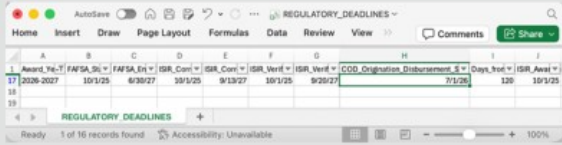
From a processing standpoint, we've standardized file formats and field positions, along with updates across TSM and FAH records—so these new data elements can be reliably received and used across downstream functions.

All of this ensures that NSLDS data is fully aligned with the new federal requirements and ready to support updated awarding and reporting.



2026-27 Award Year COD File Updates

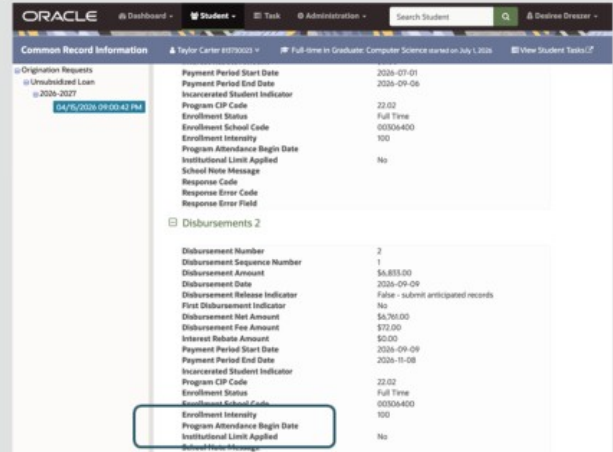
Aligns COD processing with Department of Education's updated schema to support OBBB-driven reporting and disbursement requirements.



Award Year	FAFSA_RL	FAFSA_EH	ISIR_Canl	ISIR_Canl	ISIR_Verif	ISIR_Verif	COD_Origination_Disbursement_S	Days_Hot	ISIR_Aval
2026-2027	10/1/25	8/30/27	10/1/25	8/13/27	10/1/25	9/29/27	7/1/26	126	10/1/25

Supports **origination and disbursement for 2026–27** using the COD XML Schema 5.0d including data structure updates with new elements being added

- WorkforcePellTuitionAndFees: For Workforce Pell reporting
- EnrollmentIntensity: Enables intensity-based awarding/disbursing
- InstitutionalLimitApplied: indicates when institutional limits are used
- ProgramAttendanceBeginDate: For loan limit attendance tracking
- StudentLevelCode (updated): For new graduate/professional levels



Field	Value
Payment Period Start Date	2026-07-01
Payment Period End Date	2026-09-06
Incarcerated Student Indicator	
Program CIP Code	22.02
Enrollment Status	Full Time
Enrollment School Code	00006400
Enrollment Intensity	100
Program Attendance Begin Date	
Institutional Limit Applied	No
School Note Message	
Response Code	
Response Error Code	
Response Error Field	
Disbursements 2	
Disbursement Number	2
Disbursement Sequence Number	1
Disbursement Amount	\$4,813.00
Disbursement Date	2026-09-09
Disbursement Release Indicator	False - submit anticipated records
First Disbursement Indicator	No
Disbursement Net Amount	\$4,760.00
Disbursement Fee Amount	\$72.00
Interest Rebate Amount	\$0.00
Payment Period Start Date	2026-09-09
Payment Period End Date	2026-11-08
Incarcerated Student Indicator	
Program CIP Code	22.02
Enrollment Status	Full Time
Enrollment School Code	00006400
Enrollment Intensity	100
Program Attendance Begin Date	
Institutional Limit Applied	No

Supports **receiving unrequested files in new schema** (including MPNs, Credit Decisions, and PLUS Responses).

Lastly, as part of supporting updated Department of Education data, we've aligned COD processing with the new 2026–27 schema.

This enables full support for originations and disbursements using the new COD XML 5.0d format, including the additional data elements required for OBBB.

These updates introduce key data points—such as enrollment intensity, Workforce Pell indicators, and institutional limit flags—which are critical for accurate awarding and reporting.

We also support receiving unsolicited COD responses in the new schema, including MPNs, credit decisions, and PLUS responses.

This ultimately ensures your COD processing remains aligned with federal requirements and supports the full 2026–27 lifecycle.



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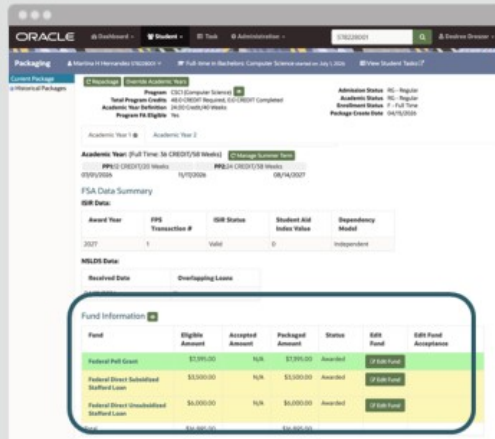


With the data foundation in place, let's now look at how this impacts packaging and awarding.

2026-27 Award Year Packaging Updates

Configurable 2026-27 packaging and awarding of Title IV and Non Federal Funds with built in agility for evolving guidance.

- Baseline configuration updated to support packaging and awarding of all Title IV funds, including 2026–27 Pell Grant values and sample Non-Federal funds
- Key updates delivered across core workbooks (FAS_FUND_CONFIG, T4_CRIT, NFR_ATTRIB) to support eligibility, awarding, and regulatory compliance
- Configurable student messaging to indicate awards may change based on evolving Department of Education guidance and legislative updates



With 26B, we've updated baseline configuration to support all Title IV funds, including new Pell Grant values, along with example non-federal funds—so you can begin packaging with the right foundation in place.

This includes updates across key configuration workbooks to support eligibility, awarding logic, and regulatory compliance, all driven through configuration.

And as guidance continues to evolve, we recommend leveraging student messaging capabilities to communicate that awards may change—helping set clear expectations during this transition period.

This gives you a configurable and adaptable packaging framework, allowing you to move forward with awarding while staying aligned with ongoing changes.

Workforce Pell Enablement

Configurable automated Workforce Pell processing from eligibility through disbursement.

ISIR Correction

Identify and correct Workforce Pell eligibility on ISIR.



Configure ISIR discrepancy to auto correct ISIRs for students in Workforce Pell programs.

Package Fund

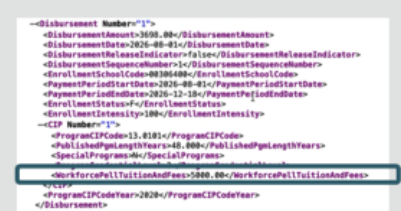
Package Workforce Pell based on corrected ISIR data.



Packaging logic will see the student is eligible for Pell and will set the Workforce Pell Tuition and Fees based on configuration.

Report to COD

Report Workforce Pell data for disbursement.



When originating and disbursing funds with COD, system will send the Workforce Pell Tuition and Fees.

Next, let's look at Workforce Pell enablement and how this comes together across the full process.

With 26B, we support automated Workforce Pell processing from eligibility through disbursement.

It starts with ISIR correction, where you can identify and correct Workforce Pell eligibility directly from the ISIR data using configurable discrepancy rules.

From there, during packaging, the system uses that corrected ISIR data to determine eligibility and automatically package Workforce Pell tuition and fees based on your configuration.

And finally, when you move into origination and disbursement, that Workforce Pell data is included in COD reporting—ensuring the correct information is sent as part of the disbursement process.

So this really provides you an end-to-end, configuration-driven flow for Workforce Pell—from identifying eligibility all the way through packaging, reporting and disbursing.

Loan Limit Exception Management

Provides enhanced control and automation for managing loan limit exceptions based on ED guidance.



Within Awarding Override Criteria configuration, logic leverages ED's loan limit exception data from ISIR.



Latest received ED data from NSLDS and COD will also be used in future state

If ED flag has not been sent in ISIR and the student's academic year begins on or after 7/1/26, data from new OB3 document is used.



Additional school criteria sent in via metadata will be leveraged in future state

New OB3 Criteria configuration will use resulting exception indicator.

- If student is eligible for loan limit exception, new loan eligibility and limits will not be applied.
- If the student is not, new loan eligibility and limits will apply.



Another key capability supporting OBBB in 26B is Loan Limit Exception Management, which provides greater control and automation when applying loan limit exceptions based on ED guidance.

There are two ways an exception can be identified.

First, through ED-provided data on the ISIR, where we leverage the loan limit exception flag directly within configurable awarding criteria.

If that flag is not present, we support a second path using the OB3 interim exception document, allowing institutions to capture and apply exception criteria based on defined rules.

In both cases, this results in a standardized exception indicator that feeds into packaging.

From there, new OB3 configuration uses that indicator to determine whether standard loan limits apply—or if the student qualifies for an exception and prior limits should be used.

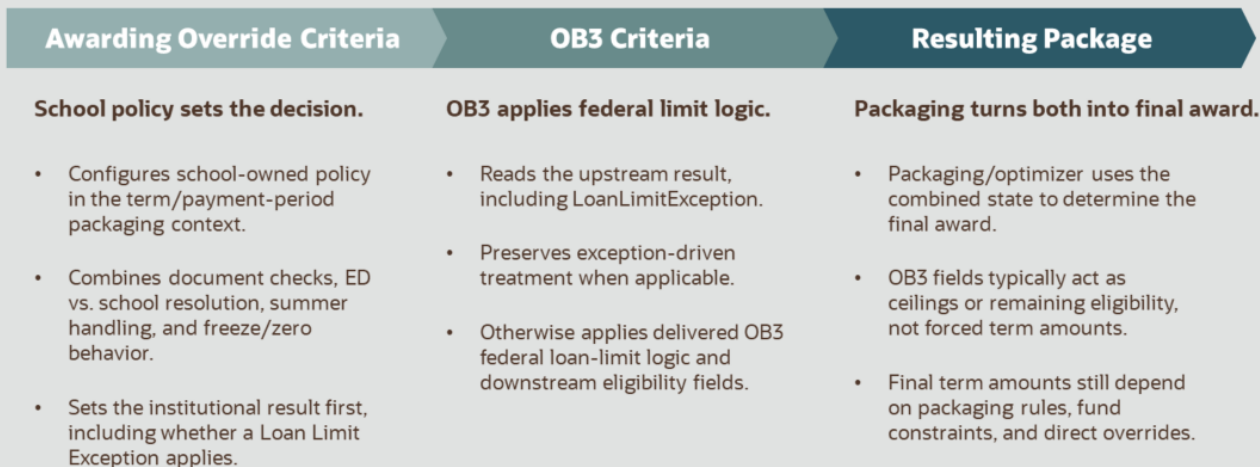
And as we continue to expand this, future releases will introduce additional eligibility criteria checks within configuration, further enhancing how exceptions are identified and applied.

This provides a flexible, configuration-driven approach to managing loan limit exceptions while staying aligned with evolving guidance.



New OB3 Criteria Configuration Script

Delivered federal intelligence that turns institutional eligibility decisions into into packaging-ready federal limits.



This slide shows how we bring together institutional policy and federal logic through the new configurable OB3 criteria framework.

Starting on the left, Awarding Override Criteria is where the institution defines its policies.

This is where you set the context for packaging—using inputs like data captured from documents, school-specific rules, and loan limit exception indicators to drive awarding decisions.

That result then feeds into a new configurable OB3 criteria, where we apply the federal loan limit logic.

This layer reads the upstream decision—like whether an exception exists—and either preserves that exception or applies the appropriate federal rules.

And finally, on the right, packaging uses both of those together to determine the final award.

OB3 configuration provides the boundaries—like limits or remaining eligibility—while packaging rules ultimately determine the final amounts.

So this framework allows you to separate institutional decisioning from federal enforcement, while bringing them together seamlessly in the final award. And by delivering this through configuration, it allows us to quickly adapt and make updates as final rules are confirmed or further changes are introduced.

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- Visibility into OBBB Funding Data



Alright now, let's shift into Loan Limits and Compliance Enforcement and how we're operationalizing these new federal requirements.

Loan Limits & Compliance Enforcement

Flexible configuration framework to quickly adapt to changing federal guidance and requirements when determining Direct Loan eligibility and loan limits impacted by One Big Beautiful Bill.

	LOAN LIMIT EXCEPTION Applies	NEW ANNUAL	NEW AGGREGATE	LOAN DATA Used
Grad PLUS Loan Elimination		---	---	---
Parent PLUS Loan Limits		\$20,000	\$65,000 per student	Data within SFA used for Remaining Aggregate
Graduate Loan Limits		\$20,500	\$100,000 or \$200,000 if prior or current professional	Remaining Aggregate not Calculated
Professional Loan Limits		\$50,000	\$200,000	Remaining Aggregate not Calculated
Institutional Loan Limits		Defined per program by Institution	---	---



This slide outlines how we're supporting loan limits and compliance enforcement under OBBB through the new OB3 configuration-driven framework I just mentioned.

At a high level, all major loan types are impacted—Grad PLUS, Parent PLUS, Graduate, Professional, and Institutional limits—with updated annual and aggregate thresholds.

You'll also see that loan limit exceptions play a key role, allowing prior limits to be applied when eligibility criteria are met.

For example:

Grad PLUS is eliminated

Parent PLUS introduces new annual and aggregate caps

And graduate and professional loans now have defined limits

We also support institutional loan limits, giving you the flexibility to define limits based on your own programs.

From an aggregate perspective, we are currently leveraging SFA data to determine remaining eligibility for PLUS loans. In future releases, this logic will also be applied to graduate and professional loans, along with expanded use of NSLDS data.

And importantly, this same framework will also be extended in upcoming releases to support lifetime loan limits along with the additional aggregate calculations.

Graduate and Professional Classification (Grade Level)

Supporting new Loan Limits with configurable control for institutional flexibility.

Grade Level Progression Config

- 1 If 2026-27 or later, and program type is graduate or professional
- 2 Check program CIP code whether to see if it meets professional requirements
- 3 If current professional program meets CIP code requirements, assign grade level of 10, else assign 8

Logic to check for prior or concurrent enrollments in SFA and/or NSLDS will be added to the grade level progression script in future state. Values 9, 12, 11, or 13 are still supported in the OB3 Criteria if institutions add logic to assign those grade levels.



Graduate Loan Limits

Within the OB3 Criteria config, if the grade level is 8, 9, or 12, and student is not eligible for loan limit exception,

- Annual limit:
 - \$20,500/year
- Aggregate limit:
 - If GL 8: \$100,000
 - If GL 9 or 12: \$200,000

Logic to check other enrollments in SFA and NSLDS to determine the remaining aggregate limits will be added in future state

OR

Professional Loan Limits

Within the OB3 Criteria config, if the grade level is 10, 11, or 13, and student is not eligible for loan limit exception,

- Annual limit:
 - \$50,000/year
- Aggregate limit:
 - \$200,000

Logic to check other enrollments in SFA and NSLDS to determine the remaining aggregate limits will be added in future state



Another important piece here is how we distinguish between graduate and professional students, since that directly drives loan limits.

Starting on the left, we use existing configurable grade level progression logic to determine whether a student should be treated as graduate or professional.

This is based on a combination of:

Award year and program type

And importantly, CIP code evaluation to identify programs that meet professional criteria

Based on that, the system assigns the appropriate grade level, which then drives loan limit eligibility.

From there, in the middle, we apply graduate loan limits for applicable grade levels—using the new annual and aggregate thresholds.

Or, on the right, if the student is classified as professional, the higher professional loan limits are applied.

The key takeaway here is that grade level becomes the driver for determining which loan limits apply—and all of this is delivered through configuration, giving institutions flexibility in how that classification is defined and applied.

And this framework will be extended to support configuration logic that evaluates SFA and NSLDS data for prior and concurrent enrollment determination in future releases.

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Foundational Data & Regulatory Readiness

- 2026–27 ISIR Multi Layout Support
- ISIR Code Updates for 2025-26 & 2026-27
- NSLDS File Layout & Processing Updates
- 2026-27 Award Year COD File Updates

Packaging & Awarding Transformation

- 2026-27 Award Year Packaging Updates
- Workforce Pell Program Enablement
- Loan Limit Exception Management

Loan Limits & Compliance Enforcement

- Elimination of Grad PLUS Loan
- Parent PLUS Loan Limits
- Graduate/Professional Loan Limits
- Institutional Loan Limit Enablement

Visibility & Decision Support

- Visibility into OBBB Funding Data



Alright finally, let's look at Visibility and Decision Support and how we're surfacing OBBB funding data.

Enhanced Visibility into OBBB Funding Data

Improves access to new OBBB-related data elements to support informed decision-making and transparency.

CATEGORY	EXAMPLES OF FIELDS	Configurable	Viewable in UI	Editable in UI	Reporting Views
Loan Limit Eligibility	Loan Limit Exception, ED Loan Limit Exception	Y	Y	N	Y
Loan Limits	Annual and Remaining Aggregate Limits, Lifetime Maximum Remaining Eligibility	Y	Y	N	Y
Institutional Controls	Program Attendance Dates, Institutional Limits	Y	Y	Y	Y
Workforce Pell	Workforce Pell Tuition & Fees	Y	Y	Y	Y
Enrollment Award Calculations	Enrollment Intensity, Pre/Post Enrollment Intensity Award Amounts	Y	Y	Y	Y



With 26B, we're surfacing key data elements across the lifecycle—so you have better insight into eligibility, loan limits, institutional controls, and Workforce Pell.

These data points are not only available in the UI, but also configurable and reportable, giving you flexibility in how you use them for decision-making and compliance.

For example, you'll have visibility into things like loan limit exception indicators, Workforce Pell tuition and fees, and institutional limits—helping you understand how decisions are being applied in awarding.

What's shown here is just a subset of the available fields. For full details—including how each field is configured, displayed in the UI, and available in reporting and extract views—please refer to the release notes.

The goal is to provide transparency and access to the right data, so institutions can make informed decisions and adapt as requirements continue to evolve.

Resources

Oracle Cloud

<https://oracle.com>

Oracle Cloud Readiness Content

<https://docs.oracle.com/en/cloud/saas/readiness>

Oracle Cloud Customer Connect

<https://cloudcustomerconnect.oracle.com>

Oracle Documentation

<https://docs.oracle.com>



To get the full value of these features and to make your uptake as easy as possible, see the Readiness What's New documentation on the Oracle Help Center at docs.oracle.com.

I also encourage you to view other resources within Cloud Customer Connect and Oracle documentation. These tools offer guidance, best practices, and a community where you can ask questions or share feedback.

Oracle Student Financial Aid



Thank You.

Desiree Dreszer
Director, Product Management
Cloud Applications



We covered a lot in the 26B spotlight, and we appreciate your time. We're excited about what this release enables and look forward to continuing to support you as these changes evolve. Thank you.

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