



# Curves Ahead

*Driving your business office with confidence  
in an ever-changing Higher Ed landscape*

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Nelnet Campus Commerce



# Learning Objectives



DoE third-party payer guidelines

PCI-DSS v.4.0

Managing third party  
payments/sponsor contracts

Long term payment plans



# DoE third-party payer guidelines



- We received significant and helpful feedback in the form of more than 1,000 comments. The careful review of these comments and consideration of any revisions to the guidance letter will take time. We know that many institutions and companies have already begun to analyze their contracts in anticipation of reporting and compliance deadlines, and we understand the concerns that can cause.
- We are therefore providing additional time for institutions and companies to come into compliance with the guidance. Specifically, **we will delay the effective date of the guidance letter to September 1, 2023**
- The effective date of the revised final guidance letter will be at least six months after its publication, to allow institutions and companies to meet any reporting requirements.
- Deadlines for audit and contractual requirements will follow in fiscal years that begin after the effective date for the reporting requirements.

A screenshot of a Politico Pro article snippet. At the top left, it says "Apr 12, 2023" and at the top right "View in browser". The main title is "POLITICO PRO Morning Education" with "Morning Education" in a large, bold, white font on a black background. Below the title, it says "BY MACKENZIE WILKES". Underneath is a dark blue box with the text "QUICK FIX" in white. The main text of the snippet reads: "— The Biden administration will no longer implement its plan that would have expanded federal oversight over the outside contractors used by colleges like online program managers. The Education Department will issue revised guidance."

# DoE third-party payer guidelines



- *Nelnet meets this need*
- Refunds solution for over-award disbursement
- Nelnet monitors all negotiated rulemaking activity and regulatory changes and takes appropriate action to remain in compliance
- Agreements with our partner schools includes all required regulatory language and details our timeframe requirements for disbursing credit balances
- Compliance and Risk team sends an email to the DoE via [FSAPC3rdpartyserviceoversight@ed.gov](mailto:FSAPC3rdpartyserviceoversight@ed.gov) to let them know that we have executed a contract with a school - and this notification happens within 10 days of the contract being signed with minimal exceptions.





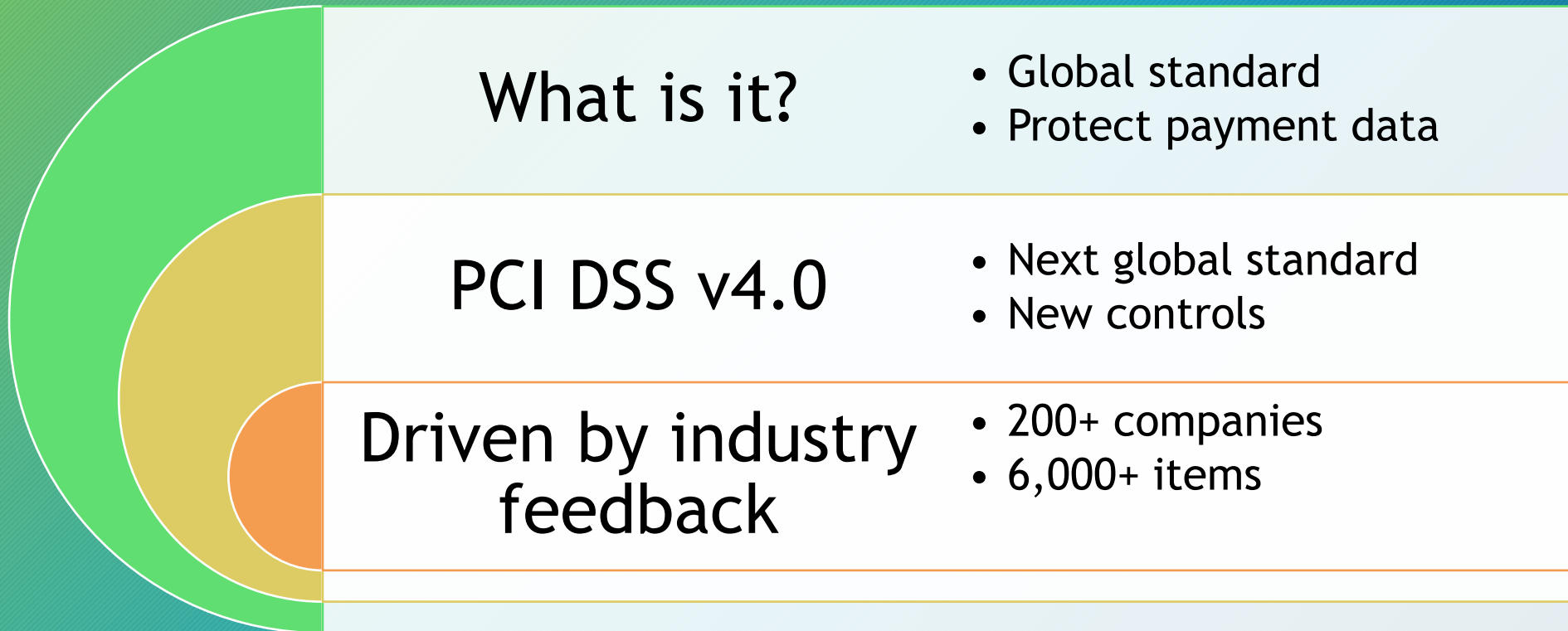
# Q&A



*When it comes to compliance matters do you have a dedicated person assigned to this area?*

- YES
- NO

# PCI-DSS v4.0





# PCI-DSS v4.0



Promote  
security



Continuous  
Process



Increase  
flexibility



Validations  
methods



# PCI-DSS v4.0



Expand MFA • Updated password requirements • *New e-commerce* and phishing requirements

Security must evolve



Clear roles and responsibilities • Added guidance implement and maintain security • More transparency for report reviewers

Criminals never sleep



Allowance of shared accounts • Targeted risk • Customized approach to implement and validate

Flexibility supports innovation



Alignment between reporting and SAQ and info summarized in AOC

Transparency and granularity



# PCI-DSS v4.0








Transition period from PCI DSS v3.2.1 to v4.0

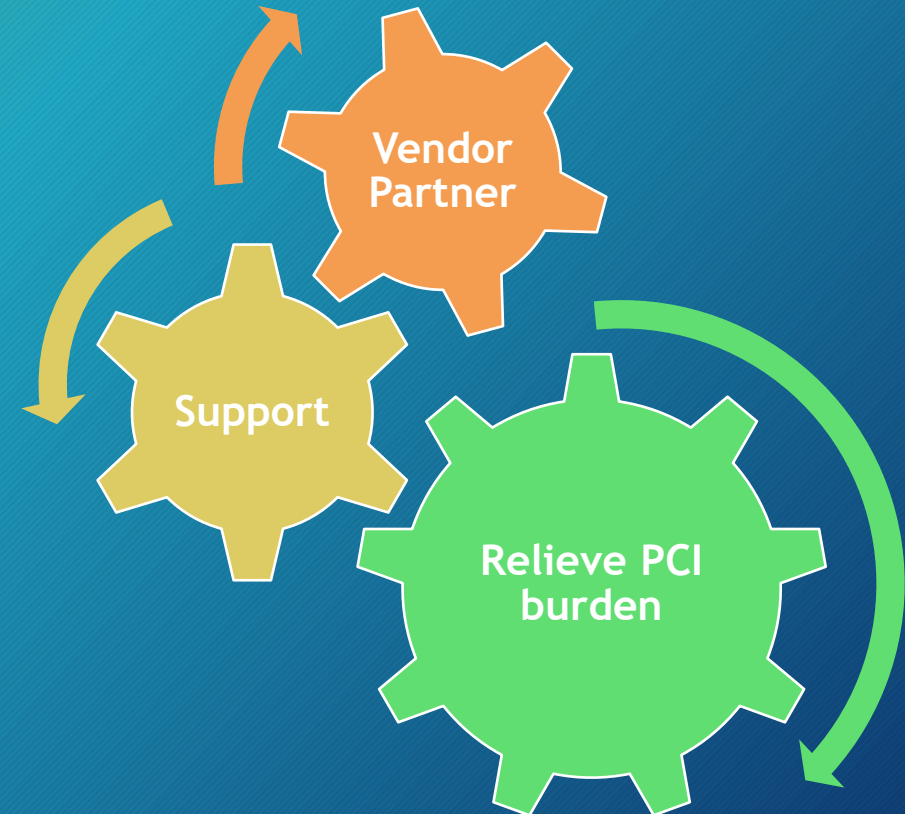
Implementation of future-dated new requirements

Implementation of future-dated new requirements

# PCI-DSS v4.0



-  Outsourcing to third party
-  Are they maintaining compliance & gearing up for v4.0?
-  How are they working to prevent malicious code?
-  Applying innovations?
-  Embrace MFA





# Q&A



*How is your team prepping for the transition to PCI-DSS v4.0?*

- Reviewing our vendor partners and discussing their preparedness*
- We are applying new innovations including expanding our MFA*
- We are updating our password requirements*
- All of the above*

# Managing third-party payments/sponsor contracts



## What is it?

Manage third party sponsor contracts easily through an integrated online portal for the school and sponsors.

## Why?

- Integrated, seamless with real-time account balance
- Reduces workload and outreach
- Billing management
- Sponsor portal
- Search, reporting and exporting features
- Notifications
- Reduces risk, no PII via email
- No more PDFs

The screenshot displays the 'Sponsor Service' interface. On the left is a navigation menu with options: Admin Dashboard, Business Unit, Sponsor Service (highlighted), Manage Payments, Manage eBill Runs, and Settings. The main content area is titled 'Sponsor Service' and contains a 'View Sponsors' section. This section features a search bar with the placeholder text 'Search Sponsor' and 'Search by Sponsor Name, Sponsor ID or Business Unit'. Below the search bar is a table listing various sponsors.

Sponsor Name	Sponsor ID	Business Units	Sponsor View
ABC Pty Ltd	ABC	GLAKE, PSUNV	[View]
Alumni Hall Association	2000113	PSUNV	[View]
Apex Network	SFDD00004	PSCC	[View]
Bank of Fargo	SFTPO0001	PSUNV	[View]
Boat Yard	SFTPO00100	PSUNV	[View]
Convergence Corporation	SFCA000010	PSUNV	[View]
Cottonwood Corporation	000000001	PSUNV	[View]
Ford Motor Company	AV1000	PSUNV	[View]
Ironwood	000010011	PSSTA, PSUNV	[View]
Navy Boost Program	000010073	PSUNV	[View]
Bank of Fargo	000010074	PSUNV	[View]
Bank of Fargo	000010075	PSUNV	[View]
Bank of Fargo	000010076	PSUNV	[View]
Bank of Fargo	000010077	PSUNV	[View]
Bank of Fargo	000010078	PSUNV	[View]
Bank of Fargo	000010079	PSUNV	[View]
Bank of Fargo	000010080	PSUNV	[View]



# Long term payment plans



## Why?

- Help with affordability
- Doesn't add to student loan debt
- Reduce delinquent accounts
- Encourage retention and success to graduation
- Reduce FTE needed to manage the plans

## How?

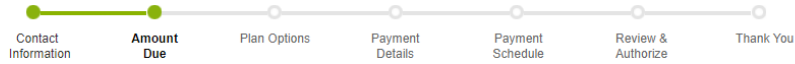
- 12 – 36 payments (*plus*)
- Self-Service
- Disclosures (TILA, Reg Z)
- Auto debit—97% collection rate
- 24/7 support
- Marketing awareness materials



Jared Kerkman University

LTPP2

Progress Tracker



## Amount Due

Name	Amount Due	
David Alliant	4,000.00	<a href="#">View Details</a>

### Solicitation Disclosure

The following disclosure is pursuant to the Truth in Lending Act:

**The Institution you owe:** Your payment plan is for Jared Kerkman University, located at 121 S 13th Street, Lincoln, NE. Your eligibility to participate in a payment plan is dependent on your standing at the institution and/or your course of study. The plan options you see are what are available to you.

**Total Plan Amount:** The total plan amount is the total amount you want to pay to your institution using the payment plan. When you select a payment plan option, you will be able to view the amount of your total balance, which includes any down payment, enrollment fees and adjusted balance.

**Other Costs Associated with the Payment Plan:**

- **Down Payment:** If your institution elects to offer a down payment and if you elect to make a down payment, the down payment amount will be processed by Nelnet immediately according to the payment method you have selected.
- **Enrollment Fee:** The plan you select may include a one-time, nonrefundable enrollment fee. The enrollment fee is based on the number of payments selected for each plan period. The enrollment fee will be disclosed to you during the plan enrollment process.
- **Returned Payment Fee: \$30.00**  
If a payment is returned you will be notified and a returned payment fee will be assessed.
- **Late Payment Fee:** The plan you select may include a late payment fee. If the plan you select has a late fee, you will be notified of the late fee details when you sign up for your plan.

**Installments:** This payment plan is an installment plan with payments due on a recurring basis. The payment interval and a complete schedule of

[Back](#)[Next](#)[Cancel](#)

# TILA

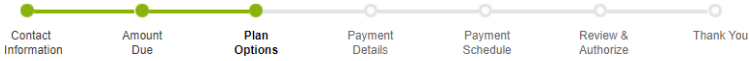




Jared Kerkman University

LTPP2

Progress Tracker



## Payment Plan Options

Amount Due to Jared Kerkman University: \$4,000.00

Select a payment schedule

Show:

LTPP2

Select	Payment Method	Down Payment (Due Today)	Number of Payments	Beginning Month	1st Payment Amount	Available Payment Days	Last Day to Enroll	Payment Plan Enrollment Fee (Due Today)
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	18	July 2023	\$200.00	1st	21 Jun 2023	\$100.00
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	19	July 2023	\$189.48	1st	21 Jun 2023	\$100.00
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	20	July 2023	\$180.00	1st	21 Jun 2023	\$100.00
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	21	July 2023	\$171.43	1st	21 Jun 2023	\$100.00
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	22	July 2023	\$163.64	1st	21 Jun 2023	\$100.00
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	23	July 2023	\$156.53	1st	21 Jun 2023	\$100.00
<input type="radio"/>	Automatic Payments from <ul style="list-style-type: none"> <li>Bank Account</li> <li>Credit/Debit Card</li> </ul>	\$400.00	24	July 2023	\$150.00	1st	21 Jun 2023	\$100.00

|

# Self-Service



# Q&A



*The Truth in Lending Act (TILA)* promotes the informed use of consumer credit by requiring timely disclosure about its costs.

- True*
- False*



# Resources



## DoE Third Party Reporting Guidelines

<https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2023-02-15/requirements-and-responsibilities-third-party-servicers-and-institutions-updated-may-16-2023>

