Steps to Determining Your Legacy or Non-Legacy Status

A self-service guide to the federal student loan interim exception

AUDIENCE	Current and prospective UC students and families

Why use this guide?

Federal student loan rules changed on July 1, 2026. Some students who borrowed before that date may temporarily remain subject to earlier federal loan limits. This is often called “legacy status” or the “interim exception.” Use the questions below to understand your likely status. UC Student Financial Aid makes the official determination using your UC and federal loan records.

Start here

Filing a FAFSA, attending UC, receiving a scholarship or Pell Grant, or having a loan offered or accepted before July 1, 2026 does not by itself establish legacy status. A qualifying Direct Loan must have been disbursed for the applicable program before July 1, 2026.

What do the two statuses mean?

LIKELY LEGACY / INTERIM EXCEPTION	LIKELY NON-LEGACY
You may temporarily remain under certain pre–July 1, 2026 federal Direct Loan rules for the same program, during your expected time to credential. This is not a promise that the exception lasts until graduation.	The federal loan rules effective July 1, 2026 generally apply to you, including applicable annual and aggregate loan limits and Grad PLUS or Parent PLUS restrictions.

Follow the decision steps

STEP 1 | Did you receive (have disbursed) any federal Direct Loan for this program before July 1, 2026?	
YES → Continue to Step 2.	NO → You are likely non-legacy for this program.

STEP 2 | On June 30, 2026, were you a degree- or certificate-seeking student in good standing in this program and not graduated or officially withdrawn?	
YES → Continue to Step 3. You did not have to be registered for fall classes on June 30.	NO → You are likely non-legacy. Ask UC to review a corrected or unusual enrollment record.

STEP 3 | Is the program you are pursuing now the same program or credential level you were pursuing on June 30, 2026?	
YES → Continue to Step 4.	NO → A new program is generally non-legacy. Ask UC to review undergraduate major changes, dual degrees, ACCEND, or overlapping programs.

STEP 4 | Have you remained a continuing student in that program without officially withdrawing, graduating, or otherwise ceasing enrollment?	
YES → Continue to Step 5.	NO → Your exception may have ended. An approved Title IV leave may be treated differently; contact Student Financial Aid.

STEP 5 | When did you begin this program, and how many semesters or equivalent portions had you completed before July 1, 2026?	
YES → Use the program-length chart below to estimate the time remaining; continue to Step 6.	NO → If your start date or completed portion is unclear, stop and ask Student Financial Aid to review your record.

STEP 6 | After subtracting the portion completed before July 1, 2026, did you have time remaining in the program's normal published length?	
YES → Your potential legacy window is the lesser of six semesters or that remaining time. Continue to Step 7.	NO → Your expected time to credential was zero; current federal loan rules apply.

Examples: Applying the time-to-credential calculation

These examples assume that the student received a qualifying Direct Loan before July 1, 2026, was enrolled in the same program on June 30, 2026, and otherwise meets the initial interim-exception requirements.

EXAMPLE 1 | CONTINUING BACHELOR'S STUDENT—FALL 2022 START

Jordan began an eight-semester bachelor's degree program in Fall 2022 and completed Fall 2022 through Spring 2026. Jordan plans to continue in the same undergraduate program in Fall 2026.

Calculation: 8-semester program length − 8 semesters completed before July 1, 2026 = 0 semesters remaining.

Result: Jordan has no remaining expected time to credential. Continuing into a ninth semester does not extend the temporary exception; the federal loan rules effective July 1, 2026 apply.

EXAMPLE 2 | TRANSFER STUDENT WITH 60 OR MORE APPLICABLE CREDITS

Taylor entered UC in Fall 2024 with at least 60 semester credits accepted and applied to an eight-semester bachelor's degree program. Under UC's methodology, those credits represent approximately four semesters. Taylor then completed four semesters at UC through Spring 2026 and will remain in the same undergraduate program in Fall 2026.

Calculation: 4 equivalent semesters from applicable transfer credit + 4 semesters completed at UC = 8 semesters completed; 8 − 8 = 0 semesters remaining.

Result: Taylor has no remaining expected time to credential. Applicable transfer credit counts when UC determines the portion of the program already completed; the federal loan rules effective July 1, 2026 apply.

EXAMPLE 3 | TWO-SEMESTER GRADUATE PROGRAM—FALL 2025 START

Morgan began a graduate program in Fall 2025 with a published full-time length of two semesters. Morgan completed Fall 2025 and Spring 2026 and plans to continue in the same program in Fall 2026.

Calculation: 2-semester program length − 2 semesters completed before July 1, 2026 = 0 semesters remaining.

Result: Morgan has no remaining expected time to credential. Enrollment beyond the program's published length does not extend the temporary exception; the federal loan rules effective July 1, 2026 apply.

IMPORTANT

These examples are illustrations. UC must review your official program length, start date, applicable transfer credit, enrollment history, loan records, and federal system result to make the official determination.

STEP 7 | Are you still within that calculated time-to-credential window now?	
YES → You are potentially legacy, subject to UC and federal record confirmation.	NO → Your temporary legacy period has ended; current federal loan rules apply.

How the time-to-credential window works

Meeting the first two requirements does not automatically mean legacy treatment lasts until graduation. Your protected period is limited by your expected time to credential: the lesser of three academic years (normally six semesters) or the time remaining in the published length of your program as of July 1, 2026.

UC PROGRAM TYPE	NORMAL PROGRAM LENGTH	STARTING POINT FOR REVIEW
Bachelor's degree	8 semesters	8 minus semesters completed before July 1, 2026
Associate degree	4 semesters	4 minus semesters completed before July 1, 2026
Certificate	2 semesters	2 minus semesters completed before July 1, 2026

Use your actual program start and academic history—not only your class level—to estimate how much of the program was completed before July 1, 2026. UC also considers applicable UC credits and accepted transfer, College Credit Plus, AP, IB, and other accepted credit. Part-time attendance, repeated coursework, or taking fewer credits does not automatically extend the window. The published length of your specific program controls if it differs from the standard lengths above.

Stop and ask UC to review

Contact Student Financial Aid before changing programs, withdrawing, taking a leave, transferring, or relying on a status that conflicts with your FAFSA, federal loan information, or UC records. A change in undergraduate major that does not create a new program may be treated differently, but UC must review the record.

What happens next?

- Check your UC email and Catalyst To-Do List for notices or requested information.
- Do not assume that a current award, refund, or earlier status cannot change after enrollment or record updates.
- For an official determination, contact UC Enrollment Services through the contact options enrollmentservices@uc.edu or 513-556-1000.

Federal guidance used

This guide reflects U.S. Department of Education guidance available as of August 10, 2026. Federal requirements and system results may change. UC will apply the rules and guidance in effect when eligibility is reviewed.

- Federal Student Aid, Frequently Asked Questions—Loan Limits (May 20, 2026): https://fsapartners.ed.gov/sites/default/files/2026-05/FrequentlyAskedQuestionsLoanLimits.pdf
- Federal Student Aid, OBBBA Information Repository: https://fsapartners.ed.gov/knowledge-center/topics/one-big-beautiful-bill-act-information