'GAINFUL EMPLOYMENT' RULE REPORTING: REQUIREMENTS AND PROCESS

CAREER EDUCATION REVIEW
JUNE 25, 2015

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GAINFUL EMPLOYMENT METRICS – RE-CAP

- **A program leads to Gainful Employment if:**
  - **Debt to earnings ratio is no more than 8% of average annual income or 20% of average discretionary income for 2-year cohort or 4-year cohort ("Passing" program)**

- **For the first 2014-2015 calculation year:**

  - **2-year cohort is comprised of students graduating in 2010-2011 and 2011-2012 award years (30 or more completers)**

  - **4-year cohort is comprised of students graduating in 2008-2009, 2009-2010, 2010-2011, and 2011-2012 award years (completers in 2 year cohort is less than 30 and there are 30 or more completers in the 4 year cohort)**

- **Three GE Program status outcomes: passing, zone, and failing. A program becomes ineligible if it fails two of three consecutive years or fails or is in the zone four consecutive years.**

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KEY DATES

January 31, 2015: Deadline for use of updated GE Disclosure template for 2013-14 disclosures (including disclosures required under current regulation).

July 1, 2015: Effective Date of Final Rule.

July 31, 2015: All GE Program reporting data due for all Title IV students enrolled in GE Programs from the 2008/2009 Award Year through 2013/2014 Award Year. [Programs with medical and dental residencies report data for 2007/2008 AY also]

October 1, 2015: GE Program data due for 2014/2015 4 Award Year.

December 31, 2015: Program Certification deadline for all GE Programs (more information from ED on mechanics to be released).

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KEY DATES

2016 –
- Schools receive list of completers based on GE data submitted
- Schools may challenge completer list data
- Schools receive median/mean earnings information from SSA (no challenge)
- [Summer 2016] – Draft D/E Rates Released – Rates and backup up detail will be distributed to schools by NSLDS.
  - Challenge period for draft rates begins, then ...
  - Final Rates issued, then ...
  - Schools may notify ED of intent to submit Alternate Earnings Appeals within 14 days with documents due within 60 days.
* *Become familiar with challenge and appeals time frames and procedures now.*

January 1, 2017 – New GE Disclosures contained in Final Rule required to be implemented (updated template will be issued by ED prior).

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DEBT- TO-EARNINGS RATE CALCULATION PROCESS

July 31, 2015

Schools Report GE data to NSLDS

- AY 2008-2009 thru 2013-2014 data

October 1, 2015

Schools Report GE data to NSLDS

- AY 2014-2015

Schools Receive Completer Lists

- Median Earnings for Debt-to-Earnings

Schools may challenge Completer List Data

- Challenges are Adjudicated by FSA

Schools Receive Draft Debt-to-Earning Rates

- Rates and Back-up detail will be distributed to schools by NSLDS

Schools may challenge Debt-to-Earnings Rate Details

- Challenges are Adjudicated by FSA

Schools Receive Final Debt-to-Earnings Rates

- Schools may notify FSA of intent to submit Alternate Earnings Appeals within 14 days and must submit Appeal documents within 60 days

Note: FSA Calculates & Validates each step before sending to schools

6

GE REPORTING - OVERVIEW

- Determine all students who enrolled in a GE Program during the reporting award year (note: *not just completers – all students who were enrolled at any time during that award year*)

- Only submit data on Title IV aid recipients (including students only receiving Pell Grants, but excluding students who only received FWS and FSEOG funds)

- Only submit for GE programs existing as of July 1, 2015

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WHAT IS A GE PROGRAM?

- The same program offered by institutions with different OPEIDs are separate GE Programs.

- If the six digit OPEID, credential level and six digit CIP are the same, ED treats the program as one GE Program (without regard to varying program length). But a separate GE disclosure template is required for the same GE Program offered at differing lengths.

- Programs at different credential levels but same six digit CIP are different GE Programs.

- Programs with the same credential level but different six digit CIP are different GE Programs.

Note: New 34 CFR § 600.21(a)(11) requires IHEs to update their E-App within 10 days regarding loss of eligibility of a GE Program; a change in the GE Program's name, CIP or credential level; or any updates to the required certification.

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GE Data - Students

INCLUDE:

- **All Title IV students enrolled in GE Programs**
- **A student enrolled in more than one GE Program must be reported separately for each program.**
- **A student who 'stopped out' and re-entered the same GE Program during the _same_ award year must be reported separately for each enrollment.**
- **A student who was enrolled in the same GE Program during _multiple_ award years must be reported separately for each award year.**

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CASE STUDY-SINGLE PROGRAM STOP / START

GE DATA - CATEGORIES

- Institution Data
  - Institution Code (8 digit OPEID including specific institution location where student is or was enrolled)
  - Institution Name (as included on the institution's ECAR)

- GE Program Information
  - Program Name (name of program the student was enrolled in during the award year)
  - Award Year
  - CIP Code (6 digit) (must be a valid CIP Code from 2010 list of available codes)

R-Q10: The OPEID for our institution that will be in effect on 7/1/2015 is different in the prior years for which I must report student data. Which OPEID should I use when I report the GE program for those prior years?

R-A10:You should use the current OPEID to report the GE program for all years that you are reporting data. [February 11, 2015]

GE DATA - CATEGORIES

- GE Program Information (continued)
  - Credential Level
  - Medical or Dental Internship or Residency
  - Length of GE Program (# of weeks, months or years as published by the school)
  - Length of GE Program Measurement (unit for measuring length of program as published by the school: weeks, months or years)

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GE DATA - STUDENTS

- Student Data

  - Student Social Security Number
    - If no ssn available for the student, do not report the student
  - Student First Name (as it appears on SS card)
  - Student Middle Name or Initial
  - Student Last Name (as it appears on SS card)
  - Student Date of Birth

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GE DATA – STUDENTS (CONTINUED)

- Student's Enrollment Status as of the 1st Day of Enrollment in Program (Full-Time, Three-Quarter Time, Half-Time, and Less Than Half-Time)

- Program Attendance Begin Date (date student began enrollment in program, even if it precedes the award year being reported on)

- Program Attendance Begin Date for this Award Year (date in award year that student began enrollment in the program

- Program Attendance Status During Award Year -Graduated, Withdrew, Enrolled

- Program Attendance Status Date (date of student's graduation or withdrawal from the GE Program – if student remains enrolled, report June 30 of the award year being reported)

R-Q12: If an institution does not know or does not retain a student's enrollment status as of the beginning of the student's enrollment in that program but rather only at the end of an add/drop period or other census date, can the institution report the student's enrollment status as of the date of the end of the add/drop period or as of the census date?

R-A12:In these instances, institutions may report a student's enrollment status as of the end of the established add/drop period or as of the census date. [April 27, 2015]

R-Q5: HOW SHOULD AN INSTITUTION REPORT STUDENTS WHO ARE ENROLLED IN A SUMMER TERM THAT CROSSES AWARD YEARS?

R-A5:Since the student was enrolled in both award years, the institution should report the student separately in both award years' submissions. The 'Program Attendance Status During Award Year' field for such a student would be 'E' (Enrolled) in the first award year's submission and either 'E' (Enrolled), 'W' (Withdrew), or 'G' (Graduated) for the subsequent award year's submission, whichever is the appropriate status for the student in that award year.

Note that reporting students in GE Programs in both award years for a summer crossover term does not change how institutions award Title IV aid for a crossover payment period. [February 11, 2015]

R-Q6: HOW SHOULD AN INSTITUTION REPORT A STUDENT WHO IS NOT TECHNICALLY ENROLLED ON JUNE 30 IN AN AWARD YEAR, BUT HAS NOT WITHDRAWN FROM THE PROGRAM BECAUSE THE STUDENT IS EXPECTING TO RETURN IN THE FALL?

R-A6:As with regular enrollment reporting to NSLDS, students are to be considered as in school and continuously enrolled during holiday and vacation periods, as well as during the summer between academic years (even if not enrolled in a summer session), as long as the institution has no reason to believe that the student will not return following the holiday, vacation, or summer period.

For example, the 'Program Attendance Status During Award Year' field for such a student would be 'E' (Enrolled) and not 'W' (Withdrew) at the end of the spring term if the student is expected to re-enroll for the fall term. If the student does not return as expected, the 'Program Attendance Status During Award Year' field must be changed to 'W' (Withdrew) and the 'Program Attendance Status Date' should be completed with the last date of attendance. [February 11, 2015]

R-Q13: A STUDENT WAS ENROLLED IN A GE PROGRAM FOR AN AWARD YEAR, BUT DID NOT RECEIVE TITLE IV AID UNTIL A SUBSEQUENT AWARD YEAR. SHOULD THE INSTITUTION REPORT THE STUDENT AS ENROLLED IN THE GE PROGRAM FOR THE FIRST AWARD YEAR OF ENROLLMENT EVEN THOUGH NO TITLE IV AID WAS RECEIVED?

R-A13:No. Institutions should only report a student beginning with the award year when the student first received Title IV aid for the GE program. However, when reporting the "Program Attendance Begin Date", the institution would report the date when the student began the GE program, even if that was in an award year when the student did not receive Title IV aid.

For example, consider a student who first enrolled in the GE program during the 2010-2011 award year but did not receive any Title IV aid for that award year. The student did receive Title IV aid for the 2011-2012 award year. The institution would not report the student for the 2010-2011 award year but would report beginning with the 2011-2012 award year. The "Program Attendance Begin Date" field included in the 2011-2012 reporting would be the date of the student's first enrollment during the 2010-2011 award year. Similarly, if the student in this example did receive Title IV aid in 2010-2011, he or she would be reported for both award years.

Also, for students who completed or withdrew from the program, the institution would include in its reporting for the award year when the student left school, financial data (i.e., private loans, institutional debt, tuition and fees, and books and supplies and equipment) for the student's entire enrollment in the program, including any years when the student did not receive Title IV aid. [April 27, 2015]

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GE DATA - FINANCIAL

- Private Loans Amount
  - Gross Amount of private educational loans received by the student at any time for attendance in the GE Program
  - Report full amount for G or W student; leave blank for Enrolled students
  - If no private loans enter zero
  - Used to determine the debt portion of a program's D/E rates
- Institutional Debt
  - Total amount of institutional debt owed by the student for attendance in a GE Program as of the day the student graduated or withdrew, not just from the award year being reported
  - Report full amount for G or W student; leave blank for Enrolled students
  - Used to determine the debt portion of a program's D/E rates

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R-Q14: HOW SHOULD WE REPORT THE AMOUNT OF PRIVATE LOANS AND INSTITUTIONAL DEBT FOR A STUDENT WHO WAS ENROLLED IN MORE THAN ONE EDUCATIONAL PROGRAM AT THE INSTITUTION?

R-A14:As provided in the NSLDS Gainful Employment User Guide, institutions must report amounts of private student loans and institutional debt for students who, during the award year, had either withdrawn or completed the GE Program.

If the student was enrolled in more than one educational program, the institution has two options for attributing the private loan or institutional debt amounts – attribute the amounts evenly among the GE Programs or use the actual amounts applied to each GE program.

Under the first option, if all of the programs the student was enrolled in were GE Programs, the institution may simply divide the total amount received (or owed for institutional debt) by the number of GE Programs and use the result for reporting. Note that under this option amounts are not attributed to a non-GE Program. For example, if a student took out $10,000 in private loans for enrollment in two GE Programs, $5,000 is attributed to each of the two GE Programs. However, if one of the educational programs was not a GE Program, the full $10,000 is attributed to the one GE Program.

Under the second option, if the institution can document the actual amount of private loans or institutional debt that that was used to cover educational costs for each program, it may attribute that amount to each program. For example, if a student took out $20,000 in private loans while enrolled at the institution and the institution has documentation that $12,000 of that amount was used to cover educational costs for a non-GE Program, only the remaining $8,000 is attributed to the GE Program. Institutions choosing this option must maintain the documentation so that it is available upon request.

As provided in the NSLDS Gainful Employment User Guide, institutions do NOT report the amount of Title IV Loan Debt. Those amounts are determined by the Department from NSLDS data. [May 5, 2015]

R-Q11: CAN THE DEPARTMENT PROVIDE MORE GUIDANCE ON REPORTING INSTITUTIONAL DEBT?

R-A11:The gainful employment regulations at 34 CFR 668.404(d), which go into effect on July 1, 2015, define the term institutional debt as "The amount outstanding, as of the date the student completes the program, on any other credit, (including any unpaid charges) extended by or on behalf of the institution for enrollment in any GE program attended at the institution that the student is obligated to repay after completing the GE program . . . "

Therefore, in addition to institutional loans and other forms of institutional financing, institutional debt also includes debt arising from any other outstanding obligations the student owes at the time the student withdraws from or completes the GE program. **Examples of these other financial obligations include library fees, graduation or withdrawal fees, laboratory fees, etc.**

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Amounts owed by students to the institution under the Federal Perkins Loan Program should not be reported as institutional debt. Perkins Loans will be counted as Title IV debt in the Debt-to-Earnings calculations.

Note that over-awards and other Title IV student aid owed to the institution by the student, including as a result of a Return of Title IV (R2T4) calculation, are not considered institutional debt and therefore should not be reported as part of institutional debt. However, amounts owed to the school for unpaid tuition, even where those amounts are the result of funds returned by the institution to the Title IV programs under an R2T4 calculation, should be included.

For example, a student enrolls in a 900 clock hour program, incurring direct charges of $10,000 (assume the institution bills up front for the entire program). Her financial aid package includes a Federal Pell Grant of $5,775 and a Direct Subsidized Loan for $3,500 ($3,462 net disbursement amount). She is placed on an institutional financing plan for the remaining $763 of institutional charges. After all of the student's Title IV aid has been disbursed and with $363 remaining to be paid under the institutional financing plan, the student withdraws from her program of study.

As the result of an R2T4 calculation, the institution must return $1,050 in Title IV funds. The student now has a balance due the institution of $1,413 that is made up of the $363 remaining under the original institutional financing plan and the $1,050 she now owes as the result of that amount having been returned by the institution to the Title IV programs. The institution should report the entire amount of $1,413 as institutional debt. [April 8, 2015]

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24

GE DATA - FINANCIAL

- Tuition and Fees Amount
  - Report total amount of tuition and fees charged the student for the entire program (not just for the reporting award year)
  - If status is G or W, report full amount
  - If status is E, leave blank
  - Used to determine the debt portion of a program's D/E rates
  - When determining a program's median loan amount, each student's loan debt is capped at the total amount for tuition, fees, books, supplies and equipment.

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R-Q9: Can a school report the amount of tuition and fees remaining on a student's account after scholarships and other non-title IV aid awards are applied? In other words, can a school report the net amount of tuition and fees?

R-A9:No. A school must report the total amount of tuition and fees charged the student for the program before any aid or other credits are applied to the student's account. [February 11, 2015]

GE DATA - FINANCIAL

- Allowance for Books, Supplies, and Equipment (COA)
  - Amount of allowance included in COA for books, supplies and equipment for the entire program (not just for the reporting award year)
  - If the institution assessed a higher amount that the allowance in the COA, report the higher amount.
  - If status is G or W, report full amount
  - If status is E, leave blank
  - Used to calculate the program's D/E rates
  - When determining a program's median loan amount, each student's loan debt is capped at the total amount for tuition, fees, books, supplies and equipment.

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SUGGESTED WAYS TO ORGANIZE YOUR DATA

- Single Program by Award Year
- Single Program by Multiple Award Years
- Multiple Programs in a Single Award Year
- Multiple Programs in Multiple Award Years

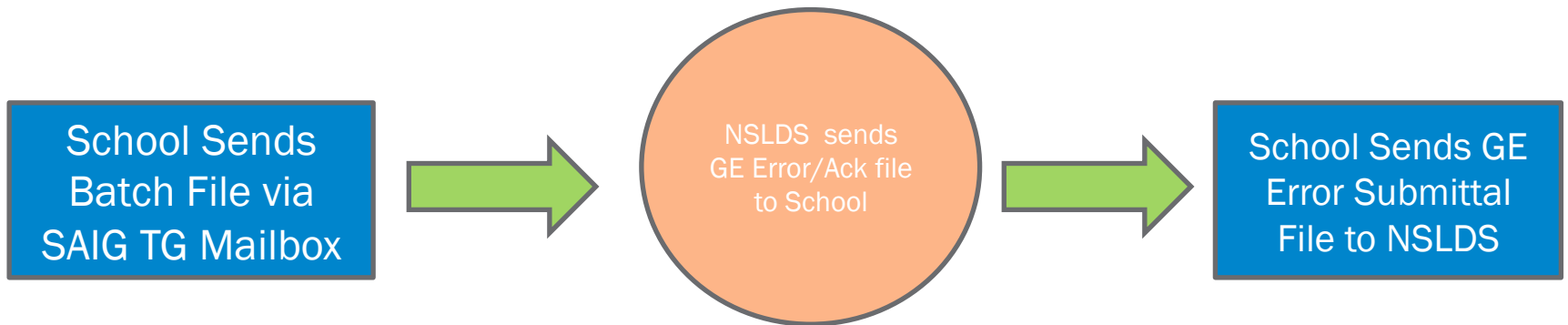R&L Ritzert|Leyton

REPORTING METHODS

- There are two options available for reporting GE data to NSLDS

- **Batch Reporting**
  - Comma separated values (CSV) format
  - Fixed width format

- **Online Reporting**
  - Direct data entry through NSLDS Professional Access Website

BATCH REPORTING

- Uses SAIG TG mailbox to deliver records

- Must sign up to use batch services on fsawebenroll.ed.gov

- Institution's Primary Destination Point Administrator (PDPA) must associate an online user with Enrollment Update for online services

- Once you are set up you can use the GE employment submittal File Record Layouts (CSV) and (Fixed-width) available at www.ifap.ed.gov/GainfulEmploymentInfo/GEResourcesV2.html

- The batch file layouts are also provided in Appendix A of the *NSLDS Gainful Employment User Guide*

BATCH REPORTING

The Process:

School Sends Batch File via SAIG TG Mailbox → NSLDS sends GE Error/Ack file to School → School Sends GE Error Submittal File to NSLDS

BATCH REPORTING

SUBMITTAL FILE:

- **Header Record**—Each GE file contains a single Header record. The Header record identifies the source of the file and the file's preparation/creation date, as well as other identifying information.

- **Detail Records** – There are two types of Detail Records:
  - Detail Submittal record type: one or more for each student per GE Program, contains information specific to that student's program for that Award Year.
  - Mass Update/Deactivation record type is used to update one or more records previously provided to NSLDS, and can be used for the purpose of deactivating one or more records.

BATCH REPORTING

SUBMITTAL FILE cont'd.:

- **Trailer Record**—Each GE File contains a single Trailer Record. The Trailer record shows the total number of Detail records contained in the file.

- **Format Data**—All Detail records must be formatted according to the record layout and field definitions in Appendix A. Verify data and check for formatting errors before submitting a file to NSLDS.

BATCH REPORTING

Response/Error Acknowledgement File

- **Header, Detail, and Trailer Records**—Each GE Response Error / Acknowledgment file contains a single Header record, multiple Detail records with the error codes at the end of each record, and a single Trailer record. **The Header Record** identifies the source of the file and the file's preparation/creation date, as well as other identifying information. **The Detail Records**, relate to records submitted which have at least one error. Up to five errors per record may be identified. Records without errors, and accepted by NSLDS will not be in this file. Detail records are grouped by record type. **The Trailer Record** shows the number of Detail Records contained in the file.

- **Format Data**—For descriptions of error codes refer to Appendix A of the *NSLDS GE User Guide*.

BATCH REPORTING

Error Submittal File

- **Header, Detail, and Trailer Records**—Each GE Error Submittal file contains a single Header record, multiple Detail records, and a single Trailer record. **The Header Record** identifies the source of the file and the file's preparation/creation date, as well as other identifying information. **The Detail Records** contain information specific to that student's program for that Award Year, with all previously identified errors corrected. **The Trailer Record** shows the number of Detail Records contained in the file.

- **Format Data**——All Detail records must be formatted according to the record layout and field definitions in Appendix A of the *NSLDS User Guide*. Always verify changes and check for formatting errors before submitting an error submittal file to NSLDS.

BATCH REPORTING

TIME FRAMES

- Initial Submission: July 1 this year, October 1 thereafter, but institutions may report on a rolling basis.

- GE Response Error/Acknowledgement: NSLDS should send within 36 hours of processing an institution's GE Submittal file
  - If you don't receive a GE Response Error/Acknowledgement File within 36-48 hours of submitting your GE Submittal file call the NSLDS Customer Support Center - (800) 999-8219 M-F : 8 a.m. to 9 p.m. EST (excluding Federal holidays)

- GE Error Submittal: Institution should send to NSLDS within 10 days of receipt of errors in a GE Response Error/Acknowledgement File

GE REPORTING ONLINE

- GE Add: direct data entry on NSLDS Professional Access Web Site using an online form
  - Requires up to date web browser and SSL encryption enabled.
  - One record at a time
  - NSLDS verifies in real-time – you can't submit with errors in the form
  - Remember to submit data before 30 minutes of inactivity

- GE Submittal:
  - Institutions may add records by uploading spreadsheet
  - Spreadsheet template available at : http://www.ifap.ed.gov/GainfulEmploymentInfo/indexV2.html
  - Institutions can create their own spreadsheet. (See format in App. A of *GE User Guide*)
  - File size limit = 1MB

GE REPORTING ONLINE

- **SSN Conflict**
  - Allows institution to view a list of all data providers who have previously reported on a particular SSN, for which the institution is trying to report and receiving a SSN Conflict Error.
  - If a student record is already in NSLDS with the same SSN as a record you are trying to submit, the identifiers for both records associated with the SSN must match or your records will not be able to be submitted.
  - The institution should attempt to resolve the conflict in coordination with the other data provider.

- **GE List**
  - Provides a detailed list of all records loads into NSLDS for GE Reporting.

- **GE Detail**
  - Allows institution to view a detailed history of a student's enrollment status.

- **GE Update**
  - Capability to select a student to change GE information
  - May be sorted by name, SSN, school ID, or status

GE REPORTING ONLINE

- **GE Deactivate**
  - Allows institution to deactivate a GE record when the record contains error(s)

- **GE Mass Update/Deactivate**
  - Capable of updating or deactivating a group of records with the same data element to be updated or when all need to be deactivated.

- **Help!**
  - Each GE page on NSLDS features a Help tab which can be viewed individually from each page, or downloaded and printed.

ADDING RECORDS ONLINE

ADDING RECORDS ONLINE CONT.

Gainful Employment Add

Student Details	
SSN: 999004567	
First Name: Test	
Middle Name: J	
Last Name: Tester	
Date of Birth: 01011950	

Gainful Employment Details

Award Year: 20102011
Institution Code (OPEID): 06789900
Institution Name: North South University
Program Name: Other
CIP Code: 470608
Credential Level: 03 - Bachelor's Degree
Length of GE Program: 24.33
Length of GE Program Measurement: Months
Medical or Dental Internship or Residency: No
Enrollment Status as of the 1st Day of Enrollment in Program: Full-Time
Program Attendance Begin Date: 09/01/2005
Program Attendance Begin Date for This Award Year: 08/25/2010
Program Attendance Status During Award Year: Enrolled
Program Attendance Status Date:
Private Loans Amount:
Institutional Debt:
Tuition and Fees Amount:
Allowance for Books, Supplies, and Equipment:

Confirm   Cancel

Click on Confirm or Cancel

41

How and Why – Online Add

- **Recommended method for schools with smaller number of records**

- **Data can be gathered manually and is keyed in rather than loaded electronically**

- **Errors are presented to the user in real time for correction**

BASICS OF REPORTING – NSLDS SUBMITTAL SPREADSHEET

Submittal Spreadsheet

- One or more records added at a time
- Can add more than one award year at a time
- All data submitted online
- Option to validate data or validate and submit

How and Why – Submittal Spreadsheet

- Well suited for schools with moderate sized GE populations

- Useful for schools with limited IT support

- Immediately know how many records loaded and how many had errors

- Errors can be worked immediately and resubmitted

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GE SUBMITTAL SPREADSHEET

NSLDS Gainful Employment Submittal Spreadsheet – available now

	A	B	C	D	E	F	G	H	I
1	Award Year	Student Social Security Number	Student First Name	Student Middle Name	Student Last Name	Student Date of Birth	Institution Code	Institution Name	Program Name
2	20102011	000-11-2222	First	Middle	Last	1966-07-21	06789900	Test School Name	Test Program Name
3	20102011	111-22-2222	First	Middle	Last	1966-07-21	06789900	Test School Name	Test Program Name
4	20102011	223-01-0001	First	Middle	Last	1966-07-21	06789900	Test School Name	Test Program Name
5									

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GE DATA EXTRACT REPORT

Gainful Employment Data Extract File Record Layout (GENEX1) -

- Allows school users to request an ad-hoc fixed-width extract of the Gainful Employment data supplied by the institution
- Data supplied by all submission methods is present in report
- Can be requested by multiple parameters to create a more individualized method of data review

- NSLDS users may also review GE records online using GE List.

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COMMON NSLDS SUBMISSION ISSUES

Problem: Batch file was submitted and a GE Response Error/Acknowledgement File was not received.

Resolution: Call the Customer Support Center to troubleshoot the issue which may be one of the following:

- Security Issue
- Transmission Issue
- File Layout Issue

COMMON NSLDS SUBMISSION ISSUES

Data Elements

- CIP Code
  - Are you using 2010 CIP codes?
- Date Fields
  - Is the date formatted correctly?

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UPDATING GE DATA

Once a record has been identified and one or more corrections are needed, several methods are available to make those corrections -

- Single Record Update
- Single Record Deactivate
- Mass Update/Deactivate

ERRORS VS. CORRECTIONS

- Ensure your GE records have loaded and are correct on NSLDS

- Errors

  - Records not loaded to NSLDS

    - Record returned with error codes in GE Response Error/Acknowledgement file

    - Record level errors cause individual records not to load to NSLDS

- Corrections

  - Records loaded to NSLDS

    - Data loaded with some inaccurate information

CORRECTIONS

Records can be updated ONLINE for the same award year.

If any of the following fields are updated, the original record is inactivated and a new active record with the changes is automatically created:

- Student SSN
- Institution OPEID
- CIP Code
- Credential Level

If Award Year needs to be updated, the original record must be deactivated and a new record submitted.

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CORRECTIONS

Records can be updated in Batch for the same award year for all but the following fields:

- Award Year
- Student SSN
- Institution (OPEID)
- CIP Code
- Credential Level

- Program Attendance Begin Date
- Program Attendance Begin Date for This Award Year
- Program Attendance Status Date

CAUTION: If any of these fields *ARE* updated in batch, the existing GE record is not updated. A NEW active record will be created. The original record would then need to be manually deactivated to prevent the existence of duplicate records for the student

CORRECTION EXAMPLE

Q: We reported that Alex was enrolled in a GE program in award year 2008-2009 but he was actually only enrolled in a GE program in 2009-2010. What do we do?

A: Since Award Year is not updatable, Alex's record for 2008-2009 needs to be deactivated online and the **correct information re-submitted to NSLDS either on-line or in batch.**

GE RULE COMPLIANCE RECOMMENDATIONS

- Start preparing GE Program reporting data now if you have not yet started.

- Develop an internal system to collect and store all required GE Program data, including information necessary to estimate D/E rates.

- **Evaluate whether GE Program CIP and related SOC codes are accurate.**

- **Remove any inactive GE Programs on ECAR by July 1, 2015 and add any new accreditor, state approved GE Programs that will be offered as of July 1, 2015.**

- Implement graduate employment surveys to collect job titles, student salary, employer and other relevant GE Program rate information. Continue surveys for at least 4 years post-graduation.

- **Develop policies and procedures to regularly review GE Program disclosures (including website and marketing collateral) to ensure information is compliant.**

- Continue student counseling on repayment of debt.

- Develop in-house expertise on the GE Rule to back up and oversee any third party assistance: ultimate responsibility is with the institution.

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GE REPORTING RESOURCES

ED's 1/13/15 and 1/15/15 Webinars on GE Reporting are posted on IFAP/Gainful Employment Information site – slides, audio and transcripts

NSLDS and SAIG data transmission functionality is now LIVE
- NSLDS: GE Submittal Spreadsheet Upload or GE Online Add
- SAIG: Batch File

Updated NSLDS GE User Guide and Instruction Guide has been posted to IFAP

Spreadsheet template for use with NSLDS data transmission has been posted (spreadsheet use voluntary, not required)

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STEPHEN T. CHEMA II

Steve is a Senior Associate at Ritzert & Leyton, PC. As a member of the Firm's Postsecondary Education Practice Group, he advises clients on a wide array of matters related to compliance with student financial aid programs under Title IV of the Higher Education Act, including topics such as 90/10, the incentive compensation rule, institutional and student eligibility issues, and gainful employment.

He also specializes in advising postsecondary institutions on compliance with privacy laws, including the Family Educational Rights and Privacy Act ("FERPA"), the Gramm-Leach-Bliley Act ("GLBA"), and the Federal Trade Commission's "Red Flags" rule. In addition, his work involves counseling institutions on issues related to anti-discrimination and employment law, campus security and consumer protection.

Steve has appeared in matters before the U.S. Department of Education, Office of Hearings and Appeals, and in administrative matters before national and regional accrediting agencies as well as state regulatory agencies. He has also counseled clients in the regulatory aspects of ownership changes and substantive changes resulting from mergers and acquisitions. He earned a B.A. from The College of the Holy Cross and a J.D. from Catholic University. Steve can be reached at stchema@ritzert-leyton.com or 703.934.9835.

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56

PETER LEYTON, ESQ.

FOUNDING PARTNER, RITZERT & LEYTON PC

Peter heads Ritzert & Leyton PC's Higher Education Practice Group. Since 1980, Peter has represented many institutions of higher education, publicly traded companies, private investment groups and others with respect to resolving regulatory/ compliance matters as well as with respect to achieving desired transactional results through mergers, acquisitions and reorganizations. The firm has eight attorneys involved in work involving the postsecondary education sector and is regularly involved with the U.S. Department of Education (DOE), national, regional and programmatic accrediting agencies, state licensing and other regulatory agencies and other third parties. Peter has served three two-year terms on the Association of Private Sector Colleges and Universities and predecessor board of directors. He received his law degree from Catholic University School of Law in 1980, a master's degree in public administration from American University in 1974, and a bachelor's degree in political science from Antioch College in 1971.

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