



Appendix C: FFEL Reporting Meeting Minutes

1st Meeting: FFEL and Student Enrollment Data Flow Option Analysis
Date: March 24th, 2004

Objective

Kick-off meeting to discuss efforts, participants, and timeline.

Agenda/ Attendees

The agenda items for this meeting were:

- Data Strategy Overview
- Purpose of FFEL and Student Enrollment Data
- FFEL Reporting Considerations
- Student Enrollment Reporting Considerations
- Approach
- Participants
- Timeline

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FFEL and Student Enrollment Data Flow Option Analysis

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Topic 1: Data Strategy Overview

Presenter: Jason Patton – Keith Wilson

Handouts: FFEL and Student Enrollment Data Flow Option Analysis slide deck

Key points/Decisions Made:

- Keith encouraged “Vision without constraints”
- Subject Matter Experts should provide input to help with options

Comments from the group:

- Need to review Data Strategy I Data Quality Issues for relevant topics/suggestions
- PEPS representatives should attend meetings (Molly Wyatt)



Issues:

- Will system or business process changes require legislative changes?

Topic 2: FFEL and Student Enrollment Reporting Efforts

Presenter: David Marker

Handouts: FFEL and Student Enrollment Data Flow Option Analysis slide deck

Key points/Decisions Made:

- A clearly defined target state vision for FFEL and Enrollment Reporting will drive the placement of NSLDS in the Target State
- Not only look at pros/cons, but considering both problems and opportunities when looking at options

Comments from the group:

- Consider Common Loan ID #
- Define scope of options - viable options should mean practical and realistic options
- The FFEL information provided externally by Meteor could provide some insight into what level of service FSA should provide

Next Meeting

- Date/Time: 4/1-4/6
- Topic: Current State/Business Objectives Discussion
- Presenter(s): Pam Eliadis, David Marker



2nd Meeting: FFEL Data Flow Option Analysis - Current State Analysis & Business Objectives

Date: April 1st, 2004

Objective

Working session to review and define Current As-Is Process Flows and to discuss business objectives.

Agenda/ Attendees

The agenda items for this meeting were:

- Purpose of FFEL Reporting Deliverable
- Approach
- Confirm As-Is Process Flows and Data Flows
- Discuss Business Objectives
- Timeline for FFEL Flow Option Analysis
- Next Steps

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Data Strategy 2.0
Data Framework
Data Strategy Target Vision

FFEL and Student Enrollment Data Flow Option Analysis

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Topic 1: Review Current As-Is Process Flows for FFEL Reporting

Presenter: David Marker

Handouts: FFEL Data Flow Options Analysis slide handout, As-Is Process Flow diagrams, As-Is Data Flow diagrams

Key points/Decisions Made:

- Reviewed each step of As-Is Process flows for FFEL Reporting in O&D/Repayment, Repayment-Sales/Transfers, Repayment-Disability, Consolidation, Collections and Oversight.
- Received feedback and clarification on each process flow and made changes where it was necessary (*see updated diagrams*).

Next Meeting

- Date/Time: 4/15/2004
- Topic: Target State Visioning/Business Objectives Discussion
- Presenter(s): Pam Eliadis, David Marker



3rd Meeting: FFEL Data Flow Option Analysis - Target State Visioning
Date: April 14th, 2004

Objective

Working session to discuss potential options for FFEL Reporting in the Target State.

Agenda/ Attendees

The agenda items for this meeting were:

- Approach
- Target State Background
- Target State Objectives
- Identify and Discuss Target State Options
- Next Steps

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Topic 1: Discuss Target State Options for FFEL Reporting

Presenter: David Marker

Handouts: FFEL Reporting Data Flow Options Analysis - Target State Visioning slide handout

Key points/Decisions Made:

- Confirmed and suggested more usages for FFEL Reporting in Target State. Items discussed in addition to those listed on the presentation included:
 - Ensure accurate calculation of performance metrics (e.g., CDR)
 - Support Department financial statements and monitoring of Trading Partner compliance
 - Streamline the subrogation process, make the transition of defaulted loans to CSB “seamless”
 - Enable student eligibility monitoring
 - Potentially facilitate default aversion. However, there has been pushback from the community to not have to provide this information
- Identified and discussed four possible options for FFEL Reporting in the Target State. The following updates were suggested for each option:
 - Current State translated to Target State
 - It was noted that there should be an arrow from CDA to PPM
 - The Data Strategy I background of PPM was discussed. The Target State functionality of PPM and FMS data store in the CDA are currently captured by FMS in the As-Is State
 - Lender reports FFEL details
 - To have lender report FFEL details may require legislative and regulatory changes
 - As this option is analyzed further, what is required for FSA to support Lenders sending directly needs to be considered
 - Lenders should have all guarantee information. If they do not currently, this option should require lenders to receive this information form GAs and provide to FSA
 - Increased role for O& D
 - O&D would be able to run some edit checks that would be common to all loan types (DL, FFEL, Campus Based)



- O&D does not store the data, it processes the data and then stores it in the CDA
- There could be to options for increased monitoring of FFEL disbursements: Checks required before disbursements made (or could disburse but be risk of being deemed invalid) and Checks are performed of disbursements that have already been completed. Need to consider what records, if any, would be rejected
- As this option is considered more there needs to be consideration of consolidated loans
- Increased role for IPM
 - IPM should be oversight for partners, not student level detail and operation reporting. Having IPM receive loan details was dismissed by the group
 - The potential for IPM to receive summary Partner participation data such as financial statements was discussed (data that cannot be derived from loan level details)
- For all options, the idea of Common Ids for the borrowers and their loans was discussed and identified as an important element to allow for 'seamless' communication between FSA systems and partners for a given loan
- For all options, the potential of 'reversing' the arrows was mentioned. In other words- FSA holds no FFEL data. Information is held somewhere else and FSA goes and looks at it when it needs it. Look at what Meteor does now. While this possibility was discussed in the past, there has been consolidation in the market that may make this option more feasible

Next Meeting

- Date/Time: 4/16/2004
- Topic: Create Limit List of 3 Options
- Presenter(s): Pam Eliadis, David Marker



4th Meeting: FSA Data Strategy FFEL Data Flow Option Analysis - Options Short List Options

Date: April 16th, 2004

Objective

Working session to discuss if the three proposed options for FFEL Reporting in the Target State are the three that we want to move ahead with and discuss gaps/pros/cons for each one, respectively.

Agenda/ Attendees

The agenda items for this meeting were:

- Briefly review objectives
- Overall Considerations
- Goals for this meeting
 - Are there anymore options that should be considered?
 - Create short list of options for further evaluation.
- Next Steps

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Data Strategy Target Vision

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FFEL and Student Enrollment Data Flow Option Analysis

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Topic 1: Discuss Short List of Options for FFEL Reporting

Presenter: David Marker

Handouts: FFEL Reporting Data Flow Options Short List slide handout

Key points/Decisions Made:

- Discuss three options in handout and make sure we have all options on the table that we want to further analyze as possible target state for FFEL Reporting
- Review new objectives added to “How we want FFEL Reporting to be used in the Target State”
 - Last Bullet- Add Delinquency information and other information instead of just default aversion fees. There is pushback from the community to give this information but the pushback comes from the amount of work it would take to get this info to FSA. Also FSA has to give reasons to community why they need more information from them.
 - First Bullet - with regards to enabling borrowers to view their complete accurate financial aid history, this should be mentioned first in the bullet.
 - Calculation or default rates (cohort, lifetime, etc.) should have there own bullet.
- Review considerations common to each option
 - 1st bullet - person entity- DS 1 terminology
 - 2nd bullet -... “A standard for commonly identifying loans should also be considered. This will allow for a seamless transfer of loan data, including FFEL data, with Partners and internally within FSA.
 - 4th bullet - ... “The master copy of information, including FFEL information, will be held in the CDA.
 - 5th bullet - Meteor concept needs better understanding. Schedule meeting with Timothy Bornholtz to gain better understanding.

Short List Options

- Option A



- #3 in the diagram is a tape feed, this will be addressed by the FSA Gateway as it is designed in future efforts
- Subrogation and Discharge request should go to the CDA to be matched and then flow to CSB (#1 and #2 come to FFEL Servicing Reporting)
- FSA does not have accurate information, GA has the information and we don't on our loans
- FSA Gateway will alleviate community's concern of having to send data to so many different places
- Nate or Keith will discuss background of differentiating PPM from FM and ESF. There needs to be a discussion on whether PPM needs to be deleted from Target Vision and have its functions placed in FM and/or ESF
- Correction to 3) - "submit Form 2000 FFEL summary *and other information*"
- Option B
 - Is it feasible for FSA to handle Lenders sending in detail information? Lenders will not actually be sending in information, they will have Servicers do this on their behalf. There are about a hundred or so Servicers that will be doing this for the thousands of Lenders.
 - Why do we go to GAs now, what is there value added? (Kristie Hansen will provide existing documentation about need for GAs role)
- Option C
 - FSA collect only detail information. There is pushback from community if FSA will calculate payment instead of them giving balances on what is owed to them. Some have the thought that the FSA payments will be inaccurate. The community would still need their systems to check the balances so there will be no huge cost benefit to them.
 - Push from OMB to be able to fully substantiate the partners' payments.
 - Related to O&D there was question as to whether the information be sent into FSA then the loan disbursed or should Lenders disburse loan then report (as they do now). Response- Impossible to send it in before disbursed...won't happen.
 - Further discussion required on role of O&D, many in room feel that this is not disbursement function it belongs in FFEL Servicing Reporting.
 - side note - if loan is sold middle of period they pay two Lenders.
 - side note - Non-payment loan summary information could also be calculated if the correct details are available
- Anymore options?
 - Lender data is issue, lender timing is an issue. Never been a requirement from a GA to get info from Lender on timely basis.
 - Two questions today.



- 1) Should FSA be receiving data from Lenders or GAs.
- 2) Should we calculate payments from the details or should they give balances.
- Another option - School sends in information. This is seen as not being a viable option.
- Side note - for consideration by CSB is how Rehabilitated FFEL loans should flow from CSB to the new loan servicer.

Next Meeting

- Date/Time: 4/23/2004
- Topic: Analyze Options (short list)
- Presenter(s): Pam Eliadis, David Marker



5th Meeting: FFEL Data Flow Option Analysis - Option A & B Consideration/ Pros/ Cons

Date: April 23rd, 2004

Objective

Working session to discuss the considerations, pros, and cons for Option A and B for FFEL Reporting in the Target State.

Agenda/ Attendees

The agenda items for this meeting were:

- Review and Finalize FFEL Reporting Objectives
- Option A Diagram - GA Reports Details (Current State)
 - Considerations/Pros/Cons
- Option B Diagram - Lender Reports Details
 - Consideration/Pros/Cons
- Next Steps

Invitees were as follows. Attendees marked with an X.

Name	Attendance	Business/System Area	E-Mail	Phone (Work)
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Data Strategy 2.0
Data Framework
Data Strategy Target Vision
FFEL and Student Enrollment Data Flow Option Analysis

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Keith Wilson		FSA/CIO	keith.wilson@ed.gov	202.377.3591
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Topic 1: Discuss Options A & B

Presenter: David Marker

Handouts: FFEL Reporting Data Flow Analysis Option A & B Handout

Key points/Decisions Made:

- There will be a separate meeting for PPM explanation and Meteor (fetching) discussion. Pam will set up attendee list for both of these meetings.
- Reviewed FFEL Reporting Objectives and made updates
- OBJECTIVES
- How will FFEL Reporting be used in the Target State?
 - Receive accurate FFEL Data in a timely and efficient manor
 - Substantiate/Calculate Partner Payments and Receivables (GAs and Lenders)
 - Provide GAs, Lenders, Schools, and FSA with an “Integrated Student View” and will enable Borrowers to view their complete, accurate financial aid history
 - Facilitate Ombudsman Case Tracking
 - Correct calculation of Cohort Default Rate
 - Ensure accurate calculation of performance metrics (e.g., lifetime default rate)
 - Allow FSA enterprise analytics to be based off of accurate FFEL details
 - Support Department financial statements
 - Enable monitoring of Trading Partner compliance
 - Enable student eligibility monitoring
 - Streamline the subrogation process; make the transition of defaulted loans to CSB “seamless.”
 - Potentially facilitate default aversion.
- Option A
 - Considerations
 - Common editing rules for GAs would ensure greater reporting consistency.



- While there is currently timing issues, these issues are not necessarily due to the fact that GAs are reporting. FSA could possibly change regulations and statutes and get the data from the GAs in a timely manner (monthly or more often)
 - Lenders likely will not like the idea of getting paid off of loan details reported by the GAs.
 - The oversight role of GAs over lenders provides audits of lenders and edits of their data.
 - A common and unique loan ID should be part of the Target State vision. The ID will allow for easier transfer and matching of data.
 - The Target State should require lenders to tie underlying loans to consolidated loans.
 - The FSA Gateway will provide a standardized means and uniform approach for Trading Partners to interface with FSA. A separate meeting will be held to explore information concerning Meteor and the potential for the FSA Gateway to incorporate a “fetch” strategy for FFEL data.
- Pros
 - While there could be changes to the frequency of reporting, the technology for reporting, and the fields that are reported, the changes required for FSA and Trading Partners (GAs, Lenders, Servicers) would be less for this option than for the option for which the lenders report the FFEL details.
 - GA's bridge the gap between the loan identifiers and the Lenders'/Servicers' systems and the loan identifiers used in NSLDS. They filter loan information and match loan data.
 - Interfaces and feeds remain consolidated because information is coming in from only 36 GAs, not approx. hundred Lenders/Servicers.
 - GA audits of lenders are assuring reasonability, if FSA receives directly from lenders there is likely an increased cost for FSA to perform audits of the lenders reporting
 - Cons
 - No assurance that we have original information from lenders.
 - There currently are no standardized edits that all GAs use.
 - Some loan updates never reach NSLDS because of loan edits and the data feed process.
 - Inefficient- GA acts as a middleman in a process where it may not be necessary for them to do so.



- May be hard to calculate or even substantiate lender payments based on what GAs send and when they send it
- Option B
 - Considerations
 - Majority of Lenders use Servicers who would be responsible for sending data to FSA. FSA would receive files from about a hundred Lenders/Servicers, not thousands of Lenders.
 - FSA would need to create a contract with Lenders/Servicers (similar to a GAs current contract with Lenders/Servicers) in order for FSA to receive loan level data.
 - A common and unique loan ID should be part of the Target State vision. The ID will allow for easier transfer and matching of data.
 - The Target State should require lenders to tie underlying loans to consolidated loans.
 - Assumption: Lenders/Servicers will be required to submit data electronically.
 - GAs still need to have loan information. FSA requires GAs do audits on 10 lenders every 2 years. FSA may have to increase its role in the audit and oversight of lenders' reporting if it receives data directly from the lenders.
 - GAs could get the lender information from FSA (CDA), otherwise the lenders would have to report to both FSA and the GAs.
 - Pros
 - FSA is assured it has the data the lenders have
 - Submitting loan level detail directly to FSA will remove GAs as a layer of reconciliation that may cause issues regarding data integrity and timing.
 - Allowing Lenders to directly submit loan detail data to FSA would facilitate the Lenders desire to be paid promptly on submission of loan level data.
 - Cons
 - FSA would have to increase its number of interfaces to receive feeds of FFEL data because it will be receiving information from a hundred or so Lenders/Servicers as opposed to the current 36 GAs.
 - Lenders may pushback because they will need to update all their electronic capabilities to send/receive loan data with FSA. May need added incentive for lenders.



- GAs may pushback because they are losing some of their "control." Risk of being made irrelevant if FSA becomes universal guarantor, loan processor for Lenders.
- GAs may not like fact that their AMF calculations and payments will be based of data that they did not provide to FSA, again may see this as a loss of control in process.
- If GAs still have to send their supplementary data (e.g. guarantee date) to FSA, FSA will now be responsible for matching the supplementary data with the loan detail information sent by the Lenders. If Lenders are required to send in guarantee information, they will be responsible for maintaining more information than they currently are required.
- Increased control and oversight work for FSA.
- For GAs to continue to receive FFEL data, either lenders will have to report twice (once to GA once to FSA) or FSA will have to create a new feed of the lender data to the GA.

Other Meeting Comments:

- One of the main problems now is the timing of the reporting. FSA can change that without necessarily changing who is sending the information.
- Lenders most likely will pushback getting paid off NSLDS information if it is reported by GAs.
- OMB is pushing for substantiating payments from details.
- GAs have asked FSA (many years) to support them in trying to get information from lenders on a more frequent basis.
- Consensus reached that there needs to be more frequent reporting. Frequency will depend on what information is being reported and we need to find out optimal time for reporting each item (cancellations, loan status changes, eligibility issues, and disbursements should be reported as soon as they occur)
- Need to consider regulations to require lenders to report more frequently than quarterly to GAs. Lenders don't want to allocate resources to this if they don't have to.
- Commonline was implemented in 1995 in the community. Although the commonline provides standard fields for reporting loan ids, different partners are using different methods for establishing an id. If FSA was the first entity to touch the loan it could possibly establish the loan ids. A common (unique) loan id- will help track a loan. This is important for identifying underlying loans in a consolidated loan.

Next Meeting

- Date/Time: 4/29/2004
- Topic: FFEL Reporting Community Meeting



Data Strategy 2.0
Data Framework
Data Strategy Target Vision
FFEL and Student Enrollment Data Flow Option Analysis

- Presenter(s): Pam Eliadis, Ron Bennett



6th Meeting: FFEL Data Reporting Target State Visioning Community Meeting
Date: April 29th, 2004

Objective

Working session to analyze the current FFEL Reporting process and collect inefficiencies, problems, and recommended target state solution options from the community participants.

Agenda/ Attendees

The agenda items for this meeting were:

- Oracle 11i Update
- FFEL Reporting Objectives
- Current FFEL Reporting Process
- Issues
- Solutions

Invitees were as follows. Attendees marked with an X.

Name	Attendance	Name	Attendance
Lee Avery	X	Greg Van Guilder	X
Jeff Baker		Kevin Woods	X
Ron Bennet	X	Dana Purdy	X
Tim Bornholtz	X	Diane Boatman	X
Tim Cameron		Ken Butz	X
Katie Crowley		Kathy Bliss	X
Pam Eliadis		Joe Chulak	X
Matteo Fontana		Jim Yoder	X
Anthony Gioffre		Judy Martin	X
Katie Hansen		Dennis Kemp	X
Nettie Harding	X	Catherine Kamery	X
George Harris		Lisa Hammers	X
Maureen Harris	X	Brian Gray	X
Cynthia Heath	X	Cathy Wotring	X
Paul Hill Jr.		Rick Edington	X
Gary Hopkins		Mike Balogh	X
Melba Houston	X	Linda Mollica	X
Denise Leifeste		Beth Wicks	X
Pamela Moran		Geneva Coombs	X
Andy Ngassa		Shirley Wheeler	X
Linda Paulsen		Sandra McCullough	X



Name	Attendance	Name	Attendance
Frank Ramos		Adele Gabrielli	X
Angela Roca-Baker	X	Jason Patton	X
Sandra Simmons		David Marker	X
Susan Szabo		Harjote (Joey) Randhawa	X
Katrina Turner			
Dwight Vigna			
Marge White			
Calvin Whitaker	X		
Keith Wilson			

Topic 1: Oracle 11i

Presenter: Maureen Harris

Handouts: Oracle 11i Slide Deck

Introduction Key Points

- Consolidate OCFO & FSA accounting systems – 1 solution
 - Form 2000/LARS/LAP integrated with current FSA/FMS
- Improve efficiency of ED's financial systems & operations
- Take advantage of Business Process Re-engineering
- Apply Lessons Learned
- Implement Best Practices
- Implement or improve audit trails from feeders to Core
- Summarize feeder data (ID level of detail needed)
- Consistent formats from feeders
 - CSB, COD, CDDT, LAP/LARS, Form 2000
- Streamline processes
- Ensure coordination with FSA initiatives (data strategy, CSB efforts, FEBI, etc.)
- Form 2000 and LaRs form currently have hooks into the FMS system. Currently deciding whether it should remain as it is, if it should migrate code and extensions into new Oracle 11i, or if they should completely change the way information is being sent in.
- fy2007 Oracle 11i will be live.
- End goal is to improve efficiency of ED's financial system.
- If there are suggestions or ideas on better ways to report please send them Judy.
 - For Forms 2000 there is a "issues list" already in the works.
- Implement consistent format for feeder systems

Accomplishments to Date

- Business Process Review ("As Is")



- High Level Requirements Sessions
 - Common Services for Borrowers (“CSB”)
 - Common Origination and Disbursement (“COD”)
 - GA Community
 - Lender/Servicer/Secondary Market Community
 - LEAP/SLEAP Community
- CFO Re-engineering Sessions
- Analysis of GA/Lender Issues

Questions from Community

- Yesterday’s meeting discussed changes that will be made to the Forms 2000 instructions. These changes are for 2005, if the Oracle 11i is finishing in 2006. Won’t the instructions have to change again after only one year of use.
 - This will be taken into account
 - Any other questions please send through Judy.

Topic 2: Background and Objectives for FFEL Reporting Target State Effort

Presenter: Ron Bennett

Handouts: FFEL Reporting Community Meeting Handout

The Data Strategy I effort began creating a Target State Vision for FSA. In the initial Data Strategy effort, FFEL Reporting was not fully addressed and is subsequently being examined now. FSA has begun collecting objectives to guide the target state FFEL Reporting effort. The following list of objectives represent items previously collected by FSA and those added in this meeting:

Target State Objectives for FFEL Reporting:

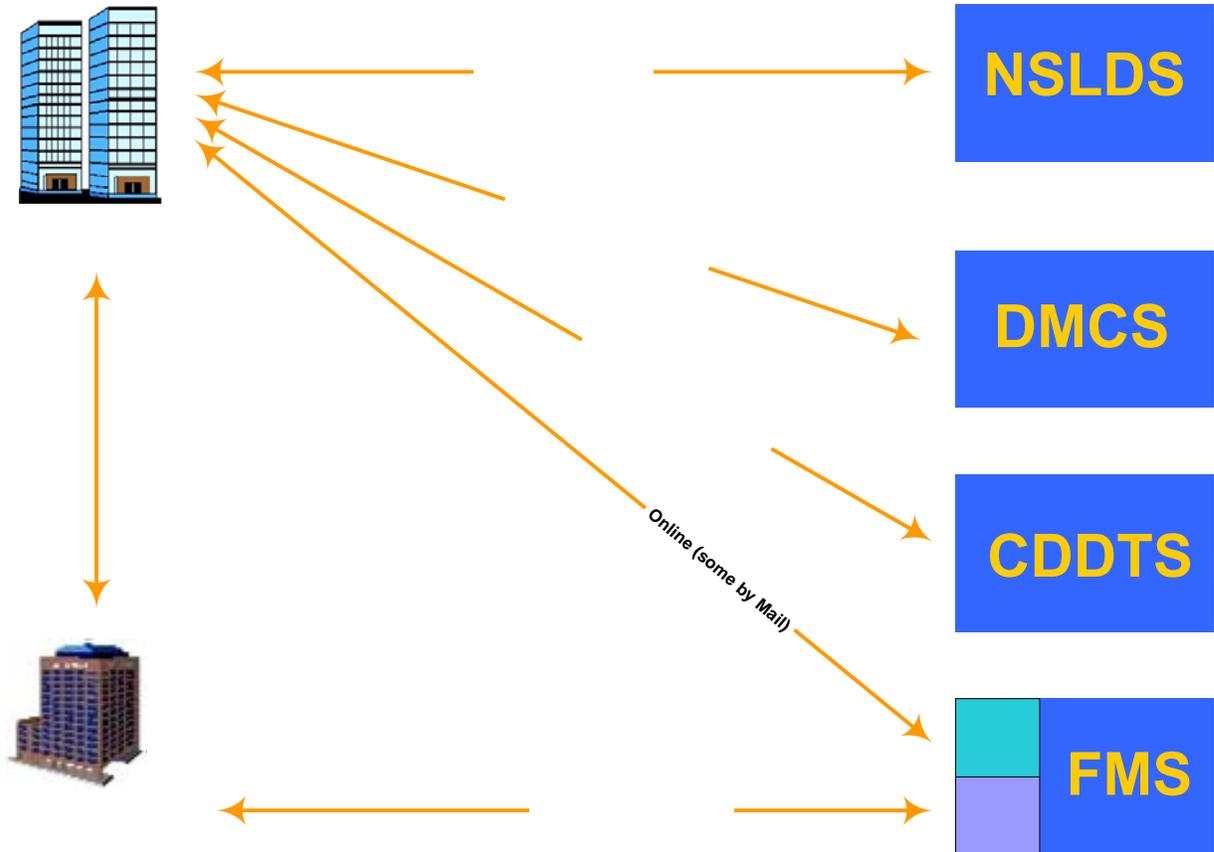
- Receive accurate FFEL Data in a timely and efficient manor
- Substantiate/Calculate Partner Payments and Receivables (GAs and Lenders)
- Provide GAs, Lenders, Schools, and FSA with an “Integrated Student View” and will enable Borrowers to view their complete, accurate financial aid history
- Facilitate Ombudsman Case Tracking
- Correct calculation of Cohort Default Rate
- Ensure accurate calculation of performance metrics (e.g., lifetime default rate)
- Allow FSA enterprise analytics to be based off of accurate FFEL details
- Support Department financial statements
- Enable monitoring of Trading Partner compliance
- Enable student eligibility monitoring
- Streamline the subrogation process, make the transition of defaulted loans to CSB “seamless.”



- Potentially facilitate default aversion.



The current state of FFEL Reporting at a high level was briefly discussed using the following diagram:



Topic 3: Issues and Inefficiencies

Presenter: Ron Bennett

The floor was opened for input regarding the current issues and inefficiencies with FFEL Reporting. The following is a list of issues:

- Issue with the NSLDS editing of “all or nothing” acceptance of information. This needs to change so that the only incorrect information is not accepted, not all information rejected if one item is missing or wrong.
- Analysis of data being received.
 - What does FSA not need that they are getting?
 - What is redundant?
 - What does FSA need that they are not getting?
- Evaluate existing payments calculated by NSLDS
 - Community does not want FSA to calculate payments.

Guaranty Agency



- Payments based on “Lenders” data (although it goes through GA)
- FSA not taking information directly off GA database. Problems with errors, (errors preventing payment).
- GAs cost occurs at time of guarantee not time of disbursement. Why get paid on loans that are disbursed but not paid on loans that are cancelled? It is the same amount of work.
- Frequency of reporting is an issue. Transaction based reporting mechanism to address problem of frequency.
- Identifier conflict resolution
- Cannot track underlying loans after they are consolidated.
- Issues with loan tracking and data reconciliation
- Appropriateness of editing
- Subrogation data elements
- Issue with the data that GAs are sending into FSA. GAs want to know how it is being used. So they can understand what they are really sending, is it the right stuff, maybe they can send other information that will better aid FSA.

Topic 4: Problems

Presenter: Ron Bennett

The floor was for discussion and input concerning any problems with the current state of FFEL Reporting. The following is a list of problems:

- Inability to load data as a result of editing
- Foreign school reporting, clearinghouse relationship, multiple issues
- GAs bottom line
- Ability to substantiate financial reporting
- High risk list
- Disconnect with subrogation vs. other processes (i.e. NSLDS)
- Duplicate loans – borrowers get lost in the system
- FSA system inconsistencies
- Student Eligibility
- Students/Borrowers can’t view their updated information
- Borrower privacy
- School supplying discharge information. Information is not getting out there.

Topic 5: Potential Solutions

Presenter: Ron Bennett

The floor was then opened for input potential solutions to the current issues and inefficiencies with FFEL reporting. The following is a list of potential solutions:



- SSIM
- RID
- Common Record
- Data dictionary
- Block editing - when GAs send information and one item is wrong, NSLDS will reject the whole file. NSLDS needs to accept the correct information and send back what is incorrect so only updates need to be made and the whole file does not need to be resent.
- Get additional/needed data to support business processes (i.e. Aggregates, CDRs, etc)
- Meteor - better exchanges of data -portal technology
 - Better use of technology to get data needed when it is needed.
- Single method to interface with FSA
- Ability to send "changes" only
- Get the right data from the right source at the right time
- They want more of an invoice approach, "Bure Bones" (?This is not right)? Invoice approach for GAs and Lenders.
- If the data is already there why do we need to send it in again? FSA should just ask for what they need. Analyze attributes on financial report, Does FSA already have the data?
- Better access tools
- Self Service Capabilities
- Lenders would like to run queries. GAs would like to be able to run more queires.
- Enhance web capabilities/ products
 - This worked great for student complaints



7th Meeting: FFEL Data Flow Option Analysis - Backend Options A & B
Consideration/ Pros/ Cons

Date: May 3rd, 2004

Objective

Working session to discuss the considerations, pros, and cons for the backend Options A and B for FFEL Reporting in the Target State. This will determine the data distribution among FSA Business Capability Areas and Enterprise Shared Function in the Target State.

Agenda/ Attendees

The agenda items for this meeting were:

- Option A Diagram –FFEL Servicing Reporting receives and edits data, BCAs access data from CDA
 - Considerations/Pros/Cons
- Option B Diagram – BCAs receive and edit data and then it is stored in CDA
 - Consideration/Pros/Cons
- Objectives
 - Use to Determine Pros/Cons for Options
- Next Steps

Invitees were as follows. Attendees marked with an X.

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Bob Bridgeman				
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**Data Strategy 2.0
Data Framework
Data Strategy Target Vision**

FFEL and Student Enrollment Data Flow Option Analysis

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Topic 1: Discuss Options A & B

Presenter: David Marker

Handouts: FFEL Reporting Data Flow Analysis Backend Options A & B Handout

Key points/Decisions Made:

Option A

- Change number 2. Data will be sent and stored in the CDA. CSB will access the necessary data from the CDA.
- FFEL Servicing Reporting will do common edits for data that is stored in CDA. (not being edited/processed by Business Capability Area first).
- PPM will not directly receive FFEL Data. PPM will make payments based on information that is stored in the CDA. Summary and detail data will both go through FFEL Servicing Reporting.
- No creation of a new record for subrogated, disability, they are matched to existing loan info that is in the CDA.
- In regards to data being sent to wrong place, if GA sends one feed, xml will differentiate, but GAs will have to send it in properly.

Option B

- Differences between Options A and B are that the edits/processing are done in Business Capability Areas, not in CDA.
- Correction to diagram
 - Remove out disbursements in 1 and leave it in 4.
 - 2 should technically be going through CSB, if we are going to stay consistent with premises of this Option.



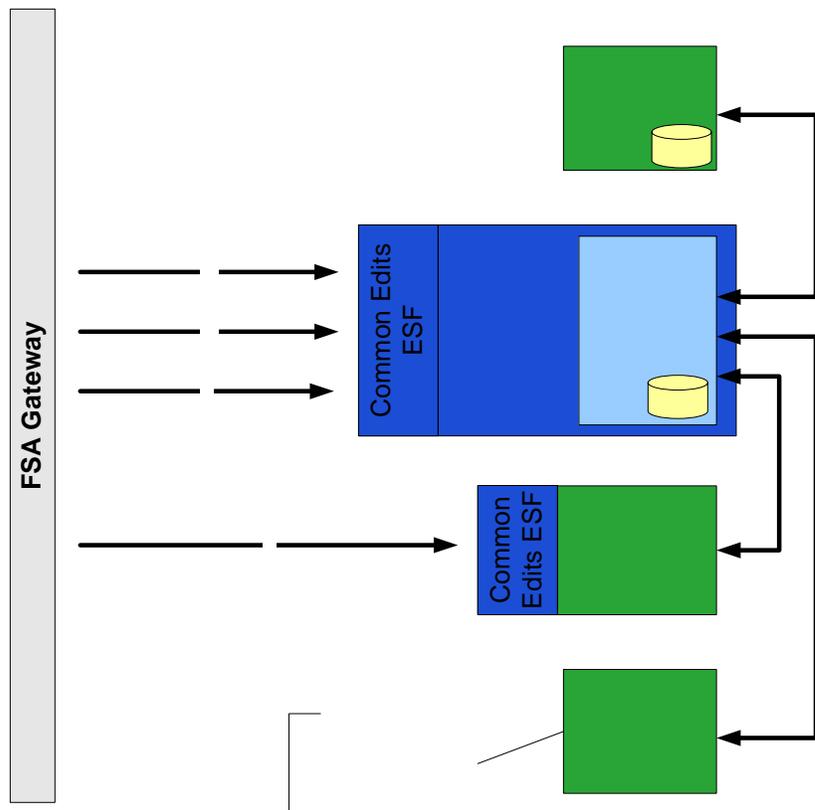
Other Discussion Points Leading to Final Option

- Edits should be a shared service. We do not want different edits in different systems. Edits in different systems cause a problem now.
 - Do not want redundancy in coding for edits.
 - We need to do edits on data sent from GA, even though GAs already edit this data from the Lenders. Tell community what expectations are and then do edits.
 - Develop “common origination edits”, “published edits,” “common public edits” before data goes through FFEL Servicing Reporting and O&D, to be stored in the CDA.
 - Regarding edits there needs to be a consensus later on with regards to the detail of edits.
 - Establish what edits FSA needs based on the data.
- Lenders are sending in information after loan has been disbursed. FSA should not get to a level where they pre approve a FFEL, but should get to a level where FSA has some control (making sure there is a FAFSA to backup loan, etc.) Not at same level as DL because FSA is not the Lender, but to a certain level where FSA can tell Lender they have lost reinsurance or loss of interest subsidy if Loan is not disbursed and tracked properly.
- Establishing a loan needs to be common service.
- Operationally we need to have some plan to address data inaccuracies.
- Direct Loans Reporting should be shown to compare to FFEL. DL goes through O&D and servicing to CSB then data is stored in the CDA.
 - DL and FFEL should go through some common editing.
- Redundant information being sent in regarding claims. Claims are sent in detail level, so it is not necessary to also send summary of claims. This can be calculated by FSA.
 - But you cannot get all summary data from details (fund balances, reserves, etc.)
- This discussion of making payments on detail data will be further analyzed as part of the Functional Gap Analysis.
- OMB wants to see analysis of making payments based on details.
 - FSA is not ready to handle making payments of details. Unless details are very accurate it will cause huge problems and will not be an improvement.
 - A lot more information will have to be collected; it is a very big change.
- Initial Suggestion: FSA make payments on claims based off details. Subsidy, fees, allowances, etc payments based off summary data received.



Recommended Backend Option

- Data 1, 2, 3 (all FFEL Reporting except O & D) will be sent from the FSA Gateway to FFEL Servicing Reporting. Before it is processed by FFEL Servicing Reporting and stored in the CDA it will go through common edits. These common edits will also edit FFEL disbursement data that is processed by O & D and stored in the CDA.
- The Diagram is updated below to include Direct Loans to help illustrate the use of Common Edits ESF.



Next Meeting

- Date/Time: 5/11/2004
- Topic: Final FFEL Reporting Options (GA vs. Lender Reporting Directly)
- Presenter(s): Pam Eliadis, David Marker



8th Meeting: FFEL Data Flow Option Analysis – Define Recommendation
Date: May 11th, 2004

Objective

Working session to discuss and define the final recommendation for FFEL Reporting in the target state.

Agenda/ Attendees

The agenda items for this meeting were:

- Define Recommendation
 - Option A (current process translated into target state and FFEL Servicing shared function processes all FFEL data before storing in CDA)
 - Option B (FFEL loan holder reports details and FFEL Servicing shared function processes all FFEL data before storing in CDA))
- Next Steps

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Topic 1: Discuss Options A & B

Presenter: David Marker

Handouts: FFEL Reporting Data Flow Define Recommendation Handout

Key points/Decisions Made:

There was consensus on the back-end option last meeting. This meeting we will be discussing front-end options for FFEL Reporting.

Option A (current state translated into target state)

CONSIDERATIONS

- Common editing rules for GAs will ensure greater reporting consistency.
- While there is currently timing issues, these issues are not necessarily due to the fact that GAs are reporting. FSA could possibly change regulations and statutes and get the data from the GAs in a timely manner (monthly or more often).
- As part of their oversight role of lenders, GAs will provide audits of lenders, edits on their detail data, claims, defaults, and guarantees.
- A common and unique loan ID should be part of the target state vision. The ID will allow for easier transfer and matching of data.
- The target state should require lenders to tie underlying loans to consolidated loans.
- In the target state all partners will be required to submit data electronically and submittals will be backed up by paper files.
- The FSA Gateway will provide a standardized means and uniform approach for Trading Partners to interface with FSA. A separate meeting will be held to explore information concerning Meteor and the potential for the FSA Gateway to incorporate a “fetch” strategy for FFEL data.

PROS



- While there could be changes to the frequency of reporting, the technology for reporting, and the fields that are reported, the changes required for FSA and trading partners (GAs, lenders, servicers) will be less for this option than for the option for which the lenders report the FFEL details.
- GA's bridge the gap between the loan identifiers and the lenders'/servicers' systems and the loan identifiers used in NSLDS. They filter loan information and match loan data.
- Interfaces and feeds remain consolidated because information is coming in from only 36 GAs, not approx. hundred Lenders/Servicers.
- GA audits of lenders are assuring reasonability, if FSA receives directly from lenders there is likely an increased cost for FSA to perform audits of the lenders reporting.

CONS

- No assurance that we have original information from lenders.
- There currently are no standardized edits that all GAs use.
- Some loan updates never reach NSLDS because of loan edits and the data feed process.
- FFEL Reporting is inherently an inefficient concept because the GA acts as a middleman in a process where it may not be necessary for them to do so.
- May be hard to calculate or even substantiate lender payments based on data GAs send and when they send it.

Option B (Loan holder reports FFEL details)

CONSIDERATIONS

- Majority of lenders use servicers who will be responsible for sending data to FSA. FSA will receive files from about a hundred lenders/servicers, not thousands of Lenders.
- FSA will need to create a contract with lenders/servicers (similar to a GAs current contract with lenders/servicers) in order for FSA to receive loan level data.
- A common and unique loan ID should be part of the target state vision. The ID will allow for easier transfer and matching of data.
- The target state should require lenders to tie underlying loans to consolidated loans.
- All partners will be required to submit data electronically and back up submittals by paper files.
- GAs still need to have loan information on the loans they are guaranteeing. FSA requires GAs do audits on 10 lenders every 2 years. FSA may have to increase its role in the audit and oversight of lenders' reporting if it receives data directly from the lenders.
- GAs could get the lender information from FSA (CDA), otherwise the lenders would have to report to both FSA and the GAs.
- FSA will have to establish an interface or feed among all lenders/servicers.



FFEL and Student Enrollment Data Flow Option Analysis

- Must define the level of reporting by lenders that is necessary for FSA to accomplish the objectives for FFEL Reporting in the target state. (i.e. necessary data for analytics, etc.)
- Small lenders may be given threshold of time where they may still run loan level details through the GA.
- Further analysis needs to be done with regards to how GAs will obtain FFELP loan level details. The lenders could also send to the, the GAs could access data from CDA, or CDA could have a feed sending data to GAs. An important factor in this determination is the consistency of data. The FFEL data FSA has must be the same for GAs. Data needs to be consistent across all trading partners.
- There are a good number of lenders who do not disburse FFELP loans anymore, but still report to GAs. They have no incentive to adapt to a new system for reporting directly to FSA. In this case they may continue to report to GAs.
- GAs will still perform their duties. They will still be responsible for their guarantee function, get defaulted loans, audits, claims reviews, etc. This option is only a matter of data flow. GAs have a regulatory role established by government, it can not change too much.
- GA fees may decrease if the cost of GA oversight of lender reporting details goes down.
- FSA should pilot this option to see if it is feasible. Partners in the pilot should not only be the large servicers, but also some small lenders to get a full spectrum of how this option will work if implemented. Also regarding editing, FSA should obtain input from the GAs on what edits they do and use their experience over the years to make FFEL Reporting transition smoothly into this option.

PROS

- Having direct feeds from the source (lenders) helps assure FSA has the same data as the lenders.
- Submitting loan level detail directly to FSA will remove GAs as a layer of reconciliation that may cause issues regarding data integrity and timing.
- Allowing Lenders to directly submit loan detail data to FSA would facilitate better reasonability/payment thresholds for lenders.
- Getting data directly from lenders will be hard to set up initially, but overtime will be worthwhile to establish this control over the FFEL Process.
- Servicers work will decrease and they would benefit from greater efficiency if they are going to send FFEL details to FSA Gateway and not 36 different GAs. The entities they report to goes from potentially 36 to 1. This is especially beneficial to large servicers that handle the majority of FFELP loans, because they can acquire the technology to perform this option relatively quickly.

CONS

- FSA would have to increase its number of interfaces to receive feeds of FFEL data because it will be receiving information from a hundred or so lenders/servicers as opposed to the current 36 GAs.



- Lenders may pushback because they will need to update all their electronic capabilities to send/receive loan data with FSA. May need added incentive for lenders.
- GAs may pushback because they are losing some of their “control.” Risk of being made irrelevant if FSA becomes universal guarantor, loan processor for lenders.
- GAs may not like fact that their AMF calculations and payments will be based of data that they did not provide to FSA, again may see this as a loss of control in process. They want to send invoices, not have FSA calculate any payments.
- If GAs still have to send their supplementary data (e.g. guarantee date) to FSA, FSA will now be responsible for matching the supplementary data with the loan detail information sent by the lenders. If lenders are required to send in guarantee information, they will be responsible for maintaining more information than they currently are required.
- Increased control and oversight work for FSA. GAs do a lot of work with lenders to get data on old loans, FSA will now be responsible.
- For GAs to continue to receive FFEL data, either lenders will have to report twice (once to GA once to FSA) or FSA will have to create a new feed of the lender data to the GA. As mentioned above in considerations this aspect will be further analyzed.

Next Meeting

- Date/Time: 5/13/2004
- Topic: Final FFEL Reporting Recommendation
- Presenter(s): Pam Eliadis, David Marker



9th Meeting: FFEL Data Flow Option Analysis – Final Recommendation
Date: May 13th, 2004

Objective

Complete the last working session discussing and coming to a consensus on a final recommendation for FFEL Reporting in the target state.

Agenda/ Attendees

The agenda items for this meeting were:

- Final Recommendation
 - Recommendation Option A (FFEL loan holder reports details and FFEL Servicing shared function processes all FFEL data before storing in CDA))
 - Recommendation Option B (current process translated into target state and FFEL Servicing shared function processes all FFEL data before storing in CDA)
- Next Steps

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Topic 1: Discuss Options A & B

Presenter: David Marker

Handouts: FFEL Reporting Data Flow Final Recommendation Handout

Key points/Decisions Made:

Recommendation Option A

Target State Considerations/Assumptions

- This option provides a recommendation for FFEL data flows and allows for future decisions regarding other areas such as Partner Payments, technology, Partner responsibilities, etc.
- Majority of lenders use servicers who would be responsible for sending data to FSA. FSA will receive files from about a hundred lenders/servicers, not thousands of lenders (Five servicers handle about 80% of FFEL portfolio).
- FSA will establish standards for edits and submission requirements (e.g., timing).
- GAs will continue to provide services of Guarantees, Oversight, Audits, Claims Processing, Default Aversion, and Servicing Defaulted Loans. GAs will determine the best method for obtaining lenders' loan specific information, either directly from the lenders or from FSA (CDA).
- A common and unique loan ID will be established. The ID will allow for easier transfer and matching of data.
- Lenders will be required to report underlying loans to consolidated loans using unique loan IDs.
- All Partners will be required to submit data electronically.
- The FSA Gateway will provide a standardized means and uniform approach for Trading Partners to interface with FSA. FSA will need to further consider enhanced technology standards and methods such as XML and "fetch".



PROS

- **Increased consistency:** GA edits on lenders' FFEL details are currently inconsistent and hinder FSA's ability to accurately and completely reflect the same information as the lenders. By getting loans directly from the lenders, FSA will be able to establish centralized, standardized edits. These centralized edits will be more efficient than FSA trying to establish, maintain, and oversee a set of standard edits for 36 GAs.
- **Increased timeliness:** Direct feeds to FSA from the lenders inherently enables improved timeliness of receiving FFEL details.
- **Improved reasonability/thresholds for lender payments:** The accuracy of reasonability/thresholds improves due to the increased consistency and timeliness of the FFEL details.
- **Simplified reporting for lenders:** Lenders only have to report to one place, FSA, rather than sending loan information to as many as 36 GAs. GAs could also simplify their collection of data by going to the CDA rather than collecting from numerous lenders.

CONS

- **Increased cost to FSA:** FSA will need additional resources for development and maintenance (e.g., mapping, reconciliation, editing) for new FFEL data flows from lenders. (Note: because technology changes such as the FSA Gateway, XML, etc. are recommended regardless of the selected FFEL reporting option, the costs difference of receiving data from lenders rather than the current method of receiving data from GAs may be marginal).
- **Increased interface cost to lenders:** Lenders will have to create an interface with FSA. Lenders may pushback because they will need to update all their electronic capabilities to send/receive loan data with FSA.
- **GA pushback:** GAs may feel they are losing some of their responsibilities and control of data concerning their guaranteed loans. Their functions will remain the same, this option addressed the issue of data flow, not the GAs control in the FFEL process.
- **Increased Oversight for FSA:** Related to maintenance cost, FSA will have to do the work of GAs for receiving data from lenders on loans not reported or updated.

Recommendation Option B

Target State Considerations/Assumptions

- Common editing rules will be established for GAs to ensure greater reporting consistency.
- Lenders and GAs will be required to report on a more timely basis.
- A common and unique loan ID will be established. The ID will allow for easier transfer and matching of data.
- Lenders will be required to report underlying loans to consolidated loans using unique loan IDs.
- All Partners will be required to submit data electronically.



- The FSA Gateway will provide a standardized means and uniform approach for Trading Partners to interface with FSA. FSA will need to further consider enhanced technology standards and methods such as XML and “fetch”.

PROS

- **Fewer interface changes:** Changes required for FSA and Trading Partners (GAs, Lenders, Servicers) would be less for this option than for the option for which the lenders report the FFEL details.
- **Consolidated data flows:** Interfaces and data feeds remain consolidated because information is coming in only from the 36 GAs (in the lender reporting option some data would still have to come from the GAs).
- **GAs provide reconciliation layer:** GAs bridge the gap between the loan identifiers and the Lenders'/Servicers' systems and the loan identifiers used in NSLDS. They filter loan information and match loan data.

CONS

- **Data is not consistent:** No assurance that we have all original information from lenders. There currently are no standardized edits that all GAs use, and some loan updates never reach NSLDS because of GA loan edits and the data feed process. Even if standardized edits are established, FSA would have increased work to ensure that all of the GAs are adhering to the edits, and if there are changes in the edit rules, FSA would have to work with the 36 GAs to update their systems.
- **Data is not timely:** Even if the timing requirements are changed to get FFEL data more frequently from GAs, GAs still have inefficiencies that currently hinder their ability to provide the data as timely as lenders would be able to send to FSA.
- **Inaccurate reasonability/thresholds for lender payments:** May not be able to provide reasonability/payment thresholds for lenders based on what GAs send and when they send it.

Next Meeting

- Date/Time: 5/25/2004
- Topic: Present Recommendation to BTIG
- Presenter(s): Pam Eliadis



10th Meeting: FFEL Data Flow Option Analysis Presentation to BTIG

Date: May 27th, 2004

Objective

Present the final recommendation for the reporting of FFEL Data in the Target State to the Business Technology Integration Group.

Agenda/ Attendees

The agenda items for this meeting were:

- The purpose and need for the recommendation of how FFEL Data will be reported to FSA in the Target State.
- The approach the working group used to come to a final recommendation.
- Current State of FFEL Reporting.
- Business Objectives for FFEL Reporting in the Target State.
- Target State options the working session came up with and discussed in order to come to a final decision.
- Final recommendation for FFEL Reporting in the Target State, including the considerations, pros and cons.

Attendance was taken by the new Integration Partner at this meeting.

Topic 1: FFEL Reporting in Target State

Presenter: Pam Eliadis

Handouts: FFEL Reporting Data Flow Final Analysis Handout

Key points/Decisions Made:

How FFEL will be used in the Target State

- Receive accurate FFEL Data in a timely and efficient manner.
- Collect data needed to substantiate partners' payments and receivables.
- Provide GAS, lenders, schools, and FSA with an "Integrated Student View" and enable borrowers to view their complete, accurate financial aid history.
- Facilitate Ombudsman Case Tracking.
- Provide data needed to correctly calculate Cohort Default Rates.
- Ensure accurate calculation of performance metrics (e.g., lifetime default rate).
- Allow FSA enterprise analytics to be based off of accurate FFEL details.
- Support Department financial statements.
- Enable monitoring of trading partner compliance.



- Enable student eligibility monitoring.
- Streamline the subrogation process; make the transition of defaulted loans to CSB “seamless.”
- Potentially facilitate default aversion.
- Ensure proper data is used for credit reform and budget modeling.

The considerations for the final recommendation of FFEL Reporting in the Target State are as follows:

- This option provides a recommendation for FFEL data flows and allows for future decisions regarding other areas such as Partner Payments, technology, Partner responsibilities, etc.
- The majority of lenders use servicers who would be responsible for sending data to FSA. FSA will receive files from about a hundred lenders/servicers, not thousands of lenders (Five servicers handle about 80% of FFEL portfolio).
- FSA will establish standards for edits and submission requirements (e.g., timing).
- GAs will continue to provide services of Guarantees, Oversight, Audits, Claims Processing, Default Aversion, and Servicing Defaulted Loans. GAs will determine the best method for obtaining lenders’ loan specific information, either directly from the lenders or from FSA (CDA).
- A common and unique loan ID will be established. The ID will allow for easier transfer and matching of data.
- Lenders will be required to report underlying loans to consolidated loans using unique loan IDs.
- All Partners will be required to submit data electronically.
- The FSA Gateway will provide a standardized means and uniform approach for Trading Partners to interface with FSA. FSA will need to further consider enhanced technology standards and methods such as XML and “fetch.”
- This recommendation does not go into detail on what data should be collected, but substantiating partner payments among other things will be factors in determining what data is collected.

The pros for the final recommendation of FFEL Reporting in the Target State are as follows:

- Increased consistency: GA edits on lenders’ FFEL details are currently inconsistent and hinder FSA’s ability to accurately and completely reflect the same information as the lenders. By getting loans directly from the lenders, FSA will be able to establish centralized, standardized edits. These centralized edits will be more efficient than FSA trying to establish, maintain, and oversee a set of standard edits for 36 GAs.
- Increased timeliness: Direct feeds to FSA from the lenders inherently enables improved timeliness of receiving FFEL details.



- Improved reasonability/thresholds for lender payments: The accuracy of reasonability/thresholds improves due to the increased consistency and timeliness of the FFEL details.
- Simplified reporting for lenders: Lenders only have to report to one place, FSA, rather than sending loan information to as many as 36 GAs. GAs could also simplify their collection of data by going to the CDA rather than collecting from numerous lenders.

The cons for the final recommendation of FFEL Reporting in the Target State are as follows:

- Increased cost to FSA: FSA will need additional resources for development and maintenance (e.g., mapping, reconciliation, editing) for new FFEL data flows from lenders. Note: because technology changes such as the FSA Gateway, XML, etc. are recommended regardless of the selected FFEL reporting option, the costs difference of receiving data from lenders rather than the current method of receiving data from GAs may be marginal.
- Increased interface cost to lenders: Lenders will have to create an interface with FSA. Lenders may pushback because they will need to update all their electronic capabilities to send/receive loan data with FSA.
- GA pushback: GAs may feel they are losing some of their responsibilities and control of data concerning their guaranteed loans.