



## Appendix D: Student Enrollment Reporting Meeting Minutes

**1st Meeting:** FFEL and Student Enrollment Data Flow Option Analysis

**Date:** March 24<sup>th</sup>, 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

Invitees were as follows. Attendees marked with an X.

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**Data Framework**  
**Data Strategy Target Vision**  
**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 consider 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:** Enrollment Reporting Data Flow Current State Analysis & Business Objectives

**Date:** April 6<sup>th</sup>, 2004

## Objective

Working session to discuss how Enrollment Reporting data is currently captured and where borrower enrollment status information resides within FSA systems.

## Agenda/ Attendees

The agenda items for this meeting were:

- Purpose
- Approach
- Confirm As-Is
- Discuss Business Objectives
- Next Steps

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## Topic 1: Introduction/Enrollment Reporting Background

Presenter: Pam Eliadis

Handouts: Enrollment Reporting Data Flow Option Analysis Current State Analysis & Business Objectives slide deck

Key points/Decisions Made:

- Pam reemphasized Keith's options approach "Vision without constraints".
- A key function of Enrollment Reporting is to allow lenders to know when to put a borrower in Repayment.

Comments/questions for future consideration:

- Point out the major holes in the current process
- Investigate whether or not schools are complying

## Topic 2: Enrollment Reporting Process Flow & Data Flow Overview

Presenter: David Marker

Handouts: Enrollment Reporting Data Flow Option Analysis Current State Analysis & Business Objectives slide deck

Key points for future consideration:

- Come up with the best and least costly option for Enrollment Reporting



- What role should a servicer (such as the NSC) play in the future? Increased responsibility? Decreased responsibility?
- Ensure that data is accurate and provided in a timely fashion
- Analyze the best method for deriving Anticipated Graduation Date
- Should fulltime and halftime enrollment status automatically change to graduated/withdrawn if no updates are received in a given time?

Comments/questions from the group:

- See Updated Process Flow Diagram
- See Topic 3: Follow-up Meeting
- Is there a new version of the Vision Framework “Bumble Bee” matrix? *It is currently under revision by BTIG and should be available shortly*

### Topic 3: Follow-up Meeting with Melba Houston (4/7/04)

Participants: Melba Houston, David Marker, Yves Louis-Jacques

Key points:

The following three enhancements were enabled a few years ago:

- **Events** – Events such as cycles, schedules, new loans, school closings, etc. can trigger enrollment reporting requests.
- **Interest** – If GA or Lender has interest in a borrower, that borrower can be added to a given roster.
- **Portfolio** – The DL and FFEL (GA/Lender) portfolios were identified and the DL contract with the Clearinghouse was established.

There was question as to what borrowers the NSC reports on as part of the DL contract:

- DLSS sends a list of DL borrowers, NOT school rosters, to NSC.
- As long as the borrower is attending a school that participates with the NSC, the NSC will report the enrollment information to NSLDS. This is regardless of whether the borrower has transferred schools or has received both FFELs and DLs.
- If the student has transferred to a school not participating with NSC, NSC will only report the student as withdrawn from the participating school and not provide any information concerning the non-participating school.

If a student transfers schools, the new school is required to add the student to their roster, although they do not always do this. If the school fails to add the student to their roster and the student does not receive any loans at the new school, NSLDS would most likely not receive any enrollment updates until the student realizes they have been put into repayment and makes a complaint.



NSLDS receives notification of deferments from GAs on their monthly NSLDS batch file. Schools can only state the student is attending or not attending. There is not a field for them to send deferment status. NSLDS evaluates which school the student is reported as attending and then adds that student to the enrollment evaluation process. If the student's last certification date is more than 180 days and their last reported status is fulltime or halftime, the student is added to the roster of the given school.

A student with an enrollment status of 'W' (withdrawn) remains on the Enrollment Reporting roster for 180 days after the enrollment status effective date and is then dropped from the Enrollment Reporting roster if the status remains 'W.' A student with an enrollment status of 'G' (graduated) remains on the Enrollment Reporting roster for 180 days after the enrollment status effective date if the student has a loan with an outstanding balance. A student reported with a status of 'D' (deceased), 'X' (never attended), or 'Z' (no record found) will not appear on the next Enrollment Reporting roster.

Bonuses for timeliness and error corrections were dropped from the NCS contract last year.

An issue with the NSLDS warning letters is that they only look at "Did the school report?" NOT "What did the school report?" Therefore, although a school may have 10,000 borrowers, as long as they report on at least 1 borrower they will not receive any warning letters.

Schools can request waivers (e.g., in the case of catastrophic events such as 9/11). These are handled manually by NSLDS such that rosters and warning letters are not generated.

Foreign schools (without online access) receive and then report using a paper roster with GAs. Because these rosters are not generated by the GAs, NSLDS does not verify whether any students are missing on the roster.

The following are a list of the NSLDS enrollment status codes:

Code	Status	Definition	Date Used as Effective Date
A	Approved leave of absence	Student is currently enrolled at this institution, but has a leave of absence approved in accordance with [34 CFR 668.22(d)(2)].	Date the student began an approved leave of absence.
D	Deceased	Student is deceased.	Date of death, if known; otherwise, the date the institution was notified of the death by a reliable source.
F	Full-time	Student is enrolled full-time, according to the institution's definition, in accordance with [34 CFR 668.2] or [34 CFR 682.200].	Date on which the student most recently began uninterrupted <sup>1</sup> enrollment on a full-time basis.
G	Graduated	Student has completed the course of study and is not currently admitted to, nor enrolled in, a different course of study at this institution.	Date the student completed the course requirements (not presentation date of the diploma or certificate).



**FFEL and Student Enrollment Data Flow Option Analysis**

Code	Status	Definition	Date Used as Effective Date
H	Half-time or more, but less than full-time	Student is enrolled at least half-time, but less than full-time, according to this institution's definition, in accordance with [34 CFR 682.200].	Date student dropped below full-time, or if half time is the original status, the date on which the student most recently began uninterrupted <sup>1</sup> enrollment on a half time or more, but less than full-time, basis.
L	Less than half-time	Student is enrolled less than half-time, according to this institution's definition, in accordance with [34 CFR 682.200].	Date student dropped below half time, or if less than half time is the original status, the date on which the student most recently began uninterrupted <sup>1</sup> enrollment on a less than half-time basis.
W	Withdrawn (voluntary or involuntary)	Student has officially withdrawn from all courses at this institution, stopped attending all classes at this institution but did not officially withdraw, or for any reason did not re-enroll at this institution for the next regular (non-summer) term without completing the course of study.	Date student officially withdraws or, in the absence of a formal withdrawal, the last recorded date of attendance. In the case of the student who completes a term and does not return for the next, leaving the course of study uncompleted, the final day of the term in which the student was last enrolled.
X	Never attended	Individual on whose behalf a loan was certified or awarded, who was admitted, may have enrolled (registered), but never attended classes at this institution. (Institution <i>does</i> have a record of the individual.)	Report certification date, as recorded in the Submittal File Header Record.
Z	No record found	Individual for whom a thorough search of the institution's records reveals no information. (Institution <i>does not</i> have a record of the individual.)	Report certification date, as recorded in the Submittal File Header Record.

<sup>1</sup> Students are considered to be in school and continuously enrolled during academic year holiday and vacation periods, as well as during the summer between academic years (even if not enrolled in a summer session), as long as there is reason to believe that they intend to enroll for the next regularly scheduled term. For example, students should not be reported as "Withdrawn" at the end of the spring term if they are expected to re-enroll for the fall term. If they do not return as expected, status must be changed to "Withdrawn" within 60 days of that determination, or within 60 days of the start of the new term, whichever occurs first, with an effective date of the last date of attendance.

## Next Meeting

- Date/Time: 4/12
- Topic: Target State Visioning
- Presenter(s): Pam Eliadis, David Marker



**3rd Meeting:** Enrollment Reporting Data Flow Option Analysis Target State Visioning  
**Date:** April 12<sup>th</sup>, 2004

## Objective

Working session to discuss how the Enrollment Reporting function will be mapped in the target state and analyze the various data source options for the request to distribution phase.

## Agenda/ Attendees

The agenda items for this meeting were:

- Purpose
- Target State Background
- Target State Role
- Identify Target State Options
- Next Steps

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## Topic 1: Enrollment Reporting Target State Options

Presenter: David Marker

Handouts: Enrollment Reporting Data Flow Option Analysis Target State Visioning slide deck

Key points for future consideration:

The group recommended the following items be considered for the Target State Role of Enrollment Reporting:

- Possibly provide complete Title IV enrollment data by collecting for Campus Based borrower's enrollment status
- Provide capability to identify in-school deferments
- If enrollment data is captured for all students, withdrawal rates may be calculated.
- Enrollment data should not only indicate when a student should enter repayment, but also indicate when a student should no longer be in repayment.
- If a school loses eligibility and does not close, they should not lose SAIG access. They should still be able to submit enrollment updates. If there is a person at the school that originally had online access to NSLDS, they can continue to submit updates online even after the school loses Title IV eligibility. The incentive for the schools to submit is to provide the service for its customer- the students.
- The group questioned why IPM was considered a mapping option. It was noted that enrollment reporting could potentially map to IPM based on it being a function related to the oversight of schools' Title IV participation. The group however felt that enrollment reporting best maps to an Enrollment Reporting Enterprise Shared Function.



- Timing is a key issue to consider in the different option scenarios.

Target Vision Options/Comments/questions from the group:

- Option A: Keep the As-Is Process with changes to the distribution
  - Enrollment Reporting will be performed basically the way it currently is with enrollment requests sent to the schools/servicers and responses sent back to FSA. Whether CSB continues with the current 'Direct Loan model' of sending a list of borrowers to a servicer needs to be considered.
  - The distribution of the enrollment data is changed such that lenders no longer receive updates from GAs but instead receive it directly from FSA. The need for a Hold Harmless letter for the lenders was stressed. It was suggested that for all of the options, lenders not have to rely on GA's to receive the updated information.
  - A pilot has already been conducted which tested the viability of sending enrollment information directly to lenders.
- Option B: Have loan servicers use disbursements to derive an Anticipated Completion Date (Dwight's Option)
  - It was estimated that 85% of borrowers would successfully be covered by this method. There would have to be exception processing for the remaining 15%. Will need to possibly generate rosters for borrowers who are falling through the cracks.
  - This option should work well for Direct Loan borrowers but may be more complicated for FFEL borrowers.
- A concern was noted for the potential of increased appeals.
- Option C: Contractors
  - There could be one or more contractors.
  - There should be two options for schools to report to the contractor.
    - School reports all enrollment- matching with portfolio or
    - School reports only enrollment related to Title IV
  - School may choose to self-report to the contractor.
  - It was noted that the NSC provides processing of school deferment forms.
  - The current Direct Loan model would be used, meaning loan servicers would send a list of all borrowers (not rosters) and in return receive enrollment updates from the contractor.
- Option D: FSA becomes end recipient
  - FSA is no longer in the business of providing enrollment information. Loan servicers work with schools/servicers to get latest enrollment status.
  - FSA receives updated enrollment information as a field in the servicers' detail loan information feeds to FSA.



- Option E: IPEDS
  - All information submitted to FSA through IPEDS. More information needed regarding IPEDS.
  - **NOTE:** Following this meeting it was determined that IPEDS does NOT receive student level enrollment data and is therefore not an option.

## Next Meeting

- Date/Time: 4/15
- Topic: Discuss Options
- Presenter(s): Pam Eliadis, David Marker



**4th Meeting:** Enrollment Reporting Data Flow Option Analysis Select Short List of Target State Options

**Date:** April 15<sup>th</sup>, 2004

## Objective

Working session to analyze and curtail the list of Enrollment Reporting options.

## Agenda/ Attendees

The agenda items for this meeting were:

- Approach
- Enrollment Reporting Objectives
- Target State Options
- Select Short List of Options
- Begin Documenting Considerations & Gaps
- Next Steps

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## Topic 1: Enrollment Reporting Target State Options

Presenter: David Marker

Handouts: Enrollment Reporting Data Flow Option Analysis Select Short List of Target State Options slide deck

Key points for future consideration:

The group recommended objectives be considered when developing the Target State Role of Enrollment Reporting:

- Facilitate loan servicers (e.g., DLSS, lenders, etc.) to determine if and when a student should enter repayment or remain in repayment by providing a consolidated, standardized mechanism for identifying a student's enrollment status
- Provide customers with enrollment status as one of the elements in the "Integrated Student View"
- Allow FSA enterprise analytics to be based off of accurate student enrollment information
- Ensure accuracy of default prevention tool reports provided to Partners (indirectly effects CDRs)



- Possibly provide complete Title IV enrollment data by collecting for Campus Based/PELL borrower's enrollment status
- Possibly collect all enrollment data, allowing for more robust analytics (e.g., time spent in school, graduation rates, withdrawal rates, etc.) and an efficient/streamlined enrollment reporting process
- Provide full FSA Gateway access for enrollment reporting (e.g., schools that lose eligibility but do not close)

Some other notes from the group included:

- The legality of collecting all enrollment information needs to be verified.
- IPEDS does not collect individual detail loan level information and is therefore not an option.

Target Vision Options/Comments/questions from the group:

- Option A: Keep the As-Is Process with changes to the distribution
  - Small lenders will be required to have the capability to receive enrollment updates directly from FSA (the lender may use a servicer but this would be according to their arrangement not FSA).
  - While there could be communication between GAs and Lenders the option diagram does not show this since this will not be the official channel for information to flow from FSA to the lenders.
  - If FSA sends information to lenders and GAs, then GAs shouldn't send the same information to the lenders.
  - Either CSB or Enrollment Reporting (CDA) could send out a list of DL borrowers to the enrollment servicer (currently NSC).
  - The Option A diagram would be more clear if the school servicers are depicted.
  - A note should be added indicating that foreign schools would still use GAs to submit enrollment information.
- Option B: Anticipated Conversion Date
  - Borrower should go to repayment at the end of the loan period + 6 months instead of estimating based on loan disbursement date.
  - What happens to transfer students or students who get loan their first year but get a scholarship the subsequent years?
  - Before the option is dropped Dwight needs to be in discussion. Transfers and new loan from different lenders should be considered.
  - If loan is originated FSA must be told, even if it's not disbursed.
  - Only the servicing side of GA should be included.
  - A separate meeting with Dwight and other SMEs should be held to further explore the viability of this option before another large group working session is held to discuss the pros/cons.



- Option C: Contractors
  - Instead of putting one contractor, break down contractor entity info Contractor A, B, C to illustrate the idea that it does not have to be just one contractor.
  - A contractor allows for
    - No rosters
    - Initial matching and screening of data
  - Schools should report all enrollment information to the contractor(s). The contractor would then be able to tell FSA when all transfers occur.
  - Standardization of enrollment reporting would streamline the process and make it more accurate.
  - Investigate whether it is legal or not to ask schools to report all enrollment. If it is possible then find out if a contractor can perform the task.
- Option D: FSA becomes end recipient
  - In this model, the loan servicers would be responsible for collecting their own enrollment information either directly from the schools or through the use of contracted enrollment reporting servicers.
  - FSA no longer provides enrollment information to the FFEL servicers.
  - FSA would receive enrollment information, but only has a field for the reporting of loan information from CSB and the FFEL community.
  - Community feedback on this option is important.
  - If this model is chosen, some of the Enrollment Reporting objectives are not met.

## Next Meeting

- Date/Time: 4/20
- Topic: Discuss Options
- Presenter(s): Pam Eliadis, David Marker



**5th Meeting:** Enrollment Reporting Data Flow Option Analysis Option A Pros/Cons and Considerations

**Date:** April 20<sup>th</sup>, 2004

## Objective

Working session to analyze and curtail the list of Enrollment Reporting options.

## Agenda/ Attendees

The agenda items for this meeting were:

- Enrollment Reporting Objectives
- Option A - Current State Translated to Target State
- Option A Considerations and Pros/Cons (Refine Option A if necessary)

Invitees were as follows. Attendees marked with an X.

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## Topic 1: Enrollment Reporting Target State Options

Presenter: David Marker

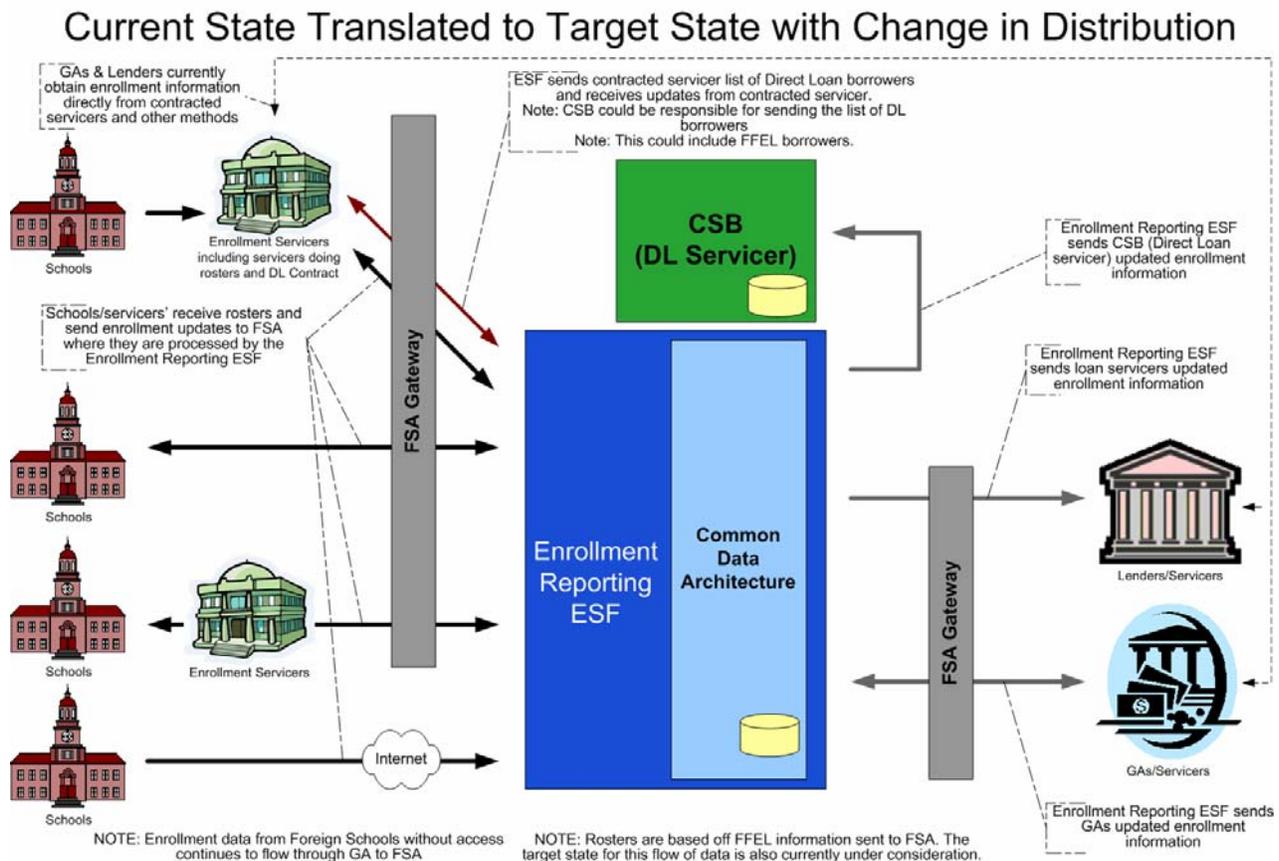
Handouts: Enrollment Reporting Data Flow Option Analysis Option A Pros/Cons and Considerations slide deck

The Target State Objectives for Enrollment Reporting were discussed:

- Facilitate loan servicers (e.g., DLSS, lenders, etc.) to determine if and when a student should enter repayment or remain in repayment by providing a consolidated, standardized mechanism for identifying a student’s enrollment status
- Provide customers with enrollment status as one of the elements in the “Integrated Student View”
- Allow FSA enterprise analytics to be based off of accurate student enrollment information
- Ensure accuracy of default prevention tool reports provided to Partners (indirectly effects CDRs)
- Possibly provide complete Title IV enrollment data by collecting for Campus Based/PELL borrower’s enrollment status. Collecting all enrollment data could allow for more robust analytics (e.g., time spent in school, graduation rates, withdrawal rates, etc.) and an efficient/streamlined enrollment reporting process
- Provide full FSA Gateway access for enrollment reporting (e.g., schools that lose eligibility but do not close, foreign schools, etc.)



Option A: Current State Translated to Target State with Change in Distribution was updated as shown below:



- Target Vision Option A Considerations, Pros, and Cons identified were as following:
  - Considerations
    - Regulations and/or a Hold Harmless Letter will allow lenders to use FSA as the master source of enrollment information.
    - Move to require foreign schools to interact directly with FSA. Until this change is made, FSA will continue to receive enrollment data requests from and send updates to GAs. This information will continue to flow in as a field on the FFEL detail feed to FSA.
    - Consider increasing oversight of reporting (currently if school reports enrollment for at least one student, even if they really have 1,000 students, no warning letter is sent out).
    - Consider increasing automation of compliance research to expedite creation of warning letters.



- Rather than CSB sending out a list of DL borrowers, Enrollment Reporting ESF could send out the list.
- No changes for requirements for timing and data have been identified for collecting information from the schools and for distributing the information to the loan servicers and GAs.
- The functionality currently provided by EDEXpress will continue to be available to schools.
- Lenders and GAs are doing what CSB does; they send extraneous information to the Clearinghouse. They shouldn't.
- In this effort the FSA Gateway is considered to provide the ideal technical data transfer method. The details of the FSA Gateway will have to be defined in future design projects.
- An agreement between FSA and a contractor should protect a student's privacy.
- Student information cannot be used for commercial purposes.
- Lenders should be required to receive electronic notification of enrollment updates.
- Pros
  - Loan servicers do not have to try to collect information from the numerous Title IV schools. They have a consolidated mechanism available for identifying a student's enrollment status.
  - Schools have flexibility in choosing how to submit information (use a servicer, FSA Gateway, online).
  - GAs and Loan Servicers receive the same updated information from one source (ESF). Lenders no longer have to work with up to 36 GAs to get information.
  - Possibly fewer process changes required for FSA and Trading Partners (Schools, GAs, Loan Servicers, etc.) when compared to the other Options.
  - By actively requesting/receiving enrollment updates, borrowers and other customers will be able to see enrollment status as an element in the "Integrated Student View."
  - Data can be more accurate since lender receives it directly from FSA (ESF).
  - Direct feed to lenders equals no real development cost to FSA (the functionality has already been developed and tested in a pilot).
  - If a contracted servicer is more fully utilized (include FFEL in the current DL model) transfers will be readily identified.
- Cons



- Although the enrollment data is consolidated, the mechanism for collecting the data from multiple sources is not fully standardized (continue to have both DL model and Roster model).
- Having multiple steps between school and lender means more time and more opportunity for data quality to decrease.
- Lenders must make changes to their systems to directly receive enrollment data from FSA.
- Based on 'rosters,' servicers do not provide enrollment status if student is actually at school other than the given roster, even if the servicer has the information (schools do this).
- Less flexibility if have a no paper option for the lenders to receive enrollment data.
- If FSA chooses Clearinghouse as a contractor, it will have a hard time working with Clearinghouse in order to get Foreign School's enrollment status information.
- Transfer students are not covered.
- No standard mechanism for inflow of data.
- Possible problem with distribution.

## Next Meeting

- Date/Time: 4/29
- Topic: Discuss Options C & D
- Presenter(s): Pam Eliadis, David Marker



**6th Meeting:** Student Enrollment Reporting Target State Visioning Community Meeting

**Date:** April 27<sup>th</sup>, 2004

## Objective

Working session to analyze the current Student Enrollment 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:

- Enrollment Reporting Objectives
- Current Enrollment Reporting Process
- What is broken?
- How do we fix it?

Invitees were as follows. Attendees marked with an X.

Name	Attendance	Name	Attendance
Beth Wicks	X	Lisa Hanners	X
Carmen Kahiu	X	Melba Houston	X
Dana Purdy	X	Mike Balogh	X
Dwight Vigna		Pam Eliadis	X
Greg Van Guilder	X	Pam Moran	
Jeff Baker		Patty Redmond	X
Joanne Antigua	X	Rick Edington	X
Judy Martin	X	Ron Bennett	X
Kathy Blyss	X	Roberta Hyland	X
Katrina Michaels	X	Tim Cameron	X
Keith Wilson		Valerie Sherrer	X
Ken Bretz	X	Jason Patton	X
Kevin Woods	X	David Marker	X
Lee Avery	X	Yves Louis-Jacques	X
Joe Chulak	X	Renee Jennrich	X
Diane Boatman	X		

## Topic 1: Background and Objectives for Enrollment Reporting Target State Effort

Presenter: Pam Eliadis



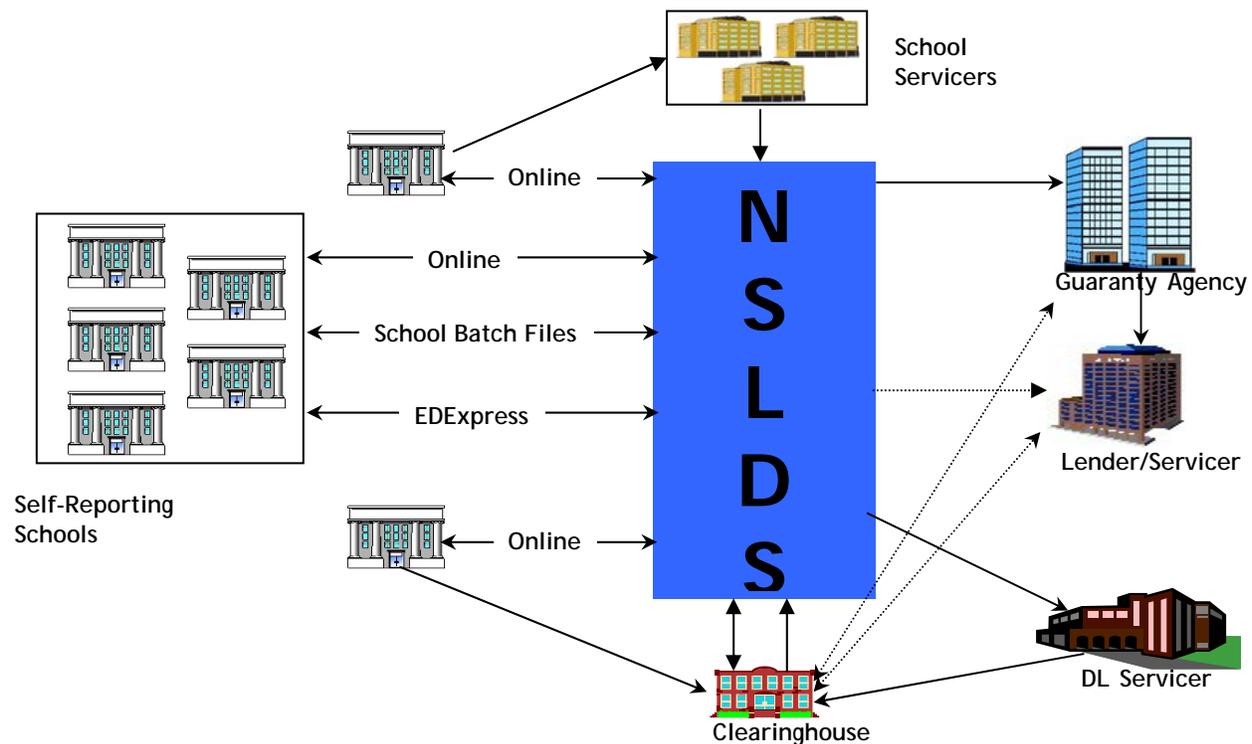
Handouts: Enrollment Reporting Community Meeting PowerPoint Deck

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

Target State Objectives for Enrollment Reporting:

- Obtain timely and accurate enrollment data
- Ensure data privacy, security, and access
- Facilitate loan servicers (e.g., DLSS, lenders, etc.) to determine if and when a student should enter repayment or remain in repayment by providing a consolidated, standardized mechanism for identifying a student's enrollment status
- Provide customers with enrollment status as one of the elements in the "Integrated Student View"
- Allow FSA enterprise analytics to be based off of accurate student enrollment information
- Ensure accuracy of default prevention tool reports provided to Partners (indirectly effects CDRs)
- Possibly provide complete Title IV enrollment data by collecting for Campus Based/PELL borrower's enrollment status. Collecting all enrollment data could allow for more robust analytics (e.g., time spent in school, graduation rates, withdrawal rates, etc.) and an efficient/streamlined enrollment reporting process
- Provide full FSA Gateway access for enrollment reporting (e.g., schools that lose eligibility but do not close, foreign schools, etc.)

The current state of enrollment reporting was briefly discussed using the following diagram (it was noted that the dotted lines indicate current available functionality that is currently not utilized or does not directly include FSA):



## Topic 2: 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 summarization of the issues:

- Lack of Single Source
- Data Quality Issues
  - Reporting inconsistencies
    - Insufficient codes and/or misuse of codes due to lack of common data dictionary/definitions
    - Lack of common industry business rules and edits
  - Data timeliness/Timing of data flow
  - Data redundancy - lack of synchronized data between schools, lenders, and servicers
  - Handling of corrections versus updates
- Reporting Compliance Issues
- Enhanced Oversight Required
- Student/Borrower Exceptions
  - Lack of student transfer information
  - Gap of attendance/Returning students



- Attendance at multiple schools
- Foreign School Reporting

The complete list of issues and inefficiencies collected were as follows:

Issues:

- Reporting Consistency (e.g., school code, defining status)
- Timeliness – of both student getting into the process and flow of the data
- PELL Code for additional locations
- Regulatory issues with Enrollment codes (e.g., G code)
- Enhance Oversight (otherwise all of this is for naught)
- Lack of information on transfer students is problem at Dept
- Returns without new aid (Gap of attending)
- Consolidation Borrowers
  - Current enrollment
  - Spousal information
- Lack of Single Source
- Hold Harmless Letter
- Handling of corrections vs updates
- Reporting & Flow of data (related to the timing issue)
- Ease of access for schools who are eligible to certify enrollment for deferments

Inefficiencies

- Multiple sources of data
- Insufficient codes (current codes do not explain all scenarios) e.g. if student withdraws on first day. And/or usage of codes. Perhaps improved Data Dictionary.
- Reporting Compliance
- Foreign School Capabilities
- Timing of data as it passes from one agency to another.
- Reliance on batch processing is really slowing down the process.
- Redundancy. Multiple Ws with multiple dates. Did they go back to school and then withdraw again?
- Lack of Common Industry Business Rules & Edits
- School offices are not talking to each other

### **Topic 3: Recommended 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 summarization of the recommendations:

- Report Enrollment Data through a Single Source
  - Review Existing and Piloted Processes
- Define Business Rules, Data Dictionary/Definitions, and Training for Data Usage
- Provide Schools with better Enrollment Reporting Tools to Enhance the Accuracy and Quality of the Data Reported
- Explore Technology Options to Increase the Frequency of Data Exchange
- Collect Total Enrollment Data
- Enhance Compliance and Oversight

The complete list of recommendations was as follows:

- Report every other month schedule set by FSA rather than them deciding. Current law only requires twice a year. Perhaps just need to better explain and publicize. Schedule does not always service the students and borrowers the best. E.g., student withdraws day after school reports then not on next roster for 60 days and then another month or something until lender knows.
- Set a requirement for status change that is borrower servicing appropriate not school schedule focused
- (CRITICAL) Improved communication, training, documentation, definitions/dictionary
- (CRITICAL) Define Business Rules for data usage
- (LONG-TERM) Real-Time exchange of data
- Explore uses of technology options to address issues
- (MOST CRITICAL) Single Source Options
  - TERP
  - Existing NSLDS Lender/Service Pilot
  - Allow FSA to act a enrollment servicer for GAs (CH to NSLDS)
  - Clearinghouse provides all FFEL data similar to DL model
- Understanding of enrollment process by oversight staff/auditors. Audit Guide
- Obtaining all enrollment data facilitates current gaps in “knowledge” of enrollment
- Business rules for concurrent enrollment. Schools have agreement but often not until the end of the semester will the one school identify the student as truly being full time
- (CRITICAL) Better Enrollment Tools for schools evaluating “accuracy” of data reported
- Facilitate needs for non-title IV loans



**7th Meeting:** Enrollment Reporting Data Flow Option Analysis Options C & D  
Pros/Cons and Considerations

**Date:** April 29<sup>th</sup>, 2004

## Objective

Working session to analyze and curtail the list of Enrollment Reporting options.

## Agenda/ Attendees

The agenda items for this meeting were:

- Option C - Enrollment Contractor
  - Considerations and Pros/Cons
- Option D - End Recipient
  - Considerations and Pros/Cons

Invitees were as follows. Attendees marked with an X.

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## Topic 1: Enrollment Reporting Target State Options

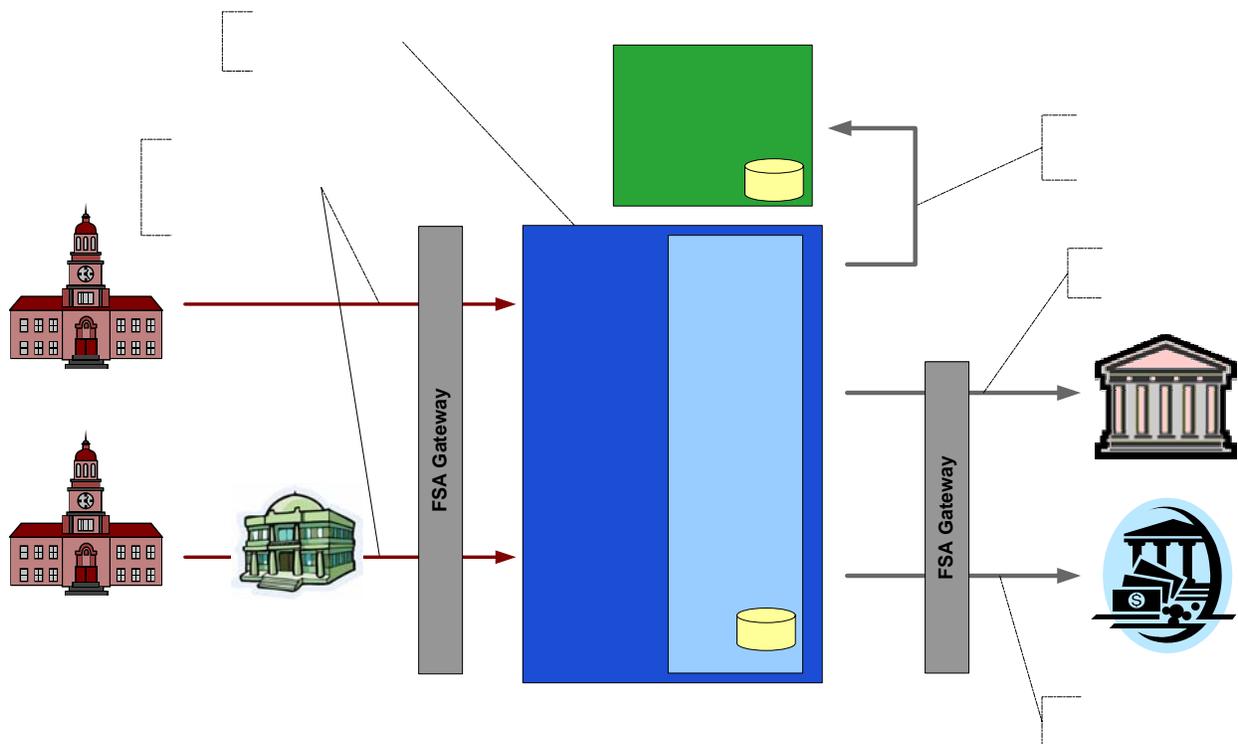
Presenter: David Marker

Handouts: Enrollment Reporting Data Flow Option Analysis Option C & D Pros/Cons and Considerations slide deck

### Key Decisions:

- At the beginning of the meeting the group agreed that Option B (Deriving an Anticipated Completion Date) should no longer be considered as a potential recommended option.
- The group updated Options C & D (see diagrams on next pages).
- Option D was determined to no longer be considered as a potential recommended option.
- Option C should be based on the assumption that FSA is able to receive all enrollment information (possibly requires regulatory and/or statutory changes).
- Option A and Option C will be compared in the next meeting to determine the final recommended option.

Updated Option C Diagram: All Enrollment Directly to FSA



Enrollment Reporting ESF possibly managed by a Contractor

- Target Vision Option C - Considerations, Pros, and Cons identified were as following.

- o Considerations

- Assumption that FSA can collect all enrollment information.
- There are no rosters sent out to schools. The schools report all enrollment information to FSA.
- The Enrollment Reporting ESF would most likely be contracted out.
- Foreign schools are required to submit enrollment data in the same manner as all other schools, either directly to FSA or through an enrollment servicer.
- Enrollment Reporting must have oversight and authority to ensure compliance. Late notifications should be sent by ESF to schools.
- SSIM logic will be used to match enrollment updates to existing student information in the CDA.
- Student privacy should be protected. Potentially less data is sent information that is not needed.
- Regulations and/or a Hold Harmless Letter will allow lenders to use FSA as the master source of enrollment information.

Schools send all enrollment information directly to FSA. They may use a servicer to complete this task.

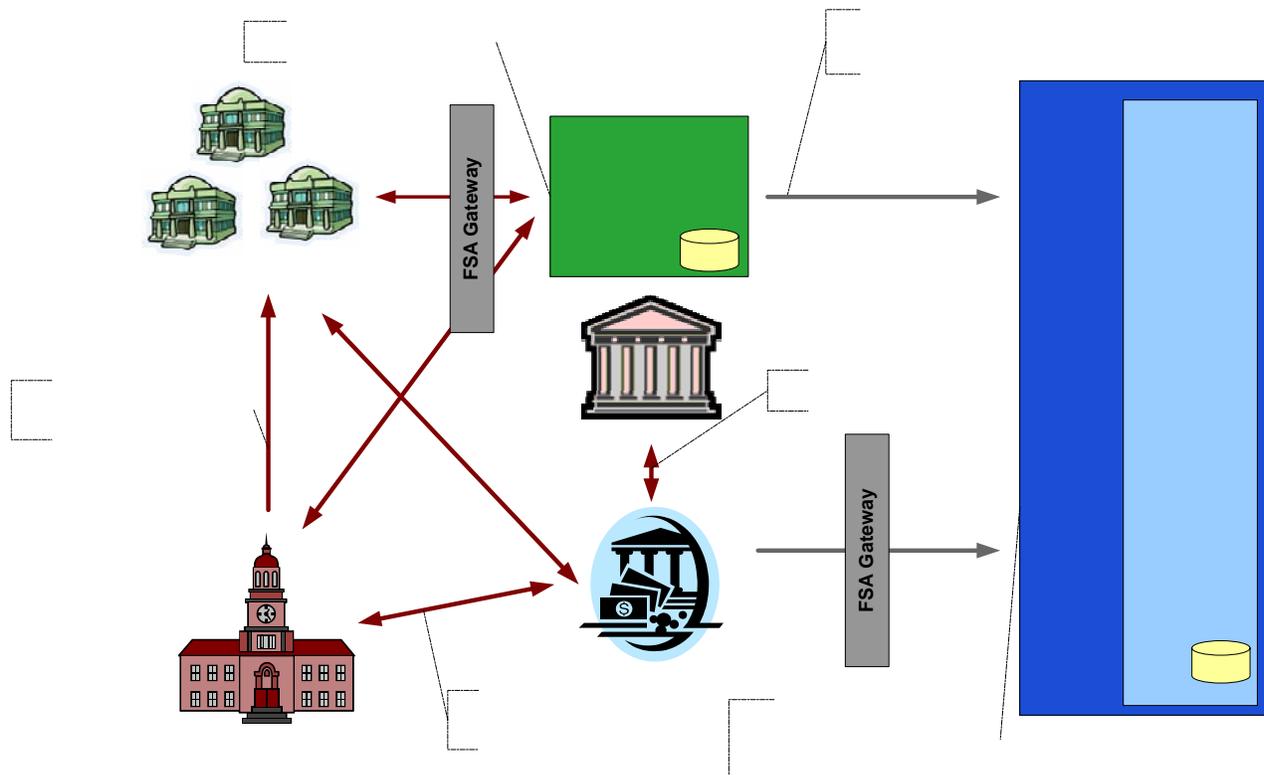
- o Pros



- Provides consolidated, standardized mechanism for both collecting and disbursing enrollment data.
- Enrollment status of transfer students is readily identified.
- Streamlined flow should allow FFEL community to longer have to request enrollment information, meaning potentially reduced costs for the Financial Partners
- Eliminates FSA's cost of sending enrollment confirmation reports to numerous schools
- By not sending list of DL borrowers to contractor (regardless of whether the contractor has information for the borrower), eliminates potential privacy act infringement
- Cons
  - Collecting Non-Title IV enrollment information increases vulnerability to infringing on students' privacy.
  - Small schools may have difficulty switching from Rosters to this model.
  - Potential added costs to schools to use servicers (e.g., if FSA and FFEL community no longer purchase services from Clearinghouse, then Clearinghouse likely will not provide free enrollment reporting to schools).



Updated Option D Diagram: End Recipient



- Target Vision Option D Considerations, Pros, and Cons identified were as following:
  - Considerations
    - FSA discontinues its current role of providing enrollment reporting service for the community.
    - “Handsoff” approach equates to difficulty in providing oversight and/or minimal oversight.
    - CSB still needs to collect enrollment information for Direct Loans
    - GAs act as conduit for FFEL lenders.
    - Both schools and GAs will need timeframe and standardization requirements. These requirements would need to be verified through audits and reviews.
  - Pros
    - Lower cost to FSA
    - An enrollment field already exists on the FFEL reporting file layout
  - Cons
    - Decreased customer service to loan servicers
    - Complete set of enrollment updates are not timely to FSA

CSB gathers enrollment data for Direct Loans

Enrollment Servicer(s)



- Schools have to create a number of interfaces to GAs.
- GAs have to create a number of interfaces for various schools.
- If a student transfers, a GA may need to collect enrollment data from schools they do not service.

## Next Meeting

- Date/Time: 5/12
- Topic: Define Recommended Option
- Presenter(s): Pam Eliadis, David Marker



**8th Meeting:** Enrollment Reporting Data Flow Option Analysis Define Recommendation (Option A or Option C)

**Date:** May 5<sup>th</sup>, 2004

### Objective

Working session to analyze and the final two options (A and C).

### Agenda/ Attendees

The agenda items for this meeting were:

- Define Recommendation
  - Option A - Current State Translated to Target State with Change in Distribution
  - Option C - All Enrollment Directly to FSA

Invitees were as follows. Attendees marked with an X.

Name	Attendance	Business/System Area	E-Mail	Phone (Work)
Allen Prodgers		CSB	allen.prodgers@ed.gov	202.377.3276
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**FFEL and Student Enrollment Data Flow Option Analysis**

Name	Attendance	Business/System Area	E-Mail	Phone (Work)
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## Topic 1: Enrollment Reporting Target State Options

Presenter: David Marker

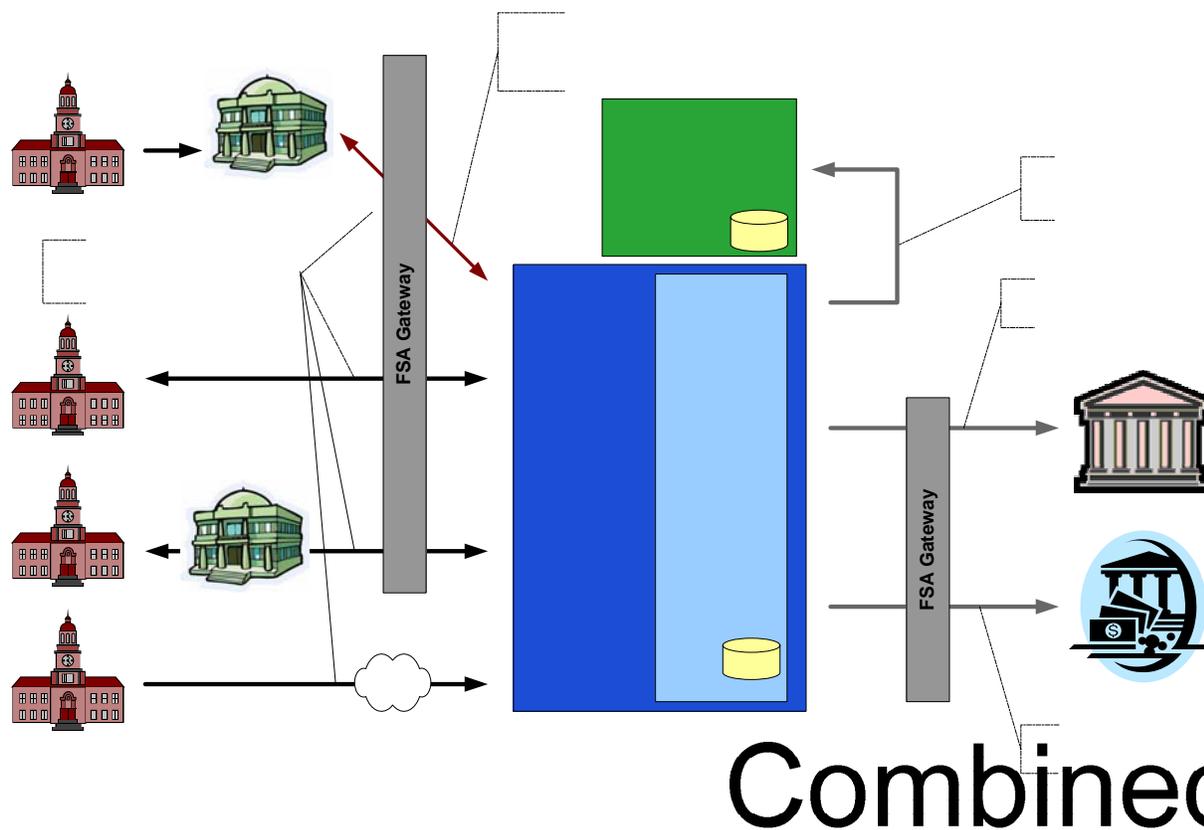
Handouts: Enrollment Reporting Data Flow Option Analysis Define Recommendation (Option A or Option C) slide deck

### Key Decisions:

- The group changed Option A's title to "Contractor/School Rosters with Title IV enrollment and Enrollment Distribution to GAs and Lenders" and Option C to "All Enrollment Data to FSA with Distribution to Lenders/GAs.
- The group updated Options A & C (see diagrams on next pages).
- Lenders may receive supplementary information from borrowers, schools, and GAs in Option A.
- Option C should be based on the assumption that FSA is able to receive all enrollment information (possibly requires regulatory and/or statutory changes).
- Option A will be the chosen option if FSA cannot collect all enrollment information; otherwise, Option C will be the final recommended option.



Updated Option A Diagram: Combined Roster and Contractor Model with Added Lender Distribution



# Combined Ros

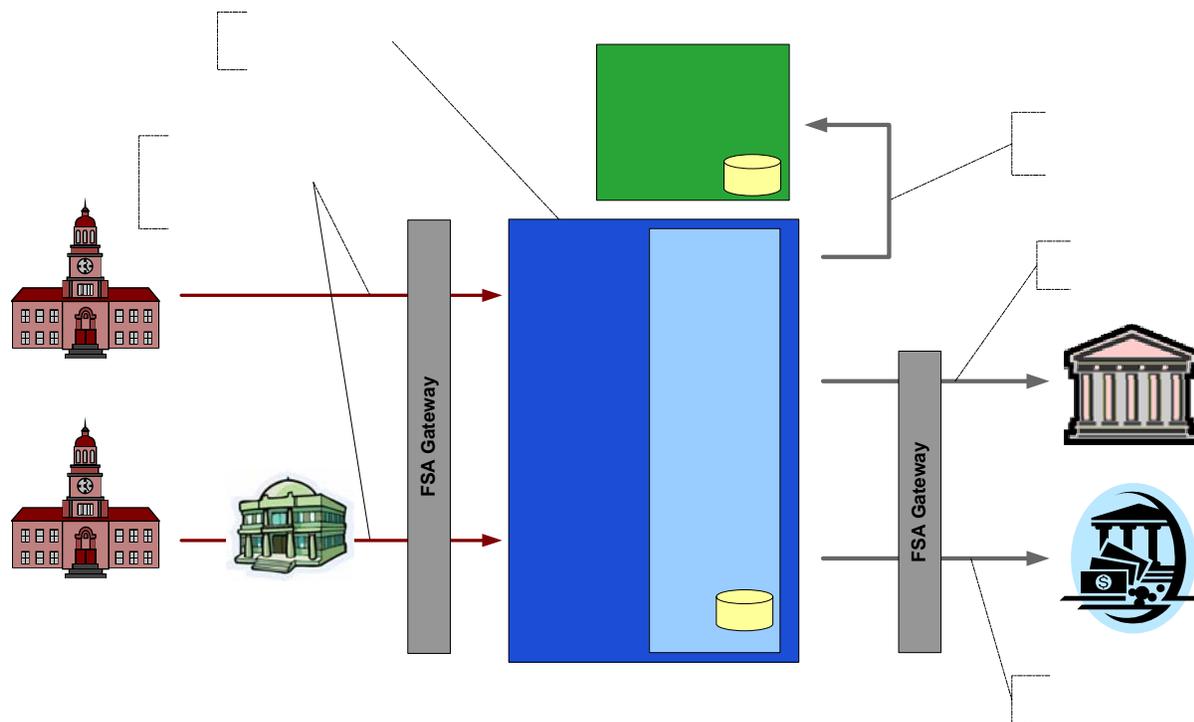
- Target Vision Option A - Considerations, Pros, and Cons identified were as following:
  - Considerations
    - Rather than CSB sending out a list of DL Borrowers, Enrollment Reporting ESF could send out the list.
    - Lenders should be required to receive electronic notification of enrollment updates.
    - Move to require foreign schools to interact directly with FSA. Until this change is made, FSA will continue to receive enrollment data requests from and send updates GAs. This information will continue to flow in as a field on the FFEL detail feed to FSA.
    - The functionality provided by EDEXpress will continue to be available to schools.



- Regulations and/or a Hold Harmless letter will allow lenders to use FSA as the master source of enrollment information.
- SSIM logic will be used to match enrollment updates to existing student information in the CDA.
- In this effort, the FSA Gateway is considered to provide the ideal technical data transfer method. The details of the FSA Gateway will have to be defined in future design projects.
- Consider increasing oversight of reporting (currently if school reports enrollment for at least one student, even if they really have 1,000 students, no warning letter is sent out).
- Consider increasing automation of compliance research to expedite the creation of warning letters.
- No changes in requirements for timing and data have been identified for collecting information from the schools and for distributing the information to the loan servicers and GAs.
- Provide training, create data dictionary and documentation.
- Pros
  - Schools have the flexibility in choosing how to submit information (use a servicer, FSA Gateway, online).
  - GAs and Loan Servicers receive the same updated information from one source (ESF). Lenders no longer have to work with up to 36 GAs to get information.
  - By actively requesting/receiving enrollment updates, borrowers and other customers will be able to see enrollment status as an element in the “Integrated Student View.”
  - Loan servicers do not have to try to collect information from the numerous Title IV schools. They have a consolidated mechanism available for identifying a student’s enrollment status.
  - Direct feed to lenders equals no real development cost to FSA (the functionality has already been developed and tested in a pilot).
- Cons
  - Although the enrollment data is consolidated, the mechanism for collecting the data from multiple sources is not fully standardized (continue to have both DL model and Roster model).
  - Transfer students are not fully covered.
  - Lenders must make changes to their systems in order to receive enrollment data from FSA.
  - Less flexibility: the process has a no-paper option for the lenders to receive enrollment data.



Updated Option C Diagram: Total Enrollment Reporting



- Target Vision Option C Considerations, Pros, and Cons identified were as following:

- Considerations

- Assumption that FSA can collect all enrollment information
    - There are no rosters sent out to schools. The schools report all enrollment information to FSA.
    - The Enrollment Reporting ESF would most likely be contracted out.
    - Student privacy should be protected. Potentially “discard” enrollment information that is not needed.
    - Lenders should be required to receive electronic notification of enrollment updates.
    - Foreign schools are required to submit enrollment data in the same manner as all other schools, either directly to FSA or through an enrollment servicer.
    - Some form of EDEXpress functionality will continue to be available to schools.
    - Regulations and/or a Hold Harmless Letter will allow lenders to use FSA as the master source of enrollment information.

Enrollment Reporting ESF possibly managed by a Contractor  
 Schools send all enrollment information directly to FSA. They may use a servicer to complete this task.



- SSIM logic will be used to match enrollment updates to existing student information in the CDA.
- In this effort, the FSA Gateway is considered to provide the ideal technical data transfer method. The details of the FSA Gateway will have to be defined in future design projects.
- Consider increasing oversight of reporting (currently if school reports enrollment for at least one student, even if they really have 1,000 students, no warning letter is sent out).
- Consider increasing automation of compliance research to expedite the creation of warning letters.
- No changes in requirements for timing and data have been identified for collecting information from the schools and for distributing the information to the loan servicers and GAs.
- Provide training, create data dictionary and documentation.
- Pros
  - Provides consolidated, standardized mechanism for both collecting and disbursing enrollment data.
  - Enrollment status of transfer students is readily identified.
  - Streamlined flow should allow FFEL community to longer have to request enrollment information, meaning potentially reduced costs for the Financial Partners.
  - By not sending list of DL borrowers to contractor (regardless of whether the contractor has information for the borrower), eliminates potential privacy act infringement.
  - Eliminates FSA's cost of sending enrollment confirmation reports to numerous schools.
  - GAs and Loan Servicers receive the same updated information from one source (ESF). Lenders no longer have to work with up to 36 GAs to get information.
  - By collecting all enrollment updates, borrowers and other customers will be able to see enrollment status as an element in the "Integrated Student View."
  - Loan servicers do not have to try to collect information from the numerous Title IV schools. They have a consolidated mechanism available for identifying a student's enrollment status.
  - Direct feed to lenders equals no real development cost to FSA (the functionality has already been developed and tested in a pilot).
- Cons
  - Collecting Non-Title IV enrollment information increases vulnerability to infringing on students' privacy.



- Small schools may have difficulty switching from Rosters to this model.
- Potential added costs to schools to use servicers (e.g., if FSA and FFEL community no longer purchase services from Clearinghouse, then Clearinghouse likely will not provide free enrollment reporting to schools).
- Lenders must make changes to their systems in order to receive enrollment data from FSA.
- Less flexibility: the process has a no-paper option for the lenders to receive enrollment data.
- More costly for schools.



**9th Meeting:** Business Technology Integration Group FFEL Data Flow Options Analysis

**Date:** June 1<sup>st</sup>, 2004

## Objective

Present the final recommendation for the reporting of Student Enrollment 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 Student Enrollment 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 Student Enrollment Reporting.
- Business Objectives for Student Enrollment 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 Student Enrollment 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: Student Enrollment Reporting Data Flow Final Analysis Handout

Key points/Decisions Made:

How will Student Enrollment Reporting be used in the Target State.

- Facilitate loan servicers (e.g., DLSS, lenders, etc.) to determine if and when a student should enter repayment or remain in repayment by providing a consolidated, standardized mechanism for identifying a student's enrollment status.
- Provide customers with enrollment status as one of the elements in the "Integrated Student View."
- Allow FSA enterprise analytics to be based off of accurate student enrollment information.
- Ensure accuracy of default prevention tool reports provided to Partners (indirectly affects CDRs).



- Possibly provide complete Title IV enrollment data by collecting for Campus Based/PELL borrower's enrollment status.
- Collect all enrollment data, allowing for more robust analytics (e.g., time spent in school, graduation rates, withdrawal rates, etc.) and an efficient/streamlined enrollment reporting process.
- Provide full FSA Gateway access for enrollment reporting (e.g., schools that lose eligibility but do not close).

The considerations for the final recommendation of Student Enrollment in the Target State are as follows:

- Key assumption: FSA will be able to collect total enrollment information from all schools.
- There will be no rosters sent out to schools. The schools will report total enrollment information to FSA on a scheduled basis.
- All partners will be required to communicate electronically with FSA.
- The FSA Gateway will provide the ideal technical data transfer method. The details of the FSA Gateway will be defined in future design projects. Some form of EDEExpress functionality will continue to be available to schools.
- Student privacy will need to be protected. May need to discard enrollment information that is not needed.
- Regulations and/or a Hold Harmless Letter will allow lenders to use FSA as the master source of enrollment information. The lender will continue to accept ad hoc exceptions where external enrollment updates indicate a student is no longer enrolled (e.g., student directly calls lender and indicates he/she is no longer attending).
- SSIM logic will be used to match enrollment updates to existing student information in the CDA.
- Oversight will be increased. Compliance research will be more automated and will expedite the creation of warning letters. FSA will look at the data reported by schools, not just whether the schools reported (currently if a school reports enrollment for at least one student, even if they really have hundreds or thousands of students, no warning letter is sent out).
- The financial partner community desires training, a data dictionary, detailed process documentation, and a single source for obtaining student enrollment data.
- Receive student enrollment data from all schools participating in financial aid programs, not all school.
- The use of RID as an additional identifier should be reviewed to assist with the match of enrollment information to the loan records in the CDA.

The Pros for the final recommendation of Student Enrollment in the Target State are as follows:



- Provides consolidated, standardized mechanism for both collecting and disbursing enrollment data.
- Enrollment status of transfer students is readily identified.
- Streamlined flow should allow FFEL community to receive enrollment information without a request, potentially reducing costs for the Financial Partners.
- By not sending a list of DL borrowers to a contractor (regardless of whether the contractor has information for the borrower), potential privacy act infringement is eliminated.
- Eliminates FSA's cost of sending enrollment confirmation reports to numerous schools.
- GAs and Loan Servicers receive the same updated information from one source (Enrollment Reporting ESF). Lenders no longer have to work with up to 36 GAs to get information. Partners agree that they want one single source to receive enrollment data.
- By collecting all enrollment updates, borrowers and other customers will be able to see enrollment status as an element in the "Integrated Student View."
- This data could help in determine trend analysis, what the effect is of students getting rejected for financial aid, and to help perform reasonability check on lender payments.

The cons for the final recommendation of Student Enrollment in the Target State are as follows:

- Collecting Non-Title IV enrollment information increases vulnerability of infringing on students' privacy.
- Small schools may have difficulty switching from rosters to this model.
- Requiring all partners to use electronic communications with FSA will add a cost to the trading partners that currently do not have these capabilities.
- Lenders will have an initial cost to change their systems to receive enrollment data directly from FSA.