

NSLDS II Reengineering
Appendix A: Business Functions Matrix - DRAFT

Appendix A: Business Function Matrix

The Business Function Matrix contains a list of high-level functional requirements that should be addressed by NSLDS II.

The layout of the matrix is as follows:

Business Function Matrix Heading	Description
Business Driver	Categorizes the functional requirements. The following NSLDS reengineering business driver categories were identified: Data Integrity, Financial Integrity, Customer Satisfaction, and Operational Cost.
Requirement Number	Functional requirement number.
Functional Requirement	Describes the functional requirement.
Requirement Status	Identifies whether the requirement is a new or existing requirement. A new requirement is functionality or a process that is currently not supported (e.g., Ability for schools to submit Title IV student enrollment information to a single enrollment repository). An existing requirement is functionality or a process that is currently supported but may not be performing to the satisfaction of the end user(s).
NSLDS II Functional Requirement Areas	Documents the core NSLDS functions that are impacted by the functional requirement. Each requirement contains an "X" in bold, indicating to which requirement area is the requirement most aligned.
NSLDS II Reengineering Solutions	Identifies which proposed NSLDS II Reengineering Solution(s) may satisfy the functional requirement.
Priority	Prioritizes the functional requirements. The following priority categories were identified: <ul style="list-style-type: none"> - High Priority: Critical requirements that must be supported by NSLDS II as soon as possible. - Medium Priority: Very important requirements that should be supported by NSLDS II in the near term. - Low Priority: Important requirements that but do not have to be supported by NSLDS II in the immediate future.
Source	Identifies the name of the resource providing the requirement. The sources include focus groups, as well as NSLDS manuals and documents.
Comments	Provides examples and/or additional clarification regarding the functional requirement.

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1.0 Data Integrity																						
	1.1	Data Accuracy																				
	1.1.1	Ability for NSLDS to receive and store accurate data from schools, lenders, servicers, GAs, and FSA systems.		X	X	X	X	X	X	X	X	X	X				X				Program Analysis; CIO; Financial Partners; CFO; Schools; Students; Ombudsman	- Loan data received from the GAs have missing key identifiers (i.e., SSN, DOB, last name). - The following entities send data to NSLDS: - Schools: Perkins loan details; student overpayments, enrollment changes - Lenders/Servicers: FFEL loan details; student enrollment changes - GAs: FFEL loan details, including guarantee information; defaulted non-subrogated loan information - FSA systems: Pell loan data; direct loan data; lender/GA demographics; default loan updates
	1.1.2	Ability for schools, servicers, lenders, GAs, and FSA systems to submit loan updates in a timely manner.		X	X	X	X	X	X	X	X	X	X								Program Analysis; CIO; Financial Partners; CFO; Schools; Students; Ombudsman	- Some schools/servicers are not reporting all of their Perkins loan information. - Some small lenders do not provide loan data to FSA through their GA. - Some loan updates never reach NSLDS because of load edits in the data feed process. - Lenders and servicers submit their loan details to GAs on a quarterly basis. GAs submit loan details to NSLDS on a monthly basis.
	1.1.3	Ability for GAs to provide accurate collection information on defaulted loans.		X				X			X		X							CFO	- If the information on defaulted loans held and serviced by the GA were reported more accurately, CFO could perform better reasonability checks, enhanced reporting, and more accurate budget analysis.	
	1.1.4	Ability for NSLDS to provide accurate data to requesting systems.		X	X	X	X	X	X	X						X					Program Analysis; CIO; Financial Partners; CFO; Schools; Students; Ombudsman	- NSLDS feeds inaccurate data to other systems, such as, FP data mart and CPS.
	1.1.5	Ability for Title IV data to be consistent among lenders/servicers, GAs, schools and NSLDS.		X	X	X	X	X	X	X	X	X	X	X	X						Program Analysis; CIO; Financial Partners; CFO; Schools; Students; Ombudsman	- Consistent data between lenders, servicers, GAs and NSLDS would improve audits and program reviews. - Schools are requested to keep their own files/databases and NSLDS accurate regarding campus based aid data, but are only audited on their own records. They often do not update data in NSLDS. - Some underlying loans of a consolidation are not properly closed in the NSLDS, GA, and Lender/Servicer systems. For example, a "closed" status is reflected in one system but not others, making reconciliation of loan data difficult and time-consuming.
	1.1.6	Ability to identify redundant data records within NSLDS.	X		X		X				X	X	X			X	X			Program Analysis	- Redundant records are often created in NSLDS during the loan consolidation or transfer process.	

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	1.1.7	Ability for direct edits made in NSLDS to remain accurate after future data feeds.	X		X	X	X	X	X	X	X	X	X	X			X	X		CIO; Financial Partners; CFO; Ombudsman	- Data corrections made directly in NSLDS, and not in the source system, are often overwritten by future data feeds from the source system.	
	1.1.8	Ability to track and access demographic information about loan records in NSLDS.	X		X	X	X			X	X	X					X	X		Program Analysis; Ombudsman	- An audit trail tracking changes to loan data would help gauge the accuracy of the data (e.g., date of last update, source of last update). - NSLDS should post the date when the loan record was last updated on the user interface.	
	1.2 Loan Information																					
	1.2.1	Ability to distinguish each type of Title IV aid within NSLDS.		X	X		X				X	X	X			X		X		Ombudsman	- HEAL loans do not have a unique identifier in NSLDS. They appear as large FFEL unsubsidized loans.	
	1.2.2	Ability to associate underlying loans and their detailed information to the overall consolidated loan.		X	X	X	X	X	X		X	X	X	X					CIO; Financial Partners; CFO; Schools; Students; Ombudsman	- Because no tie exists between the underlying loans and the consolidated loan, there is no way to determine the loan status of the underlying loans to verify they were properly closed.		
	1.2.3	Ability to capture the accurate status for a loan.		X	X	X	X	X	X		X	X	X	X			X		CIO; Financial Partners; Schools; Ombudsman	- Loan status is particularly a problem with consolidated loans. In some cases, the underlying loans of a consolidated loan do not have a "closed" status.		
	1.2.4	Ability for a class of users to have full access to the financial aid data.		X	X	X	X	X	X		X	X	X						Schools	- When a school closes, the school's servicer often does not transfer the loan to ED as it should or continue to service it. Because ED does not have ownership of the loan and the servicer is no longer assuming ownership of the loan, no changes can be made to it.		
	1.2.5	Ability for each loan to have a single unique key identifier.	X		X	X	X	X	X			X	X			X	X		Ombudsman; OMB; Schools	- In the current environment, end users have to search on three key fields (i.e., SSN, last name, DOB) to locate a loan. - Loan identifiers are often missing in the data submissions by servicers.		
	1.3 Borrower Aid History																					
	1.3.1	Ability to determine the borrower's Title IV aid history.		X	X	X	X						X		X				SFA Handbook: Student Eligibility; Common Manual: Unified Student Loan Policy; NSLDS Federal GA Data Provider Instructions	- Title IV aid history includes: open and closed loans and grants, original and remaining balances, disbursement dates, enrollment information, etc. - The dependency status of the borrower should be tracked as it impacts the amount of eligible aid for an applicant. - NSLDS should create a loan history record, similar to a college transcript, where all loans are listed for a student and the changes to the student's loan record tracked.		
	1.3.2	Ability to determine if an aid applicant/borrowers is in default on an existing Title IV loan.		X	X	X			X				X		X				SFA Handbook: Student Eligibility; Common Manual: Unified Student Loan Policy; Students; Ombudsman	- This criteria is validated during pre-screening of an aid applicant.		

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	1.3.3	Ability to determine if an aid applicant/borrower owes overpayments on Title IV aid.		X	X	X										X		X				SFA Handbook: Student Eligibility; Common Manual: Unified Student Loan Policy; Students; Ombudsman	- This criteria is validated during pre-screening of an aid applicant.
	1.3.4	Ability to determine if an aid applicant has borrowed the maximum amount allowed based on annual loan limits received.		X	X	X										X		X				SFA Handbook: Student Eligibility; Common Manual: Unified Student Loan Policy; Students; Ombudsman	- This criteria is validated during pre-screening of an aid applicant.
	1.3.5	Ability to determine if an aid applicant has borrowed the maximum amount allowed based on aggregated loan limits received in prior award years (based on unpaid principal balances) .		X	X	X										X		X				SFA Handbook: Student Eligibility; Common Manual: Unified Student Loan Policy; Students; Ombudsman	- This criteria is validated during pre-screening of an aid applicant.
	1.3.6	Ability to determine if an aid applicant is in default on an existing Title IV loan after pre-screening has been conducted.		X	X	X										X		X				SFA Handbook: Student Eligibility; Students; Ombudsman	- This criteria is validated during post-screening of an aid applicant.
	1.3.7	Ability to determine if an aid applicant owes overpayments on an existing Title IV loan after pre-screening has been conducted.		X	X	X										X		X				SFA Handbook: Student Eligibility; Students; Ombudsman	- This criteria is validated during post-screening of an aid applicant.
	1.3.8	Ability to monitor transfers of student borrowers.		X			X										X					SFA Handbook: Student Eligibility; CFO	- NSLDS needs to be able to monitor student borrower transfers at any point in an award year (i.e., beginning of semester, mid-semester, end of semester).
	1.3.9	Ability to notify appropriate systems and people if an aid applicant/borrower's financial aid history has had a substantive change affecting eligibility.		X	X	X						X					X					SFA Handbook: Student Eligibility; CFO	
	1.4 Enrollment																						
	1.4.1	Ability to collect and display enrollment statuses for a borrower enrolled in multiple schools for the same time period.	X			X							X					X	X			Ombudsman	- As distance learning occurs more often, more students are enrolled simultaneously in multiple schools.
	1.4.2	Ability to track a borrower's enrollment status.		X		X							X				X					Common Manual: Unified Student Loan Policy; Schools; Ombudsman; Students	- When the school does not report that a student is enrolled after the expected graduation date, the status of withdrew is automatically applied to this student by the Clearinghouse. The Clearinghouse does not verify this enrollment status with the school, leading to inaccurate enrollment status stored in NSLDS.
	1.5 Loan Transfer																						
	1.5.1	Ability to accurately track the current holder of a loan.		X		X		X	X						X							Financial Partners	- Reconciliation of loans is very difficult when the loan holder cannot be located.
	1.5.2	Ability to track the history of loan holders.		X														X				NSLDS Federal GA Data Provider Instructions	- Transferred loans may result in the appearance of duplicate records within NSLDS during the transitory period between the seller and buyer submitting their loan details.
2.0 Financial Integrity																							
	2.1 Payments to GAs and Lenders/Serviceirs																						
	2.1.1	Ability to receive loan summary information by cohort year, risk category, and loan type.	X							X		X	X	X					X			CFO	- In order to properly report under the Credit Reform Act, it is necessary to collect cohort year, loan type and risk category for all FFEL loans. This information is used to prepare various required reports as well as provide Budget Service necessary information to compute subsidy estimates

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	2.1.2	Ability to receive and store data to reconcile/calculate detailed loan data submitted by GAs with the Form 799 loan summary submission by lenders/servicers.		X					X					X									Ombudsman; CFO	- Lenders and servicers receive interest subsidy and special allowance payments based on their submitted 799 summary form.
	2.1.3	Ability to receive and store loan data to reconcile/calculate issuance and maintenance fee payments to the GAs (i.e., LPIF and AMF).		X					X					X			X						NSLDS Federal GA Data Provider Instructions	
	2.1.4	Ability to receive and store loan data to reconcile/calculate reinsurance payments to the GAs.		X					X					X			X						NSLDS Federal GA Data Provider Instructions	
	2.1.5	Ability to reconcile default payments to GAs with loan level details before reinsurance payment.	X						X					X					X				CFO	- The CFO group would like to perform reasonability analysis before loan default payments are disbursed. Currently, FSA pays the GA's "on demand" (i.e., as soon as the claim is received - Form 2000). It can take up to six months to receive all of the loan data to perform a proper reasonability analysis.
	2.2 Loan Servicing																							
	2.2.1	Ability to notify GAs and the direct loan servicing system of student enrollment changes.		X						X	X				X								Common Manual: Unified Student Loan Policy	- Student enrollment changes directly impact when a student must begin repaying their loan.
	2.2.2	Ability for loan holders to provide timely updates when a loan transfers from one loan holder to another.		X				X	X	X		X		X									Financial Partners	
	2.2.3	Ability to track delinquent loans that are not yet in default.	X						X	X		X					X	X					CFO; Schools	- Tracking delinquent loans would insert some control measures in the default collections process.
	2.2.4	Ability to provide schools a preview of data that will be used to calculate a school's draft or official cohort default rate.		X						X				X	X	X							Common Manual: Unified Student Loan Policy; Cohort Default Rate Guide	- The data preview sent to schools is known as the Repayment Information Report or the notional CDR.
	2.2.5	Ability to calculate draft and official cohort default rates for schools.		X						X				X	X	X							Common Manual: Unified Student Loan Policy	- Loan details are submitted by lenders/servicers quarterly to the GAs. The GAs submit these details to NSLDS monthly. Edits may occur between each of these data exchanges resulting in loan information being delayed into NSLDS. This delay may result in CDR errors.
	2.2.6	Ability to provide schools or loan holders the loan details to substantiate a calculated draft or official cohort default rate.		X						X													Common Manual: Unified Student Loan Policy	
	2.2.7	Ability to calculate cohort default rates for loan holders.																						
	2.2.8	Ability to calculate a cohort default rate using a comprehensive dataset from the cohort fiscal year.		X						X				X									Schools	- Until the loan details are stored in NSLDS, they will not be included when calculating a CDR. - Loan details are submitted by lenders/servicers quarterly to the GAs. The GAs submit these details to NSLDS monthly. Edits may occur between each of these data exchanges resulting in loan information being delayed before posting to NSLDS. This delay may result in CDR errors.
	2.3 Program Review, Analysis, and Forecasting																							

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	2.3.1	Ability to perform hypothetical analysis for reporting purposes.	X		X		X				X	X					X			X	Students	- Currently there is no way to identify a relationship between aid applicants who misreport on their FAFSA and who also default on their loan.
	2.3.2	Ability to provide loan details for all loans and/or a subset of loans held by a specific organization (i.e., schools, servicers, lenders) for audit and program review purposes.		X								X					X				NSLDS Federal Perkins Data Provider Instructions; NSLDS Federal GA Data Provider Instructions; Schools	- If an audit or program review is being conducted on a large lender/servicer/GA, then only a sample of the data from NSLDS is used during the audit or program review.
	2.3.3	Ability to provide guaranty agencies, lenders, servicers and schools with reports for researching and assessing their own performance in administering student aid programs.		X								X					X				NSLDS Federal Perkins Data Provider Instructions; NSLDS Federal GA Data Provider Instructions	
3.0 Customer Satisfaction																						
3.1 Data Exchange																						
	3.1.1	Ability to maintain or reduce the number of data exchanges in the loan details submission process that involves the lenders/servicers, GAs, and NSLDS.	X			X		X	X		X	X	X						X		Financial Partners; Schools; CFO; CIO	- Adding another layer of data exchange would add another layer of reconciliation and another entity for review and possibly create additional errors.
	3.1.2	Ability for data to be retrieved from source systems without degradation in performance standards.	X			X	X				X	X	X			X	X		X		Students	
	3.1.3	Ability for schools to update enrollment history and identify loan/grant overpayments for its student borrowers online.		X							X										SFA Handbook; Student Eligibility; CIO; Schools	- Schools are required to submit student enrollment information twice a year or if the enrollment status of a student changes. Most submit their enrollment updates between 5-6 times a year. - Schools enrolling a small number of students who receive Title IV aid tend to submit their enrollment updates online.
	3.1.4	Ability to provide relevant data to schools throughout the student lifecycle.	X		X												X	X	X		Schools	- Schools receive more data than is necessary because the student lifecycle has not been analyzed when designing systems to determine specific information needs and exactly at which point in the process this information is needed.
	3.1.5	Ability for borrower to view their Title IV student aid history using the Internet.		X		X	X	X													NSLDS Federal Perkins Data Provider Instructions	
	3.1.6	Ability to have access to the GA loan detail reporting schedule online.		X	X	X		X	X		X	X	X								Ombudsman; Financial Partners	- The GA reporting schedule assists in determining when the last update was made to a loan record and when the next update will occur. Knowing this schedule will help the Ombudsman respond to questions about a borrower's financial aid history. It will also help program reviewers and auditors to determine when the audit or program reports should be generated.
3.2 Data Edits																						
	3.2.1	Ability to apply unscheduled data manipulations without a lengthy quality assurance process.		X		X															Ombudsman	- When unscheduled data manipulations are needed, a SPUI request must be filed with the NSLDS contractor. Due to a lengthy QA process, a response to the request can take as long as a couple of months.
3.3 Data Analysis																						

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	3.3.1	Ability to search and locate a loan using a single unique key identifier.	X		X	X		X	X	X			X	X	X			X	X		Ombudsman; Schools	- When searching the loan records using the current three identifiers (i.e., SSN, DOB, and last name), only a few records are returned and often the sought loan is not returned in the query results. - A single unique loan ID number is needed. This number would assist in reconciling loan data between lenders/servicers, GAs, and NSLDS. NSLDS could either capture and store this identifier or be told where to look for it in the source system.	
	3.3.2	Ability to search and locate a loan when key data fields are missing.	X		X	X		X	X			X	X	X			X	X		Ombudsman	- Lenders and servicers submit data to NSLDS with missing key identifiers (i.e., SSN, DOB, last name).		
	3.3.3	Ability to have access to specific loan detail data elements.		X																Financial Partners	- Only certain fields on a loan are reviewed during an audit or program review (e.g., loan holder, loan status, amount guaranteed, and outstanding principal balance).		
	3.3.4	Ability to approve student eligibility real time.	X		X													X		Student	- Once an aid applicant's identity has been verified, the student could know its eligibility immediately after submitting a corrected FAFSA if CPS and NSLDS were designed to provide and receive real time data, instead of batched data.		
	3.3.5	Ability to receive query results in a timely manner.		X								X	X	X			X			Financial Partners; Program Analysis	- Execution time of most queries is 1-2 hours but can last as long as overnight. - Queries results are received in batch format. - Query results are not promptly received for multi-joined queries.		
	3.3.6	Ability to receive data from NSLDS without limiting the size of a query result.	X									X	X	X			X		X	Financial Partners	- Some query results are incomplete due to data download limits in NSLDS.		
	3.3.7	Ability to generate reports in a timely manner.		X								X	X	X			X			Financial Partners; Program Analysis	- Some program review reports are generated up to a month before the review is conducted. - Results received from executing queries are not logically categorized. A lot of time is spent formatting and editing the data into a useful report format.		
4.0 Operational Cost																							
4.1 Efficiency																							
	4.1.1	Ability to make case-by-case edits to data marked as historical (i.e., before a determined date).	X			X													X	Ombudsman	- The majority of NSLDS's data integrity issues are found in the data that is 10-15 years old. - As much as half of the data in NSLDS originates before 10/1/89. - Data inaccuracy in NSLDS requires a significant learning curve, extensive data knowledge, and time-consuming validation and verification (V&V). - There are gaps in the historical data within NSLDS.		
	4.1.2	Ability to reduce application maintenance and help desk support costs.	X									X	X	X			X	X			- Application maintenance consists of hardware and software costs. - Help desk support includes responding to system inquiries and troubleshooting requests.		

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	4.1.3	Ability to provide a user-friendly query tool that allows an end user to perform ad hoc queries.		X																			Financial Partners; Program Analysis	- The process of having an NSLDS contractor to generate and execute complex ad hoc queries is time-consuming. - Access to data requires the extensive knowledge of NSLDS data organizational codes and exceptions, ability to write advanced SQL code, and the ability to use query batch tool.
	4.1.4	Ability to access data from multiple systems through a single query tool.		X																			Program Analysis	- When performing analysis of the Title IV program, data must often be retrieved from multiple systems.
	4.2 Decision Making																							
	4.2.1	Ability to compare data for accurate "snapshot in time" data analysis.		X																			Program Analysis; CFO	- Varying data feed frequency into NSLDS results in inconsistent data comparisons.
	4.2.2	Ability to store all Title IV participant enrollment information in a single repository.		X																			Program Analysis; CIO; Financial Partners; CFO; Students; Ombudsman	- At least 80% of all Title IV student enrollment information is collected by the NSC.
	4.2.3	Ability to provide data that can be used to develop reliable, sound forecasts and program estimates.		X																			NSLDS Federal GA Data Provider Instructions	- Data that is old could jeopardize the quality of reports, analysis, and policies.