

Use National Student Clearinghouse free service to help you comply with Gainful Employment reporting

If your institution offers programs that qualify under Gainful Employment regulations, you've probably been busy preparing the reports on recently enrolled students that are due to the Department of Education. Even with the ED's recent extension of the deadline from Oct. 1 to Nov. 15, preparing and submitting the reports can be a challenge.

At Oakton Community College in Illinois, officials plan to prepare and report the data using a free system provided by the National Student Clearinghouse, said Bruce Oates, director of athletics and registrar services. That system could make the task simpler and more productive for your institution.

The service is available to institutions that use the Clearinghouse's Core service — and since about 3,300 institutions use that service, there's a good chance that you are eligible.

If you're not sure whether the Gainful Employment reporting requirement applies to your institution, check with your legal counsel (*and see box on p. 9 for more information about what programs the regulations apply to*).

Officials at many institutions did not focus on the reporting until late in the process, said Roberta Hyland, assistant vice president of government relations at the Clearinghouse. And officials at some institutions do not seem to be aware of the regulations, she added.

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Review resources that assist with Gainful Employment reporting

If you'd like to know more about Gainful Employment regulations and what you need to do to comply with them, the Department of Education has provided a variety of resources that could answer your questions.

The ED offers information and links on the regulations and procedures at <http://lifap.ed.gov/GainfulEmploymentInfo/index.html>. The website includes links to the regulations, "Dear Colleague Letters" on the topic, frequently asked questions, a listing of training opportunities, and a resources page.

The training page contains links to videos and transcripts of ED Webinars regarding Gainful Employment.

The resources include an online *National Student Loan Data System Gainful Employment User Guide* that provides detailed instructions for preparing and submitting the data. ■

Work with financial aid

The Gainful Employment reporting is complicated because the required data comes from two different systems at most institutions. Information from the student information system and from financial aid records are required, Hyland said. "This is definitely something that would be a partnership with the financial aid office and the registrar's office," she added.

Officials who understand how the different systems are used need to be involved in the process, she said. Each system at every institution is customized to some degree, so some data elements may not be what they seem to be to someone who doesn't work with the data on a regular basis, Hyland said.

You'll also need to work with information technology to determine what data elements to pull, said George Levathes, vice president of operations and finance at the Clearinghouse. The major SIS vendors are creating software to extract the data and have scheduled releases for dates during the first half of September, he said.

Gain confidence in your data

Institutions can choose one of two ways to present their data to the National Student Loan Data System. Those who use the Clearinghouse system submit the data they have prepared in one of those formats to

the Clearinghouse. The Clearinghouse provides the institution with a report showing the characteristics the data reveals. For example, the report might show that the institution has 125 students enrolled in its nursing program. When officials review the report, they can determine whether the data they submitted shows the characteristics they expected it to show. If it doesn't, they can evaluate what went wrong when they pulled the data and correct the problem before the data is submitted to the NSLDS, Levathes said.

The Clearinghouse also provides warnings if data does not appear to be correct. For example, if a birthday doesn't look right, the institution can correct the mistake. Correcting certain errors will be critical, and the Clearinghouse will let institutions know if an error is serious enough to require a correction, Levathes said.

In the future, the Clearinghouse plans to develop an interface so that institutions can make corrections to the data files rather than resubmitting data, he added.

Once institution officials confirm that the data is accurate, the Clearinghouse submits it to the NSLDS.

Besides helping institutions meet their reporting obligation, using the system can provide institutions with useful information about their students. For example, the Clearinghouse produces reports detailing what happened to students after they left the institution, Levathes said.

Ensure FERPA compliance

As with the Clearinghouse's other services, Gainful Employment reporting includes an agreement

making the Clearinghouse an agent of the institution. The organization has extensive experience with FERPA compliance.

Learn more about the National Student Clearinghouse's Gainful Employment Reporting Service at www.studentclearinghouse.org/colleges/coreserv/gainfulemployment.htm. ■

Understand whether Gainful Employment regs apply

Gainful Employment rules apply to more than 55,000 educational programs in nonprofit and for-profit institutions. Virtually all programs at for-profit institutions must comply with the new regulations.

The only exceptions are preparatory programs for future enrollment and educational programs offered since January 2009 that lead to a bachelor's degree in liberal arts at for-profit institutions that have had regional accreditation since October 2007.

Title IV eligibility for nondegree programs at nonprofits and public educational institutions is also governed by these regulations.

These include undergraduate and postbaccalaureate certificate programs, and graduate and postgraduate certificate programs. Teacher certification programs and "comprehensive transition programs" for students with intellectual disabilities are also included. ■

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