Introduction to Compliance Reporting

National Student Clearinghouse Audit Resource Center
AGENDA

• Who are the Compliance Reporting Players?

• NSLDS Compliance Reporting Requirements
  – & How NSC Processes Support Your School

• Resources

• Questions
Who are the Compliance Reporting Players?
Who are the Participants in this Process?

U. S. Department of Education
Federal agency overseeing K-20 education

Federal Student Aid
Administrators of federal grants, loans and work-study funds

Common Origination & Disbursement (COD) system

National Student Loan Data System
Central database for student aid

Educational Institutions

National Student Clearinghouse

Lenders & servicers of federal loan programs
Who are the Participants in this Process?

- **Colleges & Universities**: 3,700+ postsecondary institutions, represents 98% of U.S. enrollment.

- **NSLDS**
- **Guarantors**
- **Servicers**

The National Student Clearinghouse connects these participants, facilitating the management and clearance of student information.
Who We Work With

• Registrars
• Financial Aid Directors
• Institutional Researchers
• School Compliance Officers
• Student Information System Advisors
• Auditors (ARC)
NSLDS Compliance Reporting Requirements

&

Clearinghouse Processes that Support Schools
<table>
<thead>
<tr>
<th>#1</th>
<th>#2</th>
<th>#3</th>
<th>#4</th>
<th>#5</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSCRs completed at least every 2 months</td>
<td>SSCRs returned within 15 days of receipt</td>
<td>Correct SSCR errors within 10 days of receipt</td>
<td>Report drops below Half Time within 60 days from date of determination</td>
<td>NSLDS Enrollment Reporting Statistics score must be &gt;= 90%</td>
</tr>
</tbody>
</table>
ED Reporting Requirements

#1 SSCRs completed at least every 2 months

#2 SSCRs returned within 15 days of receipt

#3 Correct SSCR errors within 10 days of receipt

#4 Report drops below HT within 60 days from date of determination

#5 NSLDS Enrollment Reporting Statistics score must be >= 90%
Clearinghouse Processes: Submission Schedule to Support Compliant Reporting

• NSC has an NSLDS SSCR Roster scheduled monthly for schools to meet ED requirements regarding frequency of reporting

• NSC advises schools send enrollment files every 30-45 days

• Automated reminder emails

• Future Enhancements

• Clearinghouse Academy Tutorial: “Changing Your Reporting Schedule”
Clearinghouse Processes: Enrollment Reporting Compliance Schedule

School Sends File to NSC on Day 1, NSC Sends Errors and Warnings to School on Day 1.5, School resolves Errors & Warnings on Day 2.5, NSC does final review and loads file to database on Day 3.

Around the 1st through 3rd of the Month NSC receives SSCR roster from NSLDS and starts responding with most recently certified enrollment data loaded for school.

Four days later, NSC runs Supplemental SSCR Adds Process to request NSLDS add students missing from the current roster to future rosters.

If school submission received and processed between 1st and 11th of month, NSC may run a mid-month roster to capture the newer data.

NSC receives NSLDS SSCR Error Report and presents these errors on the secure NSC site with an email alert to the school that action is required to address the errors.
ED Reporting Requirements

#1
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SSCRs returned within 15 days of receipt

#3
Correct SSCR errors within 10 days of receipt

#4
Report drops below HT within 60 days from date of determination

#5
NSLDS Enrollment Reporting Statistics score must be >= 90%
#2 Clearinghouse Processes: Roster Response Completed

## Clearinghouse Processes: Roster Response Completed

<table>
<thead>
<tr>
<th>SSCR Creation Date</th>
<th>NSC Received Date</th>
<th>NSC Processed Date</th>
<th>Originator</th>
<th>Error Report Received Date</th>
<th>NSC Due Date (by 5 PM ET)</th>
<th>Error Response Sent Date</th>
<th># of Students w/ Errors</th>
<th>NSLDS Error Codes and (#)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/9/2018</td>
<td>7/9/2018</td>
<td>7/9/2018</td>
<td>CH</td>
<td>7/12/2018</td>
<td>7/16/2018</td>
<td>0</td>
<td>6</td>
<td>75(5) 77(1)</td>
</tr>
</tbody>
</table>
ED Reporting Requirements

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Clearinghouse Processes:
Clearinghouse Error/Warning Logic In Place To Avoid Unnecessary NSLDS SSCR Roster Errors

1. School Sends Data
   - Via secure FTP

2. Clearinghouse Database
   - Once the file arrives, the Clearinghouse performs compliance validations on the data.

3. Clearinghouse back to School
   - School completes required compliance validations to data, correcting any information that was identified as erroneous.

4. School back to Clearinghouse
   - Corrections are reviewed and, if corrections are complete, data is loaded to Clearinghouse database.
Clearinghouse Processes: Support For Your School to Correct NSLDS SSCR Roster Errors Timely

- NSC includes a “by when” date for each series of NSLDS SSCR Roster errors presented.
- NSC’s SSCR Roster Error Correction platform provides you with resources and support to address errors presented.
- Login at www.studentclearinghouse.org/ See the Student Reporting Tab + Enrollment Reporting Link + NSLDS Reporting Tab

An error free SSCR response is possible
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ED Explanation for Assessing Timeliness Appropriately via Date of Determination

- Section 4.4.2 of the NSLDS Enrollment Reporting Guide

- “the Effective Date is neither the ‘date of determination’ nor the date that the school becomes aware of a status change; rather, it is the date that the enrollment status first became effective.”

- “It is not required that the update be received by NSLDS within two months of the Enrollment Status Effective Date; rather, the school must report the retroactive status change in its next scheduled enrollment submission, or sooner if possible, although this might happen months after the actual effective date.”

- “Even though a school may not be able to report a status change until more than 60 days after the actual Effective Date of that status change, this retroactive reporting does not violate the requirement to report every 60 days.”

- Clearinghouse Academy Webinar: “Date of Determination Solved!”
Clearinghouse Processes: Supplemental SSCR Adds File to Support Compliance Reporting with NSLDS

Identifies Students NOT on SSCR

Students Who Have SSCR History

Request NSLDS ADD Student To SSCR Roster

Next SSCR Roster

Students who complete programs long after their LDA.

Reporting matriculating students with no new aid disbursed at your school
Clearinghouse Processes: Mid Month Roster Response to Support Timely Reporting via NSLDS SSCR Roster

• If your school has submitted anything to the Clearinghouse between the first and eleventh of the month, a mid month roster may be run for your school.

• Assists with getting the most current information to NSLDS as swiftly as possible.

• Allows multiple enrollment statuses to be captured in one month.
ED Reporting Requirements

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#5 NSLDS Enrollment Reporting Statistics score must be >= 90%
#5 150% Reporting Requirement
NSLDS Use of Program Level Enrollment

- Prior to 2014, schools were only required to report campus level.
- 150% reporting places a time limit on a borrower’s eligibility for Direct Subsidized Loans.
- Reporting students with both campus/program level data is used to determine:
  - If Graduated before exceeding the 150% limit, qualifying for protection of their interest subsidies.
  - Or if exceeded the 150% limit, losing eligibility for interest subsidies.
- Now, schools are required to report both campus and program level data for their students.
<table>
<thead>
<tr>
<th>Campus-Level</th>
<th>Program-Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student Identifiers (SSN, Name, DOB, etc)</td>
<td>CIP Code</td>
</tr>
<tr>
<td>Enrollment Status</td>
<td>Credential Level</td>
</tr>
<tr>
<td>Status Start Date (effective date)</td>
<td>Published Program Length</td>
</tr>
<tr>
<td>Certification Date</td>
<td>Measurement</td>
</tr>
<tr>
<td>Anticipated Graduation Date</td>
<td>Published Program Length</td>
</tr>
<tr>
<td>Term Dates</td>
<td>Weeks in Title IV Academic Year</td>
</tr>
<tr>
<td>Move To OPEID</td>
<td>Program Begin Date</td>
</tr>
<tr>
<td>Program Indicator (Y/N)</td>
<td>Special Program Indicator</td>
</tr>
<tr>
<td>Program Enrollment Status</td>
<td>Program Enrollment Status Effective date</td>
</tr>
</tbody>
</table>
Percent certified with program enrollment by this location falls beneath minimum threshold, and the most recent roster for this location has not been returned and is late.

Enrollment Reporting Statistics

Display Options

<table>
<thead>
<tr>
<th>School Code: 067899</th>
<th>School Location Code: 06789900</th>
</tr>
</thead>
</table>

Display Statistics For: 
1. School
2. School Location

Apply

Late Roster Notification History

<table>
<thead>
<tr>
<th>Roster Date</th>
<th>Letter Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>04/24/2015</td>
<td>05/01/2015</td>
</tr>
</tbody>
</table>

Certification Statistics for Location

<table>
<thead>
<tr>
<th>Start Date</th>
<th>Evaluation Date</th>
<th>Students in Portfolio</th>
<th>Students Certified</th>
<th>Students Certified With Program Enrollment</th>
<th>Percent Certified</th>
<th>Percent Certified with Program Enrollment</th>
<th>Roster Records Returned</th>
<th>Roster Records in Error Returned</th>
<th>Roster Error Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>03/28/2015</td>
<td>06/01/2015</td>
<td>20,000</td>
<td>18,000</td>
<td>16,995</td>
<td>90.00%</td>
<td>84.98%</td>
<td>19,010</td>
<td>1,010</td>
<td>5.31%</td>
</tr>
<tr>
<td>02/25/2015</td>
<td>05/01/2015</td>
<td>20,000</td>
<td>18,000</td>
<td>18,000</td>
<td>90.00%</td>
<td>90.00%</td>
<td>18,500</td>
<td>500</td>
<td>2.70%</td>
</tr>
<tr>
<td>01/26/2015</td>
<td>04/01/2015</td>
<td>20,000</td>
<td>18,000</td>
<td>18,000</td>
<td>90.00%</td>
<td>90.00%</td>
<td>18,500</td>
<td>500</td>
<td>2.70%</td>
</tr>
<tr>
<td>12/26/2014</td>
<td>03/01/2015</td>
<td>20,000</td>
<td>18,000</td>
<td>18,000</td>
<td>90.00%</td>
<td>90.00%</td>
<td>19,000</td>
<td>1,000</td>
<td>5.26%</td>
</tr>
</tbody>
</table>
#5 Meet and Beat the 90% Threshold

Want to learn more about the Enrollment Reporting Statistics Score?

- **Clearinghouse Academy Webinar**: “Meet & Beat the NSLDS 90% Threshold Effective Partnership Between Financial Aid & Registrar Offices”

- **Compliance Central Blogs**:
  - “Do You Know Your NSLDS Reporting Score”
  - “Important Information About Your NSLDS Enrollment Reporting Score”
Transparency

Easier and more effective compliance reporting experience
How the Clearinghouse Supports You in this Process
Audit Resource Center

YOUR resource dedicated to assisting with...

Annual A-133

Program Review Audits

Day-to-day enrollment reporting compliance questions
Create awareness surrounding compliance issues as it relates to enrollment reporting.
ARC Department Support for your Institution’s Compliance Health

- Provide training and education for the evolving compliance reporting expectations
- Aid in enrollment reporting inquiries for student aid compliance
- Support your school during an Audit to mitigate unnecessary audit findings & offer long term, sustainable solutions to avoid recurring findings
ARC Department Support for your Institution’s Compliance Health

Reduce and eliminate erroneous potential audit findings

Audit findings
Audit Resource Center

**CAN** provide guidance in

✓ Reviewing best practices and policies

✓ Understanding meaning of federal regulations

• *NSC refrains from determining your school’s practices and policies, but will provide guidance.*
Information and support to keep YOU in compliance.

Reporting Data
How to report student data to the Clearinghouse

Fixing Errors
What you need to know about viewing and fixing errors

Maintaining Compliance
Best practices and reminders to help you maintain compliance

Getting Audited
Support and resources to help simplify the audit process for you

studentclearinghouse.org/compliancecentral

Since 1993, the National Student Clearinghouse has been higher education’s trusted and secure partner committed to privacy and transparency. Our free Enrollment Reporting service provides institutions with automated enrollment verification and deferent reporting to the Department of Education and education finance industry. This improves data accuracy and helps institutions stay in compliance, while reducing their workload. Through Compliance Central, the Clearinghouse Academy, and our Audit Resource Center, we provide educational institutions with the resources and support they need to comply with complex regulations.
Clearinghouse Academy

- Live events and webinars
- Tutorials and recorded webinars
- User help and FAQs
- User guides and documentation
- Links to Audit Resource Center, Compliance Central, and more

Visit clearinghouseacademy.org
Clearinghouse Support

Easier and more effective compliance reporting experience
Questions?

Compliance Questions
AuditResource@studentclearinghouse.org

Audit Resource Center Blog
https://studentclearinghouse.info/audit/blog/

Compliance Central
https://compliancecentral.org/

General Questions
Service@studentclearinghouse.org