Gainful Employment Reporting to NSLDS March 2015

Gratefully pilfered excerpts from Jeff Baker's and Erik Melis' webinar | Jan. 2015 – U.S. Department of Education

Agenda

- Introduction
- Gainful Employment Overview
  - Gainful Employment Programs
  - Gainful Employment Regulations
  - Gainful Employment Implementation
  - Debt-to-Earnings Calculation Process
- Gainful Employment Reporting
  - GE Data
  - NSLDS GE Reporting Details
  - Reporting Accuracy
  - Organizing Your Data

Agenda cont.

- GE Reporting to NSLDS
  - Understanding the Record Layout
  - Reporting Methods
  - Basics of Reporting
    - Online Add
    - Submittal Spreadsheet
    - Batch Submittal (Fixed and CSV)
- Case Study
  - Single Program in 2 Award Years

Agenda cont.

- Review GE Data
- GE Report
  - Extract to Review Data
- Updating GE Data
  - Single Record Update
  - Single Record Deactivate
  - Online Mass Update/Deactivate
- What's Ahead
- Questions

Gainful Employment Overview

Gainful Employment Regulations

- Regulations defined "gainful employment in a recognized occupation"
- Three sessions of negotiations held without reaching consensus
- Notice of Proposed Rulemaking published on March 25, 2014
- Over 95,000 comments received
- Final rule published October 31, 2014
- Effective July 1, 2015

Gainful Employment Regulations

- Certifications of existing GE Programs
- Disclosures
- Reporting

Gainful Employment Regulations

- Program leads to Gainful Employment if:
  - Debt to earnings ratio is no more than 8% of average annual income or 20% of average discretionary income for 2-year cohort or 4-year cohort
- For 2014-2015 calculation year:
  - 2-year cohort is comprised of students graduating in 2010-2011 and 2011-2012 award years
  - 4-year cohort is comprised of students graduating in 2008-2009, 2009-2019, 2010-2011, and 2011-2012 award years
- Three levels: passing, zone, and failing
- Program ineligible if it fails two of three consecutive years or fails or is in the zone four consecutive years – No CCC's in failing category

Gainful Employment Programs

The HEA provides that to be Title IV eligible an educational program must be offered by:

A public or non-profit postsecondary educational institution and leads to a degree; or

Any institution, if the program prepares students for "*gainful employment* in a recognized occupation."

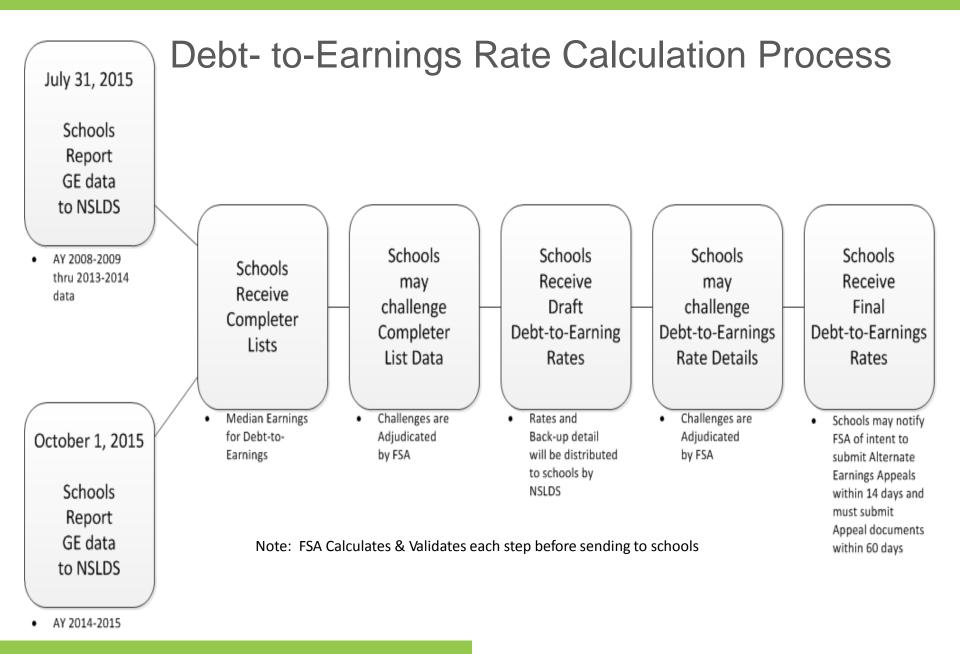➢ **Generally, all non-degree programs must lead to *gainful employment***

➢ Generally, all programs at for-profit institutions must lead to *gainful employment*

Gainful Employment Programs

- At public institutions and not-for-profit institutions, all Title IV eligible, non-degree programs are GE Programs except for –

  - Programs of at least two years in length that are designed to be fully transferable to a bachelor's degree program

  - Preparatory coursework necessary for enrollment in an eligible program

Gainful Employment Implementation

Reporting

July 31, 2015
(for 2008/2009 to 2013/2014 data)

Oct 1, 2015
(for 2014/2015 data)

Program Certifications

Dec 31, 2015

Draft Debt-to-Earnings Rates

Summer 2016

Disclosures

Jan 31, 2015

(per Current Regulations)

Disclosures

Jan 1, 2017

(per New Regulations)

Debt- to-Earnings Rate Calculation Process

July 31, 2015

Schools Report GE data to NSLDS

- AY 2008-2009 thru 2013-2014 data

October 1, 2015

Schools Report GE data to NSLDS

- AY 2014-2015

Schools Receive Completer Lists

- Median Earnings for Debt-to-Earnings

Schools may challenge Completer List Data

- Challenges are Adjudicated by FSA

Schools Receive Draft Debt-to-Earning Rates

- Rates and Back-up detail will be distributed to schools by NSLDS

Schools may challenge Debt-to-Earnings Rate Details

- Challenges are Adjudicated by FSA

Schools Receive Final Debt-to-Earnings Rates

- Schools may notify FSA of intent to submit Alternate Earnings Appeals within 14 days and must submit Appeal documents within 60 days

Note: FSA Calculates & Validates each step before sending to schools

Gainful Employment Reporting

GE Reporting

- GE reporting will begin late January – early February 2015 – can begin now but not required

- Report all Title IV Students by July 31, 2015
  - Report 2008 – 2009 through 2013 – 2014 award years
  - Programs with Medical and Dental Residencies report 2007 – 2008 through 2013 – 2014 award years

- Report 2014 – 2015 Award Year by October 1, 2015

GE Reporting

- **ONLY** submit data on students who were enrolled in a GE program
- **ONLY** submit data on Title IV aid recipients (exclude Federal Work Study and FSEOG only recipients)
- **ONLY** submit data for programs that exist as of July 1, 2015 (i.e. if program existed in a prior year but won't exist for the coming year, do not report it)

- Data provided in 2011 will not be available to reuse

GE Data - Students to Include

- All Title IV students enrolled in GE Programs

- A student enrolled in more than one GE Program must be reported separately for each program.

- A student who 'stopped out' and re-entered the same GE Program during the _same_ award year must be reported separately for each enrollment.

- A student who was enrolled in the same GE Program during _multiple_ award years must be reported separately for each award year.

GE Data to Report

- Institution Data

- GE Program Information

- Student Data

- Financial Data for Students

GE Data to Report cont.

- Institution Data
  - Institution Code (OPEID)
  - Institution Name

GE Data to Report cont.

- GE Program Information
  - Program Name
  - Award Year
  - CIP Code (NCES 2010 version)
  - Credential Level
  - Medical or Dental Internship or Residency
    not applicable for CCCs
  - Length of GE Program
  - Length of GE Program Measurement

GE Data to Report cont.

- Student Data
    - Student Social Security Number
    - Student First Name
    - Student Middle Name or Initial
    - Student Last Name
    - Student Date of Birth

GE Data to Report cont.

- Student Data continued
  - Student's Enrollment Status as of the 1st Day of Enrollment in Program (Full-Time, Three-Quarter Time, Half-Time, and Less Than Half-Time) Will remain the same for subsequent reporting
  - Program Attendance Begin Date
  - Program Attendance Begin Date for this Award Year July 1 for continuing students
  - Program Attendance Status During Award Year (Graduated, Withdrew, Enrolled)
  - Program Attendance Status Date June 30 for continuing students, **actual** date for graduated or withdrawn

GE Data to Report cont.

- Financial Data for Students Report at time of graduation or withdrawal, report full amounts
  - Private Loans Amount
  - Institutional Debt Amount owed to college at time of graduation or withdrawal
  - Tuition and Fees Amount **Actual** amount assessed the student
  - Allowance for Books, Supplies, and Equipment From Cost of Attendance

  - Note: The lower of tuition and fees, plus books, supplies and equipment, or the total debt will be used to calculate debt to income ratios.

NSLDS GE Reporting Details

- Program Attendance Status During Award Year
  - '**G**' (Graduated) If student graduated from their educational program at any time during the award year
  - '**W**' (Withdrew) If student withdrew from the educational program at any time during the award year
  - '**E**' (Enrolled) If student was enrolled in the educational program on the last day of the award year, June 30

NSLDS GE Reporting Details cont.

- Credential Level
  - Credential Level of the program the student was enrolled during this award year.

    - '01' (Undergraduate certificate or Diploma Program)
    - '02' (Associate's degree)
    - '03' (Bachelor's degree)
    - '04' (Post baccalaureate certificate)
    - '05' (Master's degree)
    - '06' (Doctoral degree)
    - '07' (First professional degree)
    - '08' (Graduate / professional certificate)

NSLDS GE Reporting Details cont.

- Length of GE Program
  - The length of the instructional program in weeks, months, or years as published by the school –
    - Format "nnnnnn", with an implied decimal point between the third and fourth digits

- Length of GE Program Measurement
  - The unit of measure for the length of the instructional program as published by the school
    - 'W' (Weeks)
    - 'M' (Months)
    - 'Y' (Years) – confirmed as academic years, not calendar years

NSLDS GE Reporting Details cont.

- Student's Enrollment Status as of the 1st Day of Enrollment in Program Will not change
  - Code for the student's enrollment status in that program
    - 'F' (Full-Time)
    - 'Q' (Three-Quarter Time)
    - 'H' (Half-Time)
    - 'L' (Less Than Half-Time)
- Allowance for Books, Supplies, and Equipment
  - Allowance amount in Cost of Attendance for books, supplies, and equipment

Reporting Accuracy

- Data Quality
  - Completeness
  - Accuracy
  - Consistency
- Data Quality Reviews

Organizing Your Data

- Determine how much data you have

  - Will help you decide how to report it

- Become familiar with the GE Submittal File Detail Record

  - Will help you gather accurate data

Suggested Ways to Organize Your Data

- Single Program by Award Year
- Single Program by Multiple Award Years
- Multiple Programs in a Single Award Year
- Multiple Programs in Multiple Award Years

GE Reporting to NSLDS

Understanding the Record Layout

GE Submittal File Detail Record		Student Social Security Number		
Field Code	**Mandatory/ Mandatory Conditional/ Optional**	**Type**	**Size**	**Position**
002	M	Char.	9	12-20
Description	Social Security Number (SSN) of a student enrolled in a GE Program.			
Comments	• Must provide SSN along with the identifiers First Name, Last Name, and DOB. • If an institution believes the NSLDS data are incorrect, contact the data provider and provide them with verifying documents. • If the information provided in this field is found to be incorrect, the entire record must be deactivated online and re-added. • If SSN is not available, do not report this student.			
Edit Level	**Error Code**	**Error**		
Record Level	001	Required Field		
Record Level	005	Invalid Format		
Record Level	009	SSN conflict		
Date Revised	January 18, 2015			

Understanding the Record Layout

Optionality Explained

M = Mandatory

- Must be populated in all instances
- If not populated record will be rejected
- For Example: SSN, DOB, First Name, etc.

Understanding the Record Layout

Optionality Explained

O = Optional

- Does not have to be populated
- If populated, edits will be run against it
- For Example: Student Middle Name

Understanding the Record Layout

Optionality Explained

M/C = Mandatory / Conditional

- Must be populated when other fields are populated
- Otherwise it is to be left blank or filled with specified default values
- For Example: Program Attendance Status Date– this date is filled with zeroes (default value) or with June 30th of the award year being reported until Program Attendance Status During Award Year is populated with G or W
- Private Loans Amount / Institutional Debt / Tuition and Fees Amount / Allowance for Books, Supplies, and Equipment – these amounts are left blank until Program Attendance Status During Award Year is populated with G or W

Reporting Methods

Schools report GE Data to NSLDS using one of the following methods -

- Online
  - GE Add
  - GE Submittal Spreadsheet
- Batch
  - Fixed-Width
  - Comma Separated Values (CSV)

Basics of Reporting – Online Add

GE Submittal Spreadsheet Upload

GE Batch File

via NSLDS online

GE Online Add

via SAIG

Basics of Reporting – Online Add

Online Add

- One record per student added at a time
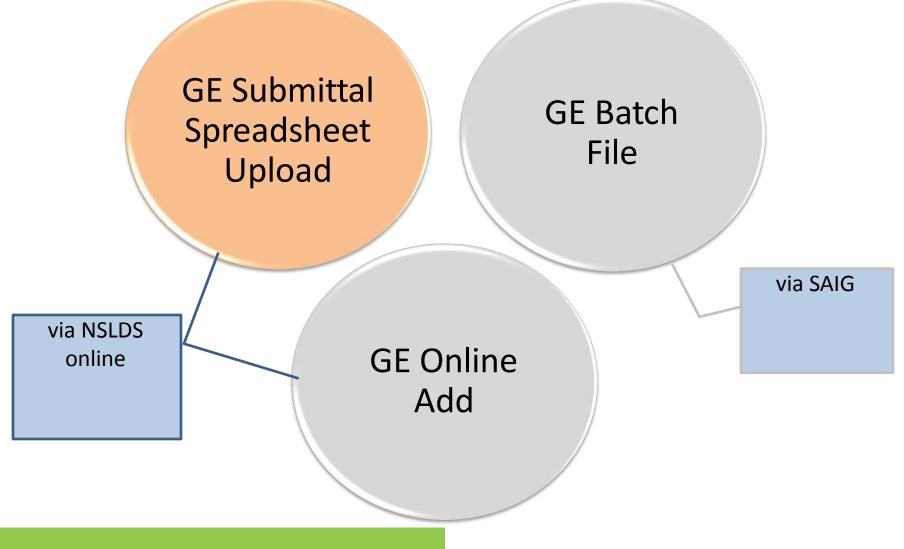- All data submitted via the NSLDS screen

How and Why – Online Add

- Recommended method for schools with smaller number of records

- Data can be gathered manually and is keyed in rather than loaded electronically

- Errors are presented to the user in real time for correction

Adding Records Online

Click Add Gainful Employment

Click GE List

Basics of Reporting – Submittal Spreadsheet

GE Submittal Spreadsheet Upload

GE Batch File

GE Online Add

via NSLDS online

via SAIG

Basics of Reporting – Submittal Spreadsheet

Submittal Spreadsheet

- One or more records added at a time

- Can add more than one award year at a time

- All data submitted online

- Option to validate data or validate and submit

How and Why – Submittal Spreadsheet

- Well suited for schools with moderate sized GE populations

- Useful for schools with limited IT support

- Immediately know how many records loaded and how many had errors

- Errors can be worked immediately and resubmitted

GE Submittal Spreadsheet

Updated NSLDS Gainful Employment Submittal Spreadsheet coming in late January – early February 2015

	A	B	C	D	E	F	G	H	I
1	Award Year	Student Social Security Number	Student First Name	Student Middle Name	Student Last Name	Student Date of Birth	Institution Code	Institution Name	Program Name
2	20102011	000-11-2222	First	Middle	Last	1966-07-21	06789900	Test School Name	Test Program Name
3	20102011	111-22-2222	First	Middle	Last	1966-07-21	06789900	Test School Name	Test Program Name
4	20102011	223-01-0001	First	Middle	Last	1966-07-21	06789900	Test School Name	Test Program Name
5									

GE Submittal Spreadsheet cont.

Basics of Reporting – Batch Reporting

GE Submittal Spreadsheet Upload

GE Batch File

GE Online Add

via NSLDS online

via SAIG

Batch Reporting

- Batch Reporting
  - Fixed-Width
  - Comma Separated Values (CSV)

- Message Classes to Send to NSLDS
  - Fixed-Width (GESFLEIN)
  - Comma Separated Values (GESCDEIN)

Batch Reporting cont.

- Setup GE Batch Services on www.fsawebenroll.ed.gov
- File layouts are available on www.ifap.ed.gov
- Updated NSLDS Gainful Employment User Guide coming soon

How and Why – Fixed Width

- Recommended method to report files with large numbers of records
- Typically created by a large IT system from data extract
- Can also be manually created using a text editor

Fixed-Width

GE Submittal File Detail Record   *Length = 585*

POS FR	POS TO	Field Name	Description	Format	Length
1	3	Record Type	A 3-digit number that indicates detail record. '001' indicates detail record.	Num.	3
4	11	Award Year	Award Year the student was enrolled in the program. (Example: the award year of July 1, 2008 – June 30, 2009 would be identified as 20082009.) Format: CCYYCCYY	Char.	8
12	20	Student Social Security Number	Social Security Number (SSN) of a student enrolled in a GE Program.	Num.	9
21	55	Student First Name	Student's current first name. 'NFN' for students with no first name.	Char.	35
56	90	Student Middle Name	Student's current middle name. If no middle name, populate with spaces.	Char.	35
	125	Student Last Name	Student's current last name. 'NLN' for students ... me.	Char.	35

Contents of a File – Fixed Width

Each file consists of 3 types of records

- ➢ Single Header Record
  - Contains file level information regarding the school, file type and submittal date
- ➢ One or more Detail Record(s)
  - Contains detail level information regarding a particular student and their attendance in a GE Program
- ➢ Single Trailer Record
  - Contains file level information regarding the number of records contained in the file

How and Why CSV

- Recommended method to report files with high numbers of records, when no large IT system available to export records

- Can be created by using Excel, which inserts the commas for you

- Can also be manually created using a text editor

Comma Separated Values (CSV)

GE Submittal File Detail Record

Field Name	Description	Format
Record Type	A 3-digit number that indicates detail record. '001' indicates detail record.	Num.
Comma	Comma	Char
Award Year	Award Year the student was enrolled in the program. (Example: the award year of July 1, 2008 – June 30, 2009 would be identified as 20082009. Format: CCYYCCYY	Char.
Comma	Comma	Char
Student Social Security Number	Social Security Number (SSN) of a student enrolled in a GE Program.	Num.
Comma	Comma	Char
Student First Name	Student's current first name. 'NFN' for students with no first name.	Char.
Comma	Comma	Char
Student Middle Name	Student's current middle name. If no middle name, populate with spaces.	Char.
		Char

Contents of a File - CSV

Each file consists of 3 types of records

- ➢ Single Header Record
  - Contains file level information regarding the school, file type and submittal date
- ➢ One or more Detail Record(s)
  - Contains detail level information regarding a particular student and their attendance in a GE Program
- ➢ Single Trailer Record
  - Contains file level information regarding the number of records contained in the file

CSV Explained

- Format a blank spreadsheet as text
- First row will be the header record
- Second row will begin the detail record(s)
- Enter data into spreadsheet, one data element per column following the Gainful Employment Guide
- For data elements of 'Filler', leave column empty
- Last row will be the trailer record

CSV Explained

- Excel sample:

	A	B	C	D	E	F	G	H	I
1	000		GE STUDENT SUBMITTAL	20150113	S		06789900		
2	001	20072008	0000009913	James	A	Brown	19881001	06789900	North South
3	001	20082009	0000009913	James	A	Brown	19881001	06789900	North So
4	999		2		06789900				

(partial record)

**Important to remember to format entire spreadsheet as text.

Case Study

Understanding the Case Study

- Case Studies are examples:
  - DO: Explain how to report successfully using different methods
  - DON'T: Represent the only method of reporting for a particular situation
- GE Submittal Spreadsheet, Online Add and Batch submittal files can ALL be used for submitting ALL data represented in these Case Studies

Case Study-Single Program in Two Award Years

James started his Auto Mechanics GE Program course on May 15, 2008 and finished it on June 20, 2009, without taking any time off. So he was enrolled in the program in Award Year 2007-2008, and Award Year 2008-2009.

Name: James A. Brown

SSN: 000-00-9913

DOB: 10/1/1988

CIP: 150803

Case Study-Single Program in Two Award Years

Data Elements 1 through 9

	A	B	C	D	E	F	G	H	I
1	Award Year	Student Social Security Number	Student First Name	Student Middle Name	Student Last Name	Student Date of Birth	Institution Code	Institution Name	Program Name
2	20072008	0000009913	James	A	Brown	10/1/1988	06789900	North South University	Complete Engine Rebuild
3	20082009	0000009913	James	A	Brown	10/1/1988	06789900	North South University	Complete Engine Rebuild

Case Study-Single Program in Two Award Years

Data Elements 10 through 16

	J	K	L	M	N	O	P
1	CIP Code	Credential Level	Medical or Dental Internship or Residency	Program Attendance Begin Date	Program Attendance Begin Date for This Award Year	Program Attendance Status During Award Year	Program Attendance Status Date
2	150803	01	N	05/15/2008	05/15/2008	E	06/30/2008
3	150803	01	N	05/15/2008	07/01/2008	G	06/20/2009

Case Study-Single Program in Two Award Years

Data Elements 17 through 23

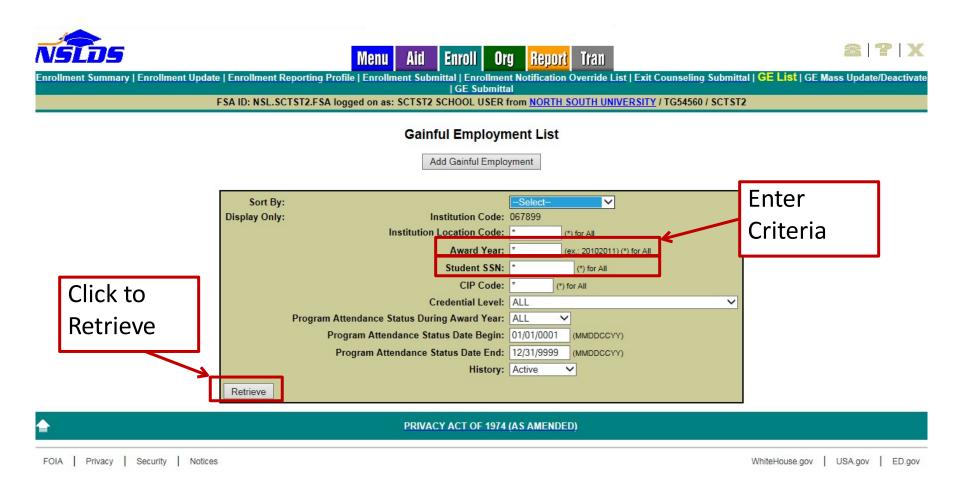|	Q	R	S	T	U	V	W
1	Private Loans Amount	Institutional Debt	Tuition and Fees Amount	Allowance for Books, Supplies, and Equipment	Length of GE Program	Length of GE Program Measurement	Student's Enrollment Status as of the 1st Day of Enrollment in Program
2					18	M	F
3	1750	0	1250	500	18	M	F

Review GE Data

Review GE Data

Gainful Employment List allows you to retrieve GE data once it has been populated on NSLDS -

- Review for data completeness
- Review for data accuracy
- Review for data consistency

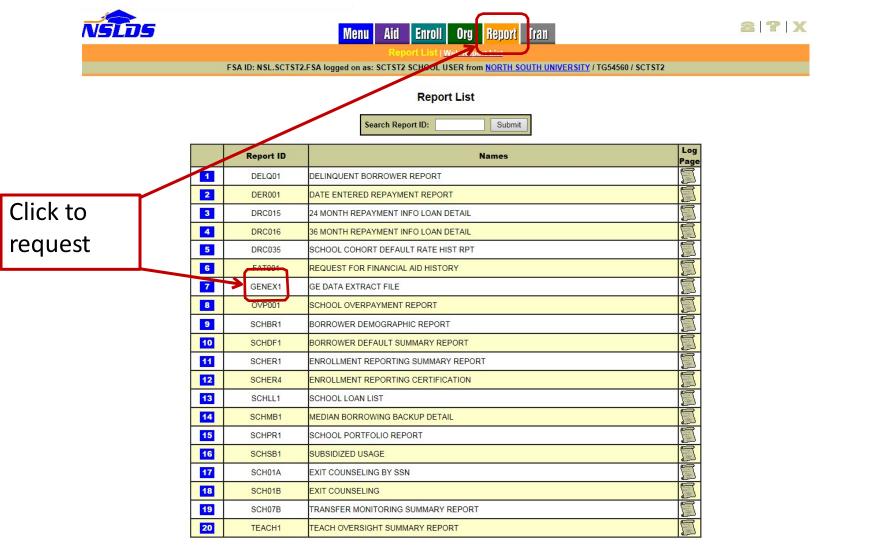# Review GE Data for Single Records

GE Report

Gainful Employment Data Extract File Record Layout (GENEX1) -

- Allows school users to request an ad-hoc fixed-width extract of the Gainful Employment data supplied by the institution
- Data supplied by all submission methods is present in report
- Can be requested by multiple parameters to create a more individualized method of data review

Extract to Review Data

Extract to Review Data cont.

- Data extracted will match the criteria input to the Report Parameter screen exactly

- File will be delivered to the SAIG mailbox associated with the FSA User ID which made the request

- File will be delivered using the message class of AHSLDEOP

Updating Data

Updating GE Data

Once a record has been identified and one or more corrections are needed, several methods are available to make those corrections -

- Single Record Update
- Single Record Deactivate
- Mass Update/Deactivate

Online Mass Update/Deactivate

- Allows user to select records already on NSLDS using Search and Filter criteria for update or deactivation

- Can only be performed one Award Year at a time – update cannot cross award years

- Can only be performed for a single location at a time – cannot update multiple locations

- Can only be performed for a CIP Code and Credential Level Combination

Online Mass Update/Deactivate cont.

- Only records which match the Filter fields will be identified for update/deactivation
- All records will have the same changes applied when updated
- If no records match the Filter fields, no updates will be made
- Use Caution with the deactivate function, as it cannot be reversed

Errors and Problem Resolution

- Gainful Employment User Guide
  - http://ifap.ed.gov/nsldsmaterials/NSLDSGainfulEmploymentUserGuide021115.html

- Gainful Employment January 2015 Webinar
  - http://ifap.ed.gov/dpcletters/ANN1501.html

- Gainful Employment File Layouts
  - http://ifap.ed.gov/eannouncements/010915GE51NSLDSSubmittalFileRecordLayouts.html

Data to NSLDS

Customer Support Center:

- Phone: 1-800-999-8219
- Toll: 785-838-2141
- Fax: 785-838-2154
- Web: www.nsldsfap.ed.gov
- E-mail: nslds@ed.gov
- Policy Questions: ge-questions@ed.gov

QUESTIONS?

Gainful Employment Information Page:
http://www.ifap.ed.gov/GainfulEmploymentInfo/indexV2.html