



Draft Cohort Appeal

The Incorrect Data Challenge



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What is a cohort?

- Group of students who entered repayment in same fiscal year





Federal fiscal years

- Fiscal years run from Oct. 1 – Sept. 30
 - FY2006: Oct. 1, 2005 – Sept. 30, 2006





FY2006 cohort

- Includes students who entered repayment:
 - Oct. 1, 2005 – Sept. 30, 2006



Cohort default rate

- Percentage of students in cohort who default in the year they enter repayment or the following year
- Calculated by ED
- Based on NSLDS data



Cohort equation

students entered repay in cohort year
and defaulted in cohort or following year

students entered repay in cohort year

Numerator

Denominator





FY2006 cohort default rate

- Percent students who entered repayment in FY2006 and defaulted in FY2006 or FY2007
 - numerator is number of students who entered repayment in FY2006 & defaulted in FY2006 or FY2007
 - denominator is number of students who entered repayment in FY2006



FY2006 schedule

- Draft rates
 - calculated Jan. 5, 2008
 - released Feb. 11, 2008
- Official rates
 - calculated Aug. 2, 2008
 - released Sept. 15, 2008



Draft cohort rate file

- Sent electronically to school's SAIG mailbox
- Schools must retrieve from their SAIG mailbox
- File includes:
 - cover letter
 - *Loan Record Detail Report* in print and analysis formats





Loan Record Detail Report

- Lists loans used to calculate cohort default rate



Loan Record Detail Report

SSN	Last name	Originating	Current	Type	Stat
0	LENDER/SVCR/HOLDER -			Loan -	
0001-01-0001	CHARM	8888888888	9999999999	SF	RP
0001-01-0001	CHARM	8888888888	9999999999	SU	RP
0002-00-0001	XU	0101		D1	DU
0003-00-0001	JACKSON	0101		D1	DA



Loan Record Detail Report

- Common loan type codes
 - SF = Subsidized Stafford
 - SU = Unsubsidized Stafford
 - CL = Consolidation Loan
 - PL = PLUS Loan





Loan Record Detail Report

```

----- SSN      Last name
-----
0 - LENDER/SVCR/HOLDER - -- Loan
  Originating Current   Type Stat
-----
0001-01-0001  CHARM
  8888888888  9999999999  SF  RP
0001-01-0001  CHARM
  8888888888  9999999999  SU  RP
0002-00-0001  XU
  0101                0101  D1  DU
0003-00-0001  JACKSON
  0101                0101  D1  DA

```



Loan Record Detail Report

- Common loan status codes
 - CA = Cancelled
 - DA = Deferred
 - DU = Defaulted, Unresolved
 - RP = Repayment
 - PC or PN = Consolidated
 - PF = Paid in full



Loan Record Detail Report

```

----- CLASS ----- Academic
Begin Date End Date   Level
-----
by Enrollment Stat/ Usage
Date Code Date      1 2
-----
10/02/1995 06/14/1996 1
1995 W 06/14/1996 D FD
10/02/1995 06/14/1996 1
1995 W 06/14/1996 E E
10/02/1995 06/14/1996 1
1995 W 09/20/1996 B DB
10/02/1995 06/14/1996 1
1995 W 09/20/1996 D DD

```





Loan Record Detail Report

- Common loan type codes
 - D = Denominator
 - B = Numerator and denominator
 - N = Not used
 - E = Eligible but not counted



Questions





Incorrect Data Challenge

- Allows schools to correct errors in the draft cohort rate data



What may be challenged?

- Incorrect data
- Students incorrectly included/excluded



Appeal example 1

- Student repay date based on separation date from School A
- Student enrolled at School B during grace period of School A loans
- Challenge repay date because it should be based on separation date from School B, not School A



Appeal example 2

- Student has a repay date in FY2006
- Student paid loan in full during FY2005 before entering repayment
- Challenge because repay date should be paid-in-full date
- Loan should be in FY2005 cohort instead of FY2006



Filing Incorrect Data Challenge (IDC)

- Electronic appeal process available for FY2006 challenges
- FY2006 schools have option to use either paper or electronic process
- Paper IDC will be phased out



Filing paper IDC

- Step #1
 - retrieve and review Loan Record Report for inaccurate data
- Step # 2
 - Decide which inaccurate data to challenge
 - gather documents to support each challenge



Filing paper IDC

- Step #3
 - create spreadsheet of challenge data
 - separate entry for each inaccurate loan record





Filing paper IDC

- Step # 6
 - assemble appeal, including:
 - spreadsheet
 - supporting documentation
 - *Loan Record Detail Report* pages
 - cover letter



Filing paper IDC

- Step #7
 - send by certified mail or overnight commercial delivery
 - mail appeal to data manager/guarantor
 - mail copy to ED Default Prevention and Management



Filing electronic IDC

- Step #1
 - retrieve and review *Loan Record Detail Report* for inaccurate data
- Step #2
 - decide which inaccurate data to challenge
 - gather documents to support each challenge



Filing electronic IDC

- Step #3
 - register
 - school's Destination Point Administrator (DPA) initiates process
 - <http://www.ifap.ed.gov/DefaultManagement/DefaultManagement.html>



Filing electronic IDC

- Step #3 (continued)
 - Destination Point Administrator (DPA)
 - same as SAIG DPA
 - approves other users
- Other types of users
 - school case preparers
 - school case managers



Filing electronic IDC

- Step #4
 - ED loads *Loan Record Detail Report*
 - filing deadline extended by number of days it takes ED to load report
 - notified by e-mail when process complete
- Step #5
 - create electronic case file
 - select or add borrowers to be appealed
 - add supporting documentation





Filing electronic IDC

- Step #6
 - submit electronic case file
 - must be done by case manager
 - data manager notified by e-mail



Filing electronic IDC

- Requests for information and responses
 - done through system
 - using e-mail notification



Filing Incorrect Data Challenge

- Filing deadline:
 - must send within 45 days of receiving appeal documents
 - clock starts six business days after electronic files released
 - late appeals cannot be reviewed



Guarantor/Data Manager's role

- Review appeal & decide if agree or disagree
- Send response to school and ED within 30 days
- Make changes to NSLDS before official rates calculated



ED/Default Manager's role

- ED Default Prevention and Management
 - reviews data manager's responses for accuracy
 - monitors submission deadlines



Questions





Contact information

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