

Webinar Q&A: AACRAO Presents – NSLDS Enrollment Statistics Page & Compliance

What resources does FSA make available to auditors and how does FSA ensure that auditors interpret regulations and guidance correctly?

All of the resources and guidance regarding enrollment reporting available to schools are available to auditors. FSA has also issued several communications recently that, in part, specifically address concerns about auditor's incorrect interpretations of enrollment reporting guidance. In addition, to clarify some of these issues, FSA is working on updates to the OIG Audit Guide.

A school admits students from abroad who are ineligible for federal financial aid because of their immigration status. Do those students need to be reported to NSLDS?

Only students who have previously received federal financial aid can be reported to NSLDS and NSLDS only places students who have previously received federal financial aid on a school's roster files. Assuming these students have never received federal financial aid, they should not be reported to NSLDS. In fact, if a school does report these students to NSLDS, the system will reject the enrollment reporting records. Although these students will in no way affect your enrollment report compliance percentages.

Why did the Department require schools to report program-level information about students' enrollment and how has this enhanced enrollment reporting?

In part, the addition of program-level enrollment reporting was to implement a statutory provision related to limiting subsidy eligibility for subsidized loan recipients. However, this information has long been necessary for the Department to perform policy analysis on the efficacy of Title IV programs.

A student is enrolled in a standard-term program, which uses three modules. The student attends the first and third module, but not the second. Should the student be reported as withdrawn as of the end of the first module and enrolled as of the beginning of the third module?

The student is not withdrawn from the school or the program during the second module (the module that the student did not attend), and should not be reported as such. However, because each term (payment period) is comprised of three modules and schools report the student's latest active enrollment for *the term*, dropping a module, if the student was originally scheduled for classes during that module, can cause the student's enrollment status to change. For example, from full-time to three-quarter time.

Are schools required to report a student's enrollment history in all programs in which the student was enrolled at the school?

Assuming a school has reported program-level enrollment properly since July 1, 2014 (the date when such reporting was required), it need only report the student's current program of study with each enrollment reporting submission, along with "terminal" statuses, such as graduated or withdrawn, for programs in which the student is no longer enrolled. A student's complete enrollment history does not need to be reported with each submission. Schools that have not reported program-level enrollment since July 1, 2014, must report the student's program-level enrollment history.

A student is enrolled at least half-time, but not to receive a degree or certificate. Can this student receive a deferment?

- For loans made under the William D. Ford Federal Direct Loan Program and the Federal Family Education Loan Program, students who are not enrolled in a program leading to a degree, certificate, or other credential can receive a deferment, if they are enrolled at least half time.
- For loans made under the Federal Perkins Loan Program, the student must be enrolled at least half time in a program that leads to a degree, certificate, or other credential to receive a deferment.

A student is not enrolled in a program leading to a degree, certificate, or other credential. Does this student need to be reported to NSLDS?

Schools must report enrollment information about all students who appear on their roster files whether or not the program leads to a degree or other credential. A student who is not enrolled in a program leading to a degree, certificate, or other credential *and* who is not enrolled in a program described in the "Special Program Indicator" of the NSLDS Enrollment Reporting file layout, must be reported at the campus level, but not at the program level. All other students should be reported at both the campus level and the program level.

The Department's guidance for reporting students who have not yet declared a major has been to use the General Studies CIP Code. However, if a school has a General Studies program, can it report another CIP Code?

For Federal Student Aid purposes, schools have flexibility on how they classify these students. However, in order to receive Federal Student Aid, a student must be enrolled in a defined program leading to a degree or certificate. If a student is enrolled in a program leading to a degree or certificate, but has not yet declared a major (including General Studies), the school must associate their enrollment with another CIP Code. Liberal Studies, another broad CIP Code closely related to General Studies, can also be an option here.

A school admits students who are also enrolled in high school as a part of a dual enrollment program. Does enrollment of these students need to be reported to NSLDS?

Only students who have previously received federal financial aid can be reported to NSLDS and NSLDS only places students who have previously received federal financial aid on a school's roster files. Assuming these students have never received federal financial aid, they should not be reported to NSLDS. In fact, if a school does report these students to NSLDS, the system will reject the enrollment reporting records. Although these students will in no way affect your enrollment report compliance percentages.

A school has a large percentage of enrolled students who are not working towards a degree, certificate, or other credential. This is causing the school's program-level enrollment reporting percentage to fall below the 90% threshold. What can the school do to be deemed in compliance with NSLDS enrollment reporting requirements?

Schools must report enrollment information for all students who appear on their roster files. A student who is not enrolled in a program leading to a degree, certificate, or other credential *and* who is not enrolled in a program that is described in the "Special Program Indicator" of the NSLDS Enrollment Reporting file layout, should be reported at the campus level, but not at the program level. All other students should be reported at both the campus level and program level.

If a school has a large number of these students at a campus who appear on its NSLDS enrollment roster, it will likely receive a compliance warning letter. The letter contains instructions on what to do if the school believes it has a legitimate reason to report fewer than 90% of its students with program-level enrollment.

Are schools required to report only programs in which its students are enrolled that are eligible for Federal Student Aid?

Schools must report *all* programs in which a student is enrolled, regardless of whether the program is eligible for Federal Student aid.

Are schools required to report enrollment for the summer term?

If a student is not enrolled or is enrolled less than half-time during the summer term *and* if the student is expected to return in the fall, the school must report the student's last enrollment status for the previous spring term through its summer enrollment reporting to NSLDS. FSA recently published an [Electronic Announcement](#) on this issue, and recommends all schools review it.

A school has been reporting the student's spring enrollment status throughout the summer months, but the student did not return as expected in the fall.

What should be reported?

- If the student was not enrolled at all during the summer term, the school must report the student as withdrawn retroactively to the spring term.
- If the student was enrolled during the summer term, the school must report the student as having withdrawn or graduated, as appropriate.

FSA recently published an [Electronic Announcement](#) on this issue, and recommends all schools review it.

A student is enrolled for the purposes of receiving a degree, certificate, or other credential at one school (the "home school"), but is temporarily enrolled at another school to take some courses (the "host school"). Which school should report the student's enrollment?

These students are sometimes called visiting or transient students. If these students are not enrolled in a program leading to a degree or certificate at the host school, but are enrolled in a program leading to a degree or certificate at the home school, they should be reported by the home school using information obtained from the host school. The host school should not report them. This is the case even if 1) the home and host school are operating under a consortium or other written arrangement and 2) either the home or host school can disburse aid to the student, as defined by the arrangement.

Can schools add additional Enrollment Reporting Contacts to receive the Enrollment Reporting Compliance notification emails?

The first compliance notification email is sent to 1) the FAA contact listed in PEPS and 2) the Enrollment Reporting contact provided by the school on the Organization (Org) Tab of the NSLDS website. Currently, schools can only have one Enrollment Reporting contact at a time. Please verify that your Enrollment Reporting contact is the most appropriate person for your school.

How does a school change the Published Program Length, if it is incorrectly reported (e.g., in months instead of in years)?

You can report a program-level enrollment status of "X" for the program(s) incorrectly reported in months, and re-report the history of that student's program status (with the same CIP code and Credential Level) in years. A new program with the correct length will be created and the old program removed. Wherever possible, schools should report any traditional program lengths in Years wherever possible and not in Months. For example, report programs as 4 years and not 48 months, or 2 years and not 24 months. Programs reported in months will be converted to years by NSLDS and the formula includes the "Weeks in Title IV Academic Year" value from the school. This can cause the length to be incorrectly long. For example a 48 month program would be converted to something longer than 6 years in most cases.

If a school doesn't find out about a withdrawal until some length of time after it happened, what should it report as the effective date? Will using the older date be considered late reporting (as some auditors have said)? Also what about graduation effective dates, if the status is not determined until sometime after the student finishes?

For the effective date, the school should use the actual date the student withdrew, as best as it can determine. As long as the school submits the update to NSLDS on the next reporting after they become aware of the withdrawal, it is not considered late reporting.

The same is true of graduation effective dates. If the school takes some time to determine whether a student meets graduation requirements, it should use the correct effective date when reporting the "G" status. This date will not be late, even if it occurred over 60 days in the past.

FSA posted an [Electronic Announcement](#) on [April 20, 2017](#) that goes into detail about the proper reporting of Effective Dates and Certification Dates to NSLDS. If schools get questions from auditors about this, they can point them to this guidance.

Why does NSLDS require an Anticipated Completion Date (ACD) for a student who has withdrawn from the school?

NSLDS does not require an ACD in this case. Anticipated Completion Date is not required for the following enrollment statuses: "W" (Withdrawn), "X" (Never Attended), "Z" (No Record Found), "L" (Less than half time), or 'D' (Deceased). See the [Enrollment Reporting Guide](#), Section 7.7.2.4 and Appendix B – Reporting Instructions.

How accurate must the Anticipated Completion Date (ACD) be?

The ACD should be set to the approximate date the school thinks the student would complete their current course of study assuming continuous enrollment.

Where can the College Scorecard be found?

The College Scorecard can be found at <https://collegescorecard.ed.gov/>.

What should schools do for program differences identified by the SCHE10 NSLDS-COD Comparison Report? Do these discrepancies affect the school's Enrollment Reporting Statistic percentage?

Please see [NSLDS Newsletter # 58](#) for information about this report. This report identifies students who have the same program reported by COD and/or the school, but with different credential level or program length. The school should verify which program information is correct, and remove any incorrect programs by certifying them with a status of "X" (never attended). This report can also indicate students who have programs reported via COD that have never been certified by the school. Because

these students can lower the school's Enrollment Reporting Statistic, their programs should be reported, if applicable.

How can schools see if they are compliant with the Program Enrollment Reporting requirements and whether their school has received a Compliance Notification?

The Enrollment Reporting Statistics are updated every month, around the third Wednesday of the month. Schools can view their last 12 months of statistics on the Enrollment Reporting Statistics page of the NSLDS website, which is accessed via the Enrollment Reporting Profile. This page also shows any compliance letters that have been sent to the school. The school can view the letter that was sent by email on this page. Please see [NSLDS Newsletter #49](#) and [Newsletter #58](#) for more information about the Statistics and the Compliance notifications.

Why do some students who left the school in the past get added back to the roster? Why do some students stay on the roster after they have been reported as Withdrawn or Graduated, even multiple times?

There are a number of ways that students are added to a school's enrollment roster/portfolio. Some of these can be identified on the NSLDS website. Any student receiving Title IV aid (Direct Loans or grants) is added to the roster of the location identified by the Enrollment School Code (OPEID) provided by the school to COD. These can be seen on Enrollment Detail by selecting "Reported By - All" under the Advanced Display Options. This will show if a student was added by COD, Servicer, or Guaranty Agency.

Students are also be added (or added back again) to a school's roster, if the school includes the student on any Transfer Student Monitoring (TSM) or Financial Aid History (FAH) request. Currently, the history of these requests cannot be seen on the website, but NSLDS has researched individual cases and found either a TSM or FAH request was submitted by the school. The Clearinghouse has found that schools may be unaware that software they use may be generating many TSM or FAH requests, which is causing these students to be added to the roster. NSLDS is looking into changing the process so TSM and FAH students will no longer added to rosters in the future.

NSLDS is unaware of any system issue with NSLDS causing students to be incorrectly placed on school's rosters, but will continue to research and take corrective action, if any problem is found.

In addition, students can report their own current or planned enrollment on the NSLDS Student Access website, servicers can report a student's enrollment to NSLDS, and the Enrollment Push to Roster function can allow a school to indicate a student is or will be attending a particular location. Any of these scenarios can cause a student to be added to the location's roster.

Terminal statuses of "W," "G," "X," and "Z" at the campus level must be reported two separate times: with the same Effective Date, but different Certification Dates before the student drops from the roster. There are some schools with older students who were certified only once years ago as "W" or "G" and are still on the roster. Because these students will count against the enrollment reporting statistic, they must be certified a final time and, if applicable, have the program information added.

Schools should also ensure they do not use the “roster reset” function without being very aware that doing so can add many older students back onto the roster, who will need to be recertified and can lower the statistic, unless the programs are reported.

How does a school remove students from the roster that never attended the school or haven't been at the school for years?

A student that has never attended should be reported with a status of “X” (never attended) or “Z” (no record found), on two subsequent submissions with the **same Effective Date, but different Certification Dates**. If any other errors occur when submitting these records, they will need to be resolved.

If you receive Error 22, it is because an active enrollment status of “F,” “Q,” “H,” “L,” or “A” was previously reported before an “X” or “Z” status. You can fix this by reporting the “X” or “Z” status with an Effective Date earlier than any other previously reported status for the student. This will inactivate the prior status.

If the student is on the roster with a terminal status, the status must be certified a second time with the same Effective Date and a new Certification Date.

Will schools who receive a Compliance Notification Letter be given time to resolve problems before getting a second notification or being referred to Program Compliance?

The enrollment compliance letters are being spaced a number of months apart to give schools time to address issues, after they receive a compliance notification letter, which they may have with program enrollment reporting.

What if a school has a significant percentage of students who are not in any degree or credential program and, therefore, unable to reach the established 90% level of program reporting?

If schools have significant numbers of students who are not in any program and are, therefore, unable to report students with programs above the current 90% minimum, they can request an exception by emailing the ERCompliance@ed.gov mailbox. Instructions will be sent to the school on what information to provide for the request.

We have started reporting programs for all of our students, but our Enrollment Reporting Statistic hasn't gone up in recent months. Why is this?

Each month, the Enrollment Reporting Statistics are based on the students who were on the roster as of the “Start Date,” which is 135 days prior to the “Evaluation Date.” The statistics evaluate how many of *these* students were successfully certified with program information at least one time between the “Start Date” and “Evaluation Date.” This gives the school plenty of time to certify program enrollment for new students added to the roster.

As a result, it can take several months for the changes you are making now to be fully reflected in the Enrollment Reporting Statistics. NSLDS is working on making a list of the students included in the latest calculation available to schools.

How can we tell which students need to have enrollment programs reported?

Schools can use the Enrollment Update on the NSLDS website. Under Advanced Search Options, check the “Exclude Students with Certified Programs” box and click “Retrieve.” This displays the Enrollment Maintenance page showing only students who have no programs or have programs reported via COD that need to be certified or removed. A count of these students is also displayed. See [NSLDS Newsletter #55](#) for more information.

Schools can also run the SCHER4 Enrollment Reporting Certification Report and the newer SCHER8 ER Program Level Certification Report (for the same date) from the Report tab of the NSLDS website. The SCHER4 shows the latest certification at the campus level for students. The SCHER8 shows only students who have had program information reported. Students not on the SCHER8 report may need programs reported.

Can NSLDS provide additional reports and tools to help schools meet their enrollment reporting compliance?

NSLDS continuously looks for ways to add to and improve the tools and reports available to schools, and welcomes any specific ideas or suggestions. NSLDS has a number of enhancements under evaluation at this time and will issue communications about these as soon as they are available.

Do schools need to inform NSLDS after they correct errors?

For Clearinghouse schools, the school should follow Clearinghouse procedures to correct errors. The Clearinghouse will submit the corrected data to NSLDS. For schools reporting directly to NSLDS, you should update and correct the information on the Error/ Acknowledgement file sent by NSLDS, then resubmit the corrected file to NSLDS via SAIG. You do not need to inform NSLDS that you have done this. Schools that report via the website will have to correct any errors in real time before the data can be loaded to NSLDS.

How can schools see what errors have been sent by NSLDS, either to the school or its servicer?

In December 2016, NSLDS introduced a new Enrollment Errors Report, SCHER5, which can be run from the Report tab of the NSLDS website. It provides all of the error files that have been sent by NSLDS during a user-specified period of time, along with the data sent by the school, and the error code(s). Students can appear on more than one file if they were submitted and errored more than once during the selected time frame. Please see [NSLDS Newsletter #56](#) for more information about this report.

How can schools get more information about the Enrollment Reporting process, in general, and about Program Enrollment reporting, and errors and how to fix them?

Schools should review the [Enrollment Reporting Guide](#), which is updated each year and is available on the Information for Financial Aid Professionals website, [IFAP](#). The guide contains detailed information about the whole Enrollment Reporting process, Program reporting, what data to report and how, and all the edit requirements. It also has details of all the website pages and reports and how to use them, and instructions on the Enrollment Spreadsheet Submittal process.

Each year NSLDS gives a presentation on Enrollment Reporting at the FSA Training Conference. These presentation slides and audio of the presentation are available on the IFAP website under Conferences. The [2014 presentation, Session 23](#) gave a detailed overview of Program Enrollment Reporting. The [2016 presentation Session 9](#) went into detail on the most common errors and how to fix them.

NSLDS has posted a number of Newsletters about Enrollment Reporting. They are all available on the [NSLDS Reference Materials](#) section of IFAP, along with report record layouts and information about other NSLDS processes.

Does the Enrollment Status Effective Date need to be the same as the Term Begin Date?

No, for the Clearinghouse, the enrollment status effective date needs to be captured when a status change occurs. The status effective date does not need to match the term begin date. If student decreases in status or separates, a status effective date must be provided.

The Clearinghouse requires a CIP code, but schools should only report the campus level for non-degree students. How do schools resolve this?

A valid six digit CIP code is required to be provided for all records with a Program Indicator of "Y." If the student is not in any program, set the Program Indicator to "N."

Where is the Program Indicator on the Clearinghouse file?

If you are submitting your enrollment data to the Clearinghouse in the EDI TS190 format, the Program Indicator is found in the SUM 03 statement. In the Clearinghouse's standard file format, the Program Indicator is found in detail record space # 674 (use "Y" to indicate that a student is enrolled in a program and "N" to indicate the student is not enrolled in any program).

Where should schools make corrections, on the Clearinghouse site or in NSLDS? What about students that are in NSLDS, but not in the Clearinghouse?

Student records can be added to the Clearinghouse via the student update functionality. It is important to submit updates to the Clearinghouse to ensure enrollment information in your student information

system is aligned with the information you have provided to the Clearinghouse. If you have questions about what needs to be corrected, contact the Clearinghouse at schoolops@studentclearinghouse.org.

When a school submits enrollment data to the Clearinghouse, the data is reviewed prior to being loaded to the Clearinghouse database. If the Clearinghouse has questions or identifies inconsistencies, you will be contacted to resolve those questions, before your data is reported out. After a school's data is submitted to the NSLDS, if any errors are identified by the NSLDS, the Clearinghouse will inform the school of the errors and provide suggestions for resolving.

Is there a way schools can report transient students during the summer so that they can use the other Clearinghouse services, such as enrollment verification, yet flag them so that the Clearinghouse doesn't report them to NSLDS?

Schools participating with the Clearinghouse can use the Advanced Registration option to report students, see http://studentclearinghouse.info/onestop/wp-content/uploads/EnrollRept_ProgrammingandTestingGuide.pdf.

We suggest you contact your Clearinghouse Client Management Representative to discuss.

How do schools that use the Clearinghouse to report fix errors which the Clearinghouse suggests the school contact NSLDS to resolve? Do registrar/records staff at other institutions have access to the NSLDS?

The Clearinghouse is aware that most registrar/records staff don't have access to the NSLDS. However, the NSLDS has specific procedures required for some corrections. It is important to submit updates to the Clearinghouse to ensure enrollment information in your student information system is aligned with the information you have provided to the Clearinghouse. NSLDS strongly recommends that someone in the registrar's office staff have access to NSLDS.

Can the Clearinghouse provide training on correcting enrollment reporting errors?

The Clearinghouse has an on-demand tutorial describing the process to correct NSLDS errors, which is available at <https://clearinghouseacademy.org/sscr-error-correction/>.

Do schools that use the Clearinghouse create their own SSCR/roster schedule?

Schools create an enrollment reporting schedule with the Clearinghouse, which is based on their academic calendar. The Clearinghouse creates an Enrollment Reporting Roster schedule for all schools with the NSLDS. The Clearinghouse suggests that schools **do not** change the schedule they have established with the NSLDS.

Can you provide George Levathes' email address?

George Levathes' email address at the Clearinghouse is levathes@studentclearinghouse.org.

What is the status of updating the Clearinghouse programming to add students that have a 666 prefix on their SSN?

The Clearinghouse has been discussing the issue regarding the use of the 666 SSN prefix and will notify our clients when we have an update.

For schools that use the Clearinghouse, what if the most recent Status is related to the first of term for the next semester and the last of term from the previous semester doesn't get reported?

In an effort to reduce the possibility of this scenario from happening, the Clearinghouse creates a schedule with the NSLDS to report on a monthly basis. However, the NSLDS reporting process requires the most recent enrollment information to be included on each response.

How do schools resolve situations where NSLDS has multiple SSNs for a student and the primary one is not the same as the one the school or the Clearinghouse has?

The NSLDS has a process for resolving SSN discrepancies. We suggest you contact the NSLDS Customer Service Center to resolve the issue. Remember to submit any necessary updates to the Clearinghouse.

How long does it take for NSLDS to process the enrollment information after the Clearinghouse sends it to NSLDS?

Typically, it takes the NSLDS 1-2 business days to process data submitted by the Clearinghouse.