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## Message from Milton

With the improving economy and with increasing numbers of applicants, it is quite likely that your financial aid office will be hard pressed to meet the current year and subsequent year demands on your offices. In addition to offering temporary support to assist you, staff at HEAG also write articles on topics of interest in support of such efforts. Two such articles are included in this edition of the HEAG Newsletter; one by James Dergay and the other by Duane Quinn.

Happy reading.

- *Milton Kerstein, President*

# IMPORTANT CHANGES

**Publication Date: January 18, 2012**

*DCL ID: GEN-12-01*

*Subject: Changes Made To The Title IV Student Aid Programs By The Recently Enacted Consolidated Appropriations Act, 2012.*

*Summary: The purpose of this letter is to provide institutions and Federal Family Education Loan (FFEL) program participants with information on changes made to the Title IV student assistance programs by Section 309 of the Department of Education Appropriations Act, 2012 (Title III of Division F of the Consolidated Appropriations Act, 2012 - Public Law 112-74).*

Dear Colleague:

On December 23, 2011, President Obama signed into law the Consolidated Appropriations Act, 2012 (Public Law 112-74).

The new law significantly impacts the Federal student aid programs authorized under Title IV of the Higher Education



Act of 1965, as amended (HEA). This letter provides information on the changes made to the Title IV student aid programs by Public Law 112-74 and the effective date of those changes.

**Auto-Zero EFC Income Threshold** - Public Law 112-74 amended HEA section 479(c) to reduce the income threshold for an automatic zero expected family contribution (EFC) from \$30,000 to \$23,000 for the 2012-2013 award year for both dependent and independent students. Because of statutorily required cost of living updating, the threshold for 2012-2013 was scheduled to be \$32,000, but now will be \$23,000. The FAFSA on the Web application and the Central Processing System (CPS) have been updated, and both began 2012-2013 FAFSA processing on January 1, 2012, using \$23,000 as the auto-zero EFC threshold.

**Ability-to-Benefit** - Public Law 112-74 amended HEA section 484(d) to eliminate Federal student aid eligibility for students without a "certificate of graduation from a school providing secondary education or the recognized equivalent of such a

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Two articles written by HEAG consultants:

- **Staffing Your Office in a Complex Environment** by Duane Quinn
- **Working with Gainful Employment Files** by Jamie Dergay



TechTalk Corner:

**Working with Gainful Employment Files For Batch Submittal, .CSV**

*See page 6 for details.*

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certificate.” The law makes an exception for students who have completed a secondary school education in a home school setting that is treated as a home school or private school under State law.

Therefore, students who do not have a high school diploma or a recognized equivalent (e.g., GED), or do not meet the home school requirements, and who first enroll in a program of study on or after July 1, 2012, will not be eligible to receive Title IV student aid. Students will qualify for Title IV student aid under one of the ability-to-benefit (ATB) alternatives if the student was enrolled in a Title IV eligible program prior to July 1, 2012. Those alternatives include the student passing an independently administered, approved ATB test or successfully completing at least six credit hours or 225 clock hours of postsecondary education.

We note that this change does not affect students with intellectual disabilities who are enrolled in approved Comprehensive Transition and Postsecondary Programs. Students who enroll in such programs remain eligible for Title IV assistance from the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant, and Federal Work Study programs even if they do not have a high school diploma or its recognized equivalent.

As noted, the elimination of ATB alternatives to a high school diploma (or recognized equivalent) applies to students who first enroll in a program of study on or after July 1, 2012. Therefore, a student who does not possess a high school diploma, or a recognized equivalent, but who is, or was, enrolled in a Title IV eligible program anytime prior to July 1, 2012, may be eligible to receive Title IV student assistance under the ATB alternatives. We will provide additional guidance on the implementation of this change in a forthcoming communication, including examples of the conditions under which a student who was enrolled prior to July 1, 2012, may establish eligibility under the ATB alternatives.

Finally, the HEA continues to provide that for an institution to qualify as an eligible institution, it may admit as regular students only students with a high school diploma or the recognized equivalent of a high school diploma, or students who are home-schooled or who are beyond the age of compulsory attendance.

**2012-2013 Federal Pell Grant Amounts** - Public Law 112-74 included funds to establish the maximum Federal Pell Grant award for the 2012-2013 Award Year at \$4,860. However, HEA section 401 (b)(7) provides for an automatic increase to the appropriated Federal Pell Grant maximum award for 2012-2013 of \$690, resulting in a 2012-2013 maximum award of \$5,550. 2012-2013 Federal Pell Grant Payment schedules were posted to our Information for Financial Aid Professionals Web site on January 12, 2012.

**Minimum Federal Pell Grant Award and Maximum EFC** - Public Law 112-74 amended HEA section 401(b)(4) to change the minimum Federal Pell Grant award calculation. Specifically, the new law establishes the minimum Federal Pell Grant award for a student at ten percent of the maximum award amount for the award year. In addition, it eliminates the provision that permitted a student who would be eligible to receive a Federal Pell Grant of between five and ten percent of the award year's maximum award to receive an award of ten percent of the maximum award. Therefore, beginning with the 2012-2013 award year, students will not receive a Federal Pell Grant if they are not eligible for at least ten percent of the maximum award for the academic

year. This change in the calculation of the minimum award amount results in 4995 being the maximum EFC enabling a student to be eligible to receive a 2012-2013 Federal Pell Grant.

**Federal Pell Grant Duration of Eligibility** - Public Law 112-74 amended HEA section 401(c)(5) to reduce the duration of a student's eligibility to receive a Federal Pell Grant from 18 semesters (or its equivalent) to 12 semesters (or its equivalent). This provision applies to all Federal Pell Grant eligible students effective with the 2012-13 award year. The calculation of the duration of a student's eligibility will include all years of the student's receipt of Federal Pell Grant funding. This change in the duration of students' Federal Pell Grant eligibility is not limited only to students who received their first Federal Pell Grant on or after the 2008-2009 award year, as the HEA previously provided when the duration of eligibility was 18 semesters.

We will calculate the equivalency by adding together each of the annual percentages of a student's scheduled award that was actually disbursed to the student. For example, a student whose 2011-2012 Federal Pell Grant scheduled award was \$5,550, but who only received \$2,775 because she was only enrolled for one semester, will have used 50% of that award year's scheduled award. Similarly, a student who was enrolled three-quarter time for the entire award year would have used 75% of his scheduled award.

We are currently evaluating the systems changes that will be needed to implement this new provision as well as how best to communicate to impacted students and their schools when the student has reached the 12 semester limit or is close to that limit.

**Grace Period Interest Subsidy** - Public Law 112-74 amended HEA section 428(a)(3)(A)(i)(I) to temporarily eliminate the interest subsidy provided on Direct Subsidized Loans during the six month grace period provided to students when they are no longer enrolled on at least a half-time basis. This change will be effective for new Direct Stafford Loans for which the first disbursement is made on or after July 1, 2012, and before July 1, 2014.

**Calculation of Special Allowance Payments** - Public Law 112-74 amended HEA section 438(b)(2)(I) to change the base on which special allowance payments (SAP) to lenders for Federal Family Education Loans is calculated from Commercial Paper to the London Inter Bank Offered Rate. This calculation change is effective for loans first disbursed on or after January 1, 2000. However, the change only applies if, by April 1, 2012, the loan holder (or the beneficial holder if the loan is held by an eligible lender trustee) provides the Secretary with a signed waiver of all contractual, statutory, and legal rights to a payment based on the SAP formula in place when the loan was made. The Department will develop and provide FFEL Program loan holders with the required waiver format early in 2012.

In the coming weeks, we will provide additional guidance on these issues, including information on changes to our systems and on reporting requirements. We thank you for your continued support to students who benefit from the Federal student aid programs, and for your service to students and their families.

Sincerely,

Eduardo M. Ochoa  
Assistant Secretary  
Office of Postsecondary Education

# STAFFING YOUR OFFICE IN A COMPLEX ENVIRONMENT

By **Duane Quinn**,  
Senior Consultant, HEAG

Having hired a good number of temporary staff members during my career, and now during retirement being one myself, I have come to understand a lot of the positive and negative aspects of working with consultants and staffing agencies. And currently, during times of increased aid applications and budgetary issues, we are all dealing with the need for temporary help more than ever.

For those aid offices that use temporary staff, the best option is calling the seasoned aid professional that has temped in your office for some time. That person knows the routine, the office policies, and the college software. They are ready to start on quick notice; you know the individual's ability to fit in with the other personnel, and you know their ability to perform. It has been a good match in the past and there is no need to change now.

But, when the need for temporary help arises quickly and the seasonal pressures are at their height, how do you meet your office needs when there is no past help to rely on? In cases like this you have two options: recruit a temporary staff member yourself, or turn to a temporary staffing agency.

In my experience, recruitment on your own can be frustrating and time consuming. The position needs to be advertised, often requiring the intervention and approval of the Human Resources office. Since you cannot sort out applicants through advertisement, time is spent in interviews, and in the end there is always the question of the individual's ability to fit into the office routine.

Filling staffing needs through an agency can eliminate a lot of the time and frustration of finding the right individual, at the time when you need it. And time is critical when the aid office is short staffed, whether it is due to resignations, family leave, or simply piles of unread applications.

**1) Be prepared to carefully describe your needs to the agency.** You should be detailed in describing the functions you expect of the temporary staff member. Will she be reviewing applications, will he be dealing directly with parents and students, or will she be mostly concerned with data entry? If the staff member will be involved in your aid management system, describe the system and any institutional modifications that are unique to your office. Describe your expectations for the hourly work day and the specific time frame for which you will need the individual. Are you primarily an FM office or will the individual need to be versed in IM? If you are an IM office, what are the specific IM options used in your need analysis and awarding procedures. These are the types of specifics which are difficult to describe in an advertisement, and issues which can be discussed with an agency and of which an agency should be fully aware.

By a detailed description of your needs, you assist the agency in sorting among their staff for you. The agency is able to review your needs and compare them to the strengths of the personnel they have available to them. The agency is able to narrow down potential temporary staff whom are best able to fill the needs which you have specified. In many cases, an agency can provide you with the precise expertise you are looking for and that you have not been able to find on your own, and at the time when you need it.

**2. An interview with the potential candidate is still an important step**, but the pool is already narrowed to individual(s) who appear to meet your needs. Once a good prospect is identified, an interviewed is still very important since it assesses

if a good chemistry exists between you and the potential consultant. At this time, you should concentrate on confirming that the individual has the skills which you have described, and most importantly will make the correct fit into your office staff. Once you are satisfied, the individual is ready to begin filling your office needs.

**3. The agency has the responsibility of making sure you are happy with the staffing match.** There is beauty in knowing that this relationship you have entered into with this agency and consultant is a business relationship only, which can stop at almost any time with minimal explanation on your part. In the rare occasion where you discover that the selection was not the correct fit for your office, contact the agency to make a replacement. Once again, you have the ability to change staffing without going back through the time consuming interview process, and without the need to work through the human resources department. In addition, you do not have to spend valuable time addressing shortcomings and problems with the consultant directly.

**4. In many cases, the consultant assigned to the school becomes a valuable asset to the financial aid office.** Once a good consultant is identified and trained, they can be asked to return time and time again as the need dictates such as when a vacancy occurs or processing pressures mount. More and more schools now even budget for extra seasonal help to get through the year, and rely on agency support to do this. Hence, more and more financial aid consulting groups and companies are on the scene today working as the partner to the financial aid office.

**5. Hiring through an agency allows the school to work with temporary staff without having to hire them.** Recent changes in employment law require that all schools who work with temporary, consulting help must hire them as an employee and follow their due process for hiring and termination etc. This presents a greater burden on the school who selects to work with seasonal, temporary employees. If working with an agency, the consultant is considered their employee and the school is not involved.

**6. Thanks to the Internet and the electronic age, much of the work in the financial aid office can be done remotely.** Specialized services in almost all aspects of the financial aid office can now be handled remotely if the school is looking to do that. More and more schools are now developing partnerships with agencies or consulting groups to provide them with a processing and staffing solution on a remote basis.

**7. Working with an agency provides the school another level of comfort in that they carry professional liability insurance in the event an error or miscalculation happens.** Most solo and individual consultants do not carry this type of insurance which exposes them to liabilities if they perform an error or if a problem arises. Considering the amount of financial aid dollars that are at stake, having this level of protection can be very important to the school.

Your time is valuable and the need to be fully staffed in crucial periods is essential to meeting enrollment goals. Sometimes a staffing agency can be the best resource to keep your office running happily and efficiently.

*The Higher Education Assistance Group, Inc. is a financial aid/higher education consulting group located in Wellesley, MA. Our website is: [www.heag.us](http://www.heag.us)*

## SPECIAL DIRECT CONSOLIDATION LOAN ONLINE APPLICATION PROCESS

The U.S. Department of Education (the Department) is pleased to announce the application period for the Special Direct Consolidation Loan opportunity the Department will offer to eligible borrowers through the William D. Ford Federal Direct Loan (Direct Loan) Program. On January 17, 2012, the Department implemented the online application for this short-term special consolidation opportunity that will be available to eligible borrowers through June 30, 2012.

The Special Direct Consolidation Loan opportunity will allow certain borrowers who have at least one Direct Loan Program loan or Department-held Federal Family Education Loan (FFEL) Program loan and at least one commercially-held FFEL Program loan to consolidate their eligible commercially-held FFEL Program loans into a Special Direct Consolidation Loan. After a borrower's commercially-held FFEL loans are consolidated, the new Special Direct Consolidation Loan will be serviced together with the borrower's other Department-held loans. The servicing will be done by one federal loan servicer.

Four federal loan servicers - **FedLoan Servicing (PHEAA)**, **Great Lakes Educational Loan Services, Inc.**, **Nelnet**, and **Sallie Mae** - will contact potentially eligible borrowers about the Special Direct Consolidation Loan opportunity offered by the Department. If an entity other than FedLoan Servicing (PHEAA), Great Lakes Educational Loan Services, Inc., Nelnet, or Sallie Mae contacts you about "special consolidation," it will not be in reference to the Special Direct Consolidation Loan opportunity that is being offered by the Department through June 30, 2012.

## COHORT DEFAULT RATES COMING OUT

**February 13, 2012**

By **Katrina Turner**

Director, Operations Performance Division, Federal Student Aid

*Subject: FY 2010 2-Year and FY 2009 3-Year Draft Cohort Default Rates Release Scheduled for February and March 2012*

In the next several weeks, we plan to release Draft Cohort Default Rates to all eligible schools, guaranty agencies, and lenders. This year, we plan to release a 2-year and a 3-year draft cohort default rate as follows:

- On February 27, 2012 we plan to release the FY 2010 2-Year Draft Cohort Default Rates
- On March 5, 2012 we plan to release the FY 2009 3-Year Draft Cohort Default Rates

## NASFAA ANNOUNCES NASFAA UNIVERSITY

By **Beth Ingle**, Vice President of HEAG.

For years, the financial aid community has discussed the need to establish some kind of professional credentials for financial aid administrators. Well, NASFAA has taken the first step in this area.

NASFAA recently announced the launch of NASFAA University, a new learning program for financial aid professionals. NASFAA University will be rolled out during the next few months through multiple learning formats. This five part training program consists of:

- Complete an independent study on specific topics using a self study guide.
- Take an instructor-led online course.
- Demonstrate five or more years of variable work experience (details coming soon)
- Attend a state or regional boot camp that uses the approved NASFAA University curriculum (coming in 2013)
- Receive personal training via NASFAA University On-Site Services (coming in 2012)



After completing this training program, the aid administrator will be allowed to sit for an examination. This program provides a nationally-recognized standard in financial aid training which will give the administrator a professional credential, attesting to their achievement. More information about this program can be found at [www.nasfaa.org](http://www.nasfaa.org).

I think this is a good first step, what do you think?

# VERIFICATION UPDATE

*Summary: This letter provides important information about the Federal Register notice published on July 13, 2011, detailing the FAFSA information that an institution and an applicant may be required to verify for the 2012-2013 award year. This letter also provides a summary of how the verification process will be implemented for the 2012-2013 award year.*

Dear Colleague:

On October 29, 2010, the Secretary published final regulations related to program integrity issues in the Federal Register. Those regulations included changes to the verification requirements for applicants for student financial assistance under the Title IV Higher Education Act (HEA), programs. Recognizing that many institutions needed additional time to modify their processing systems and policies to comply with the revised verification requirements in 34 CFR 668.51 through 34 CFR 668.61, the Secretary delayed the effective date of the final verification regulations until the 2012-2013 award year.

The new regulations include a provision that the Secretary publish a Federal Register notice announcing, for each award year, the Free Application for Federal Student Aid (FAFSA) information that an institution and an applicant may be required to verify for an applicant selected for verification, and the acceptable documentation for that information (see 34 CFR 668.56 and 668.57). On July 13, 2011, the Secretary published the required notice in the Federal Register for the 2012-2013 award year.

## 2012-2013 FAFSA Information to be Verified

The following is a listing, as included in the July 13, 2011 Federal Register notice, of the FAFSA information that may need to be verified for applicants who complete a FAFSA for the 2012-2013 award year. Information is to be verified for the applicant and, if appropriate, his or her parent(s) or spouse.

### Information for All Applicants Selected for Verification

- Number of household members.
  - Verification is not required if the -
    - Applicant is dependent and the applicant's parent's marital status is single, separated, divorced, or widowed, and the family size reported on the FAFSA is two.
    - Applicant is dependent and applicant's parents' marital status is married, and the family size reported on the FAFSA is three.
    - Applicant is independent and the applicant's marital status is single, separated, divorced, or widowed, and the family size reported on the FAFSA is one.
    - Applicant is independent and the applicant's marital status is married, and the family size reported on the FAFSA is two.
- Number of household members enrolled at least half-time in eligible postsecondary institutions.
  - Verification is not required if the number in college reported on the FAFSA is one.
- Food Stamps - Supplemental Nutrition Assistance Program (SNAP) - if receipt is indicated on the 2012-2013 FAFSA.
- Child Support Paid - if reported on the 2012-2013 FAFSA.

### Information for Tax Filers When Applicant Selected for Verification

- Adjusted Gross Income (AGI).
- U.S. income tax paid.
- Untaxed Income - only the following untaxed income if reported on the 2012-2013 FAFSA -
  - Untaxed IRA distributions.
  - Untaxed pensions.
  - Education credits. IRA deductions.
  - Tax exempt interest.

### Information for Non-Tax Filers When Applicant Selected for Verification

- Income earned from work.

### Acceptable Documentation

As required by the regulations, the July 13, 2011, Federal Register notice includes the acceptable documentation for the FAFSA information that may need to be verified for applicants who complete a FAFSA for the 2012-2013 award year. Institutions should carefully review the Federal Register notice to determine what documentation, including information from the IRS Data Retrieval Process, the Secretary has determined is acceptable to meet the verification requirements of the regulations.

### 2012-2013 Verification Selection Process and ISIR Flags

The Department's long-term verification goal is to develop a customized FAFSA information selection approach based on information provided by each applicant when the FAFSA was completed. When fully implemented, this process will identify for a selected applicant only the FAFSA information that requires verification based upon that applicant's data, in contrast to the current process, which requires verification of a single set of items for all applicants selected for verification. However, due to the need for sufficient historical FAFSA data to properly develop the customized verification model, we are not implementing a fully customized verification process for the 2012-2013 award year. Instead, for the 2012-2013 award year, we will implement a variation of the current process, as described below.

For the 2012-2013 award year, data-based statistical analysis will continue to be used to select for verification those applicants with the highest probability of error on their FAFSA submissions. Student Aid Reports (SARs) and Institutional Student Information Reports (ISIRs) will continue to include only one verification flag to indicate if the applicant has been selected for verification. An applicant whose ISIR is so flagged must verify the FAFSA information included in the July 13, 2011, Federal Register notice and summarized earlier in this letter. Note that, as discussed more fully below, information retrieved using the Internal Revenue Service (IRS) Data Retrieval Process and not subsequently changed, is considered acceptable documentation for IRS-related information.

### IRS Data Retrieval Process

Applicants selected for verification who retrieve and transfer their income tax return information using the IRS Data Retrieval Process - either when initially completing the FAFSA using FAFSA on the Web (FOTW) or through the corrections process of FOTW - will be considered to have verified the FAFSA IRS

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information (AGI, taxes paid, and any of the applicable untaxed income items). However, if changes were made to the transferred information or if the institution has reason to believe that the information transferred is inaccurate, the applicant must provide other acceptable documentation as included in the Federal Register notice.

**IRS Tax Return Transcript Required**

Under certain conditions, some applicants who were selected for verification will need to submit to their institution an IRS Tax Return Transcript of 2011 tax year information for the applicant, his or her spouse, and his or her parents, as applicable. These conditions are as follows -

- When the applicant (or parent) did not use the IRS Data Retrieval Process - either at initial FAFSA filing or through the FOTW correction process.
- When information included on the FAFSA using the IRS Data Retrieval Process was subsequently changed.
- When a married independent applicant and spouse filed separate tax returns.
- When the parents of a dependent student filed separate tax returns.
- When an applicant or applicant's parent had a change in marital status after the end of the tax year on December 31, 2011.
- When the applicant, or parent or spouse, as applicable, filed an amended tax return.

While encouraged, IRS Tax Return Transcripts submitted to the institution for verification need not be signed by the tax filer.

See the attachment to this letter for information on the options tax filers may use to request an IRS Tax Return Transcript from the IRS.

In limited circumstances, if an institution determines that obtaining an IRS Tax Return Transcript is not possible, the institution may accept a signed copy of a 2011 income tax return, but it must document the reason for allowing an applicant to do so. One of those limited circumstances is if the applicant or parent or spouse, as applicable, filed a foreign or Puerto Rican tax form.

It is important to communicate to applicants that using the IRS Data Retrieval Process, either when initially completing a FAFSA or by using the corrections functionality of FOTW, provides them with the fastest, easiest, and most secure solution for meeting verification requirements.

With your support, we are confident that the changes to the verification process for the 2012-2013 award year will help to reduce burden on applicants, their families, and on institutions, while also maintaining the integrity of the Title IV federal student aid programs.

Sincerely,

David A. Bergeron  
Deputy Assistant Secretary for  
Policy, Planning, and Innovation  
Office of Postsecondary Education

## APPLICATION AND VERIFICATION GUIDE

**March 2, 2012**

**By Jana Hernandez**

**Service Director, Operations, Federal Student Aid**

*Subject: Application and Verification Guide [2012-2013 Federal Student Aid Handbook]*

We are pleased to announce the availability of the Application and Verification Guide of the 2012-2013 Federal Student Aid Handbook. The Application and Verification Guide is the first installment of the 2012-2013 Federal Student Aid Handbook.

The Federal Student Aid Handbook consists of the Application and Verification Guide and six numbered volumes. Each volume is posted on the Information for Financial Aid Professionals (IFAP) Web site after being reviewed and approved by the appropriate offices in Federal Student Aid and the Office of Postsecondary Education.

Note: Federal Student Aid no longer offers printed copies of the Federal Student Aid Handbook. Schools can download the most recent version of the 2012-2013 Federal Student Aid Handbook at any time from its page on the IFAP Web site.

To access the Application and Verification Guide of the 2012-2013 Federal Student Handbook, click [here](#).

Each time we post a volume of the 2012-2013 Federal Student Handbook, we will inform the community through an Electronic Announcement on the IFAP Web site.

### Contact Information

Questions and suggestions concerning the Federal Student Aid Handbook can be sent to [fsaschoolspubs@ed.gov](mailto:fsaschoolspubs@ed.gov).

## TECH TALK CORNER

# WORKING WITH GAINFUL EMPLOYMENT FILES – FOR BATCH SUBMITTAL, .CSV LAYOUT

James Dergay, HEAG Consultant - 1/10/12

## I. Working with the Gainful Employment (GE) Student Submittal File:

Many of us working at schools offering gainful employment programs have recently completed the first, annual gainful employment; I mean gainful employment (GE) reporting requirements under the new federal regulations. Through trial and error, I learned a number of steps that could be helpful to anyone submitting their gainful employment data by batch file through their school's SAIG TG mailbox.

Once you have logged on to the National Student Loan Database System (NSLDS) professional access website and notified them of your intent to use batch submittal, the first step is to build your student detail records in an Excel spreadsheet according to the layout explained in the "Gainful Employment User Guide", Appendix A, page 33, which can be found on the IFAP website here: <http://ifap.ed.gov/nsldsmaterials/NSLDSGainfulEmploymentUserGuide092211.html>. Name each column of your spreadsheet, left to right, according to the field names in the user guide, the first being, "record type", followed by "award year," so on, and so forth.

At this point you will have gathered the required student data from your school's data base software using a query function (best case) or manually (worst case), and begun using the data to complete the detail records of your gainful employment report. By applying the excel auto-filter to the row of field names you can easily sort and update your detail records. This is especially helpful for school reporting on multiple gainful employment programs, or multiple award years (as was required this year). Always remember to save your work in excel.

Once the detail records are complete, it's time to add the header and trailer records to the report. Adding the header record will require deleting the row of field names, and replacing it with the header record, formatted according to the GE user guide, Appendix A, page 32. In the row beneath your final detail record add the trailer record, the format for which can be found in Appendix A, page 35 of the GE user guide. The content of your report is now complete. In order to submit it through the SAIG mailbox, the report must now be saved in the comma separated value (.CSV) format. Before transmitting your report, view it in Notepad\* in order to make sure there are no formatting errors. If you make changes save the file before closing Notepad. Common mistakes to watch out for include:

### Header Record:

- record type not in the "000" format.
- submittal date not in the "CCYYMMDD" format.
- school OPEI number missing a leading 0.
- no space in the "filler" fields, field codes 801, 804, 807

### Detail Records:

- record type not in the "001" format.
- award year not in the correct format (for example, the award year July 1, 2008 through June 30, 2009 should be formatted as "20082009.")
- social security numbers missing leading zeros.
- dates of birth and/or program dates not in the "CCYYMMDD" format.
- school OPEI number missing a leading 0.
- if program attendance status is "E", program attendance end date not in the "00000000" format.

- if program attendance status is "E", data reported for "private loans amount" and/or "institutional financing amount." These fields should be left blank.
- credential level not in the "00" format.

### Trailer Record:

- record type not in the "999" format.
- detail record count includes the header and trailer records (it shouldn't).
- no space in the "filler" fields, field codes 901, 903, 905

\*Notepad may add unnecessary commas to the ends of the header and trailer records. When viewing the report in Notepad, scroll as far over to the right as possible. If you see commas hiding there delete them.

If there are errors in the header or trailer records, the report will not process. If you do not receive a response file within 24 hours of transmitting your file, you can safely assume that such an error has occurred. Review your header and trailer records again for a formatting mistake. If you are unable to identify any, call the NSLDS customer support center for assistance (800-999-8219, option 4).

## II. Working with a response file

If you receive a gainful employment response file within 24 hours, NSLDS has successfully processed your file. The response file includes a header and trailer record, as well as detail records containing errors that must be corrected. After transmitting your response file, open it in Notepad to view the detail records containing errors. If the response file only contains the header and trailer records, CONGRATULATIONS!/FAT CHANCE! - all of your detail records have successfully processed, and you are done! If it contains detail records, however, it means there are one or more errors in each of the detail records within the response file. By scrolling to the right you will see the error codes for each record in a six digit format such as "000,000". The first three digits refer to the field code containing the error. The last three are the error code itself. Appendix A of the GE user guide includes descriptions of each error code.

To make your corrections, open the response file in a new Excel spreadsheet. The error codes will appear in columns to the right. Format these cells in the "000" format for clarity. Using the GE user guide you can now refer back to the detail records and make all the necessary corrections. Sorting with auto-filter can help with large files. Once you have made all your corrections, delete the columns containing the error codes and save your document as a .CSV file. In effect, you have created a new student submittal file. Prior to submission, be sure to follow all the formatting guidelines for the student submittal file, and the tips from part I above. Pay special attention to the header record, as the one you received in the response file is different from the one you return in a submittal file: the file name must equal "GE STUDENT SUBMITTAL," and file type must be ".S." The process of submittal and response will be repeated until all your records have been successfully processed, and you have completed your gainful employment reporting for the year.

This new regulation represents a new responsibility, and more work, for many financial aid offices and staff. As with anything else, the best way to successfully administer this new responsibility is to roll up your sleeves and do the work. I hope you'll let us know if these tips are helpful, as well as share any of your own. What have you learned? Is anyone working in formats other than the one covered here?

## HEAG POSITIONS AVAILABLE

### Financial Aid Consultant

The Higher Education Assistance Group, Inc. (HEAG) is accepting resumes for part-time and full-time, salaried and non-salaried financial aid consultants to work with our school clients located in Massachusetts and throughout the country. All levels of positions available. We are looking for financial aid administrators with at least five years of professional experience with file review, verification, Direct Loan and all other related administrative duties. Candidates with strong Banner, Datatel and/or PowerFAIDS experience a plus. Work can be short term and long term, onsite and remote, structure on an assignment basis. HEAG is a comprehensive financial aid consulting group located in Wellesley, MA. Please send cover letter and resume to Beth Ingle, Vice President, HEAG, [bingle@heag.us](mailto:bingle@heag.us).



### Systems Analyst/Financial Aid Consultant

The Higher Education Assistance Group, Inc (HEAG) is seeking a qualified candidate for the position of a full-time, salaried Systems Analyst/Financial Aid Consultant. This position will provide functional financial aid and university based software support to schools. Experience preferred in any or all of the following applications: SunGard Banner, PowerFAIDS, PeopleSoft, DOE software and/or similar applications, in addition to strong knowledge of financial aid processing as well as a technical understanding of automating financial aid processes. The successful candidate will have excellent communication skills including a demonstrated ability to communicate well with both technical and non-technical staff. Qualified candidates should understand that this position requires some travel. This position also offers the candidate the opportunity for compensation based on initiative and success in a challenging but fun environment. Please send cover letter and resume to Beth Ingle, Vice President, HEAG, [bingle@heag.us](mailto:bingle@heag.us).



### *About The Higher Education Assistance Group*

The Higher Education Assistance Group Inc., (HEAG) is a comprehensive higher education and financial aid consulting group located in Wellesley, MA. In operation since 1989, we work with for-profit, public and private institutions across the country.

HEAG's highly qualified team of consultants has spent decades in the field providing administrators with the tools, knowledge and support necessary to complete institutional objectives. We pride ourselves on assisting post secondary institutions to meet challenges such as program regulatory compliance, organizational structure, staffing, and technological support.