

4.4 New Data Adjustment

What is a new data adjustment?

A new data adjustment allows a school to challenge the accuracy of “new data” included in the school’s most recent official cohort default rate.

New Data Adjustment Timeframe		
Draft Cycle	Not applicable	
Official Cycle	School receives official cohort default rate notification package	<i>September</i>
	School sends New Data Adjustment allegations to Data Manager with cc to Default Prevention and Management (DPM)	<i>Within 15 days of timeframe begin date</i>
	Data Manager sends New Data Adjustment response to school with cc to DPM	<i>Within 20 days of receipt of school’s New Data Adjustment allegations</i>
	If necessary, school requests clarification.	<i>Within 15 days of receipt of Data Manager response</i>
	Data Manager sends requested information to school	<i>Within 20 days of receipt of school’s clarification on request</i>
	School sends completed New Data Adjustment to DPM <i>If the school is also filing an Erroneous Data Appeal and/or a Loan Servicing Appeal, it may submit them together, by the date that the latest is due.</i>	<i>Within 30 days of receipt of final Data Manager response</i>

For domestic schools the “timeframe begin date” is the sixth business day after the cohort default rates are released as officially announced on the IFAP website: <http://ifap.ed.gov>.

For foreign schools the “timeframe begin date” is the day after the date of receipt of the official cohort default rate notification package.

What is new data?

New data occurs when loan data reported to the National Student Loan Data System (NSLDS) changes during the period between the calculation of the draft and official cohort default rates. NSLDS is continuously provided with new or updated information. Because the draft cohort default rates are calculated approximately six months before the official cohort default rates are

calculated, the data used to calculate the draft cohort default rates may be different from the data used to calculate the official cohort default rates.

New data can be identified by comparing the loan record detail reports (LRDRs) for the draft and official cohort default rates for the same cohort fiscal year and determining if any loan data is newly included, excluded, or changed in any manner. The school should then determine if the new data results in the loan data being reported incorrectly.

The following are examples of new data:

- ◆ a loan on the LRDR for the official cohort default rates is newly included, excluded, or changed in some manner when compared to the LRDR for the draft cohort default rates, and
- ◆ the school believes the loan is being incorrectly used in the official cohort default rate calculation.

If the loan data is reported in the same manner in the LRDR for the draft and official cohort default rates, the school may not submit a new data adjustment.

If a school does not submit a new data adjustment after the release of the official cohort default rates, the school will not have the opportunity to submit a new data adjustment at a later time.

What benefit will a school gain from submitting a new data adjustment?

If, as a result of a new data adjustment (or as the result of a school's submission of any adjustment or appeal), DPM determines that a school's official cohort default rate data is incorrect, DPM will recalculate the cohort default rate using the corrected data. This may lower, raise, or not affect the cohort default rate. If the school is subject to sanction and the cohort default rate is lowered below the sanction level, the school is no longer subject to that sanction. In addition, a school that would otherwise be subject to sanction in a later year may avoid being subject to that sanction.

However, even though DPM may revise a cohort default rate, subsequent copies of the LRDR for the official cohort default rates will not reflect the change. Therefore, it is important for a school to keep a copy of DPM's final determination letter as the official record of the school's revised cohort default rate.

What roles do the Department and data managers have in a school's new data adjustment?

A data manager is required to review a school's new data adjustment allegations if the new data adjustment allegations are submitted in a timely manner and the data manager has responsibility for the loans. If a school submits new data adjustment allegations to the wrong entity, the new data adjustment allegations will not be reviewed and the school could miss the deadline. The guarantor/servicer code on the LRDR identifies the data manager for a loan. See Chapter 2.3, "Reviewing The Loan Record Detail Report," for information on determining the data manager for a loan.

The data manager must respond to the school's new data adjustment allegations within 20 calendar days of receipt. However, the data manager must not review new data adjustment allegations if the school did not send the new data adjustment allegations within the 15-calendar-day timeframe. If the data manager does not respond within 20 calendar days, the school should advise DPM in writing of the delay.

The Department has two roles in the new data adjustment process. The primary role is to review a school's new data adjustment, which is submitted to DPM once the school has received confirmation from the data manager that a change to the data is warranted. If the data manager indicates that a change is not warranted, the school cannot submit those new data adjustment allegations to DPM as a part of a new data adjustment. If DPM determines that the data manager correctly agreed that changes are warranted to the new data identified by the school, DPM will recalculate the school's cohort default rate based on the correct data and notify the school.

The Department's other role is to respond to a school's new data adjustment allegations if the Department is the data manager for the loans. The Department is the data manager for FFELs the Department holds and for all Direct Loans.

DPM is responsible for responding to a school's new data adjustment allegations for FFELs that the Department holds. These loans are identified in the LRDR with a guarantor/ servicer code of 555, 627, or 631.

The Department's Direct Loan servicer is responsible for responding to a school's new data adjustment allegations regarding all Direct Loans, even those that are in default. These loans are identified in the LRDR with a guarantor/servicer code of 0101.

How does a school submit new data adjustment allegations to a data manager?

Timing is critical when submitting a new data adjustment. A school begins the process by submitting new data adjustment allegations to the data manager responsible for a loan within 15 calendar days of the timeframe begin date. Chapter 3.1, "Reviewing Rates and Loan Data," outlines a method a school can follow to determine if the LRDR contains inaccurate data.

Upon receiving the LRDR for the official cohort default rates, a school should compare the LRDRs for the draft and official cohort default rates to determine if any loan data has changed between the LRDRs, and, if so, whether the changes result in the loan being reported incorrectly. If the school believes the LRDR for the official cohort default rate contains new and inaccurate data, it should submit a new data adjustment.

A school that is subject to sanction should not submit a new data adjustment. Rather, a school subject to sanction should submit an erroneous data appeal because the school can appeal a data manager's adverse ruling on an erroneous data appeal to DPM.

A school must list separate new data adjustment allegations for each loan record that the school believes contains incorrect new data. If one data

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For foreign schools the "timeframe begin date" is the day after the date of receipt of the official cohort default rate notification package.

DPM recommends that a school send all correspondence return receipt requested or via commercial overnight mail/courier delivery. This will be useful to a school if it is asked to authenticate the timeliness of its submission. A school should maintain the documentation which verifies the receipt of the materials as well as all electronic and hardcopy documentation submitted as a part of the new data adjustment process.

manager is responsible for all the loans, the school must list all the allegations in one submission. However, if there are multiple data managers involved, the school must submit separate new data adjustment allegations to each data manager. For example, a school believes the LRDR contains three loans with new data. Two of the loans are held by one data manager; the other loan is held by a different data manager. The school must prepare two separate new data adjustment allegations packages, one for each data manager, listing only the loans held by each data manager.

The materials must include the following items:

- ◆ A new data adjustment allegations spreadsheet that lists the incorrect new data reflected on the LRDR.
- ◆ Copies of the appropriate pages from the relevant LRDR to demonstrate that the loans are new data (see Chapter 3.1, “Reviewing Rates and Loan Data” for examples of the LRDR pages a school should submit).
- ◆ Copies of relevant supporting documentation (see Chapter 3.1 “Reviewing Rates and Loan Data” for examples of other supporting documentation).
- ◆ A letter on the school’s letterhead (see sample letter at end of chapter).

New Data Adjustment Spreadsheet — School to Data Manager

Type: New Data Adjustment
 Cohort FY: 2004
 From: Coralville College
 Code: 098998
 To: State Guaranty Agency
 Code: 111

Number of Borrowers: 2
 Number of Loans: 3

	A	B	C	D	E	F	G	H	I	J	K
	Borrower's SSN	Borrower's Name	Type of Loans	Number of Loans	Earlier of LDA or LTH	Date Entered Repayment	CPD, DD, ICRD, or N/A	Cohort FY(s)	Effect on Calculation	Comments	Agree/Disagree
1											
2	888-88-8888	Loman, Tom	SF	1	07/15/2003	01/16/2004	N/A	FY2004	+D	N/A	N/A
3	999-99-9999	Petrie, Kristy	SF	2	05/17/2001	11/18/2002	09/15/2004	FY 2004 FY 2003	-B +D	N/A	N/A
4											

Date 10/17/2006

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A blank version of this spreadsheet is posted on the Default Prevention & Management website at <http://www.ifap.ed.gov/DefaultManagement/DefaultManagement.html>

The school must send a copy of the letter and the new data adjustment allegations spreadsheet to DPM at the same time it sends the new data adjustment allegations package to the data manager. The school does not need to send the pages of the LRDR or the relevant supporting documentation to DPM at that time unless the school is making new data adjustment allegations about a FFEL that the Department holds.

If a school does not meet the 15-calendar-day timeframe for submitting new data adjustment allegations to both the data manager and DPM, the new data adjustment allegations will not be reviewed.

How does a data manager respond to a school's new data adjustment allegations?

Timing is critical when responding to a school's new data adjustment allegations. A data manager is required to respond to a school's timely submitted new data adjustment allegations for those loans for which the entity is the data manager and send a copy of the response to DPM. However, the data manager must not review new data adjustment allegations if the 15-calendar-day timeframe for a school to submit new data adjustment allegations has expired. If the school's due date falls on a weekend or a federal holiday, a school may send its new data adjustment allegations to the data manager no later than the next federal business day.

Before denying a school's new data adjustment allegations on the basis of a late submission, a data manager should verify the actual date the school received its official cohort default rate notification package from DPM. If the school did not submit the new data adjustment allegations in a timely manner, the data manager must not review any part of the submission. In its response to the school, the data manager should explain that it is unable to review the new data adjustment allegations because the school missed the regulatory deadline. The data manager must also send a copy of the response to DPM.

The data manager must respond to timely submitted new data adjustment allegations within 20 calendar days of receiving the submission. In its new data adjustment allegations response, the data manager will address each of the school's timely submitted new data adjustment allegations. If the data manager does not respond within 20 calendar days, the school should advise DPM in writing of the delay.

If the new data adjustment submission is timely, a data manager must review each new data adjustment allegation submitted by the school. The data manager should determine the following:

- ◆ *The data manager should determine if the new data adjustment allegations presented by the school are based on loans that the data manager currently holds.*

If the data manager does not hold the loans, the data manager should notify the school and DPM that the new data adjustment allegations must be submitted to the appropriate data manager and remind the school that the new data adjustment allegations must be submitted to the appropriate data manager within 15 calendar days of the timeframe begin date.

There will be some instances where the data manager was the former holder of the loans but those loans have been assigned to the Department and the LRDR for the official cohort default rates does not yet reflect the assignment. In that event, the data manager should send the school and DPM a notice stating that the loans have been assigned to the Department. The school then has until 15 calendar days after

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For foreign schools the "timeframe begin date" is the day after the date of receipt of the official cohort default rate notification package.

receipt of the letter from the data manager to submit the new data adjustment allegations to DPM.

- ◆ *The data manager should determine if all relevant material is present.*

See the section of this chapter entitled “How does a school submit new data adjustment allegations to a data manager?” for information on the materials a school is required to submit with its incorrect data challenge. If a school fails to provide the data manager with all of the necessary information, the data manager must ask the school to submit the missing information. However, the school must submit this additional information to the data manager within the initial 15-calendar-day deadline for submitting new data adjustment allegations. If the school does not submit the additional information within the deadline, the data manager must not review the new data adjustment allegation.

- ◆ *The data manager should determine if its documentation supports or refutes each of the new data adjustment allegations listed on the school's spreadsheet.*

The data manager should agree with the school if the data manager's documentation supports the school's claim or if the school has demonstrated that the data manager has failed to take into account correct information the school timely sent to the data manager or NSLDS.

The data manager should disagree with the school if the data manager's documentation refutes the school's claim or if the school failed to demonstrate that the correct information was timely submitted to the data manager or NSLDS. The data manager must explain to the school why it disagrees with the school and send the school a copy of the data manager's supporting documentation. The data manager must send a copy of the response and the supporting documentation to DPM.

After making its determinations, the data manager must compile a list of the data manager's responses to the school's list of new data adjustment allegations. The data manager must record the responses to each of the new data adjustment allegations on a new data adjustment allegations response spreadsheet and provide comments on why the data manager agrees or disagrees with each of the school's new data adjustment allegations. If the data manager agrees that a change should be made, it must correct the data in its internal data system and in NSLDS. Before the release of the draft cohort default rates, the data manager must ensure that the changes they agreed to make were successfully loaded into NSLDS. The data manager should check the NSLDS error report.

The data manager must provide supporting documentation if the data manager disagrees with the school's new data adjustment allegations. In addition, if the data manager's response indicates that a loan has been repurchased, the data manager should provide the original claim paid date,

the repurchase date, the reason the loan was repurchased, and the default date if any subsequent claim was filed.

The data manager new data adjustment allegations response should include the following:

- ◆ A spreadsheet of the data manager’s responses to the school’s list of new data adjustment allegations (see sample spreadsheet below).
- ◆ Copies of supporting documentation for each new data adjustment allegation with which the data manager disagreed.
- ◆ A letter on the data manager’s letterhead with the school’s name and OPE ID number (see sample letter at the end of this chapter).

New Data Adjustment Spreadsheet – Data Manager to School

Type: New Data Adjustment
 Cohort FY: 2004
 From: Coralville College
 Code: 098998
 To: State Guaranty Agency
 Code: 111

Number of Borrowers: 2
 Number of Loans: 3

	A	B	C	D	E	F	G	H	I	J	K
	Borrower's SSN	Borrower's Name	Type of Loans	Number of Loans	Earlier of LDA or LTH	Date Entered Repayment	CPD, DD, ICRD, or N/A	Cohort FY(s)	Effect on Calculation	Comments	Agree/ Disagree
1											
2	888-88-8888	Loman, Tom	SF	1	07/15/2003	01/16/2004	N/A	FY2004	+D	School submitted enrollment status change on 07/31/2004	Agree
3	999-99-9999	Petrie, Kristy	SF	2	4/12/2003	10/13/2004	08/15/2004	FY 2004	No change	School submitted enrollment status change on 02/20/2004; untimely	Disagree
4											

Date 10/31/2006

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The data manager must send its new data adjustment allegations response within 20 calendar days of receiving the new data adjustment allegations from the school. The data manager sends its new data adjustment allegations response to the school and a copy of the new data adjustment allegations response to DPM.

If a data manager is unable to respond within 20 calendar days of receiving the school’s new data adjustment allegations, it should send the school a letter on its official letterhead explaining the circumstances causing the delay, telling the school when it will respond, and indicating that DPM has been informed of the delay.

If a data manager can respond to only a portion of a school's new data adjustment allegations within 20 calendar days, it should hold that portion of the response until it can provide a response to all of the school's new data adjustment allegations. The data manager should send a letter to the school and DPM that provides the information outlined above.

How a data manager submits a copy of the new data adjustment allegations response to the Department

DPM recommends that a data manager send all correspondence return receipt requested or via commercial overnight mail/courier delivery. This will be useful to a data manager if it is asked to authenticate the timeliness of its response. A data manager should maintain the documentation that verifies the receipt of the new data adjustment allegations response as well as all other electronic and hardcopy documentation submitted as a part of the new data adjustment process.

The data manager can use this information when submitting monthly status reports to DPM. For additional information on monthly status reports, see Chapter 3.3, "Data Manager Strategies and Reports."

If sending by courier:

U.S. Department of Education
Default Prevention and Management
Union Center Plaza 084F
830 1st Street, NE
Washington, DC 20002

If sending by U.S. Postal Service:

U.S. Department of Education
Default Prevention and Management
Union Center Plaza 084F
400 Maryland Avenue, SW
Washington, DC 20202-5353

Do not send materials to any other address at the Department

What does a school do with the data manager's new data adjustment allegations response?

Timing is critical after receiving a data manager's new data adjustment allegations response. In those cases where the data manager's new data adjustment allegations response is unclear, incorrect, missing, or incomplete, the school may submit a request to the data manager for a clarification. The school must submit the request to the data manager within 15 calendar days of the receipt of the new data adjustment allegations response. The school should also send a copy of the inquiry letter to DPM. The data manager must respond to the school's inquiry within 20 calendar days of receiving the inquiry and send a copy of the response to DPM. A school cannot appeal a data manager's new data adjustment allegations response to DPM.

Within 30 calendar days of receiving the last response to all of the school's new data adjustment allegations, the school must decide how to proceed and prepare a response to DPM accordingly. If the response indicates that there is no incorrect new data in the school's official cohort default rate calculation, the school can proceed no further and must then notify DPM that the school is withdrawing the new data adjustment.

If the data manager agrees with any of the school's new data adjustment allegations, the school should submit a new data adjustment to DPM. Only DPM can make the recommended changes to the school's cohort default rate.

If the school continues with the new data adjustment, it must submit a new data adjustment to DPM within 30 calendar days of receiving the last response to the school's new data adjustment allegations with the following exception: If the school is submitting the new data adjustment to DPM along with a timely erroneous data appeal and/or a timely loan servicing appeal, the school may submit all materials within 30 calendar days of the later of—

- ◆ receipt of the last response to all of the school's new data adjustment allegations,
- ◆ receipt of the last response to all of the school's erroneous data appeal allegations, or
- ◆ receipt of the last response to all of the school's requests for loan servicing records.

If the school does not submit the new data adjustment in a timely manner, DPM will not review the new data adjustment.

The school must submit to DPM the following:

- ◆ A spreadsheet that lists the new data adjustment allegations with which the data manager agreed (see sample spreadsheet below).
- ◆ Copies of the data manager new data adjustment allegations responses confirming that a change is warranted.
- ◆ A letter on the school's letterhead (see sample letter at the end of this chapter).

New Data Adjustment Spreadsheet — School to DPM

Type: New Data Adjustment
 Cohort FY: 2004
 From: Coralville College
 Code: 098998
 To: DPM
 Code: N/A

Number of Borrowers: 1
 Number of Loans: 1

	A	B	C	D	E	F
	Borrower's SSN	Borrower's Name	Type of Loans	Number of Loans	Date Data Manager Agreed	Data Manager Code
1						
2	888-88-8888	Loman, Tom	SF	1	10/31/2006	111
3						
4						

Date 11/15/2006

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How a school submits a new data adjustment to DPM

DPM recommends that a school send all correspondence return receipt requested or via commercial overnight mail/courier delivery. This will be useful if the school is asked to authenticate the timeliness of its response. The school should maintain the documentation that verifies the receipt of the new data adjustment as well as all other electronic and hardcopy documentation submitted as a part of the new data adjustment process.

If a school does not meet the 30-calendar-day timeframe for submitting a new data adjustment, the adjustment will not be reviewed.

If sending by courier:

U.S. Department of Education
Default Prevention and Management
Union Center Plaza 084F
830 1st Street, NE
Washington, DC 20002

If sending by U.S. Postal Service:

U.S. Department of Education
Default Prevention and Management
Union Center Plaza 084F
400 Maryland Avenue, SW
Washington, DC 20202-5353

Do not send materials to any other address at the Department

What happens after the school submits the new data adjustment?

DPM will review only the information submitted with the new data adjustment and will not review information submitted after the deadline. DPM will send the school and each involved data manager written notification of DPM's decision. The data manager must ensure that NSLDS is correctly updated. The data manager must also ensure that its internal records are correctly updated. DPM's decision is final and no further administrative review is provided.

If DPM determines, using the standard of review described in 34 CFR 668.189(f), that a school's cohort default calculation data is incorrect, DPM will recalculate the cohort default rate based on the corrected data.

If the school was notified that it was subject to sanction and the new data adjustment is successful and the revised cohort default rate is below the sanction level, DPM will withdraw that sanction notice. If the school was notified that it was subject to sanction and the new data adjustment is unsuccessful (or if the new data adjustment is successful but the revised cohort default rate remains above the sanction level), and the school has no other outstanding adjustments or appeals, DPM will notify the school of the effective date of that sanction.

A school that submits an adjustment and/or an appeal but fails to avoid sanctions is liable for certain costs associated with the FFELs it certified and delivered and/or the Direct Loans it originated and disbursed during the adjustment and appeal process. Liabilities are not calculated for loans that were delivered or disbursed more than 45 calendar days after the school submitted its completed adjustment and/or appeal to the Department. Schools may avoid this liability if they choose not to certify or originate loans during the adjustment and appeal process.

**Sample Letter #1:
New Data Adjustment Allegations Letter
School to Data Manager**

Coralville College

5029 Greta Avenue
Coral City, Iowa 12345-5029
1-987-654-3211

October 17, 2006

ATTN: Lesa Neiers
Compliance Officer
State Guaranty Agency
132 Ocean Front Road
Black Diamond Bay, Nebraska 13213-0132

OPEID 098998

Subject: Cohort FY 2004 New Data Adjustment Allegations

Dear Ms. Neiers:

Coralville College, OPE ID 098998, is submitting a list of new data adjustment allegations for the cohort FY 2004 for review by State Guaranty Agency. Please see the enclosed spreadsheet, relevant pages from the loan record detail report for the draft and official cohort default rates, and supporting documentation.

I, the undersigned, certify under penalty of perjury that all information submitted in support of this new data adjustment is true and correct.

Thank you for your consideration.

Sincerely,

Serena Rooney
President, Coralville College

Enclosures

cc: U. S. Department of Education,
Default Prevention and Management

The letter must include the school's OPE ID number, a statement indicating that the school is submitting new data adjustment allegations, and the cohort fiscal year to which the new data adjustment allegations apply. The letter must feature a subject line that reads "Subject: Cohort FY [insert cohort fiscal year being used in the new data adjustment] New Data Adjustment Allegations". The letter must also include a certification sentence that the information provided is true and correct under penalty of perjury and a notation that the school is sending a copy of the letter and the spreadsheet to DPM. The school's President/CEO/Owner must sign the letter, and the signature must be followed by a signature block showing the signer's name and job title.

**Sample Letter #2:
New Data Adjustment Allegations Response
Data Manager to School**

**State Guaranty
Agency**

132 Ocean Front Road
Black Diamond Bay, Nebraska 13213-0132

October 31, 2006
Serena Rooney
President
Coralville College
5029 Greta Avenue
Coral City, Iowa 12345-5029

OPE ID 098998

Subject: Cohort FY 2004 New Data Adjustment Allegations Response

Dear Ms. Rooney:

This is State Guaranty Agency's response to the cohort FY 2004 new data adjustment allegations Coralville College, OPE ID 098998, submitted on October 17, 2006. Please see the enclosed spreadsheet.

For each "Agree" in the "Agree/Disagree" column of the spreadsheet we will update the National Student Loan Data System (NSLDS) and our internal records. You should submit the allegation to DPM.

For each "Disagree" in the "Agree/Disagree" column of the spreadsheet we have reviewed our records and determined that they do not support the allegation. We have included a comment stating our position and attached copies of the documentation supporting our position. We will not make a change to NSLDS or to our internal records.

Sincerely,

Lesa Neiers
Compliance Officer

Enclosures

cc: U. S. Department of Education
Default Prevention and Management

The letter must indicate that the data manager is responding to the school's new data adjustment allegations and include the cohort fiscal year to which the response applies. The letter must feature a subject line that reads "Subject: Cohort FY [insert cohort fiscal year being used in the new data adjustment] New Data Adjustment Allegations Response." The letter must also include a statement that a copy of the new data adjustment allegations response has been sent to DPM.

The responsible data manager official must sign the letter, and the signature must be followed by a signature block showing the signer's name and job title.

Sample Letter #3: New Data Adjustment Letter School to DPM



November 15, 2006
U.S. Department of Education
Default Prevention and Management
Union Center Plaza 084F
400 Maryland Avenue, SW
Washington, DC 20202-5353

OPE ID 098998

Subject: Cohort FY 2004 New Data Adjustment

To Whom It May Concern:

Coralville College, OPE ID 098998, is requesting a new data adjustment to its cohort FY 2004 official cohort default rate. Please see the enclosed spreadsheet and copies of data manager new data adjustment allegation responses for those new data adjustment allegations with which the data managers agreed.

I, the undersigned, certify under penalty of perjury that all information submitted in support of this new data adjustment is true and correct.

Coralville College is not submitting any other adjustments or appeals to DPM.

Thank you for your consideration.

Sincerely,

Serena Rooney
President, Coralville College

Enclosures

cc: State Guaranty Agency

The letter must include the school's OPE ID number, a statement indicating that the school is submitting a new data adjustment, and the cohort fiscal year to which the new data adjustment applies. The letter must feature a subject line that reads "Subject: Cohort FY [insert cohort fiscal year being used in the new data adjustment] New Data Adjustment." The letter must also include a certification that the information provided is true and correct under penalty of perjury, a list of any other adjustments or appeals the school intends to submit to DPM, and a notation that the school is sending a copy of the letter and the spreadsheet to the data manager(s).

The school's President/CEO/Owner must sign the letter, and the signature must be followed by a signature block showing the signer's name and job title.

New Data Adjustment Checklists

School to Data Manager

Determine

- Does the loan record detail report for the official cohort default rate contain new data?

Submit to Data Manager

- Spreadsheet
- Relevant Pages of Loan Record Detail Report
- Supporting Documentation
- Letter

Data Manager to School

Determine

- Was the school submission timely?
- Does the data manager hold the loans?
- Is all the material present?
- Does the data manager agree or disagree with the school?

Response to School

- Spreadsheet
- Supporting Documentation
- Letter

Follow-Up

- Send copy of response to DPM
- Update NSLDS and internal records
- Send monthly status report to DPM

School to DPM

Determine

- ❑ Did the data manager agree with any of the new data adjustment allegations?
- ❑ Does the school have outstanding erroneous data appeal allegations or outstanding requests for loan servicing records?

Submit to DPM

- ❑ Withdrawal Notice

OR

- ❑ Spreadsheet
- ❑ Copy of Data Manager New Data Adjustment Response
- ❑ Letter