Why should a data manager review this chapter?

Data managers should review this Guide for information regarding cohort default rates. This chapter contains basic strategies to prepare a data manager for the release of the cohort default rates as well as strategies to help a data manager process challenges, adjustments, and appeals.

What strategies can a data manager employ before the release of the draft and official cohort default rates?

There are a number of strategies a data manager can employ before the release of the draft and official cohort default rates:

♦ determine data manager staff responsible for processing all cohort default rate challenges, adjustments, and appeals;

♦ establish school and Department cohort default rate contacts within the data manager organization and provide updates to schools and Default Prevention and Management (DPM) when those contacts change;

♦ notify DPM if data manager address or corporate structure changes;

♦ identify staff responsible for enrollment changes;

♦ keep copies of all relevant correspondence between the data manager and schools, lenders, and the Department;

♦ timely submit, in accordance with Department regulations, changes in a borrower's loan information to the National Student Loan Data System (NSLDS) and print NSLDS screen to show acceptance of data manager changes;

♦ develop a plan to assist schools that enhances understanding of what reports and information a school can obtain from the data manager and describes how a school can correct the information; and

♦ use this Guide as a reference when discussing cohort default rate matters with schools.

A data manager may wish to develop a checklist, specific to the data manager's needs, of the activities the data manager needs to do before, during, and after the release of the draft and official cohort default rates.

A data manager should also begin preparations for the release of the cohort default rates. A data manager should prepare and send monthly status reports to DPM. Further, there are a number of spreadsheets and letters used in each challenge, adjustment, and appeal. See the individual challenge, adjustment, and appeal chapters in Part IV for information on these spreadsheets and letters and how a data manager uses them. If a data manager has not previously created electronic copies of the various spreadsheets and letters it should do so before the release of the cohort default rates. If a data manager

A data manager should prepare and send monthly status reports to DPM.

Blank versions of all spreadsheet are posted on the Default Prevention & Management website at http://www.ifap.ed.gov/DefaultManagement/DefaultManagement.html.

has already created electronic copies of the various spreadsheets and letters, it should locate those electronic copies and verify that they are ready for use.

What strategies can a data manager employ to help process challenges, adjustments, and appeals?

There are a number of things a data manager should do as part of the challenge, adjustment, and appeal process.

- ♦ A data manager should date stamp school challenge, adjustment, or appeal submissions when the submissions are received. The data manager response time frames begin when the package is first received by the data manager. Therefore, a data manager may wish to keep the package for proof of the receipt date until the challenge, adjustment, or appeal process is finished.

- ♦ A data manager should check the date a school received its cohort default rate notification package on the electronic file sent by DPM to determine if the school is timely in its submission. If the date is not listed on the report, or if the file cannot be opened, the data manager should contact DPM for the date.

- ♦ A data manager should contact DPM to discuss eligibility issues if the data manager receives any adjustments or appeals from a school on the Department's sanction list. When the official cohort default rates are released, the sanction list is made available online under "Default Management" on the IFAP Web site (ifap.ed.gov).

- ♦ A data manager should review prior challenge, adjustment, and/or appeal responses if the data manager believes the school is attempting to submit a challenge, adjustment, or appeal for a borrower who was addressed in a previous challenge, adjustment, or appeal.

- ♦ A data manager should contact a school as soon as possible if the school does not include all the appropriate challenge, adjustment, or appeal materials.

- ♦ A data manager should make sure comments are entered in the comment column of the spreadsheets, particularly if the data manager disagrees with the school. The data manager should make sure the comment is clear and that supporting documentation is attached to the spreadsheet. The data manager may use abbreviations as long as the data manager provides a list of those abbreviations.

- ♦ A data manager should contact DPM if assistance is needed to make a determination on a school's data, supporting documentation, or other information submitted as part of the challenge, adjustment, or appeal process.

- A data manager should send copies of its challenge, adjustment, or appeal responses to DPM as the responses are processed. The data manager should not wait to send all the copies as one batch.

- A data manager should send all cohort default rate correspondence to all entities via certified mail or commercial delivery and maintain the documentation that shows the correspondence was timely sent. This information will be sent to DPM as part of the monthly status report.

- A data manager should inform schools and DPM if the data manager is unable to comply with time frames due to the data manager's workload.

What should a data manager do if it receives an incorrect submission from a school?

A data manager should contact a school as soon as possible if a school incorrectly asks for guidance about or submits an uncorrected data adjustment, participation rate index challenge, economically disadvantaged appeal, participation rate index appeal, average rates appeal, or thirty-or-fewer borrowers appeal to the data manager. The data manager should inform the school that the materials or question must be submitted to DPM within the appropriate time frame. The data manager must also inform DPM of the incorrect submission.

If the data manager receives a challenge, adjustment, or appeal but the data manager does not hold the loans, the data manager should notify the school and DPM that the challenge, adjustment, or appeal must be submitted to the appropriate data manager and remind the school that the challenge, adjustment, or appeal must be submitted to the appropriate data manager within the appropriate time frame.

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 loan record detail report 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 data manager should instruct schools to send the request to DPM within 15 calendar days of receipt of the data manager's letter.

What should a data manager do if the school's challenge, adjustment, or appeal is successful?

A data manager must ensure that the data is successfully entered into NSLDS.

After a school's successful incorrect data challenge, the data manager must update NSLDS and the data manager's internal records with the new information prior to the calculation of the next official cohort default rates. The data manager must also submit to NSLDS any subsequent incorrect data challenge changes submitted to the data manager by DPM.

After a data manager is informed by DPM that a school's new data adjustment, uncorrected data adjustment, or erroneous data appeal was successful, the data manager must update NSLDS and the data manager's internal records

with the new information prior to the calculation of the next draft cohort default rates.

A data manager must ensure that the data is successfully entered into NSLDS. A data manager should review the NSLDS error report. Contact NSLDS Customer Service at 1-800-999-8219 for submission assistance.

How does a data manager keep the Department informed about its cohort default rate actions?

Data managers send monthly reports (see the following example) to DPM listing the status of all cohort default rate related requests the data manager has received. The monthly status report is a cumulative list of requests that data managers receive from schools after the release of the draft cohort default rates or the official cohort default rates. This process minimizes the need for DPM to contact a data manager. These status reports will assist DPM in monitoring the time frames associated with the cohort default rate process. The monthly status reports should be sent to DPM within seven calendar days after the end of each month.

If the data manager does not receive any requests from schools, it should submit a blank monthly status report to DPM indicating that it has not received any requests. If the data manager does not review a response because of an untimely submission, the data manager should note this on the monthly status report.

A data manager should not submit copies of its responses to schools to DPM with its monthly report. Copies of these responses should be sent to DPM at the same time the data manager sends the response to the school. Once the data manager has responded to all of the requests received, and the data manager has not received any subsequent requests, the data manager should send DPM an updated status report marked "FINAL." After the data manager sends DPM the final report, the data manager does not send any more monthly status reports until the next cohort default rates are released.

📰 Monthly Status Report Spreadsheet - Example

Type: Monthly Status Report **Month and Year: March 2006**

Cohort FY: Draft 2004 **Number of Schools: 1**

From: State Guaranty Agency

Data Manager Code: 111

To: Default Prevention and Management

	A	B	C	D	E	F	G	H	I	J
1	School's OPE ID	School's Name	Type of Request	Cohort FY	Date School Submitted Request	Date Data Manager Submitted Responses	Service Type	Tracking Number	Date School Signed for Responses	Comments
2	099999	Graphic Tech	IDC	2004	02/14/2006	03/02/2006	UPS	12345	03/05/2006	
3										
4										
5										
6										

Date 04/01/2006   Page 1 of 1

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

How a data manager submits
monthly status reports to Default Prevention and Management

A data manager may be able to submit a monthly status report via electronic mail. DPM will notify data managers each cycle how electronic mail will be accepted.

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 monthly status report as well as all other electronic and hardcopy documentation submitted as a part of the monthly status report process.

The data manager can use this information when submitting monthly status reports to DPM.

If sending by courier:

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

Do not send monthly status reports to any other address at the Department.