

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 the Department when those contacts change;
- ◆ notify the Department 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.

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 contact the Department 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 contact the Department 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 inform schools and the Department 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 the Department within the appropriate time frame. The data manager must also inform the Department of the incorrect submission.

When using the eCDR Appeals system, if you do not hold the loan that is being challenged, you should forward the DM adjustment ID to the correct data manager, following the guidelines on page 55 of the eCDR Appeals IDC User Guide, which is available on the eCDR Appeals homepage.

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 the Department a notice stating that the loans have been assigned to the Department. The data manager should

instruct schools to send the request to the Department 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?

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 the Department.

After a data manager is informed by the Department 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.

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

Please send ALL correspondence related to Cohort Default Rate challenges/adjustment/appeals to the following addresses:

The Department 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 correspondence as well as all other electronic and hardcopy documentation submitted as a part of the challenges/adjustment/appeals to process.

The data manager can use this information when submitting information to the Department.

If sending by courier:

U.S. Department of Education
Operations Performance Division
Union Center Plaza 114B4
830 1st Street, NE
Washington, DC 20002

If sending by U.S. Postal Service:

U.S. Department of Education
Operations Performance Division
Union Center Plaza 114B4
400 Maryland Avenue, SW
Washington, DC 20202-5353