

**GAINFUL EMPLOYMENT:**  
An Overview of Disclosure and Reporting Requirements

Zack Goodwin  
U.S. Department of Education  
VASFAA Conference, June 9, 2015




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**Agenda**

- Overview
- Disclosures
- Reporting requirements and methods
- Next steps and resources

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**Gainful Employment (GE) Regulations**

- Negotiated Rulemaking: three sessions of negotiations held without consensus
- Notice of Proposed Rulemaking published March 25, 2014 - Over 95,000 comments received
- Final Rule published on October 31, 2014
- Effective date July 1, 2015, for new reporting requirements
- New disclosure requirements effective January 1, 2017

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### What is a GE Program?

The Higher Education Act provides that to be eligible for Title IV funds, an educational program must:

- Lead to a degree, at a public or non-profit postsecondary educational institution; or
- Lead to a certificate, diploma or other non-degree credential, and prepares students for "gainful employment in a recognized occupation"

Most programs at for-profit institutions must lead to *gainful employment*

Most non-degree programs must lead to *gainful employment*

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### What is a GE Program?

At proprietary institutions, all programs are Gainful Employment programs *except*:

- Preparatory coursework necessary for enrollment in an eligible program
- Bachelor's degree programs in liberal arts offered since January 2009 by an institution regionally accredited since October 2007
- Approved Comprehensive Transition and Postsecondary Programs for students with intellectual disabilities

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### What is a GE Program?

At public and non-profit institutions, all non-degree programs are GE programs *except*:

- Preparatory coursework necessary for enrollment in an eligible program
- Programs of at least two years in length that are designed to be fully transferable to a bachelor's degree program, with no credential awarded
- Teacher certification programs, with no credential awarded
- Approved Comprehensive Transition and Postsecondary Programs for students with intellectual disabilities

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## What is a GE Program?

- Gainful Employment programs also include:
- Teacher certification programs *leading to a credential*
  - English as a Second Language (ESL) programs



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## GE Disclosures

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## Current Disclosure Items

- Occupations
- Normal time to complete program
- On-time graduation rate for completers
- Tuition & fees, books & supplies, room & board
- Placement rate for completers (per State or accreditor methodology)
- Median loan debt(s)
- Other program information required by the Secretary

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## Disclosure Template

- Released in September 2014
- Disclosure Template:  
<http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/negreg-summerfall.html>
- Template is an application that creates a standardized Web page (HTML) with GE disclosure information
- Web page must be hosted on Institution's site
- Deadline to update disclosures with 2013-14 information was January 31, 2015




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## Making Disclosures Available

Include the Template in all promotional materials that refer to the GE program

- If not feasible to include the Template, include a link or URL and clearly explain what is available at that Web page
- Post the Template on your institution's Web page
- Prominently display direct links to the Template on:
  - The GE program home page
  - Other institutional Web pages about the GE program

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## New Disclosure Requirements

- New disclosure requirements effective January 1, 2017
  - Through December 31, 2016, current disclosure requirements remain in effect
- Delay in effective date of new disclosure requirements gives the Department time to conduct consumer testing and prepare new disclosure template
  - Focus groups
  - Public comment
  - Technical guidance

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### Possible Future Disclosure Items

- pCDR (Program Cohort Default Rate)
- Debt-to-earnings ratios
- Loan repayment rates
- Completion rates
- Withdrawal rates
- Placement rates
- Median loan debt
- Percent borrowing




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### GE Reporting




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### Reporting Timeline

- Report all Title IV Students by *July 31, 2015*
  - Report 2008 – 2009 through 2013 – 2014 award years
  - Programs with medical and dental residencies report 2007 – 2008 through 2013 – 2014 award years
- Report 2014–2015 Award Year by *October 1, 2015*




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### GE Data to Report

*Only submit data for:*

- Students enrolled in a GE program
  - Title IV aid recipients (exclude FWS or FSEOG-only)
  - Programs that exist as of July 1, 2015
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- Data previously provided in 2011 can not be reused

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### GE Data to Report: Categories

- Institution Information
- GE Program Information
- Student Demographic Data
- Student Financial Data

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### GE Data to Report: Institution Information

- Institution OPEID
- Institution Name

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**GE Data to Report: Program Information**

- Program name
- Award Year
- CIP Code
- Credential level
- Medical and dental internship or residency
- Length of GE program
- Length of GE program measurement

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**GE Data to Report: Student Demographics**

- Social Security Number
- First name, middle name/Initial, and last name
- Date of birth
- Enrollment status as of 'first day' of enrollment in program
- Program attendance begin date
- Program attendance begin date for Award Year
- Program attendance status during Award Year (Graduated, Withdrew, Enrolled)
- Program attendance end date

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**GE Data to Report: Student Financial Data**

- Private student loans
- Institutional debt
- Tuition and fees
- Allowance for books, supplies, and equipment from the Cost of Attendance

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### Reporting GE Data: Program Information

- Length of GE program
  - The length of the instructional program in years, months, or weeks as published by the school
    - Format "nnnnn", with an implied decimal point between the third and fourth digits
- Length of GE program measurement
  - The unit of measure for the length of the instructional program as published by the school
    - 'W' (Weeks)
    - 'M' (Months)
    - 'Y' (Years)

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### Reporting GE Data: Credential Level

- Credential Level of the program in which the student was enrolled during the award year
- '01' (Undergraduate certificate or diploma Program)
  - '02' (Associate's degree)
  - '03' (Bachelor's degree)
  - '04' (Post baccalaureate certificate)
  - '05' (Master's degree)
  - '06' (Doctoral degree)
  - '07' (First professional degree)
  - '08' (Graduate / professional certificate)

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### Reporting GE Data: Program Attendance Status

- 'G' (Graduated) if student graduated from their educational program at any time during the award year
- 'W' (Withdraw) if student withdrew from the educational program at any time during the award year
- 'E' (Enrolled) if student was enrolled in the educational program on the last day of the award year, *June 30*

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### Reporting GE Data: Enrollment Status

Student's enrollment status as of the first day of enrollment in program

- 'F' (Full-Time)
- 'Q' (Three-Quarter Time)
- 'H' (Half-Time)
- 'L' (Less Than Half-Time)

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### Reporting GE Data: Institutional Debt

- Outstanding institutional loans
- Outstanding payment plans
- Unpaid tuition

**Funds owed to a school due to a Return of Title IV funds are not considered institutional debt unless a portion of tuition is left unpaid**

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### Organizing Your GE Data

- Single Program by Award Year
- Single Program by Multiple Award Years
- Multiple Programs in a Single Award Year
- Multiple Programs in Multiple Award Years

*Data should be accurate, complete and consistent – quality reviews are encouraged!*

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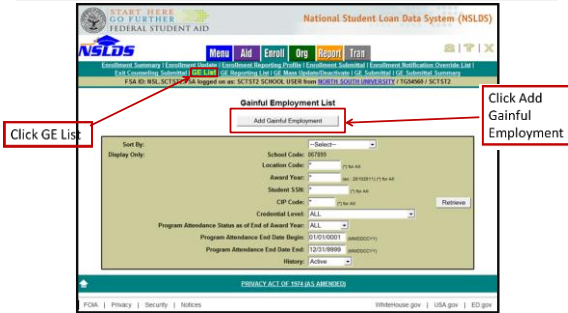
# Reporting GE Data to NSLDS

- Online
  - GE Add
  - GE Spreadsheet Submittal
- Batch file
  - Fixed-Width
  - Comma Separated Values (CSV)



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# Adding Records Online



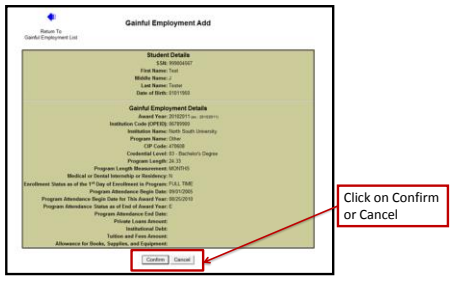
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# Adding Records Online



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### Adding Records Online



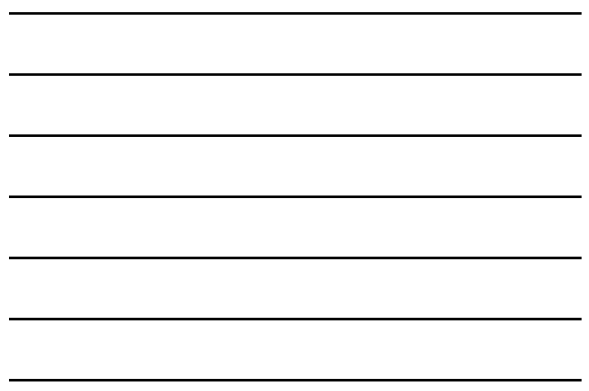
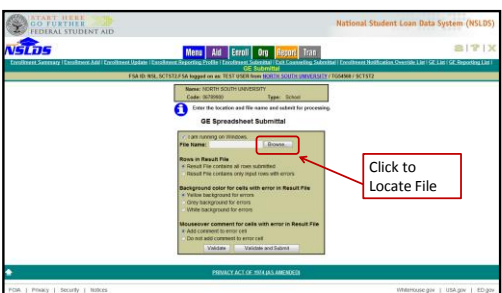
### GE Submittal Spreadsheet

Spreadsheet format posted to [FSADownload.ed.gov](http://FSADownload.ed.gov) on February 13, 2015

Award Year	Student Social Security Number	Student First Name	Student Middle Name	Student Last Name	Student Date of Birth	Institution Code	Institution Name	Program Name
20102011-00-11-2222	Test first	Test middle	Test Last	1966-07-21	06789900	testinstnm	test prog na	
20102011-111-22-2222	Test first	testmiddle	testlaste	1966-07-21	06789900	testinstnm	test prog r	
20102011-223-01-0001	Test first	testmiddle	testlaste	1966-07-21	06789900	testinstnm	test prog na	



### GE Submittal Spreadsheet



### GE Submittal Spreadsheet

The screenshot shows a software window titled "I am running on Windows." with several sections:
 

- File Name:** A text field with a "Browse..." button. A callout box points to it with the text "Click to Locate File".
- Rows in Result File:** Two radio button options: "Result File contains all rows submitted" (selected) and "Result File contains only input rows with errors".
- Background color for cells with error in Result File:** Three radio button options: "Yellow background for errors" (selected), "Grey background for errors", and "White background for errors". A callout box points to this section with the text "Select Options for Results File Presentation".
- Mouseover comment for cells with error in Result File:** Two radio button options: "Add comment to error cell" (selected) and "Do not add comment to error cell".
- Buttons:** "Validate" and "Validate and Submit" buttons. A callout box points to these buttons with the text "Validate, or Validate and Submit records to NSLDS".

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### GE Submittal Spreadsheet

The screenshot shows a spreadsheet with columns: Award Year, Student Social Security Number, Student First Name, Student Middle Name, Student Last Name, Student Date of Birth, Institution Code, Institution Name, Program Name, CIP Code, and Cover.
 

- Row 3 (index 2) has a yellow background for the "Student Social Security Number" cell. A callout box points to it with the text "Yellow background for errors".
- Row 4 (index 3) has a red corner in the "Cover" cell. A callout box points to it with the text "Red corner indicates Mouseover is available for error".

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### Batch Reporting

- Batch Reporting
  - Submittal File Formats posted to IFAP on January 9, 2015
- Message Classes to Send to NSLDS
  - Fixed-Width (GESFLEIN)
  - Comma Separated Values (GESCDEIN)
- Set up GE Batch Services on [www.fsawebenroll.ed.gov](http://www.fsawebenroll.ed.gov)
- Updated Gainful Employment User Guide coming soon

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### Reviewing GE Data

Gainful Employment List allows you to retrieve GE data once it has been populated on NSLDS to:

- Review for data completeness
- Review for data accuracy
- Review for data consistency

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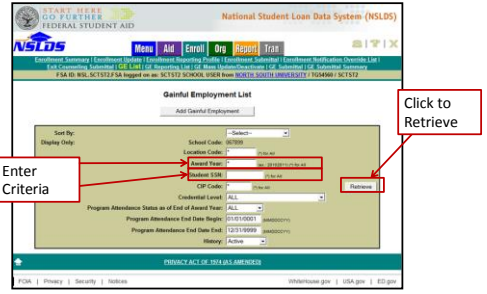
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### Reviewing GE Data: Single Records




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### Reviewing GE Data: Multiple Records




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### GE Extract

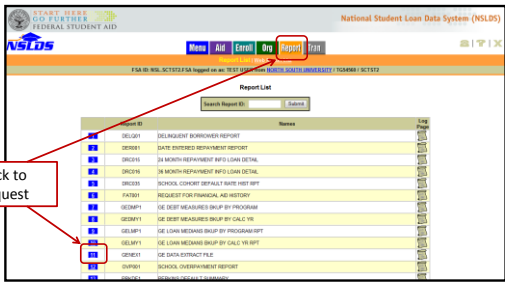
Gainful Employment Data Extract File:  
Record Layout (GENEX1)

- Allows school users to request an ad-hoc fixed-width extract of the Gainful Employment data supplied by the institution
- Data supplied by all submission methods is present in report
- Can be requested by multiple parameters to create a more individualized method of data review
- File will be delivered to the SAIG mailbox associated with the FSA User Id which made the request
- File will be delivered using the message class of AHSLDEOP

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### GE Extract



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### Updating GE Data

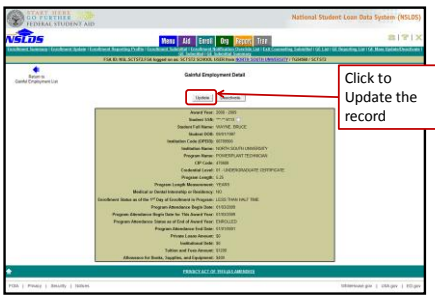
If a record has been identified for which one or more updates or corrections are needed, various methods are available to make those changes

- Single Record Update
- Single Record Deactivate
- Mass Update/Deactivate

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### Single Record Update




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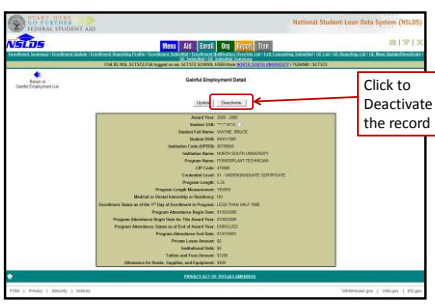
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### Single Record Deactivate




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### Online Mass Update/Deactivate

- Allows user to select records already on NSLDS using Search and Filter criteria for update or deactivation
- Can only be performed one Award Year at a time
- Can only be performed for a CIP Code and Credential Level Combination
- Only records which match the Filter fields will be identified for update/deactivation
- All records will have the same changes applied when updated
- If no records match the Filter fields, no updates will be made
- Use Caution with the deactivate function, as it cannot be reversed!




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**Online Mass Update/Deactivate**

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**Updating GE Data**

- If any of the following fields are updated, the original record is deactivated and a new record created:
  - Student SSN
  - Institution OPEID
  - CIP Code
  - Credential Level
- If Award Year needs to be updated, the original record must be deactivated and a new record submitted

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**Updating GE Data**

Records can be updated in batch for the same Award Year for all but the following fields:

- Award Year
- Student SSN
- Institution (OPEID)
- CIP Code
- Credential Level
- Program Attendance Begin Date
- Program Attendance Begin Date for This Award Year
- Program Attendance Status Date

**CAUTION:** If any of these fields ARE updated in batch, the existing GE record is not updated. A NEW active record will be created. The original record would then need to be manually deactivated to prevent the existence of duplicate records for the student

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### Common NSLDS Submission Issues

**Problem:** Batch file was submitted and a GE Response Error/Acknowledgement File was not received.

**Resolution:** Call the Customer Support Center to troubleshoot the issue which may be one of the following:

- Security Issue
- Transmission Issue
- File Layout Issue

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### Common NSLDS Submission Issues

**Possible Issue: Security**  
- Did you setup the GE Batch Services on [www.fsawebenroll.ed.gov](http://www.fsawebenroll.ed.gov)?

**Possible Issue: Transmission**  
• Did you use the appropriate message class?

**Possible Issue: File Layout**  
• Did you follow the Record layout and field definition specifications in the Updated NSLDS GE User Guide (e.g., header, footer)?

**Possible Issue: Data Elements**  
• Did you use 2010 CIP Codes?  
• Did you use appropriate number and date formats?

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Next Steps

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### Gainful Employment Certifications

- December 31, 2015: Transitional certifications due
- Certify that each currently eligible GE program is:
  - Approved by accrediting agency and State
  - Qualifies graduates to meet educational prerequisites of the licensing or certification exam required to work in the state, if any
- Certifications renewed when institution recertifies Program Participation Agreement (PPA)

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### Gainful Employment Measures

- Debt-to-earnings (D/E) rates
  - Annual Earnings D/E rate
  - Discretionary Income D/E rate
    - Passing: Annual D/E <= 8% or Discretionary D/E <= 20%
    - Failing: Annual D/E > 12% or Discretionary > 30%
    - Zone: Annual D/E > 8% and <= 12% or Discretionary D/E > 20% and <= 30%

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### Gainful Employment Measures

A program loses Title IV eligibility if it:

- Fails D/E measures in two out of three years

*or*

- Fails *or in the Zone* for four consecutive years

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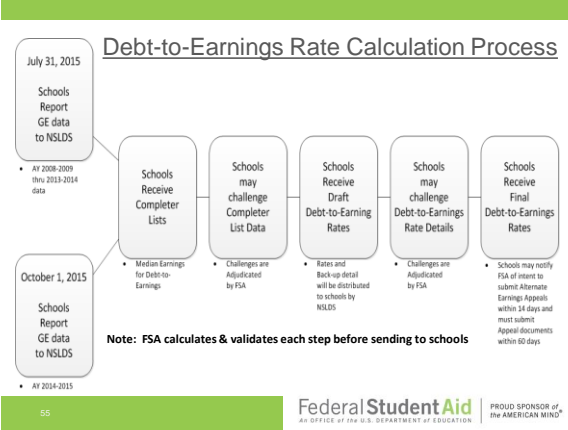
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## Resources

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### GE Information Page

- Federal Register notices
  - DCLs and Electronic Announcements
  - FAQs
  - Webinars and presentations
  - Submission file formats
- <http://www.ifap.ed.gov/GainfulEmploymentInfo/indexV2.html>

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## GE Information Page



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## NSLDS Contact Information

### Customer Support Center:

- Phone: 800-999-8219
- Toll: 785-838-2141
- Fax: 785-838-2154
- Web: [www.nslsdfap.ed.gov](http://www.nslsdfap.ed.gov)
- E-mail: [nsls@ed.gov](mailto:nsls@ed.gov)

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## Inovas Contact Information

- GE Disclosure Template
  - Template application
  - Quick start guides
  - Bulk data file upload tool
- Help desk: 855-359-3697, [gedt@inovas.net](mailto:gedt@inovas.net)

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### GE Support

*If you still have questions after reviewing pertinent information posted on IFAP, send questions to [GE-Questions@ed.gov](mailto:GE-Questions@ed.gov)*



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### Thank you!

Zack Goodwin  
[zachary.goodwin@ed.gov](mailto:zachary.goodwin@ed.gov)  
617.289.0051



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### We Appreciate Your Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation:

• <https://www.surveymonkey.com/s/ZacharyGoodwin>

This evaluation tool provides a means to inform us of areas for improvement, and to support an effective process for listening to our customers.

Additional feedback about training can be directed to [annmarie.weisman@ed.gov](mailto:annmarie.weisman@ed.gov).

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### Department of Education Contacts

#### Region I Training Officers

Pam Gilligan  
pam.gilligan@ed.gov  
617.289.0022

Zack Goodwin  
zachary.goodwin@ed.gov  
617.289.0051

Anita Olivencia  
anita.olivencia@ed.gov  
617.289.0130



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### Department of Education Contacts

Research and Customer Care Center  
800.433.7327  
fsa.customer.support@ed.gov



Reach FSA  
855.FSA.4FAA -- 1 number to reach 10 contact centers!

- |                                 |   |
|---------------------------------|---|
| <i>Campus Based Call Center</i> | <i>eZ-Audit</i>                               |
| <i>COD</i>                      | <i>School Eligibility Service Group</i>       |
| <i>CPS/SAIG</i>                 | <i>Foreign Schools Participation Division</i> |
| <i>NSLDS</i>                    | <i>Research and Customer Care Center</i>      |
| <i>G5</i>                       | <i>Nelnet Total &amp; Permanent</i>           |
|                                 | <i>Disability Team</i>                        |

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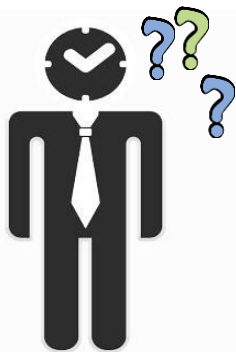
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