GAINFUL EMPLOYMENT: An Overview of Disclosure and Reporting Requirements

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Agenda

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

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
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”

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

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
What is a GE Program?

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

GE Disclosures

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
Disclosure Template

- Released in September 2014
- 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

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

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
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

GE Reporting

Reporting Timeline

- Report all Title IV Students by July 31, 2015
  - Programs with medical and dental residencies report
- Report 2014–2015 Award Year by October 1, 2015
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
- Data previously provided in 2011 can not be reused

GE Data to Report: Categories

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

GE Data to Report: Institution Information

- Institution OPEID
- Institution Name
### 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

### 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

### 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
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)

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)

Reporting GE Data: Program Attendance Status

• ‘G’ (Graduated) if student graduated from their educational program at any time during the award year

• ‘W’ (Withdrew) 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
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)

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*

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!*
Reporting GE Data to NSLDS

- Online
  - GE Add
  - GE Spreadsheet Submittal

- Batch file
  - Fixed-Width
  - Comma Separated Values (CSV)

Adding Records Online

1. Click GE Link
2. Click Add Gainful Employment
3. Add Student Details
4. Click Submit
Adding Records Online

Click on Confirm or Cancel

GE Submittal Spreadsheet

Spreadsheet format posted to FSADownload.ed.gov on February 13, 2015

Click to Locate File
GE Submittal Spreadsheet

Select Options for Results File Presentation

Validate, or Validate and Submit records to NSLDS

GE Submittal Spreadsheet

Red corner indicates Mouseover is available for error

Yellow background for errors

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

- Updated Gainful Employment User Guide coming soon
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

Reviewing GE Data: Single Records

Click to Retrieve
Enter Criteria

Reviewing GE Data: Multiple Records

Click to Retrieve
Enter Criteria
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

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
Single Record Update

Click to Update the record

Single Record Deactivate

Click to Deactivate the record

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!
Online Mass Update/Deactivate

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

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.
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

Possible Issue: Security
- Did you setup the GE Batch Services on 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?

Next Steps
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)

Gainful Employment Measures

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

Gainful Employment Measures

A program loses Title IV eligibility if it:
- Fails D/E measures in two out of three years
- Fails or in the Zone for four consecutive years
Debt-to-Earnings Rate Calculation Process

Note: FSA calculates & validates each step before sending to schools

Resources

GE Information Page

- Federal Register notices
- DCLs and Electronic Announcements
- FAQs
- Webinars and presentations
- Submission file formats
  
GE Information Page

NSLDS Contact Information
Customer Support Center:
• Phone: 800-999-8219
• Toll: 785-838-2141
• Fax: 785-838-2154
• Web: www.nsldsap.ed.gov
• E-mail: nslds@ed.gov

Inovas Contact Information
• GE Disclosure Template
  ‐ Template application
  ‐ Quick start guides
  ‐ Bulk data file upload tool
  ‐ Help desk: 855-359-3697, gedt@inovas.net
GE Support
If you still have questions after reviewing pertinent information posted on IFAP, send questions to GE-Questions@ed.gov

Thank you!

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

Campus Based Call Center
eZ-Audit
COD
School Eligibility Service Group
CPS/SAIG
Foreign Schools Participation Division
NSLDS
Research and Customer Care Center
G5
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Federal Student Aid