

NASFAA's "Off the Cuff" Podcast – Episode 312 Transcript

OTC AskRegs Experts: Updates on GE & FVT Reporting

Hugh Ferguson:

Hey, everyone. Welcome to another episode of "Off the Cuff." I'm Hugh Ferguson with our communications team.

Jill Desjean:

I'm Jill Desjean with NASFAA's Policy Team.

Sarah Austin:

And I'm Sarah Austin, also with the Policy Team.

Hugh Ferguson:

Welcome, Jill and Sarah. I was just remarking with Sarah before you joined us, Jill, of how disoriented I am with the time off this week between Tuesday being an off day, and now Monday being an off day, and just trying to get all my notes organized for our day-to-day.

Jill Desjean:

Yeah, I hadn't really noticed. And then we were in that meeting together yesterday and someone from another organization said, yesterday she was like, "Tomorrow feels like it should be Friday." And I was like "A hundred percent, yes." And yeah, it's like now it is the end of the week, but I'm all out of sorts. A Tuesday off is just a strange day to have off.

Hugh Ferguson:

For sure. Yeah. Yeah. And as folks know, we had election day. We have plenty of coverage in today's news about the new administration and some races that have been called. We know the Senate has tipped towards Republican control. We're waiting for more details in the house dynamic. And if folks want to catch up on our coverage, all that's available in today's news along with some details on previews for the upcoming Trump administration, so folks can get caught up there.

But for today, we're going to catch up on a couple of topics here that have been top of mind for members. And the first one we're going to dig into here is what's going on with gainful employment and financial value transparency. We seem to frequently have updates or new information related to GEFVT. Yeah, I was wondering, to start, Sarah, can you maybe just recap some of that information and provide what this most recent update is to our members?

Sarah Austin:

Yeah, of course. It does seem like every time we talk about it, there's something new to talk about. So let's, yes, go back to a quick recap.

So back in the spring, the department had released these three reports that we kind of call the NSLBS reports. And they were to assist schools in their GEFVT reporting. So that's back in the spring. And then flash forward to August, they announced at the end of August that there were issues with these reports, and then also issues with the draft-completers lists, which are lists that the department sent to schools

as well. And so there's issues with both. And they at that point in time had suggested that schools stop using the NSLBS reports, those three reports, and then also to pause on reviewing their draft-completers lists. And we'll get more into that in a minute. But they kind of announced that they should pause on both of those in August while they researched and corrected what needed to be fixed.

So then of course, in September, middle of September, they announced that they would be pushing the deadline for the reporting and the review of the draft-completers list to January 15th instead of in October. And so we knew that now schools would have more time to review those lists and work on the report. So, the pause on the reports in the list was announced, then the deadline was pushed, and then now where are we today, is where I want to talk about next.

So, the weekend of October 26th, the department announced that they would be sending new draft-completers lists to schools. So those previous lists that they did in fact decide were incorrect or had errors. They corrected the issues and then they were sending these new draft-completers list at the end of October.

And these are transmitted to schools via their SAIG mailbox, their S-A-I-G mailbox. And if the schools had not received them, there's also a way to get an ad hoc report. But that weekend is when they were sent to schools. So schools should have received them as long as they were signed up to receive those reports. If not, again, they can go to the ad hoc instructions, and then also for future reference, they can sign up to receive the reports automatically.

And more information about all of that was early on in the year. In the June 13th electronic announcement, there's more instructions about how to sign up and all of that. We will link in our show notes, of course. But basically, these draft-completers lists, schools have now until January 15th, like I mentioned, to review the list, the students on the list, and decide if any corrections need to be made. So if students need to be removed from the list, if students need to be added to the list. The school needs to review those lists and then make any sort of corrections that need to be made, by January 15th.

And so there's going to be then a final list, so this is the draft list. And then after the school makes all of those changes, or if there's no changes to be made, of course, that's fine, but if they make those changes by January 15th, then after that deadline, the department will release a final version of the list. And what that final list is, is basically the list of students that they're then going to gather earnings data on from the IRS, in order to calculate their metrics, the DE and the EP metrics that are needed for gainful employment, financial value, transparency. So the list themselves are for schools to review and correct by January 15th, then the final version is issued after that. That is what ED will use to gather their earnings data. And like I said, all schools should now have those draft-completers lists, so they should be able to start working those, reviewing them, making those corrections as needed. So that's the first big update that just happened recently.

The second update I wanted to talk about is the other part, the NSLDS reports that I mentioned earlier. So there's three reports that the department has made available to assist schools in the actual reporting. So this is the other piece. There's the completers list piece, and then there's the reporting piece. And the reporting piece uses these three reports in NSLDS to assist schools in order to gather the correct information that they'll need for reporting. Now, like I said, these were also had errors or issues that the department needed to fix back in August. And since then, they have actually fixed one of the three reports. So, as of November 1st, one of those reports is available for schools again. And this is the program enrollment detail report. And they of course have odd report names. So this is SHDPE1, if you're following along with which report. But this is the program enrollment detail report. So the detail report, not the summary report.

But anyways. So that one report is available now for schools. The other two reports are actually still being worked on, so they're still needing some fixes before they will be available to schools to use again.

But I did want to make sure schools knew that one report is now available and able for them to use with the reporting.

Now, these three reports, we won't go into the details of all of them, but there was a webinar that the department did back in May that kind of walked through and even showed some of these reports. So that may be helpful for members to review if they want. But this detail, or the program enrollment detail report, the one that is actually available now, I just wanted to mention what this specific report is. So it is providing the schools with a list of students and their program enrollment data that of course was reported to NSLDS. And this is going to show students who have received Title IV aid at that school, your school, or at another school included on the report.

So schools can use this report to assist in identifying the students that had Title IV aid for the program that would require FET or GE reporting. And they can generate this report in NSLDS, and there's different formats of the report that they can download from there. And then, the important note I wanted to make that the department has made is that this report will include all of the students with the certified enrollment data, even if that student did or did not receive Title IV aid at your institution. But when you get to the actual reporting piece, of course, you only need to report on the students who did receive Title IV aid. So that was one distinction on this particular report that the department made that I think is important for schools to know. So that's the two major updates at least for right now. Of course, we will be waiting for the other two reports to be available, and we hope that is soon.

Hugh Ferguson:

Yeah, thanks for that, Sarah. I have to ask, how does the department come up with the naming conventions for these reports? Is there a rhyme or reason for these letters?

Sarah Austin:

Looking at it, some of the letters kind of match the words in the title of the report, but I honestly have no idea. I think it's funnier when people try to say the report name. They're like, "Oh, the WP report," instead of just saying whatever the report or whatever the letters are making it-

Jill Desjean:

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Sarah Austin:

I'm like, "What report are you talking about?"

Jill Desjean:

Yeah, I heard the department do that actually recently on [inaudible 00:10:22] call. They've got some, it's like the list, the technical list they have, the bugs that they put out recently, and it's got a name that someone in IT gave it to. But I heard it's like non-literates, and it's someone at the department just tried to turn it into a word and it's like, "Oh, too much."

Sarah Austin:

Yes. From working previously at a school that's a banner school, and knowing that all of our screens, the screenings are all letters, and we made them all into words, is hilarious to hear if you don't know a banner.

Jill Desjean:

That's so funny, yeah. I used to work at a banner, like RapAward.

Sarah Austin:

RapAward was probably the most common.

Hugh Ferguson:

Well, if listeners have any recommendations for names they want to use for these reports, please send us your suggestions in the comments. But yeah, so getting back to the conversation, Sarah, do you want to share some common questions we're getting to maybe help clear up any confusion on this issue?

Sarah Austin:

Yeah, I think that the most, at least recently, the most common question we've been hearing is, what actually is the difference between the completers list and the NSLDS reports? And I think it's to no fault of the schools that there is confusion here. I was confused myself, and I mean, Jill and I live in this all the time. We are in this world all the time, and still it's confusing to us. So I think we wanted to make it clear that, first of all, completely separate things. Completers list, NSLDS reports. Completely separate. I think when they were put on pause together at the same time, there was a lot of confusion of like, "Are these all the same thing? Are these related to each other? Are we using all of these things for the same use because they're on pause all at the same time?" And they are actually completely different and also completely distinct from each other.

So, the completers list versus the students that would be on the list in the NSLDS reports are completely different. They are different years of data, different students, and have completely different uses. So you really want to start to think about them distinct from one another, even though they are both related to the gainful employment, financial value transparency. And they both have January 15th deadlines. Other than that, think of them completely separately. So, the completers list are simply for the school to review to make sure the data is correct, the correct students are on those lists, and then correct them if needed for the department. But that is really the only action for the school with the completers list. Everything else is then taken by ED. They're going to take those lists, they are going to gather the information on the earnings data for those students from the IRS, but the school's action is just reviewing and correcting the list. Nothing to do with the actual GE-FET reporting that the school will do.

The NSLDS reports help a school compile their list of who they actually do need to do the reporting on. So the NSLDS reports are in fact part of the actual reporting that a school will do. And so again, think of them separately. And also the next most common question I would say is, okay, so do we need the completers list in order to do our actual GE-FET reporting? And the answer is no, because again, they are distinct from each other. So while they're related, you do not need to finalize your completers list or have a final version of your completers list in order to do your GE and FET reporting, because again, they're going to be different, students' different years of data.

So that January 15th deadline for reviewing your completers list, I think a lot of people thought, "Why is that deadline the same? Don't you need to do the completers list before you can do your reporting? What's the point of having a deadline on the same day if one has to happen before the other?" And that is not true. You do not need to finalize your completers list, and you do not need to get that final version back from ED before working on your reporting. You can do these separately from one another.

The other important thing that I would think along those same lines is that with the finalized completers list, the school really doesn't need to even worry about the finalized list, because they have the draft list. The school is the one that's making the corrections, making the changes, either adding or removing students as needed to make the final list. So once they make the corrections, they know the list is final, so they don't really even care about ED then issuing back the final list, because they're the ones that made the changes to the draft list to say what should be on the final list. So while ED will, after that January 15th deadline, they will actually release the final list, the school should already know who's on the list, because they're the ones that made the changes to the list, if that makes sense. How many times can I say list in one minute?

Jill Desjean:

I think that's a really important point, Sarah, but I want to sort of highlight is, the department's not validating, it's not like you're making corrections to your completers list and that a department is going in and doing something where they're saying like, "Oh, no, you took that student off, but we're putting them back on." The changes you make are the changes that make the final list. So you do know. You take the original list, keep track of all the changes you made, that's your final list, that's what will come from the department. But there isn't a step in there.

I think when you're thinking about COD and other stuff, you send out your originations, you get some rejects. It's this back and forth where there's some validation happening, that's not happening with the completers lists. And so you really do know who's on your completers list, because the department sends you a draft, you add and remove people as you need to, and that's your final completers list, even if you don't have it in hand where you do your reporting, because it's not for reporting.

Sarah Austin:

Yes, that is correct. And also, I think that brings up a good point that even the draft completers list, I think schools were like, "There's a bunch of people on this list who I didn't think should be on it," or vice versa. And that is coming from your data. So the stuff that you reported is what made that list. It wasn't the department saying, "Here's who we think should be on your list," after we went through and reviewed all of them. It was, "Based on the data that you have previously reported via NSLDS, here is your list of completers. Now you need to review and decide if there's actually people missing or people on here who should not be." But like you said, the department's not telling you who should be on your list. They're simply pulling the data that's already been given to them, and giving you that list to then correct if needed.

Jill Desjean:

Yeah, I think it's definitely worth mentioning that the few people we've heard from who've said, "Oh, my God, my completers list is a disaster," if they've reached out to the department and said, "Explain this," they've come back and said, "Actually the department explained pretty well why the students I thought would be on there were, and why students that I thought shouldn't be on there were on there." We're not quick to the defend of the department. And I'm certainly not, it's been a handful of things. But it has more to come, for sure. I get why people don't trust what's coming from the department. We just came off 24-25, this disastrous FAFSA year. And then they released the completers list from the NSLDS lists in the fall and then said, "Oh, sorry, they're all wrong." Why would you assume that the new ones are right?

I think everyone's completely in the right to say, "This is a disaster. This is all wrong." But I'm cautiously optimistic that the couple people we've heard who thought their lists were wrong actually when they

heard from the department, understood now, "Oh, this is what I was misunderstanding." I wish the materials the department I put out were clearer so that there wasn't confusion at all. But people aren't wrong to not trust what's coming.

Hugh Ferguson:

If listeners want more information on these lists, where should they go?

Sarah Austin:

So this is actually very timely, because just today, the day we're recording, the department put out what I have found to be super helpful. I will be interested to see if schools agree since they're, of course, the ones actually doing the reporting. But they put out this new supplemental training resource is what it's called. And again, just went out this week. And it's basically a training resource, like a guide, that goes through and answers a lot of these questions we just talked about. But also I found the most helpful thing to be kind of a comparison between the completers list and the NSLBS reports, and the reporting that actually comes from that. So again, showing that they're distinct, showing that they are different sets of data, and then really explaining which years are on the completers list, because I do think schools even thought, when they got their completers list, like, "Why do I only have these years of data? Where's everything else?"

And so it really goes and says exactly which years you should be having on your completers list, and then again, which years those NSLBS reports are going to pull data for in order to do your GE-FET reporting. So I found it very helpful. I hope that schools will find it helpful as well. And it does have its own FAQ section to go through some of those questions that I think schools have been asking, and does clear up a lot of the confusion between these different lists and reports, and also how they should be using them.

So I do think that is probably my most highlighted resource right now. But of course, there's been this long-standing list of all these resources for GE and FET, like the knowledge centers topics page, there's a set of actual GE-FET FAQs the departments put out, things like that, which of course will link in our show notes. But I want to make sure schools knew about that new supplemental training resource that was just released.

Hugh Ferguson:

Awesome. Sounds great. All right. Thanks, everyone, for tuning into this week's episode of "Off the Cuff." We really appreciate you guys tuning in. Make sure you subscribe on your podcast channel of choice. Send us your comments, and we will be back with more topics very soon.