

# NASFAA's "Off the Cuff" Podcast – Episode 317 Transcript

OTC AskRegs Experts: Updated Timelines for NSLDS, Batch Corrections, GE & FVT

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 back, Jill and Sarah. Just looking at all the things that have come up in the last week, and it seems like today's episode is going to be a recap of just last Friday alone where the department decided to put out quite a lot of information for everyone to digest over the long weekend. So I guess just to kick things off, Jill, we saw a lot happen on Friday, could you kind of catch us up with, I don't know if this was the first thing to come out or which order, but definitely a big item to dig through?

Jill Desjean:

Yeah, I think we're starting with the last first, but honestly last Friday's a blur. Last Friday was one of those moments where you're like, "Wow, thank goodness we only have elections every four years," because this was just a lot of cleanup from the outgoing Biden administration, their last minute stuff that they wanted to get out and say before the inauguration on Monday. So I'll get us started off with NSLDS post-screening, and then I'll let Sarah fill us in on batch corrections and gainful employment and financial value transparency.

So just for some background, because I know post-screening's a little weedy, and I know not everyone listening actually works in a financial aid office, so this post-screening process from NSLDS is this process that runs on a regular basis by the department to look for changes to affect student's financial aid history since they filed their FAFSA. So as an example, if a student borrowed a new loan or took out a new Pell Grant and it put them close to or over their aggregate or a lifetime or even annual limits, a new ICER would go to the financial aid office with sort of a flag, a comment code that says, "Hey, you need to look at this student's eligibility. Something might've changed and you might have to adjust their aid for the current year to prevent them from being over-awarded or getting an overpayment."

And so that process has not worked since the overhaul of the FAFSA system for the '24/'25 aid year. So schools are getting an initial ICER that is pinging NSLDS and it does show the student's financial aid history as of the date that they filled out their FAFSA, or I guess as of the date technically that their ICER was processed. But then if anything changes, the school hasn't been alerted like they had been in the past through this NSLDS post-screening that would send a new ICER to the school. So schools have been forced to manually check before dispersing aid to students that nothing has happened in a student's financial aid history since they first got that ICER that would cause the student to have received too much aid or even potentially lost eligibility for aid.

Hugh Ferguson:

So with all of this, what's the update and is there any good news or bad news here?

Jill Desjean:

Yeah, so the update is, it's not ready yet. We were promised that this functionality would be up by the end of 2024. We're recording on January 23rd 2025, so clearly that date came and went. And so earlier in January, before last Friday, the department did say, "Hey, you might've noticed we missed our deadline." And they said it's looking more like early spring. So that bad news came before last Friday.

On last Friday, they provided information about a new report that they're creating for schools to more easily identify students whose NSLDS financial aid history has changed and who would normally be getting an updated ICER from the post-screening process, which is now delayed a few more months. So it's kind of good-ish news. They still have this manual process to follow until the spring, but I see these lists as potentially catching any issues that schools might've missed when they were searching for post-screening issues on their own.

These lists are also probably a lot shorter than what schools were using to manually search for issues on their own because schools were likely just pulling an NSLDS financial aid history for everyone. Maybe they could weed out a few students and say, "I know this student can't possibly be over," but for the most part they were probably pulling financial aid history for everyone and then separating out their students who they identified as having issues, while this is telling schools exactly who would've been on a post-screening report so it's narrowing down that list of students significantly and telling the schools, "This person is over their aggregate limits. This person is close to their aggregate limit," whatever it might be. It's 80,000 ish total students, so some schools might not have any, schools may have tens, but I wouldn't expect that any school would have many hundreds or many thousands of these. So a shorter list to work from essentially.

We haven't really heard back from schools either way in terms of the reaction to this news. So it's hard to tell you, getting back to that initial question of is it good news or bad news, if schools are just feeling, "Well, this is too little too late. We've already got a process, we've been using this manual workaround," or if this will help them at all for these next couple of months until post-screening is up and running. So we'll see more to come.

This news also we may not have just heard from schools because this was the third in a string of announcements that were pretty major on Friday. So with that, I will pass things off to Sarah who can talk about the other developments that happened on Friday.

Sarah Austin:

Yes, thanks Jill. I know we were talking earlier this week, we felt like we lived multiple lives just on Friday, so even trying to find to recap these things, I'm like, "What day was that? Oh yeah, also Friday. What day was that? Oh, also Friday." So everything happened on Friday, but it felt like a week in one day at least for me. But yes, let's talk about the next announcement, which I believe was maybe the first one, I can't remember now, but this is partially better news I'd say. I wouldn't go as far as to say good news, but better news.

So related to the batch corrections process, we learned on Friday that the timeline has been updated for the better. So originally we were told that batch corrections functionality would be ready by the end of first quarter, so March. Now we know it'll be actually the end of February, so a month earlier than we were thinking. And the other piece of information we learned in this electronic announcement was that they're actually doing kind of a beta period for batch corrections testing, which is good news, I would say any sort of testing before releasing it to everyone is good news. So they are doing over the next few weeks a beta period, testing the batch corrections functionality with the schools that they had worked

with previously in the fall on the beta period. So they're going to have those schools submit batch corrections, make sure everything is successfully processed, no issues, obviously fix any sort of bugs or issues that do come up, and then the general release of the full functionality to everyone would be by the end of February.

Now, one piece that I know was important in that electronic announcement is that schools submitted batch corrections even if they were not functioning. So they would transmit the files, but nothing would happen with them since this batch corrections functionality was not working. Obviously at some point schools would know, "Batch corrections aren't working, I need to do this manually to actually get the correction to work." But there is still this giant queue... I guess I shouldn't say giant, I don't know how big of a queue it is, but there's a queue of ICERs know that schools had made corrections to, transmitted but were never processed and they will never be processed.

So the department stated an electronic announcement that they will wipe that whole queue, delete all of those records in order to not create confusion and complication and conflicts in ICERs because presumably if a school sent a correction like last fall, they've now since done the manual correction, moved on, given aid based on that correction, we don't now want that old batch correction to come through and then override that one. So it seems much more simpler, they're just going to wipe that whole queue of those batch corrections before the general release at the end of February.

But what I do think is important to think about is they mentioned specifically if a school was to submit a correction now in this kind of beta period, if the school is not participating in the beta period, anything they submit now will still get wiped before the end of January. So schools should not be relying on the batch corrections process until it's actually released at the end of February, and of course they'll announce an exact date when that is coming. So if a school was to submit one and then think that it would go through, it will not, they will need to resubmit after the general release in February.

Jill Desjean:

And just reiterating here, Sarah, batch only, right? Like manual corrections are still happening.

Sarah Austin:

Totally fine, yes.

Jill Desjean:

Schools are still doing those. If you submit one tomorrow, you're great. If you submit one in six months, you're great, this is just batch.

Sarah Austin:

Yes, thank you for clarifying that, yes.

Hugh Ferguson:

Awesome. That's really helpful. Yeah, it seems like we're doing all the beta testing now, which seems like a very good sign for working through some of these complicated issues. So also on Friday, Sarah, we had even more news, and I don't know which order this popped up in the Slack channel, but could you catch us up on the latest concerning GE and FVT?

Sarah Austin:

Yes. I would say, I don't know, this might've been the middle announcement, but this was the one I heard the most about from our members, this is the one I saw the most chatter about. But yes, we have an update for GE/FVT reporting. So as I'm sure we all know, the deadline was January 15th for the reporting and that has since passed. And on Friday after that deadline, the department announced that they would actually be reopening the GE/FVT reporting system to accept data until February 18th, so basically a month extension, while they're not calling it an extension, they are just simply reopening the system to accept data but it really wasn't worded as an extension.

But the reasoning kind of behind why they said they were reopening is that there was pretty significant processing times that we were hearing from schools. So if they were submitting in those days leading up to January 15th, some schools were reporting they'd submit their file and 16 hours later they would get a error and then they'd have to resubmit it. So because of those increased processing times and also the ability for schools to actually get their files back to correct anything did not seem to be going well, the department did say that's why they're reopening to give the schools another month to submit their data if they were not able to or if they needed to make corrections.

So I think kind of two pieces, if they just simply could not submit either because it wasn't processing in time or it was in right now or anything, they can now submit, or even if they did submit, but they now need to make corrections they have until February 18th to do those corrections. One thing I wanted to point out here, there's kind of two pieces with the whole GE/FVT thing, the actual reporting for GE/FVT and then the completers list, which were just what schools were reviewing and then making corrections if needed.

So the completers list portion is done, that officially was done January 15th. There was no sort of an extension, there was no reopening related to the completers list. The completers list were final as of January 15th, whether a school corrected them or not, whether a school even reviewed them or not, those lists were final January 15th, and they expressed that that has already now been sent off to get income data on that. So no correcting your completers list anymore. Even if you make changes to enrollment data, it will not change your completers list at this point in time. And they also stated that schools should have received the final list, which shouldn't be a surprise to schools, they shouldn't be surprised on who's on the list since if they did make changes, it was based on their data that they made those changes, but they should have received those final completers lists to their SAIG mailbox, so schools should have those. And like I said, no more changing of the completers lists.

The other two things that came out of this EA that were important were that if a school is not able to get all of their reporting done by February 18th, they actually stated that they will be required to then submit that data in the next reporting cycle. I don't know, Jill, if I had missed this previously, but I had never seen them say that before, like, "If you missed the deadline, just submit it in the next one." I had not seen that. They did say it's not as simple as just submitting it in the next cycle, they will be required to submit an explanation to the department of why they were unable to meet the deadline. And that's really the only information we have on that at this point. They did say more information to come later, details about that process will come later. But an important piece to know if schools are unable to meet the deadline, they will still have to report that data, they're not off the hook for that data, it will just be the next reporting cycle.

And then I also talked about some common errors that schools were getting when they were submitting their reporting, and one was kind of a file level error, so when submitting it would cause that entire file to not be processed. And then one was more of an actual student and program level data issue that would just cause certain records to not be processed. So one was like the whole file got rejected, one was maybe there was some issues with certain records on a file. And I believe Beth in her statement last week had said that we're urging the department to now take this time to help solve those issues or give

some guidance to our members on how to resolve those issues because if they have another month, it's really not good if they don't know how to fix the issues. So we need some sort of guidance or help with our members be able to actually fix those errors if they are going to submit by February 18th now.

So that's a lot of information. What it all means is if a school submitted their data and they felt good about it and they made the deadline, they're done, they can be done, they don't need to do anything else. If they submitted but they know they need to correct data, they now have until the 18th to do that. Or if they were unable to submit, like I said, either because of the system or because of just not having enough time to actually get their reporting done, they now have until the 18th to do that.

Hugh Ferguson:

Awesome. Thank you so much for all those details, Sarah. And there's still a lot of developments to come on this with the new administration coming in and the new Congress starting that will also likely weigh in on this issue. We'll just have to wait and see what members start to talk about in terms of GE and FVT. But this is an issue we'll continue to monitor, and we know our members are very interested in these topics.

Sarah Austin:

Yes, absolutely. I think, like I said, this was kind of the topic that I heard the most chatter on Friday, but there were some different opinions here. People that truly were ready to submit their data, they were ready to go but maybe submitted it and it took so long to process that the deadline passed, they were happy, they now get this extension to get that data in. Other people were like, "Why say this after?" Because we heard from our members, especially with the holiday break, they were killing themselves, staying up all night, working weekends to get this done, and then it's open for another month. So I think there was some frustration there. And then also, of course, people still pushing for even further extension. So I've seen kind of a mixed bag of reactions to this, but I do think some schools were relieved and some were like, "I was done thinking about GE/FVT finally, and now I have to think about it for another month." So some disappointment from others.

Hugh Ferguson:

For sure, yeah. Thanks so much for those added comments, Sarah. I know we have a lot of Slacks blowing up, a lot of articles with comments and lots of opportunities for members to weigh in on things, and we really appreciate everyone's comments. And yeah, I think that's going to do it for us this week. But if listeners want to send us more comments on these issues, feel free to send those in through the show notes and we'll keep monitoring this and we will talk to you again real soon.