

**Attachment**  
**Follow Up to COHEAO Conference Call on**  
**New NSLDS Reporting Requirements**

**Academic Level Codes**

- 1) *Does the Department have plans to change the NSLDS Academic Level Codes to match the COD Grade Level Codes, or to otherwise change the NSLDS Academic Level Codes?*

No, the Department does not have any plans to change the NSLDS Academic Level Codes.

- 2) *Will the Department relax the edits for reporting academic level of Perkins borrowers until the schools have had time to develop computer systems that can report to NSLDS academic level for Perkins borrowers using the NSLDS code?*

The date of July 1, 2008 is still in effect, but the Department has relaxed the edits that will prevent the school/servicer from submitting an invalid academic level. If a school/servicer submits a valid Academic Level Code, the new edits will be applied. For loans submitted without valid Academic Level Codes, the Academic Level Code will be converted to "N" and edits that are applicable for pre-July 1, 2008 loans will be applied. Schools now have until October 1, 2008 to comply with the requirement of providing valid Academic Level Codes as listed in Table B-13. The new edits will be in effect for all loans submitted on or after October 1, 2008. Any Perkins Loan that does not meet all the edits for the new reporting requirements will be rejected.

**Certification Date and Date of First Disbursement for Assigned Loans**

- 1) *Does the Department delete date of first disbursement from NSLDS, or replace date of first disbursement with certification date, when loans are assigned?*

No. The Department makes no changes to the date of first disbursement that was originally reported to NSLDS.

- 2) *Does the Department's Debt Management and Collection System (DCMS) currently use date of first disbursement as a loan identifier for assigned Perkins Loans?*

Not currently. However, we plan to change reporting requirements to use date of first disbursement. The detailed instructions of the Federal Perkins Loan Program/NDSL Assignment Form (Form 553) will be modified to include the date of first disbursement in the Loan Information section.

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- 3) *When a school assigns several loans for one borrower at the same time, the school reports a single certification date for all of the borrower's loans. Does the Department advance the certification date by one day for each of a borrower's separate loans that are assigned at the same time?*

Yes. The data exchange process between DMCS and NSLDS matches on certification date, and advancing the certification date creates a unique identifier for each of a borrower's assigned loans.

- 4) *Will the Department eliminate the incremented certification date for Perkins assignments?*

Yes. Changes will be made to DMCS to capture the first disbursement date. After we've made these changes, there will be no need to advance the certification date to create a unique identifier for each of a borrower's loans.

- 5) *What procedures should schools and servicers use for assigning loans?*

Schools and servicers should continue to follow the current procedures for assignment until these changes have been made. Currently, schools are required to report date of first disbursement on the manifest attached to the assignment form. Date of first disbursement must match the date of first disbursement that was initially reported to NSLDS. For loans reported to NSLDS on or after July 1, 2008, each separate Perkins Loan a borrower receives will have a separate date of first disbursement.

### **Implementation Date**

- 1) *Will the Department postpone the effective date for the new requirements?*

No. With the exception noted above for reporting academic level, the new reporting requirements will go into effect on July 1, 2008.

- 2) *What will be the ramifications if a school is not able to comply with the new reporting requirements by July 1, 2008?*

The Department expects schools and servicers to meet the revised reporting requirements consistent with the appropriate effective dates. That said, with regard to any enforcement action, the Department will take into account the complexity of some of the required changes and the short timeframes allowed for some of them.