



March 26, 2014

Mr. James Runcie
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Mr. Runcie:

We write to you to express concern with the short and unrealistic time frame given to institutions to meet the NSLDS reporting requirements released by the Department of Education on February 27, 2014 and ask for an extension for institutions that are unable to meet those deadlines. Our institutions are committed to complying with the directives of the Moving Ahead for Progress in the 21st Century Act enacted in July of 2012 related to the 150% subsidized Direct Loan eligibility provisions, but there are a number of components that have created significant challenges for many of our institutions.

As you noted in your May 16, 2013 Electronic Announcement, in order to implement the final regulations, the Department needed to make significant changes to the Common Origination and Disbursement (COD) System, National Student Loan Data System (NSLDS), and Central Processing System (CPS). Similarly, in order for institutions to gain the capability to report in the new formats they also must make significant changes to their systems configurations and business processes. These process updates are commonly conducted through the National Student Clearinghouse (NSC) and facilitated by data extraction specifications that must be created by our student information system (SIS) providers such as Ellucian and Oracle/Peoplesoft.

NSC has been working diligently with our institutions to keep us apprised of their work and their communications with the Department in preparation for the final requirements, but they have been limited in their ability to create the new reporting format until the Department made the final requirements available. NSC just released the new file format to capture the new data element requirements and now it must be shared with our institutions and SIS providers to make modifications to accommodate the new reporting requirements.

While we know that all involved parties are working diligently to update these processes, it is unrealistic to expect this multilayered, multi-organizational process to be built, tested, corrected (as needed) and implemented as early as April 14 for some changes and July 1 for the remainder, given that the Department only provided specific requirements in February of 2014.

Our institutions have also raised questions about the definitions of new data elements such as “Program Enrollment Effective Date” and “Program Published Length.” A number of these new elements are departures from our current protocols and can potentially lead to interpretations that don’t meet the intention of the Department. Additional clarification of the definitions of the new data elements is necessary to ensure consistency in data reporting and forestall additional costly system changes in the future.

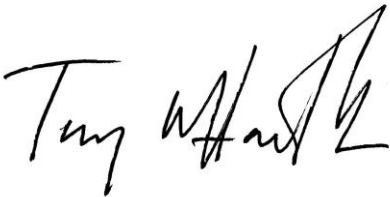
Given the short time frame between the release of the final NSLDS reporting requirements and the significant number of changes and information exchange the new NSLDS reporting requirements will entail among multiple entities, we ask the Department to extend the deadline for institutions to report in the new file formats. Our institutions will diligently work to meet these new directives but we believe the time frame provided is inadequate.

We would be happy to discuss our concerns with you and appreciate your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael V. Reilly". The signature is fluid and cursive, with a long, sweeping tail on the last name.

Michael V. Reilly
Executive Director
American Association of Collegiate Registrars and Admissions Officers

A handwritten signature in black ink, appearing to read "Terry W. Hartle". The signature is bold and cursive, with a prominent initial "T" and a long, horizontal stroke at the end.

Terry W. Hartle
Senior Vice President, Government Relations and Public Affairs
American Council on Education

A handwritten signature in black ink, appearing to read "Justin Draeger". The signature is cursive and somewhat stylized, with a long, horizontal stroke at the end.

Justin Draeger
President and CEO
National Association of Student Financial Aid Administrators