



National Student Clearinghouse

Audit Guide

How Institutions Use Clearinghouse Systems for Enrollment Status Compliance Reporting

Purpose

The National Student Clearinghouse's Audit Guide is designed to facilitate the audit process for schools using Clearinghouse services. It **helps auditors understand how your institution uses Clearinghouse services to complete its timely enrollment status and compliance reporting to the National Student Loan Data System (NSLDS) and student loan community.**

The Clearinghouse systems enable institutions to report their information to a trusted source who, in turn, reports the enrollment for compliance-related purposes on your behalf. The Clearinghouse acts as your agent in accordance with federal regulations. This guide is intended to supplement the audit guides provided by the Department of Education (ED) and the OMB Circular A-133 Compliance Supplement, as it relates to enrollment reporting. (Visit studentclearinghouse.org/about for information on the Clearinghouse, including who we are and what we do.)

This Audit Guide takes the auditor through Clearinghouse data flows, scheduling, suggested audit procedures, and helpful hints to use while performing your institution's annual compliance audit or Department of Education Program Review. You can download the Clearinghouse's most recent annual audit report at theclearinghouse.help/annualaudit.

This document is intended to supplement and clarify procedures during an audit, specific to enrollment status change information. It is not intended to override any academic or institutional policies nor any federal laws or regulations.

Understanding Your Clearinghouse Transmission Schedule

Your institution's Enrollment Reporting transmission schedule is the framework used to complete your timely compliance reporting. It also sets reporting expectations for the various departments within your institution, the Clearinghouse, and the student loan community, including the Department of Education's NSLDS.

Because each institution has different needs, the transmission schedule for each Clearinghouse participating institution is different. Typically, the transmission schedule comprises at least 12 transmissions per academic year. The recommended reporting frequency enables your institution to communicate enrollment status changes in a timely manner.

- Once your transmission has gone through our system validations, and you have corrected any error flags within the file, your enrollment information is loaded into the Clearinghouse database and processed.
- Your institution's enrollment information is then available for data flow to the student loan community, which is covered in detail later in this guide.
- This process enables NSLDS, guarantors, lenders, and servicers to obtain the most current enrollment information on students who are benefiting from federal financial aid and private student loans.

See our "Enrollment Reporting Data Flow" infographic at theclearinghouse.download/erdataflow.

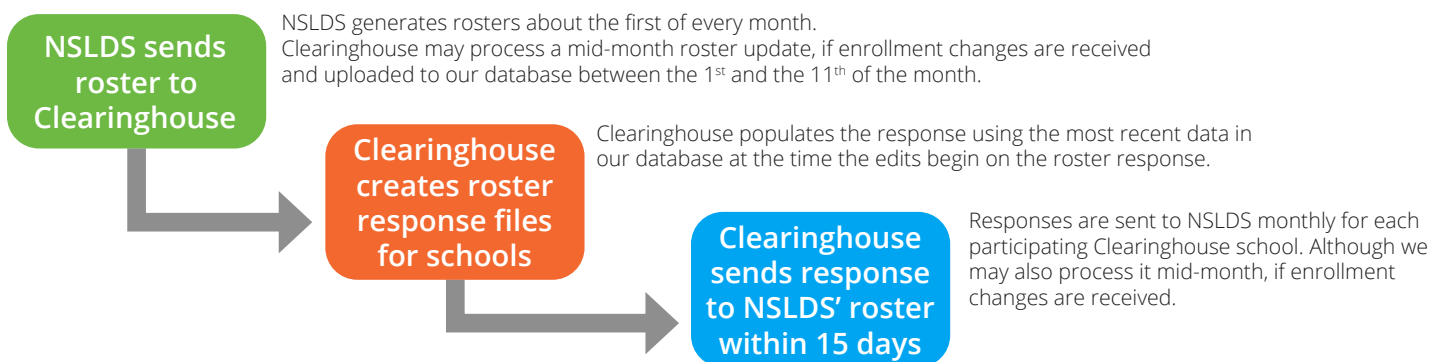
How Does the Clearinghouse Adhere to ED's "Enrollment Reporting for Student Aid Compliance" Requirements?

Clearinghouse data flows are in accordance with federal regulations, specifically 34 CFR 682.610 and 685.309. These regulations provide guidance to institutions on communicating enrollment status changes via the NSLDS Roster Distribution process, the Student Status Confirmation Report (aka SSCR roster). The Clearinghouse responds to rosters whenever we receive them from NSLDS.

Typically, NSLDS creates and sends a roster to the Clearinghouse on the first business day of each month of the year (January through December). The roster contains specific students at specific institutions who received Title IV Federal Financial Aid at your institution or an institution other than yours, as determined by NSLDS. As your institution's agent, the Clearinghouse responds to the roster with the current enrollment data points for the student in the Clearinghouse database, as provided by the institution. The Clearinghouse completes and returns the roster to NSLDS within 15 days of receipt, in accordance with DCL 14-07 (federal regulation(s) 34 CFR 682.610/685.309).

The Clearinghouse also sends enrollment status updates to non-Direct Loan entities in the lending community (i.e., guarantors, lenders, and servicers), which is prompted by our receipt of the institutions' data. Institutions schedule their data transmissions to the Clearinghouse based on their academic calendars, enabling students' enrollment status changes to be captured in compliance with 34 CFR 682.610 (c) (2) and 685.309 (b) (2).

Additionally, we send a weekly notification to Clearinghouse participating non-Direct Loan guarantors, lenders, and servicers. This notification is based on borrower lists provided by these entities, with new student enrollment data transmitted based on options the entity has selected. Within approximately one week of an institution's enrollment data being processed into the Clearinghouse database, the students' records are sent to these requesting guarantors, lenders, and servicers.



What Data Elements Are Reported to NSLDS and Non-Direct Loan Guarantors, Lenders, and Servicers?

NSLDS SSCR Data Flow

NSLDS sends rosters to the Clearinghouse and we respond with the following institution-specific data elements:

- Student's Social Security Number
- Student's Last Name
- Student's First Name
- Student's Middle Initial
- Student's Date of Birth
- Date of Anticipated Completion
- Student Enrollment Certification Date
- Term Begin and End Date
- Campus-Level Enrollment Status Code
- Campus-Level Enrollment Status Effective Date
- Most Recent Student Address (as provided by the institution)
- Program Begin Date
- Program CIP (Classification of Instructional Programs, see nces.ed.gov/ipeds/cipcode)
- Program Credential Level
- Program CIP Year
- Program Length

- Program Length Measurement
- Program Weeks in Title IV Academic Year (for program length measured in weeks or months)
- Program Enrollment Status Code
- Program Enrollment Status Effective Date

One or more programs can be reported per student.

Lending Community Data Flow

Institutions send enrollment information to the Clearinghouse and we send the following student-specific data elements to the student loan community:

- Office of Postsecondary Education Identifier (OPEID)
- Student's Social Security Number
- Student's Last Name
- Student's First Name
- Student's Middle Initial
- Anticipated Graduation Date
- Student Enrollment Certification Date
- Enrollment Status Code
- Enrollment Status Effective Date
- Most Recent Student Address (as provided by the institution)
- Term Begin and End Dates

Important! As specified in the Federal Regulations 34 CFR 682.610 and 685.309 and the NSLDS Enrollment Reporting Guide, enrollment status compliance reporting is met by reporting the student's enrollment status change within 60 days of determining the student's status has changed. Because Clearinghouse participating institutions expect to complete a roster to NSLDS at least every two months, institutions have 60 days to report enrollment status changes to NSLDS. When a status change is determined after it has occurred, compliance is based on the date the institution identifies the status change ("date of determination"). Accordingly, the applicable regulatory references are 34 CFR 682.605 and 34 CFR 668.22 (b) or (c).

Audit Procedures Checklist

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| <input type="checkbox"/> Create audit sample | <p>Typically, the audit sample is obtained from your student information system and comprises only students with disbursed and outstanding Title IV Federal Financial Aid, as determined by NSLDS.</p> |
| <input type="checkbox"/> Check your audit sample on the Clearinghouse secure site | <p>Log in to the Clearinghouse secure site at studentclearinghouse.org to review the records in your audit sample. Having a full picture of enrollment reporting for each student will help the auditor establish timely compliance reporting in accordance with federal regulations 34 CFR 682.610 and 685.309.
(Your institution's authorized staff can access our secure site.)</p> |
| <input type="checkbox"/> Review each student's enrollment history | <p>The enrollment history creates an event timeline that includes enrollment status, effective date of status change, and the date the institution reported the change.</p> <ol style="list-style-type: none"> 1. Under the "Student Look-Up" or "Student Reporting" tab, click the "Data Reporting Dashboard" link. 2. Click "Student Look-Up" in the left navigation menu. 3. Enter the student's Social Security number. 4. Click "Search." 5. Select "Enrollment History" to display the student's campus-level enrollment history and NSLDS SSCR history for enrollment reporting from the Clearinghouse to NSLDS. |
| <input type="checkbox"/> Establish the reporting timeline | <p>This timeline will reflect the enrollment reporting via the Clearinghouse to NSLDS. You should compare your institution's established "Date of Determination" date with the Clearinghouse's "Sent Date."</p> <p>Beginning with the date your school determined the student's enrollment status changed count the number of days to the date the certification of enrollment was sent from the Clearinghouse to the NSLDS. This will help demonstrate whether or not timely compliance reporting was completed within the federal guidelines, as noted in 34 CFR 682.610 and 685.309 and the NSLDS Enrollment Reporting Guide.*</p> |

*Please note: In some cases, the date your institution became aware of a status change (the date of determination) may be **different** than the status effective date. **Compliance is established based on date of determination.** The applicable federal regulations are 34 CFR 668.22, 682.610, 685.309 and/or 682.605.

Helpful Tips

On the Clearinghouse secure site www.studentclearinghouse.org

- Review the enrollment history to get a better understanding of the student's complete enrollment record.
- In some cases, the date your institution became aware of a status change (the date of determination) may differ from the enrollment status effective date. Compliance is established based on the date of determination. The applicable federal regulations are 34 CFR 668.22, 682.610, 685.309, and/or 682.605.
- If there appears to be no reporting to the NSLDS, **check that the student is benefiting from Title IV Federal Financial Aid** before proceeding.
- You should be aware of NSLDS's "continuous enrollment" guidance if your academic calendar has one or more non-required (non-compulsory) academic term payment periods or periods of enrollment. The applicable federal guidance explains compliant enrollment reporting expectations during non-required academic terms. For Clearinghouse Enrollment Reporting best practices for non-required terms, see theclearinghouse.download/ersummerflyer.

Review our audit resources, including FAQs, at theclearinghouse.help/audit.

On the NSLDS website fsapartners.ed.gov

- If you compare the information from the Clearinghouse secure site to NSLDS, ensure you are viewing all **Active and Inactive** records on the applicable NSLDS Campus Enrollment Details and Program Enrollment Details screens. Selecting this display option ensures the complete NSLDS reporting record is reflected for the student and enables timely status change reporting to be evaluated.
- On the Campus Enrollment Details and Program Enrollment Details screens, the term "School Batch" refers to enrollment reporting received via the Clearinghouse data flow to NSLDS.

If you have questions or need assistance, please visit
theclearinghouse.help/audit
or contact the Clearinghouse's Audit Resource Center at
auditresource@studentclearinghouse.org.



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