

# Cooley

## Challenges to Gainful Employment Student Completer Lists Due July 28

June 15, 2016

The US Department of Education has set the deadline for institutions to file corrections to their "student completer lists" as the next major step in ED's effort to publish the first set of rates under the Gainful Employment Rule. That deadline is July 28, 2016 at midnight, which appears to be consistent with ED's announced intent to issue the first set of final GE Rates in January 2017. These rates will represent ED's inaugural effort to measure the eligibility of individual educational programs based on a measure of their students' educational debt and post-graduation earnings.

Interestingly, ED chose to kick off the 45-day period for the GE completer list corrections on the same day that it offered its second webinar to train schools on the online methods and tools to make such corrections.

The GE completer lists were released on June 1, 2016 through institutions' Student Aid Internet Gateway ("SAIG") mailboxes. Institutions that did not have an SAIG mailbox and have not received their student completer lists should request the lists from the National Student Loan Data System ("NSLDS") as soon as possible. Institutions will submit their challenges to the completer lists through the GE tab on the [NSLDS Professional Access website](#). The NSLDS GE tab became accessible on June 13, 2016.

ED will hold one more repeat [webinar on June 16](#), 2016 providing further details on how institutions can submit corrections to their GE completer lists.

The completer lists for each GE educational program include all of the students who received Title IV federal student aid funds and completed that GE program at the institution in the 2010-2011 and 2011-2012 award years. For smaller programs, the completer lists may reach back further to include students who completed in the 2008-2009 and 2009-2010 award years. Institutions should carefully review their lists to ensure that ED has correctly identified the students who should be included or excluded from the cohorts that will be used to calculate their GE Rates.

Students should be excluded from the GE Rate calculations if they fall into one of the following categories:

- Enrolled in school during the earnings year (Calendar Year 2014),
- Loans in military-related deferment during earnings year (Calendar Year 2014),
- Death,
- Loans discharged because of total and permanent disability, or
- Undergraduate students subsequently completed a higher credentialed undergraduate GE program at the same institution; graduate students subsequently completed a higher credentialed graduate GE program at the same institution.

The released completer lists should already identify graduates who were excluded and the basis for that action. If institutions believe there are additional students who should be excluded or included, they must file their corrections by July 28, 2016. Institutions providing corrections must include an explanation in NSLDS of the reason a student should be included or excluded from the completer list and a description of what documentation the institution has to support the correction.<sup>1</sup> The school must maintain records of the supporting documentation. Although the evidence does not need to be submitted to ED at the time

corrections are made, ED may request to see the documents at a later date.

Following the submission of the completer lists corrections, ED must obtain the earnings and educational debt information for the students on the final lists to calculate the draft GE Rates. At that point, institutions will have an additional 45 days to challenge the debt amounts used in the draft rates. ED has not released any more detail about the timing for the draft rates and related corrections, but it has stated that it plans to complete the entire calculation process to issue the first set of official GE Rates in January 2017.

Please let us know if you need more information on the GE Rates or the next steps in the process for correcting GE-related data and calculating GE Rates.

#### Notes

1. [ED has provided a list](#) of acceptable and unacceptable explanations and supporting documentation regarding each type of exclusion and inclusion.

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