

## **NCHELP NSLDS Workgroup (NED)**

### **NSLDS Lender Manifest Reporting Standards to Accommodate HERA**

**Subject:** Reporting of Graduate Plus loans on NSLDS Lender Manifest.

The Higher Education Reconciliation Act of 2005 includes a change that expands the PLUS loan program to include graduate and professional students (Sec 428B 8005). The following standard has been determined by the NSLDS Workgroup for NSLDS Lender Manifest reporting to accommodate the reporting of the new Graduate Plus loan. The proposal was put out for public comment, and no objections were received. A few clarifications from the original proposal are noted below in *bold italics*.

- From a period of 08/01/06 to 04/30/07, Lenders and Lender Servicers have the option of reporting Graduate PLUS loans to GA's through NSLDS Lender Manifest in two ways.
  1. Report with a loan type of "GB".
    - Student SSN (Field 3) must be populated
    - Plus Borrower SSN (Field 5) may be populated with the same Student SSN as field 3 **OR** may be reported as spaces.
  2. Report with a loan type of "PL"
    - Both Student SSN (Field 3) and Plus Borrower SSN (Field 5) must be populated with the same value.
  
- Beginning 05/01/07
  1. Lenders and Lender Servicers must report Graduate PLUS loans with a loan type code of "GB".
    - Student SSN (Field 3) must be populated
    - Plus Borrower SSN (Field 5) may be populated with the same Student SSN as field 3 **OR** may be reported as spaces.

***Note: Lenders and Servicers are not expected to report differently for different guarantors. GA's are expected to accept a GB loan type with either PLUS Borrower SSN (Field 5) equal to the Student SSN field 3 or spaces.***

This will require Guaranty Agencies (GA's) to be able to accept either of the above reporting options by 08/01/06, or as close as possible. GA's that are unable to accommodate any of the above reporting options will need to work independently with their Lenders and Lender Servicers on a proprietary reporting option until they are able to accept incoming records this way.

#### **Reasons:**

**Report date of 08/01/06:** This is the earliest reporting date for which Graduate PLUS loans would need to be reported to the GA via NSLDS Lender Manifest.

***Note: Just to clarify, the 08/01/06 begin date corresponds to Lender Manifest files containing 07/31/06 month end balances.***

#### **Reporting Options:**

The Department of Education is requiring GA's to report Graduate PLUS loans with a "GB" loan type code, and spaces for the PLUS Borrower SSN beginning 07/01/06. Since NSLDS Lender Manifest was created to provide GA's with NSLDS needed information, it doesn't seem appropriate to require L/S's to report both PLUS Borrower and Student SSN fields if NSLDS is not requiring (or even allowing) GA's to report this way.

## **NCHelp NSLDS Workgroup (NED)**

### **NSLDS Lender Manifest Reporting Standards to Accommodate HERA**

It is our understanding that both CAM and CommonLine are adopting a standard to populate both the Student and PLUS Borrower SSN when reporting a "GB" loan type. It also doesn't seem appropriate to require L/S's to report only the Student SSN if the CAM standard is to require both Borrower and SSN fields. Since these fields are strictly used for matching purposes for NSLDS Lender Manifest (i.e., not the same potential of creating duplicate loans, etc. as there is with GA to NSLDS reporting) it should not be a huge burden on the GA's to be able to accept either way.

We believe we should provide the same contingency option of reporting these with the "PL" loan status code with both PLUS Borrower SSN and Student SSN required as ED is offering the GA's. The Department of Education indicated they would allow one year to implement changes. Technical Update GA-2006-02 was issued with a date of 04/26/06, therefore 05/01/07 is used as the cutoff for reporting the GB code on NSLDS Lender Manifest.

#### **Summary of Edit Changes:**

The edit changes can be found in the NCHelp e-Library. This can be found at the following link.

<http://www.nchelp.org/elibrary/index.cfm?parent=334>

The following update documents contain the edit changes.

*Note: These edit changes only reflect the permanent edit changes regarding the GB reporting. The temporary option of reporting a PL loan type is not included in the documentation.*

- Reject and Unreported Changes
- NSLDS Lender Manifest
- TABLE B
- TABLE E
- NSLDS Lender Manifest Common Edits

*Note: A complete update to the NSLDS Lender Manifest Documentation is pending.*

The edit and/or description changes are primarily on Fields 5 (PLUS BORROWER'S SSN) and Field 36 (DATE ENTERED REPAYMENT).

Table E Contains the new Military Operations Deferment code of "MO". No edit changes are required for this new code.

#### **NSLDS Lender Manifest Software:**

A new version of the NSLDS Lender Manifest is posted to the link above. This includes both a new installation version and an update version for those already using the software. The update version should be used so previous data will not be lost. This updated software only includes revisions to allow for the new GB loan type and MO deferment type code.