

# Challenge, Adjustment, and Appeal Tools

Chapter

4.11

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# Challenge, Adjustment, and Appeal Tools

## Which address does a school or data manager use for submitting challenge, adjustment, or appeal materials to Default Management?

A school or data manager should send challenge, adjustment, or appeal materials to Default Management via commercial courier or the U.S. Postal Service. Default Management will not accept any challenge, adjustment, or appeal correspondence by facsimile (fax) or email.

If sent by commercial overnight mail/courier delivery, the address is

U.S. Department of Education  
Default Management  
ATTN: (Insert type of challenge, adjustment, or appeal here)  
830 First Street, NE  
Washington, DC 20002

If sent by U.S. Postal Service, the address is

U.S. Department of Education  
Default Management  
ATTN: (Insert type of challenge, adjustment, or appeal)  
400 Maryland Avenue, SW  
Washington, DC 20202-5353

A school or data manager should not send challenge, adjustment, or appeal materials to any other addresses at the U.S. Department of Education (the Department).

Default Management recommends that all challenge, adjustment, or appeal correspondence be sent via return receipt requested or via overnight courier delivery. A school or data manager should maintain the documentation that verifies the receipt of the correspondence as well as all electronic and hardcopy documentation submitted as a part of the challenge, adjustment, or appeal process.

### **Incorrect Data Challenge, New Data Adjustment, and Erroneous Data Appeal Tools**

#### **What types of loan record detail report allegations may a school submit as a part of an incorrect data challenge, new data adjustment, or erroneous data appeal?**

When submitting an incorrect data challenge, new data adjustment, or erroneous data appeal, a school must submit allegations about the accuracy of the data used to calculate the school's cohort default rate. The allegations usually fall into three main categories:

- ❖ The school alleges that the loan record detail report incorrectly reports a data element and the data element should be changed (incorrectly reported).
- ❖ The school alleges that the loan record detail report incorrectly includes a borrower whose repayment date does not fall within the cohort fiscal year and the borrower should be removed from the cohort default rate calculation (incorrectly included).
- ❖ The school alleges that the loan record detail report incorrectly excludes a borrower who entered repayment within the cohort fiscal year and the borrower should be added to the cohort default rate calculation (incorrectly excluded).

#### **What supporting documentation does a school need to submit with its allegations?**

A school must submit documentation to support its allegations. Relevant supporting documentation includes, but is not limited to, the following:

- ❖ a copy of a letter to the relevant data manager that informs the entity of the borrower's last date of attendance or less-than-half-time date and proof that the documentation was timely sent to the data manager;
- ❖ a dated copy of a Student Status Confirmation Report (SSCR) that confirms the borrower's last date of attendance or less-than-half-time date and proof that the documentation was timely submitted;

- ❖ a screen print from the SSCR function within the National Student Loan Data System (NSLDS) that confirms the borrower's last date of attendance or less-than-half-time date was timely recorded within NSLDS; or
- ❖ a copy of a canceled check, front and back, or other documentation showing that the borrower's loan was fully refunded and canceled within 120 days of disbursement by the lender.

A school may contact the data manager for additional information on types of supporting documentation the school should submit to support an allegation. In addition to submitting documentation to support the allegation, the school must also submit proof that the supporting documentation was timely submitted to the data manager or NSLDS.

If the data a school submits was never originally submitted to the relevant data manager or NSLDS, or if the data was not submitted in a timely manner, the data manager should respond that the issue in question was determined based on the best information available at the time and that, as a result, no change is warranted for cohort default rate purposes.

#### **Does a school need to submit loan record detail report pages with its allegations?**

A school must always submit the appropriate pages of the loan record detail report to support its allegations. The school should include the loan record detail report page where the school is alleging the borrower data has been

- ❖ incorrectly reported,
- ❖ incorrectly included, or
- ❖ incorrectly excluded.

In certain circumstances the school must submit multiple loan record detail report pages from the same cohort fiscal year. If the borrower has multiple loans that appear on more than one page, the school should include each page where the borrower appears. If the borrower is missing from the cohort default rate calculation, and the missing borrower would have appeared at the bottom of one page or the top of the next page, the school should include both pages.

In other circumstances the school must submit loan record detail report pages from multiple cohort fiscal years. If the school alleges that a borrower was incorrectly reported in one cohort fiscal year and should have been reported in another cohort fiscal year, the school must include the relevant loan record detail report pages from both cohort fiscal years.

Finally, in some circumstances the school must submit pages from the loan record detail report for the draft cohort default rates and the loan record detail report for the official cohort default rates. If the school is alleging that the loan record detail report for the official cohort default rates contains new data, the school must show the page(s) from the loan record detail report for the draft cohort default rates where the borrower initially appeared or should have appeared and the page(s) from the loan record detail report for the official cohort default rates where the new data appears or should have appeared.

**What specific allegations and supporting documentation can a school submit?**

On the following pages are five charts that outline allegations a school might submit. The allegations listed in this section are common allegations; a school may submit an allegation not covered in this section.

To use the charts, read down the left-hand column named "Allegation." Once you find an allegation that is appropriate to your situation (if you are a representative of a school) or an allegation a school has submitted (if you are a representative of a data manager), read across the chart to find an explanation of the allegation and a listing of the documentation required to support the allegation.

Figure 4.11.1 outlines several situations where a school believes a borrower was incorrectly reported on a loan record detail report because of an incorrect date entered repayment. If the date were changed, the borrower would either remain in the current cohort fiscal year or move to a different cohort fiscal year. In all of these situations the school must provide proof of timely submission of any required documentation. The school should also provide loan record detail report pages from the cohort fiscal year where the borrower is included and/or excluded and, if applicable, loan record detail report pages from the cohort fiscal year where the school believes the borrower should be included.

**Figure 4.11.1**  
Borrower Incorrectly Reported Due to Inaccurate Date Entered Repayment

<b>Allegation</b>	<b>What does the school allege?</b>	<b>What is the school requesting?</b>	<b>What supporting documentation should the school enclose?</b>
Incorrect last date of attendance or less-than-half-time enrollment date	That the correct change in enrollment status was timely submitted to the data manager or NSLDS	That the date entered repayment be changed	Documentation of the enrollment status change
Unexpired grace period	That the borrower re-enrolled at least half-time at their school or another school before the grace period ended	That the date entered repayment be changed	Documentation of the enrollment status change
Death, disability, bankruptcy, or other type of discharge before expiration of grace period	That the loan was discharged before the borrower entered repayment	That the date entered repayment be changed to the date the loan was discharged	Documentation that the loan was discharged before the scheduled date entered repayment
Loan paid in full prior to expiration of grace period	That the loan was paid in full before the borrower entered repayment	That the date entered repayment be changed to the date the loan was paid in full	Documentation that the loan was paid in full before the scheduled date entered repayment
Repayment began before expiration of grace period	That the borrower began making scheduled loan payments before the expiration of the grace period	That the date entered repayment be changed to the date the borrower started repayment	Documentation showing that the borrower made a full scheduled payment before the scheduled date entered repayment
Federal SLS loan and Federal Stafford Loan not linked	That the borrower's Federal SLS loan and Federal Stafford Loan should be linked because the loans were obtained during the same period of continuous enrollment	That the date entered repayment be changed so that the Federal SLS loan and Federal Stafford Loan are linked in the same cohort default rate calculation	Documentation showing that the loans were obtained in the same period of continuous enrollment

Figure 4.11.2 outlines several situations where a school believes a borrower was incorrectly reported in default on a loan record detail report. If the default were removed, the borrower would be removed from the numerator of the cohort default rate calculation and would remain only in the denominator of the cohort default rate calculation. In all of these situations the school must provide proof of timely submission of any required documentation. The school should also provide loan record detail report pages from the cohort fiscal year where the borrower is incorrectly reported in default.

**Figure 4.11.2**

Borrower Incorrectly Reported Due To Inaccurate Default Status

Allegation	What does the school allege?	What supporting documentation should the school enclose?
Insufficient delinquency period	That the borrower did not receive the entire pre-default delinquency period	The delinquency report from the data manager demonstrating the actual delinquency period
In-school deferment	That the borrower received an in-school deferment and did not default during the cohort default period	The in-school deferment documentation
Forbearance	That the borrower received a forbearance and did not default during the cohort default period	The forbearance documentation
Death, disability, bankruptcy, or other type of loan discharge before default occurred	That the loan was discharged before the borrower defaulted during the cohort default period	Documentation that the loan was discharged before the default
Loan was repurchased and no subsequent claim paid	That the lender repurchased the loan due to incorrect claim submission and no subsequent default claim was paid on the loan during the cohort default period  (Note: Repurchases due to courtesy or a new repayment plan will not remove the loan from default in the cohort default rate calculation)	The delinquency report from the data manager
Rehabilitation achieved	That the borrower successfully rehabilitated the loan for cohort default rate purposes	The borrower's repayment record from the servicer
Loan did not default for cohort default rate purposes	Loan did not default or loan did not default during the cohort default period	The borrower's repayment record from the servicer or the delinquency report from the data manager demonstrating the actual delinquency period

Figure 4.11.3 outlines three situations where a school believes a borrower is incorrectly reported on a loan record detail report because the borrower has multiple loans. In all of these situations the school must provide proof of timely submission of any required documentation.

**Figure 4.11.3**  
Borrower Incorrectly Reported Due To Multiple Loan Allegations

<b>Allegation</b>	<b>What does the school allege?</b>	<b>What is the school requesting?</b>	<b>What supporting documentation should the school enclose?</b>	<b>Which loan record detail report pages should the school enclose?</b>
Wrong social security number – borrower is counted more than once in a cohort default rate calculation	That the borrower has been included more than once in the cohort default rate calculation because of two different social security numbers	The removal of the incorrect social security number and removal of the data if the loan is duplicated or the addition of the data under the correct social security number if the loan is not a duplicated loan	Documentation of the correct social security number	The pages from the cohort fiscal years where the borrower has been included under each social security number
Borrower has multiple loans in one cohort default rate calculation that belong in several cohort default rate calculations	That the borrower had one or more breaks in enrollment and used the entire grace period before obtaining more loans	A change to the date entered repayment and the removal of one or more loans from the same cohort fiscal year and the addition of those loans to the correct cohort fiscal year	Documentation of the enrollment status change	The pages from the cohort fiscal year where the borrower is included and, if applicable, the cohort fiscal year where the borrower should be included
Borrower has multiple loans that should be included in only one cohort default rate calculation	That the borrower was continuously enrolled at least half-time and did not use the entire grace period	A change to the date entered repayment and that all loans be moved to the correct cohort fiscal year	Documentation of the enrollment status history	The pages from the cohort fiscal year where the borrower is included and, if applicable, the cohort fiscal year where the borrower should be included

Figure 4.11.4 outlines two situations where a school believes a borrower was incorrectly included on a loan record detail report. If the allegation were upheld, the borrower would be removed from the numerator and denominator of the cohort default rate calculation. In both of these situations the school must provide proof of timely submission of any required documentation. The school should also provide loan record detail report pages from the cohort fiscal year where the borrower is incorrectly included.

**Figure 4.11.4**

Borrower Incorrectly Included Allegations

Allegation	What does the school allege?	What supporting documentation should the school enclose?
Loan fully cancelled	That the loan was fully cancelled within 120 days of disbursement (partially cancelled loans are included in the cohort default rate calculation)	Copies of the front and back of the cancelled check or documentation of an electronic funds transfer
Loan does not meet insurance requirements	That the lender did not meet the insurance requirements and the loan became an uninsured loan	Information from the data manager that the loan was repurchased by the lender

Figure 4.11.5 outlines a situation where a school believes a borrower was incorrectly excluded on a loan record detail report because of an incorrect date entered repayment. If the date entered repayment were changed, the borrower would be included in the cohort default rate calculation. The school must provide proof of timely submission of any required documentation. The school should also provide loan record detail report pages from the cohort fiscal year where the borrower is incorrectly excluded.

**Figure 4.11.5**

Borrower Incorrectly Excluded Allegation

Allegation	What does the school allege?	What supporting documentation should the school enclose?
Incorrect last date of attendance or less-than-half-time enrollment date	That the correct enrollment status information was timely submitted to the data manager or NSLDS	Documentation of the enrollment status change

There is one special allegation in which a non-degree-granting proprietary school believes that the cohort default rate calculation incorrectly includes a Direct Loan in default under other specified conditions. The school should ask the Direct Loan servicer to verify that the criteria for including the loan as defaulted have been met. If the Direct Loan servicer concludes that the loan's status has been determined accurately, and the loan meets the criteria to be counted as a defaulted loan, the Direct Loan servicer will send the school the repayment record for the loan. The school then reviews that record and, if it disagrees or questions the determination, the school may request clarification from the Direct Loan servicer within 15 calendar days. The Direct Loan Servicer then has 20 calendar days to respond to the school. If the Direct Loan servicer believes the loan's status has been determined incorrectly and agrees to remove the borrower from the numerator of the cohort default rate calculation, the Direct Loan servicer will not send repayment information to the school.

## Spreadsheet Tools

### General Spreadsheet Information

This chapter contains instructions for creating and completing the spreadsheets used when a school is submitting or a data manager is responding to challenges, adjustments, and appeals. Where possible, instructions for similar spreadsheets have been combined. There is a reduced version of a blank spreadsheet with each set of instructions. The spreadsheets should be created in landscape format using a spreadsheet software application such as Excel or Lotus 1-2-3. After creating the spreadsheet electronically, a school or data manager should save a blank copy of the electronic spreadsheet as a template for future use. The template should be updated if Default Management issues updates to the spreadsheets. The school or data manager should then complete the spreadsheet.

There are several things a school or data manager should do when creating and completing a spreadsheet. They include

- ❖ entering Social Security Numbers (SSNs) in a 000-00-0000 format;
- ❖ entering names in a Last Name, First Name format;
- ❖ entering dates in a MM/DD/CCYY format where M is month, D is Day, C is century, and Y is year;
- ❖ using the loan type codes from Figure 2.3.6 in Chapter 2.3, "Loan Record Detail Report;"
- ❖ entering data according to the school's records (when a school completes the spreadsheets) or entering data according to the data manager's records (when a data manager completes the spreadsheets) or the loan record detail report (if that data is accurate); and
- ❖ entering multiple loans of the same type with the same data on the same line and multiple loans of different types or with different data on separate lines.

Left-side Header Titles:

Type:  
 Cohort FY:  
 From:  
   Code:  
 To:  
   Code:

When completing the left-side header titles, the following information is requested:

- Type:** Enter the type of challenge, adjustment, or appeal being submitted.
- Cohort FY:** Enter the cohort fiscal year submitted.
- From:** Enter the entity completing the spreadsheet, either a school or a data manager.
- Code:** Enter the appropriate code for the entity completing the spreadsheet, either the OPE ID for a school or the data manager code for a data manager.
- To:** Enter the entity to which the spreadsheet will be submitted, either a school, a data manager, an independent auditor, or Default Management.
- Code:** Enter the appropriate code for the entity to which the spreadsheet will be submitted, either the OPE ID for a school, the data manager code for a data manager, or N/A (not applicable) for Default Management or an independent auditor.

There are also several optional things that can be done when creating and completing the spreadsheet to make the spreadsheet easier to read. They include

- ❖ bolding the spreadsheet titles,
- ❖ centering and bolding the column titles,
- ❖ making sure the columns are wide enough to fit all text,
- ❖ adding borders to the cells,
- ❖ repeating the information in the column headings at the top of each page (most software packages can do this automatically—check the software package’s help function for assistance),
- ❖ sorting the spreadsheet by SSN or Last Name,
- ❖ printing a test copy to review for readability (a school or data manager may need to insert several lines prior to Row 1 in order to create sufficient space between the header and the spreadsheet), and
- ❖ setting up automatic pagination so that the specific page number and the total number of pages show in the footer on each page.

After the spreadsheet is created and completed, the spreadsheet should be printed on 8 1/2" x 11" paper in a landscape layout. The spreadsheet should be saved so it can be used again later in the process. For example, by cutting and pasting, a school could reuse an incorrect data challenge spreadsheet as an uncorrected data adjustment spreadsheet or an erroneous data appeal spreadsheet.

You should note that some spreadsheet programs limit the amount of information that can be placed in a header. If you get an error message that states the header has exceeded the maximum space limit, try abbreviating some of the titles in the header. As an alternative, you can list some of the titles in the first few lines of the spreadsheets instead of in the header. However, if you list titles in the first few lines of the spreadsheet, make sure you set the spreadsheet program to repeat those lines on all of the pages of the spreadsheet.

There are also full-sized blank spreadsheets at the end of this chapter. A school or data manager may photocopy and use the full-sized blank spreadsheets instead of creating their own spreadsheets. If a school or data manager photocopies and uses the full-sized blank spreadsheet, they should remember to return the full-sized blank spreadsheet to this chapter of the Guide. They should also remember to circle the appropriate titles on the spreadsheet, since many of the spreadsheets are designed to be multi-purpose, covering several different challenge, adjustment, or appeal types.

A school or data manager may also obtain electronic templates of the spreadsheets from Default Management. Contact Default Management at 1-202-708-6048 for additional information.

After the spreadsheet is completed, it should be sent to the appropriate location (for a school, this will be to a data manager, an independent auditor, or Default Management; for a data manager, this will be a school or Default Management) along with the other challenge, adjustment, or appeal materials.

Although a school is required to submit a hardcopy of a spreadsheet to a data manager, some data managers may be willing to accept an electronic copy of a spreadsheet in addition to the hardcopy of a spreadsheet. Submitting an electronic copy in addition to the hardcopy may speed processing. A school should contact the relevant data manager to see if the data manager will accept an electronic copy in addition to the hardcopy.

**Figure 4.11.6**

Blank Incorrect Data Challenge/New Data Adjustment/Erroneous Data Appeal Spreadsheet

**Incorrect Data Challenge / New Data Adjustment / Erroneous Data Appeal Spreadsheet Instructions**

Figure 4.11.6 is an example of a blank incorrect data challenge/new data adjustment/erroneous data appeal spreadsheet that can be used by either a data manager or a school.

Type:		Number of Borrowers:	
Cohort FY:		Number of Loans:	
From:			
Code:			
To:			
Code:			

  

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Borrower's SSN</b>	<b>Borrower's Name</b>	<b>Type of Loans</b>	<b>Number of Loans</b>	<b>Basis of Alleged Error</b>	<b>Earlier of LDA or LTH</b>	<b>Date Entered Repayment</b>	<b>CPD, DD, ICRD, or N/A</b>	<b>Cohort FY(s)</b>	<b>Effect on Calculation</b>	<b>Comments</b>	<b>Agree/Disagree</b>	<b>Data Manager Code</b>
2													
3													

Date \_\_/\_\_/\_\_\_\_ Page \_\_ of \_\_

Left-side Header Titles:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

❖ **Left-side Header:** Enter the titles shown in Figure 4.11.6. After each title, enter the information appropriate to that title.

❖ **Right-side Header:** Enter the titles shown in Figure 4.11.6. After each title, enter the information appropriate to that title. The information cannot be entered until the remainder of the spreadsheet is created and completed. After "Number of Borrowers:" enter the borrowers from Column A. Do not count a borrower more than once. After "Number of Loans:" enter the total loans from Column D.

Right-side Header Titles:

Number of Borrowers:  
Number of Loans:

❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

Use for:

Incorrect Data Challenge

- School to Data Manager
- Data Manager to School

New Data Adjustment

- School to Data Manager
- Data Manager to School

Erroneous Data Appeal

- School to Data Manager
- Data Manager to School
- School to Default Management

For each Column A through M, on Row 1 enter the title as shown in Figure 4.11.6. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Borrower's SSN:** Enter the SSNs of all the borrowers.
- ❖ **Column B, Borrower's Name:** Enter the names of the individuals whose SSNs are listed in Column A.
- ❖ **Column C, Type of Loan:** Enter the code for the loan.
- ❖ **Column D, Number of Loans:** Enter the number of loans the borrower received for the loan type listed in Column C for that data manager.

- ❖ **Column E, Basis of Alleged Error:** Enter “Disputed” if the errors are alleged on the basis of disputed data or “New” if the errors are alleged on the basis of new data. Include this column only when creating an erroneous data appeal spreadsheet.
- ❖ **Column F, Earlier of LDA or LTH:** Enter the earlier of the student’s last date of attendance (LDA) or the date the student dropped below half-time enrollment (LTH) based on the school’s records (if a school is completing the spreadsheet) or the data manager’s records (if the data manager is completing the spreadsheet) for each borrower listed in Column A.
- ❖ **Column G, Date Entered Repayment:** Enter the date the loan entered repayment (DER) based on the school’s records or the data manager’s records for each borrower listed in Column A.
- ❖ **Column H, CPD, DD, ICRD, or N/A:** Enter the CPD (claim paid date), DD (default date), or ICRD (Income Contingent Repayment date), or enter “N/A” if the loan has not defaulted, based on the school’s records or the data manager’s records for each borrower listed in Column A.
- ❖ **Column I, Cohort FY(s):** Enter the cohort fiscal year(s) of the cohort default rate(s) which may be changed as a result of the data correction.
- ❖ **Column J, Effect on Calculation:** Enter N (numerator), D (denominator), or B (both numerator and denominator), accompanied by a plus or minus sign (such as +D or –D) to show how the school or the data manager believes the information will affect the cohort default rate calculation.
- ❖ **Column K, Comments:** Enter any comments. A data manager should make a comment to identify why the data manager agreed or disagreed. The data manager should also provide documentation to support the data manager’s determination.
- ❖ **Column L, Agree/Disagree:** A data manager should enter “agree” or “disagree” depending on whether the data manager agrees or disagrees with the school’s allegation. This column will be completed only by data managers.
- ❖ **Column M, Data Manager Code:** Enter the code for the data manager that sent the letters listed in Column D. Include this column when creating an erroneous data spreadsheet to Default Management.

**Figure 4.11.7**

**Blank Participation Rate Index Spreadsheet**

**Participation Rate Index Spreadsheet Instructions**

Figure 4.11.7 is an example of a blank participation rate index spreadsheet.

Type:		Cohort Default Rate:	
Cohort FY:		12-Month Period:	
From:		Total Borrowers:	
Code:		Total Regular Students:	
To:		PRI:	
Code:			

  

	A	B	C	D	E
	<b>Student's SSN</b>	<b>Student's Name</b>	<b>Student's Enrollment Dates</b>	<b>Loan Type (if any)</b>	<b>Loan Period</b>
1					
2					
3					
4					
5					
6					

Date \_\_\_/\_\_\_/\_\_\_ Page \_\_\_ of \_\_\_

Left-side Header Titles:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

❖ **Left-side Header:** Enter the titles shown in Figure 4.11.7. After each title, enter the information appropriate to that title.

❖ **Right-side Header:** Enter the titles shown in Figure 4.11.7. After each title, enter the information appropriate to that title. After "Cohort Default Rate" enter the cohort default rate used in the participation rate index challenge or the participation rate index appeal. After "12-Month Period" enter the selected 12-month period. The information in the next three lines cannot be entered until the remainder of the spreadsheet is created and completed. After "Total Borrowers:" enter the borrowers from Column D. After "Total Regular Students:" enter the total students from Column A. After "PRI:" enter the participation rate index. Calculate the participation rate index by dividing the total borrowers by the total regular students and multiplying the result by the cohort default rate.

Right-side Header Titles:

Cohort Default Rate:  
12-Month Period:  
Total Borrowers:  
Total Regular Students:  
PRI:

Use for:

- [Participation Rate Index Challenge](#)  
• School to Default Management
- [Participation Rate Index Appeal](#)  
• School to Default Management

❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

For each Column A through E, on Row 1 enter the title as shown in Figure 4.11.7. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Student's SSN:** Enter the SSNs of all the regular students enrolled on at least a half-time basis during any part of the selected 12-month period. These are the students who will be counted in the denominator of the participation rate index.
- ❖ **Column B, Student's Name:** Enter the names of the students whose SSNs are listed in Column A.
- ❖ **Column C, Student's Enrollment Dates:** Enter the student's beginning enrollment date and ending enrollment date.
- ❖ **Column D, Loan Type (if any):** Enter the type of loan (FFEL or DL) for those students in Column A who received loans with a loan period that overlaps the selected 12-month period. Enter "No" if the student did not receive a loan or the loan period does not overlap the 12-month period. These are the borrowers who will be included in the numerator of the participation rate index.
- ❖ **Column E, Loan Period:** Enter the beginning date and ending date of the loan period. If Column D is marked "No," enter "N/A." If the borrower has more than one loan, list the loan periods associated with each loan. However, the borrower is only counted once in the participation rate index calculation.

**Figure 4.11.8**

Blank Uncorrected Data Adjustment/New Data Adjustment Spreadsheet

**Uncorrected Data Adjustment / New Data Adjustment Spreadsheet Instructions**

Figure 4.11.8 is an example of a blank uncorrected data adjustment/new data adjustment spreadsheet.

Type: \_\_\_\_\_

Cohort FY: \_\_\_\_\_

From: \_\_\_\_\_

Code: \_\_\_\_\_

To: \_\_\_\_\_

Code: \_\_\_\_\_

Number of Borrowers: \_\_\_\_\_

Number of Loans: \_\_\_\_\_

	A	B	C	D	E	F
1	Borrower's SSN	Borrower's Name	Type of Loans	Number of Loans	Date Data Manager Agreed	Data Manager Code
2						
3						
4						
5						
6						

Date \_\_\_/\_\_\_/\_\_\_

Page \_\_\_ of \_\_\_

Left-side Header Titles:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

Right-side Header Titles:

Number of Borrowers:  
Number of Loans:

Use for:

Uncorrected Data Adjustment  
• School to Default Management

New Data Adjustment  
• School to Default Management

- ❖ **Left-side Header:** Enter the titles shown in Figure 4.11.8. After each title, enter the information appropriate to that title.
- ❖ **Right-side Header:** Enter the titles shown in Figure 4.11.8. After each title, enter the information appropriate to that title. The information cannot be entered until the remainder of the spreadsheet is created and completed. After “Number of Borrowers:” enter the borrowers from Column A. Do not count a borrower more than once. After “Number of Loans:” enter the total loans from Column D.
- ❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

For each Column A through F, on Row 1 enter the title as shown in Figure 4.11.8. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Borrower's SSN:** Enter the SSNs of all the borrowers for whom the school is requesting an adjustment.
- ❖ **Column B, Borrower's Name:** Enter the names of the individuals whose SSNs are listed in Column A.
- ❖ **Column C, Type of Loans:** Enter the code for the loan.
- ❖ **Column D, Number of Loans:** Enter the number of loans the borrower received for the loan type listed in Column C for that data manager.
- ❖ **Column E, Date Data Manager Agreed:** For each borrower in Column A, enter the date of the data manager response letter from the Incorrect Data Challenge for an uncorrected data adjustment spreadsheet or for the new data adjustment allegations response for a new data adjustment spreadsheet.
- ❖ **Column F, Data Manager Code:** Enter the code for the data manager that sent the response letters listed in Column E.

### Loan Servicing Appeal Spreadsheet Instructions

**Figure 4.11.9**

Blank Loan Servicing Appeal Spreadsheet

Figure 4.11.9 is an example of a blank loan servicing appeal spreadsheet that can be used by either a data manager or a school.

Type: _____										Number of Borrowers: _____					
Cohort FY: _____										Number of Loans: _____					
From: _____															
Code: _____															
To: _____															
Code: _____															
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	Borrower's SSN	Borrower's Name	Type of Defaulted Loans	Number of Defaulted Loans	Payment Made?	Date Letter Sent	Date Call Attempted	Date Pre-Claims Assistance Requested	Date Final Demand Letter Sent	Address Known?	Date of Skip Tracing Activity	Illegible Record?	Missing Record?	Improperly Serviced?	Data Manager Code
2															
3															

Date \_\_/\_\_/\_\_\_\_ Page \_\_ of \_\_

**Left-side Header Titles:**

Type: \_\_\_\_\_  
 Cohort FY: \_\_\_\_\_  
 From: \_\_\_\_\_  
 Code: \_\_\_\_\_  
 To: \_\_\_\_\_  
 Code: \_\_\_\_\_

**Right-side Header Titles:**

Number of Borrowers: \_\_\_\_\_  
 Number of Loans: \_\_\_\_\_

**Use for:**

- Loan Servicing Appeal
- Data Manager to School
  - School to Default Management

- ❖ **Left-side Header:** Enter the titles shown in Figure 4.11.9. After each title, enter the information appropriate to that title.
- ❖ **Right-side Header:** Enter the titles shown in Figure 4.11.9. After each title, enter the information appropriate to that title. The information cannot be entered until the remainder of the spreadsheet is created and completed. After "Number of Borrowers:" enter the borrowers from Column A. Do not count a borrower more than once. After "Number of Loans:" enter the total loans from Column D.
- ❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

For each Column A through O, on Row 1 enter the title as shown in Figure 4.11.9. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Borrower's SSN:** Enter the SSNs of all the borrowers in the sample.
- ❖ **Column B, Borrower's Name:** Enter the names of the individuals whose SSNs are listed in Column A.
- ❖ **Column C, Type of Defaulted Loans:** Enter the code for the loan.
- ❖ **Column D, Number of Defaulted Loans:** Enter the number of loans the borrower received for the loan type listed in Column C for that data manager.

- ❖ **Column E, *Payment Made?***: Enter "Yes" or "No."
- ❖ **Column F, *Date Letter Sent***: Enter the date a letter other than the final demand letter was sent. If no letter other than the final demand letter was sent, enter "No."
- ❖ **Column G, *Date Call Attempted***: Enter the date an attempt was made to contact the borrower by telephone. If no telephone call was attempted, enter "No."
- ❖ **Column H, *Date Pre-Claims Assistance Requested***: Enter the date pre-claims assistance was requested. If pre-claims assistance was not requested, enter "No." If the loan is a Direct Loan, enter "N/A."
- ❖ **Column I, *Date Final Demand Letter Sent***: Enter the date the final demand letter was sent. If no final demand letter was sent, enter "No."
- ❖ **Column J, *Address Known?***: Enter "Yes" or "No."
- ❖ **Column K, *Date of Skip Tracing Activity***: Enter the date the skip tracing took place if the borrower's address was unknown. If skip tracing did not take place or skip tracing was not required, enter "No." If the borrower's address was known, enter "N/A."
- ❖ **Column L, *Illegible Record?***: Enter "Yes" if the loan servicing record the data manager provided was illegible. If the loan servicing record was legible, enter "No."
- ❖ **Column M, *Missing Record?***: Enter "Yes" if the data manager failed to provide a loan servicing record. If the data manager provided a loan servicing record, enter "No."
- ❖ **Column N, *Improperly Serviced?***: Enter "Yes" for each loan that is improperly serviced for cohort default rate purposes. See the definition of improperly serviced in Chapter 4.6, "Loan Servicing Appeal." If a loan is properly serviced for cohort default rate purposes, it should be deleted from the spreadsheet and should not be sent to Default Management for review.
- ❖ **Column O, *Data Manager Code***: Enter the code for the data manager that sent the letters listed in Column F. This column should only be included when completing a school loan servicing appeal spreadsheet to Default Management.

**Low Income Rate Spreadsheet Instructions**

**Figure 4.11.10**

Blank Low Income Rate Spreadsheet

Figure 4.11.10 is an example of a blank low income rate spreadsheet.

Type:					12-Month Period:	
Cohort FY:					Award Years:	
From:					Calendar Years:	
Code:					Low Income Students:	
To:					Total Students:	
Code:					Low Income Rate:	

  

	A	B	C	D	E	F
	<b>Student's SSN</b>	<b>Student's Name</b>	<b>Student's Enrollment Dates</b>	<b>Economically Disadvantaged</b>	<b>EFC and Award Year</b>	<b>AGI, Family Size, and Calendar Year</b>
1						
2						
3						
4						
5						
6						

Date \_\_/\_\_/\_\_\_\_ Page \_\_ of \_\_

Left-side Header Titles:

Type:  
 Cohort FY:  
 From:  
 Code:  
 To:  
 Code:

Right-side Header Titles:

12-Month Period:  
 Award Years:  
 Calendar Years:  
 Low Income Students:  
 Total Students:  
 Low Income Rate:

Use for:

- Economically Disadvantaged Appeal
- School to Independent Auditor
  - School to Default Management

- ❖ **Left-side Header:** Enter the titles shown in Figure 4.11.10. After each title, enter the information appropriate to that title.
- ❖ **Right-side Header:** Enter the titles shown in Figure 4.11.10. After each title, enter the information appropriate to that title. After "12-Month Period:" enter the selected 12-month period. After "Award Years:" enter the award years coinciding with the 12-month period. After "Calendar Years:" enter the calendar years coinciding with the 12-month period. The information in the next three lines cannot be entered until the remainder of the spreadsheet is created and completed. After "Low Income Students:" enter the students from Column D. After "Total Students:" enter the students from Column A. After "Low Income Rate:" enter the low income rate. Calculate the low income rate by dividing the low income students by the total students.
- ❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

For each Column A through F, on Row 1 enter the title as shown in Figure 4.11.10. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Student's SSN:** Enter the SSNs of all the students enrolled on at least a half-time basis in a Title IV eligible program during any part of the selected 12-month period. These are the students who will be counted in the denominator of the low income rate calculation.
- ❖ **Column B, Student's Name:** Enter the names of the students whose SSNs are listed in Column A.
- ❖ **Column C, Student's Enrollment Dates:** Enter the student's beginning enrollment date and ending enrollment date.
- ❖ **Column D, Economically Disadvantaged:** Enter "Yes" if the student meets the criteria for low income outlined in the section of Chapter 4.7, "Economically Disadvantaged Appeal," entitled "How does a school calculate its low income rate?" If the student is not considered low income, enter "No." These are the students who will be counted in the numerator of the low income rate calculation.
- ❖ **Column E, EFC and Award Year:** Enter the student's EFC and the applicable award year if the student is considered low income because of his or her EFC. Enter the information in the following format: EFC/Award Year. If Column D is marked "No," enter "N/A." If the student is considered low income because of his or her AGI, enter "N/A."
- ❖ **Column F, AGI, Family Size, and Calendar Year:** Enter the student's AGI, family size, and the applicable calendar year if the student is considered low income because of his or her AGI. Enter the information in the following format: AGI/Family Size/Calendar Year. If Column D is marked "No," enter "N/A." If the student is considered low income because of his or her EFC, enter "N/A."

**Figure 4.11.11**

Blank Placement Rate Spreadsheet

**Placement Rate Spreadsheet Instructions**

Figure 4.11.11 is an example of a blank placement rate spreadsheet.

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

12-Month Period:  
Placed Students:  
Total Students:  
Placement Rate:

	A	B	C	D	E	F	G	H	I
	Student's SSN	Student's Name	Student's Scheduled Completion Date	Student's Enrollment Dates	Student's Program of Study	Student Placed	Student's Employment Dates	Student's Job Description	Student's Employer: Name, Address and Phone
1									
2									
3									
4									
5									
6									

Date \_\_\_/\_\_\_/\_\_\_

Page \_\_\_ of \_\_\_

Left-side Header Titles:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

Right-side Header Titles:

12-Month Period:  
Placed Students:  
Total Students:  
Placement Rate:

Use for:

Economically Disadvantaged Appeal

- School to Independent Auditor
- School to Default Management

- ❖ **Left-side Header:** Enter the titles shown in Figure 4.11.11. After each title, enter the information appropriate to that title.
- ❖ **Right-side Header:** Enter the titles shown in Figure 4.11.11. After each title, enter the information appropriate to that title. After "12-Month Period" enter the selected 12-month period. The information in the next three lines cannot be entered until the remainder of the spreadsheet is created and completed. After "Placed Students" enter the students from Column F. After "Total Students" enter the students from Column A. After "Placement Rate:" enter the placement rate. Calculate the placement rate by dividing the placed students by the total students.
- ❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

For each Column A through I, on Row 1 enter the title as shown in Figure 4.11.11. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Student's SSN:** Make an entry for each student who meets the criteria for inclusion outlined in the section of Chapter 4.7, "Economically Disadvantaged Appeal," entitled "How does a non-degree granting school calculate its placement rate?" These are the students who will be counted in the denominator of the placement rate calculation.
- ❖ **Column B, Student's Name:** Enter the names of the students whose SSNs are listed in Column A.
- ❖ **Column C, Student's Scheduled Completion Date:** Enter the student's scheduled completion date.
- ❖ **Column D, Student's Enrollment Dates:** Enter the student's beginning enrollment date and ending enrollment date.
- ❖ **Column E, Student's Program of Study:** Enter the student's program of study. Do not use abbreviations.
- ❖ **Column F, Student Placed:** Enter "Yes" if the student meets the criteria for placement outlined in the section of Chapter 4.7, "Economically Disadvantaged Appeal," entitled "How does a non-degree-granting school calculate its placement rate?" If the student does not meet these criteria, enter "No." These are the students who will be counted in the numerator of the placement rate calculation.
- ❖ **Column G, Student's Employment Dates:** For every student with a "Yes" in Column F, enter the student's beginning employment date and ending employment date. If the student is still employed, enter "present" as the student's ending employment date. If there is a "No" in Column F, enter "N/A."
- ❖ **Column H, Student's Job Description:** For every student with a "Yes" in Column F, enter the student's job description. Do not use abbreviations. If there is a "No" in Column F, enter "N/A."
- ❖ **Column I, Student's Employer: Name, Address, and Phone:** For every student with a "Yes" in Column F, enter the employer's name, address, and telephone number. If there is a "No" in Column F, enter "N/A."

**Figure 4.11.12**

**Blank Completion Rate Spreadsheet**

**Completion Rate Spreadsheet Instructions**

Figure 4.11.12 is an example of a blank completion rate spreadsheet.

Type:								12-Month Period:		
Cohort FY:								Completed Students:		
From:								Total Students:		
Code:								Completion Rate:		
To:										
Code:										
	A	B	C	D	E	F	G	H	I	J
	<b>Student's SSN</b>	<b>Student's Name</b>	<b>Student's Scheduled Completion Date</b>	<b>Student's Enrollment Dates</b>	<b>Student Completed</b>	<b>Completed Program Date</b>	<b>Student's Program of Study</b>	<b>Student Transfers to Higher Program: Date, School Name, School Address, Program</b>	<b>Student's GPA</b>	<b>Date Student Entered Armed Services</b>
1										
2										
3										
4										
5										
6										

Date \_\_\_/\_\_\_/\_\_\_ Page \_\_\_ of \_\_\_

Left-side Header Titles:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

Right-side Header Titles:

12-Month Period:  
Completed Students:  
Total Students:  
Completion Rate:

Use for:

- Economically Disadvantaged Appeal
- School to Independent Auditor
  - School to Default Management

- ❖ **Left-side Header:** Enter the titles shown in Figure 4.11.12. After each title, enter the information appropriate to that title.
- ❖ **Right-side Header:** Enter the titles shown in Figure 4.11.12. After each title, enter the information appropriate to that title. After "12-Month Period" enter the selected 12-month period. The information in the next three lines cannot be entered until the remainder of the spreadsheet is created and completed. After "Completed Students" enter the students from Column E. After "Total Students" enter the students from Column A. After "Completion Rate:" enter the completion rate. Calculate the completion rate by dividing the completed students by the total students.
- ❖ **Footer:** Include a footer showing the date the spreadsheet was prepared and the page number.

For each Column A through J, on Row 1 enter the title as shown in Figure 4.11.12. Then, beginning with Row 2, enter the corresponding information as listed below:

- ❖ **Column A, Student's SSN:** Enter the SSNs for the former regular students initially enrolled on a full-time basis in a Title IV eligible program who were originally scheduled to complete their programs during the selected 12-month period. These are the students who will be counted in the denominator of the completion rate calculation.
- ❖ **Column B, Student's Name:** Enter the names of the students whose SSNs are listed in Column A.
- ❖ **Column C, Student's Scheduled Completion Date:** Enter the student's scheduled completion date.
- ❖ **Column D, Student's Enrollment Dates:** Enter the student's beginning enrollment date and ending enrollment date.
- ❖ **Column E, Student Completed:** Enter "Yes" if the student meets the criteria outlined in the "How does a degree-granting school calculate its completion rate?" section of Chapter 4.7, "Economically Disadvantaged Appeal." If the student does not meet these criteria, enter "No." These are the students who will be counted in the numerator of the completion rate calculation.
- ❖ **Column F, Completed Program Date:** Enter the completion date for every student who met the completion criteria by completing the program. If the student did not meet the completion criteria, enter "N/A."
- ❖ **Column G, Student's Program of Study:** Enter the student's program of study for every student who met the completion criteria by transferring to a higher level program. Do not use abbreviations. If the student did not transfer to a higher level program, enter "N/A."
- ❖ **Column H, Student Transfers to Higher Program: Date, School Name, School Address, Program:** For every student with an entry other than "N/A" in Column G, enter the school name, school address, program, and date. If there is no entry or "N/A" in Column G, enter "N/A."
- ❖ **Column I, Student's GPA:** Enter the Grade Point Average (GPA) on the last day of the 12-month period for every student who met the completion criteria by remaining enrolled and maintaining satisfactory academic progress. If the student did not remain enrolled, enter "N/A."
- ❖ **Column J, Date Student Entered Armed Services:** Enter the entry date for every student who met the completion criteria by entering the Armed Services. If the student did not enter the Armed Services, enter "N/A."

### Full-Sized Blank Spreadsheets

The following pages contain seven full-sized versions of the sample spreadsheets created in this chapter. A school or data manager may photocopy and use the full-sized blank spreadsheets instead of creating their own spreadsheets. In order, they include

- ❖ Incorrect Data Challenge / New Data Adjustment / Erroneous Data Appeal Spreadsheet
- ❖ Participation Rate Index Spreadsheet
- ❖ Uncorrected Data Adjustment / New Data Adjustment Spreadsheet
- ❖ Loan Servicing Appeal Spreadsheet
- ❖ Low Income Rate Spreadsheet
- ❖ Placement Rate Spreadsheet
- ❖ Completion Rate Spreadsheet

**Incorrect Data Challenge / New Data Adjustment / Erroneous Data Appeal**

Type: \_\_\_\_\_ Number of Borrowers: \_\_\_\_\_  
 Cohort FY: \_\_\_\_\_ Number of Loans: \_\_\_\_\_

From: \_\_\_\_\_  
 Code: \_\_\_\_\_  
 To: \_\_\_\_\_  
 Code: \_\_\_\_\_

	A	B	C	D	E	F	G	H	I	J	K	L	M
	Borrower's SSN	Borrower's Name	Type of Loans	Number of Loans	Basis of Alleged Error	Earlier of LDA or LTH	Date Entered Repayment	CPD, DD, ICRD, or N/A	Cohort FY(s)	Effect on Calculation	Comments	Agree/Disagree	Data Manager Code
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													
21													
22													
23													
24													
25													

**Participation Rate Index**

Type: Cohort Default Rate:  
 Cohort FY: 12-Month Period:  
 From: Total Borrowers:  
 Code: Total Regular Students:  
 To: PRI:

	A	B	C	D	E
	Student's SSN	Student's Name	Student's Enrollment Dates	Loan Type (if any)	Loan Period
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					

**Uncorrected Data Adjustment / New Data Adjustment**

Number of Borrowers:  
Number of Loans:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

	A	B	C	D	E	F
	Borrower's SSN	Borrower's Name	Type of Loans	Number of Loans	Date Data Manager Agreed	Data Manager Code
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						

**Loan Servicing Appeal**

Number of Borrowers:  
Number of Loans:

Type:  
Cohort FY:  
From:  
Code:  
To:  
Code:

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
	Borrower's SSN	Borrower's Name	Type of Defaulted Loans	Number of Defaulted Loans	Payment Made?	Date Letter Sent	Date Call Attempted	Date Pre-Claims Assistance Requested	Date Final Demand Letter Sent	Address Known?	Date of Skip Tracing Activity	Illegible Record?	Missing Record?	Improperly Serviced?	Data Manager Code
1															
2															
3															
4															
5															
6															
7															
8															
9															
10															
11															
12															
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15															
16															
17															
18															
19															
20															
21															
22															
23															
24															
25															

**Low Income Rate**

Type: \_\_\_\_\_ 12-Month Period: \_\_\_\_\_  
 Cohort FY: \_\_\_\_\_ Award Years: \_\_\_\_\_  
 From: \_\_\_\_\_ Calendar Years: \_\_\_\_\_  
 Code: \_\_\_\_\_ Low Income Students: \_\_\_\_\_  
 To: \_\_\_\_\_ Total Students: \_\_\_\_\_  
 Code: \_\_\_\_\_ Low Income Rate: \_\_\_\_\_

	A	B	C	D	E	F
	Student's SSN	Student's Name	Student's Enrollment Dates	Economically Disadvantaged	EFC and Award Year	AGI, Family Size, and Calendar Year
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						

**Placement Rate**

Type: 12-Month Period:  
 Cohort FY: Placed Students:  
 From: Total Students:  
 Code: Placement Rate:  
 To:

Code:

	A	B	C	D	E	F	G	H	I
	Student's SSN	Student's Name	Student's Scheduled Completion Date	Student's Enrollment Dates	Student's Program of Study	Student Placed	Student's Employment Dates	Student's Job Description	Student's Employer: Name, Address and Phone
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									

Date \_\_\_/\_\_\_/\_\_\_

Page \_\_\_ of \_\_\_

### Completion Rate

Type: \_\_\_\_\_ 12-Month Period: \_\_\_\_\_  
 Cohort FY: \_\_\_\_\_ Completed Students: \_\_\_\_\_  
 From: \_\_\_\_\_ Total Students: \_\_\_\_\_  
 Code: \_\_\_\_\_ Completion Rate: \_\_\_\_\_  
 To: \_\_\_\_\_

Code: \_\_\_\_\_

	A	B	C	D	E	F	G	H	I	J
	Student's SSN	Student's Name	Student's Scheduled Completion Date	Student's Enrollment Dates	Student Completed	Completed Program Date	Student's Program of Study	Student Transfers to Higher Program: Date, School Name, School Address, Program	Student's GPA	Date Student Entered Armed Services
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
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