

Appendices

APPENDIX A: ACRONYM LIST

Acronym	Definition/Meaning	Examples
2YP	Two-Year Period	FY2012 = FY2008 and 2009
2YP-A	Two-Year Period Adjusted (Only for FY2012, 2013, and 2014)	FY2012 = FY2010 and 2011
2YP-R	Two-Year Period Medical or Dental Internship or Residency	FY2012 = FY2005 and 2006
4YP	Four-Year Period	FY2017 = FY2011, 2012, 2013, and 2014
4YP-R	Four-Year Period Medical or Dental Internship or Residency	FY2017 = FY2008, 2009, 2010, and 2011
AY	Award Year – 12-month period starting with July 1	
BLS	Bureau of Labor Statistics	
CEO	Chief Executive Officer	
CIP	Classification of Instructional Program	
CL	Credential Level	
CSV	Comma Separated Value	
CTP	Comprehensive Transition and Postsecondary (Program)	
DER	Date Entered Repayment	
DL	Direct Loan	
DP	Data Provider (or Data Manager)	
DMYR	Debt Measures Year	
DTER	Debt-to-Earnings Ratios	
ECAR	Eligibility and Certification Approval Report	

GAINFUL EMPLOYMENT OPERATIONS MANUAL

ED	Department of Education
EIN	Employer Identification Number
FAA	Financial Aid Administrator
FFEL	Federal Family Education Loan
FWS	Federal Work-Study
FSA	Federal Student Aid
FY	Fiscal Year - 12 month period starting with October 1
GE	Gainful Employment
GEDR	Gainful Employment Backup Detail Report
GEMS	Gainful Employment Management Solution
HEA	Higher Education Act
HHS	Department of Health and Human Services
IBR	Income Based Repayment (Plan)
ICR	Income Contingent Repayment (Plan)
IFAP	Information for Financial Aid Professionals
LPF	Loans Paid in Full
NCES	National Center for Education Statistics
NSLDS	National Student Loan Data System
OIB	Outstanding Interest Balance
OOPB	Outstanding Original Principal Balance
OPB	Outstanding Principal Balance
OPEID	Office of Postsecondary Education Identification Number
PDPA	Primary Destination Point Administrator
PEPS	Postsecondary Education Participants System

GAINFUL EMPLOYMENT OPERATIONS MANUAL

PPA	Program Participation Agreement
PML	Payments-Made Loans
Regs	Regulations
RR	Repayment Rate
SAIG	Student Aid Internet Gateway
SOC	Standard Occupational Classification
SPT	School Participation Team
SSA	Social Security Administration
SSN	Social Security Number
TIN	Taxpayer Identification Number

APPENDIX B: GLOSSARY

Academic Year

A time period of at least 26 instructional weeks for a clock hour program and 30 instructional weeks for a credit-hour program, in which an undergraduate student is expected to complete a minimum of:

- 24 semester or trimester hours,
- 36 quarter-hours, or
- 900 clock hours.

Schools with at least a two-year or four-year academic program leading to an associate or bachelor's degree may submit a request to the Secretary to establish a shorter academic year.

Accredited Institution

Any school or institution that has been approved by an accrediting agency on the basis that the institution meets the standards established by the accrediting agency. For purposes of the Title IV, HEA programs an institution's accrediting agency must be recognized by ED. See also accrediting agency, and nationally recognized accrediting agency or association.

Accrediting Agency

An agency recognized by ED as a reliable authority in evaluating the educational quality of programs offered by postsecondary institutions. An accrediting agency sets educational standards, evaluates institutions and programs, and attests that institutions have met its standards.

Administrative Capability

To participate in any Title IV FSA program, a school must demonstrate that it is administratively capable of managing its basic operations. Indicators of administrative capability include:

- adequate staffing,
- accurate recordkeeping and reporting,
- formal student aid procedures and electronic processes, and
- adequate communication.

For a complete list of requirements, see [34 CFR 600](#) and [34 CFR 668.16](#).

Alternative Earnings

Income attributed to GE Program completers that is based on sources other than the earnings provided to ED by SSA. A school may demonstrate that a failing program would meet Debt-to-Earnings standard by recalculating the ratios using the median loan debt and alternative earnings from a state-sponsored data system, institutional survey data conducted in accordance with NCES, or the Bureau of Labor Statistics (BLS) for FYs 2012, 2013, and 2014 only. The numerator used for the Alternative Earnings is that calculated prior to the 1-to-1 removal of the highest debtors to SSA non-matches. Schools have 14 calendar days from notification of final Debt Measures to notify of intent to use Alternative Earnings and 60 calendar days from notification of final Debt Measures to submit documentation.

Annual Earnings

This is the amount of income (wages, salaries, tips, and self-employment) that a student has earned for one calendar year (January 1 through December 31) as reported to the Social Security Administration. ED obtains from the SSA the most currently available mean and median annual earnings of the student who completed the program during the 2YP, 2YP-R, 4YP, or 4YP-R. The Debt-to-Earnings Ratios are calculated using the higher of the mean or median earnings.

Award Year

The time period, from July 1 of one year through June 30 of the following year, for which financial aid awards are made. The award year differs from the federal fiscal year (which is from October 1 through September 30 of the following year).

Bureau of Labor Statistics (BLS)

The [Bureau of Labor Statistics \(BLS\)](#) is the principal fact-finding agency for the federal government in the broad field of labor economics and statistics. The BLS is an independent national statistical agency that collects, processes, analyzes, and disseminates essential statistical data to the American public, the U.S. Congress, other federal agencies, state and local governments, business, and labor. The BLS also serves as a statistical resource to the Department of Labor.

Certificate

This is an academic credential awarded by an institution of higher education.

Certification

The FSA process of determining whether a school is eligible to participate in Title IV programs.

Classification of Instructional Program (CIP) Code

The Classification of Instructional Programs (CIP) provides a taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completions activity. Institutions report credentials awarded by CIP codes when completing the [Integrated Postsecondary Education Data System \(IPEDS\) Completion Survey](#). Institutions are also required to list individual programs by CIP on their [Application for Approval to Participate in Federal Student Financial Aid Programs \(E-App\)](#).

Clock Hour Program

A degree or certificate program that measures completion using a period of time consisting of:

- a 50-minute to 60-minute class, lecture, or recitation in a 60-minute period, or
- a 50-minute to 60-minute faculty-supervised laboratory, shop training, or internship in a 60-minute period, or
- 60 minutes of preparation in a program of study by correspondence.

Credential Level (CL)

Identifies the level of a program of study. Levels include undergraduate certificate, associate's degree, bachelor's degree, post baccalaureate certificate, master's degree, doctoral degree, and first professional degree.

Credit Hour

On October 29, 2010, [34 CFR 600.2](#) revised the Credit Hour definition for FSA purposes, defining a credit hour as an institutionally established equivalency that reasonably approximates some minimum amount of student work reflective of the amount of work expected in a Carnegie unit: key phrases being "institutionally established," "equivalency," "reasonably approximates," and "minimum amount." A credit hour is a unit of measure that gives value to the level of instruction, academic rigor, and time requirements for a course taken at an educational institution. Institutions have the flexibility to demonstrate alternative methods of measuring student learning, so long as they result in institutional equivalencies that reasonably approximate the definition of a credit hour for federal purposes. For more detailed guidance, see [DCL GEN-11-06](#) and the [Federal Student Aid Handbook](#).

Dear Colleague Letter (DCL)

These letters, also referred to as Dear Partner Letters, highlight important changes to or clarifications of current regulations or requirements for the Title IV programs. ED posts them to [IFAP](#) which includes the three most recent calendar years of DCLs as well as archived letters dating back to 1994.

Debt Measures Year (DMYR)

The Debt Measures Year (also referred to as Calculation, or Calc. Year), is the federal fiscal year for which the Gainful Employment Debt Measures or Loan Medians for Disclosures are based.

For example, the rates released in 2012 will be based on the 2011 Debt Measures Year: October 1, 2010, through September 30, 2011.

Debt Measures

Refers collectively to the loan Repayment Rate and Debt-to-Earnings Ratios.

Debt-to-Earnings Exclusions

For the fiscal year Debt-to-Earnings being calculated for a program, a student is excluded from the ratios if one or more of the student's loans were in a military-related deferment status at any time during the calendar year for which earnings are obtained, the student died, one or more of the student's loans were assigned or transferred to ED and are being considered for discharge as a result of total and permanent disability, or the student was enrolled in any eligible program at the school or at another school during the calendar year for which earnings are obtained.

Debt-to-Earnings Ratio (DTER)

The Debt-to-Earnings Ratios are measures of the average share of the GE Program's former students' income that must be used to repay student loan or other educational debt incurred by the students for attendance in the GE Program.

Debt-to-Earnings Ratios Challenge

This is a challenge to the accuracy of the Debt-to-Earnings rates made by submitting evidence to ED showing that the borrower loan data or the program median loan debt is incorrect. Schools have 45 calendar days from notification of draft Debt-to-Earnings to submit a challenge.

Default

For federal student loans, a specific status wherein the borrower has failed to make payments for a period of time defined by regulation. See [34 CFR 682.200](#) and [34 CFR 685.102](#).

Deferment

For federal student loans, a period of time in which loan payments do not have to be made. Depending on the loan program, students may be granted deferments for many reasons, such as returning to school, economic hardship, or disability.

Denominator

There are two components in a fraction: the numerator and the denominator. The denominator is the expression usually written below the line in a common fraction to establish its relationship to the number written above the line.

Department of Education (ED)

The U.S. Department of Education and a common abbreviation that refers to it.

Direct Loan Program

A federal program in which the U.S. Government, not a commercial lender, provides four types of education loans to student and parent borrowers directly through schools:

- Subsidized Stafford Loan (for students),
- Unsubsidized Stafford Loan (for students),
- PLUS Loan (for parents and graduate students), and
- Consolidation Loan (for students and parents).

These are referred to collectively as Direct Loans. The same types of loans used to be available through the Federal Family Education Loan (FFEL) Program using funds from private lenders, but that program was discontinued in 2010.

Disbursement

The process by which Title IV program funds are paid to a student or parent borrower. A school may pay a student or parent directly (by cash payment, check, or electronic funds transfer) or credit a student's school account.

Discretionary Income

The difference between the mean or median annual earnings and 150% of the Poverty Guideline for a single person in the continental U.S. as of January 31 of the Calculation Year.

Draft Debt Measures

Debt Measures distributed to schools prior to a final measure being issued. These Debt Measures are not made public and only viewable by the school and ED. The draft Debt Measures are challengeable.

Electronic Announcement (EA)

Electronic Announcements are used by ED to distribute information quickly—often electronic processing, but sometimes about other topics, such as clarification of regulations or policy, that don't require a lengthy clearance process.

Electronic Application for Approval to Participate (E-App)

The [Electronic Application for Approval to Participate](#) is the electronic application that the school uses to apply for the first-time for approval to participate in the federal student aid programs. This Web-based application is also used to report changes, add locations and programs, and apply for recertification of the school's Program Participation Agreement (PPA).

Eligibility and Certification Approval (ECAR)

The ECAR contains the most critical data elements that form the basis of a school's approval (e.g., accreditation and state licensing) and lists the highest level of programs offered, non-degree programs or short-term programs, and any additional locations that have been approved for Title IV programs.

Eligible Institution

An institution of higher education that meets all the criteria to participate in Title IV federal student aid programs (includes public or private non-profit institutions, postsecondary vocational schools, and proprietary institutions).

Eligible Program

A legally authorized course of study that leads to a degree or certificate and meets specified Title IV eligibility criteria.

Eligible Student

A postsecondary student who meets the federal student aid eligibility requirements. (See *FSA Handbook, Volume 1: Student Eligibility* and Subpart C of the Student Assistance General Provisions regulations ([34 CFR 668](#))).

Enrolled

For federal student aid purposes, a student is considered enrolled when he or she completes registration requirements and begins the attendance period (or, for a correspondence course, submits one lesson).

Enrollment Reporting

A function of the National Student Loan Data System ([NSLDS](#)) that monitors student enrollment status. When a student's enrollment status changes in any way that affects loan repayment, the school generally must notify NSLDS within 30 days of the change. Formerly called Student Status Confirmation Reporting (SSCR).

Failing Program

Starting with FY2012, a program fails for a fiscal year if its final Debt Measures do not meet any of the minimum standards.

Federal Consolidation Loan

A loan funded by a private lender that combines multiple Title IV student loans into a single loan with one monthly payment. Borrowers may also consolidate certain student loans provided by the U.S. Department of Health and Human Services. (Federal Consolidation Loans were part of the FFEL Program, which was discontinued in 2010. Although such loans are still being serviced and repaid, new federal student loans are being made only under the Federal Direct Loan Program.) See also Federal Direct Consolidation Loan.

Federal Direct Consolidation Loan

A loan funded by the federal government rather than a private lender that combines multiple Title IV student loans (including non-Direct loans) into a single loan with one monthly payment. Borrowers may also consolidate certain student loans provided by the U.S. Department of Health and Human Services.

Federal Direct Loan Program

A federal program in which the U.S. Government (not a commercial lender) provides five types of education loans to student and parent borrowers directly through schools:

- Federal Direct Stafford Loan (subsidized, for students)
- Federal Direct Unsubsidized Stafford Loan (for students)
- Federal Direct Grad Plus Loan (for students)
- Federal Direct PLUS Loan (for parents) and
- Federal Direct Consolidation Loan (for students and parents)

These loans are referred to collectively as Direct Loans. The same types of loans used to be available through the FFEL Program using funds from private lenders, but that program was discontinued in 2010.

Federal Direct PLUS Loan

An education loan that parents can borrow on behalf of their dependent children. PLUS loans are also available to graduate and professional students. See [DCL GEN-06-02](#) for additional information. As part of the Federal Direct Loan Program, Direct PLUS Loans are made directly by the federal government (rather than a private lender) through participating schools. Compare Federal PLUS Loan.

Federal Direct Stafford Loan (Subsidized)

A federally subsidized, low-interest student loan awarded on the basis of financial need. The federal government does not charge interest on subsidized loans while borrowers are enrolled at an eligible school at least half-time, during the six-month grace period, or during authorized periods of deferment. As part of the Federal Direct Loan Program, these loans are made directly by the federal government (rather than by a private lender) through participating schools. Compare Federal Stafford Loan.

Federal Direct Unsubsidized Stafford Loan (Direct Unsubsidized Loan)

A low-interest loan for students who do not meet the financial need criteria for a subsidized loan. The borrower is responsible for all interest on the loan. As part of the Direct Loan Program, these loans are made directly by the federal government (rather than by a private lender) through participating schools. Compare Federal Unsubsidized Stafford Loan.

Federal Family Education Loan (FFEL) Program

Full name of the FFEL Program. A federal loan program under which commercial lenders provided student loans insured by state or private non-profit guaranty

agencies. These guaranty agencies were reimbursed by the federal government for all or part of any insurance claims paid to lenders. (This guarantee replaced the collateral or security usually required with long-term consumer loans.) This program was discontinued in 2010. Although such loans are still being serviced and repaid, new federal student loans are being made only under the Federal Direct Loan Program.

Federal Fiscal Year

A federal fiscal year begins on October 1 of the calendar year and ends on September 30 of the next calendar year. A federal fiscal year is always identified by the calendar year when the fiscal year ends. Also referred to as a fiscal year.

Federal Perkins Loan Program

This campus-based loan program provides low-interest student loans to undergraduate and graduate students with financial need.

Federal PLUS Loan

An education loan which parents can borrow on behalf of their dependent children. PLUS loans are also available to graduate and professional students. See [DCL GEN-06-02](#) for additional information. Loans are made by commercial lenders such as banks, credit unions, or savings and loan associations. (This loan was part of the FFEL Program, which was discontinued in 2010. Although such loans are still being serviced and repaid, new federal student loans are being made only under the Federal Direct Loan Program.) Compare Federal Direct PLUS Loan.

Federal Register

A federal government publication that contains regulations, regulatory amendments, notices, and proposed regulatory changes for all federal executive agencies. It is published each business day. ED posts Federal Register excerpts pertaining to federal student financial aid to the Information for Financial Aid Professionals ([IFAP](#)) database to make this information readily available to schools and the financial aid community.

Federal Stafford Loan (Subsidized)

A federally subsidized, low-interest student loan funded by a private lender and awarded on the basis of financial need. The federal government does not charge interest on subsidized loans while borrowers are enrolled at an eligible school at least half-time, during the six-month grace period, or during authorized periods of deferment. (This loan was part of the FFEL Program, which was discontinued in

2010. Although such loans are still being serviced and repaid, new federal student loans are being made only under the Federal Direct Loan Program.) Compare Federal Direct Stafford Loan.

Federal Student Aid (FSA)

The office within ED that is responsible for managing the operational functions supporting Title IV programs.

Federal Unsubsidized Stafford Loan

The unsubsidized Federal Stafford Loan Program provides loans to students who do not meet the financial-need criteria for a Federal (Subsidized) Stafford Loan. An unsubsidized Federal Stafford Loan may be substituted for all or part of the Expected Family Contribution (EFC) and is referred to as a non-need-based loan. The borrower may choose to pay interest charges on the loan or allow the interest to be capitalized (added to the loan principal) when the loan enters repayment. These loans may be borrowed by undergraduate, graduate, and professional students. (This loan was part of the FFEL Program, which was discontinued in 2010. Although such loans are still being serviced and repaid, new federal student loans are being made only under the Federal Direct Loan Program.) See also Federal Direct Stafford/Ford Loan (Direct Subsidized Loan). Compare Federal Direct Unsubsidized Stafford/Ford Loan (Direct Unsubsidized Loan).

Federal Work-Study (FWS) Program

The Federal Work-Study program is a federal Campus-based employment program that provides part-time employment for students with financial need.

Final Debt Measures

The final Debt Measures issued to the schools after the challenge process. These Debt Measures are made public after they are issued to the school. Final Debt Measures are not challengeable. However, schools with a failing program can submit documentation for Alternative Earnings on the final Debt-to-Earnings Ratios.

Financial Aid Administrator

An individual employed by an institution to administer federal student aid programs and to coordinate aid from these programs with the school's other student aid programs and a student's outside financial resources.

Fiscal Year (FY)

When used in this document, another name for federal fiscal year.

FSA Handbook

A multi-volume annual publication that provides detailed information on the administration of the Title IV federal student aid programs, as well as on institutional eligibility to participate in these programs.

Gainful Employment Backup Detail Report (GEDR)

The Gainful Employment Backup Detail Report (GEDR) is a comprehensive file containing all data used in a Gainful Employment calculation. The Loan Medians for Disclosures and Gainful Employment Debt Measures are the two different types of GEDRs and use the exact same format to deliver the data used for the particular calculation. GEDRs are distributed with the Gainful Employment Letters that inform institutions of their rates. GEDRs may also be requested under the “Reports” tab on the [NSLDS Professional Access](#) website.

Gainful Employment Management Solution (GEMS)

This is the system institutions will use to challenge the Pre-Draft completers list, the Repayment Rate, or the Debt-to-Earnings Ratios, and to submit a request for alternative earnings.

Gainful Employment (GE) Program

A Title IV eligible educational program that trains students for gainful employment in a recognized occupation with the following minimum standards:

- Annual loan Repayment Rate of at least 35% for students who complete the program; or
- Annual loan payment that is less than or equal to 30% of discretionary income for students who complete the program; or
- Annual loan payment that is less than or equal to 12% of annual earnings for students who complete the program.

Graduate or Professional Student

A student enrolled in a program that leads to a degree higher than a baccalaureate degree. To receive Title IV aid as a graduate or professional student, the student must have completed at least three years of full-time study at an institution of higher education and may not be concurrently receiving Title IV aid as an undergraduate student.

Higher Education Act (HEA)

Federal legislation passed in 1965, and its subsequent amendments and reauthorizations authorizing the majority of the federal student financial aid programs and mandating that the programs be regulated and administered by the U.S. Secretary of Education. Approximately every five years, Congress reauthorizes the act or extends the legislation for an additional period of time. The statute's most current version, as amended, is always the official version of the law.

Ineligible Program

Starting with FY2012 measures, a program that does not meet any of the minimum standards for three out of the four most recent fiscal years.

Information for Financial Aid Professionals (IFAP)

An ED online database/library (located at www.ifap.ed.gov) of current and archived FSA information/materials (e.g., technical publications, reference manuals, regulatory and policy guidance, and Dear Partner and Action Letters) pertaining to the administration of FSA programs. Also provides automatic electronic updates to FAAs who subscribe with user ID and password.

Institution of Higher Education

A public or private non-profit educational institution, including postsecondary vocational institutions or proprietary institutions, that meets the statutory and regulatory requirements in the HEA.

Institutional Financing Plan

This is the amount a student owes the institution upon completing or withdrawing from a program of study. Any loan, extension of credit, payment plan, or other financing mechanism that was provided by the institution or a related party for attendance in the GE Program, and that otherwise is not reported as a private education loan, that results in a debt a student must repay to the institution or the related party, after withdrawing from or completing the GE Program is considered part of an institutional financing plan.

Integrated Postsecondary Education Data System (IPEDS)

A system of interrelated surveys conducted annually by the U.S. Department of Education's National Center for Education Statistics ([NCES](http://nces.ed.gov)). This system includes information on enrollment, program completion, graduation rates, faculty and staff,

finances, institutional prices, and student financial aid from every institution that participates in the federal student financial aid programs.

Loan

A loan is borrowed money that must be repaid according to the terms of a signed promissory note.

Loan Debt

Includes FFEL and Direct Loans (except for Parent PLUS and TEACH Grant-related loans), any private education loans, or debt obligations arising from institutional financing that are owed by the student for attendance in a program.

Loans Paid in Full (LPF)

Loans paid in full by a borrower that have never been in default or, in the case of consolidation, neither the consolidation loan nor the underlying loan or loans have ever been in default.

Mean

The "mean" is the "average," where you add a series of numbers and then divide by the quantity of numbers in that series.

Median

The median is the middle value in a distribution of values (numbers), above and below which lie an equal number of values.

Median Loan Debt

The middle value of loan debt incurred by all students who completed the program of study in the most recent award year, above and below which lie an equal number of values. See [GE FAQ D-Q5](#) for additional information.

Median Loan Debt Challenges

This is a challenge to the accuracy of the loan debt made by submitting evidence to ED showing that the borrower loan data is incorrect. Schools have 30 calendar days from notification of median loan debt to submit a challenge.

Median Loan Debt for Disclosures

For each program offered by the school under GE, the school must provide students with the median loan debt incurred by students who completed the program in the most recently completed award year. The school must identify separately the median loan debt from Title IV, HEA program loans, and the median loan debt from private education loans and institutional financing plans.

Message Class

A message class is an identifier for sending files across the Student Aid Internet Gateway (SAIG). Message classes must meet certain rules and be uniquely named (i.e., input, or files coming into NSLDS must end in IN, and output files, those sent from NSLDS, must end in OP).

Minimum Standards

A program is considered to provide training that leads to gainful employment in a recognized occupation when the loan Repayment Rate is at least 35% or the program's annual loan payment is less than or equal to 30% of discretionary income or 12% of annual earnings.

National Center for Education Statistics ([NCES](#))

The National Center for Education Statistics (NCES) is the primary federal entity for collecting and analyzing data related to education in the U.S. and other nations. NCES is located within the Institute of Education Sciences at the U.S. Department of Education. NCES also conducts IPEDS, an annual series of interrelated surveys with every college, university, technical and vocational institution that participates in the federal student aid programs.

National Student Loan Data System ([NSLDS](#))

The ED database that collects and maintains student loan and grant data on Title IV federal student aid recipients.

Nationally Recognized Accrediting Agency or Association

An independent organization that monitors schools' practices and that certifies or approves schools to operate and/or offer certain programs of study. For schools participating in Title IV programs, these organizations must be recognized by the U.S. Secretary of Education. See also Accrediting Agency.

Normal Time

This is the amount of time necessary for a student to complete all the requirements for a degree or certificate according to the institution's catalog. This is typically four years for a bachelor's degree in a standard term-based institution, two years for an associate's degree in a standard term-based institution, and the various scheduled times for certificate programs.

Numerator

There are two components in a fraction: the numerator and the denominator. The numerator is the expression usually written above the line in a common fraction to establish its relationship to the number written below the line.

O*NET (Occupational Information Network)

Sponsored by the U.S. Department of Labor, the O*NET program is the nation's primary source of occupational information. Central to the project is the [O*NET database](#), containing information on hundreds of standardized and occupation-specific descriptors. The database, which is available to the public at no cost, is continually updated by surveying a broad range of workers from each occupation.

On-time Completion Rate

The on-time completion rate is the percentage of students who in the most recently completed award year completed the program of study in normal time compared to the total number of students who completed the program during that same award year.

Office of Postsecondary Education Identification Number (OPEID)

Identification number used by the U.S. Department of Education's Office of Postsecondary Education (OPE) to identify schools that have Program Participation Agreements (PPA) so that its students are eligible to participate in Federal Student Financial Assistance programs under Title IV regulations. This is a six-digit number followed by a two-digit suffix used to identify branches, additional locations, and other entities that are part of the eligible institution. The six-digit OPEID number is also known as the FICE code.

Open Document Format

An open document format is one that is platform-independent, is machine-readable, and is made available to the public without restriction.

OPEID – See Office of Postsecondary Education Identification Number

Original Outstanding Principal Balance (OOPB)

The amount of outstanding balance, including the capitalized interest, on FFEL or Direct Loans owed by students for attendance in the program on the date the loans first entered repayment.

Outstanding Principal Balance (OPB)

The amount of outstanding balance, including capitalized interest, on FFEL or Direct Loans owed by the student for attendance in the program as of the current date.

Payment Period

Generally, an academic period for which a specific payment of Title IV aid is made available to a student. The period of time depends on whether the school's academic program uses a term-based credit hour, non-term credit hour, or clock hour. See also [34 CFR 668.4](#).

Payments-Made Loans (PML)

Loans that have never been in default or, in the case of consolidation, neither the consolidation loan nor the underlying loan or loans attributable to the program have ever been in default where payments made by a borrower during the most recently completed fiscal year reduce the outstanding balance of a loan, including the outstanding balance of a consolidation loan to an amount that is less than the outstanding balance of the loan at the beginning of that fiscal year. Or if the program is a post baccalaureate certificate, master's degree, doctoral degree, or first professional degree program, the total outstanding balance of a consolidation loan at the end of the most recently completed fiscal year is less than or equal to the total outstanding balance of the consolidation loan at the beginning of the fiscal year. The outstanding balance of a loan includes any unpaid accrued interest that has not been capitalized.

Period of Enrollment

The period for which a Stafford or PLUS loan is intended. The period of enrollment must coincide with a bona fide academic period established by the school for which institutional charges are generally assessed (e.g., semester, trimester, quarter, length of the student's program, or academic year). This is also known as the loan period, but is NOT the same as the generic term "enrollment period."

Postsecondary Education Participants System (PEPS)

The Federal Student Aid (FSA) management information system for all organizations that have a role in administering federal student financial aid and other Higher Education Act programs. It maintains eligibility, certification, demographic, financial, review, audit, and default rate data about schools, lenders, and guarantors participating in the Title IV programs.

Postsecondary Vocational Institution

For Title IV program purposes, a public or private non-profit educational institution that is otherwise eligible for Title IV aid and that offers at least: a 15-week undergraduate program (of 600 clock hours, 16 semester or trimester hours, or 24 quarter hours); or a 10-week program (of 300 clock hours, eight semester or trimester hours, or 12 quarter hours) that is also a graduate/professional program or that admits only students with an associate degree or equivalent; or a 10-week undergraduate program (of 300-599 clock hours) that admits at least some students without an associate degree or equivalent and meets some specific qualitative standards (such a program is eligible for FFEL and Direct Loan participation only). Compare with institution of higher education and proprietary institution of higher education.

Pre-Draft Corrections

For the Debt-to-Earnings Ratios, schools are provided a list of students who will be included in the applicable two-year or four-year period for calculating the ratios before ED issues the draft ratios. Schools have 30 calendar days to submit a correction to the student identifiers and GE reporting data.

Primary Destination Point Administrator (PDPA)

The Primary Destination Point Administrator (PDPA) is an individual who has been appointed by the organization as the responsible party for the enrollment of the organization's additional users. The Primary Destination Point Administrator is responsible for the users' access to Federal Student Aid systems, to ensure the data provided by these systems is protected according to the Privacy Act of 1974, as amended, as well as to ensure users appropriately access records.

Private Education Loan [defined in Truth-in-Lending Regulations [12 CFR 226.46\(b\)\(5\)](#)]

This is an extension of credit that:

- is not made, insured, or guaranteed under Title IV of the HEA;

- is extended to a consumer expressly, in whole or in part, for postsecondary education expenses, regardless of whether the loan is provided by the educational institution that the student attends;
- does not include open-end credit or any loan that is secured by real property or a dwelling; and,
- does not include an extension of credit in which the covered educational institution is the creditor if (1) the term of the extension of credit is 90 days or less (short-term emergency loans) or (2) an interest rate will not be applied to the credit balance and the term of the extension of credit is one year or less, even if the credit is payable in more than four installments (institutional billing plans).
- Examples of private education loans include, but are not limited to, loans made expressly for educational expenses by financial institutions; credit unions; institutions of higher education or their affiliates; states; localities; and guaranty agencies.

Private, Non-profit Institution

A school under private control that was not established for the purpose of making a profit.

Promotional Materials

Promotional materials are invitations, advertisements, or solicitations that mention or refer to a program at a postsecondary institution. The materials could be multi-media such as postcards, flyers, billboard and transit advertising, radio, television, Web or similar advertising.

Proprietary Institution of Higher Education

For Title IV program purposes, a private for-profit educational institution that is otherwise eligible for Title IV aid and that offers at least: a 15-week undergraduate program (of 600 clock hours, 16 semester or trimester hours, or 24 quarter hours); or a 10-week program (of 300 clock hours, eight semester or trimester hours, or 12 quarter hours) that is also a graduate/professional program or that admits only students with an associate degree or equivalent; or a 10-week undergraduate program (of 300-599 clock hours) that admits at least some students without an associate degree or equivalent and meets some specific qualitative standards (such a program is eligible for Direct Loan participation only).

See also Institution of Higher Education and Postsecondary Vocational Institution.

Public Institution

A school maintained at public expense and under public control.

Recognized Occupation

A 'recognized occupation' is one that is listed in the 'occupational division' of the most recent edition of the Occupational Information Network as published by the U.S. Department of Labor. ([See O*NET](#)).

Regular Student

A person enrolled or accepted for enrollment in an eligible program at an eligible postsecondary institution for the purpose of obtaining a degree or certificate offered by that institution.

Repayment

A period of time when a federal student loan borrower is required to make payments on the loan according to a schedule agreed to by the lender.

Repayment Rate (RR)

The GE Repayment Rate is a measure of whether students who were enrolled in a GE Program are repaying their FFEL Program and Direct Loan Program loans. These former students include both those who completed the GE Program and those who did not complete. The Repayment Rate is calculated using the most recently completed federal fiscal year's (FY) Title IV loan repayment activity of the GE Program's former students whose Direct Loan or FFEL Loans entered repayment during the appropriate cohort period.

Repayment Rate Challenge

This is a challenge to the accuracy of the loan data, made by submitting evidence to ED, showing the loan data or list of borrowers used to calculate the draft loan Repayment Rate is incorrect. Schools have 45 calendar days from notification of draft Repayment Rate to submit a challenge.

Repayment Rate Exclusions

The loans that are excluded from the original outstanding principal balance (OOPB) from both the numerator and denominator because the borrower was in an in-school or military deferment status during any part of the fiscal year, the loan was discharged as a result of death, or the loan was assigned or transferred to ED and are being considered for discharge or have been discharged as a result of total and permanent disability of the borrower.

SAIG

See Student Aid Internet Gateway.

Secretary

Refers to the Secretary of the U.S. Department of Education.

Small Numbers

Measures are calculated for small numbers of borrowers or completers by using the 4YP or the 4YP-R. For loan Repayment Rate, the corresponding 2YP or the 2YP-R represents 30 or fewer borrowers whose loans entered repayment after any of those loans are excluded. For Debt-to-Earnings Ratios, the corresponding 2YP or the 2YP-R represents 30 or fewer students who completed the program after any of those students are excluded.

Social Security Administration (SSA)

The federal agency that establishes policy for, administers, and coordinates Social Security earnings and benefits.

Social Security Administration Match (SSA Match)

The corrected list of student completers from the Debt-to-Earnings Pre-Draft Corrections Process is submitted to SSA. SSA provides a summary of mean and median earnings by school by program to ED.

Standard Occupational Classification (SOC) Codes

SOC codes are published by the Department of Labor and are available at www.bls.gov/soc. There is a crosswalk between CIP and SOC codes that can be found at: www.onetonline.org/crosswalk.

Student Aid Internet Gateway (SAIG)

The SAIG is the virtual network used to send and receive student aid data files over the Internet. The SAIG links thousands of Destination Points across the United States, its territories, and certain ED-designated foreign countries to the Higher Education Act's Title IV student financial aid programs and delivery system. Organizations enroll individuals as Primary Destination Point Administrators (PDPAs) in the SAIG. PDPAs are assigned Destination Points (TG numbers/mailboxes) that receive and transmit data for various Title IV student aid program systems such as NSLDS, CPS, and the Common Origination and Disbursement ([COD](#)) System.

Student Consumer Information

Information that Title IV institutions are required to disclose to their consumers, enrolled students, and prospective students, including:

- basic information about the school's academic programs, facilities, and financial aid;
- disclosures on campus security, graduation and transfer-out rates, revenue, and expense data at schools awarding athletically-related student aid; and,
- for schools participating in the Campus-based Programs, disclosure on drug abuse and alcohol abuse prevention.

Term-Based Program

A degree or certificate program that uses standard semesters, trimesters, or quarters to divide the academic year.

TG Number

The TG number (also referred to as the mailbox, SAIG mailbox, and Destination Point mailbox) is the number assigned to the institution when the school enrolls in the Student Aid Internet Gateway (SAIG) and is used for sending and receiving financial aid data through the SAIG. A TG number is the identifier for the electronic mailbox. It is a five-character alpha numeric string preceded by "TG," such as TGA0001.

Third-Party Servicer

An individual, state, or organization that contracts with a school to administer any aspect of the school's Title IV program participation.

Title IV Federal Student Aid

Financial aid programs for postsecondary students, authorized under Title IV of the Higher Education Act of 1965, as amended (HEA). The programs are administered by the U.S. Department of Education. Title IV federal student aid programs are:

- Federal Pell Grant Program
- Teacher Education Assistance for College and Higher Education (TEACH) Grant
- Iraq and Afghanistan Service Grant (IASG)
- Federal Supplemental Educational Opportunity Grant (FSEOG) Program
- Federal Work-Study (FWS) Program
- Federal Perkins Loan Program
- William D. Ford Federal Direct Loan Program

Undergraduate

A postsecondary student who does not have a first baccalaureate degree or a first professional degree.

U.S. Department of Education

The U.S. Department of Education (ED) is the federal agency responsible for the administration of federal education programs, including the federal student financial aid programs.

Vocational-Technical Institution

A school that provides a program of training to prepare students for gainful employment in a recognized occupation.

Withdrawn (W)

For GE Reporting, “withdrawn” is reported for any student who was enrolled in a GE Program at any point during the award year and stopped attending the program for more than a regularly scheduled vacation period without completing the program. A student on a leave of absence should be reported as Withdrawn.

APPENDIX C: THE E-APP, BY SECTION

Some sections of the E-App contain multiple pages, due to the large amount of content in those sections. A description of each section appears below.

Section A

This section contains general questions about your institution. All schools must fill out this section.

Section A includes three pages.

- Page 1 includes Questions 1 – 9 (application purpose and general information)
- Page 2 includes Questions 10 – 12 (officials)
- Page 3 includes Questions 13 – 14 (designated officials for mailing publications and for the application)

Question 1: Purpose of Application

- You must check off at least one box that explains the purpose for your application.
- If the purpose for your application is not one of those initially described:
 - Click the *Update Information* checkbox and select a purpose from that pick-list.
 - If the purpose for your application is still not one of those described, click the *Other* checkbox and enter the purpose in the field next to the checkbox.

Section E

This section is where Institutions submit additional information about educational programs that they want to be eligible for Title IV financial aid.

Section E includes three pages.

- Page 1 includes Question 26 (types of educational programs offered)
- Page 2 includes Question 27 (list of non-degree programs)
- Page 3 includes Question 28 (contract with an organization or ineligible institution)

Question 26 is on the first page and serves as a screening question. Other questions will (or will not) appear based on the Institution's answers in Question 26. This question asks about the types of educational programs offered. Institutions should ensure that they check the boxes for all types of programs provided.

NOTE:

It is very important that you select the correct purpose for your application. This allows the E-App system to route the information to a staff member who works with that type of application. Additionally, ED analyzes data for various purposes based on the different application types. If you select an incorrect purpose (or type in text for a purpose that is available on a list), the reviewer will require that you revise your application to enter the correct purpose for the application.

Question 27: Non-degree Programs

- To update information about one of your programs, click on the *Update/Review Program* link. A page containing all of the information about this program will be displayed.
- If required information is missing for one of your programs, a red asterisk (*) will display in the *Need More Info* column.
- To add another non-degree program, click on the hot link *Click here to add a new program*.
- To display a list of valid CIP codes and program names, click on the *A list of CIP codes accompanies this application* link.
- To copy a CIP code into Question 27:
 - Highlight the CIP code.
 - Press Control-C to copy the code.
 - Use your browser's back button to return to Section E.
 - Click on the CIP code field in Question 27.
 - Press Control-V to paste the code into Question 27.
- If you checked box e in Question 26, you must fill out section 27a for each graduate non-degree program.
- If you checked box g or h in Question 26, you must fill out section 27b for each undergraduate non-degree program.
- If you checked box i in Question 26, you must fill out section 27c for each short-term undergraduate non-degree program.
- If you did not check box e, g, h, or i in Question 26, do not enter any school programs in Question 27.
- You must enter the number of clock hours, unless it is exempt from the clock to credit-hour formula.
- Enter the number of credit hours if your program is a credit-hour program. You must also list the type of credit hours.
- The system displays information about school programs that ED has for your school, except for completion rate and placement rate in Question 27c. These rates must be re-filled in on each application for each program you have entered in 27c.
- If you no longer offer a program at your school, enter the date it ended in the *End Date* field.
- Do not attempt to clear the fields for a school program. If you do begin to clear out the text and have NOT saved the information you started to enter, click the *Restore Original Values* button. If you have already saved the information, you will need to re-enter the data as it was previously listed on the ECAR. Contact the assigned SPT for assistance.
- If you added a program in error, select *delete this program*. NOTE: You cannot delete a program once ED approves it.

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TIP:

You may enter more than one program with the same CIP code.

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TIP:

Do not remove a program while you are still offering it. Your program loses eligibility once you provide an end date. You can provide a date in the past, but not in the future. This prevents you from being cited for funding an ineligible program.

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Question 28: Contractual Arrangements

- Enter information about organizations or ineligible institutions that provide more than 25% of any of your programs.

- Question 28 requires a *Yes* or *No* answer. If you answer *Yes*, you must enter information about the ineligible institution(s) providing programs for your school.
 - You must enter the program name.
 - You must enter a complete address for the ineligible institution.
- To indicate that an organization or ineligible institution listed is no longer providing programs for your school, enter the date it ended in the *End Date* field.
- If you are a proprietary school, enter any owner of your institution who also owns or controls 25% or more of this ineligible institution in Question 28b.
- Question 28c also requires a *Yes* or *No* answer.

Section K

This section contains questions about your administrative capability and financial responsibility. This section is required for all schools, unless the purpose of your application is only to send updates to ED. Data from previous applications will not pre-populate in this section. You must acknowledge each item each time you submit a full application.

- If you do not answer *Yes* to any (or all) of the questions 59-68, you must enter an explanation in Question 69.
- Question 64 does not apply to foreign schools.

Section K also contains space for you to enter additional information about any question in the application in Question 69. If you cannot fit all of your additional comments in the designated space for Question 69, you may submit them in writing with your supporting documentation.

Section L

A signature page is required for all applications, unless your application purpose was to update data and the only fields you changed were phone numbers, fax numbers, or Internet addresses. The appropriate person in authority at your school must sign the printed signature page. ED can currently only accept the original paper copy of the signature page.

If the person whose name is listed in Question 10 (CEO/President/Chancellor) is the person signing the application, check the box and do not fill out the rest of the page. Otherwise, you must enter the name, job title, complete address, and phone number of the person who is signing the application.

NOTE: Unless your institution has a new CEO/President/Chancellor, or ED has prior permission from the person listed in Question 10 to allow another official to sign on his or her behalf, you must have the person listed in Question 10 sign the document.

Section M

- This section contains a list of the supporting paper documentation that you must send to ED. The documentation you are required to send is based on the application type and the school type.

TIP:

If you are using Internet Explorer, the "print" button on the bottom of the page of Section L will not work. You need to go to "file" and then select "print". The date signed must be entered before the application can be submitted. The date that you submit the application will display on the page.

- You must print out Section L and send it to ED (unless your application purpose was to update information and the only information changes was phone numbers, fax numbers, or Internet addresses.). You do not need to send a copy of the application.
- You must send a current letter of accreditation (unless you are a foreign school).
- You must send a valid state license or other written proof of state authorization (unless you are a foreign school or a public institution with additional locations only in your state).
- **Private non-profit institutions only:** You must send your 501(c)(3) designation letter from the IRS (unless ED already has a copy on record).
- **For-profit institutions only:** Your individual owners will print out on Section M. You must write in the SSN for each person in Section M (this may be on separate pages); submit all pages of Section M to ED along with the other required documents.
- You must send a copy of the approval from your accrediting agency for contracting a program if your institution contracts with ineligible institutions to provide more than 25% of any educational program.

Submitting the E-App

After you enter your data on the E-App, click on the *Submit Application* link from the Index page or click the *Submit the Application* option from any application page and click the *OK/Save Data* button.

The Application Submission form will be displayed.

- If there are any edit errors on the application or if data is missing from any required field(s), messages will display to indicate what changes are required with hot links to follow to access the appropriate section of the application directly.
- If there are no edit errors on the application and you have entered all required fields, a *Submit Application* button will be displayed.
 - Click on this button to submit the application.
 - A page will display with the message *Application has been submitted to the U.S. Department of Education*, verifying that the application has been submitted.

Application Status

You can check on the status of your application at any time. Click on the ***Application Status*** link (on the left hand side) from the [Index](#) page of the E-App to display information about the status of your application. You will need to log in to view the information.

TIP:

Print or save a copy of the application for your records, but **DO NOT** send a copy of the application to ED. To print a copy of the application, click on the ***Display Application*** link.

TIP:

Making Changes After You Submit the E-App

You can make changes to your E-App after you submit the application up until the reviewer actually begins to review the data on the application. Be sure to save your changes!

The application locks when the reviewer opens it. If you need to submit a new application for update, but cannot because your current application shows Review in Process, contact the [SPT](#) for the state in which your institution is primarily authorized to offer instruction.

APPENDIX D: E-APP PAGE NAVIGATION AND TIPS

Use the TAB key or your mouse to navigate from field to field on each page of the application. Do not use the ENTER key.

At the end of each page, you have three options to choose from after you enter data.

1. Check here if you are satisfied with your entries on this page. (This is the default option and used in most cases.)
2. Check here to perform the action selected below even if there are edit errors on this page. (Use this option if you do not currently have the information to clear an error. Remember, you must correct the error(s) before you submit the application.)
3. Check here if you do not want to update your data or start an application. (Use this option if you are only reviewing your application data and not making changes.)

When you click the *OK/Save Data* button, the system default is to display the next page of the application. However, if you have selected *Update Information* and selected only one reason from the pick-list, the appropriate section of the application will be displayed after you select *OK/Save Data*.

Other options that may be available for you to choose:

- Click the *Redisplay this Page* option if you would like to redisplay the page to see data displayed from ED's system (and you have not previously saved the information).
- Click the *Go to Section* option and enter the section you would like to skip to in the box next to it.
- Click the *Return to Index* option if you wish to select a different option from the Index.
- Click the *Submit the Application* option if you have finished entering data on the application and would like to proceed directly to the *Submit Application* page.

E-App Data Entry


Do NOT use any abbreviations in the E-App.

If you enter a change to an official's name anywhere in the form, check the box that says *For name changes, check here if this is a new person*, if this is the name of a different person. However, if you are just correcting a person's name (e.g., due to marriage, misspelling, etc.), do not check the box.



TIP:

If you are using Internet Explorer as your Web browser to complete the E-App, be aware of the following known issues:

- If you press the ENTER key, it is the same as clicking the *OK/Save Data* button.
 - If you make changes on a page and then click on a link to leave that page, the changes you made will be lost.
- 
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Date Format

- Enter all dates in mm/dd/yyyy format. For example, enter January 15, 2011 as 1/15/2011.
- You must include all four digits of the year.
- You do not need to include the leading “0” on the month and day. You may write February 4, 2011 as 2/2/2011, rather than 02/02/2011.
- Slashes (/) must separate the month, day, and year.

Address Format

All entries that include an address must have a complete address, which includes a complete:

- Street Address
- City Name
- State
- Zip Code in Zip + 4 format, for all U.S. addresses*
- Postal Code and Country Name, for all foreign addresses
- Phone Number
- Email address
- The Fax Number field is optional.

* Visit the [U.S. Postal Service website](#) and click on *Look up a Zip Code* to find the Zip + 4 for any U.S. address.

E-APP DATA EDITS:

The E-App uses JavaScript to check for dates, numeric, fixed-length fields, and any required entries.

A pop-up box with an alert will display to alert the user of potential errors. Be sure to read all alerts and correct any data, if needed. This will help avoid delays in processing your application.

TIP:

The E-App also performs additional edit checks each time the user clicks on the *OK/Save Data* button (at the end of each page). **Red text** displays at the top of the page to alert the user of errors. Depending on the size of your monitor, you may need to scroll up to view these very important messages. After you make any corrections, click on the *OK/Save Data* button again to save your changes. You should scroll up to the top of the page again to be sure that no red error messages remain.

APPENDIX E: COMMON ERRORS DISCOVERED IN THE INITIAL YEAR OF GAINFUL EMPLOYMENT REPORTING

SSN Conflicts

Description: Some institutions received “SSN Conflict” errors when reporting gainful employment data. As previously mentioned, this error occurs when an entity attempts to upload a record containing student identifiers that already exist on NSLDS. It is important that you do all you can to research and resolve SSN conflicts. This process will help ensure the accuracy of data contained within NSLDS.

Guidance: The first thing you should do when attempting to resolve SSN Conflict errors is to check your institution’s records, and ensure the data you are reporting is correct. If your records are correct, access the SSN Conflict page on NSLDS to see the data provider(s) who have reported on the SSN in question. You would then contact at least one of the data providers and attempt to resolve the conflict. Remember to document all efforts to resolve SSN conflicts to satisfy your requirement for reporting—certain SSN conflicts you will not be able to resolve, so it is important that you clearly document all steps taken to resolve the conflicts.

Reporting Only Completers

Description: Some institutions only reported data for students who completed GE Programs in particular award years. In order to evaluate GE Programs, ED requires information for all students enrolled in these programs—students who are enrolled, have withdrawn, or completed the program.

Guidance: Ensure that all students who attend—for any length of time—are reported on in each award year they attend. That is, at the end of each award year, which is June 30, be sure you have reported each student that was enrolled in the program, report their status as E for still enrolled, if the student withdrew report W, and for those that completed the program, report C. Be sure to include the end date for each student that is reported with a W or a C.

Programs Crossing Award Years

Description: Some institutions received errors for invalid dates, as they reported one record for a student enrolled in a program that crosses over award years. School academic calendar years have no relation to the award year used to report gainful employment records. An award year lasts from July 1–June 30, so if a student began the program June 28 of the first year, and completed June 28 of the

following year, they would have two records: an enrolled record for the first year, and a completed record for the second.

Guidance: Ensure that students have a record for each award year for which they were enrolled in the GE Program, no matter how short the time period was for that particular award year.

Enrolled in Another GE Program Fields

Description: Some institutions experienced difficulties understanding and reporting the “Enrolled in Another GE Program” fields.

Guidance: The “N” for neither is the option to use when you do not know the student’s enrollment activities after finishing your GE Program. While ED felt it would be useful to know if a student enrolled in another program at your institution or another, you are not required to track this information and may report the “N” when you have no knowledge of the student’s action

Institutional Financing/Tuition and Fees/Private Loan Reporting

Description: Some institutions had trouble reporting Institutional Financing, Tuition and Fees, and Private Loan amounts. Institutions also received errors for reporting these figures for students who were still enrolled in the program for the award year being reported—these should only be reported for students who have completed or withdrawn the program.

Guidance: For Institutional Financing, report the amount outstanding or owed by the student as of the day the student completed or withdrew from the program.

If you decide to report on tuition and fees for a student who stops participating in a program but then returns to the program, be sure to report the amount of tuition and fees the withdrawn or completed student accumulated for the entire program, not just the award year being reported on.

Private education loans issued to a student for attendance in the GE Program should be reported in the total amount the student received for attendance in the GE Program, not just the amount for that award year.

Medical or Dental Internship Field

Description: Some institutions reported “Y” for Medical or Dental Internships or Residencies by mistake. The intended use of this field is to identify students in professional programs that require internships or residencies to complete the program.

Guidance: Answer “Y” only for students who were reported with a Credential Level of 06 or 07 who require a Medical or Dental Internship or Residency to complete the program.