



GEN-14-17

August 29, 2014

Subject: NSLDS Program-Level Enrollment Reporting

Summary: This letter provides important information regarding changes to institutional enrollment reporting requirements to NSLDS.

Dear Colleague:

In Dear Colleague Letter GEN-14-07, we provided important information regarding changes to NSLDS enrollment reporting necessary to support the new 150% Direct Subsidized Loan Limit. One of those changes is that, no later than the first NSLDS enrollment reporting submitted by an institution on or after October 1, 2014, institutions must report students' enrollment at the academic program level as well as at the institutional (campus) level¹. See the NSLDS Enrollment Reporting Guide posted on IFAP for detailed information about the NSLDS enrollment reporting requirements.

To prepare institutions to meet the new NSLDS enrollment reporting requirements, we presented webinars in July 2014². During those webinars, and in conversations with representatives of the American Association of Collegiate Registrars and Admissions Officers (AACRAO) and the National Association of Student Financial Aid Administrators (NASFAA), the community raised concerns about consequences for institutions in complying with the reporting requirements. One issue that the community raised was how we defined an academic program for the purposes of NSLDS enrollment reporting and how that definition could affect reporting for students who may be enrolled in more than one major. There were particular concerns raised about how we instructed institutions to determine and report a student's enrollment status at the academic program level.

Following discussions with AACRAO and NASFAA, we are revising the enrollment status reporting requirement from how they were presented in the webinars. This change will reduce reporting complexity for institutions while maintaining compliance with relevant statutory and regulatory provisions.

¹ We also noted that such reporting must be retroactive to July 1, 2014.

² The presentation is available through Dear Colleague Letter ANN-14-16.

830 First St. N.E., Washington, DC 20202
www.FederalStudentAid.ed.gov
1-800-4-FED-AID

NSLDS Program-Level Enrollment Reporting

Page 2

For purposes of reporting enrollment information to NSLDS, an academic program is defined as the combination of the institution's Office of Postsecondary Education Identification (OPEID) number and the program's Classification of Instructional Program (CIP) code, Credential Level, and Published Program Length. During the webinars we stated that when a student is enrolled in more than one major (or comparable designation under the academic policies of the institution) each major would be considered as an academic program and would be reported separately. This is the case regardless of whether the student receives separate degrees or certificates for each major, or only receives one degree, or other credential, after completing the requirements for all majors. A student's enrollment in a "minor" is not a separate program and therefore would not be reported as such.

During the webinar, we also discussed program-level enrollment status reporting to NSLDS. We explained that to determine a student's enrollment status for an academic program, institutions would include only the credit or clock hours associated with the student's coursework to the relevant academic program (major). An unintended consequence of this reporting framework was that institutions would need to track a student's individual credit or clock hours to place the hours in the appropriate program (or in some instances, to ignore coursework that was outside of any program). It also would have required institutions to report a student as having withdrawn from an academic program any time the student was not enrolled in coursework that specifically applied to that program, even when the student had not officially withdrawn (or been administratively removed) from the program.

While we are not revising the information included in the webinars related to the definition of an academic program for the purposes of NSLDS reporting, we are revising the requirements for determining and reporting a student's enrollment status, as follows. Institutions must report a student's "active enrollment status" (full-time, three-quarter time, half-time, and less than half-time) based on the total number of credit or clock hours in which the student is enrolled at the institution, regardless of whether any specific credit applies to the academic program being reported. If the student had withdrawn or graduated from an academic program, a "terminal enrollment status" of 'Withdrawn' or 'Graduated', as appropriate, would be reported for that program.

The following examples illustrate how institutions must report a student's enrollment at the academic program level when the student is enrolled in multiple programs.

Example 1

Student is pursuing a Bachelor's degree in Business Administration and has two majors: finance and marketing. The student is enrolled in a total of 12 semester hours, some of which apply to both majors and some to only one of the majors. The institution reports the student as being enrolled in two programs: a bachelor's degree program in finance (CIP Code 52.0304) and a bachelor's degree program in marketing (CIP Code 52.1401). [The institution would not report using the CIP code of 52.0801 – Business Administration and Management, General.] The enrollment status reported for both programs would be full-time, representing the total 12 semester hours.

Example 2

For the student from Example 1, instead of being spread out, all of the 12 credit hours are in finance. Again, the institution reports the student as being enrolled in two programs: a bachelor's degree program in finance (CIP Code 52.0304) and a bachelor's degree program in marketing (CIP Code 52.1401) with the enrollment status reported for both programs as full-time.

Example 3

Student is pursuing a Bachelor's degree in political science with a minor in international relations. The student is enrolled in a total of 12 semester hours, but only nine of those hours count toward the student's major; the remaining three semester hours count toward the student's minor. The institution reports the student as being enrolled in one program: a bachelor's program in political science (CIP Code 45.1001). The program-level enrollment status for the program would be full-time.

Example 4

Student is pursuing two degrees, a Bachelor's degree in organic chemistry and a second Bachelor's degree in French. The student is enrolled in a total of nine semester hours in a combination of organic chemistry, French, and math. The institution reports the student as being enrolled in two programs: a bachelor's degree program in organic chemistry (CIP Code 40.0504) and a bachelor's degree program in French (CIP Code 16.0901). The program-level enrollment status for both programs would be three-quarter-time.

Example 5

Student is pursuing a Bachelor's of Arts degree and has two majors: English and creative writing. The student is only enrolled in six semester hours in German language coursework, which is not required for either major. The institution reports the student as being enrolled in two programs: a bachelor's program in English (CIP Code 23.0101) and a bachelor's program in creative writing (CIP Code 23.1302). The program-level enrollment status for both programs would be half-time, even though none of the six semester hours will apply to either program.

Example 6

Student is pursuing a Bachelor's degree at an institution that does not have majors or other forms of academic concentration. The student is enrolled in six semester hours. The institution determines that the academic program is one that is interdisciplinary in nature, covers the arts, humanities, and sciences, and emphasizes breadth of study in lieu of specialization. The institution chooses to classify this program as a liberal studies program, and reports the student as being enrolled in liberal studies (CIP Code 24.0101) with an enrollment status of half-time. In this example, the institution must report a CIP Code for the program even though there was no major or other form of academic concentration.

To summarize, separate program specific enrollment reporting is required for distinct major courses of study or credentials. However, institutions should report the same active enrollment status (full-time, three-quarter-time, half-time, graduated, or withdrawn) at both the campus level and at the program level.

We expect that the changes described in this letter will obviate the need for institutions to evaluate whether an individual student's coursework applies to a specific academic major.

Finally and as noted earlier in this letter, institutions must report enrollment at the academic program level as well as at the institutional (campus) level no later than the first NSLDS enrollment reporting submitted by the institution on or after October 1, 2014. And, the information must be retroactive to July 1, 2014.

NSLDS Program-Level Enrollment Reporting
Page 5

For questions relating to what to report for specific fields in the program-level NSLDS enrollment report record, please contact 150Percent-Questions@ed.gov. For questions about the mechanics of NSLDS enrollment reporting, please contact nslds@ed.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Baker', with a long horizontal flourish extending to the right.

Jeff Baker, Director
Policy Liaison and Implementation
Federal Student Aid