eCDR Appeals System – Frequently Asked Questions

Question 1: Do returning users and/or returning schools have special responsibilities?

Answer 1: Yes. Returning users should validate that their demographic information and school profile as previously entered are correct, and must update this information as needed.

eCDR Appeals **Destination Point Administrators** (**DPA**) for returning schools and data managers are responsible for ensuring that users are provisioned and de-provisioned appropriately. They should therefore validate that all users listed for the application are still permitted to act on behalf of the organization and have the correct permissions. Also refer to Question/Answer #6 and 7 regarding account management.

Please refer to the user guides for further details. User guides are located at the eCDR Appeals homepage, available at https://ecdrappeals.ed.gov/ecdra/index.html.

Question 2: What advantages can we expect in submitting the Incorrect Data Challenge (IDC) electronically?

Answer 2: eCDR Appeals offers an easy to use interface to submit your IDC. Once you have filed an IDC electronically during the draft cycle, you are eligible to submit your UDA and NDA electronically during the official cycle. Schools that submit a paper IDC must submit paper UDA and/or NDA. You should note the following advantages:

For all schools that submit their FY 2007 IDC electronically, the official loan record detail report (LRDR) will be preloaded into eCDR Appeals in September.

For UDA - For schools that submitted their IDC electronically, the eCDR Appeals application will automatically compare the draft LRDR data, the approved IDC changes and the official LRDR data, and identify all loans eligible for inclusion in a UDA submission. UDA submission is not automatic, but this automated comparison greatly facilitates the school's work.

For NDA – For schools that submitted their IDC electronically, eCDR Appeals will similarly facilitate the school's work in ensuring their NDA submission only contains valid allegations of new LRDR data.

Question 3: I used eCDR Appeals to submit an FY 2006 IDC. What changes and improvements can I expect?

Answer 3: Obtaining and changing your account remains largely unchanged (refer to the user guides for any changes, such as the addition last fall of an online keyboard to more securely enter your account information when logging in).

With Release 2.1, effective February 9, 2009 unless otherwise noted, we have:
o Added a confirmation page to the select/deselect loans feature to ensure that schools select all of the pertinent loans for a given allegation/borrower.
o Redesigned the appearance of the web pages and reports to improve usability, and
o Added a new report showing anticipated CDR changes due to the IDC.
o Effective by early March, 2009, a school user with Case Manager access privileges will also be able to edit contact information within the school profile in the application for themselves as well as for other users within their school.

The improvements made last fall (first applicable to FY 2006 UDA/NDA processing) remain effective in the Release 2.1 IDC processing:
o The email notification feature was reset so that a single notification is issued to each contact listed when a case is submitted.
o We resolved the performance problems users experienced last year when processing very large cases (i.e., over 500 allegations), and several page design, sorting and searching improvements significantly improve navigating through a large volume of allegations.

A revised *eCDR Appeals IDC User Guide* will walk you through the details of IDC creation and processing respectively.

Question 4: Will the same timeframe constraints apply to the electronic eCDR Appeals process as apply to the paper-based process?

Answer 4: Yes. The system enforces the various timeframe constraints as indicated by regulation applicable to schools as well as to data managers. The system maintains information throughout the case's life cycle about key dates and actions taken by the school and the data managers. The system issues notification e-mails when processes within the workflow are completed by one individual/organization and the next stage of the process may proceed. For example, once the school has submitted its IDC, the data managers involved are automatically notified via e-mail that a case is awaiting their review. Conversely, if a data manager has questions while conducting its review and needs more information from the school, the data manager's work in eCDR Appeals triggers e-mail notification to the school indicating that the school must log-in to the eCDR Appeals system to review and respond to the data manager's questions (generally a request for additional support documentation). When all reviews are completed, Federal Student Aid's Portfolio Performance Division (PPD) personnel are automatically notified via e-mail as well.

E-mail notifications are an important component of the workflow. It is therefore essential for the school to update contact information and maintain current contact information in the system while a case is ongoing. The status of each established case could also be viewed online by logging into the system at any time. System users will be encouraged to log-in regularly once a case is started. Unsuccessful delivery of an e-mail notification will not be a valid justification for missing deadlines.

Question 5: If I elect to use eCDR Appeals, will I still receive the Loan Record Detail Report (LRDR) through the Student Aid Internet Gateway (SAIG)? Will I still be able to order LRDR reports and extracts from the National Student Loan Data System (NSLDS)?

Answer 5: Yes – eCDR Appeals does not change the process of receiving LRDR through SAIG or NSLDS. During the CDR cycle the LRDR is issued to you as it has been in the past through your SAIG mailbox. You can continue to receive LRDR reports and extracts from NSLDS.

If you elect to challenge your draft CDR through the automated process, you will log-in to the eCDR Appeals system, fill in some organizational profile contact information so that the system can notify the appropriate individual(s) during workflow, and create an IDC case file. This action automatically triggers an e-mail request to Federal Student Aid for your LRDR to be loaded into the system, a process that should generally be completed within several business days. Data loaded to eCDR Appeals includes LRDR information from applicable prior years. While Federal Student Aid PPD personnel load your LRDR information, the "clock" that keeps track of your deadlines is extended by the number of days that it takes PPD staff to load the pertinent LRDR information, thus this time is not charged against the school's deadline. Federal Student Aid loading the LRDR information triggers an e-mail notifying the school that the LRDRs have been loaded and that the school should proceed to log back into eCDR Appeals to develop the details of each case, to certify the case, and submit the IDC case.

Question 6: How will I get an account for eCDR Appeals?

Answer 6: Each school and data manager organization that registers for eCDR Appeals will have a **Destination Point Administrator (DPA) for eCDR Appeals** (much as is the case today for eCampus Based school users). The DPAs have the authority to approve eCDR Appeals accounts with the correct access privileges for additional members of their respective organizations. It is also the DPA's responsibility to actively manage eCDR Appeals account changes (e.g., deactivate in a timely fashion the account of an employee who has left the organization). The DPA may or may not need access to eCDR Appeals. Therefore the DPA is not automatically granted eCDR Appeals access but is able to authorize such access without further Federal Student Aid review.

eCDR Appeals will use Federal Student Aid's Security Architecture (SA) to control system access and provide for user identification and authorization. SA will provide the first screen you see when you register for an eCDR Appeals account, or you come to log-on after you have received your account. SA also provides an administrative console for the DPAs to manage users. *Many schools and data managers already access certain Federal Student Aid systems through SA, such as the eCampus Based or Financial Partners Data Mart applications. Users who already have an SA account will be prompted to update their existing profile.*

All data managers will have eCDR Appeals accounts established at the beginning of the annual CDR cycle, regardless of whether they hold loans that become part of a school's challenge or adjustment request or not. Federal Student Aid personnel will work with data managers prior to the start of the cycle to ensure that, for each data manager organization:

    (1) the organization's Destination Point Administrator has been identified and their account has been established;

    (2) at least one individual within the organization has been identified as a "Data Manager (DM) Response Manager" and their account is established; and

    (3) the organization's profile is established, including e-mail addresses for notification activities. The data manager DPA can approve additional users from within the data manager organization.

A limited number of schools challenge their CDR every year. Therefore, it is not necessary for all schools to establish an account in eCDR Appeals. We recommend that schools register to use the system on an as-needed basis. Schools should register as soon as they determine they will submit a challenge, even before they have fully identified all records they will challenge. The following process has been developed to expedite the registration process for schools requiring access to the system.

- Domestic School DPA – For domestic schools, the individual presently designated by the school as the SAIG DPA for the electronic CDR notification will serve as the authorized eCDR Appeals DPA. Thus, it is essential for school executives to ensure that the SAIG DPA data for the electronic CDR notification process remains current, and that the individual listed is authorized to carry out eCDR Appeals DPA responsibilities on behalf of the school.

  For these schools, Federal Student Aid will pre-populate the SA system with the listing of individuals designated as DPAs for the electronic CDR notification process based on the Participation Management (PM) File. To become active, each DPA will self-register through the SA interface. SA will validate the applicant against the list from the PM File. If a DPA is not on the pre-approved list, in most cases, the user will need to contact PM. The user may simply be entering personal information differently than in PM (e.g., Tom instead of Thomas). If the user is not appropriately identified as the school's DPA for electronic CDR notification in the PM File, they will need to be added before eCDR Appeals self-registration can successfully take place. If necessary, the DPM Administrator / System Security Officer (DPM SSO) will help resolve such DPA registration problems.

- Foreign School DPA – For foreign schools, the individual designated by the school as DPA for eCDR Appeals will self-register through the SA interface. Regardless of whether the foreign school has a DPA for electronic CDR notification or not, SA will notify the DPM SSO that a foreign school DPA is trying to register. The DPM SSO will approve the foreign school's DPA.

- Non-DPA Users, All Schools – Other school personnel can self-register for an eCDR Appeals account. Self-registration will trigger notification to their eCDR Appeals DPA to review and approve the account and role requested by the user.

  A non-DPA school user cannot successfully self-register to obtain an eCDR Appeals account unless they have an active eCDR Appeals DPA registered to approve their request. If the eCDR Appeals DPA has not yet registered, the user will be so notified and should contact the school's DPA. The DPM SSO can also take appropriate actions to facilitate successful school user registration.

Question 7: What kind of accounts will eCDR Appeals provide? What type of account should I get?

Answer 7: We have built two roles for schools (School Case Preparer and School Case Manager), and two roles for data managers (DM Response Preparer and DM Response Manager). End users request these roles through SA self-registration. The registered DPA approves these roles through the SA-provided administration console.

"Case Preparers" are able to carry out most functions. They cannot, however, submit a case forward through the next step in the workflow. "Case Managers" can perform all functions a preparer can perform. Additionally, "Case Managers" may submit the case across organizations through the workflow (e.g., certify a case, submit a response to a request for additional information).

It is the responsibility of the school/the data manager organization to determine which individuals within their organization should get which type of access. The DPA enforces the organization's internal decision through the approval process. Federal Student Aid reserves the right to cancel access for any individual we determine should not be granted access to the eCDR Appeals system.

Question 8: How will I learn to use the system? What kind of user support will be available?

Answer 8: Federal Student Aid will provide a User Guide that focuses on the eCDR Appeals system's features. This guide will address all functionality the system offers, from self-registration to logging in, from initiating and preparing a case, to reviewing, completing and closing the case. This guide will address the unique functions available to DPAs and the differences between a Case Preparer and a Case Manager.

The system User Guide will complement the CDR Guide. Those familiar with the CDR Guide and the IDC process should find the system's screens easy to follow. For those new to processing an IDC, the system User Guide will offer step-by-step guidance, and they should also consult the CDR Guide.

Help Desk information will be available to resolve any registration and access problems, as well as to help you walk through the system if necessary. FSA DPM continues to be the primary source of guidance for processing the IDC.

<u>Question 9: What is the automated process for the IDC, using the eCDR Appeals system?</u>

Answer 9: The **automated Incorrect Data Challenge process** is very similar to the paper-based process. It consists of three phases based on the primary stakeholder of each phase:
1) **school case preparation and submission**,
2) **data manager(s) review and response**, and
3) **Federal Student Aid Portfolio Performance Division review and approval**.

Using the web-based application simplifies case preparation and routing between stakeholders.
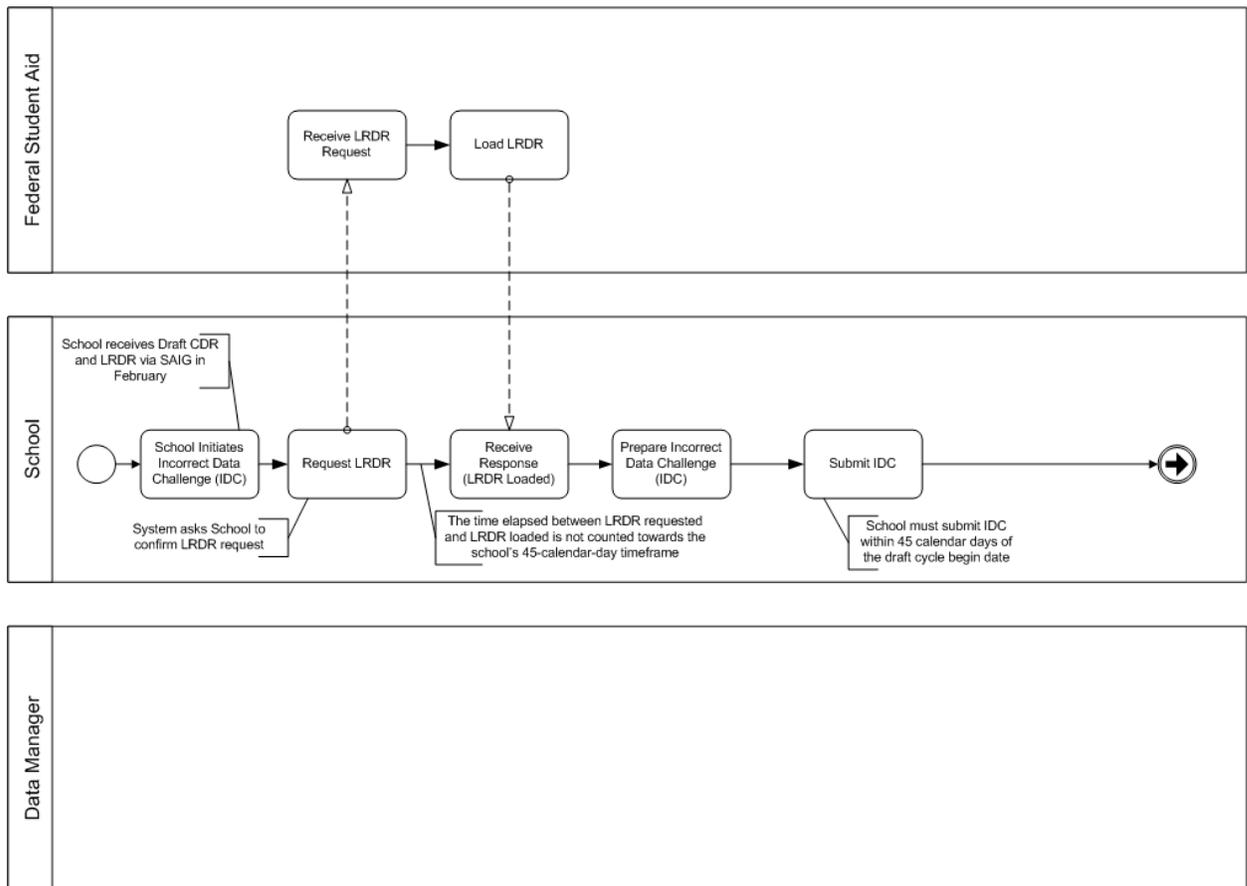

Figure 1 Incorrect Data Challenge (IDC) Automated Process - School case preparation and submission

Figure 1 shows the school case preparation and submission phase. In this phase, the school is the primary actor. The school initiates the IDC process after it decides to

challenge the draft cohort default rate. When the school initiates an IDC, the system notifies Federal Student Aid users to load the Loan Record Detail Report (LRDR) into the Cohort Default Rate Appeals system. The LRDR contains the loan data used to calculate the school's draft cohort default rate. School users select the borrowers and loan records they want to challenge, and provide corrected data. When necessary, the school user can manually add a borrower and/or loans that should have been included in the LRDR. When warranted, schools may redirect a loan to a different data manager than that listed in the LRDR. After completing all data adjustments and including supporting documentation, the school submits the IDC to challenge its draft cohort default rate. The system automatically packages the requested adjustments by Data Manager.

Based on the school user submitting its IDC within the allotted timeframe, the system will automatically notify all data managers involved that the case has been submitted and they must review it and respond.
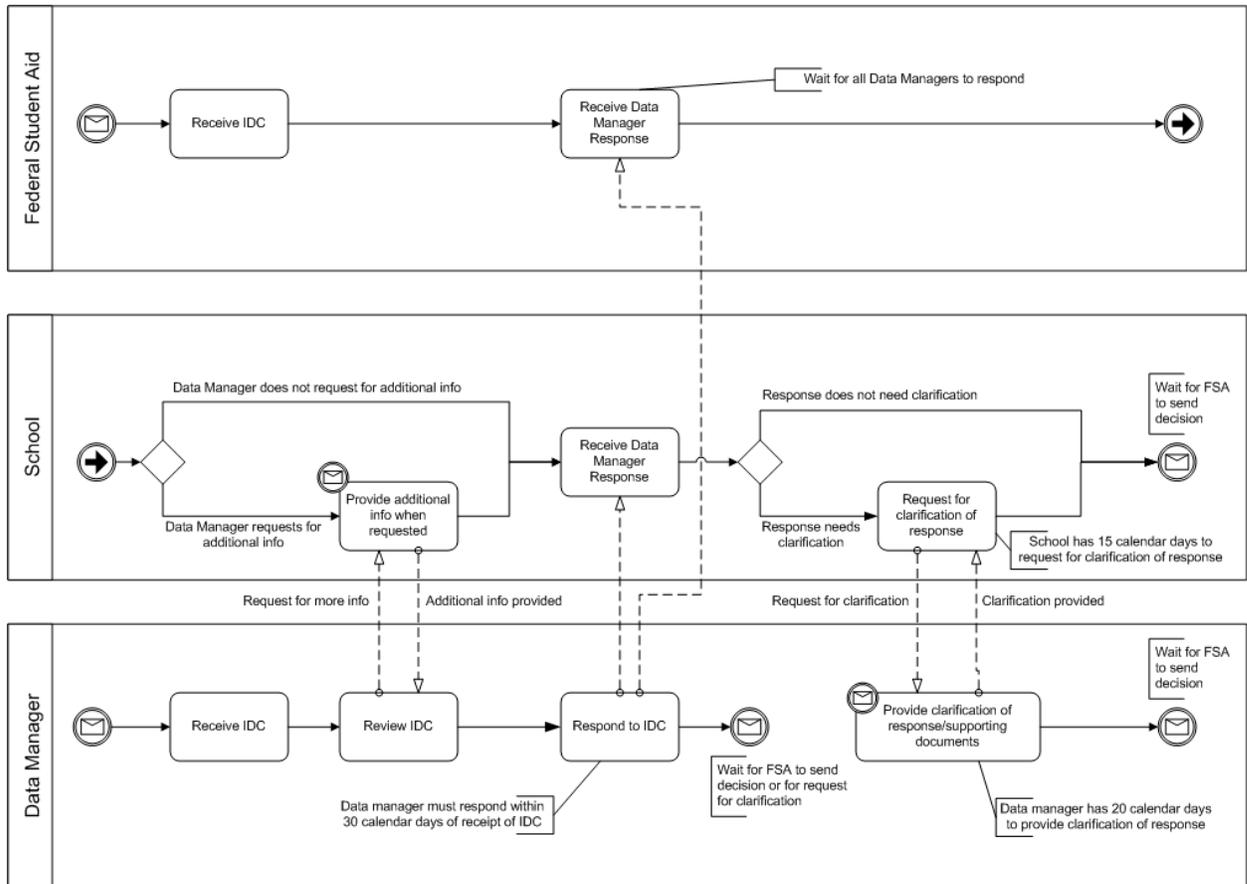

Figure 2 Incorrect Data Challenge (IDC) Automated Process - Data Manager(s) review and response

The second phase (**Figure 2**) starts when the data manager receives the IDC notification that they are responsible for reviewing certain data challenge allegations. In this phase, the data manager is the primary actor. The data manager logs in and reviews and responds to the data challenge allegations submitted by the school. The data manager

may request the school to provide more information before deciding whether or not to agree with the school's data challenge allegations. If warranted, a data manager may also redirect a particular record to another data manager without the school needing to resubmit its request.

During this phase, the school also has the opportunity to ask the data manager(s) for clarification regarding the data manager's response.

Once all data managers involved in a given IDC have completed and formalized their response, the system notifies Federal Student Aid PPD personnel that the case is ready for their review and final approval.

Figure 3 shows the last phase of the IDC process, where the Federal Student Aid PPD users review the details of the case (i.e., the school's requested data challenge allegations and the data managers' responses), and make a final determination about the IDC case.
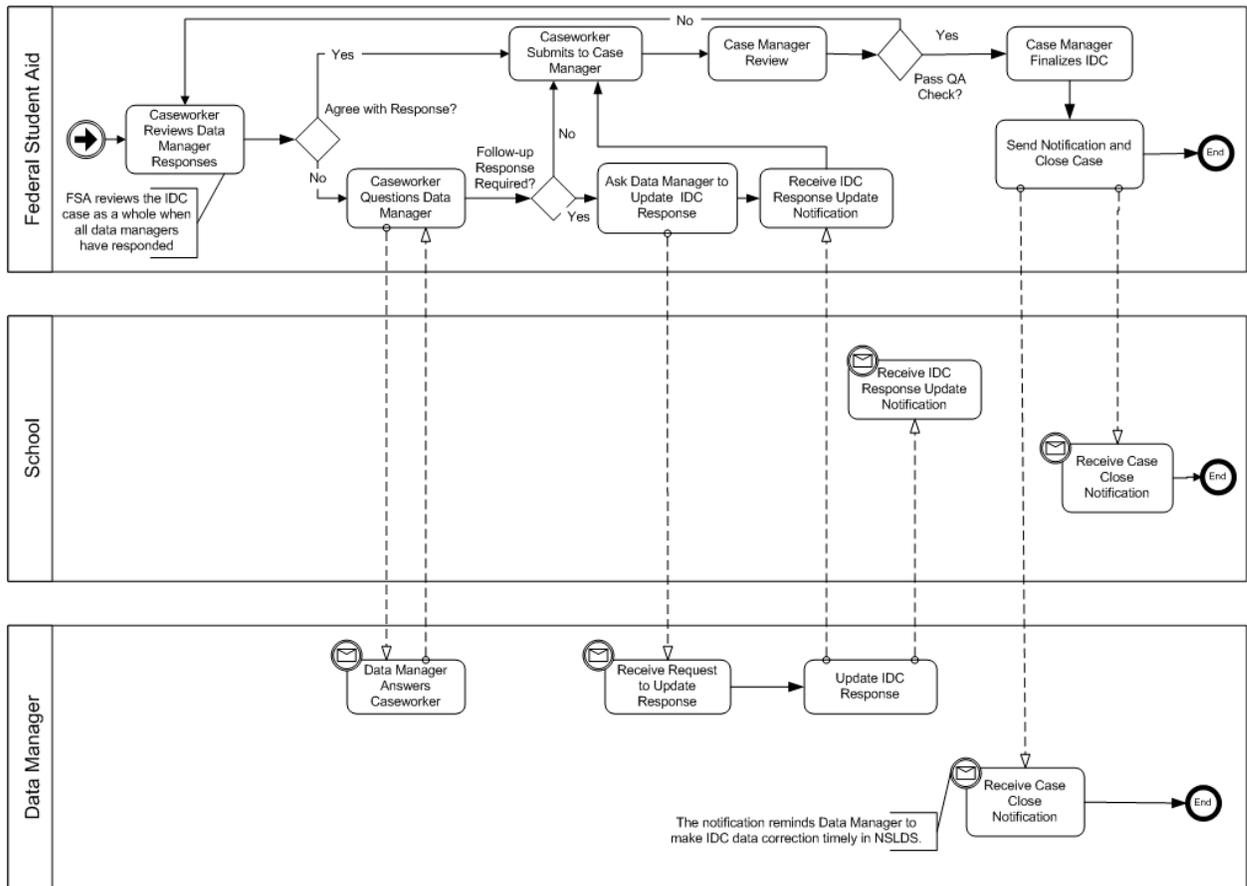

Figure 3 Incorrect Data Challenge (IDC) Automated Process – Federal Student Aid review and Approval

During this phase, once Federal Student Aid PPD has received the IDC responses from all data managers involved in the case, a Federal Student Aid Caseworker reviews the IDC Response. If the Federal Student Aid Caseworker does not agree with the data

manager(s), the caseworker then corresponds with the data manager(s) to request clarification. At this time, the Federal Student Aid Caseworker may request the data manager(s) to update their response to the school.

When the Federal Student Aid Caseworker has completed the review, the system notifies the Federal Student Aid PPD Case Manager that the IDC is ready for final disposition. If the Federal Student Aid Case Manager has any questions, the IDC case is returned to the Federal Student Aid Caseworker. After completing the review, the Federal Student Aid Case Manager finalizes the IDC case and the case is closed.

The system notifies the school and data manager(s) of the final disposition of the case via e-mail. Details can be retrieved from the system. Data managers are reminded of their obligation to reflect the approved changes in NSLDS and any internal systems.