Reporting of Concurrent Student Enrollment and its Impact on Financial Aid

ISSUE: Federal restriction of subsidized loans to 150% of program length as of July 1, 2013

Borrowers lose eligibility for additional subsidized loans when they have received subsidized loans for 150% of their current academic program (e.g., students can receive three years of sub loans for a two-year program or six years for four-year programs). This applies to first time borrowers as of July 1, 2013 (students who received loans prior to this date are not impacted).

PROBLEM: We report student enrollment information in aggregate by home campus to the National Student Clearinghouse (NSC) and authorize NSC to report enrollment information to National Student Loan Data System (NSLDS), US DOE’s centralized database of Title IV grants and loans.

When UH switched to Banner in 2002/2003, it was decided to report the total enrollment status of a student to NSC based on the student’s home campus for a specific term. For example if a student is enrolled 6cr at School A (home campus) and is also enrolled at School B for 6cr, the student is reported under School A as full-time enrolled and nothing is reported for School B. Since NSC data populates NSLDS data, students who may only be receiving aid as a part-time student (the amount that should count toward their 150% of program length eligibility) but are concurrently enrolled at multiple campuses are being reported as full-time or at a higher status.

Per US DOE, enrollment should be reported for a specific location; that is, the eight-digit Office of Postsecondary Education Identification (OPEID) number. All UH campuses have their own eight-digit OPEID number.

POSSIBLE RESOLUTIONS:

| Option 1: Status quo | • Students will have eligibility issues with the 150% subsidized loan limit and campuses will need to make individual “corrections”
|                     | • Future audit problems and possible fines by the US DOE |
| Option 2: Report directly to NSLDS (double reporting) | • UH campuses to stop NSC from reporting to NSLDS
|                     | • Create a new report to send enrollment information to NSLDS separately by September 2015 (will need to report 3-4 times per semester)
|                     | • Campuses would be required to report enrollment separately to NSC and NSLDS (the NSC report is submitted 4 times each semester) |
| Option 3: Modify NSC report to accommodate students enrolled at multiple campuses | • Modify the Banner process to create a new NSC report that separates out campuses for students enrolled at multiple campuses
|                     | • Report would need to be updated by the September 2015 submission or will also need to determine an intermediate fix
|                     | • Update executive policy E7.206 Concurrent Registration to clarify reporting of concurrent students at non-home campuses (explicitly state students are considered unclassified for reporting purposes for non-home or secondary campus enrollment) |

Additional Issues:

• Work with campuses to notify students who are seeking loan deferments that they must be enrolled in at least 6cr (half-time) at their home campus to be eligible.
• Work with campuses to ensure similar enrollment reporting is occurring at all campuses.