

## Audits & Enrollment Information: What You Need To Know

### 1. Does Our Reporting To The Clearinghouse Need To Change Once We Transition To Direct Lending?

No. In fact, the same reporting schedule guidelines apply before, during, and after you fully transition to Direct Lending. The Clearinghouse's weekly reporting to guarantors, lenders, and servicers includes reporting to the Direct Loan servicers through NSLDS. This reporting satisfies compliance with federal regulation §685.309(b)(2), which states that Direct Loan participants notifications need to be sent to the Secretary.

### 2. What is the regulatory reporting requirement for enrollment information that is evaluated during an audit?

Schools are required to:

- a. Complete and return Student Status Confirmation Reports (SSCRs) within 30 days of receipt (§682.610(c)(1)). **The Clearinghouse will do this for you once you designate us as your servicer with the Department of Education (ED) and report your enrollment information according to your Clearinghouse transmission schedule.**
- b. Report students who are no longer enrolled at least half-time directly to loan holders within 30 days, unless your school plans to submit its next SSCR within 60 days (§682.610(c)(2)). **The Clearinghouse reports enrollment information automatically to our participating loan holders for you after you report your enrollment data to us.**

### 3. Our Auditor Notified Us That Enrollment Was Not Reported To NSLDS Within The Required 30 And 60 Days, What Do I Do?

- a. Review these regulatory guidelines: §668.22, §682.605 and §682.610.

Federal regulations state that enrollment reporting compliance is established by reporting to the Secretary OR directly to the guaranty agency or lender, see §682.610(c)(2).

SSCRs must be returned to the Secretary or guaranty agency within 30 days of receiving the roster, see §682.610(c)(1). If you sent us an enrollment update, it will be included in our weekly transmission to the student loan community fulfilling §682.610(c)(2).

- b. Review the student's notification history on the Clearinghouse secure Web site. From the "Student-Look Up" tab, you can print the following information for each student:
  - Enrollment History
  - Enrollment Data Reported to Lenders, Servicers, and Guarantors
  - NSLDS SSCR Notification History

When a status change is discovered after it has occurred, compliance is determined based on the date you identify the status change ("date of determination"). The applicable regulatory references are §682.605 and §668.22(b) or (c).

You can provide your auditor with a more complete enrollment reporting overview by referencing the information on the Clearinghouse secure Web site and "active and inactive" NSLDS Enrollment Detail screens.

[more >](#)

#### **4. Is compliance for retroactive status changes determined by the status change effective date or the certification date?**

When a status change is discovered after it has occurred, compliance is determined based on the date you identify the status change ("date of determination"). The applicable regulatory references are §682.605 and §668.22.

#### **5. What happens with students who do not return to school after the summer break?**

If a student notifies you that he or she will not return, you should report the student's last date of at least half-time attendance (probably the end date of the previous term) to the Clearinghouse as soon as possible. If the student simply does not 'show' for the fall term, the Clearinghouse will determine his or her last date of attendance based on the last data you reported for the student. Your first-of-term report should be provided to the Clearinghouse no later than three weeks after the term has started in order to comply with §682.605(a).

#### **6. How Does My Clearinghouse Transmission Schedule Correlate With My SSCR Schedule?**

We will work with ED to align your SSCR creation schedule to your Clearinghouse transmission schedule, once you establish it. Typically, ED presets a generic bimonthly SSCR schedule. However, your Clearinghouse transmission schedule prompts an SSCR reporting schedule that is specific to your academic calendar and unique enrollment reporting demographic.

An SSCR is scheduled for the month following a required enrollment transmission, as listed on your Clearinghouse transmission schedule. Establishing an accurate transmission schedule and reporting data to the Clearinghouse as scheduled ensures that your enrollment data is reported to NSLDS on time via the SSCR process. This fulfills the SSCR completion requirement in §682.610(c)(1).

Your prompt reporting to the Clearinghouse enables us to proactively report enrollment to lenders and/or guaranty agencies on your behalf. If you sent us an enrollment update, it will be included in our weekly transmission to the student loan community. This establishes the foundation for the timely servicing of student loans and prevents delinquent and/or defaulted student loans, see §682.610(c)(2).

Customizing your Clearinghouse transmission schedule to your student demographics, academic calendar and policies for enrollment management and adhering to the schedule you create will ensure your compliance with regulatory guidelines, as specified in §668.22, §682.605 and §682.610.

## **Need additional help answering auditors' questions?**

**Contact the Clearinghouse Audit Resource Team at  
[auditresource@studentclearinghouse.org](mailto:auditresource@studentclearinghouse.org).**

For more information, visit our Audit Resource Center at  
[www.studentclearinghouse.org/Audit](http://www.studentclearinghouse.org/Audit)

**NATIONAL STUDENT  
CLEARINGHOUSE®**

A Non-Profit Organization Founded & Governed By The Higher Education Community