

## 4.3 Uncorrected Data Adjustment

### ***What is an uncorrected data adjustment?***

An uncorrected data adjustment is a request submitted to the U.S. Department of Education (the Department) office to ensure that a school's official cohort default rate calculation reflects changes that were correctly agreed to as a result of an incorrect data challenge that the school submitted after the release of the draft cohort default rates.

A school should submit an uncorrected data adjustment when:

- ◆ it submitted a timely challenge of its draft cohort default rate data,
- ◆ the data manager reviewing the incorrect data challenge agreed to make changes to the cohort default rate data, and
- ◆ the agreed upon changes are not reflected in the school's loan record detail report (LRDR) for the official cohort default rates.

If a school does not submit an uncorrected data adjustment after the release of the official cohort default rates, the school will not have the opportunity to submit an uncorrected data adjustment at a later time.

Uncorrected Data Adjustment Timeframe		
Draft Cycle	Not applicable	
Official Cycle	School receives official cohort default rate notification package	September
	School sends Department completed Uncorrected Data Adjustment via eCDR Appeals	Within 30 days of timeframe begin date

*Timing is critical when submitting an uncorrected data adjustment. A school must submit its uncorrected data adjustment to the Department within 30 calendar days of the timeframe begin date via the eCDR Appeals system. If the school does not submit the uncorrected data adjustment in a timely manner, the Department will not review the uncorrected data adjustment.*

### ***Which schools are eligible to submit an uncorrected data adjustment?***

Any school that receives an official cohort default rate may request that the Department adjust its cohort default rate if it meets the uncorrected data adjustment criteria as shown in the above chart. This includes schools that are not subject to sanction and schools that have withdrawn from the William D. Ford Federal Direct Loan (Direct Loan) Program. A school can only request an adjustment of its most recent official cohort default rate.

**Regulatory citations:**  
34 CFR 668.190  
34 CFR 668.209

The "timeframe begin date" is the sixth business day after the official cohort default rates are released as officially announced on the IFAP website:  
<http://ifap.ed.gov>

### ***What benefit will a school gain from submitting an uncorrected data adjustment?***

If, as a result of an uncorrected data adjustment (or as the result of a school's submission of any adjustment or appeal), the Department determines that a school's official cohort default rate data is incorrect, the Department will recalculate the cohort default rate using the corrected data. This may lower, raise, or not affect the cohort default rate. If the school is subject to sanction and the cohort default rate is lowered below the sanction level, the school is no longer subject to that sanction. In addition, a school that would otherwise be subject to sanction in a later year may avoid being subject to that sanction.

However, even though the Department may revise a cohort default rate, subsequent copies of the LRDR for the official cohort default rates will not reflect the change. Therefore, it is important for a school to keep a copy of the Department's final determination letter as the official record of the school's revised cohort default rate.

### ***What roles do data managers have in a school's uncorrected data adjustment?***

Schools submit uncorrected data adjustments directly to the Department via the eCDR Appeals system for review and consideration. The data manager associated with the uncorrected data is notified via email.

If the Department notifies a data manager that a school's uncorrected data adjustment was successful, the data manager must correct the data both in the data manager's internal system and in the National Student Loan Data System (NSLDS). The data manager must ensure that the changes are successfully loaded into NSLDS.

### ***How does a school submit an uncorrected data adjustment?***

All schools must submit their uncorrected data adjustment via the electronic Cohort Default Rate Appeals ([eCDR Appeals](#)) system. The eCDR Appeals system is a web-based application that allows schools to submit their uncorrected data adjustment allegations electronically, allows the data manager to respond electronically, and allows the Department to review the data manager response electronically. Submitting the uncorrected data adjustment electronically helps to ensure that each uncorrected data adjustment allegation is properly routed to the Department in a timely fashion. It also allows for greater protection of personally identifiable information. While the hyperlink above will take users directly to the eCDR Appeals homepage, a link to the eCDR Appeals system is also available from the [Default Prevention and Management website](#).

### ***How does a school register to use eCDR Appeals?***

All schools must complete the registration process in order to use the eCDR Appeals system. Complete instructions for registering for eCDR Appeals can be found in the [eCDR Appeals Registration and User Account Guide](#). A direct

link to this guide, as well as a link to a video demonstration of the registration process, can be found on the eCDR Appeals homepage.

### ***Where can a new user find guidance on submitting an uncorrected data adjustment using eCDR Appeals?***

The eCDR Appeals homepage contains a link to the [eCDR Appeals Incorrect Data Challenge User Guide](#). There are separate User Guides for each challenge, adjustment and appeal type that may be submitted using eCDR Appeals. Additionally, the eCDR Appeals homepage contains a link to video demonstrations for each challenge, adjustment and appeal type that may be submitted using eCDR Appeals.

### ***How does a school prepare an uncorrected data adjustment?***

If a school's LRDR for the official cohort default rate contains uncorrected data, it should submit an uncorrected data adjustment to the Department via eCDR Appeals.

The eCDR Appeals system will compare the LRDR for the draft cohort default rates to the LRDR for the official cohort default rates and the data manager's response to the school's incorrect data challenge to determine if agreed upon changes have been made. If this comparison indicates that the LRDR for the official cohort default rates contains uncorrected data, the eCDR Appeals system will send an email notification to the school informing the school that its official LRDR contains uncorrected data from the incorrect data challenge, and that the school should submit an uncorrected data adjustment via eCDR Appeals. The school should follow the instructions in the uncorrected data adjustment user guide to prepare and submit its uncorrected data adjustment. The school must do so within 30 calendar days of the timeframe begin date.

The uncorrected data adjustment must include the following items:

- ◆ A listing of all borrowers from the school's incorrect data challenge with uncorrected data. The eCDR Appeals system will automatically populate this listing into the "Requested Adjustments" table on the case details page after the school initiates the case.
- ◆ The CEO certification letter. This letter must be available in an electronic format and uploaded to eCDR Appeals. A sample CEO certification letter is provided at the end of this chapter.

### ***What happens after the school submits the uncorrected data adjustment?***

The Department will review the uncorrected data adjustment to determine whether a data manager correctly agreed to make a change to a school's cohort default rate data during the incorrect data challenge process and whether the change is reflected in the LRDR for the official cohort default rates. If the

A school will not have another opportunity to submit an uncorrected data adjustment.

Department so determines using the standard of review described in 34 CFR 668.189(f) or 668.208(f), as applicable, the Department will recalculate the school's cohort default rate based on the correct data.

After the Department completes its review of the uncorrected data adjustment, the department closes the case in eCDR Appeals. Once a case is closed, it will remain in the Current Cases listing for the remainder of the cohort year for viewing and printing; however, it can no longer be modified. Email notifications will automatically be sent to the school and to all data managers included in the case, informing them that the uncorrected data adjustment has been finalized and closed. At this point the schools and data managers can view and print the final determination letter, view and print the finalized case, and access all relevant reports available from eCDR Appeals.

If the school was notified that it was subject to sanction and the uncorrected data adjustment is successful and the revised cohort default rate is below the sanction level, the Department will withdraw that sanction notice. If the school was notified that it was subject to sanction and the uncorrected data adjustment is unsuccessful or if the uncorrected data adjustment is successful but the revised cohort default rate remains above the sanction level, and the school has no other outstanding appeals and adjustments, the Department will notify the school of the effective date of that sanction.

A school that submits an adjustment and/or an appeal but fails to avoid sanctions is liable for certain costs associated with the Direct Loans it originated and disbursed during the adjustment and appeal process. Liabilities are not calculated for loans that were delivered or disbursed more than 45 calendar days after the school submitted its completed adjustment and/or appeal to the Department. Schools may avoid this liability if they choose not to certify or originate loans during the adjustment and appeal process.

## Sample Letter: School to the Department



October 14, 2012

U.S. Department of Education  
Operations Performance Division  
Union Center Plaza 084F  
400 Maryland Avenue, SW  
Washington, DC 20202-5353

OPE ID 098998

Subject: Cohort FY 2010 Uncorrected Data Adjustment

To Whom It May Concern:

Coralville College, OPE ID 098998, is submitting a cohort FY 2010 uncorrected data adjustment. Please see the enclosed spreadsheet and a copy of the incorrect data challenge response from the data manager stating that a change is warranted.

Coralville College is submitting its uncorrected data adjustment at this time; however, the school is also planning on submitting an economically disadvantaged appeal.

I, the undersigned, certify under penalty of perjury, that all information submitted in support of this uncorrected data adjustment is true and correct.

Thank you for your consideration

Sincerely,

Serena Rooney  
President, Coralville College

Enclosures  
CC: Federal Servicer

*The letter must include the school's OPE ID number and a statement indicating that the school is submitting an uncorrected data adjustment for the current cohort fiscal year. The letter must feature a subject line that reads "Subject: Cohort FY [insert cohort fiscal year used in the adjustment] Uncorrected Data Adjustment". The school must also note if it is submitting any other adjustments or appeals. The letter must include a certification that the information provided is true and correct under penalty of perjury. The letter must also include a notation that the school is sending a copy of the letter and the spreadsheet to the relevant data managers. The school's President/CEO/Owner must sign the letter, and a signature block showing the signer's name and job title must follow the signature.*

# Uncorrected Data Adjustment Checklist

## School to the Department

### Determine

- Does the loan record detail report for the official cohort default rates contain incorrect data that a data manager agreed to correct?

### Submit to the Department

- Spreadsheet
- Copy of the Data Manager Uncorrected Data Adjustment Response.
- Letter