

### Reporting of Data by Institutions

When reporting information on GE Programs to ED, institutions must provide information on each GE Program offered by an institution during a given award year, and on identifiers of every student enrolled in a GE Program during that award year.

The National Student Loan Data System (NSLDS) is the repository for gainful employment data reported by institutions. Financial Aid Professionals can access NSLDS information for their institution at <https://www.nslsdfap.ed.gov>. Within the gainful employment record, the Office of Postsecondary Education Identification Number (OPEID) identifies the institution. Gainful employment reporting requires an eight-digit OPEID. The first six digits identify the institution, and the last two digits identify the specific location of the institution where the student attended the educational program. Report the award year field, which is always July 1 through June 30, using eight digits for the starting and ending calendar years. As an example, you would report the 2011-2012 award year as 20112012.

NSLDS access is necessary to report gainful employment data. New applications for NSLDS may take up to two weeks for processing. The Primary Destination Point Administrator (PDPA) at your institution can assist you in applying for NSLDS access. NSLDS users who intend to report gainful employment information for their institution must have *Enrollment Update* capabilities in order to access the GE pages.

The first submission of gainful employment data was to be sent to NSLDS no later than November 15, 2011. The gainful employment data reported in the first submission included the 2006-2007, 2007-2008, 2008-2009, 2009-2010, and 2010-2011 award years. The Secretary will establish the reporting deadline for each subsequent award year through an annual notice published in the *Federal Register*. The reporting due date for the 2011-2012 award year will be October 15, 2012.

If an institution is unable to report all of the required GE Program information, it must provide an explanation of why it cannot provide all or part of the required information. ED anticipates that such omissions will be rare for current GE Program data and will evaluate the reason(s) for missing information to determine any non-compliance with the reporting requirements. Institutions may report the types of missing data or other incomplete GE Program submissions via email to: [GE-Missing-Data@ed.gov](mailto:GE-Missing-Data@ed.gov).

The *Enroll* tab on the [NSLDS Professional Access website](#) contains the main gainful employment pages. The gainful employment options on the navigation bar are:

- GE List
- GE Reporting List
- GE Submittal

# GAINFUL EMPLOYMENT OPERATIONS MANUAL

## GE List



National Student Loan Data System (NSLDS)



[Menu](#) | 
 [Aid](#) | 
 [Enroll](#) | 
 [Org](#) | 
 [Report](#) | 
 [Tran](#)



[Enrollment Summary](#) | 
 [Enrollment Add](#) | 
 [Enrollment Update](#) | 
 [Enrollment Reporting Schedule](#) | 
 [Exit Counseling Submittal](#) | 
 [GE List](#) | 
 [GE Reporting List](#) | 
 [GE Submittal](#)

FSA ID: NSL\_SCTST11.FSA logged on as: TRACY ONLINE-TRAINER from NORTH\_SOUTH UNIVERSITY / TGZZ011 / SCTST11

### Gainful Employment List

Add Gainful Employment

Sort By:

Display Only:

Location Code:

Award Year:

Student SSN:

CIP Code:

Credential Level:

Program Attendance Status:

Program Attendance End Date Begin:

Program Attendance End Date End:

History:

#	SSN	Name	DOB	Active
	<b>Institution</b>			
	***-**-9999	LOHMAN, JULIE R	02/12/1982	YES
1	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 05/01/2006 - 12/08/2006	Attendance Status: WITHDREW Credential Level: ASSOCIATE'S DEGREE
	***-**-0000	RICE, DENISE	10/12/1952	YES
2	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 03/27/2006 - 07/20/2006	Attendance Status: WITHDREW Credential Level: ASSOCIATE'S DEGREE
	***-**-0001	ROBERSON, MILDRED	10/06/1943	YES
3	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 03/27/2006 - N/A	Attendance Status: ENROLLED Credential Level: ASSOCIATE'S DEGREE
	***-**-0002	ROBERTS, MABEL	02/02/1986	YES
4	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 11/07/2005 - 08/03/2006	Attendance Status: WITHDREW Credential Level: ASSOCIATE'S DEGREE
	***-**-0003	SANDIFER, ALICIA L	07/13/1982	YES
5	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 06/21/2006 - N/A	Attendance Status: ENROLLED Credential Level: ASSOCIATE'S DEGREE
	***-**-0004	STEEN, MONICA	05/20/1984	YES
6	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 01/05/2006 - 08/29/2006	Attendance Status: WITHDREW Credential Level: ASSOCIATE'S DEGREE
	***-**-0005	SWAGERT, KATIE S	11/10/1982	YES
7	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 02/13/2006 - 09/25/2006	Attendance Status: WITHDREW Credential Level: ASSOCIATE'S DEGREE
	***-**-0006	TERRELL, HODEN D	02/21/1969	YES
8	06789900 - NORTH SOUTH UNIVERSITY			
	Award Year: 2006-2007	CIP Code: 500408	Attendance Begin - End Date: 02/13/2006 - 08/22/2006	Attendance Status: WITHDREW Credential Level: ASSOCIATE'S DEGREE

PRIVACY ACT OF 1974 (AS AMENDED)

## GE Reporting List

National Student Loan Data System (NSLDS)

START HERE  
GO FURTHER  
FEDERAL STUDENT AID

NSLDS

Menu | Aid | Enroll | Org | Report | Tran

Enrollment Summary | Enrollment Add | Enrollment Update | Enrollment Reporting Schedule | Exit Counseling Submittal | GE List | **GE Reporting List** | GE Submittal

FSA ID: NSL.SCTST11.FSA logged on as: SGTST11 ONLINE SCHOOL TESTING from NORTH SOUTH UNIVERSITY / TGXX011 / SCTST11

Name: NORTH SOUTH UNIVERSITY  
Code: 06789900      Type: School

### Gainful Employment Reporting List

The following SAIG mailboxes are currently able to report Gainful Employment information for your school and location.

OPEID	SAIG Mailbox
06789900	TGXX011

PRIVACY ACT OF 1974 (AS AMENDED)

FOIA | Privacy | Security | Notices      WhiteHouse.gov | USA.gov | ED.gov

## GE Submittal

National Student Loan Data System (NSLDS)

START HERE  
GO FURTHER  
FEDERAL STUDENT AID

NSLDS

Menu | Aid | Enroll | Org | Report | Tran

Enrollment Summary | Enrollment Add | Enrollment Update | Enrollment Reporting Schedule | Exit Counseling Submittal | GE List | GE Reporting List | **GE Submittal**

FSA ID: NSL.SCTST11.FSA logged on as: SGTST11 ONLINE SCHOOL TESTING from NORTH SOUTH UNIVERSITY / TGXX011 / SCTST11

Name: NORTH SOUTH UNIVERSITY  
Code: 06789900      Type: School

**i** Enter the location and file name and submit for processing.

### Gainful Employment Spreadsheet Submittal

I am running on Windows.

File Name:

PRIVACY ACT OF 1974 (AS AMENDED)

FOIA | Privacy | Security | Notices      WhiteHouse.gov | USA.gov | ED.gov

You may report electronically either by batch or online. An institution may use either or both methods for gainful employment reporting.

**TIP:**  
Do not report the same data using both methods.

## REPORTING VIA THE BATCH PROCESS

Reporting via the batch process is through the Student Aid Internet Gateway (SAIG). Batch processing allows an institution to choose between two file formats: Fixed Width and Comma Separated Value (CSV or comma delimited).

To ensure the successful submission of batch files through NSLDS, schools must enroll on the [SAIG Enrollment website](#) in order to designate the TG Mailbox that will be used to submit their gainful employment data. An institution may use the SAIG Mailbox used for its other Title IV related batch functions, or select another separate SAIG mailbox for gainful employment. The SAIG mailbox is the transmission vehicle

for electronic communication with ED. Remember to include the letters “TG” with your mailbox number. For an institution without an SAIG mailbox, the SAIG Enrollment website will provide an explanation of how to obtain and use the mailbox. This site is [www.fsawebenroll.ed.gov](http://www.fsawebenroll.ed.gov).

The *GE Reporting List* will show all locations of an institution and designated SAIG mailboxes.

In batch reporting, each gainful employment file submitted must contain a single header record, student detail records, and a single trailer record. The header record identifies the source of the file, the creation date, and other identifying information. Each detail record contains information about one student. You must format all detail records according to the record layout and field definitions provided in [Appendix A of the NSLDS Gainful Employment User Guide](#). The trailer record shows the number of detail records contained in the file.

When NSLDS receives batch files, the system will respond with an error/acknowledgment file within 36 hours after processing of the institution’s submission. It will contain one header record, one trailer record, and may contain multiple detail records. A detail record will be included only if the submitted record contained at least one error. NSLDS will identify up to five errors per record. Institutions must return corrected error files as soon as possible. If the error/acknowledgment file contains no detail records, the system accepted all records with no errors. NSLDS will still send an error/acknowledgment file to document receipt of the data. Please contact NSLDS Customer Support Center at 1-800-999-8219 if your institution does not receive an error/acknowledgment file.

Error codes are three numeric digits. For example, the error code 001 means that a required field was not entered. The error code 018 means that you should exclude the specific field in this detail record, based upon the value input for another field in that record. For more information on error codes, refer to [Appendix A of the NSLDS Gainful Employment User Guide](#), which provides the error codes for each data item in a detail record.

Message classes, which identify the type of file sent across SAIG, must meet certain rules and must be uniquely named. For gainful employment data exchanged via batch, the message classes are:

- **GESFLEIN** – School submittal in fixed width format
- **GESCDEIN** – School submittal in comma separated value format
- **GERFLEOP** – NSLDS response file in fixed width format
- **GERCDEOP** – NSLDS response file in comma separated value format

## REPORTING ONLINE

Reporting online is done using the [NSLDS Professional Access website](#). Remember that to use NSLDS online, you must use Microsoft Internet Explorer, version 5.0 or higher. For security purposes, you must encrypt all transmissions. That means that the browser must use secure socket layer (SSL) encryption that supports 40 bit, 56

# GAINFUL EMPLOYMENT OPERATIONS MANUAL

bit, or 128 bit. We recommend using the highest level of encryption, 128 bit. The institution's Primary Destination Point Administrator may provide NSLDS access to another employee new to NSLDS. An institution may request access to NSLDS at [fsawebnroll.ed.gov](http://fsawebnroll.ed.gov), following the directions for *Initial Enrollment for Services*.

Online reporting provides two options. The first is to add students individually, using direct online entry. The second is to upload gainful employment records for multiple students using the NSLDS GE Submittal Template.

For individual student entry online, access is through the *GE List* page, within the *Enroll* tab. After accessing that page, the user will see a button to *Add Gainful Employment*. Add each student as a single record. You must click *Submit* to add the record to the system. The *Gainful Employment Add* page is displayed below.

## Gainful Employment Add

**Student Details**

SSN:

First Name:

Middle Name:

Last Name:

Date of Birth:  (MMDDCCYY)

**Gainful Employment Details**

Award Year:  (ex.: 20102011)

Institution Code (OPEID): 067899

Institution Name:

GE Program Indicator:

Program Name:

CIP Code:

Credential Level:

Medical or Dental Internship or Residency:

FFEL or Direct Loans:

Program Attendance Begin Date:  (MMDDCCYY)

Program Attendance Begin Date for This Award Year:  (MMDDCCYY)

Program Attendance Status:

Program Attendance End Date:  (MMDDCCYY)

Private Loans Amount:

Institutional Financing Amount:

Tuition and Fees Amount:

Enrolled in Another Program:

CIP Code of Other Program:

Credential Level of Other Program:

Program Name of Other Program:

GE Program Indicator of Other Program:

OPEID of Other Program Institution:

Institution Name for Other Program:

PRIVACY ACT OF 1974 (AS AMENDED)

NSLDS allows for the upload of multiple records at one time when using the GE Submittal Template. Prior to the upload, an institution must retrieve the template at the Federal Student Aid (FSA) download website, [fsadownload.ed.gov](http://fsadownload.ed.gov). The template and a download guide are both available at this site. The GE Submittal Template is required because it is specially designed and formatted to be accepted by NSLDS. User-created spreadsheets containing the same information will not be accepted by the system.

### **GE Submittal Template**

	A	B	C	D	E	F	G	H	I	J
1										
2	Award Year	Student Social Security Number	Student First Name	Student Middle Name	Student Last Name	Student Date of Birth	Institution Code (OPEID)	Institution Name	GE Program Indicator	Program Name
3	20072008	000009913	James	A	Brown	10/1/1988	06789900	North South University	Y	Complete Engine Rebuild
4	20082009	000009913	James	A	Brown	10/1/1988	06789900	North South University	Y	Complete Engine Rebuild

An institution must download the template, enter the required data, and save the spreadsheet. This template is an Excel 2003 file. You can save the file in Excel 2003 format (.xls) or in Excel 2007 format (.xlsx). Password protect the spreadsheet to preserve the integrity of the personally identifiable information within it.

## DOWNLOADING NSLDS GAINFUL EMPLOYMENT SUBMITTAL TEMPLATE SPREADSHEET FROM FSADOWNLOAD

The NSLDS Gainful Employment Submittal Template spreadsheet is available for download from the [fsadownload.ed.gov](http://fsadownload.ed.gov) website, in Excel 2003 format. You can download it to your local hard drive and access it by double-clicking it or by launching the MS-Excel application, then opening the template spreadsheet.

### **To Download the NSLDS Gainful Employment Submittal Template Spreadsheet:**

1. Go to the address field located at the top of your Web browser's window and type [fsadownload.ed.gov](http://fsadownload.ed.gov). You may need to press the Enter key or click the Go button.
2. Click the Software link on the left side of the page or the Software and Associated Documents link at the top of the page.
3. Click the NSLDS Gainful Employment Submittal Template spreadsheet link. This will take you to the download site.

**NOTE:**

**If you plan to use the GE Submittal Template to upload all of your GE records, be sure to rename the files so that they are easily identifiable.**

4. Click the XLS Format link in the Software section to Download/Save the file. At the File Download dialogue box, click the Save button. Then designate the folder/location on your local hard drive and click Save.
5. Navigate to the folder/location with Windows Explorer and double-click the spreadsheet OR launch the MS-Excel application. Then select File|Open and navigate to the folder/location to open the spreadsheet. You can start entering your gainful employment records. You may enter up to 50 records per spreadsheet. Save the spreadsheet after entering your data.
  - a) If you have the option to open the spreadsheet with MS-Excel, then select File|Save As, saving a copy to a folder/location on your local hard drive. You can start entering your gainful employment records. Save the spreadsheet after entering your data.
  - b) If the File Download dialogue box does not prompt you to save the spreadsheet, or your MS-Excel application does not launch, then click your Web browser's back button. Navigate back to the XLS Format link, right-click it, and select Save Target As... to designate the folder/location in which you want to save the spreadsheet. Select Save.

Once the template is complete, you can access the upload function on the *GE Submittal* page, within the *Enroll* tab. The submittal page allows the institution to search for the appropriate file in its stored location using the *Browse* function. After locating the file, click *Submit* to upload the spreadsheet into the *GE Spreadsheet Add* page. The *Add* page will display the contents of the spreadsheet by row. The data is then ready for review. After review, you must indicate which rows or records you want the system to edit.

You may either check the box for each individual record or select *Check All*. NSLDS will apply edits to the data. A message will display stating if, and how many of, the records were successfully added to the database. The system will only apply information to the database that has passed the edits. Any records containing errors will display for correction, and the error(s) can be seen by hovering over the red indicator. This is displayed in the following diagram.

You will need to correct any records that do not pass the edits. You can do this within the same spreadsheet by correcting the records containing errors and resubmitting the spreadsheet with the corrected records. To avoid duplication, do not alter the records that were successfully uploaded. Doing so will create additional records. You can also submit a new spreadsheet, including just the corrected records.

## Gainful Employment Spreadsheet Add



START HERE  
GO FURTHER  
FEDERAL STUDENT AID

National Student Loan Data System (NSLDS)

Menu Aid Enroll Org Report Tran





Enrollment Summary | Enrollment Add | Enrollment Update | Enrollment Reporting Schedule | Exit Counseling Submittal | GE List | GE Reporting List | GE Submittal

FSA ID: NSL.SCTST11.FSA logged on as: SCTST11 ONLINE SCHOOL TESTING from NORTH SOUTH UNIVERSITY / TGXX011 / SCTST11

Name: NORTH SOUTH UNIVERSITY  
Code: 06789900    Type: School

**Gainful Employment Spreadsheet Add**

 2 records have been successfully added.

 Unable to process information for records identified by error icon(s). Please place cursor over the icon(s) for details.

✓ Check All
Line item numbers match to rows in the spreadsheet.

<input checked="" type="checkbox"/>	SSN: 000-00-9113	NAME: Georgia Brown	DOB: 09/01/1987
	OPEID: 06789900	INSTITUTION NAME: North South University	
Enrollment Data:	Award Year: 20082009	GE Program Indicator: Y	Program Name: Hair Design
	CIP Code: 999999	Credential Level: 01	Medical or Dental Internship or Residency: N
	Program Attendance Begin Date: 09/01/2008	Program Attendance Begin Date for This Award Year: 09/01/2008	FFEL or Direct Loan: N
	Program Attendance End Date: 10/03/2008	Private Loans Amount: 600	Institutional Financing Amount: 0
Post Enrollment Data:	Enrolled in Another Program: N	CIP Code of Other Program:	Tuition and Fees Amount:
	Program Name of Other Program:	GE Program Indicator of Other Program:	Credential Level of Other Program:
	OPEID of Other Program Institution:		
	Institution Name for Other Program:		

PRIVACY ACT OF 1974 (AS AMENDED)

Regardless of the method of entry, an institution may use the online functionality to view gainful employment records that the institution has submitted to NSLDS. After clicking *Retrieve*, the *GE List* page provides an overview of records for all reported award years. Institutions may set parameters, such as award year or Social Security Number (SSN), to narrow the data retrieved. The *Gainful Employment Detail* page provides complete information reported about a particular student, in a particular program, at a particular institution. You can access this page from the *GE List* page by selecting the button next to the specific student record.

You may also use the online functionality to correct, update, or deactivate any previously reported information. Clicking the *Update* button at the top of the *Gainful Employment Detail* page allows the user to make corrections or updates.

The system validates any changed information. You must correct all errors for a proper submission. You may not update the *award year*, *SSN*, *CIP code*, *Credential Level*, and *date* fields online. If any of these are incorrect, you must deactivate the old record and create a new record for the student. To deactivate a record, click the *Deactivate* button at the top of the *Gainful Employment Detail* page and confirm the deactivation on the *Gainful Employment Deactivate* page.

Remember that for security purposes, NSLDS will time out after 30 minutes of inactivity. Any data you enter on the screen, but do not submit before NSLDS times out, will be lost. NSLDS will provide a warning pop-up button three minutes before the page times out. Clicking on this button will reset the clock for another 30 minutes.

---

---

## GAINFUL EMPLOYMENT OPERATIONS MANUAL

---

---

Institutions must report specific required data elements for each award year as described in regulation and explained here. The institution must report each GE Program by name, Classification of Instructional Program (CIP) code and Credential Level.

The program name is the name as determined by the school. Visit <http://nces.ed.gov/ipeds/cip2010> for a list of CIP codes. See below for a list of the GE Credential Levels. For each program, submit data to NSLDS for each student enrolled at any time in the reported award year.

For all students who were enrolled in a GE Program during the reported award year, the institution must report student specific information. The student identifiers are:

- SSN
- First Name
- Middle Name or Initial
- Last Name
- Date of Birth

The gainful employment details of the student's enrollment must include the school's OPEID and name, program name, CIP code, and Credential Level. Credential Level identifies the expected result of the program of study. There are seven reporting options:

- 01 - Undergraduate certificate or diploma program
- 02 - Associate's degree
- 03 - Bachelor's degree
- 04 - Post baccalaureate certificate or post master's certificate
- 05 - Master's degree
- 06 - Doctoral degree
- 07 - First professional degree

Currently, the gainful employment record includes an indicator of disbursement for Federal Family Education Loan (FFEL) or Direct Loan funds for the period of the student's attendance in this educational program. Note that the loan may have been disbursed in a previous award year. For future reporting years, the field will be deleted.

The record also includes an indicator of whether the program includes a medical or dental internship or residency. This is required because those programs will have the Debt Measures calculated using the sixth and seventh prior fiscal years, as opposed to the third and fourth. Institutions should indicate "Y" for yes, only if the students will complete the program with a doctor of medicine, doctor of osteopathy, or doctor of dental science degree and a Credential Level of 06-Doctoral degree or 07-First professional degree.

Additional student specific information includes the program attendance begin date, the program attendance begin date for the award year, and the program attendance status. The first date is the student's enrollment date in the program of

study, which may be in a prior award year. The second date is the date in the reported award year on which the student began attendance. If the enrollment continued from the prior award year, use the first date of the award year reported. Report the student's status (*completed*, *withdrawn*, or *enrolled*) and the date the student obtained that status. If the student is still enrolled on June 30 of the award year being reported, use that date. For completed and withdrawn students, you must report the student's end date in the program. This includes both students who are no longer enrolled at the institution and those that completed the program but remained at the institution to pursue an additional credential.

In order to determine debt levels incurred for the program of study, the institution must report on private education loans and institutional financing plans of students who completed and withdrew during the reported award year. Report both numbers in whole dollars, by individual student. For private education loans, report the gross amount received by the student for any period of enrollment in this program of study. The amount reported is not limited to dollars borrowed in the award year reported. Remember that private educational loans are loans issued expressly for postsecondary education expenses and do not include Title IV loans. For institutional financing plans, report the total amount owed by the student upon completion or withdrawal. You may also provide the total amount of tuition and fees charged the student during his enrollment. These charges include all charges for the program of study, not just for the award year reported. Reporting tuition and fees is optional but may be beneficial to the institution. If reported, the tuition and fees for the student will be compared to the loan debt the student incurred for the program. The lower of the two will be used to calculate the median loan debt for the program. If you have many students borrowing for living costs, the tuition and fees will be lower than the loan debt incurred by those students. This results in a benefit to the institution.

Currently, you must report information on a student who has completed one program, but continued enrollment at the institution in another program. If a student began a higher credentialed program at the reporting school, or transferred to a higher credentialed program at another school, you must report the information that you know. When the enrollment is at your school, you must report additional information on the other GE Program. This includes the CIP code, the Credential Level, and the program identifiers.

Remember that you must report any student enrolled in more than one GE Program separately for each program. You must report a student who "stopped out" and re-entered the same GE Program during the same award year separately for each period of enrollment. Additionally, you must report separately for each award year, a student enrolled in the same GE Program during multiple award years.

### SSN CONFLICTS

To ensure that NSLDS contains the most accurate data, data providers, such as guaranty agencies and ED servicers, may not load information into NSLDS on two different students with the same SSN. As data providers of gainful employment information, institutions must comply with the same identifier matching criteria. This matching process occurs at the time that data is first loaded into NSLDS.

If a student record is already in the NSLDS database, and the identifiers provided by the organization attempting to load the record do not match what is currently in the database, the system generates an SSN conflict error. This error notifies the data providers that the SSN is in use by another student.

The institution must research the accuracy of the student identifiers reported in the gainful employment data submission. This may include contacting the data provider who supplied the initial information to NSLDS or contacting the student.

To assist in this research effort, NSLDS provides the *SSN Conflict* page, which allows users to display a list of the data providers that have previously reported on the SSN that is in error. The *SSN Conflict* page is located on the *Aid* tab. In order to utilize this function, click on *SSN Conflict* in the menu bar, enter the student's SSN, and click the Submit button. The list of one or more data providers will show the previously reported SSN on the screen. Contact one of the organizations for information regarding this SSN. Each of the organizations listed will have the same identifiers for the student.

ED has included guidance related to SSN conflict resolution in the *NSLDS Gainful Employment User Guide*, [Electronic Announcement #28](#), and [FAQ R-Q25](#). If your institution follows this guidance and is still unable to resolve the SSN conflict, it is not necessary to report that student to NSLDS. ED will consider the institution to have met the gainful employment reporting requirement for that student if it maintains documentation of the steps taken in attempt to resolve the SSN conflict.