Incorrect Data Challenge

Objective

- Remove incorrect data and ensure that all appropriate data is accurately included in a school’s draft CDR:
  - Did all included borrowers truly enter repayment on their loans during the cohort year?
  - Did all included defaults on those loans occur during the applicable monitoring period?
  - Did any excluded borrowers enter repayment during the cohort year and not default within the period?

Which schools can use this challenge?

- Any school with a draft CDR that includes inaccurate data or excludes relevant data can use this challenge.

When may a school use this challenge?

- When a school receives its draft CDR in February, it must submit this challenge within 45 days of the timeframe begin date. The timeframe begins on the sixth business day after ED releases the draft CDRs.
- If a timely challenge is not submitted, a school cannot later request a correction of the inaccurate data when its official CDR is released, unless the school qualifies for an Uncorrected Data Adjustment or is subject to CDR-based sanctions and is eligible to file an Erroneous Data Appeal.

Is there a fee associated with this type of challenge?

- There is no charge to a school to submit an Incorrect Data Challenge if it performs its own research.

What are the steps in the challenge process?

1. Review the draft Loan Record Detail Report to identify any incorrectly included or excluded data.
2. Use ED’s eCDR Appeals system to request a review of incorrect data by the data manager(s).
3. Data manager responses to change requests are provided within 30 days via the eCDR system.
4. If a data manager agrees that data changes are warranted, NSLDS will be updated accordingly.
5. ED reviews all data manager responses to ensure that accurate determinations are provided.
6. If ED agrees with data changes, the revised information will be used to calculate the official CDR.

What happens if the challenge is unsuccessful?

- A school is not subject to sanctions based on a draft CDR.
- Unsuccessfully challenged data can be expected to reappear in the official CDR.
- As indicated above, an Incorrect Data Challenge is intended to eliminate errors from the CDR. However, it also provides a school with opportunities to file a request for adjustment or appeal of the official CDR, if it includes inaccurate data that a data manager agreed to change, or disputed data that a data manager did not agree to change if the school is subject to sanctions based on its official CDR. These opportunities are not available to a school that does not submit an Incorrect Data Challenge when its draft CDR is released.

Where can a school learn more about this type of challenge?

- Federal regulations: §668.204(b)

For more CDR information:
Visit www.TG.org/CohortDefaultRates or contact TG Default Aversion at defaultaversion@tgslc.org.