

CommonLine & The Common Record: The building of convergence.

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Common Record

With the U.S. Department of Education's (ED) launch of the Common Origination and Disbursement (COD) system in May 2002, the Federal Student Aid Office (FSA) converged three legacy stovepipe systems (Direct Lending, Pell Grants, and Campus-based) into one – COD. The COD system uses XML technology which is designed for real-time data exchange and transactions.

The Common Record is a new standard within the student financial aid community. The Common Record standardizes the data elements, definitions, edits and structure across Pell Grants and Direct Loans. It is a "flexible record" that can also be used for the Federal Family Education Loan Program (FFELP).

Members of the National Council of Higher Education Loan Programs (NCHHELP) and the Postsecondary Electronic Standards Council (PESC) assisted with the development of the Common Record. This collaborative effort enables the Common Record to bring consistency and standardization to the transmission of student financial assistance data.

While schools will continue to exchange a lot of the same Direct Loan and Pell Grant data; Common Record takes advantage of commonality across programs to maximize the use of common data elements and edits so schools can eliminate sending redundant student identifier information. Student and parent recipient data, such as name, social security number, date of birth, and other non-program specific data will be stored once, so a student/recipient will have one identifier record in COD for all programs. Edits that relate to general school and student eligibility will also be the same across programs. Then program specific data, such as Direct Loan disbursement amounts, will have unique program data elements and edits.

ED will phase in the implementation of Common Record over the next three years. All schools must become full participants for the 2004-2005 award year, which means at that time all schools, third party software providers and servicers must be able to send and receive data in XML-based Common Record formats (see Table I, II, and III). Federal Student Aid's EDEExpress software product will not have a Common Record module for the 2002-2003 award year, and schools will continue to exchange data in legacy formats. FSA plans to have EDEExpress directly support Common Record for the 2004-2005 award year. Until then, all data received in legacy formats will be translated into Common Record then processed by FSA. Results will be produced by COD then translated back into legacy formats. This approach has allowed a 100% cutover to COD for FSA and integration of individual legacy systems that can then be retired as needed.¹

Why Convergence?

FFELP and alternative loan programs service providers are committed to expanding the benefits of the Common Record. Through NCHHELP's Electronic Standards Committee (ESC), which brings together various FFELP and alternative loan service providers along with software developers, convergence has been one of the major goals. Convergence is defined as "moving toward union or uniformity." The ESC and FSA have agreed that convergence as it relates to CommonLine and the Common Record is taking the best of all programs and creating a new standard, not adoption of one standard over another. However, it must be made clear that FFEL, Alternative Loan providers and FSA will review each point of change necessary for convergence in light of what the costs associated with implementation will be. For example, if it will cost FSA millions of dollars to implement a particular change, strictly for the benefit of convergence, it will most likely not be changed and the standards may differ in these areas as they are defined.

FFEL and Alternative Loan providers should look at the CR as an opportunity to provide streamlined efficient processes to their school customers and to the school software developers. However, providing this opportunity does not come without a cost. While schools and software developers will realize short and long term efficiencies, many service providers, as in any systems change, will incur significant up front costs. However, these will hopefully be recouped through long term efficiencies.

Some of the many benefits of convergence are as follows:

- Ease of programming one format across multiple financial aid programs
- Better utilize resources – financial and staff
- Continuation of standardization efforts

The ESC Response

In late Fall 2001, the NCHHELP ESC formed an XML Workgroup to review the potential of developing a version of CommonLine in an XML format. In January 2002 the XML workgroup presented the results of their discussions and a transition strategy to the full ESC. After much deliberation and discussion, the group concurred on the following strategy for migration to XML:

¹ For more information on Common Record or COD, visit <http://fap.ed.gov/IFAPWebApp/currentCODPag.jsp>

Step One: Finalize and agree upon a common schema for CommonLine and develop the FFELP portion of the Core Components dictionary in collaboration with the PESC XML Forum for Education. This process would align the FFELP data elements with the Common Record to ensure convergence of the data tags and record blocks and be used in the development of the schema. (A schema provides specific definition rules and constraints on how the XML elements are processed) No reengineering of business processes will take place in this development. This step will use the existing Common Record data names whenever possible.

Step Two: The ESC agreed that wide support of the XML version of CommonLine is critical for the success of this initiative. To address this, a team was formed to further research the feasibility of building a universal translator of CommonLine Release 5 to CommonLine XML. This team was comprised of both IT and business analysts. It was intended that this team would review and determine the best way to build free, open source software that can be utilized by the FFELP.

Step Three: The ESC agreed that a straight translation of CommonLine Release 5 to XML does not go far enough for the long-term strategy. Therefore, the ESC would need to continually work with ED on developing further convergence.

Concurrently, some FFEL participants formed a group called Project Genesis, now referred to at the CommonLine Common Record Convergence Group (CCCG), to look at development of an alternate proposal for convergence. This proposal's key concepts included a change transaction process that mirrors the Direct Lending model and also accelerates the implementation of Common Record for FFEL and alternative loans.

In April of 2002, a meeting of CCCG representatives and ESC members was held to discuss how the ESC could move more quickly on the convergence efforts. The goals of this meeting were as follows:

- Review the CommonLine change transaction business process to simplify and streamline the process for schools. Analyze the impact that re-engineering will have on FFELP processing by comparing the CommonLine process to the business process used by COD for similar transactions.
- Align the data necessary to support FFEL processing to data used in the COD process where allowed and as makes sense. Differences should be minimized to inherent differences in the process or policy between the programs.
- The XML data structure will be based on the current PESC XML Forum core data dictionary and schema structure.
- Identify ways to help accelerate the adoption and acceptance of this initiative, and make suggestions for industry implementation.

In May, the full Electronic Standards Committee met and agreed that by 7/1/02, we must provide details to the Department of Education as to what we need added to the Common Record layout (i.e. what elements are needed, any changes to structure. The Department did not need our final schema). The Department will then build in the changes identified by ESC and ESC will continue down the path of ultimate convergence with the Common Record. Consensus was reached on our approach to move the CommonLine XML project forward in this manner.

At this point in time, the ESC recognized that we needed to develop a process that can be mapped back to CommonLine flat file formats, as we cannot completely reengineer the process in time for April 2003. Additionally, the ESC recognized that we need to work on additional reengineering but at this point must focus on what we need for the upcoming year. The ESC's plan is for a process that all parties can adopt but that will also allow for streamlining in the future.

In June 2002, FSA, FFELP and alternative loan service providers collaborated to refine data definitions, tags, and block structure of the Common Record version 2.0 for the 2003-2004 award year. This information has been forwarded to FSA for inclusion in version 2. Although this version of the Common Record has significantly streamlined the change transaction process, there are some data elements that have remained to allow organizations to be able to create a CommonLine 5 flat file from information received in the Common Record. A one-for one straight translation (the original goal of the ESC in January 2002) did not take place as it was determined that many of the data elements needed in CommonLine R5 could be derived from other elements in the Common Record. It was envisioned that this "mappable" version of the Common Record would allow organizations who do not have their systems ready to process the Common Record to still accept a Common Record format and translate it to a CommonLine R5 format for actual processing.

In July 2002, at the ESC meeting, it was reported that the Project Genesis group had dissolved yet there is a small group, the CommonLine/Common Record Convergence Group (CCC Group) working to develop documentation to serve as a Proof of Concept plus additional details in support of their alternate proposal. The documentation would detail the convergence of business processes between CommonLine and the Common Record. The CCC Group stated that they would also add examples of how business processes would be impacted and identify the differences in changes with CommonLine and the convergence process. The documentation developed would then be turned over to the ESC Re-engineering Subcommittee to provide a head start and assist in the reengineering efforts. The CCC Group also reported that if the ESC XML Re-engineering Subcommittee determined that the concepts turned over to them by the CCC Group are not possible to implement that the CCC Group will be comfortable with the decisions of the ESC Re-engineering Subcommittee since everyone's interest is the best interest of the schools.

Most recently, the ESC Re-engineering Subcommittee met in August to continue to convergence work. The goals of this three-day meeting were to review the document that was created by the CCC Group, and to create a proposal to give to the full ESC at the September 2002 meeting. A conference call was also held at the meeting with the ESC School Advisory Team to gain further information on designing the reengineered process to meet the needs of the schools. A great deal of work was accomplished at the meeting and a goal of finalizing completed documentation by 12/2002 was agreed upon. The group continues its work through bi-weekly conference calls. It is expected that the proposal will be discussed and reviewed by the full ESC in September.

The group also finalized the mission statement for the ESC Re-engineering Subcommittee. It is as follows:

The mission for Common Record/CommonLine Convergence is to design a single standard XML-based Common Record to support all financial aid programs, including FFEL and Direct Lending, eliminate multiple flat files, and provide a simplified process for the submission of financial aid data by schools and their SIS partner. The initial effort will focus on incorporating FFELP business flows into the Common Record, merge like terms and processes between the various programs and capitalize on the efficiencies of the XML technology. The resulting system standards will still allow each program to maintain features within the Common Record that are unique to their program and business processes. In addition, this effort will develop/produce specifications and proposed standards which take into account existing FFEL industry standards and the need to support translations between specifications as well as an anticipated phased adoption and implementation of the new specifications by SIS vendors and the FFEL community. Future convergence activities will look to further streamline the process within Common Record.

There were two ESC meetings held in September that dealt with the convergence efforts of CommonLine. The first was a meeting of the full ESC. At the conclusion of this meeting, it was decided to continue to move forward with the development of a re-engineered process for convergence with the Common Record. At the committee's next meeting in November, a half day meeting will take place with the committee, FAMS/SIS vendors, and school representatives. This meeting will focus on the work of the XML re-engineering Subcommittee and is designed to present what has been developed thus far to the schools and vendors. At this time, it is expected that the vendors will validate the direction the ESC team is taking or agree to a change in direction. It is also expected that open issues will be negotiated with the schools and vendors. Documentation for this meeting will be completed by 10/30/2002 and distributed to the attendees.

The ESC has also submitted the mappable versions of the converged process to the PESC XML Forum for Education for assistance in development of the schemas. Only the Application Send, Response and Disbursement information has been sent as these processes are very similar in both the mappable version and in the reengineered version. Once the final adjustments have been made to the re engineered version, these changes will also be submitted to the Forum.

The second meeting was of the XML re-engineering Subcommittee. Here the workgroup continued to work out the details of the change transactions for convergence with the Common Record. This team will be responsible for the development of the documentation for the November meeting. Additionally, in order to better facilitate meetings and to ensure that a proposal is completed by the end of October, the size of this team has been adjusted. The full proposal, however, will still need to be reviewed and approved by the full ESC in the near future. In the interim, the team leads, in conjunction with NCHelp have revised the workgroup to include the following individuals:

Nanci Twardowski	Access Group
Jennifer Sneyder	AES
Lori Shaffer	Apollo Group
Barry Needalman	ASA
Linda Katrinic	Baker College
Debra Urias	Brazos
Michelle Jarzyniecki	Citibank
Steve James	College Board
Marcia Paterson	CSLP
Ron Harding	Datatel
Holly Hyland	ED
Kathy Monroe	EdFund
Kristi Blabaum	Educaid
Linda King	ELM
Ramiro Amezcua	ELM
David Steiner	FES
Lisa Oldre	Great Lakes
Fred Highsmith	Guarantec
Matt Downey	HESC
Tadd Hatch	Iowa Student Loan
Betty Hansmann	ISAC
Erin Rose	Key Bank
Ralph LeCompte	KHEAA
Tim Cameron	NCHelp
Heidi Kovalick	NJ HESAA

Rick Johnson	NSLP
Jeffrey Funck	PHEAA
Barbara Fong-Portier	Peoplesoft
Kim Shiflette	Sallie Mae
Rhonda Allen	SCT/Banner
Cliff Clevenger	Sigma
Kyle Smith	TGSLC
Nancy Ninas	U of Wisconsin
Carrie Steere-Salazar	UCSF
Vicki Codd	US Bank
Brian Allison	USA Funds
Dave Olson	Utah SBR

From October 7th through the 9th, the Re-Engineering Sub Committee held a special meeting to continue the momentum gained over the previous months efforts. At this meeting, the team finalized plans for the November presentation to the SIS vendors and schools. On November 11th, members of the re-engineering team, members of the ESC leadership team, and the Electronic Standards Steering Committee will meet with SIS Vendors and schools to present the work completed to date by the re-engineering team. The purpose of the meeting is to ensure that the direction the team is taking is acceptable to the vendors and schools that will implement the new process. It is expected that the participants will provide their commitment to implement the process or to identify specific points that will need to be negotiated with the full team. The success of this project is contingent on the commitment of the SIS vendors and schools to actually implement the process. On November 12th, the full ESC will convene and review the outcome of the school/vendor meeting. Final direction for this initiative will be discussed with the full ESC. The re-engineering team have also begun looking at a proposed implementation schedule that will be reviewed at both of these November meetings. The proposed timeframe for development and implementation is as follows:

- 12/15/2002 All open issues to be brought to closure
- 04/01/2003 First draft of documentation completed
- 06/01/2003 Final documentation completed and distributed
- 12/01/2003 Testing begins
- ~~04/01/2003~~ 04/01/2004 Industry implementation begins (NOTE: this date modified by ISAC staff on November 18, 2002)

Next Steps

All schools will be required by FSA to use and process Common Record in 2004-2005. Schools not participating in Direct Lending will still need to use and process Common Record for Pell Grants, and also the FFELP and alternative loan standard, presently CommonLine, for Stafford, PLUS, and alternative loans. Service providers are looking to converge with the Common Record to take advantage of commonalities across programs and minimize the use of multiple standards.

Workgroups and Efforts Underway

Workgroups and/or Efforts	Purpose or Contribution	Deliverables
ESC XML Workgroup Co Leads: Kristi Blabaum, Educaid & Kim Shifflette, Sallie Mae	Design of a single standard XML-based Common Record to support all financial aid programs, including FFELP and Direct Lending, eliminate multiple flat files, and provide a simplified process for the submission of financial aid data by schools and their FAMS partner	Analysis of all CLR5 data elements and Documentation of required changes to the Common Record for 2003-2004
ESC Re-engineering Workgroup Co Leads: Linda King, ELM Resources & Barry Needelman, American Student Assistance	Explore additional efficiencies through possible business re-engineering for FFELP processes	Analysis of all CLR5 data elements and Documentation of required changes to the Common Record for 2004-2005
CommonLine Common Record Convergence Workgroup CCC Group Lead: Anthony Humphries, Datatel	Assist the ESC Business Re-engineering Sub Committee	Completion of a high level summary which will outline the benefits and risks of moving to a business process for FFELP that parallels the process used in COD for Direct Loans. Completion of a detailed analysis that will provide examples of the data tags needed for each transaction type.
PESC XML Forum for Education – Core Components Workgroup	Analysis and development of a combined and integrated Common Record data dictionary	Common Record data dictionary
PESC XML Forum for Education – Technology Workgroup	Development of a FFELP and alternative loan schema	FFELP and alternative loan schema