On August 19, 2005, NCHELP’s Electronic Standards Committee (ESC) submitted the Common Record: CommonLine (CRC) data exchange candidate to PESC with the objective that it become an approved and recognized education standard.

On September 1, 2005, PESC posted CRC on its website, made all corresponding announcements and communications regarding this submission, and opened a 30-day public comment period so that the education community could review and publicly comment on CRC. During the public comment period, which expired on September 30, 2005, three (3) public comments were received. Those public comments were routed to ESC and the Standards Forum for Education’s Change Control Board (CCB). Both groups reviewed the public comments, discussed each thoroughly and meticulously, and provided responses. Those comments and responses are provided below.

With both the public comment and review periods successfully completed, the CCB has recommended to the Standards Forum for Education’s Steering Committee and the PESC Board of Directors that CRC be presented for a vote by PESC Members. The PESC Board of Directors is allowed seven (7) calendar days from the date the CCB has finalized its review (which is today October 25, 2005) to ensure that all proper policies and procedures have been followed. After seven (7) calendar days (November 1, 2005), barring any issues the PESC Board of Directors may have, CRC will be presented to the PESC Members via ballots for an official vote.

Completed ballots, including the reason(s) for any rejection, are to be returned to the PESC office via e-mail attachment, fax, overnight delivery, or U.S. Postal Service within ten (10) business days. With Veteran’s Day occurring on Friday November 11, 2005, which will be recognized as a holiday, PESC Members will have from Tuesday November 1, 2005 through Wednesday November 16, 2005 6:00 PM PST to cast ballots. PESC staff is responsible for the tabulation of the ballots; acceptance of the candidate as a standard requires an affirmative vote of at least 80% of all votes cast.

Once voting has been completed, the PESC Board of Directors is allowed seven (7) calendar days to ratify the vote and accept CRC as a PESC Approved Standard (November 23, 2005).

**Public Comment 1**

**Issue:** CRC has elements that are defined in Core and other sector libraries. What will be the process to align the uses and definitions, if any with Core? Will the CRC stand alone? Or, will it be melded into the Core and have related sector libraries like the XML College Transcript and XML High School Transcript? I understand the reason for the submission and how PESC got to this point. Will PESC form a new workgroup that can focus on the implications next? For instance, address, email and other common elements are in CRC and
they do not reference the Core definitions of PESC. Some definitions overlap like PersonType and don’t include all the default elements.

**Reason:** The possible confusion of elements and naming conventions, though similar, will confuse the objective of having one common Core dictionary.

**Proposed Solution:** Suggest the change control team identify the attributes that overlap and provide some sort of analysis to the level of work to align with Core and other sector libraries.

**ESC Response:** It appears the schema referenced below is the current Common Origination and Disbursement (COD) schema. However, CRC is using the agreed upon Core Main that Admissions/Registrar is using, which is the PESC standard that will be implemented by FSA in a future version of their Common Record for COD.

Backup information from submitter:

I did not see any reference to the PESC Core XML include file (in the XSD copied below from the header of the CRC submission). I did a “Find” on PESC and Core and nothing comes up. Which, on first blush, means the CRC stands alone:

```xml
<?xml version="1.0" encoding="UTF-8" ?>
-
http://www.w3.org/2001/XMLSchema" elementFormDefault="qualified">
  <xsd:include schemaLocation="CommonRecord2.0d-VR.xsd" />
-
--
```

Above is the header of the XSD submitted as part of the CRC. Notice there is no inclusion of the Core library, which means, we may have redundant objects with no mapping to a single dictionary. Browse further down in the CRC and you will find the PersonType for example. It's definition, even though it is similar to Core, should refer to the Core dictionary object, not be defined as a new object. At least, that is my understanding of what I am reading. Other differences include Name, Birth and ContactsType. They do not point to the previous definitions in either Core or Academic. If we are going to let this go through without a scrub, we will be duplicating references. This will be a maintenance problem, when a work group requests a change to a Core object. If it is defined in more than one place, how will anyone know? I thought the intent of having one common Core Library of objects is to support reuse and avoid duplicating objects in the Sector Libraries. If we set the precedent with CRC, then don't we defeat one of our core principals of reuse?

This is the PersonType from the CRC. Notice the element type prefix is 'codv' and not 'core' like the Academic Sector library below this paste.

- <xsd:complexType name="PersonType">
  - <xsd:sequence>
    - <xsd:element name="Identifiers" minOccurs="0"/>
    - <xsd:complexType>
      - <xsd:sequence>
        - <xsd:element name="SSN" minOccurs="0"> <!-- From Academic Sector library -->
          - <xsd:complexType>
            - <xsd:simpleContent>
              <xsd:extension base="codv:SSNType" />
            </xsd:simpleContent>
          </xsd:complexType>
        </xsd:element>
      </xsd:sequence>
    </xsd:complexType>
    - <xsd:element name="DriversLicense" type="codv:DriversLicenseType" minOccurs="0"/>
  </xsd:sequence>
- <xsd:element name="BirthDate" type="xsd:date" minOccurs="0"/>
- <xsd:element name="Name" type="NameType" minOccurs="0"/>
- <xsd:element name="Contacts" type="ContactsType" minOccurs="0"/>
This is the Person Type from the Academic Sector Library. Notice the 'core:' prefix on the elements. This is a reference back to the Core dictionary.

```xml
<xs:complexType name="PersonType">
  <xs:sequence>
    <xs:element name="SchoolAssignedPersonID" type="core:SchoolAssignedPersonIDType" minOccurs="0" />
    <xs:element name="SIN" type="core:SINIDType" minOccurs="0" />
    <xs:element name="NSN" type="core:NSNIDType" minOccurs="0" />
    <xs:element name="AgencyAssignedID" type="core:AgencyAssignedIDType" minOccurs="0" />
    <xs:element name="RecipientAssignedID" type="core:RecipientAssignedIDType" minOccurs="0" />
    <xs:element name="SSN" type="core:SSNType" minOccurs="0" />
    <xs:element name="Birth" type="core:BirthType" minOccurs="0" />
    <xs:element name="Name" type="core:NameType" maxOccurs="unbounded" />
    <xs:element name="HighSchool" type="AcRec:HighSchoolType" minOccurs="0" />
  </xs:sequence>
</xs:complexType>
```

This is the secondary school (high school) from which the person graduated or the last high school the party attended.
Would the change control board not review the submission to determine the differences between a submitted candidate and our current Core objects? Would they not have to separate objects defined versus objects reused? In other Sector Libraries, Core is referenced throughout the schema. Like PersonType I mentioned above. Do we intend on scrubbing the objects for conventions and reuse? Maybe this was done at the edit stage, but the XSD files are not referencing Core. This may be OK on submission, but how do we maintain this with Core and other Sector Libraries? What if other work groups did this?

This reminds me of why COBOL programs became obsolete when they relied on duplicate include files for file definitions. Got real messy and difficult to support. That is why COBOL succumbed to newer object oriented languages. I don't want to see we create unintended consequences because we grandfather of CRC. Maybe that is an exaggeration. But, when would these files be scrubbed? Do you want more examples? When does the Change Control Board look at the submission? Before or after it is submitted for public comment?

Public Comment 2

Issue: Disbursement Rosters. One of the stated benefits of Common Record: CommonLine is: "Create change transactions by simply sending the result of the change you wish to make without having to identify the "type" of change you are making (i.e. cancellation, reallocation, reinstatement, etc.)." Several violations of this principle exist. However, the most significant is the `<DisbursementReturnedAmount>`. This should be reported in a return ROSTER document not forced into a single REQUEST/CHANGE document. NCHELP implemented the data being sent to the schools correctly. The school receives A) RESPONSE document that indicates the state of the loan. This is the current award amounts etc. The school also receives B) ROSTER document that indicates the amounts being sent in an EFT. The school should have the same counterparts for export. Namely an A) REQUEST/CHANGE document that provide the current state of the loan, and a B) return ROSTER document that indicates the amount of funds being returned.

Reason: Because Common Record: CommonLine requires the current amount of the disbursement and the net change of that disbursement, once the information gets out of sync it becomes very hard to get them back into sync. Our product can easily say that the new balance is xxxx. But without knowing what the lender has recorded on their system, our product cannot determine the amount of change.

ESC Response: ESC appreciates the comment and discussed this idea during initial requirement gathering sessions. However, it was agreed not to pursue due to a lack of business requirements for implementing this type of
process. ESC would appreciate additional information and documentation on this recommendation for consideration in a future version of CRC.

Public Comment 3

**Issue**: Combined Loans. Common Record: CommonLine allows for a Subsidized Loan and an Unsubsidized Loan to be on the same Application. The application is assigned a CommonLine Unique ID and the loans being assigned sequence numbers (usually 01, and 02). With CommonRecord the CommonLine Unique ID is renamed `<FinancialAwardID>`, and is in the `<FFELPLoanInformation>` Block (previously - Application). Within this block is the Award Block. Each Award is assigned a `<FinancialAwardNumber>`, which is usually 01, and sometimes 02. The concept of allowing two loans within a sign application was created to support single Promissory Notes, and allow for Reallocation of funds between these two loans. Over the last several years Promissory notes linked to a single application have been replaced with Master Promissory Notes that are linked to a borrower and school. And with improved financial tracking within CommonLine such as "netting" there is no need for the concept of "Reallocation" between two loans on the same application. And even if a school still wishes to use "Reallocation", CommonLine now allows for "Reallocation" to occur between two Applications.

**Reason**: Combined loans on the same application have created a much more complex situation that has no benefit.

**Proposed Solution**: I would propose that there is not a nesting of an Award Block within a Loan Block. But, that there is a single block and each block is identified with the `<FinancialAwardID>` (CommonLine Unique ID), and that the `<FinancialAwardNumber>` be removed.

**ESC Response**: ESC followed the Common Record (CR) format standard agreed upon by FSA and PESC. ESC cannot modify this format without violating this standard. Since this format is utilized by multiple PESC education related sectors, revisions must be approved by the PESC Change Control Board. Based on this, the proposed solution cannot be considered at this time.

ESC is committed to supporting the Common Record standard, and we welcome additional questions and dialogue in an effort to assist organizations implementing CRC.