



THE COHORT DEFAULT RATE Draft Challenge Process

Why is your draft Cohort Default Rate (CDR) Challenge process important? It's the only opportunity you have to dispute your Loan Record Detail Report (LRDR) data prior to your official calculation. Use these guidelines for the most accurate numbers:

- Submit your Challenge within 45 days of the begin date established by the Department of Education—typically six days after the drafts are released.
- Challenge incorrect data and/or low borrower participation.
- Use your LRDR to review specific borrower information.
- Ask: Did all borrowers enter repayment in the specified cohort year?
- Ask: Did all defaulted borrowers default during the monitoring period? (Remember the differences between FFEL and DL on claims.)
- Ask: Were there borrowers who entered repayment who were not included in the LRDR?
- Use school records and NSLDS to compare data reflected on the LRDR.
- Consider common allegations, which include, but are not limited to: incorrect repayment begin dates, incorrect default status, incorrect inclusion due to multiple loans, incorrect inclusion of a borrower, and/or incorrect exclusion of a borrower.
- Remember, a loan enters repayment six months plus one day after the borrower ceased to be enrolled at least half-time (students who graduate, withdraw, or drop below half-time status).
- Submit challenges electronically at <https://ecdrappeals.ed.gov>.
- Challenge process requires separate supporting documentation for each borrower. One certification letter covers all borrowers in question.
- Please reference the CDR Guide at www.ifap.ed.gov/DefaultManagement/finalcdrg.html for more detailed information.