STUDENT ELIGIBILITY REQUIREMENTS

This chapter describes program eligibility requirements related to the applications process for Title IV student financial aid. Treated separately in this manual are additional eligibility requirements for verification (Chapter 4), good academic standing and satisfactory progress (Chapter 5). The program eligibility issues covered in Chapter 2 include:

- Citizenship Status
- Registration with Selective Service
- Overpayment of Title IV Grants
- Default on Title IV Loans

TABLE OF CONTENTS

Overview of the Title IV Student Eligibility Requirements .......................................................... 2-3
Documentation of Citizenship or Immigration Status ................................................................. 2-5
  - Eligible Categories .............................................................................................................. 2-5
  - Ineligible Categories ......................................................................................................... 2-6
  - Citizenship Match with Social Security Administration .................................................. 2-6
    - Children Born Abroad to U.S. Citizen Parents ................................................................. 2-8
  - Lawful Permanent Residents and Other Eligible Non-citizens .......................................... 2-8
    - Match with DHS Records – Primary Verification .......................................................... 2-9
    - Automated Secondary Confirmation Match .................................................................. 2-10
    - Secondary Confirmation ............................................................................................... 2-11
    - Acceptable Documents for Paper Secondary Confirmation ......................................... 2-11
      - U.S. Permanent Resident .............................................................................................. 2-11
      - Other Classifications of Non-citizen ............................................................................ 2-12
    - Documents Showing Non-eligible Statuses .................................................................. 2-14
  - Using the SAVE System for Third Step Verification (G-845) ............................................... 2-15
    - Sample SAVE System Screen Shots ............................................................................. 2-17
    - Interpreting the DHS Response ..................................................................................... 2-20
    - Student Rights ................................................................................................................ 2-21
  - Native Americans Born in Canada ..................................................................................... 2-21
  - Citizens of the Freely Associated States .......................................................................... 2-22
  - Immigration Status Determined in Previous Award Year .................................................. 2-22
  - Change of Status within the Award Year .......................................................................... 2-23
Replacing Lost Immigration Documents ................................................................. 2-24
Financial Aid Eligibility for Non-Citizens Chart ....................................................... 2-25
Summary Chart of Acceptable Documentation .......................................................... 2-26
Sample Citizenship/Immigration Documents ............................................................. 2-27
Ineligible Immigration Status Documents ................................................................. 2-33
Common Non-Immigrant Categories and Visa Classifications ................................. 2-34

**Social Security Number Match** .............................................................................. 2-35

- Successful Match .................................................................................................... 2-35
- No Match on SSN .................................................................................................... 2-35
- No Match on Name or Birth Date .......................................................................... 2-36
- Missing Information ............................................................................................... 2-36
- Date of Death ......................................................................................................... 2-36
- Applicants Using Same SSN .................................................................................. 2-36
- When Does a Student Who Does Not Have a Valid SSN Establish Eligibility? ....... 2-37

**Selective Service Registration Compliance** ......................................................... 2-37

- Selective Service Match ........................................................................................... 2-38
- Failure to Register .................................................................................................... 2-39
- Selective Service Status Information Letters .......................................................... 2-39
- Registration Acknowledgment or Verification Postcards ......................................... 2-40
- On-line Verification of Selective Service Registration .............................................. 2-40
- When Does a Student Who Failed to Register Establish Eligibility? ....................... 2-41
- Selective Service System -- Who Must Register ...................................................... 2-41
- Summary of Selective Service Status Information Letters ....................................... 2-43

**NSLDS Financial Aid History** ............................................................................... 2-45

- NSLDS Match ......................................................................................................... 2-45
- Match Successful .................................................................................................... 2-45
- Partial Match .......................................................................................................... 2-45
- Using the Customer Care Center To Resolve Data Conflicts ..................................... 2-46
- Student Not in Database or No Relevant History .................................................... 2-46
- Processing Problem ............................................................................................... 2-47
- Changes After Initial Match – Post-Screening ........................................................ 2-47
- Checking Financial Aid History for Transfer Students ............................................ 2-47
- Data Provider Information ...................................................................................... 2-48
- Resolving Default Status ........................................................................................ 2-48
- Loan Status Codes and Eligibility Chart ................................................................. 2-48
- When Does a Student Regain Eligibility After Resolving a Defaulted Loan? .......... 2-50
- When Does a Student Regain Eligibility After Resolving an Overpayment? .......... 2-50
- Default on a Loan Made at a Closed School .......................................................... 2-52
- Effect of Bankruptcy or Disability Cancellation ....................................................... 2-52
- Regaining Title IV Eligibility After Inadvertent Overborrowing .............................. 2-54
- Unusual Enrollment History Flag ............................................................................ 2-56
- Receiving Unusual Enrollment History Flags .......................................................... 2-56
- Regaining Aid Eligibility ....................................................................................... 2-58
- CUNY Policy and Systems Support ........................................................................ 2-59
Overview of the Title IV Student Eligibility Requirements

To be considered for assistance under the Title IV federal student aid programs, a student must certify certain general eligibility requirements. The school is responsible for ensuring that a student has met all of the relevant eligibility requirements before awarding Title IV funds to that student.

A student must:
- Be a regular student enrolled or accepted for enrollment in an eligible program at an eligible institution;
- Have a high school diploma or its recognized equivalent, [e.g., a GED certificate] or complete his or her state’s requirements applicable to home schooling;
- Not be simultaneously enrolled in elementary or secondary school;
- Be a U.S. citizen or national, or an eligible noncitizen;
- Have a valid, correct Social Security Number (SSN);
- Be registered with Selective Service, if required;
- Certify, by signing a Statement of Educational Purpose, that federal student aid will be used only to pay for educational costs;
- Not be in default of a Title IV loan or owe an overpayment on a Title IV grant or Federal Perkins Loan;
- Not have received grants or loans in excess of the annual or aggregate limits;
- Not have property subject to a lien for a debt owed to the U.S.;
- Be maintaining satisfactory progress (SAP);
- Not have disqualifying drug convictions; and
- Have financial need, if applicable.

In addition, a student’s eligibility for Title IV funds may be affected by such factors as:
- Prior degrees earned;
- Enrollment status;
- Remedial course work;
- Correspondence study;
- Study by telecommunications;
- Incarceration; and
- A conviction for drug offenses.

Finally, a student who is subject to an involuntary civil commitment after completing a period of incarceration for a forcible or non-forcible sexual offense is ineligible to receive a Federal Pell Grant.
The rest of this chapter discusses eligibility issues arising from the application process [the first column of the above table]. Some of the school-based requirements from the second column such as satisfactory progress and determining financial need are discussed in later chapters of this manual (see Chapters 5 & 8). For requirements not discussed in this manual, see the FSA Handbook, Vol. I, Student Eligibility.

Certain data provided by the student on the FAFSA is compared to information stored in various federal databases. The following chart lists the federal agencies with which the matches are conducted and a general description of the match.

<table>
<thead>
<tr>
<th>Federal Agency</th>
<th>Database Match</th>
</tr>
</thead>
</table>
| Social Security Administration (SSA)                | ➢ Verifies an applicant’s (and the parents’ of a dependent applicant) SSN as valid and corresponding to the name & date of birth records at SSA  
|                                                      | ➢ Checks if the SSN belongs to a deceased person                              
|                                                      | ➢ Verifies applicant’s claim of U.S. citizenship                              |
| Department of Homeland Security (DHS) Bureau of Citizenship and Immigration Services | ➢ Verifies applicant’s eligible non-citizen status                             |
| Selective Service                                   | ➢ Verifies registration of eligible males with Selective Service              |
| National Student Loan Data System (NSLDS)           | ➢ Verifies applicant’s default and overpayment status                        
|                                                      | ➢ Ensures that aggregate and annual award limits are not exceeded            
|                                                      | ➢ Confirms that a student is eligible for Title IV funds                     |
When applicant data does not match in one or more of the federal databases, the applicant’s application record is flagged by the CPS. When an application is flagged, both the applicant and the financial aid administrator may have to take certain actions to resolve the match flag before FSA funds may be awarded and disbursed. The following pages describe how to resolve federal edits resulting from failed data matches in the following categories:

- Citizenship and Immigration Status
- Social Security Number Issues
- Selective Service Registration Compliance
- Financial Aid History – Loan Defaults and Grant Overpayments

**Documentation of Citizenship or Immigration**

**Eligible Categories**

Students must meet one of 2 classifications to receive any Title IV grant, loan or work assistance:

1. **U.S. citizen or national**
   
   Persons are U.S. citizens by birth or naturalization. A U.S. citizen is a person born in the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands, as well as most persons born abroad to parents who are citizens. All U.S. citizens are considered to be U.S. nationals, but not all nationals are U.S. citizens. Natives of American Samoa, Swain’s Island or the U.S. Minor Outlying Islands are non-citizen nationals and are eligible for federal student aid. Citizens of the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau are eligible for Federal Pell Grant, but may not receive federal educational loans.

2. **U.S. lawful permanent resident** who has an I-151, I-551, or I-551C (Alien Registration Receipt Card).

   If not a permanent resident, an eligible non-citizen must have an Arrival-Departure Record (I-94) from DHS showing one of the following designations:
   
   - “Refugee”
   - “Asylum Granted”
   - “Paroled into the United States pursuant to Section 212 of the I&N Act”
   - “Cuban-Haitian Entrant, Status Pending”
   - “Conditional Entrant” (valid only if issued before April 1, 1980).
   - Notice of Action (I-797) is USCIS’s formal communication with customers issued when an application or petition is approved or to confer an immigrant benefit.
   - Persons who have been designated as “victims of human trafficking” or “battered immigrants-qualified aliens” are new categories of eligible non-citizen.
Ineligible Categories

- Students granted relief from deportation under the Family Unity Program [“family unity status”] and students living and working in the U.S. as “temporary residents” under the Legalization or Special Agricultural Worker program are not eligible for federal student aid. (These categories became non-eligible categories with welfare reform legislation [P.L. 104-193] and immigration reform legislation [P.L. 104-208] enacted in 1996.)
- Persons who are in the U.S. on non-immigrant visas such as an F1 or F2 student visa, or a J1 or J2 exchange visitors visa, are not eligible for federal student aid unless they also have an I-94 with one of the eligible endorsements.

See this chapter for a more extended discussion of ineligible statuses.

Citizenship Match with Social Security Administration (SSA)

All applications are automatically matched with social security records to verify U.S. citizenship status. A successful match occurs when all four social security match elements (SSN, name, citizenship, and date of birth) are confirmed. There is no comment on the SAR/ISIR when the match is successful but the match flag value will either be blank or show an “A” meaning that the student’s status as a U.S. citizen was confirmed. Once confirmed, the SSA Citizenship Flag is carried forward to next year’s application and the match is not performed again.

If a student leaves the citizenship question on the FAFSA blank, CPS still attempts the citizenship match with SSA. If there is a complete match with the student’s Social Security Number, name, date of birth, and U.S. citizenship, the CPS will assume the student to be a citizen. The CPS will reject the application for insufficient information if one of the required items is not provided.

NOTE: the citizenship field on the student’s application record will remain blank even if U.S. citizenship status is confirmed. In order to make other corrections, you must also fill in this field with “U.S. citizen”.

U.S. citizens born abroad and naturalized U.S. citizens may fail the Social Security citizenship match unless they have updated their citizenship information with the Social Security Administration.

If one or more of the data items don’t match SSA records, a comment that applicant’s citizenship status could not be confirmed will appear on the SAR/ISIR. If incorrect, the student should make necessary corrections to SSN, name, or date of birth which will also cause the citizenship match to be rerun.

If the Social Security match doesn’t confirm that the student is a U.S. citizen, a comment will appear on the SAR/ISIR asking the student to provide documents proving citizenship or, if the claim of U.S. citizenship is in error, to make a correction showing that he or she is an eligible non-citizen. If the student is an eligible non-citizen, he or she must submit a correction that includes the A-number so that a DHS match might be attempted.

Students whose status was not confirmed by SSA but who are in fact citizens must provide documentation of citizenship status to the school. This documentation does not have to be submitted to any federal agency for verification but must be kept in the student’s file. The student should be advised to contact SSA to update its database, although this is not required for
the student to receive aid.

The school determines what documentation is acceptable to demonstrate U.S. citizenship; ED doesn’t specify the documentation the student must provide.

If a student must prove his status as a U.S. citizen or national, only certain types of documents are acceptable. A Social Security card or driver’s license isn’t acceptable for documenting U.S. citizenship or national status since noncitizens and non-nationals can also have these forms of identification. “Enhanced” driver’s licenses (provided by a limited number of states to permit non-air travel entry to the U.S. from Canada, Mexico, and the Caribbean) are also not acceptable. The Department doesn’t specify all of the acceptable documents.

Acceptable citizenship documentation for students born in the U.S. might include but is not restricted to:

- a copy of a birth certificate showing that he or she was born in the U.S., including Puerto Rico (on or after Jan. 13, 1941), Guam, the U.S. Virgin Islands, American Samoa, Swain’s Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats residing in the U.S.;
- a statement attesting to U.S. birth signed by a person other than a family member such as a priest, clergyman, or doctor;
- a U.S. passport book (current or expired). In the case of nationals who are not citizens, the passport will be stamped “Noncitizen National.” Note: if the passport shown is a “limited” passport, it is not acceptable documentation of U.S. citizenship. Limited passports are often issued on an emergency basis to U.S. travelers abroad who have had their passports lost or stolen and can be issued without proof that the recipient is actually a U.S. citizen.
- a U.S. passport card which is accepted at U.S. land and sea ports of entry but cannot be used for air travel.
  
  Note: a social security card, driver’s license, voter registration card or baptismal record does not document U.S. citizenship.

Acceptable citizenship documentation for persons not born in the U.S. might be:

- a Certificate of Citizenship (N–560 or N–561), issued by USCIS to persons who derive U.S. citizenship through a parent;
- a copy of Form FS-240 (Consular Report of Birth Abroad), or FS-545 (Certificate of birth issued by a foreign service post – these are State Department documents;
- a Certificate of Naturalization (N–550 or N–570), issued by USCIS through a federal or state court, or through administrative naturalization after December 1990 to those who are individually naturalized;
- a valid U.S. passport book or passport card (described above).

A Certificate of Citizenship must include the certificate number (in the upper right corner); the student’s name; and the date of issuance of the certificate. If issued to a minor child, a Certificate of Citizenship may bear the signature of the parent instead of the child, but this does not affect the legitimacy of the document. A Certificate of Naturalization must include the certificate number (in the upper right corner); the DHS Alien Registration Number; the student’s
name; the name of the court where the naturalization occurred, and the date of naturalization. DHS has advised ED that these documents may be photocopied to document eligibility for federal student aid funds. Documents that are presented to the school to confirm U.S. citizenship must be the original documents, not copies. These documents are not submitted to an outside agency like DHS for confirmation but must be kept in the student’s file.

**Documenting Citizenship**

While generally not permitted, for the purpose of applying for Title IV aid, students may legally photocopy, scan, or otherwise image immigration documents (such as Forms I-551 or I-94) to complete the G-845 secondary confirmation process. 34 CFR 668.33(c)

DCL GEN-15-08

**Children Born Aboard to U.S. Citizen Parents**

Foreign-born children of U.S. citizens are also U.S. citizens and their status is usually indicated on the SSA database when they receive a SSN. If the SSA database is not correct, such a student will fail the citizenship match. Such students should contact SSA to correct their status. These students may also document their citizenship status by a State Department-issued Form FS-240 (Consular Report of Birth Abroad).

If the birth was registered with the American Consulate/Embassy in a foreign country before the student turned 18, he/she can receive a copy of the certificate by contacting: Department of State Passport Services, Vital Records Section, 44132 Mercure Cir., PO Box 1213, Sterling, VA 20166-1213 [Tel: 202-485-8300]. The student should provide his or her name at birth, date, and place of birth, parents’ names, dates and places of parents’ birth, a daytime telephone number, and return address. The request must be signed and, for Form FS-240, the student will need to include the original form (to exchange it) or a signed affidavit that the original has been lost or destroyed.

If the student’s birth was not registered and the student is now 18 years of age or older, he or she can file a self-petition for a “Certification of Citizenship” to any local DHS office (Form N–600). Proof of the parents’ U.S. citizenship at the time of the child’s birth must be provided.

**Match for a Student Who Later Changes Names**

When a student who was naturalized as a child later changes their name, for example, due to marriage, the name on the FAFSA will usually not match the name on the certificate of naturalization/citizenship or birth certificate. If the student fails the SSA U.S. citizenship match, they may provide their certificate of naturalization or birth certificate and proof of name change (such as their marriage license) to resolve the discrepancy.

**Lawful Permanent Residents and Other Eligible Non-Citizens**

A lawful permanent resident is a non-citizen legally permitted to live and work in the U.S. permanently. Persons who are not lawful permanent residents may be eligible for federal student aid if they are in the U.S. for other than a temporary purpose and with the intention of becoming citizens or permanent residents as in the following eligible categories:
Refugees are given indefinite employment authorization. Their refugee status continues indefinitely unless revoked by DHS or until the lawful permanent residence is granted, which refugees may apply for after one year.

Persons granted asylum are given indefinite employment authorization and may apply for permanent residence after one year. Asylum status continues unless revoked by DHS or until permanent residence is granted.

Conditional entrants are refugees who entered the U.S. under the seventh preference category of P.L. 89-236 or whose status was adjusted to the lawful permanent resident under that category. Not used after March 31, 1980.

Cuban-Haitian entrants.

Persons paroled into the U.S. for at least one year must provide evidence from the DHS that they are in the U.S. for other than a temporary purpose and intend to become either a citizen or permanent resident.

Victims of human trafficking have the same eligibility for federal benefits as refugees but are certified for this status by HHS and not DHS (see p. 2-13 for more information on this category).

Battered immigrants-qualified aliens may be eligible for federal public benefits, including federal student aid, under the Violence Against Women Act (see p. 2-13 for more information on this category).

Match With DHS Records – Primary Verification

If an applicant indicates on the FAFSA that he or she is an eligible non-citizen and provides an A-number, the identifying information is sent to be matched electronically with the DHS database for “primary verification” of the student’s eligible non-citizen status. The results of the match are shown by a match flag in the FAA section of the SAR/ISIR and by a written comment about the results in the comments section.

An application answering “U.S. citizen” to the citizenship question and providing an A number will be matched with both the SSA and DHS database. If the DHS match identifies the student as an “eligible non-citizen,” the results from the DHS data match will take precedence over any results from the SSA match and the SSA citizenship match flags won’t appear on the SAR/ISIR. However, the usual procedures for resolving any DHS match discrepancies should be followed.

If a student leaves the citizenship question blank but provides an A-number, the CPS assumes the student is an eligible non-citizen and will attempt to match the A-number with DHS.

If the student leaves both the citizenship question and the A-number blank, the CPS won’t attempt a match with DHS records and will reject the application. The student must submit a correction that includes citizenship status and, if a non-citizen, an A number.

If the student indicates eligible non-citizen but leaves the A-number blank or misreports it, the match won’t be conducted. In such cases, the student receives ISIR Comment 142 and must submit a correction of the A-number so that the match can be conducted. In these situations, the FAA may not initiate paper secondary confirmation to confirm the student’s status because a DHS Verification Number will not appear on the ISIR record. The DHS will not process G-845 forms without the DHS Verification Number (see p. 2-15 of this manual for more information).

After the student or school submits the A-number as an ISIR correction, the CPS will once again attempt to conduct a match with DHS records. If the match is successful, an ISIR comment will confirm the student’s claim of eligible non-citizen status and the student may receive aid. If the...
match is conducted but the student’s status is not confirmed, the student will be required to undergo Secondary Confirmation.

**Automated DHS Secondary Confirmation**

If the database match with immigration records fails to confirm a student’s eligible non-citizen status, DHS records are automatically re-checked to see if documentation that confirms the student’s immigration status exists. If after 3 days the DHS has been unable to confirm the student’s status, the CPS will generate a SAR/ISIR with a secondary confirmation match flag of “P”, meaning that automated secondary confirmation is still in progress.

When DHS finishes the confirmation, the results are sent to the CPS which, in turn, generates another ISIR that replaces the “P” one of the following codes:

<table>
<thead>
<tr>
<th>Automated Secondary Confirmation Comment Codes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Y</td>
</tr>
<tr>
<td>C</td>
</tr>
<tr>
<td>N</td>
</tr>
<tr>
<td>X</td>
</tr>
</tbody>
</table>

**Note**: Schools should wait 5-15 business days for the results of automated secondary confirmation before initiating the paper process.

**Corrections When DHS Automated Secondary Confirmation Is Still In Progress**

It is possible that the school or the student will make corrections to a transaction while the DHS is still in the process of conducting automated secondary confirmation on that transaction. If corrections for a transaction are received before secondary confirmation has been completed on that transaction, the CPS will send the correction transaction to the DHS once again for primary verification and, if necessary, automated secondary confirmation. If the first transaction passes automated secondary confirmation, or if the corrected transaction passes either primary verification or automated secondary confirmation, the school can award and disburse aid to the student.

**Corrections When DHS Automated Secondary Confirmation Has Been Completed**

If a correction is made to a transaction after the automated secondary confirmation process has been completed and a resulting systems-generated transaction has been sent to the school, the DHS data match process will depend on the prior results. If the results of the secondary match confirm the student is an eligible non-citizen, the CPS will not send the record through the match again. Likewise, if primary verification results show a match value of “Y”, the record will not be resent. If the student did not pass either the primary verification or automated secondary confirmation on an earlier transaction, the record will be resent to DHS.
Secondary Confirmation

If the applicant fails primary verification or automated secondary confirmation, the accuracy of the student identifiers should be confirmed, especially the DHS alien registration number and DOB, before initiating secondary confirmation. If any of the student’s information is incorrect, the corrections must be submitted to the CPS before initiating secondary confirmation because the student might pass primary verification with corrected information.

If the student’s information appears correct or appears to conflict with other information in the student’s file, then secondary confirmation must be conducted to confirm the student’s status. In the secondary confirmation process, a student who is not a U.S. national or a citizen of the Freely Associated States must furnish documentation that shows an eligible non-citizen status. If the documentation provided shows reasonable evidence of eligible non-citizen status, this evidence should be submitted to DHS to confirm that the documentation is valid. If the documentation doesn’t provide reasonable evidence of a student’s eligible non-citizen status, it should not be submitted to DHS; the student is not eligible for federal student aid.

A copy of the immigration documentation the student submits, along with the secondary confirmation results received from DHS must be retained in the student’s file. The documents that are examined and photocopied for submission to DHS must be the original documents, not copies. Care must be taken that the endorsement stamp (often appearing in a rust-colored ink that is hard to copy) is legible on the photocopy.

Acceptable Documents for Secondary Confirmation

U.S. Permanent Resident
The standard document for a lawful permanent resident is either the Permanent Resident Card (Form I-551, since 1997) or the Resident Alien Card (Form I-551, before 1997), referred to as “green cards” though they are not green. DHS has been replacing the older Alien Registration Receipt Card (Form I-151) with these new cards but the Alien Registration Receipt Card remains acceptable as evidence of permanent residence for the purpose of receiving federal student aid.

Permanent residents may also present an Arrival/Departure Record (CBP Form I-94) or the new Departure Record (Form I94A) with the endorsement “Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence. Valid until _____________. Employment Authorized.” The form will have an A-number annotated on it and is an acceptable document as long as the expiration date has not passed at the time it is submitted for secondary confirmation.

The U.S. Customs Border Protection (CBP) now issues a machine-readable visa (MRIV) in the holder’s passport. The MRIV will have an admission stamp, and the statement “UPON ENDORSEMENT SERVES AS TEMPORARY I-551 EVIDENCING PERMANENT RESIDENCE FOR 1 YEAR”. An MRIV with this statement, contained in an unexpired foreign passport and endorsed with the admissions stamp constitutes a temporary I-551, valid for 1 year from the date of the endorsement on the stamp.

DHS now issues the U.S. Travel Document which replaces the Reentry Permit (Form I-327) and the Refugee Travel Document (Form I-571). It is used by lawful permanent residents (as well as refugees and asylees) and is annotated with “Permit to Reenter Form I-327 (Rev. 9-2-03).”
A student who has an approved application for permanent residence on file with DHS and is awaiting the receipt of the Permanent Resident Card may not have proof of his or her status. In the absence of a “green card” or one of the forms of I-94 listed above, a passport stamped “Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence. Valid until ___________. Employment Authorized.” would be acceptable documentation of U.S. permanent residence. However, the expiration date stamped in the passport must be valid for all semesters of the award period for which the student is receiving aid.

The Marriage Fraud Amendments established a two-year conditional permanent resident status for certain alien spouses and their children. The alien spouse of a U.S. citizen or legal immigrant is given conditional permanent residence status if the marriage took place less than two years before the spouse applied for permanent residence status or citizenship. On being granted conditional permanent resident status, aliens will be issued a Form I-551 with a 2-year expiration date (rather than the usual ten). It can be recognized because 1) the admission code on the front of the card begins with a “C” (referring to the term conditional), and 2) there is an expiration date on the back of the card. A conditional permanent resident alien must file a petition for removal of this restriction in the 90 days preceding the expiration of the two-year period of conditional status. After satisfactory review of the alien’s petition, the restriction will be dropped and new documents issued. Conditional permanent residents holding an I-551 are eligible to receive aid under the federal student aid programs until the expiration date.

If the student has an I-551 or I-151 with a baby picture, he or she should update it with DHS. Permanent residents are expected to get a new picture and be fingerprinted at age 14. An I-551 or I-151 with a baby picture may be submitted to DHS and a student ultimately paid as long as it can be confirmed that the “green card” in fact belongs to the student. This is done by comparing the card to a current photo ID that has the student’s name, date of birth, and signature. The information on the current photo ID must be consistent with any other identifying information that you keep in the student’s file.

If a person is applying to suspend deportation, he or she must request a hearing before an Immigration Law judge who will render a decision. If the decision is favorable, DHS will give the applicant a Form I-551 which will certify his or her lawful permanent resident status. Therefore, there is no special category for persons who have been granted suspensions of deportation.

**Other Classifications of Non-citizen**

The most commonly presented evidence of status will be an Arrival/Departure Record (Form I-94) stamped with one of the following:

- **Refugees** may have Form I-94 or I-94A annotated with a stamp showing admission under Section 207 of the Immigration Nationality Act (INA). They may have the old Refugee Travel Document (Form I-571) or the new U.S. Travel Document mentioned above.

- **Persons granted asylum (asylees)** will have an I-94 or I-94A with a stamp showing admission under Section 208 of the INA. They may also have some of the same travel documents mentioned above.

**NOTE:** A student in either of the above two categories who is applying for permanent residence must return his or her original I-94 to DHS. While the application is being processed, DHS will give the student a copy of the original I-94 which will include endorsement “209a (or 209b) pending. Employment Authorized.” These students are eligible for federal student aid as long as the I-94 has not expired.
Conditional entrants will have a stamp on the Form I-94 indicates the student has been admitted to the United States as a conditional entrant. Although this status remains valid, DHS stopped admitting individuals into the U.S. in this status after March 31, 1980. If a student presents an I-94 with a conditional entrant status granted after March 30, 1980, you shouldn’t disburse funds.

Paroled persons (parolees) must have a stamp indicating that the student has been paroled into the United States for at least one year with a date that has not expired. (Federal student aid may not be disbursed after the document has expired.)

Cuban-Haitian entrants will have a Form I-94 with the following stamp: “Cuban-Haitian Entrant (Status Pending). Reviewable January 15, 1981. Employment Authorized until January 15, 1981.” These documents are valid no matter what expiration date appears.

Victims of human trafficking are entitled to the same federal benefits as refugees under Section 107(b)(1)(A) of the Victims of Trafficking and Violence Protection Act (VTVPA). However, U.S. Department of Health and Human Services (HHS) has responsibility for certifying an individual as a victim of human trafficking and not DHS. HHS issues a Certification Letter to a victim age 18 or older and an Eligibility Letter to a victim under the age of 18. Certain relatives of a victim in possession of a valid T-visa as explained below may also be eligible.

When these applicants file a FAFSA, they will fail the DHS data match because DHS does not have the eligibility status of victims of human trafficking from HHS in its systems. Therefore, before Title IV program assistance can be disbursed, the FAA at the school must confirm the applicant's status under the VTVPA.

The applicant must present to the FAA a copy of the Certification Letter or Eligibility Letter that was issued by HHS. The FAA must call the HHS Office of Refugee Resettlement at 1-866-401-5510, as noted in the letter, to verify its validity and to confirm that HHS certification or eligibility has not expired. The FAA must document the time and date of the call to the HHS Office of Refugee Resettlement, as well as record the results of the call and retain a copy of the Certification Letter or Eligibility Letter for the school records. Once the student’s status is confirmed by this process, an otherwise eligible applicant may receive Title IV program assistance for the award year. If the student applies for Title IV program assistance at the same institution in a subsequent year, the FAA must re-verify that the student's Certification Letter or Eligibility Letter remains in force by again calling the HHS Office of Refugee Resettlement.

The spouse, child, or parent of a victim of human trafficking may also be eligible for Title IV program assistance. These individuals will not have an HHS provided Certification Letter or Eligibility Letter but will have a T-visa (T-2, T-3, or T-4, etc.). Such applicants will also fail the DHS data match. The FAA must follow the procedure outlined above to verify the validity of the T-visa and Certification Letter.

See Dear Colleague Letter GEN-06-09 (May 2006) for more information and sample certification and eligibility letters [https://www.ifap.ed.gov/dpcletters/GEN0609.html].

Battered immigrants-qualified aliens are immigrants who are victims of domestic violence by their U.S. citizen or permanent resident spouses and who may, with their designated children, be eligible under the Violence Against Women Act (VAWA) for federal public benefits, including federal student aid. These students will fail the “eligible non-citizen” match because information on these immigrants are not maintained
in the DHS system used to make the data match, so a separate procedure has been established to establish eligibility for these students.

The student will need to provide documentation of their status to the FAA and the specific documentation required is based on their case type: self-petition, suspension of deportation, or cancellation of removal.

In self-petitioning cases, the immigrant applies to the USCIS who may approve or deny the petition or indicate a “prima facie” case has been established. With an approval of a petition, the USCIS will issue a Form I-797, Notice of Action Form that will indicate that it is an approval notice. Separate approval notices would be issued to any dependent children listed on the original petition. The approval notice documents an eligible citizenship status for federal student aid for those persons listed on the notice(s).

A Form I-797 can be issued by USCIS indicating the establishment of a “prima facie” case which will exist usually for a period of up to 180 days (with possible extensions) until USCIS ultimately approves or denies the petition. Separate notices would be issued to any dependent children listed on the original petition. As long as the deadline has not passed, this notice documents an eligible citizenship status for federal student aid for those persons listed on the notice(s).

An immigration judge may issue either a “suspension of deportation” or a “cancellation of removal” of the abused person under VAWA. A copy of the court order documents the citizenship eligible status for federal student aid for the persons listed on the document as long as the order has not expired.

The FAA must examine the USCIS or court documents and retain a copy in the student’s files. The original document can serve in subsequent award years as long as it has not expired as long as the student also submits a dated, written statement that his or her immigration status under VAWA remains in effect without change. If the documentation has expired, it must be renewed.

The student’s eligibility for aid will be based on the result of the submission. For more information, see DCL GEN-10-07.

Documents Showing Non-Eligible Statuses

If a document a student provides is for a non-eligible status, it should not be submitted to DHS for secondary confirmation. DHS only confirms whether or not the document is genuine, not if the student is eligible for federal student aid. Unless a student can submit documentation for an eligible status, the student cannot receive aid.

An approved Form I-817, “Application for Family Unity Benefits,” indicates that a student has been granted relief from deportation under the Family Unity Program. These students are not eligible for federal student aid.

The Immigration Reform and Control Act of 1986 (IRCA) established a legalization program (also called the amnesty program) for certain undocumented aliens. Though allowed to work while their application or permanent residence was being processed, they are not eligible for federal student aid. Students in this category might present several kinds of documents to document their status: the Employment Authorization Card (Form I-688A), Employment Authorization Documents (Form I-688B or Form I-766) or the Temporary Resident Card (Form I-688). None of these documents qualifies the student for federal aid.
Note: Employment authorization does not, in and of itself, constitute proof of eligible non-citizen status. Documentation showing only employment authorization is inconclusive; the student needs to produce some form of acceptable documentation to prove eligible non-citizen status.

Students with non-immigrant visas are not eligible for federal student aid funds unless they also have an I-94 with one of the eligible endorsements listed earlier. Non-immigrant visas include the F-1, F-2 or M-1 Student Visa, B-1 or B-2 Visitor Visa, J-1 or J-2 Exchange Visitors Visa, H series or L series Visa (which allow temporary employment in the U.S.), or a G series Visa (pertaining to international organizations).

Students who have a “Notice of Approval to Apply for Permanent Residence (I-171 or I-464)” (and who had not been in a previously eligible category) cannot receive federal student aid. Therefore, a holder of an I-94 with one of the following endorsements is not eligible for federal aid: “adjustment applicant,” “245,” “245 applicants,” or “applicant for permanent residence.”

Some students are issued a Form I-94 stamped “Temporary Protected Status.” This is a status used for persons who are from countries in upheaval but is a temporary status in that it does not provide for eventual conversion to permanent resident status. These students are not eligible for federal student aid.

Deferred Action for Childhood Arrivals (DACA) provides for a two-year grant of deferred action to certain individuals who are not in lawful immigration status and entered the United States as minors. Sometimes confused with the proposed, but not as yet enacted DREAM Act provisions, DACA does not confer lawful immigration status upon recipients, nor does it provide a pathway to citizenship. DACA recipients are eligible for work authorization and to apply for social security numbers, but are not eligible for federal or state financial aid assistance.

Using the Systemic Alien Verification for Entitlements Program (SAVE) for Third Step Verification (formerly G-845)

In an effort to expedite the processing of secondary verification confirmation, the U.S. Customs and Immigration Service (USCIS) has introduced a new web based platform called SAVE. This platform will allow FAAs to upload documentation required for this process. SAVE will be used for the processing of third party verification for determining students’ eligibility for Title IV aid. The website can be accessed at: https://save.uscis.gov/web/vislogin.aspx?JS=YES

Note: As of May 2018 FAAs must use USCIS/SAVE to submit the Third Step Verification (former G-845) electronically. The G-845 will no longer be accepted in paper forms nor return paper responses. More information available about USCIS/SAVE in IFAP Information Pages.

To initiate Third Step Verification Confirmation, the FAA must complete a SAVE “Document Verification Request.” Online. This is a new standard procedure that is used to ask the DHS File Control Office to confirm that an alien’s documentation is valid.

To complete the DHS Third Confirmation, you will need student’s date of birth and “Case Verification Number” (the 15 digit number that is printed in the “FAA Information” section with the match flags in Part 1 of the SAR) is correctly copied. This number can also be found on the ISIR database match page. Confirmation requests without this number cannot be processed.

On the USCIS/SAVE website, you will be allowed to:
1. Upload documents
2. Review the DHS Confirmation and name of the student
3. Edit the information of the institution

Attach a photocopy of the front and back sides of the student’s immigration document(s) and upload this information to the USCIS/SAVE page no later than 10 business days after receiving this documentation from the student. The photocopy must be legible and cannot exceed 5 MB. Resolution for your scan between 400 and 600 DPI recommended. It is also recommended to use a color copy or scan. A response from DHS should be available within 3-5 days of submission.

Best Practices when a Case is closed

A case verification number from a FAFSA transaction that was completed 120 days prior to the date of submission to SAVE will trigger a closed case on the SAVE Data Base.

Identify a closed case before completing the G-845 Form

Before completing a G-845 form, check the date of the first (01) transaction and, if applicable, the date a transaction on which a correction was made to the student’s name, date of birth or Alien Registration Number (ARN). Corrections made to one or more of these three specific fields should cause the FAFSA to be resubmitted through the DHS match resulting in the issuance of a new DHS Verification Number on the resulting Institutional Student Information Record (ISIR). If the latter of these dates was more than nine months ago, follow the instructions below to generate a new ISIR:

Resolve this issue via a correction record

To resolve this issue, the financial aid administrator must: Return the record to DHS to request a new DHS Verification Number. Log in to FAA Access to CPS Online, click on the applicant’s most recent transaction, open corrections, and re-enter the student’s name (by typing over the same letters). Submit this update as a correction record to the Central Processing System. In three business days, the institution will receive a new ISIR. Check the DHS Match Flags to determine if the applicant’s status has been updated to “Eligible Noncitizen.”

When confirmation results in an eligible status, the G-845 must be retained in the student’s file. If the confirmation process results in a discrepancy with DHS, no aid can be disbursed or loans originated until the discrepancy is resolved. If the discrepancy cannot be resolved, and aid was disbursed, it must be repaid (except for any FWS wages earned). If the student is able to provide new information, it must be submitted to DHS on a new G-845.

As long as these procedures have been followed, including notifying the student by mail of the discrepancy and withholding further disbursements and loan certifications, the institution is not liable for any aid disbursed prior to secondary confirmation assuming there was no other conflicting information prior to the disbursement and available documentation had been found acceptable as proof of the student’s eligible non-citizen status.
Below are sample screenshots of the SAVE system.

Sign In Screen

![Sign In Screen](image)

Case Search Screen

![Case Search Screen](image)
Review and Upload Documents Screen

Case Under Review Screen
Interpreting the SAVE Response

The following table shows students’ eligibility status.

<table>
<thead>
<tr>
<th>USCIS Response SAVE</th>
<th>Eligibility Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lawful Permanent Resident</td>
<td>Eligible for FSA funds</td>
</tr>
<tr>
<td>Conditional Resident</td>
<td>Eligible for FSA funds</td>
</tr>
<tr>
<td>An alien who is employment authorized in the United States</td>
<td>Eligibility status inconclusive. The student must also have another eligible status checked on the form or provide other documentation that can be confirmed by USCIS.</td>
</tr>
<tr>
<td>Alien not authorized employment in the United States</td>
<td>Not eligible for FSA funds</td>
</tr>
<tr>
<td>An alien who has an application pending for…</td>
<td>Eligibility status inconclusive. The student must also have another eligible status checked on the form or provide other documentation that can be confirmed by USCIS.</td>
</tr>
<tr>
<td>Alien granted asylum or refugee status in the United States</td>
<td>Eligible for FSA funds</td>
</tr>
<tr>
<td>Alien paroled into the United States</td>
<td>Eligible for FSA funds if paroled into the U.S. for one year or more and there’s DHS evidence that he is in the U.S. for other than a temporary purpose and intends to become a citizen or permanent resident.</td>
</tr>
<tr>
<td>Cuban/Haitian entrant</td>
<td>Eligible for FSA funds</td>
</tr>
<tr>
<td>An alien who is a conditional entrant</td>
<td>Eligible for FSA funds</td>
</tr>
<tr>
<td>An alien who is a nonimmigrant</td>
<td>Not eligible for FSA funds</td>
</tr>
<tr>
<td>American Indian born in Canada</td>
<td>Likely eligible for FSA funds if adequate Jay Treaty documentation provided</td>
</tr>
<tr>
<td>U.S. citizen</td>
<td>Eligible for FSA funds. Note: SAVE should not be used to verify U.S. citizenship</td>
</tr>
<tr>
<td>Resubmit request with both sides of the applicant’s immigration document.</td>
<td>Resubmit the student’s immigration documents with copies of both sides of each document.</td>
</tr>
<tr>
<td>Unable to verify status on the document provided.</td>
<td>Not eligible for FSA funds. If this is checked, DHS-uscis was not able to verify the student’s status based on the documentation provided. The student must contact the appropriate agency, i.e., USCIS, Immigration and Customs Enforcement (ICE), or Customs and Border Protection (CBP) to correct their records.</td>
</tr>
<tr>
<td>Applicant’s Immigration document is illegible</td>
<td>Resubmit the student’s immigration documents with higher quality copies of the original documentation.</td>
</tr>
</tbody>
</table>
Student Rights

The student who doesn’t pass the DHS data match must be notified at the time the results are received by the school and given at least 30 days to provide documentation of immigration status. This 30 day period may extend past the end of the award year or period of enrollment. During this period and until the secondary confirmation results are received, students may not have their aid denied, reduced, or terminated. Disbursements can be made to an otherwise eligible student pending a DHS response if at least 15 working days have passed since the date any documentation was submitted to DHS.

If a student was erroneously determined to be an eligible non-citizen, the school would not be held liable if it possessed no other conflicting data and relied on one of the following for the determination:

- an output document indicating the student meets the requirements for federal aid;
- DHS determination of an eligible immigration status in response to a request for secondary confirmation;
- immigration status documents submitted by the student, if DHS did not respond in a timely fashion.

The student (or parent for PLUS borrowers) would be liable to repay any federal student aid received if he or she is ineligible. On the other hand, the school would be liable if it awarded and disbursed aid without one of the above types of evidence. In any determination of ineligibility, the student must be notified and given the opportunity to appeal and submit additional documentation in support of eligible non-citizen status.

Every student required to undergo secondary confirmation must be furnished the following in writing:

- an explanation of the documentation the student must submit as evidence of eligible non-citizen status such as the Summary Chart of Acceptable Documentation on p. 2-26;
- the school’s deadlines for submitting documentation (must be at least 30 days after the results of primary verification/automated secondary confirmation have been received);
- notification that if the student misses the deadline, he or she may not receive federal student aid funds for the award period (or period of enrollment); and
- acknowledgment that a final decision will not be made about the student’s eligibility until the student has a chance to submit immigration status documents.

Native Americans Born in Canada

Individuals born in Canada with at least 50% Native American blood have certain unique rights under the Jay Treaty of 1794, subsequent treaties, and U.S. Immigration Law. The Jay Treaty provides that persons born in Canada with at least 50% Native American blood have the legal right to enter freely into the United States. They are automatically deemed “lawfully admitted for permanent residence” and, thus, eligible for federal student aid.

Because there are very few federal aid applicants eligible under the Jay Treaty, the citizenship question on the FAFSA does not have a separate response for such students. A Native American who is eligible for federal student aid because of the Jay Treaty should report on the FAFSA that he or she is an “eligible non-citizen” and should fill in the Alien Registration Number with “A999999999.” When the application is matched by the central processor (CPS) with DHS, this response will not be confirmed. It is then the responsibility of the financial aid administrator to...
obtain proof that the student has 50% Native American blood and was born in Canada.

The following is acceptable documentation of the applicability of Jay Treaty status:

- A “band card” issued by the Band Council of a Canadian Reserve, or by the Department of Indian Affairs in Ottawa;
- A birth or baptismal record;
- An affidavit from a tribal official or another person knowledgeable about the applicant’s or recipient’s family history;
- Identification from a recognized Native American provincial or territorial organization.

If a Canadian-born Native American with at least 50% Native American blood can provide one of the above forms of documentation, and meets other Title IV eligibility criteria, the institution, after documenting the student’s file, may award the student federal student aid.

**Citizens of the Freely Associated States**

Students who are citizens of the Marshall Islands, the Federated States of Micronesia and the Republic of Palau are eligible for Federal Pell Grants but are not eligible for any federal loans. These students should answer “eligible non-citizen” on the FAFSA but leave the A-number item blank. (If they do not have a Social Security number, they are provided a 9 digit pseudo social security number assigned by CPS unless the student never filed a FAFSA before, this is to account for the LEU.) They should take care to provide the correct state abbreviation for the “State of legal residence” item on the FAFSA. Because the student isn’t providing the A-number, the application will not go through the DHS match. As long as the student’s file contains consistent information about his or her citizenship, citizenship documentation does not need to be collected.

**Immigration Status Determined in Previous Award Year**

Unless the school has conflicting information or reason to believe that a student’s claim of citizenship status is incorrect, it may not require the student to produce DHS documentation required of permanent residents or the other categories of eligible non-citizen if the student demonstrated in a previous award that he or she is:

- a born or naturalized U.S. citizen;
- a U.S. non-citizen national (a native of American Samoa or Swain’s Island); or
- a permanent resident of the Freely Associated States (e.g. Trust Territory of the Pacific Islands or the Marshall Islands, the Federated States of Micronesia and Palau) or the Northern Mariana Islands.

A school may not request secondary confirmation if the student demonstrated eligibility through secondary confirmation in the previous award year, provided that:

- the DHS documents used for secondary confirmation have not expired; and
- the institution has no conflicting information about that student’s status.

A school is not prohibited from requesting secondary confirmation for any student who changes a response on an application from “not eligible” or “eligible non-citizen” to “U.S. citizen.” If the school has conflicting documentation, a reason to believe the claim of U.S. citizenship is incorrect or believes the submitted documentation is fraudulent, it may also request secondary confirmation. To invoke the secondary confirmation exclusion, the school must have actually
confirmed the student’s status using secondary confirmation. If DHS did not respond to the request in the previous year, the exclusion has not been met. If the following categories are flagged with the citizenship edit, they must undergo secondary confirmation each year:

- **Temporary Form I-551.** Students presenting this form in a prior year should have received the permanent I-551 by the next year and should obtain from DHS either a permanent I-551 or an updated endorsement on the temporary card.
- **Refugee.** The student may have been adjusted to permanent resident status or may have had his or her status revoked.
- **Person Granted Asylum.** The student may have been adjusted to permanent resident status or may have had his or her status revoked.
- **Cuban-Haitian Entrant.** The student may have been adjusted to permanent resident status or may have had his or her status revoked.
- **Person Paroled.** The student may have been adjusted to permanent resident status or may have had his or her status revoked.
- **Conditional Entrant.** This individual is still eligible as long as he or she holds a departure record showing admission into this status through March 31, 1980. However, you should refer the student to DHS. DHS is working on adjusting the status of this category of persons to permanent resident status. If DHS continues to designate the student to be a conditional entrant, you should note in the student’s file that the student’s conditional entrant status was confirmed.
- **Victims of Human Trafficking.** The school must contact HHS each year to confirm that student’s status is still valid.

**Change of Status Within Award Year**

If a student becomes a citizen or eligible noncitizen at any time during the award year, the student may be paid Pell Grant or campus-based funds as if he or she had been eligible the entire award year. For example, if a student attending school during the 2018-19 award year (July 1, 2018, to June 30, 2019) is granted permanent-resident status in May 2019 and is still enrolled in school at that time, that student may receive Pell Grant and campus-based funds for every term they attended that the school considers part of the 2018-19 award year.

Similarly, if a Direct Loan borrower becomes a U.S. citizen or an eligible noncitizen during a period of enrollment, his or her loan limit is equal to the limit that he or she would have been allowed had he or she been a U.S. citizen or an eligible noncitizen from the beginning of the enrollment period.

In some cases, the expiration date on a student’s DHS documentation passes during the award year. Provided the date on the documentation is valid when the school first determines the student’s status for that award year, the student does not need to submit new proof. However, if flagged for the next award year, the student would need to provide valid documentation.

A school is required to check a student's citizenship status only once during the award year. If a student loses citizenship or eligible non-citizenship status during an award year or during a period of enrollment, the school does not need to take any action to prevent the student from receiving aid.
Replacing Lost DHS Documents

If a student cannot locate his or her official DHS documentation, he or she must request that they are replaced. Non-citizens who are 18 years and older must have immigration documentation in their possession at all times while in the U.S. Requests for replacement documents should be made to the DHS District Office that issued the originals.

The student will be asked to complete a Form I-90, “Application to Replace Alien Registration Card” or a Form I-102, “Application for Replacement/Initial Nonimmigrant Arrival-Departure Document.” PDF versions of these forms can be downloaded from the DHS website at http://uscis.gov/. A temporary I-94 might be issued while the replacement documents are pending.

In cases of undue hardship, where the student urgently needs documentation of his or her status, the Freedom of Information Act (FOIA) allows the student to obtain photocopies of the original documents from the DHS District Office that originally issued them. The student can submit Form G-639 to make this request or simply send a letter to the district office.

If unsure which district office issued the original documents, the student may send their request to the FOIA office at:

   National Record Center (NRC)
   FOIA/PA Office
   P.O. Box 648010
# Financial Aid Eligibility for Non Citizens Chart

<table>
<thead>
<tr>
<th>Student Status</th>
<th>Federal Title IV Aid Programs</th>
<th>NYS Aid Programs</th>
<th>Special Program Funding</th>
<th>N/E - Not Eligible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent U.S. Resident Form I-151, I-551, or I-551C</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Asylum Status Granted</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Refugee/Parolee Status Granted</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Victims of Human Trafficking (and their spouses and children)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Battered Immigrants</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Deferred Action for Childhood Arrivals</td>
<td>N/E</td>
<td>N/E</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Permanent Residency Pending</td>
<td>N/E</td>
<td>N/E</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Asylum Pending</td>
<td>N/E</td>
<td>N/E</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Refugee/Parolee Pending</td>
<td>N/E</td>
<td>N/E</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Conditional Entrant* Temporary Refugee Status</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Cuban/Haitian Entrant</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>I-688 Holders I-688A Holders I-688B</td>
<td>N/E</td>
<td>N/E</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>I-766 Holders</td>
<td>N/E</td>
<td>N/E</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Undocumented Alien</td>
<td>N/E</td>
<td>N/E</td>
<td>N/E</td>
<td></td>
</tr>
</tbody>
</table>

N/E - Not Eligible

* Dated prior to March 31, 1980 (See FSA Handbook Volume 1, Chapter 2, Student Eligibility 2018-19, Page 1-38

Note:  
1. New York State residency is required for all NY State programs and SEEK  
2. New York City residency is required for College Discovery and Bi-Lingual program.
**Summary Chart of Acceptable Documentation**

As an alternative for a student who is having trouble obtaining replacement DHS documents, the student may use a G-639 to request photocopies of the original documentation.

<table>
<thead>
<tr>
<th>Citizen Not Born in the United States</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Certificate of Citizenship</td>
<td>Must have student’s name, certificate number and the date the certificate was issued</td>
</tr>
<tr>
<td>Certificate of Naturalization</td>
<td>Must have student’s name, certificate number, Alien Registration Number, name of the court (and date) where naturalization occurred</td>
</tr>
<tr>
<td>“Certification of Birth Abroad” Form FS-545, or FS-240, “Report of Birth Abroad”</td>
<td>Must have embossed seal “United States of America” and “State Department”</td>
</tr>
<tr>
<td>U.S. Passport book or card</td>
<td>Current or expired OK; limited passport not OK</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Non-Citizen National</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Passport book or card</td>
<td>Must be stamped “Noncitizen National”</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permanent Resident</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>“Permanent Resident Card” Form I-551, or the “Alien Registration Receipt Card” Form I-151</td>
<td>OK if not expired at the time of confirmation</td>
</tr>
</tbody>
</table>
| Unexpired Foreign Passport | Must be stamped “Processed for I-551” with expiration date  
May have Machine Readable Immigrant Visa (MRIV) with admission stamp and following statement “Upon endorsement serves as temporary I-551 evidencing permanent residence for 1 year” |
| “Arrival-Departure Record” Form I-94 | Must be stamped “Processed for I-551” with expiration date, or “Temporary Form I-551,” with appropriate information filled in |
| U.S. Travel Document | Must be annotated with “Permit to Reenter Form I-327 (Rev. 9-2-03).” |

<table>
<thead>
<tr>
<th>Other Eligible Non-Citizen</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>“Arrival-Departure Record” Form I-94</td>
<td>Must be stamped Refugee, Asylum Status, Conditional Entrant (before April 1, 1980), Parolee, Cuban-Haitian Entrant</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Victims of Human Trafficking</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>HHS Certification or Eligibility Letter or T-Visa (if spouse or child of HTV)</td>
<td>Status must be verified each year by confirmation phone call to HHS</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Battered immigrants-qualified aliens</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Form I-797 Notice of Action approval or prima facie letter or immigration judge’s court order</td>
<td></td>
</tr>
</tbody>
</table>
CITIZEN NOT BORN IN U.S./NONCITIZEN NATIONAL

**U.S. Passport**
Can be used to document citizenship for citizen born abroad.

For a noncitizen national, must be stamped “Noncitizen National.”
(Note that a passport issued by another country may be used to document permanent resident status if it has the endorsement “Processed for I-551” and has a currently valid expiration date.)

**U.S. Passport Card**
This resembles a credit card in size and form. Though it cannot be used for international air travel, it is, like the passport book, proof of U.S. citizenship.

**Certificate of Citizenship**
The Certificate of Citizenship is issued to persons who were born abroad of U.S. parent(s), who became citizens when their parents were naturalized, or who were adopted by U.S. parents.
Certificate of Naturalization
The Certificate of Naturalization is issued to naturalized U.S. citizens.

A revised version of the Certificate of Naturalization (Form N-550) was created in 2010.

All previously issued certificates remain valid.

Certification of Birth Abroad
Issued to U.S. citizens born abroad. Must have embossed seal of the State Department.
CITIZEN NOT BORN IN U.S./NONCITIZEN NATIONAL
PERMANENT RESIDENT/OTHER ELIGIBLE NONCITIZEN

Form CBP I-94
Here is a sample paper form. Although such are no longer normally issued for air and sea arrivals, legacy paper forms are still valid and in use, and one may still encounter recently issued valid paper forms.

Form CBP I-94A
Below, the computer-generated Form CBP I-94A replaces the paper Form I-94 that was completed manually. For eligible noncitizens, it must be annotated as described earlier in this chapter.

See also the I-94 website at: www.cbp.gov/I-94. The website allows you to look up I-94 student data, if the student grants you permission to do so.
I-94 Arrival-Departure Record
For permanent resident status, must be stamped “Processed for I-551” with expiration date or “Temporary Form I-551” with appropriate information filled in. For other eligible noncitizens, must be stamped as Refugee, Asylum Status, Conditional Entrant (before April 1, 1980), Parolee, or Cuban-Haitian Entrant.

United States Travel Document
(front cover)
This contains the Reentry Permit (Form I-327) and the Refugee Travel Document (Form I-571). It is used by lawful permanent residents, refugees, and asylees and will be annotated as described earlier in the chapter.

Re-entry permit
USCIS issues the Form I-327, Re-Entry Permit to permanent residents and conditional residents to allow them to re-enter the United States for a period of two years. The re-entry permit is found in the U.S. Travel Document.
PERMANENT RESIDENTS

Permanent residents are issued identification cards that they are required to have in their possession at all times. The first Alien Registration Receipt Card was introduced in 1946 and through various revisions was primarily green, which caused it to be known as a "green card." This term is still used, though the cards have changed color over the years.

Alien Registration Receipt Card I-151
(front and back)
Issued prior to June 1978 to permanent residents.
Note: As of March 20, 1996, Form I-151 is no longer acceptable to USCIS as evidence of permanent residence, though it may be used to receive FSA funds.

Resident Alien Card
I-551 (two versions, front only)
The I-551 is a revised version of the I-151. It was phased in beginning in January 1977 and was revised in 1989. The "Conditional Resident Alien Card" is identified by a "C" on the front and an expiration date on the back.

Permanent Resident Card I-551 (front only for older versions, front and back for the current version)
The Permanent Resident Card was introduced in December 1997 and revised in 2004. In 2010 it was again updated, with the color green used once more in the design of the front of the card.
CBP I-94 Website Printout
Travelers have access to their electronic I-94 via www.cbp.gov/I94. The website printout serves the same purpose as any other I-94. A sample of what the printout looks like is shown here.

Machine Readable Immigrant Visa (MRIV)
The MRIV will appear in the holder's (foreign) passport. If the passport is unexpired and endorsed with an admission stamp and the statement, “Upon endorsement serves as temporary I-551 evidencing permanent residence for 1 year,” it serves as a temporary I-551 and as valid documentation for establishing aid eligibility.
Ineligible Immigration Status Documents

The following documents do not establish or support a student’s claim to be an eligible noncitizen for federal student aid purposes.

<table>
<thead>
<tr>
<th>Document</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temporary Resident Card (Form I-688)</td>
<td>The Immigration Reform and Control Act of 1986 (IRCA) established a legalization program (also known as the amnesty program) for certain illegal aliens. Eligible amnesty applicants were issued an I-688 and were allowed to work in the U.S. while their permanent resident application was being processed.</td>
</tr>
<tr>
<td>Employment Authorization Card (I-688A)</td>
<td>Allows a student to work in the U.S. while his or her permanent resident application is being processed. Employment authorization does not, in and of itself, constitute proof of a student’s eligible noncitizen status.</td>
</tr>
<tr>
<td>Employment Authorization Documents (I-688B or I-766)</td>
<td>Allows a student to work in the U.S. while his or her permanent resident application is being processed. Employment authorization does not, in and of itself, constitute proof of a student’s eligible noncitizen status.</td>
</tr>
<tr>
<td>Form I-171 or I-464, Notice of Approval to apply for Permanent Residence</td>
<td>Indicates that the student is eligible to apply for permanent resident status. Application for permanent resident status does not constitute proof of a student’s non-eligible status.</td>
</tr>
<tr>
<td>Form I-181, I-18111A or I-181B</td>
<td>Indicates that the applicant has applied for permanent resident status, but does not prove that permanent resident status has been granted.</td>
</tr>
<tr>
<td>Form I-817, Application for Family Unity Benefits</td>
<td>Indicates that the student was granted status and relief from deportation under the Family Unity Program. However, status under the Family Unity Program no longer qualifies as an eligible noncitizen status.</td>
</tr>
</tbody>
</table>
## Common Non-Immigrant Categories and Visa Classifications

A student holding a visa with any of the following visa categories or classifications is a non-immigrant and not eligible for federal student aid.

<table>
<thead>
<tr>
<th>Visa Category or Classification</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Diplomatic and other foreign government officials, and their families and employees</td>
</tr>
<tr>
<td>B-1</td>
<td>Temporary visitors for business</td>
</tr>
<tr>
<td>B-2</td>
<td>Tourist</td>
</tr>
<tr>
<td>C</td>
<td>Aliens in transit</td>
</tr>
<tr>
<td>D</td>
<td>Crewmen</td>
</tr>
<tr>
<td>E</td>
<td>International traders and investors</td>
</tr>
<tr>
<td>F-1</td>
<td>Students pursuing full-time academic studies or language training programs at colleges, universities, seminaries, conservatories, academic high schools, and other academic institutions</td>
</tr>
<tr>
<td>F-2</td>
<td>Spouses and children of aliens with F-1s</td>
</tr>
<tr>
<td>G</td>
<td>Representatives of international organizations and their families and employees</td>
</tr>
<tr>
<td>H, L, and O</td>
<td>Temporary workers and their spouses and children</td>
</tr>
<tr>
<td>J-1</td>
<td>Aliens in educational and cultural exchange programs</td>
</tr>
<tr>
<td>J-2</td>
<td>Spouse and children of aliens with J-1s</td>
</tr>
<tr>
<td>J, H-1B</td>
<td>Physician, professor, scholar, teacher</td>
</tr>
<tr>
<td>K</td>
<td>Alien fiancées, spouses, and children of U.S. citizens</td>
</tr>
<tr>
<td>M-1</td>
<td>Students enrolled in vocational or other non-academic programs, other than language training</td>
</tr>
<tr>
<td>M-2</td>
<td>Spouses and children of aliens with M-1s</td>
</tr>
<tr>
<td>P</td>
<td>Performing athletes, artists, entertainers</td>
</tr>
<tr>
<td>Q</td>
<td>Aliens in international exchange programs and their families</td>
</tr>
<tr>
<td>R</td>
<td>Religious workers</td>
</tr>
<tr>
<td>TPS</td>
<td>Aliens with temporary protected status</td>
</tr>
<tr>
<td>U</td>
<td>Crime victims cooperating with federal investigations</td>
</tr>
<tr>
<td>V</td>
<td>Alien spouses and children of U.S. permanent residents</td>
</tr>
</tbody>
</table>
Social Security Number Match

To receive FSA funds, a student must have a valid Social Security number. The CPS conducts a match with SSA records to determine that a student’s SSN is valid and that the name and date of birth associated with that number corresponding to the information provided on the FAFSA. The Department also uses this match to confirm whether or not the student is a U.S. citizen [see the previous section]. Except for citizens of the Freely Associated States, the CPS won’t process an application without a valid SSN.

The results of the match with SSA records appear on the SAR/ISIR in the “FAA Information” section as the SSN Match Flag. If the match is unsuccessful, a comment will appear on the SAR/ISIR giving the student instructions on how to resolve the problem.

If the match is successful, there is no printed comment to the student and the CPS will not rematch the student’s data with the SSA database on subsequent transactions unless the student makes corrections to name, birth date or SSN. Once the match elements have been confirmed, the SSN flag for a successful match will be carried forward to next year’s Renewal FAFSA and the match will not have to be performed again.

Successful Match

If the match with the SSA database confirms the student’s SSN, name and date of birth on the FAFSA matches SSA records, the student may receive FSA payments. Once this information is confirmed, the student may not change the SSN on his or her aid record. If a student tries to change a previously confirmed SSN, the CPS won’t accept the change and will refer the student to the FAA for help. In the unlikely event that the confirmed SSN is wrong, the student must correct it by filing a new FAFSA.

No Match on the Social Security Number

If the SSN the student reported is not found in the SSA database, the student’s application will be rejected and the student will receive a comment to correct the SSN or to contact SSA if he or she believes the SSN to be correct.

If the student reports the wrong SSN on the original FAFSA, there are two ways to correct it. The student may file a completely new FAFSA with the corrected SSN. The student may also correct the SSN by changing the original application information. When a student record is first created, the SSN and the first 2 letters of the applicant’s last name comprise the CPS record identifier for the processing year. When an SSN correction is submitted, the CPS updates the current SSN but leaves the record identifier unchanged.

The Common Origination and Disbursement (COD) System uses the current [and presumably correct] SSN to process records so it isn’t always necessary to change the original “identifying” SSN even if incorrect. Caution: A student may use both the above alternatives to correct an incorrect SSN, that is, he or she may submit an SSN correction to the original application record and file a completely new FAFSA.

If a student becomes aware that he or she has used someone else’s SSN and a CPS identifier has been created incorrectly, the student with the incorrect SSN must file a new FAFSA to create a CPS identifier with the correct SSN and should not submit a SAR/ISIR correction. The student whose SSN was used incorrectly will need to submit a correction FAFSA. [See below]
“Applicants Using Same Social Security Number” for more information.] If the number reported on the FAFSA is correct but isn’t in the SSA database, the student must contact directly a local or regional SSA office to update its database. Once this is done, the student may resubmit the original SSN as a correction and the match should be successful. **NOTE:** the student can’t simply resubmit the SSN as an ISIR correction because the CPS will continue to reject the application until the SSA database is updated.

If the SSN provided on the FAFSA was correct but is incorrect on the SAR/ISIR record due to a CPS keypunch error, the student may contact the Federal Student Aid Information Center at 1-800-433-3243 to get it resolved.

### No Match on Name or Birth Date

If the student’s (or a parent’s) SSN is in the SSA database, but the name or date of birth doesn’t match SSA records, the application will be rejected. If the student’s (or parent’s) name or date of birth is incorrect on the SAR/ISIR, the student should submit corrections to the CPS. If the student’s (or parent’s) name or date of birth on the SAR/ISIR is correct, the student must re-enter the information and submit it to the CPS. The CPS will then override the reject. The student is not required to correct this information with SSA before aid is awarded and disbursed but should correct this information with SSA to prevent matching problems in future years. **NOTE:** If the student reports the current (or later) year as his or her birth date, the application will be rejected and the student must submit a correction.

### Missing Information

No match is performed if the student doesn’t sign the FAFSA or provide a last name or birth date. The FAFSA will be rejected and the student must submit a correction with the missing data.

### Date of Death

If the SSA database shows a date of death with the SSN the student reported, the application will be rejected. The student will either have to correct the SSN reported on the FAFSA or contact SSA if the number he or she reported is correct. Note: in addition to the above date of deathmatch, the CPS will verify that the student’s SSN does not appear on a Master Death File supplied to the CPS by SSA.

### Applicants Using Same Social Security Number

When applicants with similar names report the same SSN by mistake, they may end up with a shared record identifier. The record identifier is the SSN and the first two letters of the applicant’s last name as reported on the initial FAFSA. This record identifier remains the same on all subsequent transactions even if corrections are made to either the SSN or the student’s last name.

If another student submits an application with the same SSN and the first two letters of the last name, the CPS assumes the application is a duplicate application being submitted by the first applicant. The only information that would be accepted from the second application would be either an address or school name change. The student using the wrong SSN **must** correct the
error by filing a new FAFSA.

If the student using the correct SSN filed after the other student, he or she must submit a special type of application called a “correction application.” The correction application will allow the CPS to accept the student’s data instead of treating it as a duplicate and continuing to provide the other student’s data on the SAR/ISIR.

If the student using the correct SSN applied first, his or her data should already be on the SAR/ISIR record and a correction application should not be necessary. However, he or she should make sure that the address and school choices have not been changed, and if so, should make the appropriate corrections.

Both students should keep all copies of all output documents including those from the first FAFSAs filed. This could be important in establishing whether or not an applicant made an application filing deadline. If you believe a correction application is warranted, obtain one by calling 1-800-4FED-AID or CPS/SAIG Technical Support at 1-800-330-5947.

When Does a Student Who Doesn’t Have a Valid SS Number Establish Eligibility?

If a student who was not able to provide confirmation of his or her SSN at the beginning of an academic year provides confirmation of that number at some point during the academic year, the student establishes eligibility for all Title IV programs (Federal Pell Grant, campus-based funds, Federal Direct Loan, and FFELP), for the entire period of enrollment (generally the entire academic year).

Selective Service Registration Compliance

Men between the ages of 18 through 25 are required to register with the Selective Service System. This requirement covers both U.S. citizens, permanent residents, and most other men residing in the U.S. Students required to register with Selective Service must do so to be eligible for FSA funds. Students may register with Selective Service by answering a question on the FAFSA or register online at the Selective Service website at http://www.sss.gov. Students who have questions about the Selective Service registration requirement may contact the Selective Service at 1-847-688-6888.

In addition to females, major exceptions to the registration requirement are:

- men born before 1960;
- males currently in the armed services and on active duty (does not apply to members of the Reserve and National Guard, not on active duty);
- males who are not yet 18 at the time they complete their FAFSA (an update is not required during the year, even if a student turns 18 after completing the application);
- citizens of the Freely Associated States;
- non-citizens who first entered the U.S. after they turned 26 (If a male immigrant can show proof of his date of birth from a driver’s license, state ID, birth certificate or passport and his immigration entry date into the U.S. from a) a date stamp on their I-94 form, b) a dated passport immigration stamp entry, or c) a letter from USCIS indicating his entry date, this is sufficient documentation that he is clearly not required to register and no Selective Service Status Information Letter is needed);
- non-citizens who entered the U.S. as lawful non-immigrants on a valid visa and remained
in the U.S. on the terms of that visa until after they turned 26. If a male immigrant can show proof of his date of birth from a driver’s license, state ID, birth certificate or passport and his immigration entry date into the U.S. prior to age 26 from a) a date stamp on their I-94 form, b) a dated passport immigration stamp, c) a letter from the USCIS indicating entry into the U.S., or d) a student visa form (I-20) or other valid U.S. passport visa stamp with expiration date (dates must be from entry date until age 26).

- Individuals who are born female and have changed their gender to male.

There are other less common situations where registration isn’t necessary. If a student wasn’t required to register prior to meeting one of the following criteria and continues to meet one of these for the entire time through age 25, they are exempted from the registration requirement. These are:

1. Students who are unable to register due to being hospitalized, incarcerated, or institutionalized.
2. Students who are enrolled in an officer procurement program at the Citadel, North Georgia College, Norwich University, or Virginia Military Institute.
3. Students who are commissioned officers of the Public Health Service on active duty and members of the Reserve of the Public Health Service.
4. Students who are commissioned officers of the National Oceanic and Atmospheric Administration.

If one of these exceptional criteria applies, the school must document the student’s status. If the student is not clearly exempt from the requirement to register, the student must document the exemption by providing a Selective Service Status Information Letter.

**Selective Service Match**

The CPS matches student aid applications with registration records from the Selective Service System. If the match shows that the student is registered, a comment to that effect appears on the student’s SAR/ISIR. The student is considered eligible if the match shows he is still too young to register and if the CPS successfully forwarded the student’s name to Selective Service for registration.

If the Selective Service could not confirm the applicant’s registration, the SAR/ISIR will have a “C” flag printed next to the EFC and one of the following three comments:

- Comment 30: The Selective Service reports that the student has not registered with them.
- Comment 33: The student did not provide enough information for his name to be sent to Selective Service, he is outside the age range for registration, or he did not sign the form.
- Comment 57: The student did not answer “yes” to both items 27 & 28 on the FAFSA.

Until the registration problem is appropriately resolved, the school must withhold all federal student aid funds and must not certify a loan application. Unless the financial aid administrator has documentation proving that a student who receives one of these comments is exempt from registration, the student must present appropriate confirmation (that is, his Selective Service Registration Acknowledgment or his letter of Registration) to the financial aid administrator. Otherwise, if the student does not have any of these documents, he must reconcile the conflict with the Selective Service documenting that he is registered or that he is exempt from registering. Selective Service does not provide letters for females because females are not required to register.
Failure to Register

In recent years, a number of students have been denied aid because they failed to register with the Selective Service before their 26th birthday. The Selective Service will only register males age 18 through 25 leaving older students with no way to remedy their earlier failure to register. However, these students may still be eligible to receive aid if they can demonstrate that they did not knowingly and willfully fail to register.

A student who served on active duty in the armed forces but did not register before turning 26 is still eligible to receive federal aid because it is presumed that a person who has actually served in the armed forces was not trying to avoid registering for the draft. The administrator should obtain the student’s DD-214, “Certificate of Release or Discharge from Active Duty,” which shows military service in the armed forces – other than the reserve forces, the Delayed Entry pool, and the National Guard – and a released under a condition other than dishonorable.

The financial aid administrator must determine whether a student who has not served in active duty knowingly and willfully failed to register; that is, whether the student knew of the registration requirement but, nevertheless, chose not to register. The financial aid administrator’s decision is final and cannot be appealed to the Department of Education. However, the Department will hear appeals from students who have provided their schools with proof of compliance with the registration requirement (i.e., that they are registered or exempt from registration) but who are still being denied federal student aid based on the registration requirement.

When deciding whether the student knowingly and willfully failed to register, the financial aid administrator should consider the following factors:

1. Where the student lived when he was age 18 to 25. For example, if a student was living abroad, it is more plausible that he would not come into contact with the requirement for registration.

2. Whether the student claims that he thought he was registered. Mistakes in record keeping can occur. Correspondence indicating an attempt to register could form a basis for determining that the student did not knowingly and willfully fail to register. On the other hand, a letter from Selective Service stating that it received no response to correspondence sent to the student at a correct address would be a negative factor.

3. Why the student was not aware of the widely publicized requirement to register when he was age 18 through 25.

Selective Service Status Information Letters

A student who cannot prove that s/he meets one of the allowable exemptions regarding registration or document that he has served in active duty in the armed forces must write to Selective Service to obtain a Status Information Letter addressing the failure to register. The student should provide as complete a description about his situation as possible: where he was living during the period when he should have registered, whether he was incarcerated or institutionalized, his citizenship status during the period, if applicable, and so on. In reply, the student will receive a coded Status Information Letter which he should submit to the FAA. The letter codes are listed here:

- **E1-E8** – the student was not required to register or was exempt the entire time he could have registered (ages 18 through 25).
NM – student did not register although he was on active duty in the armed forces only for a portion of the time when he could have registered (between ages 18 through 25) and was, therefore, required to register.

NR – the student was born before 1960 and not required to register.

RD – student provided a reason or documentation of an exemption from registering but Selective Service determined the reason or documentation to be invalid.

RH – the student was sent one or more letters requesting that the register during the required period, but all letters were returned by the post office.

RL – the student was required to register but Selective Service has no record of his registration; records show one or more letters were sent requesting his compliance with the requirement during the period he was required to be registered.

RR – the student said he tried to register but Selective Service has no proof that he did.

If the student receives a “general exemption letter” (codes E1-E8) or a “1960” letter, the student is exempt from registration and may receive FSA funds. If the student receives any other type of letter, the school must determine (based on all relevant evidence) whether the student knowingly and willfully failed to register. Most of these letters state that the final decision regarding the student eligibility rests with the agency awarding funds. For the purposes of the FSA programs, the decision is made by the financial aid administrator who represents the Department.

Decisions about FSA eligibility for a man who failed to register with Selective Service should not be based solely on the letter codes but should be considered part of the evidence that shows the failure to register was neither willful nor knowing. For example, if the student received a code RL letter (indicating a compliance letter had been sent), this would be a negative factor when the financial aid administrator makes the determination. If the student received a “Military Service: Non-continuous” letter (code NM), the financial aid administrator may reasonably determine that the student did not knowingly and willfully avoid registration. If the school’s financial aid administrator determines that the student’s failure to register was knowingly and willful, the student loses FSA eligibility.

If the Selective Service System response time is longer than 30 days and if you have no evidence that a student intentionally failed to register, you may award and disburse aid without having received the SSS response. If the SSS response or other subsequent information causes you to conclude the student did knowingly and willfully fail to register, then he becomes ineligible for Federal Student Aid and the student, not your school, is responsible for returning the aid he received.

**Registration Acknowledgement or Verification Postcard**

If a student claims to have registered, he may provide a Registration Acknowledgment or Verification postcard or letter of registration confirmation as valid proof of registration. According to ED, a “returned postal receipt from the Selective Service” is the actual receipt that results from the “Returned Receipt Requested” form mailed to registrants by Selective Service and proves that the registration was received by Selective Service. A signed receipt or statement from the postmaster who collected the student’s registration form is not acceptable documentation because it “does not prove that the registration was actually received by Selective Service.”

**Online Verification of Selective Service Registration**

Colleges may verify a student’s Selective Service registration online by accessing the Selective
When Does a Student Who Failed to Register Establish Eligibility?

If a student fails to establish that he meets the Selective Service registration requirements at the beginning of an academic year, but meets them at some point during the academic year while still enrolled, the student establishes eligibility for all federal aid programs (Federal Pell Grant, campus-based federal aid programs, Federal Direct, and FFELP), for the entire period of enrollment (generally the entire academic year) in which proper registration status was determined.

<table>
<thead>
<tr>
<th>Category</th>
<th>Must Register *</th>
<th>Not Required to Register</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>All male citizens born after December 31, 1959, who are 18 but not yet 26 years old, except as noted below:</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Members of the Armed Forces on Active Duty</td>
<td></td>
<td>X**</td>
<td>Copy of DD-214</td>
</tr>
<tr>
<td>Cadets and Midshipmen at the Service Academies or Coast Guard Academy</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Cadets at the Merchant Marine Academy</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Students on Officer Procurement Program ***</td>
<td></td>
<td>X**</td>
<td></td>
</tr>
<tr>
<td>National Guardsmen and Reservists not on Active Duty (active duty for training does not constitute “active duty” for registration purposes)</td>
<td>X**</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Delayed Entry Program Enlistees</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ROTC Students</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Separates from Active Military Service</td>
<td>X**</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Males Rejected for Enlistment</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Civil Air Patrol Members</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Must Register*</td>
<td>Not Required to Register</td>
<td>Documentation</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>---------------</td>
<td>---------------------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Aliens ****</td>
<td>X</td>
<td></td>
<td>Should provide a copy of unexpired Forms I-94, I-95A or Border Crossing Document I-85, I-186, I-586, I-444. If forms are expired or the legal status of the alien has changed, the alien must register.</td>
</tr>
<tr>
<td>Lawful Non-immigrants on visas (e.g. Diplomatic and consular personnel and families, foreign students, tourists)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nationals or Citizens of the Republic of the Marshall Islands or the Federated States of Micronesia</td>
<td></td>
<td>X</td>
<td>Documentation of citizenship. Exception: If the individual has lived in the U. S. for more than a year for a purpose other than being a student or employee of his homeland, he must register.</td>
</tr>
<tr>
<td>Permanent Resident Aliens</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Refugee, Parolee, and Asylees Aliens</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Undocumented Illegal Aliens</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dual National U.S. Citizens</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CONFINED MALES</td>
<td></td>
<td>X**</td>
<td>If incarcerated, must have a letter from the head of the incarceration facility. If hospitalized or institutionalized, must have physician’s statement or letter from the head of hospital or institution.</td>
</tr>
<tr>
<td>Incarcerated, hospitalized or institutionalized for medical reasons</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HANDICAPPED</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Able to function in public with assistance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not able to function in public</td>
<td>X</td>
<td></td>
<td>Physician’s statement or sworn statement of the person who is responsible for applicant’s well-being.</td>
</tr>
<tr>
<td>Females</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>U.S. citizens or immigrants who are born male and have changed their gender to</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
female.

Individuals who are born females and have changed their gender to male.

* Men age 26 years or older and have not registered must submit a written request to the Selective Service System, General Counsel’s Office, Washington, D.C. 20435, for an advisory opinion stating why he failed to register.

** MUST register within 30 days of release unless already 26 or already registered when released or unless exempt during the entire period 18 to 25

*** Students enrolled at The Citadel, North Georgia College, Norwich University, and Virginia Military Institute.

**** Residents of Puerto Rico, Guam, Virgin Islands, and the Northern Mariana Islands are U.S. Citizens, Citizens of American Samoa are U.S. Nationals and must register upon establishing residence in the United States.

FOR FURTHER INFORMATION WRITE: SELECTIVE SERVICE SYSTEM, REGISTRATION INFORMATION OFFICE, P.O. Box 4638, NORTH SUBURBAN, ILLINOIS 60197-4638 OR CALL THE TOLL FREE NUMBER: 1-800-621-3308.

<table>
<thead>
<tr>
<th>Summary of Selective Service Status Information Letters</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Letter Type</strong></td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>E4</td>
</tr>
<tr>
<td>NM</td>
</tr>
<tr>
<td>E2 E3 E5</td>
</tr>
<tr>
<td>E1 E6 E7</td>
</tr>
<tr>
<td>NR</td>
</tr>
<tr>
<td>Code</td>
</tr>
<tr>
<td>------</td>
</tr>
<tr>
<td>RD</td>
</tr>
<tr>
<td>RL</td>
</tr>
<tr>
<td>RH</td>
</tr>
<tr>
<td>RR</td>
</tr>
</tbody>
</table>

** Final determination of ineligibility is left with the FAA. If documentary evidence contrary to Selective Service’s findings is presented, the student may be found to be eligible.
NSLDS Financial Aid History

Students who have previously attended other colleges may have a financial aid history that adversely affects their eligibility for FSA funds at their present college. A student’s financial aid history is maintained and can be reviewed using the National Student Loan Data System (NSLDS). NSLDS can also help track changes to the student’s financial aid history through the Post-Screening and Transfer Monitoring processes. In general, a student is not eligible for federal student aid funds if he or she is in default or owes a repayment on a federal student aid grant or loan or is subject to a judgment lien for a federal debt. Similarly, a parent may not borrow a PLUS Loan on the student’s behalf if either the student or the parent is in default or owes a repayment on a federal student aid grant or loan. Students are also ineligible if they have exceeded annual or aggregate loan limits or have already been paid 100% of a scheduled Pell grant.

NSLDS Match

When the FAFSA is processed, the CPS matches the student against the National Student Loan Data System (NSLDS) to see if the student is in default, owes an overpayment or has exceeded loan maximums. The FAA must resolve any conflicts between the NSLDS information and any other information known about the student before awarding and disbursing federal student aid funds.

Note: the CPS doesn’t perform any matches to determine whether or not the student is subject to a judgment lien for a federal debt, and the administrator isn’t required to check for such liens. However, if it is discovered that the student is subject to such a lien, then he or she is not eligible for FSA funds.

The results of the NSLDS match are provided on the SAR/ISIR on the NSLDS Financial Aid History page and in the FAA Information Section. As is the case for other matches, a “C” next to the student’s EFC indicates a problem that must be resolved.

Match Successful

The SAR/ISIR will contain NSLDS financial aid history information if the student identifying information matches the database and there is relevant information in the database. Financial aid history will not be supplied on a rejected application. If the student has no defaults or overpayments or is in satisfactory repayment status, the NSLDS match flag will be 1 and no C code will appear on the output document. A match flag of 2, 3, or 4 with a C code indicates that the student has defaulted loans, owes an overpayment or both. Documentation must be provided that shows the problem to be resolved before disbursing aid. This means accounting for each defaulted loan or overpayment and affirming its current status by individually or collectively matching them to the documentation submitted by the loan holder or overpayment data provider.

Partial Match

If the student’s SSN is in the NSLDS database, but the first name and date of birth do not match what was reported on the FAFSA, then no financial aid history will be reported. The SAR/ISIR will have the C code and a comment explaining that financial aid history was not provided for this SSN because of the name/birth date discrepancy. The comment will direct the student to work with the school to resolve any discrepancies. If the student originally reported incorrect
information on the FAFSA, the student should make the appropriate corrections so that the correct data can be matched with the NSLDS database.

The FAA may access NSLDS directly using the student’s reported SSN to see if the NSLDS record belongs to the student. A decision can be made by considering whether the information on NSLDS is consistent with other information known about or provided by the student (for example, the student may show evidence of a legal name change). If the discrepancy is the result of the student misreporting the name or date of birth on the FAFSA, the student should submit corrections to the ISIR record. However, the information on NSLDS can be used to determine the student’s eligibility before the corrected data is reported.

If it is found that the financial aid history associated with the student’s SSN doesn’t belong to the student, it may be assumed that the student has no relevant financial aid information. Although it isn’t required, the school or the student should contact the agency that misreported someone else’s data using the student’s SSN. [See Dear Colleague Letter GEN-96-13 for further information.]

**Using the NSLDS Customer Care Center To Resolve Data Conflicts**

The NSLDS Customer Care Center (CCC) is authorized to assist in the resolution of data conflicts that affect the student’s Title IV eligibility, such as an incorrect student identifier (i.e., the student’s first name, date of birth or SSN), an incorrect default or overpayment status, an incorrect award amount, or a duplicate record. Schools may report data conflicts directly to the NSLDS CCC by phoning 1-800-999-8219 and selecting option 3 or sending an e-mail to NSLDS@ed.gov.

The definition of a data conflict **does not** include a current year Pell Grant issue, a loan status that has recently changed, incorrect information in the history portion of a student’s record, loan status that does not affect the student’s eligibility, the aggregate loan determination for Consolidation Loans, or an incorrect middle or last name of a student.

When a school reports a data conflict to CCC, a tracking number is assigned to the reported conflict. The school must also provide documentation that substantiates the requested data change along with the assigned tracking number before the CCC will begin working with the school to resolve the conflict. When the conflict is resolved, the data will be changed and the student notified. Note: the CCC cannot help students directly. Students who contact the CCC will be referred back to the school, the FSA Information Center, or to the Loan Ombudsman.

**Student Not in Database or No Relevant History**

If a match with NSLDS is completed but there’s no information on the student in the database, or if the student’s SSN matches a record in the database but there’s no relevant financial aid history to report, it can be assumed that the student has no financial aid history that would affect his or her eligibility for federal student aid funds (unless the FAA is in possession of conflicting information).
Processing Problem

If a match with the NSLDS database cannot be conducted due to a processing problem, it may be necessary to request a duplicate SAR/ISIR in order for the record to be sent through the NSLDS match again. If corrections need to be made to the FAFSA data, the NSLDS match will be conducted again when the corrections are processed.

Changes After Initial Match – Post-Screening

A school is only responsible for the financial aid history information it obtained from NSLDS at the time it made a disbursement of Title IV aid. NSLDS informs schools whenever significant changes to a student’s financial aid history that might affect eligibility occur by means of post-screening. When these history changes are identified, new output documents are generated and the schools listed on the receipt of the student’s FAFSA information are notified. Schools are responsible for reviewing such changes to the student’s financial aid history to be sure there have been no changes that affect the student’s eligibility.

A school isn’t held liable for any funds it disbursed to the student even if subsequent information from the NSLDS database (or any other reliable source) indicates that the student was not eligible for all or a portion of that aid, unless the school had access to conflicting information that showed a lack of, or reduced eligibility for, such aid.

However, once a school becomes aware through NSLDS or any other means that a student is no longer eligible and/or was not eligible for aid previously disbursed, it must:

- Not disburse or deliver additional funds; and
- Help make sure the student arranges to repay the aid for which he or she wasn’t eligible.

Checking Financial Aid History for Transfer Students

The financial aid history of any student transferring to your school must be reviewed on the ISIR or online at the NSLDS website to determine:

- whether the student is in default or owes an overpayment on a federal student loan or grant;
- the student’s scheduled Pell Grant and the amount(s) already disbursed for the award year;
- the student’s balance on all federal student aid loans;
- data pertaining to TEACH grants, including those converted to loans;
- the amount of and period of enrollment for all federal student loans for the award year.

Through the transfer monitoring process, NSLDS checks a transfer student’s financial aid history and alerts the school to any history changes at other schools affecting the student’s current awards. In most cases, with transfer monitoring initiated, the financial aid history on the ISIR will be enough, though there may be instances where NSLDS may have more information if, for example, a student has more than 6 loans.

There are three steps involved in initiating the transfer monitoring process: Inform, Monitor, and Alert. Students transferring into a school must be identified and reported to NSLDS as “Inform” files. Schools may not disburse any FSA funds to a student for 7 days after the transfer monitoring request is made to NSLDS, unless the response is received earlier than 7 days or unless the FAA checks the student’s history directly by accessing the NSLDS website.

NSLDS monitors these students for a change in financial aid history that may affect their current
awards and alerts the school when:

- a new loan, Pell Grant, is being awarded,
- a new disbursement is made on a loan, Pell Grant, or
- a loan or Pell Grant (or a single disbursement thereof) is canceled.

**Note:** defaulted loan and overpayment information is not monitored in the transfer monitoring process as it is already covered by post-screening.

Finally, when NSLDS creates an alert for one or more students at the informed school, it sends an e-mail notice to the school’s designated contact person. That person accesses the alert list on the NSLDS FAP website or from an electronic batch file, reviews the revised financial aid history and makes appropriate adjustments to any awards either disbursed or scheduled to be disbursed.

If the school has followed these procedures for obtaining financial aid history information from NSLDS for its transfer students, it is not liable for any overpayments if the student’s situation subsequently changes. However, the student will be liable for any overpayments in this situation and would lose eligibility for further disbursements until the overpayment is resolved.

**Data Provider Information**

If a school believes that NSLDS information about a transfer student is incorrect, it may obtain official documentation from the appropriate data provider and can rely on that documentation. For example, if NSLDS shows that a student received $3000 in Pell Grant from a prior school, but the student claims to have received only $1500, the school could contact the prior school and obtain documentation of the correct amount. It could then rely on that documentation in making eligibility and award determination.

**Resolving Default Status**

A student who is in default on a federal student loan cannot receive further federal student aid until the default status is resolved. This can be done in a number of ways.

- **Repayment in Full.** A student can resolve a default by repaying the loan in full. The Financial Aid Office may verify a federal loan has been paid in full by reviewing the Loan Access Code, DP (Defaulted, The Paid-In-Full), in NSLDS or get a letter from the student loan servicer stating that the specific defaulted loan is paid-in-full.

- **Federal Loan Consolidation.** A student can resolve a federal student loan default by consolidating their defaulted loans into a Direct Loan Consolidation. A student may complete this application online at [www.studentloans.gov](http://www.studentloans.gov). As part of the loan consolidation application students must choose an Income-Driven Repayment Plan (IDR). The Financial Aid Office may verify the federal loan consolidation has been completed reviewing the Loan Access Code, DN (Defaulted, Paid in Full through Consolidation Loan), in NSLDS. Once the loan is consolidated the student may go into a federal in-school deferment as long as they maintain at least half-time enrollment.

- **Income Tax Offset.** Under the terms of a borrower, MPN federal and state governments may garnish a borrower's tax refund. If the garnished amount satisfies the outstanding loan amount the default may be resolved.

- **Satisfactory Repayment Arrangements.** A student in default on a federal student loan can regain eligibility and remove the default from their credit report. For a student to
achieve both of these goals they need to follow the steps listed below. The Financial Aid Office may review the Loan Access Code, DX (Defaulted, Satisfactory Arrangement, and Six Consecutive Payments Made), in NSLDS. Prior to subsequent disbursements colleges are required to contact the loan servicer to confirm that the student has continued making the required payments.

- **Student Financial Aid (SFA) Reinstatement** - If a student makes satisfactory repayment arrangements with their loan holder and makes six consecutive, full, voluntary, timely payments they may have their eligibility reinstated for federal financial aid. The Financial Aid Office may use as documentation receipt of an SFA Reinstatement Letter from the loan holder. This reinstatement letter should be sent or faxed directly to the Financial Aid Office. Note reinstatement makes the student eligible for financial aid but does not remove the default from the students SFA account.

- **Loan Rehabilitation.** Students who have completed SFA reinstatement (six payments) should continue making payments to total a minimum of nine consecutive, full, voluntary, timely payments in order to complete loan rehabilitation. Garnishment is not considered a voluntary payment. Loan rehabilitation will remove the loan from default and will restore eligibility for all the normal loan benefits, such as in-school deferments, other deferments, and Income-Driven Repayment Plans. Loan rehabilitation also removes the default from credit bureaus. It does not remove any delinquency activity leading up to the loan rehabilitation.

Write-offs written by a lender does not remove the student’s default. For Perkins, if the school writes off a regulator permissible amount and the student repays the remaining balance of the loan, that counts as paying the loan in full (code DC). For the Perkins Loan Program, a student who has repaid their defaulted loan in full is eligible for aid if the repayment was voluntary, you can still consider the default to be evidence of a student’s unwillingness to repay loans and deny the student additional Perkins Loans. If the repayment was involuntary, you should consider the default as such evidence and deny the student additional Perkins Loans. If a student has paid a defaulted loan in full but the ISIR has a comment showing that the student is ineligible because of the default, the student must provide documentation. The Financial Aid Office may verify the federal loan has been written off by accessing NSLDS and looking for code DW (Defaulted, Write-Off).
# Loan Status Codes and Title IV Eligibility Chart

<table>
<thead>
<tr>
<th>CODE</th>
<th>STATUS</th>
<th>TITLE IV ELIGIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>Abandoned Loan</td>
<td>Yes</td>
</tr>
<tr>
<td>BC</td>
<td>No Prior Default, Bankruptcy Claim, Discharged</td>
<td>Yes – the loan was not in default and was discharged</td>
</tr>
<tr>
<td>BK</td>
<td>No Prior Default, Bankruptcy Claim, Active</td>
<td>Yes – the loan was not in default</td>
</tr>
<tr>
<td>CA</td>
<td>Canceled (Perkins: Loan Reversal)</td>
<td>Yes</td>
</tr>
<tr>
<td>CS</td>
<td>Closed School Discharge</td>
<td>Yes</td>
</tr>
<tr>
<td>DA</td>
<td>Deferred</td>
<td>Yes</td>
</tr>
<tr>
<td>DB</td>
<td>Defaulted, then Bankrupt, Active (Perkins: all bankruptcies; FFELP or Direct Loans: Chapter 13)</td>
<td>No, unless the debtor can show that loan is dischargeable. See Dear Colleague Letter GEN-95-40, dated Sept. 1995</td>
</tr>
<tr>
<td>DC</td>
<td>Defaulted, Compromise</td>
<td>Yes -- compromise is the same as paid in full</td>
</tr>
<tr>
<td>DD</td>
<td>Defaulted, Then Died</td>
<td>No, if the borrower is reapplying, loan status is in error</td>
</tr>
<tr>
<td>DE</td>
<td>Death</td>
<td>No, if the borrower is reapplying, loan status is in error</td>
</tr>
<tr>
<td>DF</td>
<td>Defaulted, Unresolved</td>
<td>No</td>
</tr>
<tr>
<td>DI</td>
<td>Disability</td>
<td>Yes</td>
</tr>
<tr>
<td>DK</td>
<td>Defaulted, Then Bankrupt, Discharged (Perkins: all bankruptcies; FFELP or Direct Loans: Chapter 13)</td>
<td>Yes – defaulted loan has been totally discharged</td>
</tr>
<tr>
<td>DL</td>
<td>Defaulted, In Litigation</td>
<td>No</td>
</tr>
<tr>
<td>DN</td>
<td>Defaulted, Then Paid In Full Through Consolidation Loan</td>
<td>Yes</td>
</tr>
<tr>
<td>DO</td>
<td>Defaulted, Then Bankrupt, Active, other (for FFELP and Direct Loans in Chapters 7, 11, and 12)</td>
<td>No, unless the debtor can show that the loan is dischargeable. See Dear Colleague Letter GEN-95-40, dated Sept. 1995</td>
</tr>
<tr>
<td>DP</td>
<td>Defaulted, Then Paid In Full</td>
<td>Yes – the loan was paid in full</td>
</tr>
<tr>
<td>DR</td>
<td>Defaulted Loan Included in Roll-Up Loan</td>
<td>Yes – the loan was combined with other loans and subrogated to ED which reported the same information to NSLDS in one loan – the status of that loan determines eligibility</td>
</tr>
<tr>
<td>DS</td>
<td>Default, Then Disabled</td>
<td>Yes – loan debt is canceled</td>
</tr>
<tr>
<td>DT</td>
<td>Defaulted, Collection Terminated</td>
<td>No</td>
</tr>
<tr>
<td>DU</td>
<td>Defaulted, Unresolved</td>
<td>No</td>
</tr>
<tr>
<td>DW</td>
<td>Defaulted, Write-Off</td>
<td>No [Note that there is no status code for Perkins write-offs, which are for amounts less than the original amount]</td>
</tr>
<tr>
<td>CODE</td>
<td>STATUS</td>
<td>TITLE IV ELIGIBILITY</td>
</tr>
<tr>
<td>------</td>
<td>--------</td>
<td>---------------------</td>
</tr>
<tr>
<td>DX</td>
<td>Defaulted, Satisfactory Arrangements, and 6 Consecutive Payments Made</td>
<td>Yes, Yes, assuming student complies with repayment plan or forbearance granted by GA</td>
</tr>
<tr>
<td>DZ</td>
<td>Defaulted, 6 Consecutive Payments, Then Missed Payment</td>
<td>No, the loan has returned to an active default status</td>
</tr>
<tr>
<td>FB</td>
<td>Forbearance</td>
<td>Yes</td>
</tr>
<tr>
<td>FC</td>
<td>False Certification Discharge</td>
<td>Yes</td>
</tr>
<tr>
<td>FR</td>
<td>Loans obtained by borrowers convicted of fraud in obtaining Title IV aid</td>
<td>No</td>
</tr>
<tr>
<td>FX</td>
<td>Loan once considered fraudulent but now resolved</td>
<td>Yes</td>
</tr>
<tr>
<td>IA</td>
<td>Loan Originated</td>
<td>Yes</td>
</tr>
<tr>
<td>ID</td>
<td>In School or Grace Period</td>
<td>Yes</td>
</tr>
<tr>
<td>IG</td>
<td>In Grace Period</td>
<td>Yes</td>
</tr>
<tr>
<td>IM</td>
<td>In Military Grace</td>
<td>Yes</td>
</tr>
<tr>
<td>IP</td>
<td>In Post-Deferment Grace (Perkins only)</td>
<td>Yes</td>
</tr>
<tr>
<td>OD</td>
<td>Defaulted, Then Bankrupt, Discharged, (for FFELP and Direct Loans in Chapters 7, 11 or 12)</td>
<td>Yes, the defaulted loan has been totally discharged</td>
</tr>
<tr>
<td>PC</td>
<td>Paid In Full Through Consolidation Loan</td>
<td>Yes – consolidation loan can be through FFELP or Direct Loan; underlying loans can be in default</td>
</tr>
<tr>
<td>PD</td>
<td>Permanently Disabled</td>
<td>Yes</td>
</tr>
<tr>
<td>PF</td>
<td>Paid In Full</td>
<td>Yes</td>
</tr>
<tr>
<td>PM</td>
<td>Presumed Paid In Full</td>
<td>Yes</td>
</tr>
<tr>
<td>PN</td>
<td>Non-defaulted, Paid In Full Through Consolidation Loan</td>
<td>Yes</td>
</tr>
<tr>
<td>PX</td>
<td>Identity Theft Discharged</td>
<td>Yes</td>
</tr>
<tr>
<td>PZ</td>
<td>PLUS Loan for a student who has died</td>
<td>No for student Yes for parent</td>
</tr>
<tr>
<td>RF</td>
<td>Refinanced</td>
<td>Yes, defaulted loans can’t be refinanced</td>
</tr>
<tr>
<td>RP</td>
<td>In Repayment</td>
<td>Yes</td>
</tr>
<tr>
<td>UA</td>
<td>Temporarily Uninsured – No Default Claim Requested</td>
<td>Yes</td>
</tr>
<tr>
<td>UB</td>
<td>Temporarily Uninsured – Default Claim Denied</td>
<td>Yes, because the loan is not a federal loan while temporarily uninsured</td>
</tr>
</tbody>
</table>
When Does a Student Regain FSA Eligibility After Resolving a Defaulted Loan?

**Federal Pell Grant/Campus-Based Funds**
For awarding and disbursing Pell Grant and campus-based program funds, a student who resolves a default on a federal student loan within the award year regains eligibility for these programs retroactively only to the beginning of the most recent payment period during which the default was resolved (usually the semester).

For example, if a student was enrolled in a Fall/Spring semester-based academic year and was in default on a federal loan at the beginning of that academic year, and if this same student resolved the default sometime after the end of the Fall semester, but before the end of the Spring semester, he or she would be eligible to receive Pell Grant or campus-based funds only for the Spring semester. This student would not be eligible to receive these funds for the Fall semester.

**Federal Direct Loans**
For Direct Loan program funds, the student who is in default on a federal educational loan regains eligibility for Direct Loan funds for the entire period of enrollment during which the default was resolved. Since the Direct Loan program does not use payment periods, for most students this would be for the entire academic year.

When Does a Student Regain FSA Eligibility After Resolving an FSA Grant or Loan Overpayment?
If a student owes an overpayment on a federal student aid grant or loan at the beginning of an academic year but resolves the overpayment at some point during the academic year, the student regains eligibility as follows:

**Federal Pell Grant/Campus-Based Funds**
For the Federal Pell Grant and campus-based programs, the student regains eligibility

---

<table>
<thead>
<tr>
<th>CODE</th>
<th>STATUS</th>
<th>TITLE IV ELIGIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>UC</td>
<td>FFEL: Permanently Uninsured/Un-reinsured – Non-defaulted Loan Perkins: Non-defaulted Loan Purchased By School</td>
<td>Yes</td>
</tr>
<tr>
<td>UD</td>
<td>FFEL: Permanently Uninsured/Un-reinsured – Defaulted Loan Perkins: Defaulted Loan Purchased By School</td>
<td>Yes, the loan is no longer a federal loan</td>
</tr>
<tr>
<td>UI</td>
<td>Uninsured/Un-reinsured</td>
<td>Yes, does not matter if the loan was in default</td>
</tr>
<tr>
<td>VA</td>
<td>Veterans Administration Discharge</td>
<td>Yes</td>
</tr>
<tr>
<td>XD</td>
<td>Defaulted, Satisfactory Arrangements, and 6 Consecutive Payments Made</td>
<td>Yes, assuming student complies with repayment plan or forbearance granted by GA</td>
</tr>
</tbody>
</table>
retroactively to the beginning of the most recent payment period during which the overpayment was resolved.

As in the example for the student who had defaulted on a federal student loan, if a student was enrolled in a Fall/Spring semester-based academic year and owed an overpayment at the beginning of that academic year, and if this same student resolved the overpayment sometime after the end of the Fall semester, but before the end of the Spring semester, he or she would be eligible to receive these funds only for the Spring semester. This student would not be eligible to receive Pell Grant or campus-based funds for the Fall semester.

**Direct Loan and FFEL Programs**

For Direct Loan and FFEL program funds, the student regains eligibility for the entire period of enrollment during which the overpayment was resolved. For most students, this would be for the entire academic year since these programs do not use payment periods.

**Default on a Student Loan Made at a Closed School**

If the school closed while the student was still enrolled, the student may be able to have the student loan discharged if all of the following conditions are met:

1. The loan was received on or after January 1, 1986.
2. The student was enrolled at the school or on an approved leave of absence on the day the school closed, or the school closed within 90 days after the student withdrew from the school.
3. The student has not completed, and is not in the process of completing, his/her program of study, either by transferring academic credits or hours earned at the closed school to another school or by any other means.

If the student believes he/she is eligible to have the loan discharged based on the criteria given above, the student should contact the holder of the loan to apply for the discharge. If the student is not eligible for this loan discharge, he/she should contact the holder of the loan to find out the best way to resolve the default status, including loan rehabilitation and loan consolidation.

**NOTE:** If the loan was discharged because the school closed while the student was enrolled, but he/she later completed the program of study at another school by transferring one or more credit hours from the closed school, the closed school loan discharge may be canceled and the loan may have to be repaid.

**Effect of Bankruptcy or Disability Cancellation**

A student who has filed bankruptcy or had a loan discharged for disability may need to provide some additional documentation before receiving aid.

**Bankruptcy**

A student with a federal student aid loan or a grant overpayment that has been discharged in bankruptcy remains eligible for federal student loans, grants, and work-study. A borrower does not have to reaffirm a loan discharged in bankruptcy in order to be eligible. The Bankruptcy Reform Act of 1994 prohibits denial of aid based solely on a bankruptcy discharge.

A borrower who has listed a defaulted federal student loan or a grant overpayment in an active bankruptcy claim may be eligible for further federal student aid funds if the borrower submits documentation from the holder of the loan that the debt is dischargeable.
A borrower who includes a non-defaulted federal student loan in an active bankruptcy claim, so that collection on the loan is stayed, is eligible for federal student aid funds as long as he or she has no loans in default (including the loan included on the bankruptcy petition).

In most cases, the NSLDS Loan Status Code (see the Chart on pp. 2-51 – 2-53 of this chapter) will provide sufficient information on the default or repayment status of any Title IV loan included on a bankruptcy claim.

**Total and Permanent Disability Cancellation**

Perkins, Stafford, and PLUS loan borrowers can have their loans canceled for a total and permanent disability. Except for veterans who qualify for a total and permanent disability discharge (TPD) by the Dept of Veterans Affairs, ED monitors the status of borrowers who have applied for and received a TPD discharge. The monitoring period begins on the day the discharge was granted and lasts for up to three years. If the borrower fails to meet the eligibility requirements throughout the monitoring period, the loan will be reinstated by ED. This same procedure holds for discharging and reinstating the service obligation for TEACH grant recipients who become totally and permanently disabled.

If a borrower whose loan has been discharged wishes to take out a new federal student loan or wishes to receive a TEACH grant, he or she must obtain certification from a legally licensed physician stating that the student 1) has the ability to engage in a substantial gainful activity or 2) can attend school. Then the student must sign a statement indicating that he or she is aware that the new loan or TEACH grant can’t later be discharged on the basis of any present impairment unless that condition substantially deteriorates to the extent that the definition of total and permanent disability is again met.

The borrower isn’t required to obtain a physician’s certification or to sign the statement if he or she is applying for federal grants or work-study only.

If the borrower is in the post-discharge monitoring period, he or she must resume payment on the discharged loan before receiving the new loan or TEACH grant. A borrower who received a VA-determined discharge would not be required to resume payment on the discharged loan.

If a defaulted loan was conditionally discharged, then reinstated, the student would have to make satisfactory repayment arrangements on the reinstated loan before receiving the new loan.

**Regaining Title IV Eligibility After Inadvertent Overborrowing**

Under the Department’s regulations at 34 CFR 668.35(d), a student who has inadvertently exceeded annual or aggregate loan limits, and who is not in default on a Title IV loan, may regain Title IV eligibility if the student: (1) repays the excess loan amount in full; or (2) makes satisfactory arrangements to repay the excess amount, i.e. reaffirmation or consolidation. Reaffirmation and consolidation can be confirmed on NSLDS.

Generally, an institution becomes aware that a student has exceeded an aggregate loan limit from flags (and comments) included in the student’s ISIR that are generated from information contained in NSLDS.

If a student who has inadvertently received loan funds in excess of an annual or aggregate loan limit wishes to receive additional Title IV aid, the institution where the student wishes to receive the aid must identify the loan(s) that resulted in the overborrowing, make a determination that the
overborrowing was indeed inadvertent, discuss the overborrowing with the student, and resolve any discrepancies in the information that is obtained.

Examples of circumstances that may have resulted in a student inadvertently exceeding an annual or aggregate loan limit include, but are not limited to: institutional processing errors, missing or incorrect NSLDS information (e.g., capitalized interest incorrectly included in a borrower’s aggregate outstanding loan balance), or unintentional student error or omission.

- **Repayment of the Excess Loan Amount**
  If a student who has inadvertently overborrowed wishes to regain Title IV eligibility by repaying the excess loan amount, the student must contact the applicable servicer and comply with the servicer’s repayment instructions.

Once the student has repaid the excess loan amount in full, the servicer will send the student confirmation that the excess loan amount has been repaid. The student or servicer must provide a copy of the repayment confirmation to the institution. The inadvertent overborrowing is considered to have been resolved as of the date the servicer received the borrower’s full payment of the excess loan amount.

- **Making Satisfactory Repayment Arrangements for the Excess Loan Amount (Reaffirmation)**
  A student who has inadvertently overborrowing may regain Title IV eligibility by making satisfactory repayment arrangements acceptable to the servicer of the loan. The satisfactory repayment arrangement requirement can be met if the student reaffirms the debt by agreeing, in writing, to repay the excess amount according to the terms and conditions of the promissory note supporting the loan.

  **Note:** If NSLDS shows that a student consolidated the loan(s) that resulted in the inadvertent overborrowing into a Direct Consolidation Loan (or, prior to July 1, 2010, into a FFEL Consolidation Loan), no further action on the part of the borrower is needed, since by signing the consolidation loan promissory note the borrower has agreed to repay any excess loan amount.

The reaffirmation process includes the following steps:

1. Either the institution or the student contact the servicer and explains that the student has inadvertently over-borrowed and wishes to reaffirm the debt.
2. The servicer sends the student a reaffirmation agreement.
3. The student reads signs and returns to the servicer the reaffirmation agreement.
4. The servicer sends the student confirmation that the reaffirmation agreement has been accepted. The student or servicer must provide a copy of the reaffirmation confirmation to the institution.
5. The inadvertent over-borrowing is considered to have been resolved as of the date the servicer receives the student’s signed reaffirmation agreement.

**Effective Date for Regaining Title IV Eligibility**

When an otherwise eligible student resolves an inadvertent over-borrowing issue by one of the methods discussed above, the student regains eligibility for the Pell Grant, campus-based, TEACH Grant, and Iraq and Afghanistan Service Grant programs beginning with the payment period in which the issue was resolved, and regains Direct Loan Program eligibility retroactive to the beginning of the academic year in which the issue was resolved.
Unusual Enrollment History Flag

The Unusual Enrollment History Flag indicates whether a student has a pattern of enrollment involving the receipt of Federal Pell Grant (Pell Grant) and Federal Direct loan (except consolidation and parent PLUS) funds at multiple institutions within a four year timeframe and is intended to address possible fraud and abuse in the Title IV student aid programs. The specific enrollment pattern causing concern is one where the student attends an institution long enough to receive Title IV credit balance funds, leaves without completing the enrollment period, enrolls at another institution and repeats the pattern of remaining just long enough to collect another Title IV credit balance without having earned any academic credit. Some students who have an unusual enrollment history have legitimate reasons for their enrollment at multiple institutions. However, such an enrollment history requires a review to determine whether there are valid reasons for the unusual enrollment history.

A UEH Flag value of ‘N’ indicates that there is no unusual enrollment history issue and, thus, no ‘C’ Code, no comments, and no action required by the institution.

A UEH Flag with a value of ‘2’ indicates an unusual enrollment history that requires review by the institution of the student’s enrollment records to determine if the institution must collect additional information about the student’s prior enrollment. An example of an enrollment pattern that would generate a UEH Flag value of ‘2’ would be when the student received Pell Grant funds or Direct Loans at three institutions over two award years.

A UEH Flag with a value of ‘3’ indicates that the institution must review academic records for the student and, in some instances, must collect additional documentation from the student, as explained below. An example of an enrollment pattern that would generate a UEH Flag value of ‘3’ would be when the student received Pell Grant funds at three or more institutions in one award year.

Resolving Unusual Enrollment History Flags

An institution must take the following steps to resolve an ISIR-reported UEH Flag.

- **UEH Flag value is ‘N’**: No action is necessary as the student’s enrollment pattern does not appear to be unusual.
- **UEH Flag value is ‘2’**: The institution must review the student’s enrollment and financial aid records to determine if, during any of the 2014-2015, 2015-2016, 2016-2017, and 2017-2018 award years review period, the student received a Pell Grant and/or Direct loan at the institution that is performing the review. If so, no additional action is required. If not, using information from the National Student Loan Data System (NSLDS), the institution must identify all institutions where the student received a Pell Grant or Direct Loan for any of 2014-2015, 2015-2016, 2016-2017, and 2017-2018 award years. The institution must then determine whether academic credit was earned at each of those institutions during the award year for which the student received a Pell Grant or Direct Loan. Based on those determinations, discussions with the student may be necessary. See Dear Colleague letter GEN-15-05 for additional information.
• If the student received Pell and/or a Direct Loan at the school performing the review, no additional action is required unless there is a reason to believe that the student remained enrolled just long enough to collect student aid funds.

• If the student did not receive Pell and/or a Direct Loan at the school performing the review, or there is a reason to believe that the student remained enrolled just long enough to collect student aid funds, the guidance provided below for a UEH Flag of ‘3’ must be followed.

➤ **UEH Flag value is ‘3’**: The student’s academic records must be reviewed to determine if the student received academic credit at the institutions the student attended during the specified four awards year period. Using information from the National Student Loan Data System (NSLDS), the institution must first identify the institutions where the student received Pell Grant and/or Direct Loan funding during 2014-2015, 2015-2016, 2016-2017, and 2017-2018 award years. Based upon academic transcripts it may already possess, or by asking the student to provide academic transcripts or grade reports, the institution must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant funds. Academic credit is considered to have been earned if the academic records show that the student completed any credit hours or clock hours.

• Academic Credit Earned: If the institution determines that the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required unless the institution has other reasons to believe that the student is one who enrolls just to receive the credit balance. In such instances, the institution must require the student to provide additional information as discussed below under “Academic Credit Not Earned.” If it is determined that academic credit was not earned at one or more of the previously attended institutions, the institution must follow the “Academic Credit Not Earned” guidance below.

• Academic Credit Not Earned: If the student did not earn academic credit at a previously attended institution and, if applicable, at the institution performing the review, the institution must obtain documentation from the student explaining why the student failed to earn academic credit. The institution must determine whether the documentation supports (1) the reasons given by the student for the student’s failure to earn academic credit; and (2) that the student did not enroll only to receive credit balance funds.

In some cases, the student may present personal reasons to explain the failure to earn academic credit. These reasons could include illness, a family emergency, a change in where the student is living, and military obligations. The institution should, to the extent possible, obtain third-party documentation to support the student’s claim.

In other instances, the student may present academic reasons to explain the failure to earn academic credit. For example, a school’s academic program presented unexpected academic challenges or did not meet the student’s needs. Again, the institution should, to the extent possible, obtain third-party documentation to support the student’s claim.

Much like the exercise of professional judgment, as provided by section 479A of the Higher Education Act (HEA), the financial aid administrator determines whether the circumstances of the failure of the student to receive academic credit, as evidenced by the student’s academic records and other documentation, support the continuation of title IV, HEA program assistance eligibility. Also, like professional judgment, these institutional determinations are final and not
appealable to the Department, and the reasons for the decision must be documented and maintained for possible review.

**Approval of Continued Eligibility**

If the institution approves the student’s continued eligibility, the financial aid administrator may choose to require the student to establish an academic plan, similar to the type of plan used to resolve satisfactory academic progress (SAP) appeals as provided in the regulations at 34 CFR 668.34(c) and (d). The financial aid administrator may also wish to counsel the student about the Pell Grant duration of eligibility provisions [Lifetime Eligibility Used (LEU)] and the impact of the student’s attendance pattern on future Pell Grant eligibility.

**Denial of Continued Eligibility**

If a student did not earn academic credit at one or more of the relevant institutions and does not provide, to the financial aid administrator’s satisfaction, an acceptable explanation and documentation for each of those failures, the institution must deny the student any additional Title IV/HEA program assistance. The student must be provided with an opportunity to question and appeal the decision, consistent with the opportunities to question and appeal similar financial aid determinations at the institution such as SAP determinations and professional judgment decisions.

**Regaining Aid Eligibility**

If the institution denies a student continued Title IV/HEA program assistance under the circumstances described above, it must provide the student with information as to how the student may subsequently regain eligibility. Since the basis for the denial is the student’s academic performance, it is expected that successful completion of academic credit would form the basis for the student’s subsequent request for renewal of program eligibility. This could include meeting the requirements of an academic plan that the institution established with the student.

If the student meets the institution’s standards to regain eligibility for Title IV/HEA program assistance, that eligibility would be effective under the same provisions that apply when a student gains or regains eligibility under other student eligibility requirements. For the Pell Grant and campus-based aid programs, eligibility begins with the payment period in which the student begins to meet the eligibility requirements (following the payment period of ineligibility); for Direct Loans, regained eligibility is retroactive to the beginning of the enrollment period.

**Authority**

The authority for an institution to deny Title IV/HEA program assistance under the circumstances described in this letter is section 484(a)(4)(A) of the Higher Education Act of 1965, as amended, which requires the student to sign a Statement of Educational Purpose. By signing the Statement of Educational Purpose as part of the student’s submission of the FAFSA, the student certified that he or she would use the Title IV/HEA program assistance received only to meet educational costs.

**Documenting credits earned when a school has closed**

For UEH flag 3, or when you believe that the student remains enrolled just long enough to collect a credit balance (refund), you must review the student’s academic records to determine if
the student earned any academic credit at each school the student attended during the prior four award year periods (i.e., for 2018-19, assess 2017-18, 2016-17, 2015-16, and 2014-15).

If the student informs you that they previously attended and received Title IV aid at a school which has closed, you must first verify that the school has closed. You may determine this using the Department’s Closed School Reports, at: https://www2.ed.gov/offices/OSFAP/PEPS/closedschools.html

If the student states that academic credits were earned at the closed school, you must request documentation that indicates academic credits were earned. Acceptable forms of documentation could include a grade report, or an official or unofficial transcript.

If the student does not have any documentation of academic credit earned at the closed school, and you have obtained documentation that shows the student earned academic credit at all the other schools corresponding with the UEH flag, you may accept a signed and dated statement from the student to substantiate their claim. The statement must provide the name of the closed school, the academic period or calendar year in which the academic credit was earned, and, if known, the type and number of academic credits which were earned. If the student is unsure of the number and/or type of academic credits earned at the closed school, the student must state, in general terms, that academic credit was earned at the closed school. If the student has not earned academic credits at the closed school, you must follow the guidance in Dear Colleague Letter GEN-15-05.

**CUNY Policy and Systems Support**

Records with a UEH flag on an ISIR will have a CUNYFirst checklist item assigned that will prevent disbursements. The Checklist code will be ‘FUEH’ and the message that will display on the Student Service Center is “Your institution must collect additional information about your previous enrollment history, please contact your Financial Aid Office for further information”.

If the college performing the review is one of the colleges the student has received Pell funds in 2014-2015, 2015-2016, 2016-2017, and 2017-2018 award years, there is no action be taken for students flagged with UEH ‘2’ unless there is a reason to believe fraud or abuse of funds is involved. If there are reasons to believe in abuse of funds or fraud, then transcripts should be requested and reviewed as though the student was flagged as ‘3’.

Students identified with UEH ‘3’ flag should have their college transcripts (may be official or unofficial) reviewed, and based on the review of grades completed and earned credits, the student may need to be placed on an academic plan, similar to those used for meeting Federal Satisfactory Academic Progress. The student may need to submit statements and proof of reasons for failure to meet academic standards. A committee review is recommended for these sets of students as professional judgment will be necessary, but it is up to each institution on how the review, denials of aid and appeals are performed.

The Office of Financial Aid is encouraged not to request duplicative documentation from the students, and as a result, the collaboration of the Admissions and Registrar’s Offices in this process is essential to expedite the review of the enrollment history and determine potential financial aid eligibility.