Volume 1
Student Eligibility

Introduction

This volume of the *Federal Student Aid Handbook* discusses the eligibility requirements for student and parent borrowers and your responsibilities to ensure that recipients qualify for their aid awards.

Sources of Information

There are many factors you must consider when reviewing an application for aid from the FSA programs, such as whether the student is a U.S. citizen or permanent resident, whether the applicant is making satisfactory academic progress, and whether they have a defaulted loan from the Direct Loan, FFEL, or Perkins Loan programs To answer these questions, you will receive information about the student from different sources, including the Department of Education's FAFSA Processing System (FPS) for financial aid applications and the National Student Loan Data System (NSLDS).

Throughout the year, the Department of Education (The Department) provides updates for schools in the form of Dear Colleague Letters (DCLs). These and other releases, such as **Federal Register** notices and electronic announcements, contain system updates and technical guidance, and are available on the Knowledge Center (**fsapartners.ed.gov/knowledge center**).

The FSA Handbook does not cover the operation of software. For schools using software provided by the Department, there are technical references on FSA Partner Connect that explain how the software operates. Schools using third-party software should consult the vendor's reference materials for technical guidance.

Program and systems information on the Knowledge Center

Knowledge Center's Software & Other Tools

Software:

- EDconnect
- EDExpress for Windows (including Direct Loan Tools)

Technical References and User Guides for:

- FPS (FAFSA Specifications Guide, ISIR guide, etc.)
- Federal Registers
- Electronic Announcements
- Dear Colleague Letters
- FSA Assessments

FSA Fundamentals

FSA Fundamentals, a self-paced, comprehensive online guide to the *Title IV* programs, has been updated for domestic schools. For more information, see:

Training Workshops – 2023-24 Fundamentals Training Series | Knowledge Center

Sunset of COVID-19 Guidance and Waivers

After the President's declaration of a national health emergency on March 13, 2020, the Department provided a variety of special guidance and regulatory flexibilities under the CARES Act and the HEROES Act. In addition, Congress passed legislation offering relief from certain statutory requirements related to the *Title IV*, HEA programs.

Although COVID-19 continues to affect the lives of many Americans, the urgent need for waivers and flexibilities has diminished. The COVID-19 national emergency ended on April 10, 2023, through enactment of Public Law 118-3. The COVID-19 public health emergency ended on May 11, 2023. These actions triggered the sunsetting of many waivers and flexibilities for the *Title IV* programs.

For more details, see the Electronic Announcement [GENERAL-23-46 of June 14, 2023](#).

Recent Changes

Throughout this volume, we have added and updated links for easy access to regulations and other supporting guidance.

Here are some of the other significant changes to Volume 1 for 2024-2025:

Chapter 1:

- Updated guidance on checking the validity of a high school diploma
- Updated requirements for Eligible Career Pathway Programs
- New Pell Enrollment Intensity measure and how to calculate it described
- Transition from EFC to SAI
- Transition from EFA to OFA
- Updated guidance on Confined or Incarcerated Individuals & Prison Education Programs

Chapter 2:

- New citizenship and eligible noncitizen documents provided and described
- Discussion of USCIS SAVE responses updated

Chapter 3:

- Updated guidance on Total and Permanent Disability discharges
- Incorporated latest information on FAFSA Submission Summary Comment Codes

Chapter 4:

- Revised discussion of how to address situations when there is not a successful match on name or date of birth
- Updated guidance for students/contributors with no Social Security Number

Questions or comments?

We appreciate any comments that you have on Volume 1 of the FSA Handbook. We revise the text based on questions and feedback from the financial aid community, so please reach out to us about how to improve the Handbook at [Contact Customer Support | Help Center (ed.gov)](#), by clicking on "FSA Handbook" in the "topic" dropdown menu.

Chapter 1

School-Determined Requirements

In this chapter, we discuss student eligibility requirements that don't require information from the Department's systems. The school determines on its own whether the student meets these eligibility requirements. In some cases, the financial aid office will need to get information from other school offices, such as the admissions office or the registrar, or from other organizations, such as high schools or testing agencies.

Regular Student in an Eligible Program

A person must be enrolled as a *regular student* in an eligible program to receive Federal Student Aid (FSA) funds (exceptions are discussed later in this chapter). A regular student is someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a degree or certificate offered by the school. The requirements for an eligible program are discussed in *Volume 2, Chapter 2*.

A school must document a student's enrollment in an eligible program at the time of admission, and it must have a system to notify the financial aid office if the student leaves the program. It must also document that an aid recipient is a regular student.

Regular Student (Vo1. 1, Chapter 1, Example 1)

A school allows anyone with a high school diploma or the equivalent to enroll in any course. Many of the school's students do not intend to receive a degree or certificate; they are not regular students. The school requires those who want to receive a degree or certificate to complete a form stating the degree or certificate for which they are studying and to meet periodically with an academic advisor. The school considers them to be regular students.

Conditional acceptance. Some schools admit students conditionally, for example, until they provide further documentation, such as academic transcripts or test scores, or demonstrate an ability to succeed in the program by receiving acceptable grades in program coursework. Typically, the school will limit these students' enrollment in terms of number of courses or enrollment status until they meet the necessary conditions.

Students admitted under such types of conditional acceptance are regular students only if the school officially accepts them into the eligible degree or certificate program. The Department does not define official acceptance or admission. A student who is merely allowed to take some courses before being officially admitted to the program, is not considered a regular student and is not eligible for *Title IV* funds until they are officially admitted.

Conditional Acceptance (Vol. 1, Chapter 1, Example 2-3)

1. A school allows students to take graduate courses before they have taken the GRE, but it limits them to no more than three courses and does not admit them into its graduate programs until they have submitted acceptable GRE scores. They aren't regular students, and because the school hasn't admitted them, they aren't eligible for *Title IV* funds.

2. When a school accepts students into its graduate programs, it requires that the students receive no grade lower than a "B" in the first three courses. During this time, the school considers students to be admitted into the program, so they are eligible for *Title IV* aid. If, however, students receive a grade lower than a B in any of the first three classes, their admittance will be withdrawn and they then will be ineligible for further *Title IV* funds.

Schools may offer a trial or conditional period during which a student attends a program without incurring program charges or receiving *Title IV* funds. There are no restrictions as to program type (undergraduate vs. graduate level, program structure or academic level, etc.) for such students. If the student continues beyond the trial period and enrolls as a regular student, the school can pay the student FSA grants for the entire payment period and loans for the period of enrollment. See [Dear Colleague Letter GEN-11-12](#) for more information.

Regular Students

HEA Sec. 101(a)(1), (b)(2)(A)

HEA Sec. 484(a)(1), (b)(3), (4)

[34 CFR 668.32(a)(1)](#)

[34 CFR 600.2](#)

Continuing Education

Regular students may receive aid for classes they take in a school's continuing education department as long as the classes apply to their degree or certificate program.

Continuing Education (Vol. 1, Chapter 1, Example 4-5)

A school has a continuing education department that offers many online courses that students enrolled in other programs at the school may take and that apply to the degree or certificate program in which the students are enrolled as regular students.

Another school has a continuing education department that offers many courses. Some students enroll in these courses without being admitted to the university. These students are not regular students and are not eligible for _Title IV_ funds.

Remedial Coursework

Remedial coursework prepares a student for study at the postsecondary level in general (as opposed to preparatory coursework, which prepares a student for a given specific eligible program, see below). A student enrolled solely in a remedial program is not considered to be in an eligible program. If acceptance into an eligible program is contingent on completing remedial work, a student cannot be considered enrolled in that program until they complete the remedial work.

However, if the student is admitted into an eligible program and takes remedial coursework within that program, they can be considered a regular student, even if they are taking all remedial courses before taking any regular courses. You may count up to one academic year's worth of remedial courses in the student's enrollment status for _Title IV_ funds. For the purpose of this limit, that is 30 semester or trimester hours, 45 quarter hours, or 900 clock hours. If the remedial classes are noncredit or reduced credit, you must determine how many credit hours they are worth to count toward the student's enrollment status (see "Enrollment Status" section in this chapter).

A remedial course cannot be below the educational level needed for a student to successfully pursue their program after one year in that course. Also, remedial courses must be at least at the high school level, as determined by the institution (i.e. your school), its state legal authority, its accrediting agency, or the state agency recognized for approving public postsecondary vocational education. If any of those parties determine that a remedial class is below the secondary level, the school must abide by that determination, and the class cannot be included for FSA purposes. Additionally, _Title IV_ funds cannot be used for any remedial course that uses direct assessment of student learning instead of credit or clock hours.

You cannot use non-credit remedial hours to determine a student's enrollment status if the course is part of a program that leads to a high school diploma or its recognized equivalent. A student is never permitted to receive funds for training or for coursework prior to the completion of high school, even if the high school equivalency training is offered at postsecondary schools or is required for the postsecondary program.

Similar to other remedial coursework, a student may receive Title IV funds for English as a second language (ESL) courses that are part of a larger eligible program. There are two differences though:

1. ESL courses don't count against the one-year limitation on remedial coursework, and

2. They need not be at the secondary school level.

If your school permits a student to enroll in ESL or other remedial courses that don't apply to the student's degree or certificate, be aware that awarding Direct Loans or Pell Grants over a series of semesters for such work can exhaust the student's eligibility for Pell Grants and/or Direct Loans before they complete their program.

Prerequisite courses that do not advance a student toward the completion of a program or fall into the category of preparatory coursework could be considered remedial coursework under 34 CFR 668.20, as such courses meet the definition of coursework which is "designed to increase the ability of a student to pursue a course of study leading to a certificate or degree" and which either leads to reduced credit, or is one for which "no credit is given toward a certificate or degree."

A prerequisite is a course a student must complete before taking a course that is a required part of the student's program of study. The same limitations that apply to all remedial coursework would also apply to such prerequisite courses, including that a school may not provide aid for more than 30 semester or 45 quarter hours of coursework in a single program.

Remedial coursework

34 CFR 668.20

Preparatory Coursework

A student not enrolled in a degree or certificate program is eligible for Direct Subsidized/Unsubsidized Loans (and a parent may receive Direct PLUS Loans on behalf of a dependent student) for up to one consecutive 12-month period if the student is taking coursework which is **not** necessary for enrollment at the postsecondary level generally, but **is** necessary for enrollment in a specific eligible program.

Teacher Certification Coursework

A student may receive Federal Work-Study (FWS), as well as Direct Subsidized/Unsubsidized Loans (and a parent may receive Direct PLUS Loans on behalf of a dependent student) if they are enrolled at least half time in required teacher certification coursework, even if it does not lead to a degree or certificate awarded by the school. For more details on Direct Loan eligibility criteria, see *Volume 8*.

To qualify, the coursework must be required for elementary or secondary teacher certification, or recertification, in the state where the student plans to teach and must be offered in credit or clock hours. Courses using direct assessment in lieu of credit or clock hours are not eligible. Optional courses that the student elects to take for professional recognition or advancement, and courses recommended by your school but not required for certification, do not qualify. You should document that the courses are required by the state for teacher certification.

A student with a bachelor's degree who is enrolled in a post baccalaureate teacher certification program can receive a Pell Grant or TEACH Grant in limited situations. See *Volumes 7* and *Volume 9* for more details.

Teacher certification coursework

34 CFR 668.32(a)(1)(iii)

DCL GEN-16-10

HEA Sec. 484(b)(4)

Undergraduate and Graduate or Professional Student Definition

The regulations ([34 CFR 668.2](#)) define "undergraduate student," in part, as a student "who is enrolled in an undergraduate course of study that usually does not exceed four years, or is enrolled in a longer program designed to lead to a degree at the baccalaureate level." They further specify that for purposes of dual degree programs (see below), a student is considered to be an undergraduate for at least the first three years of the program.

The regulations define a graduate or professional student as a student who is enrolled in a program or course above the baccalaureate level or in a professional program and has completed the equivalent of three academic years of full-time study, either prior to entering the program or as part of the program itself. Also, a student who is receiving *Title IV* aid as an undergraduate student cannot be considered a graduate/professional student for that same period of enrollment.

To satisfy the requirement that a graduate or professional student has completed three academic years of full-time study, a student must have successfully completed a minimum of at least 72 credit/semester hours, or the equivalent number of quarter hours (at least 108). You may also assign a higher number of credits required to satisfy the credit requirement component to be considered a graduate or professional student at your school, for example, 90 credit/semester hours (which may match your school's grade level progression standard for Direct Loans). Note that these three academic years worth of credits may be taken over a longer or shorter period of time than three calendar years in the program.

Some programs combine undergraduate and graduate study and allow a student to complete both a bachelor's degree and a graduate or professional degree within the same program. These are referred to as "dual degree programs." For instance, a school could offer a 5-year dual degree program leading to both a bachelor's degree and a graduate or professional degree, and could define the first three or four years of study as being at the undergraduate level, and the remaining year(s) of study as being at the graduate or professional level. A student may receive *Title IV* aid at the undergraduate level during the undergraduate portion of such a program.

Other programs lead **only** to a graduate or professional degree, but may admit students who do not yet meet the regulatory requirements to be considered graduate or professional degree students. A student who is enrolled in this type of program, but who does not yet qualify as a graduate or professional student per our definition, is not considered to be enrolled in an undergraduate program of study. Therefore, such a student **is ineligible to receive any type of *Title IV* aid** until they have completed at least three years of full-time study, which may be part of the graduate or professional degree program. Once the student has completed at least three years of full-time study, they are eligible to receive graduate-level Title IV aid.

For more detail, see [34 CFR 668.2(b)](#).

Students with Intellectual Disabilities

Students with an intellectual disability (see definition below) can receive funds from the Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), and Federal Work-Study (FWS) programs. They must be enrolled or accepted for enrollment in a comprehensive transition and postsecondary (CTP) program for students with intellectual disabilities (as defined in [34 CFR 668.231](#); the requirements for establishing a CTP program are described in *Volume 2*). They must also maintain satisfactory academic progress (SAP) as determined by the school for this program. A school may develop a separate SAP policy for CTP students; this program must still contain all of the required SAP elements, see the SAP section later in this chapter. Additionally, these students

- do not have to be enrolled for the purpose of obtaining a degree or certificate, and
- are not required to have a high school diploma or its recognized equivalent.

Students who meet both of the following conditions may be considered students with intellectual disabilities for *Title IV* purposes if they

- have a cognitive impairment characterized by significant limitations in intellectual and cognitive functioning and adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and

- are currently, or were formerly, eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA), including students who were determined eligible for special education or related services under the IDEA but were homeschooled or attended private school.

Except for the provisions governing need analysis, the Secretary has the authority to waive any Pell Grant, FSEOG, FWS, or institutional eligibility provisions necessary to ensure that programs enrolling students with intellectual disabilities are eligible for these three types of federal student aid and that eligible students receive those funds.

Students with intellectual disabilities

HEA Sec. 484(g), HEA Sec. 767, 34 CFR 668.230–233, 20 U.S.C. 1401

Individuals with Disabilities Education Act (IDEA)

Elementary or Secondary Enrollment

A student enrolled in elementary or secondary school is not eligible for aid from the FSA programs, even if they are simultaneously enrolled in an eligible college program. A student is considered to be enrolled in secondary school if they are pursuing a high school diploma or if they have completed the requirements for a diploma, but have not yet received it, and are either taking college coursework for which the student's high school gives credit or the high school still considers the student to be enrolled there.

An adult pursuing a high school equivalency certificate (not a high school diploma) is not considered to be enrolled in secondary school. However, as stated earlier, a student cannot receive *Title IV* for high school equivalency training. However, an adult can take a course offered by a high school, such as a driver's education course, without being considered enrolled there.

Secondary School Enrollment (Volume 1, Chapter 1, Example 6)

A junior in high school enrolls in an electronics technician program at a community college. The student is above the age of compulsory school attendance for the state where the school is located so can be admitted as a regular student. The coursework is offered evenings and weekends, so they can still attend high school classes. The electronics technician program is an eligible postsecondary program, and the student will receive a certificate from the community college upon completion of the program. However, the student is not eligible for *Title IV* aid because they are still enrolled in high school.

Elementary/secondary enrollment

HEA Sec. 484(a)(1), 34 CFR 668.32(b)

Academic Qualifications

To receive *Title IV* funds, students must be qualified to study at the postsecondary level, if they

- have a high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma);
- have the recognized equivalent of a high school diploma, such as a general educational development (GED) certificate or other state sanctioned test or diploma-equivalency certificate;
- have completed homeschooling at the secondary level as defined by state law;

- have completed secondary school education in a homeschool setting which qualifies for an exemption from compulsory attendance requirements under state law, if state law does not require a homeschooled student to receive a credential for their education; or
- have completed one of the ability-to-benefit (ATB) alternatives and are either currently enrolled in an eligible career pathway program or first enrolled in an eligible postsecondary program prior to July 1, 2012.

A student may self-certify on the FAFSA form that they have received a high school diploma or high school equivalency certificate or that they have completed secondary school through homeschooling as defined by state law. If a student indicates that they have a diploma or high school equivalency certificate, your school isn't required to ask for a copy (except as noted below), but if your school requires a diploma for admission, then you must rely on that copy of the diploma or high school equivalency certificate and not on the student's certification alone.

Awards submitted to the Common Origination and Disbursement (COD) system for all students require a Student Eligibility Code (previously Ability to Benefit Code) to report how the student (including graduate and professional students) is qualified to study at the postsecondary level (e.g. by obtaining a high school diploma or its recognized equivalent). For more detail on submitting the appropriate Student Eligibility Code, see the COD Technical Reference in the Knowledge Center.

Academic qualifications

HEA Sec. 484(d), 34 CFR 668.32(e), COD Technical Reference

Checking the Validity of a High School Diploma

If your school or the Department has reason to believe that a student's high school diploma is not valid or was not obtained from an entity that provides secondary school education, you must develop and follow adequate procedures to evaluate the validity of the student's high school diploma. To satisfy this requirement, your school's procedures must include:

1. Obtain documentation from the high school that confirms the validity of the high school diploma, including transcripts or other written descriptions of course requirements, or written and signed statements by principals or executive officers at the high school attesting to the rigor and quality of the coursework at the high school;

2. If the high school is regulated or overseen by a state agency, Tribal agency, or Bureau of Indian Education, confirming with or receiving documentation from that agency that the high school is recognized or meets requirements established by that agency; and

3. If the Secretary has published a list of high schools that issue invalid high school diplomas, confirming that the high school does not appear on that list.

A high school diploma is not valid if it:

1. Did not meet the applicable requirements established by the appropriate state agency, Tribal Agency, or Bureau of Indian Education in the state where the high school is located;

2. Has been determined to be invalid by the Department, the appropriate state agency in the state where the high school was located, or through a court proceeding; or

3. Was obtained from an entity that requires little or no secondary instruction or coursework to obtain a high school diploma, including through a test that does not meet the requirements for a recognized equivalent of a high school diploma under 34 CFR 600.2.

Students who indicate on their FAFSA form that they graduated high school must give the name, city, and state of the high school. The FAFSA form on the Web will not allow students to skip these items, and it will have a drop-down list of

both public and private high schools populated by the National Center for Education Statistics (NCES). Inclusion on the list does not mean that a diploma from the school is valid, nor does exclusion from the list mean that the diploma is invalid. Acceptable documentation for checking the validity of a student's high school diploma is listed above.

A student's self-certification is not sufficient to validate a high school diploma that is in question. If there is conflicting information between the student's certification on the FAFSA form and other documentation or information obtained from the student, the institution must resolve this conflict. For an institution to be a *Title IV* eligible institution, it must admit as regular students only those with a high school diploma or the recognized equivalent, and/or those who are beyond the age of compulsory school attendance in the state where the institution is located. As in other areas of FSA administration, schools have final authority in meeting this requirement. The Department does not plan to have an appeal process or to intervene in reasonable determinations made by school administrators, such as a decision to move a high school from a college's acceptable to unacceptable list or a case where one school has different lists than another.

Checking the validity of high school completion

[34 CFR 668.16(p)](34 CFR 668.16(p))

Foreign High School Diplomas

High school diplomas or transcripts from other countries are acceptable toward the student eligibility general requirement, as long as the diploma is equivalent to a U.S. high school diploma. For students who completed their secondary schooling outside the United States, comparable documents can help, as can the services of companies that determine the validity of foreign secondary school credentials.

A school that is qualified to evaluate the credential may do so. A school that is not qualified or chooses not to evaluate the credential can instead require students to have their credential evaluated by a company that offers such a service. The school may pay for the evaluation, but if it does so, it can only have students reimburse it for the cost if it requires the evaluation as part of its admission process for all students who have a foreign credential.

You may not require only students who are applying for federal student aid to pay the school to have their credential evaluated because that would amount to the school charging a fee to complete the FAFSA form, which is prohibited under [HEA 483(d)(3)](HEA 483(d)(3)). In such cases, because the cost of evaluating a foreign credential is incurred as a charge of admission prior to enrollment in an eligible program, it cannot be included in students' cost of attendance (COA).

You may accept self-certification that a student has completed a foreign high school (or equivalent) education if it is impossible for a refugee, asylee, or victim of human trafficking to obtain documentation of their completion of a secondary school education in a foreign country.

In this case, the applicant must

- present their entry status documentation that demonstrates their current or prior status as a refugee, asylee, or victim of human trafficking who entered the U.S. after the age of 15; and
- provide proof of their attempt to obtain documentation of their completion of a secondary school education in a foreign country, i.e. a copy of an e-mail or letter (including proof of mailing) (see item FHD-Q2/ A2 at www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html).

Recognized Equivalents of a High School Diploma

The Department recognizes several equivalents to a high school diploma:

- A GED certificate.
- A certificate or other official completion documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test

(HiSET), or, in California, the California High School Proficiency Exam) that the state recognizes as the equivalent of a high school diploma (certificates of attendance and/or completion are not included in this qualifying category).

- An associate's degree.
- The successful completion of at least 60 semester or trimester credit hours or 72 quarter credit hours that does not result in the awarding of an associate's degree, but that is acceptable for full credit toward a bachelor's degree at any institution.
- Enrollment in a bachelor's degree program where at least 60 semester or trimester credit hours or 72 quarter credit hours have been successfully completed, including credit hours transferred into the bachelor's degree program.
- A high school transcript for a student who enrolls without completing high school. The transcript must indicate the student has excelled in high school. The student must no longer be enrolled in high school, must satisfy your school's written policy for admitting such students, and must be starting a program that leads at least to an associate's degree or its equivalent.

Note that merely possessing a certificate of attendance and/or high school completion is **not** sufficient for a student to be eligible for *Title IV* aid. Such a certificate may be issued without a student having completed all of the academic graduation requirements, including passing any required examinations. A state must consider a certificate or high-school-completion-equivalency test as equivalent to a high school diploma in that state in order for it to be considered equivalent to a high school diploma for *Title IV* aid eligibility purposes.

High School Documentation Not Yet Received (Vol. 1, Ch 1, Example 7)

A student enrolls in the bachelor's degree program at a university. The student completes their high school requirements early, but the high school does not formally issue the high school diploma until a later time. The university can award the student *Title IV* funds if it obtains a statement signed by an official from the high school attesting that the student has completed all of the required coursework and has successfully passed any required proficiency examinations for the high school diploma. The statement must include the date when the actual high school diploma will be issued. For more detail, see [34 CFR 600.2](#), and *[https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html](#)*.

When a Student Gives Conflicting Statements Regarding Diploma Status

When a student gives conflicting statements regarding their diploma status, for example, stating one year that they had a high school diploma, and in a subsequent year either notifying you that the previous submission was a mistake, or simply answering "no" to the high school diploma question, then the student was ineligible for all *Title IV* aid in the prior award year, and is ineligible for all *Title IV* aid going forward. Before removing all aid, you should verify their answer.

In this case, the student is responsible for any overpayment they received when ineligible, including aid received for completed award years. You (the school) must communicate to the student that they have the responsibility for repaying the overpayment(s). You may also be required to report the overpayment to the National Student Loan Data System (NSLDS) ; for more details, see *Volume 4, Chapter 3*. You may refer the case to the Department for collection if the student does not repay the overpayment(s). See *Volume 4, Chapter 3* for a sample report form.

Homeschooling

Though homeschooled students are not considered to have a high school diploma or equivalent, they are eligible to receive *Title IV* funds if their secondary school education was in a homeschool that state law treats as a home or private school (see [https://hslda.org/legal](#) for requirements for each state).

Some states issue a secondary school completion credential to homeschoolers. If this is the case in the state where the student was homeschooled and the state requires receipt of the credential, the student must obtain it to be eligible for *Title IV* funds . You may rely on a homeschooled student's self-certification that they completed secondary school in a homeschool setting. The student can include in their homeschooling self-certification that they received this state credential.

An eligible *institution* is defined in part as one that admits as regular students only those who have a high school diploma or equivalent, are beyond the compulsory age of attendance for the school's state, or are dually enrolled at the college and a secondary school. For students who finish homeschooling at a younger age, the Department considers them to be

beyond the age of compulsory attendance if

- your school's state would not require them to obtain a secondary completion credential as provided under state law; or
- the student has completed a secondary school education in a homeschool setting that qualifies as an exemption from compulsory attendance under state law.

See also *Volume 2*, Chapter 1.

Homeschooled students and institutional eligibility

HEA Sec. 102(a)(b)(c)

Homeschooled students

HEA Sec. 484(d)(1)(B), 34 CFR 668.32(e)(4)

State regulations (for home-schooling and other purposes)

www2.ed.gov/admins/comm/choice/regprivschl/index.html

Ability-To-Benefit (ATB) Alternatives

Students may become eligible for Title IV aid through the ATB alternatives in one of two ways:

1. If a student first enrolled in an eligible postsecondary program **prior to July 1, 2012** (regardless of receipt of any *Title IV* aid), the student may enroll in any eligible program and can become eligible through one of the ATB alternatives.

2. If a student first enrolled in an eligible postsecondary program **on or after July 1, 2012**, the student may only become eligible through one of the ATB alternatives if the student is enrolled in an "eligible career pathway program". See below for more details about eligible career pathway programs.

An ATB student need not be enrolled concurrently in both the eligible postsecondary program and the component for attaining a high school diploma or its recognized equivalent.

The ATB alternatives include:

- Passing an independently-administered ATB test approved by the Department (see chart at the end of this section).
- Completing at least six credit hours, or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution. Neither remedial nor developmental coursework may count toward this requirement. The coursework must demonstrate that the student has the ability to benefit from the postsecondary program in which the student is enrolled – or intends to enroll – but need not be applicable to the specific degree or program in which the student is enrolled.
- Completing a state process approved by the Secretary of Education. Note: To date, state processes have been

approved by the Secretary for the states of Illinois, Iowa, Minnesota, Mississippi, Washington, and Wisconsin.

Eligible Career Pathway Programs (ECPP)

An Eligible Career Pathway Program is a program that combines rigorous and high-quality education, training, and other services that:

1. align with the skill needs of industries in the economy of the state or regional economy involved;

2. prepare an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the "National Apprenticeship Act"; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);

3. include counseling to support an individual in achieving the individual's education and career goals;

4. include, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

5. organize education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;

6. enable an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and

7. help an individual enter or advance within a specific occupation or occupational cluster.

Under the regulations effective July 1, 2024, schools will need to demonstrate that the ECPP meets the documentation standards outlined in 34 CFR 668.157(b). A school that does not yet offer an ECPP will need to have the first ECPP it offers approved by the Department before offering any other ECPP. A school that already offers an ECPP will need to have one of its ECPPs approved by the Department. All schools will need to also attest that all of the ECPPs they offer beyond the ECPP approved by the Department meet the documentation standards outlined in regulation.

The Department will release guidance prior to July 1, 2024 with more details and will update the FSA Handbook with more information after the release of that guidance.

Additional information regarding the requirements for ECPPs can be found in [Dear Colleague Letter GEN-16-09](#) and in the regulations of 34 CFR 668.2(b) (definition of ECPPs) and 34 CFR 668.157 (documenting student participation in ECPPs).

Eligibility of Other Students Without a High School Diploma (Grandfathered Students)

As discussed in [Dear Colleague Letter GEN-12-09](#), students who were enrolled in an eligible program of study prior to July 1, 2012 may continue to establish *Title IV* eligibility in any eligible program under one of the ATB alternatives by using the following grandfathering test:

1. **Question 1:** Did the student attend an eligible program at any *Title IV* institution prior to July 1, 2012? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for *Title IV* funds. If no, continue to Question 2.

2. **Question 2:** Did the student, prior to July 1, 2012, officially register at a *Title IV* institution, and was the student scheduled to attend an eligible program? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for *Title IV*, HEA student assistance. If no, the student may not use the ATB alternatives to become eligible for *Title IV*, HEA student assistance, unless the student is enrolled in an eligible career pathway program.

For a student who qualifies to use one of the ATB alternatives through enrollment in an eligible program prior to July 1, 2012, you must document that the student successfully completed one of the approved ATB alternatives described above. Such documentation could include documentation from NSLDS that shows a student's prior receipt of *Title IV* funds, or a transcript or other receipt that demonstrates enrollment in an eligible program.

ATB and ECPP Eligibility Timing

When a student becomes eligible through enrollment in an ECPP or by completing at least 6 credit hours or 225 clock-hours that are applicable to a degree or certificate offered by your school, as an ATB alternative, the student does not gain eligibility during the period in which they are completing those hours. The student only becomes eligible for Pell Grants and Campus-Based aid in payment periods following the period in which the hours were completed, and a school may only originate a Direct Loan for a period which follows the period in which the hours were completed.

Ceasing to Be an ATB Student

A student who gained *Title IV* eligibility under one of the ATB alternatives ceases to be an ATB student when they obtain a high school diploma or its recognized equivalent. At that point, the student is no longer subject to the restrictions on ATB students, including that the student be enrolled in an ECPP in order to be (potentially) *Title IV*-eligible.

ATB options & Eligible Career Pathway Programs

ATB Options: [34 CFR 668.32(e)](2,3,5)

Eligible Career Pathway Programs: [DCL GEN-16-09](),

Consolidated Appropriations Act of 2016 (Public Law 114-113), HEA Sec. 484(d)

Workforce Innovation and Opportunity Act (29 U.S.C. 3102(7))

ATB tests

[34 CFR Part 668 Subpart J]() (Sections 141–156)

[11/09/20 Federal Register]()

[DCL GEN-12-09]()

Approved ATB Tests

Approved ATB Tests	Publishers & Passing Scores
Combined English Language Skills Assessment (CELSA), Forms 1 and 2.	Association of Classroom Teacher Testers (ACTT), 1187 Coast Village Road, Suite 1, 378 Montecito, CA 93108 Contact: Pablo Buckelew, 805-965-5704 Passing Scores: CELSA Form 1: 97, Form 2: 97.
ACCUPLACER Computer-adaptive tests and Companion ACCUPLACER Forms J & K: Reading, Writing, Arithmetic	College Board, 250 Vesey Street, New York, NY 10281 Contact: The ACCUPLACER Program, 800-607-5223 Passing Scores: Reading 233, Writing 235, and Arithmetic 230.
Texas Success Initiative (TSI) Assessment Computer-adaptive tests and COMPANION TSI Forms T and V:	College Board, 250 Vesey Street, New York, NY 10281 Contact: The TSI Assessment, 800-607-5223 Passing Scores:

To refer to ATB tests which were approved in the past, see the [June 24, 2015 Electronic Announcement](#) on FSA Partner Connect.

Satisfactory Academic Progress (SAP)

To be eligible for *Title IV* funds, a student must make satisfactory academic progress, and your school must have a reasonable policy for monitoring that progress. The Department considers a satisfactory academic progress policy to be reasonable if it meets both the qualitative and quantitative criteria explained in this section.

Your SAP policy must be at least as strict as your SAP policy for students enrolled in the same program of study who are not receiving *Title IV* funds at your school in terms of the qualitative and quantitative standards discussed below, not the frequency with which these are checked. A school may create different SAP policies for different categories or groups of students, e.g. full-time vs. part-time, undergraduate vs. graduate students, and students enrolled in different academic programs, however those policies must apply equally to all students within each category.

You may use standard rounding rules on any SAP measurements for both qualitative and quantitative components such as rounding up X.5 and higher and rounding down if below X.5. If you choose to round any SAP measurements, your policy for doing so must be included in your school's general SAP policy. A student is either making SAP for all *Title IV* programs, or is not. You cannot say a student is making SAP for Pell Grants but not for Direct Loans.

Your SAP policy or policies must include an academic progress evaluation at the end of each payment period for students in programs lasting one year or less. For all other programs, the policy must include annual reviews which must correspond with the end of a payment period. For programs greater than one year, your policy may also call for progress reviews after each payment period. If you review at each payment period, you must review SAP after every term, (including any summer terms) the student was enrolled. You may have reasonable rules for students who initially enroll in specific courses but modify that enrollment within a limited time.

Quantitative and Qualitative Standards

Your school's policy must specify that both the **quantitative (pace)** and **qualitative (grade-based)** standards are reviewed at each evaluation point, if required for that program. Nonterm credit, subscription-based, and clock-hour programs are exempt from the quantitative/pace evaluation; see the discussion of the quantitative standard below. Each component **may** include a payment period-based standard but **must** include a cumulative standard. You may review SAP via satisfactory progress checks more frequently, (for example, monthly), but the more frequent reviews are considered informal checks and cannot replace the review that is required to be conducted at the end of the payment period.

Your policy must specify the *qualitative* standard (grade point average or GPA) that a student must have at each evaluation or, if GPA is not an appropriate qualitative measure, a comparable measure against a norm. In addition, the *HEA* requires a specific qualitative review at the end of the student's second academic year. Students enrolled in a program of more than two academic years must have a GPA of at least a "C" or its equivalent or must have an academic standing consistent with your school's graduation requirements.

Having a standing consistent with the requirement for graduation means you could use an escalating GPA instead of a fixed one. For example, if your school uses a 4-point scale, it could require students to have a 2.0 average by graduation but allow their average to be lower earlier in their program. If your policy permits such a progression and a student falls below a C average, you must be able to document that their average is consistent with the academic standard required for graduation.

Remedial coursework **must** be included in the qualitative assessment of SAP. The courses need not be included in the student's GPA; however, your school must have some means of assessing a student's qualitative academic progress in remedial coursework. Similarly, you must have a means of assessing student progress in programs comprised entirely of pass/fail coursework.

Courses attempted on a pass/fail basis count as attempts for SAP purposes (see the guidance below on pace) but are not

factored into a student's GPA for SAP purposes. When there are just a few pass/fail courses in the overall program, such courses do not have to be included in the qualitative/grades SAP component as long as they are counted in the quantitative/pace component. However, a program comprised primarily or 100% of pass/fail coursework must be counted in both qualitative and quantitative components.

Your SAP policy must also specify the quantitative standard (pace) at which students must progress through their program to ensure that they will graduate within the maximum timeframe (see below for full definition of maximum timeframe), and each satisfactory progress check must measure this. Nonterm credit, subscription-based, and clock-hour programs are now exempt from the quantitative/pace evaluation. For these exempt programs, your school may, at its option, include the exempt programs/credits in an SAP calculation for the quantitative component of SAP.

For credit-hour programs using standard or nonstandard terms that are not subscription-based programs, you calculate the pace at which a student is progressing with one of two methods:

- by dividing the total number of hours the student has successfully completed by the total number they have attempted; or
- by determining the number of hours that the student should have completed by the evaluation point in order to complete the program within the maximum timeframe.

You may include, but aren't required to include, remedial courses when making the assessment of the quantitative component of SAP.

As noted above, subscription-based programs are exempt from including a quantitative component as part of SAP. However, a student enrolled in a subscription-based program must meet certain coursework completion requirements to receive a disbursement of *Title IV* funds. For more detail on the coursework completion requirements to receive disbursements in subscription-based programs, see *Volume 3*, Chapter 1, and Appendix B.

Until the end of the payment period which includes May 11, 2023, you may exclude from the SAP quantitative calculations any credits a student attempted, but could not complete due to the COVID-19 national emergency. Because different programs at your school may have different payment periods, this provision may sunset at different times for different programs. It is not necessary for a student to have filed a SAP appeal for a school to exercise this flexibility, but you must have reasonably determined that the student's failure to complete those credits was the result of a COVID-19 related circumstance. Allowable circumstances include, but are not limited to:

- illness of the student or family member;
- need to become a caregiver or first responder;
- economic hardship;
- added work hours;
- loss of childcare;
- inability to continue with classes via distance education; and
- inability to access wi-fi due to closed facilities.

Beginning with the following payment period, you must include all normal quantitative elements required by standard SAP requirements in your SAP calculations.

Checking a student's pace of completion allows for variations of enrollment status since you look at the percentage of classes successfully completed rather than a timeframe in which courses are taken. Also, you can use a graduated completion percentage for each year of a program. For instance, your policy can permit students to complete a lower percentage of their classes in the first academic year but require them to complete an increasing percentage in subsequent years so that they finish their program in time. A student becomes ineligible (via the maximum timeframe element) at the point at which it becomes mathematically impossible for them to complete the program within 150% of its length if it is an undergraduate program, or within the maximum timeframe established by the school if it is a graduate program (for more on maximum timeframe, see the maximum timeframe definition below). In this situation, an appeal would be possible if your school allows appeals.

Your policy must explain how GPA and pace of completion are affected by incomplete courses, withdrawals, repetitions, and by transfer credits from other schools. Generally, all periods of the student's enrollment count when assessing progress, even periods in which the student did not receive *Title IV* funds. However, only transfer credits that count

toward the student's current program must be counted as both attempted and completed hours. Credits that are not counted toward the student's program may also be counted, at your school's discretion, as described in your SAP policy. Your policy may permit that for students who change majors, credits and grades that do not count toward the new major will not be included in the satisfactory progress determination. You may limit how many times a student can change majors for the purposes of your SAP policy.

Your SAP policy cannot exclude from the satisfactory progress check courses in which a student remained past the add/drop period and earned a grade of "W" (or its equivalent), nor can it exclude a specific type of hours attempted, such as those taken during a summer session. A review of SAP is not complete until both the qualitative and quantitative measures have been reviewed, if applicable (you may exclude nonterm credit, subscription-based and clock-hour programs from the quantitative/pace evaluation). If a satisfactory progress check shows that a student does not have the required GPA or is not maintaining the required pace, the student becomes ineligible for *Title IV* funds unless your school reviews SAP after every payment period or permits SAP appeals, as explained below.

You may monitor SAP throughout the payment period, for example, at the end of each month, but an official review (i.e., for *Title IV* eligibility purposes) may only occur at the end of a payment period. A monthly evaluation that contains the end of a payment period (such as hour 450) cannot count as the official evaluation for the entire payment period. After an official evaluation, a student not meeting SAP standards must be placed on termination (i.e., immediate loss of *Title IV* eligibility), warning, or probation (if the student submits a successful appeal) status. You may not put a student on warning or probation for less than a payment period.

SAP Matching Progress and Published Length of Program

A school's attendance policy may be stricter than the quantitative standard for SAP. However, if the standards do not match, a student may continue to meet SAP progress requirements for one standard and not for the other, which can result in the student being charged overtime charges due to failing to meet the stricter standard. If, in a program to which these standards apply, a substantial majority of students graduate after the published length of the program while retaining *Title IV* eligibility and incurring overtime charges, the Department would expect the school to revise the published length of the program.

Maximum Timeframe

At each official SAP evaluation point, (at the end of a payment period) you must evaluate whether it is possible for students to complete their program within the maximum timeframe. **Students fail the maximum timeframe measure at the point at which it is determined that it is not possible for them to complete their program within the maximum timeframe, not at the point they actually reach the maximum timeframe.**

For the following program types, the maximum time frame is:

- For an undergraduate program measured in credit hours, a period no longer than 150 percent of the published length of the program, as measured in credit hours, or expressed in calendar time. If your school chooses to use calendar time to measure maximum timeframe, you evaluate a student's pace by determining the number of hours that the student should have completed at the evaluation point in order to complete the program within the maximum timeframe. Measuring credits completed over calendar time may be considered a stricter method of evaluation, as it holds a student to the same pace regardless of the student's enrollment status in any given payment period. Note that evaluating SAP progress via calendar time for credit hour programs is optional; you may still evaluate progress for these programs by measuring credit hours.
- For an undergraduate program measured in clock hours, a period no longer than 150 percent of the published length of the program as measured by the cumulative number of clock hours the student is required to complete and expressed in calendar time. (Note that a student in a clock hour program cannot receive aid for hours beyond those in the program; the maximum timeframe applies to the amount of calendar time the student takes to complete those hours.)
- For a graduate program, a period the school defines that is based on the length of the program. Credit hour graduate programs may also measure maximum timeframes either in credit hours or calendar time.

SAP New and Conflicting Information Requirements

SAP calculations must be performed at established intervals which must coincide with the end of a payment period as prescribed in [34 CFR 668.34(a)(3)](). You are not required to recheck SAP and/or recalculate as the result of grade changes that occur between formal SAP evaluations.

However, a school may have a policy of recalculating to account for subsequent grade changes. If your school has a policy to recalculate, you may make disbursements of *Title IV* aid for which the student becomes eligible as a result of the grade changes. However, there are limitations on when a school can make a disbursement in these circumstances:

- For Pell Grants and TEACH Grants, you may only make a disbursement based on a grade change during the payment period immediately following the SAP evaluation that was affected by the change.
- For all other types of *Title IV* aid, you may only make a disbursement based on a grade change during the academic year in which the SAP evaluation takes place, or, if the evaluation takes place at the end of an academic year, during the academic year following that SAP evaluation.

For example, consider a student who was deemed ineligible for *Title IV* aid in the spring term due to failing an SAP evaluation at the end of the fall. If the school changes the student's grades during the spring term, it could pay the student's Pell Grant or TEACH Grant funds for the spring. However, if the school decided to change the student's grades after the spring term ended, it could not disburse Pell Grants or TEACH Grants to the student for the spring term.

Schools should **not** alter aid already disbursed to students based on SAP evaluations that were accurate at the time they were performed. For example, consider a student who was deemed eligible for *Title IV* aid in the spring term after passing a SAP evaluation that included incomplete classes, but the school changes those incomplete grades to failing grades during the spring term. Had the student failed those courses prior to the SAP evaluation, they would have failed the evaluation and been ineligible for aid during the spring term. However, in this situation, the school should not return the student's *Title IV* aid for the spring term because the student was eligible on the basis of a SAP evaluation that was accurate at the time it was performed.

Whether or not your school has a policy of rechecking SAP between evaluation points, any grade changes must be accounted for in the next scheduled SAP evaluation. Although schools have the option of recalculating SAP due to grade changes, these changes should be a rare occurrence. If changes to student eligibility on the basis of grade changes occur on a regular, consistent basis, the Department may investigate further.

Financial Aid Warning

Financial aid warning is a status a school assigns to a student who is failing to make satisfactory academic progress. The school reinstates eligibility for aid for one payment period and may do so without a student appeal. This status may only be used by schools that check SAP at the end of each payment period and only for students who were making SAP in the prior payment period for which they were enrolled or who were in the first payment period of their program.

A school may use this status without appeal or any other action by the student. Warning status lasts for one payment period only, during which the student may continue to receive *Title IV* funds. Students who fail to make satisfactory progress after the warning period lose their aid eligibility unless they successfully appeal and are placed on probation. Schools do not need to use the warning status; they can instead require students to immediately appeal to be placed on probation.

Appeals, Financial Aid Probation, and Academic Plans

If the school permits appeals, a student who loses *Title IV* eligibility because they failed to make satisfactory progress may appeal that result on the basis of: the student's injury or illness; the death of a relative; or other special circumstances. The appeal is a process by which a student who is not meeting SAP standards petitions the school for reconsideration of their eligibility for *Title IV* funds. The appeal must explain why the student failed to make satisfactory progress and what has changed in their situation that will allow them to make satisfactory progress at the next evaluation.

All schools may use financial aid probation as part of their satisfactory progress policy. Probation is a status a school assigns to a student who is failing to make satisfactory academic progress and who successfully appeals. Eligibility for aid may be reinstated for one payment period. If you determine, based on the appeal, that the student should be able to meet the SAP standards by the end of the subsequent payment period, you may place the student on probation without an academic plan. You must review the student's progress at the end of that one payment period, as probation status is

for one payment period only. If you determine, based on the appeal, that the student will require more than one payment period to meet progress standards, you may place them on probation and develop an academic plan for the student. You must review the student's progress at the end of one payment period as is required of a student on probation status, to determine if the student is meeting the requirements of the academic plan.

If the student is meeting the requirements of the academic plan or the generally applicable SAP requirements which apply to all students, outside of any individualized academic reinstatement plan, the student is eligible to receive *Title IV* aid as long as they continue to meet those requirements and are reviewed according to the requirements specified in the plan.

Your school determines the process and documentation required for an appeal. It may decide to require more extensive information on an initial appeal and some type of an update statement on a subsequent appeal. The regulations do not specify what must be included in an academic plan. The school and the student must develop a plan that ensures that the student is able to meet the school's satisfactory progress standards by a specific time, though an academic plan could instead take the student to successful program completion. Students must also appeal to change their plan. They must explain what has happened to make the change necessary and how they will be able to make academic progress.

Reestablishing Aid Eligibility

Your policy, even if it does not permit appeals, must explain how students who are not making satisfactory academic progress can restore their eligibility for *Title IV* funds. Other than when a student is placed on financial aid warning, probation, or has agreed to an academic plan as outlined above, they can regain eligibility only by taking action that brings them into compliance with your school's satisfactory progress standards. The requirement that a student complete a number of credits or enroll for a number of academic periods without receiving *Title IV* funds, or that they interrupt their attendance for one or more academic periods, may be part of your academic progress policy. However, paying for one's classes without *Title IV* funds or sitting out for a term does not affect a student's academic progress status, so neither is sufficient to reestablish aid eligibility.

Grades and SAP: Academic Amnesty or Renewal

Some schools have academic amnesty or renewal procedures through which a student can apply to have credits attempted and grades earned in previous semesters excluded from the calculation of the student's grade point average. The regulations make no provision for the concept of academic amnesty or academic renewal. Therefore, a school must always include courses applicable to a student's major or program (whenever taken) in evaluating a student's satisfactory academic progress (both quantitative and qualitative components) except as permitted under their SAP policy for handling repeat coursework. However, a student may be able to appeal loss of eligibility due to special circumstances.

SAP for Test-Based Credits

Some schools have developed tests in accord with their academic standards, such as language proficiency tests, which students can receive course credit for taking. Such credits must be counted towards SAP for quantitative/pace purposes, and may, at the school's discretion and according to the school's written policy, be counted towards the student's qualitative/grades SAP measurement.

Satisfactory Academic Progress

HEA Sec. 484(c), 34 CFR 668.16(e), 34 CFR 668.32(f), 34 CFR 668.34

Q&A: *https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/sap.html*

Satisfactory Academic Progress: Four-Year Programs (Vol. 1, Chapter 1, Examples 8-9)

Four-year credit-hour program with appeal
Students in a bachelor's degree program at School A must complete 120 credits and may attempt up to 180 credits (120 x 150%). School A reviews a student's academic progress once per year and has a pace of completion of 2/3 or 66.67% of the classes that students attempt; it requires a cumulative GPA of 1.50 after the first year, 1.75 after the second year, and 2.0 after the third year and beyond.

In their first semester, a student fails one course and withdraws (late in the term) from one of their five courses (15 credits). The student takes four courses in their second semester and again fails one and withdraws from one. Though the student's GPA is 1.71, they aren't making SAP by the end of the first year because they completed only 15 credits out of the 27 they attempted, and two-thirds (2/3) of 27 is 18. The student applies for an appeal, but because their only reason for not making SAP is that they weren't able to concentrate on college after being in high school, and because they don't offer evidence showing what has changed, the aid administrator at School A denies the student's appeal, and the student is ineligible for aid in his second year.

Even if the student had a better reason for failing at SAP, such as being injured and rendered unable to participate effectively in normal activities, the administrator might still have denied their appeal because they saw little improvement or variation in the student's pace of completion and did not determine that they would likely be making SAP a year later. If the student's academic performance improves by the end of his second year so that they are meeting the SAP criteria, he can again receive *Title IV* funds.

4-year credit-hour program with warning and appeal School K checks SAP every quarter, which permits it to use financial aid warnings. Students must complete 144 credit hours to receive a BA or BS degree, and they may attempt up to 216 credit hours to complete a program. Students must complete at least half of the credits they attempt in their first year and 75% of their credits in each year after that. They must have no less than a 2.0 GPA at all times.

A student finishes their first year at School K with a 2.25 GPA and completes all of the credits that they attempt, so they are making SAP. After the first quarter in their second year, the student again completes all of their classes but poor grades leave her with a 1.94 GPA. The aid administrator places the student on financial aid warning for one quarter and informs her that they are not meeting the SAP standards. The student does poorly in the next quarter as well, and the student's GPA drops to 1.85. The aid administrator informs the student that they can't continue on warning status and needs to submit an appeal explaining why she is failing to make SAP and why the administrator thinks that will change and allow the student to again make SAP.

The student brings the administrator an obituary showing that their mother died recently, which required that the student help with family affairs and caused them to lose her focus at school. The student asserts that is over now. The administrator places the student on probation and suggests that the student might take fewer courses. But the student enrolls full time and again receives poor grades, causing their GPA to drop to 1.80. The administrator informs the student that they have become ineligible for *Title IV* funds but that they can become eligible again if the student raises their GPA to 2.0 or that they can submit another appeal (the latter appeal must be based on a reason different from the first appeal) and this time request to be placed on an academic plan.

Satisfactory Academic Progress: One-Year Programs (Volume 1, Chapter 1, Examples 10-11)

1-year credit-hour program with financial aid warning School C has a program that a full-time student can complete in 24 semester hours. Because this is a one-year program, School C must check SAP every payment period. Their policy is that students must complete the program by the time

academic performance until late in (or the end of) the program, Fowler decides not to use warnings. Instead, it requires students to submit an appeal when they are not meeting SAP standards.

After the first four months, a student's GPA is 3.0, but they complete only 250 of the 300 clock hours

they have attempted 36 (150% of 24) hours, and the pace of completion is 2/3 or 66.6 7%. They require a 2.0 GPA at all times.

A student plans to take two classes (eight hours) each semester. In the first term, they fail one class and get a B in the other. The student's GPA is 1.5 and their pace of completion is 50%, so School C automatically places her on financial aid warning and informs the student of this. In the student's second semester, they get a C (in the class she failed in the first semester) and an A, raising their GPA to 2.25 (School C counts all grades for retaken classes), and the student has completed 75% of her classes, so the administrator restores her aid eligibility.

Clock-hour program with appeal School F has a 900-clock-hour program that normally takes eight months to complete. School F allows a maximum timeframe of 12 months to complete the program, and students must complete at least 300 clock hours out of the 450 clock hours of each payment period (four months) and maintain a 2.0 GPA. Because the program is so short and financial aid warnings would delay a rigorous review of students'

that were required for the payment period. School F informs the student that he must submit an appeal to continue to receive *Title IV* funds. The student tells the administrator that they were diagnosed with depression, which prevents the student from doing as much as he'd like. The student provides a note from his psychiatrist and affirms that they are doing better since they have received regular treatment. The administrator grants the student's appeal and puts them on financial aid probation since they determine that the student can finish the program in the remainder of the year. The administrator drafts a plan that allows the student some flexibility in their pace of completion and that requires the student to check with the administrator once a month to inform them of the student's progress in their classes.

After four more months, the student's GPA is 3.3, and they have completed 580 hours out of the 600 required under School F's published SAP policy, which would normally make the student ineligible for *Title IV* funds. But because the student is progressing according to their personal SAP plan and is predicted to complete the program within the maximum timeframe, they may continue to receive aid.

SAP Practices FAQ

Q. If a student fails SAP at the end of a payment period and becomes ineligible for aid in the next payment period, can the school still provide a late disbursement of aid for eligible coursework associated with the previous payment period?
A. Yes, if the student meets all the late disbursement requirements and was in all other ways eligible at the time. SAP is forward looking and impacts student eligibility in subsequent payment periods.

Q. After my school makes an SAP evaluation, can a student be placed on warning or probation status if their appeal is successful for a period that is shorter than a payment period?
A. No. The warning or probation period must last for at least one payment period.

Q. When determining SAP, is it permissible to only include coursework applicable to the student's program in the qualitative calculation, while including all coursework in the quantitative calculation?
A. Normally, coursework assessed must be the same for both qualitative and quantitative measures.

However, in the case of a transfer student, all of a student's credits accepted towards the new program must be counted in the quantitative measurement, but transfer credits are optional in the qualitative measurement. You are not required, for instance, to factor in grades from other institutions into students' GPA at your school.

Q. May we have a policy in our larger SAP policy that when a student changes majors or program, only the credits still applicable to the student's new major count towards SAP?
A. Yes. The treatment of a student who changes majors is determined by the school. You must specify in your SAP policy whether you will include all coursework taken by a student, or only the coursework acceptable towards the degree in which the student is

Enrollment Status

A student must be enrolled at least half time to receive aid from the Direct Subsidized/Unsubsidized and Direct PLUS Loan programs. Pell Grants, TEACH Grants, and Campus-Based Programs don't require half-time enrollment, with two exceptions:

- Students must be enrolled at least half-time in a teaching credential program to be eligible for Federal Work Study (FWS).
- For Pell Grants and FWS, but not TEACH Grants, students must be enrolled at least half-time in a post-baccalaureate program for teacher education.

Students are no longer required to be enrolled at least half-time to be potentially eligible for additional Pell Grant funds in excess of 100 percent of the student's Pell Grant Scheduled Award (also known as Year-Round Pell).

For Pell Grants, enrollment status is referred to as enrollment intensity and is prorated vs. the full-time standard for the student's program. For example, if full-time enrollment for a student's program is 12 hours, and the student is enrolled for seven hours, their enrollment intensity would be 58%. See *Volume 7* for more detail on enrollment intensity for Pell and calculating Pell Grants. Students in nonterm programs are always considered full-time for Pell Grant purposes.

Full-time status - your school defines a full-time workload, but it must meet the minimum standards in the regulations. The regulatory definition of full time for federal student aid can differ from that used for other purposes at your school, such as the definition used by the registrar's office. Your definition of a full-time workload for a program must be used for all students in that program and must be the same for all federal student aid-related purposes, including loan deferments. You can't accommodate a student with a learning disability or other handicap by allowing a full-time enrollment status lower than the minimum standard laid out for *Title IV* eligibility. See the section earlier in the chapter on students with intellectual disabilities for more information. Note that the scope of activity that may be counted for full-time status is broader for students in Comprehensive Transition and Postsecondary (CTP) programs than it is for students in traditional programs.

Half-time status - to be enrolled half time, a student must be taking at least half of the course load of a full-time student. A school may choose to define half-time as half of the minimum full-time regulatory standard even if this is less than half the full-time standard established by the school. For example, if a school sets 14 semester hours as full time, it could use 6 semester hours (one-half of the regulatory full-time minimum of 12) as half time instead of 7.

Minimum Standards for Full-Time Enrollment

A student's workload may include any combination of courses, work, research, or special studies that your school considers sufficient to classify them as full time. This includes, for a term-based program that is not subscription-based, no more than one repetition of a previously passed course that is not due to the student failing other coursework. The regulations specify a minimum standard for undergraduate students but not for graduate students. For undergraduates, full-time status must be at least the following:

- Twelve semester hours or 12 quarter hours per academic term in an educational program using a semester, trimester, or quarter system.
- Twenty-four semester hours or 36 quarter hours per academic year for an educational program using credit hours but not using terms, or the prorated equivalent for a program of less than one academic year; (see example below).
- Twenty-four clock hours per week for an educational program using clockhours.
- A series of courses or seminars equaling 12 semester or quarter-hours over a maximum of 18 weeks.
- For a program that measures credit hours and uses nonstandard terms, the number of weeks of instruction in the term divided by the number of weeks of instruction in the academic year, multiplied by the number of credit hours in the program's academic year.
- The work portion of a cooperative education program in which the amount of work performed is equivalent to the academic workload of a full-time student.

- For correspondence coursework, a courseload commensurate with the full-time definitions listed here, and at least half of that load must be non-correspondence coursework that meets half of the school's requirement for full-time students.
- For subscription-based programs, a full-time course load commensurate with the full-time definitions for standard and nonstandard term programs listed here. For a full discussion of subscription-based programs and terms, see *Volume 3*, Chapter 1.

Full-time attendance (Vol. 1, Chapter 1, Example 12): For the prorated equivalent for a program of less than one academic year, such as in the second bullet above, the objective is to determine if the student is attending at a full-time pace. For an academic year of 24 semester hours and 30 weeks of instructional time in a nonterm setting, full time is determined by taking an average of .8 hours per week (24/30 = .8). If the student is in a 20-semester hour program over 25 weeks, take the number of weeks in the program and multiply by .8. 25 x .8 equals 20 semester hours. Therefore, the student in the 20-hour, 25 week program is attending full-time.

The definition of full-time student, upon which all enrollment statuses are based, is located in 34 CFR 668.2(b). The regulatory definitions of credit-hour, clock hour and academic year are located in *Volume 2*, Chapter 2 (clock hour and credit hour), *Volume 3*, Chapter 1 (academic year), and 34 CFR 600.2.

Your school must have a written policy stating what enrollment status the work portion of a co-op program is equivalent to. If it equals or exceeds a full-time academic load, the co-op student is considered full time regardless of how many credits are earned for the co-op work. A student taking only correspondence courses is never considered to be enrolled more than half time. See *Volume 7* for more on Pell Grant requirements for enrollment intensity and correspondence courses.

Eligibility and Enrollment Status for Retaking Coursework

The regulatory definition for full-time students allows a student in a term-based program only (except for a subscription-based program) to retake any previously passed course a maximum of once per course. For this purpose, "passed" means any grade higher than an "F," regardless of any school or program policy requiring a higher qualitative grade or measure to have been considered to have passed the course. This retaken course may be included in the student's enrollment status and would count toward the student's eligibility for *Title IV* aid.

SAP regulations allow a student to receive Title IV funds for retaking a course they failed. If a student is receiving *Title IV* funds to retake a class they withdrew from before completing, that is not counted as the student's one allowed retake for that course. However, if a student passed a class once; uses *Title IV* funds to retake it and fails the second time, that failure counts as their retake. The student may not receive *Title IV* funds to retake the class a third time.

If your school has a policy that requires students to retake all the coursework for a term in which a student fails a course, only the first retake of any previously passed course is eligible for *Title IV* aid. A student is considered withdrawn for *Title IV* purposes if they withdraw from all *Title IV* eligible courses in the payment period or period of enrollment and continue to attend only a course or courses that are not eligible for *Title IV* aid. This is because a student is considered to be attending a *Title IV* eligible program only if they are attending one or more courses in that program for which they are receiving *Title IV* funds.

If a student who received an incomplete in a course in the prior term is completing the coursework in the subsequent term to erase the incomplete in the prior term, the student is not considered to be enrolled in the course for the subsequent term. Therefore, the hours in the course do not count toward the student's enrollment status for the subsequent term, and the student may not receive *Title IV* funds for completing the course. However, if a student who received an incomplete in a course in the prior term is retaking the entire course for credit in the subsequent term, the hours in the course count toward the student's enrollment status, and the student may receive *Title IV* funds for retaking the course.

In any case, remember that retaken classes may count against SAP, and the student's eligibility is still constrained by all SAP requirements, as discussed earlier in this chapter. Also, the one-year academic limitation on noncredit and reduced credit remedial coursework still applies. So, for example, a student repeating a remedial course that exceeds the one-year limitation could not have the class included in his or her enrollment status.

Retaking coursework and remedial coursework provisions

School Policy and Operations for Retaking Coursework

Your school may establish a policy that permits or bars a student from retaking previously passed coursework for reasons such as improving their grade point average. All applicable guidance in the FSA Handbook and regulations must be used to determine how to award *Title IV* aid in these situations.

You may wish to consult with your school's registrar to ensure that your school's class repetition policy is properly coordinated and implemented by both offices, including any changes that need to be made to the registrar's policies and operations for enrolling students or reporting enrollment to NSLDS.

Retaking Coursework FAQs:

https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/course.html

Repeating After Non-Term Credit-Hour or Clock-Hour Program Completion

Any student who successfully completes an entire nonterm credit-hour or clock-hour program, and later re-enrolls, either to take that same program again or to take another program, may receive *Title IV* funds for repeating coursework regardless of the amount of time between successful completion of the first program and beginning the program or another program again.

Counting Non-Credit or Reduced-Credit Remedial Work in Enrollment Status

A student can receive aid for a limited amount of remedial coursework included as part of a regular program. As long as the student qualifies for aid for remedial courses, you must include the remedial courses in the student's enrollment status.

Some schools give no credit or reduced credit for remedial classes. To determine enrollment status, credit hours for the remedial class should be the same as for the comparable full-credit class. If you're using credit hours, you can compare the number of classroom and homework hours of study that the remedial course requires with the hours required for similar courses offered for full credit. Clock-hour schools should use the number of classroom hours attended in the remedial program. For more details, see 34 CFR 668.20.

Enrollment Status for Students with Intellectual Disabilities

Because a comprehensive transition and postsecondary program for students with intellectual disabilities can include work for which the school awards no credit, such as audited courses, the school must develop equivalencies in credit hours for such work, just as it must do with non-credit remedial coursework. This will allow the school to determine the enrollment status for students in these programs.

Restriction on Coursework Learning Which is not *Title IV*-Eligible

Courses that do not count toward a student's degree, certificate, or other recognized credential cannot count toward enrollment status unless they are eligible remedial courses. **This means you cannot award *Title IV* aid for classes**

that do not count toward a student's degree, certificate, or credential.

Similarly, a student who completes the academic requirements for a program but does not yet have the degree or certificate may not receive additional *Title IV* funds for that program.

Finally, federal student aid can be awarded only for learning that results from instruction provided or overseen by the school. It cannot be awarded for any portion of a program based on study or life experience prior to enrollment in the program or based on tests of learning that are not associated with educational activities overseen by the school.

Full-time student definition

[34 CFR 668.2(b)](#)

Half-time enrollment

HEA Sec. 428(b)(1)(A), [34 CFR 668.2(b)](#)

Transition from EFC to SAI

To be eligible for certain types of *Title IV* aid, students must have an eligible Student Aid Index or "SAI." Beginning in the 2024-25 award year, The *FAFSA Simplification Act* replaces the Expected Family Contribution (EFC), with the SAI. You will see the SAI displayed on the output documents that result from the processing of the FAFSA form—the FAFSA Submission Summary, which replaces the Student Aid Report (SAR), and Institutional Student Information Record (ISIR).

Like the EFC, the SAI is an evaluation of the financial resources that may be available to contribute toward a student's education expenses. The EFC was calculated according to a formula specified in the law, and the SAI is likewise calculated according to formulas laid out in the *FAFSA Simplification Act*. These formulas use information that applicants provide on their FAFSA form, and, in most cases, federal tax information (FTI) that is retrieved directly from the IRS.

A few of the most significant differences between the SAI and EFC include

- the removal of the number of family members in college from the eligibility calculation;
- the possibility for the SAI to be a negative number, going as low as negative 1,500 (in contrast to the previous limit of zero for EFC);
- the elimination of alternate EFCs for enrollment for a period other than nine months;
- the elimination of the existing simplified needs test and auto-zero EFC calculations. Note that some applicants will still qualify for a maximum Pell Grant based on similar new criteria;
- the income and asset components, as well as the allowances against those components, used in the SAI calculation have been updated significantly; and
- the implementation of separate Pell Grant eligibility criteria means that while the SAI may contribute to determining a student's Pell Grant eligibility, it is no longer the sole determining factor.

These and other issues in the calculation and use of the SAI are discussed more fully in the [2024-25 Application and Verification Guide](#) and Dear Colleague Letter [GEN-23-11](#).

Transition from EFA to OFA

In order to be eligible for need-based *Title IV* aid, a school must determine that a student has financial need. Beginning in the 2024-25 award year, the *FAFSA Simplification Act* replaces the term "Estimated Financial Assistance" (EFA), with

"Other Financial Assistance," (OFA). Similar to EFA, OFA refers to the scholarships, grants, loans, and other assistance known to your school at the time that the student's aid was packaged.

Historically, EFA was used as part of the formula for calculating need for *Title IV* aid by subtracting it from their cost of attendance. Under the *FAFSA Simplification Act*, the formula for determining a student's need for *Title IV* aid remains the same, except that EFC has been replaced by SAI and EFA has been replaced with OFA:

Need = Cost of Attendance (COA), minus SAI, minus OFA.

There are two forms of funding which are excluded from consideration as OFA:

- Some (but not all) foster care benefits.[*]
- Emergency financial assistance provided to the student for unexpected expenses that are a component of the student's COA and are not otherwise considered when determining the student's need.

[*]Payments made and services provided under Title IV-E of the Social Security Act to a child or youth in foster care, or formerly in foster care are excluded from OFA. This includes the value of a Title IV-E foster care maintenance payment, Educational and Training Vouchers (ETVs), or any other services or assistance provided to the youth under Title IV-E, including the Chafee Foster Care Independence Program for Successful Transition to Adulthood.

For more details on calculating and using OFA, see Dear Colleague Letter GEN-23-11 and the 2024-25 edition of *Volume 3* of the FSA Handbook.

Students Convicted of Possession or Sale of Drugs

The *FAFSA Simplification Act* amended Section 484 of the *Higher Education Act of 1965 (HEA)*, making several important changes to student eligibility criteria. One of these is the elimination of the prohibition on receiving *Title IV* aid for students with most drug-related convictions.

Having a drug conviction while receiving *Title IV* aid no longer impacts a student's *Title IV* aid eligibility, and a student who has a drug conviction may be eligible to receive *Title IV* aid if they meet all other eligibility criteria.

The Department removed the drug convictions questions from the FAFSA form. Students with drug convictions are eligible for *Title IV* aid if they meet all other eligibility requirements, unless they are subject to a federal drug abuse hold on receiving certain federal benefits. The eligibility criterion related to the *Anti-Drug Abuse Act* is unaffected by the removal of the drug conviction question from the FAFSA form. See the drug abuse hold information below.

Drug convictions

HEA Section 484, DCL GEN-21-04

Federal Register Notice June 17, 2021

Drug abuse hold

The *Anti-Drug Abuse Act* of 1988 includes provisions that authorize federal and state judges to deny certain federal benefits, including federal student aid, to persons convicted of drug trafficking or possession. The FAFSA Processing System (FPS) maintains a hold file of individuals who have received such a judgment. All applicants are checked against this file to determine if they should be denied aid. Records matching the drug abuse hold file receive a rejected application (reject 19 and comments 009 or 055 on the FAFSA Submission Summary). See the FAFSA Specifications Guide for more information.

Confined or Incarcerated Individuals and Prison Education Programs

A confined or incarcerated individual is a person serving a criminal sentence in a federal, state, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or similar correctional institution (operated by either the government or a contractor). A juvenile justice facility is a public or private residential facility that is operated primarily for the care and rehabilitation of youth who, under state juvenile justice laws, are accused of committing a delinquent act; have been adjudicated delinquent; or are determined to be in need of supervision. A student is not considered to be incarcerated if they are subject to or serving an involuntary civil commitment, in a half-way house or home detention, or are sentenced to serve only weekends.

The *FAFSA Simplification Act* made many important amendments to the *HEA*. One important amendment was to allow students who are incarcerated in federal or state correctional facilities to access Pell Grants when they enrolled in an eligible prison education program (PEP). As part of implementing this new access to Pell Grants for confined or incarcerated individuals, the Department published a final rule in the *Federal Register* (87 FR 65426) on October 28, 2022, to implement the statutory requirements for confined or incarcerated individuals enrolling in an eligible prison education program (PEP). Beginning on July 1, 2023, a confined or incarcerated individual is eligible to receive a Pell Grant if that individual enrolls in an eligible PEP at a public, private nonprofit, or vocational school (but not at a proprietary school).

The cost of attendance (COA) for **confined or incarcerated students** is limited to tuition and fees; books, course materials, supplies, and equipment; and the cost of obtaining a license, certification or a first professional credential (See *Volume 3*, Chapter 2 for more on COA). The specific requirements of an eligible PEP are outlined in the regulations at 34 CFR 668.236. For more information about these requirements, please review *Volume 2*, Chapter 2 of the FSA Handbook. There is also a Prison Education Program Q&A, and a Topics Page on PEP on the Knowledge Center which includes links to fact sheets, Dear Colleague Letters, and application materials.

Students who are confined or incarcerated remain ineligible for Direct Loans during the period of their incarceration. Although there are no statutory or regulatory limitations on eligibility for TEACH Grants, Federal Supplemental Education Opportunity Grants (FSEOG), or Federal Work Study (FWS) for confined or incarcerated individuals, they may not qualify for these types of assistance due to other program eligibility requirements. However, schools that enroll confined or incarcerated individuals must consider whether they would qualify for assistance under these programs when awarding aid.

For more details on Pell Grant eligibility of confined or incarcerated individuals, see *Volume 7* of the *FSA Handbook* and Dear Colleague Letter GEN-23-05. For more details on verification requirements for incarcerated students, see the *Application and Verification Guide* and Dear Colleague Letter GEN-23-12.

Confined or incarcerated individual

HEA Sec. 483(t)(1)(A), 483(t)(3), 484(b)(5)

Final Regulations 10/28/22

34 CFR 600.2, 34 CFR 668.236, 668.32(c)(2)(ii), 34 CFR 668 Subpart P

DCL GEN-22-15

Prison Education Programs

Prison Education Program (PEP) information

Conflicting Information

In addition to reviewing data provided by the Department's application system and NSLDS, your school must have an internal system to share information relevant to the student's eligibility, such as their academic standing. Regulations require a school to develop an adequate system to ensure the consistency of any data related to a student's application or eligibility for federal student aid regardless of the source of that data.

If your school has conflicting information for a student or you have any reason to believe the student's application is incorrect, you **must** resolve such discrepancies before disbursing *Title IV* funds. If you discover a discrepancy after disbursing *Title IV* funds, you **must** reconcile the conflicting information and require the student to repay any aid for which they weren't eligible, unless they are no longer enrolled for the award year and will not re-enroll. Your school is responsible for reconciling all inconsistencies that it receives with one exception: if the student dies during the award year, you aren't required to resolve conflicting information.

If you are unable to resolve the conflicting information, you must consider the student to be in overaward status for any need-based aid that was disbursed. Federal Work Study (FWS) funds do not need to be repaid, but you must immediately cease paying any further unearned FWS funds.

For more information on conflicting information, please refer to the *Application and Verification Guide* and *Volume 2*.

Resolving FAFSA Submission Summary comment codes

[FAFSA Specification Guide](#)

Conflicting information

[34 CFR 668.16(b)(3)](#) and [(f)](#)

Changes in Eligibility Status

A student's eligibility status can change during the award year, which almost always affects whether they can be paid. The special rules for changes in satisfactory academic progress status were discussed in the SAP section. For more details on Pell Grant status changes within and between terms, see *Volume 7*.

Gaining Eligibility

A student who **gains eligibility** is one who was previously ineligible for some reason. In general, a student who gains eligibility may receive Pell Grant, TEACH Grant, and Campus-Based program funds for the entire payment period and Direct Loan funds for the period of enrollment in which they become eligible (unless they have regained eligibility through satisfying the requirements of SAP, in which case eligibility is only regained from the beginning of the payment period).

A student is eligible for Pell Grant, TEACH Grant, and Campus-Based aid for the entire award year, not just the payment period, in which they become eligible by meeting the requirements for citizenship, including becoming an eligible noncitizen, or having a valid Social Security number.

Normally (i.e. not through the Fresh Start initiative), when a student regains *Title IV* eligibility after a loan default, the borrower regains *Title IV* grant eligibility beginning with the payment period in which the default was resolved and regains Direct Loan eligibility beginning with the period of enrollment in which the default was resolved. For more on regaining eligibility via Fresh Start, see the Resolving *Default Status* section in Chapter 3.

To illustrate how students can gain eligibility, we can look at two hypothetical students, Roy and Leon. Roy enrolls in a one-year certificate program. The school won't officially admit Roy before he provides an academic transcript from his previous school, but it lets him start classes in the fall. The school receives Roy's transcript after he's attended for a month and officially admits him. He's still in his first payment period when admitted, so he can receive Pell Grants and Campus-Based funds for his entire period of enrollment. The school can also use the program length of one year as the period of enrollment for which Roy can receive a loan.

Leon is finishing his senior year in high school; his classes end June 4. He decides to start classes in the winter term at college on January 11. The second payment period begins on May 17. Leon isn't eligible for aid when he first starts classes. However, when he becomes eligible after June 4, the school can disburse Pell Grants and Campus-Based funds to Leon retroactively for the current payment period that started on May 17 (but not for the payment period that started in January) and a Direct Loan for the current period of enrollment, which does include the payment period that began in January.

Losing Eligibility

A student cannot receive any *Title IV* aid after losing eligibility unless they qualify for a late disbursement.

Religious Order Student Eligibility

Effective July 21, 2021, previous regulations, which considered students attending religious orders to have no need for *Title IV* aid, have been eliminated. Such students may now be considered to have financial need, in accordance with Part F of *Title IV* of the HEA, and are eligible to receive Pell Grant, Direct Loan, FWS, and FSEOG funds, if they meet all other student and program-specific eligibility criteria.

Selective Service

The *FAFSA Simplification Act* amended Section 484 of the *HEA* to remove the requirement for male students to register with the Selective Service before the age of 26 to be eligible for *Title IV* aid. This question has been removed from the FAFSA form, and there will no longer be any associated comment codes or messaging that indicates that a resolution is necessary.

For additional details about this change and its implementation, see Dear Colleague Letter [GEN-21-04](#) on the Knowledge Center.

U.S. Citizenship & Eligible Noncitizens

A student must be a U.S. citizen or national, a citizen of the Freely Associated States, a lawful permanent resident, or other eligible noncitizen to be potentially eligible for federal student aid. In this chapter we describe how the student's FAFSA information is matched with other agencies to determine citizenship or immigration status. We also describe the immigration documents that you may need to collect to ensure the student's eligibility.

U.S. Citizenship and Eligible Categories

A student must be one of the following to be eligible to receive federal student aid:

- **A U.S. citizen or U.S. national;**
- **A citizen of the Freely Associated States: the Federated States of Micronesia and the Republics of Palau and the Marshall Islands.** These students can only receive aid from some of the FSA programs and do not have an A-number (A-number has replaced Alien registration number/ARN). See "Citizens of the Freely Associated States" section later in this chapter); or
- **A lawful U.S. permanent resident or other eligible noncitizen.**

The Department matches all applications with the Social Security Administration (SSA) on U.S. citizenship status. If U.S. citizenship or nationality cannot be confirmed, the student must provide documents proving U.S. citizenship or nationality, citizenship of the Freely Associated States, lawful permanent residence, or other eligible noncitizen status in order to satisfy the citizenship requirement for *Title IV* eligibility. If the student provides an A-Number on the FAFSA form, their record is also sent to the Department of Homeland Security (DHS) to check noncitizen immigration status or category. The results of both matches appear on the Institutional Student Information Report (ISIR), and a failed match with either agency will produce a "C code" on the student's ISIR. A student's U.S. citizenship or nationality (or eligible noncitizen) status only needs to be checked once for the award year; if the student has an eligible status at that time, the student remains potentially eligible for the rest of the award year (with the exception of parolees; see the "Third-Step Verification" section below).

If a parent wants to take out a PLUS loan for a dependent undergraduate student, both the parent and the student must be a U.S. citizen, national, or eligible noncitizen.

U.S. Citizenship and U.S. Nationality

A person is a U.S. citizen by birth, naturalization, or operation of law. Persons (except for the children of foreign diplomatic officers accredited to the United States or other persons with comparable diplomatic status) born in the 50 states, the District of Columbia, and, in most cases, Puerto Rico, the U.S. Virgin Islands, Guam, and people born on or after November 4, 1986 in the Northern Mariana Islands are U.S. citizens. Also, many persons born abroad to U.S. citizen parents (or a parent) may be U.S. citizens. All U.S. citizens are considered U.S. nationals, but not all U.S. nationals are U.S. citizens. Persons who are not U.S. citizens, but were born in American Samoa, Swains Island, or the U.S. Minor Outlying Islands are not U.S. citizens but **are** U.S. nationals, and therefore may also receive *Title IV* funds.

Child Citizenship Act (CCA)

The *CCA* became effective on February 27, 2001. As of that date, foreign-born children who are not U.S. citizens at birth become citizens once these conditions are met

- at least one parent (biological or adoptive) is a U.S. citizen,
- the children live in the legal and physical custody of that parent,
- they are under 18 years of age, and
- they are a lawful permanent resident

Children newly entering the country who are adopted abroad prior to the issuance of their IR-3 visa (for orphans) or IH-3 visa (for children from countries party to the Hague Convention on the Protection of Children and Cooperation in Respect

of Intercountry Adoption) become citizens upon admission to the United States. They generally receive a Certificate of Citizenship within 45 days instead of receiving a permanent resident card. For more information see https://www.uscis.gov/policy-manual/volume-12.

Children who are adopted after being admitted to the U.S. with an IR-4 visa (for orphans) or IH-4 visa (for children from Hague Convention countries) become citizens once their adoption is completed (or they are re-adopted or obtain state recognition of foreign adoption) in the United States. Parents of these and other children who do not automatically receive a certificate of citizenship can request one by filing Form N-600. For more information, contact the USCIS, visit the website at www.uscis.gov, or see the State Department's intercountry adoption website at http://adoption.state.gov/.

If a student who falls under this category fails the citizenship match, the student would need to provide acceptable proof of citizenship by providing documents such as those listed below under the U.S. citizenship documentation section.

Citizenship

HEA Sec. 484(a)(5), 34 CFR 668.32(d), 34 CFR 668.33, and Subpart I of Part 668.

U.S. Citizenship Match With the SSA

All applications are matched with SSA records to verify U.S. citizenship status, name, date of birth, and Social Security number (SSN) (see *Chapter 4*). The FAFSA Processing System (FPS) will reject the application for insufficient information if name, date of birth or SSN is not provided. The student's match result is reported in the "SSA Citizenship" field and Match Flags section on the FAFSA Submission Summary and ISIR. If the student leaves the citizenship question blank on the FAFSA form, the FPS will still attempt the citizenship match with the SSA. If there is a complete match with the student's SSN, name, date of birth, and U.S. citizenship, the FPS will report the student to be a U.S. citizen.

- **Successful match.** The FAFSA Submission Summary and ISIR will have a match flag (but no comment) indicating that the student's U.S. citizenship status was confirmed.
- **Data doesn't match.** If the student's SSN, name, or date of birth doesn't match SSA records, their U.S. citizenship status can't be confirmed and a C code and a comment will appear on the output documents (FAFSA Submission Summary and ISIR). If the student misreported their SSN, name, or date of birth (see Chapter 4 for more on SSN match problems), they should correct the appropriate field on their FAFSA Submission Summary and re-submit it. The FPS will perform the match again, and you must see if the new ISIR confirms the student's U.S. citizenship status; if it does, the C code will no longer appear.
- **U.S. citizenship not confirmed.** The ISIR and FAFSA Submission Summary will include a C code and a comment (**code 018**) explaining that the SSA was unable to confirm the student is a U.S. citizen and that they need to provide their college or career school's financial aid office with documents proving U.S. citizenship (see below). If the student provides eligible noncitizen documentation, you or the student must make a correction by entering the student's A-Number on the ISIR or FAFSA Submission Summary , and changing their citizenship status to "Eligible noncitizen" (Question 13). If you are making the correction, also click "yes" on the drop-down box in the "Resend Record to Matches" field before clicking the "submit" button. FPS will attempt a match with DHS records to confirm the student's immigration status or category.

Note that U.S. citizens born abroad might fail the citizenship check, unless they have updated their citizenship information with SSA (see "Updating status for U.S. citizens born abroad" later in this chapter).

U.S. Citizenship Dcumentation

If a student must prove their status as a U.S. citizen or national, only certain types of documentation are acceptable. The Department doesn't specify all of the **acceptable** documents, but some documents you might choose to use to prove U.S. citizenship include:

- **A Certificate of Naturalization (Forms N-550 or N-570)** issued by USCIS, the former INS, or a court to individuals who naturalize. You must copy this document for the student's file. If the student presents evidence of U.S. citizenship, but SSA did not identify them as a U.S. citizen, you should advise the student to update their status with SSA.
- **A Certificate of Citizenship (Forms N-560 or N-561)** is issued by USCIS or the former INS to individuals who derive or acquire U.S. citizenship through a parent.
- **A copy of the student's birth certificate** showing that the student was born in the U.S., which includes Puerto Rico (on or after January 13, 1941), Guam, the U.S. Virgin Islands, American Samoa, Swains Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats accredited to the U.S. or other person with comparable diplomatic status in the United States. If a student has a birth certificate from a U.S. jurisdiction showing that the student was born abroad (i.e., not in the U.S. or its territories), that birth certificate is not acceptable documentation. See below for acceptable State Department documentation.
- **A U.S. passport,** issued by the State Department, during its period of validity (except "limited" passports, which are typically issued for short periods such as a year and which don't receive as much scrutiny as a regular passport when applying). In the case of nationals who are not U.S. citizens, the passport will be stamped "Noncitizen National" (keeping in mind that nationals are potentially eligible for *Title IV* aid). Five-year-duration U.S. passports commonly issued to younger travelers are considered acceptable documentation and are not considered "limited". One-year-duration U.S. passports are **not** acceptable documentation.
- **A wallet-sized passport card,** issued by the State Department, is a fully valid attestation of the U.S. citizenship and identity of the bearer during its period of validity, but can only be used for land and sea travel between the U.S. and Canada, Mexico, the Caribbean, and Bermuda. A student may apply for a U.S. passport card at the U.S. State Department website: https://travel.state.gov/content/travel/en/passports/apply-renew-passport/card.html. For more detail, see 22 CFR 51.4(b)(2).
- **A copy of Form FS-240 (Consular Report of Birth Abroad), FS-545 (Certificate of Birth Issued by a Foreign Service Post), or DS1350 (Certification of Report of Birth).** These are State Department documents related to U.S. citizenship.

Before you can disburse aid, the student must present documentation that verifies that they are a U.S. citizen or national. If the documents indicate that the student is a U.S. citizen or national, you may award and disburse aid to the student and the C-code may remain on the student's ISIR. Keep a copy of the documentation in the student's file, even though older versions of the Certificate of Citizenship and of the Certificate of Naturalization instruct the holder not to photocopy them. Citizenship documentation must be kept in the student's file but does not need to be verified by any outside agency. Handling of documents for eligible noncitizens differs, and is discussed later in this chapter. The student can also contact the SSA to update the student's record. This updating is not required to receive aid but may prevent issues with SSA matching in the future.

At your school's discretion, you may permit U.S. citizen and U.S. national students to photocopy, scan, or otherwise image their citizenship documents, and submit either electronic images or paper copies of the same to the school's financial aid office for the purpose of determining their eligibility for *Title IV* funds. For more information, see Dear Colleague Letter GEN-15-18.

Updating Status for U.S. Citizens Born Abroad

Students born abroad to U.S. citizen parents are U.S. citizens if they meet certain requirements, and their status is usually noted in the SSA's database when they receive an SSN. But occasionally, a student may not have provided sufficient proof of U.S. citizenship to SSA for the record to be updated. These students will fail the U.S. citizenship match, even if they have an SSN. If this occurs, the student must provide the school proof of U.S. citizenship as outlined below. The student should contact the SSA to have their record corrected, however, this update is not required to receive aid.

Such students can document US. citizenship by providing a "**Consular Report of Birth Abroad**" (**Form FS-240**, which is *proof* of U.S. citizenship), a "**Certification of Report of Birth**" (**Form DS-1350**, which is evidence of U.S. citizenship and equivalent to a birth certificate), a **Certification of Birth Abroad of a Citizen of the United States (Form FS-545), or a Certificate of Citizenship** issued by USCIS. The DS-1350 and FS-545 forms are no longer issued but are still accepted as documentation of U.S. citizenship. If the birth of the student was registered with the American consulate or embassy in a foreign country before they turn 18, they can request the FS-240 or Certificate of Citizenship by sending a written, notarized request to the U.S. Department of State's Passport Vital Records Section. The State Department does

not reissue new DS-1350s. If the student had a DS-1350 and lost it, or never received a FS-240 or Certificate of Citizenship before turning 18, the student may apply for a U.S. Passport from the State Department or for a Certificate of Citizenship from USCIS. To apply for a Certificate of Citizenship, the student should file Form N-600, available at the USCIS webpage: https://www.uscis.gov/n-600.

For pictures of the U.S. citizen documents listed above, see the end of this chapter.

Citizenship Not Confirmed (Vol. 1 Chapter 2, Example 1)

The student is a U.S. citizen, but SSA doesn't confirm his U.S. citizenship status. The FAA asks him to submit documentation of his status. The student first submits a Social Security card, but the administrator explains that the card doesn't document his status because noncitizens can have Social Security cards. The student then brings in his Certificate of Naturalization. The FAA makes a copy of the certificate for his file and tells the student his citizenship has been documented. She also advises the student to have the SSA correct its database so that he won't have this problem again.

Suspect Documents

If you are able to discern that a document is fraudulent, you must deny the student *Title IV* aid. If the student submits conflicting information regarding immigration status on the FAFSA form, you must resolve any discrepancies before disbursing *Title IV* aid. Report altered or misreported information to the Department's Office of Inspector General at 1-800-MIS-USED or the OIG's website at: https://www2.ed.gov/about/offices/list/oig/index.html.

Mandatory Name Changes

Whenever a student legally changes their name because of marriage, divorce, court order, or any other reason, they must tell the SSA so they can get a corrected card and have correct SSN matches in the future. The student must bring the appropriate documents to prove the change to their local SSA office. See https://secure.ssa.gov for more information.

Parent Signature on Certificate

Because documents such as a certificate of citizenship can go to minors, they may be signed by a parent or guardian instead of the minor child. This does not affect the legitimacy of the document.

Citizens of the Freely Associated States

The *Compact of Free Association* (P.L. 99-239) created three political entities from the former Trust Territory of the Pacific Islands. Two of these entities, the Republic of the Marshall Islands (RMI) and the Federated States of Micronesia (FSM), voted in 1986 to end political ties with the U.S. The third entity, the Republic of Palau, voted to ratify the compact in 1994; its independence was effective October 1, 1994. These three entities are collectively known as the Freely Associated States. See 34 CFR 600.2.

Students who are citizens of the Freely Associated States are eligible for Pell Grants (citizens of Palau are also eligible for FWS and FSEOG; see below) but are not eligible for Direct Loans. These students should have a passport from the Freely Associated States or a I-94 form.

The student should indicate on the FAFSA form that they are an eligible noncitizen and leave the A-Number item blank.

Because the student isn't providing an A-Number, their application won't go through the DHS match. Do not complete a third-step verification for these students—they will fail the match. Instead, request documentation of the student's Freely Associated States citizenship. Once you have received the student's document establishing their status, as a citizen of the Freely Associated States, make a copy of the document and place it in the student's file. You can reuse the original document in future years if it hasn't expired.

No FSEOG and FWS/Compact Amendments Act

The *Compact of Free Association Amendments Act* of 2003, or the *Compact Amendments Act*, eliminated eligibility for citizens of the RMI and the FSM for FSEOG and FWS funds. To mitigate this loss, the *Compact Amendments Act* authorizes

Supplemental Education Grants that are awarded to the FSM and RMI. For more information, students of the FSM and RMI should contact their local education authority.

Eligible Noncitizen Match With DHS

The U.S. Department of Homeland Security (DHS) assigns an A-Number to most noncitizens, which FSA uses to identify which applications must be sent to DHS for immigration status verification. **If the applicant indicates on the FAFSA form that they are an eligible noncitizen and provides an A-Number, identifying information is sent to the DHS for eligible noncitizen verification.**

The results of the match are shown by a match flag in the "FAA Information" section of the output document, under the headings "DHS Primary Status," "DHS Secondary Match Status" (Secondary Confirmation Flag), and "DHS Case Number" on the FAFSA Submission Summary and ISIR. There will also be a comment about the results on the output document.

Because all applications are matched with the SSA, an application with an A-Number will be matched with both DHS and SSA records. When results are received from both matches, a successful SSA match will indicate that the student is a U.S. citizen. If the SSA match is unsuccessful, the DHS match status will determine the student's eligible noncitizen status/category.

- **Successful match** (Y primary match status) - if the match confirms the student's immigration status or category as an eligible one, they can receive aid if the other eligibility criteria are also met. **Comment code 154** will appear on the FAFSA Submission Summary and ISIR, and the successful match results are documentation of the student's eligibility. If you have other information about their status that seems to contradict the successful match result, you must resolve the conflict before paying the student (see "Conflicting Information" in *Chapter 1*) by performing the third-step verification process.
- **Record was not sent to DHS due to data entry errors** (blank match status) - the match won't be attempted if the student left the A-Number field blank, if the student said they were an eligible noncitizen but provided no A-Number (**code 022**), or if they changed their response to the citizenship question (**code 019**) or changed their A-Number after previous verification by the DHS (**code 020**). Instead, the student will receive a C code and a comment explaining the problem and directing them to provide the school with their most recent immigration documentation to support their eligibility. Compare the student's immigration document with the FAFSA Submission Summary/ISIR to determine the appropriate resolution action. If you or the student corrects the A-Number and resubmits it so that the match can be conducted, and the student's eligibility is confirmed as an eligible noncitizen, the C code will not appear on the new ISIR. To match the corrected ISIR with DHS, click "yes" on the drop-down box in the "Resend Record to Matches" field before submitting the correction. If the student's eligibility is not confirmed, (**primary match status = N**), check their DHS secondary match status to determine how to proceed.
- **Student's noncitizen status/category has not yet been confirmed** (N primary match status and C code) - DHS will continue to check its records in a process called **automated secondary confirmation**. The FAFSA Submission Summary and ISIR will have comment **code 155** and a primary match flag of "N" indicating that the procedure is still in process. Within three to five business days, the FPS should generate a FAFSA Submission Summary and ISIR indicating the result in the secondary match status field. The "DHS Secondary Match Statuses and Comment Codes" subsection below explains each status, its meaning, and how to proceed.
- **A case has already been submitted** (D primary match status) - cases that are already in review at DHS (i.e., a case with the A-Number provided on the FAFSA form has already been created) are given a "D" status, and comment code 288 is displayed. If you have questions about this status, please contact applicationsystemsdivision@ed.gov.
- **An invalid A-Number was provided** (I primary match status) - the value of "I" indicates that an invalid A-Number was submitted and comment code 289 is displayed.

A correction to the student's name, date of birth, or A-Number made while the DHS is conducting the automated secondary confirmation may start the process over, and the correction may be sent through primary confirmation. Though unlikely, if the new primary match status yields a "Y," the transaction can be used to award aid. The new transaction may have a new DHS verification number assigned. A correction made to a transaction that contains secondary match statuses of "Y" or "C" (or a transaction with a primary match status of "Y") will not be sent through the DHS match again. Otherwise, the record will be resent for matching.

DHS Secondary Match Statuses and Comment Codes

- Y, 292: Student's eligibility confirmed. You can process their aid.
- C, 294: Student's eligible noncitizen status/category has not yet been verified. You must wait 10 business days for another ISIR with an updated match result. If there is no update, begin the third-step verification process.
- N, 293: The student's immigration status/category was not confirmed. The school must now perform third-step verification.
- P: Pending result of Secondary DHS Match, the student's case is still processing. Wait for an updated ISIR with a secondary match status before proceeding. There is no Comment Code associated with this match status.

DHS Case Number on the ISIR

When a record is processed through the FPS match with DHS, a 15-digit case number is assigned to the student and printed in the "FAA Information" section of the FAFSA Submission Summary and ISIR. This 15-digit number, along with the applicant's date of birth, is needed to access the student's SAVE record, and to submit a third-step verification request through SAVE.

A-Number Corrections and Additions to the FAFSA Form

- **If the citizenship question is blank but there is an A-Number**, the FPS will send the record to DHS for matching.
- **If both the citizenship question and the A-Number are blank**, the record will not be sent to DHS. The output document will explain that SSA was unable to confirm that the student is a U.S. citizen. The student must submit a correction to the citizenship status and A-Number if they are an eligible noncitizen.
- **If U.S. citizen or national is selected, but the student provides an eligible noncitizen document**, correct question 13 on the ISIR to "eligible noncitizen" and enter the A-Number and click "yes" on the drop-down box in the "Resend Record to Matches" field. This correction will tell FPS to send the record to the DHS Primary match (for the first time). Ignore comment code 018 from SSA on the current ISIR. Wait for the DHS Match statuses on the student's next ISIR to determine if the student is an eligible noncitizen or if a third-step verification is necessary.
- **If the A-Number on the FAFSA Submission Summary or ISIR does not match the A-Number on the student's immigration document**, correct the A-Number in field 13 and click "yes" on the drop-down box in the "Resend Record to Matches" field. This will send the corrected record which DHS considers a new record because of the new A-Number to the DHS Primary match. Ignore DHS comment codes **293** and **294** on the current ISIR. Do not complete third-step verification unless the DHS Match statuses on the resulting ISIR indicate that third-step verification is necessary. For more detail on these codes, see the 2024-25 FAFSA Specification Guide on the Knowledge Center.

Conditions requiring secondary confirmation

34 CFR 668.133(a)

School policies and procedures on secondary confirmation

34 CFR 668.134–135

Third-Step Verification

If the student didn't pass secondary confirmation or if you have conflicting information about their immigration status/category after receiving a primary or secondary match result, you must review the record for third-step verification.

Third-step Verification Preparation

1. Request the student's most current, unexpired immigration document. When it is submitted, make a copy of it.

2. Carefully review the student's immigration documentation against the status/category and document descriptions below.

3. Determine whether the student's immigration documentation supports eligibility for *Title IV* aid. If it does not support an eligible status, you can tell the student that they are not eligible now, but may be eligible if/when they provide eligible noncitizen documentation. You should not complete third-step verification for this student.

For more on using the SAVE system to complete third-step verification, see the section titled "Using the SAVE System for Third-Step Verification" later in this chapter.

Eligible Noncitizens and Documentation

Certain non-U.S. citizens may be eligible for *Title IV* aid. Non-citizen eligibility for *Title IV* aid, as a federal public benefit, is restricted under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) to persons who are able to demonstrate certain types of eligible noncitizen statuses as a "qualified alien" under 8 U.S.C. § 1641(b). In addition, *Title IV* of the HEA requires eligible noncitizens to be able to provide documentation that they are "in the United States for other than a temporary purpose with the intention of becoming a citizen or permanent resident" in order to establish their eligibility for federal student aid. In determining eligibility under both PRWORA and *Title IV* of the HEA, the Department accepts the following types of eligible noncitizen statuses as sufficient to demonstrate a person's eligibility for *Title IV* aid (see bulleted list below)."

The U.S. Department of Homeland Security (DHS) – including its component agencies U.S. Citizenship and Immigration Services (USCIS); Immigration and Customs Enforcement (ICE); and U.S. Customs and Border Protection (CBP) – and the U.S. Department of State (DOS) issue a number of documents to noncitizens. For general information and sample images, see the [USCIS SAVE Commonly Used Immigration Documents](#) page.

For classes of eligible noncitizens other than lawful permanent residents, evidence of their status is typically on the **I-94** form, but other documentation may also be acceptable. U.S. Customs and Border Protection (CBP) no longer issues a paper I-94 form, with the exception of asylees and certain parolees. In September 2015, CBP automated the refugee admission process. Refugees will no longer receive a paper form I-94 but will have access to an electronic form. Students without paper I-94 documentation may have their status confirmed by the electronic I-94 printout and/or a CBP stamp, showing class of admission and date admitted or paroled in their passport to confirm this status.

Form I-797 (Notice of Action) is USCIS's formal communication with customers and is issued when an application or petition is received or approved or to confer an immigration benefit.

Only when students have unsuccessful SSA and DHS matches, or if you have conflicting information must you perform third-step verification using the SAVE system to confirm that their documentation supports one of the following noncitizen status categories:

- Lawful permanent residents
- Conditional resident aliens
- Conditional entrants
- Refugees
- Persons granted asylum
- Persons paroled into the U.S. for at least one year
- Ukrainian citizens and nationals
- Afghan citizens and nationals paroled into the U.S. between July 31, 2021 and September 30, 2023
- Cuban-Haitian Entrants
- Victims of human trafficking
- Battered immigrants-qualified aliens
- Jay Treaty students

Each of these noncitizen status categories are discussed in the respective subsection below.

Lawful Permanent Residents

Lawful permanent residents (LPRs) are noncitizens who are legally permitted to live and work in the U.S. permanently. The standard document is the **Permanent Resident Card (Form I-551 since 1997) or Resident Alien Card (Form I-551 before 1997)**. Both forms are referred to colloquially as "green cards," though they have changed colors over the years. Possessors of the older **Alien Registration Receipt Card (Form I-151**, issued prior to June 1978) should have replaced it with a newer card, but for receiving *Title IV* funds it is acceptable as evidence of permanent residence. In general, students whose Permanent Resident Card (PRC) has expired may still be considered lawful permanent residents for FSA eligibility purposes; therefore, if they submit expired documentation, submit it to SAVE and base eligibility on the response.

LPRs may also present an **Arrival/Departure Record (Form I-94)** or the Departure Record (**Form I-94A**), with the endorsement "Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence. Valid until . Employment Authorized." This is used at land border ports of entry. If available, an I-551/PRC (also known as a "green card") is preferable to establish LPR status. The form will have an A-Number annotated on it and is acceptable if the expiration date has not passed.

The U.S. Department of State issues a **machine-readable immigrant visa (MRIV)** in the holder's passport. The MRIV will have a U.S. CBP inspector admission stamp, and the statement "UPON ENDORSEMENT SERVES AS TEMPORARY I-551 EVIDENCING PERMANENT RESIDENCY" will appear directly above the machine-readable section. An MRIV with this statement, contained in an unexpired foreign passport and endorsed with the admission stamp, constitutes a temporary I-551 form, valid for one year from the date of endorsement on the stamp.

USCIS issues the **U.S. Travel Document** (mint green cover), which contains 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)."

If the student has an **I-551 form with a baby picture**, they should update the I-551 with the USCIS. LPRs are expected to get a new picture and be fingerprinted at the age of 14. But you can submit the documents to USCIS and disburse *Title IV* funds to a student who has an I-551 form with a baby picture as long as you can confirm that it belongs to the student. You can do this by comparing the I-551 form to a current photo ID that has the student's name, date of birth, and signature. The current ID must also be consistent with any identifying information in the student's file.

A student who has an approved application for permanent residence on file with the USCIS and who is waiting for a permanent resident card should have a form **I-797, Notice of Action from USCIS** with "Notice Type: Approval Notice," as well as an A-Number, which will give notice of current status. Note that a pending **application** for lawful permanent resident status alone is not sufficient for determining eligibility for *Title IV* funds.

If a person is granted suspension of deportation or cancellation of removal by an immigration judge or by USCIS, USCIS will issue the noncitizen a **Form I-551**, which is evidence of LPR status. There is no special category for persons who have been granted suspension of deportation or cancellation of removal.

Some applicants from Afghanistan may be eligible as **Afghan Special Immigrant Lawful Permanent Residents (SI LPRs)**. These applicants may have MRIVs and/or foreign passports with a DHS, U.S. Customs and Border Protection (CBP) stamp admitting them with an SQ1, SQ2, SQ3, SQ7, SQ8, SW1, SW2, or SW3 Class of Admission. Others may have a temporary Form I-551 stamp in their passport or on a Form I-94. Others may have a Permanent Resident Card, whose expiration date may be extended by a Form I-797C, Notice of Action. Eligible SI LPRs will receive the "Lawful Permanent Resident" response in SAVE. Note that some SI LPRs may not have a physical immigrant visa in their passport and may not have a temporary Form I-551 stamp. For more details, see Dear Colleague Letter [GEN-23-04](#).

Conditional Permanent Residents

Conditional permanent residents are eligible for aid if their documentation has not expired. They may have a valid Form **I-551, I-94, I-94A**, or a **passport with an MRIV** bearing the statement, "Upon endorsement serves as temporary I-551 evidencing permanent residency."

A Form **I-551** for a conditional permanent resident is the same Form I-551 that is issued to regular lawful permanent residents, except that the card for a conditional permanent resident expires in two years, as opposed to 10 years for the regular card. A conditional permanent resident must file a petition to remove conditions on permanent residence. USCIS will review the petition and, if eligibility criteria are met, remove the conditions on permanent residence and issue a new PRC. Examples of Conditional Permanent Residents include:

- The Marriage Fraud Amendments established lawful permanent resident status on a conditional basis for two years to a noncitizen who obtains lawful permanent resident status through a qualifying marriage to a U.S. citizen or LPR. A qualifying marriage is one that was entered into less than two years before the spouse obtained lawful permanent resident status. This status may also apply to any of the spouse's children who are noncitizens.
- Qualified immigrant investors who invest in U.S. businesses and create jobs for U.S. workers are eligible to receive an employment-based 5th preference (EB-5) immigrant visa. Immigrant investors and derivative family members may obtain lawful permanent resident status on a conditional basis for an initial two-year period. If an immigrant investor files a petition to remove conditions, and USCIS approves the petition, USCIS removes the conditions on the investor's lawful permanent resident status.

Some applicants from Afghanistan may be eligible as **Afghan Special Immigrant (SI) Conditional Permanent Residents (SI CPRs)**. These applicants may have a foreign passport with MRIVs and a DHS, CBP stamp admitting them with a CQ1, CQ2, or CQ3 Class of Admission. These applicants may also have a temporary Form I-551 stamp in their foreign passport or on a Form I-94. Others may have a Permanent Resident Card. Eligible SI CPRs will receive the "Conditional Resident" response in SAVE. For more details, see and Dear Colleague Letter [GEN-23-04](#).

Conditional Entrants

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 lawful permanent resident alien under that category. Students may have a Form **I-94** with a stamp displaying "**Section 203(a)(7)**" and indicating that the person was admitted to the U.S. as a conditional entrant. **Because DHS stopped using this category after the enactment of the Refugee Act on March 31, 1980, you should not disburse *Title IV* funds if the student has a Form I-94 with conditional entrant status granted after that date.**

The stamps mentioned use blue security ink. The stamp contains three codes: the first is a two-digit code to the left of the date that designates the field office with jurisdiction over the port of entry. On most stamps, this code will be two numbers and no letters. Letters are currently only used on HQ stamps. The three-letter code located under the word "ADMITTED" shows the port of entry. The third code, to the right of the date, is the unique four-digit number. When referring to a particular stamp, the port of entry code and the stamp's unique number should be used.

The endorsement or stamp can be placed anywhere on the I-94. If the original stamp does not copy well due to the ink color, you should replicate it by hand on the photocopy. Because CBP offices don't have uniform procedures or stamps, you should contact the local office with questions regarding acceptable immigration documents.

Refugees

Refugee status continues unless terminated by DHS. Refugees are required to apply for Lawful Permanent Residency (LPR) status after one year and continue to be refugees even after they are granted LPR status. In September 2015, CBP automated the refugee process. A refugee will have an electronic Form **I-94** showing "RE" as the class of admission and an admit until indicator of "D/S" (indicating duration of status). The **refugee travel letter** provided by the Department of State will be annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA). While the form is now automated, a refugee may be in possession of an older paper I-94 or I-94A form or be provided a paper form upon request. The paper Form I-94 or I-94A is annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA). They may also have the old **Refugee Travel Document (Form I-571)** or the newer **U.S. Travel Document** annotated with "Refugee Travel Document Form I-571 (Rev. 9-2-03)."

Persons Granted Asylum (Asylees)

Persons granted asylum can apply for lawful permanent resident status after they have been physically present in the U.S. for at least one year since being granted asylum. Asylee status continues unless rescinded or terminated by DHS or the

Department of Justice or until lawful permanent resident status is granted. Asylees will have a Form I-94 or Form I-94A with a stamp showing a grant of asylum under Section 208 of the INA. They may also have a Form I-766, Employment Authorization Document, with a "A05" category. They may also apply for a refugee travel document. Asylees who leave the U.S. and attempt to return without proper travel documentation may have difficulty being readmitted to the U.S. as an asylee.

Noncitizens Paroled into the U.S. for at Least One Year (Parolees)

Persons paroled into the U.S. for at least one year must provide documentation of their parole category (such as a Form I-94 or Form I-766, Employment Authorization Document, with a "C11" category) and it must indicate that the student has been paroled into the U.S. for at least one year, with a date that has not expired (Title IV funds cannot be disbursed after the document has expired). They also must provide evidence such as having filed an Application to Register Permanent Residence or Adjust Status (Form **I-485**) or a beneficiary on a Petition for Alien Relative, (Form **I-130**) from DHS that they are in the U.S. for other than a temporary purpose and intend to become a citizen or LPR. DHS will usually respond to the filing of a Form I-485 with a Form I-797C, Notice of Action, indicating receipt of an application and a parolee must provide this Form I-797C or any other immigration document from DHS showing the student is in the U.S. for other than a temporary purpose and intends to become a U.S. citizen or LPR.

If the student does not submit a Form I-797C, send their alternative documentation to SAVE and ensure that the SAVE response is "Parolee-Expires" or "Parolee-Indefinite" and that the Pending Applications or DHS Comments sections indicate one of the documents mentioned above. (Form I-485 is an application for Lawful Permanent Resident status). Note that individuals classified as "Advance parolees" are never considered potentially eligible for *Title IV* aid.

Ukrainian Citizens and Nationals

Ukrainian citizens and nationals (and noncitizens who last habitually resided in Ukraine) paroled into the United States between February 24, 2022 and September 30, 2024 are eligible for entitlement programs and other benefits available to refugees admitted under section 207 of the Immigration and Nationality Act (8 U.S.C. § 1157) for the term of parole granted, unless the parole has been terminated by the Secretary of Homeland Security.

In addition, Ukrainian citizens and nationals (and persons who last habitually resided in Ukraine) paroled into the United States after September 30, 2023, are eligible for these benefits if they are the spouse or child of a Ukrainian paroled between February 24, 2022, and September 30, 2024, or the parent or legal guardian of an unaccompanied noncitizen child who was paroled between February 24, 2022, and September 30, 2024. The spouse, child, parent, legal guardian, or primary caregiver are eligible for these benefits for the term of parole granted, unless the parole has been terminated by the Secretary of Homeland Security.

For additional information, please see the Department of Homeland Security's **Uniting for Ukraine** webpage and **Fact Sheet**.

Ukrainian citizens and nationals paroled under the Uniting for Ukraine (U4U) process can obtain a copy of their electronic Form I-94, Arrival/Departure Record, from the **U.S. Customs and Border Protection website**. This Form I-94 record will include a "UHP" class of admission (COA). Ukrainian citizens paroled into the United States under Uniting for Ukraine may also have one or more of the following:

- Paper Form I-94 with a UHP COA;
- Foreign passport with parole stamp that includes a UHP COA; or
- Form I 766, Employment Authorization Document (EAD), with a "C11" category, if they have applied for and received one.

Ukrainian citizens and nationals paroled into the United States outside of the Uniting for Ukraine process may also obtain, or may have, the same documentation as those paroled under Uniting for Ukraine, but with a general parole COA, such as "DT" or "PAR" listed in their Form I-94, Arrival/Departure Record, and/or a parole stamp in their foreign passport. The "DT" COA indicates parole authorized by U.S. Customs and Border Protection District Office or Port of Entry. The "PAR" COA indicates parole authorized by USCIS.

If third-step verification is required, the financial aid office must ensure they provide one of the documents noted above as part of the third-step verification request. If SAVE is able to verify that the applicant is a parolee, SAVE will provide a

"Parolee-Expires" response and the period of parole. If there is a federal immigration record reflecting Ukrainian citizenship, the SAVE response will also state that the financial aid applicant is a Ukrainian citizen.

Unlike other parolee applicants, eligible beneficiaries paroled into the U.S. from Ukraine are not required to have been paroled for at least one year (although they generally have been), nor are they required to have additional documentation (such as a Form I-797C, Notice of Action, indicating receipt of a Form I-485 Application to Register Permanent Residence or Adjust Status) in order to show that they are "in the U.S. for other than a temporary purpose with intent to become a U.S. Citizen or Permanent Resident" (which is a requirement in under Section 484 of the *HEA*).

Ukrainian citizens and nationals paroled into the United States outside of the applicable timeframes will be required to comply with the standard parolee procedures as outlined in the bullet "Persons paroled into the U.S. at least one year" above.

Please note that some Ukrainian citizens and nationals may have other immigration categories that make them eligible for *Title IV* student aid, such as Refugee or Asylum. These applicants can also have their immigration status/category verified through SAVE.

Afghan Citizens and Nationals Paroled into the U.S. Between July 31, 2021 and September 30, 2023 (Afghan Parolees)

Afghan citizens and nationals paroled into the U.S. between July 31, 2021 and September 30, 2023 may be eligible as Afghan Special Immigrant Parolees or Non-Special Immigrant Afghan Parolees. SI Parolees may have a separate Form I-94 with the following notation:

> Special Immigrant Status (SQ/SI) Parolee
> Sec 602(b)(1) AAPA / Sec 1059(a) NDAA 2006
> Date __ USCIS officer: __

SI Parolees may also have a Form I-766, Employment Authorization Document (EAD), with a C11 parolee category. SI Parolees will receive the "Parolee-Expires" or "Parolee-Indefinite" response in SAVE, with SQ4 or SQ5 as the Class of Admission (COA).

Other applicants from Afghanistan may be eligible as Non-Special Immigrant Afghan Parolees. These students may also have an Employment Authorization Document (EAD), with a C11 category or a CBP "PAROLED" stamp in their passport. Some of these passports may have an "OAR" notation in the parole stamp. DHS recently began using this code to help distinguish these Afghans from other parolees. Non-SI Afghan Parolees will receive the "Parolee-Expires" or "Parolee-Indefinite" response in SAVE, with OAR, PAR, or DT as the Class of Admission (COA). For more on Afghan arrival categories and documents, see DHS-SAVE's Afghan Fact Sheet.

Unlike other Parolee applicants, SI Afghan Parolees and Non-SI Afghan Parolees are not required to have been paroled into the U.S. for at least one year (although they generally have been), nor are they required to have additional documentation in order to show that they are "in the U.S. for other than a temporary purpose with intent to become a U.S. citizen or Lawful Permanent Resident." This flexibility is a result of the Afghan Supplemental Appropriations Act and only applies to Afghans paroled between July 31, 2021 and September 30, 2023. This flexibility lasts until March 31, 2023, or the term of parole granted, whichever is later, unless the parole is terminated by the Secretary of Homeland Security. After that time, the Afghan arrival will be required to comply with the standard parolee requirements. For more details, see Dear Colleague Letter GEN-23-04.

Cuban-Haitian Entrants

Cuban-Haitian Entrant (CHE) as defined by Section 501(e) of the Refugee Education Assistance Act of 1980. All CHEs are potentially eligible for federal student aid. Note that certain documents showing that the holder is a Cuban-Haitian entrant may continue to demonstrate an individual meets the CHE definition even if the expiration date has passed. Please see Information for SAVE Users: Cuban-Haitian Entrants for examples of documentation, SAVE verification procedures, and other information regarding CHEs. If you are not sure whether documentation establishes that someone is a CHE, submit it as part of a third-step verification request following the instructions in the SAVE CHE information sheet. The SAVE response will let you know (in the "Cuban/Haitian Immigration Details" section) whether the submitted information and documentation is sufficient to verify that the student is a CHE. **Remember to click on the**

Cuban/Haitian Entrant Button to verify whether the individual meets the CHE definition. DHS will not verify this status if you do not click on the button.

Victims of Human Trafficking

Victims of human trafficking have the same eligibility for federal benefits as refugees under the *Victims of Trafficking and Violence Protection Act*. The Department of Health and Human Services (HHS), rather than the DHS, is responsible for certifying individuals that may have an I-94 with a T1 Class of Admission code for principal (other T-visa classes will be identified through DHS' SAVE process noted below). Because of this, these students will not pass the DHS match, and the normal paper third-step confirmation does not apply. You must instead review the student's certification or eligibility letter from the HHS and call the Office on Trafficking in Persons at 1-866-401-5510, as noted on the letter, to verify its validity and confirm that the eligibility has not expired.

You must note the date, time, and results of the call and retain a copy of the letter. If the student applies for federal student aid in a subsequent year at your school, you must call again to ensure that the student's status is still in force. The spouse, child, or parent of a trafficking victim might be eligible for aid. They will not have a certification letter but will have a **T-visa (e.g., T2, T3, or T4 for spouse, child, and parent of a T1 respectively)**. They will also likely fail the DHS match; if so, you must complete third-step verification. Once SAVE returns a third-step response, you should see "T2," "T3," or "T4" under the Class of Admission (COA) heading. If you do not see one of those codes in the SAVE response, but you believe that the individual is in fact the spouse, child, or parent of a victim of human trafficking, please email applicationsystemsdivision@ed.gov for assistance. SAVE may also return a response that indicates the individual would be ineligible (such as "nonimmigrant" or "application pending"). These statuses are usually not eligible for federal student aid; however, if any of the COAs noted above are indicated in the SAVE response you can disregard any reference to an ineligible status in the SAVE response.

Victims of human trafficking

DCL GEN-06-09

Battered or Abused Spouses or Children-Qualified Noncitizens

Battered or Abused Spouses or Chilren-Qualified Noncitizens, formerly known as Battered Immigrants-Qualified Aliens, are victims of domestic violence by their U.S. citizen or lawful permanent resident (LPR) spouses, former spouses, or parent. They may, with their designated children, self-petition for immigration classification under the *Violence Against Women Act (VAWA)* and be eligible for certain federal and state public benefits, including federal student aid. Note that both men and women may be approved as victims under *VAWA*.

These applicants can indicate on the FAFSA form that they are eligible noncitizens, though they will not pass the automated DHS match. Instead, they will need to obtain and provide you with documentation based on their case type: self-petition, prima facie, suspension of deportation, or cancellation of removal. Check the student's documentation carefully. If the immigration documents match the description below for an approval of petition or a prima facie case, the student should be considered an eligible noncitizen. Third-step verification through the SAVE system is not required.

If you have reservations about the documentation provided, or are unclear about the outcome reflected in the documentation, you must submit the student's documentation for third-step verification through the SAVE system. In SAVE, click on the "VAWA" button (in the "Agency Requests" section) for *VAWA* Verification. You will determine the student's eligibility for aid based on the result of the submission.

In **self-petitioning cases** under *VAWA*, the immigrant submits a petition (Form I-360) to USCIS, who will then either deny the petition, approve it, or make a finding that a prima facie case has been established. If USCIS determines that a self-petitioner has demonstrated prima facie eligibility, USCIS issues a Notice of Prima Facie Case (NPFC) to the self-petitioner. Either a Form I-360 approval or a prima facie finding potentially makes a student eligible for *Title IV* aid. In some cases,

the USCIS will acknowledge receipt of a petition, which does not establish eligibility for *Title IV* aid.

With an **approval of a petition**, the USCIS will provide a Form I-797, which will indicate it is an approval notice (with "Notice Type: Approval Notice") for a self-petitioning spouse of a U.S. citizen or LPR (with Section: Self-Petitioning Spouse of USC or LPR, and that the petition has been approved. A separate Form I-797 will be issued with the names and dates of birth of children listed by the applicant, and it will indicate that they are named on the approved petition. These children are potentially eligible for *Title IV* aid, and because their USCIS status continues after reaching the age of majority, their eligibility for aid continues as well. In some cases, a dependent child can petition for battered immigrant status; the Form I-797 would then indicate a self-petitioning child of a U.S. citizens or LPR.

If you submit prima facie documentation for third-step verification, SAVE may return the "VAWA Self-Petitioner" response. SAVE may provide a different response so you must also check the "Victim of Abuse" section. If you see an indication of an approved self-petition or prima facie *VAWA* status anywhere in the SAVE response, the applicant is eligible. If you have questions about the response, contact applicationsystemsdivision@ed.gov.

Self-petitioners may use the NPFC as evidence to establish their eligibility for certain public benefits and are eligible to renew their NPFC, as needed, until USCIS completes adjudication of the self-petition. NPFCs are initially valid for one year. If USCIS has not made a decision on the self-petition by the time the NPFC expires, USCIS automatically sends a renewed NPFC within 60 days of the expiration date. The NPFC is renewed for 180 days and continues to be renewed for 180-day periods until USCIS adjudicates the self-petition. If the Form I-360 is denied, USCIS does not re-issue or extend the NPFC.

If the student's documentation for the applicable award year is unexpired when you receive it, the student can be considered eligible for the entire award year. The student will remain eligible even if their documentation expires during the award year. Note that the student would be ineligible for a subsequent award year if the student's documentation is still expired. Also, if the documentation is expired when you receive it, the student is ineligible unless they provide you with documentation showing that their determination has been extended.

Children may be included on the Form I-797, though their eligibility is subject to the same expiration date. If a spouse is ultimately denied approval, their children on the Form I-797 would also be denied and be ineligible for aid.

If you submit prima facie documentation for third-step verification, SAVE may return the "VAWA Self-Petitioner" response. SAVE may provide a different response so you must also check the "Victim of Abuse" section. If you see an indication of an approved self-petition or prima facie *VAWA* status anywhere in the SAVE response, the applicant is eligible. If you have questions about the response, contact applicationsystemsdivision@ed.gov.

An immigration judge may issue a **suspension of deportation** or cancellation of removal of the abused person under the *VAWA*. For a suspension of deportation, the applicant will receive a **copy of the court order**. As long as it has not expired and clearly indicates suspension of deportation by the judge, an otherwise eligible person can receive *Title IV* funds. For a cancellation of removal, the applicant will receive a copy of the court order. As long as it has not expired and clearly indicates cancellation of removal by the judge, an otherwise eligible person can receive *Title IV* funds. Suspension of deportation or cancellation of removal documentation alone does not make a student eligible for *Title IV* funds. The documentation must reference a self-petition or prima facie determination for the student to be considered potentially eligible.

You must carefully examine the USCIS document and keep a copy in the student's file. If it indicates that the student is an approved self-petitioner or has an unexpired prima facie determination, you may award aid if the student is otherwise eligible. If a self-petitioner applies for *Title IV* funds in a subsequent year, you may rely on their original document. For a student with a prima facie determination, you may rely on their document as long as it is still unexpired. If the documentation has expired, the student is ineligible unless they provide you with documentation showing that their determination has been extended.

Certain American Indians Born in Canada (formerly Jay Treaty Students)

Section 289 of the *Immigration and Nationality Act (INA)* gives persons with at least 50% Native American blood who were born in Canada the legal right to live and work indefinitely in the U.S. This is based on the *Jay Treaty* of 1794 and subsequent court decisions. Such individuals are not subject to the legal restrictions typically imposed on aliens by the DHS, are not required to obtain documentation from the DHS, and are considered "lawfully admitted for permanent residence." They must obtain an SSN for purposes of applying for *Title IV* aid.

Students who may be eligible for *Title IV* funds should enter their valid A-Number on the FAFSA form and indicate they are eligible noncitizens. If they fail the DHS match, you must submit a third-step verification with the documentation. If they fail third-step verification, they can still be considered eligible if they meet the documentation requirements below for students without an A-Number.

Students who do not have an A-Number should enter A999999999 and indicate they are eligible noncitizens. Students who enter all 9's for their A-Number will receive comment 289 on the output document indicating that the A-Number provided is invalid. Please note that a DHS case number will not be generated in this instance, so you will not be able to submit a third-step verification request. Instead, the school must obtain proof from the student that USCIS or CBP has determined that the student meets the requirements of INA 289. These students are likely to have a Form I-551 PRC with the code S13, an unexpired temporary I-551 stamp with the code S13 in a Canadian passport, or an unexpired temporary I-551 stamp with the code S13 on an I-94. Information relating to this process can be found at https://www.uscis.gov/policy-manual/volume-7-part-o-chapter-5.

If you have questions about students who are American Indians Born in Canada, contact applicationsystemsdivision@ed.gov.

Form I-94 Website

DHS Customs and Border Protection (CBP) creates admission records electronically. The Form I-94 website allows travelers (and schools, if the traveler grants permission) to access admission records online (the website contains records from April 2011 to present). Unexpired paper Forms I-94 are also still valid.

CBP began issuing Forms I-94s with an alpha character in the 10th position of the 11-character identifier beginning in May 2019.

See *https://i94.cbp.dhs.gov/I94*.

Photocopying Immigration Documents

In most cases you will examine and copy original immigration documents, and you must keep a copy in the student's file with the results from the third-step verification/SAVE. For the purpose of applying for *Title IV* aid, institutional policy may permit students to legally photocopy, scan, or otherwise image immigration documents (such as Forms I-551 or I-94) and submit either electronic images or paper copies of the same to the institution's financial aid office to facilitate the confirmation of their status/category and to complete the third-step verification process. See Dear Colleague Letter GEN-15-08.

Eligible Noncitizen Name Changes

When an eligible noncitizen student changes their name, the student needs to update it with SSA and DHS. To update their name with DHS, students can contact the USCIS contact center at 800-375-5283 or visit https://www.uscis.gov/tools/uscis-tools-and-resources/information-about-your-immigration-document/updating-or-correcting-your-documents for more information. For the SSA update, the student must bring the appropriate documents to substantiate the change to their local SSA office. Visit *https://ssa.gov*.

Ineligible Statuses and Documents

There are several types of immigration documentation that do not substantiate a student's eligibility for *Title IV* aid. If a student only provides documentation that does not substantiate their eligibility for *Title IV* aid, they are not eligible. However, if a student provides multiple documents and some do support eligibility, they may be eligible for *Title IV* aid. Generally, if a student has both an eligible status as well as an ineligible status, the eligible status will trump the ineligible status, and the student will be potentially eligible for *Title IV* aid (pending other aspects of student eligibility as discussed in this volume). There are a variety of forms and their related statuses which are ineligible:

- **A Social Security card or driver's license** isn't acceptable for documenting U.S. citizenship or national status since ineligible individuals 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.

- **Notice of Approval to Apply for Permanent Residence (Form I-171 or Form I-464)** holders cannot receive *Title IV* funds.
- **Employment authorization documents (Form I-766, EAD)** alone do not support *Title IV* eligibility. However, a student with another eligible status and employment authorization can, potentially, be eligible. USCIS can verify an immigration status or category that may be eligible for aid using the information contained on an EAD.
- **Nonimmigrant visas** are held by those with work visas, students, visitors, and foreign government officials and do not convey eligibility for *Title IV* funds unless the student has a Form **I-94** with one of the endorsements given in the eligible document section, or a **T–Visa** as a victim of human trafficking. Ineligible nonimmigrant visa categories include (but are not limited to) the
    - **F-1, F-2, or M-1 Student Visas;**
    - **NATO Visas (NATO);**
    - **A2 and A3 Visas (foreign official, including attendants);**
    - **B-1 or B-2 Visitor Visas;**
    - **J-1 or J-2 Exchange Visitors Visas;**
    - **H series or L series Visas (which allow temporary employment in the U.S.); or**
    - **G series Visas (pertaining to international organizations).**
- **Form I-817, Application or approval for Family Unity Benefits** does not prove students are eligible.
- **Temporary residents allowed to live and work in the U.S. under the Legalization or Special Agricultural Worker program** are no longer eligible for Title IV funds.
- **Illegal aliens under the legalization (also called the amnesty) program established by the *Immigration Reform and Control Act* of 1986 (*IRCA*)** were given documentation that allowed them to work while their application for lawful permanent resident status was being processed. These students they aren't eligible for *Title IV* aid unless their application was approved.
- **Approval notice or EAD forms stamped with "Temporary Protected Status"** do not prove students are eligible.
- **Deferred Action for Childhood Arrivals (DACA)** status is granted by USCIS. Students granted DACA often are assigned an SSN, and they are not eligible for *Title IV* aid, but may be eligible for state or college aid, and submitting a FAFSA form can help them access those other types of aid. To complete the FAFSA form, DACA recipient students must enter their SSN and answer the citizenship status question as "Neither U.S. citizen nor eligible noncitizen." After submitting the FAFSA form, the student should check with the school's financial aid office to see what types of non-federal financial aid they may be eligible to receive.
- **Withholding of removal or deferral of removal orders** issued by an immigration judge or by the Board of Immigration Appeals. This is used to protect a person from return to a country that threatens the person's life or freedom. A withholding of removal order does not, by itself, make the student eligible for *Title IV* aid.
- **U nonimmigrants or U-Visa holders** are not designated as qualified aliens under the *Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA)* and are therefore not eligible for *Title IV* program funds. However, U-Visa holders may convert to lawful permanent resident (LPR) status after they have physically been present in the U.S. for a continuous period of at least three years after the date of admission as a u immigrant, if they meet other requirements. Documentation is usually on a Form **I-797 reflecting approval of Form I-485**. It is important for you to inspect the content of the document since the Form **I-797** is used for a variety of purposes.

    If the student becomes an LPR, they become a qualified alien under the *PRWORA* (see above), and thus potentially eligible for *Title IV* funds (assuming they meet all other eligibility requirements.) U-Visa holders should be encouraged to explore non-federal aid options to help them pay for school while waiting to convert to LPR status. StudentAid.gov contains information to help students search for possible scholarships and other resources.

- **A Form I-797C, Notice of Action** that shows a receipt of the student's application, or instructs the student to schedule a biometrics appointment with USCIS, does not support eligibility for *Title IV* aid (with the exception of Parolee students who have applied for certain immigration statuses, see the Persons paroled into the U.S. for at least one year section above). These documents indicate "THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT" at the top. A Form I-797 (no "C") with Notice Type: "Approval Notice" may be an eligible form of documentation if it approves the student's application for one of the eligible statuses listed above.
- **An Advance Parole** Document allows certain noncitizens with pending applications for certain immigration benefits

to seek parole into the U.S. after traveling abroad. The issuance of the Advance Parole Document does not alone make them eligible for *Title IV* funds.

If the document a student submits is for an ineligible status, you shouldn't submit the documentation for third-step verification, unless you have conflicting information or the student requests you to do so. USCIS will only confirm current immigration status/category based on the document presented; it doesn't determine whether the student is eligible for *Title IV* funds. Unless the student can submit documentation for an eligible status/category, as described above, or USCIS verifies the student's immigration status/category, the student can't receive aid.

U-Visa information

More information on U Visas may be found on the following website: *www.uscis.gov/green-card/other-ways-get-green-card/green-card-victim-crime-u-nonimmigrant*.

Using the SAVE System for Third-Step Verification

If the student's immigration documentation appears to support an eligible noncitizen status/category, or if you have conflicting information after receiving a secondary match result, you must complete a third-step verification request through the SAVE system. USCIS now returns third-step verification responses via the SAVE system.

To access the SAVE system, go to: https://save.uscis.gov/web/vislogin.aspx?JS=YES. If you have issues accessing SAVE with that link, try this one: https://save.uscis.gov/save/app/client/ui/home/?JS=YES.

In a collaborative effort, DHS the Department of Homeland Security and the Department of Education designed and implemented special functionality for schools to verifysubmit students' US citizenship or immigration status which is considered to determine third-step verification requests through the SAVE system to check students' eligibility for *Title IV* aid. To access the SAVE system, a unique SAVE user ID and password is issued to the Primary Destination Point Administrator (PDPA) at each school when they update their school's FTI SAIG Enrollment form.

All the instructions you need to access and navigate the SAVE system are available on the *DHS-SAVE, Eligible Noncitizen* page on the Knowledge Center. **Click on the "DHS-SAVE Electronic Third-Step Verification" link.**

For assistance with issues related to accessing the SAVE system, please contact applicationsystemsdivision@ed.gov.

Third-Step Verification Preparation and Submission Steps

First, request the student's most current, unexpired immigration document. When it is submitted, make a copy of it. Next, carefully review the student's immigration documentation against the status and document descriptions above. Finally, determine whether the student's immigration documentation supports eligibility for *Title IV* aid. If it does not support an eligible status, you can tell the student that they are not eligible now but may be eligible if/when they provide eligible noncitizen documentation. You should not complete third- step verification for this student.

The Resend Record to Matches Process

If you determine that third-step verification cannot be completed for a student, for example, when the case status is "closed," or the SAVE response doesn't match the immigration documentation provided by the student, you must complete the "resend record to matches" process in the FAFSA Partner Portal system, formerly FAA Access. This replaces the "requesting a new DHS verification number" process. For the full instructions, see the "Resend Record to Matches to Generate a new ISIR with a new DHS Verification Number" section of the SAVE instructions for U.S. Department of Education (School) Users Version 3.0 document.

Second and Third-Step Processing Delays

Second and third-step verification responses may be delayed, depending on the complexity of the case. More information on SAVE's current response schedule is available at https://uscis.gov/save.

If you have not yet submitted documentation for a student and are waiting for second-step verification to finish, do not search the student's DHS Case Number in SAVE. If you do, you will receive the "No cases found" message in SAVE. Before you check the student's case in SAVE, check the DHS Secondary Match Status on the student's ISIR. If the Flag is "P" (Pending result of secondary DHS confirmation), it means that the case is still processing. Wait for a new ISIR with a DHS Secondary Match Status of "N" (Citizenship not confirmed) before checking the case in SAVE. It can take several weeks for the new ISIR to generate with the new DHS Secondary Match Status.

If you receive the "No cases found" message in SAVE, do not "Resend Record to Matches" in the FAFSA Partner Portal, to generate a new transaction with a new DHS Case Number. Doing so generates a new SAVE case for the student while the first case is still processing and will result in a slower response. Again, wait for the DHS Secondary Match Status of "N" before checking the student's case in SAVE. If you receive the "No cases found" message in SAVE despite receiving a Secondary Match Status of "N," please email applicationsystemsdivision@ed.gov for further assistance.

If you have submitted a student's documentation for third-step verification, it can take SAVE several weeks to review the documents and provide a response. You will receive an email from SAVE when the response is available.

For additional guidance on the SAVE system and DHS Match Flags, see the SAVE Instructions for U.S. Department of Education (School) Users 3.0 document on the DHS-SAVE Electronic Third-Step Verification page.

SAVE Third-Step Responses

SAVE third-step verification is a manual search of available immigration records. If you don't receive a response from the USCIS after **at least 15** business days from the date you sent the third-step verification request, if you have sufficient documentation to make a decision, and if you have no information that conflicts with the student's documents or claimed status/category, you should review the student's file and determine whether they meet the eligible noncitizen requirements (note – this only applies for third-step verification and does not apply if you are waiting for a result of second step verification). If the student meets the requirements, make any disbursement for which they are eligible and note in their file that SAVE exceeded the time allotment and that noncitizen eligibility was determined without their verification.

When third-step verification results in an eligible status or category, you must keep a copy of the SAVE response screen. If the third-step verification process indicates a discrepancy, you must ask the student to correct the discrepancy with the USCIS. No certification of loans or further disbursement of funds can be made until the discrepancy is corrected. If the discrepancy isn't reconciled, the student must repay all aid except wages earned under FWS. Whenever the student is able to provide new information, it must be submitted to SAVE as a third-step verification request.

If you have followed the procedures outlined here, including notifying the student of the discrepancy and withholding further payments and loan certifications as soon as a discrepancy is found, your school isn't liable for aid disbursed prior to third-step verification. This assumes that you had no other conflicting information prior to making the disbursement and had reviewed the available documentation and concluded that the student was otherwise eligible.

Lack of Response (Volume 1, Ch 2, Example 2)

The student is a refugee and received aid from a school. His status wasn't confirmed through the DHS match, so the school performed third-step verification. DHS didn't respond in time, so the school paid the student without any response. When the student applies again, the DHS match still doesn't confirm his status. Even though the school began third-step verification for the student last year and his documents haven't expired, because the school never received a SAVE response, the school must perform third-step verification again.

Eligible Noncitizen Status not Confirmed (Volume 1, Ch 2, Example 3)

On his original application, the student didn't give his A-Number and reported that he was a citizen. When the SSA didn't confirm this, the student told the FAA at the school that he was a permanent resident. He added his A-Number and changed his citizenship status to eligible noncitizen but the Systematic Alien Verification for Entitlements system (SAVE) didn't confirm his status as an eligible noncitizen. He explained to the aid administrator that he had applied for permanent resident status but didn't have documentation yet. The FAA administrator told him that when he received documentation

that his application was approved, he should bring it to the school so that it could be submitted to the USCIS for confirmation. The FAA told him to bring any information supporting his current immigration status to Fowler so that it could be submitted to the USCIS for confirmation. Depending on the documentation the student provides, it's possible he will be considered an eligible noncitizen in a class other than permanent resident.

15 business day USCIS timeframe

[34 CFR 668.136(b)(3)](#)

Interpreting the SAVE Response

SAVE is responsible for verifying the student's immigration status/category. The SAVE response does not indicate whether the student is eligible for *Title IV* funds. It is the school's responsibility to determine if the student is eligible based on the student's immigration documentation and the SAVE response. When you receive the SAVE response, compare it with the list of responses below. If it matches with a response, and with the student's documentation, and supports an eligible status/category, then the student is eligible (assuming they meet all other student and program eligibility requirements). If it matches with a response, and the student's documentation, but does not support an eligible status, tell the student they are ineligible until/unless they can provide documentation that supports an eligible status.

If the student's documentation supports an eligible noncitizen status/category but the SAVE system response shows an ineligible status, read the DHS comments and resolve issues raised there (for example, provide a cleaner copy of the student's documentation if instructed by USCIS). Once resolved, check the bottom of the SAVE response. If you see a "Still not sure? Institute Additional Verification" link, click the link and submit the student's new documentation on the next page. If you do not see this link or the student's case is closed, use the Resend to Matches process (see above) and resubmit third-step verification. If you have questions about the SAVE response or about the student's documentation, contact applicationsystemsdivision@ed.gov and briefly describe your issue.

The following list explains whether a response means the student is eligible or ineligible for *Title IV* aid. For descriptions of the following immigration statuses/categories, see the earlier sections on eligible and ineligible noncitizens and their documentation:

Potentially Eligible Statuses or Categories:

- **"Lawful Permanent Resident"**
- **"Conditional Resident"**
- **"Asylee" or "Refugee"**
- **"Parolee-Expires" or "Parolee-Indefinite"** The student is eligible for aid if paroled into the U.S. for at least one year. The SAVE response will include Pending Applications or DHS Comments sections indicating one of the documents mentioned in the "Persons paroled into the U.S. for at least one year" section above.
- **"U.S. Citizen"** Third-Step Verification is for verifying immigration documentation for eligible noncitizens. If the student provided U.S. citizen documentation, do not complete third-step verification. If you accidentally submitted U.S. citizen documentation to SAVE, proceed with verifying the student as a U.S. citizen as instructed in the "U.S. Citizenship Match with the SSA" section earlier in this chapter.
- **"Cuban/Haitian Entrant"** Before submitting documentation for these students through SAVE, click the "Cuban-Haitian Entrant" button under the "Additional Requests" section. A Cuban/Haitian Entrant student may be eligible without this response so you must also check the "Cuban/Haitian Immigration Details" section of the response. An eligible student will have the comment, "Applicant is a Cuban/Haitian Entrant."
- **"American Indian born in Canada"** For details, see the Jay Treaty section earlier in this chapter.
- **"Kickapoo Tribe of Oklahoma and Kickapoo Traditional Tribe of Texas"** If this response is received, the financial aid administrator must contact the Department by emailing applicationsystemsdivision@ed.gov.
- **"VAWA Self-Petitioner"** Before submitting documentation for these students through SAVE, click the "VAWA"

button under the "Additional Requests" section. A student may still be eligible for VAWA status without this response, so you must also check the Victim of Abuse section of the response. See the information for battered immigrations-qualified aliens earlier in this document for additional guidance. If you have questions about VAWA status, contact applicationsystemsdivision@ed.gov.

Ineligible Statuses:

Each of the following statuses are by themselves insufficient to make a student eligible for *Title IV* funds. If the SAVE response is an eligible status, followed by an ineligible status (for example, Lawful Permanent Resident - Employment Authorized), ignore the ineligible status portion of the response. Unless an eligible status is also submitted, or the student can provide other documentation that can be confirmed by the USCIS, students with the following types of status are not *Title IV* eligible:

- **"Employment Authorized"**
- **"Not Employment Authorized"**
- **"Application Pending"** In the majority of cases, a student with only a pending application for an eligible noncitizen status will not be eligible for *Title IV* aid. The student must have documentation showing that their status is approved in order to be considered eligible.
- **"Nonimmigrant"** – Except in the case of a victim of human trafficking (T-Visa). See *Victims of human trafficking* section for more information.
- **"Deferred Action for Childhood Arrivals (DACA)"**
- **"Family Unity"**
- **"Temporary Protected Status (TPS)"**
- **"Deferred Action Status"**
- **"Withholding of Removal"**
- **"Document Appears Altered/Counterfeit."** Notify the student that unless corrective action is taken with the USCIS, the case will be submitted to the Office of Inspector General (OIG). Until this is resolved, no further aid may be disbursed, awarded, or certified. If the student does not take corrective action in a timely manner, you must report the case to the OIG (part of which will include resubmitting the document).
- **"Unable to verify."** DHS-USCIS was not able to verify the student's status/category based on the documentation provided. Carefully read the SAVE response and the DHS Comments section to determine why the student's status could not be verified and proceed according to the information provided, including any requests by SAVE to institute additional verification. For example, SAVE may indicate:
  - **Resubmit request with both sides of the applicant's immigration document.** Click the "Still not sure? Institute Additional Verification" link or perform the "Resend Record to Matches" process in the FAFSA Partner Portal (formerly FAA Access to CPS Online) and resubmit the student's immigration documents through SAVE with copies of both sides of each document.
  - **Applicant's Immigration document is illegible.** Resubmit the student's immigration documents with higher quality copies of the original documentation.

If you see the "Resubmit Doc" response, this means that this case is available for you to submit the student's immigration documentation for third-step verification. If you have questions about how to proceed, contact applicationsystemsdivision@ed.gov and provide a brief description of the issue and the student's DHS Case Number.

Student Rights

You must allow the student at least 30 days from the time you receive the SAVE response to provide documentation of their immigration status/category. During this period and until the results of the third-step verification are received, you can't deny, reduce, or terminate aid to the student. Unless you can determine that the documentation doesn't support an eligible noncitizen status/category, you must submit the student's immigration documents within ten business days of receipt. If the documentation supports the student's status as an eligible noncitizen, and if at least 15 business days passed since the date on which the documentation was submitted to the USCIS, you can disburse aid to an otherwise eligible student pending the USCIS response.

Your school isn't liable if you erroneously conclude that a student is an eligible noncitizen, provided that you had no

conflicting data on file and you relied on:

- a FAFSA Submission Summary or ISIR indicating that the student meets the requirements for federal student aid;
- a USCIS determination of an eligible immigration status/category in response to a request for third-step verification; or
- an immigration document, submitted by the student, that supports an eligible status/category, if the USCIS did not respond in a timely fashion.

The student (or parent borrower of a Direct PLUS loan) is liable for any *Title IV* funds received if they are ineligible. If you made your decision without having one of the documents above, your school is held responsible for repaying *Title IV* funds to the Department. Your school should establish procedures to ensure due process for the student if *Title IV* funds are disbursed but the aid office later determines (using third-step verification) that the student isn't an eligible noncitizen.

The student must be notified of their ineligibility and given an opportunity to contest the decision by submitting to your school any additional documents that support their claim to be an eligible noncitizen. If the documents appear to support the student's claim, you should submit them to USCIS using third-step verification. You must notify the student of your office's final decision based on the third-step verification results.

For every student required to undergo third-step verification, you must furnish written instructions providing:

- an explanation of the documentation the student must submit as evidence of eligible noncitizen status or category;
- your school's deadline for submitting documentation (which must be at least 30 days from the date your office receives the results of the primary confirmation);
- notification that if the student misses the deadline, they may not receive *Title IV* funds for the award period or period of enrollment;
- information about the website: https://www.uscis.gov/sites/default/files/document/fact-sheets/Records-Fast-Facts-for-Benefi-Applicants.pdf, which provides the applicant information about correcting their immigration records so that they can obtain an accurate match for purposes of determining eligibility for Title IV Student Financial Assistance Programs; and
- a statement that you won't decide the student's eligibility until they have a chance to submit immigration status documents.

Documenting Immigration Status in Later Award Years

There are several cases in which **you must document** a student's immigration status/category in a subsequent award year if that student is not confirmed as an eligible noncitizen on the FAFSA Submission Summary/ISIR. For example, a student who presented a **Temporary Form I-551** in a prior award year should have received a permanent Form I-551 by the next year and shouldn't still have a temporary card. You should refer the student to USCIS to obtain a permanent Form I-551 or an updated endorsement on the previous card.

You must also document the eligible noncitizen status/category each award year for a **conditional permanent resident, a refugee, a Cuban-Haitian entrant, or a person granted asylum**. Students in any of these categories may have been redesignated to lawful permanent-resident status or may have had their status/category revoked or terminated. You will have to send the documents for third-step verification if the student's status or category isn't confirmed through the DHS match. Also note that VAWA prima facie status generally expires after 1 year, and that parolees can potentially become Lawful Permanent Residents if their Form I-485 is approved.

You don't have to document a student's eligible noncitizen status in subsequent award years if you've documented that the student is:

- a U.S. citizen or national;
- a citizen of the Freely Associated States;
- a lawful permanent resident and has Forms I-551 or I-151; or
- an eligible noncitizen, as indicated by the SAVE response for the previous award year, the student was an eligible noncitizen and the documents supporting the status in question have not expired.

You must also have no conflicting information or reason to doubt the student's claim of having eligible noncitizen status.

Also note that you must have confirmed the status in a previous award year. You may disburse aid without the USCIS response if the USCIS doesn't respond in time for that award year, but you can't count that lack of response as confirmation for the following year.

Exclusion from subsequent confirmation

34 CFR 668.133(b)

Procedures when ineligibility is determined after disbursement

34 CFR 668.136(c)

Replacing Lost DHS Documents

If a student can't locate their official USCIS documentation, the student must request that the documents be replaced because noncitizens who are 18 years and older must have immigration documentation in their possession at all times while in the United States. Requests for replacement documents should be made by the student to USCIS. Instructions for replacing documents can be found on USCIS' website or by calling the USCIS Contact Center.

The student may be asked to complete a **Form I-90, "Application to Replace Permanent Resident Card" or a Form I-102, "Application for Replacement/ Initial Nonimmigrant Arrival-Departure Document**." PDF versions of these forms can be downloaded from the USCIS website at _uscis.gov_. A temporary I-94 may be issued while the replacement documents are pending. If the student needs to replace other documentation, they should go to _uscis.gov_ or contact the USCIS Contact Center.

In cases of undue hardship, where the student urgently needs documentation of their status/category, the _Freedom of Information Act (FOIA)_ allows them to obtain photocopies of the documents from the USCIS District Office that issued the original documents. The student can submit a Form **G-639** to make this request or can request the records online.

A naturalized U.S. citizen student who lost documents or surrendered them when entering prison is responsible for getting copies of them so you can verify their status. You can request copies of immigration documents directly from penal institutions at the request of the student.

# Examples of U.S. Citizenship and Eligible Noncitizen Documents

Some common documents used to demonstrate citizenship and status/category of eligible noncitizens are shown below. Note that not all documents shown satisfy citizenship requirements in all cases. See the specific notes on each document shown, and also refer to the discussion of citizenship requirements described in detail earlier in this chapter.

U.S. Passport

Can be used to document citizenship for citizens born in the United States or abroad.

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

expiration date.)
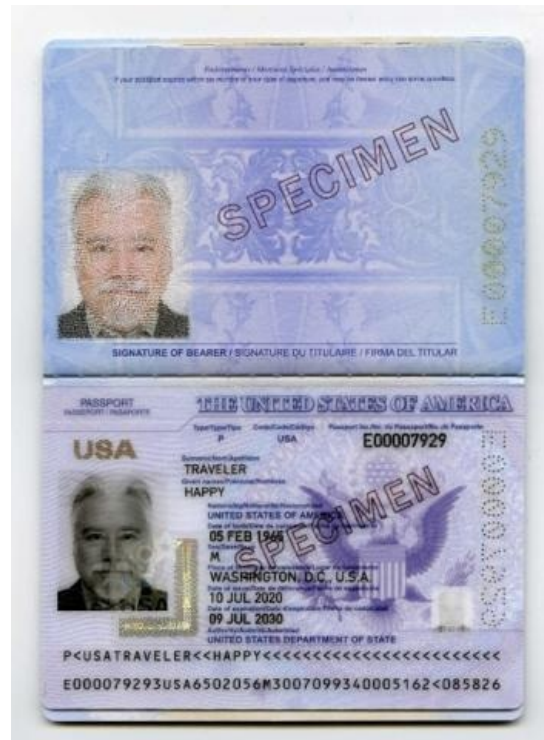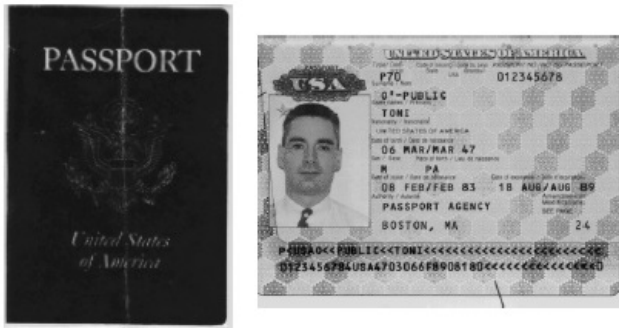
U.S. Passport Card

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.
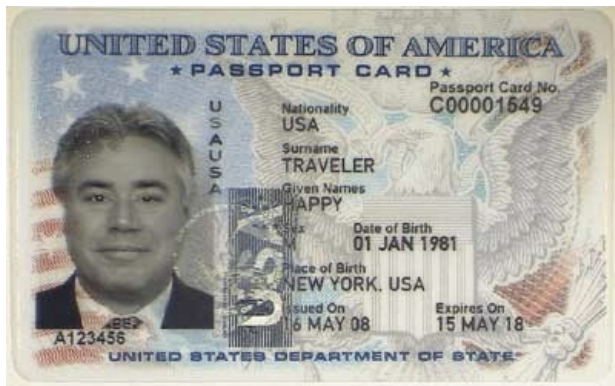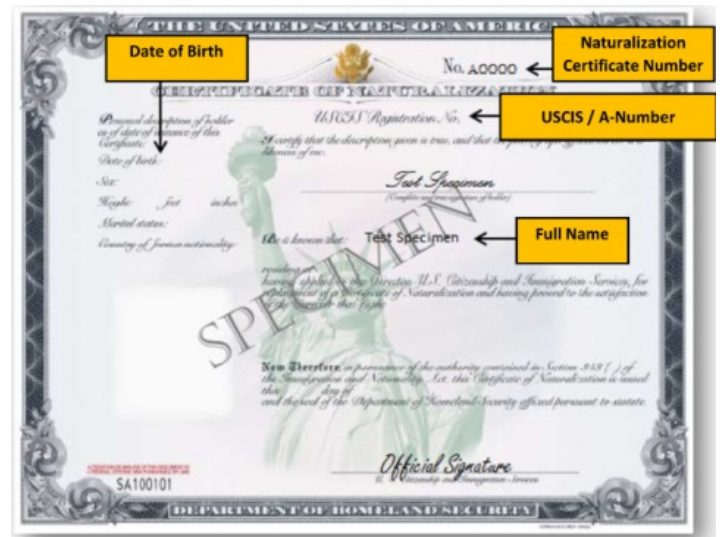
Certificate of Naturalization

The Certificate of Naturalization is issued to naturalized U.S. citizens. USCIS and its predecessor, the U.S. Department of Justice Immigration and Naturalization Service (INS), have issued several versions of this document. A revised version of the Certificate of Naturalization (Form N-550) was created in 2018.

All previously issued certificates remain valid.

The Form N-570 is a replacement certificate issued by U.S. Citizenship and Immigration Services when the original Certificate of Naturalization is lost, mutilated, or destroyed, or when the individual's name has legally changed.

USCIS and INS, have issued several versions of this document. All previously issued certificates remain valid.

- Date of Birth
- Naturalization Certificate Number
- USCIS / A-Number
- Full Name

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.

The image shows a Certificate of Citizenship (No. AS000017) with the following labeled fields:
- Certificate of Citizenship Number
- Alien number/USCIS number
- Date of Birth
- Full name (JOHN JOSHUA KINWWWG)

Certification of Birth Abroad

Issued to U.S. citizens born abroad. Must have embossed seal of the State Department.

Consular Report of Birth Abroad of a Citizen of the United States of America

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

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: https://i94.cbp.dhs.gov/I94/#/home. The website allows you to look up I-94 student data, if the student grants you permission to do so.

For lawful 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 with the proper information as described for Refugee, Asylum Status, Conditional Entrant (before April 1, 1980), Parolee, or Cuban- Haitian Entrant.

I-94 Arrival-Departure Record

USCIS Form I 797A "Tear Off Form I-94"

USCIS issues this document to an applicant as a replacement Form I-94. This typically means that USCIS approved an applicant's change or extension of status/category so they can legally continue to remain in the United States.

United States Travel Document

(front cover) This contains a Reentry Permit (Form I-327) or a Refugee Travel Document (Form I-571). It is used by lawful permanent residents, refugees, and asylees.

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 Form I-551 and as valid documentation for establishing aid eligibility.

I-571 Refugee Travel document

Contained in the U.S. Travel document, the Form I-571 helps document the status of refugees.

Re-entry Permit

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

CBP I-94 Website Printout

Travelers have access to their electronic Form I-94 via DHS's I-94 website. The website printout serves the same purpose as any other Form I-94. A sample of what the printout looks like is shown here.

Lawful 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

(front and back) Issued prior to June 1978 to lawful permanent residents. Form I-151 is no longer accepted by USCIS as evidence of permanent residence, though it may be used to receive *Title IV* funds.

Resident Alien Card

(two versions, front only) The Form I-551, Resident Alien Card is a revision of the Alien Registration Receipt Card. 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.

(1989)

Permanent Resident Card

(front only for older versions, front and back for the current version) The Permanent Resident Card (Form I-551) was introduced in December 1997 and revised in 2004 and 2010. The current version has returned to using green in the design of the front of the card.

Form I-766, Employment Authorization Document

To reduce the risk of fraud and counterfeiting, USCIS redesigns the Employment Authorization Document (EAD) card every three to five years. Introduction of new EAD designs does not mean that previous designs are invalid. Both current and previous cards remain valid until the expiration date shown on the card (unless otherwise noted such as through an automatic extension of the validity period of the EAD indicated on a Form I-797, Notice of Action, or in a Federal Register notice).

NSLDS Financial Aid History

Students who have previously attended other colleges may have a financial aid history that affects their eligibility for FSA funds at your school. You can review a student's financial aid history by using the National Student Loan Data System (NSLDS) For Financial Aid Professionals online at https://nsldsfap.ed.gov; for questions call 1-800-999-8219. NSLDS will also help you track changes to the student's financial aid history through the Postscreening and transfer student monitoring processes.

A student or parent generally isn't eligible for *Title IV* funds if they are in default on a Direct Loan, FFEL Program Loan, or Perkins Loan or if they owe an overpayment on a Pell, TEACH, IASG, or FSEOG grant and have not made a repayment arrangement for the default or overpayment. Also, for a parent to receive a PLUS Loan, neither the parent nor the student may be in default on a Direct Loan, FFEL loan, or Perkins Loan or owe an overpayment on a Pell, TEACH, IASG, or FSEOG grant (though a parent in default on a loan does not make a student ineligible for *Title IV* aid). Exceptions to these general rules are noted in the discussion below.

Although there is a limited provision described in chapter 1 for regaining eligibility for *Title IV* aid on defaulted loans during the Fresh Start period, someone applying for *Title IV* funds must normally certify that they aren't in default on any Direct Loans, FFEL Program loans, or Perkins Loans and don't owe an overpayment on any Pell, TEACH, IASG, or FSEOG grant, or that they have made satisfactory arrangements to repay the overpayment or default. This certification statement is printed on the Free Application for Federal Student Aid (FAFSA). Parent PLUS borrowers make this certification on the Direct PLUS Loan Master Promissory Note (MPN). When reporting loans eligible for treatment under the Fresh Start Initiative, you should not change existing loan statuses, effective dates, or interest rates in NSLDS.

A student is also ineligible if they inadvertently exceed annual or aggregate loan limits. When this occurs, you must identify the loan(s) that resulted in the overborrowing and discuss the overborrowing with the student. The student can regain eligibility by repaying the extra amount borrowed or making arrangements, satisfactory to the loan holder, to repay it. See Dear Colleague Letter [GEN-13-02](#) and *Volume 8* for more details.

A student is ineligible if their property is subject to a judgment lien for a debt owed to the United States, and a parent can't receive a parent PLUS loan if either the student or parent is subject to such a lien. For example, if the Internal Revenue Service (IRS) has placed a lien on a student's property for failure to pay a federal tax debt or make satisfactory arrangements for repayment, the student would be ineligible for federal student aid.

A student who has been convicted of, or has pled no contest or guilty to, a crime involving fraud in obtaining *Title IV* funds must have completely repaid the fraudulently obtained funds to the Department or the loan holder before regaining aid eligibility. You don't need to proactively collect certification from each student but you must restrict eligibility, as appropriate, if/when you become aware of fraud which has not been completely repaid.

When the FAFSA form is processed, the FAFSA Processing System (FPS) matches the student against the National Student Loan Data System (NSLDS) to see if they are in default, owe an overpayment, or have exceeded the loan limits. The FPS doesn't perform any matches to determine whether or not the student is subject to a judgment lien for a federal debt, and you aren't required to check for such liens. The FPS also doesn't check for fund fraud, however, if you know that the person in question is subject to such a lien or has committed fund fraud, you can't pay them *Title IV* funds.

NSLDS does not match Parent PLUS applicants against data in NSLDS. For more information about Parent PLUS applicants and default, see *Volume 8*.

Judgment Lien (Volume 1, Chapter 3, Example 1)

When a student provides their parents' tax return to the aid administrator, the financial aid administrator notices that the parents reported business income on their federal tax return but didn't report a business asset on the FAFSA form. The student explains that they didn't report the business as an asset because there's a lien against the business for a federal loan. The aid administrator tells him that the asset must still be reported, and also that his parents won't be able to borrow a PLUS Loan as long as they are subject to the lien.

Loans in NSLDS

The following current types of loans are listed in NSLDS:

- Direct Subsidized Loans and Direct Unsubsidized Loans
- Direct PLUS Loans (for parents or for graduate/professional students)
- Direct Consolidation Loans

The following loan types from earlier programs also appear in NSLDS:

- Federal Stafford Loans (subsidized and unsubsidized)
- Federal PLUS Loans
- Federal Perkins Loans
- Federal Consolidation Loans
- Federally Insured Student Loans (FISL)
- Guaranteed Student Loans
- Supplemental Loans for Students (SLS)
- National Direct Student Loans and National Defense Student Loans (predecessors of Perkins Loans)
- Income Contingent Loans (ICL)

Financial aid history

34 CFR 668.19, Dear Colleague Letter GEN-96-13

Loan limits and eligibility

See *Volume 8* for loan limits

HEA Sec. 484(f), 34 CFR 668.32(g)(2), 668.35(d),

DCL GEN-13-02

DCL GEN-21-03

Federal default and debt

HEA Sec. 484(a)(3), 484(f), 34 CFR 668.32(g), 34 CFR 668.35

DCL GEN-22-13

Resolving Grant Overpayments

Because Pell Grants have priority in packaging, aid overpayments can often be resolved by adjusting other types of aid in the package. If necessary, you can also adjust later grant payments for the same award year. But if a student receives more grant money than they are eligible for and the excess can't be offset, the student must return the overpayment. As

noted at the beginning of the chapter, a student with an outstanding overpayment is ineligible for aid until they repay it or make satisfactory repayment arrangements. See *Volume 4*, Chapter 3 for a complete discussion of resolving overpayments and overawards.

NSLDS Match

To help you identify students with problems such as defaulted loans or overpayments, the FPS matches the student against the NSLDS database to obtain their financial aid history. **You must resolve any conflicts between NSLDS and other information you have about the student before disbursing *Title IV funds*** (for example, if NSLDS shows that a student isn't in default but you have documentation showing that they are in default). The results of the NSLDS match are provided on the FAFSA Submission Summary and Institutional Student Information Record (ISIR) (referred to as "output documents") on the NSLDS Financial Aid History page. As with other matches, an FPS "C flag" code next to the student's Student Aid Index (SAI) indicates problems that must be resolved.

Once an overpayment is reported to NSLDS, the student's future FAFSA Submission Summary/ISIR will show that they have an overpayment. The financial aid history section of the FAFSA Submission Summary/ISIR will have information on the overpayment, including whether the student has made satisfactory repayment arrangements.

See *Volume 4* of the [FAFSA Specifications Guide](#) for the complete tables of NSLDS match results.

Successful Match

The FAFSA Submission Summary and ISIR will contain the NSLDS financial aid history only if the student's identifying information matches the database and there is relevant information for the student in the database. If the student has no defaults or overpayments or has made satisfactory repayment arrangements on a defaulted loan, 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 indicates that the student has defaulted loans, owes an overpayment, or both. You will need to document that the problem has been resolved before disbursing aid. Note that for "real-time" processing—if a student uses Corrections on the Web or an aid administrator uses the FAFSA Partner Portal (formerly FAA Access to CPS Online)—the FPS does not match against the NSLDS database (except when a school is added), but the output document will show NSLDS data from the last transaction that did match against NSLDS. The ISIR might not, therefore, reflect the most current information.

Resolving Conflicting Information in NSLDS

As noted above, you must resolve any conflicts between NSLDS and other information you have about the student before disbursing *Title IV* funds. If you can document that the student is eligible for FSA funds despite the information shown on NSLDS, you may award and disburse aid. For example, if the NSLDS Financial Aid History page of the FAFSA Submission Summary or ISIR shows that the student has a defaulted loan, but you have obtained documentation from the holder of the loan that the borrower has made satisfactory arrangements to repay the defaulted loan, you may disburse aid. You must retain all applicable documentation supporting the student's eligibility to receive FSA funds in the student's file.

Incorrect NSLDS Data (*Volume 1*, Chapter 3, Example 2)

A first-year undergraduate at School T has never attended college before. When School T receives the student's ISIR, it shows that there was a partial match, and there is some data associated with her SSN. School T checks with NSLDS and learns that a guaranty agency is reporting a loan made years ago (when the student was in elementary school) under her SSN but with a completely different name and date of birth. School T determines that this isn't the student's loan, so she has no financial aid history in NSLDS. Turner also suggests that Lydia provide documentation that the SSN belongs to her so the school can request that NSLDS data be corrected to prevent problems for her later.

Misreported Information on the FAFSA Form (*Volume 1*, Chapter 3, Example 3)

When the school receives Ben's ISIR, it shows that there was a discrepancy with the NSLDS database, so no financial aid history information is provided. The FAA asks Ben if he provided the correct name and date of birth on the application. Ben says he wrote in the wrong month for his date of birth, but his name is correct. The FAA checks the NSLDS database

using Ben's first and last name, SSN, and date of birth. NSLDS shows the correct birth date, but the first name of the student is Warren, not Ben. She checks again with Ben, who explains that Ben is a nickname and Warren is his real name. The FAA determines that the financial aid history associated with the SSN belongs to Ben. If the ISIR was not rejected, the FAA could disburse aid without requiring a correction, but may also wait for the ISIR correction before disbursing aid. Note that race, ethnicity, and gender data will not be reported on the FAFSA Submission Summary or ISIR.

No Data from Match

There are several reasons why an output document may not have financial aid history information: for example, if the application was rejected for lack of a signature or if identifying information was missing. For other cases, you can check the NSLDS flags reported in the "FAA Information" section.

- **Partial match**. If the student's Social Security Number (SSN) is in the NSLDS database but the first name or date of birth don't match what the student reported, no financial aid history will be reported and the output document will have an NSLDS match flag of "7" and a C code. There will also be a comment explaining why the financial aid history isn't given and directing the student to work with the school to resolve any discrepancies. A partial match **requires resolution**; otherwise you won't have information from the Department on defaults and overpayments. If the student originally reported incorrect identifying information, you can have them submit correct information, which will be sent through the match again. If the student did not submit incorrect identifying information, you can call the NSLDS customer support center for help with determining the identifiers associated with the SSN in the NSLDS database. If you discover the discrepancy is due to the student misreporting the name or date of birth on the FAFSA form, you should have the student make a correction. However, you may use the NSLDS record to determine the student's eligibility; you don't need to wait for the corrected data to be reported.

  If you find that the financial aid history associated with the student's SSN doesn't belong to the student, you should assume that the student has no relevant financial aid information. You may request that the data in NSLDS be corrected by providing relevant supporting documents. NSLDS will work with the previous data providers to correct the identifiers. You aren't required to request a correction; however, doing so will prevent the same FAFSA response in subsequent award years.

- **Student not in database**. If a match with NSLDS is completed but there's no information on the student in the database, the output document will comment that the student's SSN is not associated with any financial aid history. You can assume this is correct unless you have conflicting information. If you believe NSLDS should show a loan history, help the student by contacting the appropriate loan servicer or, for a FFEL Program loan, guaranty agency.

- **No relevant history**. If a student's SSN matches a record in the NSLDS database but there's no relevant financial aid history to report, no information will be on the output document, because it isn't needed to determine the student's aid eligibility for the current award year. Conversely, if a student has relevant prior data, for example a prior Pell award, that will appear on the FAFSA Submission Summary/ISIR. The FAFSA Submission Summary and ISIR will have a comment that the student's record was matched with NSLDS but no information was found to print on the NSLDS page.

- **Processing problem**. If there was a problem with the match, the FAFSA Submission Summary and ISIR won't include financial aid history information. The output document will have a C code and a comment explaining that the FPS couldn't determine whether the student has loans in default and will direct them to contact the financial aid administrator. You must get the student's financial aid history before disbursing aid. If the student must make corrections of any kind, their information will go through the match again when the corrections are submitted, and you can use the results of that match to determine eligibility.

Postscreening—Changes After Initial Match

Once you receive the financial aid history through NSLDS, you aren't required to check for changes to the data before disbursing funds to the student. But if you learn from NSLDS or another source that the student was not or is no longer eligible, you must not disburse any more *Title IV* funds and must help make sure the student arranges to repay the aid for which they weren't eligible.

NSLDS uses a postscreening process to let you know when there are significant changes (such as a defaulted loan or an overpayment) to a student's financial aid history. If postscreening identifies changes that may affect the student's eligibility, the FPS will generate new output documents so schools that are listed for receipt of the student's FAFSA

information will automatically be notified. Items that have changed since the last transaction are marked on the output document with a "#" sign, and the reason code for the postscreening will be given.

To help you identify when NSLDS data has changed, the document will include an NSLDS transaction number in the "FAA Information" section with the other match flags. This is the number of the last transaction on which NSLDS data changed, so if you receive an ISIR on which that number is higher than the one on the ISIR you used to determine the student's eligibility, you must review the NSLDS data on the new ISIR to be sure there are no changes affecting the student's eligibility (be aware of the Pell Lifetime Eligibility Used (LEU) limits and codes; for more on Pell LEU, see *Volume 7*). There will be postscreening codes (see The *FAFSA Specifications Guide*, *Volume 4*, for the list) to help determine what changed.

NSLDS Support Center

1-(800)-999-8219

Unusual Enrollment History

There is a flag in NSLDS for students whose pattern of enrollment and/or award history for either Federal Pell Grants or Direct Loans (other than a Direct Consolidation Loan or Parent PLUS Loan) is identified as unusual. You are required to respond to the unusual enrollment history (UEH) status for Pell Grants and/or Direct Loans as described below.

The FPS will flag the UEH on the student's FAFSA Submission Summary/ISIR. A value of "N" requires no action, as it denotes no unusual history. A value of "2" or "3" in the UEH field (represented as FAFSA Submission Summary comment codes 276 and 277, respectively) requires review and resolution by your school (see below). UEH flags 2 and 3 do not necessarily mean the student has improperly received Pell Grants or Direct Loan funds, but it is a sign of unusual activity, for example, receiving Pell Grants and/or Direct Loans at multiple schools in the same semester, or receiving aid and then withdrawing before earning any credit.

To resolve a UEH flag of "2," (FAFSA Submission Summary comment code 276) you must check the student's enrollment and financial aid records to determine if, during any of the four award years prior to the current award year (i.e., 2020-21 , 2021-22 , 2022-23, and 2023-24), the student received a Pell Grant or Direct Loan at your school. If so, no further action is required unless you have reason to suspect that the student in question remains enrolled just long enough to collect student aid funds before withdrawing. In such a case, you must follow the guidance below for UEH flag "3." If not, using information from NSLDS, you must identify all schools where the student received a Pell Grant or Direct Loan for any of the 2020-21, 2021-22, 2022-23, and 2023-24 award years. You must then determine whether academic credit was earned at each of those schools during the award year for which the student received a Pell Grant or Direct Loan. Based on those determinations, you may need to discuss further with the student. See for additional information.

To resolve a UEH flag of "3," (FAFSA Submission Summary comment code 277) you must check the student's academic records to determine if they received academic credit at the schools attended during any one of the four award years prior to the current award year (i.e., 2020-21, 2021-22 , 2022-23, and 2023-24). Using data from NSLDS, you must determine, for each prior attended institution for each student, whether academic credit was earned during the award year in which the student received Pell or Direct Loan funds. Academic credit is considered for this purpose to mean completing one (or more) clock-hour or credit-hour.

For UEH flag 3, if the student **did** earn academic credit at all of the schools previously attended for a relevant award year, no further action is required unless you have reason to believe that the student has had a practice of enrolling just long enough to receive credit balances before withdrawing. In such cases, follow the guidance below for cases when academic credit is not earned (next paragraph). Please note that when reviewing academic completion, you are not required to obtain official academic transcripts. You can use unofficial transcripts, letters from the school, grade reports, etc.

For UEH flag 3, when academic credit is **not** earned at a previously attended school, and, if applicable, at your school, you must obtain documentation from the student explaining why the student failed to earn academic credit. You must

determine whether the documentation provided supports the reasons described by the student and that the student did not enroll only to receive credit balance funds. Acceptable reasons may include personal illness, a family emergency, a change in where the student lived, and military obligations, or an academic complication, such as unexpected academic challenges, or the student having determined that the academic program in question did not meet their needs. You should, to the maximum extent possible, obtain third party documentation to support the student's claim.

In similar fashion to the exercise of professional judgment, you must determine whether the circumstances of the failure of the student to receive academic credit, as evidenced by the student's academic records and documentation, support the continuation of _Title IV_ eligibility. If the student with a UEH flag of 2 or 3 fails to provide compelling reasons and documentation for a failure to receive academic credit for a period for which they received _Title IV_ funds, you must conclude that their eligibility is terminated. Your determination is final and is not subject to appeal to the Department. You must document and maintain a file of reason(s) for the decision for possible review. For the full discussion of your options in using professional judgment, see _Application and Verification Guide, Chapter 5_.

When a student's eligibility is terminated in this way, you must provide information to the student on how they may subsequently regain eligibility, and the student must be given an opportunity to question and appeal the decision **to your school**, consistent with the opportunities to question and appeal similar determinations such as SAP and professional judgment determinations. Since the basis for denial is lack of academic performance, successful completion of academic credit may be considered basis for renewing the student's _Title IV_ eligibility, assuming they are in all other ways eligible for the aid in question. This could include meeting the requirements of the plan that you established with the student, although such a plan is not necessarily required. When a student regains eligibility after losing it in this manner, the student's eligibility is retroactive to the beginning of the current period of enrollment, for Direct Loans, and for all other types of _Title IV_ aid, retroactive to the beginning of the current payment period.

If you approve the student's continuing eligibility, you may choose to require the student to establish an academic plan, similar to the type of plan used to resolve SAP appeals. You may also wish to counsel the student about the Pell LEU limitation and the impact of the student's attendance pattern on future Pell Grant eligibility (see _Volume 7_ and Dear Colleague Letters GEN-12-01 and GEN-12-18).

Resolving UEH Flags in a Subsequent Award Year

When a student receives a UEH flag that includes an award year(s) that was resolved by the reviewing school for a previous award year, that school must determine if there was a change in the schools the student attended for that award year(s). If there were no changes to the schools the student attended, no further action is necessary. If the student attended another school(s) that was not previously reviewed and received Pell Grant and/or Direct Loans at that school(s), the reviewing school must determine if the student earned academic credit at the additional school(s) under review. If the student did not earn academic credit at the additional school(s) under review, the student must provide documentation explaining why academic credit was not earned.

UEH Change for Undergraduate to Graduate Student Progression

UEH is assessed separately for undergraduate enrollment and graduate enrollment. This reduces the number of UEH flags, but still correctly flags students whom the UEH flags are intended to flag for further scrutiny. For more details on UEH and graduate students, see the Electronic Announcement of January 20, 2016.

Unusual enrollment history

Electronic Announcement Jan 10, 2017, DCL GEN-15-05, DCL GEN-13-09

Adding a School and the NSLDS Match

When a school is added after the FAFSA form has been submitted, the FAFSA form goes through the NSLDS match again

rather than being processed in real time. This ensures that the new school receives the latest financial aid history (FAH) on the ensuing transaction. This does not affect schools' responsibility to use transfer student monitoring.

To supplement the ISIR and ensure a student's history is considered, some schools submit a list of students to NSLDS in the Batch Inform File to request FAH of students. See the Transfer Student Monitoring/Financial Aid History processes and batch file layouts posted in the Knowledge Center.

To supplement the ISIR and ensure a student's history is considered, some schools submit entire rosters of FAH requests. See the TSM/FAH processes and batch file layouts posted in the Knowledge Center.

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 2024-25, assess award year periods 2023-24, 2022-23, 2021-22, and 2020-21).

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 page.

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.

Reporting data for students at closed schools

Electronic Announcement Sept 21, 2016

Checking the Financial Aid History for Transfer Students

Before disbursing *Title IV* funds to a transfer student, you must obtain their financial aid history if they may have received aid at another school since your latest ISIR. The NSLDS Transfer Student Monitoring Process (TSM) was established to allow schools to submit a list of students to NSLDS to monitor changes to the student's financial aid history information from the date of the latest ISIR.

If a student transfers to your school during the award year, you'll need to review their NSLDS financial aid history on the ISIR or online at the NSLDS website. From this, you can determine:

- Whether the student is in default or owes an overpayment on a loan or grant;
- The student's Pell Grant and the amount already disbursed for the award year;
- Data pertaining to TEACH Grants, including those converted to loans;
- The student's balance on all loans; and
- The amount and period of enrollment for all loans for the award year.

Usually the financial aid history on the ISIR will be enough, but there are cases where you might check NSLDS for more information. For example, if the student has more than six loans, the ISIR won't have detailed information for some of the loans. If you need that level of detail for those loans, you can get the information from NSLDS. Or, as discussed previously, you might need to use NSLDS to resolve a partial match situation (see "Partial match" in "NSLDS match" section, earlier in this chapter).

- **Transfer student monitoring process.** You must send NSLDS identifying information for students transferring to your school during the award year so that NSLDS can notify you of changes to their financial aid history. You may send information for students who have expressed an interest in attending your school even if they have not yet formally applied for admission.

  Through transfer student monitoring, NSLDS will alert you to any relevant changes in the transfer student's financial aid history—other than the default and overpayment information reported in the postscreening process—that may affect the student's current award(s). There are three steps: inform, monitor, and alert.

  - **Inform.** You **must** identify students who are transferring to your school by creating a list of transfer students on the NSLDS website or by sending the list to NSLDS as an electronic batch file through the Student Aid Internet Gateway (SAIG). You may use either or both methods, and a change in method does not require prior notification to the NSLDS Customer Service Center.
  - **Monitor.** NSLDS will monitor these students for a change in financial aid history that may affect their current awards and alert you when a new loan or grant is being awarded, a new disbursement is made on a loan or grant, or a loan or grant (or a single disbursement) is cancelled. Note that defaulted loans and overpayment information are not monitored in transfer student monitoring, as they are already covered in the postscreening process. If the student has not listed your school in Step Six when filing the FAFSA form, they must add your school for you to receive the postscreening information.
  - **Alert.** Finally, if changes are detected for one or more of your students and NSLDS creates an alert, it will also send an email notification reminder to the address given on the school's TSM and FAH Profile page. Your school's designated contact person may then either review the alert list on the NSLDS for Financial Aid Professionals website or download a batch file, if batch alerts were requested through the SAIG system, in report or extract format, to your SAIG mailbox within SAIG.

- **Timing of the disbursement.** To pay the student, you'll need to have a valid ISIR with an official Student Aid Index (SAI). A valid ISIR will also include the student's financial aid history, and it will also tell you if they are in default or owe an overpayment. The postscreening process will send you another ISIR if the student subsequently goes into or out of default or owes or ceases to owe an overpayment.

  When you initiate transfer monitoring for a student, NSLDS will alert you to significant award changes since you last received an ISIR or alert for the student; this will continue for 30 to 120 days (depending on the monitoring duration you've established) after the enrollment begin date. If you start transfer monitoring before you receive an ISIR for a student, NSLDS will track changes in their financial aid history from the date of your request or a future monitoring begin date you choose.

  The regulations state that a school may not make a disbursement to the student for seven days following the transfer monitoring request to NSLDS, unless it receives an earlier response from NSLDS or checks the student's current financial aid history by accessing NSLDS directly. Therefore, it's usually a good idea to submit the student's name to NSLDS for monitoring as soon as possible, even if they have not yet decided to enroll at your school.

- **Consequences when a transfer student subsequently is found to be ineligible for all or part of an aid disbursement.** If the school has followed the proper procedures for obtaining financial aid history information from NSLDS, it is not liable for any overpayments if the student's situation subsequently changes. However, the student will be liable for the overpayment in this situation, and you may not pay the student further *Title IV* funds until the overpayment is resolved. (See *Volume 4*, Chapter 3 for information on resolving overpayments.)

Transfer Student Monitoring

Through this process for checking the eligibility of transfer students, you may either check the student's financial aid history on the NSLDS website for professionals, or wait seven days (because NSLDS issues alerts weekly) after you've submitted the student's information for monitoring to receive an alert if data has changed. See Dear Colleague Letters GEN-00-12 and GEN-01-09 and: *https://nsldsfap.ed.gov*.

Mid-year Transfer Students

If a student self-identifies as a mid-year transfer student, or if a school has any information that indicates the student might have previously attended another postsecondary school during the award year, the school must request transfer monitoring of the student in NSLDS. A school's coordinating official (see *Volume 2*) is responsible for ensuring that a school does not ignore information the school has about a student's prior or concurrent enrollment.

NSLDS Professional Access

[Information on modernized NSLDS website](#)

Getting the Student's Financial Aid History

There are several ways for you to get a student's financial aid history from NSLDS. You can:

- use the NSLDS Financial Aid History section of the ISIR,
- log on to the NSLDS Professional Access website and access the data online for a student,
- send a batch TSM/FAH Inform file to request aid history data for several students, which will be returned in either extract or report format through the SAIG mailbox. The TSM/FAH processes and batch file layouts are posted on the Knowledge Center.

Effect of Bankruptcy or Disability Discharge

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

Bankruptcy

A student with a *Title IV* loan or a TEACH Grant, Pell Grant, Iraq and Afghanistan Service Grant, or FSEOG overpayment that has been discharged in bankruptcy remains eligible for Direct Loans, Pell Grants, TEACH Grants, FSEOG, and Federal Work-Study (NSLDS loan status code BC for loans that did not default and status code DK or OD for loans that defaulted prior to the bankruptcy discharge). The Bankruptcy Reform Act of 1994 prohibits denial of aid based solely on filing for, or having a debt discharged in, bankruptcy.

A borrower who lists a defaulted loan or grant overpayment in an active bankruptcy claim (NSLDS loan status code DO) is not eligible for further *Title IV* funds unless they provide you with documentation from the holder of the debt stating it is dischargeable. A borrower who includes a non-defaulted loan in an active bankruptcy claim, so that collection on the loan is stayed, is eligible for aid as long as they have no loans in default (including the stayed loan).

Total and Permanent Disability (TPD) Discharges

Loans made under the Direct Loan, FFEL, and Perkins Loan programs, as well as TEACH Grant service obligations, may qualify to be discharged if the borrower or TEACH Grant recipient becomes totally and permanently disabled. Borrowers and TEACH Grant recipients may qualify for TPD discharge based on a qualifying disability determination from the Department of Veterans Affairs (VA), a qualifying disability determination from the Social Security Administration (SSA), or a certification from an authorized health professional. If an individual who received a TPD discharge later wants to receive a new Direct Loan or a new TEACH Grant, certain additional eligibility requirements apply.

Physician's Certification and Acknowledgement (All TPD Discharge Recipients)

If an individual whose prior loan or TEACH Grant service obligation was discharged due to a total and permanent disability later wishes to take out a new Direct Loan or TEACH grant, they must:

1. Obtain a certification from a physician (who must be a doctor of medicine or osteopathy licensed to practice in the U.S.) that they have the ability to engage in substantial gainful activity, and

2. Sign a statement acknowledging that the new loan or the TEACH Grant service obligation can't later be discharged for any present impairment unless it deteriorates so that the individual is again totally and permanently disabled.

The student only needs to obtain the physician certification once; the school keeps a copy of it in the student's file. But the school must collect a new acknowledgment from the student each time the student receives a new loan or TEACH Grant.

The requirements described above apply to all individuals who wish to receive new Direct Loans or TEACH Grants after a prior TPD discharge, regardless of how they qualified for the TPD discharge or when the TPD discharge was granted.

Reinstatement of Previously Discharged Loans or TEACH Grant Service Obligations (Non-Veteran TPD Discharge Recipients Only)

In addition to the two requirements described above, a third requirement applies to individuals who wish to receive new Direct Loans or TEACH Grants within three years after having received a TPD discharge based on a disability determination from the SSA or a medical professional's certification. These individuals are subject to a three-year post-discharge monitoring period that begins on the date the TPD discharge is granted. During this three-year period, the Department monitors discharge recipients for the receipt of new Direct Loans or TEACH Grants. If someone who received a TPD discharge based on an SSA disability determination or a medical professional's certification wishes to receive a new loan or TEACH Grant during the three-year post-discharge monitoring period, the previously discharged loan or TEACH Grant service obligation must be reinstated before the individual can receive the new loan or TEACH Grant.

If a reinstated loan was in default when it was discharged, it remains in default upon reinstatement, and the student must resolve the default (see the Resolving Default Status section below) before receiving the new loan or TEACH Grant, in addition to meeting the other requirements described above.

Note that veterans who receive TPD discharges based on a qualifying disability determination by the VA are not subject to a post-discharge monitoring period, and therefore are never required to have their previously discharged loans or TEACH Grant service obligations reinstated as a condition for receiving new loans or TEACH Grants. However, they must still meet the requirements described above under "Physician's certification and acknowledgement."

There are no restrictions on receiving *Title IV* aid other than Direct Loans or TEACH Grants after a prior TPD discharge.

The NSLDS loan status code for TPD discharges based on VA disability determinations is VA. For TPD discharges based on SSA determinations or a medical professional's certification, the TPD status codes are DI and PD. The DI loan status code indicates that the borrower is still in the post-discharge monitoring period, while the PD status code indicates that the borrower has completed the monitoring period.

Total and permanent disability discharge

34 CFR 685.213 (Direct Loan);

34 CFR 686.42(b) (TEACH Grant);

34 CFR 674.61(b),(c) (Perkins);

34 CFR 682.402(c) (FFEL)

Resolving Default Status

With the exception of the Fresh Start initiative and Fresh Start period (see below), a student in default on an FFEL Loan, any type of Direct Loan, a PLUS Loan, a Stafford Loan, or a Perkins Loan can't receive further Title IV funds until they resolve the default, which they can do in a few ways:

- **Repayment in full (including consolidation)**. A student can resolve a default and regain eligibility for *Title IV* funds by repaying the loan in full (loan status code DP). The student regains eligibility whether repayment was completed voluntarily or involuntarily (examples of the latter include IRS offset and wage garnishment). If the school writes off a regulatorily permissible amount that the student repays (for Perkins Loans), that counts as paying the loan in full (code DC). If a defaulted loan is consolidated, it is also counted as paid in full (code DN). However, if the loan holder writes off the entire loan (except for Perkins Loans), it isn't considered paid in full, and the student remains ineligible for *Title IV* funds (code DW). This condition is normally permanent unless the borrower subsequently pays in full (which is unlikely if the loan holder originally wrote off the loan).

  If a student has paid a defaulted loan in full but the FAFSA Submission Summary and ISIR SAR and ISIR have a comment showing that they are ineligible because of the default, the student must give you documentation proving that the loan was paid.

- **Satisfactory repayment arrangements**. A student in default on an FFEL Loan, any type of Direct Loan, a PLUS Loan, a Stafford Loan, or a Perkins Loan can be eligible for *Title IV* funds if they have made repayment arrangements that are satisfactory to the loan holder. After the student makes six consecutive, full, voluntary payments on time, they regain eligibility for *Title IV* funds (loan status code DX). Voluntary payments are those made directly by the borrower and do not include payments obtained by federal offset, garnishment, or income or asset execution. A student may regain eligibility under this option only one time.

  You can pay the student as soon as you have documentation that they have made satisfactory repayment arrangements. For example, the loan holder may update the code for the loan in NSLDS to DX once six payments have been made; you could then use that as confirmation of the repayment arrangement. You may also use a written statement from the loan holder indicating that the student has made satisfactory repayment arrangements as documentation of the arrangement.

- **Loan rehabilitation**. Although a student can regain eligibility for all *Title IV* funds by making satisfactory repayment arrangements, the loan is still in default. After the student makes more payments, the loan may be rehabilitated, that is, it won't be in default anymore, and the student will have all the normal loan benefits, such as deferments. A defaulted Direct Loan or FFEL Program loan is rehabilitated once the borrower makes nine full, voluntary payments on time (no later than 20 days after the due date) within 10 consecutive months. See *Volume 6* for information on rehabilitation of defaulted Perkins Loans.

On April 6th, 2022, the Department announced that it would eliminate the negative effects of default for borrowers who defaulted on their federal student loans prior to the start of the pandemic payment pause. Among other features, this temporary initiative, called "Fresh Start," will enable borrowers with defaulted federal student loans (including confined or incarcerated students) to regain eligibility for *Title IV* aid, including Federal Pell Grants. More information about Fresh Start is available in the Dear Colleague Letter and Fact Sheet referenced below.

Documenting Loan "Paid in Full" (*Volume 1*, Chapter 3, Example 4)

A student had a Direct Loan as an undergraduate that went into default while they were out of school. When the student applies for financial aid so they can attend graduate school, their ISIR shows that the loan is still in default. The student tells the FAA at the school he wants to attend that they paid off the loan last year. The FAA asks the student to bring in a letter from the Default Resolution Group documenting that the loan has been paid and advises the student that he should ask the Default Resolution Group to update his status in NSLDS.

Fresh Start Initiative

Dear Colleague Letter [GEN-22-13](GEN-22-13)

FSA Fresh Start Initiative Fact Sheet

Satisfactory repayment and rehabilitation

HEA Sec. 428F(a) and (b), 464(h)(1) and (2)

General Provisions: [34 CFR 668.35(a)(2)](#)

[34 CFR 682.200(b)](#), [682.405](#) (FFEL); [34 CFR 685.102(b)](#), [685.211(f)](#) (Direct Loan)

2024-25 NSLDS Loan Status Codes

The codes in the table below are found on FAFSA Submission Summaries and ISIRs.

Code	Status	Eligible for *Title IV* funds
AL	Abandoned Loan	Yes
BC	No Prior Default Bankruptcy Claim, Discharged	Yes, because loan was not in default and was discharged
BK	No Prior Default Bankruptcy Claim, Active	Yes, because loan was not in default
CA	Cancelled (For Perkins means Loan Reversal)	Yes
CS	Closed School Discharge	Yes
DA	Deferred	Yes
DB	Defaulted, then Bankrupt, Active. (Perkins: all bankruptcies; FFELP and Direct Loans: Chapter 13)	No, unless debtor can show that loan is dischargeable. See Dear Colleague Letter GEN-95- 40, dated September 1995.
DC	Defaulted, Compromise	Yes, because compromise is recognized as payment in full
DD	Defaulted, Then Died	No, because if borrower is reapplying, then loan status is in error
DE	Death	No, because if borrower is reapplying, then loan status is in error
DF	Defaulted, Unresolved	No
DI	Disability	Yes, however, disbursing further aid within the 3-year monitoring period may revoke the discharge
DK	Defaulted, Then Bankrupt, Discharged. (Perkins: all bankruptcies; FFELP and Direct Loans: Chapter 13)	Yes, because defaulted loan has been totally discharged
DL	Defaulted, in Litigation	No
DN	Defaulted, Then Paid in Full Through Consolidation Loan	Yes
DO	Defaulted, Then Bankrupt, Active, other. (FFELP and Direct Loans in Chapters 7, 11, and 12)	No, unless debtor can show that loan is dischargeable. See Dear Colleague Letter GEN-95-40, dated September 1995.
DP	Defaulted, Then Paid in Full	Yes, because loan was paid in full
DR	Defaulted Loan Included in Roll-Up Loan	Yes, because the loan was combined with other loans and subrogated to the Department, which reported the same information to NSLDS in one loan. The status of that record will determine eligibility.
DS	Defaulted, Then Disabled	Yes, because loan debt is cancelled, however, disbursing further aid within the 3-year monitoring period may revoke the discharge
DT	Defaulted, Collection Terminated	No

DU	Defaulted, Unresolved	No
DW	Defaulted, Write-Off	No [Note that there is no status code for Perkins write-offs, which are for amounts less than $50; see 34 CFR 674.47(h)]
DX	Defaulted, Satisfactory Arrangements, and Six Consecutive Payments	Yes, assuming student continues to comply with repayment plan on defaulted loan, or is granted forbearance by the GA/ED Servicer
DZ	Defaulted, Six Consecutive Payments, Then Missed Payment	No, loan is back in active default status
FB	Forbearance	Yes
FC	False Certification Discharge	Yes
FR	Loans obtained by borrowers convicted of fraud in obtaining FSA funds	No
FX	Loan once considered fraudulent but is now resolved	Yes
IA	Loan Originated	Yes
ID	In School or Grace Period	Yes
IG	In Grace Period	Yes
IM	In Military Grace	Yes
IP	In Post-Deferment Grace (Perkins only)	Yes
OD	Defaulted, Then Bankrupt, Discharged, other (FFELP and Direct Loans in Chapters 7, 11, and 12)	Yes, because defaulted loan has been totally discharged
PC	Paid in Full Through Consolidation Loan	Yes, because it does not matter if the consolidation loan was a FFEL Program loan or Direct Loan, nor whether underlying loans were in default
PD	Permanently Disabled	Yes, borrower considered permanently disabled
PF	Paid in Full	Yes
PM	Presumed Paid in Full	Yes
PN	Non-defaulted, Paid in Full Through Consolidation Loan	Yes
PZ	Parent PLUS loan for a student who has died	No for the student, yes for the parent
RF	Refinanced	Yes, because defaulted loans cannot be refinanced
RP	In Repayment	Yes
UA	Temporarily Uninsured—No Default Claim Requested	Yes
UB	Temporarily Uninsured—Default Claim Denied	Yes, because the loan is not a federal loan while temporarily uninsured
UC	FFEL: Permanently Uninsured/Unreinsured—Non-defaulted Loan. Perkins: Non-defaulted Loan Purchased by School	Yes
UD	FFEL: Permanently Uninsured/Unreinsured—Defaulted Loan. Perkins: Defaulted Loan Purchased by School	Yes, because the loan is no longer a federal loan
UI	Uninsured/Unreinsured	Yes, does not matter if the loan was in default
VA	Veterans Administration Discharge	Yes
XD	Defaulted, Satisfactory Arrangements, and Six Consecutive Payments	Yes, assuming student continues to comply with repayment plan on defaulted loan, or is granted forbearance by the GA/ED servicer

Chapter 4
Social Security Number

To be eligible to receive FSA funds, each student must provide a correct Social Security number (SSN). To confirm the student's SSN for schools, the Department conducts a match with the Social Security Administration. In this chapter, we discuss the SSN requirement and the match process.

The FAFSA form collects the student's and other contributors' Social Security numbers (SSNs) so that the FAFSA Processing System (FPS) can validate the numbers through a match with the Social Security Administration (SSA). The FPS verifies that the name and date of birth associated with the SSN match the name and date of birth on the application. For the full list of SSN match results, see the 2024-25 FAFSA Specifications Guide.

The FPS won't process an application without a valid SSN as this is a basic requirement of federal student aid eligibility. There is one exception to the SSN requirement for citizens of the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau (collectively known as the Freely Associated States), as they typically are not issued an SSN. Starting with the 2024-25 award year, students from the Freely Associated States and other contributors (parent, parent's spouse, or student's spouse) who do not have an SSN will have their identity verified through the TransUnion Knowledge-Based Identity Verification process. Contributors who are not verified by TransUnion will be directed to the Federal Student Aid Information Center (FSAIC) to send individual identification documents and be verified through an alternative process. A student who doesn't have an SSN or doesn't remember it must contact their local Social Security office for help. The SSN is a key identifier for the student's records and must be listed correctly on the application. We discuss correcting such errors later in this chapter.

Social Security Number (SSN) Match

The FPS prints the SSN match result in the "FAA Information" section of the output document as the SSN Match Flag. If the match is successful, the FPS doesn't match the student's data against the Social Security database on subsequent transactions. However, the FPS will attempt the match again if the student makes corrections to the name, date of birth, or SSN. The FAFSA form will not be processed without a valid SSN for the aid applicant.

Successful Match

If the FPS match with the SSA confirms the name, SSN, and date of birth as reported on the FAFSA form, you may disburse aid to the otherwise eligible student. No comment is provided on the output document when the SSN match is successful. Of course, if you have any conflicting information about the SSN, you must resolve the conflict before disbursing FSA funds to the student. Once a student's SSN is successfully matched with the SSA, the student can't change the SSN.

If a student whose data was successfully matched with the SSA subsequently tries to change their SSN, the FPS won't accept the change. Instead, the student's FAFSA Submission Summary will have a comment telling the student to contact the FAA at their school for help. In the unlikely event that the confirmed SSN is wrong, the student must correct it by filing a new FAFSA form.

No Match on the Social Security Number

You must resolve any problems with the SSA match before disbursing aid. If the SSN is not found in the SSA database, the student's application will be rejected. The student will also receive a comment instructing them to correct their SSN or contact the SSA if they believe the number reported is correct. If it is wrong on the application, the student will have to correct it with the FPS and get a successful match result before they can receive aid.

- **Student reported wrong SSN on the FAFSA form**. If the student's application is rejected because they reported an SSN that is not in the SSA's database, the student must provide the correct SSN to the FPS. This will change the current SSN in the FPS, but it will not change the original, identifying SSN. A student can file a new FAFSA form to correct the original SSN, but since the Common Origination and Disbursement (COD) System will use the current SSN to process records, changing the original SSN is not always necessary. See "Applicants Using Same SSN" later in this chapter. While COD will process using the current SSN, there are other systems, such as EDExpress and some

mainframe and servicer systems, that will still use the incorrect SSN originally reported to identify records. These systems will be able to interface with COD but might still need the original SSN to process records.

While COD will process using the current SSN, there are other systems, such as EDExpress and some mainframe and servicer systems, that will still use the incorrect SSN originally reported to identify records. These systems will be able to interface with COD but might still need the original SSN to process records.

- **FAFSA data entry error**. If a student provided the correct SSN on the paper FAFSA form, but the SSN on the output document is wrong, the student can contact the Federal Student Aid Information Center (FSAIC) at 1-800-4-FED-AID (1-800-433-3243). If the FSAIC confirms that there was a data entry error, it will refer the error to the Department for correction – the student does not need to submit a correction. After the data entry error is corrected, the FPS will produce new output documents. See the *Application and Verification Guide*, Chapter 5 for general information on data entry error corrections.
- **Error in Social Security database**. If the SSN on the FAFSA form is correct but isn't in the Social Security database, the student must contact a local or regional SSA office to correct the database, which is updated daily with information from local and regional offices. The student must report the correct SSN and provide supporting documentation, and report the SSN directly to the SSA office—the Department cannot correct SSA records. Once the database is updated, the student can contact FSAIC and ask them to manually sync their data with SSA. The FPS will then do another SSN match and update the transaction. The student can't simply verify that the SSN is correct; the application will be rejected until the SSA database is updated.

No Match on Name or Date of Birth

The student's application will be rejected if their SSN, or their parent or spouse's SSN, is in the Social Security database but the name or date of birth in the database differs from the information provided. Misspellings or name changes due to marriage are common reasons for an unsuccessful match. The student should make sure that the name and date of birth on the application matches their Social Security card.

This reject is verifiable, which means that the name is questionable but not necessarily wrong. The student can eliminate the reject by entering the right name. If the name or date of birth is incorrect, the student can correct it by logging in to StudentAid.gov and updating their information under their Account Settings. Once SSA returns a successful match and verifies the student's account, the student can then update the information on the FAFSA form by selecting "Make a Correction" and resubmitting. If the name was correct on the application, the student should contact the SSA to update its records. After the student confirms that the SSA has corrected its records, the student must contact FSAIC and ask them to manually sync their data with SSA. The student can also notify their school to force the update. An FAA may update the Resend to Matches field to "Y" in the FAFSA Partner Portal and submit it as a correction so the transaction can go back to SSA for an updated match flag. If the student's name is incorrect in the SSA database, we strongly recommend that they contact the SSA to correct it.

If the student's (or parent's or spouse's) name and SSN match the SSA's database but the date of birth does not, the application will also be rejected, and the student must correct the application using the same process described above for correcting the name. If there is still a disagreement with the SSA record, the student will need to provide the aid office with documentation of their date of birth.

If the student reported the current or a later year as their date of birth, their application will be rejected and the student must correct the error.

Incorrect Name on Application (*Volume 1*, Chapter 4, Example 1)

When the school receives the student's ISIR, the SSN match shows the name on the application isn't the one associated with the SSN in the database. The FAA asks the student to bring in documentation showing their correct name and SSN. The student brings in his Social Security card, and the first name on the card is Jose, not Miguel. The student also has a driver's license showing his first name is Jose. The FAA tells Miguel to correct his name on the FAFSA form to Jose.

Name Change on the SSA Website

If a student legally changes their name because of marriage, divorce, court order or any other reason, they should notify SSA so they can get a corrected card and FPS can resubmit the match to SSA. Students should be directed to the SSA

name change page for instructions on how to update their name.

Contributors with No Social Security Number

Contributors (student, parent, parent's spouse, or student's spouse) who do not have an SSN and are not verified by TransUnion during the StudentAid.gov account creation process will be directed to the Federal Student Aid Information Center (FSAIC) to complete an alternative process to validate their identity. Individuals will be required to submit an attestation and validation of identity form along with their approved identity documentation. If the contributor is completing their own section of the online FAFSA form and doesn't have an SSN, the SSN will be blank and disabled. If the contributor has an Individual Taxpayer Identification Number (ITIN), they should add it to the FAFSA form. If they don't have an ITIN, they should leave that question blank. Contributors without an SSN can create a StudentAid.gov account to access and sign the FAFSA form by following the instructions in the [Electronic Announcement of December 27, 2023](#).

On the paper form, the parent or spouse should enter all zeros (000-00-000) in place of an SSN.

If a student is a resident of the Freely Associated States (Republic of Palau, Republic of the Marshall Islands, or Federated States of Micronesia) and a first-time applicant, they should enter "000" in the first three boxes of the field and leave the remaining six positions blank; FSA will create an identification number to be used for federal student aid purposes. If the student was issued an identification number beginning with "666" when previously submitting a FAFSA form, they should enter that number in the Social Security number field.

Missing Information

No match is performed if the student doesn't sign the FAFSA form or provide a last name or date of birth. The student's FAFSA form will be rejected and the student must submit the missing information.

Although the FPS doesn't conduct the match, the student will receive a comment explaining that the match could not be conducted without the name, date of birth, or signature. The student must submit a correction providing the missing information. When the correction is sent, the information will be sent to the SSA for matching, and you should check the new output document for match results.

Correct Name not in Database (*Volume* 1, Ch 4, Example 2)

The student's ISIR shows that her name doesn't match the one the SSA has on file for her SSN. When the FAA talks to the student, she explains that she recently got married and changed her last name. The student gives the FAA a copy of her marriage certificate. The administrator plans to disburse aid to the student and tells her to reenter her current name and advises her to contact SSA to have its database updated to prevent future problems.

Death Indicator

If the SSA's database shows a death indicator associated with the SSN the student reported, the student's application will be rejected. Students resolve this problem in the same way as problems matching the SSN or date of birth: by contacting the SSA to update their records, then having FPS run the SSA match again.

SSN requirement

HEA Sec. 484(p), [34 CFR 668.32(i)](#), [668.36](#)

Contacting the SSA

Death Master File

The FPS will verify that student SSNs do not appear on a master death file the Department obtains from the SSA. This will be in addition to the date of death match. The FPS will regularly compare its records with those in the master death file. If a match is found, the FPS will resend the student record to SSA. If the SSA does not confirm a date of death for the applicant, the FPS will do nothing further. If the SSA does confirm a date of death, the FPS will send an ISIR to the schools listed on that transaction but will not send a FAFSA Submission Summary to the student.

For full discussion of how to handle *Title IV* aid when a student dies, see *FSA Handbook Appendix B, Required Actions When a Student Dies*.

Applicants Using Same SSN

When one student uses another's SSN, the duplicate SSN flag will be set in the ISIR, and the student's application will likely fail the SSN match, but it will be processed. The student will have to make a correction as described earlier in this chapter.

If a student uses the same SSN **and** first two letters of the last name (together these data are the record identifier) as another student, the FPS will not accept the application because it will assume it to be a duplicate application of the first student. If the student is using the online FAFSA form, they will receive an immediate message with instructions on the proper way to make a correction, or if the student's record identifier is correct and they are trying to apply for aid, instructions on how to proceed. If the student is submitting a paper FAFSA form, they will receive a letter giving them the same information and stating that the application was not processed.

If the student using the correct SSN applied after the other student, they must submit a special "correction application" that they can only get from the Department. It will enable the FPS to accept the student's data instead of treating the application as a duplicate. The first student, who used the wrong SSN, must correct the error by filing a new FAFSA form because the FPS uses the record identifier for students for the entire award year, even if they later change their SSN or last name. If the student simply corrected their SSN, their record identifier would still be wrong.

If the student using the correct SSN applied first, the FPS will have their data, so a correction application isn't necessary. The second student will need to submit a new application.

Both students should keep copies of all output documents, including those from the first FAFSA forms filed. When a student files a correction application or a new FAFSA form, the application receipt date is changed. Because some schools and agencies use this receipt date to determine if the student met a deadline, the student should keep the output documents to show the original receipt date and to show why a later application was necessary.

Contact the FSAIC at 1-800-433-3243 if you believe that a correction application may be needed; one can be mailed to your office or to the student.

Students Using the Same SSN (*Volume 1*, Chapter 4 Example 3)

A student completes an application in January, but uses their brother's SSN instead of their own SSN. When the student gets their FAFSA Submission Summary, they realize that they used the wrong SSN, corrects the FAFSA Submission Summary, and mails it back to the processor. The student can now use their own SSN.

FSA Partner and School Relations Center

Send paper Master Promissory Note packages, Direct PLUS Loan endorser addenda, and Campus-Based signature pages to:

U.S. Department of Education
P.O. Box 1130
Fairfax, VA 22038

or, for overnight & commercial courier,

U.S. Department of Education
4050 Legato Road, #1100
Fairfax, VA 22033