## Resolving 'C' Codes

NeASFAA Fall Training November 5, 2015

## Resolving Veteran's Status

**Comment Codes:** 

162, 173, 180

# Determining Veteran Status for Federal Financial Aid Purposes:

- Student needs to provide a copy of their DD214 to the financial aid office.
  - As long as that the "Character of Service" is other than "dishonorable" the student is eligible to receive aid
  - If the student is on active duty in the U.S. Armed Forces for something other than training, review the FAFSA to determine if a correction is needed in answering the veteran status question.

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## Veteran for FSA purposes:

- If attended U.S. Military Academy or military academy preparatory school who are discharged for anything other than Dishonorable are considered veterans for FSA purposes.
- National Guard/Reservists are considered to be veterans for FSA purposes if they are called to active duty by Presidential order for a purpose other than training.

## Resolving Selective Service Flag

ISIR Comment Codes: 030, 033

## Selective Service Flag:

- How To Resolve C Code:
  - Require student to register if between ages 18-26
    - Can either register through the FAFSA
    - Can register through <u>www.sss.gov</u>
    - Complete form available through post office
  - Document Exemption

## Who qualifies for Exemption?

- Males born before 1960.
- Non-citizens who entered the U.S. after they turned 26 years old
- Non-citizens who entered the U.S. lawfully on a valid visa and remained in the U.S on that visa until after that age of 26
- Transgender males who were assigned the sex of female at birth
- Unable due to hospitalization, incarceration or having been institutionalized
- See FSA Handbook Volume 1 Chapter 5 for additional exemptions

### What kind of documentation is needed?

- Only ask the student to provide an Exemption letter if it is not clear whether he/she was exempt.
  - Example: if a male immigrant can document that he entered the when he 26 or older through Alien registration card or some other entry document.

## Documentation for Determining Exemption:

- Proof of Date of Birth:
  - Passport
  - Birth Certificate
  - U.S Driver's license or state ID
- Proof of Entry into the United States:
  - Entry date stamp on I-94
  - Entry date stamp from passport
  - Letter from USCIS indicating entry date
  - Student Visa
  - Valid U.S. passport stamp on a foreign passport with expiration date (date must be from entry until after the male turned 26)

#### **EXAMPLE:**

- Transgendered student who was flagged with the Selective Service Flag.
- Was assigned a female gender at birth but has since been assigned to the male gender.
- Besides exemption letter what type of documentation could you ask for instead?

# What Happens When the Student Has Failed to Register?

- Males over 26 are initially flagged as ineligible for aid if they failed to register with Selective Service
- Student may still be able to receive if they can document that he did not knowingly and willfully fail to register.

# Determining if Failure to Register was Knowing & Willful:

- Student must write to Selective Service to get a status information letter addressing his failure to register.
- If Selective Service issues a 'general exemption' letter he is exempt and can receive FSA funds.
- If student receives any other type of letter then the school must make determination if it was knowingly and willingly.

# When making determination consider the following:

Where did the student live between the ages of 18-25. (i.e., Was he living abroad?)

- Whether the student makes the claim that he thought he registered.
- Why the student claims he was not made aware of the requirement.
- Who makes the decision on your campus?

## Resolving Defaulted Loan Status

**Comment Codes:** 

124, 132, 134, 135, 136

## Reestablishing Eligibility due to Defaulted Loans

- (DP) Defaulted but repaid in full
- (DC) Student paid off an agreed portion of the loan and the loan holder wrote off the remaining balance\*
- (DN) Paid Defaulted loan through consolidation
- (DX) Student has made satisfactory arrangements and made 6 consecutive payments.\*\*
- (DA) Loan Rehabilitation regains non-defaulted status\*\*\*
- Loan Status and Eligibility Determination Chart if FSA Handbook Volume 1, Chapter 3, 1-62 & 1-63

## Acceptable Documentation if ISIR shows defaulted:

- NSLDS history updated to show an eligible status
- Written statement from loan holder
- Updated ISIR
- Make sure all defaulted loans are taken care of; student may have multiple loan holders.

# Unusual Enrollment History (UEH)

## What is UEH?

- The First Unusual Enrollment History Guidance was issued in Dear Colleague Letter 13-09.
- Regulations expanding the Unusual Enrollment History guidance can be found in Dear Colleague Letter GEN-15-05
- The UEH Flag is intended to address possible abuse in the Title IV student aid programs.

## What does the UEH Flag consider?

- Students that received the Pell Grant and/or a Federal Direct Loan (this does not include a Direct Consolidation Loan or a Parent PLUS Loan) at three or more institutions during the review period.
- The review period for 2015-2016 is the four prior award years:
  - · 2011-2012
  - · 2012-2013
  - · 2013-2014
  - · 2014-2015

## How do I know who is selected?

- The UEH Flag on the ISIR indicates whether the student has an unusual enrollment history. UEH Flag values of '2' or '3' generate a 'C' Code.
- UEH Flag #2 is indicated by comment code 359
- UEH Flag #3 is indicated by comment code 360

## How do I resolve UEH Flag #2?

- The institution must review the student's enrollment and financial aid records to determine if, during the four award year review period the student received a Pell Grant and/or Federal Direct Loan at the institution that is performing the review.
- If, YES, no additional action is required\*
- If, NO, the institution must follow the guidance provided for UEH Flag #3.

## How do I resolve Flag #3?

- Review NSLDS history to determine the institutions attended, the award year, and if the student received a Pell Grant and/or Direct Loans.
- Review academic transcripts from each of the institutions attended where the student received a Pell Grant and/or Direct Loans to determine if the student earned academic credits.

<sup>\*\*</sup>Academic credit is considered to have been earned if the academic records show that the student completed **one** or more credit hours or clock hours, Per FSA Handbook Volume 1 Chapter 3 Page 54

# Did the student earn academic credit at each institution in which they received aid?

- YES, no additional action is required.
- NO, the institution must obtain documentation from the student explaining why the student failed to earn academic credit. If this documentation does not provide an acceptable explanation the institution must deny the student any additional Title IV assistance.
  - The institution must then make determination of student's eligibility based on the explanation and documentation provided.

#### **Resolving UEH FLags**

NO FURTHER ACTION REQUIRED NO Did the student receive Does your school have a Pell Grant and/or reason to believe the **UEH FLAG 2** Federal Direct Loan at YES student remains enrolled your school within the only long enough to receive a TIV Credit Refund? past FOUR award years? Did the student receive For EACH school the student a Pell Grant and/or received a Pell Grant and/or Federal Direct loan at **UEH FLAG 3** Federal Loan, did the YES ANY school during the student receive academic past FOUR award credit? years?\* Does your school have reason to believe the NO FURTHER student remains enrolled NO ACTION REQUIRED only long enough to receive a TIV Credit NO Refund?\* Your school must obtain documentation from the student explaining his/ her enrollment pattern, and if applicable, why the student did not earn any academic credit. Supporting documentation must be reviewed to determine federal aid eligibility

\*Past FOUR award years does NOT include the current academic year. For example, the last four years for a UEH Flag on the 2015-2016 ISIR are: 2011-12, 2012-13, 2013-14, and 2014-15.

\*\*Academic credit is considered earned if the academic records show that the student completed ANY credit or clock hours during the applicable award year.

## **Case Studies**

#### Case Study 1

- Step 1. Determine if UEH Flag 2 or UEH Flag 3
  - Student has been has UEH Flag 2
- Step 2. Pull NSLDS history to determine which schools the student has received aid from in the past four academic years.
  - 2011-12 N/A
  - 2012-2013 Had Loans at CSM
  - 2013-14 Had Loans at MCC
  - 2014-2015 Had Loans at Doane
- Is there any further action required?

#### Case Study 2

- Step 1. Determine if UEH Flag 2 or UEH Flag 3
  - Student has been has UEH Flag 3
- Step 2. Pull NSLDS history to determine which schools the student has received aid from in the past four academic years.
  - 2011-2012 No Federal Aid
  - 2012-2013 Received aid from Kaplan
  - 2013-2014 Received aid from Kaplan and UNL
  - 2014-2015 Received aid from UNL and Doane

- Step 3. Did the student earn academic credit?
  - 2011-2012 N/A
  - 2012-2013 Earned academic credits from Kaplan
  - 2013-2014 Fall earned credits at Kaplan
    Spring earned credits at UNL
  - 2014-2015 Fall Earned NO credits at UNL
  - Spring/Summer earned credits at Doane

What is the next step to determine eligibility?

### Discussion:

- Are all students whether UEH 2 or UEH 3 required to complete any specific forms?
- Do you require the student to provide academic transcripts or do you contact your Admission/Registrar office directly to obtain?
- Do you require third party supporting documentation?
- What is your policy on regaining eligibility?
- Do you have a form the student needs to complete as part of the review/appeal process?

# Resolving Immigration & Citizenship Issues

Comment Codes: 046, 105, 146, 141, 142, 144

## U.S. Citizen or U.S. National Issue

- Comment Code 146
- The SSA could not confirm you are a U.S.
  Citizen. Please provide your Financial Aid Office with documentation of U.S. Citizenship.
- Student must present original documentation to a designated official at their institution.

## U.S. Citizen or U.S. National Issue

- If the student cannot easily provide documentation in person, he/she can submit electronic images or paper copies to the school
- If the school allows for copies to be provided, a process should be put into place to ensure the student is submitting an exact copy.

## Acceptable Documentation:

- Examples of (not all inclusive):
  - Birth Certificate showing birth in the U.S.
  - U.S. Passport
  - Wallet-sized Passport issued by U.S. State
    Department for travel between the U.S., Canada,
    Mexico, Bermuda the Caribbean.
  - Form FS-240 Confirmation of Birth Abroad
  - A Certificate of Naturalization issues by USCIS
  - A Certificate of Citizenship

## Discussion

- What is your financial aid policy if regards to who is considered a designated official?
- Do you require a notarized affidavit if student is unable to present in person?
- Do you go ahead and package student's financial aid but don't disburse until documentation is provided?
- How do you communicate to the student the required documentation?

## Eligible Non-Citizen

ISIR Comment Codes: 046, 146, 105, 141, 142, 144

## Confirmation of Eligible Non-Citizen Status:

- Comment Code: 105, 046 and 109
- The United States Citizenship & Immigration Services (USCIS) of the Dept of Homeland Security has not confirmed your immigration status associated with the requirements of eligibility for the financial assistance for which you have applied. You must submit proof to your school of your noncitizen immigration status.

## Resolution Required:

- Student must provide documentation to the school regarding eligible non-citizen status.
- School must wait 10 business days for another system generated ISIR with updated Secondary Confirmation match.
- If there is no ISIR update after 10 days, the school begins the paper Secondary Confirmation Match by completing Form G845.
- For comment codes 146 and 109 school begins paper secondary confirmation without the 10 day waiting period.\*

## Paper Secondary Confirmation G-845

- G-845 may be required if applicant did not pass secondary DHS confirmation.
- Student must provide unexpired documentation showing that he/she is an eligible non-citizen
- G-845 is not required if you can clearly identify the student is <u>NOT</u> an eligible non-citizen.
- Mail to appropriate field office based on your location.
  - Can be found at: <a href="http://www.uscis.gov/g-845">http://www.uscis.gov/g-845</a>
  - FSA Handbook Volume 1, Chapter 2

### G-845 Form

- Will need to provide 15 digit verification number located on the match flag section of the ISIR.
- Supporting documentation provided by the student must be submitted with the G-845
- USCIS will respond within 21 federal working days upon receipt.
  - If no response after 15 can contact the DHS Case Resolution Team at 877-469-2563.

## **Case Studies**

#### **CASE STUDY 1:**

- ISIR Comment Code 146
- Social Security Administration did not confirm you are a U.S. Citizenship. Please provide your FA Office documentation of your citizenship.
- Student presents expired copy of U.S. passport to designated official at the FA Office
- Is anything else required?

#### **CASE STUDY 2:**

- Comment 146 SSA cannot confirm your citizenship status.
- School requested proof of eligible status.
- Student presented original a current Permanent Resident card to FA Office. Student indicated that he was a U.S. Citizen on the FAFSA.
- What are the next steps?
- Is a G-845 needed?

#### **CASE STUDY 3:**

- Comment Code 046
- USCIS of the Dept of HLS did not confirm you are a noncitizen in an immigration status associated with the requirements of eligibility for financial assistance.
- Student did not pass DHS secondary match.
- Student is a resident of Palau
- What is needed to clear the student to receive federal aid?

## **Questions?**