

## RESOLVING ISIR COMMENTS

**DHS Flag:** The Department of Homeland Security was unable to verify status as a citizen or an eligible non-citizen.

Students claiming to be citizens will have to submit proof of citizenship to the FAO.

Students claiming to be eligible non-citizens will have to submit proof of their status. The FAO will submit a copy of the student's documentation to DHS via the SAVE (Systematic Alien Verification Entitlement) portal. The requirement to submit documentation to DHS may be waived if secondary confirmation was received in the previous year and the documents sent to DHS via the SAVE system have not expired.

**Default, Overpayment, Exceeded Loan Limits and Fraudulently Obtained Funds:**

Students will be instructed to contact the agency listed on the SAR to resolve the particular situation. It will be the responsibility of the student to secure documentation proving resolution of the default, overpayment, exceeded loan limits or fraud situation and to provide a copy of the documentation to the FAO. No Title IV aid will be awarded to the student until the issue has been resolved.

**Social Security Number, Name, and DOB Mismatches:** There are a number of comment codes associated with a student or parent's Social Security Number, Name and Date of Birth. The resolution varies with the specific issue.

For situations where the SSN cannot be matched with the SSA database:

- Student reported wrong SSN – Student will be instructed to file a new FAFSA
- FAFSA processing error – Student will be instructed to call 1-800-4-FED-AID
- Error in the SSA Database – Student will be instructed to contact the SSA office to have information corrected; then resubmit the SSN on the FAFSA (after the SSA updates it)

For situations where the SSN does not match the student's or parent's name and/or DOB:

- Student will need to submit proof of correct name and/or DOB to the FAO

***Note: Although the College will be able to submit most changes to FAFSA information, on occasion it may be necessary for the student to submit changes directly to the CPS. In such cases, the College will notify the student in writing (by email) as to which data items must be corrected by the student and submitted for processing to the CPS.***

No Title IV aid will be awarded until the issue is resolved.

**Unusual Enrollment History:** Beginning with the 2013–14 award year, the U.S. Department of Education added the Unusual Enrollment History Flag to the Institutional Student Information Record (ISIR). According to Dear Colleague Letter GEN-13-09, the purpose of the UEH Flag is to identify instances of potential fraud and abuse of the Federal Pell Grant Program.

Beginning with the 2015-16 year, the Department of Education added Direct Student Loans to the process.

While some students have legitimate reasons for unusual enrollment histories, other students may enroll in post-secondary schools long enough to receive credit balance payments, leave the institutions, and repeat the process at other schools.

Consequently, some Free Applications for Federal Student Aid (FAFSAs) will be flagged for “unusual enrollment history” (UEH) by ED as a result of the student having received federal Pell Grants or Direct Student Loans at multiple institutions in recent years. Flags “2” and “3” require that the current institution review the student’s enrollment history and determine whether or not the student is enrolling only long enough to receive cash refunds of federal student aid.

NOTE: The FAO, in the process of reviewing a student’s UEH flag, will check the National Student Loan Data System (NSLDS) for complete enrollment history (i.e., name of each school attended during the four years prior to the current academic year – the review period – and dates of attendance).

- **How to resolve:** All students with UEH flag 3 and some students with UEH flag 2 (i.e., those that could not be cleared upon first review) will be required to provide their academic transcripts or grade reports from all colleges and universities attended during the review period (if they haven’t already). If official transcripts are not on file with the College and the student must submit to the FAO, unofficial transcripts and grade reports are usually acceptable. However, the FAO may require an official academic transcript from any/all colleges attended during the review period if the unofficial documents submitted are unclear.
  - **Eligibility approved:** If the documentation supports an assertion that the student did not enroll in multiple schools/programs solely to obtain the credit balance payment (i.e., the student earned at least 1 credit at each of the schools attended in the review period), then the student is eligible for additional Title IV funds. The FAO must document its determination in the student's file and process the student's Title IV aid accordingly.
  - **Eligibility denied:** After review of the student’s academic history for the periods indicated, it is determined that Pell Grants were received and credit hours were **not** earned at each institution attended during these award years, the student may be determined ineligible for further federal financial aid.

- **Appealing the ineligibility determination:** if a student has been determined by the FAO to be ineligible for federal student aid on the basis of (or lack of) the above conditions under "Eligibility Denied", he/she may appeal the determination by submitting a typed statement detailing the mitigating circumstances that prevented them from earning credit along with documentation supporting their claim to the FAO.

If the FAO approves the appeal, the student will regain their Title IV eligibility and must adhere strictly to all conditions of their reinstatement.

The conditions are the same as for the SAP appeals:

- Student must make a grade of "C" or higher in each class, and
- The student must not withdraw from any class

The student must adhere to these conditions until back in good standing.

If the FAO denies the appeal, the student is no longer eligible for Title IV aid at the College.

- **Reinstatement of eligibility:** Students whose aid eligibility is denied as a result of the UEH may regain eligibility for Title IV aid by accomplishing the following:
  - Complete at least 12 hours on their own, and
  - No withdrawals (official or unofficial), and
  - Be meeting the College's SAP standards

It is the student's responsibility to inform the FAO when he or she believes they have regained eligibility. The FAO will determine if student actually did regain eligibility.

**Veteran for Financial Aid Purposes:** According to the U.S. Department of Education, a student is a veteran for financial aid purposes if he or she:

- Is currently serving or have engaged in active duty in the Army, Navy, Air Force, Marine Corps, or Coast Guard,
- Is a National Guard or Reserve enlistee *who was called to federal active duty for purposes other than training,*
- Was a cadet or midshipman at one of the service academies, and
- Was released from service under a condition other than dishonorable, or
- Is not a veteran now but will be one by June 30, of the current year.

If a student meets any of the requirements above, he or she will be considered independent for financial aid purposes and will not need to provide parents' information when completing the FAFSA.

Students who indicate they meet one of the requirements above, but for whom ED cannot confirm the status with the VA, will be required to submit a copy of their DD214 (member 4 or "long" copy) to prove their status.

**Bankruptcy:** A student with an FSA loan or grant overpayment that has been discharged in bankruptcy remains eligible for FSA loans, grants, and 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). A borrower doesn't have to reaffirm a loan discharged in bankruptcy to be eligible. The Bankruptcy Reform Act of 1994 prohibits denial of aid based solely on filing for, or having a debt discharged in, bankruptcy.

A student who lists a defaulted FSA loan or grant overpayment in an active bankruptcy claim is not eligible for further FSA funds until they provide the FAO with documentation from the holder of the debt stating it is dischargeable (NSLDS loan status code DO).

A borrower who includes a non-defaulted FSA loan in an active bankruptcy claim so that collection on the loan is stayed, is eligible for aid as long as he has no loans in default (including the stayed loan)

**Discharged Loan:** If a student whose prior loan was discharged due to a total and permanent disability wishes to take out another FSA loan, he or she must submit to the FAO a physician's certification that he has the ability to engage in substantial gainful activity, and he or she must sign a borrower statement acknowledging that the new FSA loan can't later be discharged for any present impairment unless it deteriorates so that he is again totally and permanently disabled.