







CATEGORIES OF CRITERIA

- Criteria Checked by the School
 - Regular student status
 - High school completion status
 - SAP
 - Financial Need
 - Individual Title IV Program requirements
- Criteria Checked via Application Process
 - Citizenship status
 - SSN
 - Selective Service Registration
 - Default and Overpayment
 - Borrowing History
 - UEH

We do it all!



CRITERIA CHECKED BY THE SCHOOL

- Enrollment or acceptance for enrollment in an eligible program at an eligible institution (regular student)
 - Title IV credits only - "If a student is enrolled in courses that do not count toward his degree, certificate, or other recognized credential, they cannot be used to determine enrollment status unless they are eligible remedial courses. This means you cannot award the student aid for classes that do not count toward his degree, certificate, or other recognized credential." - Volume 1, Chapter 1, P 21, 2018-19 FSA Handbook.
- Receipt of a high school diploma, its equivalent, or a high school curriculum in a home school setting that meets state requirements
- No simultaneous enrollment in elementary or secondary school



CRITERIA CHECKED BY THE SCHOOL

- SAP
 - Qualitative (GPA)
 - Quantitative (Pace) - 150% rule
 - Checked either every payment period or once per year
 - Appeal process
- Financial Need
 - COA - EFC = Need
 - Need based programs: Pell Grant, FSEOG, IASG, Work-study, Direct Subsidized Loan
- Program specific requirement examples
 - FSEOG exceptional need requirement
 - TEACH Grant agree to teach requirement



CRITERIA CHECKED VIA APPLICATION PROCESS

- Federal Agencies and Systems used to check criteria
 - Social Security Administration
 - Department of Homeland Security
 - Selective Service System
 - National Student Loan Data System
 - Department of Justice
 - Department of Defense
 - Department of Veteran Affairs



CRITERIA CHECKED VIA APPLICATION PROCESS

- Reject Codes
 - Issues with the student's FAFSA and is rejected by CPS
 - No EFC is calculated
 - Must be resolved and new ISIR received before awarding
- 'C' Codes
 - Issues with the student's FAFSA
 - EFC is calculated
 - Must be resolved before awarding



CRITERIA CHECKED VIA APPLICATION PROCESS

- Citizenship status
 - Citizen
 - Includes Puerto Rico, US Virgin Islands, Guam and Northern Mariana Islands
 - US National
 - Includes American Samoa, Swains Island and United States Minor Outlying Islands
 - Eligible non-citizen

Checked by matches with SSA and DHS.

DHS is looking at the alien registration number ('a' number). If the match isn't made, that's the first thing to check and correct on FAFSA if necessary.



CRITERIA CHECKED VIA APPLICATION PROCESS

- Documentation for Citizenship Status
 - US Passport Card
 - Current or expired
 - US Passport
 - Current or expired but not 'limited' for a short period of time
 - Stamped Non-Citizen National for American Samoa, Swains Island and United States Minor Outlying Islands
- Birth certificate showing birth in US
- Consular Report of Birth Abroad, Certificate of Birth issued by a foreign service post or Certification of Report of Birth issues by US State Department
- Certificate of Naturalization
- Certificate of Citizenship



CRITERIA CHECKED VIA APPLICATION PROCESS

- Types of eligible non-citizens
 - Lawful permanent residents of the US
 - Citizens of the Federated States of Micronesia and the Republics of the Marshall Islands and Palau
 - Conditional resident aliens
 - Refugees and Asylees
 - Paroled into the US for a least one year
 - Cuban-Haitian immigrants
 - Conditional entrants
 - Victims of Human Trafficking
 - Victims of Domestic Violence and eligible for assistance under VAWA
 - Persons considered lawfully admitted for permanent residence under Jay Treaty of 1794



CRITERIA CHECKED VIA APPLICATION PROCESS

- Documentation for eligible non-citizens
 - Permanent Resident Card
 - I-94 or I-94A

There are other documents that will work – see PA Student Handbook, Volume 1, Chapter 2, Citizenship

- SAVE process
 - Third Step Confirmation
 - The SAVE website is used to complete confirmation:
<https://www.uscis.gov/save>



CRITERIA CHECKED VIA APPLICATION PROCESS

- **SSN**
 - Matches SSN, DOB and Name on FAFSA with Social Security Administration's records
 - If DOB or Name are wrong, just correct on the FAFSA
 - School can correct with documentation or students can correct it themselves
 - If SSN is wrong, can correct on the FAFSA, but better to submit new FAFSA

If we have documentation that SSN is correct, we can award and disburse aid without resubmitting FAFSA for processing.

- Student will want to contact SS Administration to get their records corrected



CRITERIA CHECKED VIA APPLICATION PROCESS

- Residents of Freely Associated States (Micronesia, Marshall Islands, Palau) do not have SSN, but instead use a pseudo SSN assigned the first time they complete a FAFSA
 - First time applicants enter 666 to get a pseudo SSN
 - Applications with pseudo SSN do not pass the SSN match but that's okay



CRITERIA CHECKED VIA APPLICATION PROCESS

- **Default and Overpayment**
 - Not eligible if in default on a Title IV loan or have an overpayment of Title IV grant or loan
 - Need documentation from lender/servicer that the student is no longer in default or overpayment has been paid
- **Borrowing History**
 - Exceeded annual or aggregate loan limits
 - Annual:
 - \$5,500 (\$3,500), \$6,500 (\$4,500), \$7,500 (\$5,500) total (sub) for dependent student
 - \$9,500 (\$3,500), \$10,500 (\$4,500), \$12,500 (\$5,500) total (sub) for independent student
 - \$20,500 for graduate students (all unsub)
 - Aggregate
 - \$31,000 (\$23,000) - dependent undergraduate students
 - \$57,500 (\$23,000) - independent undergraduate students
 - \$138,500 (\$65,000) - graduate students (includes all undergrad loans too)



CRITERIA CHECKED VIA APPLICATION PROCESS

• Unusual Enrollment History

Flag	Indication	Action Needed	Resolution
N	No UEH	None	None needed
2	Possible enrollment (code 358) pattern problem	Review enrollment and financial aid records for past four years	If received Pell Grant or Direct Loan funds at current school at least once in the four years, no further action required.
3	Questionable enrollment (code 365) pattern	Review NGLD/S and transcripts for past four years	If academic credit earned at each prior school while receiving Pell Grant or Direct Loans, no further action required.



CRITERIA CHECKED VIA APPLICATION PROCESS

- UEH
 - Undergraduate and graduate enrollment reviewed independently
 - If academic credit not earned at other schools, then student may appeal.
 - SAP process is often used for this
 - School's decision is final



CONFLICTING INFORMATION

- "In addition to reviewing application and data match information from the CPS, a school must have an adequate internal system to identify conflicting information—regardless of the source and regardless of whether the student is selected for verification—that would affect a student's eligibility, such as information from the admissions office as to whether the student has a high school diploma or information from other offices regarding academic progress and enrollment status."
- "If your school has conflicting information concerning a student's eligibility or you have any reason to believe his application information is incorrect, you must resolve the discrepancies before disbursing FSA funds and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing FSA funds, you must still reconcile the conflicting information and take appropriate action under the specific program requirements."
 - Application and Verification Guide, Chapter 5, P 115, 2018-19 FSA Handbook

CONFLICTING INFORMATION

- Examples:
 - Simultaneous enrollment in elementary or secondary school
 - Prior Bachelor's degree
 - Incarceration
 - Dependency
 - Data conflicts

Document your resolution of the conflict!



EDUCATIONAL COURSEWORK AFFECTING STUDENT ELIGIBILITY

- Prior degrees
 - A student with a Bachelor's degree is not eligible for Pell Grant
- Remedial coursework
 - Student has to be accepted into an eligible program
 - No more than one year may be counted (30 semester hours, 45 quarter hours, 900 clock hours)
- ESL coursework
 - May be considered remedial coursework as part of an eligible program
 - Doesn't count in the one year limit



EDUCATIONAL COURSEWORK AFFECTING STUDENT ELIGIBILITY

- Program of study
 - Direct Assessment program
 - Does not specify level of academic engagement (not measured in credit hours)
 - Must have ED approval before offering DA programs
 - Programs at foreign schools are not eligible
 - Remedial coursework is not eligible
 - Prior learning is not eligible
- More information on DA in Dear Colleague Letter: GEN-14-23



FINAL NOTE

- A school may not impose additional general or Title IV program specific eligibility requirements that are not in the law or regulations
- Examples:
 - Requiring the completion of a form that asks things like debt and expenses before disbursing a federal loan
 - Requiring a minimum GPA to be considered for work-study job
 - Requiring students to work in the financial aid office to receive FSEOG



QUESTIONS?

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