

# PARTICIPANT'S HANDOUT



NASFAA  
**CORE**  
2014-15



## Student Eligibility

Module 3



NASFAA  
**TRAINING**



**NASFAA**

NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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# Module 3 – Student Eligibility

## *Participant’s Handout*

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# Student Eligibility

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To be eligible for Title IV assistance, a student must satisfy certain general eligibility requirements—some student related, some program related. The financial aid office is responsible for ensuring each student has met all relevant eligibility requirements before awarding and disbursing Title IV funds.

A school may not impose additional general or Title IV program-specific eligibility requirements that are not in the law or regulations. For example, a school may not require students to purchase books at the campus store before it disburses Title IV funds.

## Overview of Student Eligibility Requirements

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- General elements of eligibility require a student to:
  - Be a regular student enrolled or accepted for enrollment in an eligible program at an eligible institution;
  - Have a high school diploma or:
    - ◆ Have the recognized equivalent of a high school diploma,
    - ◆ Complete a high school curriculum in a home school setting that meets his or her state's home schooling requirements, or
    - ◆ Under certain conditions, demonstrate ability to benefit from the training or education offered;
  - Not be enrolled simultaneously in elementary or secondary school;
  - Be a United States (U.S.) citizen or national, or eligible noncitizen;
  - Have a correct Social Security Number (SSN);
  - Be registered with Selective Service, if required;
  - Not be in default on a Title IV loan or owe a Title IV grant or loan overpayment;
  - Not have borrowed in excess of annual or aggregate Title IV loan limits;
  - Not have property subject to a judgment lien for a debt owed to the U.S.;
  - Have repaid Title IV funds obtained fraudulently;
  - Sign a Statement of Educational Purpose certifying he or she will use Title IV aid only to pay educational costs;
  - Not have enrolled in multiple institutions solely to obtain Title IV credit balance funds to pay noneducationally-related expenses;
  - Be maintaining satisfactory academic progress (SAP);
  - Not have a disqualifying drug conviction; and
  - Have financial need, if applicable.
- In addition, a student's eligibility for Title IV aid may be affected by such factors as:
  - Prior degrees;
  - Enrollment status;
  - Remedial coursework;
  - Correspondence study;
  - Study via distance education;
  - Program of study; or
  - Incarceration.

# General Student Eligibility Requirements by Category

Criteria Checked via the Application Process	Criteria Checked and Monitored by the School	Criteria Not Specifically Checked but Must be Resolved if Conflicting Information Exists
<ul style="list-style-type: none"> <li>• Citizenship status</li> <li>• Social Security Number</li> <li>• Selective Service registration</li> <li>• Default and overpayment</li> <li>• Borrowing in excess of annual and aggregate loan limits</li> <li>• Fraudulently obtained Title IV funds</li> <li>• Unusual enrollment history (UEH)</li> <li>• Certain drug offense convictions</li> <li>• Eligibility for increased Title IV aid to children of certain deceased members of the U.S. military</li> <li>• Statement of Educational Purpose</li> </ul>	<ul style="list-style-type: none"> <li>• Enrollment as regular student in eligible program</li> <li>• High school diploma or recognized equivalent, home schooling, or ability to benefit from training or education offered</li> <li>• Satisfactory academic progress</li> <li>• Financial need</li> <li>• Individual program requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Simultaneous enrollment in elementary or secondary school</li> <li>• Property subject to lien for debts owed to U.S.</li> <li>• Incarceration</li> <li>• Suspected fraud</li> </ul>

## Criteria Checked via the Application Process

Matches and hold files compare information provided by the family on the Free Application for Federal Student Aid (FAFSA) to information stored in various federal databases or held by various federal agencies to confirm certain student eligibility criteria. The following chart lists the agency with which each match is conducted or data element is checked. Descriptions of the matches and the steps for resolving unfavorable match results are in *The ISIR Guide*, published annually by the U.S. Department of Education (ED). Students self-certify on the FAFSA whether or not they have a drug conviction, which could affect their eligibility for aid.

Agency	Eligibility Criterion
Social Security Administration (SSA)	<ul style="list-style-type: none"> <li>• Verifies student's claim of U.S. citizenship or U.S. national status</li> <li>• Verifies student's and parent's (if the student is dependent) SSNs are correct and the SSN corresponds to the individual's name and date of birth</li> <li>• Checks whether student's and parent's (if the student is dependent) SSN belongs to a deceased person or is associated with a date of death</li> </ul>
Department of Homeland Security (DHS)	<ul style="list-style-type: none"> <li>• Verifies student's eligible noncitizen status through primary verification and automated secondary confirmation processes</li> </ul>
Selective Service System	<ul style="list-style-type: none"> <li>• Verifies registration of eligible males with Selective Service</li> </ul>
National Student Loan Data System (NSLDS)	<ul style="list-style-type: none"> <li>• Verifies student's default and overpayment status</li> <li>• Informs school if fraudulently obtained Title IV funds have not been repaid</li> <li>• Ensures annual and aggregate award limits are not exceeded</li> <li>• Informs the school if the student subsequently becomes ineligible for Title IV funds based on new data in NSLDS</li> <li>• Alerts school of student's unusual enrollment history</li> </ul>
Department of Justice (DOJ) via ED Hold File	<ul style="list-style-type: none"> <li>• ED hold file lists individuals whose eligibility for federal benefits, including student aid, has been suspended or terminated by a judge under the Anti-Drug Abuse Act of 1988</li> </ul>
Department of Defense (DoD)	<ul style="list-style-type: none"> <li>• Identifies students who may be eligible for increased aid as the child of a parent or guardian who died as a result of military service in Iraq or Afghanistan after 9/11/01</li> </ul>
Student (self-certification only)	<ul style="list-style-type: none"> <li>• Worksheet to FAFSA Question 23 asks applicant whether he or she has disqualifying drug offense convictions</li> </ul>

# Citizenship

## ***Social Security Administration Citizenship Match***

- To receive Title IV aid, a student must be a:
  - U.S. citizen (includes a native of Puerto Rico, U.S. Virgin Islands, Guam, or Northern Mariana Islands);
  - U.S. national (includes a native of American Samoa or Swain's Island); or
  - Eligible noncitizen.
- If a student fails the citizenship match, a C-code and accompanying comment will appear on the student's Institutional Student Information Record (ISIR) and Student Aid Report (SAR).
  - The school must examine and copy the original documents the student provides supporting his or her claim to be a U.S. citizen or national.
    - ◆ Photocopying of the student's citizenship documents is permitted for financial aid purposes.
  - If the student is not a U.S. citizen or national, but is an eligible noncitizen, the student is instructed to:
    - ◆ Correct the response to indicate "eligible noncitizen;"
    - ◆ Provide his or her Alien Registration Number (A-Number); and
    - ◆ Resubmit his or her SAR to the Central Processing System (CPS), make corrections using FAFSA on the Web (FOTW) at [www.fafsa.ed.gov](http://www.fafsa.ed.gov), or request the school to correct the ISIR using FAA Access to CPS Online or the Student Aid Internet Gateway (SAIG).
- A student who fails the SSA citizenship match but continues to claim U.S. citizenship must provide the school with documentation.
  - The school must give the student at least 30 days, from the date the school received the student's initial ISIR or SAR indicating the failed citizenship match, to produce evidence of his or her citizenship.
- Acceptable documentation of U.S. citizenship or national status includes (but is not limited to) a:
  - U.S. passport (must be stamped "Noncitizen National" for natives of American Samoa or Swain's Island);
  - Copy of the student's birth certificate showing birth in the U.S. (including Puerto Rico, Guam, U.S. Virgin Islands, American Samoa, Swain's Island, or Northern Mariana Islands); or
  - Certificate of Naturalization.

## ***Department of Homeland Security Eligible Noncitizen Matches***

- Eligible noncitizens include:
  - Permanent residents of the U.S.;
  - Persons who are in the U.S. for other than temporary purposes; and
  - Citizens of the Federated States of Micronesia, Marshall Islands, and Palau.

### ***DHS Primary Verification Match***

- The CPS automatically conducts a database match with DHS at the time of initial application.
- If primary verification confirms the student's eligible noncitizen status, the ISIR/SAR will contain a comment to that effect; no further proof of citizenship is required.

### ***DHS Automated Secondary Confirmation Match***

- The CPS automatically initiates a secondary confirmation match if the:
  - Student's eligible noncitizen status is not confirmed via primary verification; and
  - Student provided his or her Alien Registration Number on the FAFSA.



## **Manual Secondary Confirmation**

- A school must initiate manual secondary confirmation with DHS no earlier than 5 and no later than 15 business days after receiving the student's ISIR if the:
  - Student's eligible noncitizen status is not confirmed via automated secondary confirmation;
  - School does not receive the results of automated secondary confirmation;
  - School has conflicting information about the student's citizenship status; or
  - School believes the information reported by the student is incorrect.
- The student must provide documentation confirming he or she is an eligible noncitizen.
  - The school must give the student at least 30 days from the date the school received the student's ISIR or SAR to provide the documentation.
- The school must examine and copy the original documents the student provides supporting his or her claim to be an eligible noncitizen.
  - Photocopying DHS documents is permitted for financial aid purposes.
  - If the document's endorsement or stamp does not photocopy well, the school should transcribe the information to the photocopy.
- Within 10 business days of receiving the student's documentation, the school must submit a copy of the documentation, along with a completed U.S. Citizenship and Immigration Services (USCIS) Immigration Status/Document Verification Request (Form G-845) to the USCIS field office that serves the school's state (*see <http://www.uscis.gov/g-845-addresses>*).
  - Exception: If the student's documentation does not appear to provide evidence that the student is an eligible noncitizen, the school may determine the student is not eligible for Title IV assistance.
- If the school does not receive USCIS' response within 15 business days, it must make its own determination of the student's eligibility.
  - If the school determines the student to be eligible, it must award and disburse Title IV funds to the student.
- Once a student's eligible noncitizen status is confirmed through secondary confirmation, the school need not request confirmation in subsequent award years unless:
  - The documentation has expired; or
  - The student's eligible noncitizen status is a conditional permanent resident, a refugee, a Cuban-Haitian entrant, or a person granted asylum.
- An exception to the manual secondary confirmation requirement applies to victims of human trafficking and to qualifying relatives (i.e., spouse, child, or parent of a victim of human trafficking).
  - If the student is a victim of human trafficking, he or she must provide a Health and Human Services (HHS) Certification Letter or Eligibility Letter.
  - If the student is a qualifying relative, he or she must provide his or her T-visa and a copy of the victim's HHS Certification Letter or Eligibility Letter.
  - The school must:
    - ◆ Make a copy of the student's documentation;
    - ◆ Call the HHS Office of Refugee Resettlement at 866.401.5510 to verify the Letter's and, if applicable, the T-Visa's validity and to confirm HHS certification or eligibility has not expired; and
    - ◆ Document the time, date, and results of the HHS call.
  - In subsequent award years, the school must verify with HHS that the Certification Letter or Eligibility Letter remains in force.

- Another exception to the manual secondary confirmation requirement applies to battered immigrants-qualified aliens and their designated children. These individuals are eligible for federal benefits under the Violence Against Women Act (VAWA).
  - If the student's or designated child's self-petition has been approved or a prima facie case has been established, he or she must submit a USCIS-issued I-797 Notice of Action form.
  - If the student's deportation has been suspended or his or her removal canceled, he or she must submit a copy of the immigration court order.
  - The school must:
    - ◆ Make a copy of the student's documentation;
    - ◆ Review the documentation to ensure it clearly indicates suspension of deportation or removal canceled, as appropriate, and it has not expired; and
    - ◆ Maintain a copy in the student's records.
  - If the student's documentation is lost or expired, or if the school is unclear about the documentation, it should submit a completed Form G-845 to USCIS with the student's documentation attached, check Box 9b—Other Information Attached, and note "VAWA verification."
  - ◆ Dear Colleague Letter GEN-10-07 includes information about processing Form G-845 for these students.

**Form G-845, Document Verification Request**

**Section A. To Be Completed by Registered Agency Only**

To: U.S. Citizenship and Immigration Services (USCIS)

Attn: USCIS SAVE Program Status Verification Office

[Redacted]

From: Type or Stamp Name and Address of Registered Agency

[Redacted]

Print clearly since USCIS may use above agency address with a No. 10 window envelope.

1. Immigration Document Number:

Alien Registration Number (A-Number)

A- [Redacted]

I-94 (Arrival-Departure Record) Number

▶ [Redacted]

Other immigration number (if A-Number/I-94 Number not available): [Redacted]

Identify document containing the other immigration number: [Redacted]

2. Applicant's name as shown on the immigration document (Last, First, Middle)

[Redacted]

3. Nationality

[Redacted]

4. Date of Birth (mm/dd/yyyy): ▶

[Redacted]

5. Social Security Number:

[Redacted]

6. Student and Exchange Visitor Information System (SEVIS)

Number: ▶

[Redacted]

7. Case Verification Number

[Redacted]

8. Registered Agency Case Number

[Redacted]

9. Check all that apply:

a. Photocopy of primary immigration document attached. Ensure copies are legible. If there is print on both sides of the immigration document, attach a copy of front and back.

b. Other Information Attached (specify documents):

[Redacted]

10. Benefit

TANF  Unemployment Insurance

Education Grant/ Loan/ Work Study  Employment Authorization

Food Stamps  Social Security Number

Housing Assistance  SSI or RSDI

Medicaid/Medical Assistance  Driver's License/ID

Background Check

Other (specify below)

[Redacted]

11. Name of Agency Official

[Redacted]

12. Title of Agency Official

[Redacted]

13. Telephone Number (include area code)

( [Redacted] ) [Redacted] - [Redacted]

14. Fax Number (include area code):

[Redacted]

15. Date (mm/dd/yyyy): ▶

[Redacted]



Section A. To Be Completed by Registered Agency Only (continued)

Registered Agency Comments

[Large empty box for Registered Agency Comments]

Section B. To Be Completed by USCIS

**USCIS RESPONSES:** After review of the documents and/or information submitted, and/or of our records, we find that the document appears valid and relates to a/an:

- 1. Lawful Permanent Resident alien of the United States.
- 2. Conditional Resident alien of the United States.
- 3. Alien employment authorized in the United States as indicated:
  - a. No expiration (indefinite)
  - b. Expires on (mm/dd/yyyy):
  - c. Prior employment authorization date(s):  

<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
- 4. Alien not employment authorized in the United States.
- 5. Alien has an application pending for (specify USCIS benefit):
- 6. Alien granted asylum or refugee status in the United States.

- 7. Alien paroled into the United States under section 212 of the Immigration and Nationality Act (INA).
  - a. No expiration (Indefinite)
  - b. Parole granted on (mm/dd/yyyy):
  - c. Parole expires on (mm/dd/yyyy):
- 8. Cuban/Haitian entrant of the United States.
- 9. Conditional entrant of the United States.
- 10. Nonimmigrant alien.  
(Specify type or class below):
- 11. American Indian born in Canada to whom the provisions of section 289 of the INA apply. Date status recognized (mm/dd/yyyy):
- 12. U.S. Citizen.

**OTHER USCIS RESPONSES:**

- 13. USCIS is searching indices for further information.
- 14. This document is not valid because it appears to be: (Check all that apply)
  - a. Expired
  - b. Altered
  - c. Counterfeit



Section C. USCIS Comments

- 1. Unable to process request without an original consent of disclosure statement signed by the applicant. Resubmit request.
- 2. No determination can be made from the information submitted. Obtain copy of the original alien registration document. Resubmit request.
- 3. No determination can be made without seeing both sides of the documents submitted. Resubmit request.
- 4. Cannot read document copy. Resubmit request.
- 5. Other:

USCIS Stamp





# Social Security Number

## ***Student Social Security Number Match***

- The student must have a SSN that has been confirmed through the database match between the CPS and the SSA.
  - Exception: Students who are residents of the Federated States of Micronesia, the Marshall Islands, or Palau will not have SSNs.
- If the student fails the database match, the school must give the student at least 30 days from the date it receives the student's ISIR/SAR or until the end of the award year, whichever is later, to provide clear and convincing evidence of his or her correct SSN, including a copy of:
  - The student's Social Security card; or
  - A letter from the SSA confirming the student's SSN.
- If the student provides documentation that the reported SSN is correct, the school:
  - May award and disburse Title IV aid without the ISIR/SAR being submitted for reprocessing; and
  - Must maintain a copy of the SSN documentation in the student's file.
- If the reported SSN is incorrect, it must be corrected.
  - The correction may be made on the ISIR/SAR or via FOTW if there is no evidence the incorrect SSN belongs to another student.
  - The correction must be made using a new FAFSA or a Correction Application if the incorrect SSN and the first two letters of the last name match that of another student. See below.
- The student's original FAFSA for the award year creates the student's CPS identifier (i.e., the first two letters of the last name and the reported full SSN).
  - Correcting the SSN will allow database matches with other federal agencies, but will not change the student's CPS identifier.
  - If two students file FAFSAs reporting the same SSN and the student reporting the correct SSN filed after the student reporting the incorrect SSN, both students must file new applications.
    - ◆ The student who reported the correct SSN must file a Correction Application [obtained from ED by calling (319) 665-7101], and the student who reported the incorrect SSN must file a new FAFSA.
  - If two students file FAFSAs reporting the same SSN and the student reporting the correct SSN filed before the student reporting the incorrect SSN, the CPS will have the first student's data so a Correction Application is not necessary.
    - ◆ Only the second student will need to submit a new FAFSA.
  - Because the new applications will show a later application receipt date than the date on the original FAFSAs, both students should keep, if needed, the output document from their original application as proof of compliance with institutional, state, or other organization application deadlines.
  - The school must receive an ISIR/SAR with the correct SSN before awarding and disbursing Title IV aid.

## ***Parent Social Security Number Match***

- A dependent student's FAFSA will be rejected by the CPS if during an initial database match between the CPS and the SSA:
  - At least one parent does not have a SSN confirmed if the parents are married; or
  - The parent's SSN is not confirmed if a single parent household.
    - ◆ Exception: The parent is a resident of the Federated States of Micronesia, the Marshall Islands, or Palau.

## ***Date of Death Match***

- ED verifies that an applicant's SSN does not appear on the master death file provided by the SSA listing SSNs associated with deceased persons.
- The CPS regularly conducts rematches with the master death file.
  - If the student's SSN is on the master death file, the CPS resends the student's record to the SSA for a rematch.
- If the SSA rematch confirms a date of death for the applicant, the CPS:
  - Sends an ISIR to the school (no SAR is sent to the student); and
  - Disables the student's Federal Student Aid (FSA) Personal Identification Number (PIN).
- If the student is not deceased and the SSN is correct, the student must contact the SSA to resolve the problem.
  - After resolving the problem with the SSA, the:
    - ◆ School or the student must re-enter the student's name or date of birth on the ISIR or SAR and submit the re-entered data to the CPS as a correction; and
    - ◆ Student may apply for a new FSA PIN after receiving a clear SSA match.

## **Selective Service Registration**

- To receive Title IV aid, a male (including a student for whom a parent has applied for a parent PLUS) must have registered with Selective Service if he:
  - Is at least 18 years old; and
  - Was born after December 31, 1959.
- A student who is a citizen of the Federated States of Micronesia or the Marshall Islands is exempt from the registration requirement as long as he has not lived in the U.S. for more than one year for any reason other than as a student or a government employee of his homeland.
- A refugee or other eligible noncitizen must register if he entered the U.S. before age 26.
- A student does not have to register with Selective Service if he:
  - Is below the age of 18 at the time the application is completed;
  - Was born before January 1, 1960;
  - Is a noncitizen who first entered the U.S. after turning age 26;
  - Is a noncitizen who entered the U.S. as a lawful nonimmigrant on a valid visa and remained in the U.S. on the terms of that visa until after age 26;
  - Is currently in the U.S. Armed Services and on active duty (exception does not apply if the student is a member of the Reserve or National Guard, and is not on active duty);
  - Is or was unable to register due to being hospitalized, incarcerated, or institutionalized;
  - Is enrolled in an officer procurement program at:
    - ◆ The Citadel,
    - ◆ North Georgia College and State University,
    - ◆ Norwich University,
    - ◆ Virginia Military Institute,
    - ◆ Texas A&M University, or
    - ◆ Virginia Polytechnic and State University;
  - Is a commissioned officer of the Public Health Service on active duty, or a member of the Reserve of the Public Health Service on specified active duty; or

- Has had sex reassignment surgery from female to male.
  - ◆ If a male has had sex reassignment from male to female, registration is still required.
- If the database match fails to confirm the student's Selective Service registration, the school must withhold all Title IV funds and may not originate a Federal Direct Student Loan (Direct Loan) until the student's status is resolved.
- The school must give the student at least 30 days from the date the school is notified of the database match result to provide documentation of his eligible status.
  - The school may confirm a student's registration status by contacting Selective Service at 847.688.6888 or by checking the Selective Service website at <https://www.sss.gov/RegVer/wfVerification.aspx>; or
  - The student may provide documentation that he:
    - ◆ Is registered with Selective Service,
    - ◆ Is not required to be registered with Selective Service, or
    - ◆ Did not knowingly and willfully fail to register with Selective Service.
  - The school should request the student provide a Status Information Letter from Selective Service if the student is not clearly exempt from the registration requirement.
    - ◆ If the student receives a "general exemption letter" or "DOB before 1960" letter, he is exempt from the registration requirement.
    - ◆ Other letter types require a financial aid administrator determination.
- The financial aid administrator must determine whether a student did not knowingly and willfully fail to register based on his or her evaluation of the student's circumstances.

## **Defaults, Overpayments, Exceeded Loan Limits, Fraudulently Obtained Funds, and Unusual Enrollment History**

- The student (and parent in the case of a parent PLUS) must:
  - Not be in default on any Title IV loan;
  - Not owe an overpayment on any Title IV grant or loan;
  - Not have borrowed in excess of annual or aggregate Title IV loan limits; and
  - Have repaid in full any Title IV funds he or she fraudulently obtained.
- In signing the FAFSA, the student certifies he or she is not in default and does not owe an overpayment.
- A student (or parent PLUS applicant) is considered to have fraudulently obtained Title IV funds if he or she has been convicted of or has pled guilty or nolo contendere (i.e., no contest) to a crime involving fraud in obtaining those funds.
  - Fraudulently obtained funds cannot be repaid under a satisfactory repayment arrangement, and a fraudulently obtained loan cannot be rehabilitated.
- No Title IV aid may be awarded or disbursed until the default, overpayment, exceeded loan limits, or fraud situation has been resolved.
- A student (or parent PLUS applicant) is ineligible if they hold property subject to a judgment lien for a debt owed to the federal government.

### ***NSLDS Match***

- NSLDS is a national database containing selected financial aid history information on Title IV recipients.
  - Data are provided by Title IV lenders, guaranty agencies, ED, and schools.
- The NSLDS database match includes:
  - Prescreening a student's application for Title IV loan defaults, loan or grant overpayments, exceeded Title IV annual and aggregate loan limits, and fraud convictions; and



- Postscreening the student's CPS record for changes that may affect the student's eligibility.
- Except for a transfer student, a school may use NSLDS financial aid history information from the student's ISIR to confirm eligibility.
  - Once the school has reviewed this information and established the student's eligibility, the school is not required to recheck NSLDS data prior to disbursing Title IV funds unless a subsequent system-generated ISIR/SAR indicates a change in eligibility based on new NSLDS data.

### ***Transfer Student Monitoring Process***

- A school must use ED's Transfer Student Monitoring Process to obtain the NSLDS financial aid history information of a transfer student before disbursing Title IV aid.
- This online process consists of three stages:
  1. The school **informs** NSLDS of which students to monitor;
  2. NSLDS **monitors** those students and checks for any change in the students' financial aid history (other than a defaulted loan or overpayment) that may affect the students' current awards (e.g., a change in Federal Pell Grant and/or Title IV loan disbursements); and
  3. NSLDS **alerts** the school of any new NSLDS data in the records of students on the school's transfer student monitoring list.
- The school may not disburse any Title IV funds to a student being monitored until seven days following the school's request for transfer student monitoring, unless the school obtains the NSLDS information by accessing NSLDS Professional Access online at [https://www.nslsdfap.ed.gov/nsls\\_fap/default.jsp](https://www.nslsdfap.ed.gov/nsls_fap/default.jsp).
- Schools may utilize a transfer monitoring repopulate webpage that allows them to add students continuously from one monitoring period to the next.

### ***Resolving Defaults, Overpayments, and Exceeded Loan Limits***

- For a defaulted loan, the student must repay the loan in full or:
  - Enter into a satisfactory repayment arrangement with the loan holder and voluntarily make 6 consecutive on-time monthly payments under that repayment arrangement;
  - Enter into a compromise arrangement with the loan holder to settle a defaulted Federal Perkins Loan debt for less than the total amount due; or
  - Include the defaulted loan in a Direct Consolidation Loan after voluntarily making 3 on-time consecutive full monthly payments prior to consolidation or agreeing to repay the Consolidation Loan under the Income-Based, Income-Contingent, or Pay As You Earn repayment plans.
- A defaulter borrower may regain Title IV eligibility under a satisfactory repayment arrangement only once.
- A student also may regain eligibility by having the defaulted loan discharged through bankruptcy or by demonstrating that a loan in active bankruptcy is dischargeable under applicable bankruptcy law.
- For a Title IV overpayment, the student must repay the overpayment in full or make arrangements, satisfactory to the holder of the overpayment, to repay it.
  - The regulations do not define what the repayment arrangements must be.
- If the student has borrowed in excess of Title IV loan limits, the school must determine whether the student inadvertently borrowed the excess amount.
  - If the student did not inadvertently borrow the excess, he or she must repay the excess amount in full.
  - If the student inadvertently exceeded annual or aggregate loan limits, he or she must repay the excess amount or make arrangements, satisfactory to the holder of the loan, to repay the excess amount.
    - ◆ The regulations do not define what the repayment arrangements must be.

## ***Incorrect Data in NSLDS***

- If the student has resolved a default, overpayment, borrowing in excess of loan limits, or fraud situation but NSLDS does not reflect that information, the school must obtain clear documentation that the situation has been resolved before awarding or disbursing Title IV funds.
  - Documentation must be provided by the entity reporting the defaulted loan, overpayment, exceeded loan limits, or fraud conviction to NSLDS.
- The data provider is responsible for correcting erroneous NSLDS data.
  - A good institutional practice is to assist students having a problem in getting the data provider to correct NSLDS data.
  - Schools (not students) may contact the NSLDS Customer Service Center to report NSLDS conflicts by:
    - ◆ Calling 800.999.8219; or
    - ◆ Sending an email to [nslds@ed.gov](mailto:nslds@ed.gov).

## ***Unusual Enrollment History***

- NSLDS also checks a student's pattern of enrollment to identify whether the student has an unusual enrollment history (UEH) with respect to the receipt of Federal Pell Grant funds for enrollment in multiple institutions within the past three award years (i.e., for 2014–15, the three award years are 2011–12, 2012–13, and 2013–14).
- A student will receive one of three UEH Flag values on his or her ISIR:
  - "N" indicates there is no UEH and, therefore, no further action is required by the institution;
  - "2" indicates a possible enrollment pattern problem (e.g., a student received Federal Pell Grant funds at three institutions over two award years); and
  - "3" indicates a questionable enrollment pattern (e.g., a student received Federal Pell Grant funds at three or more institutions during a single award year).
- If a student receives UEH Flag "2," the institution must review the student's enrollment and financial aid records to determine if the student received a Federal Pell Grant during any of the three applicable award years at the institution performing the review.
  - If yes, no further action is required unless the institution has reason to believe that the student remains enrolled just long enough to collect Title IV credit balance funds (in which case the institution must follow guidance for resolving UEH Flag "3" below).
  - If no, the institution must follow guidance for resolving UEH Flag "3" below.
- If a student receives UEH Flag "3," the institution must:
  - Review NSLDS to identify the institutions at which the student received a Federal Pell Grant during the three applicable award years; and
  - Review academic transcripts it already possesses and/or have the student provide academic transcripts or grade reports from the previously attended institutions in order to determine if the student earned academic credit for each award year during which the student received a Federal Pell Grant at those applicable institutions.
    - ◆ Academic credit is considered to have been earned if the academic records show the student completed any credit hours or clock hours.
  - **Academic Credit Earned:** If the institution determines the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required unless the institution has other reasons to believe the student enrolls just to receive a Title IV credit balance (in which case, the institution must require the student to provide additional information as discussed under "Academic Credit Not Earned" below).

- **Academic Credit Not Earned:** If the student did not earn academic credit at one or more of the previously attended institutions and, if applicable, at the institution performing the review, the institution must obtain documentation from the student explaining why the student failed to earn academic credit and determine whether the documentation supports the:
  - ◆ Reasons given by the student for the student's failure to earn academic credit; and
  - ◆ Student did not enroll only to receive Title IV credit balance funds.
- Some personal and academic reasons which may explain the student's failure to earn academic credit may include, but are not limited to:
  - ◆ Illness;
  - ◆ Family emergency;
  - ◆ Changes in where the student is living;
  - ◆ Military obligations;
  - ◆ Enrollment at an institution presenting unexpected academic challenges; or
  - ◆ Enrollment in an academic program that did not meet the student's needs.
- Whenever possible, the institution should obtain third-party documentation to support the student's claim.
- If a student did not earn academic credit at one or more of the relevant institutions and does not provide, to the financial aid administrator's satisfaction, an acceptable explanation and documentation for each of those failures, the institution must deny the student any additional Title IV aid.
- The institution must provide the student an opportunity to question and appeal its decision.
  - ◆ Institutional determinations are final and cannot be appealed to ED.
  - ◆ The reasons for the institution's decision must be documented and maintained in the student's file.
- The institution must provide the student with information as to how he or she may subsequently regain Title IV aid eligibility.
  - ◆ Since the basis for the denial is the student's academic performance, ED expects that successful completion of academic credit would form the basis for the student's subsequent request for and renewal of Title IV eligibility.
  - ◆ This could include meeting the requirements of any academic plan the institution chooses to establish with the student, following the SAP regulations for such plans under sections 668.34(c)(3)(iii)(B), (c)(4), (d)(2)(ii)(B), and (d)(3).
- If the student meets the institution's standards for regaining Title IV eligibility, eligibility would be effective under the same provisions that apply when a student gains or regains eligibility, as described under Changes in Student's Eligibility Status on page 3-29.

## Drug Convictions

### *Department of Justice Drug Abuse Hold File Match*

- A student's eligibility for Title IV aid must not have been suspended or terminated as part of a court's sentencing in the conviction for certain drug-related federal or state offenses under section 5301 of the Anti-Drug Abuse Act of 1988.
- If the student's Title IV eligibility is suspended, the court notifies the DOJ which, in turn, notifies ED of the suspension.
  - ED places the student's record in a "Hold" file.
  - The student's ISIR/SAR contains a comment instructing the student to contact ED within 30 days by calling 202.377.3889 for guidance on resolving the issue.

## ***Drug Convictions via FAFSA Question 23***

- A student's Title IV eligibility is suspended if the student is convicted under federal or state law for an offense involving the possession or sale of a controlled substance while enrolled and receiving Title IV aid (including during a break that occurs during a period of enrollment, such as a holiday or one-week spring break).
  - The suspension is effective from the date of the conviction.
  - Duration of the suspension is linked to the number of convictions and the type of conviction.
  - For a conviction for an offense involving the possession of an illegal substance, the ineligibility period is:
    - ◆ One year for the first offense;
    - ◆ Two years for the second offense; and
    - ◆ An indefinite period for the third offense.
  - For a conviction for an offense involving the sale of an illegal substance, the ineligibility period is:
    - ◆ Two years for the first offense; and
    - ◆ An indefinite period for the second offense.
  - If the conviction was for both the possession and sale of illegal drugs and the periods of ineligibility are different, the suspension of the student's eligibility will be for the longer period.
  - If a student's eligibility is suspended under this drug conviction provision, the school must notify the student, in writing, of the loss of his or her Title IV eligibility and how he or she may regain eligibility.
- A student's eligibility may be restored before the suspension is scheduled to end if the:
  - Conviction is reversed, set aside, or otherwise rendered invalid by the court;
  - Student satisfactorily completes an approved drug rehabilitation program, which includes passing two unannounced drug tests from the program; or
  - Student passes two unannounced drug tests that are part of an approved drug rehabilitation program without completing the rest of the program.
- Information regarding whether a student meets this student eligibility criterion is collected in Question 23 on 2014–15 FAFSA.
  - There is no database match.
  - If the student is using FOTW and answers "Yes" to this question, FOTW skip logic immediately requires the student to answer a series of questions to determine his or her eligibility.
  - If the student completed a paper FAFSA and either answered "Yes" to Question 23 or left it blank, the CPS will send a Worksheet for Question 23 for the student to complete and the student's ISIR/SAR will contain a C-code.
    - ◆ The student also may complete the worksheet by calling 1.800.4.FED.AID (1.800.433.3243) or by going to FOTW at [www.FAFSA.ed.gov](http://www.FAFSA.ed.gov).
- Information about whether the student has a drug conviction or whether the student has regained eligibility (i.e., by completing an approved drug rehabilitation program that includes passing two unannounced drug tests or successfully passing two unannounced drug tests that are a part an approved rehabilitation program without completing the rest of the program) is self-certified by the student.
  - Unless the school has conflicting information, the school is not required to confirm any information provided by students regarding whether the student has:
    - ◆ A drug conviction;
    - ◆ Successfully completed an approved rehabilitation program that includes passing two unannounced drug tests; or
    - ◆ Successfully passed two unannounced drug tests that are part of an approved rehabilitation program without completing the rest of the program.

## Department of Defense Match

- A student, whose parent or guardian died as a result of U.S. military service in Iraq or Afghanistan after September 11, 2001, may be eligible for increased amounts of Title IV aid if, at the time of the parent's or guardian's death, the student was under the age of 24 or was enrolled (full or part time) at an institution of higher education.
  - If the student meets the above criteria and is eligible for a Federal Pell Grant, the financial aid administrator sets the student's expected family contribution (EFC) to zero when determining the student's eligibility for all Title IV programs (including a full Federal Pell Grant).
  - If the student meets the above criteria and is not eligible for a Federal Pell Grant, the:
    - ◆ Student is eligible for an Iraq and Afghanistan Service Grant (IASG) calculated in accordance with guidance in Module 8—Calculation of Federal Pell Grant and Iraq and Afghanistan Service Grant Awards; and
    - ◆ Financial aid administrator uses the CPS-calculated EFC when determining the student's eligibility for all other Title IV programs.
  - A student may not receive a Federal Pell Grant and IASG for the same award year.
- There is a database match with the DoD to identify applicants who have lost a parent or guardian as a result of military service in Iraq or Afghanistan after September 11, 2001.
  - If there is a match, the:
    - ◆ Student's ISIR will contain a DoD Match Flag of "Y" and the date of the parent's death;
    - ◆ CPS will not recalculate the EFC (the financial aid administrator must assess the student's eligibility for the increased award amount); and
    - ◆ CPS will send the student a personalized letter informing him or her of the potential increase in his or her eligibility for Title IV aid.
- After processing the student's initial application for the award year, the CPS will compare the records of all students for whom there was no match each time the DoD updates its database.
  - If there is a match, the CPS will send the:
    - ◆ School a system-generated ISIR containing comment code 298, a DoD Match Flag of "Y," and the date of the parent's death; and
    - ◆ Student a personalized letter explaining the potential increase in funding and a system-generated SAR with a comment instructing the student to contact the financial aid office for more information.

## Statement of Educational Purpose

- By signing the FAFSA, the student certifies that all Title IV funds received will be used solely to pay the costs associated with postsecondary education.

## Criteria Monitored by the School

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### Academic Credentials: Institutional Eligibility

- To meet institutional eligibility criteria, the school must admit as *regular students* only persons who:
  - Have a high school diploma or its recognized equivalent; **or**
  - Are beyond age of compulsory attendance in the state in which the postsecondary institution is located.

## **Academic Credentials: Student Eligibility**

- To be eligible for Title IV assistance a student must be enrolled or accepted for enrollment as a regular student in an eligible program **and**:
  - Have a high school diploma or its recognized equivalent;
  - Have completed his or her home state's requirements applicable to home schooling; **or**
  - Demonstrate his or her ability to benefit (ATB) from the training or education offered under certain conditions described below.

### ***Regular Student in an Eligible Program***

- A regular student is defined as one who is enrolled or accepted for enrollment at the institution for the purpose of obtaining a degree, certificate, or other recognized educational credential offered by the institution.
  - Exceptions: A student who is not a regular student may receive Title IV aid if he or she is enrolled in preparatory coursework, certain teacher certification programs, or a comprehensive transition and postsecondary program for students with an intellectual disability.

### ***Recognized Equivalent of a High School Diploma***

- The recognized equivalent of a high school diploma is defined as:
  - A General Education Development (GED) certificate;
  - A state certificate the student received after passing a state-authorized examination that the state recognizes as the equivalent of a high school diploma;
  - The academic transcript of a student who has successfully completed at least a two-year program acceptable for full credit toward a baccalaureate degree; or
  - For a person seeking enrollment in an educational program leading to at least an associate degree or its equivalent, who has not completed high school, but has excelled academically in high school, documentation that the student excelled academically in high school and has met the school's formal written policies for admitting such students.
    - ◆ Exception: A student, who is enrolled in a comprehensive transition and postsecondary program for students with an intellectual disability, need not have a high school diploma or its recognized equivalent.
- If the college or ED has reason to believe the high school diploma is not valid, the college must evaluate the validity of the applicant's high school completion.

### ***Trial or Conditional Period of Enrollment***

- A school may offer a trial or conditional period in which a student:
  - May attend a program without incurring charges; and
  - Does not receive Title IV aid.
- Upon successful completion of the trial period and enrollment as a regular student, the institution can:
  - Pay the student Federal Pell Grant, Teacher Education Assistance for College and Higher Education (TEACH) Grant, and campus-based aid for the entire payment period; and
  - Direct Loans for the period of enrollment.



## ***Home Schooling***

- For Title IV eligibility purposes, a home school setting must be treated as a home school or private school under state law.
- A home schooled student is eligible for Title IV aid if he or she has:
  - Obtained a secondary school completion credential for home schooling (other than a high school diploma or its recognized equivalent) provided for under state law; **or**
  - Completed a secondary school education in a home school setting that qualifies as an exemption from compulsory attendance requirements under state law, if state law does not require a home schooled student to obtain a high school completion credential.
- A student, who has completed home schooling at an age younger than the age of compulsory attendance in the state where he or she was home schooled or the state where the institution is located, is considered to be beyond the age of compulsory attendance if the institution's state would not require the student to further attend secondary school or continue to be home schooled.

## ***Ability to Benefit***

- Generally, to receive Title IV aid, a postsecondary student without a high school diploma or its equivalent must have the same basic skills and learning abilities as high school graduates.
- A student without a high school diploma or its equivalent who attended or was registered to attend a Title IV-eligible academic program at a Title IV-eligible institution (regardless of the receipt of Title IV aid) prior to July 1, 2012, may establish Title IV eligibility using one of the following ATB alternatives:
  - Achieving a passing score, specified by ED, on an independently administered ATB test approved by ED;
  - Successfully completing at least six semester, trimester, or quarter credit hours, or the equivalent coursework (225 clock hours), applicable toward a degree or certificate offered by the postsecondary institution; or
  - Being enrolled in an eligible institution participating in an ED-approved state process.
- A student, who first enrolls in a program of study on or after July 1, 2012, does not have a high school diploma or recognized equivalent, and did not receive a secondary school education in a home school setting, is not allowed to use the ATB alternatives to establish eligibility for Title IV aid.

## **Satisfactory Academic Progress**

- A student must maintain SAP in his or her course of study according to the school's SAP policy.
  - For a student with an intellectual disability enrolled in a comprehensive transition and postsecondary program, the student must be making SAP as defined, by the institution, in the context of the transition program itself.
- Student Assistance General Provisions regulations contain requirements governing SAP.
- A school must confirm a student is making SAP, according to the school's policy, as of the last time there was a formal SAP evaluation, before it may:
  - Disburse Title IV funds;
  - Originate a Direct Loan; or
  - Release each disbursement of a multiply-disbursed Direct Loan.
- A school's measurement of a student's SAP must include the student's entire attendance at the school, including periods during which the student did not receive Title IV aid.
  - *Example 1:* A student applies for financial aid for the first time at the beginning of his or her fifth semester in attendance. The school must include the student's first four semesters of attendance when evaluating whether the student meets the school's SAP qualitative and quantitative standards.

- *Example 2:* A student last attended the school 10 years ago. When the student left, he or she had attempted/completed two years of coursework towards a baccalaureate degree. The student returns to the school to complete his or her baccalaureate degree. The school must include all the coursework the student attempted during his or her prior enrollment at the school when evaluating whether the student meets the school's SAP qualitative and quantitative standards.
- If a student loses Title IV eligibility for failure to meet SAP requirements, the student regains eligibility when the school:
  - Determines the student is again meeting the school's SAP standards; or
  - Allows the student to appeal and approves the student's appeal.

### **SAP Policy Requirements**

- A school must establish, publish, and apply reasonable standards for measuring whether a student is maintaining SAP.
  - The standards for Title IV aid recipients must be the same as or stricter than the school's standards for students in the same academic program who are not receiving Title IV aid.
- A school's SAP policy must provide for consistent application of standards to all students within categories of students (e.g., full-time, part-time, undergraduate, and graduate students) and educational programs.
- The policy must provide for evaluation of a student's academic progress:
  - At the end of each payment period, if the student's program is one academic year in length or shorter; or
  - For all other programs, at the end of each payment period or at least annually to correspond with the end of a payment period.
- A school's policy must specify the grade point average (GPA) a student must achieve at each evaluation.
  - If a GPA is not an appropriate qualitative measure, the policy must include a comparable assessment against a norm.
  - If a student is enrolled in a program longer than two academic years, the policy must state that at the end of the second academic year, the student must have a GPA of at least a "C" or its equivalent, or have academic standing consistent with the school's graduation requirements.
    - ◆ The "end of the student's second year" is reached when the student has been in attendance for two years, regardless of his or her enrollment level or academic classification.
    - ◆ All attended periods count, including optional periods such as a summer term.
    - ◆ For a student who takes time off during his or her studies, unattended periods do not count.
    - ◆ *Example:* Lisa is enrolled in a four-year baccalaureate degree program that is offered in semesters. The summer semester is an optional enrollment period. Suppose Lisa begins enrollment during the fall semester, does not take the summer off, and enrolls half time for each semester in the next academic year. In this scenario, Lisa must have at least a "C" after completing the second fall semester. However, if Lisa took the summer off, she must have at least a "C" after completing the second spring semester.
- A school's policy must specify the pace at which the student must progress through his or her program to ensure the student will complete the program within the maximum time frame.
  - The maximum time frame for:
    - ◆ An undergraduate program measured in credit hours, a period that is no longer than 150 percent of the published length of the program;
    - ◆ An undergraduate program measured in clock hours, a period that is 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; and
    - ◆ A graduate program, a period defined by the institution that is based on the length of the program.



- The school must evaluate a student's pace at the end of each evaluation period.
- A student's pace is calculated by dividing the number of cumulative hours the student has successfully completed by the cumulative number of hours the student has attempted.
  - ◆ The school does not have to include remedial courses.
  - ◆ For transfer students, credits accepted towards the student's new program count as both attempted and completed hours.
- A school's policy must describe the effect of the following on SAP:
  - Nonpunitive grades and repeated coursework;
  - Remedial, enrichment, and English as a Second Language (ESL) courses;
  - Course incompletes;
  - Audited and pass/fail courses;
  - Transfer and consortium courses;
  - Withdrawals and absences; and
  - Changes in course of study/major.
- If the school does not permit appeals, its policy must describe how a student can re-establish eligibility for Title IV aid.
- A school's policy must provide for notification to students of the results of an evaluation that impacts a student's eligibility for Title IV aid.

## ***SAP Policy Options***

### *Frequency of Evaluation*

- A school may choose to evaluate students' SAP more frequently than once a year.
- A school that evaluates SAP at the end of each payment period may use the financial aid warning status.
  - A student on financial aid warning may receive Title IV aid for one payment period after the school determines he or she is not meeting SAP standards.
  - A school that evaluates SAP less frequently than every payment period cannot use the financial aid warning status.

### *Appeals*

- A school's policy may allow a student to appeal its determination that he or she is not meeting the institution's SAP standards.
- If a school allows appeals, its appeal policy must include:
  - How the student may re-establish eligibility for Title IV aid;
  - The basis on which a student may file an appeal:
    - ◆ The death of a relative,
    - ◆ An injury or illness of the student, or
    - ◆ Other special circumstances; and
  - Information the student must submit regarding why he or she failed to make SAP and what has changed in the student's situation that will allow him or her to meet SAP standards at the next evaluation.
- A school may approve a student's appeal if it:
  - Determines the student should be able to make satisfactory progress during the subsequent payment period and meet the school's standards by the end of that payment period; or
  - Develops an academic plan for the student that, if followed, will ensure the student is able to meet the school's SAP standards by a specific point in time.

- If a school approves a student's appeal, it can place the student on financial aid probation status.
  - A student on financial aid probation without an academic plan may receive Title IV aid for the subsequent payment period.
  - If an institution develops an academic plan for a student, the student is eligible for Title IV aid as long as he or she is meeting the requirements of the plan.

## Financial Need

- A student must demonstrate financial need in accordance with the Title IV program under which he or she has applied for aid.
- For the campus-based, Direct Subsidized Loan, and other need-based programs, use the formula:
 
$$\begin{array}{l} \text{Cost of attendance (COA)} \\ - \text{Expected family contribution (EFC)} \\ \hline = \text{Need} \end{array}$$
  - A student's need-based financial aid may not exceed "need" as calculated by the above formula.
- For the TEACH Grant, Direct Unsubsidized Loan, PLUS, and other non-need-based programs, use the formula:
 
$$\begin{array}{l} \text{Cost of attendance (COA)} \\ - \text{Estimated financial assistance (EFA)} \\ \hline = \text{Eligibility for non-need-based aid (subject to award limits)} \end{array}$$

## Individual Program Eligibility Requirements

- In addition to satisfying general student eligibility provisions, a student must meet the eligibility requirements of the individual Title IV aid program(s) from which he or she receives assistance.

# Criteria Not Specifically Checked but Must Be Resolved if Conflicting Information Exists

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## Conflicting Information

- Conflicting information is information obtained about a student, which is different from information previously available to the school, that impacts the student's eligibility for Title IV aid.

## Simultaneous Enrollment in an Elementary or Secondary School

- A student is ineligible for Title IV aid during any period he or she still is considered enrolled in elementary or secondary school.
- If the secondary school is giving the student credit for courses taken at the postsecondary school or considers the student to be enrolled, the student is ineligible for Title IV aid.

## Judgment Lien on Property for Debts Owed to United States

- A student who has property subject to a judgment lien for a debt owed to the U.S. is ineligible for Title IV aid.
  - A student may regain Title IV eligibility by paying the judgment in full or by making repayment arrangements satisfactory to the creditor.
- The FAFSA does not contain a certification statement regarding judgment liens, and schools are not required to collect a statement from students.

## Incarceration

- An incarcerated student is eligible for Federal Pell Grant funds only if he or she is not incarcerated in a federal or state penal institution.
- An incarcerated student in a federal or state prison is only eligible for Federal Supplemental Educational Opportunity Grant (FSEOG) and Federal Work-Study (FWS) funds.
- An incarcerated student is not eligible for Title IV loans.
- Incarceration is not checked via the application process.
  - A school is not required to verify whether the student is incarcerated unless it has conflicting information.
  - If the student was once, but is no longer incarcerated, the school may accept the student's written self-certification he or she is no longer incarcerated.

## Reporting Suspected Fraud

- If a school suspects a student may have engaged in fraud or other criminal misconduct in applying for Title IV aid, the school must refer this information to ED's Office of Inspector General (OIG) by:
  - Calling 1.800.MISUSED;
  - Sending an email to [oig.hotline@ed.gov](mailto:oig.hotline@ed.gov);
  - Completing an online Complaint Form available at: <http://www2.ed.gov/about/offices/list/oig/hotline.html>; or
  - Sending a letter to:  
Inspector General's Hotline  
Office of Inspector General  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202-1500

- A school should refer any case in which it suspects a student knowingly included false information on his or her application or related materials in order to obtain more Title IV assistance than he or she otherwise would have been entitled.
- A school is not required to make a determination of guilt.

## **Educational Coursework and Programs Affecting Student Eligibility**

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### **Correspondence Courses**

- A correspondence course is defined as a course offered by the school under which the school provides (by mail or electronic transmission) instructional materials, including examinations on the materials, to students who are separated from the instructor.
  - Interaction between the instructor and student is limited, is not regular and substantive, and is initiated primarily by the student.
  - The course is typically self-paced.
  - If a course is part correspondence and part residential training, the course is considered to be a correspondence course.
- If the course is delivered principally through distance education and leads to a certificate or degree offered by the school, the course is considered to be a distance education course, not a correspondence course.
- A student is eligible to receive Title IV assistance for a correspondence course only if the course is part of an eligible program leading to associate, baccalaureate, or graduate degree.

### **Distance Education Courses**

- A distance education course is defined as a course that uses one or more technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the instructor and the students either synchronously or asynchronously.
  - Accepted modes of delivery include:
    - ◆ The Internet;
    - ◆ One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
    - ◆ Audio conferencing; or
    - ◆ Video cassettes, DVDs, and CD-ROMs if they are used in conjunction with any of the above listed technologies.
- A student is eligible to receive Title IV assistance for a distance education course regardless of the type of credential the student will receive upon completion of his or her program of study.

### **Remedial Coursework**

- Remedial courses may be noncredit or reduced credit (i.e., no credit or reduced credit is given toward the certificate or degree).
- A student enrolled in remedial coursework is eligible for Title IV aid only if the student has been accepted into an eligible program and is taking the remedial courses within that program.
  - Remedial courses that are part of a program leading to a high school diploma may not be considered when determining a student's enrollment status or cost of attendance.
  - If the student's acceptance is conditioned on the basis of successfully completing the remedial coursework, the student is not eligible for Title IV aid for the remedial coursework.

- A student enrolled in a direct assessment program is eligible for Title IV aid for remedial coursework only if that coursework is offered in credit or clock hours.
- No more than one academic year's worth of remedial coursework may be counted in determining the student's enrollment status and cost of attendance.
  - One academic year's worth of coursework is 30 semester or trimester hours, 36 quarter hours, or 900 clock hours.
  - ESL courses do not count against the one-year remedial coursework limitation.

## ESL Programs and Coursework

- A student enrolled solely in an eligible ESL program is only eligible for Federal Pell Grant assistance.
  - An eligible ESL program is defined as a program that:
    - ◆ Consists solely of ESL coursework;
    - ◆ Leads to a degree, certificate, or other recognized credential; and
    - ◆ Admits only students, who the institution determines, need the ESL instruction to use already existing knowledge, training, or skills.
  - The school must obtain ED's determination that the program is an eligible program before awarding and disbursing Federal Pell Grant to students enrolled in the ESL program.
- A student may receive other Title IV assistance for ESL coursework that is part of a larger eligible program.
  - The ESL coursework would be considered remedial coursework.

## Direct Assessment Programs

- A direct assessment program, in lieu of earned credit or clock hours as the measure of the student's learning, uses a direct assessment of a student's learning, or recognizes the direct assessment of the student's learning by others.
- A school must obtain ED's approval of a direct assessment program before awarding or disbursing Title IV funds to students enrolled in that program.
  - If the program is approved by ED, Title IV aid may be awarded only for learning that results from instruction provided, or overseen, by the school.
  - Title IV funds cannot be awarded for any portion of the program based on:
    - ◆ Life experience or study prior to the student's enrollment in the program; or
    - ◆ Tests not associated with educational activities overseen by the school.

## Comprehensive Transition and Postsecondary Programs for Students with an Intellectual Disability

- A comprehensive transition and postsecondary program for students with an intellectual disability is defined as a degree, certificate, or nondegree program offered by the school that:
  - Is delivered to students physically attending the institution;
  - Is designed to support students with intellectual disabilities who are seeking to continue academic, career, technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment;
  - Includes an advising and curriculum structure; and
  - Requires students with intellectual disabilities to have at least half of their participation in the program, as determined by the school, focus on academic components through one or more of the following activities:
    - ◆ Taking credit-bearing courses with students without disabilities,

- ◆ Auditing or participating in courses with students without disabilities for which the student does not receive regular credit,
- ◆ Taking noncredit, nondegree courses with students without disabilities,
- ◆ Participating in internships or work-based training in settings with students without disabilities, and
- ◆ Participating in other coursework and activity opportunities with students without disabilities.
- A student with an intellectual disability is defined as a student:
  - With mental retardation or cognitive impairment characterized by significant limitations in:
    - ◆ Intellectual and cognitive functioning, and
    - ◆ Adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and
  - Who is or was eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA).
- A student with an intellectual disability enrolled in a comprehensive transition and postsecondary program establishes eligibility for Title IV aid if he or she meets all of the general student eligibility criteria in 34 CFR 668.32, except that the:
  - Program must be approved by ED;
  - Student does not have to be enrolled for the purpose of obtaining a degree or certificate;
  - Student is not required to have a high school diploma or its recognized equivalent;
  - Student must be making SAP as defined, by the school, within the context of the student's program; and
  - Institution must obtain:
    - ◆ A record from a local educational agency that the student is or was eligible for special education and related services under the IDEA, or
    - ◆ If that record does not identify the student as having an intellectual disability, documentation establishing the student has an intellectual disability.
- A student with an intellectual disability enrolled in a comprehensive transition and postsecondary program may only be awarded funds from the Federal Pell Grant, FSEOG, and FWS programs.

## Short-Term Programs

- For a student enrolled in a short-term program, Title IV eligibility is limited only to Direct Loan funds.
- An eligible short-term program is defined as a program that:
  - Provides at least 300, but less than 600, clock hours of instruction during a minimum of 10 weeks;
  - Provides undergraduate training that prepares the student for gainful employment in a recognized occupation;
  - Admits as regular students some persons who have not completed the equivalent of an associate degree;
  - Has completion and placement rates of at least 70 percent;
  - Is no longer than 50 percent of the minimum clock hours:
    - ◆ Required for training by the state in which the program is offered, if such a requirement exists, or
    - ◆ Established by a federal agency; and
  - Has been in existence for at least one year.

## Clock/Credit-Hour Conversion

- For certain credit-hour programs, a school must apply the clock/credit-hour formula to determine:
  - Whether the program is an eligible credit-hour program for Title IV purposes;
  - The length of the program; and
  - The amount of aid a student enrolled in the program may receive.
- The conversion formula must be used for all undergraduate programs measured in credit hours unless:
  - The program is at least two academic years in length and leads to an associate, baccalaureate, professional, or equivalent degree as determined by ED;
  - Each course within the program is acceptable for full credit toward the school's associate, baccalaureate, professional, or equivalent degree as determined by ED, provided the school's degree requires at least two academic years of study and the school demonstrates that students enroll in and graduate from the degree program; or
  - The program is offered by a public or private nonprofit hospital-based school of nursing that awards a diploma for successful completion of the program.
- For a program subject to the clock/credit-hour formula, a school must:
  - Determine the actual number of clock hours of instruction in the program;
  - Apply the appropriate conversion formula to convert the total number of clock hours back to a revised number of credit hours; and
  - Use the revised number of credit hours to determine the length of the program for Title IV purposes.
- A program is considered a clock-hour program for Title IV purposes if:
  - A program is required to be measured in clock hours when receiving federal or state licensure or approval, or completing clock hours is a requirement for graduates to apply for licensure or authorization students need to pursue their intended occupation:
    - ◆ Exception: A program is not considered a clock-hour program if there is a federal or state approval or licensure requirement that a limited component of the program (e.g., a practicum, internship, or clinical experience) must include a minimum number of clock hours;
  - The credit hours awarded for the program do not comply with the Title IV definition of a credit hour; or
  - The institution does not provide the clock hours that are the basis of the credit hours awarded for the program or each course in the program, and, except for excused absences, it requires attendance in the clock hours that are the basis of the credit hours awarded.

### *Clock/Credit-Hour Formula*

- Step 1: Determine the actual number of clock hours of instruction in the credit-hour program.
  - A clock hour is based on an actual hour of attendance.
  - Each hour may include a 10 minute break; however, a school may not schedule several hours of instruction without breaks and then count clock hours in 50-minute increments.
- Step 2: Apply the appropriate conversion formula to convert the total number of clock hours back to a revised number of credit hours; the results of applying the formula may not be rounded up.
  - For a program offered in semesters or trimesters, divide the number of clock hours in the program by 37.5 hours of instruction; or
  - For a program offered in quarters, divide the number of clock hours in the program by 25 hours of instruction.
- Step 3: Use the revised number of credit hours to determine the length of the program for Title IV purposes.
  - The number of clock hours of instruction per credit may be less than the hours specified in Step 2 if the school's accrediting or state agency has identified any deficiencies in its definition of a credit hour, so



long as the institution's student work outside of class combined with the clock hours of instruction meet or exceed the hours described in Step 2 and a:

- ◆ Semester or trimester hour includes at least 30 hours of instruction; and
  - ◆ Quarter hour includes at least 20 hours of instruction.
- For out-of-class student work, the minimum number of clock hours of instruction per credit in Step 2 may be less if the institution's accrediting or state agency has not identified any deficiencies with the institution's policies and procedures for determining credit hours that the institution awards for programs or courses.
    - Work outside of class combined with the clock hours of instruction must meet or exceed the numeric requirements (i.e., 37.5 or 25), and a:
      - ◆ Semester or trimester hour must include at least 30 clock hours of instruction, and
      - ◆ Quarter hour must include at least 20 hours of instruction.
    - The amount of out-of-class work in a particular course does not carry over to other courses or activities.
    - Pages 2-31 and 2-32 of the 2013–14 *FSA Handbook* contain an example illustrating a method for accounting for out-of-class work.

### *Clock/Credit-Hour Formula Example*

The school has a one-year, credit-hour certificate court reporting program, which it offers in semesters. The program does not contain any out-of-class student work. Students enrolled in the program complete 24 semester hours over 33 weeks. Because the program does not lead to an associate degree or higher, and is not fully transferable, the clock/credit-hour conversion requirement applies.

- Step 1: Determine the actual number of clock hours of instruction in the credit-hour program.
  - Based on the actual hours of attendance, the school determines the program has 600 clock hours of instructional time.
- Step 2: Apply the appropriate conversion formula to convert the total number of clock hours back to a revised number of credit hours.
  - $600 \text{ clock hours} \div 37.5 = 16 \text{ semester hours}$
- Step 3: Use the revised number of credit hours to determine the length of the program for Title IV purposes.
  - For Title IV purposes, the program is 16 semester hours and 33 weeks.

### ***Impact on Program Eligibility***

- A school must use the result from the clock/credit-hour formula to determine whether the program is an eligible program (i.e., the program must meet the regulatory minimum length, in both credit hours and weeks of instructional time, of an eligible program).
- A program is an eligible program, if the program's length is at least:
  - 16 semester or trimester hours and 15 weeks of instructional time;
  - 24 quarter hours and 15 weeks of instructional time; or
  - For a program that admits as regular students only individuals who have completed the equivalent of an associate degree, 8 semester/trimester or 12 quarter hours, and 10 weeks of instructional time.
- In the preceding example, the court reporting program is an eligible program because it offers 16 semester credit hours over a 33-week period.



## ***Impact on Student Eligibility***

- A school must use the results of the clock/credit-hour conversion formula to determine not only the length of the program, but also the enrollment status for each student enrolled in the program.
- For the Federal Pell Grant, IASG, TEACH Grant, or subsidized or unsubsidized Direct Loan programs, the resulting credit hours could impact the student's eligibility.
  - If the results reduce the length of the program to less than an academic year, the amount of a student's Federal Pell Grant, IASG, and TEACH Grant is reduced because the student is not full time.
    - ◆ In the previous example, the reduction from 24 to 16 credit hours means the students enrolled in that program are enrolled for 8 semester hours (or half time), not 12 semester hour (full time) per payment period.
  - For subsidized or unsubsidized Direct Loans, if the results reduce the:
    - ◆ Length of the program to less than an academic year, the amount of a student's loan must be prorated; or
    - ◆ Student's enrollment status to less than half time, the student is ineligible for the loan.
- For the FWS and FSEOG programs, there is no impact on the amount of a student's award.
- For the Federal Perkins Loan Program, there is no impact on the amount of the student's loan; however, the terms of the student's Master Promissory Note could be affected if the student's enrollment changes to less than half time.

## **Changes in Student's Eligibility Status**

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### **Gaining Eligibility**

- If a student, who lost eligibility by not maintaining SAP, regains eligibility under the school's SAP policy or by an appeal, the school:
  - May pay Title IV funds for only the payment period in which the student regains eligibility; and
  - Cannot pay Title IV funds for any payment period during which the student failed to meet the school's SAP standards.
- If the student gains eligibility during the award year after resolving an eligibility issue related to SSN, citizenship, or Selective Service registration, the student gains Title IV eligibility for the entire award year.
- If the student gains eligibility during the award year after resolving an eligibility issue other than SAP, SSN, citizenship, or Selective Service registration, the student may receive:
  - Federal Pell Grant, IASG, TEACH Grant, and campus-based funds for the entire payment period in which he or she becomes eligible; and
  - Direct Loan funds for the period of enrollment (i.e., loan period) in which he or she becomes eligible.

### **Losing Eligibility**

- A student cannot receive subsequent Title IV aid disbursements after becoming ineligible.
  - Exception: If a student loses eligibility due to a change in citizenship status during the award year or period of enrollment, the school is not required to take action to prevent the student from receiving subsequent disbursements for that award year. For the following award year, the student is ineligible for Title IV aid unless the problem with his or her citizenship status is resolved.

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# References for Student Eligibility

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The following is a list of resources used to develop these materials that you may find helpful if you need additional information or clarification on a topic covered in this training module.

## Law

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The Higher Education Act of 1965, as amended

- Section 484 – Student Eligibility

## Regulations

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34 CFR 600.2 – Definitions

34 CFR 668 Subpart A – General Provisions

34 CFR 668 Subpart C – Student Eligibility

34 CFR 668 Subpart I – Immigration-Status Confirmation

34 CFR 668 Subpart O – Financial Assistance for Students with Intellectual Disabilities

34 CFR 674.2 – Definitions

34 CFR 674 Subpart B – Terms of Loans

34 CFR 685.102 – Definitions

## *Federal Registers*

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*Federal Register*, 9/27/12, p. 59315 – Waivers and Modifications of Title IV Statutory and Regulatory Provisions Under the Higher Education Relief Opportunities for Students (HEROES) Act of 2003

*Federal Register*, 10/29/10, pp. 66848 to 66849, 66880 to 66887 – Credit to Clock Hour Conversion and Satisfactory Academic Progress

*Federal Register*, 6/18/10, p. 34812 and pp. 34820 to 34823 – Credit to Clock Hour Conversion and Satisfactory Academic Progress

*Federal Register*, 8/10/99, p. 43432 – Impact of Bankruptcy Reform Act of 1994 on Student Eligibility

## Dear Colleague Letters

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GEN-14-06 – State authorized examinations released in January 2014

GEN-13-10 – Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs

GEN-13-09 – Students With an Unusual Enrollment History Flag — “C” Code on the ISIR

GEN-13-02 – Regaining Title IV Eligibility After Exceeding Loan Limits and Treatment of Loan Funds When a Student Fails to Begin Attendance

GEN-12-09 – Title IV Eligibility for Students Without a Valid High School Diploma

GEN-12-01 – Changes Made To The Title IV Student Aid Programs By The Recently Enacted Consolidated Appropriations Act, 2012

GEN-11-12 – Trial Periods of Enrollment

GEN-11-08 – Ability-to-Benefit (ATB) Provisions Published in Final Regulations on October 29, 2010

GEN-11-01 – Guidance Regarding Comprehensive Transition and Postsecondary (CTP) Programs for Students With Intellectual Disabilities

GEN-10-07 – Eligibility of Battered Immigrants—Qualified Aliens

GEN-06-09 – Victims of Human Trafficking

GEN-02-11 – Home Schooled Students

GEN-01-09 – NSLDS Transfer Student Monitoring Process

GEN-95-40 – Bankruptcy Reform Act of 1994

## **Electronic Announcements**

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Electronic Announcement, 3/22/12 – New Document Verification Request (G-845) Form Available

Electronic Announcement, 10/07/11– Operational Implementation Guidance - Implementation of Federal Student Aid System and Software Updates on October 23, 2011 for New SSA Guidelines

Electronic Announcement, 5/13/10 – Update on Operational Implementation of Increased Title IV Student Assistance to Children of Certain Deceased Members of the U.S. Military

Electronic Announcement, 11/23/09 – Requesting Status Information Letters from Selective Service

Electronic Announcement, 11/6/09 – Operational Implementation of Increased Title IV Student Assistance to Children of Certain Deceased Members of the U.S. Military

## ***2014–15 FSA Handbook*** [most recent published as of April 15, 2014]

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- Application and Verification Guide

## ***2013–14 FSA Handbook***

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- Volume 1 – Student Eligibility
- Volume 2 – School Eligibility and Operations
- Volume 4 – Processing Aid and Managing FSA Funds

## **2011–12 FSA Handbook**

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- Volume 1 – Student Eligibility, Chapter 1, Ability to Benefit, pages 1-8 to 1-11

### **Other Resources**

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*The ISIR Guide, 2014–15*

*2014–15 SAR Comment Codes and Text (March 2014 Update)*

*National Student Loan Data System User Guide for Transfer Student Monitoring on the Web, April 2010*

*NSLDS Newsletter, Number 41 – Unusual Enrollment History (UEH) Indicator, Modifications to Aggregate Calculations*

*NSLDS Newsletter, Number 23 – Transfer Student Monitoring Changes*

*NSLDS Newsletter, Number 11 – Consolidation Loans and Aggregate Calculations*

*NSLDS Newsletter, Number 8 – Determining Aggregate Loan Limits for Undergraduate Students with Graduate Level Loans*

*Selective Service System – Frequently Asked Questions*

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# Module 3 Student Eligibility

National Association of Student  
Financial Aid Administrators Presents ...

**Module 3**

**Student Eligibility**

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**Student Eligibility for Title IV Aid**

Students must meet several general eligibility requirements

- Some requirements are student related
- Others relate to the program of study

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**General Student Eligibility Requirements**

Criteria categories:

1. Checked via application process
2. Checked and monitored by school
3. Not specifically checked, but must be resolved if conflicting information exists

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# Module 3 Student Eligibility

## DHS Primary Verification

- Database match between Central Processing System (CPS) and Department of Homeland Security (DHS) to confirm eligible noncitizen status
- If primary verification confirms eligible noncitizen status, no further proof is required

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## DHS Automated Secondary Confirmation

- CPS submits automated DHS secondary confirmation request to DHS if primary verification failed and an Alien Registration Number was provided on the Free Application for Federal Student Aid (FAFSA)
- Usually completed within 3 days

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## Manual Secondary Confirmation

School must initiate if:

- Eligible noncitizen status is not confirmed via DHS automated secondary confirmation;
- Results of automated secondary confirmation are not received after at least 5, but not more than 15, business days of receiving the Institutional Student Information Record (ISIR);
- School has conflicting information; or
- School believes student information is incorrect

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# Module 3 Student Eligibility

## Social Security Number

Three types of Social Security Administration (SSA) database matches:

- Student's Social Security Number (SSN)
- Parent's SSN
- Student's date of death

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## National Student Loan Data System

Student and parent PLUS borrower must:

- Not be in default on a Title IV loan
- Not owe a Title IV overpayment
- Not have exceeded Title IV loan limits
- Have fully repaid any fraudulently obtained Title IV funds

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## Drug Convictions

- Two sets of student eligibility requirements apply
- Different means used to determine whether student meets the requirements
  - Department of Justice database match
  - Question 23 on 2014–15 FAFSA

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# Module 3 Student Eligibility

## Institutional Eligibility Regulations

School may not admit as a regular student persons who:

- Do not have high school diploma or its recognized equivalent
- Are below the age of compulsory attendance in the state in which school is located

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## Short-Term Programs

To be eligible, short-term program must:

- Admit as regular students some persons who have not completed equivalent of associate degree
- Have completion and placement rates of at least 70%
- Not be more than 50% longer than minimum training program required for specified occupation
- Have been in existence for at least 1 year

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NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

1101 CONNECTICUT AVENUE NW, SUITE 1100  
WASHINGTON, DC 20036-4303

202.785.0453 FAX. 202.785.1487 WWW.NASFAA.ORG