

Verification and UEH

Verification and Unusual Enrollment History (UEH)

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U.S. Department of Education  
January 29, 2016

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Agenda

- 2016-17 Verification Policy Changes
- 2016-17 Verification Operational Changes
- 2016-17 Unusual Enrollment History Changes
- Important Dates

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Verification

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**Verification – Overview**

History

- Last comprehensive look in 1985
- Program Integrity regulations—October 29, 2010
- Move to customized verification
- Effective for the 2012-13 award year

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**Verification – Policy**

For the 2012-13 award year

- Retained the long-standing five items and added SNAP and child support paid, if reported on the ISIR

For the 2013-14 award year

- Introduced the concept of verification groups
- Added high school completion and identity/statement of educational purpose as verification items

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**Verification – Policy**

For the 2014-15 award year

- Eliminated SNAP (V2) as a separate verification group
- Added household resources group (V6)
- Added other untaxed income and benefits as a verification item

For the 2015-16 award year

- No changes

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**Verification – Changes 2016-17**

- Changes for 2016-17
  - Same data elements as for 2015-16 award year
  - Some modifications and clarifications to acceptable documentation
  - Eliminated Child Support Paid (V3) as a separate verification group
  - In limited circumstances, an applicant’s Verification Tracking Group could change

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**Verification – Acceptable Documentation**

- Acceptable Documentation
  - Tax filers in a U.S. territory or commonwealth must submit a transcript of their tax return if it is available for free from the taxing authority
  - Nontax filers in the Freely Associated States, a U.S. territory or commonwealth, or a foreign country must submit a copy of their Wage and Tax statement for each source of employment income for 2015 and a signed statement identifying all income and taxes for 2015

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**Verification – Acceptable Documentation**

- Tax filers and Nontax filers—if a copy of the tax return was not retained and cannot be located by the IRS (or other relevant taxing authority) must submit:
  - Copy of all relevant W-2s, a wage and income transcript, or an equivalent document
  - Signed statement that the individual did not retain a copy of his or her 2015 tax account information, and
  - Documentation from the IRS or other relevant taxing authority that indicates that the individual’s 2015 tax account information cannot be located

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**Verification – Acceptable Documentation**

- Victims of IRS tax-related identity theft must submit:
  - A Tax Return DataBase View (TRDBV) transcript and
  - A signed and dated statement from the tax filers that they are victims of IRS tax-related identity theft and that the IRS has been made aware of this
- Tax filers who filed an amended tax return must submit:
  - A transcript from the IRS that lists tax information of the tax filer and
  - A signed copy of the IRS Form 1040X that was filed

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**Verification – Acceptable Documentation**

- High school completion status
  - If the institution successfully verified and documented high school completion status in a prior award year, it does not have to re-verify this item
  - DD Form 214 is acceptable documentation and can be used to verify high school completion status
  - If documentation is not available, alternative documentation may not include self-certification EXCEPT in:
    - Rare cases where it is impossible for a refugee, an asylee, or a victim of human trafficking to obtain documentation of his or her completion of a secondary school education in a foreign country

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**Verification – Acceptable Documentation**

- Child support paid
  - Removed a separation agreement or divorce decree from acceptable documentation

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**Verification – Acceptable Documentation**

- Identity/Statement of Educational Purpose
  - Clarified that the valid government-issued photo identification used to verify identity must not have expired

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**Verification – Changes 2016-17**

- Eliminated Verification Tracking Group V3 (Child Support Paid)
- Applicants may be moved from previously assigned Groups V1, V4, and V6 to Verification Tracking Group V5
  - Applicant is only required to verify the additional items in V5 that were not previously verified

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**Verification – Changes 2016-17**

- If the applicant is moved to Verification Tracking Group V5, no additional disbursements of any Title IV aid may be made until verification is satisfactorily completed
- If verification is not satisfactorily completed, the student is liable for the full amount of Title IV aid disbursed
- The institution is not liable

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**V1 – Tax Filers**

- Adjusted Gross Income
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Credits

**Documentation:**

- IRS DRT;
- Tax Return Transcripts;
- Alternate documentation where allowed (e.g. amended returns, foreign returns, etc.)

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**V1 – Non-Tax Filers**

- Income earned from work

**Documentation:**

- Signed statement certifying –
  - Individual has not filed and not required to file a 2015 tax return;
  - Sources of income earned from work and amounts of income from each source for tax year 2015; and
- Copy of IRS Form W-2 for each source of employment income received for tax year 2015

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**V1 – Non-Tax Filers**

- If an institution questions a claim that the tax filer is not required to file, must require applicant to submit a "Verification of Nonfiling Letter"
  - Form 4506-T and checking box 7
  - "Verification of Nonfiling Letter" for 2015 tax year generally not issued until after June 15, 2016

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**V1 – All Applicants**

- Number in Household and Number in College

**Documentation:**

- Household size – signed statement (name, age, relationship)
  - Not required if:
    - Dependent household size reported is two and parent is unmarried or three if the parents are married or unmarried and living together
    - Independent household reported is one and applicant is unmarried or two if the applicant is married
- Number in College – signed statement (name of household member attending at least half-time and eligible institution name)
  - Not required if reported number is one (student)

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**V1 – All Applicants**

- SNAP Benefits (if reported on ISIR)

**SNAP Documentation:**

- Statement signed by applicant/parent affirming SNAP benefits received by someone in household during 2014 and/or 2015
- If school has concerns with accuracy of information, the institution must obtain documentation from the agency that issued the SNAP benefits

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**V1 – All Applicants**

- Child Support Paid (if reported on ISIR)

**Documentation:**

- Statement signed by applicant/parent certifying–
  - Amount of child support paid;
  - Name of the person who paid the child support;
  - Name of the person to whom child support was paid; and
  - *Names and Ages* of the children for whom child support was paid

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**V1 – All Applicants**

- If the institution has reason to believe that the information provided in the signed statement is inaccurate, the applicant must provide the institution with supporting documentation, such as checks, money order receipts, or similar records of electronic payments having been made

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**V4 – Custom**

- High School Completion Status
- Identity/Statement of Educational Purpose
- SNAP Benefits (if reported on ISIR)
- Child Support Paid (if reported on ISIR)



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**High School Completion Status**

- High school completion status

**Documentation:**

- High school diploma; or
- Final official high school transcript showing date diploma awarded; or
- “Secondary school leaving certificate” for students who completed secondary education in foreign country and unable to get copy of high school diploma/transcript

- **Note:** If prior to being selected for verification, an institution already obtained HS completion status records for other purposes, the institution may rely on those records as long as it meets ED HS completion criteria

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**High School Completion Status**

- Recognized equivalent of a HS diploma

**Documentation:**

- Copy of the student's General Educational Development (GED) certificate, an official GED transcript that indicates the student passed the exam, or a state-authorized HS equivalent certificate; or
- Academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; or
- Student excelled academically in HS and met all criteria to be admitted into a two-year degree program or higher

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**High School Completion Status**

- Test transcripts of State-authorized examinations

**Documentation:**

- Test transcripts of State-authorized examinations (e.g., GED test, HiSET, TASC, or other State-authorized high school equivalency examinations) are acceptable documentation of high school completion only if:
  - The official test transcript specifically indicates that a State has determined that the test results are considered by the State to meet its requirements of high school equivalency; or
  - The official test transcript includes language that the final score is a passing score

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**High School Completion Status**

- Homeschooled

**Documentation:**

- Credential, transcript, or the equivalent, signed by the parent or guardian, that lists the secondary school courses completed by the applicant and documents the successful completion of a secondary school education; or
- A secondary school completion credential for home school provided for under State law

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**Identity/Statement of Educational Purpose**

- Students that appear in person

**Documentation:**

- Present to an institutionally authorized individual
  - An unexpired valid government-issued photo identification; and
  - A signed statement of educational purpose *provided by ED, cannot be modified*
- Maintain an annotated copy of the identification:
  - The date documentation was received; and
  - The name of the institutionally authorized individual that obtained the documentation

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**Identity/Statement of Educational Purpose**

- Student unable to appear in person

**Documentation:**

- Must provide the institution—
  - A copy of an unexpired valid government-issued photo identification AND
  - An *original*, notarized statement of educational purpose signed by the applicant, **cannot** be faxed or scanned
- Maintain a copy in the file
- After examining the *original* Statement of Educational Purpose for accuracy and completeness, the institution may convert it into an electronic record

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**V5 – Aggregate**

- High School Completion Status
- Identity/Statement of Educational Purpose

**AND**

- All items indicated-Tax Filer (V1)
- All items indicated-Non-Tax Filer (V1)

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**V6 – Household Resources**

- All items indicated-Tax Filer (V1); or
- All items indicated-Non-Tax Filer (V1);

AND

- Other untaxed income from 2016-17 FAFSA:
  - Payments to tax-deferred pension and savings
  - Child support received
  - Housing, food, and other living allowances paid to members of the military, clergy, and others
  - Veterans noneducation benefits
  - Other untaxed income
  - Money received or paid on the applicant's behalf

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**V6 – Household Resources**

- Other Untaxed Income Documentation:

Documentation

- Signed statement listing –
  - Sources and amounts of income for tax year 2015; and
- Copy of IRS W2s for sources of employment income received for tax year 2015, where applicable

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**V6 – Household Resources**

- If school determines amounts provided do not appear to provide sufficient support for family members reported, the applicant (and parent/spouse) must:
  - Provide additional signed statement listing other resources used to support family (may include items not required to be reported on FAFSA or other verification forms)
  - Explain how financially supported during 2015 calendar year

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**V6 – Household Resources**

- Institutions should use reasonable judgment when evaluating the validity of the income information provided by students and parents who are placed in Verification Tracking Group V6
- “Reasonable” may differ among institutions
- Institutions may choose to accept a signed low-income statement, an income-to-expenses comparison, or other documentation as determined by the institution

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**Verification – Hot Topics**

- Amended Tax Returns
- Transcript Requests
- Identity Theft

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**Amended Tax Returns**

- If the institution is aware that an amended tax return was filed, to complete verification, the applicant must submit—
  - Transcript obtained from the IRS that lists tax information for the filer(s) for 2015, and
  - A signed copy of IRS Form 1040X that was filed with the IRS
  - Refer to Dear Colleague Letter – GEN-15-11 and the Verification Questions and Answers

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### Transcript Requests – 2016-17

Transcript Requests

- Online **Get Transcript by Mail**,
- Automated phone tool (1-800-908-9946)
- Paper Form 4506-T or 4506T-EZ generate a paper transcript
- (Refer to Appendix A of the 2016-17 Verification Suggested Text)



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### Identity Theft – 2016-17

A tax filer who is unable to obtain an IRS Tax Return Transcript because of *IRS identity theft*, calls a special IRS group at 1-800-908-4490

- Upon verification of identity, the tax filer can obtain a paper copy of an alternative document unique to identity theft issues (Tax Return Data Base View (TRDBV))
- The TRDBV is an official transcript that can be submitted to the school to meet verification requirements
- (Refer to Dear Colleague Letter – GEN-15-11)



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### Verification – Overview Data

| Verify Track Flag     | 2014-15 Cycle     |               |
|-----------------------|-------------------|---------------|
|                       | Number            | Percentage    |
| <b>18-Month Total</b> |                   |               |
| V1                    | 4,523,508         | 22.0%         |
| V3                    | 68,495            | 0.3%          |
| V4                    | 417,852           | 2.0%          |
| V5                    | 110,786           | 0.5%          |
| V6                    | 220,450           | 1.1%          |
| No Flag               | 15,220,838        | 74.0%         |
| <b>Total</b>          | <b>20,561,929</b> | <b>100.0%</b> |

- For the 2014-15 cycle, approximately 5.3 million applicants (26.0%) were selected for verification; to date for 2015-16, approximately 4.9 million applicants (28%) have been selected



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**Verification – Operations**

Verification Tracking Selection Criteria:

| Verification Tracking Flag | Verification Tracking Group            | Verification Selection Criteria  |
|----------------------------|--|--|
| V1                         | Standard Verification Group            | Record selected because conditions based on statistical analysis error-prone risk model were met                       |
| V2                         | Reserved for FSA Use Only              | N/A  |
| V3                         | Reserved for FSA Use Only              | N/A  |
| V4                         | Custom Verification Group              | Record selected for Identity criteria  |
| V5                         | Aggregate Verification Group           | Record selected for combination of Identity criteria, "Standard Verification" criteria and Total Income/Household Size |
| V6                         | Household Resources Verification Group | Record selected for Total Income and Household size  |

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**Verification – Operations**

- Based on the data on the record and if a record was selected for verification and financial data was transferred from the IRS, then either:
  - No fields will need to be verified based on the values in Marital Status, Household Size, and Number in College
  - Only Household Size and Number in College

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**Verification – Tracking Group**

- Beginning in 2016-17, a student may go to tracking group V5 from V1, V4, or V6
- Verification can be set on the application or correction
- Verification Selection Change Flag
  - Y: indicates verification was not set and now record is selected for verification
  - C: indicates the verification tracking group has changed. This "C" is transaction specific.

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**Same for 2016-17 – Not Selected**

If the applicant would have been selected based on standard verification criteria and

- Tax return data for the student and parent(s) for a dependent record or for the independent student
  - Retrieved from the IRS and not changed on the FAFSA
  - Responses to Household Size and Number in College questions seems logical
  - Record will **not** be selected for verification

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**Same for 2016-17 – Not Selected**

• Logical answers include the following:

Dependent Students

Independent Students

| Parents' Marital Status | Household Size | Number in College |
|-------------------------|----------------|-------------------|
| Married                 | 3              | 1                 |
| Not Married             | 2              | 1                 |

| Student's Marital Status | Household Size | Number in College |
|--------------------------|----------------|-------------------|
| Married                  | 2              | 1                 |
| Not Married              | 1              | 1                 |

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**IRS Data Retrieval Tool**

- Applicants selected for verification – V1-Standard Verification
  - Who transfer their income tax return information **unchanged** using the Internal Revenue Service Data Retrieval Tool (IRS DRT) –
    - When initially completing the FAFSA using FAFSA on the Web (FOTW)
    - When making corrections on FOTW
  - Are considered to have verified the FAFSA IRS information
    - Adjusted Gross Income, taxes paid, and the applicable untaxed income items and education credits
  - Unless changes were made to the transferred information or institution has reason to believe that the information transferred is inaccurate
  - School **only needs to verify** # in HH and # in College

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### IRS Data Retrieval Tool

- IRS Request Flags

| IRS Request Flag | Description   |
|------------------|---|
| Blank            | IRS Data Retrieval Tool not available   |
| 00               | Student/Parent was ineligible to use the IRS Data Retrieval Tool  |
| 01               | Student/Parent was presented with the IRS Data Retrieval Tool and elected to use it, but did not transfer IRS data into the FAFSA |
| 02               | IRS data was transferred and was not changed  |
| 03               | IRS data was transferred and changed  |
| 04               | IRS data was transferred and then changed on a subsequent transaction   |
| 05               | Student/Parent was presented with the IRS Data Retrieval Tool and elected not to use it   |
| 06               | IRS data was transferred, but a subsequent change made the student/parent ineligible to use the IRS Data Retrieval Tool           |

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### Verification – Operations

- Once a record is selected for verification:
  - Verification selection will not be removed
  - Verification selection reason can only change if the record moves from V1,V4, or V6 to V5
  - Verification will not be removed even if verification reason no longer exists

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### Communication with Students

Current SAR comments:

- Dependent Student (170)
  - Your FAFSA has been selected for a review process called verification. Your school has the authority to request copies of certain financial documents from you and your parent(s).
- Independent Student (171)
  - Your FAFSA has been selected for a review process called verification. Your school has the authority to request copies of certain financial documents from you (and your spouse).

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### Verification and UEH

#### FAA Access – Identity Verification Results

- In 2014-15 an Identity Verification Results reporting function was added to FAA Access
- Schools report the identity verification results for students who have been selected for verification under V4 or V5
- Schools should be reporting this information on a regular basis
- (Refer to Electronic Announcement posted November 6, 2014)




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#### FAA Access – Identity Verification Results

- FAA have multiple options for loading Identity Verification Results


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#### FAA Access – Identity Verification Results

- FAAs can manually enter SSNs/Name ID/ Verification Results from a dropdown menu on this page


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### FAA Access – Identity Verification Results

- FAAs can upload a flat file of SSNs/Name ID/ Verification Results from their database

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### Verification – Resources

- 2016-17
  - Federal Register Notice, published June 26, 2015, Free Application for Federal Student Aid (FAFSA) Information To Be Verified for the 2016-17 Award Year
  - Dear Colleague Letter GEN-15-11, Published June 29, 2015, 2016-17 Award Year: FAFSA Information to be Verified and Acceptable Documentation

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### Verification – Resources

- 2016-17
  - 2016-17 Verification Suggested Text and Availability of 2015 IRS Tax Information; Electronic Announcement Published on November 18, 2015  
<http://ifap.ed.gov/eannouncements/111815VerificationSuggestedTextAvailability2015IRSTaxInfo20162017.html>
  - Program Integrity Q & A Website (verification topic)  
<http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>  
 OR link to the Program Integrity Q & A Web site via the Information for Financial Aid Professionals (IFAP) Home page:

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For Discussion Purposes Only

Verification and UEH

**Unusual Enrollment History**

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**Unusual Enrollment History (UEH)**

- Beginning with the 2013-14 award year, the Department added an Unusual Enrollment History (UEH) flag that indicates that a student has an unusual enrollment history based on the receipt of Federal Pell Grant (Pell Grant) funds
- We added the flag to address possible fraud and abuse in the Title IV student aid programs

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**Unusual Enrollment History (UEH)**

- We are concerned about an enrollment pattern in which a student attends an institution
  - long enough to receive Title IV credit balance funds,
  - leaves without completing the enrollment period,
  - enrolls at another institution, and
  - repeats the pattern of remaining just long enough to collect another Title IV credit balance without having earned any academic credit

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### Verification and UEH

**UEH – Overview**

- Some students who have an unusual enrollment history have legitimate reasons for their enrollment at multiple institutions
- However, such an enrollment history requires a review to determine whether there are valid reasons for the unusual enrollment history
- Resolution of a UEH flag is separate and distinct from verification

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**UEH – Current**

- For 2015-16, Pell Grant and Direct Loan disbursement information was evaluated for the past four award years
- Loans do not include Direct Consolidation, Parent PLUS Loans, or Campus-Based Loans (e.g., Perkins)
- FAFSA filers were assigned a UEH Flag of 'N,' '2' or '3', based on the number of Pell Grant/Loan disbursements that a filer received compared to the number of schools that the individual was awarded aid

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**UEH – Current**

- A UEH Flag value of 'N' indicates that there is no unusual enrollment history issue and, thus, no 'C' Code, no comments, and no action required by the institution
- A UEH Flag with a value of '2' indicates an unusual enrollment history that requires review by the institution of the student's enrollment records
- An example of an enrollment pattern that generates a UEH Flag value of '2' would be when the student received Pell Grant funds, Pell and Loans, or Loan only at three institutions over two award years

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**UEH – Current**

- A UEH Flag with a value of '3' indicates that the institution must review academic records for the student and, in some instances, must collect additional documentation from the student
- An example of an enrollment pattern that generates a UEH Flag value of '3' would be when the student received Pell Grant or Direct Loan funds at three or more institutions in one award year
- Note that there is no UEH Flag value of '1'

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**UEH – Resolution**

- Resolving Unusual Enrollment History Flags
- UEH Flag value is 'N': No action is necessary as the student's enrollment pattern does not appear to be unusual
- UEH Flag value is '2': The institution must review the student's enrollment and financial aid records to determine if, during the four award year review period (Award Years 2011-12, 2012-13, 2013-14, and 2014-15), the student received a Pell Grant/Direct Loan at the institution that is performing the review for 2015-16. For 2014-15 and prior only three award years are reviewed

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**UEH – Resolution**

- If so, no additional action is required unless the institution has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds
- If not, the institution must follow the guidance that is provided for a UEH Flag of '3'

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Verification and UEH

**UEH – Resolution**

- Resolving Unusual Enrollment History Flags
  - UEH Flag value is '3': The institution must review the student's academic records to determine if the student received academic credit at the institutions the student attended during the four award year period (Award Years 2011-12, 2012-13, 2013-14, and 2014-15)
  - Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell Grant/Direct Loan funding over the past four award years (2011-12, 2012-13, 2013-14, and 2014-15) for 2015-16. For 2014-15 and prior only three award years are evaluated

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**UEH – Resolution**

- Resolving Unusual Enrollment History Flags
  - Based upon academic transcripts it may already possess, or by asking the student to provide academic transcripts or grade reports, the institution
    - Must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant or loan funds. For 2015-16 review four award years and for 2014-15 and prior review three award years and only Pell Grants
    - Academic credit is considered to have been earned if the academic records show that the student completed any credit-hours or clock-hours

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**UEH – Resolution**

- Academic Credit Earned
  - If the institution determines that 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 that the student is one who enrolls just to receive the credit balance

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**UEH – Resolution**

- Academic Credit Not Earned
  - If the student did not earn academic credit at a previously attended institution 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
  - The institution must determine whether the documentation supports
    - the reasons given by the student for the student's failure to earn academic credit; **and**
    - that the student did not enroll only to receive credit balance funds

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**UEH – Resolution**

- Justification for UEH
  - Personal reasons
    - Illness, a family emergency, a change in where the student is living, and military obligations
  - Academic reasons
    - The student might explain that the first enrollment was at an institution that presented unexpected academic challenges, or
    - The academic program did not meet the student's needs, as determined by the student
  - The institution should, to the extent possible, obtain third party documentation to support the student's claim

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**UEH – Eligibility after Resolution**

- Approval of Continued Eligibility
  - You can establish an academic plan (ex. SAP appeal plan) and/or;
  - Counsel student on Pell Grant duration of eligibility provisions (LEU)
- Denial of Continued Eligibility
  - You must deny additional Title IV aid if no academic credit was earned at one or more institutions and no documentation or acceptable explanation was provided for each failure
  - Students can appeal the denial with the institution (ex. SAP determinations)

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**UEH – Eligibility after Resolution**

- Regaining Aid Eligibility
  - If aid is denied, you must give the student information on how to regain eligibility
  - Successful completion of academic credit is the basis for a student's request for renewal of eligibility
    - This can include meeting the requirements of an academic plan that you establish with the student
  - Pell Grant eligibility and campus-based aid begin with the payment period in which the student meets the eligibility requirements (following the period of ineligibility)
  - Direct Loan eligibility is retroactive to the beginning of the enrollment period

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**UEH – FAQ**

- Circumstances when a student's 2015-16 ISIR included a UEH Flag of '2' or '3', but the UEH Flag value is 'N' on the student's 2016-17 ISIR
  - If you have previously resolved the 2015-16 UEH issue, there is no need for any further review
  - If you have not satisfactorily resolved the 2015-16 UEH issue, you should, but are not required to, hold disbursement of Title IV aid for 2016-17 until you resolve the earlier UEH issue
  - In doing so, you must review the student's academic record for the 2012-13, 2013-14, 2014-15, and 2015-16 award years

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**UEH – FAQ**

- Circumstances where you suspect that a student for whom the Department did not assign a UEH Flag of '2' or '3' on his ISIR may be applying for and receiving Title IV aid for purposes other than to provide financial support for postsecondary education
  - In such instances, you may choose to hold disbursement of Title IV aid until you review the academic history of the student
  - In doing so, you must document the reasons why you took this action, as well as the specific steps the institution took to resolve the institutional selection for UEH review

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### UEH – Operations

#### Unusual Enrollment History Flag

| NSLDS Unusual Enrollment History Flag | Description  | SAR C Flag? | SAR Comment |
|---------------------------------------|--|-------------|-------------|
| 1                                     | For Federal Student Aid Use Only   | N/A         | N/A         |
| 2                                     | Unusual Enrollment History 2 (Possible enrollment pattern problem, school may need to resolve) | Yes         | 359         |
| 3                                     | Unusual Enrollment History 3 (Questionable enrollment pattern, school must resolve)            | Yes         | 360         |
| N                                     | Enrollment pattern not unusual (No school action required)                                     | No          | N/A         |
| Blank                                 | Record not sent for match  | No          | N/A         |

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### UEH – Operations

#### Unusual Enrollment SAR Comment

- SAR comments and the SAR C Flag will be generated for flags 2 and 3; resolution guidance provided to schools

| Comment No. | SAR Comment  | School Action to include  |
|-------------|--|---|
| 359         | Your school may request additional information to determine your eligibility for federal student aid.<br>Note: This comment will generate a SAR C flag as already documented.  | Action depends on whether the school is a new school for the applicant for 2016-2017. If not a new school, school not required to take any action but may look into the applicant's enrollment history. If new school for applicant, school must take certain actions that will be developed by FSA and OPE policy. |
| 360         | Based upon data provided by the National Student Loan Data System (NSLDS), your school will request additional information to determine your eligibility for federal student aid and before disbursement of funds can be made.<br>Note: This comment will generate a SAR C flag as already documented. | School must take certain enhanced actions that will be developed by FSA and OPE policy.   |

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### UEH – Resources

- Dear Colleague Letter GEN-13-09, Published March 8, 2013, 2013-14 Award Year: Students with an Unusual Enrollment History Flag – 'C' Code on the ISIR
- Dear Colleague Letter GEN-15-05, Published March 16, 2015, 2015-16 Unusual Enrollment History Flag
- 2015-16 and 2016-17 ISIR Guide

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**Important Dates**

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**Important Dates (cont.)**

January 2016

- Distribution of 2016-2017 Renewal FAFSA Reminders Electronic Announcement (likely the week of 1/18/2016)
- Final 2016-2017 Application Processing System Specifications for Software Developers (likely by January 29, 2016)

February 2016

- IRS Data Retrieval Tool, February 7, 2016

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**Training Feedback**

To ensure quality training we ask all participants to please fill out an online session evaluation

- Go to <http://s.zoomerang.com/s/DavidBartnicki>
- Evaluation form is specific to David Bartnicki
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional concerns about training can be directed to [joann.borel@ed.gov](mailto:joann.borel@ed.gov)

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**QUESTIONS?**



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