Resolving Eligibility Issues for
Citizens and Eligible Noncitizens

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Agenda

- Citizenship Requirement
- Database Matches
- Eligible Categories
  - U.S. Citizens or Nationals
  - Eligible Noncitizens
- Third Step Verification
- Systematic Alien Verification for Entitlements (SAVE) System

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Citizenship Requirement

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Citizenship Requirement

- U.S. Citizen or National
- U.S. Permanent Resident or other Eligible Noncitizen
- Citizen of the Freely Associated States

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Completing the FAFSA®

Q14: Are you a U.S. citizen? Mark Only One.
- Yes I am a U.S. citizen (U.S. national)
- No, but I am an eligible noncitizen
- No, I am not a citizen or eligible noncitizen

Q15: Alien Registration Number
- A_ _ _ _ _ _ _ _ _

14. Are you a U.S. citizen? Mark only one. See Notes page 9.	Yes, I am a U.S. citizen (U.S. national). **Skip to question 16.** ...... ○ 1	15. Alien Registration Number
	No, but I am an eligible noncitizen. **Fill in question 15.** .... ○ 2	A _ _ _ _ _ _ _ _
	No, I am not a citizen or eligible noncitizen. **Skip to question 16.** ○ 3	

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Database Matches

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Database Matches

All FAFSAs are matched with the Social Security Administration (SSA)
for U.S. Citizenship status.

FAFSAs that have an Alien Registration Number (ARN) are matched
against Department of Homeland Security (DHS) records.

If the DHS match fails after automated primary and secondary
verification, the school must conduct a third step verification.

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SSA Database Match

- Successful match
- Data does not match *(C-code)*
  - Student should correct the SSN, name, or date of birth and resubmit
- U.S. Citizenship not confirmed *(C-code, comment 146)*
  - If not a citizen, student must make corrections to FAFSA and indicate
    appropriate response in Q14
  - If eligible noncitizen answer Q15
  - If student is a citizen, the student must provide documentation of his
    or her status

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U.S. Citizenship Documentation

The Department doesn't specify all of the acceptable documents, but here
are some documents that prove U.S. Citizenship:

- Copy of birth certificate showing student was born in the United States or
  its territories
- U.S. passport (book or card)
- Consular Report of Birth Abroad
- Certificate of Citizenship
- Certificate of Naturalization

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DHS Database Match

- Successful match
  - 01 transaction shows: DHS Flag = Y and the Secondary DHS Flag = N (code 143)
  - 01 transaction shows: DHS Flag = N and the Secondary DHS Flag = Y
- Record not sent
  - 01 transaction shows: DHS Flag = Blank and the Secondary DHS Flag = N
    - Blank citizenship question (code 068)
    - Change to either citizenship question or ARN
    - Missing, illegible, or invalid ARN (code 142)

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DHS Database Match

- Not Yet Confirmed
  - 01 transaction shows DHS Flag = N and the Secondary DHS Flag = C (In continuance)
  - The school is advised to wait up to 15 days while DHS continues to attempt confirmation
    - If a match is found, CPS system automatically generates ISIR trans 02 (with the same DHS V#) which shows a Secondary DHS Flag of Y
    - If no match is found, an additional ISIR is not generated and the school may start third step verification

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Example: Match Result on ISIR

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Eligible Noncitizen Categories

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Eligible Noncitizen Categories

- Lawful Permanent Residents (LPRs)
- Conditional Resident Aliens
- Refugee
- Asylee
- Parolee – Expires or Indefinite
- Cuban-Haitian Entrants
- Conditional Entrants
- Victims of Human Trafficking
- Battered Immigrants-Qualified Aliens

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Lawful Permanent Residents (LPRs)

LPRs, noncitizens who are legally permitted to live and work in the U.S. permanently, may provide:

- Permanent Resident Card or Resident Alien Card-Form I-551/ "Green Card"
- Arrival/Departure Record-I-94 or I-94A
- Unexpired Foreign Passport-with machine readable immigrant visa
- U.S. Travel Document which contains the Reentry Permit
- I-797 Notice of Action indicating the student's status is approved

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Conditional Resident Aliens

Conditional resident aliens in possession of green cards valid for two years may provide:

- A valid I-551, I-94, I-94A, or a passport with a machine readable immigrant visa (MRIV) bearing the statement, "Upon endorsement serves as temporary I-551 evidencing permanent residence for 1 year."

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Refugee

Refugees, noncitizens that are of special humanitarian concern to the United States, may provide:
- Electronic I-94 showing "RE" as the class of admission and "DS" as the admit until date
- Refugee travel letter provided by the Department of State will be annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA)
- Paper I-94 or I-94A form annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA)
- They may also have the old Refugee Travel Document (Form I-571) or the newer U.S. Travel Document annotated with "Refugee Travel Document Form I-571 (Rev. 9-2-03)"

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Asylee

Asylees, noncitizens seeking protection in the United States due to persecution, may provide:

- An I-94 or I-94A with a stamp showing admission under Section 208 of the INA
- The same travel documents described for refugees

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Parolee

Parolees, individuals who may be inadmissible or otherwise ineligible for admission into the U.S., may be paroled into the U.S. for a temporary period. These individuals paroled into the U.S. for at least one year may provide:

- An I-94 with a stamp indicating that the student has been paroled into the U.S. for at least one year, with a date that has not expired, **and**

- Evidence from the DHS that they are in the U.S. for other than a temporary purpose and intend to become a citizen or permanent resident
  - I-797 stating that the student has applied for LPR status
  - Being the named alien relative from a petitioner [I-130]

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Cuban-Haitian Entrants (CHE)

Cuban and Haitian parolees and nationals who are in proceedings under the Immigration and Nationality Act (INA), or who have applications pending for Asylum status may provide:

- I-94 arrival/departure record with Cuban-Haitian Entrant stamp

All categories of Cuban-Haitian Entrants are eligible for Title IV aid.

Documents showing that the holder is a Cuban-Haitian entrant continue to document an eligible noncitizen status even if the expiration date has passed.

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Conditional Entrants

Conditional Entrants are refugees who entered the U.S. under the seventh preference category of P.L. 89-236, or whose status was adjusted to lawful permanent resident alien under that category. These applicants may provide:

- An I-94 with a stamp displaying "Section 203(a)(7)" and indicating that the person was admitted to the U.S. as a conditional entrant

- Note: DHS stopped using this category after enactment of the Refugee Act on March 31, 1980. You should not disburse FSA funds if the student has an I-94 with conditional entrant status granted after that date.

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Victims of Human Trafficking

Victims of human trafficking are individuals compelled to provide labor or services by force, fraud, or coercion. These applicants may provide:

- An I-94 with a T1, T2, T3, or T COA code for principal, spouse, child, or parent, respectively

Do not complete third step verification. Instead, review the student's certification or eligibility letter from Health and Human Services (HHS) and call the Office on Trafficking in Persons at 1-866-401-5510.

You must note the date, time, and results of the call and retain a copy of the letter in the student's file.

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Battered Immigrant-Qualified Aliens

Immigrants who are spouses of U.S. citizens or spouses of lawful permanent residents, and who are victims of domestic violence, as determined by the United States Customs and Immigration Service (USCIS), may be deemed "qualified aliens," under the Violence Against Women Act (VAWA) and may provide:

- I-797 form indicating:
  - Approved
  - Establishment of a "Prima Facie" case
  - Suspension of deportation
  - Cancellation of removal

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Battered Immigrant-Qualified Aliens (cont.)

Third step verification is not required. If school is still unclear, the FAA may request third step with special notation in the notes box: "VAWA Verification Requested."

If SAVE returns a result of "pending prima facie VAWA self-petition" this means that the applicant has established a prima facie case. Therefore the applicant is eligible until the I-797 expires.

- "Prima facie" cases are initial submissions that do not comply with all of the evidentiary burdens required for adjudication. In general, this case status allows the applicant additional time to provide documentation.

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Citizens of Freely Associated States

Federated States of Micronesia, Republics of Palau, and the Marshall Islands

- Eligible for limited FSA funds

Student must use ED-assigned pseudo-SSN in order to calculate Pell Grant lifetime eligibility used

Proof of residency in the Freely Associated States is required

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Ineligible Statuses

- Persons with nonimmigrant visas
- Family unity status
- Advanced Parole
- Temporary residents
- Illegal aliens under the legalization program (amnesty)
- Temporary protected status
- Deferred Action for Childhood Arrivals (DACA)
- Withholding of removal order
- U-visas

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Gaining Eligibility

A student is eligible for Federal Pell Grant, TEACH Grant, and Campus-Based aid retroactive to the beginning of the award year in which he or she becomes eligible by meeting the requirements for citizenship or eligible noncitizen status.

A student is eligible for Direct Loans retroactive to the beginning of the loan period during which the student gained eligibility.

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Documentation in Subsequent Award Years

Required if the student:
- Presented a Temporary Form 1-551
- Is in any of the following categories:
  - Conditional Permanent Resident
  - Asylee
  - Refugee
  - Cuban-Haitian Entrant

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Documentation in Subsequent Award Years

Not required if the student:
- Is a U.S. citizen or national, is a citizen of the Freely Associated States, has a Form I-551 or I-151, or
- The SAVE response showed that the student was an eligible noncitizen and the documents used for that third step verification have not expired

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Third Step Verification

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Third Step Verification

- The "Paper Secondary Confirmation" step, which required you to submit a paper form G-845, is now called "third step verification"

- If the student does not pass both the primary and secondary confirmations, or if you have conflicting information about the student's immigration status after receiving a match result, you must complete third step verification

- DHS-USCIS returns the response via the SAVE system

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Third Step Verification Preparation

- Request the student's most current, unexpired immigration document and make a copy of it

- Carefully review the student's immigration documentation against the status and document descriptions found in the _FSA Handbook, Volume 1, Chapter 2 – U.S. Citizenship and Eligible Noncitizens_

- Determine whether the student's immigration documentation supports eligibility for Title IV aid
  - If it does, proceed with third step verification
  - If it does not, you should not complete third step verification

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Systematic Alien Verification for Entitlements (SAVE) System

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Using the SAVE System

- To submit a record for third step verification request, access the SAVE system at:
  - https://save.uscis.gov/web/vislogin.apsx?JS=Yes

- Access DHS-SAVE Instructions for School Users at:
  - https://ifap.ed.gov/eannouncements/051018DHSSAVEInstUSDeptEDSchoolUsers.html

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SAVE System Use Agreement

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SAVE Login Screen

Enter your SAVE User ID and Password

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SAVE "Third Step Only User" Welcome Screen

Click on "Search Case"

SAVE Case Search

Enter the student's Verification number and Date of Birth from the student's ISIR

Note: "No cases found" error message will be shown later in this presentation

SAVE Summary List

Select the Verification Number
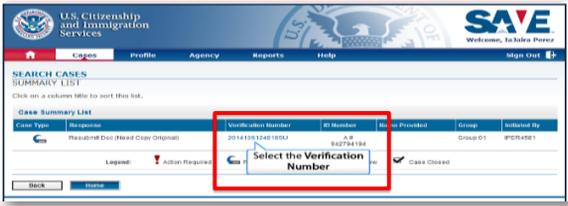
SAVE System Response Screens

Check the SAVE Response box for one of five responses:

1. "Resubmit Doc" - Case Status: "Closed"

2. "Resubmit Doc" - Case Status: "Returned"

3. "Applicant Status:" "Application-Pending," "Parolee- Expires," "Parolee-Indefinite," "Non-Immigrant," or "Other," with "Still not sure?…" link

4. "Case in review"

5. "Applicant Status: [status]" or "Applicant is a [status]" final response (no link)

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SAVE System – Response #1

1. "Resubmit Doc" – Case Status Case Closed
   Scroll to top of screen, if the Case Status is "Case Closed," request a new DHS verification number (DHS V#)
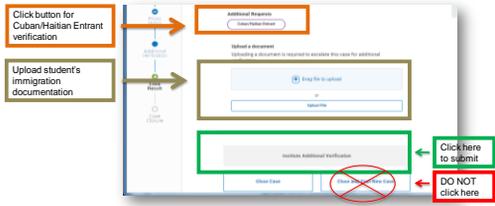

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SAVE System – Response #2

2. "Resubmit Doc" – "Case Status: Case Returned"

Request VAWA & other special verification review in Special Comments box

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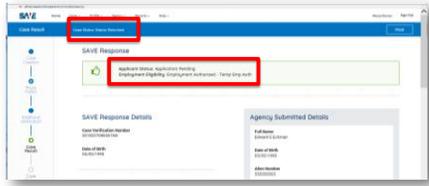Federal **Student Aid** PROUD SPONSOR of the AMERICAN MIND®
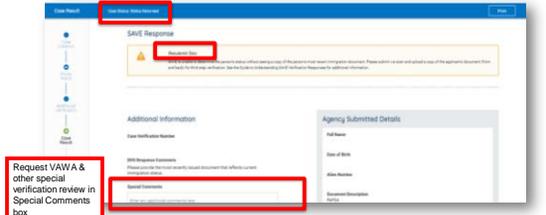
SAVE System – Response #2 (cont.)

2. "Resubmit Doc" – "Case Status: Case Returned"

SAVE System – Response #3

3. "Applicant Status": "Application-Pending", "Parolee- Expires", "Parolee-Indefinite", "Non-Immigrant", or "Other"

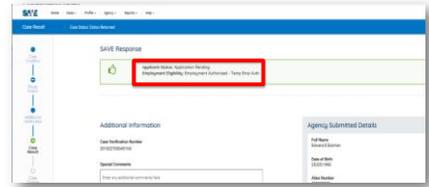## SAVE System – Response #3 (cont.)

• Click on "Still not sure? Institute Additional Verification" link to go to page 2
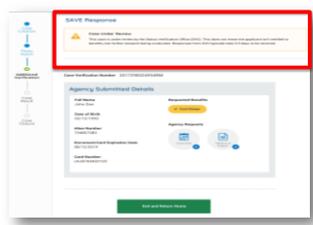
SAVE System – Response #3 (cont.)

- Follow "Resubmit Doc" – Case Status "Returned" instructions to submit third step verification

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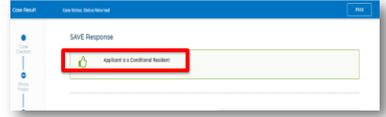
SAVE System – Response #4

4. Case Under Review

If a case is submitted, this screen appears for 3 to 5 business days (usual time frame), or until it is updated with an "Applicant Status"

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SAVE System – Response #5

5. "Applicant Status: [status]" or "Applicant is a [status]" final response (no link)

- This is the result of your verification request
- Green "thumbs up" does not indicate the student is eligible for Title IV aid
- Can you use this SAVE Response to process the student's Title IV aid? (See next slide)

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SAVE System – Response #5 (cont.)

Compare student's immigration document with SAVE Response:

- If they match, and support an eligible noncitizen status, use this SAVE response to continue processing the student's record

- If they match, but do not support an eligible noncitizen status, the student is not eligible for Title IV aid. Stop third step verification

- If the document supports an eligible noncitizen status (*e.g.* LPR), but the SAVE response shows an ineligible status (*e.g.* "Application Pending I-485"), request new DHS Verification number to resubmit the verification

Note: Case Status can be "returned" or "closed" in all options

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SAVE System Responses

- Wait 3-5 business days after submitting a third step verification request
- Login to SAVE: https://save.uscis.gov/web/vislogin.aspx?JS=YES
  - Accept the User Access Agreement Statement
  - Sign in with your SAVE user ID and password
  - On the Home screen, click on "Search Case"
  - On the Case Search screen, enter the student's DHS V# and DOB
  - On the Search Cases Summary List screen click on the DHS V#
- The SAVE Response will always be #5. "Applicant Status: [status]" or "Applicant is a [status]" final response (no link)

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SAVE System – No Cases Found Error Message

1. Reenter the DHS verification number with capitalized alpha characters and DOB with leading zeros ("01" not "1")
2. Check if FAA Access DOB matches immigration doc DOB; if not, re-enter record with DOB from immigration documentation
   - (If successful, student can fix discrepancy later)
3. In FAA Access, check the "DHS Sec. Conf. Flag" on the most recent ISIR transaction:
   - If "Noncitizen Status Confirmed," (comment 120), use this transaction, stop 3ʳᵈ step verification.
   - If "Could not confirm noncitizen eligibility" (comments 046 or 109) or "In Continuance," (comment 105), send an email to applicationprocessingdivision@ed.gov with "No Cases Found" in the Subject line. APD will research and respond ASAP

One or more fields are in error. Please make the following corrections:

- No cases found that match the search criteria.

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SAVE System – Requesting New DHS V#

Only submit a request if:

- SAVE Response is #1 "Resubmit doc," "Case Status: Case Closed," or

- SAVE Response is #5 "Applicant Status: [status]" or "Applicant is a [status]" final response (no link) but the student's immigration document does not support that status

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SAVE System – Requesting New DHS V# (cont.)

1. The FAA must make correction in _FAA Access_ by blanking out and re-entering the student's name, DOB, or Alien Registration Number
   - The record is sent to DHS-SAVE
   - A new ISIR will be generated with a 50% chance of a new DHS V#

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SAVE System – Requesting New DHS V# (cont.)

2. After 3-5 business days, download the last transaction and "Compare" the last 2 transactions
   - In Match Flags section of the latest ISIR, check "DHS Match Flag" & "DHS Sec. Conf. Flag" fields
     - If "Citizenship confirmed," process the student's aid, stop third step verification
     - If "Confirmation in continuance," wait 10 business days for CPS system-generated ISIR before proceeding to next bullet
     - If "DHS could not confirm noncitizen eligibility status," has the DHS V# changed?
       - If yes, enter it and the student's DOB into SAVE to submit third step verification
       - If no, send email to applicationprocessingdivision@ed.gov with DHS V# in the subject line.

3. Application Processing Division will resend the record to DHS-SAVE to create a new DHS V#

4. After 3-5 business days follow the instructions beginning with #2

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SAVE System – Future Enhancements

The DHS SAVE Instructions for School Users document was updated in December 2018 (see Electronic Announcement, December 6) to include:
- New Response screens
- Relevant EA information
- When and how to request a new DHS V#

SAVE also began sending an automated email to the user when a response is available in SAVE

FAAs will receive "Resend to Matches" button in February 2019
- Fewer steps
- Faster end result
- The resulting ISIR will always contain a new DHS V#

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SAVE System – Resources

Federal Student Aid Handbook: Volume 1, Chapter 2: U.S. Citizenship and Eligible Noncitizens

DHS-SAVE Instructions for School Users

DHS-SAVE, Eligible Noncitizen IFAP Information Page

Applicationprocessingdivision@ed.gov, 202-377- 4600

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Thank You

Follow-up questions? Contact:
AskaFed@ed.gov

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