



Annual Conference
May 24-27, 2016
Bonita Springs, FL

2016 FASFAA Annual Conference
Hyatt Regency Coconut Resort and Spa
Bonita Springs, FL
May 24-27





Resolving Citizenship, Selective Services and Veteran Status C-Flags

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2016 FASFAA Annual Conference
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Agenda:

- Citizens vs Non-Citizens – Database Match
 - Policy and Procedure
 - Acceptable documentation – processing tips
- Veteran Status – Database Match
 - Policy and Procedure
 - Acceptable documentation – processing tips
- Selective Services – Database Match
 - Policy and Procedure
 - Acceptable documentation – processing tips
- Questions???

Citizens/Non-Citizen Database Match

- CPS Database Matches conducted when FAFSA is processed – resolution required if match fails:
- These ISIR's are identified with a C-Code commonly referred to as “C-Flag”
- Determination of eligibility is required prior to disbursement of aid
 - Non-citizens: Department of Homeland Security (DHS)
 - Primary confirmation and if necessary secondary automated confirmation conducted and a new ISIR/SAR generated within 3 business days
 - Schools should wait at least 5 but no more than 15 business days for the result of automated secondary confirmation before beginning the paper process
 - Citizens: Social Security Administration

Citizens/Non-Citizen Database Match

Comments that generate the C Flag are arranged by the areas that the comments are associated with:

- Selective Service Match: 30, 33, and 57
- DHS Match: 46, 105, 109, 141, 142, and 144
- Social Security Administration Citizenship Status: 146
- Veterans Affairs Status Match: 162, 173, and 180

<http://ifap.ed.gov/sarcommcodetxt/attachments/1516SARCommCodesTxt.pdf>

Citizens/Non-Citizen Database Match

If an applicant fails the citizen/non-citizen database match, the school's notification to the student must include:

- Information on documentation required to support student's eligibility status
- Deadline for submitting documentation
- Statement that Title IV eligibility will not be determined until documentation is provided

Citizens/Non-Citizen Database Match

Documentation:

- You must always examine and copy original immigration documents (**except...see next slide**)
- You must keep a copy in the student's file with the secondary confirmation results from the USCIS
- While generally not permitted, you may legally photocopy immigration documents (such as Forms I-551 or I-94) when a person needs to prove his immigration status for a lawful purpose such as applying for federal student aid (copy both sides, when possible).
- **E-Announcement Mar 9, 2015** When you add or change a student's ARN, do not complete a G-845; wait for a revised ISIR. If a student doesn't provide evidence that they are an eligible noncitizen, DO NOT complete a G-845 form for that student, unless you have conflicting documentation.

Citizens/Non-Citizen Database Match

Documentation when unable to appear in person: Dear Colleague Letter, GEN-15-08

- Verification of U.S. citizenship or immigration status when student is unable to appear at institution
- Confirmation of eligible noncitizen status
- Confirmation of U.S. citizenship
- Accepting photocopies or other images
- Additional steps

Citizens/Non-Citizen Database Match

CERTIFICATION OF TRUE, EXACT, AND COMPLETE COPY OF THE ORIGINAL DOCUMENTS

This form is for the collection of DHS or other U.S. citizenship/nationality documents from students unable to present their documents in person.

I certify that I, _____, am the individual
(Print student's full name)
signing this statement, and I am providing a copy of my documents along with a copy of a valid government-issued photo identification card bearing my portrait (or likeness).

I certify that the attached documents and government issued photo identification are the true, exact, and complete copies of the originals issued to me.

List of document(s):

<u>NAME OF VALID PHOTO ID</u>	<u>EXPIRATION DATE OF VALID PHOTO ID</u>	<u>ISSUING AUTHORITY OF VALID PHOTO ID</u>

<u>NAME OF CITIZENSHIP AND/OR IMMIGRATION DOCUMENT (S)</u>	<u>EXPIRATION DATE (IF ANY) OF CITIZENSHIP AND/OR IMMIGRATION DOCUMENT (S)</u>

SAMPLE AFFIDAVIT

Page 2

I understand that providing false or misleading information or documents is punishable by fine or imprisonment and may make me liable for repayment of any funds received on the basis of the information and documents I have provided.

Student's Signature

Student's ID Number

Date

*Sign in the presence of a notary public

SAMPLE AFFIDAVIT



Citizens - Eligible Categories :

- U.S. Citizen
 - United States citizen by birth, naturalization, or by operation of law
 - Persons born in Puerto Rico, U.S. Virgin Islands, Guam, and the Northern Mariana Islands
 - Most persons born abroad to a parent who is a citizen
- U.S. National
 - Persons born on American Samoa, Swains Island, or United States Minor Outlying Islands

Citizens: Acceptable Documents

- United States Passport, current or expired
- Passport card



Citizens: Acceptable Documents

- Student's Birth Certificate
- Form FS-240 (Consular Report of Birth Abroad)



Citizens: Acceptable Documents

- Certificate of Citizenship (N-560 or N-561)



Citizens: Acceptable Documents

- Certificate of Naturalization (N-550)

THE UNITED STATES OF AMERICA

CERTIFICATE OF NATURALIZATION

No. **S0000000**

USCIS Registration No. **A9999999999999999**

Personal description of holder as of date of naturalization:
Date of birth: **JANUARY 99, 0000**
Sex: **MALE**
Height: **5 feet 9 inches**
Marital status: **MARRIED**
Country of former nationality:
FORMER NATIONALITY COUNTRY

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.
New Citizen Signature Here
(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security
 at: **USCIS FIELD OFFICE CITY NAME, STATE NAME**

The Secretary having found that:
NEW CITIZEN NAME – EPSON B-510DN – NEW ASC PHOTO
 residing at:
Mytown, State
 having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by
U.S. CITIZENSHIP AND IMMIGRATION SERVICES
 at: **CEREMONY CITY, STATE** on: **JULY 99, 0000**

such person is admitted as a citizen of the United States of America.

**** TEST CERTIFICATE ****
U. S. Citizenship and Immigration Services

DEPARTMENT OF HOMELAND SECURITY

Non-Citizens: Eligible Categories

- Lawful Permanent Resident
 - Referred to as “Permanent Resident Card” (Form I-551 since 1997)
 - Referred to as “Resident Alien Card” (Form I-551 before 1997)
 - Alien Registration Receipt Card (Form I-151 issued prior to June 1978)
 - “Green Cards”



Non-Citizens: Eligible Categories

- Lawful Permanent Resident Cont.
 - Arrival/Departure Record (CBP Form I-94)
 - “Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence. Valid until _____.”
 - Will have ARN annotated, and only acceptable if expiration date has not passed
 - Typically stapled to passport, look at front and back of document
 - An extension or change of status to an I-94 form is shown on a I-797A Approval Notice. The lower portion replaces the original I-94 and does not require any endorsed stamp



Departure Number: **626633123 12**

OMB No. 1651-0111

I-94 Departure Record

14. Family Name: **S,A,M,P,L,E**

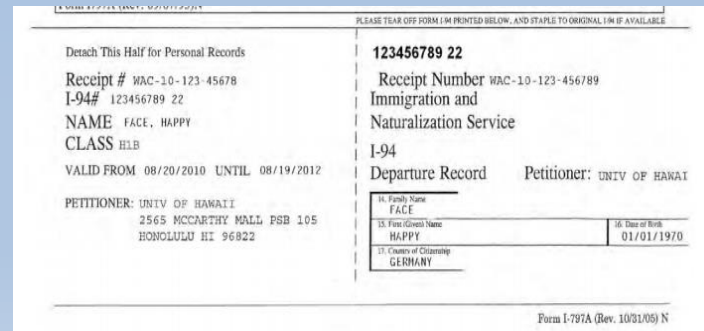
15. First (Given) Name: **J,A,N,E**

16. Birth Date (Day/Mo/Yr): **2,3,0,3,6,8**

17. Country of Citizenship: **N,E,W,Z,E,A,L,A,N,D**

Stamp: ADMITTED ATL JUN 25 2006 L-1 April 23, 2009

CBP Form I-94 (10/04) STAPLE HERE



PLEASE TEAR OFF FORM (IN PRINTED BELOW, AND STAPLE TO ORIGINAL I-94 IF AVAILABLE)

Detach This Half for Personal Records

123456789 22

Receipt # WAC-10-123-45678

Receipt Number WAC-10-123-456789

I-94# 123456789 22

Immigration and Naturalization Service

NAME FACE, HAPPY

CLASS H1B

I-94 Departure Record

VALID FROM 08/20/2010 UNTIL 08/19/2012

Petitioner: UNIV OF HAWAII

14. Family Name: FACE

15. First (Given) Name: HAPPY

16. Date of Birth: 01/01/1970

17. Country of Citizenship: GERMANY

PETITIONER: UNIV OF HAWAII
2565 MCCARTHY MALL PSB 105
HONOLULU HI 96822

Form I-797A (Rev. 10/01/09) N

Non-Citizens: Eligible Categories

- Lawful Permanent Resident Cont.
 - Machine Readable Immigrant Visa
 - Will be in the holder's passport
 - Valid for 1 year and cannot be expired



Non-Citizens: Eligible Categories

- Refugees
 - May have I-94 or I-94A annotated with a stamp showing admission under section 207 of the Immigration and Nationality Act (INA)
 - May also have the old Refugee Travel Document (Form I-571) or newer U.S. Travel Document annotated with “Refugee Travel Document Form I-571 (Rev. 9-2-03)
- Persons granted Asylum
 - Asylee status continues unless revoked by DHS or until permanent resident status is granted
 - I-94 or I-94A with a stamp showing admission under Section 208 of the INA or similar travel documents as described for refugees.

Non-Citizens: Eligible Categories

- Persons Paroled into the U.S. for at least one year
 - Stamped documentation indicating the student has been paroled into the United States for at least 1 year , with a date that has not expired
- Cuban-Haitian Entrants
 - I-94 may not be issued to students who are not refugees, asylees, or parolees. Instead, may have their status confirmed by a Customs and Border Patrol stamp, showing class of admission and date admitted.
 - Valid even if the document showing the holder is a Cuban-Haitian entrant has expired



Non-Citizens: Eligible Categories

- Conditional Entrants
 - Prior to 3/31/1980: I-94 with stamp displaying “Section 203(a)(7) and indicating admitted as a conditional entrant
 - DHS stopped using this after 3/31/1980. Do not disburse funds if student has I-94 with conditional entrant status granted later than this date.
- Victims of Human Trafficking
 - Department of Health and Human Services (HHS) certifies status not DHS (student will not pass the DHS match)
 - Review student’s certification/eligibility letter and contact the Office of Refugee Resettlement to verify it’s validity and confirm eligibility has not expired
 - 1-866-401-5510
- Battered Immigrants-Qualified Aliens
 - Victims of domestic violence by their U.S. citizen or lawful permanent resident spouses
 - USCIS will provide them with Form I-797 Notice of Action that indicates that it has been approved

Non-Citizens: Ineligible Categories

- Nonimmigrant visas
- Family Unity Status
- Temporary residents
- Illegal aliens under the amnesty program
- “Temporary Protected Status”
- Deferred Action for Childhood Arrivals (DACA)
- “Withholding of Removal” Order
- “U-Visa” holders

Citizens: Processing Tips

1. *Service Standard: 5 days from date document comes in*
2. *Notification:*
 - *As soon as documentation is required*
 - *Approved Citizenship documents: instruct students to contact SSA*

This concerns your 16-17 (Fa 16, Spr 17, Sumr 17) application for financial aid.

You have provided us with documentation verifying your status as a United States citizen or eligible non-citizen; however, your Student Aid Report (SAR) indicates that the Social Security Administration (SSA) could not confirm your status.

Please contact your local SSA office and have them update their records.

If you have changed your name (due to marriage, divorced, etc.), you need to apply for a new Social Security Card. Updating your records with the SSA office will speed up the processing of your financial aid application in the future.

Thank you for your cooperation in this matter.

Non-Citizens: Processing Tips



- G845:

If the student didn't pass automated secondary confirmation or if you have conflicting information about their immigration status after receiving a match result, you must use paper secondary confirmation.

- The student must give you unexpired documentation that shows they are an eligible noncitizen. If you determine the evidence is not convincing, the student isn't eligible for FSA funds, and you don't have to complete and send a G-845.
- If the documentation appears to demonstrate that they are an eligible noncitizen, you must submit it to the USCIS (in the DHS) to confirm it is valid. One exception to this applies to victims of human trafficking, as noted earlier.

Non-Citizens: Processing Tips

- G845:
- USCIS has released a new version of the G-845. You need to use the new form for secondary confirmation

USCIS

Form G-845

OMB No. 1615-0101

Expires: 05/31/2018

- Submit the G-845 to the USCIS field office (Los Angeles or Buffalo) that serves your state or territory. See their website at www.uscis.gov. Search on “Direct Filing Addresses for Form G-845.” **Do not send the form to the Department of Education.**

Non-Citizens: Processing Tips

- G845:
 - A status verifier at the district USCIS office will search the student’s record to confirm the immigration status, complete the “USCIS Response” section, and send the G-845 back to your office, generally within 21 federal working days of receipt
 - If you haven’t heard back about the G-845 within 15 days, then you can call DHS’s Case Resolution Team at 1-(877)-469-2563 to make sure the G-845 was received
 - Do not send a duplicate G-845 unless the Case Resolution Team asks you to do so.
 - If you don’t receive a response from the USCIS after at least 15 business days from the date you sent the G-845, if you have sufficient documentation you may make a determination
 - Note in the student file that USCIS exceeded the time allotment and that noncitizen eligibility was determined without their verification

Subsequent Years:

- If a school has already documented that the student is a U.S. citizen, U. S. national, a citizen of one of the Freely Associated States, or has a permanent I-551 or I-151, then the student is not required to resubmit documentation in subsequent award years.
- Furthermore, a school is not required to conduct secondary confirmation for a lawful permanent resident in a subsequent award year if the USCIS confirmed the student's eligible non-citizenship status when secondary confirmation was conducted in a previous year and the documents used to confirm the student's status **have not expired**.

Veteran Status Database Match

Veteran Status Database Match

- A student may fail the match conducted with the Department of Veterans Affairs but may still be considered a veteran for financial aid purposes
- Independent student only because of veteran status
- If student fails the match, DD214 is the documentation required to verify eligibility as a veteran for financial aid purposes (Member – 4 form has all information needed)

Exception: Student may instead provide documentation to the school that shows upcoming release orders from a military branch, typically in memorandum format or letter, stating intent to release. **There is no requirement to reconfirm actual separation during the award year.**

Veteran Status Database Match

A Veteran is:

- A former member of the Army, Navy, Air force, Marines or Coast Guard who served on active duty (including basic training) and was discharged with status of other than dishonorable. *Note: at least one day of service required – including active duty training.*
- A former member of a US military academy or it's Preparatory School for at least one day and who was released under conditions other than dishonorable.
- Members of the National Guard or Reserves ONLY if they were called to active federal duty by “presidential order”. The character of service must also be other than dishonorable.
- A member of a regular unit who will be discharged prior to June 30th of 2016, and has provided a statement of service stating that information. (15-16 aid year)



Veteran Status Database Match

Not a Veteran:

- Students currently attending a US Military Academy and ROTC students.
- Members of the National Guard or Reserves who never served on active duty other than during initial training (“AIDT” active initial duty training).
- Members of the National Guard or Reserves who received specialized active duty training in the military (these periods are not considered active duty). It has to be active duty other than for the purpose of training.
- Members of the National Guard or Reserves who were a cadet or midshipman at one time would not be considered as having active duty (this is considered a period of training).
- Members of the Armed Forces that received a “dishonorable” discharge.



Veteran Status Database Match

Reviewing the DD214:

- BOX 2:
 - Regular unit = USMC, USA, USN, USCG, USAF, ARMY/RA
 - Reserves or National Guard = any of above with “R” or “NG” following (Ex. USAFR)

If it says USMC, USA, USN, USCG, USAF, these categories are regular units. If any of these abbreviations are followed by “R” or “NG” then these would be Reserves or National Guard. Look at box 18 for details.

THIS IS AN IMPORTANT RECORD SAFEGUARD IT ANY ALTERATIONS IN SHADED AREAS RENDER FORM VOID

DATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY

2 DEPARTMENT, COMPONENT AND BRANCH NAVY - USN	3 SOCIAL SECURITY NUMBER
4 DATE OF BIRTH (YYYYMMDD)	5 RESERVE OBLIGATION TERMINATION DATE

Veteran Status Database Match

Reviewing the DD214:

- BOX 18:
 - Remarks section = notes regarding service, active duty information, etc. Also, if called to presidential order, you’ll likely see “Operation _____” in the text of this section.

PAID 50

DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION

18 REMARKS

30646-09-2599-BLM

In this section you may find notes relating to service, active duty information, completion of active duty, etc. If National Guard OR Reserves should show called to congressional or presidential order.

The information contained herein is subject to computer matching within the Department of Defense or with any other affected Federal or non-Federal agency for verification purposes and to determine eligibility for, and/or continued compliance with, the requirements of a Federal benefit program.

Veteran Status Database Match

Reviewing the DD214:

- BOX 23:
 - Type of separation, may say “discharged” or “released from active duty”
- BOX 24:
 - Will say “honorable”, “uncharacterized” or “dishonorable” (anything other than “dishonorable” is acceptable)
- BOX 28:
 - Separation reason. This may help determine if service was for training or active duty.

Veteran Status Database Match

- If the match results **are incorrect** and the student **is a qualifying veteran**:
 - The student is eligible for Title IV aid as an independent student

 - If the match results **are correct** and the student **is not a qualifying veteran**:
 - The student must submit a correction to change the answer to Item 56 from “Yes” to “No”
- and**
- Provide parental information, including the signature of at least one parent on the FAFSA

Selective Services Database Match

Selective Services Database Match

SELECTIVE SERVICES – match conducted with Selective Services

Men 18-25 required to be registered, **except:**

- *Males **currently** in armed Forces and on active duty, active duty doesn't constitute "active duty for training"
- *Cadets and Midshipmen at Service Academies or Coast Guard Academy
- *Students in Officer Procurement Programs at the Citadel, North Georgia College and State University, Norwich University, Virginia Military Institute, Texas A&M University, Virginia Polytechnic Institute and State University
- Citizens of Republic of Palau, Marshall Islands & Federated States of Micronesia
- Males born before 1960
- Non citizens who first entered the country after age 26
- Non citizens who entered as a non immigrant and remain in that status until after 26
- Individuals who are born female and changed their gender to male
- Continually confined to a residence, hospital, or institution for the entire period of 18-26 years old

*must register if released from duty before age 26

<https://www.sss.gov/Portals/0/PDFs/WhoMustRegisterChart.pdf>

Selective Services Database Match

SELECTIVE SERVICES

- Females are not required to register but may be flagged if they leave that blank on the FAFSA or they mistakenly report the gender as male
- If the student **isn't** required to register, you must document the student's status
- If the student is **exempt from** registration, you must also document the student's status
- If a male immigrant can show proof that he first entered the U.S. when he was past registration age, he is clearly ***not required to be registered, and no Status Information Letter is needed***. The student's entry documentation is enough to show whether he was required to register

Selective Services Database Match

Document Review:

Student may submit any or in some cases a combination of the following:

- A copy of the Selective Service Registration Card
- A “Status Information Letter”, from the Selective Service
- A printout of the registration from the Selective Service website (www.sss.gov)
- A copy of Drivers license – females or born prior to 1960
- DD214 or military ID
- Supporting documentation – proof that lack of registration was not willful

*A student who should have registered but didn't, **MUST** provide a Status Information Letter, even if other supporting documents are submitted – except those exempted*

RESOURCES

- *Federal Student Aid Handbook*, Volume 1, Chapter 2
- SAR Comment Codes and Text & ISIR Guide
- GEN-06-09 (T-visa); GEN-10-07 (VAWA)
- 34 CFR 668.32(d); 668.33; subpart I of Part 668
- USCIS website – www.uscis.gov
- Selective Services website – www.ss.gov



RESOURCES

Ordering Information

This guide has been prepared by the ICE Forensic Document Laboratory (FDL) and may not be sold. To order additional copies of "A Guide to Selected U.S. Travel and Identity Documents" (Form M-396), please contact the CBP National Distribution Center at:

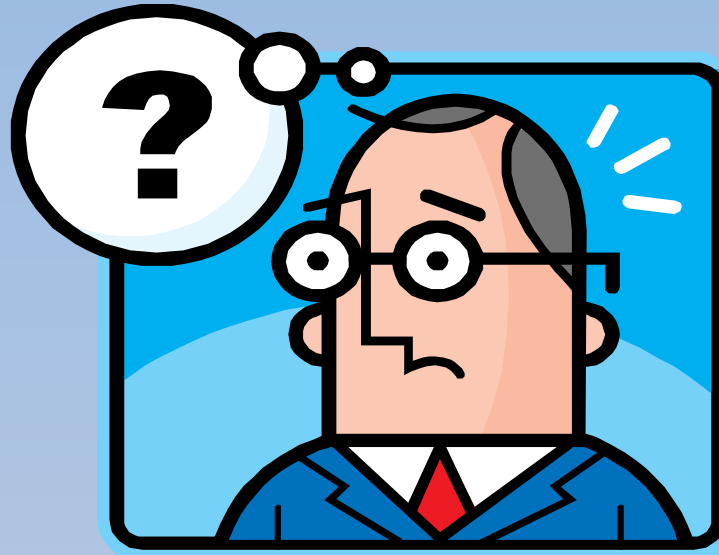
CBP National Distribution Center
P.O. Box 68912
Indianapolis, IN 46268

Fax: 317-290-3046.

For government requests, please use CBP Form 3039. All other requests should use Form CBP Form 262.

Links for these forms are located at the bottom of the FDL page on ICE's public website at www.ice.gov/forensic-document-lab.

QUESTIONS





Contact Information:

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THANK YOU



SAVE THE DATE!
FASFAA 2017
May 30 – June 2 2017

Hyatt Regency Grand Cypress, Orlando, Fl.

