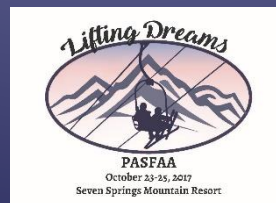


Substantiate, Validate, & Authenticate

Cathy Demchak & Lynn Javor

Carnegie Mellon University

PASFAA Conference, October 2017



Agenda

- What is a comment code? How does it happen?
- Which codes relate to citizenship status?
- What do I need to resolve them?
- What is acceptable documentation?
- Resources



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October 23-25, 2017
Seven Springs Mountain Resort

What is a comment code?

- The Central Processing System (CPS) adds comment codes and text on the Student Aid Report (SAR) and the Institutional Student Information Report (ISIR) to provide information to the student and the financial aid administrator about the student's processed Free Application for Federal Student Aid (FAFSA®).
- The 2018-2019 ISIR Guide is designed to assist financial aid administrators with interpreting student information from ISIRs.

FAA Access to CPS Online – Student Inquiry

[NEED HELP?](#)

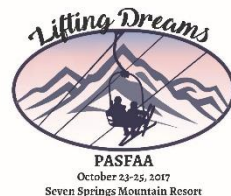
Processing Information

Processing Information	
Transaction Number:	01
Transaction Source:	Web Student
Transaction Type:	Application
Date Application Completed:	04/15/2017
Application Receipt Date:	04/15/2017
Processed Date:	04/17/2017
Signed By:	APPLICANT ONLY
EFC:	0 C ←

[NEED HELP?](#) [MAKE CORRECTIONS](#) [RETURN TO FAA MENU](#) [EXIT](#)

How do the codes originate?

- CPS coordinates data matches with other federal agencies, such as,
 - Social Security Administration (SSA)
 - Department of Homeland Security (DHS)
 - Selective Service System (SSS)
- In most cases, any mismatched data will produce a C Flag on the SAR and ISIR to alert the student and financial aid administrator of a potential problem.



FAFSA Questions

FAFSA[®]

FREE APPLICATION *for* FEDERAL STUDENT AID

July 1, 2017 – June 30, 2018

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of
the AMERICAN MIND[®]

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
No, but I am an eligible noncitizen. **Fill in question 15.** ☐ 2
No, I am not a citizen or eligible noncitizen. **Skip to question 16.** ☐ 3

15. Alien Registration Number

A									
---	--	--	--	--	--	--	--	--	--

21. Are you male or female?
See Notes page 9.

Male ☐ 1
Female ☐ 2

22. **If female, skip to question 23.** Most male students must register with the Selective Service System to receive federal aid. If you are male, age 18-25 and not registered, fill in the circle and we will register you. See Notes page 9.

Register me ☐ 1



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Which codes are related to a student's citizenship?

- Social Security Administration Citizenship Status: 146
- DHS Match: 46, 105, 109, 141, 142, and 144
- Selective Service Match: 30 and 33



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Social Security Administration Citizenship Status



- Comment Code 146
 - “The Social Security Administration did not confirm that you are a U.S. citizen.”*
- Resolution
 - Student should provide documents that definitively prove citizenship status.

*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



DHS Match



- Comment Code 46
 - “The United States Citizenship and Immigration Services (USCIS) of the Department of Homeland Security did not confirm that you are a noncitizen in an immigration status associated with the requirements of eligibility for the financial assistance for which you have applied.”*
- Resolution
 - Verify that the Alien Registration Number (ARN) in ISIR field 15 matches the ARN on the student’s eligible noncitizen document;
 - If ARNs match – begin paper (G-845) Third-Step Verification (previously Secondary Confirmation) Process.
 - If ARNs don’t match (or if field is blank) – correct ISIR field 15.

*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



DHS Match

- Comment Code 105
 - “The United States Citizenship and Immigration Services (USCIS) of the Department of Homeland Security has not yet confirmed that you are a noncitizen in an immigration status associated with the requirements of eligibility for the financial assistance for which you have applied.”*
- Resolution
 - Wait 10 business days for another system generated ISIR with updated Secondary Confirmation
 - If not confirmed, begin paper (G-845) Third-Step Verification Process.

*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



DHS Match

- Comment Code 109
 - “The United States Citizenship and Immigration Services (USCIS) of the Department of Homeland Security did not have enough information to confirm that you are a noncitizen in an immigration status associated with the requirements of eligibility for the financial assistance for which you have applied.”*
- Resolution
 - Verify that the Alien Registration Number (ARN) in ISIR field 15 matches the ARN on the student’s eligible noncitizen document;
 - If ARNs match – begin paper (G-845) Third-Step Verification (previously Secondary Confirmation) Process.
 - If ARNs don’t match (or if field is blank) – correct ISIR field 15.

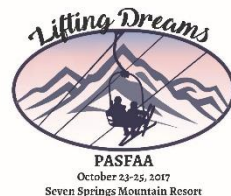
*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



DHS Match

- Comment Code 141
 - “You changed either your response to citizenship or the Alien Registration Number that was verified with the Department of Homeland Security.”*
- Resolution
 - Determine the reason for the change
 - Resolve any conflicting information
 - Student should provide documents that definitively prove citizenship status.

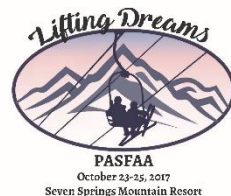
*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



DHS Match

- Comment Code 142
 - “The United States Citizenship and Immigration Services (USCIS) of the Department of Homeland Security could not confirm that you are a noncitizen in an immigration status associated with the requirements of eligibility for the financial assistance for which you have applied because there is an issue with your Alien Registration Number.”*
- Resolution
 - Add or correct ARN to the SAR/ISIR and resubmit for processing.
 - Review subsequent ISIR for an updated match status.

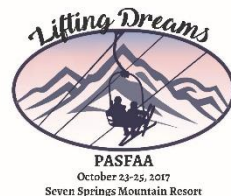
*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



DHS Match

- Comment Code 144
 - “The United States Citizenship and Immigration Service (USCIS) of the Department of Homeland Security (DHS) has not yet confirmed your status as a noncitizen in an immigration status associated with the requirements of eligibility for the financial assistance for which you have applied. DHS will continue to check its records...”*
- Resolution
 - Verify that the Alien Registration Number (ARN) in ISIR field 15 matches the ARN on the student’s eligible noncitizen document;
 - If ARNs match – wait 3 business days for a subsequent ISIR for an updated match status.
 - If ARNs don’t match – correct ISIR field 15 and wait for a subsequent ISIR with an updated DHS match flag.

*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



Selective Service Match



- Comment Code 30
 - “The Selective Service reported that you have not registered with them.”*
- Resolution
 - Student must register with Selective Service
 - Present appropriate confirmation of registration or qualify for a waiver or exemption**.
 - Eligible noncitizen student must present documentation that they first entered the U.S. after they turned 26.
 - Lawful nonimmigrant on a valid visa must present documentation that they remained in the U.S. on the terms of the visa until after turning 26.

*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education

**A letter from SSS is not required if documentation supports an exemption.



Selective Service Match

- Comment Code 33
 - “We could not send your name to Selective Service as you requested because you did not give us enough information...”*
- Resolution
 - If student is age 18 to 25, student can make corrections to SAR and submit.
 - Review subsequent ISIR for updated registration status.
 - If student is over age 25, student must obtain documentation from SSS regarding registration status.

*SAR Comment Codes and Text, 2018-2019, U.S. Department of Education



What are acceptable forms of documentation?

- U.S. Citizenship
 - Birth certificate showing that the student was born in the United States.
 - Birth certificate from a U.S. jurisdiction showing that the student was born abroad (Form FS-240, FS-545, or DS-1350).
 - Certificate of Citizenship issued by U.S. Citizenship & Immigration Services.
 - U.S. Passport, current or expired (except “limited” passports) or a wallet-sized passport card.
 - Certificate of Citizenship (N-560 or N-561)
 - Certificate of Naturalization (N550 or N570)



More information can be found in the 2017-2018 FSA Handbook, Volume 1, Chapter 2

What are acceptable forms of documentation?

- Lawful Permanent Residents (LPRs)
 - Permanent Resident Card (Form I-551 since 1997)
 - Permanent Alien Card (Form I-551 before 1997)
 - Arrival/Departure Card (CBP Form I-94)
 - Departure Record (Form I-94A) with the endorsement



More information can be found in the 2017-2018 FSA Handbook, Volume 1, Chapter 2

What are acceptable forms of documentation?



— MACHINE-READABLE ZONE

A machine-readable passport has two lines of text as letters, numbers and chevrons (<<<) at the bottom of the personal information page, along with your picture.

- Eligible Noncitizen (paper Third-Step Verification G-845)
 - A machine readable immigrant visa (MRIV) in the holder's passport with a U.S. CBP inspector admission stamp.
 - United States Travel Document (mint green cover), with the Reentry Permit (Form I-327) and the Refugee Travel Document (Form I-571).

More information can be found in the 2017-2018 FSA Handbook, Volume 1, Chapter 2

What are acceptable forms of documentation?

- Conditional Resident Aliens
 - valid (not expired) I-551, I-94, I-94A, or a passport with an MRIV bearing the statement, “Upon endorsement serves as temporary I-551 evidencing permanent residence for 1 year”
- Refugee
 - electronic I-94 showing “RE” as the class of admission and “DS” as the admit until date
 - paper form I-94 or I-94A annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA)

Departure Number 0000000000 00 OMB No. 1651-0111

I-94
Departure Record

Sample
APR 20 2011
Class F-1
Until D/S

14. Family Name
S T U D E N T

15. First (Given) Name
I M A

16. Birth Date (Day/Mo/Yr)
0 1 0 1 7 0

17. Country of Citizenship
A N Y C O U N T R Y

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



What are acceptable forms of documentation?

- Persons granted Asylum
 - An I-94 or I-94A with a stamp showing admission under Section 208 of the INA.
- Persons paroled into the U.S. for at least one year
 - 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.
 - Documentation of their parole status (such as an I-94) with a stamp indicating that the student has been paroled into the United States for at least one year, with a date that has not expired.

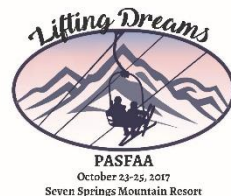


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What are acceptable forms of documentation?

- Cuban-Haitian Entrants (CHE)
 - Documentation of their CHE status.
- Conditional Entrants
 - An I-94 with a stamp displaying “Section 203(a)(7)” and indicating that the person was admitted to the United States as a conditional entrant dated before 03/31/1980.

More information can be found in the 2017-2018 FSA Handbook, Volume 1, Chapter 2



What are acceptable forms of documentation?

- Victims of Human Trafficking
 - An I-94 with a T₁, T₂, T₃, or T COA code for principal, spouse, child, or parent, respectively.
- Battered Immigrants-Qualified Aliens
 - Documentation based on their case type
 - Self-Petition – USCIS Form I-797
 - Suspension of Deportation – copy of the court order
 - Cancellation of Removal – copy of the court order

What are acceptable forms of documentation?

- Jay Treaty
 - A “band card” issued by the Band Council of a Canadian Reserve, or by the Department of Indian Affairs in Ottawa
 - Birth or baptism records
 - An affidavit from a tribal official or other person knowledgeable about the applicant’s or recipient’s family history



More information can be found in the 2017-2018 FSA Handbook, Volume 1, Chapter 2



Paper (G-845) Third-Step Verification Process



Verification Request
Department of Homeland Security
U.S. Citizenship and Immigration Services

**USCIS
Form G-845**
OMB No. 1615-0101
Expires: 05/31/2018

- Paper Secondary Confirmation is now called Third-Step Verification.
- USCIS's most recent version of the G-845 has an OMB Expiration date of 5/31/18. USCIS/SAVE will only accept paper G-845s until approximately April 30, 2018.

Resources

- [2018-2019 ISIR Guide](#)
- [SAR Comment Codes and Text, 2018-2019](#)
- [2017-2018 Federal Student Aid Handbook, Volume 1, Chapter 2](#)
- [USCIS G-845, Verification Request](#)
- [Selective Service System](#)

Questions?

