

VASFAA Conference 2017

Understanding ISIR Comment Codes and C Codes

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FAFSA Process

- ▶ Paper (Student)
- ▶ Web (Student)
- ▶ FAA Access to CPS Online (Financial Aid Administrator)



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Central Processing System (CPS)

- ▶ Coordinates data matches with other federal agencies:
 - Social Security
 - Homeland Security
 - NSLDS
 - Department of Defense
 - Selective Service
 - IRS
 - Department of Justice
 - Veterans Affairs



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Two Output Documents

- ▶ SAR – to students
- ▶ ISIR – to schools/institutions



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Comment Codes

The Central Processing System (CPS) adds comment codes and text to the student's transaction to provide information to the student and to the FAA about the student's processed FAFSA.



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Comment Codes

The Comment Code and Text document details each of the hundred comment codes that can be included on the ISIR.

- ▶ There are nearly 400 possible comment codes.
- ▶ Number of codes on any particular ISIR will vary widely.



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Comment Codes

Some Comment Codes do not necessarily require action:

- ▶ **Code 032:** The number you have reported for your parents' number of family members is significantly different than the number you reported on your FAFSA last year. Review Item 73 and make a correction if necessary.



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Comment Codes

Some Comment Codes require action by the applicant:

- ▶ **Code 024:** The Social Security Administration (SSA) did not confirm that the Social Security Number (SSN) you reported on your FAFSA is correct, and also could not confirm your U.S. citizenship. If you believe that the SSN you reported in Item 8 is correct, contact the SSA by calling 1-800-772-1213 or by visiting www.socialsecurity.gov. If the SSN is incorrect, you must correct the SSN on a paper SAR or submit a new FAFSA online with the correct SSN.



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Comment Codes

Some Comment Codes require action by both the FAA and the applicant.

- ▶ **Code 020:** To resolve your Pell overpayment, your Financial Aid Administrator must access NSLDS for additional Pell overpayment information.



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C Codes

Some Comment Codes include a C Code.

- ▶ C Codes usually result from problems with one or more of the data matches.
- ▶ C Codes function as an indicator that FAA resolution is required before aid can be disbursed to the student.



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C Code 399

Comment Code 399 (Cross year edit - EFC) is assigned when the student or parent reported different 2015 income and tax information on their 2017-2018 FAFSA than what was reported on their 2016-2017 FAFSA.

These edits and new comment codes will apply only for the 2017-2018 cycle and will be removed for the 2018-2019 cycle.



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Comment Code 399

Issues, discussion, and resolution



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Selective Service

Comment 30: Applicant not in Selective Service database

- ▶ Student must answer question, “Are you male or female” – if s/he does not, it is assumed s/he is male and the record will go through match with Selective Service – if no match – a C-Code is generated, regardless of gender
- ▶ Male students, ages 18 - 25 are required to register with Selective Service.
- ▶ Females are not required to register
- ▶ Any student who is born before 1960 is not required to register.



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Selective Service

You can satisfy the C-Code by:

- ▶ Verifying registration at www.sss.gov
- ▶ Obtaining a copy of the student's Selective Service Registration card
–
this happens in the cases of misspellings on registration.
- ▶ Receive a letter from Selective Service that student was not required to register.
- ▶ Proof of military service (copy of DD 214)



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Selective Service

Status Information Letter

- ▶ Need letter from Selective Service and the student's letter of explanation.
- ▶ Was the failure to register "knowing and willful"? You get to decide and your decision is final. It cannot be appealed.

Common Exemption to Selective Service Registration is entering the country after the age of 26. Documentation needs to include:

- ▶ Proof of birth date
- ▶ Proof of immigration date into the U.S from an entry date stamp on the I-94 form or in the passport, or a letter from the USCIS indicating the entry date.
- ▶ Or, proof that student was on a valid visa from entry until male turned 26.



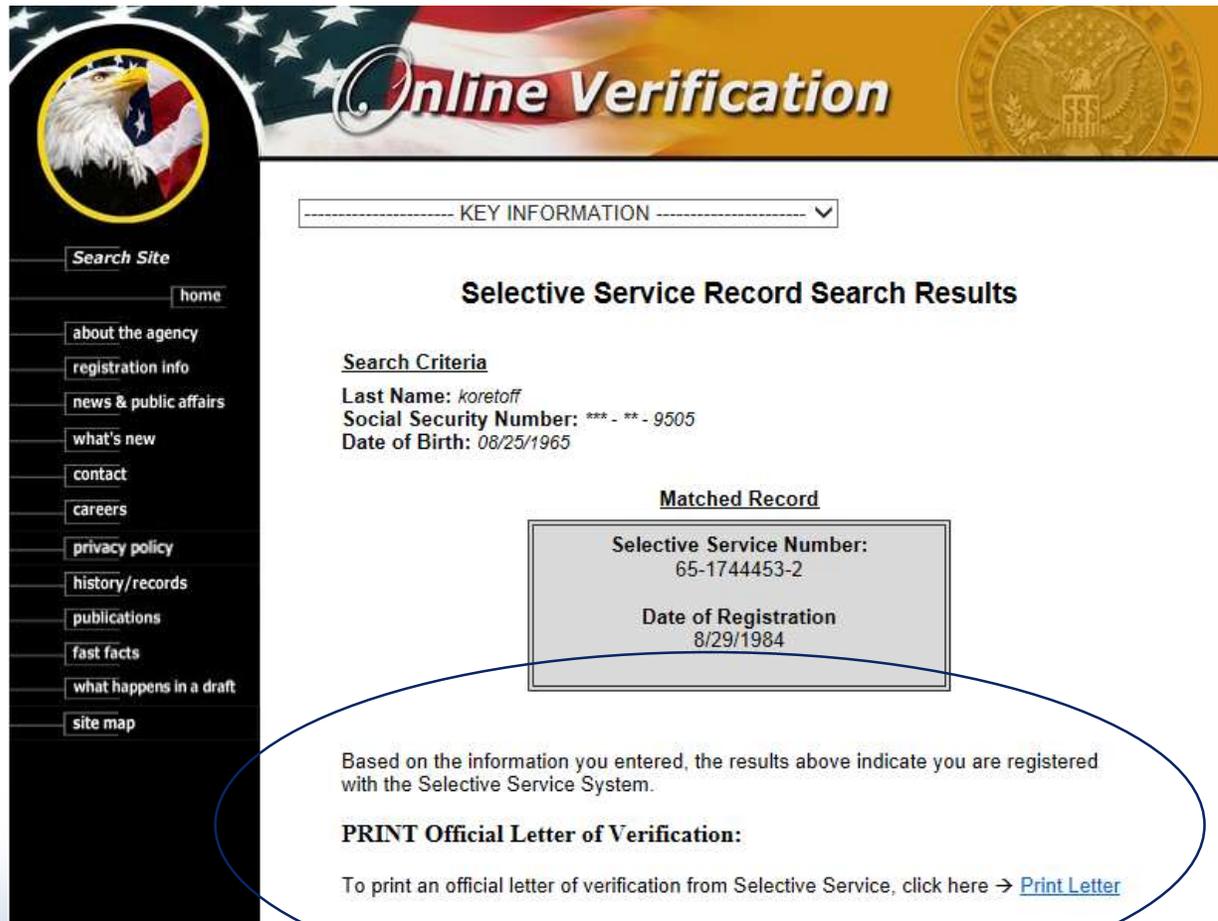
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Selective Service



Online Verification

KEY INFORMATION

Selective Service Record Search Results

Search Criteria
Last Name: *koretoff*
Social Security Number: *** - ** - 9505
Date of Birth: 08/25/1965

Matched Record

Selective Service Number: 65-1744453-2
Date of Registration 8/29/1984

Based on the information you entered, the results above indicate you are registered with the Selective Service System.

PRINT Official Letter of Verification:

To print an official letter of verification from Selective Service, click here → [Print Letter](#)

Search Site

- home
- about the agency
- registration info
- news & public affairs
- what's new
- contact
- careers
- privacy policy
- history/records
- publications
- fast facts
- what happens in a draft
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Selective Service Status Information Letter

Request for Status Information Letter

I am requesting a Status Information Letter. I am a male who is not registered with Selective Service. **I am now 26 years old or older**, and was born after December 31, 1959.

Section 1:

Name _____
First Middle Last

List any other names used _____
Include any multiple last names

Current Mailing Address _____
Street Address

City State Zip Code

Social Security Number _____

Any area Shi



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Social Security Administration

Comment 63 – Date of Birth (Item 9) inconsistent with SSA records

- ▶ If incorrect, submit date of birth correction to CPS
- ▶ If correct, student must contact SSA 1-800-772-1213 or www.socialsecurity.gov to update information.
- ▶ Supply FAA with proof of DOB (birth certificate, driver's license)



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Social Security Administration

Comment 64 – Name inconsistent with SSA records

- ▶ If incorrect, submit name correction to CPS
- ▶ Supply FAA with documentation explaining discrepancy
- ▶ Most often this is due to marriage – would need copy of marriage certificate
- ▶ Copy of court order if it was due to a legal name change not through marriage
- ▶ Sometimes it is caused because student transposed first and last name – FAA can correct this and send correction to CPS, which should fix the problem.



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Veterans' Affairs

Comment 162 and 173 – VA did not confirm Veteran status, so CPS assumes Dependent status

- ▶ If student believes this is an error – s/he needs to contact a regional VA office to have VA records updated.
- ▶ While student is resolving discrepancy with VA, FAA can collect documentation that student is a veteran of the U.S. Armed Forces (DD214).
- ▶ DD-214 must show “Character of Service” is other than “dishonorable.” Student must have been on active duty for purposes other than training.
- ▶ May have to process a dependency override to push record through as independent student.
- ▶ If student does not meet requirements, must update the Veteran question to “no” and provide parental information and signature.



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Veterans' Affairs

Comment 180 – Applicant is on active duty and CPS assumes Dependent status

- ▶ Student must 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.



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NSLDS

Comment Code Categories

- ▶ Potential Overpayments (133)
- ▶ Pell Codes: 020, 038, 039, 041, 042, 043, 346, 347
- ▶ FSEOG Codes: 010, 065, 066, 067, 077, 079
- ▶ Perkins Codes: 086, 090, 100, 101, 102, 107
- ▶ TEACH Codes: 289, 290, 291, 292, 293, 294
- ▶ Iraq/Afghanistan Codes: 309, 310, 311, 312, 313, 314
- ▶ Unusual Enrollment History: 359, 360



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NSLDS

Loan Codes

- ▶ Default: 124, 132, 134, 135, 136
- ▶ Discharge: 115
- ▶ Active Bankruptcy: 116
- ▶ Loan Limit Reviews: 254, 255, 256, 260



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NSLDS

Comment 133 – Applicant received overpayment of federal student aid funds and is required to repay the money

- ▶ FAA must contact the school associated with the overpayment.
- ▶ The FAA may have to access NSLDS for additional information.
- ▶ If held by Department of Education (ED), applicant must contact ED for guidance on how to resolve.



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NSLDS

Comment 346 – Applicant’s Pell Lifetime Eligibility Used (LEU) amount is close to the Pell limit (600%)

- ▶ Check NSLDS or COD for percentage used and adjust Pell, if necessary, to not exceed 600% LEU used.



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NSLDS

Comment 347 – Applicant’s Pell Lifetime Eligibility Used (LEU) amount is met or has exceeded the limit (600%)

- ▶ Check NSLDS or COD for percentage used and adjust Pell, if necessary, to not exceed 600% LEU used.



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NSLDS

Comment 359 Unusual Enrollment History (NSLDS UEH Flag = 2)

- ▶ The institution must review the student's enrollment and financial aid records to determine if, during the four award year review period (i.e. for 2015-16, review 2011-12, 2012-13, 2013-14, 2014-15), the student received a Pell Grant or Direct Loan at the institution that is performing the review.
- ▶ If yes, no additional action is required unless the institution has reason to believe that the student is one who remains enrolled just enough to collect student aid funds. In this case, the institution must follow the guidance that is provided for a UEH Flag=3.
- ▶ If not, the institution must follow the guidance provided for a UEH Flag=3



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NSLDS

Comment 360 Unusual Enrollment History (NSLDS UEH Flag = 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 (i.e. for 2015-16, review 2011-12, 2012-13, 2013-14, 2014-15). Using information from NSLDS, the institution must identify the institutions where the student received Pell Grant or DL funding over the past four award years.
- ▶ Based upon 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 DL funds.
- ▶ Academic credit is considered to have been earned if the academic records show the student completed any credit or clock hours.



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NSLDS Unusual Enrollment History

What if student didn't earn credit at previous schools?

- ▶ Treat like a SAP appeal or other professional judgment. Student needs to convince you by explanation and documentation that s/he has a valid reason for not earning credits at multiple schools.



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NSLDS

Comment 138 – SSN match, but name and DOB did not match

- Access NSLDS online to determine if NSLDS data is for the applicant. If so, determine student aid eligibility based on NSLDS data
- If not, award process can continue while appropriate data provider updates NSLDS – you do not need to wait for NSLDS to be updated
- Sometimes you may need to send documentation to NSLDS to resolve the conflicting information – they will issue you a ticket # and give you a fax number to send the documents to – they will notify you when it is resolved – usually by email.
- NSLDS Customer Support is available for help:
1-800-999-8219



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NSLDS

Comment 132 – Applicant has at least one loan in default.

- ▶ Applicant needs to contact the Guaranty Agency, Direct Loan Servicers or ED Regions that are holding the defaulted loan(s) to make satisfactory arrangements to repay. Appropriate contacts are indicated in ISIR comment text/codes.
- ▶ You can view the defaulted loan(s) and get contact information on the NSLDS website as well.
- ▶ Collect documentation of satisfactory repayment arrangements.
- ▶ If loan is already repaid, collect documentation showing payoff information.



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NSLDS

Comment 134 – Applicant has at least one federal loan in default and has received at least one overpayment of federal student aid funds.

- ▶ Student is NOT eligible to receive any federal aid funds until these items have been resolved.
- ▶ Loan holder information and School codes are provided on ISIR comments or NSLDS Aid History page.

▶ See guidance for comments 132 and 133



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NSLDS

Comment 116 – Applicant has at least one loan in Active Bankruptcy

- ▶ If the loan is defaulted, borrower must provide FAA with documentation from the holder stating that the debt is dischargeable.
- ▶ If the loan was not defaulted, documentation is not required.



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NSLDS

Comment 254 –

- Based on database provided by NSLDS and your reported grade level, student may have received subsidized student loans in excess of loan limits established for the federal loan programs.

Comment 255/260 –

- Based on database provided by NSLDS and your reported grade level, student may have received a total amount of undergraduate student loans that exceeds the loan limits established for the federal loan programs.



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NSLDS

Comments 256 - Based on data provided by NSLDS and your reported grade level, student may have received a total amount of student loans (undergraduate and graduate) that exceeds the loan limits established for the federal loan programs.

- ▶ Determine if student is dependent or independent.
 - If independent, check based on undergraduate or graduate with new loan limits.
 - If dependent and there are Parent PLUS loan denials, check limits.
- ▶ If ok, process aid as student is eligible.

REMEMBER: The student is ineligible for ANY federal aid, not just loans, until this is resolved.



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Drug Conviction

FAFSA Question 23

- Only pertains to convictions while receiving federal aid funds
- Students are required to answer this question
- If left blank – it is assumed “Yes” Comment Code (053)
- Student can update FAFSA with a “No” answer



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Drug Conviction

Comment 056/058 - Applicant reported a drug conviction, or doesn't know

- If response is incorrect, submit correction to CPS.
- Student can complete worksheet provided by Department of Education to determine eligibility for federal aid.
- Not eligible unless applicant completes an acceptable drug rehabilitation program:
 - program that includes at least two unannounced drug tests, and
 - receives, received or qualifies to receive funds from a federal, state or local government program;
 - is recognized by a federal, state or local government program;
 - receives, received or qualifies to receive payment from a federal or state licensed hospital, health clinic or medical doctor.



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Drug Conviction

2017-18 Drug Eligibility Worksheet is not included in the 2017-18 Federal Student Aid Handbook.

To request assistance, the student should call 1-800-433-3243.



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IRS Matches

Codes 361-368

- Relate to discrepancy between marital status as reported on the FAFSA and as reported on the tax return.
- Various codes for parent and student discrepancies.
- FSA encourages, but does not require, institutions to review the applicant's record to determine if the reported status is correct and that the correct income and other information were reported on the FAFSA.



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Virginia Association of Student Financial Aid Administrators

