# Accessing Federal Student Aid for Refugee Youth and Adults

## Resources and Tips for Ensuring Successful Application Processing

*Updated March 2023*

switchboard
connecting resettlement experts

# Table of Contents


**Introduction to Financial Aid** ..... 2

**Federal Student Aid** ..... 2

Key Terms and Definitions 2
Types of Federal Student Aid 3
Determinants of Eligibility 4
Maintaining Eligibility 6

**FAFSA Timeline** ..... 6

**Application Steps and Processing** ..... 7

Filling out the FAFSA 7
Signing the FAFSA 8
FAFSA Review Process 8
Verification Groups and Requirements 9

**Frequently Encountered Challenges & Guidance** ..... 10

Dependency (Youth Under 24 Years Old) 10
Self/Parent Did Not Pay Taxes in U.S. in the Previous Year 12
No Proof of High School Completion (not currently enforced) 13
Bachelor's Degree Not Recognized in the U.S. 14
Cuban/Haitian Entrant with Expiring Parole 16
Changing or Updating Official Name 17
Recommended Steps to Ensure Successful Processing 17

**Frequently Asked Questions** ..... 18

Questions Frequently Asked by Clients 18
Questions Frequently Asked by Service Providers 18
Question Frequently Asked by Financial Aid Professionals 19

**Additional Resources** ..... 20

Studentaid.gov 20
FSA's Knowledge Center 20
National Association of Student Financial Aid Administrators 20
USAHello 20

**Documentation Templates** ..... 21

No Proof of High School Completion 21
No Proof of Foreign Income 22
Bachelor's Degree Evaluation 22
Lack of Parent Contact/Involvement (Client) 23
Lack of Parent Contact/Involvement (Resettlement Agency) 23

Introduction to Financial Aid

The cost of postsecondary education continues to rise each year.[1] For many refugee youth and adults, accessing financial aid determines whether they will be able to pursue their postsecondary academic goals. While supporting clients in applying for financial aid can be a daunting task, having a strong understanding of the policies and requirements can make it less intimidating.

Financial aid is money provided to students to help pay for college or career school.[2] Funds can be used to cover expenses such as tuition and fees, room and board, books and supplies, and transportation. Students can apply to receive financial aid from several different sources, each of which typically has their own application process and requirements. Some of these sources include:

- Federal government
- State government
- Local or city government
- Institutes of higher education (IHE)
- Private foundations or organizations

This toolkit is designed to help resettlement professionals and other service providers navigate federal student aid, including important considerations and tips for supporting refugees, asylees, SIVs, victims of trafficking, Cuban/Haitian entrants, and otherwise eligible humanitarian parolees through the application process.

# Federal Student Aid

The U.S. Department of Education's office of Federal Student Aid (FSA) is the largest provider of student aid in the country, distributing over $150 billion in financial aid to students in college or career school each year.[3] FSA is the federal office responsible for managing the student financial assistance programs authorized under Title IV of the Higher Education Act of 1965.

## Key Terms and Definitions

**Free Application for Federal Student Aid (FAFSA):** The application to apply for federal financial aid, most frequently completed and submitted electronically

**IRS Data Retrieval Tool:** An online tool allowing students to directly transfer their personal and parent's tax return information from the IRS

**Expected Family Contribution (EFC):** The amount used to calculate how much financial aid students are eligible to receive based on information reported through the FAFSA

**Student Aid Report (SAR):** A summary of a student's information reported through the FAFSA and basic information about their eligibility and estimated award *(sent to students)*

**Institutional Student Information Report (ISIR):** A summary of a student's information reported through the FAFSA and key processing results from FSA's Central Processing system *(sent to IHEs)*

---

[1] National Center for Education Statistics. (2019) *Tuition costs of colleges and universities.* U.S. Department of Education. https://nces.ed.gov/FastFacts/display.asp?id=76

[2] Federal Student Aid. *Type of Financial Aid.* U.S. Department of Education. https://studentaid.gov/understand-aid/types

[3] Federal Student Aid. *About Us*. U.S. Department of Education. https://studentaid.gov/about

## Types of Federal Student Aid

FSA offers three types of student aid: grants, loans, and federal work-study. Grant funding and money earned through federal work-study does not need to be repaid. Funding received through loans does need to be repaid plus interest. Review the chart below to learn more about each type.

**TIP:** Financial planning is essential when considering student aid options. Taking out loans is a big responsibility. Make sure clients understand the long-term financial commitment. Prior to suggesting they take out loans, ensure you have exhausted all other state, local, and institution-based grant and scholarship opportunities.

| | |
|---|---|
| **Federal Pell Grant** | Federal Pell Grants are usually only awarded to undergraduate students who display exceptional financial need and have not earned a bachelor's, graduate, or other professional degree.[4] The maximum Pell Grant for the 2023-2024 award year is $7,395 per academic year. Students are eligible to receive the Pell Grant for up to 12 semesters of undergraduate study. |
| **Federal Supplemental Education Opportunity Grant (FSEOG)** | Federal Supplemental Education Opportunity Grant (FSEOG) is discretionary funding allocated by institution based on need. Students can receive up to $4,000 per academic year depending on the institution's available funds.[5] |
| **Direct Subsidized Loan** | Direct Subsidized Loans are offered to undergraduate students who demonstrate financial needs. See How much can I borrow? and What are the current interest rates? for more information.[6] |
| **Direct Unsubsidized Loan** | Direct Unsubsidized Loans are offered to undergraduate, graduate, and professional students. Eligibility is not based on financial need. See How much can I borrow? and What are the current interest rates? for more information.[7] |
| **Direct PLUS Loan** | Direct PLUS Loans are offered to eligible parents and graduate or professional students to help cover expenses not already covered by other financial aid. The maximum PLUS loan amount one can receive is the cost of attendance (determined by the school) minus any other financial aid received. Direct PLUS Loans currently have the highest interest rate of FSA loans: 5.30%.[8] |
| **Federal Work-Study** | Federal Work-Study jobs are designated positions on and off campus for students who demonstrate financial need. Students apply for positions through their institution. Money earned **does not** need to be repaid and can be used at the discretion of the student.[9] |

[4] Federal Student Aid. *Pell Grant.* U.S. Department of Education. https://studentaid.gov/understand-aid/types/grants/pell
[5] Federal Student Aid. *Federal Supplemental Education Opportunity Grant (FSEOG).* U.S. Department of Education. https://studentaid.gov/understand-aid/types/grants/fseog
[6] Federal Student Aid. *Subsidized and Unsubsidized Loans.* U.S. Department of Education. https://studentaid.gov/understand-aid/types/loans/subsidized-unsubsidized
[7] Federal Student Aid. *Subsidized and Unsubsidized Loans.* U.S. Department of Education. https://studentaid.gov/understand-aid/types/loans/subsidized-unsubsidized
[8] Federal Student Aid. *Grad PLUS Loans.* U.S. Department of Education. https://studentaid.gov/understand-aid/types/loans/plus/grad
[9] Federal Student Aid. *Work-Study Jobs.* U.S. Department of Education. https://studentaid.gov/understand-aid/types/work-study

## Determinants of Eligibility

Students must meet certain eligibility requirements in order to qualify for federal student aid. It is important to note that while all ORR-eligible populations are considered eligible noncitizens, they may not meet the other requirements, making them ineligible for some, or all, federal student aid programs.

**In order to be considered for federal student aid opportunities, applicants must:**

- Demonstrate financial need (for most programs);
- Be a U.S. citizen or **an eligible noncitizen;**
- Have a valid Social Security number;
- Be registered with Selective Service, if applicant is male;
- Be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program;
- Be enrolled at least half-time (for most programs);
- Maintain satisfactory academic progress in college or career school; and
- Show they are qualified to obtain college or career school education via:
    - A high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma) or state-recognized equivalent (e.g., General Educational Development [GED] certificate); or
    - Completing one of the ability-to-benefit (ATB) alternatives and is currently enrolled in an eligible career pathway program[10].

**TIP:** Clients who have not completed a high school diploma can still qualify to receive Title IV aid by completing an ATB alternative and enrolling in an eligible Career Pathways Programs. Review approved ATB alternatives here.

### Eligible Non-Citizens (as defined by FSA)

Currently, individuals with the following legal statuses are considered potentially eligible for FSA:

- Lawful permanent residents
- Conditional resident aliens
- Conditional Entrants
- Refugees
- Person granted asylum
- Person paroled into the U.S. for at least one year
- Ukrainian citizens and nationals paroled between 2/24/2022 and 9/30/2023, or the immediate family member of someone who was
- Afghan citizens and nationals paroled between 7/31/2021 and 9/30/2023, or the immediate family member of someone who was
- Cuban/Haitian Entrant (CHE)
- Victims of human trafficking[11]

Accepted forms of evidence of legal status and additional requirements vary by status. To access the comprehensive list, review pages 35-39 of Volume 1 of the FSA Handbook.

[10] Federal Student Aid. *Eligibility Requirements.* U.S. Department of Education. https://studentaid.gov/understand-aid/eligibility/requirements
[11] Federal Student Aid. (2022). 2023-2024 Federal Student Aid Handbook, Volume 1 (pp. 35). U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_vol1.pdf

## Humanitarian Parole Programs

To qualify as a "Person paroled into the U.S. for at least one year," an individual must also provide evidence that they are "in the U.S. for other than a temporary purpose and intends to become a citizen or permanent resident." Generally, an Application to Register Permanent Residence or Adjust Status (Form I-485) or a Petition for Alien Relative (named relative from a petitioner) (Form I-130) are the only accepted forms of evidence.[12] Other evidence of efforts to adjust status, such as filing an Application for Asylum and for Withholding of Removal (Form I-589), are not accepted.

Over the past few years, the U.S. Department of Homeland Security (DHS) has introduced several humanitarian parole programs to provide emergency entry into the United States for those fleeing violence and persecution. New and existing legislation enacted by Congress entitles some humanitarian parolees—namely Afghans[a,c], Ukrainians[b,c], Cubans, and Haitians—to the programs and other benefits available to refugees.

**TIP:** To learn more about legal definitions and eligibility requirements for these groups, refer to the following ORR resources: Benefits for Afghan Humanitarian Parolees, Benefits for Ukrainian Humanitarian Parolees, and Fact Sheet on Cuban/Haitian Entrants.

These groups are not required to have been paroled into the U.S. for at least one year, nor are they required to provide evidence that they are in the U.S. for other than a temporary purpose. The chart below summarizes parolees' FSA eligibility by country of citizenship or nationality (eligibility indicated by a checkmark). As indicated in the middle column, filing a Form I-589 does not disqualify Afghans, Ukrainians, Cubans, or Haitians from being considered eligible noncitizens. However, it is not sufficient to qualify parolees from Nicaragua, Venezuela, or other countries.

| Country of Citizenship or Nationality | Paroled into the U.S. [a, b, c] | Paroled into the U.S. for at least one year, filed I-589 [a, b, c] | Paroled into the U.S. for at least one year, filed I-485 or I-130 |
|---|---|---|---|
| **Afghanistan** [a, c] | ✓ | ✓ | ✓ |
| **Ukraine** [b, c] | ✓ | ✓ | ✓ |
| **Cuba** | ✓ | ✓ | ✓ |
| **Haiti** | ✓ | ✓ | ✓ |
| **Nicaragua** | | | ✓ |
| **Venezuela** | | | ✓ |
| **Other Countries** | | | ✓ |

**TIP:** Remember, individuals who hold one of the following statuses qualify as eligible noncitizens through one of FSA's **existing** eligible noncitizen categories: lawful permanent resident, refugee, person granted asylum, victim of human trafficking.

[a] Afghans paroled into the United States between July 31, 2021, and September 30, 2023,
[b] Ukrainians paroled into the United States between February 24, 2022, and September 30, 2023
[c] Afghans or Ukrainians who are eligible because of an immediate family member
[12] Federal Student Aid. (2022). 2023-2024 Federal Student Aid Handbook, Volume 1 (pp. 37). U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_vol1.pdf

### Eligibility based on an immediate family member

Similarly, individuals who meet the criteria in the chart below are not required to have been paroled into the U.S. for at least one year or provide evidence that "they are in the United States for other than a temporary purpose" to be considered eligible noncitizens by FSA.

| Afghans | Ukrainians |
|---|---|
| An Afghan national paroled into the United States after September 30, 2022, is considered an eligible noncitizen if they are:<br>▪ The spouse or child of an Afghan paroled between July 31, 2021, and September 30, 2023, or<br>▪ The parent or legal guardian of an unaccompanied noncitizen child who was paroled between July 31, 2021, and September 30, 2023. | A Ukrainian national paroled into the United States after September 30, 2023, is considered an eligible noncitizen if they are:<br>▪ The spouse or child of a Ukrainian paroled between February 24, 2022, and September 30, 2023, or<br>▪ The parent or legal guardian of an unaccompanied noncitizen child who was paroled between July 31, 2021, and September 30, 2023. |

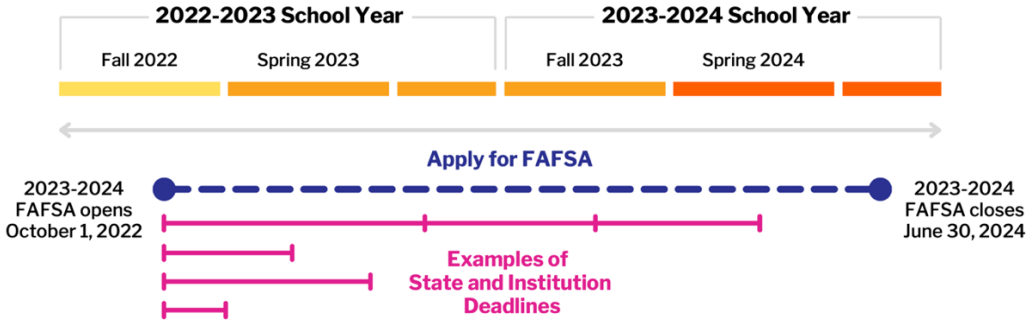
**NOTE:** Afghans who are Special Immigrant Conditional Permanent Residents (SI CPRs) and Special Immigrant Lawful Permanent Residents qualify as conditional resident aliens and lawful permanent residents, respectively.

## Maintaining Eligibility

In order to remain eligible to receive federal student aid, students must continue to meet the above eligibility requirements and make satisfactory academic progress as defined by their institution. Students are required to resubmit the FAFSA application each year with updated income information.

# FAFSA Timeline

As illustrated below, the FAFSA application is open from October 1st of the year prior to the aid period through June 30th at the end of the aid period, spanning three calendar years.




As with many other aspects of federal student aid, states and IHEs have the autonomy to set their own deadlines. When assisting clients in planning for postsecondary opportunities, it is important to pay close attention to the state and institution timelines. Read more about the different types of deadlines here.

States and institutions typically use information reported in the FAFSA to inform their own financial aid awards. In some cases, clients will miss out on other forms of needs-based assistance if they submit their FAFSA application after state or institution deadlines. University deadlines range from late fall to early spring, while

community colleges and technical schools typically have late spring or early summer deadlines. It is also important to clarify whether the deadline is the date the application is submitted or the date it is processed and delivered to the institution. To learn more about these deadlines, review the state deadlines or the institution's financial aid website.

# Application Steps and Processing

Completing the FAFSA is just the first step towards accessing federal student aid. Ensure clients understand that it can be several months before they find out exactly how much federal student aid they will receive.

## Filling out the FAFSA

The Federal Application for Student Financial Aid (FAFSA) is made up of seven sections, two of which are not always required. Most federal student aid programs require students to demonstrate financial needs. FSA uses information from the student's and their parent's (if applicable) U.S. tax return from the previous calendar year to determine a student's Expected Family Contribution and calculate awards. See Dependency (Youth Under 24 Years Old) to determine whether a client must report their parent's information.

For clients who filed taxes in the U.S. during the previous calendar year, they can either import their tax information using the IRS Data Retrieval Tool integrated into the web-based FAFSA application or manually enter information from their Form 1040. If information is manually entered, clients will likely be asked to provide the institution with a copy of the Form 1040(s) and Form W2(s). See the section Frequently Encountered Challenges & Guidance if a client did file a tax return with the IRS for the year in question.

**TIP:** If are planning to assist a client with filing their FAFSA electronically, consider having them complete the .pdf form prior to your appointment to ensure you will have access to all the necessary information. Access and review the entire 2023-2024 FAFSA form.

<table>
<tr><th>Student Information</th><th>Student Dependency</th><th>Student Finances</th></tr>
<tr>
<td rowspan="2">
<ul><li>Personal contact and identifying information</li><li>Spouse's information (if applicable)</li></ul>
Key Information:
<ul><li>SSN</li><li>Alien Number</li><li>Spouse's identifying information</li><li>Parent's education level</li></ul>
</td>
<td>
<ul><li>Review dependency requirements and select any applicable</li></ul>
For more information about Student Dependency, see Dependency (Youth under 24 years old).
</td>
<td rowspan="2">
<ul><li>Information on the previous year's earnings</li><li>Public Benefits Summary</li></ul>
Key Information:
<ul><li>Student's Form 1040 OR IRS Data Transfer</li><li>Information on unreported income.[13]</li></ul>
</td>
</tr>
<tr>
<td>
Parent Information<br>(if applicable)
<ul><li>Parent's Identifying Information</li><li>Information on the previous year's earnings</li><li>Public Benefit Summary</li></ul>
Key Information:
<ul><li>Date of Marriage (if applicable)</li><li>Parent Form 1040(s) and Form W2(s) OR IRS Data Transfer</li><li>Information on unreported income</li></ul>
</td>
</tr>
</table>

[13] Federal Student Aid. *Free Application for Federal Student Aid.* U.S. Department of Education. https://studentaid.gov/sites/default/files/2021-22-fafsa.pdf

## Signing the FAFSA

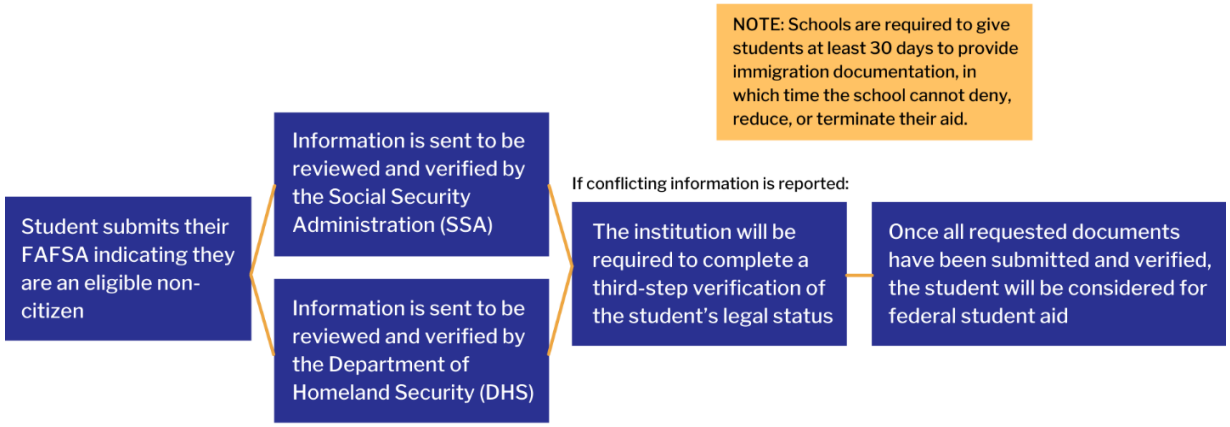
More than 99% of FAFSAs are completed and signed electronically.[14] In order to sign electronically, clients and their parent (if applicable) must set up FSA IDs. To create an FSA ID, clients must have an active email address and social security number. If a client or their parent cannot create an FSA ID, they can print the application, sign it, and submit it via mail. See Dependency (Youth Under 24 Years Old) for more information about when this might be necessary.

**TIP:** If you are assisting a dependent with completing their application, ask the client and their parent (if applicable) to set up their FSA IDs several days prior. Make sure clients save their FSA ID information, including the answers to the security questions. It can be very difficult to reset your password if information is lost.

Once the application has been signed and submitted, students will receive their Student Aid Report, including their estimated Pell Grant award (based on full-time enrollment).

## FAFSA Review Process

Once an application is submitted, it is processed by FSA's Central Processing System (CPS). The CPS conducts data matches with Social Security Administration, Department of Homeland Security, National Student Loan Data System, Department of Defense, Department of Justice, Selective Service, and Veterans Affairs to ensure the information reported is accurate.[15] If a student indicates they are an eligible noncitizen in their application, the following process occurs to verify their status: [16]




**TIP:** Victims of Trafficking will not pass the DHS match. The student will need to provide their certification or eligibility letter from the Department of Health and Human Services (HHS) to the institution when requested. Their financial aid office will need to contact HHS to verify their eligibility.[17]

---

[14] Federal Student Aid. (2021). Application and Verification Guide 2021-2022 (pp. 4). U.S. Department of Education. https://ifap.ed.gov/sites/default/files/attachments/2021-02/2122FSAHbkAVGMaster.pdf
[15] Federal Student Aid. (2021). Application and Verification Guide 2021-2022 (pp. 7). U.S. Department of Education. https://ifap.ed.gov/sites/default/files/attachments/2021-02/2122FSAHbkAVGMaster.pdf
[16] Federal Student Aid. (2020). 2020-2021 Federal Student Aid Handbook, Volume 1: Student Eligibility (pp. 43). U.S. Department of Education. https://ifap.ed.gov/sites/default/files/attachments/2020-07/2021FSAHbkVol1Master.pdf
[17] Federal Student Aid. (2020). 2020-2021 Federal Student Aid Handbook, Volume 1: Student Eligibility (pp. 50). U.S. Department of Education. https://ifap.ed.gov/sites/default/files/attachments/2020-07/2021FSAHbkVol1Master.pdf

## Verification Groups and Requirements

About 30% of FAFSA applications are selected by the Central Processing System for further review. If FSA's Central Processing System selects an application for review, the student's institution is required to verify information reported by students. IHEs may also choose to verify additional information that they believe might be inaccurate. Each IHE has its own policies for the verification process and timeline. Students must comply with the requests of the institution's financial aid department to receive federal financial aid.

**TIP:** Students may have as little as 15 calendar days to present requested documentation. Encourage clients to have the following documentation prepared and kept in a safe, secure place. Also, remind students to regularly check their school and personal email accounts so they do not miss these requests.

There are currently three active verification groups that an application can be assigned to. While the institution is required to provide a list of these documents, it can be helpful to note what might be requested of clients so they can have documentation prepared. Later sections of this guide will address alternate options if a client is unable to access the requested documents.

| V1 – Standard Verification Group[18] | |
|---|---|
| Students in this group must verify the following if they are tax filers:<br>▪ Adjusted gross income<br>▪ U.S. income tax paid<br>▪ Untaxed portions of Individual Retirement Account (IRA) distributions<br>▪ Untaxed portions of pensions<br>▪ IRA deductions and payments<br>▪ Tax-exempt interest income<br>▪ Education credits<br>▪ Household size<br>▪ Number in college | Students who are not tax filers must verify the following:<br>▪ Income earned from work<br>▪ Household size<br>▪ Number of students in college in the household |

| V4 – Custom Verification Group[19] | V5 – Aggregate Verification Group[20] |
|---|---|
| Students must verify identity and statement of educational purpose (SEP). | Students must verify identity and SEP in addition to the items in the Standard Verification Group (V1). |

In the following circumstances, financial aid professionals do have the ability to exempt students from verification if 1.) no conflicting information was reported and 2.) there is not a reason to believe the information is inaccurate.

[18] Federal Student Aid. (2022). Application and Verification Guide 2023-2024 (pp. 61). U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch4-verification-updates-and-corrections.pdf

[19] Federal Student Aid. (2022). Application and Verification Guide 2023-2024 (pp. 62). U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch4-verification-updates-and-corrections.pdf

FAFSA information for parents of a dependent student does not need to be verified if one of the following applies (also includes cases with only one parent):

- Both of the parents are mentally incapacitated.
- Both parents or the custodial parent has died.
- They are residing in a country other than the United States and can't be contacted by normal means.
- They can't be located because the student does not have and cannot get their contact information.

FAFSA information for the spouse of an independent student does not need to be verified if one of the following applies:

- The spouse has died.
- The spouse is mentally incapacitated.
- The spouse is residing in a country other than the United States and can't be contacted by normal means.
- The spouse can't be located because the student does not have and cannot get his or her contact information.[20]

# Frequently Encountered Challenges & Guidance

Due to the circumstances related to ORR-eligible populations displacement and/or resettlement, it is common for clients to encounter challenges when completing the FAFSA. This section describes five of the most common issues clients face, cites related FSA guidance, and provides recommended steps to ensure the successful processing of clients' applications.

It is possible that financial aid professionals at a client's institution may not be familiar with the nuances of FSA policy relating to usual circumstances and alternate reporting options. You may need to ask them to refer to sections of the Federal Student Aid Handbook and other official documents (Dear Colleagues Letters, Electronic Announcements, etc.).

**TIP:** It is important to keep in mind that while FSA creates policy and guidance, institutions are trusted to implement and enforce these rules based on their professional judgment. The recommendations made in this section are based on FSA policy, but each institution may have its own interpretation or process. Work closely with the institution's financial aid office to ensure the successful processing of clients' applications.

## Dependency (Youth Under 24 Years Old)

FSA requires students to report both their personal and parents' information if the student is under 24 years old. There are exceptions to this rule for students with unusual circumstances, several of which ORR-eligible populations could potentially claim.

[20] Federal Student Aid. (2022). Application and Verification Guide 2023-2024, Chapter 4. U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch4-verification-updates-and-corrections.pdf

## Related FSA Guidance and Regulations

**Prequalified Student Dependency Exemptions**

If a client is able to check one of the following boxes, they are considered an independent student on the 2023-2024 FAFSA and generally will not need to provide their parents' information:

- was born before January 1, 2000;
- is married as of the date he or she applies;
- will be a graduate or professional student when the award year starts;
- is currently serving on active duty for purposes other than training;
- is a veteran of the U.S. Armed Forces;
- has dependents other than a spouse;
- was an orphan, foster child, or ward/dependent of the court at any time since the age of 13;
- is an emancipated minor or in legal guardianship or was when the student reached the age of majority in his or her state; or
- was determined at any time since July 1, 2022, to be an unaccompanied homeless youth or unaccompanied, at risk of homelessness, and self-supporting, without regard to such individual's age.[21]

**Student Dependency Override for Unusual Circumstances**

"An FAA may conduct dependency overrides on a case-by-case basis for students with unusual circumstances…

Unusual circumstances include (and may cause any of the above conditions) abandonment by parents, an abusive family environment that threatens the student's health or safety, or the student being unable to locate their parents. In such cases a dependency override might be warranted.

Documentation is critical—it must support, and include the reason for, the decision and should in almost all cases originate from a third party with knowledge of the unusual circumstances of the student."[22] (Also see the case study in Chapter Five of the 2023-2024 Application and Verification Guide.)

## Recommended Steps to Ensure Successful Processing

1. When completing the FAFSA, select the applicable Student Dependency Exemption.

   *or*

2. If the student has been separated from their parent, when completing the FAFSA, select "I am unable to provide information about my parent(s)" to skip the Parent Information section.
   - The student's FAFSA will be rejected initially and their institution's financial aid office will need to complete a Dependency Override. Share documentation detailing their circumstances with the institution's financial aid office (see Documentation Templates).

[21] Federal Student Aid. (2022). Application and Verification Guide 2023-2024, Chapter 2. U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch2-filling-out-fafsa.pdf

[22] Federal Student Aid. (2022). Application and Verification Guide 2023-2024, Chapter 5. U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch5-special-cases.pdf

## Additional Note on Dependency

It is possible that a client has an eligible legal status, but their parent does not. In this case, follow these steps:

> "If your parent does not have a Social Security number (SSN), you should enter all zeroes for him or her on the FAFSA form where it asks for that information. Do NOT enter a Taxpayer Identification Number in the SSN field."[23]

> "If your parent doesn't have an SSN, he or she won't be able to create an FSA ID (which requires an SSN) and therefore won't be able to sign your FAFSA form electronically (either online or via the myStudentAid app). From the online form (you can't print a signature page from the app), you'll need to select the option to print a signature page when you get to the end of the application. Print the page, have your parent sign it, and then mail it to the address indicated so that your FAFSA form can be processed."[24]

> **NOTE:** For Parent PLUS Loans, both the parent and student must have an eligible legal status.[25]

# Self/Parent Did Not Pay Taxes in U.S. in the Previous Year

Since most federal student aid awards are calculated based on expected family contribution, students are asked to report information from their and their parents' (if applicable) U.S. tax return for the previous calendar year. There are alternate income reporting options for the unusual circumstances described below.

## Related FSA Guidance and Regulations

**If a client lived in the U.S. during the year in question and did not file taxes:**

> "If your parent doesn't file taxes at all, select 'Not going to file' for the question that asks whether the parent(s) have filed taxes. Then you'll be asked for information about how much your parent earned from work, rather than being asked for information about specific items on the tax form."[26]

**If a client has recently arrived and did not file a tax return in their host country for the year in question:**

> "Persons from a U.S. territory or commonwealth or a foreign country who are not required to file a tax return can provide the signed statement certifying their income."[27]

**If a client has recently arrived and did file a tax return in their host country for the year in question:**

> "For filers of non-IRS tax returns, you may accept a transcript from a government of a foreign nation or a U.S. territory or commonwealth that has all of the filer's income and tax data to be verified. Or you may accept a copy of the tax return, which must be signed by the filer or one of the filers of a joint return. Use the income and tax data that most closely corresponds to what is on the IRS tax return and convert monetary amounts into U.S. dollars as appropriate."[28]

---

[23] Federal Student Aid. *How should we report information about my noncitizen parents on my FAFSA® form?*. U.S. Department of Education. https://studentaid.gov/help-center/answers/article/how-to-report-info-about-noncitizen-parents-on-fafsa
[24] Federal Student Aid. *How should we report information about my noncitizen parents on my FAFSA® form?*. U.S. Department of Education. https://studentaid.gov/help-center/answers/article/how-to-report-info-about-noncitizen-parents-on-fafsa
[25] Federal Student Aid. *Grad PLUS Loans.* U.S. Department of Education. https://studentaid.gov/understand-aid/types/loans/plus/grad
[26] Federal Student Aid. *How should we report information about my noncitizen parents on my FAFSA® form?*. U.S. Department of Education. https://studentaid.gov/help-center/answers/article/how-to-report-info-about-noncitizen-parents-on-fafsa
[27] Federal Student Aid. (2022). Application and Verification Guide 2023-2024, Chapter 4. U.S. Department of Education. https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch4-verification-updates-and-corrections.pdf
[28] Federal Student Aid. (2022). Application and Verification Guide 2023-2024, Chapter 4. U.S. Department of Education.

## Recommended Steps to Ensure Successful Processing

**If a client (and parent if applicable) did not file a tax return in the U.S. or another country:**

1. When completing the FAFSA, select "I am not going to file" for the question "For 2021, have your parents completed their IRS income tax return or another tax return listed in question 80?" Repeat in student information section if applicable.
2. Be prepared to submit any proof of income (W2, 1099, public benefits, etc.), arrival date, etc. to institution if selected for verification.

**If a client (and parent if applicable) did file a tax return in their host country:**

1. When completing the FAFSA, select "Already Completed" for the question "For 2021, have your parents completed their IRS income tax return or another tax return listed in question 80?" and then "A foreign tax return, IRS 1040NR or IRS 1040NR-EZ" for the questions "What income tax return did your parents file or will they file for 2021?" Enter converted monetary amounts.
2. Be prepared to submit a copy of your tax return and tax account information (if available) if selected for verification. (see Documentation Templates)

# No Proof of High School Completion (not currently enforced)

**NOTE:** Starting in the 2022-2023 school year, the requirement to submit proof of high school completion was removed from the FSA verification process. See DCL GEN-21-06.

High school completion is an eligibility determinant for federal student aid. In rare cases, exceptions can be made for ORR-eligible populations who completed a high school equivalent in their home or host country, but do not have any formal record or proof.

## Related FSA Guidance and Regulations

FHD-A2. "…There may be 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. Therefore, in these rare cases, applicants must submit to the institution:

- Proof of their attempt to obtain documentation of their completion of a secondary school education in a foreign country, i.e., a copy of an e-mail or letter, including proof of mailing.
- A signed and dated statement that indicates that the applicant completed his or her secondary school education in a foreign country, the name and address of the foreign high school where the applicant completed the secondary school education, and the date when the foreign high school diploma was awarded.
- A copy of the entry status documentation that identifies the applicant's current or prior status as a refugee, an asylee, or as a victim of human trafficking and who entered the United States after the age of 15. [Guidance issued 1/24/2014; revised 12/15/2015]".[29]

Also refer to 2020-2021 Student Aid Handbook, Volume 1, Page 12.

---

https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_application-and-verification-guide_ch4-verification-updates-and-corrections.pdf

[29] U.S. Department of Education. *Program Integrity Questions and Answers - High School Diploma.* https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html#fhd

## Recommended Steps to Ensure Successful Processing

1. Email or mail a request to school, maintaining records of your efforts.
2. Write and sign a printed statement including the circumstances, dates attended, and the name and address of the school attended. (see Documentation Templates).
3. Submit proof of immigration status to the student's chosen institution.

### Case Study: Shaista



Shaista is 21 years old and originally from Afghanistan. She and her parents were resettled as refugees in November 2020. Shaista graduated from high school in Afghanistan but was unable to obtain her academic records due to the Taliban's presence in the region. She plans to enroll in community college in Fall 2021 to pursue an associate degree in Chemistry. Shaista's parents paid taxes in Afghanistan in 2019. They have a copy of their records.

**What steps should Shaista and her caseworker take to help ensure successful processing of her FAFSA?**

1. When completing the FAFSA, select "Already Completed" and then "A Foreign tax return" questions regarding income tax returns. Enter converted monetary amounts. Be prepared to submit proof if selected for verification.
2. If possible, mail or mail a request to the secondary school in Afghanistan, maintaining records of your efforts. Using the template on page 19 of this toolkit, write and sign a printed statement including the circumstances, dates attended, and name and address of the school attended. Upon enrollment, submit a signed written statement and proof of humanitarian immigrant status to the institution.
3. Contact the institution's financial aid office and meet with an advisor early to ensure ample time to address additional questions or requests.

## Bachelor's Degree Not Recognized in the U.S.

To qualify for several federal student aid opportunities, students cannot have already received a bachelor's degree. If a client received a bachelor's degree in their home or host country, but professional evaluation determined it to not be equivalent to a U.S. bachelor's degree, an IHE can make an exception.

## Related FSA Guidance and Regulations

"...A student with a baccalaureate or professional degree from a foreign school usually isn't eligible for a Pell Grant. But because a foreign degree often won't translate neatly into the American classification, the school must judge whether it equates to a U.S. bachelor's degree. If the student provides written documentation that the foreign degree is not equivalent to a bachelor's degree awarded in the United States, you may determine that he does not have a bachelor's degree. Documents supporting such a conclusion may include information about the type of school the student attended and total years of education leading to the degree."[30]

In this case, it is up to the school to make the determination of whether the student can access Pell Grant funds.

## Recommended Steps to Ensure Successful Processing

1. To avoid any penalty, when completing the FAFSA, select "Yes" for the question "Will you have your first Bachelor's degree before you begin the 2023-2024 school year?"
2. Upon admission, present degree evaluation to the institution and request written documentation that it does not recognize the degree as equivalent to a U.S. Bachelor's degree.
3. Request the school's financial aid office make the correction to the application.

### Case Study: Virtue



Virtue is 23 years old and originally from Cameroon. She has worked as a cashier since being granted asylum in 2019. In Cameroon, she completed a degree in Business Administration. She had her degree evaluated when she arrived and it was not the equivalent of a U.S. bachelor's degree. She would like to pursue an associate degree in Information Technology at her local community college.

Virtue came to the U.S. alone and now lives with roommates. She supports herself and has filed taxes each year. She has not spoken to her parents in five years.

**What steps should Virtue and her employment specialist take to help ensure successful processing of her FAFSA?**

1. When completing the FAFSA, select "I am unable to provide information about my parent(s)". Using the template on page 21 of this toolkit, prepare and submit documentation to the institution's financial aid office detailing your circumstances related to dependency.

2. When completing the FAFSA, select "Yes" for the questions "Will you have your first Bachelor's degree before you begin the 2023-2024 school year?". Upon enrollment, present the evaluation results to the institution and have them confirm that the degree is not equivalent. Request the institution's financial aid office update your FAFSA.

3. Contact the institution's financial aid office and meet with an advisor early to ensure ample time to address additional questions or requests.

# Cuban/Haitian Entrant with Expiring Parole

Students are required to maintain one of the qualifying legal statuses to qualify for federal student aid. See Determinants of Eligibility. Cuban/Haitian Entrants may encounter challenges when presenting their legal documents if the institution's financial aid office is unfamiliar with the status.

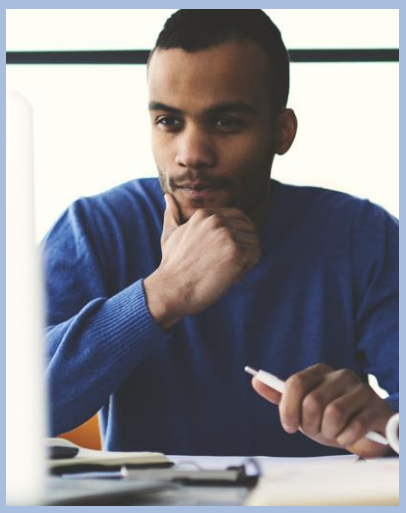
## Related FSA Guidance and Regulations

"Cuban-Haitian Entrant (CHE) as defined by Section 501(e) of the Refugee Education Assistance Act of 1980. All Cuban-Haitian entrants are potentially eligible for Federal Student Aid. Note that certain documents showing that the holder is a Cuban-Haitian entrant continue to convey CHE status even if the expiration date has passed. *When submitting CHE documentation (typically an I-94 with a "Cuban-Haitian Entrant" stamp), click on the Cuban-Haitian Entrant button in SAVE for CHE status verification."*[31]

## Recommended Steps to Ensure Successful Processing

1. When completing the FAFSA, select "I am an Eligible Non-Citizen" and enter accurate ARN and SSN.
2. If selected for verification, ensure the financial aid office understands the client is a Cuban/Haitian Entrant and refers to the Federal Student Aid Handbook for guidance on how to properly enter documentation in SAVE.
3. If applicable, also provide a copy of their USCIS I-797 Approval Notice.

### Case Study: Mateo



Mateo is 20 years old and originally from Cuba. He arrived in the United States with his aunt and uncle in December 2016 and was granted parole as a Cuban/Haitian Entrant. Mateo's parents were killed when he was seven, and he has lived with his aunt and uncle since. They were his legal guardians until he turned 18.

Mateo graduated from high school with honors in Cuba. He has a copy of his transcript and diploma. He plans to pursue a bachelor's degree in mechanical engineering at his local state university.

**What steps should Mateo and his caseworker take to help ensure successful processing of his FAFSA?**

1. When completing the FAFSA, select "I am currently or I was in legal guardianship" and "Since I turned age 13, both my parents were deceased" in the Student Dependency Status section. Be prepared to submit documentation if selected for verification.
2. Enter accurate ARN and SSN. Present documentation if selected for verification. Ensure reviewers are aware of special policies for Cuban/Haitian Parolees.
3. Contact the institution's financial aid office and meet with an advisor early to ensure ample time to address additional questions or requests.

# Changing or Updating Official Name

Whether a student is correcting an error in their name or updating their name for another reason, there are a few things to keep in mind when submitting the FAFSA. When students create an FSA ID, their name and SSN are verified by the Social Security Administration (SSA). The information entered must exactly match what is on record at the SSA or the application will be rejected.

If a student changes their name after already setting up an FSA ID, they will need to update their information before submitting a new application.

## Recommended Steps to Ensure Successful Processing

1. The student must officially change their name with the SSA. For more information on this process, refer to the SSA's Frequently Asked Questions.

2. Once the SSA has processed the request, log in using the client's existing FSA ID and go to "Personal Information" under "Settings" to update their name. Ensure both first and last name exactly match the information on their updated Social Security card.

3. FSA will verify the information provided. You can check the Social Security Administration (SSA) match status on the "Personal Information" page under "Settings."

4. Once the SSA match status has been updated to "Matched," make sure the name entered in the FAFSA form itself has also been updated before submitting.

# Frequently Asked Questions

It is common for clients, service providers, and even financial aid professionals to have questions about clients' federal student aid eligibility and the processing of their FAFSA.

## Questions Frequently Asked by Clients

### Will I need to repay funding received from federal student aid?

It depends. Grants and money earned through federal work-study do not have to be repaid, however, funding from federally sponsored loans does (plus interest). All students with federally sponsored loans are required to complete exit counseling with FSA when they graduate or stop attending school. Exit counseling ensures students understand their student loan obligation and how to begin repayment.[32]

### What happens if I am awarded more in Pell Grant than my school costs? What happens to the extra money?

If students' total award amount is more than their total amount owed, they will receive a refund from the school, typically via direct deposit or check. Students can use this money to help cover other education-related expenses such as books, technology, transportation, housing, etc.

### Why does the FAFSA ask for my social security number and tax information?

To confirm a student is eligible to receive federal student aid, students must provide this identifying information. FSA offices takes many precautions to protect student information.

### I have not decided which school I am going to attend. What should I do?

When completing the FAFSA, include all the schools that you are considering. This ensures that the one you do choose receives your Institutional Student Information Report.

### What happens if I have to drop out of courses and paid for them using federal student aid?

It depends on several factors. Each institution has different policies and deadlines for withdrawing from courses. It is possible that if a student withdrew late in the semester, they would have to repay the grant and loan funds used to pay for tuition. Be sure to read your institution's financial aid agreement closely before signing.

## Questions Frequently Asked by Service Providers

### A client arrived in October and they would like to start at community college in the Spring semester. Can they receive federal student aid?

Yes. As described above in the FAFSA Timeline (pg. 6), students are able to apply for aid until June 30th of the school year. For instance, the 2021-2022 FAFSA application is open from October 1, 2020, until June 30, 2022. While students can apply at any time during that period, states and institutions may not process applications submitted after their designated deadlines. See Additional Timeline Considerations.

---

[32] Federal Student Aid. *Complete Student Loan Exit Counseling.* U.S. Department of Education. https://studentaid.gov/exit-counseling/

### The IHE my client is planning to attend has requested documents that they do not have access to. What should they do?

As described in earlier sections, financial aid professionals are asked to use their professional judgment in unusual circumstances. Students should log their efforts to obtain missing documentation and be ready to submit detailed accounts of the related circumstances. When students are missing important documents because of displacement, it is important to stay in regular contact with the institution's financial aid office to ensure requests are clearly understood and completed on time.

### My client has the documents their institution requested, but they are in their native language. What should I do?

Talk with the financial aid office to see if they require documents to translated and/or evaluated by a certified service.

### Am I considered a preparer?

No, as long as you are helping a client complete the application free of charge, you are not considered a preparer.

## Question Frequently Asked by Financial Aid Professionals

### I do not recognize this immigration document and I do not know if it is an acceptable form of legal documentation.

Encourage financial aid professionals to refer to Volume 1, Chapter 2 U.S. Citizenship & Eligible Noncitizens of the Federal Student Aid Handbook for a comprehensive list of accepted documents.



# Additional Resources

**TIP:** Predatory companies can easily be mistaken for legitimate services, subjecting students to unnecessary fees or worse, identity fraud. You can learn more about avoiding financial aid scams and protecting student information here.

## Studentaid.gov

Studentaid.gov is the U.S. Department of Education's website dedicated to federal student aid. Through this site, users can learn more about federal student aid, access the FAFSA application, request assistance from the Help Center, and much more.

- Complete the FAFSA Application
- FAFSA Deadlines
- Loan Simulator
- Aidan Virtual Assistance
- Frequently Asked Questions

## FSA's Knowledge Center

Formerly the Information for Financial Aid Professionals (IFAP) website, FSA's Knowledge Center consolidates the guidance, policy, and resources related to the administration and processing of Title IV federal student aid, including Dear Colleague letters and the latest Federal Student Aid Handbook. Two of the most referenced sections can be accessed directly through the links below:

- Application and Verification Guide
- Volume 1 - Student Eligibility

## National Association of Student Financial Aid Administrators

The National Association of Student Financial Aid Administrators (NASFAA) "provides professional development and services for financial aid administrators; advocates for public policies that increase student access and success; serves as a forum on student financial aid issues; and is committed to diversity throughout all activities."[33] NASFAA has developed resources specifically on refugee and asylee eligibility:

- Tip Sheet for Refugee and Asylee Students
- Tip Sheet for Financial Aid Administrators Working with Refugee and Asylee Students
- Case Study on Refugees Added to FSA Handbook

## USAHello

USAHello is a free online center that offers information, training, and services to refugees, asylum seekers, immigrants, and other community members. The section on University and Adult Education offers several helpful resources.

- Adult education – how to go back to school
- Scholarships for immigrants and refugees
- Can I transfer my foreign transcripts and credits to the U.S.?
- Find job training programs and get skills for work

[33] *About NASFAA.* National Association of Student Financial Aid Administrators. https://www.nasfaa.org/About_NASFAA

# Documentation Templates

During verification, institutions will seek the most official documentation possible. Special accommodations and alternate reporting options have been established for those who have been forcibly displaced. IHE financial aid professionals are required to use their professional judgement when determining whether documentation meets requirements. Typically, if no official documentation can be provided, signed written statements from the student, their parent (if applicable), or others with knowledge of the student's unusual circumstances, such as their caseworker, will be accepted. This section includes templates to help clients prepare written statements that describe their circumstances or document their efforts to obtain missing documentation.

**TIP:** These templates are generic examples. The financial aid office may require more detail or ask that the student include additional information. Make sure that your clients clearly understand what information is being requested.

## No Proof of High School Completion

[Date]

To Whom It May Concern:

My name is [Name], [Student ID Number]. I have been accepted into [Program Name] at [Institution] and plan to begin courses in the [Semester].

Always include student information

I attended [High School *(or equivalent)* Name] ([Street Address], [City], [Country]) from [Date] to [Date]. [Provide additional details about courses and exit exams taken, grades, etc. if possible].

[Describe circumstances related to displacement. Make sure to include dates. Provide as much detail as you feel comfortable sharing.]

I have made several attempts to obtain official records from the institution, as evidenced below.

- [Date] Descriptions of action taken
- [Date] Descriptions of action taken
- [Date] Descriptions of action taken
- [Date] Descriptions of action taken

Attach copy of emails or letters sent to high school

I have not been able to obtain official records from the institution because [Describe situation, include links to new articles, etc. if possible].

I certify that the above information is true. I have attached a copy of my [Legal documentation of ORR-eligible status].

Print and sign the statement. Have it notarized if required

## No Proof of Foreign Income

[Date]

To Whom It May Concern:

My name is [Name], [Student ID Number]. I have been accepted into [Program Name] at [Institution] and plan to begin courses during the [Semester].

[Describe relevant circumstance related to displacement/resettlement, including dates.]

[Describe any income earned during the year in question.] During [Year], I earned [Dollar Amount] from [Source(s)]. During [Year], my parent(s) earned [Dollar Amount] from [Source(s)].

In [Country], I was not required to file taxes because [Describe circumstances].

*(If applicable)* I have attached copies of income statements.

I certify that the above information is true.

Always include student information

Print and sign the statement. Have it notarized if required

## Bachelor's Degree Evaluation

[Date]

To Whom It May Concern:

My name is [Name], [Student ID Number]. I have been accepted into [Program Name] at [Institution] and plan to begin courses during the [Semester].

I received a degree in [Area of Study] from [Postsecondary Institution *(or equivalent)* Name] ([Street Address], [City], [Country]) in [Date]. After arriving in the United States, I had my degree evaluated by [Evaluation Service Name] on [Date].

[Evaluation Service Name] determined that my degree was not equivalent to a U.S. bachelor's degree. Therefore, I will be working towards my first U.S. bachelor's degree starting in the [Semester].

With your written approval, the financial aid office can adjust my FAFSA status to allow me to qualify for grant and subsidized loan programs.

Always include student information

Make a clear request

## Lack of Parent Contact/Involvement (Client)

[Date]

To Whom It May Concern:

My name is [Name], [Student ID Number]. I have been accepted into [Program Name] at [Institution] and plan to begin courses during the [Semester]. I have attached a notarized statement from my resettlement agency, [Resettlement Agency Name], to attest to my circumstances.

[Client's Name] has been served by [Resettlement Agency Name] since [Date]. [Describe circumstances related to displacement/resettlement, detailing the length and circumstances related to their separation from their parent(s). Make sure to include dates. Provide as much detail as you feel comfortable sharing.]

I certify that the above information is true.

Include a statement from someone familiar with the situation

Print and sign the statement. Have it notarized if required

## Lack of Parent Contact/Involvement (Resettlement Agency)

[Date]

To Whom It May Concern:

My name is [Name] and I am [Client's Name]'s [Caseworker/Employment Specialist] at [Resettlement Agency Name]. I am writing to attest to the information [he/she/they] provide in the attached document.

[Client's Name] has been served by [Resettlement Agency Name] since [Date]. [Describe the circumstances related to the client's displacement/resettlement, detailing the length and circumstances related to their separation from their parent(s). Make sure to include dates. Provide as much detail as the client is comfortable sharing.]

I certify that the above information is true.

Print and sign the statement. Have it notarized if required

## Acknowledgements

This toolkit was authored by Lindsay Dusard. Information and guidance related to the Federal student financial aid programs was derived from various U.S. Department of Education resources, including studentaid.gov and the Federal Student Aid Handbook.

*The IRC received competitive funding through the U.S. Department of Health and Human Services, Administration for Children and Families, Grant #90RB0052. The project is 100% financed by federal funds. The contents of this document are solely the responsibility of the authors and do not necessarily represent the official views of the U.S. Department of Health and Human Services, Administration for Children and Families.*

switchboard
connecting resettlement experts