A student has to be a citizen or eligible noncitizen to receive SFA aid. In this chapter, we discuss what citizenship statuses meet this requirement, and how a student documents his or her citizenship status.

**ELIGIBLE CATEGORIES**

A student must be a citizen or eligible noncitizen to be eligible for aid from the SFA Programs. The general requirement for eligible noncitizens is that they be in the U.S. for other than a temporary purpose. The specific eligible statuses are:

- A U.S. citizen or national.
- A U.S. permanent resident.
- Citizens of certain Pacific Islands (the Freely Associated States).
- Other eligible noncitizens.

The Department performs matches through the application process to verify the student’s status. In addition, there are procedures for a school to follow to confirm a noncitizen’s status through INS if the CPS matches don’t confirm that status.

Students who are eligible because they are citizens of certain Pacific Islands can only receive aid from some of the SFA programs (see “Citizens of the Freely Associated States,” page 49). Students in the other categories are eligible for any type of aid through the SFA Programs if they’re attending an eligible school in the United States. If attending foreign schools that participate in the FFEL Program, these individuals may receive FFELs. If a parent wants to take out a Federal PLUS Loan for a dependent undergraduate student, both the parent and the student must be U.S. citizens or nationals, permanent residents, or eligible noncitizens.²

² Note that the Department doesn’t check a parent’s citizenship status as part of the application process. Parents who are permanent residents or other eligible noncitizens should provide documentation of that status to the school.
U.S. CITIZEN OR NATIONAL

The term “U.S. citizen” includes citizens of the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands. All U.S. citizens are considered to be U.S. nationals. However, not all nationals are U.S. citizens: Natives of American Samoa and Swain’s Island are not U.S. citizens but are nationals and therefore may receive SFA funds.

SSA citizenship match

All applications automatically go through the Social Security Administration (SSA) matching system, which verifies both U.S. citizenship status and Social Security Numbers (SSNs) (see Chapter 4 of this publication for information on the SSN match). The result of the SSA citizenship match is reported as “SSA” (on the ISIR) or “SSA Citizenship Code” (on the SAR) in the FAA Information section of the output document.

If the student leaves the citizenship question on the FAFSA blank, the CPS will still attempt the citizenship match. If there was a complete match with the student’s SSN, name, date of birth, and U.S. citizenship, the CPS will assume the student is a citizen. The CPS will reject the application (for insufficient information) if one of the items did not match, or if the SSA match shows the student is not a citizen.

Note that U.S. citizens born abroad might fail the SSA citizenship match unless they have updated their citizenship information with the SSA (see “Updating Status for Citizens Born Abroad,” page 32).

Successful match

There’s no comment on the output document if the match is successful. Once all four SSA match elements (SSN, citizenship, name, date of birth) have been confirmed, the SSA Citizenship Flag will be carried forward to the next year’s Renewal Application and the match will not need to be performed again in subsequent years (unless the student changes any of the match elements on a later application).

Data doesn’t match

If SSA can’t find a match in its database for the student’s SSN, name, or date of birth, then it can’t provide information about the student’s citizenship. There will be a comment on the output document stating that SSA could not confirm citizenship because of a question about these items. The student will also have a problem with the SSN match in this case. The student should make the necessary corrections to the SSN, name, or date of birth (see Chapter 4 of this publication for a discussion of SSN match problems). When the corrections are sent to the CPS, the CPS performs the match again, and the school should check the new results to see if SSA confirmed the student’s citizenship.

If the school and student have resolved the SSN problems, but still can’t get the student’s citizenship confirmed, the student can instead provide documentation of citizenship. See “Other Documentation” for a list of documentation the school can decide to accept.
Citizenship not confirmed

If the SSA didn’t confirm that the student is a citizen, a comment will be provided explaining that the student either needs to provide documents proving citizenship or make a correction to show that he or she is an eligible noncitizen.

If the student is a citizen, he or she must give the school documentation of his or her citizenship status. If the student submits appropriate documents, the school can disburse aid to the student. Note that, unlike documentation for eligible noncitizens, the school doesn’t submit these documents to the INS, or any other agency, for verification. The school does need to keep a copy of the documents in the student’s file. The student might also want to contact SSA to have it update its database, but doesn’t have to do this to receive aid. See “Other Documentation” for a list of possible documentation.

If the student is an eligible noncitizen, he or she must submit a correction, which must include the A-Number. When the correction is sent in, the CPS will attempt a match with INS to confirm the student’s status (see “INS match,” page 34).

Other Documentation

If a student must document his or her status as a citizen or national, the school decides what it considers acceptable documentation. The Department doesn’t specify what documentation is acceptable. However, the following are some types of certification the school might choose to use:

- A copy of the student’s birth certificate showing that he or she was born in the United States.

- A copy of Form FS-240 (“Report of Birth Abroad of a Citizen of the United States”), the FS-545 (“Certificate of Birth-Foreign Service”), the DS-1350 (“Certificate of Birth”), or the INS Form G-639 (the Freedom of Information Act Form). The first three forms are generated by the State Department and include an embossed seal with the words “United States of America” and “State Department.”

- A U.S. passport, which may be current or expired. (In the case of nationals who are not citizens, the passport will be stamped “Noncitizen National.”)

- A Certificate of Citizenship from the INS. This certificate must include at least the following information:
  - the student’s name,
  - the certificate number (found in the upper right hand corner), and
  - the date the certificate was issued.
• A Certificate of Naturalization from the INS. This certificate must contain at least
  Δ the student’s name,
  Δ the certificate number (found in the upper right hand corner),
  Δ the INS A-Number,
  Δ the name of the court that granted the naturalization, and
  Δ the date of naturalization.

Older versions of the Certificate of Citizenship and of the Certificate of Naturalization advise the holder not to photocopy them. The INS, however, permits photocopying of these documents if done for lawful purposes (such as applying for SFA funds).

**Updating Status for Citizens Born Abroad**

Even though students are considered U.S. citizens when born abroad to parents who are U.S. citizens, the SSA database is not automatically updated to indicate the student’s status even if the student’s birth was registered. Therefore, such students (for example, those born on military bases abroad) will fail the SSA citizenship match until the SSA database is corrected. That is, the applications of U.S. citizens who were born abroad but who file as U.S. citizens are automatically flagged by the SSA as ineligible foreign born, even if the applicant has an SSN.

Such students can document citizenship by providing a “Certificate of Birth Abroad.” If the birth of the student was (before he or she reached age 18) registered with the American consulate or embassy in a foreign country, the student can receive a copy of the certificate by contacting

Department of State  
Passport Correspondence Branch  
1111 19th St. S.W., # 510  
Washington, DC 20522-1705  
202-955-0737

The student should provide the following information: Name given at birth; date and place of birth; daytime phone number; parents’ names and their dates and place(s) of birth; and a $10 check or money order made to the Department of State. Students will receive either form FS-240 or DS-1350. This process takes four to eight weeks. The student might also want to contact SSA about updating its database.

If the student’s over 18 and the birth wasn’t registered, he or she can file a self-petition for a “Certificate of Citizenship” to any local U.S. INS office (Form N-600). Proof of the parents’ U.S. citizenship at the time of the student’s birth must be provided.
SSA Citizenship Match

<table>
<thead>
<tr>
<th>Result</th>
<th>Match flag</th>
<th>“C” code or rejected application</th>
<th>Comment number and text</th>
<th>Action needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSA confirmed citizenship status</td>
<td>A or blank</td>
<td>No</td>
<td>None</td>
<td>If the student is a U.S. citizen, he or she should provide documentation (see “Other Documentation,” page 31). If the student is an eligible noncitizen, he or she should correct Item 14 and provide a valid A-Number. If the student is then successfully matched with INS as an eligible noncitizen, no further resolution is necessary.</td>
</tr>
<tr>
<td>SSA did not confirm citizenship status</td>
<td>B,C,D,E,F,*</td>
<td>C code</td>
<td>146 We sent your application to Social Security Administration (SSA) to verify your citizenship status. The SSA did not confirm that you are a U.S. citizen. You need to provide your school with documentation of your citizenship status before you can receive Federal student aid. If you are an eligible noncitizen, you must correct Item 14 on this SAR and provide your Alien Registration Number if necessary.</td>
<td>Make any necessary corrections to SSN, name, or date of birth so record can be sent back for matching. Review subsequent transactions for the updated match results. If the student believes the information originally reported is correct, he or she should contact SSA so that it may update its database. The school may pay the student if it receives documentation of the student’s citizenship status (see “Other Documentation”).</td>
</tr>
<tr>
<td>SSA could not confirm citizenship status because there was no match on SSN, name, or date of birth</td>
<td>N</td>
<td>C code</td>
<td>062 In addition, the Social Security Administration could not confirm your claim of U.S. citizenship because of questions about your social security number, name, or date of birth.</td>
<td></td>
</tr>
</tbody>
</table>
• **Conditional entrants.** These individuals are refugees who entered the United States under the seventh preference category of P.L. 89-236 or whose status was adjusted to lawful permanent-resident alien under that category. Note that INS stopped using this category on March 31, 1980;

• **Persons paroled into the U.S. indefinitely for humanitarian reasons.** These individuals are allowed to enter the United States under emergency conditions or under the determination that their entry is in the public interest. This status is temporary;

• **Cuban-Haitian entrants.**

Some noneligible statuses are:

• **Family unity status.** Such individuals have been granted relief from deportation under the Family Unity Program. Previously they were eligible for SFA funds.

• **Temporary residents.** These individuals are allowed to live and work in the U.S. under the Legalization or Special Agricultural Worker program. Previously they were eligible for SFA funds.

• **Individuals with nonimmigrant visas.** This includes those with work visas, and students, visitors, and foreign government officials.

**INS match**

To verify the citizenship statuses of U.S. permanent residents and other eligible noncitizens, the Department collects Alien Registration Numbers (A-Numbers) on the FAFSA. (The INS assigns A-Numbers to all legal immigrants.) If the applicant indicates on the FAFSA that he or she is an eligible noncitizen and provides an A-Number, identifying information from the FAFSA is automatically sent to the INS for confirmation. This verification process, performed by the INS, is known as “Primary Confirmation.”

The results of the match are shown by a match flag in the FAA Information section of the output document, under the heading “INS” (on the ISIR) or “INS Match Flag” (on the SAR). There will also be a comment about the results on the output document.

Because all applications are sent to the SSA match, an application that undergoes the INS match will also undergo the SSA citizenship match. Results from the INS match take precedence over any results from the SSA citizenship match. Therefore, in cases where the INS match is conducted, the SSA citizenship match flags aren’t on the output document, and the school should follow the usual procedures for resolving any INS match discrepancies.

---

3 Although we use the word “verification,” this process is not related to the Department’s verification requirements, which are discussed in Chapter 8.
Note that if a student leaves the citizenship question blank but provides an A-Number, the CPS will assume the applicant is an eligible noncitizen and will forward the A-Number to the INS to confirm eligibility. If the student leaves both the citizenship question and A-Number blank, the CPS won’t attempt the match with the INS, although as mentioned earlier it will match with SSA. If the student isn’t a citizen, the application will be rejected, and the student must submit a correction with the correct citizenship status and an A-Number if he or she is an eligible noncitizen.

**INS Verification Number**

When an INS match is conducted, a 13-digit INS Verification Number is assigned to the student and printed in the FAA Information section. The school will need this number if it has to check the student’s status through the secondary process the Department has with the INS (see “Secondary Confirmation”). Note that if no INS match can be made because a student failed to provide an A-Number on the application, that student won’t receive an INS Verification Number. The student’s information should be resubmitted with the A-Number so that a computer match may be attempted, because the school won’t be able to check the student’s status through the secondary process unless it has an INS Verification Number.

**Successful match**

If the INS confirms the student’s citizenship status through the match, then the student can receive aid. The output document with the successful match results is documentation of the student’s eligible status. Of course, if the school has other information about the student’s status that seems to contradict the successful match result, it must resolve the conflicting information before paying the student (see “Conflicting Information” in the Introduction to this publication).

**Not enough information**

If the student said he or she was an eligible noncitizen but didn’t provide an A-Number, or the A-number was illegible or invalid, the match won’t be attempted. Instead, the student will receive a comment explaining that there’s a question about the A-Number, and directing the student to provide documentation of his or her eligibility to the school. The student will need to submit a correction with the correct A-Number, so that the match can be conducted. The school can’t use Secondary Confirmation to confirm the student’s status.

Note that citizens of the Marshall Islands, the Federated States of Micronesia, and Palau will get the same comment because such students won’t have A-Numbers to report. However, these students aren’t required to provide proof of eligible noncitizen status (see “Citizens of the Freely Associated States,” page 49).
## INS Match

<table>
<thead>
<tr>
<th>Result</th>
<th>Match flag</th>
<th>“C” code or rejected application</th>
<th>Comment number and text</th>
<th>Action needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student’s eligible non-citizen status confirmed by INS</td>
<td>Y</td>
<td></td>
<td>143 Your citizenship status has been confirmed by the Immigration and Naturalization Service (INS), and you meet the citizenship requirements for Federal student aid.</td>
<td>None</td>
</tr>
<tr>
<td>Match not conducted because student did not provide enough information (including a valid A-Number)</td>
<td>blank</td>
<td>C code</td>
<td>142 The Immigration and Naturalization Service (INS) could not confirm your statement that you are an eligible noncitizen because there is a question about your alien registration number. You must submit proof of your noncitizen eligibility to your school within 30 days after you give this SAR to your school. If you fail to submit proof within 30 days, you may be found ineligible for Federal student aid.</td>
<td>The student should make corrections to provide the missing information. When the corrections are submitted, the application will be matched with the database; the school should check the new output document for match results. This comment will also appear for certain non-citizens not required to have A-Numbers (see “Citizens of the Freely Associated States,” page 49).</td>
</tr>
<tr>
<td>INS did not confirm student’s eligible non-citizen status</td>
<td>N</td>
<td>C code</td>
<td>144 The Immigration and Naturalization Service (INS) did not confirm your statement that you are an eligible noncitizen. You must submit proof of your noncitizen eligibility to your school within 30 days after you give this SAR to your school. If you fail to submit proof within 30 days, you may be found ineligible for Federal student aid.</td>
<td>Secondary Confirmation required (see “Using the G-845S for Secondary Confirmation,” page 41).</td>
</tr>
</tbody>
</table>

### Match Flag for No Confirmation

**N**

### Comment for No Confirmation

144

#### Status not confirmed

If the match was conducted, but the INS didn’t confirm the student’s status, the school must resolve the discrepancy before paying the student. Although the student isn’t automatically ineligible for SFA funds, additional procedures may be necessary to document the student’s eligibility. This subsequent process is called Secondary Confirmation.

The student will have a comment on the output document explaining that his or her status wasn’t confirmed. The comment also tells the student to submit documentation to the school. The school...
### INS Match (continued)

<table>
<thead>
<tr>
<th>Result</th>
<th>Match flag</th>
<th>“C” code or rejected application</th>
<th>Comment number and text</th>
<th>Action needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Match not conducted because student did not indicate citizenship status</td>
<td>blank</td>
<td>Reject 17</td>
<td>068 You did not indicate on your application that you are a U.S. citizen or an eligible noncitizen. To be eligible to receive Federal student aid, a student must be—(1) A U.S. citizen (or U.S. national), or (2) An eligible noncitizen, such as a U.S. permanent resident or a resident of certain Pacific Islands, or (3) An eligible noncitizen as determined by the Department of Education</td>
<td>If student failed to indicate citizenship, citizenship match with SSA was still conducted. If that match confirmed the student’s citizenship, the application will not be rejected, and no resolution is required, although the student should make a correction to indicate he or she is a citizen or national. If SSA did not confirm the student’s citizenship, the student receives Reject 17 and resolution is required. The student should provide correct information on his or her citizenship status in Item 14. The student should also provide an A-Number if he or she is an eligible noncitizen. The student’s record can then be sent through the INS match; the school should review the INS match flags on the new output document.</td>
</tr>
<tr>
<td>Match not conducted because student changed status from eligible noncitizen to citizen or changed confirmed A-Number</td>
<td>blank</td>
<td>C code</td>
<td>141 You changed your response to citizenship or you changed the alien registration number verified with INS. You must submit proof of your citizenship status to your FAA.</td>
<td>The school must determine why the student made the change and resolve any conflicting information. The student may need to submit proof of citizenship, depending on the reason for the change.</td>
</tr>
</tbody>
</table>

can use this documentation to perform Secondary Confirmation. However, if the student submitted incorrect information on the application, the student may instead make a correction so that the CPS can attempt the match again.
Status not Confirmed Example

On his original application, Hector reported that he was a citizen, and didn’t report his A-Number. When SSA didn’t confirm this, he told the FAA at Guerrero University that he was a permanent resident. Hector made a correction, but the INS didn’t confirm his status as an eligible noncitizen. This time, he explained to the FAA that he had applied for permanent resident status, but didn’t have documentation yet. The FAA told him that when he had documentation that his application was approved, he should bring it to Guerrero, so that it could be submitted to the INS for confirmation.

Secondary Confirmation

If the INS can’t confirm a student’s claim to be an eligible noncitizen or a school has conflicting information about a student’s citizenship status, the school has to use a secondary process to confirm the student’s status. The student has to give the school documentation showing that he or she is an eligible noncitizen. If this documentation doesn’t seem to provide reasonable evidence that the student is an eligible noncitizen, the school can determine that the student isn’t eligible for SFA funds. However, if the student provides documentation that appears to demonstrate that he or she is an eligible noncitizen, the school submits the documentation to the INS to confirm that the documentation is valid. This collection and submission of additional material is known as “Secondary Confirmation.”

Acceptable Documents

The standard documentation for a permanent resident of the United States is the Alien Registration Receipt Card (Form I-151 or Form I-551). Both forms are referred to colloquially as “green cards,” although the newly issued forms are most often white with blue or pink wavy lines. The INS is replacing cards issued before 1979 with these new, counterfeit-resistant cards. The deadline established for permanent residents to replace their old cards was March 20, 1996. However, the older Form I-151 cards remain acceptable as evidence of permanent residence for the purpose of receiving SFA funds. A passport or a Departure Record (Form I-94) is also acceptable if it has one of the following stamps:


- An I-94 stamped “Temporary Form I-551. Admission for permanent residence at ______________[port] on ______________[date] verified. ______________[signature of issuing officer] ______________[title].” This I-94 will also contain the individual’s photo and an INS seal over the photo and the stamp.

For other types of eligible noncitizens, evidence of their status is on the I-94. The I-94 will contain one of the following:

- **Refugees.** A stamp reading either “Admitted as a Refugee Pursuant to Section 207 of the Act. If you depart the United States you will need prior permission to return. Employment Authorized,” or “Status changed to refugee pursuant to Section 207 (c)(2) of the Immigration Nationality Act, on __________. Employment Authorized.” Refugees may also have a Refugee Travel Document (Form I-571), which can be used for documentation if it’s unexpired.

- **Asylees.** A stamp reading “Asylum status granted pursuant to Section 208, INS. Valid to ______________. Employment Authorized.”
There is one unusual circumstance where the school will need to collect documentation from the student but not submit it to the INS for Secondary Confirmation. The Jay Treaty of 1794 (as well as subsequent treaties and U.S. immigration law) gives Canadian-born Native Americans with "50% Indian blood" the legal right to live and work in the United States. Such individuals are not subject to the legal restrictions typically imposed on aliens by the INS, are not required to obtain documentation from the INS, and are considered "lawfully admitted for permanent residence."

Because few SFA applicants are eligible under the Jay Treaty, the FAFSA does not include a separate response for such students. Therefore, any student eligible for SFA funds through the Jay Treaty should report that he or she is an "eligible noncitizen" and fill in "A999999999" for the A-Number. The application will not be matched with INS, and a comment (comment 142) will be printed on the output document.

The school must obtain proof that the student has 50% Native American blood and was born in Canada. To do so, the student should provide one or more of the following documents:

- 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.
- Identification from a recognized Native American provincial or territorial organization.

If the student can provide one of the above forms of documentation, and is otherwise eligible, the school must document the file and can award SFA funds.

Special circumstances

If the student has an I-551 with a baby picture, he or she should update the I-551 with INS. Permanent residents are expected to get a new picture and be fingerprinted at the age of 14. However, the school can submit the documents to INS and...
ultimately pay a student who has an I-551 with a baby picture, as long as the school can confirm that the I-551 belongs to the student. The school can confirm this by comparing the I-551 to a current photo ID that has the student’s name, date of birth, and signature. (The current photo ID must also be consistent with any identifying information in the student’s file at the school.)

A student who has an approved application for permanent residence on file with INS and who is waiting for an Alien Registration Receipt Card may not have proof of his or her citizenship status. The student should contact his or her local INS office for the passport stamp or I-94 stamp described on page 38, as these are available to the student before the normal permanent-residency documentation is issued. Note that an application for permanent-resident status is not sufficient for determining eligibility for SFA funds.

The Marriage Fraud Amendments established a two-year conditional permanent-residence status for certain alien spouses and their children. The alien spouse of a U.S. citizen or legal immigrant is given conditional permanent-residence status if the marriage took place less than two years before the spouse applied for permanent-residence status or citizenship. This status may also apply to any of the spouse’s children who are aliens.

An alien who is granted conditional permanent-residence status will be given a Form I-551. This form is the same I-551 that is issued to regular permanent residents, except that the card will have a “C” (for “conditional”) on the front and an expiration date on the back. Once the two-year period expires, a conditional permanent resident must file a petition for removal of this restriction within 90 days after the end of that period. The alien’s petition will then be reviewed. If the results of the review are satisfactory, the restriction will be dropped, and new documents will be issued. Conditional permanent residents holding an I-551 with a valid expiration date are eligible to receive aid under the SFA Programs.

If a person is applying to suspend deportation, he or she must request a hearing before an Immigration Law judge who will render an oral or written decision. If the decision is favorable, the INS will give the applicant a Form I-551, which will certify his or her lawful permanent-resident status. Therefore, there is no special category for persons who have been granted suspensions of deportation.

Documents showing noneligible statuses

If the document a student submits is for a noneligible status, the school shouldn’t submit the documentation for Secondary Confirmation. The INS can only confirm whether or not the documentation is genuine; it doesn’t determine whether the student is eligible for SFA aid. Unless the student can submit
documentation for an eligible status, as described above, the student can’t receive aid.

An approved Form I-797, “Application for Voluntary Departure Under the Family Unity Program,” indicates that the student has been granted relief from deportation under the Family Unity Program. Students with this status are no longer eligible for SFA aid.

The Immigration Reform and Control Act of 1986 (IRCA) established a legalization program (also called the amnesty program) for certain illegal aliens. The alien might eventually be granted permanent resident status. Although these individuals were given documentation that allowed them to work while their application was being processed, they aren’t eligible for SFA aid until their application for permanent resident status is approved. Documents such an individual might have in the interim are the Employment Authorization Card (Form I-688A), Employment Authorization Documents (Form I-688B or the I-766), or the Temporary Resident Card (Form I-688). None of these documents qualify the student for SFA eligibility.

A student with a nonimmigrant visa isn’t eligible for SFA funds unless he or she has a Form I-94 with one of the endorsements listed earlier. Nonimmigrant visas include the F-1, F-2 or M-1 Student Visa, B-1 or B-2 Visitor Visa, J-1 or J-2 Exchange Visitors Visa, H series or L series Visa (which allow temporary employment in the U.S.), or a G series Visa (pertaining to international organizations). Also, someone who has only a “Notice of Approval to Apply for Permanent Residence (I-171 or I-464)” cannot receive SFA funds.

Some students may present Forms I-94 stamped “Temporary Protected Status.” This status is used for persons who are from countries that are in upheaval, but the status differs significantly from “Refugee” or “Asylum” because it provides no conversion to permanent-resident status. A student with this status is not eligible for SFA funds.

**Using the G-845S for Secondary Confirmation**

To initiate Secondary Confirmation, the school must complete a Form G-845S. The G-845S (“Document Verification Request”) is a standard INS form that is used to ask the File Control Office at INS to confirm that a noncitizen’s documentation is valid. A copy of the G-845S is on pages 43 and 44.

To complete the G-845S, fill in each item on the top half of the form. The A-Number is provided in the first item; “Education Grant/Loans/Work Study” must be marked in Box 8, “Benefits.” The FAA must state his or her name as the submitting official and the school’s name as the submitting agency. Under Item 6, “Verification Number,” the school must provide the 13-digit number that is located in the FAA
Elimination of Verification Number Exception
In previous years, if the INS match failed due to processing problems, the student’s output document would have no Verification Number, but the school would need to perform Secondary Confirmation to verify the student’s status. In those cases, schools were allowed to send a G-845S for Secondary Confirmation without the Verification Number, as long as they noted the specific comment associated with the processing failure (Comment 145) on the G-845S. Beginning with the 1999-2000 award year, the processing failure results and comment have been eliminated, because the Department has set up the processing system to prevent match failures in individual cases. Therefore, schools must provide a Verification Number on every G-845S it sends to INS. Note that the Department will notify schools if there are general problems with or changes to any of the matches.

Procedure Requirements Cite
34 CFR 668.135

Determining Eligibility if INS Response is Late Cite
34 CFR 668.136(b)

Information section with the match flags. Secondary Confirmation requests sent to INS without Verification Numbers will be returned unprocessed.

Photocopies of the front and back sides of the student’s citizenship document must be attached to the Form G-845S. Be sure to submit each pertinent visa and document along with the G-845S. The G-845S is used only to certify the authenticity and identity of immigration documents attached to it; the G-845S can’t be submitted to INS by itself for determining a student’s eligibility for SFA funds. A student who has lost documents or surrendered these documents when entering prison is responsible for obtaining copies of these documents before the G-845S is submitted. (See “Replacing Lost INS Documents,” page 50.) Schools can request copies of immigration documents directly from penal institutions at the request of the student. The school must send the completed G-845S and attachments to the File Control Office serving its locale no more than 10 business days after receiving the documentation from the student.

A status-verifier at the District INS Office will search the student’s record to confirm his or her immigration status. The status-verifier at the INS office completes the “INS Response” section of the G-845S and sends it back to the school, generally within 10 working days of receipt. The Department recommends that the school document its mailings to INS. If the school hasn’t heard from INS, it might want to call the INS office to make sure that the G-845S was received. If the school doesn’t receive a determination from INS within 15 working days (10 working days plus 5 days mail time) of the date the school sent the G-845S, the FAA should review the file to determine whether he or she feels the student meets the citizenship eligibility requirements based on the documentation the student provided and the information in this chapter. If the FAA believes that the student meets the requirements, the school can make any disbursement for which the student is otherwise eligible; the school, however, must note in the student’s file that INS exceeded the time allotment and, thus, citizenship eligibility was determined without the benefit of INS verification.

When Secondary Confirmation results in an eligible status, the school must keep the G-845S. If a discrepancy is discovered as a result of the INS response, the school must notify the student that he or she must correct the discrepancy with INS and that no certification of loans or further disbursement of funds can be made until the discrepancy is corrected. If the discrepancy isn’t reconciled with INS, the student must repay all aid except wages earned under FWS. Whenever the student is able to provide new information, it must be submitted to INS on a new G-845S.

As long as the school has followed the procedures outlined here, including notifying the student of the discrepancy and withholding further payments and loan certifications as soon as a discrepancy is
**Section A - to be completed by the submitting agency.**

To: Immigration and Naturalization Service

From: Typed or Stamped Name and Address of Submitting Agency

Attn: Status Verifier

(INS may use above address with a #10 window envelope.)

1. Alien Registration or I-94 Number

2. Applicant’s Name (Last, First, Middle)

3. Nationality

4. Date of Birth (Month/Day/Year)

5. Social Security Number

**Section B - to be completed by INS**

INS RESPONSE: From the documents or information submitted and/or a review of our records we find that:

1. ☐ This document appears valid and relates to a *Lawful Permanent Resident alien* of the United States.

2. ☐ This document appears valid and relates to a *Conditional Resident alien* of the United States.

3. ☐ This document appears valid and relates to an alien *authorized employment* as indicated below:
   a. ☐ Full-Time
   b. ☐ Part-Time
   c. ☐ No Expiration (Indefinite)
   d. ☐ Expires on (specify Month/Day/Year, below)

4. ☐ This document appears valid and relates to an alien who has an application pending for (specify INS benefit below)

5. ☐ This document relates to an alien having been *granted asylum/refugee* status in the United States.

6. ☐ This document appears valid and relates to an alien *paroled* into the United States pursuant to Section 212 of the I&N Act.

7. ☐ This document appears valid and relates to an alien who is a *Cuban/Haitian entrant*.

8. ☐ This document appears valid and relates to an alien who is a *conditional entrant*.

9. ☐ This document appears valid and relates to an alien who is a *nonimmigrant* (specify type or class below)

10. ☐ This document appears valid and relates to an alien *not authorized employment* in the United States.

11. ☐ Continue to process as legal alien. INS is searching indices for further information.

12. ☐ This document is *not valid* because it appears to be (check all that apply)
   a. ☐ Expired
   b. ☐ Altered
   c. ☐ Counterfeit

<table>
<thead>
<tr>
<th>Benefit</th>
<th>Your Case Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>AFDC</td>
<td></td>
</tr>
<tr>
<td>Education Grant/Loans/Workstudy</td>
<td></td>
</tr>
<tr>
<td>Food Stamp</td>
<td></td>
</tr>
<tr>
<td>Housing Assistance</td>
<td></td>
</tr>
<tr>
<td>Medicaid/Medical Assistance</td>
<td></td>
</tr>
<tr>
<td>Unemployment Insurance</td>
<td></td>
</tr>
<tr>
<td>Employment Authorization</td>
<td></td>
</tr>
<tr>
<td>Other (specify)</td>
<td></td>
</tr>
</tbody>
</table>

**Please see reverse for additional comments.**
Comments
13. □ No determination can be made from the information submitted. Please obtain a copy of the original alien registration documentation and resubmit.
14. □ No determination can be made without seeing both sides of the document submitted (please resubmit request).
15. □ Copy of document is not readable (please resubmit request).

“PRUCOL”
For Purposes Of Determining If Alien Is Permanently Residing Under Color Of Law Only!
16. □ INS actively pursues the expulsion of an alien in this class/category.
17. □ INS is not actively pursuing the expulsion of an alien in this class/category, at this time.

Instructions
- Submit copies of both front and back of alien’s original documentation.
- Make certain a complete return address has been entered in the “From” portion of the form.
- The Alien Registration Number (“A” Number) is the letter “A” followed by a series of (7) or (8) digits. Also in this block may be recorded the number found on Form I-94. (Check the front and back of the I-94 document and if the “A” Number appears, record that number when requesting information instead of the longer admission number as the “A” Number refers to the most integral record available.)
- If Form G-845 is submitted without copies of applicant’s original documentation, it will be returned to the submitting agency without any action taken.
- Address this verification request to the local office of the Immigration and Naturalization Service.
found, the school isn’t liable for aid disbursed prior to Secondary Confirmation. (This, of course, assumes that the school had no other conflicting information prior to making the disbursement and had reviewed the documentation and felt on that basis that the student was eligible.)

**Interpreting the INS response**

The G-845S has a number of checkboxes for the INS response. The status verifier will mark one or more of the boxes. The following list explains for each checkbox whether checking the box means the student is eligible. In reviewing the INS response, bear in mind that the G-845S reflects the student’s most recent status with the INS and may show a different status than the documentation presented by the student. In this case, the school should verify that both documents identify the same person. If so, the status on the G-845S should be used since that status is the most current.

- **1. This document appears valid and relates to a Lawful Permanent Resident alien of the United States.** Block #1 is checked when the documentation submitted is determined to be a valid I-551, I-151, I-181, or I-94 or a passport stamped with the notation “Processed for I-551, Temporary Evidence of Lawful Admission for Permanent Residence.” A student with this status is eligible for SFA aid.

- **2. This document appears valid and relates to a Conditional Resident alien of the United States.** This is checked when the documentation submitted is determined to be a valid I-551, I-181, or I-94 or a passport stamped with the notation “Processed for I-551, Temporary Evidence of Lawful Admission for Permanent Residence.” A student with this status is eligible for SFA aid.

- **3. This document appears valid and relates to an alien authorized employment as indicated below.** This is checked to indicate whether the authorization covers full-time or part-time employment and when, if applicable, the period of employment will expire. “Indefinite” will be indicated if there is no specific expiration date for employment eligibility. Employment authorization by itself doesn’t mean that the student is eligible for SFA funds. Unless some other eligible status is also checked, or the student can provide other documentation that can be confirmed by the INS, the student isn’t eligible for SFA aid.

- **4. This document appears valid and relates to an alien who has an application pending for...:** This is checked when an alien is waiting for a new immigration status or a change of immigration status. If a change of status is pending, the appropriate block indicating the current status will also be checked elsewhere on the G-845S. A pending application for an immigration status doesn’t (by itself) make the student eligible for SFA funds. To be eligible, the student must have an eligible status checked on the form, or provide other documentation of an eligible status.
• 5. This document relates to an alien having been granted asylum/refugee status in the United States: This is checked when an alien has been granted asylum or refugee status in the United States. Documentation presented may include either Form I-94 stamped with “Section 207-Refugee” or “Section 208-Asylee” or a Refugee Travel Document (Form I-571). A student with this status is eligible for SFA aid.

• 6. This document appears valid and relates to an alien paroled into the United States pursuant to Section 212 of the I&N Act: This is checked for an alien who has been allowed to enter the United States under emergency conditions or under the determination that his or her entry is in the public interest. This status is temporary. Documentation presented may include Form I-94 stamped with “Section 212(d)(5) - Parolee.” A student with this status is eligible for SFA aid.

• 7. This document appears valid and relates to an alien who is a Cuban-Haitian entrant: This is checked for Cubans who entered the United States illegally between April 15, 1980 and October 10, 1980 and Haitians who entered the country illegally before January 1, 1981. A student with this status is eligible for SFA aid.

• 8. This document appears valid and relates to an alien who is a conditional entrant: This is checked for conditional entrants under the old provisions of P.L. 89-236. Documentation presented may include Form I-94 stamped with “Section 203(a)(7).” Noncitizens who fall into this category had to have entered the United States prior to the enactment of the Refugee Act of 1980. A student with this status is eligible for SFA aid.

• 9. This document appears valid and relates to an alien who is a nonimmigrant. This is checked to indicate an alien who is temporarily in the United States for a specific purpose. This category includes students, visitors, and foreign government officials. Documentation presented may include the Form I-94. Students with this status aren’t eligible for SFA aid.

• 10. This document appears valid and relates to an alien not authorized employment in the United States: This block is checked when an alien’s status prohibits employment in the United States. Students with this status aren’t eligible for SFA aid.

• 11. Continue to process as legal alien. INS is searching indices for further information. This block is checked if INS is withholding judgment, pending further investigation on the status or validity of documentation. This statement doesn’t imply that the applicant is an illegal alien or the holder of fraudulent documentation. Benefits shouldn’t be denied on the basis of this statement.
The student's documentation should be accepted at face value until INS sends final notification regarding immigration status. If the student appears to be an eligible noncitizen based upon the school's review of the documents, the school may pay the student any SFA funds for which he or she is eligible. If INS later notifies the school that the student's documentation isn't valid, the school must cancel further disbursements but isn't liable for the payments already made.

12. **This document is not valid because it appears to be...:** This is checked when the documentation presented has expired or when an item appears to be counterfeit or altered (there are checkboxes used to indicate which of these apply). Notify the student that unless corrective action is taken with INS, the case will be submitted to the Office of Inspector General (OIG). Additional communication with INS will allow any unfortunate mistakes in the status-verifier's review to be corrected. Until this discrepancy is resolved, no further aid may be disbursed, awarded, or certified. If the student does not take corrective action in a timely manner, the case must be reported to the OIG.

The INS will initial and stamp the front of the G-845S in the signature block.

The comments block on the back of the G-845S provides further instructions. The intended meaning of each of the following blocks that may be checked follows:

13. **No determination can be made from the information submitted.** Please obtain a copy of the original alien registration documentation and resubmit. This is normally checked when the school has failed to provide copies of any of the INS documents. The statement is often accompanied by a listing of acceptable forms of documentation. The school should resubmit the G-845S with copies of the original alien documentation.

14. **No determination can be made without seeing both sides of the document submitted.** Resubmit the G-845S with copies of both sides of each document.

15. **Copy of document is not readable.** Resubmit the G-845S with higher quality copies of the original alien documentation.

The comments listed under “Permanently Residing Under Color of Law” (PRUCOL) reflect information about aliens who have applied for special treatment (for example, by virtue of having life-threatening medical situations) that may cause the INS to refrain from seeking their expulsion. These blocks will be checked only if a request for evaluation for PRUCOL is made in Block 8 on the first page of the G-845S. Comments will rarely be made in this section because the school wouldn’t have asked for a PRUCOL evaluation when submitting the G-845S. However, in all cases, the INS should check other responses on
the form as well, and these other responses should be used to determine the student’s status.

**Student rights**

The student is permitted at least 30 days from the time the school receives the output document to provide documentation of his or her citizenship status. During this period and until the results of the Secondary Confirmation are received, a school can't deny, reduce, or terminate aid to a student. Disbursements can be made to an otherwise eligible student pending the INS response if at least 15 business days have passed since the date on which the documentation was submitted to the INS. (Of course, the general exclusions for inconsistent data being on file are applicable here.)

A school isn’t liable for an error in its determination that a student is an eligible noncitizen if, in making that determination, the school had no conflicting data on file and it relied on

- an output document indicating that the student meets the requirements for federal student aid,
- an INS determination of an eligible immigration status in response to a request for Secondary Confirmation, or
- immigration status documents submitted by the student, if the INS did not respond in a timely fashion.

The student (or parent for PLUS borrowers) is liable for any SFA funds received if he or she is ineligible. If the school made its determination without having one of these types of documents, the school is held responsible for repaying SFA funds to the Department.

The school should establish procedures to ensure that if SFA funds are disbursed and the school later determines (using Secondary Confirmation) that the student isn’t an eligible noncitizen, the student is provided with a notice of the determination, an opportunity to contest the determination, and notice of the school’s final determination. The student can contest the determination by submitting to the school all additional documents that the student believes support his or her claims to be an eligible noncitizen. If the documents appear to support the student’s claim, the school should submit them to INS using Secondary Confirmation. The school’s final determination would be based on the Secondary Confirmation results.

For every student required to undergo Secondary Confirmation, the school is required to furnish written instructions providing

- an explanation of the documentation the student must submit as evidence of eligible noncitizen status. (The “Summary Chart of Acceptable Documentation” found on page 51 is acceptable);
• the institutional deadline for submitting documentation (which must be at least 30 days from the date the school receives the results of the Primary Confirmation) and notification that if the student misses the deadline, he or she may not receive SFA funds for the award period or period of enrollment; and

• an acknowledgment that no determination of the student’s eligibility will be made until an opportunity to submit immigration status documents is provided.

CITIZENS OF THE FREELY ASSOCIATED STATES

The Compact of Free Association (P.L. 99-239) created three political entities from the former Trust Territory of the Pacific Islands. Two of these entities, the Marshall Islands and the Federated States of Micronesia, voted in 1986 to end political ties with the United States. The third entity, Palau, voted to ratify the compact in 1994; its independence was effective October 1, 1994. These three entities are the Freely Associated States. Citizens of the Freely Associated States are eligible for Pell Grants, FWS, and FSEOGs but are not eligible for loans.

Documenting Status

Students who are citizens of the Freely Associated States should answer the citizenship question on the FAFSA by indicating that they are eligible noncitizens and leave the item about the A-Number blank. (If the student doesn’t have an SSN, he or she can leave that item blank as well.) Because the student isn’t providing the A-Number, his or her application won’t go through the INS match. As long as the student’s file contains consistent information on his or her citizenship, the school isn’t required to collect documentation.

Citizens of the Freely Associated States who file through EDExpress may indicate that they are eligible noncitizens, after which their state of legal residence will be confirmed. If they are determined to be residents of the Freely Associated States, they won’t be required to provide an A-Number, and EDExpress won’t reject their applications.

DOCUMENTING CITIZENSHIP STATUS IN LATER AWARD YEARS

There are several cases in which the school must verify a student’s citizenship in a subsequent award year if that student again does not receive Primary Confirmation through the application process.

For example, a student who presented a Temporary Form I-551 in a prior award year should have received a permanent I-551 by the next year and shouldn’t still have a temporary card. The school should refer the student to INS to obtain a permanent I-551 or an updated endorsement on the previous card. The documents should also be submitted to INS on a G-845S.
The school must also document the eligible noncitizen status each award year for a conditional permanent resident, a refugee, a Cuban-Haitian entrant, or a person granted asylum. Students in any of these categories may have been adjusted to permanent-resident status or may have had their statuses revoked. The school will have to perform Secondary Confirmation if the student’s status isn’t confirmed through the INS match.

The school doesn’t have to perform Secondary Confirmation to document a student’s eligible noncitizen status in subsequent award years if the school previously documented that the student is a U.S. citizen or national, is a citizen of the Freely Associated States, or has a Form I-551 or I-151.

In addition, the school isn’t required to perform Secondary Confirmation if in a previous award year a school determined the student to be an eligible noncitizen through Secondary Confirmation and the documents used for that Secondary Confirmation haven’t expired. The school must also have no conflicting information or reason to doubt the student’s claim of having eligible noncitizen status. Also note that the school must have confirmed the status in a previous award year. (Although the school can disburse aid without the INS response if the INS doesn’t respond in time, the school can’t count that lack of response as confirmation for the following year.)

REPLACING LOST INS DOCUMENTS

If a student can’t locate his or her official INS documentation, the student must request that the documents be replaced because immigrants are required to have in their possession documentation verifying their statuses. Requests for replacement documents should be made to the INS District Office that issued the original documents.

The student will be asked to complete a Form I-90, “Application to Replace Alien Registration Card” or a Form I-102, “Application for Replacement/Initial Nonimmigrant Arrival-Departure Document.” PDF versions of these forms can be downloaded from the INS web site at <http://www.ins.usdoj.gov/forms/>. A temporary I-94 may be issued while the replacement documents are pending.

In cases of undue hardship, where the student urgently needs documentation of his or her status, the Freedom of Information (FOI) Act allows the student to obtain photocopies of the documents from the INS District Office that issued the original documents. The student can submit an INS Form G-639 to make this request or can simply send a letter to the district office. If the student is not sure which district office issued the original documents, he or she can submit the request to the FOI office in Washington, DC at

Freedom of Information
425 I Street, N.W.
Room 5304
Washington, D.C. 20536
## Summary Chart of Acceptable Documentation

As an alternative for a student who is having trouble obtaining replacement INS documents, the student may use a G-639 to request photocopies of the original documentation.

### Citizen Not Born in United States

<table>
<thead>
<tr>
<th>Documentation Type</th>
<th>Acceptable Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certificate of Citizenship</td>
<td>Must have student's name, certificate number, and the date the certificate was issued.</td>
</tr>
<tr>
<td>Certificate of Naturalization</td>
<td>Must have student's name, certificate number, Alien Registration Number, name of the court (and date) where naturalization occurred.</td>
</tr>
<tr>
<td>&quot;Certification of Birth Abroad&quot;</td>
<td>Must have embossed seal “United States of America” and “State Department.”</td>
</tr>
<tr>
<td>U.S. Passport</td>
<td></td>
</tr>
</tbody>
</table>

### Noncitizen National

<table>
<thead>
<tr>
<th>Documentation Type</th>
<th>Acceptable Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Passport</td>
<td>Must be stamped “Noncitizen National.”</td>
</tr>
</tbody>
</table>

### Permanent Resident

<table>
<thead>
<tr>
<th>Documentation Type</th>
<th>Acceptable Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Alien Registration Receipt Card” Form I-151, I-551, or I-551C</td>
<td>The I-551C must have a currently valid expiration date.</td>
</tr>
<tr>
<td>Passport</td>
<td>Must be stamped “Processed for I-551” with expiration date.</td>
</tr>
<tr>
<td>I-94</td>
<td>Must be stamped “Processed for I-551” with expiration date, or “Temporary Form I-551,” with appropriate information filled in.</td>
</tr>
</tbody>
</table>

### Other Eligible Citizen

<table>
<thead>
<tr>
<th>Documentation Type</th>
<th>Acceptable Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Arrival-Departure Record“ Form I-94</td>
<td>Must be stamped as a Refugee, Asylum Status, Conditional Entrant (before April 1, 1980), Parolee, Cuban-Haitian Entrant.</td>
</tr>
</tbody>
</table>
CITIZEN NOT BORN IN U.S./NONCITIZEN NATIONAL

U.S. Passport

Can be used to document citizenship for citizen born abroad.

For noncitizen national — must be stamped “Noncitizen National”

(Note that a passport issued by another country may be used to document permanent resident status, if it has the endorsement "Processed for I-551" and has a currently valid expiration date.)

Certificate of Citizenship

The Certificate of Citizenship is issued to persons who were born abroad of U.S. parent(s); who became citizens when their parents were naturalized; or who were adopted by U.S. parents.

Certification of Birth Abroad

Issued to U.S. citizens born abroad. Must have embossed seal of the State Department.
Certificate of Naturalization

The Certificate of Naturalization is issued to naturalized U.S. citizens.

A revised version of the Certificate of Naturalization is issued to citizens who file for naturalization after October 1, 1991.

PERMANENT RESIDENT/OTHER ELIGIBLE NONCITIZEN

I-94 Arrival-Departure Record

For permanent resident status—must be stamped “Processed for I-551” with expiration date, or “Temporary Form I-551,” with appropriate information filled in.

For other eligible noncitizens—must be stamped as Refugee, Asylum Status, Conditional Entrant (before April 1, 1980), Parolee, Cuban-Haitian Entrant.
Alien Registration Receipt Card I-151

Issued prior to June 1978 to permanent residents. No longer issued, but valid indefinitely. Often referred to as a “green card,” though it is not always green.

Alien Registration Receipt Card I-551
(Resident Alien Card)

Issued to permanent residents. The I-551 is a revised version of the I-151. Often referred to as a “green card,” though it is not always green.

The “Conditional Resident Alien Card” is an I-551 that is issued to conditional permanent residents such as alien spouses. This card is identified by a “C” on the front, and has an expiration date on the back.