Unusual Enrollment History

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ILASFAA Leaves of Change: Harvesting New Ideas

Agenda

• What is UEH?
• Student Examples
  – UEH Flag 2
  – UEH Flag 3
  – Academic Records
• Regaining Eligibility
**What is Unusual Enrollment History?**

“The UEH Flag is intended to address possible abuse in the Title IV student aid programs; specifically, when a student

- attends an institution long enough to receive a Title IV credit balance,
- leaves without completing the enrollment period,
- and then enrolls at another institution, repeating the pattern of remaining just long enough to collect a Title IV credit balance without earning any academic credit.”


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**UEH Flag on ISIR**

“The UEH Flag on the ISIR indicates whether the student has an unusual enrollment history with regard to the receipt of Federal Pell Grant and Federal Direct Loan funds.”

CPS will flag these students on their SAR/ISIR:

- **N** = No Comment Code = no action necessary
- **2** = Comment Code 359 = determine if the student “received a Pell Grant or Direct Loan at your school”
- **3** = Comment Code 360 = determine if the student “received academic credit at the schools attended”

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
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UEH Flag on ISIR

<table>
<thead>
<tr>
<th>Overpayments</th>
<th>Pell: N/A</th>
<th>TEACH: N/A</th>
<th>FAMS: N/A</th>
<th>FWSOS: N/A</th>
<th>Perkins: N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loan Flags</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Post Screening Reason:</td>
<td>Discharged Loan Flag: NONE</td>
<td>Fraud Loan Flag: N</td>
<td>Defaulted Loans: N</td>
<td>TEACH Loan: N</td>
<td>LEUR: 116,666</td>
</tr>
<tr>
<td></td>
<td>Repayment:</td>
<td>Discharged Loan Flag: NONE</td>
<td>Fraud Loan Flag: N</td>
<td>Defaulted Loans: N</td>
<td>TEACH Loan: N</td>
</tr>
<tr>
<td></td>
<td>Active Bankruptcy:</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>

N = No Comment Code = no action necessary

2 = Comment Code 359 = determine if the student “received a Pell Grant or Direct Loan at your school”

3 = Comment Code 360 = determine if the student “received academic credit at the schools attended”

UEH Flag

Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?

What is the Review Period?

The review period is “the four award years prior to the current award year”

Example: 2015-16 Award Year
Review period – 11-12, 12-13, 13-14, & 14-15
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UEH Flag 2

Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?

Yes

Do "you have reason to suspect that the student... remains enrolled just long enough to collect student aid funds before disappearing."

No

What would give you reason to suspect the student is enrolling just long enough collect student aid before disappearing?

NSLDS, COD, Internal School Records, Transcripts, other documentation provided by the student, and/or conversation with the student.

Academic Review:
Did the student earn "any academic credit at each of the previously attended institutions during the relevant award years"?

Yes

"no additional action is required"

No

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
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**COD Information**

### School A: 11-12 Award Year

<table>
<thead>
<tr>
<th>Eligibility Limit</th>
<th>Status</th>
<th>Enrollment Amount</th>
<th>Scheduled Amount</th>
<th>Award Amount</th>
<th>Aid Amount</th>
<th>Total Aid</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>100.0000%</td>
<td>N/A</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td></td>
</tr>
</tbody>
</table>

### School B: 12-13 Award Year

<table>
<thead>
<tr>
<th>Eligibility Limit</th>
<th>Status</th>
<th>Enrollment Amount</th>
<th>Scheduled Amount</th>
<th>Award Amount</th>
<th>Aid Amount</th>
<th>Total Aid</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>100.0000%</td>
<td>N/A</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td></td>
</tr>
</tbody>
</table>

### School C: 13-14 Award Year

<table>
<thead>
<tr>
<th>Eligibility Limit</th>
<th>Status</th>
<th>Enrollment Amount</th>
<th>Scheduled Amount</th>
<th>Award Amount</th>
<th>Aid Amount</th>
<th>Total Aid</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>100.0000%</td>
<td>N/A</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td></td>
</tr>
</tbody>
</table>

### School D: 14-15 Award Year

<table>
<thead>
<tr>
<th>Eligibility Limit</th>
<th>Status</th>
<th>Enrollment Amount</th>
<th>Scheduled Amount</th>
<th>Award Amount</th>
<th>Aid Amount</th>
<th>Total Aid</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>100.0000%</td>
<td>N/A</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td>$2,000.00</td>
<td></td>
</tr>
</tbody>
</table>

---

**UEH Flag 2**

**Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?**

- **Yes**: Do “you have reason to suspect that the student... remains enrolled just long enough to collect student aid funds before disappearing.”

- **No**: What type of academic records would you request from the student?

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*Any record which helps the institution determine if academic credit was earned in the award year. Examples: Official Transcript, Unofficial Transcript, Grade Report.*

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
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Student 1

11-12 12-13 13-14 14-15
Award Year Award Year Award Year Award Year

School D
School C
School B
School A

2015

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11-12 Award Year

Unofficial Transcript

Page 1 of 1

Term: 2012 Winter
11/19/12 - 4/1/13

Academic Program History

Program: Business Administration

School: School D

Term: 2012 Fall
11/19/12 - 12/16/12

Academic Program History

Program: Business Administration

School: School C

Term: 2012 Spring
1/16/13 - 5/21/13

Academic Program History

Program: Business Administration

School: School B

Term: 2012 Summer
6/9/13 - 8/15/13

Academic Program History

Program: Business Administration

School: School A

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12-13 Award Year

13-14 Award Year
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14-15 Award Year

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**QUICK SUMMARY**

**UEH Flag** 2

**Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?**  
**Yes**

**Do you have reason to suspect that the student remains enrolled just long enough to collect student aid funds before disappearing?**

**No additional action is required**

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**What is academic credit?**

When “the student completed any credit hours or clock hours.”  
www.collegesource.org

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Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
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College Source

Example 1

Grades and Symbols used in Calculation of Grade-Point Averages:
Prior to the Fall Semester 1996, plus and minus grades were not awarded.

<table>
<thead>
<tr>
<th>Grade</th>
<th>Grade Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>4.00</td>
</tr>
<tr>
<td>A+</td>
<td>4.33</td>
</tr>
<tr>
<td>A-</td>
<td>3.67</td>
</tr>
<tr>
<td>B</td>
<td>3.00</td>
</tr>
<tr>
<td>B+</td>
<td>3.33</td>
</tr>
<tr>
<td>B-</td>
<td>2.67</td>
</tr>
<tr>
<td>C</td>
<td>2.00</td>
</tr>
<tr>
<td>C+</td>
<td>2.33</td>
</tr>
<tr>
<td>C-</td>
<td>1.67</td>
</tr>
<tr>
<td>D</td>
<td>1.00</td>
</tr>
<tr>
<td>D+</td>
<td>1.33</td>
</tr>
<tr>
<td>D-</td>
<td>0.67</td>
</tr>
<tr>
<td>E</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Example 2

GRADING SYMBOLS

- A: Excellent
- B: Good
- C: Satisfactory (Undergraduate) Conditional (Graduate)
- D: Poor (Undergraduate) Not Satisfactory (Graduate)
- E: Failure (Used before 1978)
- F: Failure
- P: Pass (Only for Pass/Fail classes). Not calculated in GPA

2015

UEH Flag

Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?

- Yes
- No

Academic Review:

Did the student earn "any academic credit at each of the previously attended institutions during the relevant award years”

- Yes
- No

Do "you have reason to suspect that the student... remains enrolled just long enough to collect student aid funds before disappearing.”

"no additional action is required”

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
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## Student 2

### 11-12 & 13-14 Award Years

<table>
<thead>
<tr>
<th>Course</th>
<th>Description</th>
<th>Grade</th>
<th>Hours</th>
<th>Points</th>
<th>Course</th>
<th>Date</th>
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<tbody>
<tr>
<td>Fall Semester 2013</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COLL2300 College Algebra</td>
<td>A</td>
<td>3.00</td>
<td>12.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENG1314 Reading Improvement</td>
<td>C</td>
<td>3.00</td>
<td>4.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PHY1160 Phys &amp; the Univ</td>
<td>D</td>
<td>3.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SOC1250 Intro to Sociology</td>
<td>F</td>
<td>1.00</td>
<td>3.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Undergrad Attempt Points</td>
<td>Dividend 0.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Term</td>
<td>12.00 9.00 21.00 12.00 1.75</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cum Undergrad</td>
<td>12.00 9.00 18.00 3.00 1.67</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Academic Standing:</td>
<td>Academic Probation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spring Semester 2013</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DEV101 College Reading</td>
<td>B</td>
<td>3.00</td>
<td>3.00</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>ENG123 English Composition</td>
<td>C</td>
<td>3.00</td>
<td>4.00</td>
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<td></td>
<td></td>
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<tr>
<td>PHY1160 Intro to Social</td>
<td>A</td>
<td>3.00</td>
<td>3.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Undergrad Attempt Points</td>
<td>Dividend 0.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Term</td>
<td>12.00 9.00 12.00 3.00 1.75</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cum Undergrad</td>
<td>12.00 9.00 12.00 3.00 1.75</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Academic Probation</td>
<td>Student in Good Standing</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fall Semester 2013</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COM 1003 Tech Communication</td>
<td>F</td>
<td>3.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COM 1010 Salon Management</td>
<td>C</td>
<td>2.00</td>
<td>3.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COM 1012 Manicur &amp; Pedicure</td>
<td>D</td>
<td>2.00</td>
<td>3.00</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>COM 1030 Nail Theory</td>
<td>A</td>
<td>7.00</td>
<td>28.03</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Undergrad Attempt Points</td>
<td>Dividend 0.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Term</td>
<td>27.00 12.00 32.00 15.00 5.12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cum Undergrad</td>
<td>27.00 12.00 32.00 15.00 5.12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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**2015**
### 13-14 Award Year

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<table>
<thead>
<tr>
<th>SUBJECTS</th>
<th>TOTAL HOURS</th>
<th>Breakdown of Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shampooing of all kinds</td>
<td>50</td>
<td></td>
</tr>
<tr>
<td>Hair coloring, bleaches and rinses</td>
<td>160</td>
<td></td>
</tr>
<tr>
<td>Hair cutting and shaping</td>
<td>160</td>
<td></td>
</tr>
<tr>
<td>Permanent waving and straightening</td>
<td>160</td>
<td></td>
</tr>
<tr>
<td>Hair setting, pin curls, finger waves and thermal cutting</td>
<td>230</td>
<td></td>
</tr>
<tr>
<td>Combination and hairdressing techniques</td>
<td>110</td>
<td></td>
</tr>
<tr>
<td>Scalp treatments and scalp diseases</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>Facials, eyebrow and arched</td>
<td>78</td>
<td></td>
</tr>
<tr>
<td>Manicuring, hand and arm massage and treatment of nails</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>Cosmetics and shop management</td>
<td>50</td>
<td></td>
</tr>
<tr>
<td>Sanitation and sterilization</td>
<td>90</td>
<td></td>
</tr>
<tr>
<td>Anatomy</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>State Law</td>
<td>50</td>
<td></td>
</tr>
<tr>
<td>Misc. lectures and test review</td>
<td>150</td>
<td></td>
</tr>
</tbody>
</table>

### 14-15 Award Year

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<table>
<thead>
<tr>
<th>Name</th>
<th>Description</th>
<th>Exam Date</th>
<th>Grade</th>
<th>ComLab Lab</th>
<th>Total Lab</th>
<th>Grade</th>
</tr>
</thead>
<tbody>
<tr>
<td>56-11</td>
<td>Skin Care</td>
<td>1/22/2014</td>
<td>85.00</td>
<td>0.00</td>
<td>1.50</td>
<td>85.00</td>
</tr>
<tr>
<td>56-15</td>
<td>Hair Stylist</td>
<td>1/22/2014</td>
<td>90.00</td>
<td>0.00</td>
<td>1.50</td>
<td>90.00</td>
</tr>
<tr>
<td>56-12</td>
<td>Hair Stylist</td>
<td>1/22/2014</td>
<td>90.00</td>
<td>0.00</td>
<td>1.50</td>
<td>90.00</td>
</tr>
<tr>
<td>56-10</td>
<td>Cosmetology</td>
<td>1/22/2014</td>
<td>80.00</td>
<td>0.00</td>
<td>1.50</td>
<td>80.00</td>
</tr>
<tr>
<td>56-13</td>
<td>Cosmetology</td>
<td>1/22/2014</td>
<td>80.00</td>
<td>0.00</td>
<td>1.50</td>
<td>80.00</td>
</tr>
</tbody>
</table>

2015
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14-15 Award Year

| SCHEDULED FOR | MA | START DATE: | 11/24/14 | COURSE | MATH | A | PS: C |
| SCHEDULED FOR | MA | START DATE: | 11/24/14 | COURSE | INT73 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | INT35 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | INT24 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | INT12 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | INT12 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | CRG16 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | CRG16 | MATH | A | PS: A |
| SCHEDULED FOR | MA | START DATE: | 12/15/15 | COURSE | CRG16 | MATH | A | PS: A |

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**UEH Flag 2**
Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?

- Yes
- No

**UEH Flag 3**
Did the student earn "any academic credit at each of the previously attended institutions during the relevant award years"

- Yes
- No

Academic Review:
Did the student provide documentation that explains the reason for failure to earn academic credit other than enrolling "only to receive credit balance funds."

- Yes
- No

Do "you have reason to suspect that the student... remains enrolled just long enough to collect student aid funds before disappearing."

- Yes
- No

"no additional action is required"

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
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### Student 3

<table>
<thead>
<tr>
<th>Award Year</th>
<th>School D</th>
<th>School C</th>
<th>School B</th>
<th>School A</th>
</tr>
</thead>
<tbody>
<tr>
<td>11-12</td>
<td>x</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>12-13</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>13-14</td>
<td></td>
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</tr>
<tr>
<td>14-15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**2015**

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### 11-12 Award Year

<table>
<thead>
<tr>
<th>Subject Course Level Title</th>
<th>Grade</th>
<th>Credit Hours</th>
<th>Quality Start and End Dates</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>ECON 1110 US</td>
<td>B</td>
<td>3.00</td>
<td>A</td>
<td>3.00</td>
</tr>
<tr>
<td>ENGL 110F US</td>
<td>F</td>
<td>3.00</td>
<td>9.00</td>
<td>A</td>
</tr>
<tr>
<td>HISL 1114 US</td>
<td>C</td>
<td>3.00</td>
<td>A</td>
<td>3.00</td>
</tr>
<tr>
<td>MGMT 211A US</td>
<td>B</td>
<td>3.00</td>
<td>9.00</td>
<td>B</td>
</tr>
<tr>
<td>MATH 111E MS</td>
<td>D</td>
<td>3.00</td>
<td>1.00</td>
<td>D</td>
</tr>
</tbody>
</table>

**2015**

---

<table>
<thead>
<tr>
<th>Subject Course Level Title</th>
<th>Grade</th>
<th>Credit Hours</th>
<th>Quality Start and End Dates</th>
<th>Points</th>
</tr>
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ILASFAA Leaves of Change: Harvesting New Ideas

12-13 Award Year

Unofficial Transcript

<table>
<thead>
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<th>Course/Department and Title</th>
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<tr>
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2015

ILASFAA Leaves of Change: Harvesting New Ideas

13-14 Award Year

Unofficial Transcript

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<th>Subject Course Level Title</th>
<th>Grade</th>
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</tbody>
</table>

2015
I was attending school because I was told it would be an ideal fit for my career goals. Part way through it was obvious this wasn’t the right fit for me.

"to the maximum extent possible, obtain third party documentation to support the student’s claim."

While attending school I enlisted in the military where I was called to active duty the next day.

"to the maximum extent possible, obtain third party documentation to support the student’s claim."

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
**ILASFAA Leaves of Change: Harvesting New Ideas**

1. **UEH Flag 2**
   - Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period? **Yes**
   - Do you have reason to suspect that the student remains enrolled just long enough to collect student aid funds before disappearing? **No**

2. **UEH Flag 3**
   - Academic Review: Did the student earn "any academic credit at each of the previously attended institutions during the relevant award years"? **No**
   - Did the student provide documentation that explains the reason for failure to earn academic credit other than enrolling "only to receive credit balance funds."? **Yes**
   - "no additional action is required" **No**

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15

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**ILASFAA Leaves of Change: Harvesting New Ideas**

**Clearing the UEH Flag**

“If you approve the student’s continuing eligibility, you may choose to require the student to establish an academic plan, similar to the type of plan used to resolve SAP appeals. You may also wish to counsel the student about the Pell Lifetime Eligibility Used limitation and the impact of the student’s attendance pattern on future Pell Grant eligibility.”

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
ILASFAA Leaves of Change: Harvesting New Ideas

Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?

UEH Flag 2

No

Yes

Do “you have reason to suspect that the student... remains enrolled just long enough to collect student aid funds before disappearing.”

UEH Flag 3

Did the student provide documentation that explains the reason for failure to earn academic credit other than enrolling “only to receive credit balance funds.”

Academic Review: Did the student earn “any academic credit at each of the previously attended institutions during the relevant award years”

No

Yes

“no additional action is required”

“deny the student any additional title IV”

Denying/Regaining Eligibility

“successful completion of academic credit may be considered basis for renewing the student’s Title IV eligibility”

“for the Pell Grant... eligibility begins with the payment period in which the student met the eligibility requirements, while eligibility for Direct Loans is retroactive to the beginning of the enrollment period.”
### Regaining Eligibility

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>FULL LOANS</td>
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<tr>
<td>PELL DISB.</td>
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> X Credits; ≥ X GPA

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15

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### Regaining Eligibility

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<thead>
<tr>
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<tr>
<td>FULL LOANS</td>
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<td>PELL DISB.</td>
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</table>

> X Credits; ≥ X GPA

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
ILASFAA Leaves of Change: Harvesting New Ideas

**UEH Flag 2**
Did the student receive a Pell Grant or Loan Disbursement at your institution during the review period?
- Yes
- No

**IEH Flag 3**
Academic Review:
Did the student earn “any academic credit at each of the previously attended institutions during the relevant award years”
- Yes
- No

Did the student provide documentation that explains the reason for failure to earn academic credit other than enrolling “only to receive credit balance funds.”
- Yes
- No

Thank You!
and
Any Questions?

Quotes from 15-16 Student Aid Handbook & Dear Colleague Letters published 3/8/13 & 3/16/15
Getting the student’s financial aid history

There are several ways for you to get a student’s financial aid history from NSLDS. You can:

- use the NSLDS Financial Aid History section of the ISIR,
- log on to the NSLDS Professional Access website and access the data online for a student,
- for multiple students, use the FAT 001 Web report, which you submit from the Reports tab on the NSLDS site (you retrieve the results through the SAIG), or
- send a batch TSM/FAH Inform file to request aid history data for several students, which will be returned in either extract or report format through SAIG. The TSM/FAH processes and batch file layouts are posted on the IFAP website at the NSLDS reference materials link under Processing Resources.

NSLDS uses a postscreening process to let you know when there are significant changes (such as a defaulted loan or an overpayment) to a student’s financial aid history. If postscreening identifies changes that may affect the student’s eligibility, the CPS will generate new output documents so schools that are listed for receipt of the student’s FAFSA information will automatically be notified. Items that have changed since the last transaction are marked on the output document with a “#” sign, and the reason code for the postscreening will be given.

To help you identify when NSLDS data has changed, the document will include an NSLDS transaction number in the “FAA Information” section with the other match flags. This is the number of the last transaction on which NSLDS data changed, so if you receive an ISIR on which that number is higher than the one on the ISIR you used to determine the student’s eligibility, you must review the NSLDS data on the new ISIR to be sure there are no changes affecting the student’s eligibility (be aware of the new Pell LEU limits and codes; for more on Pell LEU, see Volume 3, Chapter 3). There will be postscreening codes (see The ISIR Guide for the list) to help determine what changed.

Unusual enrollment history

There is a flag in NSLDS for students whose pattern of enrollment and/or award history for either Pell or Direct Loans (other than a Direct Consolidation Loan or Parent PLUS Loan) is identified as unusual. The CPS will flag the Unusual Enrollment History field (UEH) on the student’s SAR/ISIR. A value of “N” requires no action, as it denotes no unusual history. A value of “2” or “3” in the UEH field requires review and resolution by your school (see below). Codes 2 and 3 do not necessarily mean the student has improperly received Pell or Direct Loan funds, but it is a sign of unusual activity, for example, receiving Pell and/or Direct Loans at multiple schools in the same semester, or receiving aid and then withdrawing before earning any credit.

To resolve a UEH flag of “2,” you must check the student’s enrollment and financial aid records to determine if, during the four award years prior to the current award year (i.e., 2011-12, 2012-13, 2013-14, and 2014-15), the student received a Pell Grant or Direct Loan at your school. If so, no further action is required unless you have reason to suspect that the student in question remains enrolled just long enough to collect student aid funds before disappearing. In such a case, you must follow the guidance below for UEH flag “3.”

To resolve a UEH flag of “3,” you must check the student’s academic records to determine if they received academic credit at the schools attended during the four award years prior to the current award year (i.e., 2011-12, 2012-13, 2013-14, and 2014-15). Using data from NSLDS, you must determine, for each prior attended institution for each student, whether academic credit was earned during the award year in which the student received Pell or Direct Loan funds. Academic credit is considered for this purpose to mean completing one or more clock-hour or credit-hour.

If the student did earn academic credit at all of the schools previously attended for a relevant award year, no further action is required unless you have reason to believe that the student has had a practice of enrolling just long
enough to receive credit balances before disappearing. In such cases, follow
the guidance below for cases when academic credit is not earned (next para-
graph).

When academic credit is not earned at a previously attended school,
and, if applicable, at your school, you must obtain documentation from the
student explaining why the student failed to earn academic credit. You must
determine whether the documentation provided supports: 1) the reasons de-
scribed by the student; and 2) that the student did not enroll only to receive
credit balance funds.

Acceptable reasons may include personal illness, a family emergency, a
change in where the student lives, and military obligations, or an academic
complication, such as unexpected academic challenges, or the student having
determined that the academic program in question did not meet their needs.
You should, to the maximum extent possible, obtain third party documenta-
tion to support the student’s claim.

In similar fashion to the exercise of professional judgment, you must
determine whether the circumstances of the failure of the student to receive
academic credit, as evidenced by the student’s academic records and docu-
mentation, support the continuation of title IV eligibility. If the student with
a UEH flag of 2 or 3 fails to provide compelling reasons and documentation
for a failure to receive academic credit for a period for which they received
Title IV funds, you must conclude that their eligibility is terminated. Your
determination is final and is not subject to appeal to the Department. You
must document and maintain a file of reason(s) for the decision for possible
review.

If you approve the student’s continuing eligibility, you may choose to
require the student to establish an academic plan, similar to the type of plan
used to resolve SAP appeals. You may also wish to counsel the student about
the Pell Lifetime Eligibility Used (LEU) limitation and the impact of the
student’s attendance pattern on future Pell Grant eligibility (see Volume 3,
Chapter 3 and DCL GEN-12-01 and GEN-12-18).

When a student’s eligibility is terminated in this way, you must provide
information to the student on how they may subsequently regain eligibility,
and the student must be given an opportunity to question and appeal the
decision to your school, consistent with the opportunities to question and
appeal similar determinations such as SAP and professional judgment deter-
minations.

Since the basis for denial is lack of academic performance, successful
completion of academic credit may be considered basis for renewing the
student’s Title IV eligibility, assuming they are in all other ways eligible for
the aid in question. This could include meeting the requirements of the plan
that you established with the student, although such a plan is not necessarily
required. When a student regains eligibility after losing it in this manner, the
student’s eligibility is retroactive to the beginning of the current period of en-
rollment, for Direct Loans, and for all other types of Title IV aid, retroactive
to the beginning of the current payment period.
March 8, 2013

GEN- 13-09

Subject: Students with an Unusual Enrollment History Flag --- “C” code on the ISIR

Summary: This guidance describes the Department’s efforts to prevent fraud and abuse in the Federal Pell Grant Program by identifying students with unusual enrollment histories, and describes how institutions must resolve the resulting ISIR ‘C’ codes for students with these enrollment histories.

Dear Colleague:

In recent communications (see below), we provided information on the addition of an Unusual Enrollment History Flag (UEH Flag) to the 2013-2014 Institutional Student Information Record (ISIR). The UEH Flag indicates whether the student has an unusual enrollment history with regard to the receipt of Federal Pell Grant (Pell Grant) funds and is intended to address possible fraud and abuse in the title IV student aid programs. The specific enrollment pattern we are concerned about is one where the student attends an institution long enough to receive title IV credit balance funds, leaves without completing the enrollment period, enrolls at another institution, and repeats the pattern of remaining just long enough to collect another title IV credit balance without having earned any academic credit.

Some students who have an unusual enrollment history have legitimate reasons for their enrollment at multiple institutions. However, such an enrollment history requires a review to determine whether there are valid reasons for the unusual enrollment history. Resolution of a UEH flag is separate and distinct from verification and is not related to the new Verification Tracking Groups IV and V described in Dear Colleague Letter (DCL) GEN-12-11; however, it is similar in that institutional action is required. This letter provides more detail on the UEH Flag and describes actions that an institution must take to resolve a UEH issue before the student can receive additional title IV, HEA program assistance.

**ISIR Unusual Enrollment History Flags**

The UEH Flag (2013-2014 ISIR Data Item #440) indicates whether the student has an unusual enrollment history with regard to the receipt of Federal Pell Grant funds. UEH Flag values of ‘2’ or ‘3’ generate a ‘C’ Code to indicate to institutions that the student’s records must be reviewed. For students, Student Aid Report (SAR) Comment Code 359 is included when the UEH Flag value is ‘2,’ and SAR Comment Code 360 is
included when the UEH Flag value is ‘3’. (See the Summary of Changes for the Application Processing System. 2013-2014 posted to Information for Financial Aid Professionals (IFAP) on November 8, 2012.)

In setting the UEH Flag value, we will review Pell Grant disbursement information for the past three award years for all 2013-2014 Free Application for Federal Student Aid (FAFSA) filers. After that review, the student is assigned a UEH Flag of ‘N,’ ‘2’ or ‘3’. Note that there is no UEH Flag value of ‘1.’

A UEH Flag value of ‘N’ indicates that there is no unusual enrollment history issue and, thus, no ‘C’ Code, no comments, and no action required by the institution. A UEH Flag with a value of ‘2’ or ‘3’ requires resolution by the institution, as discussed below.

A UEH Flag with a value of ‘2’ indicates an unusual enrollment history that requires review by the institution of the student’s enrollment records to determine if the institution must collect additional information about the student’s prior enrollment. An example of an enrollment pattern that would generate a UEH Flag value of ‘2’ would be when the student received Pell Grant funds at three institutions over two award years.

A UEH Flag with a value of ‘3’ indicates that the institution must review academic records for the student and, in some instances, must collect additional documentation from the student, as explained below. An example of an enrollment pattern that would generate a UEH Flag value of ‘3’ would be when the student received Pell Grant funds at three or more institutions in one award year.

**Resolving Unusual Enrollment History Flags**

An institution must take the following steps to resolve an ISIR-reported UEH Flag.

**UEH Flag value is ‘N’:** No action is necessary as the student’s enrollment pattern does not appear to be unusual.

**UEH Flag value is ‘2’:** The institution must review the student’s enrollment and financial aid records to determine if, during the three award year review period (Award Years 2010-2011, 2011-2012, and 2012-2013), the student received a Pell Grant at the institution that is performing the review.

- If so, no additional action is required unless the institution has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds. In this case, the institution must follow the guidance that is provided below for a UEH Flag of ‘3’.

- If not, the institution must follow the guidance provided below for a UEH Flag of ‘3’.
UEH Flag value is '3': The institution must review the student's academic records to determine if the student received academic credit at the institutions the student attended during the three award year period (Award Years 2010-2011, 2011-2012, and 2012-2013). Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell Grant funding over the past three award years (2010-2011, 2011-2012, and 2012-2013).

Based upon academic transcripts it may already possess, or by asking the student to provide academic transcripts or grade reports, the institution must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant funds. Academic credit is considered to have been earned if the academic records show that the student completed any credit hours or clock hours.

- **Academic Credit Earned:** If the institution determines that the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required unless the institution has other reasons to believe that the student is one who enrolls just to receive the credit balance. In such instances, the institution must require the student to provide additional information as discussed below under "Academic Credit Not Earned." If it is determined that academic credit was not earned at one or more of the previously attended institutions, the institution must follow the "Academic Credit Not Earned" guidance below.

- **Academic Credit Not Earned:** If the student did not earn academic credit at a previously attended institution and, if applicable, at the institution performing the review, the institution must obtain documentation from the student explaining why the student failed to earn academic credit. The institution must determine whether the documentation supports (1) the reasons given by the student for the student's failure to earn academic credit; and (2) that the student did not enroll only to receive credit balance funds.

In some cases, the student may present personal reasons to explain the failure to earn academic credit. These reasons could include illness, a family emergency, a change in where the student is living, and military obligations. The institution should, to the extent possible, obtain third party documentation to support the student's claim.

In other instances, the student may present academic reasons to explain the failure to earn academic credit. For example, the student might explain that the first enrollment was at an institution that presented unexpected academic challenges, or that the student determined, before completing any academic credit, that the academic program did not meet the student's needs. Again, the institution should, to the extent possible, obtain third party documentation to support the student's claim.
Much like the exercise of professional judgment, as provided by section 479A of the Higher Education Act (HEA), the financial aid administrator determines whether the circumstances of the failure of the student to receive academic credit, as evidenced by the student’s academic records and other documentation, support the continuation of title IV, HEA program assistance eligibility. Also, like professional judgment, these institutional determinations are final and not appealable to the Department, and the reasons for the decision must be documented and maintained for possible review.

Approval of Continued Eligibility

If the institution approves the student’s continued eligibility, the financial aid administrator may choose to require the student to establish an academic plan, similar to the type of plan used to resolve satisfactory academic progress (SAP) appeals as provided in the regulations at 34 CFR 668.34(c) and (d). The financial aid administrator may also wish to counsel the student about the Pell Grant duration of eligibility provisions [Lifetime Eligibility Used (LEU)] and the impact of the student’s attendance pattern on future Pell Grant eligibility as described in DCLs GEN-12-01 and GEN-12-18 and in the Electronic Announcement posted to IFAP on August 13, 2012.

Denial of Continued Eligibility

If a student did not earn academic credit at one or more of the relevant institutions and does not provide, to the financial aid administrator’s satisfaction, an acceptable explanation and documentation for each of those failures, the institution must deny the student any additional title IV, HEA program assistance. The student must be provided with an opportunity to question and appeal the decision, consistent with the opportunities to question and appeal similar financial aid determinations at the institution such as SAP determinations and professional judgment decisions.

Regaining Aid Eligibility

If the institution denies a student continued title IV, HEA program assistance under the circumstances described above, it must provide the student with information as to how the student may subsequently regain title IV, HEA program eligibility. Since the basis for the denial is the student’s academic performance, it is expected that successful completion of academic credit would form the basis for the student’s subsequent request for renewal of title IV, HEA program eligibility. This could include meeting the requirements of an academic plan that the institution established with the student. (See 34 CFR 668.34(c)(3)(iii)(B) and (c)(4), and 668.34(d)(2)(ii)(B) and (d)(3).)

If the student meets the institution’s standards to regain eligibility for title IV, HEA program assistance, that eligibility would be effective under the same provisions that apply when a student gains or regains eligibility under other student eligibility
requirements. That is, for the Pell Grant and campus-based aid programs, eligibility begins with the payment period in which the student met the eligibility requirements (following the payment period of ineligibility), while eligibility for Direct Loans is retroactive to the beginning of the enrollment period. (See page 1-17 of Volume One – Student Eligibility of the 2012-2013 Federal Student Aid Handbook.)

Authority

The authority for an institution to deny title IV, HEA program assistance under the circumstances described in this letter is section 484(a)(4)(A) of the Higher Education Act of 1965, as amended, which requires the student to sign a Statement of Educational Purpose. (See also 34 CFR 668.32(h)). By signing the Statement of Educational Purpose as part of the student’s submission of the FAFSA, the student certified that he or she would use the title IV, HEA program assistance received only to meet educational costs.

If you have questions about the guidance provided in the letter, please contact Federal Student Aid’s Research and Customer Care Center Staff. Staff is available Monday through Friday between the hours of 9:00 a.m. and 5:00 p.m. (Eastern Time) at 1-800-433-7327. After-hours calls will be accepted by an automated voice response system. Callers leaving their names and phone numbers will receive a return call the next business day. Alternatively, you may e-mail the Care Center at fsa.customer.support@ed.gov.

Sincerely,

David A. Bergeron
Acting Assistant Secretary

Earlier Communications on the Unusual Enrollment History Flag:

GEN-15-05

Subject: 2015-2016 Unusual Enrollment History Flag

Summary: This letter describes changes made in the selection of 2015-2016 FAFSA applicants for an Unusual Enrollment History Flag. It also provides information on institutional responsibilities to resolve such flags.

Dear Colleague:

In Dear Colleague Letter GEN-13-09, published on March 8, 2013, we provided information regarding the initiation of an Unusual Enrollment History Flag (UEH Flag), which first appeared on 2013-2014 Institutional Student Information Records (ISIRs). As noted in the March 8 letter, the UEH Flag is intended to address possible abuse in the Title IV student aid programs; specifically, when a student attends an institution long enough to receive a Title IV credit balance, leaves without completing the enrollment period, and then enrolls at another institution, repeating the pattern of remaining just long enough to collect a Title IV credit balance without earning any academic credit.

Dear Colleague Letter GEN-13-09 also provided guidance on institutional responsibilities to resolve ISIRs with UEH Flags. That institutional responsibility guidance remains applicable for the current 2014-2015 FAFSA processing year, except that the relevant years for resolution have been changed to include award years 2011-2012, 2012-2013, and 2013-2014. The guidance included in GEN-13-09 also remains applicable for the 2015-2016 FAFSA processing year.

Beginning with the 2015-2016 FAFSA processing year, selection of applicants for a UEH Flag has been expanded to consider:

1. An applicant’s prior receipt of, in addition to a Federal Pell Grant, a Federal Direct Loan (not including a Direct Consolidation Loan or parent PLUS Loan). Our analysis shows that including Federal Direct Loans does not substantially increase the number of FAFSA applicants who will be assigned a UEH Flag. Including Federal Direct Loans addresses the concern that students who may not be receiving a Federal Pell Grant may be receiving loans at multiple institutions over a relatively short period of time, and, therefore, should be subject to the same scrutiny.

This change addresses the concern that the review of three prior award years could result in a student not receiving a UEH Flag because of not enrolling for one year, even with a continuing unusual enrollment history. Therefore, institutions must consider all four award years when evaluating if the student completed any academic credit for which Pell or Federal Direct Loan funds were provided, or whether the student had a valid reason for not earning any credit.

There may be instances where an institution suspects that a student for whom the Department did not assign a UEH Flag may be one whose past enrollment suggests that the student’s prior academic history should be reviewed. In such instances, the institution may choose to treat the student as though the Department had assigned the student a UEH Flag with a value of ‘3.’

The institutional resolution guidance for UEH Flags that was provided in Dear Colleague Letter GEN-13-09 is applicable for both the 2014-2015 and 2015-2016 FAFSA processing years. For reference, we provide a summary of that guidance below but we urge institutions to review the full guidance provided in the earlier Dear Colleague Letter.

**ISIR Unusual Enrollment History Flags**

The UEH Flag on the ISIR indicates whether the student has an unusual enrollment history with regard to the receipt of Federal Pell Grant and Federal Direct Loan funds. UEH Flag values of ‘2’ or ‘3’ generate a ‘C’ Code to indicate to institutions that the student’s records must be reviewed.

**Resolving Unusual Enrollment History Flags**

An institution must take the following steps to resolve a UEH Flag.

**UEH Flag value is ‘2’:** The institution must review the student’s enrollment and financial aid records to determine if, during the four award year review period (award years 2011-2012, 2012-2013, 2013-2014, and 2014-2015), the student received a Pell Grant and/or Federal Direct Loan at the institution that is performing the review.

- If so, no additional action is required. However, if the institution has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds, the institution must follow the guidance that is provided below for a UEH Flag of ‘3.’

- If not, the institution must follow the guidance provided below for a UEH Flag of ‘3.’
UEH Flag value is ‘3’: The institution must review the student’s academic records to determine if the student received academic credit at the institutions the student attended during the four award year period (award years 2011-2012, 2012-2013, 2013-2014, and 2014-2015). Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell Grant and/or Federal Direct Loan funding over the past four award years (2011-2012, 2012-2013, 2013-2014, and 2014-2015).

Based upon academic transcripts the institution may already possess, or by asking the student to provide academic transcripts or grade reports, the institution must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant and/or Federal Direct Loan funds. Academic credit is considered to have been earned if the academic records show that the student completed any credit hours or clock hours.

- **Academic Credit Earned**: If the institution determines that the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required unless the institution has other reasons to believe that the student is one who enrolls just to receive the credit balance. In such instances, the institution must require the student to provide the additional information discussed below under “Academic Credit Not Earned.” If it is determined that academic credit was not earned at one or more of the previously attended institutions, the institution must follow the “Academic Credit Not Earned” guidance below.

- **Academic Credit Not Earned**: If the student did not earn academic credit at a previously attended institution and, if applicable, at the institution performing the review, the institution must obtain documentation from the student explaining why the student failed to earn academic credit. The institution must determine whether the documentation supports (1) the reasons given by the student for the student’s failure to earn academic credit; and (2) that the student did not enroll only to receive credit balance funds.

**Denial of Continued Eligibility**

If a student did not earn academic credit at one or more of the relevant institutions and does not provide, to the financial aid administrator’s satisfaction, an acceptable explanation and documentation for each of those failures, the institution must deny the student any additional Title IV, HEA program assistance. The student must be provided with an opportunity to question and appeal the decision. The institution must also provide the student with information regarding how the student may subsequently regain eligibility.
If you have questions about the guidance provided in the letter, please contact Federal Student Aid’s Research and Customer Care Center Staff. Staff is available Monday through Friday between the hours of 9:00 a.m. and 5:00 p.m. (Eastern Time) at 1-800-433-7327. After-hours calls will be accepted by an automated voice response system. Callers leaving their names and phone numbers will receive a return call the next business day. Alternatively, you may e-mail the Care Center at fsa.customer.support@ed.gov.

Sincerely,

Lynn B. Mahaffie
Deputy Assistant Secretary
for Policy, Planning, and Innovation