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Baltimore, Maryland

THE U.S. Department of
EDUCATION



Session 25

Resolving “C” Codes, Edits, and Rejects on Institutional Information Records (ISIRS)

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THE U.S. Department of
EDUCATION



What are “C” Codes?

The “C” code is generated by the CPS as an indicator, in addition to comment codes, and match flags, when FAA resolution is required on results from data matches.

ISIR Guide: 2002-03 Action Letter #4
Appendix B



Seven (7) CPS Data Matches

1. Selective Service – data match and registration
2. INS – Primary Verification and Secondary Confirmation
3. Social Security Administration – SSN, citizenship, and date of death verification
4. Veterans Affairs – veteran status



Seven (7) CPS Data Matches - continued -

5. NSLDS – default, overpayment, and financial aid history
6. Department of Justice – drug abuse hold file
7. Social Security Administration – prisoner match



Selective Service “C” Codes

- Comment 30: Applicant not in Selective Service database
and
- Comment 33/57: Registration not conducted because out of age range or missing information
 - Submit correction with missing information to CPS.
 - Register with Selective Service.
 - Present appropriate confirmation of registration.
 - Qualify for a waiver for exemption.



INS Primary Verification “C” codes

- Comment 144 – INS did not confirm eligible non-citizen claim.
 - Wait for results from automated/CPS secondary confirmation. Not eligible until otherwise notified.

- Comment 141 – Match not conducted. Applicant changed response to citizenship question or ARN.
 - Determine reason for change and resolve any conflict.



INS Primary Verification “C” codes

- Comment 142 - Match not conducted. Invalid or missing ARN.
 - Submit corrections to CPS so match can be conducted.
- Possible upcoming change at INS:
 - Refugees and Asylees currently fail Primary Verification and are forced through Secondary Confirmation. If it is established that all asylees/refugees always pass Secondary Confirmation, INS will authorize them at Primary Verification and avoid Secondary Confirmation process.



INS Secondary Confirmation “C” Codes

- Comment 105 – in continuance at INS
 - Wait ten business days for another ISIR with updated status. If no response, conduct paper (G-845S) process.
- Comment 46 – INS did not confirm eligibility.
 - Begin paper (G-845S) process.
- Comment 109 – INS needs additional information
 - Begin paper (G-845S) process.



INS Secondary Confirmation “C” Codes

- INS not appropriately flagging some applicants:
 - Employment restricted non-citizens are not eligible for student aid unless the student can provide other INS documentation that can confirm the applicant’s eligibility. These applicants were not flagged by automated INS Secondary Confirmation and therefore reported as eligible.
 - Paper (G-845S) process with accompanying documentation is needed.
 - Fix was made at INS on February 28, 2002
 - We expect that there will be a small number of applicants reprocessed.
 - Problem discovered as result of your calls and questions.
THANK YOU.



SSA – SSN Verification “C” Codes

- Comment 60/63 – Date of Birth inconsistent with SSA records
 - Submit date of birth correction to CPS. If already correct, collect documentation that explains discrepancy and suggest that applicant resolve with SSA.
- Comment 61/64 – Name inconsistent with SSA records
 - Submit name correction to CPS. If already correct, collect documentation that explains discrepancy and suggest that applicant resolve with SSA.

SSA – Citizenship “C” Code

When applicant indicates U.S. Citizen on FAFSA

- Comment 146 – SSA did not confirm Citizenship status
 - Collect documentation that proves citizenship
 - U.S. Citizens born abroad, usually to military, State Department or Foreign Service parents generally have a valid birth certificate. SSA does not automatically update their database with this information.
 - If eligible non-citizen, submit correction to CPS with appropriate status and ARN.



Veterans Affairs Veteran Status “C” Codes

- Comment 162 – VA did not confirm Veteran status, so CPS assumes Dependent status
 - Parent information, including signature is needed to process ISIR.
 - Student may need VA to update their records then submit correction to CPS reaffirming VA status.
 - Collect documentation (DD214) showing Character of Service is other than dishonorable and conduct dependency override.



Veterans Affairs Veteran Status “C” Codes

- Comment 173 – VA did not find applicant in database, so CPS assumes Dependent status
 - Parent information, including signature is needed to process ISIR.
 - Student may need VA to update their records then submit correction to CPS reaffirming VA status.
 - Collect documentation (DD214) showing Character of Service is other than dishonorable and conduct dependency override.



Veterans Affairs Veteran Status “C” Codes

- Comment 180 – VA indicated that applicant is in active duty
 - Collect documentation showing applicant will be released by June 30, 2003.



NSLDS “C” Codes

- Comment 138 – SSN match, but name and DOB did not match
 - Access NSLDS on line to determine if NSLDS data is for the applicant. If so, determine student aid eligibility based on NSLDS data.
 - If not, award process can continue while appropriate data provider updates NSLDS.
 - NSLDS Customer Support is available for help: 1-800-999-8219.



NSLDS “C” Codes

- Comment 132 – Applicant has at least one loan in default.
 - Applicant needs to contact the holder(s) of the loan(s) to make satisfactory arrangements to repay. Appropriate contacts are indicated in ISIR comment text/codes.
 - Collect documentation of satisfactory repayment arrangements.
 - If loan is already repaid, collect documentation showing pay off information.



NSLDS “C” Codes

- Comment 133 – Applicant owes at least one Pell, FSEOG or Perkins Overpayment
 - FAA must contact the school associated with the overpayment.
 - The FAA may have to access NSLDS for additional information.
 - If held by Department of Education (ED), applicant must contact ED for guidance on how to resolve.



NSLDS “C” Codes

- Comment 134 – Applicant has at least one loan in Default and owes at least one Pell, FSEOG or Perkins Overpayment
 - Loan holder information and School codes are provided on ISIR comments or NSLDS Aid History page.
 - See guidance for comments 132 and 133



NSLDS “C” Codes

- Comment 115 – Applicant has at least one loan discharged due to disability
 - Eligibility requirements vary depending on when the discharge was granted and (for discharges on or after July 1, 2001) when the borrower requests the new loan.
 - Applicant may still be eligible for Pell and FSEOG. Requirements are for Perkins, FFEL, and Direct Loans.
 - See attached information sheet for more information.



NSLDS “C” Codes

- Comment 116 – Applicant has at least one loan in Active Bankruptcy
 - If the loan is defaulted, borrower must provide FAA with documentation from the holder stating that the debt is dischargeable.
 - If the loan was not defaulted, documentation is not required.
 - See Volume 1, Chapter 3 of the 2001-2002 SFA Handbook, page 1-55 for details.



NSLDS “C” Codes

- Comment 254, 255 – Subsidized Loan Total
OR
- Comments 260, 261, 266, 267 - Combined Loan Total
 - has exceeded loan limits based on dependency status and grade level.
 - Borrower must repay the amount borrowed in excess or make repayment arrangements satisfactory to the holder of the loan.
 - See Section 668.35(b)(1) of the Federal Student Financial Aid Regulations and Dear Colleague Letter GEN 96-13, Q&A #17 for additional information.



Department of Justice Drug Abuse Hold

- No “C” Code with comment 009.
- Reject 19 is generated.
- May be resolved only by ED in conjunction with Department of Justice.
- Contact ED @ (202)377-3243.



SSA - Prisoner Match “C” Codes

- Not Currently Operational
 - Refer to electronic announcement posted to IFAP on August 21, 2001

- Comment 81 - Applicant incarcerated in Local facility

OR

- Comment 83 - Applicant incarcerated in State or Federal facility
 - The student can self-certify to the FAA within 30 days that he or she is not incarcerated.



“C” Codes in exception to Data Matches

FAFSA Drug Question 35

- Comment 53 - Applicant left response blank
 - Not eligible. Submit correction to provide response to CPS.
- Comment 54 - Applicant reported a drug conviction that affects part year eligibility.
 - Not eligible until ineligibility period expires between July 1, 2002 and June 30, 2003
 - If response is incorrect, submit correction to CPS.



“C” Codes in exception to Data Matches

FAFSA Drug Question 35

- Comment 56/58 - Applicant reported a drug conviction, or doesn't know
 - Not eligible unless applicant completes an acceptable drug rehabilitation program:
 - program that includes at least two unannounced drug tests, and
 - receives, received or qualifies to receive funds from a federal, state or local government program;
 - is recognized by a federal, state or local government program;
 - receives, received or qualifies to receive payment from a federal or state licensed hospital, health clinic or medical doctor.
 - If response in incorrect, submit correction to CPS.



What are CPS Edits?

- The CPS applies a series of “compute edits” to application information to check for inconsistencies, contradictions and missing data.
- Compute edits also enable comments, highlights, rejects, match flags and other processing flags (such as Dependency Override requests and Verification Selection) to be provided on the ISIR and other output records.



Types of CPS Edits

- Warning Edits - When data is questionable or contradicting, the CPS generates only highlights (questions and responses provided in boldface print) and comments.
 - both the student and FAA need to pay careful attention to items that are highlighted.
- Reject Edits - When there is significant conflict, especially with key financial information, and a logical assumption can not be made, the CPS will reject the application.
 - An EFC is not calculated.
 - Highlights and comments are also provided.



Types of CPS Edits

- Assumption Edits - CPS assumes a response is something else, more logical (especially when it is left blank), based on comparison with other responses provided by the applicant.
 - Otherwise, the application would often be rejected.
 - Assumed values are used in calculating the EFC.
 - Data is identified as assumed and both the student and the FAA need to pay careful attention to them.



Troubles with CPS Edits?

- CPS Edits are most visible to FAAs in Assumptions and Rejects
 - These can be alleviated with Assumption and Reject Overrides we've put in place.
 - Verifiable Rejects are also available.
 - ED does not/can not always address FAA concerns.

CONTACT US.



What are CPS Rejects Codes?

- Alpha reject codes indicate reject reasons that are verifiable - that is, the student can verify the questionable data by re-entering the same value, or can correct it to a different value.
- Number reject codes are not verifiable - the questioned data must be changed or provided.
- Questioned information is highlighted and an EFC is not calculated.



Verifiable (Alpha) Reject Codes

Reject Code	Comment Code	Reject Reason
A	69	DOB year equals 1900 through 1917 Resolution: Verify or correct the Date of Birth.
B	72	Independent, DOB = or > 9/1/86, DOB \neq or > current year, and not early analysis Resolution: Verify or correct the Date of Birth



Verifiable (Alpha) Reject Codes

Reject Code	Comment Code	Reject Reason
C	111 114	Taxes paid equal to AGI
Resolution: Verify or correct Taxes paid.		
N	80	Either first name or last name blank
Resolution: Verify or correct Last Name or First Name.		



Verifiable (Alpha) Reject Codes

Reject Code	Comment Code	Reject Reason
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P	23	SSN not within valid SSA range
Resolution: Verify or correct the student's current SSN.		

W	178 179	Number of family members 15 or greater
Resolution: If Dependent, verify or correct Parents' Number of Family Members. If Independent, verify or correct Student's Number of Family Members.		



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
1	150 151	SNT not met & supplemental data blank

Resolution: If **Dependent**, provide: Parents' Cash, savings, and Checking; Parents' Real Estate/Investment Net Worth and Parents' Business/Investment Farm Net Worth. If **independent**, provide: Student's Cash, Savings and Checking; Student's Real Estate/Investment Net Worth and Student's Business/Investment Farm Net Worth.



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
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2	129 130	Incomplete application or renewal application
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Resolution: If Dependent, provide Parents' Taxed and
Untaxed Income. If Independent, provide Student and
Spouse (if married) Taxed and Untaxed Income

5	18	DOB blank or invalid
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Resolution: Correct the Date of Birth



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
8	145	SSN match w/ Date of Death
Resolution: Contact SSA. The SSN on the transaction belongs to a deceased person, according to SSA.		
10	168 169	Marital status & # in family is blank
Resolution: If Dependent, review & correct Parents' Marital Status & Number of Family Members. If Independent, review & correct Student's Marital Status Number of Family Members.		



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
11	89 99	Not married, two earnings reported

Resolution: If **Dependent**, review and correct Parents' Marital Status plus Father's/Stepfather's Income From Work and Mother's/Stepmother's Income From Work. If **Independent**, review and correct Student's Marital Status plus Student's Income Earned From Work and Spouse's Income Earned From Work.



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
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13	82	First & last name blank
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Resolution: Provide Student's Last Name and/or Student's First Name; or verify a blank first or last name if the student actually has only one name.

14	160	No student signature on paper application or SAR
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Resolution: Submit Signature correction on a printed SAR or may be corrected electronically.



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
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15	108	No parent signature
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Resolution: Submit Signature correction on a printed SAR or may be corrected electronically.

16	110	No student signature on FAFSA Express/Web transaction
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Resolution: Submit Signature correction on a printed SAR or may be corrected electronically.



Non-Verifiable (Numeric) Reject Codes

Reject Code	Comment Code	Reject Reason
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17	68	Citizenship blank or No
Resolution: Review or correct Citizenship Status.		

18	24, 62	SSN not on SSA database
Resolution: Correct the SSN or contact the SSA to update their database.		

19	9	Student on drug abuse hold
Resolution: Call (202)377-3243.		



Reference Phone Numbers for Eligibility Questions

SFAP Call Center: 1-800-433-7327

NSLDS for FAAs: 1-800-999-8219

CPS Customer Service: 1-800-474-7268



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We appreciate your feedback and comments. We can be reached:

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