



Tip Sheet for Financial Aid Administrators Working with Refugee and Asylee Students



Refugee and asylee students face unique challenges in their quests to obtain postsecondary education. This tip sheet is designed to help financial aid administrators working with this population with some of the questions they may have processing financial aid for these students.

Question	Answer
1. Are refugee and asylee students eligible for federal financial aid?	<p>Yes. Students whose documentation supports refugee or asylee status are eligible for Title IV aid. The following noncitizen statuses also are eligible:</p> <ul style="list-style-type: none">• Lawful permanent resident;• Conditional resident;• Parolee (i.e., “Parolee-Indefinite” or “Parolee-Expires”);• Cuban-Haitian entrant;• Victim of human trafficking (T-visa);• Battered or abused spouse or children-qualified noncitizen; and• American Indian born in Canada (i.e., Jay Treaty student). <p>The Federal Student Aid Handbook provides guidance on verifying eligibility and the documentation requirements for each noncitizen category.</p>
2. If a refugee or asylee student has the correct I-94 status but the card is expired, can I still use the card for proof of status?	<p>Yes. The expiration date shown on an I-94 is the Office of Management and Business (OMB) form expiration date. All government forms have OMB expiration dates, but this date is NOT the expiration of the traveler’s status. For refugee students specifically, refugee status does not expire unless revoked by the Department of Homeland Security (DHS). Refugee status continues even after the individual applies for and is granted Lawful Permanent Residency (LPR). For asylee students, asylum status does not expire unless revoked by DHS or until permanent resident status is granted.</p>
3. A refugee or asylee student originally stated on the Free Application for Federal Student Aid (FAFSA®) that they completed a bachelor’s degree but changed the answer after finding out they would not receive a Federal Pell Grant. What can I do to check the validity of this statement?	<p>A bachelor’s degree is a bachelor’s degree no matter where it was earned. First check within the institution’s records for documentation that would resolve the conflicting information. Ensure the student understands the question and explain the penalties for misrepresentation and the potential for having to repay all Title IV aid received if the answer is not correct.</p> <p>To resolve the conflict, the student must provide written documentation demonstrating that the foreign credential is not the equivalent of a bachelor’s degree. This could include an evaluation of the postsecondary transcript from an evaluation service, or other documentation as requested by the school.</p>

Question	Answer
4. A refugee or asylee student has supplied us with a high school diploma that is not in English. What can I do to verify its validity?	If your institution does not have the expertise to make the translation, it may consider using a foreign diploma evaluation service, consulting with a larger school in the area, or seeking the assistance of an association such as the National Association for College Admission Counseling (NACAC). Institutions cannot require students to provide translated versions of foreign diplomas or transcripts unless the school requires translated diplomas or transcripts from all students with foreign diplomas as part of its admissions policy.
5. A refugee or asylee student indicated on the FAFSA that they have a diploma from a foreign country, but they are unable to provide a copy of the diploma or a transcript. Can we accept alternative documentation?	<p>An institution can accept the student's self-certification of high school completion (including foreign high school completion) as indicated on the FAFSA. No further action is necessary regarding the student's completion of high school or its equivalent unless:</p> <ul style="list-style-type: none"> • It is the school's policy to require documentation of high school completion; or • The institution has information which conflicts with the information the student reported on the FAFSA. <p>A refugee or asylee student who indicates they are not able to provide documentation of high school completion may provide proof of their current or prior status as a refugee or asylee who entered the U.S. after the age of 15, along with proof of their attempt to obtain documentation, such as copies of correspondence requesting proof of high school completion (e.g., email or letter with proof of mailing), and a signed and dated statement from the applicant indicating that they completed secondary school in a foreign country, the name and address of the foreign high school, and the date when the diploma was awarded</p>
6. When do I submit the student's documentation of refugee or asylee status to the Systematic Alien Verification for Entitlement (DHS-SAVE) system?	<p>Schools must complete third-step verification via the DHS-SAVE system when the student's:</p> <ul style="list-style-type: none"> • Documentation supports their claim of eligible noncitizen status, but the student's status was not confirmed by the DHS primary match; or • Status was confirmed but the school has conflicting information. <p>Refer to the <i>SAVE System Instructions for U.S. Department of Education (School) Users</i> guide (found on the U.S. Department of Education's (ED's) DHS-SAVE, Eligible Noncitizens topics page under "Additional Resources") for complete instructions on the third-step verification process.</p>

Question	Answer
<p>7. What are some common forms of documentation for refugee students and students granted asylum?</p>	<p>Refugee students may have the following documentation:</p> <ul style="list-style-type: none"> • I-94 with “RE” as the Class of Admission and “DS” as the admit until date; • Refugee travel letter showing admission under Section 207 of the Immigration and Nationality Act (INA); • Refugee Travel Document (Form I-571); or • U.S. Travel document annotated with “Refugee Travel Document Form I-571 (Rev. Month-Day-Year).” <p>A student granted asylum also may have a Refugee Travel Document, but may also have an:</p> <ul style="list-style-type: none"> • I-94 or I-94A with “Section 208 of the Immigration and Nationality Act (INA)” as the Class of Admission; or • Employment Authorization Document (Form I-766) with the “A05” category. <p>Refer to Volume 1, Chapter 2 of the <i>FSA Handbook</i> for further information, including photographic samples of immigration documentation.</p>
<p>8. I submitted a third-step verification request and I am waiting for a response. Can I award aid in the meantime?</p>	<p>The process for third-step verification can take several weeks. It is up to the discretion of the financial aid administrator to decide whether to package aid while waiting for confirmation. If a United States Citizenship and Immigration Services (USCIS) response is not received after 15 business days and the school has no information that conflicts with the student’s documents or claimed status, the school must make a determination concerning the student’s eligibility, document in the student’s file that SAVE exceeded the response time, and disburse aid.</p>
<p>9. What if I receive a SAVE system response after 15 business days and I have already disbursed aid?</p>	<p>If third-step verification returns an eligible status, retain a copy of the SAVE response screen in the student’s file. If SAVE indicates a discrepancy, ask the student to correct the discrepancy with USCIS. No further certification of loans or aid disbursements can be made until the discrepancy is corrected. If the discrepancy is not reconciled, the student must repay all Title IV aid except wages earned through Federal Work-Study (FWS).</p> <p>Schools are not liable for aid disbursed after 15 business days and before receiving the USCIS response, provided there was no conflicting information, and the school followed the guidance regarding discrepancies.</p>
<p>10. What are the differences related to financial aid that I should be aware of between refugees and asylees (or other eligible noncitizen students) and Deferred Action for Childhood Arrival (DACA) students?</p>	<p>Eligible noncitizens are potentially eligible for all the same federal student aid programs that U.S. citizens are. DACA students are undocumented and therefore unable to receive federal student aid. They can, however, receive state or institutional aid depending on each state or institution’s rules. See NASFAA’s Tip Sheet for Undocumented Students for more questions and answers.</p>