



# NASFAA's Annual Training SAR Comment Codes 2017–18



## NASFAA ANNUAL STATE & REGIONAL TRAINING MATERIALS



The following is a presentation prepared for:  
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National Association of Student  
Financial Aid Administrators

# SAR Comment Codes 2017–18

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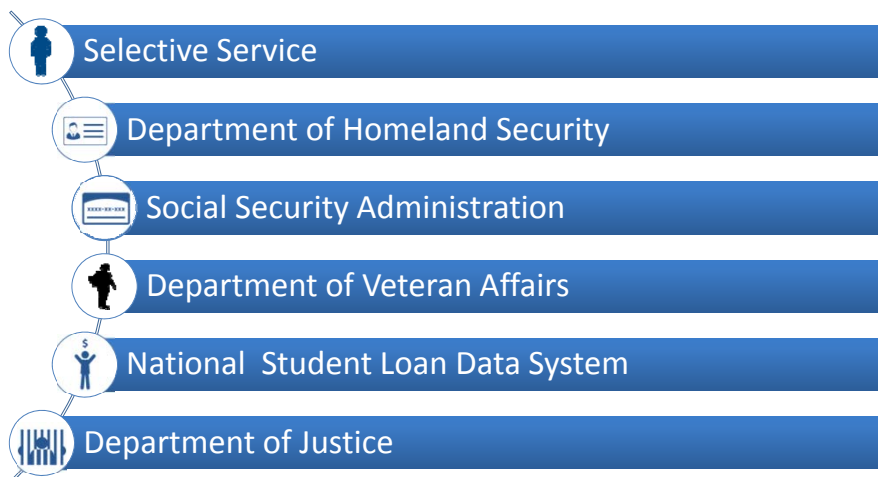


# NASFAA's Annual Training SAR Comment Codes 2017–18

## Training Goals

- Examine common database match SAR comment codes that schools encounter
- Discuss the basis for the SAR comment code
- Review options a school must use to resolve a SAR comment code that impact student eligibility for Title IV aid

## Database Matches





# NASFAA's Annual Training SAR Comment Codes 2017–18

## Selective Service

## Selective Service

- Registration requirement for all males between the ages of 18 and 25
- Selective Service confirms the registration completion for all FAFSA applicants who indicate they are a male
- Until the age of 25, registration can be completed via the FAFSA or Selective Service website



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 030

- The applicant is not in the database
- Selective Service Match Flag = N
- Student action:
  - Register with Selective Service, or
  - Provide the school with confirmation that he has registered, or
  - Provide documentation that he qualifies for an exemption or waiver
- School action:
  - Assist the student in fulfilling the requirement
  - If student is a noncitizen, determine if student would be exempt

### SAR Comment Code 033

- The student's name could not be sent to Selective Service for the following reason(s):
  - Insufficient information
  - Student is too old to register
  - FAFSA was not signed
- Selective Service Match Flag = blank



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 033

- Student action
  - If within age range, correct the FAFSA and submit it for processing
  - If older than 26, obtain registration status documentation from Selective Service
- School action
  - If student is within the age range, help the student make FAFSA corrections and submit for processing
  - If student older than 26, determine if student is exempt from registering or eligible for waiver

### SAR Comment Code 057

- The student did not indicate that he is male on the FAFSA and registration for Selective Service was not conducted
- Selective Service Registration Flag = N
- Student action
  - Correct FAFSA question #21 and submit it for processing



# NASFAA's Annual Training SAR Comment Codes 2017-18

## Exemptions

Under 18 years  
of age

Born before 1960

Currently in the  
armed services and  
on active duty

Citizens of the  
Republic of Palau,  
the Republic of the  
Marshall Islands, or  
the Federated States  
of Micronesia

Noncitizens - under  
certain conditions

Unable to register  
under certain  
conditions

Enrolled in specific  
officer procurement  
programs

Commissioned officer  
of Public Health  
Service on active  
duty or member on  
specified active duty

Transgender males  
who were assigned  
the sex of female  
at birth

Department of Homeland  
Security



# NASFAA's Annual Training SAR Comment Codes 2017–18

## Department of Homeland Security (DHS)

- Verifies student's citizenship status and eligible noncitizen status through primary confirmation (sometimes called primary verification and automated confirmation processes)

## Citizenship Status

Applies as “eligible noncitizen”

Alien Registration Number required

DHS primary confirmation

DHS secondary confirmation

Manual secondary confirmation



# NASFAA's Annual Training SAR Comment Codes 2017–18

## Citizenship Status

### Manual secondary confirmation for eligible noncitizens

Status documented within 30 days

- School may accept images

Submit Form G-485 within 10 business days

- Verification of valid documentation only
- If no response within 15 business days, school makes determination

Required in subsequent years only if document expires or status is conditional

## SAR Comment Code 046

- Student's eligibility for Title IV as a noncitizen has not been confirmed by DHS
- DHS Secondary Confirmation Match Flag = N
- School action
  - Verify the Alien Registration Number (ARN) matches the student's eligible noncitizen documentation





## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 105

- Student's eligibility for Title IV as a noncitizen has not been confirmed by the DHS
- DHS Secondary Confirmation Match Flag = C
- School action
  - Wait 10 business days for another ISIR with updated Secondary Confirmation match flag before beginning the G-845 process

### SAR Comment Code 109

- Student's eligibility for Title IV as a noncitizen has not been confirmed by the DHS because additional information needed
- DHS Secondary Confirmation Match Flag = X
- School action
  - Verify the ARN matches the student's eligible noncitizen documentation



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 141

- Student has changed either his or her citizenship response or the DHS verified ARN
- DHS Secondary Confirmation Match Flag = X
- School action
  - Verify the ARN matches the student's eligible noncitizen documentation

### SAR Comment Code 142

- Student's eligibility for Title IV as a noncitizen was not conducted because ARN was not provided or is invalid
- DHS Secondary Confirmation Match Flag = Blank
- School action
  - Help student add or correct the ARN or make other corrections and resubmit SAR/ISIR for processing



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 144

- Student's eligibility for Title IV as a noncitizen has not been confirmed by the DHS. DHS will continue reviewing its records and will provide notification when more information is received.
- DHS Secondary Confirmation Match Flag = N
- School action
  - Verify the ARN matches the student's eligible noncitizen documentation

Social Security Administration



## NASFAA's Annual Training SAR Comment Codes 2017–18

### Social Security Administration (SSA)

- Verifies the student's claim of U.S. citizenship or national status
- Verifies student's and parent's (if the student is dependent) Social Security Numbers (SSNs) are correct and the SSN corresponds to the individual's name and date of birth
- Checks whether student's and parent's (if the student is dependent) SSN belongs to a deceased person or is associated with a date of death

### SAR Comment Code 063

- The date of birth reported on the FAFSA does not match SSA records for the student's and/or parent's SSN
  - Student may have reaffirmed this information but the outcome did not change
- SSN Match Flag = 2
- Student action
  - Provide proof of date of birth to school



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 064

- The name reported on the FAFSA does not match SSA records for the student's and/or parent's SSN
- SSN Match Flag = 3
- Student action
  - Review information for accuracy
  - Contact SSA to update database
  - Provide documentation to school explaining the name discrepancy

### SAR Comment Code 146

- SSA did not confirm the student is a U.S. citizen
- SSA Match Flag = B, C, D, E, F, or \*
- Student action
  - Provide citizenship documentation to the school
- School action
  - Review provided documentation and update FAFSA



# NASFAA's Annual Training SAR Comment Codes 2017–18

## Veterans Administration

## Veteran for Title IV Purposes?

- An individual who has engaged in active duty
- A National Guard or Reserve enlistee who was called to active duty for other than state or training purposes
- A cadet or midshipman at one of the service academies
- An individual who will be a veteran by June 30, 2018
- An individual who was released under a condition other than dishonorable



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 162

- Student reported on FAFSA that he or she is a qualifying veteran and the VA did not confirm this.
- Only reason student is independent
- VA Match Flag = 2
- Student action
  - Provide DD214
  - Contact VA to have records updated
  - If not a qualifying veteran, must provide parental information

### SAR Comment Code 173

- Student reported on FAFSA that he or she is a qualifying veteran and the VA did not confirm this.
- Only reason student is independent
- VA Match Flag = 3
- Student action
  - Provide DD214
  - Contact VA to have records updated
  - If not a qualifying veteran, must provide parental information



# NASFAA's Annual Training SAR Comment Codes 2017-18

## DD214 Samples

DD214 Example – Acceptable

DD214 Example – Unacceptable



## SAR Comment Code 180

- Student reported on FAFSA that he or she is a qualifying veteran and the VA did not confirm this.
- Only reason student is independent
- Student on active duty
- VA Match Flag = 4
- Student action
  - Provide release orders to school







# NASFAA's Annual Training SAR Comment Codes 2017–18

## National Student Loan Data System



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### National Student Loan Data System (NSLDS)

- Verifies student's default and overpayment status
- Informs school if fraudulently obtained Title IV funds have not been repaid
- Ensures annual and aggregate award limits are not exceeded
- Performs check for a student Unusual Enrollment History (UEH)
- Informs the school if the student subsequently becomes ineligible for Title IV funds based on new data in NSLDS



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## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 115

- Discharge of one or more of the student's federal student loans
- Loan has been discharged due to disability
- NSLDS Results Flag = 1 (record matched, data sent)
- Student action
  - Provide a physician regarding ability to engage in gainful activity
  - Student statement acknowledging new Title IV funds cannot be discharge for existing impairment

### SAR Comment Code 116

- Student has one or more student loans in an active bankruptcy status
- Under certain circumstances the student remains eligible for Title IV aid
- NSLDS Results Flag = 1
- Student action
  - Provide documentation confirming the debt is dischargeable



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Codes 254, 255, 256, and 260

- Student has exceeded grade level loan limits
- Subsidized or Combined Loan Total Reason Code = 09 or 10
- Student action
  - Repay excess amount borrowed
- School action
  - Review aggregate loan limits on NSLDS

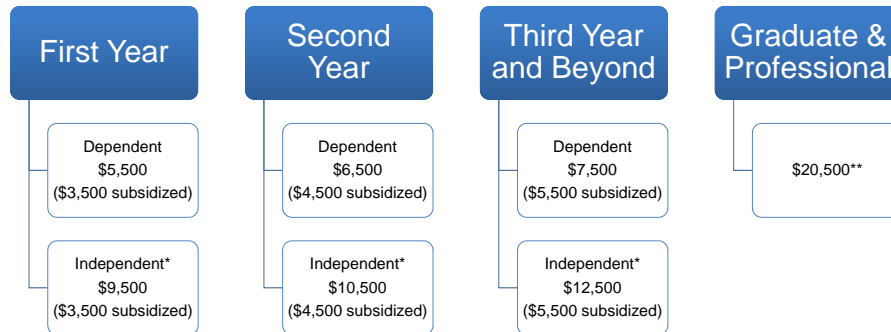
### SAR Comment Codes 392 and 393

- Student has exceeded aggregate loan limits
- NSLDS Graduate Subsidized Loan Limit Flag or Graduate Combined Loan Limit Flag = R
- Student ineligible for additional Title IV funds
- School action
  - Review aggregate loan limits on NSLDS



# NASFAA's Annual Training SAR Comment Codes 2017–18

## Annual Loan Limits

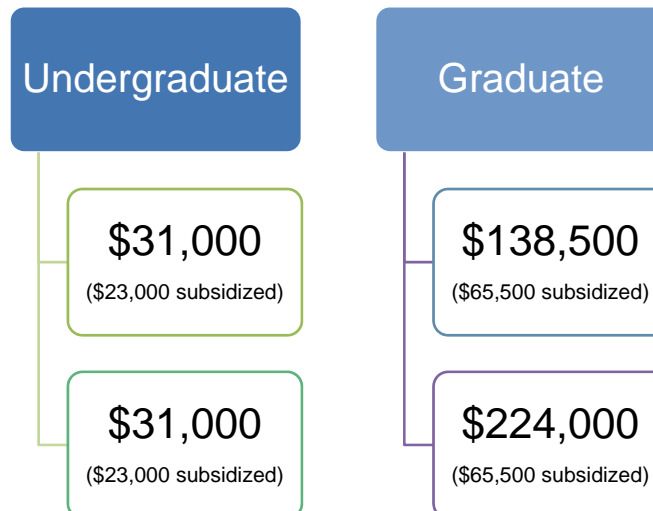


\*Includes dependent students whose parents cannot borrow a PLUS

\*\*Students enrolled in certain health professions programs may borrow an increased amount of Direct Unsubsidized Loan



## Aggregate Loan Limits



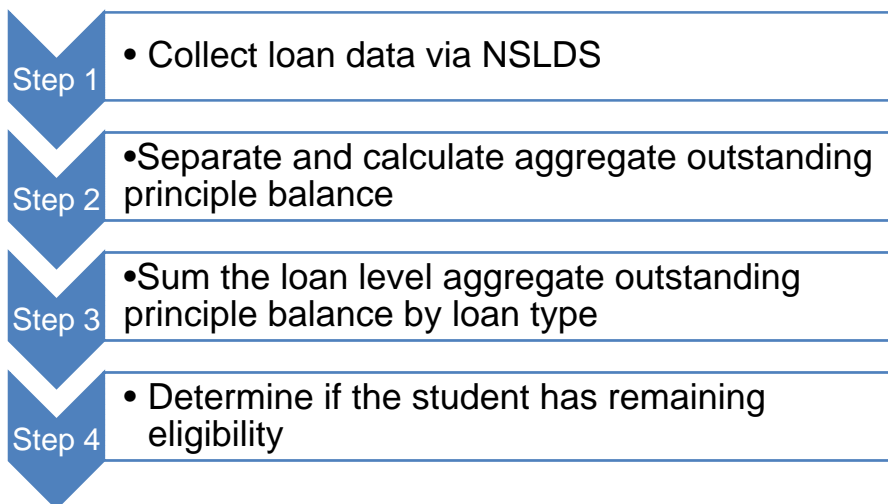


# NASFAA's Annual Training SAR Comment Codes 2017–18

## Case Study 1: Sam

- Sam will be attending Achievement University to earn a second bachelors degree
- He borrowed Direct Loans as an independent undergraduate student and as a graduate student
- He has a C-code that must be resolved

## Separating Undergraduate and Graduate Level Loans



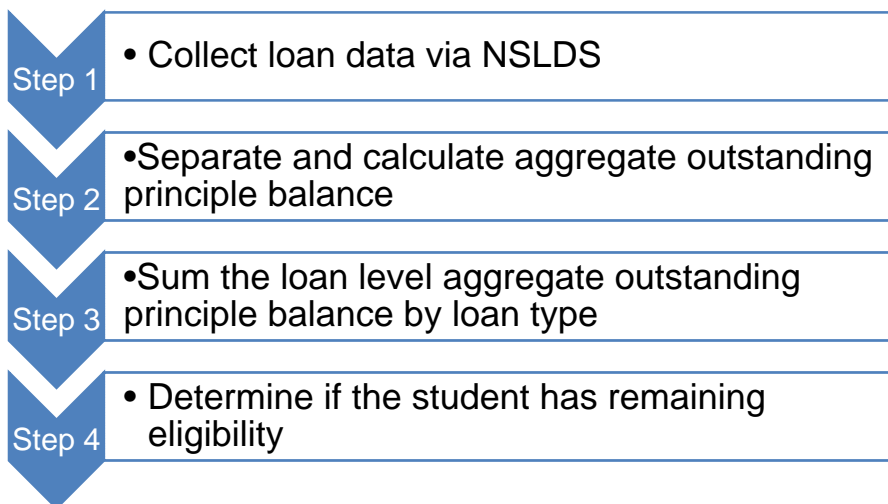


# NASFAA's Annual Training SAR Comment Codes 2017–18

## Case Study 2: Lila

- Lila is a dependent student at Overachiever University
- Her parent borrowed a parent PLUS her freshman year
- Her parent was denied parent PLUS loans her sophomore and junior years

## Separating Undergraduate and Graduate Level Loans





# NASFAA's Annual Training SAR Comment Codes 2017–18

## SAR Comment Code 133

- Student has an overpayment on a Title IV loan
- NSLDS Results Flag = 1
- NSLDS Match Flag = 3
- Overpayment Flag set to Y = overpayment
- Resolution depends on the overpayment information found in NSLDS

## Overpayment SAR Comment Codes

Federal Pell Grant	FSEOG	Federal Perkins Loan	TEACH Grant	IASG
020	010	086	289	309
038	077	090	293	313
039	079		294	314



## NASFAA's Annual Training SAR Comment Codes 2017–18

### Overpayment SAR Comment Codes

Federal Pell Grant	FSEOG	Federal Perkins Loan	TEACH Grant	IASG
041	065	100	290	310
042	066	101	291	311
043		102	292	312

### SAR Comment Codes 346 and 347

- Student has reached or exceeded the Pell Lifetime Eligibility Used (LEU) threshold
- School action
  - Review NSLDS to determine if student has exceeded Pell LEU
  - If exceeded, the student is ineligible until overpayment is resolved





## NASFAA's Annual Training SAR Comment Codes 2017–18

### Default or Fraudulent Loan SAR Comment Codes

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### Unusual Enrollment History

- NSLDS reveals unusual enrollment patterns
  - Recipients of Federal Pell Grants and certain Direct Loans within previous four years
  - Undergraduate and graduate enrollment reviewed independently
  - School may need to review enrollment records
    - If no academic credit earned, student must explain
    - Student must have opportunity to appeal
    - School's decision is final



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Codes 359 and 360

- Unusual Enrollment History (UEH)
- NSLDS Unusual Enrollment History  
Flag = 2 or 3
- Student action
  - Provide documentation requested by school
- School Action
  - Review student's enrollment and NSLDS records for specified award years
  - Request documentation, as necessary

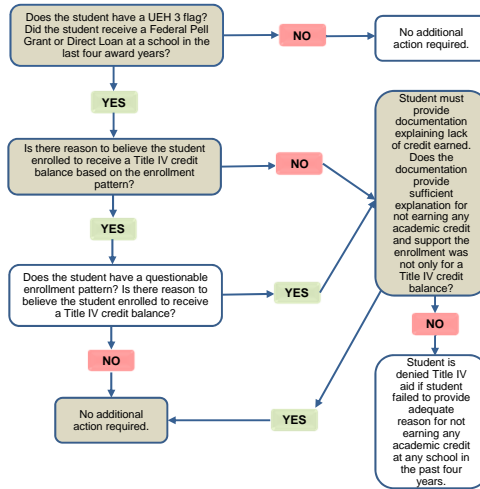
### Case Study 3: Sailor

- Has attended three different schools before transferring to Constellation University
- She has earned credit at only one school she has attended
- Her SAR/ISIR has a UEH flag of “3” and a SAR comment code of 360



# NASFAA's Annual Training SAR Comment Codes 2017-18

## UEH Decision Tree UEH 3 Flag (Comment Code 360)



Department of Justice



# NASFAA's Annual Training SAR Comment Codes 2017–18

## Department of Justice (DOJ)

- Drug Abuse Hold File Match
  - Verifies if a student is included
  - Determines if a student has a qualified drug conviction for the sale or possession of illegal drugs while receiving Title IV aid
- FAFSA Question #23

## Drug Convictions

- Loss of eligibility may be regained based on the type of conviction
  - Possession
  - Sale





## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 009

- FAFSA not processed due to issues with Anti-Drug Abuse Act of 1988
- Reason for the comment
  - DOJ hold on student
- Student action
  - Call number provided within 30 days

### SAR Comment Code 052

- Student initial answer to FAFSA question #23 has changed
- Reason for the comment
  - Drug conviction questions changed from “Yes (Part Year)” or “Yes/Don’t Know” to “No”
- Student action
  - Review response to this question



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 053

- Applicant left FAFSA question #23 blank
- Student is not eligible for Title IV aid with this question left blank
- Student action
  - Correct this question by providing a response

### SAR Comment Code 054

- Student's response to FAFSA question #23 was 2 "Yes (Part Year)"
- Student is ineligible for Title IV aid for part of the 2017–18 award year
- Student action
  - Contact the financial aid administrator for eligibility determination
- School action
  - Review the student's eligibility for the 2017–18 award year



## NASFAA's Annual Training SAR Comment Codes 2017–18

### Regaining Eligibility

- Required amount of time has passed;
- Satisfactory completion of approved drug rehabilitation program;
- Passes two unannounced drug tests administered by an approved drug rehabilitation program without passing the rest of the program.

### SAR Comment Code 056

- Student's response to FAFSA question #23 was 3 "Yes" on transactions other than original paper FAFSA
- Student is ineligible for Title IV aid
- Student action
  - Review response for accuracy
  - If incorrect, follow directions provided in comment



## NASFAA's Annual Training SAR Comment Codes 2017–18

### SAR Comment Code 058

- Student's response to FAFSA question #23 was 3 "Yes" on transactions other than original paper FAFSA
- Student is ineligible for Title IV aid
- Student action
  - Review response for accuracy
  - If incorrect, follow directions provided in comment

### Case Study 4: Lucas

- Lucas is a junior at Notable College
- He completed the 2017–18 FAFSA on December 21, 2016
- Lucas was arrested and convicted of a drug-related offense while attending spring semester
- Institution is aware of the conviction





# NASFAA's Annual Training SAR Comment Codes 2017-18

## Conclusion

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