

## 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
Are refugee and asylee students eligible for federal financial aid?	Yes. Students whose documentation supports refugee or asylee status are eligible for Title IV aid. The following noncitizen statuses also are eligible:
	<ul> <li>Lawful permanent resident;</li> </ul>
	Conditional resident;
	<ul> <li>Parolee (i.e., "Parolee-Indefinite" or "Parolee-Expires");</li> </ul>
	Cuban-Haitian Entrant;
	<ul> <li>Victim of human trafficking (T-visa);</li> </ul>
	<ul> <li>Battered immigrants-qualified alien under the Violence Against Women's Act (VAWA); and</li> </ul>
	American Indian born in Canada (i.e., Jay Treaty student)
	The Federal Student Aid Handbook provides guidance on verifying eligibility and the documentation requirements for each noncitizen category.
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?	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.
3. A refugee or asylee student originally stated on the Free Application for Federal Student Aid (FAFSA®) that they had completed a bachelor's degree but have now 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?	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. Check for understanding of the question with the student and explain the penalties for misrepresentation and the potential for having to repay all Title IV aid received if the answer is not correct.  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.

Question	Answer
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 use a foreign diploma evaluation service. Institutions cannot require students to provide translated versions of the diplomas or transcripts (unless the school requires translated diplomas or transcripts from all students with foreign diplomas as part of its admissions policy).
5. When do I submit the student's documentation of refugee or asylee status to the Systematic Alien Verification for Entitlement (SAVE) system?	Schools must complete third-step verification via SAVE when:  • The student's documentation supports their claim of eligible noncitizen status, but the student's status was not confirmed during the secondary match process; or  • The student's status was confirmed but the school has conflicting information.  Refer to the SAVE System Instructions for U.S. Department of Education (School) Users guide for complete instructions on the third-step verification process.
6. I submitted a third-step verification request and I am waiting for a response. Can I award aid in the meantime?	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 award 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 the awarded aid.
7. What if I receive a SAVE response back after 15 business days and I have already disbursed aid?	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 aid except wages earned through Federal Work Study (FWS).  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.
8. 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?	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.