



General Provisions 3.6.1

Unusual Enrollment History (UEH)

POLICY STATEMENT

If a student displays an unusual pattern of enrollment or receipt of Federal Pell Grant or Federal Direct Loan funding, the U.S. Department of Education (ED) will assign an Unusual Enrollment History (UEH) flag and FAFSA “C” code in order to address possible fraud and abuse in the Title IV student aid programs. Students are assigned a flag value of “2” or “3,” each requiring different processing, as described below. Also, NSC may choose to treat certain students as though ED has assigned a UEH flag “3” if there is reason to believe that a student remained enrolled for the sole purpose of collecting Pell Grant or Direct Loan funding (see DCL-15-05).

To resolve a UEH flag of “2,” NSC will first check the student’s enrollment and financial aid records to determine if, during the four award years prior to the current award year the student received a Pell Grant or Direct Loan at NSC. If so, NSC will verify that the student remained enrolled and earned credit during each of the award years in which she or he received a Pell Grant or Direct Loan. If the student did earn credit during each award year reviewed, then the student is eligible to receive federal aid in the current award year. If the student did not receive a Pell Grant or Direct Loan at NSC, or did not earn credit during each year they did receive such funding, NSC must treat the student as if he or she received a flag of “3.”

To resolve a UEH flag of “3,” NSC must check the student’s academic transcripts to determine if she or he earned academic credit at each school 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 credit at each school at which he or she received Pell Grant or Direct Loan funds during each award year reviewed, then the student is eligible to receive federal aid in the award year for which the flag and “C” code was placed.

If the student did not earn academic credit at a previously attended institution and, if applicable, at NSC, the student may submit documentation explaining why he or she failed to earn academic credit. An NSC financial aid administrator 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 financial aid 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 student should provide, to the extent possible, third party documentation to support his or her 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, students should, to the extent possible, provide third party documentation to support their claims.

The FAA 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. The reasons for the decision must be documented and maintained for possible review.

Provisional Eligibility: UEH Probation

If the FAA judges the explanation to be sufficient to explain the deficiency, the FAA will offer the student one semester of UEH Probation, which will require the student to submit and follow an academic plan prepared with a faculty or academic advisor and successfully complete the equivalent of one semester of half-time enrollment (6-8 credits). (See 34 CFR 668.34(c)(3)(iii)(B) and (c)(4), and 668.34(d)(2)(ii)(B) and (d)(3). The student will also be required to sign a Statement of Educational Purpose before any aid will be disbursed. If the student successfully completes 6 credits under the academic plan, the student is considered to have regained eligibility. Otherwise, the student's provisional eligibility will be revoked until the student regains eligibility as described below in the section, "Regaining Aid Eligibility under UEH."

Denial of Eligibility under UEH

If a student did not earn academic credit at one or more of the relevant institutions and does not provide, to the FAA's satisfaction, an acceptable explanation and documentation for each of those failures, or the student does not successfully satisfy the requirements of the UEH Probation, NSC must deny the student any additional Title IV, HEA program assistance and also will not consider the student for any state or institutional aid that requires the completion of the FAFSA.

Regaining Aid Eligibility under UEH

If NSC denies a student continued Title IV, HEA program assistance under the circumstances described above, the student may subsequently regain Title IV, HEA program eligibility by successfully completing the equivalent of one semester of half-time enrollment (minimum of 6 credits). (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 NSC'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 Federal 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.) Eligibility for state and institutional grants and scholarships will be reinstated according to the requirements for the Federal Pell Grant.

Opportunity to Appeal UEH Decisions

Students wishing to appeal UEH decisions may submit a written statement to Director of Financial Aid requesting a review of the FAA's decision. The Director will review the original statement as well as any additional information or documentation provided by the student and issue a final response in writing. These institutional determinations are not appealable to ED nor another agent of NSC.

Authority for Denial of Eligibility under UEH

The authority for an institution to deny Title IV, HEA program assistance under the circumstances described in GEN13-09 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.

REASON FOR POLICY

This policy is required to comply with guidance in DCL GEN-13-09

FORMS/INSTRUCTIONS

The following forms can be obtained at nsc.edu/finaid:

- Unusual Enrollment History Explanation
 - Statement of Educational Purpose
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CONTACTS

SUBJECT	CONTACT	PHONE	EMAIL
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DEFINITIONS

ED – the United States Department of Education

FAFSA – Free Application for Federal Student Aid

Financial Aid Administrator (FAA) – for the purposes of Professional Judgment, FAAs include Director, Coordinator, and Counselor.

HISTORY

Reviewed June 11, 2014

Revised February 19, 2015

“Forms/Instructions”: Addition of “Unusual Enrollment History Appeal.”

Revised March 24, 2015

Addition of Federal Direct Loan

Revised March 31, 2015

Revised UEH section headers
Added information relating to DCL-15-05
Added UEH appeal provisions
Added definitions for ED

Revised November 24, 2015

Removed UEH appeal provisions
Added UEH explanation provisions

Revised March 23, 2016

Moved from Section 3.6 to 3.6.1
Re-written to clarify distinction between flags 2 and 3
Added section header “Provisional Eligibility: UEH Probation”
Added section “Opportunity to Appeal UEH Decisions”