



Undocumented Students and the FAFSA Denver Scholarship Foundation Inquiries through Senator Bennet's Office

January 17, 2014

Overview: DSF submitted several questions to Senator Michael Bennet's team to gain clarity on how best to advise undocumented students regarding use of the Free Application for Federal Student Aid (FAFSA), considering both immigration and financial aid implications. Rachel Velasquez, Judicial Affairs, and Molly Fishman, Education, shared our questions with their contacts in the Department of Education. Then, they discussed the responses and implications with DSF. The complete list of questions and answers is included below.

Summary: There are no risks in undocumented students submitting the FAFSA, and they should be encouraged to use the online application. DACA students should use their DACA SSN, undocumented students without SSNs should use 001-01-0001. All undocumented students, DACA and non-DACA, must sign the FAFSA with a signature page because they cannot obtain PINs. FAFSAs for all undocumented students will be rejected but the information will be sent to the colleges indicated on the form, the colleges will then calculate an EFC.

Please start advising students accordingly. Please direct any other questions about FAFSAs for undocumented students to Carmela and Louise.

We will continue to work with individual colleges to learn the financial aid process for undocumented students at each institution and we will keep you updated as we learn more.

1) Question: Are there any risks to undocumented students associated with completing the FAFSA?

We understand that it is important for students to answer the question about their eligibility for federal student aid accurately, to indicate that they are not eligible and to avoid falsely indicating that they are U.S. citizens. Beyond that, are there other reasons undocumented students should be cautious about completing a FAFSA?

Answer: No – Unless a student is involved in a pending criminal investigation, the information submitted on the FAFSA will not be used for any sort of prosecution, per an agreement between the federal Department of Education (ED), the Department of Homeland Security (DHS), and the Social Security Administration. The information on the FAFSA is only used to verify accuracy with SSA. When there is a mismatch between the name and SSN, the FAFSA is rejected and an Expected Family Contribution (EFC) is not calculated by the central processor, but the information is still provided to the colleges the student listed. The colleges may then use the FAFSA data and follow up with the students to calculate an EFC.

2) Question: Should undocumented students be advised to submit a paper or online FAFSA?

Some colleges advise students to submit a paper FAFSA, rather than using the online system. From what we understand, they advise using the paper version to avoid the online requirements to provide a Social Security Number. Other colleges require students to submit the FAFSA online and offer varied guidance on how to complete the SSN field. From the federal perspective, should students be advised to avoid the online FAFSA? If so, please help us understand why.

Answer: ED indicated it is always best for students to submit the **FAFSA online**, unless otherwise directed by their college, because processing times are so much faster.

In the SSN field, use **001-01-0001** for all students who do not have a SSN. A nine-digit number must be provided in the student SSN field on the FAFSA, or it will not be processed. Students may NOT enter 000-00-0000. To avoid accidentally entering someone else's actual SSN, students who do not have a SSN should enter 001-01-0001. Then, the FAFSA may be completed, it will be rejected because the information will not match SSA records, but it will be processed and the information will be sent to the colleges included on the form. Although, students are not allowed to use all zeroes as their SSN, undocumented parents should continue to use all zeroes.

Students can use 001-01-0001 to create an account that they can log back into to complete a partially completed FAFSA, make corrections, access their SAR, etc.

3) Question: If undocumented students have a SSN through DACA, should they use that SSN on the FAFSA?

We have received conflicting advice from several sources about whether undocumented students who have an SSN because they received employment authorization should use their SSN on any state or federal forms other than those associated with employment. The main explanation we have heard is that using the SSN on federal financial aid forms or the Colorado College Opportunity Fund application may be considered an attempt to access benefits for which they are not eligible. What guidance can you provide about how SSNs received through DACA can be used in general, and in regard to the FAFSA?

Answer: Yes – if students have a SSN, they should use it on the FAFSA. For those who have a SSN through DACA, the verification with SSA will confirm that they are ineligible for federal student aid. Students in this situation should continue to be advised to answer the question “Are you a U.S. Citizen?” accurately by selecting “No, I am not a citizen or eligible noncitizen.” Their FAFSA will be rejected, but processed and the information will be sent to the colleges included on the form.

4) Question: If undocumented students use the online FAFSA system and they have a SSN through DACA, are they able to apply for a PIN and use it to sign the FAFSA electronically?

Answer: No - Undocumented student with DACA SSN cannot apply for a PIN. All undocumented students, including those with a DACA SSN, should complete the FAFSA online and use the printed signature page to sign the form.

5) Question: If undocumented students do not have a SSN, how should they fill in the SSN field for the online FAFSA? For the paper FAFSA?

Some colleges advise students to enter all zeroes, or all nines, or use 123-45-6789, but there are concerns about providing false information. There are also questions about whether the online system will accept a FAFSA that includes an entry for SSN that is the same as any other submitted FAFSA. If all students are advised to enter the same number, will the online system accept their FAFSA submission? If students are required by their college to submit an online FAFSA to be considered for institutional aid, we want to advise them on how to do so without jeopardizing their future opportunity to pursue citizenship.

Answer: Use 001-01-0001 in place of the SSN for all students who do not have a SSN. The online system will accept FAFSAs from more than one student using the same SSN. Verification

with SSA will show a mismatch, the FAFSA will be rejected, but processed and the information will be sent to the colleges included on the form.

- 6) Question: When undocumented students submit a FAFSA that clearly indicates they are ineligible for federal student aid, will the centralized FAFSA processing system calculate an Expected Family Contribution for them?**

Answer: No – When the SSA verification shows a mismatch, or confirms that a student with a DACA SSN is ineligible for federal student aid, an EFC is not calculated by the central processor. The FAFSA is rejected, but processed and the information will be sent to the colleges included on the form. Colleges will then be able to calculate an EFC.

- 7) Question: If undocumented students mistakenly indicate they are U.S. Citizens or Lawful Permanent Residents on the FAFSA, what steps should be taken to limit the impact on their future opportunities to pursue citizenship?**

Some of the guidance we have received indicates that students must contact the Department of Education and each college that received their FAFSA in writing to request a retraction of their FAFSA. Is that an appropriate course of action? Is that sufficient to ensure that the student is not later held accountable for falsely claiming to be a U.S. Citizen or LPR?

Answer: No follow up should be necessary – Per the agreement between ED and DHS, FAFSA information cannot be used to prosecute students and DHS cannot access FAFSA information, unless the student is involved in an ongoing criminal investigation or prosecution.

- 8) Question: Are you aware of efforts at the federal or state level to provide guidance or requirements for colleges regarding how they determine financial need for undocumented students?**

Answer: No – ED seeks to keep states and colleges informed, but determination of financial need for undocumented students is up to the colleges.