

Illinois Residency and Verification for ISAC Programs Frequently Asked Questions (FAQs)

Q. Do all ISAC programs have an Illinois residency requirement?

A. The following ISAC programs have an Illinois residency requirement:

- Monetary Award Program
- Illinois Veteran Grant (special residency conditions apply)
- Minority Teachers of Illinois Scholarship
- Golden Apple Scholars of Illinois Program
- Special Education Teacher Tuition Waiver
- Higher Education License Plate Program
- Illinois Teachers Loan Repayment Program
- Nurse Educators Loan Repayment Program
- Veterans Home Nurse Loan Repayment Program

These two ISAC programs do not have Illinois residency requirements, however, there are other Illinois-related eligibility criteria that must be met:

- Illinois National Guard Grant - student must be active in the Illinois National Guard and attending an Illinois public institution
- Grant Programs for Dependents of Police, Fire and Correctional Officers - the officer must have been a resident at the time of death or disability and the student must be attending an Illinois institution that participates in the program

Q. Are colleges responsible for verifying Illinois residency only for those applicants who are selected for federal verification?

A. It is the college's responsibility to ensure that all recipients of ISAC programs meet all of the eligibility requirements associated with the program(s) that the student is receiving, including Illinois residency for those ISAC programs that require it. The financial aid office must have policies and procedures in place to help identify which students can be awarded based on application data and which may have conflicting information that needs to be resolved by collecting additional information.

Q. Must colleges verify residency for all Monetary Award Program (MAP) recipients?

A. As stated above, policies and procedures need to be in place to ensure that all students who are receiving an ISAC gift assistance program are meeting the eligibility requirements specific to that program. One of the eligibility criteria for MAP recipients is that the student is an Illinois resident,

so it is the financial aid office's responsibility to ensure that students receiving a MAP grant are meeting the residency requirements. Checking an applicant's self-reported data on the Free Application for Federal Student Aid (FAFSA®) may be enough to confirm residency; however, there must also be processes in place to identify those students where additional confirmation may be necessary. At the point when the request for MAP payment is submitted for a particular student, the institution is certifying that the student meets all eligibility criteria for the program, including residency.

Q. What are some examples of situations in which the financial aid office does not need to collect additional documentation to verify Illinois residency?

A. Following are examples of when additional documentation would not need to be collected from the student applicant or parent(s) to verify residency:

- A dependent student and the student's parent(s) provide an Illinois address on the FAFSA and there is no conflicting information to suggest that Illinois is not their true, fixed and permanent home;
- An independent student provides a date of residency on the FAFSA which indicates that they have been a resident of Illinois for more than 12 months prior to the start of the academic year for which the award would be received, and there is no conflicting information to suggest that Illinois is not his/her true, fixed and permanent home;
- The student was enrolled at an ISAC-approved Illinois high school for the preceding consecutive 12 months prior to the start of the academic year for which assistance is requested;
- The student was enrolled in an ISAC-approved MAP institution for the preceding consecutive 12 months prior to the start of the academic year for which assistance is requested;
- The student received payment of a MAP award during the previous academic year.

Keep in mind, however, that in all cases, and regardless of the examples noted above, if the financial aid office is aware of or has conflicting information which suggests that a student applicant and/or a dependent student's parent(s) may not be meeting ISAC residency requirements, the financial aid office would need to request additional documentation to confirm residency status.

Q. What are some examples of conflicting information?

A. In short, any information or documentation that appears to question the validity of a student's claim of Illinois residency can be considered conflicting information.

Some examples of information that should be investigated include:

- information or documentation in the college's records that shows the student or the student's parent with an address or residency in a state other than Illinois.

- an incoming freshman student indicates on the FAFSA that s/he graduated from a high school in a state other than Illinois, but the parents indicate on the FAFSA that they have been residents of Illinois for more than five years.

Q. Does use of the term “verify” mean that documentation must be collected from every MAP recipient to verify residency?

A. ISAC recognizes that, from a college’s perspective, the term “verify” implies that colleges will need to collect documentation and/or ask students to sign statements confirming the validity of their information. However, just as the federal verification process has measures in place to simplify the verification process in certain situations, the same applies to ISAC verification rules.

While it is the college’s responsibility to partner with ISAC to ensure that all MAP recipients meet the residency requirement, it does not mean that documentation must be collected from every MAP recipient. Information that is provided on the FAFSA and in ISAC’s GAP Access portal can be relied on to confirm residency for many MAP recipients, and ISAC’s [administrative rules](#) specify conditions when it may not be necessary to collect additional documentation to verify residency.

Q. If a student self-reports Illinois residency (for more than one year for independent students) on their FAFSA and the Institutional Student Information Record (ISIR) and GAP Access reflects this, is it necessary to collect any additional documentation from the student?

A. For a dependent student, if the parents have indicated on the FAFSA that their state of residence is Illinois, no additional documentation is needed. For an independent student, the self-reported data on the FAFSA can be relied on if the answers to the length of residency questions indicate that s/he has been a resident of Illinois for more than 12 months prior to the start of the academic year and there is no known conflicting information.

Q. What data elements on the ISIR can be used to check residency and/or determine if additional documentation is needed?

A. In addition to the address and state residency information that is provided on the FAFSA, information about the student’s high school data may be helpful in determining if additional documentation is needed.

Q. What data fields in GAP Access can be used to check Illinois residency for MAP recipients?

A. The data elements that appear in GAP Access that can be used to confirm self -reported Illinois residency data are:

- Dependent student’s address
- Student’s State/Residence Date field
- Parent’s State/Residence Date field

School Certification Data		
Citizenship Fields	Selective Service Fields	Verification Fields
Citizenship Status 1	Are you Male or Female F	Selected for Verification N
Alien Registration #	Selective Service to Register	
DHS Match Flag	Selective Service Match Flag	
Secondary DHS Match Flag	Selective Service Reg Flag	
SSA Citizenship Flag A	NSLDS Default Fields	
Residence Fields	NSLDS Match Flag 1	
Student's State Residence Date IL -	NSLDS DB Results Flag 3	
Parent's State Residence Date IL -		
Address	Date of Birth	
1234 Street Name City, IL Zip Code	Appl Receipt Date 10/01/2019	
	CPS Processing Date 10/02/2019	
	Last Update 10/02/2019	

Additional data elements that appear in GAP Access that can assist in confirming Illinois residency are:

- Disqualify Codes
- Paid Previous Codes (Displays which term in the prior academic year the student was paid)

Details	
Depend Code D	Update Type U
Academic Level 4-Senior	As Of Date
Living Allowance \$4,875	Disqualify
EFC Change Flag	MAP Suspend
Primary EFC \$8,780	ISAC Default N
Adjusted EFC \$18,482	MAP Paid Credit Hours 000
Estimated Pell \$0	Paid Previous 3
Adjusted Pell \$0	Continuing Y
Student Contribution \$1,800	ING Certified
Student Change Flag	

Code	Definition of Disqualify Code
1	Dependent student, parents NOT Illinois residents.
2	Independent student NOT an Illinois resident.
4	Invalid (or blank) class level, such as graduate student.
6	Loan default is overridden; payment is allowed
7	MAP Paid Credit Hours exceed 134.
8	Student is in default on a Stafford loan.
9	Other ISAC disqualify.
Blank	Not disqualified.

Code	Definition of Paid Previously Code
0	Student was not paid in the previous year.
1	Student was paid the 1 st Semester of the previous year.
2	Student was paid the 2 nd Semester of the previous year.
3	Student was paid the 1 st Quarter of the previous year.
4	Student was paid the 2 nd Quarter of the previous year.
5	Student was paid the 3 rd Quarter of the previous year.

Q. Does a dependent student need to show proof that the parent lived in Illinois before the first FAFSA filing date, or simply that the parent is currently an Illinois resident?

A. If a dependent student's parent indicates on the FAFSA that s/he is a resident of Illinois, the student would not need to provide any additional documentation to prove the date residency was established. There are no rules regarding when a parent must establish residency in Illinois, nor is there a time period requirement for which they must have resided in Illinois. If, however, the financial aid office has reason to believe that conflicting or inaccurate information has been provided, additional documentation should be collected.

In order to be considered a resident of Illinois, the parent must physically reside within the State of Illinois and Illinois must be his or her true, fixed and permanent home.

If a dependent student and/or his/her parent move to Illinois after the FAFSA has been completed, the applicant may correct the FAFSA to provide a new address and update the state of residence information.

Q. If a dependent student's parents are divorced and the parent who is required to provide their information on the FAFSA resides out of state and the other parent lives in Illinois, is the student eligible to receive MAP?

A. No. The parent who is required to complete the FAFSA must be an Illinois resident in order for the dependent student to meet the residency requirements for MAP.

Q. If a dependent student's parent is in the Armed Forces and not currently residing in Illinois, and the student wants to enroll in an Illinois institution, does s/he meet Illinois residency requirements?

A. U.S. Armed Forces members and foreign missionaries qualify as Illinois residents if they:

- physically resided in Illinois immediately prior to entering the U.S. Armed Forces (missionaries must reside in Illinois for six continuous months prior to entering missionary service);
- return or plan to return to Illinois within six months of the conclusion of service; and
- can demonstrate that their domicile was Illinois throughout such service.

A foreign missionary is an individual who is assigned duty outside the United States by an organization that engages in educational, philanthropic, humanitarian, or altruistic works. The missionary organization must have been engaged in placing foreign missionaries for at least five years and must be exempt from the payment of federal taxes. Some examples of such organizations include the Peace Corps and the Evangelical Alliance Mission.

Applicants who are dependents of U.S. Armed Forces members or foreign missionaries will be considered an Illinois resident if their parent(s) meets the Illinois residency requirements listed above.

Applicants who are the spouses of U.S. Armed Forces members or foreign missionaries must demonstrate that their absence from Illinois was the result of residing with a spouse during the period of service outside the state, and must also demonstrate that their domicile continues to be Illinois.

Q. If a student changed dependency status to become an independent student, but also received a payment of MAP the previous academic year, would Illinois residency need to be verified?

A. An independent student must have resided in Illinois for 12 continuous months prior to the start of the award year and Illinois must be his/her true, fixed and permanent home. If the student does not meet this requirement -- even if s/he received MAP in the previous year -- the student would not be eligible for MAP as an independent student.

Q. If an independent student indicates a state other than Illinois on the FAFSA, but makes a correction to provide an Illinois address, what are the college’s responsibilities regarding verification of residency?

A. In this case, it will be the school’s responsibility to ensure that the student meets the 12-month residency requirements for independent students. Also, in this scenario the financial aid office would be aware of conflicting information regardless of how the length of residency questions were answered in the second/subsequent transaction, because the student’s initial FAFSA had listed a state other than Illinois.

Q. If a student is awarded MAP in May, but moves out of state in August before the fall term begins, is the student still eligible to receive the MAP award?

A. Yes. Applicants who cease to be Illinois residents after MAP award notification may complete the academic year with the awarded grant.

For example, if a dependent student's parents move out of state after completing the FAFSA in February and after receiving notification of MAP eligibility in May, the student remains eligible for MAP for the full award year that begins in August, assuming the student continues to meet all other eligibility requirements.

Q. What is considered “adequate” checks and balances in regard to a college’s system of internal controls to ensure that verification of Illinois residency is completed and documented prior to awarding and certifying eligibility for a MAP award?

A. During an ISAC program review, ISAC’s review team will be looking to ensure that a process is in place to determine which students meet the basic requirements to be considered an Illinois resident based on self-reported data on the FAFSA, and a way to identify those students who may require additional documentation.

A best practice would include written policies and procedures regarding the Illinois residency verification process, as well as a checklist for determining when additional documentation would be required.

Q. What is meant by “12 continuous, full months” for independent students and how can schools document this?

A. For an independent student to be considered a resident of Illinois s/he must have physically resided in Illinois at the time of application, resided for 12 continuous full months immediately **prior to the start of the academic year** for which assistance is requested, and Illinois must be his/her true, fixed, and permanent home.

For example, an independent student attending an institution with an academic year starting on August 23, 2020 must have resided in Illinois from August 23, 2019 through August 22, 2020. If the school is requiring the student to provide documentation to confirm residency during the relevant timeframe, the school can rely on suggested types of documentation listed in ISAC's General Provisions, such as a driver's license, utility bills, rental documents, etc. as long as the dates on the documents indicate the applicant has resided in Illinois for the relevant 12 continuous, full months. Schools may also choose to request/accept additional types of documentation. It is not necessary for schools to collect documentation for each of the 12 months unless the schools is aware of conflicting information and/or is questioning that the 12 month residency was continuous.

Q. ISAC rules state that verification is not required for students who were enrolled in a MAP institution or approved Illinois high school for the preceding 12 months prior to the start of the academic year, however, students are often not in school during the summer months so does that time count toward meeting the preceding 12-month requirement?

A. Yes, the summer months (e.g. June-August) would be counted in the 12-month timeframe if the applicant was enrolled in an ISAC-approved MAP institution or Illinois high school for the full academic year in the preceding 12 months prior to the start of the academic year and there is no conflicting information to suggest that Illinois is not his/her true, fixed and permanent home.

Q. Can a student use an expired government issued photo ID to prove identity and to prove Illinois residency?

A. To prove identity the student must appear in person at the school and present a valid, unexpired, government-issued photo ID such as a passport or a driver's license or other state-issued ID. The ID needs to be unexpired at the time it is checked. For proving identity, it does not matter if the ID is due to expire during the award year. For proving Illinois residency, the student must present a valid, unexpired, government-issued photo ID. In response to challenges resulting from the COVID-19 pandemic, the U.S. Department of Education (ED) and ISAC have provided guidance allowing temporary exceptions to this requirement.

Q. Can a student use an expired and a renewed Illinois driver's license to show continuous residency?

A. Yes, the dates recorded on the documents must indicate the applicant has resided in Illinois for the relevant 12 continuous, full months. The institution may choose to request additional documents to demonstrate Illinois residency.

Q. What can be done if the financial aid office is not able to confirm Illinois residency, but the student is insistent that s/he is an Illinois resident?

A. Regardless of the student's claim, if residency cannot be determined, the student or the institution may verify residency through ISAC's appeal process.

Q. Can a Temporary Visitor's Driver's License (TVDL) be considered acceptable documentation to confirm residency for ISAC programs?

A. Since it states on the TVDL that it is not valid for identification, the TVDL is not considered acceptable documentation to confirm Illinois residency for ISAC programs. However, just because a parent has a TVDL does not mean that they do not meet the residency requirements for an ISAC Program. In order to obtain a TVDL, a person had to have resided in Illinois for 12 months prior to it being issued, so the student or parent could provide the same documentation they used to obtain a TVDL. See the Illinois Secretary of State's website for more information about the TVDL www.cyberdriveillinois.com/departments/drivers/TVDL/tvdl.html.

Q. Is a temporary driver's license (TDL) valid for confirming IL residency?

A. Yes. A temporary driver's license is now issued in Illinois before they mail/provide the permanent card to the individual, so it would be acceptable if the school is comfortable with the condition of the document. Or, the school could require the student to bring in the actual license once they've received it. It is ISAC's understanding that the permanent card is received in fairly timely manner.