

## 2020-21 Operational Guide for Alternative Application Processing

Issue	Guidance	Regulatory/Rule Reference
<b>RISE Act Eligibility</b>		
<p><i>If a student completed a FAFSA but did not pass the database match checks, can they complete an Alternative Application?</i></p>	<p>The Alternative Application is not intended to be an alternate option for students who do not pass the database match checks on the FAFSA. It is intended for students who meet the specific eligibility criteria in the RISE Act legislation.</p> <p>If the student completed a FAFSA in error and meets all of the criteria specified by the RISE Act, the student may complete the Alternative Application.</p>	<p>Illinois <a href="#">Public Act 101-0021</a></p>
<p><i>For students who have filed both a FAFSA and an Alternative Application, is the school responsible to compare and resolve conflicting data?</i></p>	<p>If a school is aware that a student completed a FAFSA and the Alternative Application, the school should review the ISIR to determine if there are eligibility issues that would need to be resolved before awarding MAP.</p> <p>Schools are not expected to check all Alternative Applications to see if those students have also submitted a FAFSA.</p> <p>It is in a student's best interest to complete the FAFSA if eligible to do so and to resolve eligibility issues that may be flagged on an ISIR to maximize the amount of financial aid the student is eligible to receive.</p> <p>If an institution has any information that indicates an applicant does not meet the eligibility requirements for MAP or is aware of conflicting information, regardless of which application was used, the school is expected to resolve it.</p>	<p><a href="#">ISAC Administrative Rules</a> - General Provisions, Section 2700.50 Determining Applicant Eligibility</p> <ul style="list-style-type: none"> <li>f) For all other eligibility criteria, if the institution has any information that indicates that the applicant does not meet the eligibility requirements of ISAC-administered programs or if an applicant is selected for verification in conjunction with federal student assistance, that applicant shall be verified for ISAC-administered programs. A selected applicant must be verified for ISAC programs even if the applicant is ineligible for federal student assistance.</li> </ul>
<p><i>Are international students who are in the U.S. on a visa and have attended high school in Illinois for at least three years eligible to complete the Alternative Application?</i></p>	<p>No. They are unlikely to be eligible. The intent of the RISE Act is to retain undocumented students who are Illinois residents and provide them with equitable access to state financial aid.</p> <p>In order for undocumented students to qualify to apply for Illinois aid, all of the RISE Act criteria must be met, including the condition that applicants agree to sign an affidavit stating that they plan to file an application to become a</p>	<p><a href="#">Public Act 101-0021</a></p> <p><a href="#">Alternative Application for Illinois Financial Aid FAQs</a></p>

	<p>permanent resident of the U.S. at their earliest opportunity to do so and that they have not established a residence outside of Illinois. Students with a temporary visa would likely not meet the conditions of those two pre-screening criteria and therefore would not be eligible to complete the Alternative Application to apply for MAP.</p>	
<b>MAP Eligibility</b>		
<p><i>Whose responsibility is it to confirm that the student is eligible for MAP?</i></p>	<p>It is both ISAC's and the college's responsibility to confirm eligibility for MAP in accordance with the requirements listed in ISAC's Administrative Rules in both the General Provisions and the Monetary Award Program sections.</p> <p>This includes resolving any conflicting data that the college may become aware of prior to certifying the student as eligible at the time of the MAP payment request.</p>	<p><a href="#">ISAC Administrative Rules</a> - General Provisions, Section 2700.50 Determining Applicant Eligibility</p> <ul style="list-style-type: none"> <li>a) The evaluation of applicant eligibility is the responsibility of both ISAC and the institution.</li> </ul>
<b>Certifying MAP Eligibility – Illinois Residency</b>		
<p>What are the MAP residency requirements for students who are eligible to complete the Alternative Application?</p>	<p>The residency criteria in the RISE Act determines if a student is eligible to apply for MAP using the Alternative Application. To qualify to receive MAP benefits, students must also be a "resident of Illinois" as defined in ISAC's Administrative Rules:</p> <ul style="list-style-type: none"> <li>A dependent student is a resident of Illinois if the parent of the dependent applicant who is required by the instructions to complete the FAFSA or the RISE Act application (the Alternative Application), physically resides within the State of Illinois, and Illinois is his or her true, fixed and permanent home.</li> <li>An independent student is a resident of Illinois if the applicant physically resides within the State of Illinois (at the time of application), and has so resided for a period of 12 continuous full months immediately prior to the start of the academic year for which assistance is requested and Illinois is his or her true, fixed and permanent home.</li> </ul>	<p><a href="#">Public Act 101-0021</a></p> <p><a href="#">ISAC Administrative Rules</a> - General Provisions, Section 2700.20 Definitions and Section 2700.50 Determining Applicant Eligibility</p>

<p>What if undocumented students and/or parents are unable to provide acceptable documentation to confirm residency?</p>	<p>Just as with FAFSA applicants, if a dependent student and parent have provided Illinois addresses on the Alternative Application and there is no conflicting data to suggest that the data is incorrect, no additional documentation is required.</p> <p>Additionally, an institution is not required to collect documentation to confirm residency if:</p> <ul style="list-style-type: none"> <li>• The applicant received payment of a MAP award during the previous academic year, or</li> <li>• The applicant was enrolled in an ISAC-approved MAP institution or 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.</li> </ul> <p>Colleges are expected to use the same policies and procedures for students who have completed the Alternative Application applicants to confirm Illinois residency as they use for students who have completed a FAFSA.</p> <p>An FAQ document providing additional guidance about confirming Illinois residency can be found on the Partner Training page in the E-Library at isac.org.</p>	<p><a href="#">ISAC Administrative Rules</a> - General Provisions, Section 2700.20 Definitions and Section 2700.50 Determining Applicant Eligibility</p> <p>Illinois Residency and Verification FAQs - <a href="#">Partner Training</a> page in the E-Library at isac.org</p>
<p><b><i>Certifying MAP Eligibility – Selective Service Registration</i></b></p>		
<p><i>What are the Selective Service registration requirements?</i></p>	<p>With very few exceptions, all male U.S. citizens and male immigrants whether documented or undocumented, who are ages 18 through 25, are required to register with the Selective Service System (SSS) within 30 days of either their 18<sup>th</sup> birthday or their arrival in the U.S., whichever is applicable. Males over the age of 25 who did not register when they were required to are likely also out of compliance with Selective Service (unless they are undocumented and can prove they were not in the U.S. at those ages) and should be referred to the SSS website to determine how to become compliant.</p> <p><b>Transgender People</b> According to the U.S. Selective Service System website, “individuals who are born female and changed their gender to male are not required to register. U.S.</p>	<p>U.S. Selective Service System - <a href="http://www.sss.gov/">www.sss.gov/</a></p>

	<p>citizens or immigrants who are born male and changed their gender to female are still required to register.”</p> <p>Selective Service requirements can be complicated, are subject to change, and are dependent upon the applicant’s individual circumstances. Please familiarize yourself with the Selective Service requirements by accessing the Selective Service website at: <a href="http://www.sss.gov/">www.sss.gov/</a></p>	
<p><i>Why does registration for Selective Service matter for the receipt of student financial aid funded by the State of Illinois?</i></p>	<p>Illinois law requires applicants for financial aid that is funded by the State to register with the Selective Service. The law states in relevant part as follows:</p> <p>Each applicant for any student financial aid funded in whole or in part by this State, whether granted by the Illinois Student Assistance Commission ... or otherwise granted by any State supported college or university, and whether to be used at a State supported institution of higher learning or at a private institution, shall submit to the institution he or she is attending Selective Service registration compliance documentation as required by Part 668 of Title 34 of the Code of Federal Regulations... (105 ILCS 5/30-17.1)</p>	<p><a href="#">(105 ILCS 5/30-17.1)</a></p>
<p><i>How did the RISE Act change that requirement?</i></p>	<p>For State aid, Selective Service registration is still required for all male financial aid applicants except transgender students. The RISE Act provided an exception to the Selective Service requirement for transgender students only.</p> <p>For federal AND state aid: Any transgender student who was identified as female at birth is not required to register for Selective Service and is eligible for state AND federal student aid. Schools are encouraged to apprise them of this fact.</p>	<p>Illinois <a href="#">Public Act 101-0021</a></p>
<p><i>What verification or resolution is needed regarding Selective Service registration for undocumented students who have submitted an</i></p>	<p>ISAC does not collect information on the Alternative Application regarding a student’s gender or registration with Selective Service, nor does ISAC select records for verification or provide “C” codes to indicate when there is a potential student eligibility issue and/or conflicting information.</p> <p>It is up to the institution, based on information available to them and in accordance with their policies and procedures, to determine if additional steps</p>	

<p><i>Alternative Application for Illinois Financial Aid?</i></p>	<p>are needed to confirm that a student has registered for Selective Service if they are required to do so.</p> <p>For students whom you may determine are required to register (and do not meet the exemptions for registering), you should resolve those situations in the same manner that you would for MAP recipients who have completed the FAFSA.</p> <p>For those who are required to register and choose not to do so, schools are encouraged to help educate students on the requirements and help them understand the potential long-term impact of not registering if they are required to do so, particularly those who may be on a path to citizenship or pursuing a career or certification that may require it.</p>	
<p><i>What verification or resolution is needed regarding Selective Service registration for transgender students who have submitted an Alternative Application for Illinois Financial Aid?</i></p>	<p>The Alternative Application does not ask if a student has registered for Selective Service and a database match is not performed with the Selective Service System. The application will not be flagged with an eligibility issue related to the Selective Service registration requirement.</p> <p>In the pre-screening questions of the Alternative Application, students who apply for State aid pursuant to the transgender exception under the RISE Act are asked to provide a Social Security Number (SSN) so that ISAC can check to see if the student has used MAP Paid Credit Hours in the past and to confirm that they are not in default on an ISAC-guaranteed student loan.</p> <p>The SSN provided in the pre-screening questions is not considered part of the application data and is not passed along to the college in the Alternative Application Student Record. The student will be identified in GAP Access by an ISAC-assigned unique ID number.</p> <p>Additionally, the gender question in the Alternative Application is an optional field, and the answer provided is not shared with colleges in the Student Record. In order for a school to know a student’s gender (and whether or not the student is required to register for Selective Service), that information would have to be obtained from other school records and/or on a certification statement from the student.</p> <p>It is up to the college, based on information available to them and in accordance with their policies and procedures, to determine if additional steps are needed to</p>	

	<p>confirm that a student is required to register for Selective Service and if so, whether they have registered.</p> <p>For students for whom it is determined that they are required to register and do not meet the exemptions to register, colleges should resolve those situations in the same manner that you would for MAP recipients who have completed the FAFSA.</p>	
<p><i>What would be considered acceptable documentation to confirm Selective Service registration?</i></p>	<p>ISAC will base its consideration of what is acceptable documentation regarding Selective Service registration on the guidance provided by the Selective Service System (SSS) and state and federal laws in place at the time of the application. Based on our understanding of the information currently on the SSS website and federal and Illinois law, we would be looking for the following documentation under the following circumstances:</p> <ul style="list-style-type: none"> <li>• Any documentation from the Selective Service System would be acceptable, and in some conditions, an Illinois driver’s license or state ID may be acceptable as well. <ul style="list-style-type: none"> <li>○ In Illinois, a state law became effective on January 1, 2002 in which a person, age 18 through age 25, who is required to be registered with Selective Service under federal law and who applies for a state driver’s license or renewal, permit, or state I.D. card, is automatically registered with the Selective Service System. January 1, 2002 was the start date when electronic data was transmitted to Selective Service.</li> </ul> </li> </ul> <p><a href="http://www.sss.gov/Registration/State-Commonwealth-Legislation">www.sss.gov/Registration/State-Commonwealth-Legislation</a>  <a href="http://www.ilga.gov/legislation/publicacts/pubact92/acts/92-0117.html">www.ilga.gov/legislation/publicacts/pubact92/acts/92-0117.html</a></p>	<p><a href="#">Illinois Public Act 92-0117</a></p>
<p><i>What types of documentation would be acceptable to confirm that someone was exempt from registering for Selective Service?</i></p>	<p>If a male immigrant can show proof that he first entered the U.S. when he was past registration age, he is not required to be registered, and no status information letter is needed. The student’s entry documentation is enough to show whether he was required to register.</p>	

	<p>You should only ask the student to request and provide a status information letter from the Selective Service to document an exemption from the requirement to register <b>if it is not clear</b> that he is exempt.</p> <p>For information on exemptions and acceptable documentation, visit: <a href="http://www.sss.gov">www.sss.gov</a>.</p>	
<p><i>Would it be acceptable to collect a signed statement from all students who have completed an Alternative Application regarding the status of their Selective Service registration?</i></p>	<p>Because the Alternative Application does not collect (or verify) information about Selective Service registration and does not provide information to schools about gender, colleges will either need to have a process in place to identify which students are required to register or to implement a process that applies generally to all Alternative Application students, such as collecting a signed statement regarding Selective Service.</p> <p>For example, you could create a form that:</p> <ul style="list-style-type: none"> <li>• summarizes the Selective Service requirements,</li> <li>• allows students to check their status and/or indicate that they don't believe they are required to register, including an option to indicate if a student is female, and</li> <li>• requires students to sign a statement certifying they understand the requirements and have provided accurate information regarding their status.</li> </ul> <p>The signed statement could then serve as the documentation needed to verify Selective Service status.</p>	
<p><i>If an undocumented male student does not turn 18 until after he completes the Alternative Application, does he still have to provide proof of registration with Selective Service for the 2020-21 award year to be eligible to receive MAP?</i></p>	<p>Since the Alternative Application is modeled after the FAFSA and ISAC relies on federal guidance as much as possible, colleges would be expected to follow ED guidance and manage this situation in the same manner that you are doing for FAFSA applicants, and in accordance with your current policies and procedures.</p> <p>According to the FSA Handbook (Volume 1, Chapter 5), male students who are not yet 18 at the time of completing their application are exempt from the Selective Service registration requirement and are not required to update their application during the award year after they turn 18. To remain consistent with ED guidance, a male student who was not 18 when completing the 2020-21</p>	<p><a href="http://ifap.ed.gov/federal-student-aid-handbook/2021FSAHbkVol1">ifap.ed.gov/federal-student-aid-handbook/2021FSAHbkVol1</a></p> <p>From the 2020-21 FSA Handbook, Volume 1 - Student Eligibility, Chapter 5: Selective Service, page 1-95:</p> <p><b>EXEMPTIONS</b></p> <p>Males exempted from the requirement to register include:</p>

	<p>Alternative Application would not have to provide proof of registration for the 2020-21 award year.</p> <p>However, keep in mind that students completing the FAFSA have the option to request that they be registered for Selective Service automatically when they turn 18, since the exemption is only a temporary one. Students completing the Alternative Application do not have that automatic registration option, so colleges will need to confirm in a subsequent award year that those students who are required to register for Selective Service have done so.</p> <p>In general, it's good practice to inform students of the registration requirements and to encourage them to register in a timely manner so that they are not negatively impacted in the future for failure to register.</p>	<ul style="list-style-type: none"> <li>Males who are not yet 18 at the time that they complete their applications (an update is not required during the year, even if a student turns 18 after completing the application)</li> </ul>
<b>Confirming MAP Eligibility - No Student Loan Default</b>		
<p><i>Since there is not a database match with the National Student Loan Data System (NSLDS) to confirm that a student does not have a student loan in default, are Alternative Application students exempt from this requirement?</i></p>	<p>While these students are not exempt from this MAP eligibility requirement, keep in mind that undocumented students would not be able to obtain a federal student loan without a Social Security Number.</p> <p>Transgender students who may have an SSN are asked to provide it in the pre-screening questions so that ISAC can determine if the student has received MAP in the past and if the student is in default on an ISAC-guaranteed student loan.</p> <p>If, in the process of importing and/or reviewing Alternative Application Student Records in your student information systems, you are able to determine that a student does have a loan in default, the student would not be eligible to receive MAP benefits until the default was resolved according to the specifications provided in ISAC rules.</p>	<p><a href="#">ISAC General Provisions</a>, Section 2700.40 General Applicant Eligibility Requirements</p>
<b>Conflicting Information</b>		
<p><i>Can MAP still be disbursed if verification is not completed or conflicting</i></p>	<p>ISAC rules allow a student to receive a first term award while verification and/or conflicting information is being resolved, but it must be resolved before the second term payment can be requested.</p>	<p><a href="#">ISAC General Provisions</a>, Section 2700.50 Determining Applicant Eligibility</p>

<p><i>information has not been resolved?</i></p>		<p>i) Institutions may request first term payment even though verification is not yet complete. If, after verification, an ISAC payment adjustment is appropriate, institutions must submit the appropriate refund. If verification is not completed within 60 days after the conclusion of the regular school year, the institution shall return the first term payment to ISAC. For other than the first term of eligibility in an academic year, the verification process must be completed before the institution may request payment.</p>
<p><i>Since students who complete the 2020-21 Alternative Application are not subject to being selected by ISAC for verification as FAFSA applicants are, is there an expectation for colleges to verify data from students and families to ensure that the EFC is correct?</i></p>	<p>Colleges are expected to verify data used to calculate a student’s EFC on an Alternative Application if there is conflicting information and/or if there is a reason to question the accuracy or completeness of the information provided.</p>	<p><a href="#">ISAC General Provisions</a>, Section 2700.50 Determining Applicant Eligibility</p>
<p><i>How should schools address situations where it appears that parents were required to file taxes, but indicated on the Alternative Application that they had not filed? FAFSA applicants in similar situations would not be able to receive financial aid/MAP until taxes had been filed, so does that same rule apply to students who have</i></p>	<p>Because income and asset data is critical to calculating an EFC and, subsequently, a MAP award, it is important that accurate data is used on the application. If a college is aware of conflicting information and/or has reason to believe that the EFC may not be accurate because the parents did not file taxes when required to do so, then the college would need to work with the parents in the same manner that they would with a student who completed a FAFSA and their parents did not file taxes when required to do so.</p> <p>There is an interactive tool on the IRS website that colleges can direct parents to which can help them understand the reasons to file and the process: <a href="https://www.irs.gov/help/ita/do-i-need-to-file-a-tax-return">https://www.irs.gov/help/ita/do-i-need-to-file-a-tax-return</a>.</p>	

<i>completed an Alternative Application?</i>	Colleges will need to determine, according to their policies and procedure and the individual student situation, the best way to proceed to resolve conflicting information and ensure that MAP is awarded on accurate application data.	
<b>Correcting data</b>		
<i>What type of changes can a student make to the Alternative Application once it's been submitted?</i>	<p>Any of the data elements on the application, except the ISAC-assigned ID number, can be corrected or updated. However, in general, a student should not update information that was correct as of the date it was initially signed and submitted. Like the FAFSA, it is considered to be a “snapshot” of the family’s financial situation as of that date.</p> <p>All corrections, including changing or adding school choices, will require the student to re-sign the application. If changes are made to parent data, the parent will need to re-sign the app as well. Both the student and the parent should use the same PIN provided to them in the initial application process.</p> <p>Each time a correction or update is made, a new transaction will be generated.</p>	
<b>Professional Judgment</b>		
<i>Are students who have completed an Alternative Application subject to the same rules and guidance regarding professional judgment as a FAFSA applicant?</i>	Yes. Colleges may rely on the same policies and procedures they may already have in place for FAFSA applicants who have special circumstances.	
<i>How should a dependency override be processed for a student who has completed an Alternative Application?</i>	Because the 2020-21 Alternative Application process does not allow financial aid administrators to make adjustments to a student’s application, a dependency override will be processed by ISAC in response to a request submitted by a school.	

	<p>After following the college’s usual policies and procedures for determining if a dependency override is appropriate, a request for the override should be submitted in an e-mail to ISAC’s School Services Department.</p> <p>A <a href="#">template</a> for schools to use for the override request is available in the FAA section of <a href="http://isac.org">isac.org</a>, on the <a href="#">MAP Application Procedures</a> page in the Gift Assistance area. Do not include any other documentation you may have collected to make your dependency override determination; those records should be retained in the student’s file.</p> <p>ISAC’s School Services Department e-mail address is: <b><a href="mailto:isac.schoolservices@illinois.gov">isac.schoolservices@illinois.gov</a></b>.</p> <p>When Alternative Applications from dependent students are submitted without parent data, an EFC will not be calculated and MAP eligibility cannot be determined. After a dependency override is processed, an EFC will be calculated and a new transaction will be generated in the MAP system. Eligibility for a MAP award will then be determined based on the student's independent status.</p>	
<p><i>What is the process for making a professional judgment adjustment to an EFC for Alternative Application applicants?</i></p>	<p>Because the 2020-21 Alternative Application process does not allow for financial aid administrators to make adjustments to application data, FAAs will need to work closely with the student and provide guidance on how to update the Alternative Application data to adjust the EFC.</p> <p>Colleges should retain signed, detailed documentation in the student’s file on both the reason(s) for the professional judgment and the changes/updates that were made.</p>	
<p><b>ISAC Identification (ID) Numbers</b></p>		
<p><i>Will a student’s ISAC-issued ID number change each year?</i></p>	<p>No. Once a student has been issued an ISAC Identification (ID) number, it will remain the same for a student from one year to the next.</p> <p><b>Please note:</b> A small group of early applicants received new ID numbers due to a change in the methodology used to assign ID numbers shortly after the 2020-21 application was launched so that, moving forward, they will be consistent with</p>	

	<p><i>the updated methodology (using zeroes in the 4<sup>th</sup> and 5<sup>th</sup> field of the number; for example, xxx-00-xxxx). See below for more information on how to identify those.</i></p>	
<p><i>Why did some students see a change to their ISAC ID number and how can schools determine if the student has a new number?</i></p>	<p>Shortly after the January 2020 implementation of the Alternative Application for Illinois Financial Aid, ISAC made a change to the methodology used to assign an ISAC identification (ID) number to students who created an Alternative Application profile. In preparation for year two (2021-22) of the Alternative Application process, a small group of ID numbers were updated for students who submitted an application prior to the change so that their ID numbers are consistent with the updated methodology (using zeroes in the 4<sup>th</sup> and 5<sup>th</sup> field of the ISAC ID number; for example, xxx-00-xxxx).</p> <p>In general, once a student has been issued an ISAC ID number, it will remain the same for the student from one year to the next; however, this small, initial group of students was assigned new numbers for future use.</p> <p>Updates to the numbers were implemented by ISAC in August 2020, and notification to impacted students will be provided to them the next time that they access the Alternative Application using their student profile information (in either 2020-21 or 2021-22). Applicants will receive a one-time notification of the change and will be required to acknowledge receipt of the notification before they can proceed to the application.</p> <p>All schools that were listed as a school choice on the student’s application will see a new transaction reflecting the updated ID number. Schools will be able to identify impacted students using flags provided on the Alternative Application Student Record, which are the same type of indicators that schools receive on an a federal Institutional Student Information Record (ISIR) that had an SSN change:</p> <ul style="list-style-type: none"> <li>• A new transaction will be generated</li> <li>• The CPS Pushed ISIR Flag field will be populated with “Yes”</li> <li>• The Student Last Name or SSN Change Flag field will be populated with “Yes”</li> </ul> <p>Below is an excerpt from the Alternative Application Student Record File Layout document highlighting the field numbers where the correction flag indicators will be provided:</p>	<p>The <a href="#">Alternative Application Student Record File Layout</a> document can be found in the <a href="#">Electronic Tools</a> section of the <a href="#">E-Library</a> at <a href="http://www.isac.org">www.isac.org</a>.</p> <p>The free app <i>Notepad++</i> is a recommended option for viewing the Alternative Application student records in a easier-to-use format.</p>

1375	1376	225	Application Data Source and Type Code	Yes	
1377	1384	226	Application Receipt Date	Yes	
1385	1385	227	Address Only Change Flag	Yes	
1386	1386	228	CPS Pushed ISIR Flag	Yes	Y = ISAC Pushed Transaction
1387	1387	229	EFC Change Flag	Yes	
1388	1388	230	Student Last Name or SSN Change Flag	Yes	
1389	1389	231	Reject Status Change Flag	Blank	
1390	1390	232	SAR C Change Flag	Blank	
1391	1391	233	Verification Selection Change Flag	Blank	
1392	1394	234	Compute Number	Blank	

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