## 2024-25 Operational Guide for Alternative Application Processing

Issue	Guidance	Regulatory/Rule Reference/Resources	
RISE Act Eligibility			
If a student completed a FAFSA but did not pass the database match checks, can they complete an Alternative Application?	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.  If the student completed a FAFSA in error and meets all the criteria specified by the RISE Act, the student may complete the Alternative Application.	Illinois <u>Public Act 101-0021</u>	
For students who have filed both a FAFSA and an Alternative Application, is the school responsible to compare and resolve conflicting data?	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.  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.  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.  Schools are not expected to check all Alternative Applications to see if those students have also submitted a FAFSA. However, as part of the payment claim and reconciliation process for MAP recipients, schools are expected to review results to ensure that a student does not receive a MAP award as both a FAFSA and an Alternative Application applicant in the same term.	ISAC Administrative Rules - General Provisions, Section 2700.50 Determining Applicant Eligibility	
How can schools ensure that a student isn't receiving MAP as both a FAFSA applicant	While colleges are not expected to check all Alternative Applications to see if a FAFSA has been filed by the same student, colleges are expected to ensure that students are not being paid MAP under both applications. At the school level this may best be accomplished by reviewing MAP reports and identifying students with	ISAC.SchoolServices@illinois.gov	

and an Alternative Application applicant?	the same name, address, date of birth and/or other identifiers that would be unique to a student.	
	In general, if a student is eligible to receive MAP benefits as the result of having a valid FAFSA/ISIR on file, the student should not receive MAP as an applicant through the Alternative Application process. The intent of the RISE Act is for students who are ineligible for federal student aid and are unable to file a FAFSA to apply for MAP using the Alternative Application; students eligible to file a FAFSA should continue to do so from one year to the next, and not change back and forth. The Alternative Application is not intended as a way to circumvent the federal FAFSA process for applicants who have student eligibility issues such as being in default, owing a refund on a federal grant, having a Social Security Number issue, etc.	
	Colleges may see a Disqualify Code of "9" in the MAP system in GAP Access when ISAC is able to identify that a student has received MAP benefits as a FAFSA applicant and then has subsequently submitted an Alternative Application for another award year. Records with the Disqualify 9 Code will display the yellow lightbulb icon (indicating a student eligibility issue) on the Student List View screen and the Disqualify Code will be highlighted on the Student Detail screen.	
	Colleges may contact ISAC's School Services Department at <a href="ISAC.SchoolServices@illinois.gov">ISAC.SchoolServices@illinois.gov</a> to have the Disqualify 9 Code removed if the college determines that the Alternative Application is the best application process for the student.	
	Additionally, if colleges notice that a student has submitted two (or more) different Alternative Applications and has multiple ISAC ID numbers, they are encouraged to work with the student to determine which application record/ISAC ID is the valid one on which MAP awarding should be done and to contact ISAC's School Services Department for guidance on getting the records synced so that the student will only have one Student Profile, ISAC ID number and Alternative Application record in the MAP system moving forward.	
Are there scenarios when it would be acceptable for a student to file a FAFSA after submitting an Alternative	In general, a student should not complete both applications, however, if the student filed an Alternative Application, but then becomes eligible for federal aid during the award year, it would be acceptable to file a FAFSA for the same award year.	

Application for the same award year?	Additionally, as part of the payment claim and reconciliation process, schools are expected to review all results to ensure that a student does not receive a MAP award as both a FAFSA and an Alternative Application in the same term in the award year.	
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?	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.  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 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.	Public Act 101-0021  Alternative Application for Illinois Financial Aid FAQs
MAP Eligibility		
Whose responsibility is it to confirm that the student is eligible for MAP?	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 (MAP) sections.	ISAC Administrative Rules - General Provisions, Section 2700.50 Determining Applicant Eligibility
	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.	a) The evaluation of applicant eligibility is the responsibility of both ISAC and the institution.
Certifying MAP Eligibility – Illinois Residency		
What are the MAP residency requirements for students who are eligible to complete the Alternative Application?	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:	Public Act 101-0021  ISAC Administrative Rules - General Provisions, Section 2700.20 Definitions and Section 2700.50 Determining Applicant Eligibility

	<ul> <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 Alternative Application for Illinois Financial Aid, physically resides within the State of Illinois, and Illinois is the parent's 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 their true, fixed and permanent home.</li> </ul>	
What if undocumented students and/or parents are unable to provide acceptable documentation to confirm residency?	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.  Additionally, an institution is not required to collect documentation to confirm residency if:  • The applicant received payment of a MAP award during the previous academic year, or  • 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.  Colleges are expected to use the same policies and procedures for students who have completed the Alternative Application to confirm Illinois residency as they use for students who have completed a FAFSA.  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.	ISAC Administrative Rules - General Provisions, Section 2700.20 Definitions and Section 2700.50 Determining Applicant Eligibility  Illinois Residency and Verification FAQs - Partner Training page in the E-Library at isac.org
Confirming MAP Eligibility - No Student Loan Default		

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?	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 (SSN).  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.	ISAC Administrative Rules - General Provisions, Section 2700.40 General Applicant Eligibility Requirements
Conflicting Information		
Can MAP still be disbursed if conflicting information has not been resolved?	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.	ISAC Administrative Rules - General Provisions, Section 2700.50 Determining Applicant Eligibility
	From ISAC Administrative Rules:  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.	
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	Because income and asset data is critical to calculating an SAI (Student Aid Index) 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 SAI 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.	
to receive financial aid/MAP until taxes had been filed, so does that same rule apply to students who have	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> .	

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completed an Alternative Application?	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.	
Correcting Application Data		
What type of changes can a student make to the Alternative Application once it's been submitted?	Any of the data elements on the application, except the ISAC-assigned ID number, can be corrected or updated by the student. 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 student's and family's financial situation as of that date.  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 application as well. Both the student and the parent should use the original PIN provided to them in the initial application process. If the student and/or parent is unable to locate an original PIN, a process is available on the signature screens to allow the users to request a new PIN. If a new PIN is requested, it replaces the previous one and the new PIN should be used for all transactions moving forward.	
What if a student makes a change to the e-mail address on their application? Does that automatically update the username and login information for their application?	If a student updates the e-mail address in Section 1 of the Alternative Application, the e-mail address the student provided when creating the Student Profile Account is not automatically updated.  The e-mail address provided when creating the Student Profile is pre-populated on the application, and if a change is made when completing Section 1 of the application, the student will still need to use the Student Profile e-mail address to log back into the application for future updates or corrections, or to start an application in a subsequent year.  When a student updates his or her e-mail address in Section 1 of the application, ISAC recommends that the student also update the e-mail address on their Student Profile, and the Alternative Application User Guide and the Accessing &	See the Alternative Application User Guide and the Accessing & Updating Your Alternative Application Student Profile resources for more information on username, passwords and making corrections to the Alternative Application

<u>Updating Your Alternative Application Student Profile</u> resources provide guidance on how to do that.

While this is not required, it may help avoid confusion should the student need to log back in to the application at a later time, and it will ensure that all communication about the application is directed to the same e-mail address.

The e-mail address that is provided in Section 1 of the Alternative Application is the e-mail address that the student's Personal Identification Number (PIN) will be sent to, is the e-mail address that the college will see on the student application record, and is the e-mail address that ISAC may use to communicate with the student in the future.

When creating an Alternative Application Student Profile and completing the application, students are encouraged to use a permanent, personal e-mail address (such as gmail, yahoo, or hotmail) rather than a school provided e-mail address that could potentially change if they change schools.

Can financial aid administrators make corrections to a student's Alternative Application record? Yes. There is a process in the MAP system in the GAP Access portal that provides colleges with the ability to make corrections and submit professional judgment adjustments for students who have submitted an Alternative Application.

Professional Judgment and Application Correction tabs are available on the Student Detail: Eligibility screen in the MAP system that allows colleges to access a student's Alternative Application record and update most of the information on the application, with the exception of the following data elements: ISAC ID Number, student e-mail address, parent e-mail address, and school choices/codes.

During the update process, messaging will appear if data is removed from a required data field, and the user will not be able to proceed to the next page until required information has been entered.

Once all changes have been entered, you must select a "Submit" button to complete the update process. If updated data is not submitted at the time of entry, all changes will be lost; changes cannot be saved to be submitted at a later time.

Updates will be processed nightly and results will be available on the following business day.

ISAC will only process one correction/update in a business day, so both the college and the student cannot make corrections or updates on the same day.

Students will be notified by ISAC via e-mail whenever an update is made to their application.

For transactions that are generated as the result of a professional judgment adjustment, an indicator will be provided on the Student Detail screen.

What are the steps for making a correction to an Alternative Application record in the MAP system?

- Log in to the MAP system in the GAP Access portal.
- Select the appropriate academic year on the MAP system home screen.
- Navigate to the Student Detail screen by entering the student's ISAC ID number in the SSN field on the MAP home screen.
  - o Or, from the *Student List* screen, select the *Student Detail* icon to navigate to the *Student Detail* screen.
    - If unsure of a student's ISAC ID number, use the Filter function to filter by the student's name.
- If there is more than one transaction for the student, be sure to identify which transaction you want to be the basis for the correction process.
- On the *Student Detail: Eligibility* screen, select the *Application Correction* tab and begin the process of updating the application.
  - When making a Professional Judgment adjustment, the option to perform a dependency override is associated with Section 3 of the application where you will have the option to provide/update parental data or continue with a dependency override.
- Review all changes and click on the Submit button to complete the correction/update process.
- Review the new transaction on the next business day to ensure corrections/updates processed as expected.

## Reminders:

- GAP Access users must have the appropriate level of access to make updates in the MAP System.
  - Access is granted and update by the college's GAP Access Administrator(s).

For additional assistance on accessing and navigating the MAP system, see the MAP User Guides:

- Student Eligibility
- Payment (includes the MAP Payment Results, Reject Reasons, Late and Disqualify codes)

For assistance on activating and managing GAP Access users, see the <u>GAP Access User Guides</u> for step-by-step instructions.

See the <u>2023-24 Alternative Application</u>
<u>Student Record School File Layout</u> in the
<u>Electronic Tools</u> section of the E-Library for information on the data elements provided on student record files.

	<ul> <li>The MAP system is available each day from 7 a.m. to 10 p.m. (CT).</li> <li>For students who have completed a FAFSA, colleges should follow the usual process of making corrections/adjustments through the U.S. Department of Education's process.</li> </ul>	
Professional Judgment		
Are students who have completed an Alternative Application subject to the same rules and guidance regarding professional judgment as a FAFSA applicant?	Yes. Colleges may rely on the same policies and procedures they may already have in place for FAFSA applicants who have special circumstances.	
Can a financial aid administrator make a professional judgment adjustment to a student's Alternative Application record, or does it have to be submitted to ISAC?	A process is available in the MAP system of the GAP Access portal that provides colleges with the ability to make corrections and submit professional judgment adjustments to Alternative Applications.  **Professional Judgment** and Application Correction** tabs are available on the Student Detail: Eligibility screen in the MAP system that will allow colleges to access a student's Alternative Application record and update most of the information on the application, with the exception of the following data elements: ISAC ID Number, student e-mail address, parent e-mail address, and school choices/codes.  When making a Professional Judgment adjustment, the option to perform a dependency override is associated with Section 3 of the application where you will have the option to provide/update parental data or continue with a dependency override.  During the update process, messaging will appear if data is removed from a required data field, and the user will not be able to proceed to the next page until required information has been entered.  Once all changes/updates have been entered, you must select a "Submit" button to complete the process. If updated data is not submitted at the time of entry, all changes will be lost; they cannot be saved to be submitted at a later time.	

Updates will be processed nightly and results will be available on the following business day.

ISAC will only process one correction/update in a business day, so both the college and the student cannot make corrections or updates on the same day.

Students will be notified by ISAC via e-mail whenever an update is made to their application.

For transactions that are generated as the result of a professional judgment adjustment, an indicator will be provided on the *Student Detail* screen.

Colleges should follow their usual policies and procedures for determining if a professional judgment determination is appropriate for a student. Information regarding the justification for a dependency override or SAI adjustment and supporting documentation should be retained in the student's file and does not need to be submitted to ISAC.

What are the steps for making a professional judgment adjustment to an Alternative Application record in the MAP system?

- Log in to the MAP system in the GAP Access portal.
- Select the appropriate academic year on the MAP system home screen.
- Navigate to the Student Detail screen by entering the student's ISAC ID number in the SSN field on the MAP home screen.
  - Or, from the Student List screen, select the Student Detail icon to navigate to the Student Detail screen.
    - If unsure of a student's ISAC ID number, use the Filter function to filter by the student's name.
- If there is more than one transaction for the student, be sure to identify which transaction you want to be the basis for the professional judgment.
- On the *Student Detail: Eligibility* screen, select the *Professional Judgment* tab and begin the process of updating the application.
  - When making a Professional Judgment adjustment, the option to perform a dependency override is associated with Section 3 of the application where you will have the option to provide/update parental data or continue with a dependency override.
- Review all changes and click on the Submit button to complete the process.
- Review the new transaction on the next business day to ensure corrections/updates processed as expected.

For additional assistance on accessing and navigating the MAP system, see the MAP User Guides:

- o Student Eligibility
- Payment (includes the MAP Payment Results, Reject Reasons, Late and Disqualify codes)

For assistance on activating and managing GAP Access users, see the <u>GAP Access User</u> <u>Guides</u> for step-by-step instructions.

See the <u>2023-24 Alternative Application</u>
<u>Student Record School File Layout</u> in the <u>Electronic Tools</u> section of the E-Library for information on the data elements provided on student record files.

	<ul> <li>Reminders:</li> <li>GAP Access users must have the appropriate level of access to make updates in the MAP System.         <ul> <li>Access is granted and update by the college's GAP Access Administrator(s).</li> </ul> </li> <li>The MAP system is available each day from 7 a.m. to 10 p.m. (CT).</li> <li>For students who have completed a FAFSA, colleges should follow the usual process of making adjustments through the U.S. Department of Education's process.</li> </ul>	
ISAC Identification (ID) Numbers		
Will a student's ISAC ID number change each year?	No. Once a student has been an issued an ISAC Identification (ID) number, it will remain the same for a student from one year to the next.  *Please note: 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. Once that was completed and moving forward all ISAC IDs are issued using the same numbering methodology, which uses 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 ISAC IDs in GAP Access.	
Why did some students see a change to their ISAC ID number and how can schools determine if the student has a new number?	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).  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.	The 2023-24 Alternative Application Student Record School File Layout document can be found in the Electronic Tools section of the E-Library at www.isac.org.  The free app Notepad++ is a recommended option for viewing the Alternative Application student records in a easier-to- use format.

Updates to the numbers were implemented by ISAC in August 2020. Those applicants received a one-time notification of the change and were required to acknowledge receipt of the notification before they could log in again as a returning applicant to make updates to an existing application or to start a renewal application.

Schools were 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:

- A new transaction will be generated
- The CPS Pushed ISIR Flag field will be populated with "Yes"
- The Student Last Name or SSN Change Flag field will be populated with "Yes"

Below is an excerpt from the Alternative Application Student Record File Layout document highlighting the field numbers where the correction flag indicators were provided:

			1 III WI		I
1375	1376	225	Application Data Source and Type Code	Yes	
1377	1384	226	Application Receipt Date	Yes	
1385	1385	227	Address Only Change Flag	Vac	
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	

Please note: The free app *Notepad++* is a recommended option for viewing Alternative Application Student Record files in a easier-to-use format.

If I don't know a student's
ISAC ID number, how can I
look the student up in GAP
Access to see if the student
has completed an Alternative
Application and is eligible for
MAP?

If the student has successfully submitted an Alternative Application to ISAC and included your school on the list of school choices, you will be able to access the student's record in the MAP system in GAP Access.

One of the easiest ways to search for a student if you don't know the ISAC ID number is to use the Filter function in the MAP system and filter on the student's first and last name. After entering the filter criteria, return to the Student List view and check to see if the student is listed.

See the MAP Eligibility User Guide for more information on GAP Access functionality.

	If the student is on the filtered list, you will find eligibility information on the Student List and on the Student Detail screen, and the ISAC ID number can be found in the SSN field.	
Managing Alternative Application Student Records in GAP Access		
What if a student says he completed the Alternative Application but I'm not able to find his Alternative Application record on the Student List in GAP Access.	It may be that the student answered a question on the Alternative Application that would prevent the student from being listed on the default view of the student list in the MAP system in GAP Access, such as indicating that the student is a "graduate student."  In the default view in the MAP system, schools will not see graduate students (Disqualify Code 4) on the student list, nor can they access graduate students by using the SSN/ISAC ID search function. To see these students, you must use the Filter function and choose the option to filter for graduate students only.  If you determine that a student is not a graduate student and has answered an Alternative Application question incorrectly, the student will need to make a correction to the application so that they can be considered for MAP.	See the MAP Eligibility User Guide for more information on the Filter and Sort functionality in GAP Access.  isac.org/isac-gift-assistance-programs/map/applying-for-map/2023-24-critical-data.html
Is there a quick way to identify Alternative Application students in GAP Access?	Schools can run the MAP Eligibility Report under the "Reports" tab in the MAP System in GAP Access.  Select the "Create New Report" button and select the "MAP Eligibility Report".  Under the "Applicant" section request the report for "Alternative Applications." Once the report has been requested it will be available in the report list and you will have the option to open it in Word or Excel format.  Another option is to sort on the Social Security Number (SSN) Match Flag field in the MAP system in GAP Access. Because a database match with the Social Security Administration is not done for students who completed the Alternative Application, there will not be a value in the SSN Match Flag field; the field will be blank. FAFSA applicants will have a value in the SSN Match Flag field.	See the MAP Eligibility User Guide for more information on the Sort functionality in GAP Access.

- On the Columns screen, add the SSN Match Flag field to the Selected list so that it will appear as a column on your student list view, then move it to the top of the Selected list.
  On the Sort screen add the SSN Match Flag field to the Selected list of fields on which you want to sort, and then move it to top of the list.
- When you return to the sorted student list, all student records with a blank SSN Match Flag field will be grouped together at the end of the list.
- There is an option to export the student list into Excel by clicking on Excel Report on the bottom of the Student List. In the Excel file, you can Filter the students by SSN Match Flag.

What if a student has submitted two Alternative Applications? Which one should the school use to award MAP? If colleges identify situations where a student has submitted more than one Alternative Application for an award year and, as a result, has been issued more than one ISAC ID number, schools are asked to email ISAC's School Services Department at ISAC.SchoolServices@illinois.gov to report the duplicate record(s).

Maintaining just one student profile, ISAC ID number, and Alternative Application student record is important to ensuring that MAP Paid Credits Hours are assessed properly and that a student is not over-awarded.

School Services will provide guidance to the school on how to resolve the situation so that the duplicate record(s) can be removed (similarly to how an ISAC Conflict indicator is resolved for a student who has submitted a FAFSA). This will require the school to work with the student to identify which profile/record is the correct one to use moving forward, and the other(s) will be removed from the MAP system in GAP Access.

ISAC has an internal process to look for duplicate records on a regular basis and flag these issues in GAP Access, however, assistance from schools will also be needed to help determine which record is the valid application for awarding and tracking purposes.