



# Unusual Enrollment History

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## Agenda

- Unusual Enrollment History (UEH)
- Overview
- Current
- Resolution
- Operations
- New

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## Unusual Enrollment History (UEH)

- Beginning with the 2013-14 award year, the Department added an Unusual Enrollment History (UEH) flag that indicates that a student has an unusual enrollment history based on the receipt of Federal Pell Grant (Pell Grant) funds
- We added the flag to address possible fraud and abuse in the title IV student aid programs
- We are concerned about an enrollment pattern in which a student attends an institution
  - long enough to receive title IV credit balance funds,
  - leaves without completing the enrollment period,
  - enrolls at another institution, and
  - repeats the pattern of remaining just long enough to collect another title IV credit balance without having earned any academic credit

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## UEH – Overview

- Some students who have an unusual enrollment history have legitimate reasons for their enrollment at multiple institutions
- However, such an enrollment history requires a review to determine whether there are valid reasons for the unusual enrollment history
- Resolution of a UEH flag is separate and distinct from verification

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## UEH – Current

- For 2014-15, Pell Grant disbursement information was evaluated for the past three award years
- FAFSA filers were assigned a UEH Flag of 'N,' '2' or '3', based on the number of Pell Grant disbursements that a filer received compared to the number of schools that the individual attended

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## UEH – Current

- A UEH Flag value of 'N' indicates that there is no unusual enrollment history issue and, thus, no 'C' Code, no comments, and no action required by the institution
- A UEH Flag with a value of '2' indicates an unusual enrollment history that requires review by the institution of the student's enrollment records
  - An example of an enrollment pattern that generates a UEH Flag value of '2' would be when the student received Pell Grant funds at three institutions over two award years

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## UEH – Current

- A UEH Flag with a value of '3' indicates that the institution must review academic records for the student and, in some instances, must collect additional documentation from the student
  - An example of an enrollment pattern that generates a UEH flag value of '3' would be when the student received Pell Grant funds at three or more institutions in one award year
- Note that there is no UEH flag value of '1'

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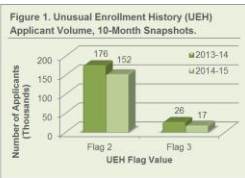
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## UEH – Overview Data

- During the 2013-14 application cycle, 1.0% of applications were flagged for having an Unusual Enrollment History (UEH)
- To date for the 2014-15 cycle, that figure sits at 0.9%
- Among other factors, this could be due to a reduction in application rates from those that applied and were flagged in 2013-14

UEH Value	2013-14 Cycle 16-Month Total	
	Number	Percentage
Flag 2	185,413	0.9%
Flag 3	27,986	0.1%
No Flag	20,980,354	99.0%
<b>Total</b>	<b>21,193,753</b>	<b>100.0%</b>




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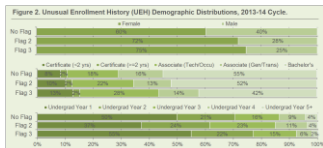
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## UEH – Demographic Data



- Those that are overrepresented among applicants with UEH include females and those pursuing a technical/occupational associate degree
- A large percentage of those flagged report having a freshmen grade level

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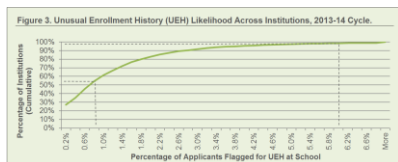
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## UEH – Institutional Impact Data



- On average, first-reported institutions on the FAFSA see about 1.1% of their applicants flagged for UEH. However, there is some variation:
  - 54% of schools have seen 0.8% of applicants flagged
  - Virtually all schools (99%) had no more 6.0% of applicants flagged



## UEH – Outcome Data

Table 2. Unusual Enrollment History (UEH) Disbursement Rates Among Applicants that were Previous Recipients, 2013-14.

UEH Value	Applicants (Previous Recipients)	New grant from new school	New grant from previous school	New grant from any school	Disbursement Rate
Flag 2	185,413	22,869	95,918	118,587	64%
Flag 3	27,388	3,912	9,416	13,328	48%
No Flag	8,672,626	1,265,361	4,328,347	5,541,628	64%
Total	8,885,029	1,291,962	4,441,681	5,673,543	64%

- The disbursement rate among applicants that had been aid recipients in previous years (though not flagged for UEH in the 2013/14 cycle) sits at 64%
- Applicants in the 2013/14 cycle with a UEH value of "Flag 2" saw similar disbursement rates (64%). Those with "Flag 3" saw FAAs disbursing aid at a much lower rate (48%)



## UEH – Resolution

- Resolving Unusual Enrollment History Flags
  - UEH Flag value is 'N': No action is necessary as the student's enrollment pattern does not appear to be unusual
  - UEH Flag value is '2': The institution must review the student's enrollment and financial aid records to determine if, during the three award year review period (Award Years 2011-2012, 2012-2013, and 2013-2014), the student received a Pell Grant at the institution that is performing the review
  - If so, no additional action is required unless the institution has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds
  - If not, the institution must follow the guidance that is provided for a UEH Flag of '3'



## UEH – Resolution

- Resolving Unusual Enrollment History Flags
- **UEH Flag value is '3'**: The institution must review the student's academic records to determine if the student received academic credit at the institutions the student attended during the three award year period (Award Years 2011-12, 2012-13, and 2013-14)
- Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell Grant funding over the past three award years (2011-12, 2012-13, and 2013-14)

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## UEH – Resolution

- Resolving Unusual Enrollment History Flags
- Based upon academic transcripts it may already possess, or by asking the student to provide academic transcripts or grade reports, the institution
  - Must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant funds
  - Academic credit is considered to have been earned if the academic records show that the student completed any credit hours or clock hours

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## UEH – Resolution

- Academic Credit Earned
  - If the institution determines that the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required
  - Unless the institution has other reasons to believe that the student is one who enrolls just to receive the credit balance

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## UEH – Resolution

- Academic Credit Not Earned
  - If the student did not earn academic credit at a previously attended institution and, if applicable, at the institution performing the review, the institution
    - must obtain documentation from the student explaining why the student failed to earn academic credit
    - The institution must determine whether the documentation supports
      - (1) the reasons given by the student for the student's failure to earn academic credit; and
      - (2) that the student did not enroll only to receive credit balance funds

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## UEH – Resolution

- Justification for UEH
  - Personal reasons
    - Illness, a family emergency, a change in where the student is living, and military obligations
  - Academic reasons
    - The student might explain that the first enrollment was at an institution that presented unexpected academic challenges, or
    - The academic program did not meet the student's needs, as determined by the student
- The institution should, to the extent possible, obtain third party documentation to support the student's claim

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## UEH – Eligibility after Resolution

- Approval of Continued Eligibility
  - You can establish an academic plan (ex. SAP appeal plan) and/or;
  - Counsel student on Pell Grant duration of eligibility provisions (LEU)
- Denial of Continued Eligibility
  - You must deny additional title IV aid if no academic credit was earned at one or more institutions and no documentation or acceptable explanation was provided for each failure
  - Students can appeal the denial (ex. SAP determinations)

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## UEH – Eligibility after Resolution

- Regaining Aid Eligibility
  - If aid is denied, you must give the student information on how to regain eligibility
  - Successful completion of academic credit is the basis for a student's request for renewal of eligibility
    - This can include meeting the requirements of an academic plan that you establish with the student
  - Pell Grant eligibility and campus-based aid begin with the payment period in which the student meets the eligibility requirements (following the period of ineligibility)
  - Direct Loan eligibility is retroactive to the beginning of the enrollment period

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## UEH – FAQ

- Circumstances when a student's 2013-14 ISIR included a UEH Flag of '2' or '3', but the UEH Flag value is 'N' on the student's 2014-15 ISIR
  - If you have previously resolved the 2013-14 UEH issue, there is no need for any further review
  - If you have not satisfactorily resolved the 2013-14 UEH issue, you should, but are not required to, hold disbursement of Title IV aid for 2014-15 until you resolve the earlier UEH issue
  - In doing so, you must review not only the student's academic record for the 2010-11, 2011-12, and 2012-13 award years noted in DCL GEN-13-09, but also the more recent 2013-14 award year

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## UEH – FAQ

- Circumstances where you suspect that a student for whom the Department did not assign a UEH Flag of '2' or '3' on his ISIR may be applying for and receiving Title IV aid for purposes other than to provide financial support for postsecondary education
  - In such instances, you may choose to hold disbursement of Title IV aid until you review the academic history of the student
  - In doing so, you must document the reasons why you took this action, as well as the specific steps the institution took to resolve the institutional selection for UEH review

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## UEH—New for 2015-2016

- Expanded to include prior receipt of Direct Loans
  - Not to include Direct Consolidation Loans or Parent PLUS loans
  - Does not substantially increase the number of applicants flagged
- Expanded to include prior 4 rather than 3 award years
  - For 2015-2016, UEH evaluation includes 2011-2012, 2012-2013, 2013-2014 and 2014-2015

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## UEH – Data Notes

- **UEH Data: Table 1:** Data retrieved from Central Processing System (CPS). Data based on last transaction and includes rejected applications.
- **UEH Data: Table 2:** Data for the number of applicants with Flag 2 and Flag 3 retrieved from Central Processing System (CPS). Data for disbursements and for the number of previous recipients not flagged for UEH retrieved from National Student Loan Data System (NSLDS). Data based on last transaction and includes rejected applications.
- **UEH Data: Figure 1:** Data retrieved from Central Processing System (CPS). Data based on the last transaction on file through October 31 of the first year of each application cycle and includes rejected applications.
- **UEH Data: Figure 2:** Data retrieved from Central Processing System (CPS). For gender, information is student-reported with those not reporting gender excluded from analysis. For degree pursued, information is student-reported and excludes from analysis degree types ineligible for Pell grants as well as teaching credentials. For grade, information is student reported with non-undergraduate grades excluded from analysis. Data based on last transaction and includes rejected applications.
- **UEH Data: Figure 3:** Data retrieved from Central Processing System (CPS). Information based on the first-listed postsecondary institution on the application only. Data based on last transaction and includes rejected applications.

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## UEH – Resources

- Dear Colleague Letter GEN-13-09, Published March 8, 2013, 2013-14 Award Year: Students with an Unusual Enrollment History Flag – ‘C’ Code on the ISIR
- Upcoming Dear Colleague Letter for 2015-2016
- 2014-2015 ISIR Guide
- 2015-2016 ISIR Guide

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## Contact Information

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## QUESTIONS?



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