

Unusual Enrollment Pattern

Recently, ED announced the addition of an Unusual Enrollment History Flag (UEH Flag) to the 2013-2014 Institutional Student Information Record (ISIR). In [Dear Colleague Letter GEN-13-09](#), published on March 8, 2013, ED describes in more detail its efforts to prevent fraud and abuse by identifying Federal Pell Grant (Pell Grant) recipients with unusual enrollment histories, and describes actions that a school must take to resolve a UEH issue before the student can receive additional Title IV financial aid.

ISIR UEH Flag values and resolutions

ED will review Pell Grant disbursement information for the past three award years for all 2013-2014 Free Applications for Federal Student aid (FAFSA) filers. The student is then assigned a UEH Flag and a school must in some cases, take certain action, as outlined below.

UEH Flag value 'N': Indicates that there is no unusual enrollment history, therefore, there are no 'C' code comments and no action is required by the school.

UEH Flag value '2': Indicates that there is an unusual enrollment history that requires a school review of the student's records to determine if the school must collect additional information about the student's prior enrollment. An example of value '2' would be if the student received Pell Grant funds at three schools over two award years. The school must review the student's enrollment and financial aid records to determine if, during the three award year (AY) review period (AY 2010-2011, AY 2011-2012, and AY 2012-2013) the student received a Pell grant at the school that is performing the review.

If the student did receive a Pell grant at the school, no additional action is required *unless* the school has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds. In this case, the school must follow the guidance below for a UEH Flag value '3'.

UEH Flag value '3': Indicates that the school must collect and review academic records for the student and, in some instances, collect additional documentation from the student. An example of value '3' would be when the student received Pell Grant funds at three or more schools in one award year.

The school must review the student's academic records to determine if the student received academic credit at the schools the student attended during the three AY review period. The school can obtain this information from the National Student Loan Data System (NSLDS).

Based on the academic transcripts that the school may already have, or by asking the student to provide academic transcripts or grade reports, the school must determine, for each of the previously attended schools, whether academic credit was earned during each 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.

- ***Academic Credit Earned:*** If the school determines that the student earned any academic credit at each of the previously attended schools during the relevant AY review period, no further action is required unless the school has other reasons to believe that the student is one who enrolls just to receive the credit balance. In this case, the school must require the student to provide additional information, as noted below under 'Academic Credit Not Earned'.
- ***Academic Credit Not Earned:*** If the student did not earn academic credit at a previously attended school and, if applicable, at the school performing the review, the school must obtain documentation from the student explaining why the student failed to earn academic credit. The school must determine whether the documentation supports the reasons given by the student for the student's failure to earn academic credit **and** that the student did not enroll only to receive credit balance funds.

The student may present personal reasons, or academic reasons to explain the failure to earn academic credit. For example, the student could include illness, a family emergency, or that the student determined before completing any academic credit, that the academic program did not meet the student's needs. The school should, to the extent possible, obtain third party documentation to support the student's claim(s).

Similar to professional judgment, the financial aid administrator must determine whether the circumstances of the failure of the student to receive academic credit, as evidenced by the student's academic records and other documentation, support the continuation of Title IV financial assistance. These decisions are final and not appealable to ED, and the reasons for the decision must be documented and maintained in the student's file.

Approvals and denials

If the school approves the student's continued eligibility, the financial aid administrator may require the student to establish an academic plan, similar to the type of plan used to resolve satisfactory academic progress appeals. The school may also want to counsel the student about the duration of Pell Grant eligibility provisions and the impact of the student's attendance pattern on future Pell Grant eligibility.

If a student did not earn academic credit at one or more of the schools reviewed for the AY review period, and does not provide to the financial aid administrator's satisfaction, an acceptable explanation and documentation for each of those failures, the school must deny the student any additional Title IV financial aid. The student must be provided with an opportunity to question and appeal the decision, consistent with similar other financial aid determinations such as SAP and professional judgment decisions.

If the school denies a student continued Title IV financial aid, it must provide the student with information as to how the student may subsequently regain Title IV financial aid — for example the successful completion of academic credit or meeting the requirements of an academic plan established by the school with the student.

ED states that the authority for a school to deny Title IV funds in these cases stems from the Statement of Educational Purpose as part of the student's submission of the FAFSA stating that the student will only use Title IV funds to meet educational costs.

More information

For questions about the guidance provided in GEN-13-09, contact Federal Student Aid's Research and Customer Care Center Staff by phone at 1-800-433-7327, or by email at fsa.customer.support@ed.gov.