



Citizenship and Eligible Non-Citizens

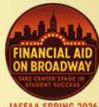
Erick Danielson, ICAN
Alyssa Dalton, University of Iowa

IASFAA Spring 2026

1

Eligibility

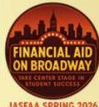
- Have a high school diploma or equivalent
- Be a U.S. citizen or eligible non-citizen
- Have a valid Social Security Number unless you are from the Republic of the Marshall Islands, Federated States of Micronesia, or Republic of Palau
- Be enrolled in an eligible degree or certificate program
- Make satisfactory academic progress (SAP)
- Sign certification statement and consent statement on the FAFSA



IASFAA SPRING 2026

2

Citizenship Eligibility	
<p>U.S. citizen or national</p> <p>Eligible noncitizen</p> <ul style="list-style-type: none"> - A U.S. permanent resident with a Permanent Resident Card (I-551) or a conditional permanent resident with a Conditional Green Card (I-551C) - Other eligible noncitizen with an Arrival-Departure Record (I-94) from the Department of Homeland Security showing any one of the following designations: "Refugee," "Asylum Granted," "Parolee" - The holder of a valid certification or eligibility letter from the Department of Health and Human Services showing a designation of "Victim of human trafficking" - A resident of the Republic of Palau, the Republic of the Marshall Islands, or the Federated States of Micronesia - A Canadian-born Native American under terms of the Jay Treaty 	<p style="text-align: right; font-size: small;">Federal Student Aid</p> <p>Neither U.S. citizen nor eligible noncitizen</p> <p>been granted Deferred Action for Childhood Arrivals (DACA);</p> <ul style="list-style-type: none"> - an F-1, F-2, or M-1 student visa; - a J-1 or J-2 exchange visitor visa; - a G series Visa (partaking in international organizations); - an A-2 or A-3 visa (foreign official, including attendants) - a NATO visa (NATO); - a B-1 or B-2 visitor visa; - an H series or L series Visa (which allow temporary employment in the U.S.); or - a U-Visa (victim of criminal activity)

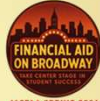


IASFAA SPRING 2026

3

Permanent Resident

- Permanent Resident Card
 - Also known as a green card
 - A document that allows a non-citizen to live and work in the United States permanently
 - The USCIS# needs to be recorded on the FAFSA
 - This number is also known as "Alien Registration Number" (ARN)



IASFAA SPRING 2026

4

Undocumented Students

- Undocumented parents can acquire a StudentAid.gov Account to contribute to student's FAFSA form
- Social Security Number for work purposes only
 - Will use SSN to verify identity
- Undocumented students, including DACA students with an SSN for work purposes only, are not eligible for Federal Student Aid
- State aid varies by state



IASFAA SPRING 2026

5

Work Permit

- Government-issued document that allows a foreign national to legally work in a specific country, essentially proving they have permission to be employed there
- This number can be used to create a StudentAid.gov account and provide contributor (parent) information on the FAFSA




IASFAA SPRING 2026

6

Undocumented Students - State Aid


- **Offering state aid:** California, Colorado, Connecticut, Hawaii, Illinois, Maryland, Massachusetts, Minnesota, Nevada, New Jersey, New Mexico, New York, Oregon, Rhode Island, Utah, Vermont, Virginia, Washington, and District of Columbia
 - DACA students with SSN can use FAFSA to apply for state grants, in applicable states
 - May have additional state aid application to complete
- **Limited access to aid:** Arizona, Arkansas, Delaware, Florida (as of 2025), Idaho, Iowa, Kansas, Kentucky, Maine, Michigan, Mississippi, Nebraska, Ohio, Oklahoma, Pennsylvania, South Dakota, Texas (as of 2025)
 - DACA students not eligible for aid
 - May or may not receive state aid, but may get institutional aid
- **Restricted or no access to aid:** Alabama, Georgia, Indiana, Missouri, New Hampshire, North Carolina, South Carolina, Tennessee, Wisconsin, Wyoming



7

Once We Get The FAFSA


- FAFSA will match with SSA records to verify U.S. Citizenship and SSN
- FPS will reject the FAFSA for insufficient info if the SSN is not provided
- If citizenship is left blank, FPS (FAFSA Processing System) will attempt the citizenship match with the SSA
 - If there is a complete match with the SSN, name, date of birth, and U.S. citizenship, FPS will confirm the student's citizenship



8

U.S. Citizen: Common Acceptable Docs


- Certificate of Naturalization (Forms N-550 or N-570) issued by USCIS and must copy to student's file
- Certificate of Citizenship (Forms N-560 or N-561) issued by USCIS
- Copy of student's birth certificate showing student was born in the U.S. or territories
- U.S. Passport and wallet-size passport card issued by Department of State (unexpired)



9

Eligible Non-Citizen Match w/ DHS


- DHS assigns an A-Number to most individuals who are not U.S. citizens. If the applicant indicated on the FAFSA 'Eligible Noncitizen' and provides an A-Number, identifying info is sent to DHS for verification.
- Verification is conducted by SAVE, an online service administered by USCIS
- Results of the match shown by match flag 'FAA Info'
 - DHS Primary Status
 - DHS Secondary Match Status
 - DHS Case Number



10

Common DHS Match Results


- Successful Match (Y Primary) -> They can receive aid if other eligibility criteria are also met
- Non-Citizens status has not yet been confirmed (N primary match status) -> proceed to third-step verification



11

Other DHS Match Results

- Record was not sent to DHS due to data entry errors(blank match status) -> match will not be attempted if the student:
 - Left A-Number blank
 - Said 'Eligible Noncitizen' but provided no A-Number (CC 022)
 - Changed their response to the citizenship question (CC 019) or changed their A-Number or citizenship status after previous verification by DHS (CC 020)
- A case has already been submitted (D primary match status) -> Check FPP to see if case assigned to prior ISIR, otherwise send [email](#).



12

A-Number Corrections and Additions

- If U.S. Citizen is selected on the FAFSA, but the student provides an eligible noncitizen document -> correct citizenship in FPP and enter the A-Number. Wait for the DHS match status on student's next ISIR. Third step may be necessary
- If the A-Number on the ISIR does not match the A-Number on student's immigration document -> correct A-Number in FPP. Do not complete third-step verification unless DHS match status on the next ISIR indicate it is necessary



13

Third-Step Verification

- If initial match result status is "N" or if you have conflicting information about immigration status/category after receiving primary match result, you must review record for third-step verification.
- Only when students have unsuccessful SSA and DHS matches, you have conflicting information, or student disagrees with the SAVE response, must you perform third-step verification using SAVE to confirm their documentation supports on of the acceptable eligible noncitizen statuses or categories.



14

Reviewing Eligible Non-Citizen Status


- 1) Request student's most current, unexpired immigration document and when the original is submitted, take a copy of it.
- 2) Carefully review the documentation against the status/category
- 3) Determine whether the student's immigration documentation support eligibility for Title IV aid. If it does not, you can tell the student they are not eligible now but may be if/when they submit appropriate documentation. You should not complete third-step verification for this student.



15

Common Eligible Non-Citizen Statuses


- Lawful Permanent Residents -> Form I-551 "green card" or I-94
- Conditional Permanent Residents -> Form I-551, I-94, I-94A
- Conditional Entrants
- Refugees
- Asylees
- Individuals paroled into U.S. for at least one year



16

Unacceptable Eligible Non-Citizen Documentation

- Social security card or driver's license
- Notice of Approval to apply for Permanent Residence Form I-171 or Form I-464) -> Cannot receive Title IV aid
- Employment authorization documents (Form I-766, EAD) alone does not support, but a student with another eligible status and employment authorization can, potentially, be eligible
- Non-Immigrant Visas -> Aren't eligible for Title IV aid unless student has Form I-94 with one endorsement given



17


Less Common Non-Citizen Documentation

<p>Eligible:</p> <ul style="list-style-type: none"> • Ukrainian citizens and nationals • Afghan citizens and nationals paroled into the U.S. between July 31, 2021, and September 30, 2023 • Cuban-Haitian Entrants • Victims of human trafficking • Battered immigrants-qualified aliens • Jay Treaty students 	<p>Not Eligible:</p> <ul style="list-style-type: none"> ○ Other Ineligible Visas <ul style="list-style-type: none"> ▪ Student and NATO Visas ▪ A-1, A-2, A-3 Visas ▪ Visitor and Exchange Visas ▪ DACA not eligible for Title IV, may be eligible for state/institutional aid ▪ H, L, or G Series Visas ▪ Temporary Protected Status (TPS) students not eligible for Title IV aid without another qualifying status/category
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

18

Documenting Immigration Status in Later Award Years

- You must document a student's immigration status/category in a subsequent award year if:
 - Student is not confirmed as an eligible noncitizen on the ISIR
 - Student is a conditional permanent resident, refugee, Cuban-Haitian entrant, or a person granted asylum
- You do **not** have to document a student's eligible noncitizen status in subsequent award years if:
 - Student is U.S. citizen or national
 - A citizen of the Freely Associated States
 - A lawful permanent resident and has Forms I-551 or I-151; or
 - An eligible noncitizen, as indicated by the SAVE response for the previous award year, the student was an eligible noncitizen and the comments supporting the status in question have not expired



19

Questions? Anything to Discuss?

If you think of situations or questions, feel free to email me:
alysa-dalton@uiowa.edu



20