Connecticut Community Colleges
Banner Financial Aid Team

Processing Aid for Undocumented Students in Banner
Effective: July 1, 2018
Last updated: November 22, 2019

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Introduction:

On April 27, 2018, the CT General Assembly passed PA No. 18-2, An Act Assisting Students without Legal Immigration Status with the Cost of College. The statute makes institutional aid derived from a percentage of tuition revenue (AKA, “set-aside” funds) available to needy students who do not meet the citizenship status requirements for federal & state financial aid. Previously, the same citizenship status rules applied to federal, state, and all institutional aid eligibility requirements.

Applicants who cannot qualify for aid due to undocumented status must complete a separate application and must meet the conditions for in-state residency per Chapter 185, Sec. 10a-29, subsection (9) of the regulations for the administration of higher education in the state of CT. Eligibility requirements and deadlines are as follows for two groups of students covered in PA 18-2:
<table>
<thead>
<tr>
<th>Honorably-discharged veterans of U.S. armed forces without legal immigration status:</th>
<th>All other students without legal immigration status:</th>
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<tbody>
<tr>
<td>• CT residency per Chapter 185, Sec. 10a-26 through 10a-30</td>
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<tr>
<td>• Aged 30 years or younger on June 15, 2012 (DOB 6/15/1982 or later)</td>
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<td>• Completed at least 2 years of high school level education in CT</td>
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<td>• Graduated from high school in CT (or equivalent)</td>
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<td>• Have not been convicted of felony in CT or any other state in the U.S.</td>
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<td>• Signed affidavit stating that they have filed an application to legalize immigration status or will file such application as soon as they are eligible to do so</td>
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Eligibility begins July 1, 2018

Eligibility begins January 1, 2020

| Were 15 years of age or younger when arrived in the U.S. and have resided continuously in U.S. ever since then. | Were 16 years of age or younger when arrived in the U.S. and have resided continuously in U.S. ever since then. |

CT Community College (CCC) students meeting the above conditions may complete an Aid Application for CT Undocumented Students (AACTUS). The AACTUS is only for undocumented students; all other students must apply for institutional (as well as federal and state) aid using the FAFSA.

CCC policy is to verify information on the AACTUS for each applicant in the same manner information would be verified for a standard CPS-selected students under the Standard Verification Tracking Flag V1. (See Verification and Resolving Conflicting Information for additional details)

After verification and eligibility review, each CCC will execute its own packaging philosophy for these funds, as they did for institutional aid before the passage of PA No. 18-2. Institutional aid may only be granted to students if they would have otherwise qualified for aid excepting their undocumented status. For example:

- All students must meet the same Satisfactory Academic Progress standards to receive aid
- Male students must register with Selective Service
- Dependent students must supply parent information
  - Dependency overrides may be possible per college policy and professional judgment
- Students and parents earning over that year’s filing threshold must file an income tax return

Note: The statute does not require that institutional grant funds equal the aid that students would have received had they had the citizenship status necessary to assess federal & state aid eligibility.
**Fund Setup in Banner:**

A separate fund code is used that mirrors much of the setup of the original college institutional grant. The colleges’ institutional funds will be split between the institutional grant for applicants having citizenship statuses consistent with Title IV eligibility, and the institutional grant for those students who will use the AACTUS because their citizenship statuses render them ineligible for evaluation for Title IV aid.

Funds will be awarded manually. Therefore this fund code should not be part of RPRGFND setup for automatic packaging.

**RFRBASE – Fund Base Data:**

Setup of the fund code xCCGIU is similar to that for the previously-setup institutional grant. The Short and Long Descriptions on RFRBASE must be exactly the same as for the typical institutional grant. All students should see awarded institutional aid as the same in Banner Self-Service as well as on any communications sent by Financial Aid. The Federal Fund ID code will be blank. Messaging should be the same.

There is one important difference with xCCGIU: The Accounts Receivable (AR) Detail Code must be xGIU. The AR codes for institutional grants relate to a single fund source in the Banner Finance system - that of institutional financial aid funds from tuition/ “set aside” dollars at each college. The Banner Finance Team has already ensured that this has occurred during the setup of the new xGIU code.

**RFRMGMT – Fund Management:**

The designated Financial Aid Administrator (FAA) will set up the xCCGIU fund for undocumented students applying via the AACTUS in much the same way as the institutional grant for students applying with the FAFSA, with a few important differences.
On the Fund tab, FAAs will enter Budget Allocations and Over Commitment Percents, keeping in mind the amounts they estimate for institutional aid for the related grant for AACTUS applicants. FAAs may need to adjust the allocations throughout the year as awarding continues, depending on the amount being awarded for each fund. Note that expenditures for institutional grant for undocumented students combined with institutional grant for other students cannot exceed total institutional set-aside funds for the year. See *Funds Management in Banner* for additional details on monitoring expenditures.

On the Packaging tab, FAAs set the maximum and minimum award amounts, rounding and disbursement settings, as well as other considerations. The funds will be awarded manually, so FAAs should NOT check the following:

- Automatic Packaging
- Reduce Need
- Needs Analysis
In the Disbursement tab of RFRMGMGT, FAAs should prorate, set Attending Hours functionality, Repeat rules, and other settings exactly as they are set for the institutional grant for students applying with the FAFSA. There are two differences. One, is the “If Selected for Verification...” field, should be set to “Y=Yes allow disbursement” for the xCCGIU fund and the other is, “Award Using Estimated EFC” should be checked off.

Delivered Banner functionality automatically reviews the verification status of the ISIR on which aid will pay. Because students applying for the AACTUS will not have a verification status since there is no ISIR in Production, FAAs must change this setting, or else aid cannot authorize and disburse.

**Application Procedure:**

Students with undocumented citizenship status must use the [Aid Application for CT Undocumented Students (AACTUS)](https://example.com) to apply for available institutional aid. They cannot use the FAFSA to apply for xCCGIU funds. Students must deliver a separate AACTUS to each community college they plan to attend. Each year, the paper AACTUS will be created by the Banner Financial Aid Team at the System Office in coordination with the financial aid offices at the CCCs to update dates and requirements as needed.

Whereas many of the questions are similar to those on the FAFSA, the AACTUS is a different application. Because CCC policy is to verify information on the AACTUS for each applicant, the AACTUS includes information typically-found on a verification worksheet. Students may also be required to attach documentation depending on their tax filing and veteran status.

**Establishing Eligibility and Need for xCCGIU in Banner (PROD):**

Upon receiving the AACTUS, the designated FAA will perform an initial review to ensure the application is complete and any required documentation included. The initial pages of the AACTUS should be reviewed right away to ensure students have certified that they may use the AACTUS to apply for
institut

For example, student with US Citizenship or Permanent Residency must apply using the FAFSA.

The full review of the AACTUS and associated documentation must be done to verify eligibility prior to any EFC calculation. Students must also have the following verified in their Banner Student records:

- CT Residency (RSISTDN)
- Enrollment in Title IV-eligible program (RSISTDN, RWVMAJR)
- Financial Aid SAP Status (ROASTAT)

Note: The “Financial Aid Checklist for Undocumented Students Applying for Institutional Aid” may help FAAs organize this information and the awarding process.

FAAs will navigate to the PROD version of Banner to type information from the AACTUS and other required documentation into RNANAx in manually. This allows an EFC calculation to be completed in PROD.

Application Evaluation Steps in PROD:

FAAs do not need to enter all AACTUS information into PROD’s RNANAx in order to calculate an EFC. To save time, enter only what is necessary. Note: If students meet criteria for an Automatic Zero EFC, skip to step 9 below.

1. In PROD, ensure that the “Source” field in RNANAx reads “Manual.”
2. In the Demographic tab of RNANAx, enter Last Name, First Name, State of Legal Residence (should be “CT”), Date of Birth (remember age limit), Social Security Number (enter zeros if none), and Marital Status (optional).
Note: Though not entering this data in RNANxx, FAAs should review carefully information on the AACTUS for address, citizenship status, marital status, or whether or not student already has a Bachelor’s degree. Note discrepancies that may require additional documentation or information that may disqualify students from receiving institutional aid.

3. No information is required on the Plans and Educational Background tab of RNANxx. Even so, FAAs should carefully review education information on the AACTUS. Note discrepancies that may require additional documentation or information that may disqualify students from receiving institutional aid.

4. In the Status tab of RNANxx, FAAs must input any “yes” answers to Dependency questions. If students have Dependent status, input Parent Marital Status, State of Legal Residence, SSN information as it is on the AACTUS (SSNs should be zero if there are none), name(s), and date(s) of birth.
5. In the Income and Assets tab of RNANAxx, input all Student data (and Parent data, for Dependent students) from the AACTUS for household size, number in college, means-tested benefits, dislocated worker status, whether an income tax return was filed, tax return form filed, filing status, 1040A/EZ eligibility, AGI, taxes paid, income from work, assets, untaxed income, or additional financial information.

Note:
- The presence of means-tested benefits (e.g., SSI, SNAP) or dislocated worker status is important. These will determine whether the Simplified Needs formula is used (excluding asset information from EFC calculation) and may qualify a student for an Auto Zero EFC.
  - If a student answers “no” to one of these questions, it is OK to leave as “None”
  - It is best practice to fill in zeros for asset information if it does not exist
  - For Untaxed Income and Additional Financial Information fields:
    - It is OK to leave fields blank if information does not exist
    - Some of the information fields were combined on the AACTUS to keep it shorter (e.g., Work-Study and Co-Op earnings). It does not matter which field FAAs choose to input that information in RNANAxx, so long as it is in the correct section.

6. Leave all fields on the IRS DRT Flags tab of RNANAxx blank.
7. On the Information Release tab of RNANAxx, update the Institutional Housing Plans field to match the living/housing status selected by the student.

8. Save.

9. In the Applicant Budget tab of RBAPBUD, verify that the student’s Aid Period is correct. Update as needed.

10. Run the Period Budget grouping process from ROAIMMP. Verify budget components and amounts populated successfully for each payment period.
11. Lock the budget group for each period in the student’s Aid Period. Save.

12. Run Needs Analysis from ROAIMMP. If it completes successfully, you should see an estimated/unofficial EFC is RNARSxx. Note this figure.
   a. Note that even if you see a “Pell EFC” amount, the student is not eligible for federal aid.
   b. Note: If EFC is prorated or there is chance that proration may be required in the future, note prorated EFC values on RNIMSxx.


14. Given the packaging schematics for the student’s EFC as well as need, determine how much, if any, xCCGIU fund to award. In RPAAWRD, manually award xCCGIU fund.

**Disbursement and Managing Funds:**

The disbursement and management of xCCGIU funds will be no different than for other forms of aid. Extra care should be taken not to exceed the total allocation of institutional funding for a given aid year, as that will be split between the fund for students who may be Title IV-eligible and complete a FAFSA,
and who complete an AACTUS due to undocumented immigration status. Refer to the Aid Disbursement in Banner and Funds Management in Banner procedures for details.

Should FAAs have any questions or concerns please contact the Banner Financial Aid Team:

- Phone: 860-723-0802
- Email SYS-BannerFinAidHelp@commnet.edu.