

# Procedures for the Validation of High School Completion Providers

## Financial Aid Eligibility

According to the 2014-2015 Federal Student Aid Handbook, a student must be qualified to study at the post-secondary level to receive Federal Student Aid (SFA) funds. A student qualifies if he/she:

- Has a high school diploma. (This can be from a foreign school if it is equivalent to a U.S. high school diploma);
- Has the recognized equivalent of a high school diploma, such as a general educational development or GED certificate;
- Has completed secondary school education in a homeschool.
  - # when they receive instruction “under the direction of a parent or parents or one standing in parental authority in or through the child’s home,” with a “curriculum” that is taught in a “bona fide” manner, which means in “good faith, not a sham or ” {Texas Educ. Agency v. Leeper, 893 S.W.2d 432 (Tex. 1994)}.
- Has met the requirements under the Ability-to-Benefit (ATB) criteria:
  - # Did not earn a high school diploma or GED but was enrolled in an eligible educational program of study before July 1, 2012 under either the Ability-to-Benefit test or credit hour standards, as discussed in Volume 1, Chapter 1 of the 2011–12 FSA.
  - # Does not have a certificate of graduation from a school providing secondary education, or the recognized equivalent of such certificate, but meets the requirements set forth by the House Amendment to the Senate 309 Dec. 9, 2014.

Furthermore, high school completion must be validated if:

- An institution has reason to believe that a high school diploma is not valid or was not obtained from an entity that provides secondary school education {34 C.F.R 668.16 (p)}.
- An institution has reason to believe the high school diploma is dubious — e.g., the college knows the student bought the diploma or transcript and was required to perform little or no work (2014-2015 Federal Student Aid Handbook).
- A student is flagged for Verification Tracking Group V4 or V5 by the Department of Education as a result of issues found pertaining to identity and/or high school completion status (2014–2015 Application and Verification Guide)
  - # Custom Verification Group. Tracking flag V4. Students must verify high school completion status and identity/statement of educational purpose.
  - # Aggregate Verification Group. Tracking flag V5. Students must verify high school completion status and identity/statement of educational purpose in addition to the items in the Standard Verification.

# High School Validation Committee

## Purpose

The purpose of the committee is to review high school completion providers to determine whether or not the provider is valid for the purpose of financial aid eligibility.

## Responsibilities

- Develop guidelines and criteria to review providers.
- Review providers and determine validity.
- Review process annually.
- Attend meetings.

## Committee Members

- Associate Vice President for Student Affairs
- Associate Vice President for Instruction
- Registrar
- Director of Financial Aid
- Assistant Director of Financial Aid

## Procedure

### Cause for Review of High School Completion Providers

For the purpose of determining financial aid eligibility a high school completion provider will be reviewed for validity as a result of one of the following:

- A student self-identifies as a high school graduate on the LEE COLLEGE admissions application, selects one of the following means by which the credential was obtained, and types the name of the provider rather than select from the list of approved providers for the purpose of financial aid. The typed entry will be captured in a report that will be reviewed regularly by the Director of Admissions/Registrar in an effort to identify providers that may require evaluation by the committee:
  - # Public/Private school outside the state of Texas — name of school typed in field by student (as opposed to selecting institution from drop down menu).
  - # Public/Private school outside of the country — name of school typed in field by student (as opposed to selecting institution from drop down menu).
  - # Other — name of school typed in field by student (as opposed to selecting institution from drop-down menu).
- A student indicates on the LEE COLLEGE application that he/she is not a high school graduate and later provides documentation from a high school completion provider that is not on LEE COLLEGE's list of approved providers for financial aid eligibility.
- A student who "self-certified" on the FAFSA that he/she has a high school diploma by means of a diploma, GED, or Home Schooled is compared against the LEE

COLLEGE admissions record and flagged for conflicting information under any of the following conditions:

- # Student selects an invalid provider from the drop-down list on the LEE COLLEGE admissions application.
- # Student selects “other” on the LEE COLLEGE admissions application.
- # Student provides documentation from a high school completion provider that is not on LEE COLLEGE's list of approved providers for financial aid eligibility.
- A student is flagged for Verification Tracking Group V4 or V5 by the Department of Education as a result of issues found pertaining to identity and/or high school completion status and provides documentation from a high school completion provider that is not on LEE COLLEGE’s list of approved providers for financial aid eligibility.
- A student responds “other” on the FAFSA when asked if he/she possesses a high school diploma or equivalent and provides documentation from a high school completion provider that is not on LEE COLLEGE’s list of approved providers for financial aid eligibility.
- LEE COLLEGE staff has reason to believe that a high school diploma is not valid or was not obtained from an entity that provides secondary school education.
- LEE COLLEGE staff has reason to believe the high school diploma is dubious — e.g., the college knows the student bought the diploma or transcript and was required to perform little or no work.
- LEE COLLEGE staff have become aware of a school or educational provider with a judgment or adverse judicial finding based on fraudulent or insufficient accreditation.
- External entities inquire about the acceptance of credentials from a provider by LEE COLLEGE for admission or financial aid purposes.

## **Guidelines/Criteria for Review of High School Completion Providers**

High School Completion Providers who are not already on the LEE COLLEGE approved provider list for the purpose of financial aid eligibility may be reviewed by the High School Validation Committee for validity utilizing the following guidelines/criteria:

1. Determine if any court judgments, administrative orders, or complaints have been filed against the provider by a state/federal government agency or consumer protection agency.
  - a. All schools and educational providers with any judgment or adverse judicial finding based on fraudulent or insufficient accreditation shall be placed on LEE COLLEGE’s ineligibility list for financial aid, and entering and current students identified with such high school completion providers shall be ineligible for future disbursements of financial aid effective immediately, unless qualified under other eligibility criteria. All schools and educational providers with any judgment or adverse judicial finding based on fraudulent or insufficient accreditation as confirmed by LEE COLLEGE legal counsel does not require committee review and will be acted upon as an invalid institution by the Director of Admissions/Registrar.
2. Determine valid accreditation or Home School with Parental Direction.
  - a. Providers found to be accredited by an appropriate agency as confirmed by the Director of Admissions/Registrar do not require committee review and will be acted upon as a valid.

- b. If the Director of Admissions/Registrar is unable to confirm the validity of the accreditation, the committee will review.
3. Determine valid home school as previously.
4. Review website.

## **Action Taken Upon Determination of Validity**

If a provider is deemed valid for the purpose of financial aid eligibility, the provider will be added to the approved provider list and added to the drop-down box of high school completion providers on the LEE COLLEGE admissions application.

If a provider is deemed invalid for the purpose of financial aid eligibility, the provider will be added to the invalid provider list and added to the drop-down box of high school completion providers on the LEE COLLEGE admissions application.

## **Student Notification**

If a student is found to have identified an invalid provider as the high school completion provider, the student will receive an automated email and checklist item in the student management system informing them that although they have been admitted, the high school completion provider is invalid for financial aid purposes. If seeking financial aid, the student will be provided with information about other available options (i.e., GED, ATB).

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