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# ILLINOIS RESIDENCY AND VERIFICATION REQUIREMENTS FREQUENTLY ASKED QUESTIONS

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SEPTEMBER 2023  
ILLINOIS STUDENT ASSISTANCE COMMISSION (ISAC)

**Illinois Residency and Verification  
for ISAC Programs  
Frequently Asked Questions (FAQs)**

**Q. Do all ISAC programs have an Illinois residency requirement?**

A. The following ISAC programs have an Illinois residency requirement:

- Monetary Award Program (MAP)
- Illinois Veteran Grant (special residency conditions apply) (IVG)
- Minority Teachers of Illinois Scholarship (MTI)
- Golden Apple Scholars of Illinois Program (GA)
- Special Education Teacher Tuition Waiver (SETTW)
- Nursing Education Scholarship (NES)
- Grant Program for Exonerates
- Higher Education License Plate Program
- Community Behavioral Health Care Professional Loan Repayment Program (CB)
- Illinois Teachers Loan Repayment Program
- Nurse Educators Loan Repayment Program
- School and Municipal Social Work Shortage Loan Repayment Program
- Veterans Home Nurse Loan Repayment Program

These ISAC programs **do not** have Illinois residency requirements; **however, there are other Illinois-related eligibility criteria that must be met:**

- Illinois National Guard Grant – the student must be active in the Illinois National Guard and attending an Illinois public institution
- Grant Programs for Dependents of Police, Fire and Correctional Officers - the officer must have been a resident at the time of death or disability and the student must be attending an Illinois institution that participates in the program
- Displaced Energy Worker Dependent Transition Scholarship - the award is limited to the cost of in-district and in-state tuition and fees
- Post-Master of Social Work School Social Work Professional Educator License Scholarship Program (SWSP) – the qualified applicant must hold a valid Illinois clinical social work license or social work license
- Early Childhood Access Consortium for Equity (ECACE) Scholarship – the applicant must be a member of the incumbent workforce, and provide documentation confirming their current membership in the Illinois Gateways to Opportunity<sup>®</sup> Registry
- John R Justice Student Loan Repayment Program – the applicant must be a licensed attorney in good standing with the Illinois Bar and employed as a public defender or prosecutor

**Q. Are colleges responsible for verifying Illinois residency only for those applicants who are selected for federal verification?**

- A. It is the college's responsibility to ensure that all recipients of ISAC programs meet all of the eligibility requirements associated with the program(s) that the student is receiving, including Illinois residency for those ISAC programs that require it. The financial aid office must have policies and procedures in place to help identify which students can be awarded based on application data of which may have conflicting information that needs to be resolved by collecting additional information. See the administrative rules reference regarding residency from ISAC General Provisions - here is the link for 2023-24: <https://www.isac.org/e-library/documents/administrative-rules/2023-24-isac-rules/2700-General-Provisions.pdf>.

**Q. Must colleges verify Illinois residency for all Monetary Award Program (MAP) recipients?**

- A. As stated above, policies and procedures need to be in place to ensure that all students who are receiving an ISAC gift assistance program are meeting the eligibility requirements specific to that program. One of the eligibility criteria for MAP recipients is that the student is an Illinois resident, so it is the financial aid office's responsibility to ensure that students receiving a MAP grant are meeting the residency requirements. Checking an applicant's self-reported data on the Free Application for Federal Student Aid (FAFSA®) may be enough to confirm residency; however, there must also be a process in place to identify those students where additional confirmation may be necessary. At the point when the request for MAP payment is submitted for a particular student, the institution is certifying that the student meets all eligibility criteria for the program, including residency.

**Q. What are some examples of situations in which the financial aid office does not need to collect additional documentation to verify Illinois residency?**

- A. The following are examples of when additional documentation would not need to be collected from the student applicant or parent(s) to verify residency:
- A dependent student and the student's parent(s) provide an Illinois address on the FAFSA and there is no conflicting information to suggest that Illinois is not their true, fixed, and permanent home.
  - An independent student provides a date of residency on the FAFSA which indicates that they have been a resident of Illinois for more than 12 months prior to the start of the academic year for which the award would be received, and there is no conflicting information to suggest that Illinois is not his/her true, fixed, and permanent home.
  - The student was enrolled at an ISAC-approved Illinois high school for the preceding consecutive 12 months prior to the start of the academic year for which assistance is requested.
  - The student was enrolled in an ISAC-approved MAP institution for the preceding consecutive 12-months prior to the start of the academic year for which assistance is requested.

- The student received payment of a MAP award during the previous academic year.

Keep in mind, that in all cases and regardless of the examples noted above, if the financial aid office is aware of or has any conflicting information which suggests that a student applicant and/or a dependent student's parent(s) may not be meeting ISAC residency requirements, the financial aid office would need to request additional documentation to confirm residency status.

**Q. What are some examples of conflicting information?**

- A. In short, any information or documentation that appears to question the validity of a student's claim of Illinois residency can be considered conflicting information.

Some examples of information that should be investigated include:

- information or documentation in the college's records that shows the student or the student's parent with an address or residency in a state other than Illinois.
- an incoming freshman student indicates on the FAFSA that s/he graduated from a high school in a state other than Illinois, but the parents indicate on the FAFSA that they have been residents of Illinois for more than five years.

**Q. Does use of the term "verify" mean that documentation must be collected from every MAP recipient to verify residency?**

- A. ISAC recognizes that from a college's perspective, the term "verify" implies that colleges will need to collect documentation and/or ask students to sign statements confirming the validity of their information. However, just as the federal verification process has measures in place to simplify the verification process in certain situations, the same applies to ISAC verification rules.

While it is the college's responsibility to partner with ISAC to ensure that all MAP recipients meet the residency requirement, it does not mean that documentation must be collected from every MAP recipient. Information that is provided on the FAFSA and in ISAC's GAP Access portal can be relied on to confirm residency for many MAP recipients, and ISAC's **administrative rules** specify conditions when it may not be necessary to collect additional documentation to verify residency.

**Q. If a student self-reports Illinois residency (for more than one year for independent students) on their FAFSA and the Institutional Student Information Record (ISIR) and GAP Access reflects this, is it necessary to collect any additional documentation from the student?**

- A. For a dependent student, if the parents have indicated on the FAFSA their state of residence is Illinois, no additional documentation is needed. For an independent student, the self-reported data on the FAFSA can be relied on if the answers to the length of residency

questions indicate that s/he has been a resident of Illinois for more than 12-months prior to the start of the academic year and there is no known conflicting information.

**Q. What data elements on the ISIR can be used to check residency and/or determine if additional documentation is needed?**

A. In addition to the address and state residency information that is provided on the FAFSA, information about the student’s high school data may be helpful in determining if additional documentation is needed.

**Q. What data fields in GAP Access can be used to check Illinois residency for MAP recipients?**

A. The data elements that appear in GAP Access that can be used to confirm self-reported Illinois residency data are:

- Dependent student’s address
- Student’s State/Residence Date field
- Parent’s State/Residence Date field

School Certification Data		
<b>Citizenship Fields</b>	<b>Selective Service Fields</b>	<b>Verification Fields</b>
Citizenship Status 1	Are you Male or Female F	Selected for Verification N
Alien Registration #	Selective Service to Register	
DHS Match Flag	Selective Service Match Flag	
Secondary DHS Match Flag	Selective Service Reg Flag	
SSA Citizenship Flag A		
<b>Residence Fields</b>	<b>NSLDS Default Fields</b>	
Student's State Residence Date IL -	NSLDS Match Flag 1	
Parent's State Residence Date IL -	NSLDS DB Results Flag 3	
<b>Address</b>	Date of Birth	
1234 Street Name	Appl Receipt Date 10/01/2019	
City, IL Zip Code	CPS Processing Date 10/02/2019	
	Last Update 10/02/2019	

Additional data elements that appear in GAP Access that can assist in confirming Illinois residency are:

- Application Disqualify Codes
- Paid Previous (Displays which term in the prior academic year the student was paid)

Details	
Depend Code D	Update Type U
Academic Level 4-Senior	As Of Date
Living Allowance \$4,875	Disqualify
EFC Change Flag	MAP Suspend
Primary EFC \$8,780	ISAC Default N
Adjusted EFC \$18,482	MAP Paid Credit Hours 000
Estimated Pell \$0	<b>Paid Previous 3</b>
Adjusted Pell \$0	Continuing Y
Student Contribution \$1,800	ING Certified
Student Change Flag	

Code	Definition of Disqualify Code
1	Dependent student, parents <b>NOT</b> Illinois Residents
2	Independent Student <b>NOT</b> and Illinois resident
4	Invalid (or blank) class level, such as graduate student
6	Loan default is overridden; payment is allowed
7	MAP Paid Credit Hours exceed 135
8	Student is in default on a Stafford Loan
9	Other ISAC disqualify
Blank	Not Disqualified

Code	Definition of Paid Previously Code
0	Student was not paid in the previous year
1	Student was paid the 1 <sup>st</sup> Semester of the previous year
2	Student was paid the 2 <sup>nd</sup> Semester of the previous year
3	Student was paid the 1 <sup>st</sup> Quarter of the previous year
4	Student was paid the 2 <sup>nd</sup> Quarter of the previous year
5	Student was paid the 3 <sup>rd</sup> Quarter of the previous year

**Q. Does a dependent student need to show proof that the parent lived in Illinois before the first FAFSA filing date, or simply that the parent is currently an Illinois resident?**

- A. If a dependent student's parent indicates on the FAFSA that s/he is a resident of Illinois, the student would not need to provide any additional documentation to prove the date residency was established. There are no rules regarding when a parent must establish residency in Illinois, nor is there a length of time period requirement for which they must have resided in Illinois. If however, the financial aid office has reason to believe that conflicting or inaccurate information has been provided, additional documentation should be collected.

To be considered a resident of Illinois, the parent must physically reside within the State of Illinois and Illinois must be his or her true, fixed, and permanent home.

If a dependent student and/or his/her parent move to Illinois after the FAFSA has been completed, the applicant may correct the FAFSA to provide a new address and update the state of residence information.

**Q. If a dependent student's parents are divorced and the parent who is required to provide their information on the FAFSA resides out of state and the other parent lives in Illinois, is the student eligible to receive MAP?**

- A. No. The parent who is required to complete the FAFSA must be an Illinois resident to ensure the dependent student meets the residency requirements for MAP.

**Q. If a dependent student's parent is in the Armed Forces and not currently residing in Illinois, and the student wants to enroll in an Illinois institution, does s/he meet Illinois residency requirements?**

- A. U.S. Armed Forces members and foreign missionaries qualify as Illinois residents if they:
- physically resided in Illinois immediately prior to entering the U.S. Armed Forces (missionaries must reside in Illinois for six continuous months prior to entering missionary service);
  - return or plan to return to Illinois within six months of the conclusion of service; and
  - can demonstrate that their domicile was Illinois throughout such service.

A foreign missionary is an individual who is assigned duty outside the United States by an organization that engages in educational, philanthropic, humanitarian, or altruistic works. The missionary organization must have been engaged in placing foreign missionaries for at least five years and must be exempt from the payment of federal taxes. Some examples of such organizations include the Peace Corps and the Evangelical Alliance Mission.

Applicants who are dependents of U.S. Armed Forces members or foreign missionaries will be considered an Illinois resident if their parent(s) meets the Illinois residency requirements listed above.

Applicants who are the spouses of U.S. Armed Forces members or foreign missionaries must demonstrate that their absence from Illinois was the result of residing with a spouse during the period of service outside the state and must also demonstrate that their domicile continues to be Illinois.

**Q. If a student changed dependency status to become an independent student, but also received a payment of MAP the previous academic year, would Illinois residency need to be verified?**

A. An independent student must have resided in Illinois for 12 continuous months prior to the start of the award year and Illinois must be his/her true, fixed, and permanent home. If the student does not meet this requirement, even if s/he received MAP in the previous year, the student would not be eligible for MAP as an independent student.

**Q. If a school makes a dependency override to declare a student as homeless, therefore making them be an independent student, do you still need proof of 12 continuous months of Illinois Residency?**

A. Yes, a school must be conscious of the ISAC Illinois Residency rules for an independent student when making a dependency override to ensure that the student is still eligible for a MAP award.

Definition of an independent student: An independent student must have resided in Illinois for 12 continuous months prior to the start of the award year and Illinois must be his/her true, fixed, and permanent home. If the student does not meet this requirement, even if s/he received MAP in the previous year, the student would not be eligible for MAP as an independent student.

**Q. If an independent student indicates a state other than Illinois on the FAFSA, but makes a correction to provide an Illinois address, what are the college's responsibilities regarding verification of residency?**

A. In this case, it will be the school's responsibility to ensure that the student meets the 12-month residency requirements for independent students. Also, in this scenario the financial aid office would be aware of conflicting information regardless of how the length of residency questions were answered in the second/subsequent transaction because the student's initial FAFSA had listed a state other than Illinois.



**Q. If a student is awarded MAP in May, but moves out of state in August before the fall term begins, is the student still eligible to receive the MAP award?**

- A. Yes. Applicants who cease to be Illinois residents after MAP award notification may complete the academic year with the awarded grant.

For example, if a dependent student's parents move out of state after completing the FAFSA in February and after receiving notification of MAP eligibility in May, the student remains eligible for MAP for the full award year that begins in August, assuming the student continues to meet all other eligibility requirements.

**Q. What is considered “adequate” checks and balances, in regard to a college’s system of internal controls to ensure that verification of Illinois residency is completed and documented prior to awarding and certifying eligibility for a MAP award?**

- A. During an ISAC program review, ISAC’s review team will be looking to ensure that a process is in place to determine which students meet the basic requirements to be considered an Illinois resident based on self-reported data on the FAFSA, and a way to identify those students who may require additional documentation.

A best practice would include written policies and procedures regarding the Illinois residency verification process, as well as a checklist for determining when additional documentation would be required.

**Q. What can be done if the financial aid office is not able to confirm Illinois residency, but the student is insistent that s/he is an Illinois resident?**

- A. Regardless of the student’s claim, if residency cannot be determined, the student or the institution may verify residency through ISAC’s appeal process.

**Q. What does “12 continuous full months” mean (for independent students)—that is, how are schools to document this?**

- A. For an independent student to be considered a resident of Illinois s/he must have physically resided in Illinois (at the time of application) and has resided for 12 continuous full months immediately **prior to the start of the academic year** for which assistance is requested and Illinois must be his/her true, fixed, and permanent home.

Example: An independent student attending an institution with an academic year starting on August 23, 2023, must have resided in Illinois from August 23, 2022, through August 22, 2023. If the school is requiring the student to provide documentation to confirm residency during the relevant timeframe, the school can rely on suggested types of documentation listed in ISAC’s General Provisions such as, a driver’s license, utility bills, rental documents, etc., if the dates on the documents indicate the applicant has

resided in Illinois for the relevant 12 continuous full months. Schools may also choose to request/accept additional types of documentation. It is not necessary for schools to collect documentation for each of the 12-months unless the schools are aware of conflicting information and/or is questioning that the 12-month residency was continuous.

**Q. ISAC rules state that verification is not required for students who were enrolled in a MAP institution or approved Illinois high school for the preceding 12-months prior to the start of the academic year; however, students are often not in school during the summer months so does that time count toward meeting the preceding 12-month requirement?**

A. Yes, the summer months (e.g., June-August) would be counted in the 12-month timeframe if the applicant was enrolled in an ISAC-approved MAP institution or Illinois high school for the full academic year in the preceding 12-months prior to the start of the academic year and there is no conflicting information to suggest that Illinois is not his/her true, fixed, and permanent home.

**Q. Can a student use an expired government issued photo ID to prove identity and to prove Illinois residency?**

A. To prove identity the student must appear in person at the school and present a valid unexpired government-issued photo ID such as a passport or a driver's license or other state-issued ID. The ID needs to be unexpired at the time it is checked. For proving identity, it does not matter if the ID is due to expire during the award year. For proving Illinois residency, the student must present a valid unexpired government-issued photo ID. In response to challenges resulting from the COVID-19 pandemic, the U.S. Department of Education (ED) and ISAC have provided guidance allowing temporary exceptions to this requirement.

**Q. Can a Temporary Visitor's Driver's License (TVDL) be considered acceptable documentation to confirm residency for ISAC programs?**

A. Since it states on the TVDL that it is not valid for identification, the TVDL is not considered acceptable documentation to confirm Illinois residency for ISAC programs. However, just because a parent has a TVDL does not mean that they do not meet the residency requirements for an ISAC Program. To obtain a TVDL, a person had to have resided in Illinois for 12-months prior to it being issued, so the student or parent could provide the same documentation they used to obtain a TVDL. See the Illinois Secretary of State's website for more information about the TVDL:  
[www.cyberdriveillinois.com/departments/drivers/TVDL/tvdl.html](http://www.cyberdriveillinois.com/departments/drivers/TVDL/tvdl.html).

**Q. Is a Temporary Driver's License (TDL) valid for confirming IL residency?**

- A. Yes. A temporary driver's license is now issued in Illinois before they mail/provide the permanent card to the individual, so it would be acceptable if the school is comfortable with the condition of the document. Or the school could require the student to bring in the actual license once they've received it. It is ISAC's understanding that the permanent card is received in fairly timely manner

**Q. What is the responsibility of ISAC during the eligibility process through GAP? (i.e., for MAP, if an independent student has a FAFSA that says IL, but lists a date of residence that is within 12-months) Is ISAC determining they are ineligible or is that up to the school to validate and determine?**

- A. ISAC will load a **dependent's** student record (ISIR) into the ISAC database from CPS (Central Processing System) when the student's state of residence is Illinois, or is left blank, or is a state other than Illinois, but the state of legal residence for the parent(s) is Illinois and a MAP approved school is listed as one of the college choices. ISAC does not use answers to questions about the date a student or parent became a legal resident to determine Illinois Residency when loading the ISIR from CPS. If an **independent** student indicates a state other than Illinois, ISAC will not receive the student's information from CPS. Please reference Critical Data Items for 2023-24 Eligibility: <https://www.isac.org/isac-gift-assistance-programs/map/applying-for-map/2023-24-critical-data.html>.

For your question regarding an independent student, the school will need to verify that the student has been an Illinois resident for 12-consecutive months. A school could use the information on the FAFSA if it indicates residency of 12-months or more, as long as there is no other conflicting information: <https://www.isac.org/isac-gift-assistance-programs/map/map-eligibility-requirements/illinois-residency-requirements.html>.

**Q. What is the school's responsibility on determining residence?**

- A. Schools are expected to verify residency for recipients of any ISAC gift assistance programs for which Illinois residency is a requirement.
- This applies to all students regardless of how they applied, either FAFSA or the Alternative Application.
  - When a school certifies a payment request, it is certifying that the student is an enrolled, eligible Illinois student meeting satisfactory academic progress.

Acceptable Documentation is listed in our General Provisions Section 2700.50 and our website at following links: <https://www.isac.org/e-library/documents/administrative-rules/2023-24-isac-rules/2700-General-Provisions.pdf>.

- Q. I have an independent student that has indicated that her legal residency is in Illinois on the FAFSA, but she is currently living in Missouri. Her mailing address here at the college is the Missouri residence and her mailing address on the FAFSA is the Missouri address as well. She can provide me with an Illinois license, but I think that is due to not updating it**

yet. We have told her that since mailing address is in Missouri and that is where she is currently living that she doesn't qualify for MAP. Do you agree with this decision, or should we award her MAP due to having a valid Illinois driver's license?

- A. ISAC would agree that if the mailing address that she's reported to two federal agencies is Missouri, then it doesn't sound like Illinois is her "true, fixed, and permanent home" (per ISAC rule definitions).

For some, having an IL driver's license could be considered sufficient documentation to confirm residency for MAP, but in this case, because there is conflicting information and because a driver's license doesn't prove someone is currently residing in Illinois, I think you'd want to ask for other types of documentation to confirm that she is/was living in Illinois before awarding her MAP. Maybe utility bills or something else along those lines which can prove that she was residing in Illinois for the 12-month requirement for an independent student and that Illinois is her fixed and regular home. If the driver's license is all she's willing or able to provide and you don't feel that is enough to resolve the conflicting information, then you don't have to award her MAP.

**Q. Are schools required to verify Illinois Residency for all MAP, ING, IVG, etc. applicants?**

- A. Schools are expected to verify Illinois residency for all ISAC programs that require it. In general, you may not necessarily have to collect documentation from all students, but you do need to have procedures in place to identify those students for whom you may or do need to collect additional documents to confirm residency, and in many cases you can rely on data provided on the FAFSA or Alternative Application (that may appear in GAP Access), as long as you are not aware of any conflicting data for the student. Here's the administrative rules reference regarding residency from ISAC [General Provisions](#):

**Section 2700.50 Determining Applicant Eligibility**

- a) The evaluation of applicant eligibility is the responsibility of both ISAC and the institution.
- c) Institutions shall determine (in accordance with ISAC's rules or federal regulations) whether an applicant is eligible for ISAC gift assistance based upon enrollment in a particular academic program and the eligibility criteria of the ISAC gift assistance being sought.
- d) Specific eligibility criteria for each ISAC gift assistance program can be found in its respective Section of this Part.
- e) The institution is required to verify the residency of all applicants to ISAC gift assistance programs for which Illinois residency is a requirement.

- 1) An institution is not required to verify residency if:

- A) The applicant received payment of a MAP award during the previous academic year; or
- B) The applicant was enrolled in an ISAC-approved MAP institution or an ISAC-approved Illinois high school (see Section 2700.30) for the preceding consecutive 12-months prior to the start of the academic year for which assistance is requested.

2) Notwithstanding the exceptions named in subsection (e)(1), the institution shall verify residency:

- A) When an applicant has changed dependency status during the academic year to become an independent student; or
- B) If the institution has any information that indicates the applicant may not be a resident of Illinois.

3) Data from one or more of the documents listed in this subsection (e)(3) may provide proof that an applicant (or parent) is an Illinois resident, as defined in Section 2700.20. The institution may choose to request documents that are in addition to, or instead of, those listed. For an independent student applicant, the dates recorded on the documents must indicate the applicant has resided in Illinois for the relevant 12-continuous, full months.

- A) A valid State of Illinois tax return or federal tax transcript
- B) Illinois high school or college transcript
- C) Illinois driver's license
- D) Utility or rent bills in the applicant's (or parent's) name
- E) Illinois auto registration card 23 ILLINOIS ADMINISTRATIVE CODE CH. XIX, SEC.
- F) Residential lease in the applicant's (or parent's) name
- G) Wage and tax statements (IRS Form W-2)
- H) Statement of benefits history from the Illinois Department of Healthcare and Family Services
- I) State of Illinois identification card issued by the Secretary of State
- J) Statement of benefits from the Illinois Department of Employment Security
- K) Statement of benefits from the Social Security Administration
- L) Illinois voter's registration card
- M) Property tax bill
- N) IRS Form 1099-Miscellaneous Income Statements

4) If an applicant is a resident of Illinois, but the institution cannot document this fact, the applicant or the institution may verify residency through ISAC's appeal process. (See Section 2700.70)

f) For all other eligibility criteria, if the institution has any information that indicates that the applicant does not meet the eligibility requirements of ISAC-administered programs or if an applicant is selected for verification in conjunction with federal student assistance, that applicant shall be verified for ISAC-administered programs. A selected applicant must be verified for ISAC programs even if the applicant is ineligible for federal student assistance.

Sometimes there's confusion over letter f) above ... so keep in mind that it is saying that if someone is selected for federal verification, you must then also verify other data elements beyond just residency, such as the data used to determine the EFC and other items that are required according to federal guidance regarding student eligibility. It does not mean that you only have to verify residency for those selected for federal verification.

Other resource links:

- MAP webpage re: Illinois residency requirements -- <https://www.isac.org/isac-gift-assistance-programs/map/map-eligibility-requirements/illinois-residency-requirements.html>
- MAP webpage re: verification -- <https://www.isac.org/isac-gift-assistance-programs/map/map-eligibility-requirements/verification-for-map.html>
- Illinois residency FAQ -- <https://www.isac.org/isac-gift-assistance-programs/map/media/FAQ-ISAC-Verif-Rules.pdf> (the attached document from this link is currently in the process of being updating, but it still gives some good guidance on when you do or do not need to collect additional documentation to confirm residency).

#### Q. Could you give me specifics on Illinois Residency Verification for Illinois Veteran Grant (IVG)?

A. With IVG, there are requirements related to Illinois residency that must be met to establish eligibility for the program, and there is also a requirement that the student must reside in Illinois when using benefits.

#### From **IVG Rules, Section 2733.20 Applicant Eligibility**

a) **A qualified applicant** shall be any member of the Armed Forces of the United States, a reserve component of the Armed Forces, or the Illinois National Guard who has served at least one year of federal active-duty service and whose service has been characterized as honorable, provided the applicant:

1) was a:

- A) resident of Illinois at the time of entering federal active-duty service or within 6 months prior to entering the service; or
- B) student at an Illinois public university or community college at the time of entering federal active-duty service; and

2) established or plans to establish Illinois residency within 6 months after leaving federal active-duty service, or if married to a person in continued military service:

- A) applied for this grant within 6 months after and including the date that the spouse was stationed within Illinois; or
- B) established Illinois residency within 6 months after and including the date that the spouse was separated (if the spouse was stationed outside Illinois).

b) **To use benefits**, a qualified applicant meeting the requirements of subsection (a) must reside in Illinois while enrolled unless federal active duty is being served during the time of enrollment or the qualified applicant is residing with a spouse in continued military service who is currently stationed outside of Illinois.

c) An applicant who does not meet the residency requirements in subsection (a) may be a qualified applicant if the applicant:

- 1) resides in Illinois at the time of application and while enrolled; and

2) has been a resident of Illinois for at least 15 consecutive years at some point since leaving federal active duty.

To some degree it's situational on whether or not you would need or want to collect additional documentation to confirm residency.

For example, if ISAC approves eligibility today, and the student is enrolled for the fall term and nothing has changed and you have no conflicting information, you wouldn't necessarily need to collect additional documentation. ISAC confirms residency based on the documentation received to establish residency.

But, as you know, many IVG students may be determined eligible by ISAC, but then don't use their benefits right away, and since they don't have to re-apply each year, ISAC is only checking residency when the student applies and is initially establishing eligibility. So, if you have a student who applied in 2020 and ISAC determined the student to be eligible at that time, the student retains their eligibility, even if they were to move out of state, but to use benefits, they must reside in Illinois while enrolled.

So, you could have a policy to not collect documentation from students who were determined eligible by ISAC in the current term/academic year as long as nothing changed with the student's state of residence information that the school has on file for the student, but then have a process to confirm that the student resides in Illinois for any future terms/years, which may or may not involve collecting additional documentation.

Many schools require student veterans to provide information each term on what veteran benefits they want to use, which is a good best practice and in doing so, it would also be good practice to have the student confirm that he/she is residing in Illinois as part of that process and sign a certification statement, which could be sufficient. You may then only need to collect additional documentation to confirm residency when the information the student provides conflicts with other information the school may have on file for the student (student billing address, etc.) or if you have some other reason to believe the student no longer resides in Illinois.

There may also be situations when a student may appeal if there is a unique or special reason why they have had to leave the state (illness, to obtain health care, etc.), but you would want to be sure to document that similar to a PJ and/or submit the appeal request to ISAC.

4) If an applicant is a resident of Illinois, but the institution cannot document this fact, the applicant or the institution may verify residency through ISAC's appeal process. (See Section 2700.70)

**Q. With verification implemented again for the 23/24 year, are we required to get Illinois residency verification for students who qualify for MAP based on the alternative application?**

- A. While ISAC was consistent with ED in not expecting schools to complete verification of the EFC or certain FAFSA data elements for MAP during the national emergency, the requirement to verify Illinois residency for MAP was always in place and there were no exceptions to that, regardless of how the student applied – either via the FAFSA or the Alternative Application.

In order to apply for MAP using the Alt App, the student must meet the RISE Act criteria, which includes being a resident of IL ... and, although we do not select students who have completed the Alt App for verification, students are still expected to meet all MAP eligibility criteria, which includes Illinois residency. You may not need to collect additional documentation to confirm residency and could possibly rely on address info provided on the Alt App as long as you aren't aware of any conflicting data for the student, but the school is still expected to ensure that all students receiving MAP are Illinois residents. Here are some resource links:

- e-Message re: 2022-23 verification -- <https://www.isac.org/e-library/partner-e-messages-and-newsletters/faa-e-messages/eLibrary-faa-2022-0714.html>
- MAP webpage re: Illinois residency requirements -- <https://www.isac.org/isac-gift-assistance-programs/map/map-eligibility-requirements/illinois-residency-requirements.html>
- MAP webpage re: verification -- <https://www.isac.org/isac-gift-assistance-programs/map/map-eligibility-requirements/verification-for-map.html>
- Illinois residency FAQ -- <https://www.isac.org/isac-gift-assistance-programs/map/media/FAQ-ISAC-Verif-Rules.pdf>

#### **Q. National Guard grant does not seem to state that the school needs to determine ongoing residency.**

- A. Illinois National Guard members do not have to be Illinois residents, but they are verified by the Illinois Dept of Military Affairs to determine eligibility every year once the student applies for ING.
- Section 2730.20 Applicant Eligibility:
    - Students must file an application annually indicating the institution to be attended. No payment will be authorized for any applicant until a current application is on file.
    - Qualified applicants will receive an eligibility letter from ISAC for each academic year following the filing of the application. Ineligible applicants will receive written notification from ISAC of their ineligibility to receive program benefits.
    - ISAC will verify application data in consultation with the Illinois Department of Military Affairs (DMAIL) when reviewing an application. Changes to a recipient's National Guard status must be reported to ISAC by DMAIL.
    - To receive an Illinois National Guard Grant, a qualified applicant must notify the institution of the qualified applicant's eligibility no later than the last scheduled day of classes for the term for which a grant is requested.