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TO: Financial Aid Directors
Texas Public and Private/Independent Institutions of Higher Education

FROM: DeChà Reid, Director, Financial Aid Services

DATE: August 22, 2017

RE: Guidance Regarding Comment Code 399 for State Aid Programs

On August 10, 2017, the U.S. Department of Education (ED) announced that they will be continuing to monitor possible conflicting information between 2016-17 and 2017-18 FAFSAs throughout the 2017-18 FAFSA processing cycle. To help ensure that Title IV aid is awarded based on accurate information, a 2017-18 ISIR with Comment Code 399 received by an institution **any time** during the 2017-2018 FAFSA processing cycle will require institutional review for possible resolution of conflicting information since the error could be related to information that was provided on the 2017-18 FAFSA. However, as noted in Dear Colleague Letter GEN-16-14, institutions are **not** required to submit corrections to a 2016-17 ISIR if the published September 9, 2017 deadline date for making such corrections has passed, and therefore no further action is required for the 2016-17 processing cycle.

For state aid programs, institutions should continue to resolve 2016-17 conflicting information related to comment code 399 until the September 9, 2017 deadline. No changes are required for state grant programs after September 9. If changes to a student's eligibility occur prior to the September 9 deadline, any ineligible funds should either be awarded to another eligible student as a late disbursement or returned to the Texas Higher Education Coordinating Board (THECB). All changes to student records caused by comment code 399 must be submitted by the institution to the THECB in a revised 2017 End-of-Year (EOY) report no later than **September 15, 2017**.

Keep in mind that standard reconciliation procedures for state financial aid programs that are not impacted by comment code 399 should continue to occur to ensure that program totals and student records are accurate for the FY 2017 Financial Aid Database report.

For questions, please contact Financial Aid Services at 1-844-792-2640 or [CONTACT US](#). (Select the "State and Federal Grants and Scholarships" option in the drop-down selection under **Contact Reason**).

cc: Ken Martin, Assistant Commissioner
Charles W. Puls, Ed.D., Deputy Assistant Commissioner