



National Association for College Admission Counseling

Guiding the way to higher education

Policy Brief: Verification of High School Completion

Effective July 1, 2011, all colleges and universities must:

“Develop and follow procedures to evaluate the validity of a student’s high school completion if the institution or the Secretary has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education” (Higher Education Act § 668.16(p)).

Background

To receive Title IV federal student aid, such as Pell Grants and Stafford Loans, students must have earned a high school diploma or its recognized equivalent, such as a general equivalency diploma (GED) or ability to benefit (ATB) test. In a 2009 Government Accountability Office (GAO) [report](#), investigators identified instances in which admission representatives at two publicly-traded for-profit schools helped students obtain fraudulent high school diplomas from diploma mills, defined by the GAO as “entities that provide invalid diplomas, usually for a fee and little academic work,” enabling the students to gain access to federal student aid. In its report, the GAO notes:

“[The Department of] Education’s monitoring of ATB tests and high school diploma requirements is critical to protecting students and guarding against potential fraud and abuse of federal student aid funds. When students who do not have the skills needed to succeed in school are fraudulently given passing scores on the ATB test or directed to diploma mills for fake high school degrees, they are at greater risk of dropping out of school, incurring substantial debt, and defaulting on their federal loans. When this happens, students’ credit records are tarnished and their long-term financial well-being is jeopardized. In addition, taxpayers and the government, which guarantees the loans, bear the risks associated with federal loans when a student defaults.”

Federal Regulations

Based on the GAO’s recommendations, the U.S. Department of Education drafted a new rule defining a high school diploma. Under new Higher Education Act regulations (§ 668.16(p)), institutions are required to develop and follow procedures for evaluation of the validity of a student’s high school completion if the institution or the Department of Education has reason to believe that the high school diploma is not valid or was not obtained from an entity approved to provide secondary education. This regulation becomes effective July 1, 2011.

Compliance with this regulation involves collaboration between postsecondary institutions and the federal government:

- College and universities will develop procedures to follow in the case of a concerning credential.
- The U.S. Department of Education will maintain a list of public and private high schools and ask two questions on the Free Application for Federal Student Aid (FAFSA) relevant to high school completion.

This collaborative effort will facilitate the review of suspect high school credentials.

Important Note: The Department will not require institutions to submit documentation for validation of all students' high school completion. The vast majority of admission applicants will not require verification, as they come from high schools with which an institution is familiar or appear on the Department's list of public and private high schools. It is only when an institution encounters suspect credentials from a high school unfamiliar to the institution and/or the Department of Education selects a student's FAFSA for further review that a college or university must initiate and/or demonstrate its procedures for determining the validity of a student's high school completion. Institutions are afforded discretion for determining validity of high school completion based on their own established procedures.

Institutional Role in Completion Verification

While the Department does not specify which office, financial aid or admission, will need to handle diploma validity evaluation, it is likely that at most institutions these offices will work together to develop a procedure for evaluating high school completion.

Additionally, the Department does not provide a rubric for the development of procedures for evaluating the validity of high school completion. However, it does indicate that procedures could include obtaining various types of documentation, such as a copy of the student's diploma or transcript of courses completed. The Department also notes that procedures for determining the validity of foreign secondary credentials could inform procedures for domestic high school completion.

The Department will provide institutions with guidance on developing and implementing procedures for this regulation, as necessary, in Dear Colleague Letters, electronic announcements, and the Federal Student Aid Handbook. NACAC will monitor these communications and share them with members.

To help members prepare for compliance with this regulation, NACAC is gathering samples of policies already in place at member institutions. Policies indicating procedures for detecting and reporting fraudulent high school diplomas can be submitted as models for institutions building policies to the [NACAC Knowledge Center](#).

Sample Policy/Procedure

The following sample policy was drafted based on NACAC's regulatory interpretation and is not endorsed by the U.S. Department of Education:

The admission office will confirm all students' transcripts arrive from a high school with a CEEB code, as well as the high school seal and/or signature. If a transcript is from a high school that lacks a CEEB code or seal/signature, the admission office will investigate to confirm the school is recognized by the state department of education or home school association. The admission office may request a copy of the student's diploma at any point in the admission process to verification process. If a diploma is determined invalid, a GED may be required for admission consideration.

Federal Role in Completion Verification

To help institutions identify diplomas that are suspect, the Department will establish and maintain a list of public and private high schools, populated by surveys from the Department's National Center for Education Statistics. Also, the department added two questions to the 2011-12 FAFSA (print and online) to assist institutions in identifying suspect high school completion. The following

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questions will be asked of first-year students:

26. When you begin college in the 2011-2012 school year, what will be your high school completion status?

High school diploma. Answer question 27.	<input type="radio"/> 1	Homeschooled. Skip to question 28.	<input type="radio"/> 3
General Educational Development (GED) certificate. Skip to question 28.	<input type="radio"/> 2	None of the above. Skip to question 28.	<input type="radio"/> 4

In the online version, students will not be able to skip this question. Students who indicate they will have a high school diploma will be instructed to provide the name of the high school and the city and state where that school is located.

27. What is the name of the high school where you received or will receive your high school diploma?
Write in the high school name, and the city and state where the high school is located.

High School Name	<input type="text"/>	STATE <input type="text"/>
High School City	<input type="text"/>	

In the online version, students will not be able to skip this question and there will be a drop-down list of secondary schools maintained by the Department, as mentioned above. Students who cannot find their high school will be able to enter the information requested.

If replies to these questions do not correspond with the Department's list, the Department may select the student's FAFSA for further review by the institution to determine if the student has a valid high school diploma before the student can receive any Title IV federal student aid. In addition, if an institution has reason to suspect the validity of a high school diploma, regardless of FAFSA completion, the institution is responsible for determining validity.

See [NACAC's Final Regulations Fact Sheet](#) for additional regulatory information on college admission activities.