BET MIDRASH OHEL TORAH

CHECKING THE VALIDITY OF A HIGH SCHOOL DIPLOMA

Graduation from a high school program is a requirement for eligibility for federal Title IV financial aid.

High School diplomas are reviewed to ensure the information is complete and clearly documents high school graduation. Specific focus is placed on the name and address of the high school to ensure that the entity issuing the documentation is not a bogus institution or an entity that charges a fee for the issuance of the diploma while requiring the student to perform little or no work. Bet Midrash Ohel Torah's Registrar's Office maintains a list of high schools known to provide secondary education. This is a dynamic list that is updated regularly with information from resources including, but not limited, to national high school directories, trusted community sources and knowledgable admissions officers.

In the course of review of a high school diploma, the Registrar's office may identify questions on a document issued by a school known to provide secondary education. These may include minor issues such as typos or errors, discrepancies or aberrations not usually seen on diplomas from that high school. In such a case, Registrar staff will contact the high school to confirm that the diploma was indeed legitimately issued by the high school, and where necessary, have the high school resolve any errors. The student will then be considered cleared for Title IV eligibility in this aspect.

If the high school cannot confirm the legitimacy of the high school diploma in question, then the Registrar's office will inform the student that he cannot qualify for aid based on the document he submitted.

The following is the procedure if the institution has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary education.

1. The Registrar's office will contact the high school to obtain one of the following pieces of documentation from the high school:
    a. Transcripts;
    b. Written descriptions of course requirements; or
    c. Written and signed statements by principals or executive officers at the high school attesting to the rigor and quality of coursework at the high school; and

2. If the high school is regulated or overseen by a state agency, Tribal agency, or Bureau of Indian Education, staff will confirm with or receive documentation from

that agency that the high school is recognized or meets requirements established by that agency; *(in certain instances this does not apply, see below*)*

and

3. If the Secretary has published a list of high schools that issue invalid high school diplomas, staff will confirm that the high school does not appear on that list. (Currently this procedure is N/A, since no such list exists.)

If the Registrar's office does not receive sufficient information to satisfy the above requirements, then the Registrar's office will inform the student that he cannot qualify for aid based on the high school diploma he submitted.

The following is from the FSA Handbook and informs the above policy.

A high school diploma is not valid if it:

1. Did not meet the applicable requirements established by the appropriate state agency, Tribal Agency, or Bureau of Indian Education in the state where the high school is located; (this does not always apply, see below*)
2. Has been determined to be invalid by the Department, the appropriate state agency in the state where the high school was located, or through a court proceeding; or
3. Was obtained from an entity that requires little or no secondary instruction or coursework to obtain a high school diploma, including through a test that does not meet the requirements for a recognized equivalent of a high school diploma under 34 CFR 600.2.

**As per the Department of Education NPRM dated 5/19/2023: "With regard to how these proposed requirements would apply to certain private religious secondary schools, as noted in § 668.16(p)(1)(ii), the process of confirming or receiving documentation from the State or Tribal agency or the Bureau of Indian Education only applies to high schools that are regulated or overseen by one of those entities. Moreover, the proposed requirements establishing when a high school diploma is not considered valid in § 668.16(p)(2)(i) note that the school would have to meet applicable requirements established by the State or Tribal agency or the Bureau of Indian Education. If those entities do not have applicable requirements for the type of school in question, then the diplomas awarded by the school would not be considered invalid simply for that reason.*