

Verification

**Verification**



**IASFAA Conference**

Kim Wells  
U.S. Department of Education

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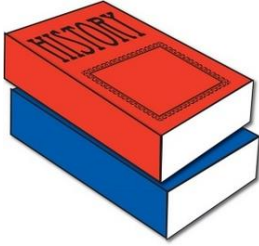
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**Background**



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**Verification – History**

- Last comprehensive look in 1985
- Program Integrity regulations (October 29, 2010)
  - Move toward more customized verification
  - Effective for the 2012-2013 award year
- For the 2012-2013 award year
  - Retained the long-standing five items and added SNAP and child support paid, if reported on the ISIR

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**Verification – History**

- For the 2013-2014 award year
  - Introduced the concept of verification groups
  - Added high school completion and identity/statement of educational purpose as verification items
- For the 2014-2015 award year
  - Eliminated SNAP (V2) as a separate verification group
  - Added household resources group (V6)
  - Added other untaxed income and benefits as a verification item

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**Verification – History**

- For the 2015-2016 award year
  - No changes to verification items and tracking groups
- For the 2016-2017 award year
  - Eliminated Child Support Paid (V3) as a separate verification group
  - In limited circumstances, an applicant's Verification Tracking Group could change

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**2017-18 Verification Changes Overview**



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**Tracking Groups and Data Elements**

- Verification Tracking Group V6 was eliminated for 2017-18
  - Schools still have authority to select additional students and items of their choosing for verification
- SNAP and Child Support Paid removed as individual verification items under V1, V4 or V5

DCL GEN-16-07



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**GEN-17-04 (April 24, 2017)**

- Due to DRT concerns, we are providing institutions with flexibilities they may choose to use as part of their verification procedures for 2016-2017 and 2017-2018:
  - IRS Tax Return Filers – In lieu of using the IRS DRT, or obtaining an IRS transcript, institutions *may* consider a signed paper copy of the 2015 IRS tax return that was used by the tax filer for submission to the IRS as acceptable documentation to verify FAFSA/ISIR tax return information



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**GEN-17-04 (April 24, 2017)**

- Verification of Nonfiling – Institutions are no longer required to collect documentation obtained from the IRS or other tax authorities verifying that the applicant, the applicant’s spouse or the applicant’s parents did not file a 2015 tax return
  - Nonfilers must still provide - a signed statement certifying that the individual has not filed and is not required to file and a listing of the sources of any 2015 income earned and any W-2s, if applicable
- In addition, GEN-17-04 serves as the guidance for alternative documents when a taxfiler is unable to obtain a tax transcript (replaces the 10/18/16 electronic announcement)



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**Use of Documents from 2016-17**

- School can use verification documents from 2016-2017 to meet 2017-2018 requirements for the following items:
  - Adjusted Gross Income (AGI); U.S. Income Tax Paid ; Untaxed Portions of IRA Distributions; Untaxed Portions of Pensions; IRA Deductions and Payments; Tax Exempt Interest Income; Education Credits; Income Earned from Work
- Documentation of high school completion obtained prior to the 2017–2018 award year is acceptable
- Must obtain new documentation for:
  - Number of Household Members
  - Number in College
  - Identity/Statement of Educational Purpose

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**2017-18 Verification Tracking Groups: Data Elements & Documentation**



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**Which Students to Verify?**

- Schools only need verify students who are selected for verification
- Applicants can be selected in two ways:

<p><b>Department Selects</b></p> <ul style="list-style-type: none"> <li>School must verify all students the Department selects</li> <li>Student will be assigned to a verification group, which determines the items to verify</li> <li>ISIR will include verification flag and an asterisk (*) next to EFC</li> </ul>	<p><b>School Selects</b></p> <ul style="list-style-type: none"> <li>Schools may select students not selected by the Dept.</li> <li>May use the same data elements and documents as the Dept., or something else</li> <li>Written policy must address how school selects students and what they will verify</li> </ul>
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**Verification Selection Groups**

- V1 – Standard Verification Group
- V2 – Reserved
- V3 – Reserved
- V4 – Custom Verification Group
- V5 – Aggregate Verification Group
- V6 – Reserved



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**V1– Tax Filers**

- Adjusted Gross Income
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Credits

**Documentation:**

- IRS DRT;
- Tax Return Transcripts;
- Alternate documentation where allowed (e.g. amended returns, foreign returns, etc.)

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**IRS Data Retrieval Tool**

IRS Request Flag	Description
Blank	IRS Data Retrieval Tool not available
00	Student/Parent was ineligible to use the IRS Data Retrieval Tool
01	Student/Parent was presented with the IRS Data Retrieval Tool and elected to use it, but did not transfer IRS data into the FAFSA
★ 02	IRS data was transferred and was not changed
03	IRS data was transferred and changed
04	IRS data was transferred and then changed on a subsequent transaction
05	Student/Parent was presented with the IRS Data Retrieval Tool and elected not to use it
06	IRS data was transferred, but a subsequent change made the student/parent ineligible to use the IRS Data Retrieval Tool

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IRS "Get Transcript Online"

- Allows the user to immediately receive an online PDF version of their IRS Tax Return Transcript or, if appropriate, a verification of non-filing
- New enhanced two-step, multi-factor authentication process requires:
  - access to a valid email address,
  - a text-enabled mobile phone in the user's name, and
  - specific financial account numbers (credit card number, etc.)
- During the new Get Transcript Online registration process, the IRS will send the user a one-time confirmation code via email and an authentication code via text that the user will use to finalize the Get Transcript Online registration

16 July 26, 2016 EA Federal Student Aid PROUD SPONSOR OF THE AMERICAN MIND™

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Tax Filers - Extensions

- Person is required to file, but obtained **extension**, must submit:
 

**Tax Filers Extension Documentation:**

  1. IRS Form 4868 or copy of the IRS's approval to extend beyond October 15 deadline;
  2. W-2 (or Wage and Income Transcript) for each source of employment income; and
  3. If self employed, a signed statement certifying the amount of AGI and U.S. income tax paid; and
  4. Non-Filing Letter from the IRS

*When above documentation reviewed, verification is considered complete (disbursements are valid)*
- School may request transcript/IRS DRT when taxes are filed; must then re-verify income information

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Amended Tax Returns

Individuals who filed an amended tax return must submit the following documents to the institution:

- an IRS Tax Return Transcript, or any other IRS tax transcript(s) that include all of the income and tax information required to be verified; and
- a signed copy of the IRS Form 1040X that was filed with the IRS

Guidance effective 8/13/15 for 15/16 and subsequent years
• Posted on Program Integrity Q & A website

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**V1 – Tax Non-Filers**

- Income earned from work

**Documentation**

- Signed statement certifying the following:**
  - Individual has not filed and not required to file 2015 tax return;
  - Sources of income earned from work and amounts of income from each source for tax year 2015; and
- Copy of IRS Form W-2 (or Wage and Income Transcript) for each source of employment income received for tax year 2015, and**
- Verification of Non-Filing Letter from the IRS**

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**IRS Verification Documentation**

- February 23, 2017 Electronic Announcement*
  - Contains a chart that outlines the verification documents that can be requested from the IRS, the IRS document or response that will result from each request, where the response will be sent, and an estimate of the time for the IRS to respond to the request
  - Verification of Nonfiling (VNF)
    - IRS documents that clearly indicate IRS does not have a tax return record on file for the tax year are acceptable for VNF
      - Includes Tax Return Transcripts/Tax Account Transcripts that indicate "no record of return filed" or "no transcript on file"
      - Includes any version of IRS Form 13873 that clearly states that the form is provided to the individual as verification of nonfiling or states the IRS has no record of a tax return

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**Non-IRS Tax Filers**

*Income Information for Non-IRS Tax Filers*

- Tax filers who filed an income tax return with a taxing authority in a **U.S. territory** (Guam, American Samoa, the U.S. Virgin Islands) or **commonwealth** (Puerto Rico and the Northern Mariana Islands) or with a **foreign central government**, must submit a copy of a transcript of their tax information
  - A signed copy of the applicable 2015 income tax return that was filed with the taxing authority is only acceptable if tax filers are unable to obtain a free copy of a transcript of their tax information

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### Verification

**Verification Q & A**

- DOC-Q28: ...Which tax authorities charge a fee to obtain this information?
- DOC-A28: The tax authorities for Guam, the Commonwealth of the Northern Mariana Islands, the Commonwealth of Puerto Rico and the U.S. Virgin Islands charge a fee to obtain tax account information. Therefore, a tax filer who filed an income tax return with these tax authorities may provide institutions with a signed copy of his or her income tax return that was filed with the relevant tax authority. ...  
...A tax filer who filed an income tax return with tax authorities not mentioned above, i.e. a foreign tax authority, and who indicates that they are unable to obtain tax account information free of charge, must provide the institution with documentation that the tax authority charges a fee to obtain information, along with a signed copy of his or her income tax return that was filed with the relevant tax authority

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**Non-IRS Nontax Filers**

*Income Information for Non-IRS Nontax Filers*

- **Residents of the Freely Associated States** (Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia), or a **U.S. territory or commonwealth** or a **foreign central government** who are not required to file an income tax return under that taxing authority's rules must submit the following:
  - a copy of their Wage and Tax Statement (or equivalent documentation) for each source of employment income and
  - a signed statement identifying all of the individual's income and taxes

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**V1- All Applicants**

- Number in Household & Number in College

**Documentation:**

- **Household size – signed statement (name, age, relationship)**
  - Not required for certain logical assumptions:
    - Dependent student household size reported is 2 and parent is unmarried or 3 if the parents are married or unmarried and living together
    - Independent student household reported is one and applicant is unmarried or two if the applicant is married
- **Number in College – signed statement (name of household member attending at least half-time and eligible institution name)**
  - Not required if reported number is one (student)

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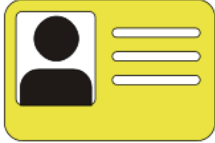
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**V4—Custom**

- High School Completion Status
- Identity/Statement of Educational Purpose

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**High School Completion Status**

Documentation:

- High school diploma; or
- Final official high school transcript showing date diploma awarded; or
- “Secondary school leaving certificate” for students who completed secondary education in foreign country and unable to get copy of high school diploma/transcript
- **Note:** If, prior to being selected for verification, an institution already obtained HS completion status records for other purposes, the institution may rely on those records as long as it meets ED HS completion criteria

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**High School Completion Status**

- For V4 and V5, if institution successfully verified and documented applicant’s high school completion status for a prior award year, verification of high school completion status is not required for subsequent years
- DD Form 214 Certificate of Release or Discharge From Active Duty *may serve* as alternative documentation to verify a student’s high school completion if it indicates that the individual is a high school graduate or equivalent
- An institution may not accept as alternative documentation an applicant’s self-certification

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**High School Completion Status**

In rare cases where it is impossible for a *refugee, an asylee or a victim of human trafficking* to obtain documentation of his or her completion of a secondary school education in a foreign country, an institution may accept self-certification from these applicants

- Q&A FHD-Q2/A2 (program integrity Q & A website under HSD)
- Required information included:
  - Proof of attempt to obtain documentation of their completion of a secondary school education in a foreign country
  - Signed/dated statement that indicates applicant completed secondary school education in a foreign country along with - name and address of foreign high school and date foreign HS diploma was awarded
  - Copy of entry status documentation showing status as a refugee, asylee, or victim of human trafficking and who entered the US after the age of 15

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**High School Completion Status**

Documentation: Recognized equivalent of a HS diploma

- Copy of the student's General Educational Development (GED) certificate, an official GED transcript that indicates the student passed the exam, or a state-authorized HS equivalent certificate; OR
- Academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; OR
- Student excelled academically in HS and met all criteria to be admitted into a 2-year degree program or higher

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**High School Completion Status**

- Test transcripts of State-authorized examinations (e.g., GED test, HiSET, TASC, or other State-authorized high school equivalency examinations) are acceptable documentation of high school completion only if:
  - The official test transcript specifically indicates that a state has determined that the test results are considered by the State to meet its requirements of high school equivalency;
  - OR
  - The official test transcript includes language that the final score is a passing score

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**High School Completion Status**

- Documentation: Homeschooled
- Transcript, or the equivalent, signed by the parent or guardian, that lists the secondary school courses completed by the applicant and documents the successful completion of a secondary school education;
- OR
- A secondary school completion credential for home school provided for under State law

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**Identity/Statement of Educational Purpose**

- Documentation: students that appear in person
- Present to an institutionally authorized individual
  - A valid NON-EXPIRED government-issued photo ID; and
    - *Cannot use military IDs*
    - *Does NOT have to be Real ID Act compliant (DOC-Q26)*
  - A signed statement of educational purpose
    - Provided by ED, cannot be modified
- Maintain, an annotated copy of the identification:
  - The date documentation was received; and
  - The name of the institutionally-authorized individual that obtained the documentation

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**Identity/Statement of Educational Purpose**

Documentation: student unable to appear in person

- Must provide the institution—
  - Copy of valid NON-EXPIRED government-issued photo ID
    - *Cannot use military IDs*
    - *Does NOT have to be Real ID Act compliant (DOC-Q26)*
- AND
- An *original*, notarized statement of educational purpose signed by the applicant (no online notaries allowed)
  - Cannot be faxed or scanned
  - After examining *original* Statement of Educational Purpose, institution may convert it to an electronic record

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**V5 – Aggregate**

- High School Completion Status
- Identity/Statement of Educational Purpose

**AND**

- All items indicated-Tax Filer (V1)
- All items indicated-Non-Tax Filer (V1)

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**V4/V5 Tracking Results**

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**V4/V5 Tracking Results**

- The V4 and V5 tracking process in FAA Access that began in the 2014-15 processing year WILL CONTINUE for 2017-2018
- Schools need to select the proper award year for which they are providing results
  - 2016-17, 2017-18, etc.

<https://faaaccess.ed.gov>

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**V4/V5 Tracking Results**

Use the **Identity Verification Results** section on the FAA Access home page

The screenshot shows the 'FAA Access to CPS Online' interface. A red arrow points to the 'Identity Verification Results' link in the 'Welcome to the FAA Main Menu' section. The page includes navigation links like 'Home', 'FAQs', and 'FAA Access to CPS Online'. The main menu lists various options such as 'Student Identity', 'Application Entry', 'Restore a Saved Application', 'Identity Verification Results', 'CPS Enrollment', 'Request FERPA data', 'CPS Response Tool', 'Review of the Data on the Site', 'Calculate and manage the Return of Title IV Funds', and 'High School FAFSA Completion of Post-Secondary Costs Request and View High School FAFSA Completion data'.

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**V4/V5 Tracking Results**

**Whom to report:** student for whom school received an ISIR with a Verification Tracking Group of V4 or V5 AND for whom school requested verification documentation

- Do NOT include students the school selected for verification of identity or high school completion status

**When to report:** 60 days following the institution's first request to the student to submit the required V4 or V5 identity and high school completion documentation

- Changes to previously submitted Identity Verification Results must be updated within 30 days

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**NEW V4/V5 Tracking Results – 2017-18**

New Value #6 added to drop down options for 2017-18:

- Dropdown options for 2017-18 will now be:
  - Verification completed in person, no issues found
  - Verification completed remotely, no issues found
  - Verification attempted, issues found with identity
  - Verification attempted, issues found with HS completion
  - No response from applicant or unable to locate
  - Verification attempted, issues found with both identity and HS completion**

Elec. Ann. – 8/19/16; 11/18/16 | Federal Student Aid | PROUD SPONSOR of the AMERICAN MIND™

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**2017-2018 Verification**

Suggested Text



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**Suggested Text – EA 7/29/16**

- Contains 3 appendices to assist with crafting school verification documents to gather verification data
- Appendix A – Suggested Text
  - Not required to use ED’s suggested text and formats
  - **ONE EXCEPTION – institutions must use the exact language provided in the “Statement of Educational Purpose” (Groups V4 & V5)**
- Appendix B – Table of verification items
- Appendix C – Verification tracking groups and FAFSA verifiable information

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**2018-19 Verification Changes Overview**



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**2018-2019 Verification**

- May 5, 2017 Federal Register
  - No changes to verification tracking groups
  - Tax extenders must now show IRS proof of extensions beyond automatic 6-month extension
  - *Dependent students* who do not file taxes, do not have to provide proof of nonfiling

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**2018-2019 Verification**

- May 5, 2017 Federal Register
  - An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau

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**2018-2019 Verification**

- May 5, 2017 Federal Register
  - Remind schools that students selected for verification that qualify for an auto zero EFC have reduced requirements –
    - For dependent students
      - The parents' AGI if the parents were tax filers
      - The parents' income earned from work if the parents were nontax filers; and
      - The student's high school completion status and identity/ statement of educational purpose, if selected

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**2018-2019 Verification**

- May 5, 2017 Federal Register
  - Remind schools students selected for verification that qualify for an auto zero EFC have reduced requirements:
    - For independent students
      - The student's and spouse's AGI if they were tax filers
      - student's and spouse's income earned from work if were nontax filers
      - The student's high school completion status and identity/ statement of educational purpose, if selected; and
      - The number of household members to determine if the independent student has one or more dependents other than a spouse

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**Resources**

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**Resources**

**Federal Student Aid Handbook**

- Application and Verification Guide – Chapter 4 (2017-18 AVG is coming soon!)

**Federal Register**

- April 1, 2016 (2017-18 verification items & documentation)
- May 5, 2017 (2018-2019 verification items & documentation)

**Dear Colleague Letters**

- GEN-16-07 (4/5/16) - 2017-18 verification items and documentation
- GEN-17-04 (4/24/16) – adjustments to 16/17 and 17/18 documentation

**Electronic Announcement**

- July 29, 2016 (2017-18 suggested verification text)
  - <https://ifap.ed.gov/eannouncements/072916VerificationSuggestedTextPackageFor20172018.html>

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**Resources**

**Program Integrity Q & A Website (Verification)**


- <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>

**FSA Assessments**

- <http://ifap.ed.gov/qahome/qaassessments/fsaverification.html>
- Activity 3 – Verification Codes

**Federal Regulations**

- 34 C.F.R. § 668 Subpart E (668.51 – 668.61)
- 34 C.F.R. § 668.16(f)



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**Contact Information**

For questions about this presentation:

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Your Region X Training Officer through January 2018:  
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**Training Feedback**

To ensure quality training we ask all participants to please fill out an online evaluation

<https://www.surveymonkey.com/r/KimberlyWells>

Please provide any comments regarding this training or the trainer to:

Jo Ann Borel, Title IV Training Supervisor  
[joann.borel@ed.gov](mailto:joann.borel@ed.gov)

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