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# Verification Policies 2024-2025

## **Verification:**

Verification is a process required by the Department of Education that confirms the information you and/or your parents provided on the Free Application for Federal Student Aid (FAFSA).

# **Applications Selected for Verification:**

Carl Albert State College (CASC) verifies all applications selected by the Central Processing System (CPS). In addition, students who submit conflicting or incomplete information may be selected for verification by a CASC Financial Aid Counselor. Students selected for verification will be asked to provide supporting documentation of income, household size, number in college, taxed or untaxed income and benefits, or any combination of these to verify the data provided on the FAFSA. Students should not submit any tax documents or other verification documents unless it is requested by the Office of Financial Aid. Students requesting special consideration for unusual circumstances must complete verification, if selected, before any type of adjustment will be considered.

# <u>Items to be Verified/Acceptable Documentation:</u>

The CASC Office of Financial Aid requires appropriate documentation based on the guidelines published in the Federal Student Aid Application and Verification Guide. Students selected for verification are placed in one of the following groups. These groups determine what information must be verified.

# Types of Verification:

- <u>V1 Standard Verification Group</u>: Students in this group must verify the following:
  - Tax filers:
    - ✓ 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
    - ✓ Household size
    - ✓ Number in college
  - Non tax filers:
    - ✓ Income earned from work
    - ✓ Household size
    - ✓ Number in college
    - ✓ Other untaxed income (if no income is reported)
    - ✓ IRS letter of non-filing (excluding dependent students)

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- <u>V4 Custom Verification Group</u>: Students in this group must verify the following:
  - ➤ Identity/Statement of Educational Purpose\*\*
- <u>V5 Aggregate Verification Group</u>: Students in this group must verify the following:
  - ➤ Identity/Statement of Educational Purpose\*\*
  - items in the V1 Standard Verification Group.
- <u>School Selected Verification Group</u>: Students in this group must verify some, all, or a combination of the following depending on the scope of the conflicting information:
  - Tax filers:
    - ✓ 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
    - ✓ Household size
    - ✓ Number in college
    - ✓ Any other conflicting information requested by the school
  - Non tax filers:
    - ✓ Income earned from work
    - ✓ Household size
    - ✓ Number in college
    - ✓ Income/support received if no income earned from work
    - ✓ IRS letter of non-filing (excluding dependent students)
    - ✓ Any other conflicting information requested by the school
- <u>Changing Tracking Groups</u>: Students may move from group V1 or V4 to group V5 based on corrections made to the FAFSA information. If verification was already completed for the previous group, the student is only required to verify the V5 information that was not already verified. If verification was not completed for the previous group, the student needs to verify all of the V5 information.

# \*\*Per Electronic Announcement: (APP-25-16) Posted Date June 06, 2025

Significant Actions to Prevent Fraud through Identity Verification

# Changes to Identity Confirmation Requirements for V4 and V5 Verification

As part of the Department's fraud prevention efforts, we will also make several significant changes to the acceptable documentation for identity verification that must be maintained by schools when they perform V4 or V5 verification. Overall, these changes are intended to streamline the verification process and focus on fraud prevention efforts. As of the publication date of this Electronic Announcement:

- 1. Schools are *no longer required* to obtain a Statement of Educational Purpose from students who are selected for V4 or V5 verification.
- 2. If an institution determines that an applicant is unable to appear in person to present an unexpired, valid, government-issued photo identification, the applicant can now have the option of appearing on a video call to present an unexpired, valid, government-issued photo identification to an institutionally authorized individual who will review the identification. The applicant can still, but will no longer be required to, submit a copy of their identification document that is acknowledged in a notary statement or that is

presented to a notary. The video call option will require the institution to maintain a scanned copy (electronic or hardcopy) of the identification documentation that includes the date it was presented and the name of the authorized representative that reviewed the documentation. This can be accomplished through a screenshot of the video call that has legible details of the identification.

- While we will not require a copy of the ID used with a notary, we will still need the original signed form.
- If we have reason to believe a student is actually incapable of appearing in person on campus or with a notary to verify their identity, they must:
  - 1. **Send us a copy of their valid ID, front and back.** (This can be scanned to financial aid or a picture can be taken and emailed.)
  - 2. Schedule a Zoom call with the Director of Financial Aid and show their valid ID on the call. (A copy of the ID must be received before the scheduled call.)
- 3. The Department will consider a student's identity to be verified if the student's identity was verified by an entity that is compliant with National Institute of Standards and Technology (NIST) Identity Assurance Level 2 (NIST IAL2). In this instance, an institution must retain documentation of the date that the student's identity was verified and the entity that performed the verification. More information on these requirements will be provided in the future.
- 4. The Department will consider a confined or incarcerated student's identity to be verified if the student's identity was verified by a responsible official at the facility where the individual is confined or incarcerated. In this instance, an institution must retain as documentation an electronic or paper confirmation of the student's identity verification, the responsible individual at the facility and the name of the institutional authorized representative who performed the verification.

These options will also apply to students who were selected prior to the date of this announcement. As a reminder, to complete V4 or V5 verification, an applicant must present an unexpired, valid, government-issued photo identification to an institutionally authorized individual. More information about acceptable documentation can be found in the Federal Student Aid Handbook's Application and Verification Guide, Chapter 4, under Acceptable Documentation.

**Types of Documentation:** The documentation needed for verification varies according to the item verified. **Tax Verification:** 

#### • IRS Data Retrieval Tool:

- Available on <u>studentaid.gov</u> while completing the FAFSA. Eligible parents and students are encouraged to use this tool to transfer tax data from the IRS to the FAFSA.
- It is the fastest, easiest, and most secure method of meeting verification requirements.
- > Students and parents who file a joint tax return will not be able to transfer their income earned from work but will have to manually enter those amounts.

#### • IRS Data Retrieval Tool may not be available if:

- Marital status has changed since filing the return.
- If the parent or student is married and filed tax returns either as "head of household" or "married but filing a separate return".
- If the parents' marital status is "unmarried and both legal parents living together".
- > If an amended tax return was filed.
- If the student or parent has been a victim of identity theft.
- > If the home address on the FAFSA does not match the address on the tax return.

- > If the parent or student did not indicate on the FAFSA that the tax return has been completed.
- ➤ If the first three digits of the SSN are 666.
- ➤ If the student or parent filed a Puerto Rican or non-U.S. tax return.
- > If neither married parent entered a valid SSN.
- ➤ If a non-married parent or both married parents entered all zeros for the SSN.

### • Federal Tax Return Transcripts:

- Applicants unable to use the IRS Data Retrieval tool or who change the data transferred may obtain an **IRS Tax Return Transcript** at <a href="https://www.irs.gov">www.irs.gov</a> or by calling IRS at 1-800-908-9946.
- ➤ In June, 2016, the IRS announced the relaunch of its Get Transcript Online tool, which allows you to immediately receive an online PDF version. It is available at <a href="www.irs.gov">www.irs.gov</a> under the "Tools" tab by clicking "Get a tax transcript" and then "Get Transcript Online.
- You may also request a paper copy that will be mailed at <u>www.irs.gov</u>.
- ➤ If your marital status has changed after filing the tax return, you filed an amended tax return, filed for extension, or are unable to obtain an IRS Tax Return Transcript due to identity theft, contact the Financial Aid Office for more information.
- ➤ The Department of Education is again allowing Financial Aid Offices to accept copies of the 1040 Form.

#### Household Verification:

- Verification Worksheets (Dependent or Independent):
  - > Standard Verification Worksheet
    - ✓ V (selected by school), V1 and V5 Verification Categories
      - Tax filer or non-filer status
      - Household Size
      - Number in College

#### **Identity Verification:**

- Verification Worksheets (Dependent or Independent):
  - ➤ Identity/Statement of Educational Purpose Verification
    - V4 and V5 Verification Categories

#### **Income Verification:**

- If a student's FAFSA shows there is no income earned from work or income received, they will be required to submit:
  - ➤ IRS Letter of Non-filing
    - V4 and V5 Verification Categories
  - ➤ Low Income Verification Worksheet
    - V4 and V5 Verification Categories
- W2's are required if there is income earned from work but a tax return was not filed.

#### Other Information:

• Additional information may be requested depending on Student Aid Report (SAR) Comment Codes listed on the FAFSA or to clear up any issues or discrepancies.

# Reporting Results for Groups V4 and V5:

• CASC must report the verification results of identity status for any student for whom CASC has received an ISIR with tracking flag V4 or V5—as selected by the CPS, not the school—and request verification

documentation. CASC reports this information on the FAA Access to CPS Online website. CASC will then enter one of the following numeric codes that most applies to the student:

- > 1-Verification completed in person, no issues found
- > 2-Verification completed using notary, no issues found
- > 3-Verification attempted, issues found with identity
- > 5-No response from applicant or unable to locate

#### **Verification Process:**

- CASC receives FAFSA data from the federal government daily.
- The Financial Aid Office emails a Welcome Letter to all applicants confirming their FAFSA has been received.
- Documents may be downloaded from the student's myCarlAlbert Self-Service portal or from the CASC financial aid webpage on carlalbert.edu.
- Applicants should submit all requested documents as soon as possible after receiving the missing documents email to avoid delays in processing their aid.
  - o Refer to deadlines and consequences sections for more information.
- When the applicant has submitted all requested documents, the Financial Aid Counselor will complete the verification process. At that time, the Counselor may request additional documentation to clear up any conflicting or inconsistent information.
  - o The review process usually occurs within two to three weeks of receipt of the final documentation.
- Corrections are required if the information indicated on the submitted documents does not match the data entered on the FAFSA. The Financial Aid Counselor will submit corrections on the student's behalf by sending them electronically to the U. S. Department of Education system.
  - o Generally, the corrected data is processed within 72 hours after the corrected data is submitted and CASC usually receives the updated FAFSA within a week.
- After receiving the corrections electronically, if all documentation has been submitted and all eligibility criteria have been met, the Financial Aid Counselor will award the student and an Offer Letter will be emailed to the student's CASC email.

# Professional Judgement for Special Cases:

A Financial Aid Administrator may use Professional Judgement (PJ) on a case-by-case basis only to adjust the student's cost of attendance or the data used to calculate the student's EFC.

- For students who were selected for verification (by the Financial Aid Office or the Department of Education), the verification process must be complete before exercising Professional Judgement. However, using PJ does not require the aid administrator to verify the student's application if s/he was not already selected for verification.
- <u>Dependency Override</u> (DO) requires financial aid form, *Dependency Override Request*, and supporting documents
  - O Situations where a DO may be warranted:
    - Abandonment by parents
    - Abusive environment that threatens the student's health or safety
    - The student is unable to locate his parents
  - O Situations that may be a result of the above conditions but *do not* necessarily warrant a DO:
    - Parents refuse to contribute to the student's education

- Parents are unwilling to provide information on the FAFSA or for verification
- Parents do not claim the student as a dependent for income tax purposed
- Student demonstrates total self-sufficiency
- Parental Data Override (PDO) requires financial aid form, Parental Data Override Form, and may require supporting documents
  - Students without parent support who do not qualify for a Dependency Override may instead qualify for a Parental Data Override. These situations would include:
    - Parents are unwilling to provide information on the FAFSA or for verification
  - o Students who qualify for this override will be able to receive <u>federal direct unsubsidized loans only</u>.
- <u>Special Condition (SC)</u> requires financial aid form, *Special Condition Application*, and supporting documents
  - o If there has been a change in the student's/student's family's financial situation that may impact their ability to pay, they may qualify for an EFC adjustment. Situations for eligibility may include:
    - An Involuntary Loss of Job or Benefits
      - Must attach appropriate 2023 or 2024 Federal Tax Return Transcript with W2's
    - Change in Marital Status
      - Must attach a copy of the Marriage License and Student's/Spouse's 2023 Federal Tax Return Transcript and W2s
    - Separation or Divorce
      - Must attach a copy of legal documentation and Student's/Spouse's 2023 Federal Tax Return Transcript and W2s
    - Death of a Spouse
      - Must attach a copy of the obituary or death certificate

# **Deadlines & Consequences for the 2024-2025 Award Year:**

Students selected for verification should submit required paperwork as quickly as possible to avoid delays in processing aid.

#### **Deadlines:**

- The Department of Education's Central Processing System (CPS) must receive a:
  - o FAFSA by June 30, 2025
  - Signature page for the FAFSA (if required), FAFSA correction, notice of a change of address or school, or request for a duplicate SAR must be submitted to the federal government's processor by September 15, 2025.
- CASC must receive:
  - Valid FAFSA with an official EFC by the student's last date of enrollment or by September 21,
     2025, whichever is earlier.
  - Verification documents from students selected for verification by the federal government or by the school no later than 120 days after the last day of enrollment or September 21, 2025, whichever is earlier.
- CASC may not make a late disbursement later than 180 days after the student was no longer enrolled.
- Student loans must be originated by the last day of the loan payment period.
  - The CASC Financial Aid Office must receive the **Student Loan Request** by the Friday before Finals Week to be considered for a loan.

- The student must complete Entrance Counseling, Master Promissory Note, AND the student must accept their Offer Letter by the last day of the loan payment period before the loan can be originated and disbursed.
- If a student is selected for verification after aid has been awarded and disbursed, the student must complete the verification process within the same timeframe in order to remain eligible.
  - o Failure to complete verification or if the verification does not justify aid already disbursed, the student is responsible for repaying all aid they are not eligible for.

## Consequences for Failing to Submit Documents in Time:

- The application cannot be processed and federal aid will not be awarded.
- The student is responsible for paying his/her tuition, fees, and other institutional charges out of pocket.
- The student may be left with an outstanding balance that would prevent them from enrolling in future semesters.

# **Inspector General Notification:**

CASC refers to the Office of Inspector General for investigation cases as follows:

- After conducting the review of an application, the college has credible information indicating that an
  applicant may have engaged in fraud or other criminal misconduct in connection with the aid application.
  The type of information that an institution must refer is that which is relevant to the eligibility of the
  applicant for Title IV, HEA program assistance, or the amount of the assistance.
  Examples of this type of information are:
  - False claims of independent student status;
  - > False claims of citizenship;
  - > Use of false identities;
  - > Forgery of signatures or certifications; and
  - > False statements of income
- Any credible information indicating that any employee, third-party servicer, or other agent of the college
  that acts in a capacity that involves the administration of the Title IV, HEA programs, or the receipt of
  funds under those programs, may have engaged in fraud, misrepresentation, conversion or breach of
  fiduciary responsibility, or other illegal conduct involving the Title IV, HEA programs. The type of
  information that an institution must refer is that which is relevant to the eligibility and funding of the college
  and its students through the Title IV, HEA Programs.