Verification Policy

Policy Rationale

The U. S. Department of Education requires that Federal Title IV applicants provide documentation to verify the accuracy of the information submitted on the Free Application for Federal Student Aid (FAFSA) each year. Federal regulations include verification as part of the Federal Student Aid (FSA) program requirements, and it is required for applicants for most FSA programs with the exception of students receiving only a parent or graduate PLUS loan or an unsubsidized Stafford loan. Each college is required to have policies for verifying the reported information. Federal regulations can be found at:

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Federal Student Aid Handbook
Application & Verification Guide
Chapter 4: Verification, Updates, and Corrections
34 CFR 668.51-61

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Verification

Verification is the process the Financial Aid department uses to compare the information provided on the Free Application for Federal Student Aid (FAFSA) with the documentation provided by the selected student.

Selection of Applicants to be Verified

1. The College will verify applicants selected by the U. S. Department of Education via federally approved edits.
2. The College will verify all Title IV eligible applicants selected by the U. S. Department of Education for verification.
3. The College will verify all applicants selected by the U.S. Department of Education, even if previously verified by another institution.
4. The College will verify any applicant with missing, inaccurate, or conflicting information.
5. The College may select any applicant for verification if the validity of the information is questioned.

Any students with unusual circumstances or who have indicated a significant change in household size or income due to death, illness or involuntary employment change or loss may be reviewed for Professional Judgment if requested by the student.

CampusLogic

Southern Crescent Technical College will begin using CampusLogic Summer 2021 to review and process all verification, C-Flag and other documentation required by the Department of Education. Institutional Student Information Record (ISIR) records are loaded into CampusLogic and requirements are assigned to the student by evaluating each student's comment code on the ISIR. Students are then required to create a CampusLogic account and complete/upload any outstanding requirements.

Data Elements to be Verified (GEN-18-03)

Applicants who are selected for Verification are placed in different Verification groups by the Department of Education. Requirements are posted for each student based on Verification items required for that group based on federal regulations.

Verification groups are as follows:

V1—Standard Verification Group. Students in this group must verify the following if they are tax filers:

Tax Filers:

- Adjusted Gross Income (AGI)
- U.S. Income Tax Paid
- Untaxed Portions of Individual Retirement Account (IRA) Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Tax Credits

Nontax Filers:

- Income Earned from Work

Tax Filers and Nontax Filers

- Number of Household Members
- Number in College

V4—Custom Verification Group. Students must verify:

- Identity/Statement of Educational Purpose

V5—Aggregate Verification Group. In addition to the items in the Standard Verification Group, students must verify:

- Identity/statement of educational purpose

V2, V3, V6— Reserved for future use by the Department.

Reporting results for groups V4 and V5

Southern Crescent Technical College will report the verification results of identity for any student for whom you receive an ISIR with tracking flag V4 or V5—as selected by the CPS, and request verification documentation. Students will provide documentation via CampusLogic and present to the school to verify in person (see below list). Southern Crescent Technical College will report the results in CampusLogic and will be transmitted to CPS Online website:

1. verification completed in person, no issues found
2. verification completed remotely, no issues found
3. verification completed using notary, no issues found
4. verification attempted, issues found with identity
5. verification attempted, issues found with HS completion
6. no response from applicant or unable to locate

Southern Crescent Technical College, may at its discretion, if inaccuracies are suspected, require a student to verify any FAFSA information and to provide any reasonable documentation in accordance with consistently applied school policies.

Acceptable Documentation & Forms
Required documentation will vary from student to student based on several factors, including: dependency status, income thresholds, comment codes, reject codes, and ISIR flags. The applicant must submit all required documents and forms to the Financial Aid department by the posted deadline. If the applicant fails to submit documentation in the specified time range, the application may go un-reviewed, and the student may not be eligible for financial aid during that academic year of enrollment.
General Verification forms are requested based on specific Verification Groups and are used to verify specific information as follows:

- **Independent Verification Worksheet-** used to verify student and/or spouse's household size, number in college, wages for non-income tax filers.
- **Dependent Verification Worksheet –** used to verify student and parent's household size, number in college, wages for non-income tax filers.

Statement of Educational Purpose Worksheet – used to verify that any financial assistance the student receives will be used for educational purposes and cost of attending. Applicants who were selected to verify identity and to sign a statement of educational purpose are required to appear in person at the Financial Aid Office with a non-expired, government-issued photo id (i.e. US passport, driver's license or another state-issued ID) to complete the **Identity and Statement of Educational Purpose** form. Applicants who are unable to appear in person must go to a notary public to sign the **Identity and Statement of Education Purpose Notary form**. The original form along with a copy of the non-expired, government-issued photo ID presented to the notary must be mailed or hand-delivered to the Financial Aid Office. Faxed copies, photocopies, emailed pdf, etc. are not acceptable.

Special Note: The following guidance applies to verification of identity and Statement of Educational Purpose and is from the April 3, 2020 Electronic Announcement (bolded for emphasis):

"For those [students] in verification groups V4 or V5, the flexibilities listed below apply if the institution is **unable to receive the required documents in person or by mail** (e.g., qualified staff are not on campus to complete this task or students are not able to mail documents). These flexibilities also apply if the applicant or student is **unable to provide the required documents in person or cannot provide notarized documents by mail**.

- **Verification of Income – Students have three ways to verify income:**

Data Retrieval Tool (DRT)- When completing the income sections of the FAFSA, the applicant is given the option to have this **data retrieved directly from the IRS.** If the applicant decides not to use the **IRS Data Retrieval Tool** and the application is chosen for verification, the applicant and the parents, if applicable, will be required to submit an IRS Tax Return

If the IRS tax retrieved information is changed on the FAFSA, the applicant will be required to submit an IRS Tax Return Transcript. The IRS data can be retrieved by the applicant when a correction is made to the FAFSA, after the first transaction.
If the retrieved data is not changed, then an IRS Tax Return Transcript may not be required.

Tax Transcript- Students may submit a tax return transcript request to the IRS on the following site **irs.gov/individuals/get-transcript** .

Copy of Tax Return- Students may provide a signed paper copy of the required tax return information that was submitted to the IRS when taxes were filed.
Special Note: The Department of Education released an electronic announcement stating schools can now accept signed copies of tax returns and self-certification of non-filing to complete verification. This is effective as of January 9, 2019.
What this means is that students selected for verification have two options in which to provide theirs, their spouse (if married), or parents (if considered dependent) 2 years-prior tax return information (2020 for 2022-23 or 2021 for 2023-2024) tax return information to our office –

IRS Verification of Nonfiling Letter- As part of the verification process for financial aid, the Department of Education requires that people who do not file taxes submit an IRS letter of nonfiling status to the college. A nonfiling letter will be necessary for all parties in the custodial household (i.e. student, spouse, parent 1, or parent 2) that did not file taxes.

What is an IRS Verification of Nonfiling Letter?
An IRS Verification of Nonfiling Letter (VNF) will provide proof from the IRS that there is no record of a filed tax form (1040, 1040A, or 1040EZ) for the appropriate tax year. A VNF does not provide proof that student was not required to file, only that the student (spouse and /or parent) did not file. For any academic year in which your FAFSA is selected for verification and you reported "Will not file," you will need to request a VNF for the prior-prior year (eg. for 2019-2020, request a VNF for 2017).
Non-Tax filers can request an IRS Verification of nonfiling, free of charge from the IRS in one of two ways:
- Online
- Mailing form 4506T to the IRS

Additional Documentation (requested for various reasons)

        Marital Status Marriage Certificate
                Divorce Decree
                Legal Separation
                Documentation of separation from spouse

        Miscellaneous
                Child Support received/paid
                Birth Certificates
                Monetary Support Documentation
                Worker's Compensation benefits
                HUD
                Homeless documentation
                Court Documents Issuing Legal Guardianship
                Third Party Letters of Support or Explanation
                Other

The above listed documentation is not all inclusive. Documentation will vary depending on the student's situation and what the Financial Aid staff feel is necessary to prove the information is accurate and to resolve any conflicting information.

Review of Subsequent/Pushed ISIR Transactions – Post screening
Per federal regulations, Financial Aid is required to review all subsequent ISIR transactions, even if the earlier transaction was already verified. Anytime a "C" flag changes or NSLDS data has been modified, the Financial Aid Office must resolve any conflicts:

- First determine if the EFC or the "C" flags have changed or if there are new comments or NSLDS information. If there are no change with the EFC, "C" flags or NSLDS information, no action is required.
- If the EFC does change but it either does not affect the amount and type of aid received, or the data elements that changed were already verified, no action is required.

Applicant Responsibility
    1. Applicants selected for verification by the U. S. Department of Education are required to provide requested information or documentation in order to be eligible to receive Title IV student aid funds.
    2. If a Pell or campus-based program applicant's dependency status changes during the award year, or the original application was filed incorrectly, including marital status, the

applicant must provide documentation to the OFA and the OFA will make the necessary change. Marital status cannot be updated unless the student made an error when initially submitting their FAFSA. Documentation must be provided for any changes to be made.

3. The applicant must repay any overpayment discovered during verification or updating.

Time Period

1. Applicants selected for verification either by the U. S. Department of Education or the College must provide the requested information or documentation no later than the deadline set by the Office of Financial Aid in order for aid to be available when classes begin. Documentation received after the deadline will be processed in a timely manner.

2. Extension of time will be on an individual basis. Financial aid files are reviewed and processed in the order they are received.

Consequences for Failure to Provide Documentation

1. The College may not disburse any Title IV funds for applicants who fail to provide requested documentation.

2. The College will withhold funds for those who are selected for verification and who fail to provide the requested documentation within a specified period.

3. The College will accept requested documentation after priority deadlines and will award aid in a timely manner when verification is complete.

Notification

1. The College will inform the applicant of verification procedures and requirements through written (tracking letter), electronic, and/or verbal communication. The student is notified of the necessity of verification on the SAR/ISIR.

    a. The OFA will sends emails to students' Southern Crescent Technical College student email account, as well as their personal email address, if one is recorded in BANNER, instructing students to check their BannerWeb account for verification requirements.

2. The College will notify the applicant of the results of verification via CampusLogic, text message, email, and/or verbal communication. Award notifications are sent to students via text message and email.

C-Flags

1. C-Flags on the FAFSA are assigned a missing document(s) requirement via CampusLogic and/or Banner and a tracking letter is emailed to the student to notify of the requirement. C-Flags that are reviewed:

    a. Social Security Administration

    b. Department of Homeland Security

    c. Selective Service- Required for state aid

    d. National Student Loan Data System

2. C-Code File Review

Financial Aid Specialists are required to review federal c-code data match information and resolve any discrepancies. The documentation must be maintained in the student's financial aid file. If students submit documentation which appears fraudulent, the financial aid staff member must notify the Assistant Director of Financial Aid.

The student's documentation is reviewed in the following manner:

1. Documentation is reviewed by Financial Aid Specialist
2. If additional documentation is needed, the Financial Aid Specialist/Technician contacts the students.
3. If documentation is complete and accurate, the Financial Aid Specialist/Technician processes the student's aid.

Special Note: Based on guidance from the Department of Education, on July 13, 2021, the college began waiving verification requirements for students in the V1 verification group unless there was conflicting information. The college continues to verify students in the V4 and V5 (only V4 verification processed). See guidance data below:

COVID-19 Title IV Flexibilities and Waivers as of January 15, 2021.

COVID-19 Relief/Flexibility	Timeframe Applicable	Citation
Verification: • Permits various flexibilities with V4/V5 documentation • Waives signature requirements where no responsible parent can be found • Flexibilities in verification of non-filing and obtaining duplicate W-2 forms from IRS • Institution may use documentation of HS completion it has already obtained for V4 and V5, and may accept a signed, dated statement from the applicant attesting to completion of high school	Applicable through the end of the payment period that begins after the date on which the Federally declared national emergency related to COVID-19 is rescinded. Applies to any award year for which verification is being performed during that timeframe.	April 3, 2020, Electronic Announcement May 15, 2020, Electronic Announcement July 9, 2020, Electronic Announcement August 21, 2020, Electronic Announcement December 11, 2020, *Federal Register* Notice Initial flexibilities were announced in the April 3, 2020, Electronic Announcement. High school completion flexibilities were discussed in the May 15, 2020, Electronic Announcement. Flexibilities related to signature requirements and W-2 forms were announced in the July 9, 2020, Electronic Announcement. We further clarified the period of eligibility in the August 21, 2020, Electronic Announcement. Finally, the December 11, 2020, *Federal Register* (HEROES) Notice extended verification flexibility where a parental signature cannot be obtained. All verification flexibilities will conform to the applicable timeframe indicated.
Final Disbursement Reporting Deadlines: • Upon request, the Department will extend the	N/A	April 3, 2020, Electronic Announcement August 21, 2020, Electronic Announcement

April 3,2020, Electronic Announcement

May 15, 2020, Electronic Announcement

July 9, 2020, Electronic Announcement

August 21, 2020, Electronic Announcement

December 11, 2020, Federal Register Notice   Received 12/14/2022