



### **Verification Policy**

All students who have completed a FAFSA are subject to verification of the information submitted when completing their application. This verification must be completed before the student can receive federal aid. Verification flags are noted on a student's SAR or the ISIR received by the school.

Schools have the authority to contact students for documentation and information needed to address verification requirements and student must comply with the requested information. Student must submit the required documents requested for verification within the established timelines to maintain eligibility for federal financial aid. The verification process is in accordance to Title 34, Articles 668.51-61, of the Code of Federal Regulations (CFR). An applicant whose FAFSA information is selected for verification is required to complete verification before the Institution exercises any Professional Judgment adjustments to the applicant's cost of attendance (COA) or to the value of the data items required to calculate the EFC.

### **APPLICATIONS AND INFORMATION TO BE VERIFIED**

The Department's long-term goal is for a customized approach to verification. A menu of potential verification items for each award year will be published in the Federal Register, and the items to verify for a given application will be selected from that menu and indicated on the student's output documents. Output documents will continue to include only one verification flag to show students who were selected, and they will need to verify all the FAFSA items shown in the margin that apply to them. The verification flag will have a value of "Y," and next to the EFC will be an asterisk referring to a comment in the student section of the SAR that tells applicants they will be asked by their schools to provide documentation. A verification tracking flag will be set on the applicant's Institutional Student Information Record (ISIR) to indicate placement in one of the current award year verification tracking groups.

In some cases, DSDT, not the CPS, will select a student for verification. DSDT must verify any information DSDT has, if/ any, reason to believe is incorrect on any application. At DSDT discretion, we may require a student to verify any FAFSA information and to provide any reasonable documentation in accordance with consistently applied school policies. In either situation DSDT may, but are not required to, include any of the current award year CPS verification items not already included. Even DSDT doesn't select for verification, students with these applications are considered selected for verification and, as with CPS-selected applications, all other verification requirements, such as deadlines, allowable tolerances, and interim disbursement rules, apply.

Verification items for current award year 34 CFR 668.56 The verification items for current award year remain for current award year:

- Adjusted gross income (AGI)
- U.S. income tax paid
- Education credits
- Untaxed portions of IRA distributions
- Untaxed portions of pensions
- IRA deductions and payments
- Tax-exempt interest
- Income earned from work
- Household size
- Number in college
- Identity/statement of educational purpose

Verification tracking groups Students who are selected for verification will be placed in one of the following groups to determine which FAFSA information must be verified.

V1—Standard Verification Group. Students in this group must verify the following if they are 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
- Household size
- Number in college

Students who are *not tax filers* must verify the following:

- Income earned from work
- Household size
- Number in college

**V4—Custom Verification Group.** Students must verify identity/statement of educational purpose (SEP).

**V5—Aggregate Verification Group.** Students must verify identity/SEP in addition to the items in the Standard Verification Group (V1).

Groups V2, V3, and V6 are reserved for future use by the Department.

### **Changing tracking groups**

A student may move from Verification Tracking Group V1 or V4 to group V5 based on corrections made to his or her CPS record or on other information available to the Department. 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 the V5 information. No disbursements of Title IV aid may be made until the V5 verification is satisfactorily completed. If the student doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The student is liable for the full amount because without verification there is no evidence, he or she was eligible for that aid.

If the applicant doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The applicant is liable for the full amount because without verification there is no evidence, she was eligible for that aid.

### **Reporting results for groups V4 and V5**

DSDT must report the verification results of identity for any student for whom you (1) receive an ISIR with tracking flag V4 or V5—*as selected by the CPS, not DSDT*—and (2) request verification documentation. You report this information on the FAA Access to CPS Online website **no more than 60 days** following your first request to the student for documentation of identity. If there is a change in a result you have already submitted, you can submit the new code using the above process and must make that change **within 30 days** of becoming aware that a change occurred.

### ***Verification for confined or incarcerated students***

The Consolidated Appropriations Act, 2021 added section 484(t) to the Higher Education Act of 1965, as amended (HEA) to formally establish Pell Grant eligibility for confined or incarcerated students, if they are enrolled in a prison education program as defined under the HEA. The Department is currently in the process of establishing regulations to implement the statutory requirements, which will be effective July 1, 2023.

For the 2023-24 award year, a confined or incarcerated student as indicated through the new incarcerated applicant flag will only be required to verify their identity and statement of educational purpose if selected for Verification Tracking Group V4 or V5. In addition, institutions are not required to verify a confined or incarcerated student selected under Verification Tracking Flag V1. See [GEN-22-09](#) for additional information on verification requirements for confined or incarcerated students.

There are times when DSDT doesn't need to verify a student's application. DSDT is, however, still required to resolve conflicting information.

You don't have to verify FAFSA information of a student in the following situations:

- **Death of the student.** You don't have to continue verification if you made an interim disbursement and the student died before verification was completed. You cannot make any additional disbursements, except for FWS funds already earned, to any of the student's beneficiaries. You cannot originate or disburse his or her Direct Subsidized Loan or consider any interim disbursement you made of Pell or FSEOG funds or provisional FWS employment to be an overpayment.
- **Not an aid recipient.** The student won't receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.
- **The applicant is eligible to receive only unsubsidized student financial assistance.** However, students selected for V4 or V5 verification should complete it in accord with the answer to DOC-Q18 on the [verification Q and A page](#).
- **Applicant verified by another school.** The student completed verification for the current award year at another school before transferring. His or her FAFSA data must be the same as it was at the previous school, and you must get a letter from that school stating that it verified the student's application and providing the transaction number of the pertinent valid ISIR.
- **Post enrollment.** The student was selected for verification **after** ceasing to be enrolled at your school, he or she does not intend to reenroll for the award year, and no further (including late) disbursements will be made.

Unless DSDT has reason to believe it is inaccurate, DSDT doesn't have to verify the reported FAFSA information of the **parents of a dependent student** if any of the following apply (including in cases where there is only one parent):

- Both parents are mentally incapacitated.
- Both parents or the custodial parent has died.
- They are residing in a country other than the United States and can't be contacted by normal means.
- They can't be located because the student does not have and cannot get their contact information.

Unless you have reason to believe it is inaccurate, DSDT doesn't have to verify the reported FAFSA information of the **spouse of an independent student** if any of the following apply:

- The spouse has died.
- The spouse is mentally incapacitated.
- The spouse is residing in a country other than the United States and can't be contacted by normal means.
- The spouse can't be located because the student does not have and cannot get his or her contact information.

### **Verification following disasters**

The Secretary will not enforce the verification requirements during the award year for applicants whose records were lost or destroyed because of a disaster if the school has tried to preserve and reconstruct any records. The school must document when it does not perform verification for this reason and use status code "S" when reporting the disbursement of Pell Grants to affected students. Also, the requirement for dependent students to submit a statement signed by a parent regarding household size and number in college is waived if the parents cannot provide the signature due to the disaster. The school must note why no parent was able to provide the statement.

### **HEROES Act modifications**

Provides for the modification and waiving of some statutory and regulatory provisions related to students who receive financial aid and who are on active duty during a war or other military operation or who reside or are

employed in a declared disaster area. These adjustments apply to return of funds and signature requirements for verification and application, among other things. The most recent update to the HEROES Act authorized its provisions through September 30, 2017. See pages 59311–59318 of the Federal Register dated September 27, 2012, for the details on the act and a list of the eligible students.

### **Death of the student**

You don't have to continue verification if you made an interim disbursement and the student died before verification was completed. You cannot make any additional disbursements, except for FWS funds already earned, to any of the student's beneficiaries. You cannot originate or disburse his Direct Subsidized Loan or consider any interim disbursement you made of Pell, Perkins, or FSEOG funds or provisional FWS employment to be an overpayment.

### **Not an aid recipient**

The student won't receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.

The applicant is eligible to receive only unsubsidized student financial assistance.

Applicant verified by another school- The student completed verification for the current award year at another school before transferring. Her FAFSA data must be the same as it was at the previous school, and you must get a letter from that school stating that it verified her application and providing the transaction number of the pertinent valid ISIR.

### **Post enrollment**

The student was selected for verification after ceasing to be enrolled at your school and all (including late) disbursements were made.

### **Verification exclusions 34 CFR 668.54(b)**

- Both parents are mentally incapacitated.
- Both parents and the custodial parent has died.
- They are residing in a country other than the United States and can't be contacted by normal means.
- They can't be located because the student does not have and cannot get their contact information.
- Unless you have reason to believe it is inaccurate, you don't have to verify the reported FAFSA information of the spouse of an independent student if any of the following apply:
  - The spouse has died.
  - He is mentally incapacitated.
  - He is residing in a country other than the United States and can't be contacted by normal means.
  - He can't be located because the student does not have and cannot get his contact information.

### **Verification Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Notify the student that they have been selected for verification via email and/or phone call.
- Provide required documentation to satisfy the requirement.
- Set a deadline for student to submit necessary documents clarify conflicting information. The deadline is to have documents in well in advance to receive an award letter prior to the start date. If they don't have an award letter prior to start date, they will be moved to the next round of enrollment.
- Correct information as needed.
- Notify the student that of the results of the verification, if, the applicant's EFC changes and results in a change in Title IV totals via email and/or phone call.