



## **2018-2019 VERIFICATION POLICIES**

### **Verification:**

Verification is a process to confirm the information you provided on the Free Application for Federal Student Aid (FAFSA).

### **Applications Selected for Verification:**

CASC verifies all applications that are selected for verification by the federal government. In addition, students who submit conflicting or incomplete information may be selected for verification by a CASC Financial Aid Counselor. Students who are selected for verification will be asked to provide supporting documentation of income, household size, number in college, untaxed income and benefits, etc. to verify the data provided on the Free Application for Federal Student Aid (FAFSA). You should not submit tax return transcripts or other verification documents unless it is requested by the Financial Aid Office. Students requesting that unusual circumstances be considered (professional judgment) must complete verification, if selected, before any type of professional judgment will be considered.

### **Items to be Verified/Acceptable Documentation:**

The CASC Financial Aid Office requires appropriate documentation based on the guidelines published in the federal government's Application and Verification Guide. Students who are selected for verification will be placed in one of the following groups. The group determines which FAFSA information must be verified for the student.

### **Types of Verification:**

- **V1 Standard Verification Group:** Students in this group must verify the following:
  - 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
  - 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

- V2 Verification Group: Not in use for 2018-2019.
- V3 Verification Group: Not in use for 2018-2019.
- V4 Custom Verification Group: Students in this group must verify the following:
  - high school completion status
  - identity/statement of educational purpose
- V5 Aggregate Verification Group: Students in this group must verify the following:
  - high school completion status
  - identity/statement of educational purpose
  - items in the V1 Standard Verification Group.
- V6 Verification Group: Not in use for 2018-2019.
- V School Selected Verification Group: Students in this group must verify the following:
  - 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
    - ✓ 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
    - ✓ any other conflicting information requested by the school

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

- **IRS Data Retrieval Tool:**
  - Available at <https://fafsa.ed.gov/>. Eligible parents and students are encouraged to use this tool to transfer tax data from the IRS to the FAFSA.
  - It's the fastest, easiest, and most secure method of meeting verification requirements.
  - Available within two to three weeks of electronically filing a return.
  - Available within six to eight weeks of mailing a paper return.
  - Beginning with the 2018-2019 award year, the actual values of the imported data will not be viewable by students and parents. This is to enhance the security and privacy and to prevent the misuse of sensitive tax-related data.
  - As a result of the IRS data being masked, students and parents will not be able to change it.

- 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 [www.irs.gov](http://www.irs.gov) 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 [www.irs.gov](http://www.irs.gov) 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 [www.irs.gov](http://www.irs.gov).
  - 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.
- **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/Statement of Educational Purpose Verification Worksheet
    - ✓ V4 and V5 Verification Categories

#### **Additional Required Documents:**

- All students whether they are selected for verification or not must submit a signed Satisfactory Academic Progress Policy form and either a H.S. Diploma or Transcript with graduation date or GED
- If a student’s FAFSA shows there is no income earned from work or income received, they will be required to submit an IRS Letter of Non-filing and an Income Verification Worksheet.
- If an Income Verification Worksheet is submitted with no income/benefits received, a Statement of Support form is required.
- 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 Comment Codes listed on the FAFSA or to clear up any issues or discrepancies.
- The verification process must be complete for a selected student before exercising professional judgment (PJ) to adjust any values that are used to calculate the EFC.

### **Reporting Results for Groups V4 and V5:**

- Beginning with 2014–2015, CASC must report the verification results of identity and high school completion 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
  - 4-verification attempted, issues found with HS completion
  - 5-no response from applicant or unable to locate
  - 6-verification attempted, issues found with both identity and HS completion

### **Process:**

- CASC receives FAFSA data from the federal government at least once a week.
- The Financial Aid Office emails a Welcome Letter to all applicants confirming their FAFSA has been received.
- The Welcome Letter states the verification category (if applicable) and the documents required.
- The federal government has customized the verification process and different documents will be required for different verification categories.
- Documents may be downloaded from the CASC financial aid webpage.
- Applicants should submit all requested documents as soon as possible after receiving the document request letter to avoid delays in processing their aid. 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. 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 FAFSA data. The Financial Aid Counselor will submit corrections on the student's behalf by sending them electronically to the U. S. Department of Education system. 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 forward the file to the Financial Aid Director for packaging.
- The Financial Aid Director or Assistant Director will package the student's aid and an award letter will be emailed to the student's CASC email.
- Should a student's EFC change and/or their Title IV aid amounts change, a new award letter will be emailed to notify the student.

## **Professional Judgement for Special Cases:**

An 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 EFC. For students who were selected for verification (by the Financial Aid Office or the Department), 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 he was not already selected for verification.

- **Dependency Override** – requires financial aid form, *Dependency Override Request*, and supporting documents
  - 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
  - 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 purposes
    - Student demonstrates total self-sufficiency
- **Parental Data Override** – 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
  - Students who qualify for this override will be able to receive unsubsidized loans only.
- **Special Condition** – requires financial aid form, *Special Condition Application*, and supporting documents
  - 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 2017 or 2018 Federal Tax Return Transcript with W2's
    - Change in Marital Status
      - Must attach a copy of the Marriage License and Student's/Spouse's 2016 Federal Tax Return Transcript and W2s
    - Separation or Divorce
      - Must attach a copy of legal documentation and Student's/Spouse's 2016 Federal Tax Return Transcript and W2s
    - Death of a Spouse
      - Must attach a copy of the obituary or death certificate

## **Deadlines:**

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

- The federal government's processor must receive a FAFSA by June 30, 2019 for the 2018-2019 award year.
- 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, 2019 for the 2018-2019 award year.

- CASC must receive a valid FAFSA (ISIR) with an official EFC calculated from the government's processor by the student's last date of enrollment for the 2018-2019 award year or by September 21, 2019, whichever is earlier.
- CASC must receive 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 for the 2018-2019 award year or September 21, 2019, whichever is earlier.
- CASC may not make a late disbursement later than 180 days after the student was no longer enrolled.
- CASC must receive a valid FAFSA (ISIR) no later than 180 days after the student was no longer enrolled, but not later than September 21, 2019.
- 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 Form, Entrance Counseling, Master Promissory Note, AND signed Award Letter** by the Friday before Finals week before the loan can be originated.
- 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.
  - Failure to complete verification or if the verification does not justify aid already disbursed, the student is responsible for repaying all aid he/she is 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 being responsible for paying his/her tuition, fees, and other institutional charges out of pocket.
- The semester and/or academic year ending with the student having an outstanding balance with the college. This would prevent the student from enrolling in future semesters, receiving grades, obtaining a transcript, etc.

#### **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.