

# 2016-17 Verification

Joseph Massman, Training Officer  
U.S. Department of Education  
2016 SDASFAA Conference

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## Agenda

- Background
- 2016-17 Verification Changes Overview
- 2016-17 Verification Tracking Groups & Documentation
- Verification Reminders
- Resources



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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

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### Verification – History

- For the 2012-2013 award year
  - Retained the long-standing five items and added SNAP and child support paid, if reported on the ISIR
- 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

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### Verification – History

- 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
- For the 2015-2016 award year
  - No changes to verification items and tracking groups

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**2016-17 Verification Changes Overview**


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**2016-17 Verification – Overview**

- Same data elements as for 2015-2016 award year
- Some modifications and clarifications to acceptable documentation
- In limited circumstances, an applicant's Verification Tracking Group could change
- Resources
  - GEN-15-11
  - Federal Register Notice – June 26, 2015
  - Electronic Announcement – November 18, 2016
    - Suggested Text


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**2016-17 Verification**

Verification Tracking Group changes:

- Verification Tracking Group V3 (Child Support Paid) has been removed
  - Applicants placed in V1, V4, V5, and V6 must still verify child support paid if reported on ISIR




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### 2016-17 Verification

Verification Tracking Group changes:

- Applicants may be moved from previously assigned Groups V1, V4, and V6 to Verification Tracking Group V5
  - Applicant is only required to verify the additional items in V5 that were not previously verified
  - If the applicant is moved to Verification Tracking Group V5, no additional disbursements of any Title IV aid may be made until verification is satisfactorily completed

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### 2016-17 Verification

Verification Tracking Group changes:

- Applicants moved to Verification Tracking Group V5
  - If student was previously verified and Title IV aid had been disbursed prior to receiving an ISIR with updated code V5, and the applicant does not complete verification, the applicant is liable for the full amount of TIV aid disbursed for 2016-2017
  - The school is not liable
    - *Exception: if an R2T4 is required for the student, school would return funds as per normal*

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### 2016-17 Verification

*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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### 2016-17 Verification

#### 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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### Verification Policy Updates

- Tax filers and Nontax filers—if a copy of the *tax return was not retained and cannot be located by the IRS* must submit the following:
  - Copy of all relevant W-2s
  - Signed statement that individual did not retain a copy of his or her tax account information, **and**
  - Documentation from the IRS that indicates that the individual's tax account information cannot be located
- *Child support paid*
  - Removed a separation agreement or divorce decree from acceptable documentation

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### Verification Policy Updates

#### 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
- An institution may not accept as alternative documentation an applicant's self-certification, nor a DD Form 214 Certificate

#### Identity/Statement of Educational Purpose

- The valid government-issued photo identification used to verify an applicant's identity must not have expired

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**Verification Policy Updates**

Victims of IRS tax-related identity theft must submit

- Statement signed and dated by tax filer indicating they were victims of IRS tax-related identity theft and the IRS has been made aware of the tax-related identity theft; **and**
- A Tax Return DataBase View (TRDBV) transcript obtained from the IRS
  - Tax filers who cannot obtain a TRDBV transcript may instead submit another official IRS transcript or equivalent document provided by the IRS if it includes all of the income and tax information required to be verified

**Guidance applies to 15/16 and subsequent years**

- Posted in 6/26/15 Federal Register Notice

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**Verification Policy Updates**

*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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**Verification Tracking Groups:  
Data Elements &  
Documentation**



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### Verification Selection Groups

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

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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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**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 for each source of employment income received for tax year 2015

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**V1 – Tax Non-Filers**

- If a school questions a claim that the tax filer is not required to file, must require applicant to submit a "Verification of Nonfiling Letter:"
  - Applicant must complete Form 4506-T and check box 7
  - "Verification of Nonfiling Letter" for 2015 tax year generally not issued until after June 15, 2016

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**V1– All Applicants**

- Number in Household & Number in College

**Documentation:**

- Household size – signed statement (name, age, relationship)**
  - Not required for 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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**V1– All Applicants**

- SNAP Benefits (If reported on ISIR)

**Documentation**

- Statement signed by applicant affirming SNAP benefits received by someone in household during 2014 and/or 2015
- If school has concerns with accuracy of information, the institution must obtain documentation from the agency that issued the SNAP benefits

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**V1– All Applicants**

- Child Support Paid (If reported on ISIR)

**Documentation**

- Statement signed by applicant/parent certifying:
  - Amount of child support paid
  - Name of the person who paid the child support
  - Name of the person to whom child support was paid, and
  - Names and ages of the children for whom child support was paid

If the school has reason to believe that the information provided in the signed statement is inaccurate, the applicant must provide the institution with supporting documentation, such as checks, signed statements etc.

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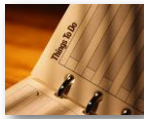
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**V4—Custom**

- High School Completion Status
- Identity/Statement of Educational Purpose
- SNAP Benefits (if reported on ISIR)
- Child Support Paid (if reported on ISIR)



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**High School Completion Status**

- High school completion status

**Documentation**

- High school diploma; or
- Final official high school transcript showing date diploma awarded, or
- Secondary leaving certificate (for students who completed secondary education in a foreign country and are unable to get a copy of high school diploma/transcript)

*Note: If prior to student 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**

- Recognized equivalent of a HS diploma

**Documentation**

- Copy of 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 has met all the criteria to be admitted to a 2-year degree program or higher

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**High School Completion Status**

- Test transcripts of State-authorized examinations

**Documentation**

- Official 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 a 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

- Homeschooled

**Documentation**

- Credential, 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 credential for homeschool provided for under state law

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### Identity/Statement of Educational Purpose

- Students that appear in person

**Documentation**

- Present to an institutionally-authorized individual
  - A valid (unexpired) government-issued photo identification, **and**
  - A signed statement of educational purpose *provided by ED, text 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

- Student unable to appear in person

**Documentation**

- Must provide the institution:
  - A copy of a valid (unexpired) government-issued photo identification AND
  - An original, notarized statement of educational purpose signed by the applicant (**cannot** be faxed or scanned)
  - Maintain a copy in the file
  - After examining the *original* Statement of Educational Purpose for accuracy and completeness, the institution may convert it into 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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**V6 – Household Resources**

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

**AND**

- Other untaxed income from 2016-17 FAFSA:
  - Payments to tax-deferred pension and savings
  - Child support received
  - Housing, food and other living allowance paid to members of the military, clergy and others
  - Veterans non-education benefits
  - Other untaxed income
  - Money received or paid on the applicant's behalf

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**V6 – Household Resources**

- Other Untaxed Income Documentation

**Documentation:**

- Signed statement listing sources and amounts of income for tax year 2015, and
- Copy of IRS W-2s for sources of employment income received for tax year 2015, where applicable

- If school determines amounts provided do not appear to provide sufficient support for family members reported, the applicant (and parent/spouse) must:
  - Provide additional signed statement listing other resources used to support family (may include items not required to be reported on FAFSA or other verification forms)
  - Explain how financially supported during 2015 calendar year

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### V6—Household Resources

- Schools should use reasonable judgment when evaluating the validity of the income information provided by students and parents who are placed in Verification Tracking Group V6
- “Reasonable” may differ among institutions
- Schools may choose to accept a signed low-income statement, an income-to-expenses comparison, or other documentation as determined by the institution

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### Verification Reminders



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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 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

*When above documentation reviewed, verification is considered complete (disbursements are valid)*

- Program Integrity Q&A Website (DOC-Q16)
- School may request transcript/IRS DRT when taxes are filed; must then re-verify income information

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### FAA Access – Identity Verification Results

- In 2014-15 an Identity Verification Results reporting function was added to FAA Access
- Schools report the identity verification results for students who have been selected for verification under V4 or V5

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### FAA Access – Identity Verification 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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### FAA Access – Identity Verification Results

- Dropdown options are
  1. Verification **completed** in person, **no issues** found
  2. Verification completed **remotely**, 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



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### Verification & PJ

- For applicants **selected** for verification (by ED or school), *must complete verification before PJ adjustments made [HEA section 479A(a)]*
- But...all PJ adjustments do **NOT** require verification
  - *Does school require?*
- **Must** mark ISIR as PJ!
  - An ISIR with PJ **coded correctly** will **not** be subject to ED's verification selection

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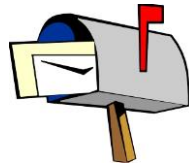
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### Transcript Requests – 2016-2017

- Online **Get Transcript by Mail**
- Automated phone tool (1-800-908-9946)
- Paper Form 4506-T or 4506T-EZ generate a paper transcript



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**Resources**

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**Federal Student Aid Handbook**

- Application and Verification Guide – Chapter 4

**Federal Register**

- June 26, 2015 (2016-17 verification items & documentation)

**Dear Colleague Letter**

- GEN 15-11 Published on June 29, 2015

**Federal Regulations**

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

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**Resources**

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**2016-17 Tax Return Transcript Matix**

- Electronic Announcement released March 23, 2016
- <http://www.ifap.ed.gov/eannouncements/032316FAFSAVerification20162017IRSTaxReturnTranscriptMatrix.html>

**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

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**Review**

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- Background
- 2016-17 Verification Changes Overview
- 2016-17 Verification Tracking Groups & Documentation
- Verification Reminders
- Resources



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**Department of Education Contacts**

**Research and Customer Care Center**  
 800.433.7327  
[fsa.customer.support@ed.gov](mailto:fsa.customer.support@ed.gov)



**Reach FSA**  
 855.FSA.4FAA -- 1 number to reach 10 contact centers!

eZ-Audit	Campus Based Call Center
COD	School Eligibility Service Group
CPS/SAIG	Foreign Schools Participation Division
NSLDS	Research and Customer Care Center
G5	Nelnet Total & Permanent Disability Team

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**Training Feedback**

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

- Go to <https://www.surveymonkey.com/s/Massman>
- Evaluation form is specific to Joseph Massman
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to [JoAnn.Borel@ed.gov](mailto:JoAnn.Borel@ed.gov); 409-579-3776

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**Questions?**

Contact me with follow-up questions about this session:  
 Joseph Massman, Federal Training Officer  
[Joseph.Massman@ed.gov](mailto:Joseph.Massman@ed.gov); 303-844-0432



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