

# The University of Findlay Office of Financial Aid Policy & Procedure Verification

## **Background**

Federal regulations (34 CFR Part 668 Subpart E) provide for the Department of Education (ED) and institutions to collect documentation for review from applicants for student financial assistance. Federal regulations require an applicant to submit required documentation if either ED or the institution determine the documentation is necessary to complete the verification process. This process of document review is referred to as verification.

Any student that wishes to receive an initial disbursement or, if selected after the first disbursement has been processed, a subsequent disbursement of federal student assistance must submit all necessary documentation to complete verification. The normal processing time for this process will be two weeks during non-peak periods. This timeframe can be longer than normal during our peak periods (June, July, August).

## **Selection Criteria**

The University of Findlay will attempt to verify (1) all students selected for verification by the Department of Education that do not meet an approved exclusion criteria and (2) any applicant's information that is believed to be inaccurate or has conflicting information.

## **Conflicting & Inaccurate Information**

The University of Findlay will collect information required to obtain a valid expected family contribution in order to accurately award students institutional, federal, and state financial aid. Information is gathered through communication (e.g. phone and email) with family, data from the FAFSA application submitted by the applicant, as well as communication with other University of Findlay departments. Conflicting information exists when new information from these sources contradicts or calls into question the accuracy of data previously reported to the Office of Financial Aid. All members of The Office of Financial are responsible for noting conflicts of information and seeking resolution. This may require a follow-up conversation with the family or the submission of additional documentation.

## **Verification Exclusions**

The University of Findlay will waive verification for any student selected for verification in the following cases:

- i. Dependent students - the student has died, the student is not using federal assistance for a reason other than not completing verification, or if the student only qualifies for non-need based aid.
- ii. Independent students - The University of Findlay will waive verification for independent students that have died, are not using federal assistance for a reason other than not completing verification, or if the student only qualifies for non-need based aid.

Dependent students seeking to have parent information excluded from verification or independent students seeking to have spousal, information excluded from verification must go through The University of Findlay special circumstance review process.

### **Verification of Transfer Students**

In general, undergraduate transfer students regardless of dependency status will not have verification requirements waived due to completing the process at another institution. The Director of Financial Aid reserves the right to override this policy on a case-by-case basis.

### **Verification and Higher Education Relief Opportunities for Students (HEROES)**

The Higher Education Relief Opportunities for Students (HEROES) Act provides certain exceptions to the normal verification process. The University of Findlay will make the required exceptions to eligible applicants. Eligible applicants under the HEROES act include:

- Activity duty service members during a war, military operation, or national emergency; qualifying National Guard during a war, military operation, or national emergency;
- Residing or employed in an area declared a disaster by any federal, state, or local official in connection with a national emergency;
- Those who have suffered direct economic hardship as a result of war, military operation, or national emergency.

### **Notification**

Students are notified they have been selected for verification in several ways. ED will notify students on the Student Aid Report by placing an asterisk to the right of the expected family contribution. Students will also receive notification from The University of Findlay describing the process of verification and the necessary elements that need to be verified through email. First-time students will receive the notification using the email reported on the FAFSA application until the academic year begins. Returning students and first-time freshman that are selected for verification after the start of the fall term in a given academic year will receive the notification using the UF email account.

### **Date Elements and Acceptable Documentation**

The Office of Financial Aid is responsible for collection of appropriate documentation to verify self-reported values on the FAFSA. The Department of Education is responsible for determining the data elements reviewed during verification process. ED updates both the data elements and acceptable documentation annually in the Federal Register. For the 2017-2018 academic year ED will no longer be reviewing SNAP, child support, or other untaxed income elements. As a result of this students are placed into one of three distinct verification groups (V1, V4, V5). The following is a list of data elements and forms of acceptable documentation for the 2016-2017 award year are as follows:

#### *Household Size (V1, V5)*

The University of Findlay utilizes a verification worksheet to verify a student's household size were necessary. Although the number of people in someone's household size can be vary on specific scenarios, in general, the following are considered part of the household:

- Dependent students include the parent or parents listed on the FAFSA, children under the age of 24, and anyone for whom they provide more than 50% support from July 1, 2016 through June 30, 2017.
- Independent students list themselves, their spouse (if applicable), children under the age of 24, and anyone for whom they provide more than 50% support from July 1, 2016 through June 30, 2017.

#### *Number Enrolled in College (V1, V5)*

The University of Findlay utilizes the verification worksheet to verify the number of people in a student's household attending a Title-IV eligible, post-secondary institution. In general, the following are included in those attending college:

- Dependent students include themselves, siblings, and other dependents of the parents listed on the FAFSA as long as they are attending a post-secondary institution at-least halftime. Parents are excluded.
- Independent students include themselves, their spouse (if applicable), and other dependents in the household as long as they are attending a post-secondary institution at-least halftime.

#### *Non-tax filers: Income Earned from Work (V1, V5)*

The University of Findlay is mandated to collect a signed verification worksheet and the IRS 'Verification of Nonfiling Letter' to complete the financial aid verification process for non-tax filers. Earned income information must be reported accurately on the verification worksheet. Applicants that received a W-2 will be required to submit this documentation. If an applicant did not receive a W-2 and the information does not create conflicting information the signed verification worksheet will be acceptable documentation.

#### *Tax Filers: Adjusted Gross Income, income taxes paid, education credits, untaxed distributions from IRAs, untaxed distributions from pensions, tax-exempt interest (V1, V5)*

The University of Findlay utilizes unaltered data transferred from the IRS using the IRS Data Retrieval Tool or a tax return transcript from the appropriate tax year. ED determines the base tax year that students must supply on the FAFSA application, which is 2015 for the 2016-2017 award year.

- Dependent students would submit the IRS Data Retrieval Tool or tax return transcript for themselves and their parent/parents listed on the FAFSA application that were tax filers in the base tax year.
- Independent students would submit the IRS Data Retrieval Tool or tax return transcript for themselves and their spouse, if applicable.

#### *Supplemental Nutrition Assistance Program*

The Department of Education is no longer requesting that SNAP benefits be reviewed as part of the verification. Conflicting information will still be resolved by requesting additional documentation on a case-by-case basis.

#### *Child Support Paid*

The Department of Education is no longer requesting that child support be reviewed as part of the verification. Conflicting information will still be resolved by requesting additional documentation on a case-by-case basis.

#### *High School Completion Status (V4, V5)*

The University of Findlay will utilize final transcripts or GED information submitted to the Admissions' Office to verify completion status.

#### *Identity and Statement of Purpose (V4, V5)*

The University of Findlay will utilize either a hand delivered copy of the student's driver license or a notarized statement form to verify the student's identity and intention to complete an eligible degree or certificate program.

### **Interim Disbursements**

In general, the Office of Financial Aid does not perform interim disbursements. The Director of Financial Aid reserves the right to provide interim disbursements on a case-by-case basis. Financial aid counselors refer students in which circumstances may warrant interim disbursement to the Director directly. The Director will review all documentation and determine if the student is eligible for an interim disbursement. If an interim disbursement is allowed the student will be individual counseled with the Director to ensure the student is aware of the results of verification as well as an overpayments. If an overpayment results from the verification process, the student's financial aid is revised in the following order: first in the current term, then in subsequent awards during the same award year.

### **Database Matches**

An applicant must meet basic eligibility criteria to receive federal financial aid. The Department of Education assists institutions by providing information that is not readily available at the institutional-level, e.g. whether a student has completed selective service. This information is provided to institutions through a variety of database matches, reject codes, and serious notations called 'c-codes'.

When an ISIR is received into CX contact codes are loaded into the system. Jenzabar CX utilizes a compliance tool to ensure that any type of matching issues are resolved before allowing financial aid to process.

### **Post-screening**

The Office of Financial Aid is required to review all subsequent transactions for a student, even if verification was completed. The ISIR Change Report is used to identify these types of changes and whether additional steps are needed.

The Office of Financial Aid will first determine if EFC has changed, any of the "C" flags have changed, or if there are new comments or NSLDS information. If the EFC has not changed or if the EFC has changed but does not have a corresponding adjustment to the dollar amount, no additional changes will be made. If the EFC does change the Financial Aid counselor will investigate the reason for the change, they will requires additional documentation if necessary, and any conflicting information will be resolved prior to any future disbursements.

Students are notified of any updates via their UF email account.

### **Timeframe for submitting documents**

Students who would like financial aid in place prior to term start should have all verification documents submitted Aug. 1. Pell recipients must submit verification documentation 120 days after the last date of attendance or the Sept. 23, 2017 for the 16-17 award year or by Sept. 15, 2018 for the 17-18 award year. For all other federal aid programs, including Federal Direct Loans, The University of Findlay must have a verification documents and a valid FAFSA result ten days prior to the term end.

### **Timeframe for processing documents**

Students who would like financial aid in place prior to term start should have all verification documents submitted Aug. 1.

### **Consequences of failing to submit documents**

If The University of Findlay has not received all verification documents and a valid EFC by the dates described above federal aid will not be awarded. The student will be responsible for paying any outstanding fees to the Business Office and may be subject to the Business Office 'hold' policy.

**Referral Process** – Federal regulations require institutions to report any suspected or potential fraud to the Office of the Inspector General. Fraudulent activity includes false claims of independent student status, false claims of citizenship, use of false identities, forgery of signatures of certifications, false statements of income, and other forms of misrepresentation with the intention of obtaining funds for which one is not otherwise eligible to receive.

Any activity which qualifies as suspected or potential fraud will be reported to the Office of the Inspector General by phone at (800) 647-8733, via email at [oig.hotline@ed.gov](mailto:oig.hotline@ed.gov). Additional contact information can be obtained at [www.ed.gov/misused](http://www.ed.gov/misused).