1. **Summary:** This policy establishes responsibilities, criteria, and procedures for the verification of student information submitted through the Free Application for Federal Student Aid (FAFSA).

2. **Rationale:** This policy is necessary to ensure that the college disburses federal student aid in accordance with all requirements of the Department of Education.

3. **Entities Affected:** students

4. **Definitions:** Definitions are included in the body of the policy.

5. **Policy:**

   **Overview**
   
   To apply for federal financial aid, students submit a Free Application for Federal Student Aid (FAFSA) to the Central Processing System (CPS). FAFSA applications with inconsistent information may be selected for verification. Verification is a quality-control method used by the U.S. Department of Education to check the accuracy of information submitted on the FAFSA. All schools that disburse federal Title IV funds are required to participate in the verification process. For a comprehensive listing of regulations, it is encouraged that one view the Code of Federal Regulations Title 34 – Part 668 – Subpart E, the current award year Application and Verification Guide, and Sec. 479A of the Higher Education Act.

   In accordance with the provisions of Subpart E, the College has established a policy to ensure consistency and accuracy in the verification of an applicant’s FAFSA information. This policy includes:

   - The time within which an applicant must provide any documentation requested by the College
   - The consequences of an applicant’s failure to provide the requested documentation within the specified time
   - The method by which the College notifies an applicant of the results of its verification
   - The procedures the College will follow
   - The procedures the College will require an applicant to follow to correct FAFSA information
   - Conditions under which a student may be eligible for exclusion from the verification process
   - The procedures the College will follow for making referrals to the Office of Inspector General

   **Institutional Responsibility:** The College must require an applicant whose FAFSA information is selected for verification to submit defined documentation to verify specified data elements of the FAFSA, unless the applicant qualifies for a federal exclusion. (See Exclusions from Verification.)
Applicant Responsibility: If the College requests documents or information from an applicant under Subpart E, the applicant must provide the specified documents or information within an established timeframe.

7.1.1 Selection of Applicants to be Verified

Standard Selection – Verification selection is indicated by the verification flag being set to a value of “Y” on the student’s Institutional Student Information Record (ISIR). The corresponding tracking group (V1, V4, or V5) is listed as well.

Customized Selection: The U.S. Department of Education’s long-range goal for verification is a customized selection approach based on the data provided by each FAFSA applicant. When fully implemented, verification data will be customized by each applicant’s data. Transition to a customized verification process is expected to continue over multiple award years.

Update or Correction Selection: An aid applicant should be aware that an update or correction to his or her FAFSA may trigger the CPS to select the application or additional data elements for verification. In this case, the College must require the applicant to submit any additional documentation needed to complete the verification process.

Institutional Selection: Criswell College has the authority and responsibility to select an application for verification if there is reason to believe that an applicant’s FAFSA information is inaccurate and/or contains conflicting information. The student is required to submit documentation to verify the accuracy of the FAFSA data to resolve conflicting information or verify specific data elements.

Exclusions from Verification: Federal regulations stipulate that the College need not verify an applicant’s FAFSA information if:

1. the applicant dies;
2. the applicant does not receive assistance under Title IV HEA programs for reasons other than failure to verify FAFSA information;
3. the applicant is eligible to receive only unsubsidized student financial assistance; or
4. the applicant who transfers to the institution had previously completed verification at the institution from which he or she transferred, and applies for assistance based on the same FAFSA information used at the previous institution, if the current institution obtains a letter from the previous institution:
   a. stating that it has verified the applicant's information; and
   b. providing the transaction number of the applicable valid ISIR.

Further, unless the College has reason to believe that the information reported by a dependent student is incorrect, it need not verify the applicant’s parents’ FAFSA information if:

1. both parents die, or the only parent on the FAFSA dies;
2. the parents are residing in a country other than the United States and cannot be contacted by normal means of communication;
3. the parents cannot be located because their contact information is unknown and cannot be obtained by the applicant; or
4. both of the applicant’s parents are mentally incapacitated.
Lastly, unless the institution has reason to believe that the information reported by an independent student is incorrect, it need not verify the applicant's spouse’s information if:

1. the spouse is deceased;
2. the spouse is mentally incapacitated;
3. the spouse is residing in a country other than the United States and cannot be contacted by normal means of communication; or
4. the spouse cannot be located because his or her contact information is unknown and cannot be obtained by the applicant.

**Criswell College policy regarding federal exclusions:** Verification requirements will be waived for the federal exclusions listed above provided the College receives supporting documentation pertaining to the applicable exclusion by the College’s published verification deadlines.

**Notification**
A student whose FAFSA is selected for verification will be notified of his or her selected status as follows:

1. CPS will notify the student on his or her Student Aid Report (SAR)
2. Criswell will send an email notification to students that includes:
   a. Documents needed
   b. A link to the “forms” section of the college’s website
   c. Deadline along with consequences of failure to meet the deadline

**Deadlines and Failure to Submit Documentation**
Criswell College has established a priority deadline of April 15th for financial aid applicants to complete the 2020-2021 FAFSA. If a student misses this deadline, he or she is encouraged to complete the FAFSA as soon as possible but no later than June 30th.

A student whose FAFSA is selected for verification must submit documentation to the Financial Aid Office within 14 calendar days of notification. Failure to meet this requirement results in delayed financial aid awarding. The Financial Aid Department does not begin processing until all necessary documentation is submitted.

If the student does not provide the verification documentation by the deadline or the College does not receive a valid processed FAFSA by the deadline:

- Aid could be canceled for the award year (or term if the student is enrolling in one term only).
- Students will not receive a financial aid award or any disbursement until verification is complete.
- Students will lose eligibility for institutional aid

If the student provides the documentation after the deadline, Criswell College will reevaluate the student’s eligibility for aid on a case-by-case basis.

**7.1.2 Acceptable Documentation**
The documentation required for verification varies according to the specific FAFSA information being verified. A student selected for verification will need to submit the following acceptable documentation to the College to complete the verification process:

1. Dependent or Independent Worksheet for the appropriate selection group
2. 2018 Income Tax Data (via the FAFSA Data Retrieval tool or Tax Return Transcript from the IRS)
3. Income from work documents (W-2s or 1099s)
4. Other documents as requested

If a student is unable to submit any of the required documents, he/she should contact the Financial Aid Office to discuss possible alternative acceptable documentation. It is recommended an applicant and/or applicant’s parent(s) use the IRS Data Retrieval Tool (DRT) embedded in the FAFSA to import his or her tax return information. A “02” code listed on the ISIR next to student and/or parent “IRS Flag” will satisfy these requirements.

**IRS Data Retrieval Tool (DRT):** The IRS DRT is the fastest, easiest and most secure method of meeting verification requirements. To verify tax data, the U.S. Department of Education and the College encourage students and parents to use the IRS DRT to import data from their tax return directly to the FAFSA, either at the initial FAFSA filing or through the FAFSA correction process. For the retrieved data to be acceptable documentation of tax data, it is necessary that neither the student nor the parents change the data after it is transferred from the IRS.

For assistance with the IRS DRT process, the instructions are attached to the student Criswell email when the tax transcript has been requested for verification.

**Requesting a Tax Return Transcript and a Wage and Income Transcript**
A student or parent may request an IRS Tax Return Transcript and the Wage and Income Transcript from the IRS, free of charge, in one of the following ways.

2. By mail after submitting an online request at [http://www.irs.gov/Individuals/GetTranscript](http://www.irs.gov/Individuals/GetTranscript); or after
3. Calling the IRS at 1-800-908-9946.

The IRS DRT is NOT available for the following conditions (all apply to both students and parents):
   a) the person did not indicate on the FAFSA that the tax return has been completed;
   b) the applicant or applicant’s parents had a change in marital status after the end of the 2018 IRS taxyear on December 31, 2018;
   c) the first three digits of the SSN are 666;
   d) the person has been a victim of identity theft (See Victim of Identity Theft below.);
   e) the tax return was amended (See Filing an Amended Return below.);
   f) the person filed a tax filing extension with the IRS (See Tax Filing Extensions below.);
   g) the person filed a Puerto Rican or foreign tax return (See Foreign Tax Filers below.);
   h) the person is married and filed the tax return either as head of household or married filing separately;
   i) in all instances, when the dependent student’s legal parents are unmarried and living together;
   j) neither married parent entered a valid SSN on the FAFSA;
k) a non-married parent, or both married parents, entered all zeroes for the SSN on FAFSA; or the person
l) filed the tax return as married and has now separated, divorced, married someone else, or been
widowed.

<table>
<thead>
<tr>
<th>FAFSA Information</th>
<th>Acceptable Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Size*</td>
<td>A signed Criswell College Verification Worksheet (2020-2021)</td>
</tr>
<tr>
<td>Number in College</td>
<td>A signed Criswell College Verification Worksheet (2020-2021)</td>
</tr>
<tr>
<td>AGI &amp; U.S. Tax Paid</td>
<td>IRS DRT*** or 2018 IRS Tax Return Transcript****</td>
</tr>
<tr>
<td>Untaxed Income (Tax Return Data)</td>
<td>IRS DRT*** or 2018 IRS Tax Return Transcript****</td>
</tr>
<tr>
<td>Non-Filer Work Income</td>
<td>2018 IRS W-2 Forms, Assigned Criswell College Verification</td>
</tr>
<tr>
<td>High School Completion</td>
<td>High School Diploma or transcript; GED certificate or transcript; homeschooled credential or transcript; or academic transcript showing two-year program completion</td>
</tr>
<tr>
<td>Identity/Statement of</td>
<td>Original government-issued photo identification (ID), such as a passport or a driver’s license, and original 2020-2021 Identity and Statement of Educational Purpose</td>
</tr>
<tr>
<td>Education Purpose</td>
<td></td>
</tr>
<tr>
<td>Other Information</td>
<td>Other documentation as specified by the CPS or the College</td>
</tr>
</tbody>
</table>

**IRSA Tax Return Transcript**: If a student or parent cannot or will not use the IRS DRT, he or she must provide the Tax Return Transcript and Wage & Income Transcript from the IRS for tax year 2018.

**Special Tax Filing Circumstances**

**Identity Theft**
If the applicant and/or applicant’s parent(s) are victims of identity theft and therefore unable to use the IRS DRT or request an IRS Tax Return Transcript, they can submit a Tax Return DataBase View (TRDBV) along with a signed statement indicating they are victims of tax-related identity theft. The TRDBV can be requested by calling the IRS’s Identity Protection Specialized Unit (IPSU) at 1-800-908-4490.

**Filing an Amended Return**
A student or parent who files an amended return cannot use the IRS DRT process. Instead he/she may submit to the Financial Aid Office:

- Copy of the original 2018 IRS Tax Return Transcript
- Signed copy of the amended 2018 tax return (1040X) that was filed and stamped by the IRS or done with a tax preparer and has the tax preparer’s PTIN on the form
- Tax Account Transcript
- Wage and Income Transcript

**Extensions**
A student or parent who is granted a tax filing extension is required to turn in the following:

- A copy of IRS Form 4868
- Copies of all W-2 forms or the equivalents
- If self-employed, a signed statement with the amount of AGI and U.S. income taxes paid
If applicable, a copy of the IRS’s approval of the extension if an additional extension was requested.

Relationship Status with Extenuating Circumstances

If an applicant or applicant’s parent(s) is/are married, but separate tax returns were filed, an IRS Tax Transcript will be needed for both individuals.

If an applicant or applicant’s parent(s) was/were married during the tax year and filed a joint return, but are now separated or divorced, an IRS Tax Transcript of the original joint return will need to be provided along with signed W-2’s for the applicant or parent the applicant is using on the FAFSA (in the case of a dependent student) for that same tax year. At that point, the Financial Aid Office may separate the income and determine tax liability under professional judgment (additional documentation may be needed). See section 7.1.8 for more information on this process.

In the case of a dependent student, if the parent signing the FAFSA selects “Unmarried and both parents living together” as the marital status, IRS Tax Transcripts will need to be provided for both parents.

Foreign Tax Filers

In the case of a dependent student, if the parent(s) is considered to be a nonresident alien (not a U.S. citizen or permanent resident), the income earned may still be subject to tax in the same manner as a U.S. citizen or permanent resident. In these cases, a Form 1040NR or 1040NR-EZ will serve as acceptable documentation.

If the applicant and/or applicant’s parent(s) file taxes in a U.S. territory or commonwealth, he or she must submit a transcript of his or her tax return if it is available for free from the taxing authority. U.S. territories include Guam, American Samoa, and the U.S. Virgin Islands. Commonwealths include Puerto Rico and the Northern Mariana Islands. A signed copy of the applicable tax return will be acceptable, but only if the applicant is unable to obtain a free copy of the transcript from the relevant taxing authority.

Nontax filers in the Freely Associated States, a U.S. territory or commonwealth, or a foreign country must submit a copy of their Wage and Tax statement for each source of employment income for the required tax year and a signed statement identifying all income and taxes for that same year. Please see the preceding paragraph for a listing of U.S. territories and commonwealths. Freely Associated States include the Republic of the Marshall Islands, the Republic of Palau, and the Federated States of Micronesia.

Non-Tax Filers

If the applicant and/or applicant’s parent(s) did not file and were not required to file a tax return, W-2’s will need to be provided for jobs held in the tax year to be verified, and the applicant will need to complete the appropriate section on the Verification Worksheet Independent Student or Verification Worksheet Dependent Student, depending on the applicant’s dependency status.

If W-2’s cannot be obtained from the employer(s), the applicant and/or applicant’s parent(s) may submit a signed statement listing the amount of income earned from work, source of that income, and why the W-2 is not available. This applies to all positions held during the tax year for which a W-2 cannot be provided. A section for this information is included on the Verification Worksheet Independent Student and Verification Worksheet Dependent Student. Additionally, the applicant or applicant’s parent(s) may need to complete the Certification That IRS Tax Forms Were Not Filed found in the Financial Aid Office if there is a conflict between the income.
earned form work listed on the ISIR and the amount listed on the applicable Verification Worksheet. If the Financial Aid Office has reason to believe the applicant or applicant’s parent(s) claim that they are not required to file a tax return is inaccurate, a “Verification of Nonfiling Letter” must be submitted. This can be obtained online through the IRS website at www.irs.gov or by completing a Form 4506-T and checking box 7. The “Verification of Nonfiling Letter” is generally not available until after June 15th of each year.

If no income was earned in the tax year to be verified, an applicant and/or applicant’s parent(s) can indicate this on the Verification Worksheet Independent Student or Verification Worksheet Dependent Student, depending on the applicant’s dependency status. Once again, the applicant or applicant’s parent(s) may need to complete the Certification That IRS Tax Forms Were Not Filed form found in the Financial Aid Office if further clarification is needed. Additionally, if the Financial Aid Office has reason to believe the applicant or applicant’s parent(s) claim to not have to file is inaccurate, a “Verification of Nonfiling Letter” will be required to be submitted.

**Missing Tax Return**

For tax filers and nontax filers, if a copy of the tax return was not retained and cannot be located by the IRS, the following must be submitted –

- Copy of all relevant W-2s;
- If self-employed, a signed statement certifying the amount of AGI and taxes paid;
- Signed statement that the applicant or applicant’s parent(s) did not retain a copy of her or his tax account information; and
- Documentation from the IRS that indicates the individual’s tax account information for the required year cannot be located.

**7.1.3 Data Elements to be Verified**

For each award year, the Secretary of Education publishes a notice in the Federal Register announcing the FAFSA information that an institution is required to verify. The notice also specifies what documentation is acceptable for verifying FAFSA information.

The individual verification items that an applicant must verify are based upon the Verification Tracking Group to which the applicant is assigned as listed in the chart below:

<table>
<thead>
<tr>
<th>Tracking Flag</th>
<th>Verification Tracking Group Name</th>
<th>FAFSA Information Required to be Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td>V1</td>
<td>Standard Verification Group (Non-Tax Filers)</td>
<td>Income Earned from Work Number of Household Members Number in College</td>
</tr>
</tbody>
</table>
### Data Elements

Financial data elements are derived from the 2018 Tax Return Transcript Information as listed below:

- Adjusted Gross Income
- U.S. Income Tax Paid
- Education Credits
- IRA Deductions & Payments
- Tax Exempt Interest Income
- Untaxed Portions of IRA Distributions
- Untaxed Portion of Pensions

Household and identity data are derived from the verification worksheet and supporting documentation.

#### Household Size

For 2020-2021, the number of household members includes anyone who is receiving more than half of their support from the student, spouse, or the parent listed on the FAFSA from July 1, 2020 to June 30, 2021. This includes unborn children.

#### Number in College

The number in college represents all household members enrolled at least half-time in a Title IV eligible college. Parents of a dependent student are excluded from this number. Name, age, relationship to student, and college attended are required to be part of the documentation along with an indication of at least half-time enrollment for each student listed.

#### High School Completion

- A copy of a high school diploma.
- A copy of a final, official high school transcript that shows the date when the diploma was awarded.
- A copy of a General Educational Development (GED) certificate or GED transcript that indicates the student passed the exam.
• Certification of a passing score on a test that the student’s state authorizes and recognizes as the equivalent of a high school diploma. This includes tests similar to the GED, such as the High School Equivalency Test or the Test Assessing Secondary Completion. Test transcripts are acceptable documentation if they indicate that the final score is a passing score or that the student’s state considers the test results to meet its high school equivalency requirements.

• A copy of the “secondary school leaving certificate” or similar document from the proper government agency for students who completed secondary school in a foreign country. If your college doesn’t have the expertise to evaluate foreign secondary school credentials or chooses not to do so, there are evaluation services available.

• An academic transcript that indicates the student successfully completed at least a two-year program that is acceptable for full credit toward a bachelor’s degree at any participating school.

• A copy of a secondary school completion credential for homeschool (other than a high school diploma or its recognized equivalent) if state law requires homeschooled students to obtain that credential.

• A transcript or the equivalent, signed by the parent or guardian of a homeschooled student, which lists the secondary school courses the student completed and documents the successful completion of a secondary school education in a homeschool setting.

• For a student who has not completed high school and is seeking enrollment in a program that leads to at least an associate degree or its equivalent, documentation from the high school that he excelled academically and from your school that he meets your written policy for admitting such students. This should be a rare occurrence.

• For students in an “eligible career pathway program,” documentation that they passed an approved ATB test or completed at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by your school.

Identity/Statement of Educational Purpose
Applicants must appear in person to complete the Identity and Statement of Educational Purpose form in the presence of a Financial Aid staff member with a valid, unexpired, government-issued photo ID, such as a driver’s license or passport, to identify they are the individuals applying for federal financial assistance. The Financial Aid staff member must make a copy of the ID.

The Statement of Educational Purpose portion of the form certifies who they are and that the federal student aid they may receive will only be used for educational purposes.

If an applicant is unable to appear in person, she or he will need to sign the form in front of a notary of the public and have the notary complete the section titled, “Notary’s Certificate of Acknowledgement.” The document must then be mailed into the Financial Aid Office along with a copy of the same ID presented to the notary. Faxed or e-mailed forms are not accepted. Identity Verification Results are reported through FAA Access.

7.1.4 Conflicting & Inaccurate Information
If the Financial Aid Office has any conflicting information on an application, or believes an applicant’s application information is in error, it must resolve the discrepancies prior to disbursing any federal aid. The requirement to resolve conflicting data is separate and distinct from verification and supersedes any verification policies. If conflicting data is discovered after federal aid has disbursed, it must be corrected and awards updated. The student is required to repay any amount of aid received in excess of her or his eligibility.
In accordance with 34 CFR 668.16(g), if after conducting a review of an application the Financial Aid Office discovers credible information indicating an applicant for federal financial aid may have engaged in fraud or other criminal misconduct in connection with her or his application, Criswell College must refer the applicant to the Office of the Inspector General (OIG) of the Department of Education for investigation.

The type of information that an institution must refer is that which is relevant to the eligibility for federal financial aid program assistance, or amount of said assistance. This may include, but is not limited to:

- False claims of student dependency status;
- False claims of citizenship;
- Use of false identities;
- Forgery of signatures or certifications;
- False statements of income; and
- Any credible information indicating that any employee of Criswell College that works in a capacity involving Title IV administration may have engaged in fraud, misrepresentation, or any other illegal conduct.

To submit a referral, visit https://oighotline.ed.gov/Hotline/Instruction.aspx or contact by phone at 1-800-647-8733.

7.1.5 Student Notification of Verification Changes
If the verification process produces an EFC change, the financial aid office will notify the student via phone or email to explain the changes in EFC. Students are not awarded Title IV aid until the verification process is completed to remedy a large volume of award changes. The verification process is completed when the award letter is generated and emailed to the student. The award letter is also uploaded to the student’s portal for immediate review.

The College is able to submit most updates to FAFSA information, but, on occasion, it may be necessary for the student to submit changes directly to the CPS. One of several examples would be the update of biographical information. In such cases, the College will notify the student by phone, mail, or email as to which data items must be corrected. The verification process is completed when the corrected ISIR is received and reviewed to ensure all information is accurate. If no further corrections are needed, the student is emailed an award letter with notification that the awards are available for review via the student portal.

Applicant Verifications with No Corrections Necessary
Some applicants selected for verification have no errors on their application and need no further processing prior to the awarding process. These applicants are awarded upon the completion of the verification review checklist. Notification is completed by emailing the award letter to the student and uploading it to their portal.

7.1.6 Interim Disbursements
Interim disbursements are allowed either prior to or after verification but prior to receiving the corrected ISIR. If Criswell College has no reason to question the accuracy of FAFSA information after the verification process is completed, the college’s policy allows the FAA to:

- Make one disbursement of Pell funds for the applicant’s first payment period; and
- Originate – but not disburse – a Direct Subsidized Loan.
In the event an interim disbursement made from Pell funds results in an overpayment, Criswell College is fully responsible. If this overpayment cannot be eliminated by reducing subsequent disbursements or having the student return the funds, Criswell College must use its own funds to reimburse the appropriate program the earlier of 60 days after the student’s last day of attendance or last day of the award year.

If an interim disbursement is made after completing verification, but the Financial Aid Office fails to receive the corrected ISIR, Criswell College must use its own funds to reimburse the appropriate program.

7.1.7 Professional Judgments
Professional Judgment is the discretionary action available to a financial aid administrator to address unusual circumstances that affect a student’s ability to pay for education expenses and change data elements to reflect more accurately the student’s ability to pay. Financial aid administrators may make adjustments on a case-by-case basis. The Director of Financial Aid reviews professional judgments. Professional Judgment documentation is available via the college’s website along with the Professional Judgment Policy. The forms must be completed and accompanied by appropriate documentation at the request of the Director of Financial Aid. The PROFESSIONAL JUDGMENT process takes up to six weeks depending on the student’s/parents’ situation and the documents needed to complete the professional judgment. The school is required to complete verification on selected applicants before processing the professional judgment request from the student.

7.1.8 Definitions of Common Terms
Central Processing System (CPS): The primary business function of the CPS is student application processing and eligibility determination for federal student financial assistance for postsecondary education.

Expected Family Contribution (EFC): A measure of how much the student and his or her family can be expected to contribute to the cost of the student’s education for the award year based on the federal need analysis formula. Note: The University determines a student’s eligibility for need-based federal aid based on the student’s EFC.

Institutional Expected Family Contribution (IM EFC): A measure of how much the student and his or her family can be expected to contribute to the cost of the student’s education for the award year based on the institutional need analysis formula. Note: The University determines a student’s eligibility for need-based institutional aid based on a student’s IM EFC.

Institutional Student Information Record (ISIR): One of two output documents created by the CPS after processing a student’s FAFSA. The ISIR is made available electronically to the institutions listed on the student’s FAFSA and his or her state agency.

Federal subsidized student financial assistance programs: Title IV, HEA programs for which eligibility is determined on the basis of an applicant’s EFC. These programs include the Federal Pell Grant and Direct Subsidized Loan program.

Federal unsubsidized student financial assistance programs: Title IV, HEA programs for which eligibility is not based on an applicant’s EFC. For students attending Criswell College, these programs include the Direct Unsubsidized Loan and Direct PLUS/Graduate PLUS Loan programs.
Student Aid Report (SAR): One of two output documents created by the CPS after processing a student’s FAFSA. The SAR is made available electronically to the student.

6. Procedure:
   a. Implementation: The Financial Aid Director is responsible for maintaining and implementing procedures necessary for compliance with this policy.
   b. Responsibility for Compliance: Vice President of Student Affairs
   c. Notification: This policy will be posted on the college’s website and network drive and will be published in its entirety or in summary in the college’s Catalog.
   d. Policy Review: This policy will be regularly reviewed according to the college’s policy review procedure.