

Verification & UEH

NCASFAA Fall Conference

Verification & Unusual Enrollment History

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U.S. Department of Education

From: / / Interval: monthly weekly daily
To: / /

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Verification

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2015-16 Verification

- Same verification items and Verification Tracking Groups to be verified as 2014-2015
 - Kept groups V1, V3, V4, V5 and V6
- Applicant will remain in *original* 2015–2016 Verification Tracking Group for the entire 2015–2016 award year record
 - Federal Register published June 25, 2014
 - GEN-14-11 published June 30, 2014
 - EA November 24, 2014 – Suggested Text

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Verification & UEH

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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V1- Non- Tax Filers

- Income earned from work

Documentation:
 1. Signed statement certifying –
 a) Individual has not filed and not required to file 2014 tax return;
 b) Sources of income earned from work and amounts of income from each source for tax year 2014;
 2. Copy of IRS Form W-2 for each source of employment income received for tax year 2014;

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V1- All Applicants

- # in Household & # in College

Documentation:
 1. *Household size* – signed statement (name, age, relationship)
 a. Not required if:
 - 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
 2. *# in College* – signed statement (name of household member attending at least half-time and eligible institution name)
 a. Not required if reported number is one (student)

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V1– All Applicants

- SNAP Benefits (If reported on ISIR)
- Child Support Paid (If reported on ISIR)

SNAP Documentation:
 1. Statement signed by applicant/parent affirming SNAP benefits received by someone in household during 2013 and/or 2014

2. If school has concerns with accuracy of information, the institution must obtain documentation from the agency that issued the SNAP benefits

Child Support Paid Documentation:
 Explained under V3 slide

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V3– Child Support Paid

Documentation:

(1) Statement signed by the applicant/parent certifying—


- (a) Amount of child support paid;
- (b) Name of the person who paid the child support;
- (c) Name of the person to whom child support was paid; and
- (d) Names and ages of the children for whom child support was paid

(2) If the institution 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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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

Documentation:

- High school diploma; or
- Final official high school transcript showing date diploma awarded; or
- “Secondary school leaving certificate” for students who completed secondary education in foreign country and unable to get copy of high school diploma/transcript
- **Note:** If, prior to 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

Documentation: Recognized equivalent of a HS diploma

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

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High School Completion Status

- 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 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

- Documentation: Homeschooled
- 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 completion credential for home school provided for under State law

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Identity/Statement of Educational Purpose

- Documentation: students that appear in person
- Present to an institutionally authorized individual
 - A valid government-issued photo identification; and
 - Cannot use military IDs
 - Does NOT have to be Real ID Act compliant (DOC-Q26)
 - A signed statement of educational purpose
 - Provided by ED, 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

Documentation: student unable to appear in person

- Must provide the institution—
 - A copy of a valid government-issued photo identification
 - Cannot use military IDs
 - Does NOT have to be Real ID Act compliant (DOC-Q26)
- AND
- An *original*, notarized statement of educational purpose signed by the applicant
 - Cannot be faxed or scanned
 - After examining *original* Statement of Educational Purpose, institution may convert it to an electronic record

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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 2015-2016 FAFSA:
 - Payments to tax-deferred pension and savings
 - Child support received
 - Housing, food and other living allowances paid to members of the military, clergy and others
 - Veterans noneducation benefits
 - Other untaxed income
 - Money received or paid on the applicant's behalf

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V6—Household Resources

Other Untaxed Income Documentation:

1. Signed statement listing –
- Sources and amounts of income for tax year 2014
2. Copy of IRS W2s for sources of employment income received for tax year 2014 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 2014 calendar year

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V4/V5 Tracking Results – 2015-2016

- The V4 and V5 tracking process in FAA Access that began in the 2014-15 processing year WILL CONTINUE for 2015-16.
- Schools need to select the proper award year for which they are providing results
 - 2014-15; 2015-16, etc.

<https://faaaccess.ed.gov>

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V4/V5 Tracking Results – 2015-2016

Use the Identity Verification Results section on the FAA Access home page

FAA Access to CPS Online

Need Help?

Welcome to the FAA Main Menu

Select an option from the following menu. It will be necessary to provide the TSM for your Destination Point and your Federal School Code.

- Student Status**
 - View a Student's Student Aid Report (SAR) information, including the Expected Family Contribution (EFC), HELD/S information, and Loan Comments. Compare new SAR information to the same student using SAR Comments. Submit a signature log for an application in a signature host (Make using the Standard FAA Signature feature)
 - Application Entry
 - Enter a student's FAFSA/Renewal Application or Correction data and submit it to the CPS for processing.
 - FAFSA/Renewal Application
 - Correction
 - Renewal & Renew Application
 - Renewal a partially completed and saved FAFSA/Renewal Application or Correction and submit it to the CPS for processing.
 - FAFSA/Renewal Application
 - Identity Verification Results
 - Select the results of SAR/SI and High School Diploma/GED verification efforts.
 - Get Financial
 - Request SAR data.
 - Get Renewal Data
 - Print & Upload Data
 - Attach FAFSA information reported on the SAR. Data is used to determine what impact changes to student-reported information had on EFC and Pell eligibility.
 - Print & Upload SAR Data
 - Calculate and manage the return of Title IV funds. Data is collected, and the Return of Title IV Funds is calculated according to ED's Student Assistance General Provision.
 - High School FAFSA Completion of 100 Participants (Only) Request and view High School FAFSA Completion data. Access to this new feature is limited to participating state agencies, local educational agencies and secondary schools enrolled in the High School FAFSA Completion Pilot initiative.

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V4/V5 Tracking Results – 2015-2016

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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V4/V5 Tracking Results – 2015-2016

The FAA will enter SSN, Name ID (first two letters of the last name), and Verification Results from a dropdown menu on this page

Click "Add SSNs" and enter additional ones

manual entry option

FAA Access to CPS Online – Identity Verification Results

Need Help?

Enter Results

Star for your Destination Point: 1000000
Federal School Code: 011002
School Year: 2015-2016

Enter the SSN, Name ID, and select the Identity Verification Results.

SSN	Name ID	Identity Verification Results
		Select
		Select
		Select
		Select
		Select

ADD SSNs

PREVIOUS SUBMIT

NEED HELP? RETURN TO FAA MENU EXIT

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V4/V5 Tracking Results – 2015-2016

FAA Access to CPS Online – Identity Verification Results

NEED HELP?

Load Results File

TGF for your Destination Point: TQ99999
Federal School Code: 001002
School Year: 2013-2014

Enter the location of the file you want to load:

FAAs are able to create and upload a flat file

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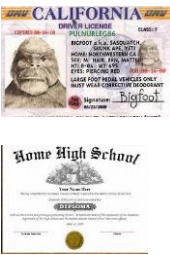
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V4/V5 Tracking Results – 2015-2016

• Dropdown options will be:

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



If issues found with BOTH identity and HS completion, school will indicate issues found with identity (#3)

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V4/V5 Tracking Results – 2015-2016

FAA Access to CPS Online – Identity Verification Results

NEED HELP?

Confirmation

TGF for your Destination Point: TQ99999
Federal School Code: 001002
School Year: 2013-2014

FAAs will get a confirmation page with the results submitted and can print the page for their records

Your Identity Verification Results have been submitted for the following record(s):

111-11-1111	BB	Verification completed in person, no issues found
111-11-2222	CC	Verification attempted, issues found with identity
111-11-3333	DD	No response from applicant or unable to locate

Select **PRINT THIS PAGE** to print this page for your records.

If a student's results change after they have been submitted, the school would simply resubmit the student's information

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Verification & UEH

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
 - Suggested Text – Coming soon!

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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 Tracking Group V5
 - Applicant is only required to verify the additional items in V5 that were not previously verified
 - if verification not completed for previously assigned Verification Tracking Group (V1, V4, and V6) prior to student moving to V5, institution is only required to verify the FAFSA information in Verification Tracking Group V5
 - If applicant is moved to Verification Tracking Group V5, no additional disbursements of any Title IV aid may be made until verification is completed

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Verification & UEH

2016-17 Verification

Verification Tracking Group changes:

- Applicants moved to Verification Tracking Group V5
 - If Title IV aid had been disbursed prior to receiving an ISIR with the new V5, and the applicant does not complete verification, the applicant is liable for the full amount of TIV aid disbursed for 2016-2017
 - The institution is not liable

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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), and 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:
 - 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 & UEH

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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October 2, 2015 Electronic Announcement

- Alternative documentation allowed when tax filer RECENTLY requested but unable to obtain an IRS Tax Return Transcript using the IRS *paper or on-line* request process
- No alternative documents for telephone requests
- Exception not permitted for –
 - transcripts unable to be obtained simply because the IRS has not had time to process the data due to a recent filing
 - saying the "Get Transcript Online" tool is not available

For 2015-2016 award year



2015-2016 – Transcripts Unavailable

- Alternative documentation includes:
 - Signed copy of relevant 2014 IRS tax return
AND
 - *Statement from tax filer, on or attached to the return, certifying same data submitted to the IRS*
AND
 - Communication from IRS stating request unsuccessful
 - Letter from IRS (signed and dated by tax filer); or
 - Screen shot print (signed and dated by tax filer)
- Completed and signed IRS Form 4506 T-EZ or 4506-T listing institution as third party – only send to IRS if doubt accuracy



Unusual Enrollment History



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Unusual Enrollment History (UEH)

- Beginning with the 2013-14 award year, the Department added an Unusual Enrollment History (UEH) flag that indicates a student has an unusual enrollment history based on the receipt of Federal Pell Grant (Pell Grant) funds
- We added the flag to address possible fraud and abuse in the Title IV student aid programs
- We are concerned about an enrollment pattern in which a student attends an institution
 - long enough to receive Title IV credit balance funds,
 - leaves without completing the enrollment period,
 - enrolls at another institution, and
 - repeats the pattern of remaining just long enough to collect another Title IV credit balance without having earned any academic credit

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UEH – Overview


- Some students who have an unusual enrollment history have legitimate reasons for their enrollment at multiple institutions
- However, such an enrollment history requires a review to determine whether there are valid reasons for the unusual enrollment history
- Resolution of a UEH flag is separate and distinct from verification



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UEH Authority

- Authority**
- 484(a)(4)(A) of the Higher Education Act of 1965
 - requires student to sign a *Statement of Educational Purpose*
 - by signing *Statement of Educational Purpose* (FAFSA), student certified would use title IV aid only to meet educational costs



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UEH - 13/14 and 14/15

- Prior to 15/16, schools only evaluated Pell Grant disbursement information for the past three award years
- FAFSA filers were assigned a UEH Flag of 'N,' '2' or '3', based on the number of Pell Grant disbursements that a filer received compared to the number of schools that the individual attended

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UEH – 2015-2016

2015-2016 UEH Flag has expanded to consider–

- An applicant's prior receipt of a Federal Direct Loan (in addition to Pell Grant funds)
- Does not include Direct Consolidation Loans or parent PLUS Loans
- Does not substantially increase the number of applicants flagged
- The prior four award years (instead of three years)
- For 2015-2016, UEH Flag evaluation includes the 2011-2012, 2012-2013, 2013-2014, and 2014-2015 award years

A school may self-select a student for UEH (not selected by ED) if suspect enrollment problems

- Self-selected students treated as if have UEH 3 flag

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UEH – Resolution

- UEH Flag value is 'N': No action is necessary
- UEH Flag value is '2': Must review student's enrollment and financial aid records to determine if, during the **4 award year review period** (11/12, 12/13, 13-14, 14/15), student received a **Pell Grant and/or Direct Loans during ANY award year at institution performing the review**
- If so, no additional action is required *unless* reason to believe student is one who remains enrolled just long enough to collect student aid funds. In this case, must follow guidance provided for a UEH Flag of '3'.
- If not, must follow guidance provided for UEH Flag of '3'

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UEH – Flag #3 Resolution

- **UEH Flag value is '3'**: The institution must review the student's academic records to determine if the student received academic credit at the institutions the student attended during the **four award year** period (2011-12, 2012-13, 2013-14 and 2014-15)
- Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received **Pell Grant and/or Direct Loan funding** over the past four award years (2011-12, 2012-13, 2013-14 and 2014-15)

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UEH – Flag #3 Resolution

- Based upon academic transcripts it may already possess, or by asking the student to provide academic transcripts or grade reports (official transcripts NOT required), the institution:
 - Must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant and/or Direct Loan funds
 - *Academic credit is considered to have been earned if the academic records show that the student completed any credit-hours or clock-hours*

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UEH – Flag #3 Resolution

- **Academic Credit Earned**: If determined student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required *unless* institution has other reasons to believe student enrolls just to receive credit balances
- If it is determined that academic credit was NOT earned at one or more of the previously attended institutions OR the school had reasons to believe student just enrolls for TIV funds, the institution must follow the "Academic Credit Not Earned" guidance

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UEH – Flag #3 Resolution

- *Academic Credit NOT Earned:* If student did not earn academic credit at a previously attended institution, including current school, must obtain documentation from student explaining why failed to earn academic credit
- Must determine whether the documentation supports
 - (1) the reasons given by the student for the student’s failure to earn academic credit; and
 - (2) student did not enroll only to receive credit balance funds
- Institutional determinations are final and not appealable to the Department, and reasons for the decision must be documented and maintained for possible review

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UEH – Flag #3 Resolution

Justification for UEH:

- Personal reasons
 - Illness, a family emergency, a change in where the student is living, and military obligations
- Academic reasons
 - The student might explain that the first enrollment was at an institution that presented unexpected academic challenges, or
 - The academic program did not meet the student’s needs, as determined by the student
- The institution should, to the extent possible, obtain third party documentation to support the student’s claim

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UEH – Eligibility after Resolution

- *Approval of Continued Eligibility*
 - If school approves student’s continued eligibility, may:
 - Require student to establish academic plan, like (SAP),
 - Counsel student about the impact of the student’s attendance pattern on future Pell and DL eligibility
- *Denial of Continued Eligibility*
 - If a student did not earn academic credit and does not provide acceptable explanation and documentation, school must deny student any additional title IV
 - Student must be provided an opportunity to question and appeal decision, similar to SAP appeals

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UEH – Eligibility after Resolution

- Regaining Aid Eligibility
 - If aid is denied, you must give the student information on how to regain eligibility
 - *Successful completion of academic credit is the basis for a student's request for renewal of eligibility*
 - can include meeting the requirements of an academic plan
 - Pell Grant eligibility and campus-based aid begin with the payment period in which the student meets the eligibility requirements
 - Direct Loan eligibility is retroactive to the beginning of the enrollment period

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UEH – FAQ

- Circumstances when a student's 2013-14 ISIR included a UEH Flag of '2' or '3', but the UEH Flag value is 'N' on the student's 2014-15 ISIR
 - If you have previously resolved the 2013-14 UEH issue, there is no need for any further review
 - If you have not satisfactorily resolved the 2013-14 UEH issue, you should, but are not required to, hold disbursement of Title IV aid for 2014-15 until you resolve the earlier UEH issue
 - In doing so, you must review not only the student's academic record for the 2010-11, 2011-12, and 2012-13 award years noted in DCL GEN-13-09, but also the more recent 2013-14 award year

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UEH – FAQ

- Circumstances where you suspect that a student for whom the Department did not assign a UEH Flag of '2' or '3' on his ISIR may be applying for and receiving Title IV aid for purposes other than to provide financial support for postsecondary education
 - In such instances, you may choose to hold disbursement of Title IV aid until you review the academic history of the student
 - In doing so, you must document the reasons why you took this action, as well as the specific steps the institution took to resolve the institutional selection for UEH review

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Verification & UEH

Contacts

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 - MS, AL, FL, GA, NC, SC
 - Main Number: 404-974-9303
 - Cassandra Weems (IIS) 404-974-9305
- *Atlanta* Training Officers
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 - David Bartnicki – 404-974-9312

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Training Feedback

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

- Go to <http://s.zoomerang.com/s/DavidBartnicki>
 - Evaluation form is specific to David Bartnicki
- 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

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Questions?




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