



**Policy & Procedure No. 2.016
Nunez Community College**

Title: Financial Aid Verification

Effective Date: 10.20.2018

Last Revision Date: 04.16.2018

Cancellation:

Department/Office: Student Affairs

Financial Aid Verification Policy

PURPOSE

The purpose of the Financial Aid Verification Policy is to ensure the accuracy of student reported data on financial aid applications as federally mandated by the Department of Education.

SCOPE

This policy applies to financial aid and applicants.

POLICY

All LCTCS Colleges will follow normalized policies and procedures for verification, the federally mandated process schools must follow to check the accuracy of information reported on the Free Application for Federal Student Aid (FAFSA) as authorized by [LCTCS Policy 2.016](#).

Verification is the process of confirming the accuracy of student reported data on financial aid applications. The US Department of Education selection criteria requires that at least thirty percent of the financial aid population be verified. The school has the authority, and may be required, to verify additional students. Students may be selected for verification if there is a discrepancy or a condition, which is unusual and warrants investigation.

The Application and Verification Guide published by the US DOE serves as a reference for verification requirements.



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Verification Process

The verification process is completed by the college Financial Aid Office. The college will verify those students who have been selected by the US DOE for verification; however, students may be asked to provide additional information if further investigation is needed to resolve a discrepancy or conflicting information.

It is the policy of the college that awards are not disbursed until verification is complete. The policy does not allow for interim disbursements. Students must complete the verification process before aid is disbursed.

Upon receipt of the electronic ISIR, a document tracking letter is automatically generated in Banner for any student who is selected for verification according to the federal selection criteria. These required items inform the student of additional information, which is required to complete the financial aid verification process (verification form, student and parent (where applicable), tax transcripts, verification of citizenship, selective service, etc.) Students are also notified that they have been selected for verification upon receipt of the electronic Student Aid Report (SAR).

When all requested items have been received, the Financial Aid Office will pull the student's ISIR, and mark all required documents as "received and reviewed." As reviewed, corrections may be made for any change in data and additional corrections may be sent for transmission via FAAccess or Banner.

When the corrected ISIR is received, final review of the file takes place and an award is made if the student is eligible.

Documentation submitted must be legible, appropriate and have the student's ID number for identification purposes. If the student submits a document that is not legible, it will be returned and appropriate documentation will be requested.

Selected verification students who fail to submit verification documents will not be disbursed financial aid.

There are also some instances where a student will be considered a special circumstance; which requires professional judgment by the College. Special circumstances consist of dependency override, loss of income, and other extenuating circumstances.



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Conflicting Information

A college must resolve conflicting information about a student before the student can receive federal student aid; which includes any discrepancy in the information that a college has regarding a student that affects his or her eligibility for federal student aid. A college must resolve discrepancies for all students, not just those selected for verification. Resolution includes determining what information is correct and documenting the school's findings in the student's file.

Such a system must include a review of:

- All student aid applications, need analysis documents, multiple reporting records, potential over awards from COD, statements of educational purpose, statements of registration status, and eligibility notification documents presented by or on behalf of each applicant.
- The Student Aid Report/ISIR for a student. Even if a school has already verified the information on a student's SAR/ISIR, it must review all information on subsequent SARs/ISIRs.
- Any documents, including copies of federal tax return and tax account transcripts, that are normally collected by the school to verify information received from the student or other sources.
- Any other information submitted or normally available to the school regarding a student's citizenship, previous educational experience, or Social Security number or other factors relating to the student's eligibility for FSA funds.

Other examples include:

- A College's admissions or registrar's office must provide the aid office with any information it has that might affect a student's eligibility, such as the student's enrollment in an ineligible program or in summer classes immediately preceding a fall term of enrollment.
- A school's business office must inform the aid office whenever it receives information about a student receiving an outside scholarship.

There is a distinction between how long you need to be alert for conflicting information and how long you have to actually resolve a conflict. Even if the processing year has ended, you must continue to resolve unless:

- all aid for the period of enrollment has been disbursed,
- at the time of disbursement there was no conflicting information, and
- the student is no longer enrolled at the school (and is not intending to reenroll)

A College may not ignore a document in your files unless a student is no longer enrolled. If you have conflicting information in your files, you must resolve it as expeditiously as possible. If you become aware of conflicting information for a student who is no longer enrolled and there is aid to be disbursed, you must resolve the conflict before making the late or post withdrawal disbursement.



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If aid that the college was unaware of is received after the end of a period of enrollment for a student who is intending to reenroll, that aid must be treated as estimated financial assistance for either the period of enrollment just completed or for the subsequent period of enrollment.

If any office at the College has information that might affect a student's eligibility for FSA funds, it must provide that information to the College's Financial Aid Office, where procedures must be in place to ensure that any conflicting information is resolved and documented before the student receives an (or any additional) FSA funds.

Training

The Financial Aid Office will obtain annual training sessions on changes to verification regulations and procedures defined by the Department of Education. In addition, the college has resources from the Executive Director, Enrollment Support Manager to provide further guidance.

Exclusions

There are times when a student's application doesn't need to be verified. **Except in the case of the student's death, however, none of the exemptions excuse you from the requirement to resolve conflicting information.** The basis of the exclusion should be documented. Other information not excluded must still be verified according to all other requirements. FAFSA information does not have to be verified in the following situations:

- a) Death of the student. Verification does not need to continue if an interim disbursement was made and the student died before verification was completed. Additional disbursements cannot be made, except for FWS funds already earned, to any of the student's beneficiaries. Originations of Direct Subsidized Loans cannot be made and interim disbursements made of Pell, Perkins, or FSEOG funds or provisional FWS employment to be an overpayment are not allowable.
- b) Not an aid recipient. The student won't receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.
- c) The applicant is eligible to receive only unsubsidized student financial assistance.
- d) Applicant verified by another school. Verification was completed for the current award year at another school before transferring. The FAFSA data must be the same as it was at the previous school, and a letter must be obtained from that school stating that it verified the application and provided the transaction number of the pertinent valid ISIR.
- e) Post enrollment. The student was selected for verification **after** ceasing to be enrolled at your school and all (including late) disbursements were made.



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Unless there is a reason to believe it is inaccurate, verification is not required on the reported FAFSA information of the spouse of an independent student if any of the following apply:

- The spouse has died;
- He/She is mentally incapacitated;
- He/She is residing in a county other than the United States and can't be contacted by normal means;
- He/She can't be located because the student does not have and cannot get the contact information

Applicants selected for verification:

- will be placed into a verification tracking group by the DOE;
- will receive by the student's college-issued e-mail account and LoLA account
 - verification selection notice explaining and requesting the documentation required to complete verification;
- will be notified by the college of a priority deadline to submit all verification documentation in advance of the fee payment deadline;
- will **not** receive financial aid disbursements until the verification process is complete;
- will have all necessary FAFSA corrections entered on their behalf by financial aid processing staff upon receipt of verification documentation;
- will, if necessary, have their award decreased—funds will be returned to the appropriate Title IV program, and the college will bill the student for any balance that results; and
- will be reported to the DOE Office of Inspector General if suspected of engaging in fraud (i.e. altering documents, intentional misreporting, etc.) for the purposes of increasing aid eligibility.

Nunez Community College will not verify applicants who are not selected by the DOE unless circumstances and or available information requires that verification be conducted in accordance with Title IV of the Higher Education Act.

Review Process: Provide/edit example table below to document review process and all reviewing entities

| X | Reviewing Council/Entity | Review Date | Effective Date |
|----------|-------------------------------------|--------------------|-----------------------|
| X | Financial Aid Office | 10-16-18 | 10-20-18 |
| X | Business/Bursar Office | 10-16-18 | 10-20-18 |
| X | Vice Chancellor for Student Affairs | 10-16-18 | 10-20-18 |
| X | NCC Compliance Committee | 10-16-18 | 10-20-18 |
| X | Chancellor's Council | 10-19-18 | 10-20-18 |



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Chancellor’s Signature/Approval

SIGNATURE: _____
 Tina M. Tinney, Ed.D.
 Chancellor

DATE: 10/20/2018