



Verification Policy 2019-20

Overview

To apply for federal financial aid, a student submits a Free Application for Federal Student Aid (FAFSA) to the Central Processing System (CPS). Because students sometimes make errors on their application, there is a process for verifying applications and making corrections. The regulations in Subpart E (sections 51 to 61 of Part 668 of the Title 34 of the Code of Federal Regulations) govern the verification by institutions of information submitted by applicants for student financial assistance under the subsidized student financial assistance programs.

In accordance with the provisions of Subpart E, the College has established and uses written policies and procedures for verifying an applicant's FAFSA information. These policies and procedures include—

- (1) The time period within which an applicant must provide any documentation requested by the College;
- (2) The consequences of an applicant's failure to provide the requested documentation within the specified time period;
- (3) The method by which the College notifies an applicant of the results of its verification if, as a result of verification, the applicant's EFC changes and results in a change in the amount of the applicant's assistance under the title IV, HEA programs;
- (4) 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 supporting documentation to verify specified data elements of his/her 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 this Subpart E, the applicant must provide the specified documents or information.

Selection of Applicants

► ***Update or Correction Selection:*** An aid applicant should be aware that an update or correction to his/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:*** The 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 will then be required to submit documentation to clarify the accuracy of the FAFSA data and/or to resolve the conflicting information.

Exclusions

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

- The applicant dies.
- The applicant does not receive assistance under the title IV, HEA programs for reasons other than failure to verify FAFSA information.
- The applicant is eligible to receive only unsubsidized student financial assistance. However, students selected for V4 or V5 verification should complete it in accord with the answer to DOC-Q18 on the verification Q and A page; or
- The applicant was selected for verification after ceasing to be enrolled at the College and all (including late) disbursements were made.
- 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—
 - 1) Stating that it has verified the applicant's information; and
 - 2) 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—

- Both of the parents are mentally incapacitated.
- Both parents (*biological or adoptive*); or the custodial parent has died.
- They are residing in a country other than the United States and cannot be contacted by normal means.
- They can be located because the student does not have and cannot get their contact information.

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—

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

Please Note: Verification requirements will be waived for the federal exclusions listed above provided the college receives supporting documentation pertaining to the applicable exclusion by our published verification deadlines.

Verifiable Items and Supporting Documentation

Verification Tracking Group	Verifiable Items	Documents Needed
V1 Standard Verification Group (Tax Filers)	<ul style="list-style-type: none"> • Adjusted Gross Income • U.S. Income Tax Paid • Untaxed Portions of IRA Distributions • Untaxed Portion of Pensions • IRA Deductions & Payments • Tax Exempt Interest Income • Education Credits • Number of Household Members • Number in College 	✓ 2019-20 Independent (Dependent) Verification Worksheet or 2019-20 College Board Verification Worksheet. ✓ Data Retrieval Tool (DRT); or 2017 IRS Tax Return Transcript
V1 Standard Verification Group (Non- Tax Filers)	<ul style="list-style-type: none"> • Income Earned from Work • Number of Household Members • Number in College 	✓ Copy of 2017 W2's or 2017 Wage and Income Transcript <i>And/or</i> ✓ Confirmation of Non-Filers from the IRS dated on or after October 1, 2017
V4 Custom Verification Group	<ul style="list-style-type: none"> • High School Completion Status • Identity/Statement of Educational Purpose 	High School Diploma or transcript; GED certificate or transcript; homeschooled credential or transcript; or academic transcript showing two-year program completion
V5 Aggregate Verification Group	All items in V1 and V4	All documents as required by both verification tracking groups V1 & V4

****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, at the initial FAFSA filing. For assistance with the IRS DRT process, a student may find useful videos on the YouTube website: https://www.youtube.com/results?search_query=irs+drt

Victims of Identity Theft: When the IRS determines a tax filer has been or likely was a victim of identity theft, it will not allow him/her to use the IRS DRT process or get a tax return transcript until the matter has been resolved, which can take up to a year for complex cases. For a tax filer who is a victim of identity theft, the College will accept for verification:

1. A Tax Return DataBase View (TRDBV) transcript obtained from the IRS by calling the IRS's Identity Protection Specialized Unit (IPSU) toll-free number at 800-908-4490; and
2. A statement signed and dated by the tax filers indicating that they were victims of IRS tax-related identity theft and that the IRS has been made aware of the tax-related identity theft.



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Filing an Amended Return: A student or parent who files an amended may still use the IRS DRT. However, to complete verification you will need a signed copy of the 1040X form that was filed as well as either

- IRS DRT information on the FAFSA with all the information from the original tax return or;
- An IRS tax return transcript (which does not have to be signed) or any other IRS transcript that includes all the income and tax information required to be verified.

Foreign Tax Filers: A student or parent who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, must use the income and tax information (converted to U.S. dollars) from the lines of that form that correspond most closely to the income information reported on a U.S. income tax return to complete the FAFSA. Foreign tax filers cannot use the IRS DRT process and, therefore, must submit signed copies of their 2017 foreign tax returns translated into English with U.S. dollar equivalencies to the Financial Aid Office.

- **Non –Tax Filers:** A student or parent who did not file a 2017 tax return must provide the college with a W-2 form for each source of employment income. Student and Parents (except dependent students) must also provide the college with a “Verification of Non-filing Letter” (confirmation that the tax return has not yet been filed) from the IRS or other relevant tax authority or; a signed statement certifying that the individual attempted to obtain the non- tax filers from the IRS or other tax authorities but was unable to obtain the required documentation.

Deadlines and Failure to Submit Documentation

A student whose FAFSA information has been selected for verification must submit all documentation required for verification to the Financial Aid Office by specific deadlines according to the type of subsidized federal aid received and his/her period of enrollment.

► **For subsidized federal aid programs, excluding the Federal Pell Grant Program:** A student enrolled in the fall 2019 term must submit required verification documentation by November 1, 2019. A student who begins enrollment in the spring 2019 term must submit required verification documentation by March 1, 2020. A student who begins enrollment in the summer 2019 term must submit required verification documentation by July 1, 2020.

If the student does not provide the verification documentation by the deadline, the College will cancel his/her subsidized federal aid (excluding the Federal Pell Grant Program) for the award year.

If the student then provides the documentation after the deadline, the College will reevaluate the student’s eligibility for subsidized aid and will award aid based on the availability of federal funds at the time of documentation submission.

► **For the Federal Pell Grant Program:** A Pell applicant selected for verification must complete the verification process by the deadline published in the **Federal Register**. As of this writing, the notice for 2019-20 has not been published, but the deadline is September 21, 2020, or 120 days after the last day of the student’s enrollment, whichever is earlier. The verification process is complete when the College has received all requested documentation and a valid processed FAFSA report is on file including any necessary corrections to the report.



If the student does not provide the verification documentation or the College does not receive the valid processed FAFSA report by the deadline, the student forfeits his/her Pell grant for the award year.

Referral of Fraud Cases

Students and parents are advised that the College must and will refer to the Office of Inspector General (OIG) any credible information indicating that an applicant for Federal Student Aid may have engaged in fraud or other criminal misconduct in connection with FAFSA applications. Common misconduct includes false claims of independent status, false claims of citizenship, use of false identities, forgery of signatures of certifications, and false statements of income. **Please Note:** Fraud is the intent to deceive as opposed to a mistake on an application.

Notifications

Electronic notifications will be sent out on a monthly basis containing a link to Trinity's student financial aid web site: <http://FAStatus.trincoll.edu>; which allows the student to view all documentation needed to satisfy the verification requirements. Notifications will also contain content regarding the students/ parents responsibilities with respect to the verification including the deadlines for completing any actions required.

Monthly notifications will begin in May 2019, and will continue until either the student/ parent has submitted all required documents; or the deadline for submission has been reached.