

# **Verification and Conflicting Information Policy**

(Effective 2024-2025 Award Year due to FAFSA Simplification and FUTURE Acts updates)

## **Verification Policy**

Federal Verification is a process that requires institutions to verify the accuracy of the information provided on a student's FAFSA to ensure federal aid is distributed to those who are eligible. If the FAFSA is selected for verification by the U.S. Department of Education or Limestone University, the student is required to provide documentation to the school verifying the information that was entered on the FAFSA.

Reasons for being selected for verification can include but are not limited to: the FAFSA contains estimated information or inconsistencies, was incomplete, or was selected at random.

A student's FAFSA can be selected for Verification in two ways:

- 1. The FAFSA Processing System (FPS), a federal system, selects a certain number of FAFSAs for Verification during the processing stage, either randomly or based upon pre-determined edit criteria.
- 2. The Financial Aid Office may also select applications for Verification independently from the FPS. FAFSAs may be selected for Verification based upon criteria such as family income/asset levels, number in family/college, and significant changes in an individual student's Student Aid Index, or SAI, (formerly expected family contribution (EFC)) from year to year, etc.

NOTE: The Limestone University Financial Aid Office will always resolve conflicting information, regardless of whether the applicant is selected for Verification or not.

### Procedure:

- **1. Notification**: Students selected for verification are notified via their Limestone and personal email (if applicable). This notification outlines the documents required to verify the information provided on the FAFSA.
- 2. Items to be verified and required documentation:

### Information to be verified:

Adjusted gross income (AGI) Education credits
U.S. income tax paid Income earned from work
Untaxed portions of IRA distributions Household size

Untaxed portions of pensions IRA deductions and payments Tax-exempt interest income

Number in college Identity/Statement of Educational Purpose Child Support Received

### Common documents requested for verification include:

IRS Tax Return Transcripts or signed copies of tax returns (for the student and/or contributors)
Verification Worksheet
W-2 forms, non-tax filer statements, or other proof of income
Documentation of household size (e.g., birth certificates, marriage certificates)
Identity and Statement of Educational Purpose (see below)

- **3. Submission and Review:** Students must submit the required documentation to the Limestone University Financial Aid Office either by mail or secure email/fax. The Financial Aid Office will review and compare the information to the data reported on the FAFSA. If discrepancies are found, the Financial Aid Office may require additional documentation or explanations from the student and/or contributor.
- **4. Resolution**: The Financial Aid Office is required to submit all changes resulting from verification to the FAFSA Processing System. Once reprocessed, the student will receive a notification from the Federal Processor with a summary of the data that was changed. If the student's financial aid offer changes, the student will receive an email notification regarding the changes.
- **5. Impact:** Failure to submit required documentation will delay, and in some cases cease, the processing of financial aid. It is important for students to respond promptly and accurately to any follow-up requests.

## Verification of Identity and Statement of Educational Purpose Policy

FAFSA applicants may be selected to verify their identity and to provide a Statement of Educational Purpose.

### **Procedure:**

- **1. Notification**: Students selected for Verification of Identity and Statement of Educational Purpose will be notified via their Limestone and personal email (if applicable). The notification will include instructions on how to access the required documentation.
- **2. Required Documentation**: Students who are selected to verify identity and to sign a statement of educational purpose are required to appear in person at the Financial Aid Office with a non-expired, government-issued photo id (i.e. US passport, driver's license, or another state-issued ID) to complete the Identity and Statement of Educational Purpose form.

Applicants who are unable to appear in person must go to a notary public to sign the Identity and Statement of Education Purpose Notary form. The original form along with a copy of the non-expired,

government-issued photo ID presented to the notary must be mailed or hand-delivered to the Financial Aid Office. Faxed copies, photocopies, emailed pdf, etc. are not acceptable.

- **3. Submission and Review**: The Financial Aid Office will review the information and determine the appropriate resolution.
- **4. Resolution**: Upon review of the verification of identity and statement of educational purpose, one of the following results will be assigned and reported to the Federal Student Aid FAFSA Processing System (FPS):
  - a. Verification completed in person, no issues found
  - b. Verification completed remotely, no issues found
  - c. Verification attempted, issues found with identity
  - d. No response from application or unable to locate
- **5. Impact**: Failure to submit the identity and statement of educational purpose will result in the student being ineligible for Federal, State, and Institutional Aid.

# **Conflicting Information Policy**

Conflicting information refers to discrepancies found during the FAFSA review process.

- Applicants selected for verification Applicants are required to provide adequate documentation to
  determine if the applicants FAFSA includes discrepancies for the items that have been identified as
  subject to verification by the Department of Education. In addition to FAFSA data items identified by
  the Department of Education as subject to verification, we may also request additional
  documentation if we have reason to believe that any information on the application used to
  calculate the Student Aid Index (SAI) is discrepant or inaccurate (or if any supporting documentation
  is discrepant or inaccurate) to resolve the conflicting information.
- Applicants not selected for verification Conflicting information must be resolved regardless of whether the applicant was selected for verification. As required, the Financial Aid Office will review all tax returns/transcripts provided to the school even if they were not requested. All C Codes on the ISIR will be reviewed and resolved by the Financial Aid Office.
- Other applicant information received by the school An adequate internal system is in place to identify conflicting information that we may have regardless of the source. For example, information that could impact the financial aid status of each student applicant, e.g. (Admissions Office: High School Diploma, Business Office: Report outside awards, Registrar: Report changes in enrollment, NSLDS: Review financial aid history, including aid received from prior colleges attended).

#### **Examples of issues that may indicate Conflicting Data**

• A student is not selected for verification, but a tax return or IRS transcript is on file and information conflicts with items on the FAFSA.

- An IRS 1040 return/transcript shows single head of household and on the FAFSA shows the same person as married.
- A contributor or student reports on their FAFSA and signed a verification worksheet that they will
  not file an IRS tax return. We have reason to believe that they would have been required to file a U.S.
  Income Tax Return, as the amount of reported income on the FAFSA is greater than or equal to the
  minimum amount required to file as indicated in the instructions provided by the IRS.
- School received statements or information that suggests that the copy of the IRS Income Tax Return received is not the IRS Income Tax Return filed with the IRS.
- The student's academic progress or enrollment status on file in the Financial Aid Office doesn't agree with the information from the Registrar Office.

## **Procedure (if Conflicting Information is discovered):**

- **1. Notification**: If conflicting information is found, the student will be notified via their Limestone and personal email (if applicable). The notification will include additional documentation or clarification needed to resolve the discrepancies.
- **2. Resolution**: The student must provide the necessary documentation or explanations to resolve the discrepancies. This may involve updating the FAFSA with accurate information and submitting corrected documentation.
- **3. Impact**: Failure to resolve conflicting information can delay the processing of financial aid and/or result in a revision of the student's financial aid offer. It is important for students to respond promptly and accurately to any follow-up requests.

#### **REFERRAL OF FRAUD CASES**

The Limestone University Financial Aid Office will report any suspected fraud or falsified information (on the part of the student, the contributor, and preparer of financial aid applications or related parties) to the Office of the Inspector General of the US Department of Education for investigation. Examples of such information include false claims of independent status, false claims of citizenship, use of false identities, forgery of signature or certificates, and false statements of income.

Anyone who suspects fraud or abuse may make a confidential report by contacting the Office of Inspector General at 1800/MIS-USED, by email at oig.hotline@ed.gov, or online at <a href="https://oig.ed.gov/">https://oig.ed.gov/</a>.