

2023- 2024 Federal Verification Policy

The U. S. Department of Education requires that Federal Title IV applicants provide documentation to verify the accuracy of the information submitted on the Free Application for Federal Student Aid (FAFSA) each year. Federal regulations include verification as part of the Federal Student Aid (FSA) program requirements, and it is required for applicants for most FSA programs with the exception of students receiving only a Direct Parent PLUS, Direct Graduate PLUS or Direct Unsubsidized loan..

Federal regulations can be found online at:

- Federal Student Aid Handbook
- Application & Verification Guide
- Chapter 4: Verification, Updates, and Corrections
- 34 CFR 668.51-61

In accordance with the provisions of Subpart E, Bucknell University (BU) has established and uses written policies and procedures for verifying a student's FAFSA information.

These policies and procedures include:

- Time period within which a student must provide any documentation requested by BU
- The consequences of a student's failure to provide the requested documentation within the specified time period
- The method by which BU notifies the student of the results of its verification if, as a result of verification, the student's EFC changes and results in a change in the amount of the student's assistance under Title IV HEA programs
- The procedures BU will follow itself or the procedures BU will require a student to follow to correct FAFSA information determined to be in error
- The procedures BU will follow for making referrals to the Office of the Inspector General

Institutional Responsibility: Bucknell University requires students whose FAFSA is selected for federal verification to submit supporting documentation to verify specified data elements of his/her FAFSA unless the student qualifies for a federal exclusion. Upon receipt of all request verification documents, the OFA will complete federal verification in accordance with federal and institutional policy.

Applicant Responsibility: If Bucknell University requests documents or information from a student, the student must provide the specified documents or information if they wish to receive federal aid.

SELECTION OF APPLICANTS

Standard Selection: As stated previously, to apply for federal financial aid a student must submit a FAFSA to the Central Processing System. CPS selects which applications are selected for federal verification. Data-based statistical analysis is used to select for verification those applicants with the highest probability of error on their FAFSA submissions. The CPS sets a verification flag on the student's processed FAFSA report to indicate that the student's record has been selected for federal verification.

Update or Correction Selections: Students 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 federal verification at any time during the award year, even if the initial FAFSA was not chosen. In this case, BU must require the student to submit any additional documentation needed to complete the federal verification process.

Institutional Selection:

BU has a policy to validate FAFSA data for all students who apply for institutional need-based aid and the parents did not complete the FAFSA utilizing the IRS Data Retrieval process. The documentation needed to complete institutional verification may differ from the necessary documentation required to complete federal verification. The Office of Financial Aid will contact the student with the necessary documents needed to complete their aid application.

The policies listed below only pertain to files selected for federal verification.

Exclusions from Verification: Federal regulations stipulate that BU need not verify a student's FAFSA information if:

- The student is deceased
- The student 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 accordance with the answer to [DOC-Q15 on the verification Q and A page](#).
- The student 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 stating it has verified the student's information, and provides the transaction number of the applicable valid ISIR*.
- Post enrollment. The student was selected for verification after ceasing to be enrolled at BU, or he/she does not intend to reenroll for the award year, and no further (including late) disbursements will be made.

***Note:** BU does not accept verification completed by another institution for transfer students. These students are required to submit all required documentation and go through the verification process at BU.

Unless BU has reason to believe that the information reported by a dependent student is incorrect, it need not verify the student's parents' FAFSA information if:

- The parents are residing in a country other than the US and cannot be contacted by normal means of communication
- The parents cannot be located because their contact information is unknown and cannot be obtained by the student
- Both of the student's parents are mentally incapacitated
- Both parents or the custodial parent has died

Lastly, unless the institution has reason to believe that the information reported by an independent student is incorrect, it need not verify the student's spouse's information if:

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

Bucknell University policy regarding federal exclusions: Verification requirements will be waived for the federal exclusions listed above (with the exception of accepting another institution's verification results) provided BU receives supporting documentation pertaining to the applicable exclusion by our published verification deadline.

NOTIFICATION

A student whose FAFSA information is selected for federal verification will be notified of his/her selected status as follows:

- The CPS will notify the student on his/her Student Aid Report (SAR). Next to the EFC will be an asterisk referring to a comment in the student section of the SAR that tells the student that he/she will be asked by the school to provide documents for verification; and
- BU's Financial Aid Office notifies students (BU email account) and parents (parent email listed on FAFSA) electronically regarding any missing documentation needed to complete their federal financial aid application. Notifications are typically sent at least monthly.
- All verification requirements are also listed on the student's Self-Service Banner (SSB) account (myBucknell)

INFORMATION TO BE VERIFIED

For each award year, the Secretary of Education publishes in the Federal Register a notice announcing the FAFSA information that an institution and a student may be required to verify. The notice also specifies what documentation is acceptable for verifying FAFSA information. The Department of Education encourages students and parents to use the IRS Data Retrieval Tool (DRT) to import data from their tax return and not change it. It is the fastest, easiest, and most secure method of meeting federal verification requirements.

Students who are selected for verification are placed in one of the following groups to determine which FAFSA information must be verified.

V1—Standard Verification Group. Students in this group must verify the following if they are *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
- Household size
- Number in college

Students who are *not tax filers* must verify the following:

- Income earned from work
- Household size
- Number in college

V4—Custom Verification Group. Students must verify identity/statement of educational purpose (SEP).

V5—Aggregate Verification Group. Students must verify identity/SEP in addition to the items in the Standard Verification Group (V1).

Groups V2, V3, and V6 are reserved for future use by the Department.

For detailed information regarding federal regulations related to verification, staff members are encouraged to review the FSA Handbook yearly. The FSA Handbook provides more detailed information regarding verification, such as using a joint return to figure individual AGI and taxes paid, how to use the tax transcript and tax return to complete verification, immigrants and tax filing, and other special circumstances.

CHANGING TRACKING GROUPS and SUBSEQUENT ISIR

A student may move from Verification Tracking Group V1 or V4 to group V5 based on corrections made to his or her CPS record or on other information available to the Department. If verification was already completed for the previous group, the OFA is only required to verify the V5 information that was not already verified. If verification was not completed for the previous group, the OFA needs to verify all of the V5 information. Additionally, if the OFA receives a subsequent ISIR transaction that is flagged for verification after the student's file has already been awarded, the new ISIR must be verified. Any changes to data elements that result in a change to the EFC must be verified by requesting additional documentation and placing a hold on financial aid disbursement until resolved.

Reporting results for groups V4 and V5

Within 60 days following our request to the student for documentation of identity and high school completion BU must report the verification results for those student assigned tracking flags of V4 or V5. The information is reported via the FAA Access to CPS Online website: select the Identity Verification Results option from the main menu, enter your school identifiers, the award year, and the student identifiers.

You will then enter one of the following numeric codes that most applies:

- 1-Verification completed in person, no issues found
- 2-Verification completed remotely, no issues found

- 3-Verification attempted, issues found with identity. (You received acceptable documentation of high school completion but not the SEP or documentation of identity, or the latter was unacceptable.)
- 4-Verification attempted, issues found with HS completion. (You received the SEP and acceptable documentation of identity, but you didn't get HS completion documentation or it was unacceptable.)
- 5-No response from applicant or unable to locate
- 6-Verification attempted, issues found with both identity and HS completion

After reporting the results, the associate director will print the confirmation page for our records and upload the output into Etrieve.

If there is a change in a result you have already submitted, you can submit the new code using the above process, and must make that change within 30 days of becoming aware that a change occurred.

ACCEPTABLE DOCUMENTATION TO COMPLETE FEDERAL VERIFICATION

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 BU to complete the verification process. If a student is unable to submit any of the required documents, he/she should contact a staff member to discuss possible alternative acceptable documentation.

FAFSA Information	Acceptable Documentation
Household size	Verification worksheet
Number in college	Verification worksheet
Adjusted gross income	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
U.S. income tax paid	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
Untaxed portions of IRA distributions	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
Untaxed portions of pensions	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
IRA deductions and payments	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
Tax-exempt interest income	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
Education credits	IRS DRT*, IRS tax return transcript**, or Signed Tax Return including necessary schedules
Non-filer income earned from work	W2 form
Identity/Statement of Educational Purpose	Original valid (unexpired) government issued photo ID such as a passport or driver license and 2022-2023 Identity and Statement of Educational Purpose
Other information	Other documentation as specified by CPS or BU

*The **IRS DRT** (data retrieval tool) is the fastest, easiest and most secure method of meeting verification requirements. To verify tax data, the US Department of Education and BU 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.

Under the following conditions, the IRS DRT is NOT available:

- The person did not indicate on the FAFSA form that the tax return has been completed.
- The person filed a non-U.S. tax return.
- The marriage date is January 2022 or later.
- The person answered married on the FAFSA form and filed the tax return either as head of household or married but filing a separate return.
- The first three digits of the SSN are 666.
- Neither married parent entered a valid SSN.
- An unmarried parent or both married parents entered all zeroes for the SSN.

****The IRS Tax Return Transcript** is required if the student or parent cannot or will not use the IRS DRT and is unable to acquire a signed copy of their 2021 Tax Returns. The IRS Tax Return Transcript must be obtained from the IRS and lists the tax account information for the tax filer for tax year 2021.

Requesting a tax return transcript: a student or parent may request an IRS tax return transcript from the IRS, free of charge, in one of the following ways:

- Online by downloading an immediate PDF at <https://www.irs.gov/individuals/get-transcript>
- By calling 1800/908-9946
- By using the IRS2Go mobile app
- By mailing or faxing the paper Form 4506-T, which can be printed from the IRS website

Victims of identity theft: a victim of IRS identity theft who has been unable to obtain a 2021 IRS tax return transcript or use the IRS DRT must call the IRS's Identity Protection Specialized Unit (IPSU) toll-free at 1800/908-4490. After the IPSU authenticates the tax filer's identity, he or she can ask the IRS to mail them an alternate paper tax return transcript, known as the TRDBV (transcript database view). Students must submit this documentation to BU. A statement signed by the tax filer indicating that they were victims of identity theft and the IRS is aware of the tax related identity theft. 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 to be verified.

Filing an amended return: a student or parent who files an amended return cannot use the IRS DRT process. Instead, he or she may submit to the Office of Financial Aid the following:

- A signed copy of the original tax return that was filed, or a tax return transcript (which does not have to be signed), or any IRS transcript that includes all the income and tax information required to be verified;
- A transcript obtained from the IRS that lists tax account information of the tax filer for tax year 2021; and
- A signed copy of the IRS form 1040X (amended return) that was filed

Tax filing extensions: If an individual has been granted a filing extension by the IRS, they must provide the following documents:

- Copy of IRS form 4868 Application for automatic extension of time to file US individual tax return
- Copy of IRS form W2 for each source of employment received for tax year 2021
- If self-employed, a signed statement certifying the amount of the individual's AGI and US income tax paid for tax year 2021
- Non-filing letter from the IRS

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 US dollars) from the lines of that form that correspond most closely to the income information reported on a US income tax return to complete the FAFSA. Foreign tax filers cannot use the IRS DRT process and, therefore, must submit signed copies of their 2021 foreign tax returns translated into English with US dollar equivalents to the Office of Financial Aid.

Non-filers: A student or parent who is not required to file a US tax return is required to submit all 2021 IRS W2 forms to verify income earned from work along with a BU Non-Tax Filer Statement of Verification.

For dependent students, a parent non-filer must also submit a Verification of Non-Filing Letter from the IRS. The Verification of Non-Filing Letter is also required for independent students who did not file a federal tax return.

Rollovers and verification

Qualified rollovers from one retirement account to another are not taxable, and are not counted as untaxed income. Since neither the DRT nor a tax transcript identifies rollovers, BU must collect documentation from the tax filer regarding the rollover. This could be a signed statement with the rollover amount or a notation by the filer on the tax transcript that includes the word "rollover" beside any applicable item, similar to the instruction the IRS gives for Form 1040. The annotation must be signed and dated by the filer. For those who used the DRT, a signed confirmation that the IRA or pension distribution included a rollover would suffice; a tax transcript would only be needed if other IRS tax information was changed. See VI-Q4 on the [Q and A page](#).

Conflicting Information

Regardless of a student's verification status, all conflicting information must be resolved.

COMPLETION OF VERIFICATION

Upon receipt of all requested verification documents, the student's ISIR will be compared with the documentation provided. If all information is correct and there is no conflicting information, the information will be used to process Title IV aid. The student's Banner record will be marked as "verified", and aid will be awarded.

If the verification process shows errors in non-dollar items or errors in dollar items for the student and/or parents, the student and/or parent's information must be corrected and the correct information must be reprocessed. A correction will be submitted to CPS through Banner or FAA Access to CPS Online. When the reprocessed SAR/ISIR is received all data is reverified. If no further corrections are required, the file will be marked in Banner as "verified" and aid awarded.

Federal verification must be completed prior to any final professional judgment review.

DEADLINE AND FAILURE TO SUBMIT DOCUMENTATION

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

For subsidized federal aid programs including campus-based aid and direct loan aid (but excluding the federal Pell Grant program): Students must provide verification documentation prior to the last day of the student's enrollment. Direct Loans must be originated prior to the last day of the student's enrollment.

For the Federal Pell Grant program: For Pell Grant applicants, the Office of Financial Aid must have verification documents and a valid output document no later than 120 days after the last day of enrollment or August 1, 2024, whichever is earlier.

Failure to submit the required documents by the deadline will result in the student's ineligibility for financial aid for the award year.

Returning students who fail to submit verification documents never become complete, therefore, federal aid is not awarded to these students. Bucknell University will not disburse any federal aid until a student's file is complete. Since federal verification is not required for the disbursement of institutional funds, BU will disburse merit scholarships prior to a student completing federal verification. For a student to be considered for institutional need-based aid please refer to the Packaging and Institutional Verification procedures.

Students who fail to submit all requested verification documents cannot receive Title IV funds, but may receive institutional funds as stated above.

UPDATING FAFSA INFORMATION

Generally, a student cannot update FAFSA information that was correct as of the date the application was signed because the FAFSA is considered to be a "snapshot" of the family's financial situation as of that date. For example, if a student's family sold some stock after signing the FAFSA and spent the proceeds on an automobile or home improvement, the student cannot update the FAFSA to reflect a change in assets. After the FAFSA is signed, only certain items can be updated under the conditions listed below:

- Dependency status change: If a student's dependency status changes at any time during the award year, the student must update FAFSA information, except when the update is due to a change in the student's marital status.
- Verification of household size or number in college: A student whose FAFSA information is selected for verification of household size or number in college must update those items to be

correct as of the date of verification, except when the update is due to a change in the student's marital status

- Marital Status Change: BU may require a student to update FAFSA information for a change in the student's marital status if BU determines that the update is necessary to address an inequity or to more accurately reflect the student's ability to pay. These decisions will be made on a case-by-case basis and the reason documented in the file.

CORRECTING ERRORS ON FAFSA INFORMATION

If discrepancies are found between the documents submitted for verification and the information on the ISIR, the following procedures will be used for making corrections:

- ISIR – corrections to any items. Financial Aid staff will recalculate the EFC and submit the corrections to CPS.
- Award changes – If corrections to the ISIR due to verification results in a change to the student's award, the student will be notified electronically to view their changes in the Financial Aid portal on MyBucknell.

Although BU will be able to submit most changes to the FAFSA information, on occasion it may be necessary for the student to submit changes themselves. In such cases, BU will notify the student by email as to which data items must be corrected by the student or parent and resubmitted to CPS.

REFERRAL OF FRAUD CASES

The Bucknell University Financial Aid Office will report any suspected fraud or falsified information (on the part of the student, the parent, and preparer of financial aid applications or related parties) to the US Department of Education and all other related parties for immediate action.

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. This information will be forwarded to authorized agencies in addition to the US Department of Education for investigation such as the Office of Inspector General at 1800/MIS-USED, by email at oig.hotline@ed.gov, or online at <http://www.ed.gov/about/offices/list/oig/hotline.html>. Anyone who suspects fraud or abuse may make a confidential report contacting the Office of Inspector General.