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9 **Section Nine: Verification**

9.1 Introduction

Verification is the process of confirming the accuracy of student reported data on financial aid applications. Only a portion of the student population is selected for verification.

9.2 Selection of Applications to be Verified

The FAO verifies those applicants identified by the Department of Education (DOE). In addition, FAO's may select a student for verification if there is a discrepancy or a condition that is unusual and warrants investigation.

9.2.1 Exclusions

Listed below are certain circumstances where students do not have to complete verification. Counselors must identify and document why the student is not required to complete verification.

1. An applicant who died during the award year.
2. Not an aid recipient.
3. A student who is eligible to receive only unsubsidized student financial assistance.
4. A student was selected after ceasing to be enrolled and after all disbursements were made.
5. (Parent data) Applicants whose parents do not live in the U.S. and cannot be contacted by normal means.
6. (Parent data) Applicants whose parents can't be located because the student does not have and cannot get their contact information.
7. (Parent data) Applicants whose parents cannot comply because both are mentally incapacitated.

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8. (Parent data) Applicants whose parents have died.
9. (Spouse data) Spouse has died.
10. (Spouse data) Spouse is mentally incapacitated.
11. (Spouse data) Spouse is residing in a country other than the U.S. and can't be contacted by normal means.
12. (Spouse data) Spouse can't be located because the student does not have and cannot get his contact information.

9.2.2 Conflicting Information for Non-selected Applicants

Counselors are required to resolve any discrepancies discovered in a student's file. Because need analysis information is only collected from the DOE, and additional information typically is not requested from students who are not selected for verification, conflicting information is systematically rare.

9.3 Verification Time Frame

Students who have requested that federal output be sent to GTCC will be sent a Tracking Email/Letter listing missing items. This letter informs the student of any additional information which is required to complete his/her financial aid file [668.53(b)(1)]. If the FAO has received DOE information identifying the student as being selected for verification, the tracking items letter requests the appropriate verification items (e.g., verification form, student and parent tax transcripts).

Students are notified that there is a priority deadline to turn in documents each semester, that the majority of financial aid funds are awarded on a first-come, first-serve basis and that until the missing items are submitted to the FAO, additional processing of the file is not possible [668.53(a)(1)].

The last date to submit verification documents is the last day of the term or the student's last day of enrollment in the academic year, whichever is earlier.

- **Federal Pell Grant Recipients:** The deadline for verification is 120 days from the student's last date of enrollment or on/around September 20 (to be confirmed via the Federal Register annually). This includes making any necessary corrections to the FAFSA, submitting those corrections to the federal processor, and receiving confirmation in return.
- **Federal Loan Applicants:** GTCC requires verification to occur before determining eligibility for student loans. A federal loan application cannot be originated for a period of enrollment that has already passed.

If a student submits documentation that appears fraudulent, the FAO staff member must notify the Director of Financial Aid, who will follow the steps outlined in Section 22 (Fraud) of this Manual.

9.4 Document Collection Procedures

Required documentation items are identified and receipt date is maintained on an automated tracking system in Colleague. When documents arrive, the Financial Aid Representative or student employees enter a receipt date beside the document name. When all required documents are received, the student's file is considered complete, the documents are scanned and the applicants' names are produced on a list. These files are routed to the Financial Aid Advisors for verification, for checking of other eligibility criteria and for packaging.

9.4.1 Documentation

Documentation submitted to the FAO must be legible, appropriate, and have the student's school identification number or other identifiers for identification purposes. If the student submits a document which is not legible (e.g., a verification worksheet in which the numbers are not identifiable),

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not appropriate (a tax transcript is requested and the student submits a W-2), or not identifiable (student submits a copy of the step-parents tax transcript and the last name does not match the student's and there is no student social security number) the documents will be returned and additional documentation will be requested. The document will be tracked on the student's record as being returned to the student.

Filing extensions - For students and parents granted a tax filing extension, we accept a copy of IRS Form 4868, *Application for Automatic Extension of Time to File U.S. Individual Income Tax Return*. They must also provide a copy of all their W-2 forms or, if they are self-employed, a signed statement with the amount of their AGI and their U.S. income taxes paid, a copy of the IRS's approval of an extension beyond the automatic six-month extension, and a verification of non-filing from the IRS.

9.4.1.1 Electronic Signatures

We accept an electronic copy of a return that was electronically signed as long as it complies with the Electronic Signatures in Global and National Commerce (ESIGN) Act. But a signature on Form 8879, the IRS e-file Signature Authorization, is not an acceptable substitute for a signature on the tax return." [AVG-83, FSA Handbook 19-20]

We accept Adobe Sign and DocuSign. We will accept others IF they comply with ESIGN requirements.

Adobe –

In the United States, Adobe warrants that Adobe Sign is fully compliance with the ESIGN Act of 2000. In addition, it complies with the European Union regulation on electronic identification and trust services (eIDAS), Australia's Electronic Transaction Act, Canada's Uniform Electronic Commerce Act (UECA), the Electronic Communications Act 2000 (c.7) in the United Kingdom and more. https://acrobat.adobe.com/content/dam/doc-cloud/en/pdfs/Adobe_E-Sign_Act_WhitePaper_ue.pdf
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DocuSign -

Lawful and court-admissible

DocuSign eSignature complies with the U.S. ESIGN Act and UETA, as well as the EU eIDAS Regulation. We automatically generate and store a robust audit trail for every agreement.

<https://www.docusign.com/products/electronic-signature>

9.4.2 Processing Time Period

Students are notified that the majority of financial aid funds are awarded on a first-come, first-serve basis and that until the missing items are submitted to the FAO, additional processing of the file is not possible [668.53(a)(1)].

9.4.2.1 Failure to Comply

Students who fail to submit verification documents have files that never become complete; therefore, aid is not awarded for these students [668.53(a)(2); 668.60].

9.4.2.2 Submission After Deadline

Students who submit verification and/or other necessary documents far beyond the time they were requested will be awarded aid on an availability basis. Typically, by the end of the summer, aid funds other than federal loans, state grants, and the Federal Pell Grant are depleted.

9.4.3 Notification of Verification to Applicants

Students are notified that they are selected for verification on the Student Aid Report (SAR). In addition, the tracking letter indicates to the student that he/she has been selected for verification.

9.5 Verification of Data Elements

GTCC systematically verifies only those data elements required by the federal government. However, Aid Administrators are free to ask for additional information if further investigation is needed to resolve a discrepancy.

9.5.1 Standard Verification Group – V1

9.5.1.1 Adjusted Gross Income for tax filers

9.5.1.2 U.S. Income Tax Paid for tax filers

9.5.1.3 Other financial items

Untaxed portions of IRA distributions, untaxed portions of pensions, IRA deductions and payments, tax-exempt interest income, education credits, SNAP benefits, and child support paid.

9.5.1.4 Household Size

Household size is verified by comparing the Verification Worksheet to the Student Aid Report (SAR). Discrepancies must be corrected before further processing.

9.5.1.4.1 Exclusions

In those cases where regulations permit colleges to waive the requirement of verifying household size, GTCC does waive this requirement.

9.5.1.5 Number in Postsecondary Institutions

Number of family members (excluding parents) enrolled at least half-time in postsecondary institutions is verified by comparing the Verification Worksheet to the Student Aid Report (SAR). Discrepancies must be corrected before further processing).

9.5.1.5.1 Exclusions

In those cases where regulations permit colleges to waive the requirement of verifying number in college, GTCC does waive this requirement.

9.5.1.6 Income earned from work for non-tax filers

9.5.2 V2 – Reserved for future use by the Department.

9.5.3 V3 – Reserved for future use by the Department.

9.5.4 Custom Verification Group – V4

Verify high school completion status via the official high school transcript and confirm identity via the Identity/Statement of Educational Purpose form and documentation.

9.5.5 Aggregate Verification Group – V5

All V1 and V4 requirements.

9.5.6 V2 – Reserved for future use by the Department.

9.5.7 Institutional Discretionary Items

The FAO verifies those applicants identified by the Department of Education (DOE). Aid Administrators may select a student for verification if there is a discrepancy or a condition that is unusual and warrants investigation. If a student submits verification documentation (e.g., tax transcript), the FAO staff must verify the information on the document against the information in the student's file [668.14(f)].

9.6 Tolerances

When verifying a student's record, there are two instances when information does not match between the verification document and the SAR, and for which the SAR does not have to be corrected [668.59].

1. When the only discrepancies are dollar items that do not exceed \$25.
2. When the EFC is 0 and the changes would result in the EFC remaining 0.

Although tolerance levels are allowable, the FAO systematically corrects all data corrections by transmitting them to the Central Processing System.

9.7 Notification to Students

Students are notified of the results of verification when a new Student Aid Report is generated. The student is not required to sign the FAO-generated electronic SAR correction.

9.7.1 Correction Procedures

As stated in 9.6, GTCC submits all data corrections to the Central Processing Center. Students wishing to make corrections to their data are encouraged to go online at www.fafsa.gov.

9.7.2 Overpayments

FAO policies and procedures are designed to eliminate the possibility of an overpayment from any fund. If however, an overpayment does occur, the Financial Aid Technician and the Finance Office place a hold on the student's accounts receivable record, and a letter is sent to the student. Overpayments due to student error are assigned to the Department of Education for collection if the student does not contact GTCC within a reasonable period of time.

9.8 Updating Requirements and Procedures

There are three items that may be updated (student reported the family circumstance accurately on the initial application,

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but the student's situation has changed) [668.55]. When students notify the aid office of an allowable update, the Aid Administrator may recalculate the student's EFC and the new figure may be used to award financial aid. An update may occur for:

1. Dependency status (Dependency status may not be changed for previously certified Stafford Loans, and may not be changed due to marital status – see note below).
2. Family size.
3. Number of family members enrolled in a postsecondary institution.

At our discretion, we may update even when the update is due to a change in the student's marital status if we deem it necessary to address an inequity or to reflect more accurately the applicant's ability to pay. Such a decision must be on a case-by-case basis, and the reason must be documented in the student's record.

9.9 Corrections policy

Corrections made as a result of verification will be made by the College. Corrections that need to be made to other items, such as a change in dependency status, the student will be notified in writing or by email that a correction needs to be made to the FAFSA by the student and/or the parent before processing can continue.

9.10 Interim Disbursements

Because the FAO is liable for disbursements made prior to verification, it is the policy of the Office neither to award nor to disburse funds until verification is complete. The FAO does not allow interim disbursements. Students must complete the verification process before aid is awarded or disbursed.

9.11 Selection for verification after disbursement

On occasion, students are selected for verification after one or more disbursements have been made to the student. This is usually the result of the student making corrections to their

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FAFSA after they have been awarded aid for the year. In these cases, the FAO will cancel all future disbursements until the necessary documentation is received, processed and continue eligibility is established. If the student's eligibility should decrease, the student will owe an overpayment to the affected programs, but can keep any Direct Loan money received and FWS wages earned.