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VERIFICATION 2024-2025

Terry Bland




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Federal Register

For each award year, the Secretary publishes in the **Federal Register** a notice announcing the FAFSA information that an institution and an applicant may be required to verify, as well as the acceptable documentation for verifying FAFSA information. This is the notice for the 2024–2025 award year, Assistance Listing Numbers 84.007, 84.033, 84.063, and 84.268.



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### Selected for Verification

If the Secretary selects an applicant for verification, the applicant's Institutional Student Information Record (ISIR) includes flags that indicate

- (1) that the applicant has been selected by the Secretary for verification and
- (2) the Verification Tracking Group (VTG) in which the applicant has been placed.




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### SAR now FAFSA Submission Summary

Beginning with the 2024-2025 award year, the Student Aid Report (SAR) is being replaced with the [FAFSA Submission Summary](#). As was the case for the SAR, the FAFSA Submission Summary provided to the applicant will indicate that the applicant's FAFSA information has been selected for verification and direct the applicant to contact the institution for further instructions for completing the verification process.




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### Pandemic Flexibilities Ended

To help institutions and applicants deal with the challenges resulting from the novel coronavirus disease (COVID-19) pandemic, the Secretary provided flexibilities to the verification regulations. [On April 10, 2023, the federally declared national emergency related to the COVID-19 pandemic ended.](#) As a result, these flexibilities expired at the end of the first payment period that began after April 10, 2023. Under [34 CFR 668.4](#), payment periods are defined for a student enrolled in an eligible program measured in standard terms, as the term, *i.e.*, semester, trimester, or quarter.




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### FUTURE Act Provisions

In accordance with the Fostering Undergraduate Talent by Unlocking Resources for Education (FUTURE) Act, much of the applicant's tax return information, including information from their spouse and parents, will come directly from the IRS and will not be viewable by the student and other contributors.

- Such information that is **transferred and not edited will essentially be verified and need no further verification.**
- However, for instances where income and tax information cannot be obtained directly from the IRS, the applicant would have to manually enter the necessary information into the FAFSA, and that **manual entry may be subject to verification.**




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### Acceptable Documentation

The following chart lists, for the 2024-2025 award year, the FAFSA information that an institution and an applicant and, if appropriate, the applicant's parent(s) or spouse may be required to verify under [34 CFR 668.56](#). The chart also lists the acceptable documentation that must, under § 668.57, be provided to an institution for that information to be verified.




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### Income for Tax Filers

- Adjusted Gross Income (AGI)
- Income Earned From Work
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Credits
- Foreign Income Exempt from Federal Taxation




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### Acceptable Documentation

- Items a through h, if transferred directly from the IRS and unchanged, do not need to be verified.
- When information is not transferred from the IRS, and for item i, the following documentation is sufficient for verification:
  - (1) A transcript<sup>1</sup> obtained at no cost from the IRS, or a foreign government, that lists 2022 tax account information of the tax filer; or
  - (2) A copy of the income tax return<sup>1</sup> and the applicable schedules<sup>1</sup> that were filed with the IRS, or a foreign government that lists 2022 tax account information of the tax filer.
  - (3) If item d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.



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### Footnotes (signatures & foreign tax return)

- <sup>1</sup>This footnote applies, where applicable, whenever an income tax return, the applicable schedules, or transcript is mentioned in the above chart.
- The copy of the 2022 income tax return must include the signature of the tax filer, or one of the filers of a joint income tax return, or the signed, stamped, typed, or printed name and address of the preparer of the income tax return and the preparer's Social Security number, Employer Identification Number, or Preparer Tax Identification Number.
  - For a tax filer who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, the institution must use the income 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.



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### Footnotes (cannot obtain)

- An individual who did not retain a copy of his or her 2022 tax account information, and for whom that information cannot be located by the IRS or other relevant tax authority, must submit to the institution—
- Copies of all IRS Form W-2s for each source of 2022 employment income or equivalent documents; or
  - If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2022; and
  - Documentation from relevant tax authorities other than the IRS that indicates the individual's 2022 tax account information cannot be located; and
  - A signed statement that indicates that the individual did not retain a copy of his or her 2022 tax account information.



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### Clarification

#### Employed (W2)

- a. Copies of all IRS Form W-2s for each source of 2022 employment income or equivalent documents; or
- b. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2022 tax account information cannot be located; and
- c. A signed statement that indicates that the individual did not retain a copy of his or her 2022 tax account information.

#### Self-employed

- a. If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2022; and
- b. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2022 tax account information cannot be located; and
- c. A signed statement that indicates that the individual did not retain a copy of his or her 2022 tax account information.



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### Identity Theft

If an individual who was the victim of IRS tax-related identity theft is unable to obtain a TRDBV, the institution may accept an equivalent document provided by the IRS or a copy of the signed 2022 income tax return the individual filed with the IRS.



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### Income Information for Tax Filers with Special Circumstances

- Adjusted Gross Income (AGI)
- Income Earned from Work
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Credits
- Foreign Income Exempt from Federal Taxation



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### Clarification of Special Circumstances

- A joint income tax return was used in FTI, but there has been a change in marital status or marital partner.
- An IRS filing extension exists that is greater than the automatic 6-month extension.
- A rollover exists.
- An identity theft situation exists.
- A tax return was amended.



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### Acceptable Documentation for Change in Marital Status or Partner

- (1) For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return—
  - (a) A [transcript obtained from the IRS](#) or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or
  - (b) A [copy of the income tax return](#) and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and
  - (c) A [copy of IRS Form W-2](#)<sup>2</sup> for each source of 2022 employment income received or an equivalent document.<sup>2</sup>



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### Footnotes (cannot obtain W2)

<sup>2</sup>An individual who is required to submit an IRS Form W-2 or an equivalent document but did not maintain a copy should [request a duplicate from the employer](#) who issued the original or from the government agency that issued the equivalent document.

If the individual is unable to obtain a duplicate W-2 or an equivalent document in a timely manner, [the institution may permit](#) that individual to provide a [signed statement](#), in accordance with 34 CFR 668.57(a)(6), that includes—

- (a) The amount of income earned from work;
- (b) The source of that income; and
- (c) The reason why the IRS Form W-2, or an equivalent document, is not available in a timely manner.



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### Acceptable Documentation for Filing Extensions > 6 months

(2) For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022—

- (a) A **signed statement** listing the sources of any 2022 income and the amount of income from each source;
- (b) A **copy of the IRS's approval of an extension** beyond the automatic six-month extension for tax year 2022;<sup>3</sup>
- (c) A **copy of IRS Form W-2**<sup>2</sup> for each source of 2022 employment income received or an equivalent document;<sup>2</sup> and
- (d) If self-employed, the **signed statement** must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.



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### Footnotes (military service)

<sup>3</sup>For an individual who was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, an institution must accept a statement from the individual certifying that he or she has not filed an income tax return or a request for a filing extension because of that service.

**PERSONAL NOTE:** I would want a copy of orders or a DD-214 to corroborate the timeline.



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### Acceptable Documentation for Rollovers

(3) If d or e contains a rollover, collect a **signed statement** confirming the amount of the rollover in the untaxed pension or IRA distribution.

**Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.**

Note: An institution may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When an institution receives such information, it must be used to reverify the income and tax information reported on the FAFSA.



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### Acceptable Documentation for Identity Theft

- (4) For an individual who was the victim of IRS tax-related identity theft—
  - A Tax Return DataBase View (TRDBV) transcript<sup>1</sup> obtained from the IRS; and
  - A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS has been made aware of the tax-related identity theft.

Note: Tax filers may inform the IRS of the tax-related identity theft and obtain a TRDBV transcript by calling the IRS's Identity Protection Specialized Unit (IPSU) at 1-800-908-4490. Unless the institution has reason to suspect the authenticity of the TRDBV transcript provided by the IRS, a signature or stamp or any other validation from the IRS is not needed.



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### Acceptable Documentation for Amended Tax Returns

- (5) For an individual who filed an amended income tax return with the IRS,
  - a signed copy of the IRS Form 1040X that was filed with the IRS for tax year 2022 or
  - documentation from the IRS that include the change(s) made to the tax filer's 2022 tax information, in addition to one of the following—
    - (a) Updated income and tax information from the IRS on an ISIR record with all tax information from the original tax return;
    - (b) A transcript obtained from the IRS that lists 2022 tax account information of the tax filer(s); or
    - (c) A signed copy of the 2022 IRS Form 1040 and the applicable schedules that were filed with the IRS.



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### Income Information for Non-Tax Filers

- Income Earned from Work

Note: The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.



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### Acceptable Documentation for Non-Tax Filing Status

For an individual who has not filed and, under IRS regulations, is not required to file a 2022 income tax return—

- (1) A [signed and dated statement](#) certifying—
  - (a) That the individual is not required to file a 2022 income tax return; and
  - (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year;



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### Acceptable Documentation for Non-Tax Filing Status (continued)

- (2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), [that they do not have an SSN, ITIN, or EIN](#); and
- (3) A [copy of IRS Form W-2](#) <sup>2</sup> for each source of 2022 employment income received or an equivalent document <sup>2</sup>; and
- (4) Except for dependent students, [verification of non-filing](#) <sup>4</sup> for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023.



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### Footnotes (unable to obtain confirmation)

<sup>4</sup>If an individual is unable to obtain verification of non-filing from a relevant tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a [signed statement](#) certifying that the individual attempted to obtain the verification of non-filing from the relevant tax authority and was unable to obtain the required documentation.



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### Family Size (FTI)

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified.



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### Family Size (manual or FTI but updated)

However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

- A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024-2025 award year and the relationship of that family member to the applicant.



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### Family Size (exception to verification)

Note: Verification of family size is not required if—

- For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or
- For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.



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### Identity Statement of Educational Purpose

- (1) An applicant must appear in person and present the following documentation to an institutionally authorized individual to verify the applicant's identity:
  - (a) An unexpired valid government-issued photo identification<sup>5</sup> such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport. The institution must maintain an annotated copy of the unexpired valid government-issued photo identification that includes—
    - i. The date the identification was presented; and
    - ii. The name of the institutionally authorized individual who reviewed the identification; and
  - (b) A signed statement using the exact language as [presented in the Federal Register], except that the student's identification number is optional if collected elsewhere on the same page as the statement.



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### Footnotes

<sup>5</sup>An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.



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### Verification Tracking Groups

The VTG indicates which FAFSA information needs to be verified for the applicant and, if appropriate, for the applicant's parent(s) or spouse.

- V1 – Standard Verification Group
- V2 – Reserved
- V3 – Reserved
- V4 – Custom Verification Group
- V5 – Aggregate Verification Group



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### V1 – Standard Verification Group

**Tax Filers**

- Adjusted Gross Income
- Income Earned From Work
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Tax Credits
- Foreign Income Exempt from Federal Taxation

**Non-Tax Filers**

- Income Earned from Work

**Tax Filers and Non-Tax Filers**

- Family Size



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### V4 – Custom Verification Group

**Tax Filers**

- Identity/Statement of Educational Purpose

**Non-Tax Filers**

- Identity/Statement of Educational Purpose



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### V5 – Aggregate Verification Group

**Tax Filers**

- Adjusted Gross Income
- Income Earned From Work
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Tax Credits
- Foreign Income Exempt from Federal Taxation

**Non-Tax Filers**

- Income Earned from Work

**Tax Filers and Non-Tax Filers**

- Family Size
- Identity/Statement of Educational Purpose



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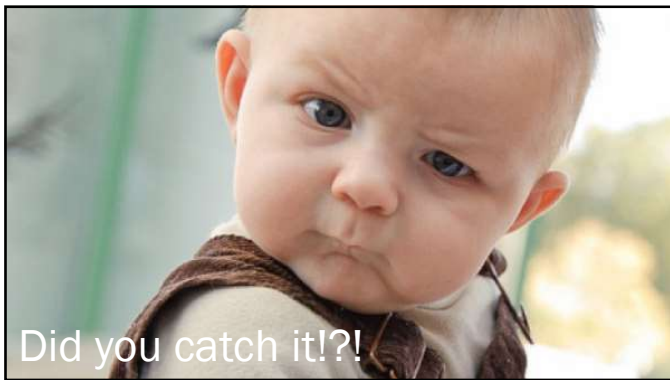
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**No Flags in ISIR**


**OLD ISIR:** The IRS DRT Data Match Flags (02/04) have been removed.

**NEW ISIR:** There are now fields for data pulled from FTI and separate fields for manually entered data.

WHAT DOES  
IT MEAN?

Your internal reporting just got more

Instead of 1 set of fields; you now have 2.



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### Joint Tax Returns and Marital Status

According to an earlier slide, there is a question regarding a change in marital status. If a parent files a joint return with his spouse in 2022, then divorced in 2023 and also remarried in 2023 prior to filing the FAFSA for 2024-2025...

What happens? Will we need to be on the lookout for this situation?



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### Student Marital Status

Beginning with the 2024-25 award year, students who are separated will no longer be considered married and should not indicate they are married on the FAFSA.

Unless independent by a criterion other than marriage, they will be considered dependent students.



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### Separation

It is unclear if the definition of separated is now limited to legal separations, or also includes informal separations.

It is also unclear whether the definition of separated includes parents who are considered unmarried for head of household status (e.g., living apart for the last six months of the tax year).

The U.S. Department of Education will need to publish guidance to clarify the definition of separated.

Mississippi does not have a "legal separation."



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### Head of Household

We will have one parent file Head of Household and another either will file Single or not file at all.

In this situation, the student "should" be identifying both parents via the parent wizard. Both parents would provide consent and both tax returns would be pulled, or one parent would be identified as a non-filer. **Either situation produces a conflict that must be resolved if the student is selected for verification.**

If the student is not selected, and/or there is nothing to trigger a review (no conflicts were presented), you are able to work with what was provided. **Only if there is conflicting information would you need to resolve the disputed status.**



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### Dependency Override

The Act adds to the dependency override (DO) provision by noting that a DO may be warranted when a student is unable to contact their parents or when contact poses a risk to the student. Circumstances where contact is not possible or risky can include human trafficking (as described in the Trafficking Victims Protection Act); legally granted refugee or asylum status; parental abandonment; estrangement; or student or parent incarceration. However, **incarceration by itself is not sufficient** to make a student automatically independent. **The financial aid administrator would need to determine that the student is unable to contact their parent(s) or that contact would pose a risk to the student.**



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### Housing Plans

Several changes to the 2024-25 FAFSA may impact a school's ability to complete the institutional awarding and packaging process. Examples include **removal of the housing question**, removal of the ability for independent students to elect to provide parent information (including financial information), and removal of the question asking the student whether they are interested in work study.

An institution may separately ask students to indicate a choice (e.g., clarify their housing plans to produce a more accurate COA) but **may not require this information as a condition of awarding** or disbursing federal student aid.



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### NASFAA Concerns

We have several questions on the treatment of income earned from work and how that map to verification.

We also have questions about how the application is processed when there is a parent who filed and a parent who is a non-filer and, the corresponding needs around verification. (Head of Household conflict)

Lastly, we have not been able to get confirmation around the tax return line items given that on the 1040, line 1 is now in multiple parts on the 2022 tax form.



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### NASFAA Concerns

Without IRS Request Flags and Data Field Flags, it is still unclear how the FAA will know the FTI was unchanged after the FADDX was used. Can we assume that, if there is FTI in data elements (a) through (h) in the Federal Register, those data elements cannot be changed by the student/parent and are therefore considered verified unless they are changed by the FAA (e.g., for PJ)?

That's correct. Students and parents cannot change the FTI data received from the IRS, and this FTI counts as verified, as noted in the FR. The ISIR has separate data fields for the FTI data vs manually reported AGI, taxes paid, IRA and pension distributions, IRA deductions/payments, tax exempt interest, and education tax credits. FAAs may submit a change if there are good reasons, use another dollar amount, and they would have to set the PJ flag so those amounts are used in the SAI calculation.



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### NASFAA Concerns

What about Foreign Income Exempt from Federal Taxation? Since this is manually entered, does this mean the school will need to collect documentation from everyone in V1 and V5 to verify this? Or, can verification be limited to only those who report a Foreign Earned Income Exclusion amount? As it is currently written, the school has to collect tax documentation (Schedule 1 or a tax transcript) for everyone who is selected just to verify the income exclusion, even when all the other data elements (a) through (h) are not required to be verified. Then, when the school collects that documentation, they have to check for conflicting information, which results in the de facto verification of the other income items on those documents.

Yes, verification of Foreign Earned Income Exclusion is limited to those who report a Foreign Earned Income Exclusion amount. And yes, it could be seen as a kind of de facto verification but only to the same extent that any check for conflicting information when a school has received documentation from the student is similar to doing verification. But the school will already have the tax document, and the expectation is that there will not be many instances of students/parents who report this amount on their tax return.



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### NASFAA Concerns

Why isn't the Foreign Earned Income Exclusion included in FADDX anyway, so as to avoid the above entanglement?

The FUTURE Act tells us the items we receive from the IRS. The Foreign Earned Income Exclusion is not included in the FUTURE Act, so it is not included in FTI data.



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### NASFAA Concerns

Family size is something the student/parent is allowed to change, so how is the FAA made aware of this when it is changed?

If family size does not come from FTI, it will be displayed in the manually reported amount field. As with #1 above, FTI fields and manually reported fields are different.



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### NASFAA Concerns

Family size is something the student/parent is allowed to change, so how is the FAA made aware of this when it is changed?

If family size does not come from FTI, it will be displayed in the manually reported amount field. As with #1 above, FTI fields and manually reported fields are different.



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### NASFAA Concerns

The Federal Register added a word that we think will be problematic (and resembles verification of exceptionally low income which ED has previously said is not required). For non-tax filers, the FR added the highlighted part:

(1) A signed and dated statement certifying—

(a) That the individual is not required to file a 2022 income tax return; and

(b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year;

What is the school to do with "resources" if they are reported? There is no field on the FAFSA/ISIR in which to put income and resources that are not income earned from work, so why is it there?

The phrase you highlighted was in last year's and previous Federal Register notices under a footnote for individuals who did not have a Social Security number, an Individual Taxpayer Identification Number, or an Employer Identification Number. Instead of including it in a footnote, we included it in the body of the notice to further define "income" for non-tax filers generally. If an individual has resources to report with their earnings and other income, they should include them in their signed and dated statement. Reporting of these amounts helps FAAs to be sure that the student's or parent's status as a non-filer is correct.



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### NASFAA Concerns

For the scenario above, if the income exclusion is the only income item needing to be verified, does the school still need the whole 1040 plus Schedule 1, or just Schedule 1 (which we assume must be signed if they submit it without the 1040)?

Yes, a copy of the tax return or a transcript is required. As stated in the FR— items a through h, if transferred directly from the IRS and unchanged, do not need to be verified.



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### NASFAA Concerns

We understand that amended tax return information will come over via FADDX if the tax return is filed in time for the data to be picked up. The September 19, 2023 Federal Register says the tax return data are considered verified if pulled in and unchanged. Does this mean that the only time a school needs to verify using the amended tax return instructions in the FR is when the school happens to find out that an amended tax return was filed after the FAFSA was filed? Again, since there is no longer an IRS Request Flag 07, there's no way for a financial aid administrator to know otherwise. Correct? Will there be postscreening to alert the school if an amended tax return was filed after the FADDX was used?

There will be no amended tax return indicator in the FA-DDX. Part of the change with the FA-DDX is that we will get the most recent data at the IRS. So if someone filed an amended return the FTIM module would be getting that FTI data from that amended return so there is no need for an indicator if the amended tax return was filed before the FAFSA. If an amended tax return was filed after we get the IRS data for the FAFSA, there will be no notification at that point. So, in this case the school has conflicting information to resolve.



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