

Bon Secours Health System, Inc.

Richmond Region Bon Secours Memorial College of Nursing

Title: Financial Aid Verification Policy

Policy

Date: 4/15/2008

No.: ADM 4.04

Rev.:

8/1/2013, 8/1/2016

Areas Affected: All BSMCON

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POLICY STATEMENT:

The College conducts financial aid verification in accordance with the Code of Federal Regulations. The purpose of this policy is to clarify the College's financial aid verification requirements to ensure complete adherence with the requirements of 34 Code of Federal Regulations (CFR) Section 668.51-61.

DEFINITIONS:

These definitions apply to these terms as they are used in this policy:

Expected Family Contribution: The term "expected family contribution" refers to an estimate of the parents' and / or student's ability to contribute to postsecondary education expenses. Generally speaking, the lower the expected family contribution, the higher the financial aid award from the College.

Verification: The term "verification" refers to a review process in which the Office of Financial Aid determines the accuracy of the information provided on the student's financial aid application.

Financial Aid Applicant: A "financial aid applicant" at the College is defined as a recipient of Federal Title IV Aid who enrolled during the award year.

POLICY:

In compliance with CFR 668, Subpart E, the College will verify ALL selected Financial Aid applicants. If the College has reason to believe the applicant's Free Application Federal Student Aid (FAFSA) information is inaccurate, it will verify the accuracy of that information regardless of whether or not the application is selected for verification. If a student's FAFSA application is selected for verification, he/she must complete the verification process or forfeit all federal student aid. Notifications will be sent to students selected for verification via e-mail and regular mail that notifies them of information that is required of them to complete the verification process. Once required verification documents are received, a review of documents are generally completed within two weeks. During peak periods (May to September) additional time may be allowed to complete the review.

V1 – Standard

The primary items that are verified are:

- A. Tax Filers
 - Household size
 - Number in college

Reference Policy #

Approved by: Signature

Dean of Student Services

Provost/VP

Title

Committees and Dates:

Office of Financial Aid-5/21/2012; 5/13

Policy Committee- 5/21/2012; 5/20/13, 5/16/16

Key words: Prior Financial Aid

- Supplemental Nutrition Assistance Program, commonly known as Food Stamps
- Adjusted Gross Income (AGI) for both student and parents
- U. S. Taxes Paid for both student and parent's

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- IRA/Keogh Deductions
- Tax-exempt interest
- Untaxed portions of IRA distribution
- Untaxed portions of pensions
- Educational Credits
- Child Support Paid (must be verified if reported on FAFSA)

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Child support received

B. Non-Tax Filers

- Household size
- Number in college
- Supplemental Nutrition Assistance Program, commonly known as Food Stamps
- Income earned from work
- Child Support Paid (must be verified if reported on FAFSA)
- Child support received

V4 - Custom

The primary items that are verified are:

- High School Completion Status
- Identity/Statement of Educational Purpose
- SNAP Benefits (if reported on ISIR)
- Child Support Paid (if reported on ISIR)

V5 - Aggregate

The primary items that are verified are:

- High School Completion Status
- Identity/Statement of Educational Purpose AND
- All items indicated-Tax Filer (V1)
- All items indicated-Non-Tax Filer (V1)

V6 – Household Resources

The primary items that are verified are:

- All items indicated-Tax Filer (V1), or
- All items indicated-Non-Tax Filer(V1), AND
- Other untaxed income from 2016-2017 FAFSA:
- Payments to tax-deferred pension and savings
- Child support received
- Housing, food and other living allowance paid to members of the military, clergy and others
- Veterans noneducation benefits
- Other untaxed income
- Money received or paid on the applicant's behalf

AWARDING AND DISBURSEMENTS

Students selected for verification will not be packaged with financial aid awards until all required verification documents have been received and required processing completed.

VERIFICATION EXCLUSIONS

Student

The College does not verify student information if any of the following conditions apply:

- The student dies during the award year, even if the College made an interim disbursement prior to the student's death.
- The student is not a Title IV recipient.
- The student is only eligible for Unsubsidized Stafford or PLUS Loans. A student cannot avoid the verification requirements by choosing to borrow an Unsubsidized Loan instead of a Subsidized Loan.
- The student is verified by another school for the same award year.
- The student resigns from the school and subsequently is selected.

Spouse

The College does not verify spouse information if any of the following conditions apply:

- The spouse is deceased or mentally or physically incapacitated.
- The spouse is residing in a country other than the United States and can't be contacted by normal means.

Parents

The College does not verify a dependent student's parents' information if any of the following conditions applies:

- The student's parents are deceased or mentally or physically incapacitated. (If both parents
 are dead, the student is an orphan and thus is an independent student. If the parents die
 after the student has applied, the student must update his or her dependency status.)
- The parents are residing in a country other than the United States and can't be contacted by normal means.

Students who Resign from the College

Students who resign from the College before completing the verification process have 14 calendar days after resigning to complete the verification process to be eligible for a post-resignation disbursement. If the student does not complete the process, the student will not be eligible for a post-resignation disbursement.

The College will document the basis for any exclusion in the student's file. These exclusions do not affect any other part of required verification; the selected application must still be verified according to all other requirements.

PROFESSIONAL JUDGMENT:

All students who request through Professional Judgment an adjustment in FAFSA data elements affecting EFC (for example income, assets, household size) and/or a modification to their Cost of Attendance are required to complete the verification process prior to any consideration of the request. This requirement applies to ALL students whether or not they have been selected for verification by the FAFSA Central Processing System (CPS)

DOCUMENTS:

- Students selected for verification will need to submit:
- Student/Spouse IRS Tax Return Transcript*
- If applicable, Student/Spouse IRS Tax Account Transcript*Student's W-2 form(s)
- Parents' IRS Tax Return Transcript* (For Dependent Students Only)
- If applicable, Parents' IRS Tax Account Transcript* (For Dependent Students Only)
- Parents' W-2 form(s) (For Dependent Students Only)
- For Married Students Only: Spouse's W-2 forms
- Verification Worksheet
- If applicable, Child Support Paid, Signed Statement with Information on Verification Worksheet
- If applicable, Child Support Recieved, Signed Statement with Information on Verification Worksheetlf applicable, Food Stamps Received, Official Documentation from the State Agency
- If applicable copy of high school diploma or final high school transcript
- If applicable, notarized Identity and Statement of Educational Purpose form

*Tax-filers (IRS Data Retrieval not confirmed) – all tax filers that the IRS Data Retrieval was unsuccessful must provide an official tax return transcript from the IRS. These tax return transcripts can be requested online at www.irs.gov or by calling (800) 908-9946. Tax return transcripts are not the same as copies of tax returns. The College must be notified if a tax transcript is not available.

Documentation submitted to the College must be legible, appropriate, and have the student's ID number (or SSN) for identification purposes. If the student submits a document which is not legible, appropriate, or unidentifiable, the documents will be returned and a request for additional documentation will be sent.

NON-TAX-FILERS:

Student/spouse/parent who is not required to file a federal tax return must indicate this on the FAFSA and also on the verification worksheet.

SEPARATE RETURNS:

Student/parent who is married and filed separate returns must report income information for both student/spouse and both parents on the FAFSA and are required to provide verification documents if selected for verification.

TAX EXTENSION:

For those students/parents who have filed for a tax extension, a copy of the tax filing extension form and copies of all W-2's must be submitted to the College. Once federal taxes have been filed, a tax return transcript and tax account transcript must be submitted to the College.

INTERPRETATION OF VERIFICATION DOCUMENTS:

Information on official documents such as the IRS tax return transcript, W-2 form, and verification worksheet is considered final information. In the event that verification documents differ from the amounts reported on the FAFSA the College will submit a correction to FAFSA Central Processing System.

NOTIFICATION METHODS

During peak periods (May to September), it may take a minimum of 5 business days for documents to be reviewed and logged into the College system. Students may track the documents by logging onto Financial Aid Student Portal to view status of their forms.

REFERRALS

If it is determined that a student has received funds which they were not eligible to receive, the student must repay the amount. If a repayment is not made, the overpayment must be referred to the U.S. Department of Education.

If the College suspects that a student, employee, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to fraudulently obtain federal funds, it must report those suspicions and provide any evidence to the Department of Education's Office of Inspector General (OIG).

REFERENCES:

34 C.F.R. § 668.51-61, Subpart E

Dear Colleague Letter GEN-15-11, Published June 29, 2015, 2016-2017 Award Year: FAFSA Information to be Verified and Acceptable Documentation.