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FAFSA Verification: Good Government or Red Tape?

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Overview

Deja from Minnesota is your typical low-income financial aid applicant selected for FAFSA verification, an information review process designed to prevent improper payments by the federal government. In order to complete the necessary steps of the verification process, Deja had to find multiple W-2s and tax forms. One of her W-2s, from a fast-food job, had only ever been provided to her online. Even though she had not worked there for some time, she had to regain access to the company's online system when she could not obtain a physical copy of her W-2. Deja also had to obtain her mother's tax documents, a process that was complicated by the fact that her mother works long hours. Finally, Deja doesn't have internet at home, making it even more difficult for her to find time with her mother to access tax documents online.

Deja's story is not unique. Each year, there are millions of students nationwide who are selected for this audit-like process after completing their Free Application for Federal Student Aid (FAFSA). In fact, over half of Pell Grant-eligible FAFSA applicants were selected for verification for the 2016-17 FAFSA filing cycle. That's over 5.4 million students who spent hours combing through documents, visiting online web portals, going to the IRS office in person to request a transcript, and meeting with their financial aid administrators to prove that what they said on the FAFSA was accurate.

FAFSA verification is a black box in the higher education policy space. It is required to help the U.S. Department of Education manage the improper payment rate for the Pell Grant and federal student loan programs. The Department states a goal to keep improper payments under 7.85 percent for the Pell Grant program, and was dinged in fiscal year 2017 for just missing the mark with a rate of 8.2 percent. Yet there is no public information about how students are selected for verification or what impact a

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verification rate of 30 percent of all students – about 50 percent of all low-income students – has on this improper payment measure. Further, changes over the past several years meant to improve the process seem to have made it worse (Bidwell 2018).

The impact on students like Deja is real. Only 56 percent of Pell-eligible students selected for verification go on to receive a Pell Grant, in comparison to 81 percent

of Pell-eligible students not selected for verification. This represents a 25 percentage-point melt: students who likely were Pell-eligible but were unable to access Pell dollars. It is unknown how many of these students are able to find a way to pay for higher education and still enroll and how many forgo their plans entirely.

FAFSA verification is unintentionally and quietly wreaking havoc on students trying to access financial aid. While some level of review is necessary, the level of burden

unequally placed on low-income students has not been publicly demonstrated to be necessary.

The U.S. Department of Education, with or without Congress, can do a great deal to decrease this burden on students. For example, the Department can allow higher education institutions to accept tax returns instead of tax transcripts when working to verify a student's information. The Department could also eliminate the requirement for non-filers to obtain an IRS letter that simply states they did not file taxes. Information sharing within and across agencies can be increased. And further data on the impact of verification can be released to the public, particularly given the significantly higher rate at which the Department verifies FAFSA filers in comparison to audits of tax filers at the same earnings level.



What Is Verification?

Students apply for federal financial aid, and most state and institutional aid, by completing the Free Application for Federal Student Aid (FAFSA). In order to ensure that the information provided on the FAFSA is accurate, the office of Federal Student Aid (FSA), which is part of the U.S. Department of Education, selects approximately 30 percent of filers to go through a process called verification (McCarthy 2018). This audit-like procedure requires students to take several additional steps in order to receive financial aid from their postsecondary institution.

In detail, verification is the process by which a student's and/or a parent's demographic or financial information submitted on the FAFSA is tested for accuracy through the submission of additional documents (U.S. Department of Education 2017). These additional documents – provided by the students and parents – may include financial documents, such as tax transcripts; birth or death certificates; and/or college enrollment forms from family members. If the additional documents result in a change to the student's information, the student's Title IV aid eligibility, including the expected family contribution that determines their Pell Grant award size, may change. The Department of Education develops verification selection criteria annually in order to target those students who are most likely to submit inaccurate information or students the Department believes are most likely to commit fraud.

How Does Verification Work?

When students submit a FAFSA, their information is sent to the Central Processing Center (CPS) at the Department of Education. From there, the CPS electronically sends the students' information – called the Institutional Student Information Record (ISIR) – to all institutions the students have listed on their financial aid application. Using an annually-adjusted algorithm, students are selected for verification based on ISIR fields. The responsibility of verifying the accuracy of students' submitted information falls to the institutions the students plan to attend. If students are selected for verification, they must provide verification documentation to each of the schools to which they have applied.

Selected students can fall into three verification groups: the Standard Verification Group, the Custom Verification Group, and the Aggregate Verification Group. Students in the Standard Verification Group are asked to verify such items as household size, number of family members in college, or income, if applicable. Tax filers in this group may be asked to verify adjusted gross income, U.S. income taxes paid, or education credits. Students in the Custom Verification Group are asked to provide documentation of high school completion status and a statement of educational purpose and intent. The final group, the Aggregate Verification Group, must verify high school completion status, provide a letter of educational intent, and provide the additional data elements requested of the Standard Verification Group.

Why Is Verification Necessary?

Verification is part of the system the Department uses to prevent improper financial aid payments. An improper payment is “any payment that should not have been made or that was supposed to be made, but was made in an incorrect amount under legally applicable requirements” (U.S. Department of Education 2017). In fiscal year 2017, the Department of Education disbursed \$26.9 billion in Pell Grants to 8.3 million students (U.S. Department of Education Federal Student Aid 2017). The Department reported that 8.2 percent of these outlays, or approximately \$2.2 billion, were improper payments (U.S. Department of Education Office of the Inspector General 2018). For example, a student could receive more Pell Grant dollars (or in some cases less) than what they are actually eligible for because of incorrect information on the FAFSA that resulted in an inaccurate expected family contribution calculation. An improper payment can also include a payment made to an ineligible recipient or a payment made without sufficient documentation.

The Pell and federal direct loan programs are classified as high-priority programs by the Office of Management and Budget (OMB), which means they are subject to additional oversight rules. In comparison to other high-priority programs, the improper payment rate for the Pell Grant program is small (United States Government 2018). In fiscal year 2017, among 17 government programs classified as high-priority, the Pell grant program ranked 12th in terms of the rate of improper payments and 10th in dollar amount of improper payments.

Despite improper payments being a small portion of total outlays, the fiscal year 2017 rate of 8.2 percent is still higher than the 7.85 percent goal (U.S. Department of Education Office of the Inspector General 2018). The Department is concerned with misreported information on the FAFSA as well as fraud in the Pell Grant program. According to the Department, 91 percent of Pell Grant improper payment errors are made by the schools that receive federal money and then distribute it, and 9 percent are made directly by the Department (U.S. Department of Education Office of the Inspector General 2018). Pell Grant overpayments constitute 95 percent of improper payments. Sixty-three percent of those overpayments happen due to administrative or process errors, and only 37 percent are due to failure to verify financial data (U.S. Department of Education 2017).

There is no publicly available data illustrating direct links between the verification process and the improper payment rate. Could the same results be achieved by a better-targeted verification process that would affect fewer students?

Who Is Selected For Verification?

The Department does not release information on verification selection criteria nor does it regularly report the characteristics or outcomes of the students who are selected. While the Department will not release the criteria to preserve the integrity of the process, it also does not release data that demonstrate the process is effective at achieving its goal to reduce improper payments. The Department only releases data showing that it meets its stated goal of verifying approximately 30 percent of FAFSA filers each year. In 2017, for instance, 27 percent of FAFSA filers were selected for verification (Smith 2018).

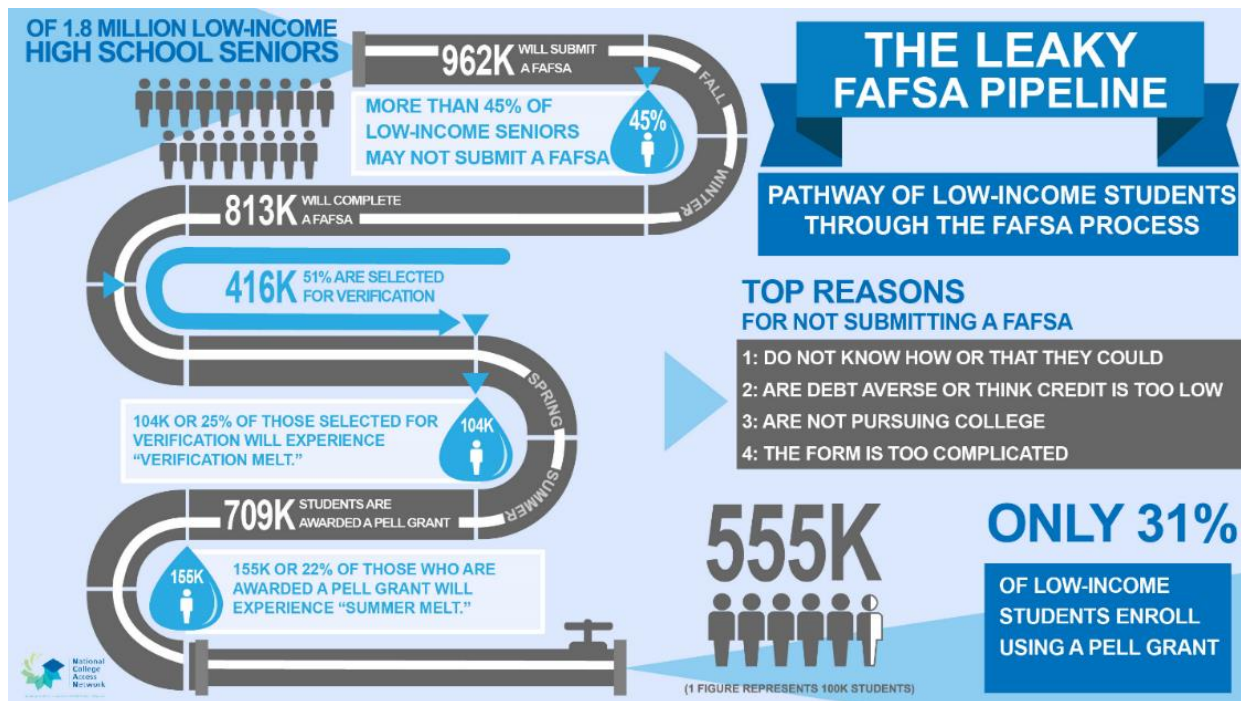
The National Association of Student Financial Aid Administrators has stated that it believes this threshold is higher than necessary (Smith 2018). And compared to the IRS audit rate for tax filers, students filing the FAFSA are selected for verification at a much higher rate (Table 9b, Internal Revenue Service 2017). The IRS audits less than 1 percent of filers with adjusted gross income of \$1 to \$500,000. Even for filers with no earnings, who may be filing to receive refundable tax credits and likely would be eligible for a Pell Grant, the IRS only audits 2.55 percent. The highest IRS audit category is for individuals earning over \$10 million annually, and that rate is still half of the FAFSA verification rate, at 14.5 percent.

For the 2016-17 award year, more than 5.4 million Pell-eligible students were selected for verification, which amounts to 51 percent of the total 10.6 million eligible applicants.

When looking specifically at the students who are Pell Grant-eligible, as presented in the annual Pell Grant report, the percentage of students who are selected for verification is much higher (U.S. Department of Education 2018). For the 2016-17 award year, more than 5.4 million Pell-eligible students were selected for verification, which amounts to 51 percent of the total 10.6 million eligible applicants. The verification rate was its highest in recent memory during the Great Recession, with approximately two-thirds of Pell Grant-eligible students selected.

Applying the percentages from the Pell Grant report mentioned above to the low-income high school seniors depicts a stark trend: The verification melt rate is even higher than the summer melt rate, when students enroll but don't matriculate.¹ Twenty-five percent of Pell-eligible high school seniors who are selected for verification do not go on to receive a Pell Grant (DeBaun 2018). The graphic below illustrates the impact this has on low-income high school seniors' receipt of Pell Grants to pursue higher education.

¹ "Verification melt examines the different rates at which low-income students whose FAFSAs are and are not selected for verification receive a Pell Grant. . . . In the 2016-17 award year, 81 percent of low-income students who completed a FAFSA and were not selected for verification received a Pell Grant, compared to 56 percent of students who were selected for verification." (DeBaun 2018)



In the absence of more complete and current public data, older studies can give additional background into who is selected for verification. In an experimental study – conducted before the use of prior-prior year tax information – which used text message nudges in Texas school districts to encourage FAFSA completion, nearly 40 percent of students who submitted a FAFSA were selected for verification. Among those students who were not economically disadvantaged, 26 percent of white students and 39 percent of nonwhite students were selected for verification. Approximately 42 percent of economically disadvantaged students were selected (Page, Castleman and Meyer 2018).

A report released by Federal Student Aid (FSA) in 2009 (Rhodes and Tuccillo, Analysis of Quality Assurance Program Data: 2008-09 2009) and an analogous report by FSA (Rhodes and Tuccillo 2008) released in 2008 give further insight into the selection process. FSA enlisted institutions participating in the now-defunct Quality Assurance Program to randomly select students for verification. Among the students in the random sample were some who would normally have been selected for verification and some who would not have been selected. The sample contained all types of FAFSA filers, including first-time and renewing filers. The researchers then examined which students were selected for verification by the institution and by the Central Processing System (CPS). Some startling findings from these reports include:

- The CPS selected dependent students at a rate almost 10 percentage points higher than the selection rate for independent students.
- At four-year institutions, between 40 and 43 percent of students were selected by the CPS for verification, while 58 percent of students were selected at community colleges.

- Among students with a zero or negative parent adjusted gross income (AGI), 73 percent of those who were selected for verification saw no major change to their EFC or Pell award, while 11 percent of students with zero or negative AGI's who were selected did experience a major change.
- Forty-six percent of students with AGI's greater than \$75,000 were not selected by CPS but would have had a major change to their financial aid had they been selected.
- Among students with auto zero EFCs, 66 percent were selected by the CPS for verification, and only 7 percent had any major changes to their financial aid awards.
- Almost 95 percent of dependent students who did not file taxes were selected for verification, and 73 percent of independent non-filers were selected.

Both reports demonstrate the same results: As a student's income decreases, his or her chances of being selected for verification increase. From these data alone, it appears that the verification process does imprecisely target low-income students.

More recently, NASFAA asked its institutional members to share the impact of verification on their students. Forty-five public institutions responded to the survey, including 28 four-year schools, 14 two-year schools, and three schools that fall into an "other" category. Among these campuses, on average, 83 percent of the students selected for verification were Pell-eligible. For those students who went through the verification process, 84 percent saw no change to their Expected Family Contribution or saw a change so small as to not affect their Pell eligibility.

At two-year campuses, the impact is even starker: Eighty-nine percent of selected applicants were Pell eligible, and 91 percent did not see a change in their EFC or saw an EFC change that was small enough as to not result in a change to the student's Pell Grant award. Those who did have an EFC change were slightly more likely to receive an increased EFC than those whose EFC went down. However, the small portion of students with an EFC change that impacted their aid award is fairly small. This begs the question of whether verification is targeting errors well or making the desired impact.

Negative Consequences of Verification

The publicly available data on students selected for verification is extremely limited. But by comparing Pell-eligible FAFSA filers who were selected for verification to those not selected for verification, it is possible to determine the melt rate, or the portion of students who do not receive a Pell Grant after appearing to qualify on their FAFSA.

Nayeli's Story

Nayeli Ramas of Austin, Texas, spent weeks trying to complete the verification process. She needed to provide her community college with a tax transcript, so she tried to get an appointment with her local IRS office. But none were available in a reasonable time period, and Nayeli was unable to use the online tax transcript portal. So she drove nearly two hours to the next IRS office to obtain the paperwork.

Unfortunately, after her school processed her paperwork for four weeks – a delay likely caused by the staff-intensive nature of verification and high rate of verification flags at community colleges – Nayeli found out that there was a still a problem with her information. This meant she still could not receive any aid unless she could resolve the issue.

Nayeli is currently taking classes only because she was able to enroll in a payment plan through her school and make an on-time payment. She is now left hoping that her financial aid comes through before too many more payments are due.

For students who appeared to qualify for a Pell Grant after completing a FAFSA who were not selected for verification, 81 percent ultimately received a Pell Grant award. This is compared to only 56 percent of Pell-eligible students who were selected for verification (DeBaun 2018). This results in a 25 percentage-point gap in the melt rate between the two groups. This difference demonstrates that students who are selected for verification are accessing financial aid at a much lower rate.

Another consequence of FAFSA verification is the amount of additional time it takes to process a student's financial aid information. If a student is selected for verification, they must submit documents to verify that their demographic and financial information listed on the FAFSA is correct. For students applying to college for the first time or transferring, they must complete this process for each institution that they listed on their FAFSA. Each school has its own verification process that includes different forms, different required documents, a different way of notifying the student, and a different way of collecting the information. At one school, a student may receive a mailed letter and an email from the school and be able to upload her documents into a portal. But at another school, that student may only receive an email notification via her new school email address and be required to turn everything in person.

This additional step in the financial aid process may delay the processing of students' financial aid information. While some states and institutions may hold the place in line for first-come, first-served financial aid, this is not a guarantee. Further, not knowing their financial aid package may cause students to miss enrollment deadlines since they do not know whether they can afford a particular school.

The introduction of the IRS Data Retrieval Tool and acceptance of prior-prior year tax information, which began for award year 2017-18, were supposed to reduce the number of students selected for verification. These changes should also have resulted in a lower volume of verification-related tasks for financial aid administrators. In the spring of 2017, which was the end of the traditional FAFSA filing time for high school seniors and returning college students, NASFAA conducted a survey of its members and found that there was no change in the volume of verification tasks financial aid administrators had to complete after prior-prior year tax information could be used to file the FAFSA (National Association of Student Financial Aid Administrators 2017). In the following award year, 2018-19, there was a surge in verifications that the Department of Education attributed an algorithm adjustment issue (McCarthy 2018).

Even if the IRS Data Retrieval Tool and prior-prior year tax information could decrease the amount of students selected for verification, not every student can use the Data Retrieval Tool, and not all families are required to file taxes. Families who are required to file taxes may not be able to access the Data Retrieval Tool for a variety reasons. For example, not all filing statuses, such as married filing separately, are eligible to use the tool.

Students who must obtain a tax transcript also face an uphill battle. To use the online request portal, a student must have a cell phone in his name as well as either a credit card, car loan, or mortgage. Many low-income students do not meet this test and must then request their transcript via mail, fax, or in person.

The verification process can be extremely burdensome, especially for low-income families who do not earn enough to be required to file a tax return (Porter 2018). If non-tax-filers are selected for verification, they must provide a W-2 form for each source of their income, a signed statement detailing sources and amount of

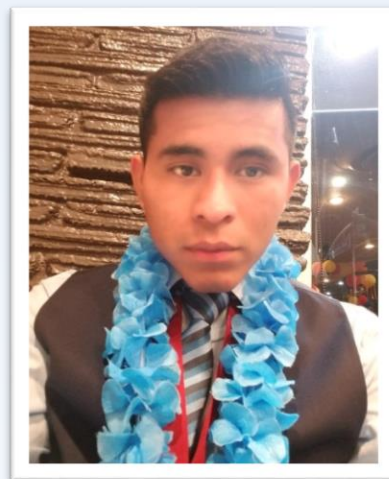
Estuardo's Story

Estuardo graduated from high school in Los Angeles in 2018 after emigrating there by himself from Guatemala in 2013. He hoped to stay in L.A., attend a large public university, and keep his job so that he could support himself and his family back home.

After completing the FAFSA, Estuardo found out he had been flagged for verification. His parents do not live in the U.S., and Estuardo had to jump through several hoops to prove that his parents did not file U.S. taxes.

To obtain the needed documents, Estuardo's sister had to travel into Guatemala City to access the internet, create an email account, and send photos of the signed documents that confirmed his parents' tax-filing status. The delay forced him to commit to the college without a financial aid package (Porter 2018).

Thankfully, Estuardo's story ends well. He received a financial aid package and was able to enroll on time. Unfortunately, that's not the case for the 25 percent of students who experience verification melt.



income from work not listed on a W-2 (which also states that the student or parent is not required to file a tax return), and a Verification of Non-filing Letter from the IRS. Additionally, if students are selected to provide a statement of educational intent, they must appear in person at their institution with a valid ID. If they cannot appear in person, they must pay for a notary public.

Policy Recommendations

The most effective way to decrease the burden of FAFSA verification on students, is to simplify the entire financial aid application process. However, until that happens, there are other policy steps that can be taken. Some require Congress or the more formal negotiated rule-making process, but most of these changes can be made directly by the U.S. Department of Education.

Suggested recommendations for Congress:

- Decrease number of data elements on the FAFSA, thus decreasing the number of items that need to be verified.
- Allow FAFSA filers receiving means-tested benefits to receive an auto zero EFC, and do not select those students for verification, based on their means-tested benefits receipt.
 - Use cross-agency data-sharing to confirm the receipt of the means-tested benefits.
- Amend Internal Revenue Code Section 6103 to allow for direct sharing of data between the Departments of Treasury and Education.
- Legislate any of the recommendations below to force the enactment of the changes.

Suggested recommendations for negotiated rule-making:

- Cap the percentage of students an institution is required to verify information for, even if the Department flags a higher percentage of that school's students for verification. This will prevent the proportion of students at each institution from fluctuating annually and would decrease the burden on both institutions and students.

Suggested recommendations for the U.S. Department of Education:

- Increase the number of data elements on the FAFSA that are automatically transferred from already verified sources. This could include expanding the IRS

Data Retrieval Tool and building data-sharing partnerships with other agencies.

- Allow students to submit a tax return rather than a tax transcript to verify income data. This will reduce the burden on both students and the IRS.
- Reinststate a cap, previously 30 percent, on the percentage of students an institution is required to verify information for, even if the Department flags a higher percentage of that school's students for verification. This would address both student and institutional burden.
- Eliminate the need for non-tax-filers to provide proof of their non-tax-filing status, whether they are the parent of a dependent student or an independent student. Given that the IRS Form 4506-T only produces a response from the IRS that taxes were not filed and does not confirm that they did not need to be filed, the form provides no additional information for financial aid purposes.
- Create an annual verification report that shares the percentage of FAFSA filers flagged for verification, whether they ultimately received federal financial aid dollars, and whether their EFC changed enough to affect their award. This transparency will help prevent verification from becoming a bigger burden in the future and also will demonstrate the amount of impactful errors on FAFSA forms.
- Do not select FAFSA renewal students with zero EFCs for verification in subsequent years if they previously completed verification. Approximately 80 percent of students with zero EFCs have them the following academic year too, and nearly all students who start college with a zero EFC continue to receive Pell throughout college. Given this lack of change in financial status, repeating financial verification is unlikely to provide a reduction in improper payments worth the repeated burden on these students (Kelchen 2015).
- Create a one-stop verification clearinghouse through FSA, rather than requiring students to complete verification at every institution to which they applied, or at the least standardize the notification and resolutions process. Use a third party vendor if needed.
- Improve the language on the Student Aid Report to be more student-friendly. This language should provide specific next steps for students (e.g. tell students to request a tax transcript and provide a link to the IRS website).
- Increase training for institutions about what is required during verification and clarify that they should not go above and beyond those requirements simply for

fear of program review or audit.

- Re-introduce standard verification forms and encourage institutions to use them so students can fill out the form once and then send a copy to each institution.

Suggested recommendations for postsecondary institutions:

- Increase assistance for students through clearer processes, notification in places where students will see it (e.g. personal email versus university email), and cataloguing of permanent documents (e.g. birth and death certificates) to ease the process for repeat verification. However, placing the responsibility of helping students complete verification tasks on institutions cannot be the sole solution to the verification problem, given the time and financial cost colleges and universities would have to bear.
- Follow the guidance provided from the Department of Education regarding what is needed for verification and do not create a burden beyond those requirements. For example, a college should not ask students to file taxes if the IRS does not legally require them to do so.



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