



NASFAA

PRISON EDUCATION PROGRAM

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NASFAA Prison Education Program Learning Series

Verification

Award Years 2023-24 & 2024-25

What is verification? Every year the Department of Education (ED) selects a certain percentage of financial aid applicants for a process known as verification. When an application is selected for verification, the school must request documentation from the applicant confirming the accuracy of the initial information on the Free Application for Federal Student Aid (FAFSA). Although several different areas of the financial aid application can be subject to verification, students who are incarcerated and selected for verification only have two verification requirements: providing proof of identity and signing a Statement of Educational Purpose. They do not need to verify any other FAFSA items unless there is conflicting information related to those items.

Why does verification matter? Students selected for verification cannot receive federal financial aid until they complete the verification process.

How does the verification process work for incarcerated students? After applicants file a FAFSA, both the financial aid office and the students receive a summary of the results of ED's application processing. These summaries indicate whether the application requires verification and the school requests the necessary documentation. Verification requests have verification tracking flags that refer to the type of verification required. For students who are incarcerated, only flags V4 or V5 require verification; other flags do not require verification action. V4 and V5 request proof of identity and completion of the Statement of Educational Purpose, which must both be completed at the same time and in person in front of a designated school official. It is a good practice for the financial aid office to maintain a list of those staff members authorized to verify identity.

- **Verification of Identity (V4):** The student must present a valid unexpired government-issued photo ID to a school official. The individual who accepts the ID must make a copy of it for the student's financial aid file and add the date and their name to the copy. Students who are incarcerated can use their ID issued by the public or privately operated correctional facility, even if those IDs don't have an expiration date. Other acceptable IDs include any valid, unexpired U.S. government-issued or U.S. state photo ID. A military ID cannot be photocopied and therefore cannot be used. One potential complication exists with identity verification. At times, the student's name on the ID issued by the correctional facility may not match the student's name as recorded on the financial aid application and summary documents that are verified with the Social Security Administration (SSA) during FAFSA processing. That discrepancy must be resolved in order to complete verification. Financial aid administrators should work with the correctional authority to resolve this conflicting information and then document how it was resolved.

- **Statement of Educational Purpose (V5):** At the time the student presents their photo ID, they must also sign the Statement of Educational Purpose in person in front of the designated school official. The Statement of Educational Purpose must use the exact wording shown below. The award year shown can be replaced by the appropriate award year if needed (e.g., replacing 2024-25 with 2023-24).

Statement of Educational Purpose

I certify that I _____ am the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending _____ for 2024–2025.

(Print Student's Name)

(Name of Postsecondary Educational Institution)

(Student's Signature)

(Date)

(Student's ID Number)

Note: The student's ID number is optional in the statement if it already appears elsewhere on the same page.

Three Important Caveats

- Verification must be done in person by the student. Video conferencing is not sufficient, and verification cannot be completed by someone who holds a power of attorney for the student.
- The financial aid office must retain the annotated copy of the ID and the original Statement of Educational Purpose with a wet (not copied) signature. Scanned, copied, or emailed statements are not acceptable.
- If an authorized school official is not able to meet with the student in person to complete verification, a notary public can substitute. The notary public can view, copy, and annotate the copy of the ID, and can notarize the student's signature on the Statement of Educational Purpose. The annotated ID copy and the original notarized Statement of Educational Purpose must be sent to the college's financial aid office and retained there. Because ED recognizes that obtaining notarization inside a correctional facility can be challenging, a signed statement from an authorized official at the correctional authority can replace the services of a notary public to verify the student is the person signing the Statement of Educational Purpose. Regardless, the financial aid office must retain the annotated copy of the ID and the original statement.

Frequently Asked Questions

When the Department of Education selects a student for verification, does that mean the student has done something wrong?

Not necessarily. The government selects FAFSA applications for verification based on an unknown algorithm (which may include some random selections) and to check certain error-prone items. Selection for verification doesn't necessarily mean the student has done anything wrong, and incarcerated students only need to verify their ID and the Statement of Educational Purpose.

What if I find conflicting information on the Student Aid Report (SAR) or FAFSA Submission Summary of an incarcerated student?

Conflicting information occurs when some information on the application is inconsistent with information in the financial aid file. This must be resolved regardless of the student's verification status.

Can a school or prison official sign the Statement of Educational Purpose on the student's behalf?

No, the student must sign the statement in front of a school official, notary public or an authorized correctional official at the time they present their ID.

What photo IDs are acceptable for verification?

The student's ID from the correctional facility (private or public) is acceptable even if it doesn't include an expiration date. An unexpired, valid government-issued photo ID is also acceptable. For this purpose, a valid government-issued photo ID is one issued by the U.S. government, any of the 50 states, the District of Columbia, 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. "Unexpired" means not expired at the time the ID is checked even if it will expire later during the award year.

A few examples of acceptable government-issued IDs include a driver's license, non-driver's identification card, state-issued voter ID (even without an expiration date), other state-issued identification, U.S. passport, permanent resident card or resident alien card (I-551), Certificate of Naturalization (even without an expiration date) if the photo is recognizable as the student.

Is there a time limit on verification?

Yes. The school may have an institutional verification deadline, and the school's financial aid office can provide that information. In any case, the school must have all required verification documentation and financial aid processing documents before the earlier of 120 days from the student's last day of attendance, or the final award year processing deadline, which is usually around mid-September following the award year.

For students who are incarcerated, must the school verify income and data elements if the SAR or FAFSA Submission Summary shows a verification flag V4, V5, or V1?

No, incarcerated students selected for verification are only required to verify their identity and sign the Statement of Educational Purpose for verification flag V4 or V5. Incarcerated students with a V1 verification flag, which is called the Standard Verification Group, do not need to complete that verification at all, and students with a V5 flag do not have to verify income or other items in that tracking group.

Must an incarcerated student's spouse or parents complete verification?

No. Because the student is only verifying their identity and the Statement of Educational Purpose, their spouse or parents do not need to be involved in verification.

Does the "Student's ID number" in the Statement of Educational Purpose refer to the student number assigned to them by the school, or is it the number shown on the ID they presented for verification?

In this case, the student should use their college ID number.

This work is generously sponsored by a grant from Ascendium Education Group.

