

**Delgado Community College
Delgado Financial Aid Verification Policy and Procedures
Manual - 2122**

effective: 8/12/2021

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Section 7: File Review and Verification

7.1 Verification

7.1.1 Selection of Applicants to be Verified

Policies

During the 1986-1987 award year, the US Department of Education began the verification selection process to resolve information that is reported incorrectly on the Free Application for Federal Student Aid (FAFSA). Reducing errors in applicant-reported data assists financial aid administrators in ensuring students receive the correct types and amounts of financial assistance.

Delgado Community College verifies 100% of all FAFSAs selected by the Central Processing System (CPS). No additional data elements are requested when verifying FAFSAs selected by the Central Processing System.

Absent conflicting information, the entire application (both student and parent data) may be excluded under the following circumstances:

- Applicants who die during the award year (regardless of conflicting information)
- Applicants who will not receive Title IV aid for reasons other than failure to complete verification
- Applicants who are only eligible to receive unsubsidized Title IV student financial assistance— Direct Unsubsidized Loans, parent, and Iraq and Afghanistan Service Grants (IASGs)
- Transfer students who completed verification at the previous school and the current school obtains a letter from the previous school indicating verification was completed and the ISIR transaction of the verified application
- Applicants who are selected for verification after they are no longer enrolled and all Title IV disbursements have been made (including late disbursements)

Parental data (but not student data) can be excluded from verification in the following circumstances:

- Dependent student's parents when both parents reside outside the United States and cannot be contacted by normal means of communication
- Applicant's parents when both parents cannot be located because their contact information is unknown
- Dependent applicant's parents when both parents are mentally incapacitated

An applicant's spousal information may be excluded when the spouse is deceased, mentally incapacitated, residing in a country other than the United States, and cannot be contacted by normal means, or the spouse's contact information is unknown.

Modification and waiving of some statutory and regulatory provisions applies under the Higher Education Relief Opportunities for Students (HEROES) Act. Eligible applicants include persons:

- Serving on active duty during a war or other military operation or national emergency;
- Performing qualifying National Guard duty during a war or other military operation or national emergency;
- Residing or employed in an area declared a disaster area by any federal, state, or local official in connection with a national emergency; or
- Who have suffered direct economic hardship as a direct result of war, other military operation, or national emergency.

There are times when Delgado may be allowed to waive regulatory provisions when a federally declared disaster affects the offering of aid.

Delgado reserves the right to self-select any additional FAFSAs for Verification or request additional documents if there is conflicting information presented, or in the event, the college has reason to believe the student is attempting to defraud the federal government or the College.

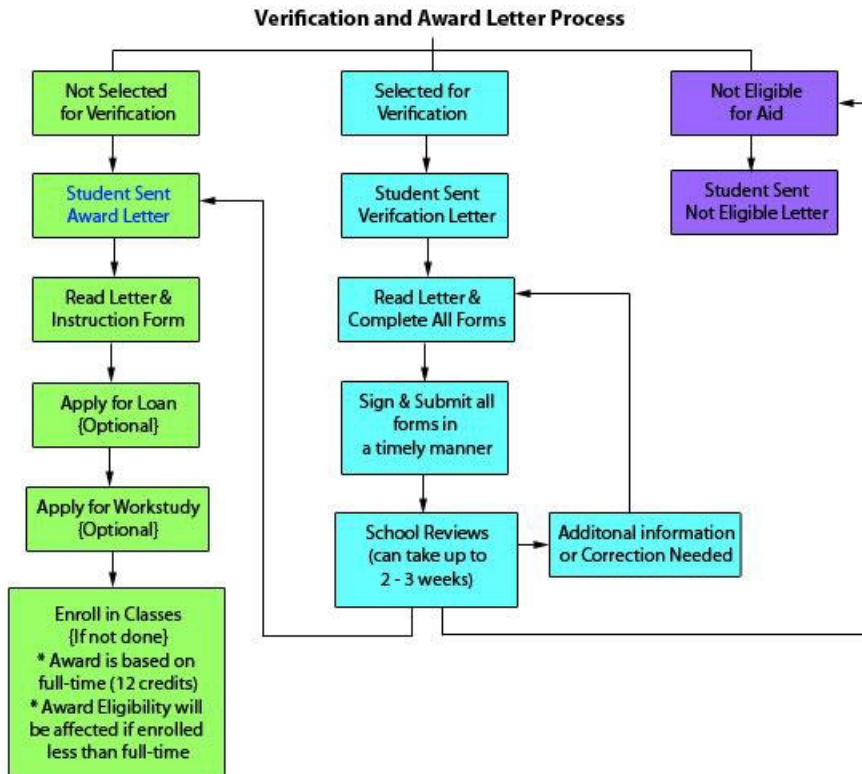
Resources:

668.53
668.54
668.54(a)
668.54(b)
GEN-21-05
668.60(a)
668.60(c)(1)
668.60(b)(2)
[Federal Register, 9/3/20, pp. 55003 to 55007](#)
[Federal Register, 7/14/20, pp. 42365 to 42369](#)
[Federal Register, 9/29/17, pp. 45465 to 45471](#)
GEN-17-08
[Electronic Announcement, 9/25/20](#)
GEN-10-16
[Electronic Announcement, 9/13/17](#)
[2021-22 FSA Handbook, Vol. AVG, Ch. 4](#)

Procedures

FAFSAs are selected for verification by the Central Processing System. FAFSAs that are selected by CPS are loaded into Inceptia's Verification Gateway for processing. Inceptia is responsible for processing all student verification accounts and has a QA process to ensure fair consistent verification processing. Delgado can monitor the student's verification progress through the Verification Gateway. Subsequent ISIR's are monitored by Financial Aid Counselors through internal reports.

Below is the process used by Inceptia.



7.1.2 Acceptable Documentation and Forms

Policies

ED publishes a notice in the *Federal Register* annually which details acceptable documentation for Free Application for Federal Student Aid (FAFSA®) information subject to verification for a given award year. All additional guidance ED publishes through Dear Colleague Letters (GEN) and Electronic Announcements are monitored and implemented as they are released.

Required Documents

All students and parents are required to submit all documentation requested via the verification portal online at www.verification.gateway.org. Students are notified to submit the necessary documents by both Delgado Community College and Inceptia. Prospects, Applicants, and Currently Enrolled Students should monitor LoLA, Delgado's self services system, and all email addresses that are on file with the College. Specific information requests and documents are listed in Inceptia's Gateway and in LoLA. Specific document instructions and information requests are outlined to each student or parent in Inceptia's Gateway or in LoLA. Students are encouraged to use the data retrieval tool to prevent possible conflict whenever possible.

Delgado and Inceptia may request information and documents related to the following data points:

- All taxed and untaxed income and assesses
- Household Size
- High School Completion
- Identity/educational purpose Statements

Additional document information for students and parents can be found at

Resources:

668.53(a),(b)

Resources:

668.53(a)
668.53(b)
668.56
668.57
GEN-21-05
668.60(c)(1)
Electronic Announcement,
8/21/20
Federal Register. 12/11/20, pp.
79857, 79861
Federal Register, 9/3/20, pp.
55003 to 55007
Federal Register,
7/14/20,11/1/19, pp. 42365 to
42369
GEN-01-06
Electronic Announcement,
1/15/21 (OPE Announcements-
21-05)
Electronic Announcement,
9/25/20
Electronic Announcement,

Paper versions of all documents can be obtained by visiting the Financial Aid Office.



Due to the COVID-19 national emergency, schools have been granted flexibility in acceptable documentation for verification, such as the suspension of in-person submission and notary requirements for those in the V4 and V5 verification groups, and other flexibility. At the time of this publication, these flexibility are available through the end of the payment period that begins after the COVID-19 national emergency, is rescinded.

Document Submission Timeline

Verification for Pell-eligible students must be completed no later than 90 days after student's last date of attendance at DCC or the published Final Document Deadline, of the applicable award year, whichever is earlier. All document deadlines are published in the corresponding student Handbook. Your aid will not be processed if verification is not completed. Once all requests for information or documents has been met it can take up to 15 days for Inceptia to process all necessary corrections and complete verification.

If verification is not completed timely, the student may be responsible for securing courses with a payment plan

- Documents not submitted timely could result in:
- Student paying for fees out of pocket
- Financial aid award cannot be processed
- Student incurs an outstanding balance at the end of the semester
- Outstanding balance will prohibit enrollment in a future semester
- Inability to receive transcripts

Online Forms and Signature Security

Inceptia/NSLP is a **TECH LOCK® Certified: Service Provider**. Tech Lock Incorporated, a nationally recognized data security and regulatory compliance firm, has awarded its certification to NSLP for compliance with FIPS 200 (*Minimum Security Requirements for Federal Information and Information Systems*) and FISMA NIST SP800-53 rev 4 (*Recommended Security Controls for Federal Information Systems*).

Inceptia has developed a multi-tiered secure network segment for the processing and handling of Personally Identifiable Information (PII) and maintains the network and systems in compliance with the constantly evolving FISMA network.

Inceptia's internal network resides behind redundant, fault-tolerant firewall architecture with telecommunications services. The network employs intrusion detection and prevention systems, continuous vulnerability scanning, and monitoring systems that alert anomalies to our operations staff in real time. Annual internal and external third-party audits are conducted to assure continued control compliance.

Data transmitted to the Inceptia systems by our clients is encrypted during transmission using 104-2 compliant encryption technology. Data transferred to the Inceptia servers is processed using industry recognized best practices for data security and integrity.

Procedures

Inceptia manages all verification document assignment, collection, and tracking procedures.

7/9/20

Electronic Announcement,
2/23/17

2021-22 FSA Handbook, Vol.
AVG, Ch. 4

2020-21 FSA Handbook, Vol. 2,
Ch. 7

Resources:

GEN-01-06
2020-21 FSA Handbook, Vol. 2,
Ch. 7
Program Integrity Q&A,
Verification, DOC-Q12/DOC-
A12

7.1.3 Data Elements to be Verified

Policies

Delgado Community College does not add any additional requirements to the verification process and abides by guidance put forth in in [Electronic Announcement, 9/25/20](#). The individual FAFSA items from the 2021–2022 *Federal Register* notice that an applicant must verify are based upon the Verification Tracking Group to which the applicant is assigned as outlined in the following chart.

2021–2022 Verification Tracking Groups
FAFSA Information Required to be Verified

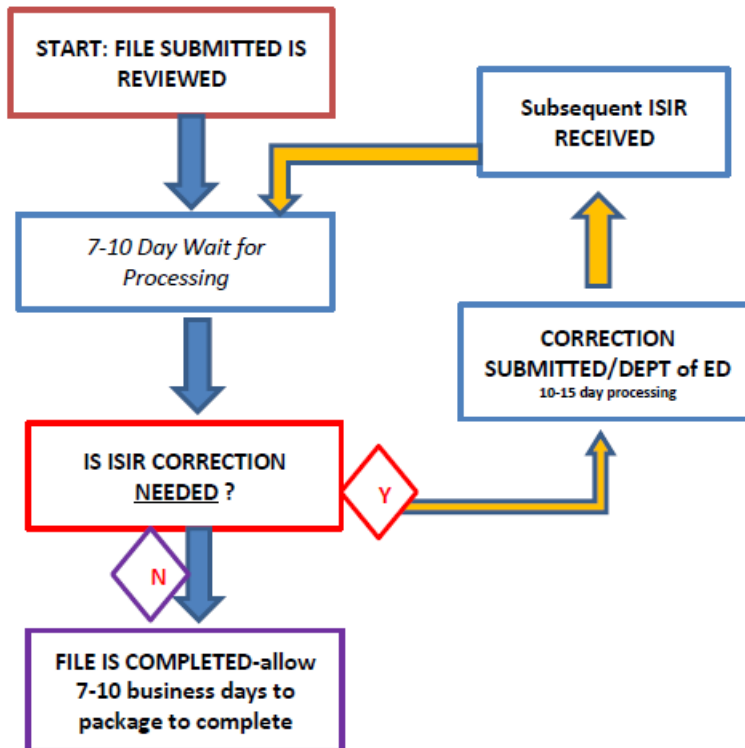
Resources:

668.59(a)
668.56
GEN-21-05
[Electronic Announcement, 6/11/21](#)
[Electronic Announcement, 9/25/20](#)
2021-22 FSA Handbook, Vol. AVG, Ch. 4

Verification Tracking Flag	Verification Tracking Group Name	FAFSA Information Required to be Verified
V1	Standard Verification Group	<u>Tax Filers</u> <ul style="list-style-type: none"> • Adjusted Gross Income • U.S. Income Tax Paid • Untaxed Portions of IRA Distributions and Pensions • IRA Deductions and Payments • Tax Exempt Interest Income • Education Tax Credits <u>Nontax Filers</u> <ul style="list-style-type: none"> • Income Earned from Work <u>Tax Filers and NonTax Filers</u> <ul style="list-style-type: none"> • Number of Household Members • Number in College
V2	Reserved	N/A
V3	Reserved	N/A
V4	Custom Verification Group	<ul style="list-style-type: none"> • High School Completion Status • Identity/Statement of Educational Purpose
V5	Aggregate Verification Group	<u>Tax Filers</u> <ul style="list-style-type: none"> • Adjusted Gross Income • U.S. Income Tax Paid • Untaxed Portions of IRA Distributions and Pensions • IRA Deductions and Payments • Tax Exempt Interest Income • Education Tax Credits <u>Nontax Filers</u> <ul style="list-style-type: none"> • Income Earned from Work <u>Tax Filers and NonTax Filers</u> <ul style="list-style-type: none"> • Number of Household Members • Number in College • High School Completion Status • Identity/Statement of Educational Purpose
V6	Reserved	N/A

Correction process

The chart below outlines the treatment of corrections made by Inceptia for verification.



Delgado Community College and Inceptia have fully implemented the guidance in accordance with DCL ID, GEN-21-05 as of August 2, 2021. neither entity is requesting documents related to household size or income verification unless this information is needed to resolve conflicting information.

Procedures

Inceptia manages all the verification processes including reviewing files for quality control. Inceptia is also responsible for reporting all verification results for students who are selected to verify identity and high school, or equivalent, completion using the FAA Access to CPS Online. Once Inceptia completes the verification process, they will mark the account verified. At that time, the Inceptia data is bridged over to Banner this occurs at approximately 3 pm each day. A student receives a Satisfied status on Tracking only after Inceptia has marked the student's case as verified and Delgado Community College receives the corrected and locked ISIR verified by Inceptia from CPS. Once a student's tracking status has been updated with an S for Satisfied. The student's verification status is also updated on the Verification tab on ROASTAT and the student continues to be process based on Delgado's Packaging Policy.

Effective July 13, 2021, Delgado will continue processing accounts suspended by Inceptia and coded as selected, not verified in accordance with the Verification waiver guidance offered in GEN-21-05. The following modifications have been made to our verification processing to allow for Inceptia to "Suspend" verification accounts once they are reviewed for conflicting information.

Once Inceptia reviews the file and determines that it is eligible for the verification waiver and that there is no conflicting information, they will mark the account suspended. At that time, the Inceptia data is bridged over to Banner this occurs at approximately 3 pm each day. Once a student's tracking status has been updated with a 1 for Suspended. The student will be placed into the tracking group DEPVER/INDVER. At that time, the student's verification status is also updated on the Verification tab on ROASTAT to reflect S=Selected not verified. From there the student continues to be process based on Delgado's Packaging Policy.

Resources:

Federal Register, 9/3/20, pp. 55033 to 55007
 Federal Register, 7/14/20, pp. 42365 to 42369
 GEN-21-05
 Electronic Announcement, 9/25/20
 Electronic Announcement, 11/18/16
 Electronic Announcement, 6/18/14
 2021-22 FSA Handbook, Vol. AVG, Ch. 4

7.1.4 Conflicting and Inaccurate Information

Policies

Conflicting Information

Conflicting information is any discrepancy between the student's financial aid application and all other information available to the school that materially affects eligibility for financial aid or the amount of aid. The school must review all information in its possession for such discrepancies, regardless of which office or division of the school collects that information. The regulations in 34 CFR 668.16(b)(3) and 668.16(f) require other offices to share relevant information with the financial aid office.

Information that must be reviewed includes information submitted on a sibling's financial aid application (subject to the limitations of FERPA), information submitted in conjunction with a request for a professional judgment review, and oral or written statements made by the student or parent.

Thus the school must review all income tax returns in its possession for conflicting information, regardless of whether they were collected for verification or for other reasons. This includes both state and federal income tax returns. All suspected instances of conflicting information must be brought to the Assistant Director of Financial Aid before the additional document can be requested from any student or parent. The Assistant Director of Financial Aid in consultation with the Director of Enrollment Management will determine if a full verification of a student's file may be required.

Commonly Occurring Conflicting Information Situations which may require V4 verification

Delgado selected any student that is suspected of providing fraudulent information to the college or states they graduated from an unaccredited high school for V4 Verification. These can be but are not limited to be identified through various internal reports.

Abuse, and Fraud

The Financial Aid Office at Delgado Community College will report all instances to the U.S. Department of Education's Office of Inspector General of suspected fraud where an applicant, employee, or other individual has altered documentation and/or misreported for the purpose of fraudulently obtaining federal funds or increasing aid eligibility in accordance with [Delgado's fraud policy](#).

Procedures

Conflicting Information Procedures

1. Report any conflicting or unusual information to the Assistant Director of Financial Aid.
2. If the conflicting information can be rectified with outreach, counselors should begin outreach and record their findings. If the conflicting information can be resolved and appears to be a miscommunication or misunderstanding, take the time to educate the person on the federal or state standard or process.
 1. In the case that the counselor discovers that the student is no longer eligible for financial aid, an AY hold should be placed on the student's account with a description of what is causing them to not be eligible this aid year or future aid years. Some examples include Non-citizen, Non-high school graduate.
 2. All funds should be returned until conflict is resolved.
 3. AY holds can be released once the proper documentation is received.
3. Supervisors may refer the case to Judicial Affairs or seek additional guidance from the LCTCS auditors if they are unsure if the conflicting information was provided maliciously.

Resources:

668.16(f)
668.16(g)(1)
2021-22 FSA Handbook, Vol. AVG, Ch. 5
668.54(a)(2)
GEN-21-05
GEN-11-17
Electronic Announcement, 8/21/20
Electronic Announcement, 8/7/17
2020-21 FSA Handbook, Vol. 2, Ch. 3

Resources:

668.53(a)(5)

7.1.5 Student Notification of Verification Changes

Policies

Inceptia provides all notices to students that as a result of verification the applicant's expected family contribution (EFC) changes and results in a change in his or her Title IV grant, campus-based, or loan amounts. Inceptia completes all corrections related to verification. If a student is required to make a correction to a data element that is not part of verification they are notified through LoLA, Delgado's student's self-service system. They are also notified through email that outstanding

Resources:

668.53(a)(3)
668.53(a)(4)

financial aid requirements are needed via email. All email notifications are sent to the recipient's preferred email address. In the instance that a preferred email address is not available, emails are sent to the email address provided on the FAFSA application.

Procedures

Refer to the Financial aid offer/package notification section of this manual

7.1.6 Interim Disbursements

Policies

Delgado does not provide students with interim disbursements.

Resources:

[668.58](#)

[668.61](#)

[2021-22 FSA Handbook, Vol. AVG, Ch. 4, July 2021](#)