

BO1. Verification and Conflicting Information: Basics and Beyond

Question:

If a student has cc 299 that they were selected for verification, then in subsequent transaction that cc was removed, are we to still complete the V4 flag that is still on the ISIR?

Response:

[SME Brown] Yes, the student is still considered selected for verification, even if the code falls off.

Question:

If a student manually enters they did not file taxes but FTI shows they filed, can the student manually update the tax information on their own? If they're not selected for verification and correct the manually entered info, will this suffice? Or does the school still have to collect documentation?

Response:

{SME: Hagins} When resolving the conflicting information, a school must confirm the student's or contributor's tax information by requesting documentation from the student or applicable contributor. Appropriate documents to collect include either IRS tax transcripts or signed copies of the appropriate income tax return and applicable schedules. The school must use the collected documentation to correct the conflicting financial information and submit it as a correction to the FPS. Schools must update all the manual entry data fields associated with financial and tax information (e.g., tax filing status, AGI, foreign income exclusion, and earned income credit). While the action is not a professional judgment (PJ), the school must also set the PJ flag to force the FPS to use the manually entered financial and tax information in the SAI calculation. See GEN-24-17 for additional information.

Response:

A prior Q&A listed in this thread states differently. It was notated by "SME Hall Lewis"- "If the student was able to successfully make a correction and you see that the SAI calculation is using appropriate data, you do not need to take further action unless you have reason to believe there's conflicting information". I have seen students manually correct the information and the SAI recalculated. Will we still need to take the extra steps and obtain documentation even if the student is not selected for verification?

Response:

{SME: Hagins} If the student can make the corrections and there is no conflicting data between the FTI and what the data the student entered, and the student is not selected for verification, then the school does not need to request documentation. But if the data does not match, or the student is selected for verification, documentation is required.

Question:

Is there a typo on slide 22 of the Verification and Conflicting Information Basics and Beyond? The presenter said 2023 but the slide says 2022 under Victims of IRS Tax-Related Identity Theft 2025-26 Requirements.

Response:

[SME Brown] Yes, there is a typo on slide 22. It should say 2023 for 2025-26. We've updated the slide deck that will be posted to the event platform.

Question:

If an incarcerated student does give permission on FTI and it comes back all zeroes, do we need to get a copy of their 2022 taxes. On one of the slides it says the only thing we have to verify for incarcerated students is identity statement of education purpose. Does that mean we do not need to collect tax returns?

Response:

{SME Hall Lewis} If an applicant provides consent and approval and the FA-DDX returns information, you may consider the information transferred via the DDX to be verified. Further, incarcerated applicants are only required to verify identity and statement of educational purpose.

Question:

The FAFSA does not make it clear to families that they should only answer "yes" to receipt of free or reduced lunch if they meet the USDA criteria. Some families are still answering yes even though they must have received based on attending a low income school. If we see based on their income that the family was not eligible but answered yes based on attending a low income school, is that conflicting information?

Response:

{SME: Hagins} Yes. Since some states and/or cities offer free or reduced lunches to all students, if you are aware that a family would not be eligible based on the USDA criteria, then you should consider it conflicting information

Question:

Does conflicting information need to be resolved if the conflicting information does not change the student's SAI or otherwise affect the student's eligibility for Title IV aid?

Response:

[SME Brown] Generally, it is best practice to correct any conflicting information or errors in a student's application. But you are not required to change information if it does not affect a student's Title IV eligibility.

Question:

If a school collects legal name and informal names on their admission and the FAFSA comes in and matches a name listed as "informal" rather than "legal". The student explains that they listed their preferred name on the first line (Legal name) since they wanted to be listed on class lists with that name. Is this conflicting information?

Response:

[SME Brown] If the student's name on the FAFSA form went through the Social Security Administration (SSA) data match and there were no issues, and you've confirmed the student's identity (that both names apply to the student and the student is who they say they are) then this is not considered conflicting information.

Question:

Does the Dept. of Ed have anything that shows which 2023 Puerto Rican tax lines that correspond most closely to those on the IRS 1040 tax return that are used to complete the 2025-26 FAFSA as well as verification?

Response:

{SME Hall Lewis} The Department does not have such a resource. You may rely on the tax filer to translate a return for you.

Question:

If a student wrote "no" to filed and had FTI. The student then corrected to "Yes" and entered all their data. Must we make an additional correction to set the PJ flag if we see that the SAI is using the income information from the FTI/correction?

Response:

{SME Hall Lewis} If the student was able to successfully make a correction and you see that the SAI calculation is using the appropriate data (either manually entered or FTI from the FA-DDX), you do not need to take further action unless you have reason to believe there is conflicting information.

Question:

If we are separating out income for a divorced student, are we using the tax table for MFS or single (if no children), or HOH (if children)?

Response:

{SME Hall Lewis} You should use the tax table appropriate to the student's tax filing status.

Response:

If the student was married at the time and is now divorced. What status are we using?

Response:

Your question requires more time to research than allotted for today's Q&A session. Please submit your question to our Customer Support in the FSA Partner Connect Help Center: <https://fsapartners.ed.gov/help-center/contact-customer-support>. Select "Policy Guidance" from the drop-down menu under Topics.

Question:

Is there a "tolerance" for submitting corrections of differences noted during verification and/or resolution of conflicting information or must a school submit even very minor corrections that won't impact the SAI? What about non-dollar items, is that different?

Response:

SME-Bartnicki - For verification purposes, any changes to nondollar items must be submitted and any single dollar item of \$25 or more, (note if you have one dollar item below \$25 and one item above, you would have to submit corrections for both dollar items) - 34 CFR 668.59(a). This tolerance is specific to verification.

Question:

Can you explain what schools should do when FA-DDX successfully transfers IRS data, but a contributor submits a tax transcript or return that shows a different amount for taxes paid? Do we need to submit an ISIR correction to update the amount to match the tax transcript or return?

Response:

SME-Bartnicki - FTI data returned by the IRS is considered verified and supersedes information on a tax return presented by the applicant/family. However, if the tax information provided is due to an amended return, the school would need to update the tax information since the FA-DDX only provides original tax information, not amended tax data.

Question:

If a student is not selected by ED, but we choose to have them verify an item from their FAFSA that is subject to ED verification. For example, we want to have the student verify foreign earned income. Can we just take a written/signed statement or must we ask the student to provide documentation outlined in the Federal Register?

Response:

{SME: Hagins} If you are selecting them for verification, it is up to you what documentation you choose to request.

Response:

For verifying a foreign income exclusion, we get a signed tax return.

Response:

Yes, that's fine.

Question:

Temporary Custody (court documentation) vs Legal guardianship (court documentation) would we treat them the same?

Response:

SME-Bartnicki - No. Custody and guardianship are distinct and separate legal determinations. The HEA specifically refers to guardianship.

Question:

i can't believe i'm asking this! whats the message class for the ahsi file?

Response:

[https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-07-09/nslds-post-screening-additional-identity-verification-2024-25-cycle-updated-july-16-2024#:~:text=\(-,GENERAL%2D24%2D84,-\)%20NSLDS%20Post%2Dscreening](https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-07-09/nslds-post-screening-additional-identity-verification-2024-25-cycle-updated-july-16-2024#:~:text=(-,GENERAL%2D24%2D84,-)%20NSLDS%20Post%2Dscreening)

Response:

this link is not active. nor am i able to copy it.

Response:

{SME: Hagins} AHSI25OP is the file name. Information can be found in EA GENERAL-24-84

Question:

If during verification it is found that the parent listed "Separated" but they were "Married" at the time the FAFSA was completed, do you complete the Verification as "Married" before performing the PJ to "Separated" as is already stated on the FAFSA?

Response:

{SME: Hagins} If they are in fact separated at the time of verification, you would complete verification as though they are "separated". For more information:

<https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2024-2025/application-and-verification-guide/ch4-verification-updates-and-corrections#:~:text=has%20not%20changed.-,Updating%20information,-At%20your%20discretion>

Response:

Note that you may not be able to copy the link. It is the FSA Handbook 24-25, AVG, Chapter 4 Updating Information.

Question:

can a student sign a form confirming what data is correct when the school has conflicting information (example, different spellings of a first name) or must the school collect backup documentation (example, a Social Security card).

Response:

{SME: Hagins} Conflicting Information must always be documented.

Question:

If a student indicates they are homeless/at risk of homelessness, and they have also answered yes to another of the dependency status questions (have a dependent, are a veteran, orphaned, etc), are we required to verify their homeless status?

Response:

{SME: Hagins} If the student qualifies as an Independent student, then verification of their homelessness/at risk of homelessness status is not required.

Response:

Is there a reference/guidance for that, for my colleagues?

Response:

{SME: Hagins} It isn't stated anywhere, but since only one instance is required, and there may be more than one (Married, has a dependent child, and homelessness/at risk of homelessness, etc.), if they qualify under one that does not require proof, then verify that status is not necessary.

Question:

does it ever really happen that someone is selected for v1 or v5 if ddx worked?

Response:

[SME Brown] Yes, it is possible for someone to get selected for both V1 and V5. Remember that both V1 and V5 include information that is not related to tax and income information we receive through the FA-DDX, including Family Size, Identity, and Statement of Educational Purpose. Also, if we receive income and tax information through the FA-DDX, it is considered to be verified.

Question:

Is the DD214 Certificate of Uniformed Services a valid DD214 for clearing the veteran c-code?

Response:

{SME: Hagins} As long as the DD214 classifies the character of service as anything but "dishonorable," the student will be considered a veteran for FSA purposes.

Response:

ED regulations specifically mention the DD214 Certificate of Release or Discharge from Active Duty, but we have been receiving the DD214 Certificate of Uniformed Services. Even though the Certificate of Uniformed Services isn't mentioned by name, we can still use it as long as service is not dishonorable?

Response:

Yes. You can use that form.

Question:

why can't you have on page one of the isir that the student is selected for verification and what type? especially when selected on subsequent isir ? and can't you put back v1, etc instead of standard, etc.?

Response:

[SME Brown] Thank you for your feedback.

Question:

Can you clarify what action schools need to take when an ISIR shows comment code 283 because a parent indicated "No" to filing a 2022 IRS 1040 and selected the option "did not and will not file a U.S. tax return for reasons other than low income"? If the parent provides a signed statement indicating they did not earn any income in 2022, do we need to submit an ISIR correction to change the option "did not file a U.S. tax return for reasons other than low income" to "did not and will not file any tax return because they did not earn any income"?

Response:

SME Hall Lewis: If the documentation you collect indicates that the response on the FAFSA is incorrect, you should correct it.

Response:

If the parents' legal residence is FC, we are unable to correct the "reasons other than low income" question. Please review this and let us know if there is a workaround.

Response:

Your question requires more time to research than allotted for today's Q&A session. Please submit your question to our Customer Support in the FSA Partner Connect Help Center: <https://fsapartners.ed.gov/help-center/contact-customer-support>. Select "Policy Guidance" from the drop-down menu under Topics.

Question:

Is there a way to get a transcript of the Q&A for the sessions?

Response:

[SME-Brown] Yes, a copy of the Q&A transcript will be posted to the event platform.

Question:

For 2025-2026 if the student or any contributor indicates that they did not file a tax form, but IRS data is pulled from the IRS, is this still considered a conflict that must be resolved? If yes, would it be possible to take that question away or skip it if IRS data is found for the student or any contributor?

Response:

[SME Brown] Yes, this is considered conflicting information because the existence of data from the IRS indicates that the individual is a tax filer. See slide 26 from the presentation and EA GENERAL-24-71 for additional information.

Response:

You had referred to 25-26 in your question but this also applies to the 24-25 year.

Response:

According to GENERAL-24-116 FTI + Manual are to be re-processed. Is this still correct and is there a timeline for this?

Response:

Yes, they will be reprocessed. Stand by for future information on the timeline.

Question:

If a parent or student uses the FA-DDX and has a successful transfer from the IRS, but later also submits a tax transcript or tax return, is our institution required to review the tax document?

Response:

SME - Hall Lewis - The FA-DDX should be the primary source of tax information. You would only need to review a transcript or tax return if there was an amendment to the original return.

Question:

If a student is selected for V4 after receiving aid and student fails to provide identity documentation so we need to return aid received, are we required to return only aid for the current award year? Or, since confirmation of identity relates to a student's overall eligibility, are we required to return aid for prior award years as well?

Response:

SME-Bartnicki - You are only required to return aid for the current award year (verification is award year specific). Because the student did not provide any documentation, no further action has to be taken with prior years. However, if the student brought in documentation that conflicts with existing data, conflicting information would have to be resolved or aid could be impacted in prior years.

Question:

Do the AHSI files still require review or is it safe to assume that we will get an updated ISIR with V4/V5 selection?

Response:

{SME: Hagins} Yes, please continue to review AHSI files.

Question:

While discussing the additional verification files, the presenter said "schools may use this file". I thought that this was a must and not a may and the we were required to use the AHSI file to complete the additional verification for any selected student. is this actually a "may" and not a "must"?

Response:

{SME: Hagins} You are correct. You need to use the AHSI file to determine which students you need to verify.

Question:

Why is the Department still sending AHSI files instead of simply selecting subsequent transactions for Verification if needed?

Response:

[SME-Bartnicki] - Due to system delays, FPS is currently unable to select certain applicants for V4/V5. We are working on updating the system and once finalized, we will inform the higher ed community as noted under EA General-24-84.

Question:

Is there an ETA on when the FPP marital status issue will be fixed? Neither the parent nor the school are able to process the FAFSA for Separated, Divorced or Widowed statuses. This is for both Verification and PJ processing.

Response:

This is in reference to going from Married to Separated, Divorced or Widowed. The marital status cannot be updated.

Response:

Your question requires more time to research than allotted for today's Q&A session. Please submit your question to our Customer Support in the FSA Partner Connect Help Center: <https://fsapartners.ed.gov/help-center/contact-customer-support>. Select "Policy Guidance" from the drop-down menu under Topics.

Question:

Are tribal ID cards eligible to be used for verification?

Response:

{SME: Hagins} Yes, tribal ID cards are acceptable.

Question:

How do we determine the reason for an uncalculated SAI when there is an unclear C Flag?

Response:

(SME-Bartnicki) - if you are unsure how to resolve a C flag, after reviewing the FAFSA specifications guide, please reach out to FPS (800-330-5947) who can review the transaction in question and provide assistance

Response:

excuse me! it's impossible to get through to them.

Question:

Is there an ETA when V4 reporting will be available?

Response:

[SME Brown] The Department will announce when Verification Reporting functionality is available in FPP.

Question:

When does the Department plan to start sending post screen ISIRs?

Response:

{SME: Hagins} The Department will announce when this function is available.

Question:

Will the students listed as V4/V5 in the ASHI files ever receive updated ISIRs with their actual tracking group?

Response:

[SME Brown] Please stand by for future guidance on this.

Question:

is a minor difference in the spelling of a student's name between the Admission application and FAFSA considered conflicting information?

Response:

[SME: Brown] Yes, this would be an example of conflicting information because two offices have different information about a student. You want to make sure the student is who they say they are, which would affect their Title IV eligibility.

Response:

Even if it is still clear who the student is- for example Harry vs. Hary?

Response:

[SME Brown] It is always best practice to confirm that a student's name is correct, but if the Department has the correct name from the student's ISIR, and if there are no issues with the Social Security Administration (SSA) data match, then your school does not have to correct the student's name.

Question:

Without revealing detailed methodology, can you provide some insight into student selection for verification, especially for V4 (identity)? If we confirmed student identity (and reported verification results to ED) for a student in one year, why is the same student repeatedly selected for V4 year-over-year?

Response:

(SME - Bartnicki) - For a variety of reasons ED does not provide specific information regarding how students are selected for identity issues. Students can be selected in multiple years because concerns and information can change from year to year. With that said ED is currently reviewing our identity selection process to see if there are situations where adjustments could be made in the process for students being selected over multiple years. We thank you for your feedback and strive to continuously improve our verification process to reduce burden while protecting our programs.

Question:

Thank you for your questions. We will do our best to answer all of them in the order that they appear. If your question is in reference to something from a specific slide from the presentation, please include the slide number in your question.

Question:

The FSA Handbook states, "If your school has conflicting information for a student or you have any reason to believe the student's application is incorrect, you must resolve such discrepancies before disbursing Title IV funds." Could you clarify if we must correct application data due to conflicting information if it does not impact a student's Title IV eligibility? For example, if the manually entered marital status or tax filing status is incorrect, but it does not impact the student's Title IV eligibility, must the corrections be made to the student's FAFSA?

Response:

[SME: Brown] Generally, it is best practice to correct any conflicting information or errors in a student's application. But you are not required to change information if it does not affect a student's Title IV eligibility.

Question:

Does ED intend to still reprocess the 24-25 ISIRs for students who answered "no" to filing a tax return but had FTI data reported on the ISIR?

Response:

SME Hall Lewis: We posted the following in GENERAL-24-71: "The FAFSA Processing System [FPS] does not use the FTI in the SAI and Pell eligibility calculations for students that incorrectly indicated "did not file" when FTI is transferred. If this occurs and the data indicates that the person is a U.S. tax filer, but the appropriate FTI was not used in the SAI calculation, schools should consider these cases as conflicting information that must be resolved." ED will not be reprocessing these files as they require a correction.

Response:

In GENERAL-24-116 released on 9/27/24 (after the last update on GENERAL-24-71), it stated that once a permanent fix is implemented and records are reprocessed, schools will no longer need to request supporting documentation. Is ED now stating that a permanent fix will not be implemented? It even discusses what schools should do while waiting on the fix. Should schools now assume that no records will be reprocessed?

Response:

Yes, they will be reprocessed. Stand by for future information on the timeline.

Question:

Regarding dependency status overrides such as homelessness and independent status appeals, are the overrides given in 24-25 carrying forward to the 2025-26 FAFSA and ISIR? If so, do schools need to confirm the status again? Thank you!

Response:

(SME - Bartnicki) - the data will not carry forward to 2025-26 however, if nothing has changed and you have no conflicting information you will not need to confirm the status again (you can rely on information previously submitted)

Question:

Can you clarify what action schools need to take when a student who has not had their homeless status verified by the school clicks the button that says their FAA status was approved by the school? Do we still need to meet with the student and determine their situation?

Response:

SME: Hall Lewis - If your school has not completed a homeless youth determination for a student, you are required to evaluate the student's situation and make a determination, which may include meeting with the student. You may also consider documentation from an FAA at another institution to be sufficient.