

# 2025-26 CIM Verification Policy

Each year the U.S. Department of Education requires schools participating in the distribution of federal student aid to verify the consistency and accuracy of data submitted on the Free Application for Federal Student Aid (FAFSA). This verification process involves the review of tax documents and household information to ensure the accuracy of the FAFSA application. To complete verification, students, spouses, and parents, as applicable, are asked to submit federal tax documents and forms to the CIM Financial Aid Office.

If selected for Verification, any federal student aid that may be offered is tentative and subject to change until the Verification process is complete, which may include corrections to FAFSA data, which may subsequently require adjustments to the federal aid offered. No federal aid may be disbursed to a student if Verification documents are not complete and until any necessary FAFSA corrections have been processed.

#### **IMPORTANT REMINDERS:**

Only submit Verification Forms and/or send tax returns/W-2's, 1099's etc. to CIM if you have been selected for Verification and you have been notified by the CIM Financial Aid Office to do so. If this is required, the student will see the applicable Verification Worksheet listed on their Populi Financial Aid screen.

A detailed email will be sent from the CIM Financial Aid Office to all who must complete this process to clarify what form(s) are needed for the student file by April 10, 2025 or within 2 weeks of the FAFSA receipt date, whichever comes later. This communication will include the link to the specific verification form needed based on the student's FAFSA.

# 2025-26 Verification Forms

Only submit the form(s) requested of you by the CIM Financial Aid Office (we will provide the applicable form), which may include:

- 2025-2026 Dependent Verification Form (Standard V1)
- 2025-2026 Independent Verification Form (Standard V1)
- 2025-2026 Identity and Statement of Educational Purpose Form (Custom V4)

Note: Students selected for the Aggregate V5 review must complete both the applicable Standard V1 form AND the Custom V4 form

# Who is selected

Any student who completes a FAFSA may be chosen for verification by the Department of Education (Federal Verification). Schools may additionally select any FAFSA for verification at their discretion.



Any student requesting a FAFSA Special Circumstance Professional Judgment Review is required to complete the Verification process before any potential Professional Judgment FAFSA changes may be considered by the CIM Financial Aid Office, per the appeal, *if* the student had already been selected for the Verification process.

Students selected for Verification will find the Verification Worksheet Dependent, or Verification Worksheet Independent, and/or Identity and Statement of Educational Purpose listed on their 2025-2026 Populi Financial Aid tab and will be emailed by April 1 or 14 days from CIM's FAFSA receipt, whichever is later. Dependent students need to have a parent complete the parent section of the form and submit applicable income/tax documents. Independent students only submit information about themselves, and their spouse, if married.

For Federal Student Aid purposes, information about dependent vs independent status is found <u>here</u>. Please understand this is **not** the same definition as dependency status for tax purposes.

Submit requested documents in person, by uploading securely via the student Populi Financial Aid screen (preferred for enrolled students), by postal mail or through <u>password-protected</u> email (password must be sent in a separate message). Applicants may also submit via their Admission Status page Materials Upload (use financial aid history as the file type and let <u>financialaid@cim.edu</u> know when items are there for review). Mailing address: CIM Financial Aid Office, 11021 East Blvd., Cleveland, OH 44106.

**NOTE:** PDF format only for uploads, please. No cell phone pictures of forms or tax returns

# **Verification Tracking Groups**

Students who are selected for verification by the Department will be placed in one of three verification groups (V1, V4, or V5) to determine which FAFSA information must be verified. Groups V2, V3, and V6 are reserved for future use by the Department.

## V1 Standard Verification Group

**Tax filers** (student, student spouse, parent, and parent spouse/partner, as applicable) must verify the following:

- Adjusted gross income
- Income earned from work
- U.S. income tax paid
- Untaxed portions of IRA distributions
- Untaxed portions of pensions
- IRA deductions and payments
- Tax-exempt interest income
- Education credits
- Foreign income exempt from federal taxation
- Family size



**Non-tax filers** (student, student spouse, parent, and parent spouse/partner, as applicable must verify the following:

- Income earned from work
- Family size

# V4 – Custom Verification Group

Students must verify the following:

- Identity
- Statement of educational purpose (SEP)

# V5 – Aggregate Verification Group

This group is essentially a combination of V1 and V4. Tax filers and non-tax filers must verify the items listed in the Standard Verification Group (V1). Students must also verify identity and statement of educational purpose.

## **Additional Process Details**

Schools must ensure the correct tax filing status was used and that those who are required to file, do.

Some students may be required to verify High School/GED completion status as well as complete a statement of Educational Purpose.

Schools may also verify discretionary items as we see fit. Any data element on the FAFSA may be requested for verification documentation and review.

After the initial verification document request has been met, CIM will compare to the information provided on the FAFSA. If all data matches, we will document the process as completed. We may ask for additional information if we find discrepancies that cannot be explained.

CIM must resolve any conflicting information before disbursing any federal financial aid. All federal aid and need-based institutional aid is subject to change until requested verification is completed and any applicable FAFSA corrections have been made. To avoid any last-minute changes to aid you may be eligible to receive, make every effort to complete your verification form(s) and submit appropriate tax documents as soon as possible.

Students whose financial aid information requires reprocessing, based on the verification process, will have FAFSA corrections electronically submitted by CIM. All corrections will generate an updated Student Aid Report which will be sent to the student by the Central Processing System (CPS). The Student Aid Index (SAI) may change based on the corrections made. If conflicting information is discovered after aid is awarded or disbursed, CIM must resolve the conflicting information and the student will be required to repay aid received more than their eligibility. All conflicts must be resolved regardless of whether the student was selected for verification or not.



If any changes to eligibility occur as the result of verification FAFSA corrections, the CIM Financial Aid Office will communicate via email to the student to detail what aid changes are required and such updates will be posted to the student's Populi Financial Aid tab, as applicable. Admitted applicants would receive an updated aid offer letter, if applicable.

# **Timeline and deadlines**

Please allow three weeks for the verification process to be completed, after all items have been submitted. The process may take longer if we receive incomplete documents or require additional information. The forms are very specific, so it's important to read the instructions carefully. Incomplete forms may be rejected.

While federal aid may appear on an aid offer and/or the student Populi account as scheduled/expected aid, federal aid funds cannot be officially disbursed until verification is completed.

Holds will be placed on accounts and/or scheduled federal aid will be removed if verification is not completed by August 15, 2025 for the Fall Semester and December 15, 2026 for the Spring Semester to allow processing time for your financial aid. If verification is submitted past the above dates, aid may still be able to disburse; however, it may be on a delayed schedule. The absolute cutoff for any verification to be accepted with final/acceptable documents/FAFSA corrections processed for the 2025-26 academic year is May 1, 2026.

Federal aid for the academic year will be forfeited if the student was selected for verification and did not complete all required components of the review by the deadlines noted above.

In some cases, CIM may request a **Low Income Supplement Form,** if the dependent student and/or family income/assets listed on the FAFSA and reviewed during Verification appear insufficient to support the number of people reported in your household, relative to the published <u>U.S. Poverty Guidelines</u>. For CIM to verify your eligibility for federal student aid, we may need additional information to document your means of support.

# Identity and Statement of Educational Purpose (V4 & V5)

Some students may be selected as V4 (Custom) or V5 (Aggregate) Verification Group by the Department of Education on the FAFSA.

- V4: Students selected for V4 Verification must submit the **Identity and Statement of Educational**Purpose Form in person to CIM or in the presence of and signed by a notary.
- **V5**: Students selected for V5 Verification must complete both the standard Dependent or Independent Verification form as detailed above AND the **Identity and Statement of Educational Purpose Form** in person to CIM or in the presence of and signed by a notary.

#### **Tax Documents to Submit**



In addition to the **Verification Worksheet Dependent** or **Verification Worksheet Independent**, as applicable, students (and their parent(s), if dependent) chosen for verification must submit 2023 income/federal tax information in one of these ways:

#### **Student Tax-filers:**

- The instructions below apply to the student and spouse (if the student is married). Notify the financial aid office if the student or spouse filed separate IRS income tax returns for 2023 or had a change in marital status after December 31, 2023.
- As part of federal student aid eligibility, students, and spouses (as appropriate), will be required
  to consent and approve sharing and importing income and tax information from the IRS to the
  FAFSA form, even if the attempt to obtain or use such data is ineffective. In other words, if the
  student and spouse filed separate 2023 IRS income tax returns, both must provide consent and
  approval to share and import income and tax information from the IRS. In most cases, no further
  documentation is needed to verify 2023 income information that was transferred into the
  student's FAFSA using income and tax information directly from the IRS.
- If 2023 income tax return information for the student (or spouse, if applicable) was not available or could not be used, the student should provide the institution with a 2023 IRS Tax Return Transcript(s) or a signed copy of the 2023 income tax return and applicable schedules.

### Parent Tax-filers: (for Dependent Students)

- The instructions below apply to each parent included in the household. Notify the financial aid office if the parents filed separate IRS income tax returns for 2023 or had a change in marital status after December 31, 2023.
- As part of federal student aid eligibility, parents will be required to consent and approve sharing and importing income and tax information from the IRS to the FAFSA form, even if the attempt to obtain or use such data is ineffective. In other words, if the parents filed separate 2023 IRS income tax returns, both must provide consent and approval to share and import income and tax information from the IRS. In most cases, no further documentation is needed to verify 2023 income information that was transferred into the student's FAFSA using income and tax information directly from the IRS.
- If 2023 income tax return information for the parents was not available or could not be used, the
  parents should provide the institution with a 2023 IRS Tax Return Transcript(s) or a signed copy
  of the 2023 income tax return and applicable schedules.

#### Non-filers (student/spouse and/or parent(s), as applicable)

- A list of the names of all employers, the amount earned from each employer in 2023, and
  whether an IRS W-2 form or an equivalent document is provided. If W-2 is provided a copy of
  each W-2 must be submitted. List every employer even if the employer did not issue an IRS W-2
  form.
- A signed statement certifying that the individual has not filed and is not required to file a 2023 income tax return, and a listing of the sources of any 2023 income earned by the individual from work and the amount of income from each source.

Joint return filers who are no longer married



When a student, or parents of a dependent student, filed a joint return and have separated, divorced, married someone else, or been widowed, the student must submit the following:

- A transcript obtained from the IRS or other relevant tax authority that lists 2023 tax account information of the tax filer(s); or
- A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2023 tax account information of the tax filer(s); and
- A copy of IRS Form W-2 for each source of 2023 employment income received or an equivalent document.

# **Immigrants and Tax Filing**

- Immigrants are not exempt from tax filing. An alien is anyone who is not a U.S. citizen or national. A resident alien is one who either is a permanent resident or has resided in the U.S. for a specific minimum amount of time (has met the substantial presence test). All others are nonresident aliens. Resident aliens' income is generally subject to tax in the same manner as U.S. citizens', and they file Form 1040. Nonresident aliens who are required to file a return submit Form 1040NR, which is acceptable documentation for verification.
- Immigrants who do not have an SSN and are unable to get one can apply with the IRS for an
  individual taxpayer identification number (ITIN). The ITIN is only for tax purposes. It does not
  authorize a person to work, endorse his or her legal status, or entitle them to the earned income
  credit or Social Security benefits.
- See the IRS's Publication 519, U.S. Tax Guide for Aliens at www.irs.gov for more information.

# **How to Obtain a Tax Return Transcript**

- <u>Get Transcript by Mail</u> Go to <a href="https://www.irs.gov/">https://www.irs.gov/</a>, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and NOT the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request.
- Get Transcript Online Go to <a href="https://www.irs.gov/">https://www.irs.gov/</a>, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and NOT the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication.
- <u>Automated Telephone Request</u> 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request.
- <u>Paper Request Form</u> IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.

# **Special Circumstances and How to Report**

# Taxpayer has filed an amended federal tax return for 2023 (1040X)

An individual who filed an amended IRS income tax return for tax year 2023 must provide a signed copy of the 2023 IRS Form 1040X, "Amended U.S. Individual Income Tax Return," that was filed with the IRS



or documentation from the IRS that include the change(s) made by the IRS, in addition to one of the following:

- Updated income and tax information from the IRS on an ISIR record with all tax information from the original tax return;
- A **2023 IRS Tax Return Transcript** (that will only include information from the original tax return and does not have to be signed), or any other IRS tax transcript(s) that includes all the income and tax information required to be verified; or
- A signed copy of the 2023 IRS Form 1040 and the applicable schedules that were filed with the IRS.

### Taxpayer had an IRA/Pension Rollover in 2023:

Students or parents who had an IRA or pension rollover during the 2023 tax year need to provide additional documentation.

For the 2023 tax year, the untaxed portion of IRA distributions is reported on 1040 lines 4a minus 4b, and the untaxed portion of pension and annuity distributions are reported on 1040 lines 5a minus 5b. Sometimes, these amounts are "rolled over" into another qualified IRA, pension, or annuity plan, so these rollover amounts are not actually received as untaxed income. The rollover amount is verified and subtracted from the untaxed IRA, pension, and annuity distribution amounts, as applicable. The rollover amount cannot be a negative number.

#### For CIM to verify the rollover amount, please submit the following:

- A signed and dated written statement from the tax filer confirming the IRS-authorized rollover amount;
- A copy of the Tax Return Transcript or alternative tax transcript\* with the word "rollover" handwritten or typed next to the applicable line items; or
- A signed and dated copy of the 1040 tax return that was filed with the IRS with the word "rollover" handwritten or typed next to the applicable line items
- \*Transcript notation must be signed and dated by the taxpayer.

#### Please also submit:

- IRS Form 1099-R, by subtracting box 2a from box 1 and treating the difference as a rollover if there is a code "G" or "H" in box 7; or
- IRS Form 5498, using the rollover amount in box 2

## **Victim of Identity Theft**

An individual who was the victim of IRS tax-related identity theft must provide:

- A Tax Return DataBase View (TRDBV) transcript obtained from the IRS or, if unable to obtain a
  TRDBV, an equivalent document provided by the IRS or a copy of the signed 2023 income tax
  return and applicable schedules the individual filed with the IRS; and
- A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS is aware of the tax-related identity theft.

#### Filed Non-IRS Income Tax Return

• A tax filer who filed an income tax return with a tax authority other than the IRS may provide a signed copy of his or her income tax return that was filed with the relevant tax authority.



However, if we question the accuracy of the information on the signed copy of the income tax return, the tax filer must provide CIM with a copy of the tax account information issued by the relevant tax authority before verification can be completed

## Granted a Filing Extension by the IRS for 2023 and have not yet filed the return

An individual who is required to file a 2023 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2023, must provide to the CIM Financial Aid Office:

- A signed statement listing the sources of any 2023 income and the amount of income from each source;
- A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2023;
- A copy of IRS Form W–2 for each source of employment income received or an equivalent document for tax year 2023; and
- If self-employed, a signed statement certifying the amount of the individual's Adjusted Gross Income (AGI) and the U.S. income tax paid for tax year 2023.

# Reporting to the Office of the Inspector General (OIG)

**Warning**: if you purposely give false or misleading information on any application for Title IV or HEA programs, including the Verification Worksheet and income/tax documents, you may be fined, sentenced to jail, or both. Any suspected fraud will be reported to the Office of the Inspector General (OIG) of the Department of Education as required by CFR Title 34 section 668.16 (g) and 668.53a5. This may include, but is not limited to, false claims of independent status, false claims of citizenship, use of false identities, forgery of signatures or certifications, or false statements of income.

#### All Verification items must be submitted to the CIM Financial Aid Office:

- Upload securely via:
  - Current Students: Populi Financial Aid screen (Files → Add)
  - Applicants: Admission Status Page Materials Upload (Financial Aid History choice)
- V4/V5 Form, if applicable, must be presented in person with appropriate legal ID or the notarized form mailed to CIM.
- Postal mail: CIM Financial Aid Office, 11021 East Blvd, Cleveland, OH 44106
- Email: financialaid@cim.edu (password protected files ONLY when emailing tax items; password must be sent in a separate email)

Questions? Please contact the CIM Financial Aid Office at <a href="mailto:financialaid@cim.edu">financialaid@cim.edu</a> or call 216-795-3192.