

4/3/2020

Ms. Diane Auer Jones  
Principal Deputy Under Secretary  
Delegated Duties of the Under Secretary  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Ms. Jones,

With significant numbers of businesses, government offices, secondary schools, and colleges and universities closing and/or moving to telework arrangements to slow the spread of COVID-19, students are facing new obstacles as they try to confirm their eligibility for federal student aid by submitting verification documentation and resolving C codes.

**Verification**

Students whose applications are flagged with the V4 and V5 verification codes, are required to provide the financial aid office, in person or via notarized documents, with proof of high school completion, identity, and statement of educational purpose. Appearing at the financial aid office in person is not a possibility for the vast majority of students at the moment, and it's unknown when it may once again become feasible. Visiting a notary has also ceased to be an option, as banks and institutions are either voluntarily closing or switching to remote operations. While online notary services do exist, the Department of Education (ED) does not permit such use for verification purposes. We ask that ED temporarily lift this restriction until in-person services are fully restored, and that for students who are unable to access any notary services — online or otherwise — that ED permit institutions to temporarily complete V4 and V5 verification with unnotarized copies of documents. In order to protect program integrity, if at any point the school becomes aware that a student who self-certified as having a diploma does not actually have a one, all future disbursements must be canceled, but the institution should not be held responsible for returning previously disbursed funds.

Verification of high school completion may also be difficult for students to obtain, with most secondary schools in the U.S. closed for at least some period of time, and some already closed for the rest of the academic year. ED should allow students to self-certify high school completion in cases where it is impossible for students to obtain this documentation due to COVID-19-related closures until such time as it is reasonable to expect that students can obtain such documentation in the future.

ED notes in the Federal Student Aid Handbook that institutions should report V4 and V5 verification results to the "FAA Access to CPS Online" website no more than 60 days following their first request to the student for documentation of identity and high school completion, and states that inaccurate and untimely reporting may subject institutions to findings as a result of their annual compliance audit or a program review. Given the additional difficulties that students and institutions may face in collecting this information, we ask that ED grant temporary relief on this reporting requirement until such time as it is

reasonable to expect that they can return to compliance with this deadline.

Students assigned the V1-Standard verification group may face challenges in providing documentation as well. There are some students and parents of dependent students who do not have a copy of their tax return and may need to request a tax transcript. While these may be requested online, by mail, or by phone, it is reasonable to expect that Internal Revenue Service (IRS) response times may be delayed. For others who already have their tax return, obtaining a transcript from the IRS may be an additional burdensome and time-consuming request. We ask that ED grant the maximum possible latitude to students and institutions for verification in these extraordinary times. This includes reminding institutions that a tax return is an acceptable form of documentation for verification of income.

Nonfilers of federal tax returns are currently required to provide copies of W-2 forms for verification purposes. This could prove problematic as small businesses shutter, either temporarily or permanently, as a result of the COVID-19 pandemic, making it difficult or impossible for employees or former employees to obtain W-2 copies. ED should allow institutions flexibility to accept a signed statement from nonfilers who are unable to obtain W-2 forms from their employers due to COVID-19-related closures, including instances where businesses are still operating, but unable to access paper documents.

Concerns related to the difficulty or inability to complete verification are amplified by the fact that verification must be completed prior to using Professional Judgment (PJ). In these difficult times, PJ requests will certainly increase due to COVID-19-related job loss, medical expenses, and other unusual circumstances families may face. It is essential that verification relief be provided so that institutions can address PJ requests in a timely manner.

### **C Flags**

Resolution of C codes is also a concern due to COVID-19-related disruptions. For instance, while institutions are not required to collect original or notarized copies of documents proving citizenship or eligible noncitizen status, ED has indicated that this practice is strongly recommended. ED should issue updated temporary guidance with more explicit permission for institutions to collect non-notarized copies of students' proof of citizenship or eligible noncitizenship status.

The Selective Service System has indicated that its staff are currently teleworking due to the COVID-19 outbreak, and that it has temporarily suspended issuing Status Information Letters until further notice. Because of this ED, should temporarily waive the requirement for students who failed to register before age 26 with the Selective Service System to obtain a Status Information Letter, until such letters are made available through the Selective Service System.

### **Institution-Specific Challenges**

Many institutions, while continuing to offer distance education and award and disburse aid, will not physically re-open their campuses for the remainder of the academic year. Those institutions without document imaging systems may be unable to access paper documents for verification or C code resolution purposes.

Institutions without student portals or other document uploading functionality may not have the resources to implement such technology at this time. ED has indicated in the past that email is not considered a secure method for institutions to collect documentation from students. ED should issue guidance on best practices institutions can follow to ensure the security of student information, while taking into account institutions' limited time and financial constraints and offering solutions that can be easily and inexpensively implemented.

Because telework arrangements were, in many cases, implemented without significant advance planning, financial aid staff working from home may receive documents via text message, email or other non-official means as students scramble to provide the documentation required for them to receive aid. Teleworkers may not have the ability to print documents or save them to secure, networked drives, increasing the risk of lost documentation. Some leniency for missing documentation should be granted for the time period during which institutions' in-person operations were interrupted due to COVID-19.

While the primary concern with these requests is for the completion of the current academic year, ED should take into account that COVID-19 disruptions may extend farther into the future, and therefore any relief it grants may need to be extended as well.

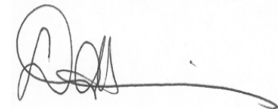
Regards,



Justin Draeger,  
President, NASFAA



Kim Cook,  
Executive Director,  
NCAN



David Hawkins,  
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