



NASFAA

PRISON EDUCATION PROGRAM

WEB CENTER

NASFAA Prison Education Program Learning Series

Verification

Award Years 2025-26 and Later

What is verification? Every year, the U.S. Department of Education (ED) selects a 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 areas of the financial aid application can be subject to verification, students who are confined or incarcerated and selected for verification only have one verification requirement: providing proof of identity. They do not need to verify any other FAFSA items unless there is conflicting information related to those items. Note that the Statement of Educational Purpose was a verification element in previous years, but after June 6, 2025, it is no longer required for the 2025-26 or subsequent award years.

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 confined or incarcerated students? After the student files a FAFSA, both the financial aid office and the student receive a summary of the results of ED's application processing. The school receives an Institutional Student Information Record (ISIR), and the student receives a FAFSA Submission Summary (FSS). These summaries indicate whether the application requires verification, and the school requests the necessary documentation. Verification requests have verification tracking flags that indicate the type of verification required. For students who are confined or incarcerated, only flags V4 or V5 require verification; other flags do not. V4 and V5 request proof of identity.

What types of identification documents are acceptable? The student must present a valid, unexpired government-issued photo ID using one of the methods listed below. This includes either U.S. government-issued or U.S. state-issued photo IDs. Students who are confined or incarcerated can use their ID issued by the public or privately operated correctional facility, even if those IDs don't have an expiration date. A military ID cannot be photocopied for federal student aid purposes and therefore cannot be used. A school-issued ID is also not acceptable.

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 name recorded on the FAFSA 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 document how it was resolved.

What are the valid methods for verification? There are currently several valid methods for completing the identity verification for students who are confined or incarcerated.

- Verification can be done in person with the student. In this primary and preferred method, the student meets with a school-designated individual (which is usually a school official) and presents their ID. The designated individual then must make a copy of the ID and annotate it with their name and the date it was presented. It is a good practice for the financial aid office to maintain a list of those staff members authorized to verify identity.

If a designated school official is not able to meet with the student in person to complete verification, a notary public or video call can substitute.

- If a notary public is used, the notary must view the ID in person and copy it, and then notarize receipt of the ID in a signed notary statement or on the copy of the ID. The ID copy and notarization must be hand-delivered or mailed (U.S. Postal Service, FedEx, UPS) to the college's financial aid office and retained there — that is, they cannot be delivered to the financial aid office electronically.
- If a video call is used, the student can appear on a video call with the designated school official, who must capture a copy of the ID and annotate it with their name and the date it was presented. The video call option will require the school to maintain a scanned copy (electronic or hardcopy) of the annotated ID. This can be accomplished through a screenshot of the video call that has legible details of the ID. Note that if there is a law imposing restrictions on screen capture in a school's state, then the school could choose not to use the video call method to verify a student's identity and instead use one of the other methods.

Because ED recognizes that obtaining notarization or holding video calls inside a correctional facility can be challenging, another option exists for these students if they are unable to participate in an in-person identity verification process. A signed statement from an authorized official at the correctional facility or oversight entity can replace the services of a notary public to verify the student. The financial aid office must retain a copy of the ID and signed statement.

- A final valid method is verification of identity via an entity that is compliant with the National Institute of Standards and Technology (NIST) Identity Assurance Level 2 (NIST IAL2). This method can be used even if the student can appear in-person with a designated school official. To use this method, the school must receive and maintain documentation directly from the third party confirming that the school and this third party are referring to the same person, the date that verification took place, and that the student's identity is verified under the NIST standard. This method may not be a realistic option for students who are confined or incarcerated.

Verification cannot be completed by someone who holds a power of attorney for the student.

Frequently Asked Questions

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

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

Is verification of identity required more than once?

Effective with the 2026-27 award year, schools are not required to reverify a confined or incarcerated student's identity as long as they remain enrolled in the same postsecondary institution at the same correctional facility and have had their identity previously verified under the V4 or V5 tracking group.

What if I find conflicting information on the ISIR or FAFSA Submission Summary of a confined or incarcerated student?

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

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 confined or incarcerated, must the school verify income and data elements if the ISIR or FAFSA Submission Summary shows a verification flag of V1, V4, or V5?

No, confined or incarcerated students selected for verification are only required to verify their identity for verification flag V4 or V5. Confined or 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 other than identity.

If a student has a pending request for professional judgment (PJ), including for dependency overrides due to unusual circumstances, can the school make that determination before completing verification?

It depends. Verification does not need to be completed before making a PJ adjustment if 1) the aid administrator will be removing the information (such as income) due to PJ; 2) the student was not already selected for verification by the FAFSA Processing System (FPS) or the school; or 3) if the aid administrator will be performing a dependency override. The school can submit the verification and PJ adjustments on the same ISIR transaction, or the school can submit the verification corrections on one transaction and then wait to receive the resulting ISIR transaction back from the FPS before making the PJ adjustments (in which case the PJ adjustments are made on the subsequent transaction).

Must a confined or incarcerated student's spouse or parents complete verification?

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

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

