

Verification

Verification

NAFAA Fall Conference



Bruce Honer, FSA Trainer | October 2017
U.S. Department of Education

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**2017-18
Verification
Changes Overview**



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Tracking Groups and Data Elements

- Verification Tracking Group V6 was eliminated for 2017-18
 - Schools still have authority to select additional students and items of their choosing for verification
- SNAP and Child Support Paid removed as individual verification items under V1, V4 or V5

DCL GEN-16-07



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GEN-17-04 (April 24, 2017)

- Due to DRT concerns, we are providing institutions with flexibilities they may choose to use as part of their verification procedures for **2016-2017 and 2017-2018**:
 - **IRS Tax Return Filers** – In lieu of using the IRS DRT, or obtaining an IRS transcript, institutions *may* consider a signed paper copy of the 2015 IRS tax return that was used by the tax filer for submission to the IRS as acceptable documentation to verify FAFSA/ISIR tax return information
 - Signature requirements (FSA HDBK, AVG section Chapter 4) indicate one of the filers of a joint return and tax preparer signatures are acceptable

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GEN-17-04 (April 24, 2017)

- **Verification of Nonfiling** – Institutions no longer required to collect documentation obtained from IRS or other tax authorities verifying that applicant, the applicant’s spouse or the applicant’s parents did not file a 2015 tax return
 - Nonfilers must still provide - signed statement certifying individual has not filed and not required to file and a listing of sources of 2015 income earned and W-2s, if applicable
 - Signed verification worksheets with this information provided is acceptable
- GEN-17-04 serves as guidance for alternative documents when tax filer is unable to obtain a tax transcript (replaces the 10/18/16 electronic announcement)

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Use of Documents from 2016-17

- School can use verification documents from 2016-2017 to meet 2017-2018 requirements for the following items:
 - Adjusted Gross Income (AGI); U.S. Income Tax Paid ; Untaxed Portions of IRA Distributions; Untaxed Portions of Pensions; IRA Deductions and Payments; Tax Exempt Interest Income; Education Credits; Income Earned from Work
- Documentation of high school completion obtained prior to the 2017–2018 award year is acceptable
- Must obtain new documentation for:
 - Number of Household Members
 - Number in College
 - Identity/Statement of Educational Purpose

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2017-2018 Verification Tracking Groups: Data Elements & Documentation



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Verification Selection Groups

- V1 – Standard Verification Group
- V2 – Reserved
- V3 – Reserved
- V4 – Custom Verification Group
- V5 – Aggregate Verification Group
- V6 – Reserved



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V1– Tax Filers

- Adjusted Gross Income
- U.S. Income Tax Paid
- Untaxed Portions of IRA Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Credits

Documentation:

- IRS DRT;
- Tax Return Transcripts;
- Alternate documentation where allowed (e.g. amended returns, foreign returns, etc.)

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Amended Tax Returns

Individuals who filed an amended tax return must submit the following documents to the institution:

- an IRS Tax Return Transcript, or any other IRS tax transcript(s) that include all of the income and tax information required to be verified;
 - *May use a signed paper tax return for 2017/2018*
- and
- a signed copy of the IRS Form 1040X that was filed with the IRS

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IRS Identity Theft

Victims of IRS tax-related identity theft must submit:

- Statement signed and dated by tax filer indicating they were victims of IRS tax-related identity theft and the IRS has been made aware of the tax-related identity theft; and
- A Tax Return DataBase View (TRDBV) transcript obtained from the IRS
 - Tax filers who cannot obtain a TRDBV transcript may instead submit another official IRS transcript or equivalent document provided by the IRS if it includes all of the income and tax information required to be verified
 - *A paper signed tax return is acceptable for 2017-2018*

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V1 – Tax Non-Filers

- Income earned from work

Documentation

1. **Signed statement certifying the following:**
 - Individual has not filed and not required to file 2015 tax return;
 - Sources of income earned from work and amounts of income from each source for tax year 2015; and
2. Copy of IRS Form W-2 (or Wage and Income Transcript) for each source of employment income received for tax year 2015, and
3. Verification of Non-Filing Letter from the IRS (**NOT REQUIRED FOR 2017-2018**)

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IRS Verification Documentation

- February 23, 2017 Electronic Announcement
 - Contains a chart that outlines the verification documents that can be requested from the IRS, the IRS document or response that will result from each request, where the response will be sent, and an estimate of the time for the IRS to respond to the request
 - Verification of Nonfiling (VNF)
 - IRS documents that clearly indicate IRS does not have a tax return record on file for the tax year are acceptable for VNF
 - Includes Tax Return Transcripts/Tax Account Transcripts that indicate "no record of return filed" or "no transcript on file"
 - Includes any version of IRS Form 13873 that clearly states that the form is provided to the individual as verification of nonfiling or states the IRS has no record of a tax return

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Non-IRS Tax Filers

Income Information for Non-IRS Tax Filers

- Tax filers who filed an income tax return with a taxing authority in a **U.S. territory** (Guam, American Samoa, the U.S. Virgin Islands) or **commonwealth** (Puerto Rico and the Northern Mariana Islands) or with a **foreign central government**, must submit a copy of a transcript of their tax information
 - A signed copy of the applicable 2015 income tax return that was filed with the taxing authority is only acceptable if tax filers are unable to obtain a free copy of a transcript of their tax information

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Verification Q & A

- DOC-Q28: ...Which tax authorities charge a fee to obtain this information?
- DOC-A28: The tax authorities for Guam, the Commonwealth of the Northern Mariana Islands, the Commonwealth of Puerto Rico and the U.S. Virgin Islands charge a fee to obtain tax account information. Therefore, a tax filer who filed an income tax return with these tax authorities may provide institutions with a signed copy of his or her income tax return that was filed with the relevant tax authority. ...
...A tax filer who filed an income tax return with tax authorities not mentioned above, i.e. a foreign tax authority, and who indicates that they are unable to obtain tax account information free of charge, must provide the institution with documentation that the tax authority charges a fee to obtain information, along with a signed copy of his or her income tax return that was filed with the relevant tax authority

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Non-IRS Nontax Filers

Income Information for Non-IRS Nontax Filers

- **Residents of the Freely Associated States** (Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia), or a **U.S. territory or commonwealth** or a **foreign central government** who are not required to file an income tax return under that taxing authority's rules must submit the following:
 - a copy of their Wage and Tax Statement (or equivalent documentation) for each source of employment income and
 - a signed statement identifying all of the individual's income and taxes

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V1– All Applicants

- Number in Household & Number in College

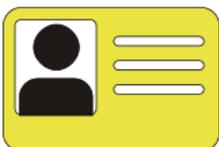
Documentation:

- **Household size** – signed statement (name, age, relationship)
 - Not required for certain logical assumptions:
 - Dependent student household size reported is 2 and parent is unmarried or 3 if the parents are married or unmarried and living together
 - Independent student household reported is one and applicant is unmarried or two if the applicant is married
- **Number in College** – signed statement (name of household member attending at least half-time and eligible institution name)
 - Not required if reported number is one (student)

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V4—Custom

- High School Completion Status
- Identity/Statement of Educational Purpose

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High School Completion Status

Documentation:

- High school diploma; or
- Final official high school transcript showing date diploma awarded; or
- “Secondary school leaving certificate” for students who completed secondary education in foreign country and unable to get copy of high school diploma/transcript
- **Note:** If, prior to being selected for verification, an institution already obtained HS completion status records for other purposes, the institution may rely on those records as long as it meets ED HS completion criteria

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High School Completion Status

- For V4 and V5, if institution successfully verified and documented applicant’s high school completion status for a prior award year, verification of high school completion status is not required for subsequent years
- DD Form 214 Certificate of Release or Discharge From Active Duty *may serve* as alternative documentation to verify a student’s high school completion if it indicates that the individual is a high school graduate or equivalent
- An institution may not accept as alternative documentation an applicant’s self-certification

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High School Completion Status

In rare cases where it is impossible for a *refugee, an asylee or a victim of human trafficking* to obtain documentation of his or her completion of a secondary school education in a foreign country, an institution may accept self-certification from these applicants

- Q&A FHD-Q2/A2 (program integrity Q & A website under HSD)
- Required information included:
 - Proof of attempt to obtain documentation of their completion of a secondary school education in a foreign country
 - Signed/dated statement that indicates applicant completed secondary school education in a foreign country along with - name and address of foreign high school and date foreign HS diploma was awarded
 - Copy of entry status documentation showing status as a refugee, asylee, or victim of human trafficking and who entered the US after the age of 15

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High School Completion Status

Documentation: Recognized equivalent of a HS diploma

- Copy of the student's General Educational Development (GED) certificate, an official GED transcript that indicates the student passed the exam, or a state-authorized HS equivalent certificate; OR
- Academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; OR
- Student excelled academically in HS and met all criteria to be admitted into a 2-year degree program or higher

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High School Completion Status

- Test transcripts of State-authorized examinations (e.g., GED test, HiSET, TASC, or other State-authorized high school equivalency examinations) are acceptable documentation of high school completion only if:
 - The official test transcript specifically indicates that a state has determined that the test results are considered by the State to meet its requirements of high school equivalency;

OR

- The official test transcript includes language that the final score is a passing score

26 DCL – GEN-14-06 Federal Student Aid PROUD SPONSOR of the AMERICAN MIND™
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High School Completion Status

- Documentation: Homeschooled
 - Transcript, or the equivalent, signed by the parent or guardian, that lists the secondary school courses completed by the applicant and documents the successful completion of a secondary school education;

OR

- A secondary school completion credential for home school provided for under State law

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Identity/Statement of Educational Purpose

- Documentation: students that appear in person
- Present to an institutionally authorized individual
 - A valid NON-EXPIRED U.S. government-issued photo ID; &
 - *Cannot use military IDs*
 - A signed statement of educational purpose
 - Wording provided by ED, cannot be modified
- Maintain, an annotated copy of the identification:
 - The date documentation was received; and
 - The name of the institutionally-authorized individual that obtained the documentation

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Identity/Statement of Educational Purpose

Documentation: student unable to appear in person

- Must provide the institution—
 - Copy of valid, NON-EXPIRED U.S. government-issued photo ID
 - *Cannot use military IDs*

AND

- An *original*, notarized statement of educational purpose signed by the applicant (no online notaries allowed)
 - Cannot be faxed or scanned
 - After examining *original* Statement of Educational Purpose, institution may convert it to an electronic record

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V5 – Aggregate

- High School Completion Status
- Identity/Statement of Educational Purpose

AND

- All items indicated-Tax Filer (V1)
- All items indicated-Non-Tax Filer (V1)

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**V4/V5 Tracking Results:
2017-2018 & 2018-2019**

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**V4/V5 Tracking Results
2017-2018 & 2018-2019**

- The V4 and V5 tracking process in FAA Access that began in the 2014-15 processing year WILL CONTINUE for 2017-2018 AND 2018-2019
- Schools need to select the proper award year for which they are providing results
 - 2017-18, 2018-2019, etc.

<https://faaaccess.ed.gov>

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V4/V5 Tracking Results

Use the **Identity Verification Results** section on the FAA Access home page

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V4/V5 Tracking Results

Whom to report: student for whom school received an ISIR with a Verification Tracking Group of V4 or V5 AND for whom school requested verification documentation

- Do NOT include students the school selected for verification of identity or high school completion status

When to report: 60 days following the institution's first request to the student to submit the required V4 or V5 identity and high school completion documentation

- Changes to previously submitted Identity Verification Results must be updated within 30 days

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V4/V5 Tracking Results

New Value #6 added to drop down options for 2017-18:

- Dropdown options for 2017-18 will now be:
 - Verification completed in person, no issues found
 - Verification completed remotely, no issues found
 - Verification attempted, issues found with identity
 - Verification attempted, issues found with HS completion
 - No response from applicant or unable to locate
 - Verification attempted, issues found with both identity and HS completion**

35 Elec. Ann. – 8/19/16; 11/18/16 Federal Student Aid | PROUD SPONSOR of the AMERICAN MIND™
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Suggested Text



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Suggested Text

- 2017-2018 Elec. Ann. (7/29/16) & 2018-2019 Elec. Ann. (8/16/17)
- Contains 3 appendices to assist with crafting school verification documents to gather verification data
- Appendix A – Suggested Text
 - Not required to use ED’s suggested text and formats
 - **ONE EXCEPTION – must use the exact language provided in the “Statement of Educational Purpose” (Groups V4 & V5)**
- Appendix B – Table of verification items
- Appendix C – Verification tracking groups and FAFSA verifiable information

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2018-2019 Verification Changes Overview



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2018-2019 Verification

- May 5, 2017 Federal Register and GEN-17-05
 - No changes to verification tracking groups
 - Tax extenders must now show IRS proof of extensions beyond automatic 6-month extension
 - If cannot produce, must provide tax data through DRT or tax transcripts
 - *Dependent students* who do not file taxes, do not have to provide proof of nonfiling

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2018-2019 Verification

- May 5, 2017 Federal Register and GEN-17-05
 - An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of 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

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2018-2019 Verification

- May 5, 2017 Federal Register and GEN-17-05
 - Remind schools that students selected for verification that qualify for an auto zero EFC have reduced requirements –
 - For dependent students
 - The parents' AGI if the parents were tax filers
 - The parents' income earned from work if the parents were nontax filers; and
 - The student's high school completion status and identity/ statement of educational purpose, if selected

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2018-2019 Verification

- May 5, 2017 Federal Register and GEN-17-05
 - Remind schools students selected for verification that qualify for an auto zero EFC have reduced requirements:
 - For independent students
 - The student's and spouse's AGI if they were tax filers
 - student's and spouse's income earned from work if were nontax filers
 - The student's high school completion status and identity/ statement of educational purpose, if selected;
 - The number of household members to determine if the independent student has one or more dependents other than a spouse

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IRS DRT Changes for 2018-2019

- The IRS DRT function will be reinstated for use in the 2018-2019 FAFSA on the Web
- To enhance the security and privacy of the sensitive personal data, all DRT data will be encrypted/masked and hidden from view on:
 - IRS DRT website
 - FAFSA web pages
 - Student Aid Report (SAR)
- Applicants and parents will see the words "Transferred from the IRS" in the data entry fields on the FAFSA web pages and SAR

Elec. Ann. 8/7/17  PROUD SPONSOR of the AMERICAN MIND™

IRS DRT Changes for 2018-2019

- Institutional and state agency ISIRs will have IRS data
 - Because transferred data is not displayed, applicants and parents will be unable to make corrections to IRS DRT transferred items on FAFSA form before or after submission
 - However, institutions will continue to be able to make any necessary DRT data field corrections
 - Anticipate few corrections since data coming from IRS
 - Possible corrections: rollover correction; not allowed to use DRT; amended tax return
 - If secure access, schools will be able to share IRS-DRT information with student/spouse/parent
 - "Secure access" guidance forthcoming

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IRS DRT Changes for 2018-2019

- Special provisions for Rollovers:
 - If greater than \$0 transferred from IRS into Untaxed Portions of IRA Distributions field/Untaxed Portions of Pensions field, applicant/parent required to answer a new question about a rollover
 - If they answer "yes," he/she will be required to provide the amount of the rollover in a new entry field
 - System will subtract user-reported rollover amount from the IRA/Pension distribution that was transferred from the IRS, and the result will be used in the calculation of the EFC

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IRS DRT Changes for 2018-2019

- Special provisions for Income Earned From Work:
 - Because IRS-transferred information will not be displayed, applicants and parents who filed a *joint tax return* will no longer be able to transfer their combined income earned from work into the FAFSA form from the IRS DRT website
 - These joint filers will now be required to enter their income earned from work manually
 - Single applicants and single parents will continue to have their income earned from work transferred from the IRS into their FAFSA form

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IRS DRT Changes for 2018-2019

- IRS Data Field Flags
 - NEW set of flags to help financial aid administrators know what, if any, specific information was changed once retrieved from the IRS and transferred into the FAFSA form
 - Flags provided separately for student and parent
 - Flags listed for EACH IRS-related data fields that can be transferred from the IRS
- DIFFERENT flags than the IRS Request Flags
 - 02 Request flag still means no data changed for verification purposes

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IRS DRT Changes for 2018-2019

- List of *IRS Data Field Flag* values:
 - Blank = IRS data not transferred from IRS (FAFSA submitted via paper or by a financial aid administrator)
 - 0 = IRS data not transferred from IRS (FAFSA not submitted via paper or by a financial aid administrator)
 - 1 = IRS data transferred from IRS – Not changed by user
 - 2 = IRS data transferred from IRS – Field changed by user prior to submission of application (only occur if IRA/Pension fields changed by user entering rollover amount)
 - 3 = IRS data transferred from the IRS – Field corrected by the user on this transaction
 - 4 = IRS data transferred from the IRS – Field corrected by the user on a previous transaction

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Resources

Federal Student Aid Handbook

- Application and Verification Guide – Chapter 4
- **Federal Registers**
- April 1, 2016 (2017-18 verification items & documentation)
- May 5, 2017 (2018-2019 verification items & documentation)
- **Dear Colleague Letters**
- GEN-16-07 (4/5/16) - 2017-18 verification items and documentation
- GEN-17-04 (4/24/16) – adjustments to 16/17 and 17/18 documentation
- GEN-17-05 (5/25/17) - 2018-19 verification items and documentation
- **Electronic Announcements**
- July 29, 2016 (2017-18 suggested verification text)
- August 16, 2017 (2018-19 suggested verification text)

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Resources

Program Integrity Q & A Website (Verification)

- <http://www2.ed.gov/policy/highered/reg/heardrulemaking/2009/integrity-qa.html>
- **FSA Assessments**
- <http://ifap.ed.gov/qahome/qaassessments/fsaverification.html>
- Activity 3 – Verification Codes
- **Federal Regulations**
- 34 C.F.R. § 668 Subpart E (668.51 – 668.61)
- 34 C.F.R. § 668.16(f)



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Department of Education Contacts

Research and Customer Care Center
800.433.7327
fsa.customer.support@ed.gov



Reach FSA
855.FSA.4FAA -- 1 number to reach 10 contact centers!

eZ-Audit	<i>Campus Based Call Center</i>
COD	<i>School Eligibility Service Group</i>
CPS/SAIG	<i>Foreign Schools Participation Division</i>
NSLDS	<i>Research and Customer Care Center</i>
G5	<i>Nelnet Total & Permanent Disability Team</i>

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Contact Information

Contact me with follow-up questions about this session:
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Training Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation

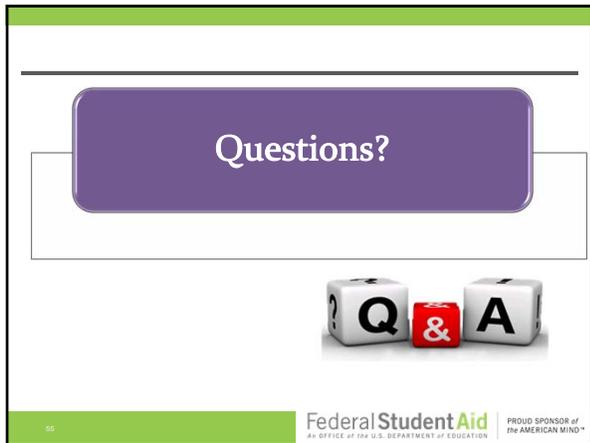
- Go to: <http://s.zoomerang.com/s/BruceHoner>
- Evaluation form is specific to Bruce Honer
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to joann.borel@ed.gov; 936-201-3298

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