


PPY & Conflicting Information



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Agenda

- PPY
- GEN-16-14
- Discussion/Q & As

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2017-18 Application Changes

- Two major changes beginning with 2017-18 award year
 - Early FAFSA launch
 - Beginning with 2017-18 award year, FAFSA cycle will begin on October 1 instead of January 1
 - 2017-18 FAFSA available 10/01/16
 - Change is permanent
 - Prior-Prior year income
 - 2017-18 FAFSA will collect tax year 2015 income
 - IRS Data Retrieval Tool (DRT) available at time of launch

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CHANGES TO THE FAFSA PROCESS FOR 2017-18

SUBMIT A FAFSA EARLIER. Students will be able to submit a 2017-18 FAFSA as early as Oct. 1, 2016, rather than beginning on Jan. 1, 2017. The earlier submission date will be a permanent change, enabling students to complete and submit their FAFSA as early as October 1 every year. (There is NO CHANGE to the 2016-17 schedule. The 2016-17 FAFSA became available Jan. 1, 2016.)

USE EARLIER INCOME AND TAX INFORMATION. Beginning with the 2017-18 FAFSA, students will report income and tax information from an earlier tax year. For example, on the 2017-18 FAFSA, students (and parents, as appropriate) will report their 2015 income and tax information, rather than their 2016 income and tax information.

Here's a summary of key dates for submitting the FAFSA depending on when you plan to go to school:

IF YOU PLAN TO ATTEND COLLEGE FROM	YOU WILL SUBMIT THIS FAFSA	YOU CAN SUBMIT THE FAFSA FROM	USING INCOME AND TAX INFORMATION FROM
July 1, 2015-June 30, 2016	2015-16	January 1, 2015-June 30, 2016	2014
July 1, 2016-June 30, 2017	2016-17	January 1, 2016-June 30, 2017	2015
July 1, 2017-June 30, 2018	2017-18	October 1, 2016-June 30, 2018	2015
July 1, 2018-June 30, 2019	2018-19	October 1, 2017-June 30, 2019	2016

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GEN-16-14

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GEN-16-14: Conflicting Information

- ED will identify possible conflicting information resulting from use of 2015 income and tax information for 2016-17 and 2017-18 FAFSAs
- Limit burden and minimize instances of conflicting information related to 2015 income and tax information
- Normal conflicting information rules apply for non-income and tax related information

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GEN-16-14: Conflicting Information

- FOTW new edits warn if one or more income or tax amounts reported for 2017-18 differs from amount reported on 2016-17 FAFSA
- If corrections not entered, comments included on SAR and ISIR
- Edits NOT triggered if
 - 2016-17 FAFSA transaction was based on estimated income/taxes
 - Change in dependency status between two years
 - There has been a change in either student's or parents' marital status between two years

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- CPS will identify conflicting information between two years that once resolved would have significant impact on EFC
- CPS will NOT flag if
 - Student is not expected to be Pell-eligible
 - Change in dependency status between two years
 - Change in student's or parents' marital status between two years
 - PJ was performed in either year

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- Institutionally required resolution
- Student's 2017-18 ISIR and SAR will be flagged with 'C' code and comment code 399
 - Will NOT be included on 2016-17 ISIR
- If comment code 399 not included on 2017-18 ISIR, school is not required to determine if there are any differences in income or tax information between two ISIRs
 - *However, any other conflicting information (e.g., citizenship status or HS completion status) must be resolved*

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- Applicability of ISIRs
 - School does NOT have to resolve comment code 399 if
 - Never received 2016-17 ISIR
 - Received 2016-17 ISIR but did not and will not disburse TIV aid in *either* year
 - School does have to resolve comment code 399 if
 - Received 2016-17 ISIR and disbursed or may disburse TIV aid
 - Received 2016-17 ISIR but did not review or process 2016-17 ISIR

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- Resolving potential conflicting information
 - School must compare all of 2015 income and tax-related FAFSA/ISIR items from both years' ISIRs to determine which are in conflict
 - If, for either year, *school had verified conflicting information or student/parent used IRS DRT and did not change any of transferred data*, school can assume verified or DRT values are correct and submit changes to other ISIR's year's values
 - Exception
 - If school is aware that subsequent to verification, amended tax return was filed, school must ensure both years' ISIRs based on amended tax data

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- Conflicts must be resolved if information
 - Was not verified
 - Was not transferred using IRS DRT
 - Was transferred and then changed or
 - If school is aware amended tax return was filed with IRS
- May need to reach out to student for reasons why data is different between years

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- Additional disbursements and overpayments
- 2017-18 FAFSA/ISIR – if required correction is for 2017-18 year, school must use EFC from corrected ISIR to award/disburse
- 2016-17 FAFSA/ISIR – if required correction is for 2016-17 year, school must ensure that all awards/disbursements for 2016-17 are using corrected 2016-17 ISIR
- Exception – not required to submit corrections to 2016-17 ISIR if 09/09/17 published deadline for making corrections has passed

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- Unable to resolve
- Until conflicting information is resolved, school may not disburse any additional 2016-17 or 2017-18 Title IV aid
- If unable to resolve school must consider student in overaward status for any need-based 2016-17 Title IV aid that was disbursed
 - except FWS – though no more FWS can be earned

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GEN-16-14: Conflicting Information

- Additional disbursements and overpayments
- Lower EFC: when correction results in lower official 2016-17 EFC, school must disburse any additional 2016-17 aid it determines student is eligible to receive
 - Consistent with late disbursement rules at 34 CFR 668.164(g)
- Higher EFC: when correction results in a higher official 2016-17 EFC, school must determine student's 2016-17 Title IV eligibility based on corrected EFC and may not make any additional 2016-17 disbursements for which student is no longer eligible
 - Overawards may occur

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- Resolving overawards and overpayments
- Title IV Grants and Perkins Loans
 - Adjust subsequent disbursements
 - If not resolved by adjusting subsequent disbursements, student must repay portion disbursed no longer eligible for
 - School is not liable
 - Follow normal overpayment rules and procedures
- Direct Subsidized Loans
 - Does not need to be immediately repaid but instead will be repaid under terms of promissory note
 - No action school must take except to record its determination

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Discussion/Questions?

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fsa.customer.support@ed.gov

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

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

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