

REMOVING BARRIERS TO FINANCIAL AID: GUIDANCE ON VERIFICATION NON-FILING AND FORM W-2

For youth experiencing homelessness, completing the Free Application for Federal Student Aid (FAFSA) is critical in order to access college. Yet they face many barriers to FAFSA completion, including obtaining necessary documentation.

Youth under age 24 who are homeless and unaccompanied must obtain a determination of their dependency status as it pertains to housing circumstances in order to be considered independent, and therefore exempt from the requirement to provide information about parental income. SchoolHouse Connection has [numerous resources](#) to help youth, educators, and service providers understand and obtain this documentation.

In addition to financial aid determinations of unaccompanied homeless youth status, youth also may need to obtain documentation related to their income or tax filing information. This documentation, too, may be a barrier toward a student's education for youth experiencing homelessness, particularly during the pandemic.

The U.S. Department of Education (ED) released additional [guidance](#) in July 2020 that responds to the challenges that many students - especially unaccompanied homeless youth and foster youth - face in obtaining tax documentation for the FAFSA. These students have had difficulty obtaining the Verification of Non-Filing (VNF) and IRS Form W-2. The new ED guidance reminds institutions of other documentation that it is acceptable to complete verification for non-tax filers and extensions filers.

1. Verification of Non-Filing (VNF)

Many unaccompanied homeless youth and foster youth are non-tax filers. However, due to the closure of IRS offices, these youth might face challenges obtaining a VNF. The ED guidance reminds institutions of higher education of their role in removing barriers for these students.

Students must make an attempt to request a VNF from the IRS. The student should go online to [IRS.GOV/GetATRANSCRIPT](https://www.irs.gov/GetATRANSCRIPT). If the student can pass the identity verification, they can request the 2018 taxes. When the search result appears, it will state No search result found and the ribbon will show an attempt to access 2018 taxes.

Alternatively, if students cannot pass the IRS verification of identity, they should call the IRS to request a VNF by message. However, since the IRS is closed, this message may go unresponded.

At this point, the student should then write a personal statement and indicate that they attempted to request a VNF letter, but were unable to pass verification of identity on the IRS website, called the IRS but the office is closed, etc. The student must hand-sign (not print from the computer) and date the letter. This is certification that they attempted to get the VNF, but were unsuccessful.

The student should also include in the statement that they have not filed an income tax return and list the sources of any income, and the amount of income from each source for the applicable tax year. Alternatively, if the student had no income they would need to indicate as such in a personal statement.

2. IRS Form W-2

The institution may also accept a copy of the IRS's approval of an extension beyond the automatic six-month extension for the appropriate tax year or a copy of IRS Form W-2 for each source of employment income received or an equivalent document for the applicable tax year.

To access a IRS Form W-2, the student should go online to [IRS.GOV/GetATRANSCRIPT](https://www.irs.gov/GetATRANSCRIPT). If the student can pass the identity verification, they can request the 2018 Income and Wage Transcript. When the search result appears, it will state No search result Found and the ribbon will show an attempt to access 2018 Wage and Income.

The student can also contact their employer in 2018 to request a copy of W2/1099.

If neither are available, the student should write a personal statement explaining that they have "attempted" to access proof of income and how they attempted to request proof and list the sources of any income, amount of income from each source for the applicable tax year. The student should also meet with their financial aid office for further guidance.

3. Professional Judgement

The Department of Education recognizes that due to the pandemic, many financial aid administrators will increase the number of professional judgment decisions performed. For the 2019-20 and 2020-21 award years, the Department will make appropriate adjustments and will not negatively view increased use of professional judgment or use it as a selection criterion for a program compliance review. However, it is important to note that unaccompanied homeless youth and foster youth determinations are separate from professional judgement, and have their own unique processes, per the [Application and Verification Guide](#). SchoolHouse Connection and the National Association of Student Financial Aid Administrators created this [short resource](#) to help financial aid administrators assist unaccompanied homeless youth to access financial aid during the pandemic.