Conflicting Information

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Agenda

• What is it?
• What ISN’T conflicting information?
• Sources of conflicting information
• What must I do about it?
• What is the timeframe for resolution?
• When to contact the OIG
Conflicting Information - What is it?

§668.16 Standards of administrative capability

(f) Develops and applies an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student’s application for financial aid under Title IV, HEA programs. In determining whether the institution’s system is adequate, the Secretary considers whether the institution obtains and reviews—

(1) All student aid applications, need analysis documents, Statements of Educational Purpose, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each applicant;

(2) Any documents, including any copies of State and Federal income tax returns, that are normally collected by the institution to verify information received from the student or other sources; and

(3) Any other information normally available to the institution regarding a student’s citizenship, previous educational experience, documentation of the student’s social security number, or other factors relating to the student’s eligibility for funds under the Title IV, HEA programs;

Okay, now in ENGLISH please:
Conflicting Information – What is it?

Any information—regardless of the source and regardless of whether the student is selected for verification—obtained by the institution that is disparate, and that could affect a student’s eligibility for Title IV aid.
Conflicting information does not include such things as…

- a household size that differs from the number of exemptions on a tax return;
- dependency under IRS rules vs. ED definition of dependency;
- a roster of candidates for an outside scholarship, as opposed to a list of recipients;
- privacy-protected information, such as information from professional counselors, chaplains, doctors, etc.;
- assumptions made by the Central Processing System; and
- a student who has an expired immigration document but whose secondary confirmation match is successful.

Sources of conflicting information

- Information from the student (usually to the financial aid office)
- Other offices within the institution
- Other institutions
- External sources
- Information from ED
Sources of conflicting information - Information from the student to the FAO

- Unsolicited submission of tax returns, transcripts, or schedules
- Supplemental financial aid applications
- Other information provided by student
- Being proactive: Is the information from a routine business process at the school?

Sources of conflicting information - Other offices within the institution

- Generally occurs when one office is aware but another office is not
- §668.16(b)(3) & (f) requires system to share information within institution (institutional requirement, not just FAO requirement)
- Being proactive: Is the information from a routine business process at the school?
Sources of conflicting information - Other institutions

- Transcripts
- Contact with an office at other institution (not just FAO)
- Information on siblings’ attendance and transfer students
- Being proactive: Is the information from a routine business process at the school?

Sources of conflicting information - External sources

- Scholarships from outside sources
- State Agencies such as Voc. Rehab., WIA, State Scholarship Agencies, etc.
- Tips from outside sources
  - Handling anonymous calls and hearsay vs. documented credible evidence
- Being proactive: Is the information from a routine business process at the school?
Sources of conflicting information - Information from ED

- SARs or ISIRs in general
- Subsequent SARs or ISIRs must be reviewed
  - ISIR is considered to be received when put in institution’s SAIG mailbox
  - Must review, even if earlier transaction was verified
    - Selection for verification by ED or institution (full or single-item)
- EFC or C Flags changed
- New Comment codes or NSLDS changes
- Updates or corrections

Sources of conflicting information - Information from ED—cont’d

- Subsequent SARs or ISIRs
  - If no change in EFC (and no change in C Flag, matches, or NSLDS), no action required
  - If EFC changes and data elements changed were previously verified, no action needed
  - If EFC changes and data not previously verified, must resolve conflict
Sources of conflicting information - Information from ED—cont’d

- Updated NSLDS information
- Postscreenings (usually from subsequent ISIR)
  - Loan limits and C flags
- Transfer Monitoring (Inform, Monitor, and Alert process)
- MRRs and POPs from COD

What must I do about it?

“A school must have an adequate internal system to identify conflicting information and resolve discrepancies.”
What constitutes resolution of conflicting information?

- Resolution is the determination of what is the correct information
- Documentation of resolution IS required
  - May be simply confirmation that an earlier determination is correct, **AND WHY** it is correct
  - Correction of data MAY be required

Designate a **Coordinating official**

- §668.16(b)
  1. A school must designate a capable individual to be the coordinating official
  3. Communicates to the individual designated to be responsible for administering Title IV, HEA programs, all the information received by any institutional office that bears on a student’s eligibility for Title IV, HEA program assistance
What is the timeframe for resolution?

Financial aid office receives potentially conflicting information. → Does it pertain to the current processing year? → Yes → Review documents and resolve any conflicting information.

Has all aid for the period of enrollment been disbursed? → Yes → At disbursement, was all conflicting information resolved? → Yes → Is the student currently enrolled or intending to re-enroll?

No → Review documents and resolve any conflicting information before making any subsequent disbursements, including late or post-withdrawal disbursements.

The school must apply either of the following:
• Resolve the conflict and apply any necessary overaward processes for the current year.
• If the conflicting information includes additional funds, apply any funds received as estimated financial assistance for the subsequent period of enrollment.

No action required. Document student’s file and retain information.

When Should I Contact the Office of the Inspector General?

• § 668.16(g)
• “…refer to the OIG any credible information indicating that an applicant for Title IV aid may have engaged in fraud or other criminal misconduct in connection with his or her application.”

• Examples: false claims of independent student status, false claims of citizenship, use of false identities, forgery of signatures of certifications, and false statements of income
The difference between fraud and a mistake?

**INTENT!**

A *deliberate* distortion of the truth in an attempt to obtain something of value.

If you discover what you believe might be fraud…

1-800-MIS-USED

http://www2.ed.gov/about/offices/list/oig/hotline.html

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