

# Orleans Technical College

## Student Financial Services Policy and Procedures

### **Conflicting Data Policy:**

*The General Provisions of 34 CFR 668.14(f) of the Federal Register requires that Orleans Technical College ensure the consistency of the information obtained from students applying for federal student aid, regardless of the source of that information. Information will be reviewed and discrepancies will be identified and resolved 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. 34 C.F.R. § 668.16(f). All information received must be reconciled with one exception; if the applicant dies during the award year, the College is not required to pursue the resolution of conflicting data.*

*The requirement to resolve conflicting data is separate from the verification requirements and procedures, and supersedes any verification policies. Further, if a discrepancy is discovered after federal aid has been disbursed, it must be reconciled and the student will be required to repay any amount of aid received in excess of his or her eligibility.*

### **Identifying Discrepancies**

Information is gathered from various sources through the College. This information received from different sources may have critical information that, if overlooked, could result in an error with respect to a student's application for Title IV aid.

All departments in the school are required to provide information that could impact the financial aid status of each student applicant. The college's internal imaging system is used by each department to protect and scan forms completed by the students. To adequately identify conflicting information between departments, the Internal Compliance Team will review documents submitted by the following departments:

- Admissions
- Student Financial Services
- Student and Career Services
- Training/Education

Documents submitted will be reviewed for the most common discrepancies such as, but limited to:

- High School Completion Status
- Accuracy of Social Security Number
- Financial Aid History (information from prior institutions)
- Identity/Statement of Educational Purpose

- Citizenship Status
- Household Size
- Marital Status
- Adjusted Gross Income
- Federal Income Tax Paid
- Exemptions Claimed
- Certain Untaxed Income and Benefits Received
- Number of Family Members Enrolled in Postsecondary
- Child Support Paid
- Multiple ISIR transactions with various changes
- Enrollment Status

### **Resolving Conflicting Data**

When conflicting data is identified, the process of resolving the conflicting data is for the Student Financial Service Director to:

- Have a phone conversation with the student
- Send an email to the student requesting additional documents
- Sets an appointment for an in-person meeting
- Identify discrepancies to student
- Request and obtain written explanation of discrepancies
- Request and obtain supporting documents and/or statement confirming accurate information

### **Conflicting Data Timelines**

Orleans Technical College will not award financial aid until the student replies and the conflicting data is resolved. Additionally, if conflicting data is identified after the first disbursement of financial aid funds has been made to the student; the conflicting data must be resolved before any subsequent disbursements will be made.

### **Referring Cases of Suspected Fraud Office of the Inspector General, U.S. Department of Education**

Assessment of data will help eliminate errors, not fraud. If Orleans Technical College has reason to believe the applicant/student is engaged in fraud, the school will provide the information to OIG.

Section 668.16(g) requires an institution to 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. This would include any information which is relevant to the student's eligibility or the amount of the assistance.

**Examples of Fraud:**

False claims of independent student status  
False claims of citizenship  
Use of false identities  
Forgery of signatures of certifications  
False statements of income

Should fraud or abuse be detected or suspected, Orleans staff will report it to the Director of Student Financial Services. The Director will consult with the Campus President and school's legal counsel prior to referring it for investigation to the Office of the Inspector General of the Department of Education or any agency outside the school.

All credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct will be provided to OIG. Fraud is an intent to deceive as opposed to a mistake. In addition we will refer any third-party servicer who may have engaged in fraud, breach of fiduciary responsibility or other illegal conduct involving the FSA Programs.

**OIG Address and Phone Numbers**

Office of Inspector General  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202-1510 1-800-MIS-USED

Email: [oig.hotline@ed.gov](mailto:oig.hotline@ed.gov)

Web: <http://www.ed.gov/about/offices/list/oig/hotline.html>

**Regional Offices Telephone numbers**

Inspector General's Hotline  
Boston, MA (617) 289-0174

Philadelphia, PA (215) 656-6900

Washington, DC (202) 245-6911

OIG referrals

(34CFR 668.16(g))

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