2123 – Title IV Student Aid Fraud

Student Fraud

Institutions are required to refer applicants who are suspected of having engaged in fraud or other criminal misconduct in connection with Title IV programs to the Department of Education's (ED's) Office of Inspector General (OIG). The regulations require only that the institution refer the suspected case of investigation, not that it reaches a firm conclusion about the propriety of the student's conduct.

To identify suspected fraud, Barton has developed and applies an adequate system to identify and resolve discrepancies in the information received from different sources with respect to a student's application for Title IV aid. These areas include the following:

- All student aid applications (e.g., federal, institutional, state, etc.)
- Need analysis documents (e.g., Institutional Student Information Records (ISIRs) and Student Aid Reports (SARs))
- Copies of federal income tax returns
- Information regarding a student's citizenship
- Previous educational experience (e.g., falsified school credential such as a high school diploma)
- Documentation of the student's Social Security Number
- Other factors relating to the student's eligibility for funds under Title IV aid programs (e.g., Selective Service registration compliance)

Barton's financial aid personnel are trained to look for the following:

- Falsified documents or forged signatures on an institutional application, documents submitted for verification of information on the application, or loan promissory notes
- False statements of income
- False states of citizenship
- Use of false or fictitious names or aliases, addresses, or Social Security Numbers, including deliberate use of multiple Social Security Numbers
- False claims of independent status
- Patterns of misreported information from one year to the next

Employee Fraud

Any Barton employee acting in a capacity involving the administration or receipt of Title IV funds suspected to have engaged in fraud or any illegal conduct involving Title IV programs will be reported to Ed's OIG (Office of Inspector General).

Barton has instituted a Student Employment Group that is designed to work collaboratively in the Federal Work Study program. In particular, the group is charged to ensure that no fraudulent activity is involved in the Federal Work Study program.

Last updated: 12-Feb-2008

Referrals

If the school suspects that a student, employee, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to fraudulently obtain federal funds, it must report those suspicions and provide any evidence to Ed's Office of Inspector General (OIG).

The OIG Web site at http://www2.ed.gov/about/offices/list/oig/index.html?src=mr allows the school to:

- Complete a special complaint form on-line
- Call the toll free number (1-800-MIS-USED)
- Call an OIG office in the school's area (a list of offices and telephone numbers are provided)

Reporting

Referrals to OIG will be made by Barton's attorney. The Director of Financial Aid is responsible for informing the Barton's President and Fiscal Officer of any situation in which fraud is suspected at which time the three principals will make the determination to contact the College's legal counsel.

Last updated: 9-Feb-2008

(Based on policy 1125; approved by President on 5/5/08)