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 or IRS tax transcripts
- 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

Students who have been convicted of or have pled nolo contender, or guilty to a crime involving fraud in obtaining Title IV aid are ineligible for additional Title IV aid unless the

student has completed repayment of such assistance to the U.S. Department of Education or the holder of the federal student loan.

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). This includes Barton employees counseling a student on providing false or inaccurate information in order to receive Federal Financial Aid funds.

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 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.

Contact(s): Chief Accreditation Officer and Director of Financial Aid

Related Form(s):

References:

Code of Federal Regulations: 34 CFR 668.16

Relevant Policy or Procedure(s): 1125-Equal Employment Opportunity, Equal Education Opportunity and Affirmative Action

Approved by: President

Date: 5/5/08

Revision(s): 7/19/19 (minor revision)