

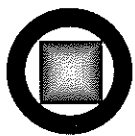
**Region VII
Private Career Colleges & Schools**

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***Administrative Capability and the
Financial Aid Office***

Presented by:
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Administrative Capability and the Financial Aid Office

By Steve Berry
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Consistency of information and conflicting information

- Schools must have a system to identify and resolve all discrepant information anywhere in the school's possession regardless of whether or not the student is selected for verification.
- Conflicting information must be resolved prior to disbursing FSA funds.

Items to be reviewed

- Student aid applications including school applications and enrollment questionnaire's
- MRR'S and POP's from the COD
- All ISIRs received for a student
- All tax returns and account transcripts
- Any other information the school has regarding citizenship, social security number, previous educational experience or other factors relating to the student's eligibility for FSA funds

Must continue to be alert for conflicting information unless

- All aid for the period of enrollment has been disbursed
- At the time of disbursement there was no conflicting information and
- The student is no longer enrolled at the school and is not intending to reenroll
- Student is deceased

Office of the Inspector General (OIG) Referrals

- If school has credible information a FSA applicant provided fraudulent information to obtain FSA funds it must report the student to the OIG.
- Common misconduct includes false claims of:
 - independent status
 - Citizenship status
 - False identity
 - Forgery
 - income

Office of the Inspector General (OIG) Referrals (cont.)

- Fraud is the intent to deceive as opposed to a mistake
- Can also include third party servicers
- Best to check with legal counsel before referring to the IOG
- OIG Phone 1-800-MISUSED

Sources of conflicting information

- Tax returns or schedules
- Federal tax transcripts
- Any information provided by the student
- Supplemental financial aid applications
- Other offices within the school
- State agencies (e.g. Vocational rehab, WIA etc.)
- Tips from outside sources

Sources of conflicting information (cont.)

- Transcripts from other colleges
- SARs or ISIRs
- Verification
- C Flags
- Reject codes
- Comment codes

Examples of Conflicting Information

- Citizenship status
- SSN accuracy
- Default or overpayment status
- Changes in academic status and grade level progression
- COA elements
- Other student financial assistance or resources

Not considered conflict information

- Household size that differs from exemptions on tax return
- IRS vs ED dependency definition
- Roster of candidates for outside scholarship, as opposed to a list of recipients
- Privacy-protected information from chaplains, doctors, professional counselors etc.
- Expired immigration document for student whose secondary confirmation was successful

Other Administrative requirements

- Coordinating Official
- Provide financial aid and entrance\exit counseling
- Adequate staffing
- System of checks and balances
- Debarment of school owners or staff
- Code of conduct for FSA loans
- Incentive compensation prohibition

Required electronic processes

- Use E-App to submit and update eligibility
- Enroll in the SAIG
- FAA access
- COD access
- E-campus based system (FISAP)
- NSLDS access
- EZ audit
- IFAP
- SSCR batch or ad hoc reporting

More Administrative requirements

- Sharing information about delinquent\defaulted loans
- Financial Aid history and transfer monitoring
- Satisfactory academic progress policy
- Provisions for U.S. Armed Forces members and their families