



## **613 POLICY – Conflicting Data**

### **613.1 Statement of Policy**

Redlands Community College complies with all applicable laws and procedures governing distribution of financial aid. The criteria and procedures to be followed in implementing this policy are published in the Procedures section of the Policies and Procedures Manual.

Adopted March 2017



## 613 PROCEDURE – Conflicting Data

### **613.1:1 Discrepant Tax Data**

Redlands Community College expects Financial Aid Administrators (FAAs) to have a fundamental understanding of relevant tax issues that even a layperson with basic tax law information can evaluate. Because conflicting data often involve such information, FAAs must have a fundamental understanding of relevant tax issues that can considerably affect the need analysis. FAAs are obligated to know: (1) whether a person was required to file a tax return, (2) what the correct filing status for a person should be, and (3) that an individual cannot be claimed as an exemption by more than one person. FAAs utilize Publication 17 of the IRS, Your Federal Income Tax, it can be view on the Web at [www.irs.gov](http://www.irs.gov).

### **613.1:2 Resolution of Conflicting Information**

Financial aid will not be disbursed until conflicting information has been resolved. Even if the conflict concerns a previous award year, FAAs will still investigate it. The matter is considered resolved when the FAA has determined which data are correct. FAAs will document the findings and explain why their decision is justified.

- **Applicants selected for verification** – If Redlands Community College has reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate), Redlands Community College requires the applicant to provide adequate documentation to resolve the conflict.
- **Applicants not selected for verification** – Redlands Community College resolves conflicting information regardless of whether or not the applicant was selected for verification. The Financial Aid Office reviews all tax returns provided to the school even if they were not requested. All C Codes on the ISIR are reviewed and resolved by the Financial Aid Office.
- **Other applicant information received by the school** – Redlands Community College has an adequate internal system to identify conflicting information that it may have regardless of the source. Staff in the Registrar’s Office, the Business Office and the Financial Aid Office work closely to ensure information that could impact the financial aid status of each student is provided and reviewed.



### **613.1:3 Discrepancies**

Procedures to identify and resolve discrepancies in the information that the College receives from different sources with respect to a student's application for Title IV aid are as follows:

- Redlands Community College identifies all student aid applications, need analysis documents, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each aid applicant. Redlands Community College collects IRS Tax Return Transcripts for tax filers who did not utilize the IRS DRT (Data Retrieval Tool) within the FAFSA. For non-filers, the student and/or parent will mark their non-filing status on the verification worksheet and W-2 forms will be collected. In certain cases, when deemed necessary, a "statement of non-filing status" will be requested from a student or parent. That form is requested from the IRS website.
- The Financial Aid Office uses a verification worksheet to retrieve data, dependent on the student verification tracking group. If conflicting information can be determined from the worksheet, corrections will be made to remedy the incorrect data. At certain times, more information may be requested, and the student can turn in verification from an outside source to document the data element before corrections can be made to rectify the incorrect information. All conflicting information will be reviewed and resolved before the student file is considered complete and any awards are made.
- The Financial Aid Office will review all ISIRS, even if the previous transaction was reviewed. All C flags and comment codes will be reviewed. All NSLDS data on the ISIR will be reviewed for default, overpayment, and loan limit status. Selective Service and Social Security match information will be reviewed.
- If the Financial Aid Office suspects that a student, or other individual, has intentionally misrepresented information or altered documentation to fraudulently obtain federal financial aid funds, the office can report its suspicions, and will provide the evidence, to the Office of Inspector General, U.S. Department of Education, for review. Suspicious activities will be reported directly to the Dallas Office of the Inspector General, U.S. Department of Education.
- The Office of Financial Aid at Redlands Community College will report to the Office of Inspector General all instances of suspected fraud where a financial aid applicant, employee, or other individual has misrepresented and/or altered documentation for the purpose of increasing aid eligibility or fraudulently obtaining federal funds.



**613.1:4 Federal Regulation**

This policy and procedure was created and is maintained to be in compliance with Federal regulation 34 CFR §668.16(f) and §668.54(a)(3).

Adopted March 2017

Revised September 2018