



The University of Mississippi

Office of Financial Aid

University, MS 38677

Phone: (800) 891- 4596 Fax: (662) 915-1164

Policy Name: Conflicting Information

Purpose: This document contains the Office of Financial Aid's current policies and procedures for resolving conflicting information related to a student's application and/or eligibility for Federal Title IV aid.

Disclaimer: This policy is subject to change, without notice, in order to comply with administrative and regulatory requirements.

Policy Contents:

- 13.0 Resolving Conflicting Information Overview
- 13.1 Resolving Conflicting Information Procedures
 - 13.1.1 C Flags
 - 13.1.2 Subsequent FAFSA loads (Previously Awarded, Already Verified reports)
 - 13.1.3 Verification
 - 13.1.4 Review of FAFSA Data and Professional Judgment
 - 13.1.5 Documentation/information Received by Other UM Departments
 - 13.1.6 Rejected SARs
- 13.2 Reporting Fraud and Abuse
- 13.3 Conflicting Information Examples with Solutions

Definitions and Terms:

COD – Common Origination Database
CPS – Central Processing System (U.S. Department of Education)
DHS/USCIS – Department of Homeland Security/U.S. Citizenship and Immigration Services
DOE – Department of Education
EFC – Expected Family Contribution
FAFSA – Free Application for Federal Student Aid
NSLDS – National Student Loan Data System
OFA – Office of Financial Aid
OIG – Office of Inspector General
SAR – Student Aid Report
SS – Selective Service
SSA – Social Security Administration
UM – University of Mississippi
VA – Veteran's Affairs

Part 13.0**Resolving Conflicting Information Overview**

Each year, students apply for Federal Title IV aid (as well as need-based state and institutional aid) using the FAFSA. Any conflicting information that is identified by the OFA regarding student eligibility and/or FAFSA data (regardless of the source) must be resolved before aid can be delivered.

Part 13.1**Resolving Conflicting Information Procedures**

The OFA has implemented multiple systems checks to electronically recognize data discrepancies that affect eligibility. Automated rules called “diagnostics” will then prompt the staff to review a student’s record. In addition, the OFA may uncover conflicting information through manual review of data and documentation.

The primary avenues for finding conflicting information include, but are not limited to, the following review processes:

- C Flags on the “processed” FAFSA (also known as the SAR)
- Subsequent FAFSA loads (Already Verified, Previously Awarded reports)
- Verification
- Comment Codes 400/401
- IRS Request Errors
- Professional Judgment
- Documentation/information received by other UM departments
- Rejected FAFSAs

Part 13.1.1**C Flags**

In some instances, a “C Flag” is assigned by DOE to a FAFSA as an indication that something on the student’s FAFSA record must be corrected or confirmed before aid can be awarded. The OFA detects C Flags on student FAFSAs through the financial aid database system (ProSAM). Resolution for C Flags is conducted through the review of system-generated reports corresponding with each C Flag category and corresponding comment code.

Issues that generate a “C Flag” include but are not limited to:

- Lack of Selective Service registration, if required
- Immigration or eligible non-citizen status not confirmed by DHS/USCIS
- Citizenship status not confirmed by the SSA
- Social Security number mismatch
- Veteran status not confirmed
- Unusual Enrollment History

- A prior drug conviction
- Erroneous tax/income information as detected by CPS

When reviewing conflicting data, the OFA uses information obtained from the student, other UM departments (e.g., Veterans and Military Services to verify student veteran/active duty status), or other agencies (i.e., DHS/USCIS, SSA, SS, NSLDS, COD, etc.) to resolve any discrepancies.

A full listing of SAR Comment Codes that generate C Flags may be obtained through the following DOE website (under “SAR Comment Codes and Text”):

<https://fsadownload.ed.gov/docsStudentAidGateway.htm>

Part 13.1.2

Subsequent FAFSA Loads (Previously Awarded, Already Verified)

The OFA loads all subsequent FAFSAs (provided the FAFSA includes the UM school code) when corrections have been made by the student or parent, the OFA, another institution, or the CPS. The financial aid system generates a status of “previously awarded” or “already verified” in the student’s financial aid database record if financial aid was awarded (for “previously awarded”) or if verification was completed (for “already verified”) prior to the new FAFSA being received.

The system also generates a report that is regularly reviewed by OFA staff to confirm the accuracy of financial aid awarding when “previously awarded” or “already verified” flags appear in a student’s record. The review of these reports assists in resolving conflicting information when comparing different versions of the FAFSA. (Also see policy “12.0 FAFSA Processing”).

For students selected for verification: If a student had previously completed verification, and a subsequent change occurs to the FAFSA, the OFA will review the new information to determine its accuracy. If the changes do not affect either the student’s eligibility OR prior verification data entry (which had already been approved by the OFA), no action is taken. If changes do affect the student’s eligibility and/or previous verification data entry, the OFA will re-verify the student’s FAFSA.

If a subsequent FAFSA is selected for verification by the federal processor despite previous FAFSA records being exempt from verification, the student is then required to complete verification in order to receive or retain any federal or need-based aid. If the award package changes due to the verification results, OR the student fails to complete verification, paybacks on previously awarded aid will be made. If the new FAFSA is received by the OFA after the student has ceased enrollment at UM, it may be determined in some cases that paybacks may not be necessary.

For students not selected for verification: The OFA may require clarification or documentation justifying any changes that were made to a subsequent FAFSA if the OFA determines that the changes affect a student’s eligibility or current award status.

Part 13.1.3**Verification**

The OFA completes verification of selected student FAFSAs by comparing information from the student's FAFSA with other required documentation and making any FAFSA changes on the student's behalf as necessary (c.f., policy "3.5 Verification"). During the verification process, the OFA might determine conflicting information that includes but is not limited to:

- Erroneous FAFSA tax/income information
- Missing tax/income information
- Student/parent tax-filing status
- Student/parent marital status
- Incorrect or missing cash, savings, asset information

Part 13.1.4**Review of FAFSA Data and Professional Judgment**

The OFA also reserves the right to request reasonable documentation to verify any FAFSA information related to student eligibility. The need to resolve conflicting information may also occur through the professional judgment review process (c.f., policy "3.6.B Expected Family Contribution and Dependency Professional Judgments and Reviews") which include but are not limited to:

- Dependency Override
- Emancipated Minor
- Homeless /Risk of Being Homeless
- Legal Guardianship
- Orphan / Ward of the Court / Foster Care
- Proof of Legal Dependents
- Adjustment to EFC
- Parent Attending College

During the professional judgment review process, the OFA might determine conflicting information including but not limited to:

- Errors regarding household information
- Missing or erroneous untaxed income information (i.e., if a student/parent receives child support but fails to include this in the untaxed income section of the FAFSA)
- Incorrect claim about dependency status
- Missing or incorrect asset/investment information

Part 13.1.5**Documentation/information Received by Other UM Departments**

The OFA often works in conjunction with other UM departments (e.g., Admissions, Bursar, Graduate School, Registrar, etc.) and agencies (e.g., COD, NSLDS) to review student information and resolve data conflicts. Examples of these interactions include:

- Admissions (confirmation that a final high school diploma is received)
- Veteran's and Military Services (review and approval of military documents to determine student veteran/active duty status)
- Bursar (reporting of scholarship checks received directly)
- Registrar (reporting changes in student enrollment)

Part 13.1.6**Rejected FAFSA**

A rejected FAFSA contains missing or erroneous information. As a result, the federal processor is unable to calculate the Expected Family Contribution. A rejected FAFSA cannot be resolved at the school level only; corrections must be submitted to the federal processor in order to resolve the rejected status.

Issues that generate a rejected FAFSA include but are not limited to:

- Missing parent information for a student considered to be dependent
- Missing signatures on the FAFSA
- Inconsistencies between certain tax and adjusted gross income amounts

Part 13.2**Reporting Fraud and Abuse**

Fraud is the intent to deceive, as opposed to a mistake. If the OFA suspects that a student, employee, or other individual has misreported information or altered documentation to fraudulently obtain financial aid, the OFA Director will investigate. As appropriate, the Director may consult with the school's legal counsel or local law enforcement.

Common misconduct includes but is not limited to false claims of independent student status, false claims of citizenship, use of false identities, forgery of signatures of certifications, and false statements of income.

Any credible information indicating that an applicant for federal student aid may have engaged in fraud or other criminal misconduct in connection with his or her application should be referred to the U.S. Department of Education's Office of Inspector General. In addition, the OFA will refer any third-party service provider who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving Federal

Student Aid programs. The OFA will cooperate with subsequent investigations by providing all information relevant to the case(s).

Office of Inspector General Contact Information:

U.S. Department of Education

400 Maryland Avenue, SW

Washington, DC 20202-1500

1-800-MIS-USED

E-mail: oig.hotline@ed.gov

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

Part 13.3

Conflicting Information Examples with Solutions

The chart below includes, but is not limited to, certain examples of conflicting information and solutions:

Office	Topic	Conflicting Information Example	Solution
Registrar	FAFSA	Social Security number reported on FAFSA does not match with information included on admissions application or vice versa, or student neglected to include Social Security number on Admissions application which prevents FAFSA from loading to financial aid database.	Student should submit copy of Social Security card to the Registrar to correct Social Security number in student database record, or student will need to correct FAFSA information.
Bursar	Scholarship	The Bursar's Office receives a scholarship check for an enrolled student.	Bursar's Office must notify the OFA to ensure the award is correctly reported on student's financial aid package.
Financial Aid	FAFSA/ Verification	Parent or student indicated on the FAFSA, and by signing the verification worksheet, that they will not file an IRS tax return. The OFA has reason to believe they are required to file a return because the amount of reported income equals or exceeds the amount required to file a tax return as indicated by instructions provided by IRS.	Inform student/parent of IRS requirement and explain verification cannot be completed until tax return is filed.

Office	Topic	Conflicting Information Example	Solution
Financial Aid	FAFSA/ Verification	Mismatch between parent tax filing status and parent marital status when comparing FAFSA and verification worksheet to IRS tax information.	Request parent submit a written statement with explanation. After review of written statement, may require correction of FAFSA data, revision of verification worksheet household information, or correction of parent tax return.
Financial Aid	FAFSA/ Verification	Parental information on verification worksheet differs from that reported on the student's FAFSA (i.e., parent/step-parent information is included on the FAFSA but not the same on verification worksheet, or vice versa).	Request parent submit written statement with explanation. After review of written statement, may require correction of FAFSA data, revision of verification worksheet household information, or correction of parent tax return (if statement implies conflicting marital/tax filing status).
Financial Aid	FAFSA/ Verification	A student was not selected for verification, but the OFA has student (and/or parent) tax information on file which indicates conflicting information with FAFSA.	Contact student (and/or parent) requesting FAFSA corrections, or the OFA may institutionally select student for verification.
Financial Aid	FAFSA/ Verification	The OFA has reason to believe that grandparent information (or other family member) is included in the parent information section of the FAFSA and household information section of verification worksheet.	The OFA would seek clarification from student if parent information is incorrect and determine if student should correct FAFSA to include legal parent (biological or adoptive) information, or request a professional judgment review for dependency status change (i.e., Dependency Override).

Office	Topic	Conflicting Information Example	Solution
Financial Aid	FAFSA/ Verification	The OFA has reason to believe that incorrect parent information is on FAFSA. Example: legal parents divorced and student lists father on FAFSA because father claimed student on father's tax return and offers financial support for education, but student lives majority of the year with mother.	The OFA would advise student to correct FAFSA to include mother's information (and step-parent if mother is re-married).
Financial Aid	FAFSA/ Verification (Comment Codes 400 and 401)	After a student or parent used the IRS Data Retrieval Tool to transfer IRS data to the FAFSA, it was determined there were errors in some of the information related to the student or parent adjusted gross income, additional financial information, or untaxed income amounts.	The OFA must review information and request additional documentation from student/parent to correct any erroneous information on the FAFSA, and if necessary, adjust student awarding if eligibility changes.
Financial Aid	FAFSA/ Verification	After a student or parent used the IRS Data Retrieval Tool to transfer IRS data to the FAFSA, but after submission of the FAFSA a subsequent change made the student or parent ineligible to use the IRS Data Retrieval Tool.	The OFA must contact the applicant or parent, as applicable, to determine if the income tax return information that was transferred into the FAFSA form is correct given the changes the applicant or parent made to IRS DRT eligibility criteria, and make any necessary changes to the applicant's FAFSA as needed, and if necessary, adjust student awarding if eligibility changes.
Financial Aid	FAFSA/ Verification	After a student or parent used the IRS Data Retrieval Tool to transfer IRS data to the FAFSA, but after doing so the IRS determined the student or parent filed an amended tax return (the income and tax information transferred to the FAFSA will be original tax data, not the amended tax data).	The OFA must contact the applicant or parent, as applicable, and make any necessary changes to the FAFSA, regardless of whether the FAFSA was required to be verified, and if necessary, adjust student awarding if eligibility changes.

Office	Topic	Conflicting Information Example	Solution
Financial Aid	Federal Aid Eligibility	Potential Overpayment (POP) Report received from COD states that a student was awarded over 100% of Pell award for academic year.	Student may have attended more than one school during academic year. An OFA administrator would need to check COD and determine what institution over-awarded the student. The student and/or that school would be asked to resolve the percentage of Pell that exceeds the 100% (maximum award) via a payback.
Financial Aid	FAFSA Reject Code	Student's EFC is not calculated because of incorrect or lacking information on FAFSA (i.e., lacking parent information, lacking student/parent signatures, taxes paid equal to/greater than Adjusted Gross Income amount).	Student/parent must update FAFSA with appropriate information. In some cases, when parent information is missing from a dependent student's FAFSA, student may request a professional judgment review to change dependency status (i.e., dependency override).
Financial Aid	C Flags	The OFA is unable to award student federal aid (i.e., loan default, citizenship mismatch, male student not registered with Selective Service).	The OFA requests and reviews appropriate documentation (based on specific situation) before awarding federal aid.

Office	Topic	Conflicting Information Example	Solution
Financial Aid	Previously Awarded	Student not selected for verification, is awarded federal aid, and aid disbursed. FAFSA corrections (by student/parent or other institution) made after aid awarded/dispensed.	The OFA reviews student Pell eligibility, prior degree status, dependency status, loan limit status and compares this to student's financial aid packaging. The OFA may make adjustments to financial aid packaging if eligibility changes. In some cases, the OFA will review subsequent FAFSA information and request additional documentation/clarification of any erroneous information in order to resolve any discrepancies.
Financial Aid	Dependency Status	Student is younger than age 24, is not considered a veteran and either knowingly or unknowingly selects information on the FAFSA that indicates independent status.	The OFA may require submission of supporting documentation (through a professional judgment review) to support/justify student's independent status. If documentation supports/justifies student's independent status as approved by the OFA, student will be considered independent and awarded as such. If the OFA does not approve claim of independent status, student will need to correct FAFSA info to include parent information. If student knowingly submitted falsified information (on FAFSA or in written form for professional judgment review), and this is confirmed by the OFA, the OFA has grounds to report student to the OIG.

Office	Topic	Conflicting Information Example	Solution
Financial Aid	Forged Signatures	Student forges another person's signature on any financial aid document.	If suspected by the OFA, the OFA has grounds to report student to OIG.
Financial Aid	Forged Signature (PLUS application)	Student signs as parent or endorser on Federal Direct PLUS loan.	If suspected by the OFA, the OFA has grounds to report student to OIG. If confirmed after aid awarded and disbursed, the OFA administers payback on loan.
Financial Aid	Unusual Enrollment	Review of student's previous enrollment indicates missing transcript information.	The OFA requests student submit all official transcripts to our school before resolving unusual enrollment status. In some cases, Registrar's office may administer holds (i.e., preventing future enrollment, transcript release) until all appropriate documentation received.
Financial Aid	Unusual Enrollment	Review of student's previous enrollment indicates student did not earn academic credit at a previous institution where student was awarded Pell grant.	The OFA requires student to submit documentation of why student failed to earn academic credit in order to determine: 1) if documentation supports reasons given by student for student's failure to earn credit; and 2) student did not enroll only to receive credit balance funds. The OFA may authorize continued Pell eligibility based on review and approval of documentation, or deny continued eligibility (student has right to appeal decision).

Office	Topic	Conflicting Information Example	Solution
Graduate School	Enrollment Hours	A graduate student, who is considered at full-time enrollment, is taking both graduate and undergraduate level courses. However, the OFA will not disburse aid based on full-time enrollment because student's course load includes undergraduate courses.	Before the OFA can award and disburse aid based on student's enrollment status, the student must have written documentation from the academic department stating that undergraduate courses are required for the graduate degree. Otherwise the class is ignored in the enrollment level.
Registrar	Registration Status	Student re-enrolls with the school and is registered as a non-degree seeking student, but informs the OFA he/she would be degree-seeking and able to receive federal financial aid.	In many situations, the student needs to speak to the academic dean of his/her academic department. However, sometimes the Registrar's Office can resolve issue. Once student is classified as degree-seeking, student is eligible to receive federal financial aid.
Registrar	FAFSA	Date of Birth (DOB) reported on FAFSA does not match with information in university or financial aid database systems, or vice versa.	If DOB is accurate on FAFSA, student should take steps to correct DOB in university/financial aid databases (i.e., submit copy of Driver's License or documentation with correct DOB) through Registrar's office. Or, if DOB is incorrect on FAFSA, the OFA would advise student to correct FAFSA.