# Section 15: Title IV Fraud

## 15.1 Student Fraud

Policies

WCC will refer applicants who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the U.S. Department of Education's Office of Inspector General (OIG).

Fraud is the willful misrepresentation or falsification of information for the purpose of securing financial aid that the individual is not eligible for or not eligible to the extent received.

All financial aid staff are responsible for detecting and reporting fraud. An indication of fraud is when Financial Aid is applied for, received or not spent for its intended purpose, generally through theft, misappropriation or false statements. <u>Procedures</u>

Title IV fraud can take many forms, including but not limited to the following:

- Falsified documents or forged signatures on an application, verification documents, loan promissory notes, or any other documents submitted to the financial aid office
- · False statements of income
- False statements of citizenship
- Use of false or fictitious names or aliases, addresses, or SSNs, including the deliberate use of multiple SSNs
- False claims of independent status
- Patterns of misreported information from one year to the next

If, in the financial aid administrator's judgment, the applicant and their family have provided a fraudulent application or documentation, it must be reported immediately to the Financial Aid Director.

The Director will consult with the school's administration and/or legal counsel prior to referring it for investigation to the Office of the Inspector General of the Department of Education or any agency outside the school. All credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct will be provided. Fraud is an intent to deceive as opposed to a mistake.

OIG Address and Phone Numbers Office of Inspector General U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-1510

Tel:1-800-MIS-USED E-mail: oig.hotline@ed.gov Website: http://www.ed.gov/about/offices/list/oig/hotline.htmlRegional Office Telephone Number: Long Beach, CA (562) 980-4141

## 15.2 Institutional and Third-Party Fraud

#### Policies

WCC will refer employees or services who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the U.S. Department of Education's Office of Inspector General (OIG). All financial aid staff are responsible for detecting and reporting fraud.

Examples of institutional fraud include:

• Disbursement or authorization of Title IV funds to an ineligible student

• Payment of any commission, bonus or other incentive payment based in any part, directly or indirectly, upon success in securing enrollments or the award of financial aid to any person or entity engaged in any student recruitment or admission activity or in making decisions regarding the awarding of Title IV federal student aid program funds

## Procedures

Should fraud or abuse be detected or suspected, report it to the Director of the Financial Aid Office. The Director will consult with the school's administration and/or legal counsel prior to referring it for investigation to the Office of the Inspector General of the Department of Education or any agency outside the school. We will refer any third party servicer who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving the FSA Programs.

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## 15.3 Referrals

#### Policies

WCC will report all suspected cases of fraud by students, employees or other individuals to the Department of Education's Office of Inspector General. The Financial Aid Director will work with administration and/or legal counsel to make the referrals.

#### **Procedures**

General cases of fraud can be reported through the OIG: OIG Address and Phone Numbers Office of Inspector General U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-1510

Tel:1-800-MIS-USED E-mail: oig.hotline@ed.gov Website: http://www.ed.gov/about/offices/list/oig/hotline.htmlRegional Office Telephone Number: Long Beach, CA (562) 980-4141

Suspected fraud rings at schools should be submitted through the encrypted complaint web portal at https://oighotlineportal.ed.gov.