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.

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Definitions and Terms:

COD – Common Origination Database
CPS – Central Processing System (U.S. Department of Education)
DHS – Department of Homeland Security
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
USCIS – United States Citizenship and Immigration Services
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
- Professional Judgment

Part 13.1.1 C Flags

A “C Flag” is assigned by the U.S. Department of Education to a FAFSA as an indication that something on the student’s 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. A full listing of SAR Comment Codes that generate C Flags may be obtained through: https://www.fsadownload.ed.gov/SARCommentCodes1415.htm

When reviewing conflicting information for specific categories of C codes (i.e., Selective Service, DHS Match, SSA and Citizenship Status, Student Social Security Number Match, VA Status Match, NSLDS, Unusual Enrollment, Drug Conviction), the OFA uses information obtained from student, other university offices/administrators (i.e., Veterans Affairs Coordinator to verify student veteran/active duty status), or other agencies (i.e., DHS, USCIS, SSA, SS, NSLDS, COD, etc.) to resolve any conflicting information.
Below is a chart of the SAR C Codes for 2014-15:

**SAR C Code Changes**

The SAR C code is set on a student’s record based on his or her eligibility conditions. The following is a complete list of 2014-2015 comments that are associated with the SAR C code:


**Note:** There are no changes to comments associated with the SAR C code for 2014-2015.

Comments that generate the C-Flag are arranged by the areas that the comments are associated with:

- **Selective Service Match:** 30, 33, and 57
- **DHS Match:** 46, 105, 109, 141, 142, and 144
- **Social Security Administration Citizenship Status:** 146
- **Student’s Social Security Number Match:** 63 and 64
- **Veterans Affairs Status Match:** 162, 173, and 180
  - **Potential Pell Overpayment:** 20, 38, 39, 41, 42, 43, 346, and 347
  - **Potential FSEOG Overpayment:** 10, 65, 66, 67, 77, and 79
  - **Potential Perkins Overpayment:** 86, 90, 100, 101, 102, and 107
  - **Potential ACG Overpayment:** 240, 241, 242, 243, 244, and 246
  - **Potential National SMART Grant Overpayment:** 261, 262, 263, 264, 265, and 266
  - **Potential TEACH Grant Overpayment:** 289, 290, 291, 292, 293, and 294
  - **Potential Iraq and Afghanistan Service Grant Overpayment:** 309, 310, 311, 312, 313, and 314
  - **Unusual Enrollment History:** 359 and 360
- **Responses to Question 23/Drug Conviction:** 53, 54, 56, and 58

**Note:** In rare cases, the C-Flag is provided on an ISIR/SAR without a corresponding comment. This happens only if the applicant receives an excessive number of comments (including C-Flag comments) and some of the comments must be suppressed so that a SAR/ISIR can be generated.
Part 13.1.2 Subsequent FAFSA Loads (Previously Awarded, Already Verified)

The OFA loads all subsequent FAFSAs (provided the FAFSA includes The University of Mississippi school code) when corrections have been made by the applicant (student/parent), the OFA, another institution, or the CPS. The financial aid system generates a status of “previously awarded” or “already verified” if these processes occurred 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 versions of the FAFSA being exempted, the OFA requires the student to complete verification in order to receive or retain any federal or need-based aid. If the award package changes due to the results of verification, OR students fail to complete verification, paybacks on previously awarded aid will be made. However, if the new FAFSA is received by the OFA after the student has ceased enrolled at the University of Mississippi, no payback processing will be instituted.

**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 package.

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. (Also see policy “3.5 Verification”.)
The OFA also reserves the right to request reasonable documentation to verify any FAFSA information related to student eligibility. Resolving conflicting information may also occur through the process of professional judgment reviews (also see 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

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

- Admissions (confirmation that high school diploma is received)
- Center for Student Success/First Year Experience, VA Coordinator (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)
The chart below includes, but is not limited to, certain examples of conflicting information and solutions:

<table>
<thead>
<tr>
<th>Office</th>
<th>Topic</th>
<th>Conflicting Information Example</th>
<th>Solution</th>
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<tbody>
<tr>
<td>Admissions</td>
<td>FAFSA</td>
<td>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.</td>
<td>Student should submit copy of Social Security card to Office of Admissions to correct admissions application, or student will need to correct FAFSA information.</td>
</tr>
<tr>
<td>Bursar</td>
<td>Scholarship</td>
<td>The Bursar's Office receives a scholarship check for an enrolled student.</td>
<td>Bursar's Office must notify the OFA to ensure the award is correctly reported on student's financial aid package.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>FAFSA/ Verification</td>
<td>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.</td>
<td>Inform student/parent of IRS requirement and explain verification cannot be completed until tax return is filed.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>FAFSA/ Verification</td>
<td>Mismatch between parent tax filing status and parent marital status when comparing FAFSA and verification worksheet to IRS tax information.</td>
<td>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.</td>
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<tr>
<td>Financial Aid</td>
<td>FAFSA/ Verification</td>
<td>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).</td>
<td>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).</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>FAFSA/ Verification</td>
<td>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.</td>
<td>Contact student (and/or parent) requesting FAFSA corrections, or the OFA may institutionally select student for verification.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>FAFSA/ Verification</td>
<td>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.</td>
<td>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).</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>FAFSA/ Verification</td>
<td>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.</td>
<td>The OFA would advise student to correct FAFSA to include mother’s information (and step-parent if mother is re-married).</td>
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<tr>
<td>Financial Aid</td>
<td>Federal Aid Eligibility</td>
<td>Report received from COD states that a student was awarded over 100% of Pell award for academic year.</td>
<td>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.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>FAFSA Reject Code</td>
<td>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).</td>
<td>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).</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>C Flags</td>
<td>The OFA is unable to award student federal aid (i.e., loan default, citizenship mismatch, male student not registered with Selective Service).</td>
<td>The OFA requests and reviews appropriate documentation (based on specific situation) before awarding federal aid.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>Already Verified</td>
<td>Student completes verification at our school, is awarded federal aid, and aid disbursed. FAFSA corrections (by student/parent or other institution) made after verification and aid awarded/disbursed.</td>
<td>The OFA will review subsequent FAFSA information and re-verify FAFSA, or request additional documentation/clarification of any erroneous information in order to resolve any discrepancies.</td>
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<tr>
<td>Financial Aid</td>
<td>Previously Awarded</td>
<td>Student not selected for verification, is awarded federal aid, and aid disbursed. FAFSA corrections (by student/parent or other institution) made after aid awarded/disbursed.</td>
<td>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.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>Dependency Status</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>Financial Aid</td>
<td>Forged Signatures</td>
<td>Student forges another person's signature on any financial aid document.</td>
<td>If suspected by the OFA, the OFA has grounds to report student to OIG.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>Forged Signature (PLUS application)</td>
<td>Student signs as parent or endorser on Federal Direct PLUS loan.</td>
<td>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.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>Unusual Enrollment</td>
<td>Review of student's previous enrollment indicates missing transcript information.</td>
<td>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.</td>
</tr>
<tr>
<td>Financial Aid</td>
<td>Unusual Enrollment</td>
<td>Review of student's previous enrollment indicates student did not earn academic credit at a previous institution where student was awarded Pell grant.</td>
<td>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).</td>
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<td>Graduate School</td>
<td>Enrollment Hours</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>Registrar</td>
<td>Registration Status</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>Registrar</td>
<td>FAFSA</td>
<td>Date of Birth (DOB) reported on FAFSA does not match with information in university or financial aid database systems, or vice versa.</td>
<td>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.</td>
</tr>
</tbody>
</table>
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:**
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Washington, DC 20202-1500  
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E-mail: oig.hotline@ed.gov  
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