

Schools must have an adequate system to identify and resolve discrepancies in the information that the school receives from different sources with respect to a student's application for financial aid under the Title IV, HEA programs. Use the information in this section to help you develop your procedures for resolving conflicting data.

Resolving Conflicting Data:

Your school's procedures must ensure that you resolve conflicting data for your applicants as follows:

- **Applicants selected for verification** – If the school 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), you must require the applicant to provide adequate documentation to resolve the conflict.
- **Applicants not selected for verification** – the school must resolve conflicting information regardless of whether or not the applicant was selected for verification. The financial aid office must review all tax returns provided to the school even if they were not requested. All C Codes on the ISIR must be reviewed and resolved by the financial aid office.
- **Other applicant information received by the school** – The school must have an adequate internal system to identify conflicting information that it may have regardless of the source. The office lead for each office are required to provide information that could impact the financial aid status of each student applicant e.g. **(Admissions Office:** High School Diploma, **Fiscal Office:** Report outside awards, **Graduate Aid Office:** Report outside awards, **Registrar:** Report changes in enrollment, **FWS Office:** Report FWS earning in a calendar year, **NSLDS:** Review financial aid history, (e.g. review aid received from prior colleges attended).

In addition, the following charts provide examples of conflicting data to assist you in the development of your own procedures.

The charts below are available by selecting the link:
<http://ifap.ed.gov/gadocs/FSAVeriModule/activity1verif.doc>

Good practices vs. what is required



Chart A provides examples of issues that are considered **Conflicting Data**. Although the chart is designed to be extensive, it is not to be construed as an all-inclusive list. The chart is provided for information only and has been developed to help you review your policies and procedures.

(Important) A critical piece of information that, if overlooked, could result in an error.



Chart B provides examples of issues not considered Conflicting Data, but would be a good practice to consider. The chart is provided for information only and has been developed to help you review your policies and procedures.

(Good Practice Suggestion)

Chart A: Examples of issues considered Conflicting Data

- A student not selected for verification, the tax return is on file and information conflicts with items on the FAFSA.
- 1040 shows parent single head of household and the FAFSA/ISIR shows the same person as married.
- Parent or student report on their FAFSA and signed a verification worksheet that they will not file an IRS 1040. You have reason to believe that they would have been required to file a U.S. Income Tax Return, as the amount of reported income is greater than or equal to the minimum amount required to file as indicated in the instructions provided on the 1040.
- Statements or information that suggest that the copy of the Income Tax Return you received is not the return actually filed with the IRS.
- School receives Profile from CSS. Student reports a specific amount in untaxed income; FAFSA reports a different amount (If the school receives the CSS Profile, it must ensure that information contained there does not conflict with other documents received by the school).
- Veterans Affairs (VA) benefits verified by the certifying official in the Registrar's Office don't match the FAFSA. (To resolve conflict, can rely on certifying official).
- Admissions information received impacts student eligibility (i.e., student accepted into a non degree program, student received scholarship from high school, etc.)
- The Student Academic Progress or Enrollment Status on file in the Financial Aid Office doesn't agree with the information from the Registrar's Office.



This is a good practice. However, if you choose to include these examples, you must follow them consistently.

(Good Practice Suggestion)

Chart B: Examples of issues not considered Conflicting Data, but would be a good practice to consider for review

- Assets reported on the FAFSA are \$0 or low but significant interest and dividend income or capital gains are reported on the U.S. Income Tax Return.
- \$0 income reported with no explanation as to how the student/parent/family can live on \$0 income (Your institution may want to consider developing an expense vs. resource form to review \$0 to low income reporting for the Calendar Year January–December).
- Address reported by student/parent (i.e., if parents are divorced and the address on the student's tax return does not match the address of the custodial parent's tax return). Or the address doesn't match the state of residence as listed on the FAFSA. (Your institution may want to consider obtaining a written explanation to determine residency).
- If the student or parents reported business/farm net worth but didn't file a schedule C or Form 1120 or just didn't supply it to the school (Your institution may want to consider requesting additional documentation from the student or parent).
- Box 14 information from W-2 (Determine if the dollars represented are untaxed income not previously reported).
- Always have the ability to ask for whatever information you need any time that you think there is a problem.

Identify person(s) responsible for coordinating both Federal and non-federal aid at your institution.

- Provide procedure as to how Federal and non-Federal aid is identified and processed through the financial aid office.

Provide procedure to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for Title IV aid.

- Identify all student aid applications, need analysis documents, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each aid applicant. Provide a description of all documents, including any copies of State and Federal income tax returns that are normally collected.
- Include a description of how the institution verifies information received from the student or other sources.
- Include procedures concerning the coordination of any other information normally available to the institution regarding a student's citizenship, previous educational experience (NSLDS), documentation of the student's social security number, or other factors relating to the student's eligibility for Title IV Aid (e.g. coordinating outside aid received by various offices on campus).
- Include procedures to refer to the Office of the Inspector General of the Department of Education for investigation any credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct.
- Include any credible information indicating that any employee, third-party servicer, or other agent of the school , who acts in a capacity involving the administration of Title IV, HEA programs, or the receipt of funds under those programs may have engaged in fraud, misrepresentation, conversion or breach of fiduciary responsibility or other illegal conduct involving the Title IV, HEA programs.