

# Pell Runners and Other Fraud Group Characteristics

If you or your office suspect a file of looking a little off, paying close attention to these common characteristics can help reinforce your suspicion and help direct you to complete further research.

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- Student is an out of state resident and is enrolled in all online courses.
    - Typically but not always, these students will be enrolled in courses that start after the full semester courses have started to apply urgency to their cause.
  - Student has attended multiple schools but do not supply transcripts showing grades or submits multiple letters of non-enrollment.
    - This can be verified by confirming enrollment history with NSLDS and NSC.
  - Student has a large loan balance without having obtained a degree or certificate.
  - Student is constantly/consistently in contact via email and phone 2-3 weeks prior to courses starting after filing a late FAFSA.
    - Additionally, these students will seem to have knowledge about financial aid and be well-versed in Financial Aid processes and terms that are not consistent with a first-time, first-year freshman.
  - Tax return, tax return transcript, or verification of non-filing appears to have been copied or tampered with.
  - Student indicates round numbers like \$0, \$500, or \$1,000 for income.
  - Student shows income that is above the poverty guidelines for checking for low/no income but not enough income to be required to file a tax return with the IRS.
  - Multiple students have the same or very similar addresses and/or phone numbers.
  - If a male student, they can be independent by age.
  - If a female student, they can be independent by age and/or with dependents.
  - If the student is required to submit a copy of their identification for verification purposes and the copy is in color.
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If the student is exhibiting a good amount of these characteristics, they may warrant further investigation. To help determine where to start, review the received documentation and work to confirming the validity of the submitted information.

If you then suspect fraudulent activity, work with your administration and/or school legal counsel to report the information to the Department of Education's Office of Inspector General.

# CLLOUD COUNTY COMMUNITY COLLEGE

Financial Aid Office • 2221 Campus Drive • Concordia, KS 66901  
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## Title IV Fraud Concern Checklist

Last Name	First Name	CCCC ID#	SSN
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### Initial Checklist for Suspected Fraud

\*If 4 or more criteria are met, then select the student for V5 Verification and complete the Research section\*

- Independent by Age
- Low/No Income
- Multiple Prior Colleges per NSLDS and NSC
- Out of State Residence
- Will Not File Tax Return
- All Online Classes, if enrolled

### Research after documents start coming in

- Document all communication with student and others
- Verify validity of High School documentation submitted
- Verify validity of Prior College documentation submitted
- Complete Verification Review Process
  - Verify validity of Notary with that state
  - Color copy of Driver's License or other ID submitted
  - Evidence of tampering with documentation submitted

### Summary of Findings with Timeline

If the student has sufficiently appeared to have submitted fraudulent information/documentation, then a Word document describing the above findings and actions is needed. Ensure that a timeline is also made in a Word document that highlights the dates of communication, documentation received, and any other necessary dated information. Save these documents in the following path: Q > Financial Aid Information > Department of Education > Title IV Fraud. Create a folder titled in the above student's name and save each document there. Once these tasks are completed, print the checklist, finding's summary, and timeline and place them in the student's file.

After reviewing the collected information and the student's file, it has been determined that a report to the Office of Inspector General (OIG) should be made. By signing this form, the undersigned agree that action should be taken and a report made. Follow up action will be documented as needed.

_____ Financial Aid Office	_____ Date	_____ Vice-President of Student Affairs	_____ Date
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Date OIG Called	Date file sent to OIG	Date of follow-up(s) from OIG

# Memo

## Cloud County Community College

To:            OIG

From:          Name and Title  
                  Cloud County Community College

Date:          03-06-2019

Re:            Student Name / Suspected Fraud

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**04-09-2018** – 18-19 ISIR # 1 received by CCCC / New ISIR checklist printed / no NSLDS history / student not chosen for verification by DOE / name has been associated with [REDACTED], student previously reported to OIG with suspected fraudulent documents

**04-26-2018** – review of student file / chosen for V5 verification

**04-30-2018** – mail returned that was addressed to 915 Terminal Road, Montgomery, AL

**02-04-2019** – Student submitted Application for Admissions and enrolled in courses / requested copy of Admissions application along with copy of accepted High School Transcript

**02-05-2019** – checked NSLDS and NSC history / student attended Troy University and Mayville State University

**02-13-2019** – no contact with student until February of 2019 / student started calling and e-mailing regarding the status of his Financial Aid

**02-20-2019** - student called checking on Financial Aid status

**02-20-2019** – student called with questions regarding Verification forms

**02-25-2019** – student e-mailed asking about packaging and awarding aid

**02-26-2019** – student e-mailed asking about the T-Bird debit card

**02-28-2019** – student asking about process of direct deposit and if the file has been packaged and awarded

**03-01-2019** – Verification Documents received by mail for student / documents reviewed and suspected fraudulent documents

**03/01/2019** – met with VP of Student Affairs and Dr Douglas to inform them of potential fraudulent documents

**03-05-2019** – Reviewed Documents with following info:

*Low or No income form* – questionable document – reason for no income was very similar to Harbison's

*V5 Verification Worksheet* – [REDACTED] notary is not a registered notary with State of Alabama / same notary on [REDACTED] verification documents

*Alabama's drivers licensed-* is in color and the signature on DL is different than what is on the V5 worksheet

*Verification non filing* – font is not consistent throughout document / appears to have been tampered with

*High School transcript* – seal just says Alabama High school does not have Robert E Lee High school on seal / document is not consistent and appears to have been tampered with