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Policy for Identifying and Resolving Conflicting or Discrepant Information

Purpose

This policy establishes procedures for identifying and resolving discrepancies in student information from various sources, including the FAFSA, institutional records, and third-party documentation, to ensure the integrity of Title IV aid administration.

a. Identification of Discrepancies

Conflicting or inconsistent information may arise from the following sources:

- **FAFSA/ISIR data (e.g., income, dependency status, citizenship)**
- **Tax documents (IRS transcripts, W-2s)**
- **Verification worksheets**
- **Admissions and registrar records (enrollment, academic level, graduation dates)**
- **Student self-reporting**
- **Other external databases (NSLDS, Selective Service, SSA, DHS)**

The Financial Aid Office flags discrepancies at the time of:

- **Initial FAFSA processing**
- **Verification review**
- **Professional judgment adjustments**
- **Loan origination**
- **Disbursement authorization**

b. Resolution Procedures

When a discrepancy is identified:

- **The student's aid file is placed on hold until resolution.**

- The Financial Aid Office contacts the students to request clarification and documentation.
- Conflicting information is reviewed and resolved through:
 - Updated documentation (e.g., corrected tax info, proof of citizenship)
 - Corrections submitted to the CPS (Central Processing System), if necessary
 - Revised award amounts or aid status adjustments

No Title IV funds are disbursed until the discrepancy is fully resolved.

c. Documentation

- All conflicting information and its resolution are documented in the student's aid file.
- If corrections are submitted to CPS, a corrected ISIR is printed or stored electronically.
- Notes are entered in the student information system (SIS) to track the issue and actions taken.

a. Staff Responsibilities

- Financial Aid Officers identify discrepancies during file review and verification.
- Senior Financial Aid Staff are responsible for resolving complex cases or those requiring professional judgment.
- Compliance Officer (or designee) conducts periodic audits of resolved discrepancies.

b. Training and Review

- Financial Aid staff receive annual training on conflict resolution and documentation standards.
- The institution conducts periodic internal audits to ensure adherence to this policy.