

# Missouri Western State University

<b>Policy Name:</b> Student Identification, Fraud Detection, and Prevention	<b>Responsible Office:</b> Financial Aid
<b>Policy Category:</b> Admissions, Enrollment and Eligibility	<b>Approving Authority:</b> Vice President of Finance and Administration
<b>Date Effective:</b> May 20, 2026	<b>Date Last Reviewed/Revised:</b>

## I. Purpose

Missouri Western State University (University) is committed to maintaining the integrity of institutional, state, and federal financial aid programs and protecting student and University data from fraudulent activity. This policy establishes procedures for detecting, reviewing, and reporting potential student fraud related to any portion of the student’s educational record.

## II. Applicability

This policy applies to all persons enrolled or seeking enrollment at Missouri Western State University and to all University personnel.

## III. Definitions

**Identity Theft:** A fraud committed or attempted using the identifying information of another person without authority.

**Financial Aid Fraud:** Any situation where an individual misrepresents or falsifies information to qualify for federal, state, or institutional financial aid. This includes, but is not limited to, submission of false documentation, misrepresentation of dependency status, or identity theft.

Examples of financial aid fraud include:

- Enrolling in classes and accepting financial aid based on enrollment with no intent to complete said classes.
- Reporting untruthful information, or failing to report truthful income/asset information, on the FAFSA or other financial aid documents.
- Using or attempting to use another person’s identity or identifying information.
- Creating fake (a.k.a. “ghost”) accounts.
- Applying for admission using fake credentials which include social security numbers, personal and student identification numbers, financial aid information, date of birth, driver’s license number, address, and telephone number.
- Submitting false or misleading information on the FAFSA or any supporting financial aid documents. Including but not limited to:

- Misreporting income, household size, or dependency status; and
- Providing forged or altered documentation.

**“Red-Flag”:** A pattern, practice or specific activity that indicates the possible existence of Identity Theft.

**Return to Title IV (R2T4):** R2T4 refers to the calculation required when a recipient of Title IV aid withdraws from an institution during a payment period/period of enrollment in which the recipient began attendance. The calculation compares the amount of Title IV aid the recipient earned to the amount disbursed and determines whether funds must be returned, or if the student is eligible for a post-withdrawal disbursement.

#### **IV. Policy**

In order to protect the integrity of its federal Title IV and institutional financial aid programs, Missouri Western State University complies with all existing statutory and regulatory requirements to disburse aid only to eligible students, to identify and resolve discrepancies in student information, to ensure all requirements regarding the regulatory definition of “regular students” status are met, and to report any suspected fraud to the Office of the Inspector General of the U.S. Department of Education. To that end, Missouri Western State University actively reviews and monitors University systems for patterns and behaviors consistent with fraudulent activity.

#### **V. Procedures and Implementation**

##### **A. Detection of Fraudulent Activity**

Employees in Admissions, Records and Registration, Financial Services and Financial Aid offices will monitor student records for indicators of potential fraud, including but not limited to the following “red flag” indicators:

1. Inconsistent, discrepant, or suspicious documentation.
2. Frequent changes in address or banking information.
3. Multiple aid applicants under the same address or phone number.
4. Concerning multi-factor authentication anomalies
5. Credible notice that an individual has been a victim of, or has perpetrated, identity theft.
6. Notification and warnings from credit reporting agencies, such as fraud detection services.
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8. Credible notice that a particular account is fraudulent.

## **B. Conflicting Information and Title IV Eligibility**

Missouri Western State University will flag any student account for one or more of the above criteria to contain conflicting information as defined under federal Title IV regulations. Until all discrepancies are resolved through Missouri Western State University's fraud verification process:

- The student's eligibility for Title IV aid is not established;
- No federal financial aid may or will be disbursed; and
- For Return to Title IV (R2T4) purposes, students without confirmed identity verification are considered ineligible for Title IV funds.

## **C. Imposition and Removal of Holds on Accounts**

### **1. Immediate Holds**

When an account is flagged due to suspicious activity, the University places an identity verification "hold" on the student's account. An identity verification hold prevents:

- Financial aid disbursement,
- Course registration or schedule changes, and
- Admission/acceptance into the University

### **2. Identity Verification**

To lift the identity verification hold, students may be required to complete an identity verification process, which will require:

- An in-person or live camera on Zoom or Google meeting with a Financial Aid representative, or other approved identity verification method.
- Providing and presenting additional information including but not limited to:
  - Bank Statements
  - Tax Returns
  - Official transcripts from other institutions of higher education that the student has previously attended.
  - Official High School Transcript or GED from the issuing entity.
  - Birth Certificate.
  - Social Security Card.

- Proof of residency at the address listed on the student's college records.
- Valid Passport.
- Unexpired State Issued Photo ID.
- Verification of key data elements on the student's FAFSA and Missouri Western State University record (e.g., permanent address, date of birth).

Additional documentation or steps may be required to resolve conflicting information.

### 3. Review and Documentation

A review committee composed of representatives from Financial Aid, Technology Services, Admissions, and Business Office (Fraud Monitoring Committee) will evaluate the documentation, meeting notes, and student responses to determine whether the student's record may be cleared or remains ineligible for enrollment and financial aid.

### 4. Student Communication

The Fraud Monitoring Committee designee will notify affected students in writing when their account is flagged and provide detailed instructions for completing the identity verification process. Communication with students shall emphasize Missouri Western State University's commitment to protecting student data and clarify that a "flag" does not necessarily indicate confirmed fraud.

## **D. Reporting Suspected Fraud or Identity Theft**

Internal Reporting: All University personnel are required to report any suspected fraud or identity theft by email to [reportfraud@missouriwestern.edu](mailto:reportfraud@missouriwestern.edu). All pertinent information and documentation that was used to determine suspected fraud must be included and attached to the email.

External Reporting: Confirmed: Confirmed cases of fraud or identity theft will be reported to relevant authorities, including the Office of Inspector General (OIG), local law enforcement, and applicable state agencies and the university's auditors.

Student Notification: If a student's personal information is compromised, the university will notify the student promptly and provide guidance on steps they can take to protect themselves (i.e., filing a police report and contacting credit bureaus and their banking institutions).

## **E. Enforcement**

Violations of this policy may result in severe consequences, including but not limited to:

- Referral to law enforcement as appropriate.
- Submission of report to the U.S. Department of Education Office of Inspector General.
- Immediate suspension of financial aid awards and disbursements.

- Recovery of any funds obtained through fraudulent means, including collection efforts or garnishment of future earnings.
- A hold being placed on the individual's account.
- Disciplinary action as outlined in the Student Code of Conduct
- Civil or criminal sanctions.