Combating Fraud While Protecting Aid for True Students

May 21, 2014

- The webcast will begin at the top of the hour.
- There is no audio being broadcast at this time.
- If you need assistance, contact Blackboard Collaborate: 866-388-8674.
- An archive of this webcast will be available on the WCET website next week.

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Combating Fraud While Protecting Aid for True Students

May 21

Combating Fraud While Protecting Aid for True Students

- Welcome.

- Thank you Blackboard Collaborate!

- If you have technical issues:

    - Call 866-388-8674

- Use the chat box for questions.

- Archive, PowerPoint, and Resources available next week.

Megan Raymond, WCET

Blackboard collaborate™

Questions from the Audience

- If you have a question during the presentation, please add your questions to the chat box. We will monitor the chat box and have time for Q&A at the end of each section.

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Moderator

Luke Dowden

Director,

Office of Distance Learning

University of Louisiana at Lafayette

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Presenters

Joseph Agins

Director, Ethics and Compliance Investigations,
Apollo Education Group, Inc.

Kishia Brock

Vice President of Student Affairs and Advancement,
Rio Salado College

Ruby Miller

Associate Dean of Enrollment Services,
Rio Salado College

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Preventing Federal Student Aid Fraud Rings

Joseph Agins

Director, Ethics and Compliance

Investigations,

Apollo Education Group, Inc.

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Preventing Federal Student Aid Fraud
Organized Schemes

Joe Agins

Director Ethics and Compliance Investigations

Apollo Education Group/University of Phoenix

SFA Fraud in the News

[SFA Fraud in the News (Video)](#)

The Post and Courier

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7 fraud suspects are from Colleton

Edward Fennell | Posted: Tuesday, February 21, 2012 12:01 a.m.
UPDATED: Sunday, March 18, 2012 8:48 p.m.

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Seven of th
fraud are

Those indi
people nev
Charleston
S.C. Charle
financial a

As Online Courses Grow, So Does Financial Aid Fraud

By TAMAR LEWIN
Published: October 13, 2011

While serving nine months in a South Carolina prison on forgery charges, Michelle N. Owens capitalized on the explosion in online higher education to tap into a new — and highly lucrative — way to profit from fake documents.

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Using information she gathered as she handled paperwork in the prison's education department, Ms. Owens filed applications for admission and financial aid to Webster University's distance-learning programs on behalf of 23 unknowing inmates. The applicants were admitted and granted the $467,500 in requested aid, including $124,821 for books, transportation and living expenses — though of course their room and board was already provided by the state. The aid was sent in the form of debit cards to the residential South Carolina address
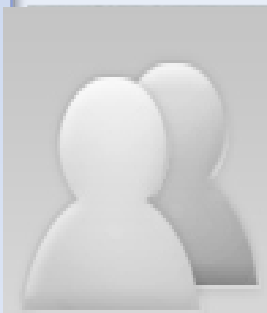
THE SESSIONS
COMING SOON

Valley Residents Arrested in Student Aid Fraud Case

12

012 at 2:30 PM PDT

United States Attorney Benjamin B. Wagner announced the
old Piersha Woolridge, 41-year-old Yvette August both of
old Kim Gray of Los Banos; and 41-year-old Keith Woolridge of
grand jury returned an indictment against them on February 2,
em with conspiring to commit student aid fraud and identity
he indictment charged Piersha Woolridge with 13 counts of
dictment was sealed until their arrest Tuesday.

ndictment, the defendants conspired to defraud the U.S.
lucation of student aid grants and loans by submitting false financial aid applications to Axia
versity of Phoenix and Capella University on behalf of students who did not intend to attend either
ment alleges that in some cases the defendants used stolen or wrongfully obtained personal
ation for persons who did not know their identities would be used to apply for college financial aid.
eges that as a result of the conspiracy, over $200,000 in grants and loans were disbursed,
resulting in approximately $110,000 being paid to the defendants.

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SFA Fraud in the News

11 metro Detroiters busted in student-loan crime ring

3:35 PM, March 28, 2013 | 5 Comments

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A A A

By Tresa Baldas
Detroit Free Press Staff Writer

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The federal government has busted a massive student-loan crime ring, charging 11 people across Metro Detroit with orchestrating a scheme that raided more than $1 million from the government by applying for bogus aid, the U.S. Attorneys office announced today.

One ringleader, the government said, recruited more than 40 people to apply as students for enrollment and aid, even though most had neither a high school diploma nor a GED, and were therefore ineligible to receive student aid. As a result, participants in that scheme alone received more than $665,000 in federal student aid. Meanwhile, two of the same ringleader's brothers orchestrated a similar scheme.

Related: Pell Grant scammers ripping off Michigan colleges for millions

The case involves four separate crime rings that, authorities say, targeted mainly distance education programs, such as Internet college courses, where students don't have to be physically present for courses. The groups operated independently of one another between 2006 and 2010.

Qwik Pi
PHOTO
Michigan's Photo Bo
"It's Just Good
(877) PICZ-

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SFA Fraud in the News

THE TICKER

Breaking news from all corners of academe.

Trending   **Guns**   **For-Profit Colleges**   **Tuition**   **Tweed**   **Students**

April 12, 2013 by Nick DeSantis   💬 Comment (0)

22 Face Charges of Student-Aid Fraud in California

Almost two dozen people are facing charges in connection with an alleged financial-aid fraud ring at California's Contra Costa College. The scheme is known as a **"Pell runner"** scam, and has affected many other colleges. Criminal charges were filed last year, though the case continues, with the authorities still searching for eight suspects. Four others agreed to plea deals, and the remaining 10 have court dates this month.

Source:
CONTRACOSTATIMES

❝ *The elaborate fraud ring at the San Pablo community college campus, according to prosecutors, was hatched by a Richmond couple in 2011. Authorities say ringleader Yvette Hummel, 45, and her boyfriend David Murphy, 54, ran the scheme like a business, using fliers and contracts to recruit people for their scam. Hummel would obtain personal information from the recruits and use it to enroll them in college classes and apply for financial aid, court records show. In exchange, Hummel asked for a 25 percent slice, about $675 of the $2,775 a student on financial aid receives per semester, and offered a $50 referral fee, records show. None of the alleged scam artists is younger than 30, and many are in their 50s, 60s and 70s.*

Read more at: www.contracostatimes.com

SFA Fraud in the News

East St. Louis couple faked their way to 16 student loans worth $46,000

12 hours ago • By Robert Patrick rpatrick@post-dispatch.com 314-621-5154

5
Loading...

Enlarge Photo

McClellan: Homeless man on the hook for college loan he never asked for

Letters keep warning Jerry Belford that he owes on a loan; problem is, he says he never applied for the loan. Read more

Liberal arts colleges forced to evolve with market

ADRIAN, Mich. • They're the places you think of when you think of "college" — leafy campuses, small classes, small towns. Liberal arts college... Read more

EAST ST. LOUIS • An East St. Louis couple pleaded guilty to a federal conspiracy charge Monday and admitted fraudulently enrolling 16 students in an online university to steal student loan funds.

Antwayne B. Crumble and Danyelle T. McNeil used the personal information of 28 friends and relatives to apply to online undergraduate programs at the University of Phoenix between Sept. 1, 2008 and Sept. 28, 2009, court documents show. Once accepted, the pair then enrolled the fake students in classes and applied for student loans.

Crumble and McNeil succeeded in enrolling 16. The rest were turned down for loans.

McNeil completed the students' coursework for the first ten days, until loan funds were released, documents claim. All coursework stopped after the loan money came in. The pair received $46,778 that they received in student loan refunds, splitting it with the "students," and spent their share on personal expenses, documents show.

Nine of the students had never completed high school or obtained their GED, making them ineligible for financial aid.

Crumble and McNeil waived indictment and pleaded guilty Monday to conspiracy to commit student loan fraud, mail fraud and wire fraud.

Watch News Clip

Regulatory References In Summary

- US Department of Education > Standards of Administrative Capability > Resolving Conflicting Data

- C.F.R § 668.16(f) – An institution must develop and apply an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs...

- C.F.R § 668.16(g) – An institution has an obligation 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...

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Regulatory References In Summary

- [Fighting Fraud With the Red Flags Rule](#)

  - Issued by the Federal Trade Commission (FTC)

  - Requires many businesses and organizations to implement a written Identity Theft Prevention Program designed to detect the warning signs — or "red flags" — of identity theft in their day-to-day operations. By identifying red flags in advance, businesses will be better equipped to spot suspicious patterns that may arise -- and take steps to prevent a red flag from escalating into a costly episode of identity theft.

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Audit Report from Office of Inspector General, U.S. Dept of Education

Additional Safeguards are Needed to Help Mitigate the Risks that Are Unique to the Distance Education Environment.   U.S. Dept of Ed.   OIG.   Feb. 2014

http://www2.ed.gov/about/offices/list/oig/auditreports/fy2014/a07l0001.pdf

Audited 8 institutions, all sectors, enrollments from 7/2010 to 6/2011

Key risk areas identified:

- Verification of student identity
- Determination of student's academic attendance
- Calculation of cost of attendance for distance ed students

Some recommendations included:

- Smaller, more frequent disbursements
- Develop a general regulatory definition of "attendance" and distinguish between distance education and traditional campus-based.
- Cost of attendance should reflect actual educational needs

Fraud Ring Characteristics

- Schemes typically target online and the less-expensive and/or two-year "entry level" programs

- Fraud "Ring Leader" recruits participants enticing them with an opportunity for free money

- Scheme participants typically target vulnerable populations (e.g. younger persons and/or in economically depressed areas)

- Most participants never graduated high school or completed a GED program but falsify admissions

- Ring Leader often sets student accounts up with one or a few common addresses/phone numbers/emails

- Participants provide personal info to Ring Leader, who will register for school, apply for federal student aid, and "do all of the homework" to maintain attendance until the funds are disbursed

- Once funds are disbursed, Ring Leader and participant split the funds, stop attending, and the student is not heard from again

- Scheme ring leaders often attend school themselves as well as helping recruits to attend fraudulently

- Ring leaders will also set up student accounts with stolen identities to avoid having to split the proceeds

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Questions from the Audience

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Kishia Brock

Vice President of Student Affairs and Advancement,

Rio Salado College

Ruby Miller

Associate Dean of Enrollment Services,

Rio Salado College

Institutional Profile

- Rio Salado College
  - 1 of 10 Maricopa Community Colleges
  - Open Access
  - Tuition
    - $215 out-of-state online
    - $81 in-state
  - Rapid enrollment growth
    - 65,000 credit/non-credit students annually
    - 44,393 online students annually
  - PeopleSoft School

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Our Experience

Rio Salado Timeline

2007-2011 Aggressive reporting

July 2011 Strategic Decisions based on data

12/2011 – 8/2012 Soft Launch

8/2012 Identity Authentication

July 2013 Authentication process – all new students

For Fall 2014 - Working with Maricopa to launch approach Districtwide

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Consequences of Fraud

- Financial
  - Debt student and institutional
- Rising cohort default rates
- Inaccurate headcount and FTSE projections

- Reputation/public image
- Staff time and resources
- Staff Morale
- Reporting
  - OIG reporting
  - Testifying
  - Identity theft claims

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Formulating an institutional Approach

- Define and Communicate Staff Expectations
  - What activity constitutes suspicion?
  - How do we apply a fair and equitable standard?
  - Risk = Legal, e.g. Office of Civil Rights (OCR)Complaints

- Collaborate with Institutions
  - Lansing Community College
  - Apollo Group/University of Phoenix

- Implement Strategically
  - Student Success Driven
  - Student Conduct Driven
  - Admissions Driven
  - NOT Financial Aid Driven

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Balancing Act

Access

Fraud Prevention

Admissions

Open access

Enrollment barriers

Low-cost

Application Fees

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Resources

Pell Runners

Straw Students

Legitimate inquiries
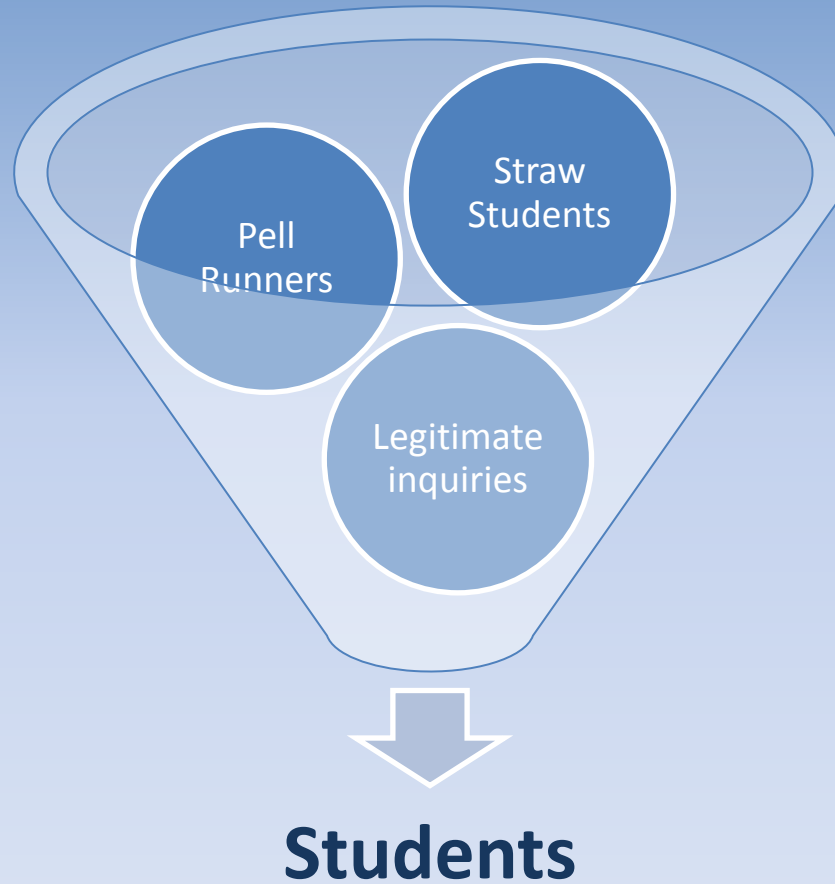
Students

Formulating an Institutional Approach

- College-wide effort instead of a "financial aid problem"
    - Institutional Research
    - Academic Integrity
    - Admissions
    - Student Code of Conduct
    - Legal

- Embedded into Student Success initiatives
    - Realign student flow
    - All incoming students seeking a degree or certificate
        - Authenticate identity
        - Authenticate prior education
    - Referrals
    - Report analytics

- Establish new organizational responsibilities
    - Judicial Affairs Office
    - Academic Integrity Team

Redesign the Student Flow

Clear Intent

Program Seeker

Supplemental

Authentication

Identity

Prior Education

Student Success

Placement Testing

Academic Advisement

New Student Orientation

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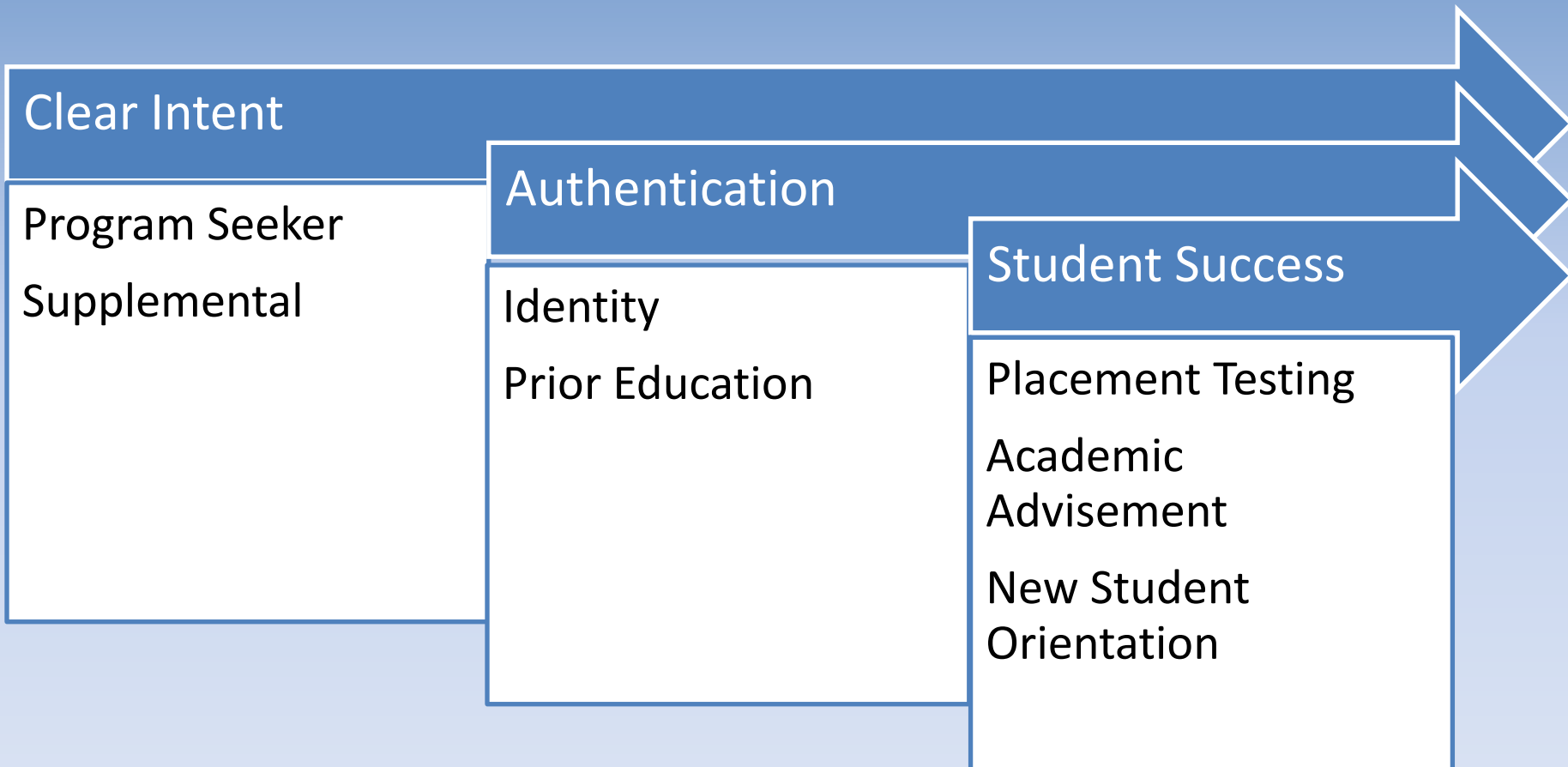
Open Access

- Collaborated with Legal
    - Students quick admit and enroll
    - They can self-pay and/or go on a payment plan and skip prior learning authentication

- Financial Aid process does not begin until prior education and ID are authenticated

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Authentication – College process

- Identity – new to college program seekers are required to submit government issued IDs
  - Process – students quick admit, TO DO items go on their student record. They must submit:
    - Scanned color copy
    - Document is reviewed and verified
    - TO DO items are removed (TO DO items are removed after both required documents are received)
    - Unacceptable documents are submitted to Judicial Affairs Associate Dean for sanction (Student Conduct Code)
    - Administrative Hold may be placed on student record

  - Communication
    - Auto email notifying student documents have been received
    - Message in message Center in SIS with detailed instructions
    - Notes are entered into SIS in the comments section to communicate with other staff around the college

  - Timeline
    - 3-5 business days to process and remove after both documents have been received

Authentication – College process

- Prior Education
  - Process – students quick admit, TO DO items go on their student record. They must submit:
    - Office Transcripts
    - Document is reviewed and verified
    - TO DO items are removed (TO DO items are removed after both required documents are received)
    - Unacceptable documents are submitted to Judicial Affairs Associate Dean for sanction (Student Conduct Code)
    - Administrative Hold may be placed on student record

  - Communication
    - Auto email notifying student documents have been received
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Resource Implications

- Staffing Levels – we started with six staff members and the Associate Dean. We now have four staff members. Student Conduct issues are referred to the Associate Dean
- Skills/qualifications – knowledge of A&R, financial aid and student financials processes, access to SIS, attention to detail, good communication skills.
- Physical Resources
  - SIS
  - ID Checking Guide 2014/2015
  - Repository for documents
  - Color Printer
  - Service email accounts
  - HEP guide
  - List of agencies students can contact for GED, etc.
  - Home schooled process for obtaining diplomas

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Lessons learned

- Our process changes over time
- Ring leaders figure out ways to attempt to get students registered
- Communication between institutions is very important
- Students stopped at our institution attempt to go to another MCCCD college
- Institutions need to develop a communication plan to assist other colleges when fraud is suspected
- Students come to us to ask for withdrawal letters so they can attend other institutions.
- We have to out think like the fraudsters!

Rio Salado College - Next Steps

- Continued collaborate with Maricopa on a district wide solution

- Comprehensively study and evaluate effectiveness
  - Effects on enrollment
  - Catch rate
  - Overall college debt

- Incorporate additional reporting currently used by University of Phoenix

- Improve process for reporting to the OIG

- Solutions to address the cohort default rate

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Questions from the Audience
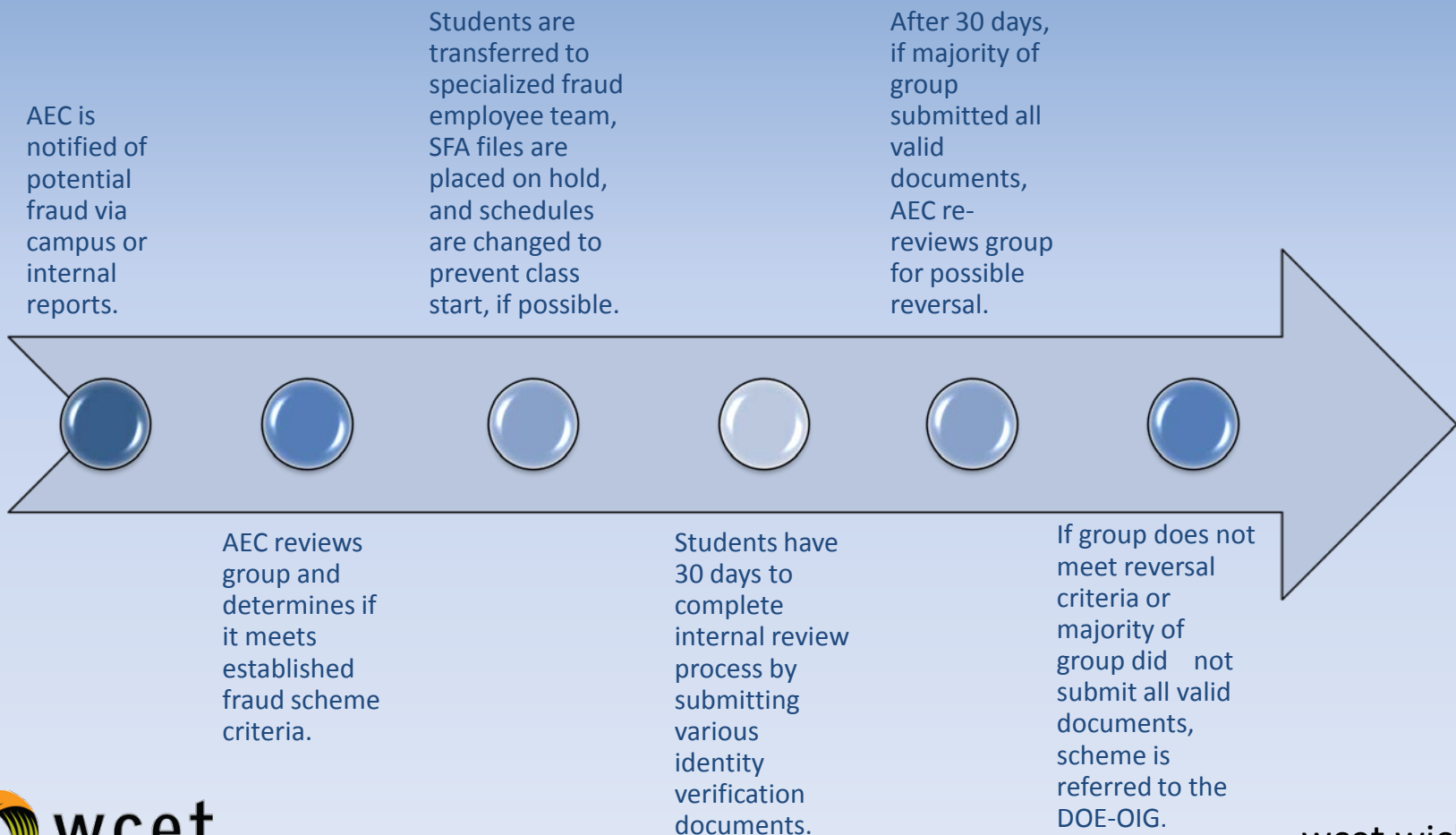
Preventing Federal Student Aid Fraud Rings

Joseph Agins

Director, Ethics and Compliance

Investigations,

Apollo Education Group, Inc.

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SFA Fraud Student Management Process - UOPX

AEC is notified of potential fraud via campus or internal reports.

Students are transferred to specialized fraud employee team, SFA files are placed on hold, and schedules are changed to prevent class start, if possible.

After 30 days, if majority of group submitted all valid documents, AEC re-reviews group for possible reversal.

AEC reviews group and determines if it meets established fraud scheme criteria.

Students have 30 days to complete internal review process by submitting various identity verification documents.

If group does not meet reversal criteria or majority of group did not submit all valid documents, scheme is referred to the DOE-OIG.

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Prevention Techniques: General Actions Taken

- AEC team consisting of four FTEs dedicated to the anti-fraud effort

- Ancillary benefit of University Orientation course: <u>Deterrent to fraud</u>

- University Orientation is a 3 week, no cost, non-credit course required for all new students with less than 24 college credits. Opportunity to "test drive" the University to determine if they are ready for the academic rigor.

- SFA suspected fraud scheme intake form created for employees to submit issues or suspicious activity

- Employee education and awareness campaign launched including numerous trainings, teleconferences, job aids, compliance alerts, etc. regarding how to detect and report suspected SFA fraud students

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Prevention Techniques: IT Initiatives

- Datamart developed to house suspected fraud student information
- Fraud-detection reports developed for regular delivery and review:
  - **Duplicate Demographic Report**: identifies 4+ matches on address, phone, or email (all 4 must have completed an app)
  - **Duplicate Direct Deposit Report:** identifies 3+ students with same bank account info on FAW (for receipt of SFA refunds)
  - **Duplicate IP Address Report:** identifies 4+ students using the same IP address to e-sign the admissions application
  - **Reverse Look-up (RL) Reports:** three weekly RL reports identify new matches to current fraudsters on the matching elements mentioned above
  - **SVP Match Report:** identifies groups of students sharing the same SVP (Student Verification Process) PIN numbers and security question answers
  - **Death Master File:** compares student SSNs with SSNs on the Social Security Administration (SSA)'s Death Master list- if there is a match, and that match has positive attendance that occurred >10 days after the date of death (per the SSA), student is identified on the DMF report
- **Other potential "linking " elements:** students being on each other's FERPA releases or verification worksheets, submitting the same schoolwork, etc.

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Real Fraudster Data Examples

Dupe IP report

Date	Time	LoginID	Source IP	Source City	Source Coordinates
6/20/2012	8:02:28	cornelivs7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	8:02:28	cornelivs7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	8:03:14	james7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	8:03:25	james7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	19:23:29	james7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	19:23:29	james7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	19:26:55	larreonde7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	19:27:27	larreonde7525	68.202.74.***	Ocala	29.1178, -82.31
6/20/2012	19:27:28	larreonde7525	68.202.74.***	Ocala	29.1178, -82.31
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6/20/2012	19:29:55	james7525	68.202.74.***	Ocala	29.1178, -82.31
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6/20/2012	19:31:07	dan7525	68.202.74.196	Ocala	29.1178, -82.31
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6/20/2012	19:32:26	thomas75250	68.202.74.196	Ocala	29.1178, -82.31
6/20/2012	19:32:27	thomas75250	68.202.74.196	Ocala	29.1178, -82.31

Dupe Demo report

B STUDENT FIRST NAME	D LEAD_CREATE_DATE	E LEAD_ SOURCE	F PROGRAM	G PHONE MATCH COUNT	H ADDRESS MATCH COUNT	I HOME_PHONE	J HOME_ADDRESS LINE 1
Shawn	06/01/2009 01:33:23PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Joseph	06/01/2009 01:36:28PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Pamela	06/01/2009 01:38:39PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Stanley	06/01/2009 01:40:41PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Twana	06/01/2009 01:42:45PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Alexandria	06/01/2009 01:56:58PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Arthur	06/01/2009 01:59:00PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Brian	06/01/2009 02:01:28PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Calvin	06/01/2009 02:07:56PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Jeffery	06/01/2009 02:09:31PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Rowjester	06/01/2009 02:10:59PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Mcdonald	06/01/2009 02:13:41PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Wayne	06/01/2009 02:32:11PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Larry	06/01/2009 02:34:22PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Stanley	06/01/2009 02:41:54PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Gary	06/01/2009 02:43:29PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
John	06/01/2009 02:45:19PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Kevin	06/01/2009 02:48:47PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Cory	06/01/2009 02:50:10PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11
Louis	06/01/2009 02:51:55PM	REFR	AAFB	98	89	(***) 466-4141	79 W 1ST AVE, STE 11

B LoginID	D Email Address
cashflowstreetsmoney	cashflowstreets@
bigmoneymike55	HMichaelA@aol.com
Getmoney2363	redmond.cash@
Moneygodgolden	moneygodgolden@
BALLER2009	valeried96@
greenmoney47	prettyinpink12us@
amyj197338	hustleramy1973@
Brandon900	bighustlebrady@
jeremycashregister	jeremycashregister@

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Fraud Student Management Process

- Dedicated team of counselors created to manage suspected fraud student population

- Institution self-selects for additional verification: INTREV (internal review) process implemented requiring suspected fraud students to complete an extensive identity verification process to receive SFA

  - **stops bad actors, permits good actors to proceed**

- If not initially flagged, reviewed students might still be put on "Watch" (regularly reviewed for new matches/info that might prompt later flag)

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Referrals to the OIG

- Referral info is burned to a DVD and shipped to the OIG (Personal Identifier Information protected). Referral package for each scheme includes but is not limited to:

  - Spreadsheet of student info

  - Student documents (e.g. admissions app, financial agreement, verification worksheet, etc.)

  - Student ISIRs, cancelled check copies, SFA refund transaction log

  - Internal Review (INTREV) documents (examples on next slide)

  - Any additional info (e.g. Student Code of Conduct charge letters, recorded phone calls, etc.)

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Fraudulent Document Examples

More Fraudulent Document Examples

Catch Rate – Measuring Success

- **"Catch Rate"** =   # of flagged students "caught"
                        Total # of Flagged students

  - "# caught" refers to fraudsters flagged **PRIOR** to any SFA being disbursed
  - Remaining fraudsters were flagged **AFTER** SFA already disbursed and so considered not "caught"

- Developed to measure Fraud Squad success
- Consistently high – 75-80% monthly average

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Partnership with Law Enforcement

- Dedicate adequate resources to the effort

- Successful program demands healthy relationship with the OIG. Regular communication is key.

  - discuss national fraud trends and best practices

  - understand the types of information the OIG and the U.S. Attorney's office will need to identify and prosecute individuals involved

- *"The squeaky wheel gets the grease",* as do those cases with the best info

  - More detailed and higher quality referrals result in more prosecutions

- Many fraudsters also involved in numerous other crimes – mail fraud, passport fraud, mortgage fraud, social security fraud, ID theft, etc.

- Other investigative resources besides OIG – Postal Inspectors.

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School Coalition

Contact Information

Joseph Agins
Director, Ethics and Compliance Investigation
Apollo Education Group/University of Phoenix
602-557-3535
Joseph.agins@apollo.edu

Kishia Brock
Vice President of Student Affairs
Rio Salado College
480-517-8567
kishia.brock@riosalado.edu

Ruby Miller
Associate Dean of Students
Rio Salado College
480-517-8152
Ruby.miller@riosalado.edu

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Questions from the Audience

- Please add your questions to the chat box. If we don't get to all of the questions we will have the presenters provide written responses.

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- Access to the resources discussed during this webcast, including the archive, will be available next week.

  - http://wcet.wiche.edu/connect/webcasts

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