



UAEACP 501.1.5 FRAUDULENT STUDENT IDENTIFICATION AND PREVENTION

The University of Arkansas East Arkansas Community College (UA-EACC) is committed to maintaining the integrity of its admissions, enrollment, and financial aid processes by identifying, preventing, and responding to fraudulent student activity, including identity misuse, misrepresentation, and financial aid abuse. This policy establishes standards for detecting potential fraud, verifying student identity, and ensuring compliance with institutional, state, and federal regulations.

Purpose

1. UAEACC is committed to maintaining the integrity of its admissions, enrollment, student-account, and financial aid processes by identifying, preventing, and responding to fraudulent student activity, including identity misuse, misrepresentation, account compromise, and financial aid abuse.
2. This policy establishes risk indicators, identity-verification standards, institutional controls, response requirements, documentation expectations, and reporting responsibilities consistent with applicable institutional, state, University of Arkansas System, and federal requirements.

II. Scope

1. This policy applies to all individuals engaging with the College, including:
 - a. Applicants for admission;
 - b. Enrolled students;
 - c. Readmission applicants;
 - d. Students receiving or applying for financial aid; and
 - e. Individuals seeking to reactivate or access an existing student record or account.

III. Definitions

1. Fraudulent student activity means an attempt to misrepresent identity, academic history, financial aid eligibility, enrollment intent, account ownership, or academic engagement for personal, financial, or academic gain.
2. Fraudulent student activity includes, but is not limited to:
 - a. Identity theft, impersonation, or use of a compromised identity or student account;
 - b. Submission of falsified, altered, duplicated, or otherwise unauthentic documentation;
 - c. Misrepresentation of eligibility, enrollment intent, attendance, or academic engagement; and
 - d. Participation in enrollment or financial aid schemes, including "ghost student" activity.
3. A fraud risk indicator or red flag is a fact, pattern, discrepancy, alert, or combination of circumstances that warrants additional review. A red flag does not, by itself, constitute a final finding of fraud.

IV. Fraud Risk Indicators

1. The College shall use documented red flag indicators throughout the student lifecycle. Reviews shall consider the totality of available information, with enhanced verification when multiple or elevated-risk indicators are present.

Application and Admissions Indicators



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2. Examples include:

- a. Duplicate contact, identity, device, or address information across multiple student records;
- b. Email, name, date-of-birth, address, or identity inconsistencies across records;
- c. Applications submitted in unusual patterns, in volume, or with unusual urgency near processing deadlines;
- d. Invalid or unverifiable telephone numbers, addresses, email domains, or supporting information;
- e. Refusal or inability to verify identity or provide requested documentation; and
- f. Application information inconsistent with the individual's stated educational history or enrollment objective.

Academic Records and Transcript Indicators

3. Examples include:

- a. Transcripts not received from an official, verified, or approved source;
- b. Duplicate or highly similar transcripts across multiple students
- c. Academic records that do not align with institutional, regional, or issuing-school practices;
- d. Inconsistencies in names, dates, graduation timelines, course types, signatures, postmarks, school information, formatting, or other record elements;
- e. Evidence of altered, unofficial, computer-generated, or otherwise unauthenticated records; and
- f. Records that cannot be authenticated through the issuing institution or an approved third-party source.

Financial Aid, Refund, and Identity Indicators

4. Examples include:

- a. Discrepancies among admissions data, transcripts, financial aid records, and FAFSA information;
- b. Conflicting name, date of birth, Social Security Number, citizenship, residency, or other identity data;
- c. Requests focused primarily on financial aid awards, refunds, or expedited disbursement;
- d. External, unverifiable, or recently changed banking or refund methods;
- e. Unusual enrollment history, transfer activity, or course-registration patterns inconsistent with the stated academic objective;
- f. Changes to refund preferences, account credentials, or banking information immediately before disbursement;
- g. Blocked, high-risk, or anomalous activity reported by the College's refund, banking, identity, or technology service providers;
- h. Discrepancies identified in subsequent Institutional Student Information Records or after aid has been awarded or disbursed; and
- i. Requests to release refunds before attendance, participation, or substantive academic engagement has been confirmed.

Enrollment and Participation Indicators

5. Examples include:



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- a. Failure or refusal to verify identity during enrollment or continued attendance;
- b. Inconsistent, geographically irregular, or otherwise anomalous login, device, or multifactor-authentication activity;
- c. Failure to demonstrate authentic attendance, participation, or substantive academic engagement;
- d. Inability to satisfy identity validation in online learning or proctoring environments; and
- e. Coordinated enrollment, course-selection, withdrawal, or participation patterns across multiple records.

Readmission and Existing-Account Indicators

6. Examples include:

- a. A request to reactivate a student record accompanied by significant changes to contact, identity, banking, authentication, or refund information;
- b. Login or multifactor-authentication activity inconsistent with the established account history;
- c. Unexplained changes to email addresses, telephone numbers, physical addresses, credentials, or refund preferences; and
- d. Inability to verify information reasonably associated with the prior student record.

V. Identity Verification Requirements

1. The College may require identity verification at any point in the student lifecycle. Verification measures may include:
 - a. A valid government-issued photo identification;
 - b. Verification of legal name, date of birth, address, residency, and other identifying information;
 - c. Official transcripts and supporting documentation received from or authenticated through the issuing institution or an approved third-party source;
 - d. Confirmation of financial aid and FAFSA information;
 - e. In-person or live virtual identity confirmation using a valid government-issued photo identification when elevated fraud-risk indicators are present; and
 - f. Other lawful, risk-based verification measures reasonably necessary to resolve identified discrepancies.
2. The College shall use layered verification for higher-risk cases and shall limit the collection, access, use, transmission, and retention of personally identifiable information to authorized purposes and personnel.
3. A determination shall not be based solely on geography, protected status, or another characteristic unrelated to a documented and legitimate fraud risk.

VI. Holds, Cross-Referencing, and Data Verification

1. When fraud-risk indicators are identified, the College shall apply an appropriate hold or pending status at the applicable stage, including application, admission, financial aid awarding, refund disbursement, enrollment, attendance, or academic-engagement confirmation. Processing shall remain paused until the concern is reviewed and resolved.
2. Admissions, Financial Aid, the Registrar, Business Services, Information Technology, and other appropriate offices shall, as applicable:



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- a. Compare student data across application, transcript, student-account, identity, enrollment, engagement, and financial aid records;
 - b. Investigate discrepancies in identity, academic history, eligibility, account activity, banking or refund information, and engagement;
 - c. Coordinate when indicators affect more than one area of the student lifecycle;
 - d. Withhold admission, transcript evaluation, registration, aid awarding, or disbursement until identified concerns are resolved; and
 - e. Review relevant alerts, exception reports, blocked-access reports, unusual activity, and other available risk information.
3. The College shall maintain a documented, risk-based review process that may use queries, automated flags, comment codes, risk levels, application locking, enhanced verification, and cross-functional review.

VII. Institutional Response and Reporting

1. When fraudulent activity is suspected:
 - a. Applicable admissions, enrollment, student-account, refund, or financial aid processing shall be suspended or restricted;
 - b. An appropriate hold or pending status shall be placed on the record;
 - c. Additional identity, document, eligibility, attendance, or engagement verification shall be required;
 - d. The matter shall be escalated to appropriate institutional leadership; and
 - e. Suspected fraud shall be reported through appropriate institutional channels to the University of Arkansas System Internal Audit Department in accordance with University of Arkansas Board of Trustees Policy 350.1.
2. No final determination regarding admission, enrollment, student-account activity, refund eligibility, or financial aid shall be made until the applicable review is completed.
3. If suspected or confirmed fraudulent activity results in a loss greater than \$1,000, the College shall report the loss to Arkansas Legislative Audit and the University of Arkansas System Internal Audit Department in accordance with applicable reporting requirements.
4. Credible information involving suspected fraud affecting federal student aid shall be referred to the appropriate federal authority, including the U.S. Department of Education Office of Inspector General, when required by applicable law, regulation, or federal guidance.
5. Nothing in this policy prevents the College from notifying law enforcement, legal counsel, service providers, or other appropriate authorities when authorized or required.

VIII. Enrollment and Financial Aid Restrictions

1. Individuals or students under fraud review:
 - a. May be restricted from admission, registration, account access, or changes to identifying or refund information;
 - b. May not receive financial aid awards, disbursements, or refunds while applicable verification is pending;
 - c. May be required to complete additional identity, eligibility, attendance, or engagement verification; and



- d. May be denied admission, administratively dropped or withdrawn, have aid adjusted or canceled, or be subject to other action authorized by law and College policy when identity, eligibility, documentation, attendance, or engagement cannot be verified.
- 2. Attendance, participation, LMS activity, substantive academic engagement, instructor confirmation, or other appropriate evidence may be reviewed before continued enrollment or release of funds.
- 3. Any adverse action shall be documented and communicated in accordance with applicable College policy, law, regulation, and due-process requirements.

IX. Documentation, Confidentiality, Training, and Review

- 1. The College shall:
 - a. Maintain records of risk indicators, verification activities, holds, monitoring, findings, determinations, referrals, reports, losses, and case resolution;
 - b. Handle personally identifiable information in accordance with FERPA, applicable privacy and information-security requirements, and College records-retention practices;
 - c. Limit access to fraud-review information to personnel with a legitimate institutional need;
 - d. Require appropriate staff training on fraud detection, identity verification, documentation, confidentiality, escalation, and reporting; an
 - e. Preserve records necessary to support audits, reviews, referrals, recovery efforts, or other official action.
- 2. Actions under this policy shall be consistent, documented, risk-based, and auditable.
- 3. The College shall periodically review and test its fraud controls and update its indicators, verification methods, holds, monitoring, and reporting procedures in response to emerging risks and guidance from the University of Arkansas System, Arkansas authorities, or federal agencies.

X. Authority and Related Requirement

- 1. This policy shall be administered consistently with:
 - a. UAEACCP 500.1.1 Admissions Policies and Requirements;
 - b. University of Arkansas Board of Trustees Policy 350.1, Fraud Policy;
 - c. University of Arkansas System Fraud Risk Notification Alert AN2026-01 and subsequent University of Arkansas System Internal Audit guidance;
 - d. Family Educational Rights and Privacy Act (FERPA);
 - e. Applicable Federal Student Aid laws, regulations, and guidance;
 - f. Applicable requirements of the U.S. Department of Education Office of Inspector General;
 - g. Applicable Arkansas Legislative Audit reporting requirements; an
 - h. Other applicable federal law, Arkansas law, University of Arkansas System policy, and institutional policy.
- 2. If this policy conflicts with controlling federal law, Arkansas law, regulation, or University of Arkansas Board of Trustees policy, the controlling authority shall govern.

Other Applicable Documents

UAEACCP 500.1.1 Admissions Policies and Requirements

University of Arkansas Board of Trustees Policy 350.1, Fraud Policy

University of Arkansas System Fraud Risk Notification Alert AN2026-01



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