



Inceptia Verification Policy and Procedure

The information provided herein will serve as the ongoing policy and procedure verification documentation to support verification services provided by Inceptia. Aid year specific information required by Inceptia will be acquired on a yearly basis.

PURPOSE

To establish policies and procedures for the verification process of an applicant's FAFSA information that clearly defines what responsibilities Montgomery County Community College or Inceptia will perform.

POLICY STATEMENT

Montgomery County Community College and Inceptia, our third-party servicer, will comply with federal regulations governing the verification process and will verify those applicants selected by the FAFSA Processing System (FPS). In addition to verifying these required items for FPS-selected applicants, Montgomery County Community College may choose to verify any other application items, requiring any reasonable documentation, in accordance with consistently applied School policies. Montgomery County Community College may require applicants other than those selected by the Department to verify FAFSA information. It may decide which applicants must provide documentation for any additional data elements and what constitutes acceptable documentation.

Montgomery County Community College must establish and use written policies and procedures for verifying an applicant's FAFSA information. These policies and procedures must include a clear explanation of the following:

- Documents required for verification – as outlined in the Dear Colleague Letter.
- Applicant responsibilities – including correction procedures, the deadlines for completing any actions required, and the consequences of missing the deadlines.
- Notification methods – how Montgomery County Community College will notify an applicant if his or her award changes due to changes in the applicant's SAI as a result of verification, and the time frame for such notification.

Verification will occur for your student population during which timeframe:

- Upon receipt of application
- Before making tentative aid offer
- After making tentative aid offer, but before confirming awards
- After the student accepts aid offer, but prior to making disbursements
- After first, but before making second disbursement for applicable federal programs (interim disbursements)

SUBSEQUENT ISIRS AND VERIFICATION TRACKING GROUP CHANGES

Montgomery County Community College financial aid office will be responsible for the review of ISIRs received after Inceptia has completed verification with the exception of when an applicant is moved from a previously assigned Verification Tracking Group of V1 or V4 to V5.

Conflicting Information

When conflicting information is found between the information provided on the applicant's application and documents available at the School concerning the applicant's eligibility, which are collected or information obtained verbally, it will be resolved by the party (either the School or Inceptia) that detects the discrepancy. No disbursements will be made unless the conflict is resolved.

WRITTEN POLICIES AND PROCEDURES MUST INCLUDE

- a) Time Period – The time period within which an applicant must provide any documentation requested by Montgomery County Community College's third-party servicer, Inceptia, is collected on an annual basis.
- b) Acceptable Documentation – Montgomery County Community College and Inceptia will request and process documentation required for verification in accordance with **§668.57, and any pertinent Dear Colleague Letters and Electronic Announcements released by the Department of Education.**
- c) Unusually Low Income Situations – Those applicants that reported income below the U.S. Poverty Guidelines on the Free Application for Federal Student Aid (FAFSA) will be required, upon request, to document how they supported themselves for the applicable base income year.
- d) Consequences – The consequences of the applicant's failure to provide the requested documentation within the specified time period will include forfeiture of federal aid for the specified aid year.
- e) Notification Method – Inceptia will notify the applicant when the verification process has been completed by the communication method the applicant set up on the Verification Gateway profile. The School will notify the applicant of any aid revisions that resulted from verification via

(e.g., written notice, email, etc.), if, as a result of verification, the applicant's SAI changes and results in a change in the amount of the applicant's assistance under the Title IV, HEA programs.

- f) ISIR Correction Method – Inceptia will electronically submit to the FPS data elements Inceptia has determined to be in error and will verify that those corrections were made upon the receipt of the new ISIR transaction record.
- g) Professional Judgment (PJ) – If an applicant is selected for verification, he/she is required to complete the verification process before the School may exercise any professional judgment authority under section 479(a) of the HEA to make changes to the applicant's cost of attendance or to the data elements required to calculate the SAI.
- h) Post-Verification – When Inceptia completes verification for an applicant, the ISIR transaction number is locked in the Verification Gateway system and Inceptia will notify the applicant and the school that verification has been completed. The applicant will be notified by the communication preference requested within Verification Gateway and the school via a flat file. Inceptia will not review subsequent ISIRs received by the school and Inceptia after the initial verification has been

completed with the exception of cases when the Verification Tracking Group has changed to the V5 Verification Tracking Group.

- i) V4/V5 Reporting – Inceptia will complete V4/V5 reporting to the Department of Education on a monthly basis beginning the month following the start of verification.

Applicants may be moved from previously assigned Verification Tracking Groups V1 or V4 to Verification Tracking Group V5. **For these cases only**, the applicant's verified ISIR record will be unlocked in Verification Gateway at Inceptia and requests will be sent out for documentation required for the new Verification Tracking Group. The applicant is only required to submit documentation for the additional items required for the V5 Verification Tracking Group that were not previously submitted and verified.

Conflicting Information Resolution - When conflicting information is found between the information provided on the applicant's application and documents available at the School, it will be resolved by the party (either the School or Inceptia) that detects the discrepancy.

In all cases, the applicable staff member must document in detail the discrepancy, the documentation requested to resolve the situation, and ultimately the resolution decision for audit purposes. Any situations that may constitute potential fraud will be reported to the School for further investigation and possible referral to the Office of Inspector General in accordance with the School's Title IV OIG Referral Policy and Procedure. If the resolution results in a change in financial aid eligibility, the applicant will be notified via a revised award notice.

RESPONSIBILITIES

In addition to the Inceptia Vice President of Financial Aid Operations please identify individuals and/or offices responsible for developing and updating this document.

First Name: *Christal*
Last Name: *Chatman*
Title: *Director of Financial Aid*
Address: *340 DeKalb Pike Blue Bell PA 19422*
Phone: *215 619 7330*
Email: *cchatman@mc3.edu*

First Name:

Last Name:

Title:

Address:

Phone:

Email:

DEFINITIONS §668.52

Please identify acronyms or definitions that will be used in this document. Include hyperlinks, if available.

REFERENCES TO OTHER PUBLICATIONS

Policies and Procedures: 34 C.F.R. §668.53

Federal Regulations 34 C.F.R. §668.16(b)(3), §668.16(f), §668.54(a)(3), §Subpart E (668.51- 668.61), all pertinent Dear Colleague Letters and Electronic Announcements released by the Department of Education, Frequently Asked Questions – Verification, Federal Student Aid Handbook (when available).

REFERENCES AND RESOURCES

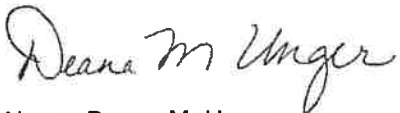
- FSA Assessment: A Guide to Creating a Policies & Procedures Manual
- FSA Assessment: Verification

IN WITNESS WHEREOF, the parties have executed this Inceptia Verification Policy and Procedure document as of the Effective Date below.

**Montgomery County Community College,
an institution of higher education**

Inceptia, a Nebraska corporation

By: 
Name: Christal Chatman
Title: Director of Financial Aid

By: 
Name: Deana M. Unger
Title: Vice President & Chief Operating Officer

Date: 3/26/2024

Date: January 11, 2024

Revised Date (if necessary):



Title IV OIG Referral Policy and Procedure

PURPOSE

To establish Montgomery County Community College and Inceptia policy and procedures to refer potential cases of Title IV fraud to the Office of Inspector General (OIG) of the U.S. Department of Education.

POLICY STATEMENT

Montgomery County Community College and Inceptia, our third-party servicer will comply with federal regulations governing the reporting of Title IV fraud referrals to the OIG for investigation once the School and/or Inceptia has conducted an investigation as to whether the applicant, student or employee has engaged in fraud or criminal misconduct.

Applicants/Students

After conducting a review of verification documents, any credible information indicating that an applicant of Title IV, HEA program assistance may have engaged in fraud or other criminal misconduct in connection with his/her application will be reported. The type of information that a School must refer is that which is relevant to the eligibility of the applicant for Title IV, HEA program assistance, or the amount of the assistance. Examples of this type of information are:

- False claims of independent status
- False claims of citizenship
- Use of false identities
- Forgery of signatures or certifications
- False statements of income

Employees/Third-party Servicers

After conducting a review of the information available, credible information indicating that any employee, third-party servicer, or other agent of the School that acts in a capacity that involves the administration of the Title IV, HEA programs, or the receipt of funds under those programs, may have engaged in fraud, misrepresentation, conversion or breach of fiduciary responsibility, or other illegal conduct involving the Title IV, HEA programs will be reported. The type of information a School must refer is that which is relevant to the eligibility and funding of the School and its applicants/students through the Title IV, HEA programs.

Montgomery County Community College will report any potential instances of fraud involving employees, third-party servicers, or other representatives involved in the administration of Title IV aid. In the event that the Director of Financial Aid is implicated in potentially fraudulent activity, the referral will be made directly to the Montgomery County Community College's President/CEO. Please identify the individual that should be contacted for this purpose.

First Name: Victoria
Last Name: Bastecki - Perez
Title: President
Address: 340 Decalb Pike, Blue Bell PA 19422

Phone: 215 641 6482
Email: vbasteck@mc3.edu

PROCEDURE

Inceptia will make detailed written referrals of potential fraud or other criminal misconduct to the Director of Financial Aid, who will make a report to the President/CEO after investigating the documents. In all cases, Montgomery County Community College's President/CEO will report to the OIG based upon their School's written policy and procedure. The School will fully comply with any requests from the OIG to support in the investigation.

DEFINITIONS §668.52

Please identify acronyms or definitions that will be used in this document. Include hyperlinks, if available.

REFERENCES TO OTHER PUBLICATIONS

Policies and Procedures: C.F.R. §668.16(g) and §668.53(a)(5)


Federal Regulations 34 C.F.R. §668.16(g), §668.53(a)(5), and §668.25(c)(2).

REFERENCES AND RESOURCES

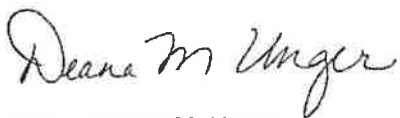
- [OIG Reports and Resources](#)
- [OIG Hotline – Fraud Prevention](#)
- [OIG Regional Office Contacts](#)

IN WITNESS WHEREOF, the parties have executed this Title IV OIG Referral Policy and Procedure document as of the Effective Date below.

**Montgomery County Community College,
an institution of higher education**

By: 
Name: Christal Chatman
Title: Director of Financial Aid
Date: 3/25/2024

Inceptia, a Nebraska corporation

By: 
Name: Deana M. Unger
Title: Vice President & Chief Operating Officer
Date: January 11, 2024

Revised Date (if necessary):