



## ADMINISTRATIVE POLICY

### Fraud Prevention Policy (AP1-2020)

Reference Information: 34 CFR 668.16(g); Dear Colleague Letter (GEN-11-17)

**Fraud Definition:** The willful misrepresentation or falsification of information for the purpose of securing financial support that the individual is not eligible for or not eligible to the extent received. Generally, fraud is an intention to deceive Palau Community College in order to obtain an advantage, avoid an obligation or cause loss to the college.

This policy applies to any irregularity or suspected irregularity involving students, employees, vendors, contractors, consultants, and any other parties with a business relationship with Palau Community College. If an investigation activity will be conducted, it will be conducted without regard to any individual relationship to Palau Community College, his/her position and his/her length of service.

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## POLICY STATEMENT

In order to protect the integrity of Palau Community College Federal Title IV, the Republic of Palau appropriations, and the College financial programs, the institution complies with all existing statutory and regulatory requirements to handle its financial activities. Its financial activities include the disbursement of aid only to eligible students, to disburse payment only to official service invoices, and to purchase only to support and ensure student learning and institutional effectiveness. Palau Community College must report any suspected fraud to the Office of the Inspector General of the U.S. Department of Education. The three departments of the institution (Education & Training, Administration & Finance and Cooperative Research & Extension) share the responsibility of fraud prevention.

### Information Fraud:

Office of Admissions & Records (Registrar) – responsible for monitoring and resolving discrepancies in the information received from different sources with respect to student application for admission and student academic records; responsible to protect correct student information in compliance with the U.S. Family Educational Rights and Privacy Act (FERPA); and responsible to be the only office of the institution that provides student official record. Any suspected fraud, report to the Dean of Student Services.

Office of Financial Aid – responsible for monitoring and resolving discrepancies in the information received from different sources with respect to student application for financial aid; to report any suspicious activity to the Office of the Inspector General of the U.S Department of Education including any student, employee, or other individual who may have misreported information and/or have altered documentation to increase/decrease student aid eligibility or to fraudulently obtain federal funds. Any suspected fraud, report to the Office of Inspector General of the U.S. Department of Education.



Academic Faculty – responsible for all credit-bearing courses and programs offered through traditional (face-to-face) and distance education methods; responsible to verify that the student who registers for any distance education courses is the same student who participates in and completes the course and receives academic credit; and responsible to protect student academic record in compliance with the U.S. Family Educational Rights and Privacy Act (FERPA). Any suspected fraud, report to the Dean of Academic Affairs.

Business Office – responsible to handle all business transactions following college established procedures defined within the college Administrative Procedures Manual; responsible to verify all applicable documentation prior to disbursement of college funds; and responsible to verify student identification before issuing student refunds. Any suspected fraud, report employee to Vice President of Administration and Finance, and report student to the Office of Financial Aid and to the Dean of Student Services.

Disciplinary Action (refer to):	<p>PCC Personnel Rules and Regulations Manual  Revision – October 2005  Employee Discipline  14.3 Formal Disciplinary Action</p> <p>PCC Student Code of Conduct and Sanction  C. Violation of Other Existing College Rules and Regulations</p>
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