

NOVA SOUTHEASTERN UNIVERSITY
University Policy

Policy Title:	Reporting Financial Aid and Academic Record Fraudulent Activity Policy
Policy Area:	Financial Aid
Responsible Executive:	Provost/Vice President Academic Affairs and Vice President of Financial Aid & Academic Records
Responsible Policy Officer:	FAAR Compliance Director
Original Effective Date:	March 17, 2025
Last Revision Date:	
Last Review Date:	
Next Review Date:	As Needed

RATIONAL

Federal financial aid regulations require institutions administering Title IV, HEA programs to report credible fraudulent financial aid activity to the U.S. Department of Education (ED).

POLICY

Financial Aid

I. Student Fraud

- A. Applicants for Title IV, Higher Education Act of 1965 (HEA) financial aid programs suspected of fraud or other criminal misconduct related to Title IV, HEA programs must be reported to Financial Aid and Academic Records' (FAAR) Executive Leadership, who must report the applicant(s) to the ED Office of the Inspector General (OIG), should legal counsel deem the activity fraudulent.
- B. Examples of fraud or other criminal misconduct include, but are not limited to:
 1. Falsified documents or forged signatures on applications, certifications, verification documents, or loan promissory notes
 2. False statements of income
 3. False statements of citizenship
 4. Use of false or fictitious names or aliases, addresses, or SSNs, including the deliberate use of multiple SSNs
 5. False claims of independent status
 6. False educational experience records (e.g., school credentials such as a high school diploma)
 7. Receipt of financial aid without the intent of use for educational purposes or intent to complete academic requirements
 8. False direct deposit/banking information

9. Manipulation of university's registration system schedule with intent to receive financial aid without participating in academic activities.

II. Employees and Third-Party Fraud

Any credible information indicating an employee of Nova Southeastern University (NSU), third-party servicer, or other agent of the university involved in the administration of Title IV, HEA programs may have engaged in fraud, misrepresentation, breach of financial responsibility, or other illegal conduct involving Title IV, HEA programs must be reported to FAAR Executive Leadership, who must report the suspected fraudulent activities to the ED OIG, should legal counsel deem the activity fraudulent.

III. Financial Aid Reporting Requirement

Any employee, third-party servicer, or other agent of the university is obligated to report suspected Title IV, HEA programs fraudulent financial aid activities to FAAR Executive Leadership, who must report the activities to the ED OIG, should legal counsel deem the activity fraudulent.

Academic Records

Any employee, third-party servicer, or other agent of the university is obligated to report suspected fraudulent activities and other criminal misconduct related to academic records/credentials to the University Registrar. The Registrar will review the suspected fraudulent activity and report the activity to university executive leadership of other university offices as appropriate dependent upon the type of violation (i.e., Office of Human Resources, Provost's Office, Office of the Dean of Students, Athletics, etc.). The Registrar will also review the suspected fraudulent activity to determine if the activity is related to Title IV, HEA programs. If the activity is related to Title IV, HEA programs, the Registrar is responsible for reporting the suspected fraudulent activities to FAAR Executive Leadership, who must report the activities to the ED OIG, should legal counsel deem the activity fraudulent.

SCOPE

All faculty, staff, administrators, third-party servicers, and other agents of the university.

COMPLIANCE CONTACT

FAAR Director of Compliance
goldeva@nova.edu
(954) 262-7454

ENFORCEMENT

All employees with responsibilities under this policy are expected to be thoroughly familiar with their obligations. Failure to comply with this policy may result in disciplinary action pursuant to all applicable university policies and procedures.

EXTERNAL REFERENCES

[34 C.F.R. § 668.16\(f\)](#)

[34 C.F.R § 668.16\(g\)](#)

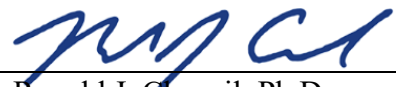
APPROVAL



Harry K. Moon, M.D.
President & Chief Executive Officer

June 26, 2025

Date



Ronald J. Chenail, Ph.D.
Executive Vice President, Provost and
Chief Academic Officer

June 26, 2025

Date

APPROVED AS TO ACADEMIC CONTENT



Stacy Peña-Villalobos, Ed.D.
Vice President, Financial Aid & Academic
Records

June 26, 2025

Date