



ACUA
Association of College
& University Auditors

March 24-26, 2026

ACUA VIRTUAL SPRING SUMMIT

Audit in Action



Ghost Students – Identification & Mitigation



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Objectives

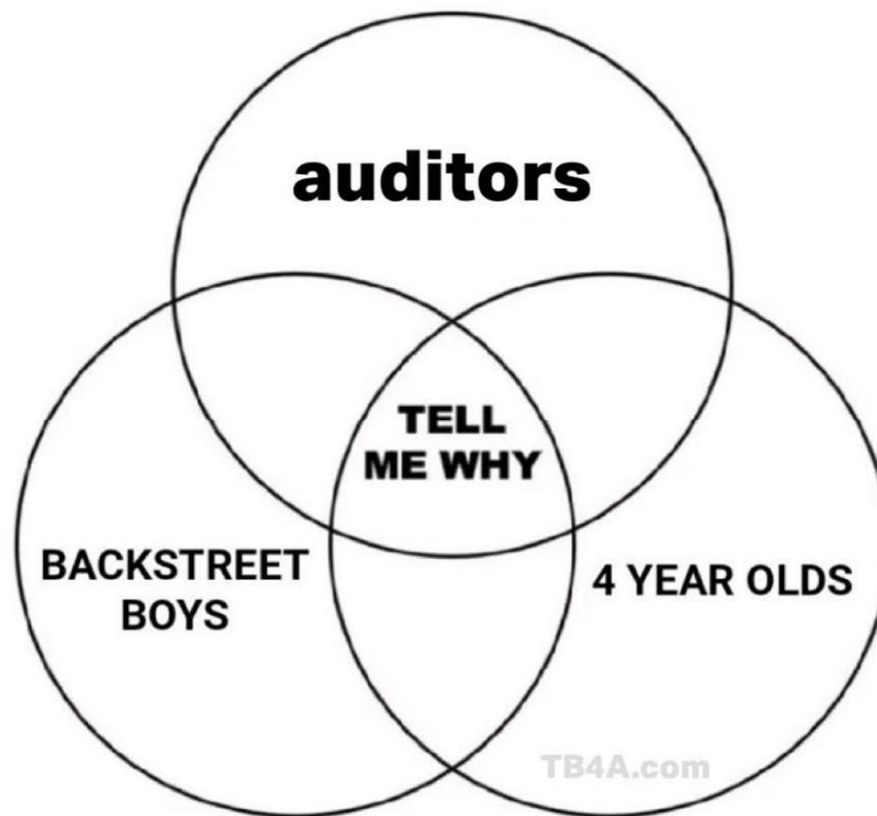
- Understand the risks related to ghost students.
- Analyze data to develop criteria for identification of ghosts.
- Mitigate ghosts already in the system.
- Develop controls to detect, respond, and prevent future ghosts.
- Educate your campus.



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Ghost students haunt Western

Posted Thursday, February 26, 2026 1:50 am

“As soon as they recognize we know they are fraudulent, they just disappear.”

LESLIE TAYLOR

Ghost students scam community colleges by stealing financial aid

OCT 29 2024

SECURITY Student Services has created new policies campuswide to combat AI scammers impersonating real students.

Wh By Rosemary Villalonga, News Editor



How Do They Operate?

AL

What's a ghost student? Scam cost \$350 million in fake student loans, grants

Williesha Morris

Wed, February 25, 2026 at 1:14 PM CST

1 min read

Add Yahoo on Google



Scammers are using AI to steal college financial aid

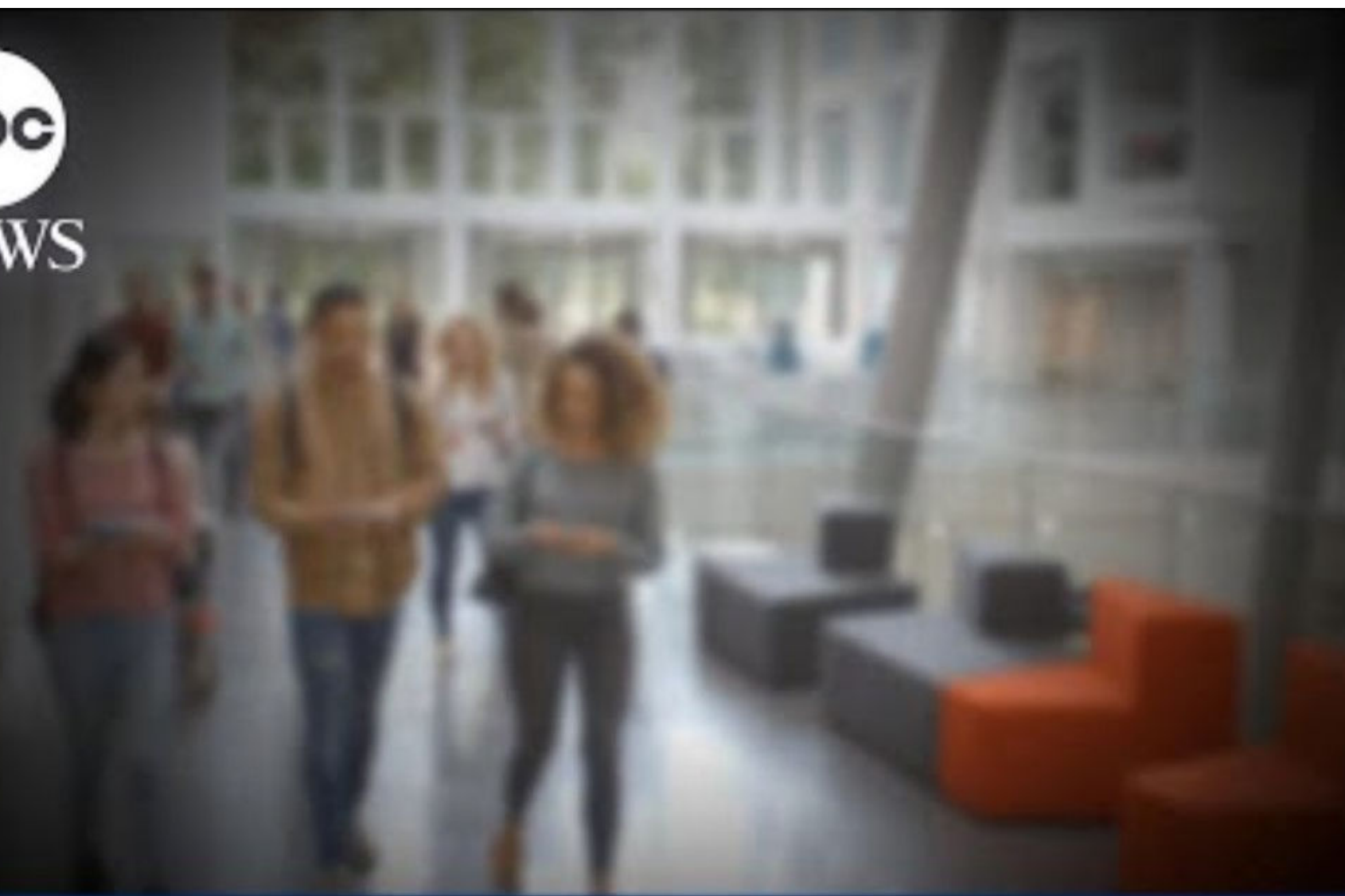


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abc
NEWS



Federal Student Aid Losses

Ineligible recipients:

**\$90
million**

Deceased individuals:

**\$30
million**



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What are the risks?



Financial



Compliance



Cybersecurity



Operations



Reputation



Strategic



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Who is doing this?



This Photo by Unknown Author is licensed under CC BY

- Organized fraud
- Scammers
- Robots
- AI bots
- Collusion

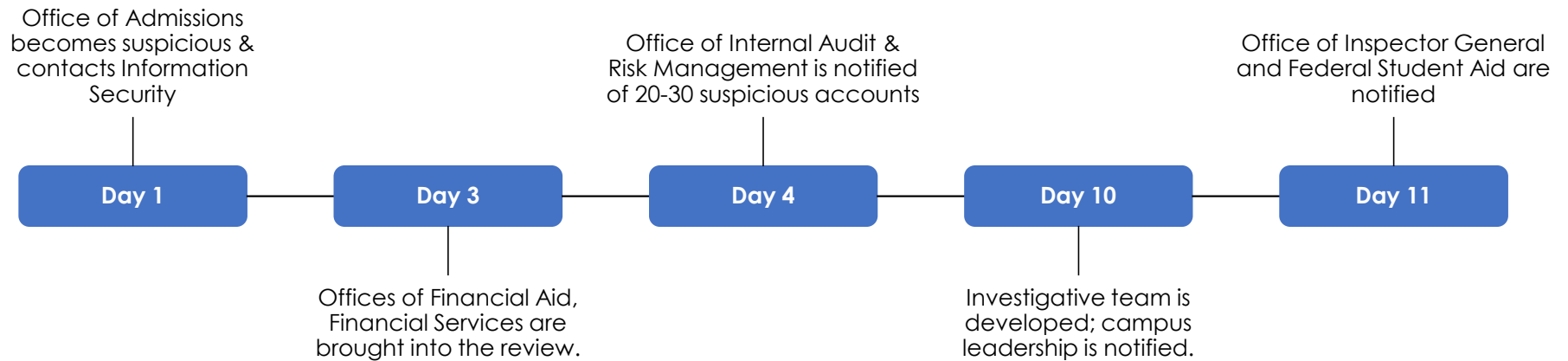


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Example case study



Where do you start?



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Data Analytic Brainstorming

- Created Date & Time
- Submitted Date & Time
- Application Entry Semester
- Application Status
- Decision
- Registered Indicator
- Name (First, Middle, Last)
- Preferred Name
- Address
- Email Address
- Social Security Number
- Login IP Address
- Phone Numbers
- Birthdate
- City of Birth
- Military Status
- Academic Program Campus
- Academic Program
- Application Source



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Data Analytic Brainstorming

Registrar

- Registration Date
- Registration Type
- Course Selection
- Course Duration
- Instructional Method
- Prior Registration

Information Security

MFA Type

Phone Number

Advising

- Advisor Notes
- Meeting types
- Emails

Financial Services

- Refund Amount
- Bank Account
- Recent Changes

Financial Aid

- FAFSA
- Student Aid Index
- Packaged Aid
- Disbursed Aid
- Holds
- Aid Type
- Aid Amount



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Other Sources of Information

- National Student Clearinghouse
- Whitepages.com
- Iplocation.net
- **Collaboration with the team!!!!!!**



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Criteria

- Age 25+
- No previous name
- No middle name
- No preferred name
- SSN provided
- Green Dot Bank
- Slate Application
- Mail.com or Outlook.com
- SVR, VOIP, or PSTN carrier
- Out of State resident
- Non-traditional classification
- Data Camp, Cogent, or Cyber Assets IP
- General Business, Social Work, or Psychology
- Online Program



Detective Controls

- Data analytics
- V4 & V5 verifications
- ID Verification
- Extend timelines where able
- Advising modality
- Red flags policy
- Faculty report mechanism
- Send mail
- Software
- Collaborate
- Educate



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Preventive Controls

- Data analytics
- Application fees
- Deny admissions
- Flags
- V4 & V5 verification
- ID verification
- Policy improvement
- Block duplicate attempts



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Ghost Busting – What to do when you find a ghost.



1. Report
2. Reject
3. Revoke
4. Report
5. Review



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Education is key!



Admissions



Financial
Aid



Financial
Services



Information
Security



Advisors



Faculty



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