MEMORANDUM

April 24, 2023

TO: State Board Members

        WACTC Presidents

FROM: Grant Rodeheaver, SBCTC Deputy Executive Director/CIO, IT Division

RE: Mitigating Enrollment Fraud – Instructional Practices & Reporting Obligations

This memorandum will be forwarded broadly to related councils, commissions, ctcLink governance, and ctcLink support lists.

The past three years have presented numerous challenges as staff have continued supporting admissions, enrollment, and general student services throughout the pandemic. The increase in remote course delivery has, unfortunately, contributed to an increase in external efforts by bad actors to undermine cyber integrity and has led to an increase in fraudulent activity.

The Washington State Board for Community and Technical Colleges (SBCTC) is committed to fraud detection and prevention while minimizing the potential impact to students and staff.

SBCTC Student Services, Business Operations, and Information Technology divisions, as well as Instruction Commission leadership, collaborated to develop the guidance and technical measures for fraud mitigation and prevention as outlined below.

The attached guidance document outlines the types of fraud currently affecting the system, the role the colleges and SBCTC play in fraud detection and mitigation, and the partnership required to ensure fraud prevention protocols are not inadvertently harming students.

Types of Fraud

This memo outlines the types of fraud currently affecting the system, the role the colleges and SBCTC play in fraud detection and mitigation, the partnership required to ensure fraud prevention protocols are not inadvertently harming students, and instructions for colleges and SBCTC staff.

As part of the continued effort to characterize fraud, three related but different types of fraudulent activity have been identified:

Admissions application fraud

The act of creating a ctcLink account, submitting an application via the Online Admissions Application Portal (OAAP), and completing the application process with the college without the intent to attend college for educational purposes.

Enrollment fraud

The act of registering for classes without the intent to legitimately attend follows admissions application fraud and can only occur once a college has accepted the admissions application and enabled access to registration.

Financial aid fraud

Financial aid-related fraud occurs after a college has accepted a fraudulent admissions application, allowed the fraudulent student to register for classes, and begins the process of disbursing local, state, and/or federal financial aid.

Fraud Detection & Mitigation Strategies

Fraud detection relies on colleges for early identification, confirmation, and reporting of non-responsive, non-participating enrolled students. Preventing fraud without setting up additional barriers for real students requires a student-centered approach that engages the entire community.

While there is a decidedly human interface to admissions and financial aid activities, fraud prevention strategies also include technology solutions and processes designed to flag suspicious patterns.

Addressing both types of fraud will be an ongoing and long-term project for all system stakeholders. In the short-term, colleges are encouraged to take proactive steps to protect themselves, their students, and the entire system.

SBCTC will continue to work with the colleges to develop and refine fraud monitoring processes and reporting.

Institutional Practices

Fraud reporting resources and detailed instructions can be found at the SBCTC website under ctcLink Support.

- Report Fraud: Reporting Admissions & Financial Aid Fraud
  - What to Do When a Fraudulent Application is Suspected: Steps to Take When a Fraudulent Admissions or Financial Aid Application is Suspected
  - Enrollment Fraud Mitigation: Faculty and Staff Share Critical Roles in Enrollment Fraud Mitigation
  - Student-Centered Approach: A Student-Centered Approach to Fraud Detection

For details and requirements for all colleges, refer to:

- Reporting Fraudulent Applications and Student Accounts to SBCTC quick reference guide

- Mitigating Enrollment Fraud – Instructional Practices & Reporting Obligations guidance document (attached)

Please reach out to Dani Bundy, ctcLink Customer Support Director, if you have questions or feedback.

Thank you,

-Grant

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