

19-116 Student Status

We have completed our audit of the student status update process. This audit was performed at the request of the UTHealth Audit Committee and was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

BACKGROUND

The Registrar's Office is responsible for reporting enrollment data for all six schools at UTHealth. The schools include the McGovern Medical School (MMS), School of Dentistry (SOD), Cizik School of Nursing (CSON), School of Public Health (SPH), School of Biomedical Informatics (SBMI) and the Graduate School of Biomedical Sciences (GSBS). Students initiate enrollment status changes (i.e. withdrawals and leaves of absences) with forms processed through their School's Student Affairs or Academic Affairs Office.

Registrar's Office staff are responsible for day-to-day processing of enrollment changes in collaboration with each school to ensure timely reporting. These changes are recorded in Campus Solutions, the university's official student information system. Enrollment data, including status updates, from Campus Solutions is reported monthly to the National Student Clearinghouse (NSC), the university's third-party servicer. NSC provides updates to the National Student Loan Data System (NSLDS) through monthly electronic submission. NSLDS is the U.S. Department of Education's central database for student aid.

OBJECTIVES

To determine whether controls around student status updates are adequate and in accordance with federal guidelines.

SCOPE PERIOD

The scope period was the most recent completed academic year as of September 2019.

METHODOLOGY

The following procedures were performed:

- Reviewed school-based policies and/or procedures related to the withdrawal process to determine whether they are clearly defined and documented. This included a review of documented procedures, verification/documentation of last day of attendance, and notification processes.
- Reviewed policies and/or procedures related to the leave of absence process at each school to determine whether they are clearly defined and documented. This included a review of documented procedures, requirements for approval, determination of effective date, monitoring processes, and notification processes.
- Reviewed processes to identify and report students who unofficially withdraw without providing official notification.

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- Reviewed processes for reporting enrollment status, including status changes and error corrections, to the federal database.
- Selected a sample of enrollment reports and error reports, reviewed for compliance with reporting guidelines, and documented procedures.
- Selected a sample of MMS and SOD students taking leave of absence from university and reviewed for:
 - Compliance with federal regulations for enrollment reporting
 - Compliance with documented procedures for approval, supporting documentation, monitoring for timely return, and notification of approval
 - Accuracy of program enrollment status for dual degree students (if applicable)
 - Timeliness of processing status change
- Selected a sample of students from each School (if any) withdrawing from all classes at the University and reviewed for:
 - Compliance with federal regulations for enrollment reporting
 - Compliance with documented procedures for supporting documentation and notification of withdrawal
 - Timeliness of processing status change
- Selected a sample of students with failing or incomplete grades, reviewed for compliance with reporting guidelines, and documented procedures for determination of unofficial withdrawals.
- Selected a sample of CSON students and reviewed for compliance with documented procedures for monitoring non-enrollment.

AUDIT RESULTS

A&AS identified the following areas for improvement:

- The enrollment statuses for students on approved leave of absence were not accurately or timely updated. In addition, the listing of students is not verified for accuracy or completeness by the applicable Schools.
- The enrollment status for students determined to be unofficial withdrawals were not accurately or timely updated. In addition, the query reports used for determination were not retained.

NUMBER OF PRIORITY FINDINGS REPORTED TO UT SYSTEM

None

We would like to thank the staff and management who assisted us during our review.



Daniel G. Sherman, MBA, CPA, CIA
Associate Vice President & Chief Audit Officer

MAPPING TO FY 2019 RISK ASSESSMENT

Risk (Rating)	<p>Changes in student status may not be accurately reported. (Medium)</p> <p>Inefficient processes in monitoring student status may require unexpected financial aid paybacks. (Medium)</p> <p>Student may not receive refund due to them as a result of change in status. (Medium)</p>
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DATA ANALYTICS UTILIZED

Data Analytic #1	None
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AUDITING & ADVISORY SERVICES ENGAGEMENT TEAM

AVP/CAO	Daniel G. Sherman, MBA, CPA, CIA
Audit Manager	Nathaniel Gruesen, MBA, CIA, CISA, CFE
Auditor Assigned	Chandra Jones, CPA, CHIAP
End of Fieldwork Date	February 25, 2020
Issue Date	May 26, 2020

Copies to:

- Audit Committee
- Dr. Diane Santa Maria (CSON)
- Dr. Barbara Stoll (MMS)
- Dr. Michael Blackburn (GSBS)
- Dr. Jiajie Zhang (SBMI)
- Dr. John Valenza (SOD)
- Dr. Eric Boerwinkle (SPH)
- Michael Tramonte
- Robert Jenkins

Issue #1	<p><u>Leave of Absence</u></p> <p>34 CFR § 668.22(d) states that an institution does not have to treat a leave of absence as a withdrawal if it is an approved leave of absence. The eight conditions for an approved leave of absence are: 1) the institution has a formal policy for LOA, 2) the student requests a LOA following the policy, 3) there is a reasonable expectation of the student returning, 4) the institution approves the LOA following the policy, 5) the LOA involves no additional charges, 6) the LOA does not exceed 180 days in a 12-month period, 7) the student can complete coursework began prior to the LOA, and 8) the effects on loan repayment for failure to return from LOA are provided to the student prior to LOA approval.</p> <p>34 CFR § 668.22(d) and the Federal Student Aid Handbook Volume 5, Chapter 1 requires students that do not return within 180 days from a leave of absence to be treated as a withdrawal.</p> <p>The Registrar’s Office is responsible for enrollment reporting for the university based on information received from each of the schools. The McGovern Medical School (MMS) and School of Dentistry (SOD) are the only Schools with reported LOAs, and each respective school has its own departmental LOA policies and procedures on how to request, approve, and notify the Registrar’s Office of approved LOA requests. The remaining academic schools report LOA for extended periods as withdrawals. Each school is responsible to ensure their respective LOA policy meets the federal requirements for reported approved LOA.</p> <p>The Registrar’s Office maintains a spreadsheet of LOA for medical and dental students on LOA by term year for tracking and monitoring purposes. This spreadsheet is updated based on the approved LOAs received from the respective schools. MMS utilizes a Student Affairs Portal that automates the processing of LOA requests, storing supporting documentation, and notification of approved requests. Conversely, the process at SOD is manual. Based on our testing, we noted the following:</p> <ul style="list-style-type: none"> • The MMS and SOD have not developed a process to verify with the Registrar’s Office the accuracy or completeness of processed LOAs. <p>A&AS selected a sample of ten students listed on leave of absence with the MMS or SOD at UTHealth during a the 2018-2019 school year and noted the following:</p> <ul style="list-style-type: none"> • Three student’s enrollment status were not accurate. <ul style="list-style-type: none"> ○ Two of three students on a leave of absence that did not exceed 180 days, were incorrectly updated by the Registrar’s Office as “Withdrawn” instead of “Approved Leave of Absence” for external enrollment reporting although it was accurately updated in the university’s student information system. ○ One of three students dismissed by the SOD was updated by the Registrar’s Office as “Withdrawn” instead of “Dismissed” in the
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	<p>university’s student information system but accurately reported as dismissed for external enrollment reporting.</p> <p>A&AS also selected a sample of 15 MMS students on LOA from an independent listing obtained from the MMS Student Affairs Portal. The following was noted:</p> <ul style="list-style-type: none"> • Four student’s enrollment status were not accurate. <ul style="list-style-type: none"> ○ One of the four students on LOA was not reported to the Registrar’s Office by MMS and as a result, the enrollment status had not been updated. In addition, this LOA request was approved by MMS more than 60 days after the effective start date. ○ Three of the four students on a leave of absence that exceeded 180 days, were incorrectly updated by the Registrar’s Office as an “Approved Leave of Absence” instead of “Withdrawn”. • Three students on LOA were reported by MMS to the Registrar’s Office more than 60 days after the LOA approval and effective date. <p>A&AS was unable to select a sample of students on LOA from an independent listing from SOD because the Office of Student and Academic Affairs (OSAA) does not maintain a listing of students on LOA.</p>
<p>Recommendation #1</p>	<p>We recommend MMS and SOD:</p> <ol style="list-style-type: none"> a) Work with the Registrar’s Office to ensure each school’s LOA policy and procedures meet the conditions of an approved leave of absence, including retaining notification of effects of failure to return, written documentation of LOA request/approval, and expectation of student’s return; b) Work with the Registrar’s Office to develop and implement a process to ensure the notifications of students going on and/or returning from approved LOAs are received timely by the Registrar’s Office for enrollment reporting; c) Implement a process to ensure the Registrar’s Office receives an accurate and timely listing of students on LOA. This process should include activities such as verifying their listing with the applicable School’s Student Affairs Department for completeness; and <p>In addition, we recommend MMS:</p> <ol style="list-style-type: none"> d) Work collaboratively with the Registrar’s Office and IT Academic Technology Department to review the current capabilities of the MMS Student Affairs Portal system related to the enrollment status process to ensure all required data is captured and reported timely and accurately.
<p>Rating</p>	<p>Medium</p>
<p>Management Response</p>	<ol style="list-style-type: none"> a) MMS will review the existing Leave of Absence policies and procedure to ensure they meet the conditions of approved leave of absence as well as other applicable federal guidelines. (MMS) <p>The SOD will schedule to meet with the Registrar to examine current Leave of Absence policies and create a more effective method of promptly</p>

	<p>listing any LOA, notifying the Registrar’s Office of such LOA, reporting any failure to return from LOA, and having a better documentation process in place to store all written documentation as it relates to LOA. A check off form will be generated that lists each step along the way of how a LOA should be generated, reported, and stored to ensure that proper policy is being adhered to. (SOD)</p> <p>b) MMS will develop a process to ensure that all approved LOAs and returns from LOAs are reported in a timely manner for enrollment reporting. (MMS)</p> <p>As mentioned in the previous response, creating a check off procedure sheet delineating what happens upon receipt of a request for LOA will be generated and help with ensuring that any LOA is reported in a timely manner for enrollment reporting. (SOD)</p> <p>c) MMS will work with the Registrar’s Office to create a verification process to ensure that an accurate list is maintained. (MMS)</p> <p>In working with the Registrar to create a new process of reporting, this should ensure that an accurate list is being maintained. (SOD)</p> <p>d) MMS will work with the Registrar’s Office to determine enrollment data that should be captured for reporting. MMS will also meet with IT Academic Technology Department to review current capabilities and update the MMS Student Affairs Portal system as needed.</p>
Responsible Party	<p>Yolanda Bell, Assistant Director – Admissions & Student Affairs (MMS)</p> <p>Dr. Robert Spears, Associate Dean for Student and Academic Affairs (SOD)</p> <p>Sonya Davis, Coordinator II – Educational Programs (SOD)</p>
Implementation Date	<p>August 1, 2020 (MMS)</p> <p>August 10, 2020 (SOD)</p>

Issue #2	<p><u>Unofficial Withdrawals</u></p> <p>34 CFR § 668.22(c) and the Federal Student Aid Handbook Volume 5, Chapter 2 states that students that the effective date of withdrawal for students that cease attendance without providing official notification is the last day of attendance at an academically-related activity, if documented, or the mid-point of the enrollment period.</p> <p>According to the NSLDS Enrollment Reporting Guide, institutions participating in Title IV federal aid must certify the enrollment of all students on its roster at least every two months (“every 60 days rule”). Schools are required to report details about the student (name, social security number, demographic), campus-level enrollment (enrollment status and the effective date of that enrollment status), and program(s) of attendance (Classification of Instructional Programs code, Program Credential Level, Program Length, Program Enrollment Status).</p>
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	<p>The Registrar’s Office is responsible for making determinations of unofficial withdrawals. Unofficial withdrawal processing is part of the Registrar’s Office enrollment reporting and is included in written departmental procedures. The procedures include running query reports at the end of each academic term to determine potential unofficial withdrawals (students with failing or incomplete grades), requesting/obtaining information from the applicable School’s Student Affairs department for verification, and updating applicable student’s enrollment status.</p> <ul style="list-style-type: none"> • The query reports are used for analysis and updated to create the tracking spreadsheet with information received from the Schools. The original report is not saved for review, and the results may vary from the initial query report used for analysis when run later. <p>A&AS selected a sample of 22 students who earned an incomplete or failing grade at UTHealth during a semester for the 2018-2019 school year and noted the following:</p> <ul style="list-style-type: none"> • Two of the twenty-two students’ enrollment status was updated more than 60 days after receipt of the status change notification from the School. • One of the twenty-two student’s effective withdrawal date was not accurate. <p>In addition, two of the twenty-two students were not included on the Registrar’s Office monitoring spreadsheet and not analyzed for determination of unofficial withdrawal. The students’ grades were indicated with “***”, which was not recognized by the query report.</p>
<p>Recommendation #2</p>	<p>We recommend Registrar’s Office:</p> <ol style="list-style-type: none"> a) Develop and implement a process to ensure the unofficial withdrawal query reports are retained for subsequent review; b) Develop and implement a process to ensure changes of status received after the end of semester enrollment reporting are updated within 60 days of receipt of the status change notification; c) Work with the IT Administrative Technology Department to review the capabilities of the Campus Solutions student information system related to the enrollment status process to ensure all necessary data is captured timely.
<p>Rating</p>	<p>Medium</p>
<p>Management Response</p>	<ol style="list-style-type: none"> a) The Office of the Registrar will retain copies of the unofficial withdrawal queries with the date the query is run. Subsequent queries for the same term will be maintained electronically. b) The Office of the Registrar will update a business process, which includes a weekly review of enrollment status changes by Registrar’s staff. Results of this review are shared with other stakeholders. c) The Office of the Registrar will work with the IT Campus Solutions Support Team to determine if updates or modification to current Campus

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	Solutions enrollment reports/processes will ensure that data is captured accurately & timely.
Responsible Party	Robert Jenkins, University Registrar Brenda Powers, Senior Associate Registrar
Implementation Date	a) May 15, 2020 b) May 15, 2020 c) August 1, 2020