

December 18, 2023

Washington State Student Services Commission Executive Board
Delivered Electronically

Dear Washington State Student Services Commission,

The Admissions and Registration Council (ARC) is writing to express the urgent need for additional action from the Washington State Board for Community and Technical Colleges (SBCTC) to address fraudulent records in ctcLink. Fraudulent records pose an extraordinary financial and legal threat to the Washington community and technical college system and impede the progress of non-fraudulent students, disproportionately impacting students of color, students with limited access to technology, and other disadvantaged groups.

SBCTC and the colleges must engage in a unified response because of the significant risks posed by this growing problem. ARC acknowledges that the workgroup convened by SBCTC has now scheduled monthly one-hour meetings. However, the group's structure and progress so far is insufficient to address this pressing need.

ARC is requesting the following steps be taken by SBCTC immediately:

- 1. Define the goals, priorities, and timelines for the workgroup, including setting target dates for specific objectives.**
- 2. Increase the meeting frequency and/or length so that more can be accomplished with each meeting.**
- 3. Assign a college representative to co-chair the workgroup alongside a SBCTC representative.** This will reduce the workload and responsibility of a single SBCTC representative managing this overwhelming project, and help ensure the colleges and SBCTC are fully aligned and collaborating effectively.
- 4. Focus on solutions that do not require manual intervention from college staff.** Current proposed solutions involve creating an additional section of the online application system which will require college staff to continue reviewing individual applications.
- 5. Assess the need for an RFP to engage a security expert who can drive this work.** SBCTC and college staff are not experts in fraud mitigation, forensic IT, or other skills required to adequately address the significant risks posed by the fraud occurring on our campuses.

These steps will require a significant investment of time, energy, and resources from colleges and from SBCTC. This investment is justified because we are already facing significant costs and liability as we attempt to manage the situation. The impacts of fraudulent records include:

- Tens of thousands of dollars awarded in financial aid funds – that we know of – to confirmed fraudulent accounts. Some of these cases involved stolen identities and there is no established process for notifying potential victims or law enforcement. It is

overwhelmingly likely that some successful fraud has not yet been identified, so the true dollar amount remains unknown.

- Fraudulent students enroll in classes, making classes appear full when they are not. Non-fraudulent students are left with fewer class options, making it more difficult to progress toward completion.
- Not all colleges require faculty to report non-attending students. Once fraudulent students are enrolled at these colleges, they will be counted for FTE and affect funding allocations even if they never participate in a class.
- Colleges are experiencing a significant increase in staff time allocated to detecting, investigating, and reporting fraudulent accounts, impacting other services. For example, many colleges have elected to stop using the ctcLink batch application processing functionality because weeding out fraudulent apps requires individual, manual review.
- The process of identifying and flagging accounts is inconsistent – and thus inequitable – among the colleges due to differences in staffing capacities and IT resources. This has an unacceptable impact on admissions/registration/enrollment processing for non-fraudulent students.
- Non-fraudulent students are being flagged as fraudulent by other colleges, instantly locking them out of all college systems with no warning or instructions on how to resolve the problem. Depending on the processes at the college applying the flag, it can be difficult and time consuming to determine the source of the flag, why it was added, and what action is required to remove it.
- SBCTC support staff field hundreds of fraud-related tickets requiring individual review and action, reducing their capacity to provide the system support that allows us to meet the needs of non-fraudulent students.

ARC looks forward to contributing to a response to this problem that will allow both SBCTC and the colleges to return to the important work of serving students.

Respectfully submitted,

Admissions and Registration Council Executive Board, on behalf of the membership of ARC:

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