



**TO:** Academic Senate for California Community Colleges  
Academic Senate Presidents  
Chief Instructional Officers  
Chief Student Services Officers  
Curriculum Chairs

**FROM:** Marty J. Alvarado, CCCCCO Executive Vice Chancellor  
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**RE:** Mitigating Enrollment Fraud – Instructional Practices & Reporting Obligations

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The past year has presented numerous challenges for students and colleges as they have supported the continuation of instruction throughout the pandemic. Unfortunately, the shift in course delivery format and remote work has contributed to an increase in external efforts to undermine cyber integrity and has caused an increase in fraudulent activity. The Academic Senate for California Academic Senate for California Community Colleges (ASCCC), the California Community College Chief Instructional Officers (CCCCIO), and the Chancellor's Office remain committed to the prevention of fraud while minimizing the potential impact to students. This memo details the types of fraud currently affecting the system, the role that faculty play in fraud detection and mitigation, and the partnership required to ensure fraud prevention protocols are not inadvertently harming students.

### Background

The Chancellor's Office has been made aware of the perceived increases in application fraud over the past few months and has been working to increase the security measures in place for fraud mitigation and prevention. Details related to admission application fraud and financial aid-related fraud can be found in the June 2021 guidance memo, [DII 21-200-02](#), issued by the Vice Chancellor of Digital Innovation & Infrastructure. However, as part of the continued effort to characterize points for fraud mitigation, three related but different types of fraudulent activity have been identified:

1. Admission application fraud, which occurs during the creation of a CCCApply account;
2. Enrollment fraud, which occurs after a college has accepted an admission application and enabled access and registration into one or more courses; and
3. Financial aid-related fraud, which occurs after a college has accepted an admission application, confirmed student identity, and begun the process for disbursing local, state, and/or federal financial aid.

While there is a certainly a human interface to admissions and financial aid activities, the fraud prevention strategies largely include technology solutions and automated processes designed to note suspicious patterns and flag for college personnel.

Placed between these two types of fraudulent activities, enrollment fraud detection relies on faculty identification, confirmation, and reporting of student non-participation in the enrolled course or suspicious classroom behavior.

### Enrollment Fraud Mitigation

Faculty play a critical role in enrollment fraud mitigation in that faculty have the responsibility to verify active student engagement within their respective courses. Verification should take place through regular and effective contact between the instructor and students, such as class attendance, class participation, direct engagement with the instructor for asynchronous courses, completion of assignments, or general communication through any medium.

For online distance education courses, title 5 CCR § 55204 requires regular effective contact between the instructor and students, and among students. Again, this can occur in a variety of formats including virtual or in-person activities. Faculty are required to proactively engage with each student enrolled in an online course to both verify and support the student's active engagement in the course. While this engagement is required throughout the duration of the course, faculty should prioritize confirmation of student engagement early in the course and multiple times prior to the census date.

Per title 5 CCR § 58004(c), districts and colleges are required to eliminate inactive enrollments by the Census date. Inactive enrollments have been defined as students that have been 1) identified as a no show, 2) officially withdrawn from the course, or 3) been dropped from the courses due to no longer participating in the course or excessive unexcused absences. College leaders should ensure that they are actively providing updates on the process and timelines for addressing inactive enrollments at the beginning of each term, including posting this information in an easily accessible and high-traffic location. Faculty should be aware of their college processes, procedures, and deadlines for reporting inactive enrollments by Census. Meeting these deadlines significantly reduce the likelihood that financial aid is disbursed fraudulently or that colleges receive state funding fraudulently. Working to meaningfully engage with students well prior to these deadlines is encouraged as it both improves the likelihood of retaining and supporting real students and clears non-students early enough to allow real students to enroll. Faculty should be aware that failing to report inactive enrollments prior to Census carries implications for apportionment or college funding allocations. Deliberately or knowingly failing to report inactive or fraudulent enrollments by the Census deadline is considered engaging in or contributing to a fraudulent activity.

### Student-Centered Approach

As we work to improve our fraud prevention and mitigation strategies, it is important to make explicit that **students are not committing fraud**. Bad actors looking to take advantage of the current health crisis, and obtain financial resources meant for students, are the individuals committing fraud. It is therefore critical that any fraud prevention or mitigation approach aim to prevent harm to real students. With this in mind, we recommend engaging with students in

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authentic, meaningful, and diverse ways. A multi-layered and varied approach to student engagement is an important strategy that facilitates support for real students while establishing multiple data points for identifying inactive or suspicious student participation. A short list of recommended strategies include the following:

- Proactively reach out to students that have not engaged prior to dropping them from the course
- Hold and encourage early attendance in virtual office hours
- Review, at least briefly, any work submitted prior to Census to ensure it matches the subject matter being taught, or relates in other ways to the assignment the student was to complete.
- Be aware of oddities in enrollment, such as multiple students with the same phone number.
- Review student engagement and login frequency data in Canvas for online courses.
- Include real-time or near real-time interaction with students either during or outside of class
- For larger online classes, consider activities that are harder to automate responses to, including those that are separate from the course delivery platform, e.g., incorporating polling questions in Poll Everywhere or iClicker or using options within your local Learning Management System, such as a Canvas quiz.

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