

Prior Year Findings Follow-Up

Sam Houston State University

Finding Reference #	2017-107
Finding Title	Special Tests and Provisions – Enrollment Reporting
Agency Number	753
Agency/University Name	Sam Houston State University

Detailed Finding Text (Exactly as written in Final Report)

Unless an institution expects to submit its next enrollment reporting roster file to the Secretary of the U.S. Department of Education within the next 60 days, it must notify the Secretary within 30 days if it discovers that a Federal Perkins Loan, Federal Family Education Loan (FFEL), Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan has been made to or on behalf of a student who (1) enrolled at that institution but has ceased to be enrolled on at least a half-time basis, (2) has been accepted for enrollment at that institution but failed to enroll on at least a half-time basis for the period for which the loan was intended, or (3) has changed his or her permanent address (Title 34, Code of Federal Regulations (CFR), Sections 674.19(f), 685.309(b), and 682.610(c)). Enrollment reporting roster files must also include Federal Pell Grant-only recipients (Title 34, CFR, Section 690.83(b), and *Dear Colleague Letter*, March 30, 2012 (GEN-12-06)).

Institutions are required to report the campus-level enrollment for the student, including enrollment status and the effective date of that enrollment status (*National Student Loan Data System (NSLDS) Enrollment Reporting Guide*, chapter 1). In the case of a student who completes a term and does not return for the next term, leaving the course of study uncompleted, the final day of the term in which the student was last enrolled should be used as the effective date. For three-quarter-time, half-time, and less-than-half-time status, the institution must use the effective date that the student dropped to those particular statuses (*NSLDS Enrollment Reporting Guide*, Appendix C).

Sam Houston State University (University) uses the services of the National Student Clearinghouse (NSC) to report status changes to the NSLDS. Under this arrangement, the University reports all students enrolled and their status to NSC. Additionally, NSC completes the roster file on the University's behalf and communicates status changes to NSLDS as applicable. Although the University uses the services of NSC, it is still ultimately the University's responsibility to submit timely, accurate, and complete responses to roster files and to maintain proper documentation (*NSLDS Enrollment Reporting Guide*, chapter 3).

For 2 (3 percent) of 60 students tested who had a status change, the University did not report the status change or effective date to NSLDS accurately. Specifically:

- The University did not report one student's graduated status and the effective date of that status to NSLDS. The University asserted that it reported the graduated status to NSC; however, that status was not reported to NSLDS. The University did not detect that error because it did not have an adequate monitoring process to ensure that student status changes were accurately reported to NSLDS.
- The University incorrectly reported the effective date of one student's withdrawn status as the first day of the Spring 2017 term; that occurred because of a coding error in the University's student financial assistance system, Banner. That student completed the Fall 2016 term but did not return for the Spring 2017 term; therefore, the effective date of the withdrawn status should have been the last day of the Fall 2016 term.

In addition, the University did not report one student's withdrawn status in a timely manner because of a coding error in Banner. That student's withdrawal was reported 76 days after the University became aware of it.

Not reporting student status changes accurately and in a timely manner could affect determinations that guarantors, lenders, and servicers of student loans make related to in-school status, deferments, grace periods, repayment schedules, and the federal government's payment of interest subsidies.

Recommendations:

The University should:

- Accurately report status changes and effective dates to NSLDS in a timely manner.
- Establish and implement a monitoring process to ensure that the status changes it reports to NSC are accurately reported to NSLDS.

Views of Responsible Officials:

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Sam Houston State University

Sam Houston State acknowledges and agrees with the findings. Through thorough analysis of the audit findings Sam Houston State is developing and implementing corrective actions to ensure timely and accurate reporting through NCS to the NSLDS.

Corrective Action Plan:

The Registrar's Office will develop a policy and procedures manual for internal processes, which will include detailed steps of the student withdraw process. All necessary staff will be trained on the proper procedures (including appropriate dates to be used). In addition, an internal audit process will be developed to review data changes in an effort to ensure accuracy.

The Registrar's Office is exploring the possibilities of submitting enrollment files to the National Clearing House (NSC) every two weeks throughout the semester beginning after census date to ensure accurate and timely reporting to NSLDS. A process will be developed to ensure reporting is completed by the required dates.

Implementation Date: February 2018

Responsible Person: Teresa Ringo

Information to be completed by University:

2017-107: Enrollment Reporting	
Person Responsible for Implementation	Teresa Ringo, University Registrar, Enrollment Management Division, Registrar's Office.
Email	tringo@shsu.edu
Phone Number	936-294-1034
Date Corrective Action was Implemented	04/01/2018
<p>1. Describe corrective action taken to address finding.</p> <p>The Registrar's Office has created standard operating procedures (SOP's) for the Registration/Front Counter area and placed them on the shared drive where they are accessible to all Registrar employees. We also created process flow charts for further explanation of the processes. Within these SOP's, are outlines of the steps needed to ensure that there are checks and balances of our registration processes so that our accuracy rate is improved. The procedure to ensure accuracy is performed daily in order to find errors in a timely manner.</p> <p>In addition, we have created a new submission calendar with the National Student Clearinghouse, increasing our submission dates to twice per month after the census date. The changes in submission dates begin with Summer 2018 term. This should ensure that all enrollment reporting has sufficient time to reach NSLDS within the required period.</p>	
<p>2. If you have not fully addressed this finding, please describe any planned corrective action.</p>	