September 22, 2023

JIM RAWLINS   VALERIE POLICHAR
Associate Vice Chancellor   Senior Director
Enrollment Management   Information Technology Services
0021   0110

Subject: ***Commencement of Academic***
                   Activity Report 2023-07

The final report for the review of Comme*ncement of Academic Activity, Report 2023-07*, is attached. We would like to thank all University personnel for their cooperation and assistance during the review.

Because we were able to reach agreement regarding management action in response to our recommendations, a formal response is not requested. We will contact you at the appropriate time to evaluate the status of the management action plan.

UC wide policy requires that all draft reports be destroyed after the final report is issued. We also request that draft reports not be photocopied or otherwise redistributed.

                                      Christa Perkins
                                      Director
                                      Audit & Management Advisory Services

Attachment

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UC San Diego

AUDIT & MANAGEMENT ADVISORY SERVICES

Commencement of Academic Activity
Report No. 2023-07
September 2023

FINAL REPORT

Performed By:

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Approved By:

Christa Perkins, Director

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ATTACHMENT A – Faculty Survey Results

I. EXECUTIVE SUMMARY

Audit & Management Advisory Services (AMAS) has completed a review of Commencement of Academic Activity (CAA) as part of the approved audit plan for Fiscal Year 2022-23. The objective of our review was to assess business processes for validating Commencement of Academic Activity (CAA) to achieve compliance with the Title IV program federal aid requirement. A secondary objective was to determine whether information technology controls for Canvas and AATS provide reasonable assurance that system information related to CAA is appropriately secured.

Based on our review, we concluded that business processes and system functionality for validating Commencement of Academic Activity (CAA) for the Title IV program federal aid requirement need improvement to provide assurance of campus compliance with the ED requirements. The necessity and amount of manual work required to merge and complete the multiple data sets that are required from each system increase the risk of errors that could result in non-compliance and/or erroneous rescinding of aid from students who may have actually begun academic activity. Also, hundreds of faculty were not compliant with the UCSD process for certifying CAA over the prior year. Additionally, FAS did not track the total amount of aid that had to be reinstated at the end of each term, so we were unable to confirm whether the current process was effective at capturing all instances of CAA prior to billing.

We concluded that UCSD's information technology controls for Canvas LMS and AATS provide reasonable assurance that system information is appropriately secured. We did not find any instances when access was used inappropriately. However, we noted opportunities to update AATS user roles for those who do not need access, as well as the possibility of adding access for Teaching Assistants, which would relieve some of the administrative burden of certifying that is currently on instructors.   Management Action Plans are summarized briefly below:

> **A. System and Business Process Challenges**
> 1. Information Technology Services (ITS) is in the process of creating a new Dropped/Withdrawn tab in AATS that will capture students who drop or withdraw from a class who were already certified.
> 2. ITS is in the process of adding students who were not certified prior to dropping or withdrawing to the Pending tab in AATS.
> 3. The Registrar, FAS, and ITS will continue discussions to evaluate various strategies to improve the reporting process and identify the requisite staff resources that would be required to implement more streamlined and efficient reports. Strategies may include collaborating on a master calendar of deadlines.
> 4. Until an automated solution can be identified, FAS will pull the API report daily during the financial aid submission period to capture section IDs in case a student's enrollment status changes.
> 5. ITS and Enrollment Management will reevaluate the requirements to qualify as an academic activity, to determine whether additional Canvas activities (such as those not identified with #FinAid or ungraded assignments) can be included.
> 6. ITS and Enrollment Management will consider whether to request augmented resources during the next budget cycle

B. Utilization of CAA Tools

1. Enrollment Management will consider focused communication and escalation to Deans for schools with high rates of non-compliance. Enrollment Management may also consider identifying a point of contact in each school to assist with amplifying the need for compliance with this requirement.
2. FAS and Enrollment Management will include a comment in AATS to identify source of the certification when performing certifications on behalf of the instructor.
3. ITS and FAS will consider feasibility of solutions that would allow TAs to help process certification in AATS for class sections under their purview.

C. Certifications and Billings

1. FAS will consider implementing a process to identify the number of students whose student aid is reinstated at the end of the term.

D. AATS User Access

1. ITS removed access for a former consultant in FAS identified during our review.
2. ITS removed AATS certification access of HS Financial Aid staff who do not require that level of access.
3. ITS will implement a process for departments to periodically review and update user access to ensure that access for certification of CAA is only available to users who need these permissions.

Observations and related management action plans are described in greater detail in section V. of this report.

II. BACKGROUND

Audit & Management Advisory Services (AMAS) has completed a review of Commencement of Academic Activity (CAA) as part of the approved audit plan for Fiscal Year 2022-23. This report summarizes the results of our review.

The U.S. Department of Education (ED) requires institutions receiving federal Title IV aid to document a student's[1] commencement of academic activity (CAA) during each academic term. ED has defined academic activity to include:
- Attending class;
- Submitting an assignment;
- Taking a quiz or an exam;
- Participating on a discussion board; or
- Talking with the instructor about the class or subject matter.

Additionally, if the CAA has not been verified, the student's financial aid package should be rescinded "as soon as possible, but no later than 30 days after the date that the institution becomes aware that the student will not or has not begun attendance," leading to a partial or complete loss of funds. The CAA requirement is met by student attendance in any class for most Title IV aid; however, Pell Grant Program (Pell) funds are treated differently, requiring recalculation of aid based on enrollment status to reflect only those classes for which the student actually began as of the financial aid freeze date[2].

UCSD administers more than $100 million in federal Title IV funds each year. UCSD is currently in the 2022-23 award year, and therefore final figures on federal Title IV Aid will not be available until September 2023. Financial Aid & Scholarships Office (FAS) provided the following figures in *Table 1* for the most recent two award years with full data:

Table 1: UCSD Title IV Participation

UCSD Title IV Participation	2020-21 Award Year	2021-22 Award Year
Federal Direct Loan Program	$ 83,270,110	$ 94,954,710
Federal Pell Grant Program	$ 58,534,644	$ 58,849,965
Federal Supplemental Educational Opportunity Grant Program	$ 2,933,749	$ 3,077,851
Federal Work Study Program	$ 1,501,473	$ 1,329,721
Total	**$ 146,239,976**	**$ 158,212,247**

Source: Financial Aid & Scholarship Office

Prior to Summer of 2022, UCSD did not have a process to certify CAA. In February 2021, the University of California Office of the President (UCOP) Office of Graduate, Undergraduate, and Equity Affairs released a report instructing campuses to document CAA early in the term to comply with federal regulations.

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[1] This includes undergraduates, graduates, and professional school students. Extension students do not receive Title IV funds and are therefore excluded.

[2] The freeze date is the date at which a student's enrollment status is locked in for financial aid purposes for the term.

Several UCSD campus departments collaborated to develop a system and process for tracking CAA to ensure UCSD complies with Federal Financial Aid regulations.

In Summer of 2022, UCSD implemented a process to verify student CAA in each class, every term (including Summer sessions), and instructors were notified that they would be required to certify whether students have commenced academic activity to satisfy the requirement set forth by the ED. The campus provides two options for verifying a student's CAA. The first is an electronic form created by Information Technology Services (ITS), called the Academic Activity Tracking System (AATS). This option allows instructors to directly certify students' CAA. Instructors can log into AATS with their Active Directory (AD) credentials and certify students in batches by class section. The AATS form defaults to a certification of "yes" for each student in a class section, and the instructor can select "no" for individual students who did not commence academic activity prior to certifying the class in one large batch. Instructors are also allowed to change certification status for individual students.

The second option is Canvas Learning Management System (Canvas), a software application that connects instructors and students to share course materials and activities online. Through Canvas, students can access assignments, discussions, quizzes, and grades, submit papers, and more. UCSD began transitioning to Canvas in the Winter 2020 term to shift to remote instruction during the Covid-19 pandemic when the usage of Canvas increased substantially, eventually replacing its prior learning management system (TritonEd) after Spring 2020. All instructors can conduct their courses through Canvas and access the system using their AD credentials. In Summer of 2022, the use of Canvas was expanded as one way for instructors to comply with documenting a student's CAA by assigning an activity for students to complete. Students complete eligible assessments or activities that automatically certify their CAA based on a hashtag (#FinAid), which the instructor must include in the title of the activity.

At the completion of the second week of classes (first week in Summer sessions), FAS administrators obtain certification data from both AATS and Canvas and then initiate the follow up process: first with faculty who have not assigned a #FinAid assignment to their students or certified CAA via AATS, and second to students in order to obtain additional certifications prior to the final billing deadline. If FAS does not obtain the required certifications based on the type of financial aid the student receives, FAS rescinds the financial aid amount and bills back the student the requisite amount.

The UCSD Health Sciences (HS) Financial Aid Office manages certification of CAA for the School of Medicine (SOM) and Skaggs School of Pharmacy and Pharmaceutical Sciences (SSPPS). These professional schools have different term start dates and a smaller population of students, most of whom do not receive Title IV federal aid.

III. AUDIT OBJECTIVE, SCOPE, AND PROCEDURES

The objective of our review was to assess business processes for validating Commencement of Academic Activity (CAA) to achieve compliance with the Title IV program federal aid requirement. A secondary objective was to determine whether information technology controls for Canvas and AATS provide reasonable assurance that system information related to CAA is appropriately secured.
The scope of our review did not include certification of CAA for SOM or SSPPS faculty, who are managed separately through the UCSD HS Financial Aid Office.

In order to achieve our objective, we performed the following:

- Reviewed:
  - Title 34 Code of Federal Regulations;
  - UCSD Policy & Procedure Manual (PPM) 135 – Computing Resources
  - December 2020 ED audit of UC Merced;
  - February 2021 UCOP report on CAA;
  - UCSD CAA implementing documents;
  - Campus announcement of the ED requirements;
  - Blink guidance on CAA;
  - UCSD CAA – High-Level Business Requirement Document including process diagrams and implementation timeline;
  - ITS-provided Summary of UCSD's Canvas Learning Management System, including an overview, administration, and use;
  - March 2022 CAA presentation to the Academic Senate;
  - ITS findings and CAA recommendations;
  - Financial Aid & Scholarship CAA pain points;
  - CAA compliance reports; and
  - Canvas Service Organization Control II (SOC 2) Report on System and Organization Controls Relevant to Security, Availability, Processing Integrity, Confidentiality, and Privacy.
- Conducted interviews with the following:
  - Senior Director – Education Technology Services, ITS;
  - Senior Director – Student Information Services, ITS
  - Assistant Director – Administrative Technology Services, ITS;
  - Education Technical Specialist, ITS;
  - Business System Analyst, ITS;
  - Applications Programmers, ITS;
  - Senior Associate Director, FAS;
  - Associate Director – Business Systems / Digital Strategy, FAS;
  - Programmer Analyst, FAS; and
  - Director, Health Sciences (HS) Financial Aid Office.
- Observed system walk-throughs and demos of the Canvas and AATS;
- Performed analysis of Canvas and AATS in the following areas:
  - System utilization by faculty;
  - System and business processes;
  - CAA certifications and billings; and
  - Security and administration controls.
- Performed testing of a sample of 25 students who were eligible for Title IV financial aid to determine whether they had commenced academic activity, were billed if they had not, and had aid reinstated if additional CAA information was obtained at the end of the term.

IV. CONCLUSION

Based on our review, we concluded that business processes and system functionality for validating Commencement of Academic Activity (CAA) for the Title IV program federal aid requirement need improvement to provide assurance of campus compliance with the ED requirements. ITS and FAS continue to collaborate on system enhancement requests; however, the necessity and amount of manual work required to merge and complete the multiple data sets that are required from each system increase the risk of errors that could result in non-compliance and/or erroneous rescinding of aid from students who may have actually begun academic activity.

The most significant areas for improvement are in system and business processes and system utilization by faculty. Canvas and AATS captured active enrollment status for students, which resulted in some certifications being dropped based on the timing of the data pull, for example, if the student dropped the class after completing an academic activity. Additionally, Canvas did not retain certifications when an instructor later removed or took the assignment offline. ITS is currently developing additional functionality in AATS to capture students who drop or withdraw from a class. ITS has also developed additional Canvas reports to help identify missing sections and student certifications; however, the additional reports require additional time and effort from both ITS and FAS to compile and prepare the data. ITS and FAS continue to work together to identify new processes and solutions.

Faculty utilization of Canvas and AATS can be improved to reduce administrative efforts by FAS to certify students and ensure accurate student billing in a timely manner. Hundreds of faculty were not compliant with the UCSD process for certifying CAA over the prior year. A number of factors contributed to this, including lack of awareness and/or understanding of the importance of the requirement, Canvas assessments set up without the proper requirements to capture CAA, or administrative burden in time it takes to complete.

We confirmed 22 of 25 students in our sample commenced academic activity in at least one course. For those whom we were unable to confirm CAA, they did not receive any financial aid due to not meeting eligibility requirements. We did not identify any students in our sample who were erroneously billed. We identified one student whose aid was reinstated based on additional follow-up with their instructor; however, FAS did not track the total amount of aid that had to be reinstated at the end of each term, so we were unable to confirm whether the current process was effective at capturing all instances of CAA prior to billing.

We concluded that UCSD's information technology controls for Canvas LMS and AATS provide reasonable assurance that system information is appropriately secured. However, we noted opportunities to update AATS user roles for those who do not need access, as well as the possibility of adding access for Teaching Assistants, which would relieve some of the administrative burden of certifying that is currently on instructors. We did not find any instances when access was used inappropriately.

These observations and management action plans are discussed further in greater detail in section V of the report.

V. OBSERVATIONS REQUIRING MANAGEMENT ACTION

A.	System and Business Process Challenges
Canvas and AATS did not retain certain certifications, based on student enrollment at the time the data was pulled, and Canvas did not retain certifications when an instructor removed or took the assignment offline.	
Risk Statement/Effect	
Incomplete certification data can result in additional administrative efforts to complete certification processes and could unnecessarily place a student's financial aid at risk.	
Management Action Plans	
A.1	ITS is in the process of creating a new Dropped/Withdrawn tab in AATS that will capture students who drop or withdraw from a class who were already certified.
A.2	ITS is in the process of adding students who were not certified prior to dropping or withdrawing to the Pending tab in AATS.
A.3	The Registrar, FAS, and ITS will continue discussions to evaluate various strategies to improve the reporting process and identify the requisite staff resources that would be required to implement more streamlined and efficient reports. Strategies may include collaborating on a master calendar of deadlines.
A.4	Until an automated solution can be identified, FAS will pull the API report daily during the financial aid submission period to capture section IDs in case a student's enrollment status changes.
A.5	ITS and Enrollment Management will reevaluate the requirements to qualify as an academic activity, to determine whether additional Canvas activities (such as those not identified with #FinAid or ungraded assignments) can be included.
A.6	ITS and Enrollment Management will consider whether to request augmented resources during the next budget cycle.

A. System and Business Process Challenges – Detailed Discussion

In their current states, both Canvas and AATS did not retain certain historical data on certifications on student enrollment status in a course at the time the data is pulled. Additionally, the ability of instructors to remove CAA assignments from their Canvas courses also resulted in the data being removed from future reports. Therefore, we could not assure the completeness of the data inputs from Canvas and AATS compared to the data FAS pulled to use for certification.

Canvas

Prior to the Spring 2023 term, Canvas CAA data was routed through the Student Activity Hub (SAH); however, that process resulted in a multi-day delay in access to the data, which was problematic for FAS

considering the tight window to confirm CAA and bill back students as necessary. For Spring 2023, ITS created an Application Programming Interface (API) for Canvas, which is manually updated daily and provided to FAS as needed, eliminating the two-to-seven-day data delay that occurred in prior terms when data was routed through the SAH. At the time of our walkthrough, ITS stated the plan was to eventually build an API that would enable Canvas data to be automatically loaded to the SAH in a more expedited manner.

The Canvas system allows instructors to use either a pre-populated survey for CAA reporting or to create their own assessment. Once an instructor downloads the assessment into their course and publishes it, students may log on to complete the activity.

However, the current state processes and system functionality may impact the accuracy and completeness of data used downstream by FAS to report CAA data certification. For the certification to be included in CAA data, the Canvas assignment must meet precise requirements, including, but not limited to:

- Having #FinAid in the name/title of the assessment,
- The assignment or survey must be graded;
- The assignment is set to "online" submission only; and
- Students are aware of and complete the assignment by the end of the second week of the term (first week in Summer sessions).

Also, a student's certification for a specific section is not retained after the student withdraws and/or transfers to another section after the freeze date (end of week two during the academic year and end of week one during Summer sessions). If a student was in one class and then switched to another section of the same class, Canvas pulls in the currently enrolled and formerly enrolled section IDs for the #FinAid certification, but does not identify in which section the student obtained the certification (so there is no way to confirm what class they had activity in for the purposes of identifying certification for Pell recipients). Furthermore, if instructors adapt the assessment settings (i.e., change it to ungraded or remove the #FinAid from the title), eventually delete, or take their #FinAid assessment offline, they will not appear in later reports.

According to ITS and FAS, the specific requirements of having to include #FinAid in the title and ensuring the assignment is graded have been the most significant factors that have resulted in many students completing assignments meant for CAA that were not counted. While all these requirements are necessary for the CAA process in the current state, they also introduce multiple points of potential error. In addition to Canvas's technical limitations described above, the process depends on both the instructor and students completing all the requirements correctly within a narrow window for CAA and for the support staff to pull and reconcile reports frequently. As a result of these factors, we could not assure the completeness of the data from Canvas to FAS. For Spring 2023, ITS provided a "one-off" report to FAS that included all Canvas student activity that would meet the ED requirement of academic activity; however, ITS stated this could not be part of the practice moving forward due to the amount of data required to download and ITS' limited available resources to provide this ongoing support.

While the newly implemented API report eliminated the data delay, the API report does not solve the issue of students who have dropped or withdrawn and are still not included in reports pulled after their dropped/withdrawn date. For the Spring 2023 term, ITS also provided two additional reports: one that shows activity for withdrawn students and one for students who received all non-passing grades. After obtaining the ITS reports, FAS must further manipulate and join large data sets from three separate

reports. The labor-intensive process due to lack of system functionality in tracking and retaining historical data has resulted in increased administrative time (for both ITS and FAS) and delays in reviewing and processing accurate certifications.

FAS has requested from ITS the following enhancements or creations for Canvas reporting over the prior four terms (Summer 2022, Fall 2022, Winter 2023, and Spring 2023), most of which have been addressed while others are still in progress, pending resources, or cannot be addressed based on current system functionality:

Table 2: FAS Requests for Canvas Reporting

FAS Requests:	Status (Addressed?)
More frequent reports	Yes
Access to SAH (Student Activity Hub) report	Yes
Access to API reporting script	Yes
Address missing section IDs for students who dropped the course	In Progress pending resolution. Workaround to pull daily reports during submission period.
Resolve missing section IDs for students in cross-listed courses	Yes
Fill in missing section ID data with data from Canvas Provisioning – Enrollments Report	Yes
Improve 2.5-day latency in data	Yes
Fix broken data connection that led to 10-day delay in reporting	Yes
Move from Canvas Batch Data to Canvas Live data	Investigated, would not meet requirements.
Move from Canvas Batch Data to Canvas API data	Yes
Create a Walkaway report for inactive students	Yes
Gain read-only admin access in Canvas LMS	Yes

Source: ITS

Canvas and AATS requests and completed enhancements are tracked and discussed at regularly scheduled campus partner meetings between ITS and Enrollment. The most recent meeting was in early June 2023, where partners discussed analyzing solutions to the outstanding Canvas issues and the resources required to achieve them, including hiring additional ITS personnel support.

Academic Activity Tracking System (AATS)

AATS populates class data from the Student Information System (SIS) via a Scheduled Classes API. This API updates student enrollment within 24 hours of adding or dropping a class. AATS data populates into an SQL table which FAS imports into Access to merge and aggregate the data. The AATS form defaults to certification of "yes" for each student in a class, and the instructor can select "no" for individual students who did not commence academic activity prior to certifying the class in one batch. Instructors are also allowed to change certification status for individual students.

We noted that AATS has process and system functionality deficiencies that may impact the accuracy and completeness of data. For instance, if a student drops or withdraws from a course in which they had already been certified in AATS, there is no history of the certified course as the system only recognizes

currently enrolled students. Additionally, if a student drops or withdraws from a course before the instructor was able to certify their status, the student would be removed from the class. During our review, ITS was in the process of two AATS enhancements:

1. Adding a Dropped/Withdrawn tab in AATS that will include withdrawn and dropped students, which will also help with missing sections.
2. Adding students who dropped or withdrew from a class prior to certification to the current Pending tab.

The amount of administrative effort required for FAS to obtain, merge, and rely on multiple reports has made the process cumbersome and inefficient. Without a student's full certification history, there is an increased risk that FAS cannot verify the correct number of units to ensure students meet CAA requirements and for accurate reporting in relation to federal funds. FAS needs access to all courses that were certified, even if the student drops the certified course.

B.	Utilization of CAA Tools
Faculty utilization can be improved to increase CAA certifications and reduce administrative efforts by FAS to certify students.	
Risk Statement/Effect	
Any area of non-compliance could result in putting already vulnerable students at risk financially, in addition to ED fines.	
Management Action Plans	
B.1	Enrollment Management will consider focused communication and escalation to Deans for schools with high rates of non-compliance. Enrollment Management may also consider identifying a point of contact in each school to assist with amplifying the need for compliance with this requirement.
B.2	FAS and Enrollment Management will include a comment in AATS to identify source of the certification when performing certifications on behalf of the instructor.
B.3	ITS and FAS will consider feasibility of solutions that would allow TAs to help process certification in AATS for class sections under their purview.

B. Utilization of CAA Tools – Detailed Discussion

In June 2022, the Executive Vice Chancellor (EVC) for Academic Affairs and the Associate Vice Chancellor (AVC) for Enrollment Management jointly sent a campus notice to all academics and staff at UCSD, notifying them of the ED requirement to document CAA. The notice included an explanation of the requirement, including the statement that instructors will be the ones who are required to certify the CAA requirement, the new campus process, instructions and links to both AATS and Canvas, and a link to Frequently Asked Questions (FAQ). In addition to the above notice, FAS sends email notices to instructors

and students each term on the first day of school, reminding them of the requirement and providing instructions.

When the deadline has passed in each term (the end of week two for Fall, Winter, and Spring and by the end of week one for Summer terms), FAS collects and reviews data from each system (Canvas and AATS) multiple times. For faculty who have not utilized either system to certify students, FAS sends out an "Action Required" email to remind them to certify. FAS then sends emails to remaining students notifying them of the classes for which there is no documentation of CAA.

Faculty Compliance

We reviewed compliance rates for faculty for each term. *Table 3* below shows the number of faculty who did not comply with the CAA process each term:

Table 3: Faculty Compliance by Term

Term	Total Faculty Teaching	Faculty Not Compliant with CAA Certification	Percent Not Compliant
Summer (Sections I, II, and III), 2022	709	61	9%
Fall 2022	1867	113	6%
Winter 2023	1931	204	11%
Spring 2023	1903	154	8%

Source: FAS

According to FAS, the figure decreased in Spring 2023 due to a combination of increased outreach efforts by FAS to individual instructors with large classes and the API report of Canvas data that was implemented in Spring 2023.

Table 4 shows the top five schools with the highest percentage of faculty non-compliance:

Table 4: Top Five Schools With Non-Compliance

School	Number of Non-Compliant Faculty	Percentage of Total
Jacobs School of Engineering	83	21%
School of Social Sciences	61	16%
School of Arts and Humanities	51	13%
School of Biological Sciences	50	13%
School of Physical Sciences	51	13%
Total	**296**[3]	**75%**

Source: FAS

In order to better understand faculty knowledge and perspective on CAA certification, we sent a Qualtrics online survey to a list of faculty who had not performed certifications in one or more of the following

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[3] Out of 393 total faculty who did not comply with the requirement.

terms: Summer 2022, Fall 2022, Winter 2023, and Spring 2023. The survey was initially sent to 738 faculty, including 356[4] HS faculty[5].

A summary of survey results is provided in **Attachment A**, including relevant survey responses. Faculty who opted to provide additional feedback on the CAA process provided additional detail on one of the options they previously selected regarding the reason for non-compliance:

- Administrative burden in completing;
- They believed that they had completed the requirement and weren't aware of an issue;
- Lack of communication or awareness of requirement; and
- System issues.

As described above, the Canvas system has specific requirements that must be met for the assignment to be included in CAA certification data, which has resulted in instructors being unaware that their assessments were not compliant as they are not notified when they have made a change to the assessment that disqualifies it for CAA certification.

Teaching Assistants (TA) do not have access to certify students in AATS due to their class code. If TAs were provided access to certify students in their class sections, it might provide more timely certifications and less administrative burden for faculty.

Certifications by FAS and Enrollment Management Staff

In some instances, faculty have been unable to access or navigate the AATS system to certify students. As a result, certain FAS and Enrollment Management staff have been given access to certify in AATS on behalf of the faculty member in these and other instances (i.e., certification supported by Canvas activity that has not been specifically marked as #FinAid).

We reviewed the rates of certifications performed by non-faculty certifiers, and we found it was less than 1% of all certifications each term, with a significant decrease from Winter 2023 (847 certifications) to Spring 2023 (105 certifications).

We selected a sample of ten certifications made by FAS staff in Spring 2023 to review supporting documentation. FAS retained documentation for all ten certifications, including instructor emails or Canvas reporting data that included any course activity (not just assignments titled with #FinAid). Five of the sampled certifications did not include a comment in AATS identifying the reason for the non-faculty certification. A review of the comment section for all terms showed between zero and 78%, with an average of 19%, had a comment listed. Spring 2023 had the highest rate of comments at 78%. Including a comment to denote the reason for the non-faculty certification may help identify recurring issues such as instructor access, system issue, or student certification via non #FinAid Canvas assignments. Also, a comment would provide better support to document the reason for an administrator certifying on behalf of a faculty member, which would be important in the event of an external review.

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[4] Some of these faculty had dual Academic Affairs and Health Sciences appointments.

[5] The HS Financial Aid Office manages CAA for faculty in SOM and SSPPS. We discovered these faculty were erroneously included in the survey request shortly after releasing the survey; however, some responses had already been recorded, and due to the anonymous nature of the survey we could not identify all of the invalid responses to remove them.

ITS Tickets

The Senior Director for Education Technology Services provided data on ITS tickets related to Canvas and AATS. Based on the reports, support requests have decreased by half from Winter 2023 (64) to Spring 2023 (32).

ITS tickets included the following topics from instructors and students:
- 50% - Instructor confusion over which courses to certify (i.e., in Spring 2023, FAS began displaying courses the instructor had not certified, the ticket count in this category is trending downwards now);
- 15% - Course not showing submissions – Canvas quiz/survey setup problems/questions;
- 25% - Instructors requesting confirmation they had completed their CAA obligations;
- 5% - Instructor confusion over Canvas #FinAid instructions or Canvas Commons; instructions; and
- 5% - Questions about Canvas.

No tickets were routed to ITS regarding student confusion over Canvas CAA related submissions.

C.	Certifications and Billings
FAS did not track the amount of aid that had to be reinstated at the end of each term.	
Risk Statement/Effect	
Without the ability to compare student aid billings to student aid reinstatement, it is unclear whether the process is effective or working as intended.	
Management Action Plan	
C.1	FAS will consider implementing a process to identify the number of students whose student aid is reinstated at the end of the term.

C. Certifications and Billings – Detailed Discussion

ED requires that financial aid be rescinded for any students whose CAA cannot be documented. If a student does not commence academic activity or is not certified in enough units to support their enrollment status[6], FAS bills the student for the difference in Title IV financial aid amounts until the enrollment amount can be supported. FAS provided billing data for each term in *Table 5*:

Table 5: Students Billed for Lack of CAA Certification

Term	Students Billed for Lack of CAA Certification
Summer 2022	97
Fall 2022	220
Winter 2023	217
Spring 2023	221

Source: Financial Aid & Scholarship Office

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[6] For Pell recipients.

FAS provided data sets of students who:
- Were eligible for Title IV aid,
- Received all non-passing grades, and
- Withdrew from all courses.

We selected random samples of 10% (16) of (161 total) students who were eligible for federal financial aid and received all non-passing grades and 10% (9) of (90 total) students who were eligible for federal financial aid and withdrew from all courses in Winter 2023 to review certification and billing status. For each student (25), we reviewed CAA records from AATS and Canvas to identify whether the student had been certified for CAA in any course during the term. For students in the sample who received Pell funds, we obtained additional information from FAS regarding their enrollment status at the freeze date, the number of units that FAS validated as of that date, and the amount, if any, the student should have been billed for. We did not find any issues with the certifications or billings.

At the end of each term, FAS reviews grades for billed students to identify if aid can be reinstated for any courses the student did not previously have documented CAA. In addition to the grade check FAS performs at the end of each term, a student may initiate a request to review additional information to support certification of additional classes and reinstatement of aid. These are both manual processes that have not been tracked; therefore, we were unable to review the total amount of aid that was reinstated due to CAA documentation after billing.

We noted one student in our sample who had aid reinstated based on additional information received from the student's instructor confirming CAA. As noted above, our testing did not identify any issues with the documentation of certification or billings; however, we were unable to confirm the total amount of aid that had to be reinstated to students via either the grade check or student inquiry.

While FAS did not track the amount of aid that has been reinstated since the CAA certification process was implemented in Summer of 2022, in Winter of 2023, FAS began documenting the review of grades that they perform at the end of each term.

| D.	AATS User Access
User access for AATS can be updated to remove certain users who do not require the authority to certify student CAA.	
Risk Statement/Effect	
Users with unnecessary access to student information and certification could result in unauthorized disclosure or activity.	
Management Action Plans	
D.1	ITS removed access for a former consultant in FAS identified during our review.
D.2	ITS removed AATS certification access of HS Financial Aid staff who do not require that level of access.

| D.3 | ITS will implement a process for departments to periodically review and update user access to ensure that access for certification of CAA is only available to users who need these permissions. |

D. AATS User Access – Detailed Discussion

University Policy (PPM 135 – Computing Services) requires users only have access to IT resources "that they have been explicitly authorized to access and only for the purposes for which access authorization has been granted." AATS access is granted to instructors based on their role; however, as noted above, additional access is granted to certain individuals in Enrollment Management and FAS who can certify on behalf of instructors.

We reviewed access for non-faculty users with access to certify student CAA. We noted that a former contractor who left FAS in June 2022 still had certification access as of June 2, 2023. We notified ITS, and the user's access was immediately removed. Users with unnecessary access to student information and certification could result in unauthorized disclosure or activity.

The remaining AATS non-faculty users were all active UCSD employees. We discussed user roles and access with the Registrar, FAS, and UCSD HS Financial Aid. The Registrar and FAS confirmed current user access was appropriate. The Director of HS Financial Aid noted it would be appropriate to remove AATS certification access for three department employees. We did not note any unauthorized activity for these three employees.

ATTACHMENT A – Faculty Survey Results

1. We sent surveys to faculty in the following School / Institute / Center / Program:

- Analytical Writing Program
- Center for Energy Research
- Eighth College
- Global Health Program
- Halıcıoğlu Data Science Institute
- Institute for Neural Computation
- Jacobs School of Engineering
- Muir College
- Qualcomm Institute
- Rady School of Management

- San Diego Supercomputer
- School of Arts and Humanities
- School of Biological Sciences
- School of Global Policy & Strategy
- School of Medicine (SOM)[1]
- School of Physical Sciences
- School of Public Health
- School of Social Sciences
- Scripps Institution of Oceanography
- Skaggs School of Pharmacy and Pharmaceutical Sciences (SSPPS)[2]

2. Are you familiar with the US Department of Education (ED) regulation requiring institutions that receive federal aid to report commencement of student activity?

Familiarity with ED Regulation

	Yes	No
	60 (51%)	53 (45%)
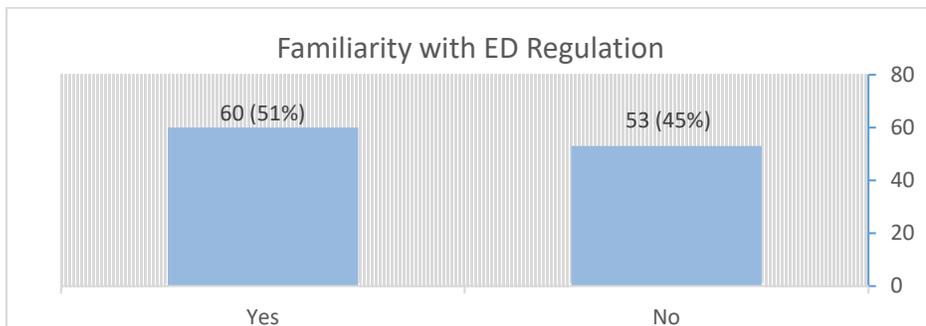
3. Do you recall receiving messages on the need for faculty to complete certification of student (CAA) for each class and each term, and/or announcement of new tools to do so.

Faculty Certification and Announcement

	Yes	No
	61 (52%)	52 (44%)
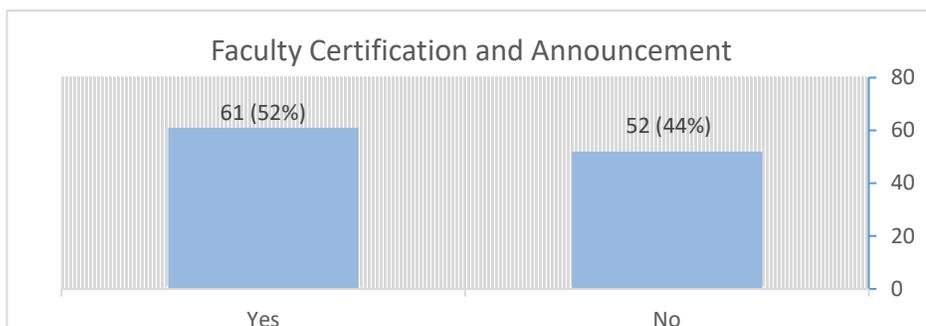
[1] Certification of CAA for students in the SOM was managed separately from campus. These faculty were later notified that they may not be subject to the CAA process if their students were all enrolled in the SOM.
[2] Certification of CAA for students in the SSPPS was managed separately from campus. These faculty were later notified that they may not be subject to the CAA process if their students were all enrolled in the SSPPS.

ATTACHMENT A – Faculty Survey Results

4. What factors have prevented you from completing certification of student CAA in one or more prior period? (select all that apply)

Prevention Factors

Factor	Count
Other, please specify	49
Was not previously aware of the CAA requirement	45
I submitted a Canvas assignment with #FinAid and was not aware there were issues	23
The importance of certification or impact if not complete was not clear	22
Canvas LMS login issue	16
Takes too much time to complete the certificate	7
AATS login issue	7
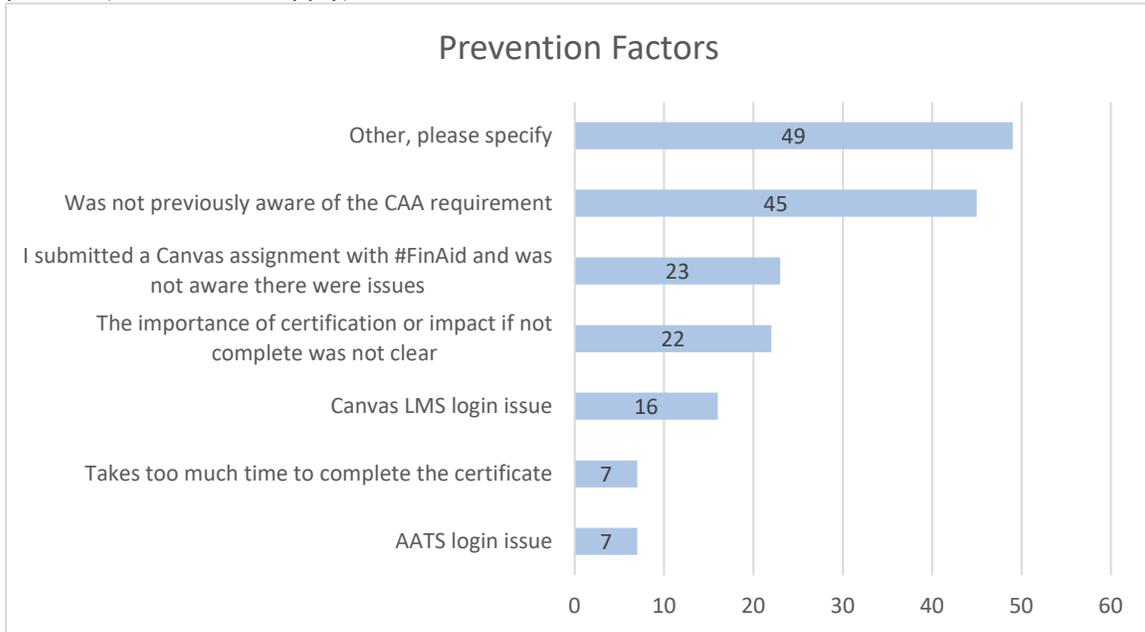
5. The table below represents some of the "Other, please specify" responses[3] noted in #4 above as well as any additional comments made at the end of the survey:

#	Area	Instructor Comments
1	Administrative Burden	• All of the above. This takes way too much time, should be done by administrative staff rather than faculty who are also directly engaged in doing the actual work of teaching, research, and raising the funds that run the University. • As department chair, I am assigned as instructor of classes that meet irregularly (for all grad students) and it is not possible to comply accurately. • I don't use Canvas. We have too many idiosyncratic systems. This seems like a $100M solution to a $1M problem by DOE in terms of time spent to abuse prevented. • I just forgot. It is one of a thousand systems I'm now supposed to interact with between Canvas, UC Path, podcasting, and everything else to get the quarter started. I know it is important. I take students experiences with our carceral border regime seriously. But there's so much to do. This is labor. It is also absurd labor in a class of 250 people where I do not take attendance -- I rely on students to turn in the work. The certification is meaningless as I just have to page through and click click click. • Impossible to keep track of all UCSD emails and paperwork. It's out of control.

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[3] Some responses have been edited for spelling or grammar.

ATTACHMENT A – Faculty Survey Results

#	Area	Instructor Comments
		• So busy & overwhelmed that things fell through the cracks, sorry. I think I fixed it in time. • There are too much similar requests and I am often lost of the track of many of them. Can our staff members help with these? Please help! • More administrative support for the faculty would be welcome. • This needs to be made way easier. We assign grades and fill out academic paperwork all the time via UCSD business systems. Someone needs to solve this with a simply check-box within UCSD business systems just like is done for grades. • Just another among zillions of meaningless administrative obligations that make life even more difficulty for faculty and distract from scholarly and educational pursuits. • This task should not be taking faculty time. If it is required then admin staff should be helping beyond sending out emails saying essential 'such and such needs to be done' instead of actually taking care of the tasks. • This requirement is another onerous compliance burden on faculty that distracts from more important aspects of their job. There has to be a better way. • The current set up is extremely stressful, as student enrollment is still in dramatic flux during dates surrounding the deadline. I have to certify multiple times across many sections (large classes can have six sections or more) and repeatedly check to see if enrollment has changed as new students are added when they successfully enroll off the waitlist (this can take some time). Inevitably, some student fall through the cracks. • We get so many emails it is hard to keep up.
2	Believe Completed Requirement	• I am quite sure that I did it for my undergraduate class in F22. It is possible that I thought I overlooked doing it for my graduate seminar class in W23 (but none of them receive financial aid, so perhaps I subconsciously placed that task into a lower priority.) • I believe I did this, and didn't receive notice that I did not certify. • I did certify activity, no idea what this about. • I did certify in Spring when I had a class of 40 students. Didn't know it applied to single intern or 199 students. • I have no pending certifications. My student is certified. • I think I submitted CAA certification. • I thought I had completed the certification. • I thought I submitted for all my courses. • In Winter'23, I certified manually. In Spring'23, I set up a Canvas quiz with #FinAid. Including me in this survey must have been a mistake. I didn't teach in Summer or Fall'22. • Not clear what students require certification. I believe I have submitted certification for each student that I was notified about. If

ATTACHMENT A – Faculty Survey Results

#	Area	Instructor Comments
		something is important, there should be a reminder, not just a single notice.
		• Poorly implemented protocols for certification, for example, graduate students with a TA or Research position need to be certified?? 298/299 courses?? I did certify when I was teaching undergrads and still got a notification, later acknowledged as a mistake
		• Student add/drop complicates this tremendously. I certified manually for one course. This shouldn't be on the individual faculty and should be fully automated in the registrar's office.
		• This is highly frustrating - I tried to quickly respond to any request for these kinds of things and believe I did this?
		• This process is a mess. I certified all my students as directed. If you did not receive them, the problem is in your system.
		• I submitted the #FinAid quiz via Canvas for all quarters from 2022-2023. You can check if you wish. There must be something wrong with the system.
		• I thought that I had submitted the required CAA.
		• Not sure what happened as I follow the instructions I was provided with, at least to the best of my understanding.
3	Lack of Clear Communication / Awareness	• Communication on this issue was quite poor, and the email read more like a phishing attempt than an important university function.
		• Deadlines were not clear.
		• Do not recall receiving specific email about certification. If they were sent, email headings should be more clear. cc'ing department admin would be helpful too.
		• I believe I tried to complete, but it wasn't clear how to actually do it.
		• I did not teach undergraduate courses fall or winter quarters. As for spring, it was never explained what I had to do to certify or why it was crucial. I asked my departmental staff and didn't get sufficient help.
		• I don't recall getting notice on this.
		• A reminder email with a link to the certification page would help me. Thanks.
		• I was disappointed to learn about this from students. The campus communication to faculty was terrible. Given the importance this should have been better communicated.
		• I had no idea about the extensive impact this would have on students. This was new to me this year.
		• I have received NO training whatsoever from UCSD regarding what I need to complete. I receive hundreds of emails each day. If this is important, it needs to be more effectively communicated.
4	System Issue	• I was not able to login. One of them required a business login that I did not have. If there is a way to have a single sign on with AD password login and one click to access, it would be more user friendly.

ATTACHMENT A – Faculty Survey Results

#	Area	Instructor Comments
		- The system clocked and clocked and took forever the first week of the quarter. - Very frustrating to try to navigate the system, when for inexplicable reasons it tells me my password did not work and would not allow me to log in. - I did everything that was asked of me. I set up the quiz by following the link and setting it up on Canvas and asking students to fill it out. Despite all of this, students told me they were not recorded so I had to do it manually. They need to fix this system. - I made a change to the Canvas assignment that resulted in the results not being able to be pulled, which I was unaware of till students emailed me that they weren't certified.
5	Misplaced Communication	- Email blizzard. - Having two different emails for UCSD (business systems vs otherwise) makes this obtuse and easy to miss since I almost never check my business systems email. - Missed the email. - The campus initiated a migration of my email and Teams to the UCSD Health side and it disrupted my email and many messages were not received. - I use the Outlook web-based client for email management. I received notification about this survey in my "Focused" Inbox. When I searched for prior messages, it looks like these notifications were sent to my "Other" inbox, which filters messages, including spam. I don't consistently check the "Other" Inbox and had not seen these notifications. Also, none of my students in my research independent study courses (which are the courses I teach/direct) informed me of this requirement either. I think having the notifications come to our "Focused" inbox and also informing students to remind their advisors would be helpful.
6	Student Awareness	- Students, even told 3 or 4 times will fail to do the Canvas assignments. - I was very careful in filling out these certifications. However, if my memory is correct, I missed a student who added the class at the very end of Week 2 within an hour of the deadline. The student did not participate any academic activities during the very brief time he was enrolled. I think it is unavoidable that students who do not enroll in a timely manner may slip through the cracks.
7	Forgot	During Winter I forgot about the process and I don't think I completed it. I did complete it for spring and will in the future.