



## Internal Review Report

**Review area:** Enrollment Reporting & Leadership Review  
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August 2, 2011

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Chancellor Goetz:

Attached you will find the report for the review of the DSU Enrollment practices and overall Leadership at the institution. The work and findings are limited to the specific areas mentioned above and are summarized on the following pages.

Please let me know if you have any questions or if I can assist in any way with the information found in this report or any other materials.

Very truly yours,

Bill Eggert  
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## Executive summary

The objective of the Dickinson State University (DSU) Enrollment processing & reporting review is to provide the North Dakota University System (NDUS) additional assurance that all SBHE policies are being adhered to. In addition, per the Higher Learning Commission's (HLC) accreditation criteria to assure that "The board exercises its responsibility to the public to ensure that the organization operates legally, responsibly, and with fiscal honesty."

This report is a result of interviews conducted on site and via the telephone, data gathering and validation. Internal review actions to date include:

- Interviewed DSU staff and Directors in the Office of Extended Learning, Office of Enrollment and the Admissions Office to get a thorough understanding of how the conference and training enrollment and admission processes operates, differences between registering and completing actual university classes versus optional conferences, requirements for each, dual-credit students requirements, admissions and the enrollment reporting process.
- Interviewed DSU staff and Directors regarding the overall leadership and culture on campus.

### Enrollment Processing and Reporting review:

The Vice Chancellor for Academic and Student Affairs was notified by the National Survey of Student Engagement (NSSE) that the survey administration process had been suspended at DSU because several survey recipients had contacted NSSE to indicate that they were not DSU students. The list of students for fall 2010 provided by DSU to NSSE, included people who attended local conferences and training symposiums.

Upon further review, DSU had enrolled the conference attendees as non-degree students (admit type: non-degree), assigned a student ID number, and enrolled them in a degree-credit class. In doing so, those responsible have compromised the integrity and validity of the campus fall enrollment data that is reported to the system office housed in ConnectND and reported nationally to the Integrated Postsecondary Education Data System (IPEDS) as required by federal regulations.

The NSSE data has since been corrected by removing the names of the conference and training session attendees while the IPEDS and ConnectND data remains unchanged. The Vice Chancellor for Academic and Student Affairs surveyed all 11 system campuses to determine the extent of the practice of enrolling conference and training attendees in degree-credit course.

### Leadership and Internal Controls:

Campus leadership was focused on continuing the multi-year trend of reporting enrollment growth but had not developed an effective plan to actually support and grow enrollment.

This situation resulted in pressure to report higher enrollment. This pressure from the Office of the President is what led to the former Director of Extended Learning and the admissions department to enroll conference attendees without following the proper enrollment process. This was done to maintain or increase enrollment levels.

The current leadership has created a campus culture that is divided, one of distrust, disrespect and staff being pressured to engage in unethical, suspect or wasteful activities to meet demands. This raises concerns about compliance with SBHE policies in general.



The following table summarizes the review objectives and links them with the results of the review. Review results include a reference to the detailed issues and Policy inconsistencies later in the report.

Review objective	Summary review results	Supporting Documentation
<p>1. <b>Enrollment Processing and Reporting</b> – Verify the answers submitted on Dr. Hillman's enrollment questionnaire were complete and accurate, understand the enrollment, enrollment reporting, admissions and tuition processes at DSU, the prerequisite requirements and how a student receives credit, how this enrollment inaccuracy was made, corrected, and any further enrollment policy updates to ensure future risks are mitigated.</p>	<p>DSU had six conferences/training sessions on various topics in the fall of 2010. Approximately 180 attendees were subsequently registered as students at DSU, received a Student ID number, registered in a degree credit course and received a grade without their consent or knowledge of formal course enrollment. The Office of Extended Learning and/or the Office of Enrollment Services are responsible for reviewing student applications for completeness. These attendees did not apply but were admitted under the direction of the Office of the President. All registered students are entered into ConnectND and reported as degree-credit students in the DSU and NDUS fall enrollment report and then reported to IPEDS and NSSE.</p> <p>NSSE suspended the survey process due to several calls from attendees and alerted the System office. The NSSE database has been corrected but the federal IPEDS and the state ConnectND databases remain unchanged.</p> <p><b>Potential impact:</b></p> <ol style="list-style-type: none"> <li>1. Negative impact on the reputation of the campus and the System</li> <li>2. Potential penalties and/or fines for incorrect IPEDS reporting</li> <li>3. Potential Federal and State Fiscal repercussions</li> <li>4. Potential funding discrepancies if future financial funding model is tied to enrollment</li> <li>5. Potential accreditation issues</li> <li>6. Potential State Auditor's Office (SAO) audit of enrollment system wide</li> <li>7. Additional time and cost to research and correct ConnectND database</li> </ol> <p><b>Result:</b></p> <p>These actions are not consistent with SBHE Policies 611.10, 308.1, 402.2, and 440</p>	<p>Sections 3.1, 3.2, &amp; 3.3</p>

2. **Leadership and Internal Control structure** – Verify that a system of internal controls exists and is being adhered to in regards to the enrollment and enrollment reporting process as well as to get an understanding of the current decision-making structure at the institution to ensure the correct guidance and leadership is in place.

Although an internal control structure does exist mostly in the form of SBHE policies, it appears controls and/or policies have been ignored or intentionally overridden.

**Potential impact:**

1. Negative impact on the reputation of the institution and System
2. Those interviewed have suggested that leadership has created an intimidating and distrustful culture which may have contributed to turnover, low morale and lack of respect for DSU leadership.

**Result:**

These actions are inconsistent with SBHE Policies 611.10, 308.1, 308.8, & 308.12

## NDUS Internal Review Report

### Section 1—Internal review process

#### 1.1—Review objectives, scope and work performed

##### Objectives

The objectives of this review can be categorized into two areas:

##### 1. Enrollment Processing and Reporting

1. Verify the accuracy of the DSU answers submitted on Dr. Hillman's enrollment questionnaire.
2. Understand the enrollment and admissions processes at DSU, the prerequisite requirements and how students receive credit for courses and conferences.
3. To understand:
  - a. how and why the conference attendees were registered as degree-seeking students,
  - b. the enrollment process, level of responsibility and approval structure,
  - c. the admissions process, level of responsibility and approval structure
  - d. the timeliness of these conference and attendee's being enrolled,
  - e. if tuition was paid for corresponding degree-credit classes,
  - f. if these actions have caused other financial impacts.
4. Determine if any of the conference attendee's should have received valid credit or dual credit for attending.
5. Verify the enrollment reporting overstatement was corrected and to update the existing enrollment policy(s) to ensure controls are in place so these types of risks are mitigated.
6. To ensure there is an adequate internal control structure in place at DSU and assess if these controls are working as designed.
7. Understand the collateral (other DSU departments) and subsequent (NDUS System Office) effects of these actions and determine that proper controls are in place to mitigate further risks.
8. To ensure the actions taken in the enrollment & enrollment reporting process will not violate any accreditation criterion.

##### 2. Leadership and Internal Control Structure –

- a. Gain an understanding of the overall Leadership structure currently in place at DSU
- b. Understand the current internal control structure as it relates specifically to the enrollment and enrollment reporting process, (including the financial reporting), Admissions, Extended Learning, and the Office of Business Affairs.
- c. To ensure any breakdown in the internal control structure will not violate any accreditation criterion.

This review specifically focused on assessing the extent to which policies, procedures and related internal control activities designed to manage specific institutional risks are operating effectively, efficiently and consistently throughout DSU and their subsequent effects on the NDUS.

Furthermore, according to the Higher Education Learning Commission's (HLC) Criteria for Accreditation section 1d, at any time, ~~the~~ board exercises its responsibility to the public to ensure that the organization operates legally, responsibly, and with fiscal honesty."

## Scope

The scope of this review is focused on how DSU is controlling and/or mitigating institutional risks specifically in the Enrollment area and with the overall Leadership of the institution. I interviewed DSU staff and Directors in the Office of Enrollment, Office of Extended Learning, and Admissions Office during this review to gather more information about the current control structure, the lack of or breakdown of controls, and the ability to override controls.

## Background and Work performed

The Enrollment and Leadership review methodology consisted of understanding the process flows, identifying and validating internal controls, identifying any performance gaps, and comparing data to current SBHE policy and other requirements. More specifically:

1. DSU holds various conferences and training events for the general public, university students, and local high school students to attend. In the fall of 2010 these conferences included:
  - BADM 399-Disney's Service and Hospitality- September 29, 2010
  - SCNC 399-Energy Technology August 8-10, 2010
  - BOTE 399-QuickBooks Training- Fall 2010
  - BOTE 399-Microsoft Training – Fall 2010
  - HIST 399--Theodore Roosevelt – September 16-18, 2010
  - History 399-9-Class was created to register Theodore Roosevelt attendees for credit
2. Credit for these classes was appropriately given to registered DSU students and qualifying dual-credit high school students; however, in fall 2010, all the non-student attendees were registered as DSU non-degree students, enrolled in a degree-credit class and given a grade without their knowledge or consent. Normally, the Office of Extended Learning and/or the Office of Enrollment Services are responsible for reviewing student applications to ensure all required data is complete before sending the application to the Office of admissions. These specific attendees did not complete the application process but were admitted and registered as students and entered into ConnectND.

The fall enrollment numbers from ConnectND are then submitted to IPEDS as required by federal law. IPEDS tracks several data points from the submitted data as detailed below. IPEDS notified DSU that several students' information was lacking critical data (age, gender, race) normally found on the application.

- The Higher Education Act of 1965, as amended, requires that institutions that participate in federal student aid programs report data on enrollments, program completions, graduation rates, faculty and staff, finances, institutional prices, and student financial aid.

IPEDS collects data on Institutional Characteristics, Institutional Prices, and finances among other items. With Enrollment data, they specifically track:

**Fall Enrollment** — fall enrollment is the traditional measure of student access to higher education. Fall enrollment data can be looked at by race/ethnicity; gender; enrollment status (part-time or full-time); and or level of study (undergraduate or graduate).

**Residence of First-Time Students** — Data on the number of first-time freshmen by state of residence, along with data on the number who graduated from high school the previous year, serve to monitor the flow of students across state lines and calculate college-going rates by state. These data are collected in even-numbered years.

**Age Data** — the age distribution of enrolled students offers insight into the relationship between the changing demographics of college-going cohorts and enrollment in different types of postsecondary institutions. They also permit detailed projections of enrollment by institutional type and by age. Because a student's dependency status is strongly related to age, the data can be used to provide estimates of the number of independent and dependent students attending postsecondary institutions. These data are collected in odd-numbered years.

**Unduplicated 12-Month Head Count** — Enrollment figures based on the unduplicated head count of students enrolled over a 12-month period is particularly valuable for institutions that use non-traditional calendar systems and offer short-term programs. Because this enrollment measure encompasses an entire year, it provides a more complete picture of the number of students these schools serve.

**Instructional Activity** — Data on instructional activity is measured in total credit and/or contact hours delivered by institutions during a 12-month period.

**Total Entering Class** — Data on the number of incoming students (students enrolling for the first time in a postsecondary institution versus students transferring in from another postsecondary institution) at an institution. This measure permits the calculation of the graduation rate cohort as a proportion of the total entering student body.

#### IPEDS also collects:

**First-Year Retention Rates** — the first-year retention rate measures the percentage of first-year students who had persisted in or completed their educational program a year later. These data have been collected since 2003.

**Graduation Rates** — Graduation rate data provide information on institutional productivity and help institutions comply with reporting requirements of the Student Right-to-Know Act.

3. DSU enrollment is then extracted from ConnectND and submitted by the campus to NSSE for survey purposes however due to several calls from conference attendees stating they were not DSU students; NSSE stopped the reporting and notified Dr. Michel Hillman, Vice Chancellor for Academic and Student Affairs in February 2011.

NSSE annually (November) collects information at hundreds of four-year colleges and universities about student participation in programs and activities that institutions provide for their learning and personal development.

NSSE provides participating institutions a variety of reports that compare their students' responses with those of students at self-selected groups of comparison institutions.

NSSE doesn't assess student learning directly, but survey results point to areas where colleges and universities are performing well and aspects of the undergraduate experience that could be improved.

4. Based upon the NSSE report, Dr. Hillman developed and sent a short survey to all institutions to gather enrollment information and to determine if other nuances existed within the system. Please see section 3.2 for Dr. Hillman's survey results. Dr. Hillman and I interviewed DSU staff and Directors involved with the completion of the survey to:
  - a. Verify the survey answers that were submitted by DSU were complete and accuracy.
  - b. Gain a more detailed understanding of the DSU enrollment process to ensure the internal control structure is in place and
  - c. To further strengthen the SBHE enrollment policy(s) to ensure these types of actions and risks are mitigated.
5. Dr. Hillman and I conducted further interviews with key personnel from the offices listed below, who are responsible for gathering and reporting data. The offices also had knowledge of the past and current processes and the internal controls surrounding the enrollment, admissions, grading, tuition and financial reporting processes. On May 4, 2011 Dr. Hillman and I interviewed the following DSU staff:
  - a. Office of the President
  - b. Office of Institutional Research & Planning
  - c. Vice President for Academic Affairs
  - d. Vice President for Business Affairs
  - e. Controller
  - f. Director of Academic Records
  - g. Admissions Specialist and Assistant Registrar

6. Based upon the interviews on May 4th, it was determined to continue the review and interview additional staff members to determine the source of the approval for the enrollment overstatement as most interviewees stated they were directed by their superior. As described above in #2, The Office of Extended Learning and/or the Office of Enrollment Services are responsible for reviewing student applications to ensure all required data is complete before sending the application to the Admissions office. These attendees did not complete the application process but were admitted and registered as non-degree seeking students in degree-credit classes.
7. DSU had at least three different opportunities to stop these attendees from being registered in degree-credit courses; The Office of Extended Learning, Office of Enrollment and Admissions office should have rejected these students due to a lack of an application for admission. Because of the collaboration between offices and the overriding nature of SBHE policies, these activities were directed and approved by the Office of the President. Additionally, it was determined to question individuals regarding the Leadership or ethical tone on campus.

The following DSU staff members were interviewed on May 13, 2011:

- a. Coordinator of Institutional Research & Planning
  - b. Director of Enrollment Services
  - c. Assistant, Office of Extended Learning
  - d. Director of Extended Learning
  - e. Director of University Relations
  - f. Former Director of Extended Learning
8. The DSU staff members and Directors interviewed agree this was a new enrollment reporting practice for Fall 2010 and it was not a normal course of action, it involved questionable practices, and was not consistent with other practices at system institutions and it had not been done in previous years.

In 2008 and 2009, it was possible to earn degree-credit from DSU for the conferences. The difference in 2008 & 2009 was the participants had to complete a registration form stating they would like to receive credit. The attendees were then entered into ConnectND/PeopleSoft and registered as non-degree students. In 2010, the registration form was not used and all participants were registered without their consent or knowledge.

9. When comparing the actions taken by DSU to SBHE policies and Higher Learning Commission's (HLC) Accreditation Criterion requirements, several inconsistencies stand out.
  - a. IPEDS require that degree credit enrollments be reported. Most of these conference attendees were not degree seeking students. Since these students did not go through an admission and registration process it could not be determined if they met the SBHE admission policy requirements. Also, the SBHE establishes tuition rates for degree credit courses. Students apparently only paid a conference fee, not tuition. Most students and employees had the conference fee waved.

- b. There is no evidence that the conferences alone comprised courses which had received faculty approval through the campus academic approval process. It should be noted that a small number of dual credit and regular degree seeking students enrolled in the conferences and more appropriately received academic credit for conference related activities. These students were required to participate in classroom discussions, submit papers and engage in other activities which provided a basis for grading.
    1. *HLC Section 3a, the institutions assessment of student learning extends to all educational offerings, including credit and noncredit certified programs.*
    2. *HLC Section 4b, Learning outcomes demonstrate effective preparation for continued learning.*
  - c. The typical conference participant received an "A" grade just for attending the sessions. Attendees who did not attend all sessions were withdrawn from the courses. In this sense it was not possible for attendees to fail the course and, other than the exceptions noted above, there was no grading basis for these activities. Additionally, 'faculty of record' was assigned in an ad hoc manner and students did not receive notification of grades for these courses until after this investigation was begun. All of this led to conference registrants not being aware that they were considered to be "students".
    1. *HLC Section 1d, Assessment of student learning provides evidence at multiple levels: course, program, and institutional.*
    2. *HLC Section 3a, Faculty is involved in defining expected student learning outcomes and creating the strategies to determine whether those outcomes are achieved.*
10. This situation challenges the academic validity and integrity of these activities. The NDUS enrollment survey indicated that all other system campuses make a clear distinction between degree credit and non-degree credit and would not have awarded degree credit in the DSU conference only situation. It was also apparent that fall 2010 was the first time that *all* conference attendees (including employees), were enrolled in degree credit courses at DSU. As stated earlier, in prior years the attendees had to request credit by completing a registration form and only then were enrolled as a non-degree student . Please see section 3.2 for survey results.



## Section 2—Internal review results

### 2.1—Detailed issues and corresponding SBHE policy's

This section of the report details the process observations identified during the review. Each issue listed includes a brief background description, a statement of potential impact, and a recommended solution.

All details and supporting documentation were supplied by DSU staff.

Observation and Recommended Solution	Corresponding Policy
<p><b>1. Enrollment Processing and Recording</b></p> <p><b>Background:</b> Approximately 180 people, who attended six different conferences offered by or in conjunction with DSU, were registered as new non-degree students, enrolled in a degree credit course and received a grade. The enrollment numbers then were submitted to IPEDS and student names submitted to NSSE for survey purposes however, due to phone calls from attendees; NSSE stopped the survey process and alerted the System Office. IPEDS also alerted DSU that several students were missing critical data on the enrollment report. See section 3.2 for list of attendees as registered students and subsequently reversed.</p> <p><b>Issue: DSU officers knowingly entered non-students as students thus overstating the enrollment data</b> DSU officers intentionally entered conference attendees in the fall 2010 enrollment numbers in an attempt to increase enrollment. This overstatement compromises the integrity and validity of the enrollment data. The student enrollment issue has been corrected in NSSE; however IPEDS and ConnectND are still incorrect.</p> <p><b>Potential impact:</b></p> <ol style="list-style-type: none"> <li>1. Negative impact on the reputation of the campus and the System</li> <li>2. Potential funding allocation discrepancies. If the new University System funding model is tied to or uses enrollment as a factor, overstated institutional enrollments would result in additional allocations if not corrected. It is not yet known if the new finance plan will be dependent on enrollments.</li> <li>3. Potential penalties and/or fines. Correcting a past enrollment number in IPEDS may result in fines and/or penalties levied against the institution and/or System. Currently the penalty is \$27,000 (from website) per occurrence and there may be more than one occurrence due to the reporting structure.</li> <li>4. Potential other State and/or Federal fiscal repercussions.</li> <li>5. Potential Accreditation reviews. The Higher Learning Commission may review academic and financial criteria to ensure compliance.</li> </ol>	<p>This is not consistent with SBHE Policy number's:</p> <p><b>611.10 – Fraud and Theft</b> –unlawful or improper use of public resources" and failure to maintain a system of internal controls and a corresponding reporting of unlawful or improper use of public resources as outlined by the policy, and</p> <p><b>308.1, Officer and Employee Code of Conduct -Section 2 - General Conduct – Unauthorized use of public property or resources and other unauthorized activities that disrupt the efficient and economical administration of NDUS," and</b></p> <p><b>308.8 – NDUS Records and Communication – Board members, officers and employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to, false expense, attendance, enrollment, financial, or similar reports and statements.....or other misleading representations," and</b></p> <p><b>402.2 – Admission Policies – Beginning Freshman Applicants</b> – The conference attendee's did not meet the qualifications for or go through an approved SBHE admissions process as outlined in this policy and</p> <p><b>440 – Enrollment Reporting - The conference attendee's did not meet the qualifications for or go through an approved SBHE enrollment</b></p>

6. The SAO may do a system wide audit of enrollment practices and reporting.
7. The state enrollment database —ConnectND" still has not been corrected thus over reporting system-wide enrollment records as well.

process as outlined in this policy.

Please see Section 3.1 for SBHE policies that correspond to the above.

**Recommended solution:**

1. Correct the enrollment data in IPEDS and ConnectND to ensure all enrollment records are as accurate as possible.
2. Revise SBHE enrollment policies as necessary to provide clear guidance to campuses regarding degree-credit enrollments.
3. DSU should immediately implement and use the Continuing Education/Distance Learning transcript for all non-degree credit courses to better track and record all enrollments.
4. DSU should clearly differentiate between degree credit and non-degree credit activities.

Observation and recommended solution	Corresponding policy
<p><b>2. Leadership and internal controls structure</b></p> <p><b>Background:</b> An internal control framework, in the form of SBHE policies and procedures does exist at DSU however it appears controls have been ignored or intentionally overridden. In addition, interviewees suggest that the leadership on campus has created a culture where controls and best practices are often disregarded.</p> <p><b>Issue: DSU leadership has not complied with all applicable SBHE policies</b> Alleged lack of or disregard for internal controls coupled with a failure to stop improper activities, may require additional system reviews to ensure compliance with SBHE policies.</p> <p><b>Potential impact:</b></p> <ol style="list-style-type: none"> <li>1. Negative reputation of the Institution and the NDUS system</li> <li>2. Those interviewed, have suggested that leadership has created an intimidating and distrustful culture which may contribute to turnover, low morale and lack of respect for DSU leadership.</li> </ol> <p><b>Recommended solution:</b></p> <ol style="list-style-type: none"> <li>1. Additional reviews or audits may need to be completed to ensure SBHE policies are being adhered to.</li> <li>2. Completing a more detailed Entity-wide Risk Assessment to fully understand the internal control structure in place and if the controls are working as designed.</li> </ol>	<p>The lack of compliance regarding an internal control structure may be inconsistent with the following SBHE policy numbers:</p> <p><b>611.10 – Fraud and Theft –</b> –Unlawful or improper use of public resources” and failure to maintain a system of internal controls and a corresponding reporting of unlawful or improper use of public resources as outlined by the policy,” and</p> <p><b>308.1, Officer and Employee Code of Conduct -section 2 General Conduct –</b> –Unauthorized use of public property or resources and other unauthorized activities that disrupt the efficient and economical administration of NDUS”, and</p> <p><b>308.8 – NDUS Records and Communication –</b> –Board members, officers and employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to, false expense, attendance, enrollment, financial, or similar reports and statements.....or other misleading representations,” and</p> <p><b>308.12 – Reporting Suspected Violations; Procedures for Investigating Reports –</b> –Officers and employees shall report suspected violations of this code to their superior.”</p> <p>Other SBHE policy inconsistencies are to be determined based on the additional reviews.</p>

## Section 3—Supporting Documentation

### 3.1—NDUS SBHE related policies

**SUBJECT:** 600s: Personnel

**EFFECTIVE:** September 21, 2006

**Section:** 611.10 Employee Responsibility and Activities: Theft and Fraud

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1. Each employee, as a basic condition of employment, assumes responsibility for safeguarding and preserving the assets and resources of the state and university system and its institutions, particularly those for which the employee is responsible.
2. Each institution and the system office shall develop and implement controls designed to minimize opportunities for theft, fraud or unlawful or improper use of public resources, including funds, supplies and property. The controls must include a process for reporting of suspected theft, fraud or unlawful or improper use of public resources, designation of an officer with responsibility for receiving and investigating such reports, a process for investigation, audit or referral to law enforcement officials if there is reasonable basis to suspect theft, fraud, or unlawful or improper use of public resources and a report summarizing findings, disposition and, if appropriate, recommendations for additional controls to prevent recurrence.
3. Each employee is expected to report suspected theft, fraud or unlawful or improper use of public resources to a supervisor, department head, chief fiscal officer or other institution or system officer designated with responsibility for receiving and investigating such reports.
4. An employee found to have engaged in theft, fraud or unlawful or improper use of public resources, or an employee with knowledge of such acts by another who unreasonably fails to report such information as required by this policy, is subject to discipline, up to and including dismissal.
5. As used in this policy, "theft, fraud or unlawful or improper use of public funds or property" includes:
  - a. stealing, larceny or embezzlement;
  - b. making or altering documents or files with the intent to defraud;
  - c. purposely inaccurate accounting or financial reporting at any level;
  - d. fraudulent conversion or misappropriation of public resources, including funds, supplies or other property;
  - e. improper handling or reporting of financial transactions;
  - f. authorizing or receiving compensation for goods not received, services not performed or hours not worked, including payment or receipt of a bribe, kickback or other unlawful or unauthorized payment.

**History:**

New policy. SBHE Minutes, September 21, 2006.

**SUBJECT:** 300s: Governance and  
Organization

**EFFECTIVE:** June 17, 2010

**Section:** 308.1 Officer and Employee Code of Conduct

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1. Introduction and Application.

This Officer and Employee Code of Conduct governs the State Board of Higher Education and its members and establishes minimum standards for all NDUS officers and employees. The Board and entire NDUS are committed to uphold the highest ethical and professional standards. All Board members and NDUS officers and employees must, at all times, comply with all applicable laws, regulations, policies and procedures. Activities that achieve results unlawfully or in violation of applicable policies or procedures or by unethical behavior - including, but not limited to, payments for illegal acts, indirect contributions, rebates, or bribery - are not tolerated and must be reported. All conduct must meet or exceed minimum standards established by law.

The Board has established its Beliefs and Core Values in SBHE Policy 100.5 and in SBHE Policy 100.6, the Board sets forth Authority and Responsibility of the Board, including its Guiding Principles. SBHE Policies 100.5 and 100.6 establish a foundation or framework for Board action and conduct of its members and NDUS officers and employees; this Code of Conduct reinforces and supplements those policies.

2. General Conduct.

The Board supports an environment that is free of discrimination or harassment. All Board members, officers and employees are expected to conduct themselves in a businesslike manner. Unlawful consumption of alcoholic beverages or use of illegal drugs, being at work while under the influence of alcohol or drugs, disruptive behavior, unlawful gambling, unauthorized use of public property or resources and other unauthorized activities that disrupt the efficient and economical administration of the NDUS, are prohibited. Violation of applicable laws or policies governing possession and use of alcoholic beverages or drugs, including the Drug Free Workplace Act, SBHE Policy 615 or applicable system office or institution policies, are prohibited. Likewise, sexual or other harassment (including actions contributing to a hostile work environment) in violation of federal or state law or SBHE Policy 603.1, is prohibited.

3. Conflicts of Interest.

All Board members, officers and employees are expected to perform their duties conscientiously, honestly, and in accordance with the best interests of the NDUS. All Board members, officers and employees must comply with applicable federal and state laws. Board members, officers and employees may not unlawfully use their position or the knowledge gained as a result of their position for private or personal advantage. All Board members, officers and employees are responsible for their own actions. Any individual who has concerns or questions regarding a perceived or potential conflict or regarding application or interpretation of federal or state law or SBHE policy is encouraged to communicate with a superior or with legal counsel.

4. Outside Activities and Employment.

Board members, officers and employees share responsibility for good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to the NDUS and is encouraged. However, officers and employees must comply with applicable federal and state laws, policies in Section 611 of the SBHE Manual and related system office and institution policies. At all times, employees must avoid outside activities that create an excessive demand upon their time and attention, thus depriving the NDUS of their best efforts in fulfilling their job duties or that create a conflict of interest, or an obligation, interest, or distraction that interferes with the independent exercise of judgment in the NDUS' best interest.

5. Relationships With Clients and Suppliers; Conflicts of Interest.



Board members are not NDUS employees and may have other full or part-time employment and other professional, civic and personal responsibilities and activities, in addition to their part-time service as Board members. Nevertheless, Board members must be familiar with and comply with applicable laws governing conflict of interest that apply to Board members and should strive to avoid other activities that create an obligation, interest or distraction that interferes with the independent exercise of judgment in the best interest of the NDUS. They should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with the NDUS or NDUS institution, or that provides goods or services to the NDUS, if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties.

6. Gifts, Entertainment and Favors; Kickbacks and Secret Commissions.

Excluding only *de minimis* contributions, such as purchase of a meal at reasonable value as part of a conference or other event with no conditions attached to such purchase and as permitted under applicable federal and state laws, Board members, officers and employees may not accept entertainment, gifts, or personal favors that could influence, or appear to influence, decisions in favor of any person or organization with whom or with which the NDUS or NDUS institution has, or is likely to have, business dealings. Similarly, Board members, officers and employees may not accept any other preferential treatment under circumstances that because of their position with the NDUS, the preferential treatment may influence or be perceived as influencing their official conduct. Board members, officers and employees may not receive payment or compensation of any kind from any source for NDUS duties and responsibilities, except as authorized under applicable law or NDUS pay policies. Specifically, the acceptance of "kickbacks" or commissions in any form from vendors, suppliers or others is prohibited.

7. NDUS Funds and Other Assets.

Board members, officers and employees who have access to NDUS funds and other assets in any form must follow the prescribed procedures for recording, handling, and protecting money and other assets as detailed in applicable NDUS procedure manuals or other explanatory materials. Any person who has information concerning possible fraud or dishonesty shall immediately report such information to a superior or to legal counsel.

Board members, officers and employees responsible for spending or approving expenditure of NDUS funds or incurring any reimbursable expenses must comply with all applicable laws and policies and use good judgment on behalf of the NDUS to ensure that good value is received for every expenditure. NDUS funds and all other assets are for NDUS purposes only and not for personal use or benefit. NDUS or other public equipment, supplies and other property or assets may not be used for private or personal use, except as authorized under SBHE Policy 611.5 or other applicable law or policy.

8. NDUS Records and Communications.

Accurate and reliable records of many kinds are necessary to meet NDUS legal and financial obligations and to manage the affairs of the NDUS. NDUS books and records must reflect in an accurate and timely manner all business transactions. Board members, officers and employees responsible for accounting and recordkeeping must fully disclose and record all assets and liabilities and exercise diligence in enforcing these requirements. Board members, officers and employees must not make or engage in any false record or communication of any kind, whether internal or external, including, but not limited to, false expense, attendance, enrollment, financial, or similar reports and statements, or false advertising, deceptive marketing practices, or other misleading representations.

9. Dealing with Outside People and Organizations.

Board members, officers and employees must take care to separate their personal roles from their NDUS positions when communicating on matters not involving NDUS business. They may not use NDUS identification, stationery, supplies, and equipment for personal or political matters. When communicating publicly on matters that involve NDUS business, Board members, officers and employees may not represent that they speak for the NDUS, unless that is one of their duties or they are otherwise authorized to do so. When dealing with anyone outside the NDUS, including public officials, Board members, officers and employees must take care not to compromise the integrity or

damage the reputation of the NDUS or any institution.

10. Prompt communications.

In all matters involving communication with NDUS students, customers, suppliers, government authorities, the public and others, Board members, officers and employees must endeavor to make complete, accurate, and timely communications and respond promptly and courteously to all proper requests for information and complaints.

11. Privacy, Confidentiality and Open Records.

Board members, officers and employees must at all times comply with applicable laws, regulations and SBHE policies concerning privacy, confidential records, access to open records and records retention.

12. Reporting Suspected Violations; Procedures for Investigating Reports.

Officers and employees shall report suspected violations of this Code to their superior, some other senior manager or administrator or legal counsel. In addition, the NDUS shall maintain a fraud hotline and suspected violations may be reported by use of that hotline. Any officer or employee who makes a report in good faith shall be protected against retaliation of any kind; any officer or employee who retaliates or attempts retaliation in response to a good faith report shall be subject to dismissal or other discipline. Failure to report known or suspected violations is in itself a violation and may lead to dismissal or other disciplinary action.

Board members who have information concerning a possible violation of this Code or are uncertain about application or interpretation of any legal requirement should report the matter to the chancellor, legal counsel or the attorney general.

Alleged violations of this Code involving NDUS officers or employees shall be investigated by the appropriate NDUS officer. All officers and employees shall cooperate in investigations of alleged violations. A violation of this Code is cause for dismissal or other appropriate disciplinary action, in addition to any criminal or other civil sanctions that apply.

13. Institution Codes.

The NDUS office and each NDUS institution shall adopt and implement a Code of Conduct consistent with this Code and Committee of Sponsoring Organization of the Treadway Commission (COSO) standards. NDUS office and institution codes shall include:

- a. A statement of the organization's values;
- b. The people or groups of people affected;
- c. A brief description or list of key behaviors that are accepted and not accepted;
- d. How to identify and resolve conflicts of interest;
- e. How to report violations and to whom;
- f. Consequences of violating the Code;
- g. Consequences of failure to report known or suspected violations; and
- h. How reports will be investigated.

The NDUS office and each institution shall require that each new employee review the Code of Conduct and sign a statement certifying the employee has read and agrees to comply with the Code. Further, all benefitted employees are required to annually certify in writing or electronically that they have read and are in compliance with the Code of Conduct.

**SUBJECT** : 400s: Academic Affairs

**EFFECTIVE** : June 17, 2010

**Section:** 402.2 Admission Policies - Beginning Freshman Applicants - Baccalaureate Programs

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1. A beginning freshman applicant who is a high school graduate may be admitted to baccalaureate programs subject to this policy.
2. Admission to baccalaureate and graduate institutions requires completion of the following high school curriculum, except as provided in subsection 5 of this policy:
  - o 4 units of English
  - o 3 units of mathematics, algebra I and above
  - o 3 units of laboratory science, including at least 1 unit each in 2 or more of the following: in biology, chemistry, physics, or physical science
  - o 3 units of social studies, excluding consumer education, cooperative marketing, orientation to social science, and marriage/family

The following high school courses are also strongly recommended: A mathematics course in each year of high school including Algebra II (advanced algebra) and 2 units of a single classical or modern language, including American Sign Language and Native American languages.

3. International students shall be considered for admission if their high school preparation is judged to be equivalent to the above, subject to meeting the TOEFL requirements of 402.9(3).
4. The university system office shall maintain a manual describing specific secondary courses that comply with the above requirements.
5. Students age 25 or older on the first day of class are exempt from the requirement stated in subsection 2. In addition, Dickinson State University, Mayville State University, Minot State University and Valley City State University may enroll 10% and North Dakota State University and the University of North Dakota may enroll 5% of the previous fall's new freshmen enrollment who have not had the required high school courses, subject to guidelines established by the Chancellor. Each baccalaureate institution shall admit such students through a review procedure established by the campus. Campuses must track and, under implementing procedures approved by the chancellor, report the progress of all students admitted under this exception.
6. Baccalaureate institutions may establish additional criteria beyond the core curriculum stated in subsection 2 for the admission of students to the institution.

**History:**

New policy. SBHE Minutes, January 31, 1991, page 6089.

Amendment SBHE Minutes, September 19-20, 1991 page 6162.

Amendment SBHE Minutes, December 17, 1992, page 6309.



Amendment SBHE Minutes, February 21-22, 2002.  
Amendment SBHE Minutes, June 17, 2010.

**SUBJECT:** 400s: Academic Affairs

**EFFECTIVE:** December 20, 2007

**Section:** 440 Enrollment Reporting

System degree credit enrollment reporting is intended to be consistent with United States Department of Education Integrated Postsecondary Data System definitions for measures of instructional activity on an annual basis. The measures are adjusted for a semester basis for term reporting.

1. Fall and Spring Enrollment Reports

Each campus shall report fall and spring semester enrollments for degree credit students based on the number of students enrolled on the twentieth scheduled class day of the fall and spring semesters. "Enrolled" means: the student has registered and paid tuition and fees, made arrangements to pay or a plan for payment is in place; an extension has been granted as provided by Policy 830.1; or, the institution has other documentation the student is registered and in attendance, including, for example, documented class attendance or student access or use of a learning management system or other online services on or after the first scheduled class day of the semester.

2. Annual Enrollment Reports

- a. Each campus shall, for each reporting period, report to the university system office numbers of all students by category as defined by this policy. The university system office shall prepare and submit to the Board an annual system report, including unduplicated degree credit, non-degree credit, and non-credit enrollment for each campus and the system at the end of each academic year.
- b. Annual reports shall include categories for all degree credit students, non-degree credit students, and non-credit students and include total head count. Reports shall include non-duplicated totals at the campus and system level.
  1. Reports for degree credit students also shall include full-time, part-time, and full-time equivalency (FTE) numbers; numbers of new freshmen; and transfer students.
  2. All degree credit and non-degree credit enrollments shall be reported based on information in the administrative information system. Reports shall include course delivery mode and location for site-based courses.
  3. Annual enrollment reports shall include all enrollments for which the student did not get a 100% tuition refund.
  4. Non-credit students shall be reported based on the numbers of students participating in all non-credit education and training activities.

3. Definitions.

- a. Degree credit students means students enrolled in institutional instructional activities which result in the award of college credit that can be applied toward a college degree or credit-

based remedial courses taken by degree seeking students.

- b. Non-degree credit students means students enrolled in institutional instructional activities, with the exception of remedial courses typically taken by degree seeking students, which result in the award of college credit which typically cannot be applied toward a college degree. Non-degree credit activities include attached credit.
- c. Non-credit students means students enrolled in all institutional activities, including CEU only activities, which do not result in award of college credit immediately upon completion of the activity.
- d. Annual report year means a complete summer term and succeeding fall and spring semesters.
- e. New, or first-time freshmen, means students entering any institution for the first time at the undergraduate level, including students enrolled in the fall term who earned college credits in the prior summer term and/or entered with advanced standing before graduation from high school.
- f. Transfer students means students who have earned college credit at another postsecondary institution following high school graduation.
- g. Full-time undergraduate students means undergraduate students who are enrolled in 12 or more credit hours during fall or spring semester.
- h. Full-time graduate students means graduate students enrolled in 9 or more credit hours during fall or spring semester. For institutional academic administration purposes, other assignments may be taken into consideration when considering the full-time status of a graduate student.
- i. Full-time professional students means medicine, law and pharmacy students enrolled in 9 or more credit hours during the fall or spring semester.
- j. Part-time students means all students enrolled in courses for credit but less than full-time.
- k. Total head count means all students enrolled in courses for degree credit. Auditing students are not included in total head counts.
- l. Full Time Equivalency (FTE) on a semester basis means undergraduate total credit hours divided by 15; graduate total credit hours divided by 12. Full-time equivalency on an annual basis means undergraduate total credit hours divided by 30; graduate total credit hours divided by 24. Professional student FTE are equal to headcount for full-time students and .5 FTE for part-time students.

**History:**

Replaces Article II, Section 3-A, page II-13. SBHE Minutes, May 10-11, 1984, page 5242.  
 Amendments SBHE Minutes, June 26, 1986, page 5504.  
 Amendments SBHE Minutes, January 28, 1999, page 6947.  
 Amendment SBHE Minutes, May 12, 1999, page 6984.  
 Amendment SBHE Minutes, April 26-27, 2001.  
 Amendment SBHE Minutes, August 17, 2006.  
 Amendment SBHE Minutes, December 20, 2007.

### 3.2--NDUS survey results sent to and completed by all institutions

## Summary of NDUS Enrollment Reporting Practices

*Questions prepared by Mike Hillman, NDUS Vice Chancellor of Academic and Student Affairs (3/3/2011)*

*Summary prepared by Lisa Johnson, NDUS Director of Articulation and Transfer (3/28/2011) Revised (4/16/2011).*

- 1) What practices differentiate degree-credit, non-degree credit, non-credit, and attached credit enrollments and enrollment reporting across campuses?

Campuses consistently reported practices in compliance with SBHE Policy 440 Enrollment Reporting that details semester enrollment reporting, annual reporting, and related Integrated Postsecondary Education Data System (IPEDS) definitions.

#### Degree Credit

Campuses consistently reported that degree credit was applicable to a degree program, reflected on the official academic transcript, and reported in semester and annual enrollment reports.

#### Non-Degree Credit

The bulk of non-degree credit activity is comprised of teacher education workshops taught through MiSU, UND, NDSU, and VCSU. The NDUS and NDUS procedures refer to this as attached credit but only when referring to associated tuition. No formal definition of attached credit exists. A proposed definition of attached credit has been drafted and will be submitted to the data dictionary group. Only recently, MaSU and DSU have been granted SBHE permission to offer limited graduate credit—primarily teacher education workshops and limited graduate credit through documented, collaborative partnerships with established graduate programs in ND. At present, it appears that non-degree headcount reported in the NDUS Annual Report is significantly less than non-degree headcount on file at institutions.

Math 102 Intermediate Algebra continues to be unresolved and entered inconsistently across the state. A conversation with the Mayville State University registrar suggests that their administrators interpret MaSU's mission as serving underprepared students in their region and are an open enrollment institution. Therefore, Math 102 is set up as degree credit and applies to the undergraduate degree. Other schools like DCB and NDSCS, do not use the agreed upon method of entering a S/U grading basis that excludes developmental courses from GPA calculations, but allows credits to be applied to those programs specified in NDUS Policy 403.9 Developmental Courses. BSC's proposed changes to Math 102 by replacing Math 102 with a true degree applicable technical math course and a sequence of developmental courses (numbered less than 100) may alleviate this issue.

Generally, students enrolled in developmental courses also enroll in at least one or more degree credit course and are included in headcount reported on a semester and an annual basis for this reason. However, those students enrolled ONLY in non-degree developmental courses are not included in semester reports. Non-degree headcount is reported only once per year as a table within the annual enrollment report comprised of summer, fall, and spring enrollment figures.

#### Non-Credit

Non-credit courses do not apply to a degree and are not recorded on the official academic transcript. They are, however, reported separately to the NDUS by the offices of extended learning, continuing education, or TrainND in a format provided by the NDUS staff and are reported within the annual enrollment report comprised of summer, fall, and spring enrollment figures.

- 2) Are all students in degree-credit courses required to be either fully admitted students or a special admit type with permission to take specific courses?

Campuses consistently reported that all students in degree credit courses were to be either fully admitted or admitted under an approved special admit type. Those special admit types include Early Entry to admit high school students enrolled in dual credit classes according to NDUS Procedure 402.3.1, collaborative students according to NDUS Procedure 404, and non-degree seeking students—typically capped between 16-20 semester hours of coursework.

- 3) Are contact hour (or contact hour equivalent) or student learning outcome policies in place on campus for degree-credit courses? If so, what is the contact hour policy? If not, what is the criteria for awarding credit for these courses?

Institutions across the country, including the responses of campuses of the North Dakota University System, report contact hours based on Carnegie Classification and regional accreditation standards, awarding credit in traditional classes and laboratories based on seat-time. In lecture classes, one college hour of lecture per week per semester equates to one credit hour. In laboratory and shop classes, the ratio is typically two to one or three to one, with students spending two, or three, hours per week per semester for one college credit. In cases where classes do not continue for the whole of a traditional 16 week semester, class time is adjusted to meet the same standards. For example, ENGL 110 meets three times per week for a 16 week semester for a total of 48\* class hours. If ENGL 110 is offered in an eight week format, the class meets six hours per week for those eight weeks for a total of 48 class hours.

Few responses were received regarding campus policies on student learning outcomes. It may have been that with enrollment reporting the focus of this informal survey—student learning outcomes were not foremost in the minds of those reporting. Furthermore, there is no place within the ConnectND student information system to enter course outcomes. At present, student outcomes are documented on individual course syllabi and often incorporate departmental and campus outcomes.

- 4) Are minimum calendar day per credit hour requirements in place on campus for degree-credit courses? If so, what are the requirements? If not, what criteria define degree-credit hour requirements on campus?

Campuses generally referenced practices in compliance with SBHE Policy 406.1 Academic Calendars consisting of 15-16 weeks of instruction per semester. Those campuses that reported 15 weeks of instruction schedule an additional week of final examinations. Those campuses that reported 16 weeks of instruction included one week of final examinations in their term scheduling. Shorter sessions, within a term, are common at every institution. Most common are two eight-week sessions within a term. Bismarck State College manages the most sessions (72) consisting of varying start and end dates to accommodate instructional offerings.

- 5) Are enrollments outside of the timelines of the official term <http://www.ndus.edu/uploads/resources/1756/academic-calendar-2010-11-thru-2014-15.pdf> ever reported as part of fall term enrollments?

All campuses reported that degree credit courses are assigned to a particular term. In rare instances, classes may start a few days prior or conclude days after a particular term. In some cases, when dual credit courses are taught in the high school over a period of one school year, students may be enrolled the fall semester, but conclude the course in the spring semester. Dual credit students enrolled in courses over a period of one year are only reported in enrollment reporting for the fall semester.

- 6) Is it possible to obtain degree-credit on your campus based only on attendance?

All campuses, with the exception of DCB and DSU, reported that it is not possible to obtain degree credit based only on attendance. DCB's rationale that HPER courses—specifically varsity sports—earn credit for attending practice, participating in games, and most likely EXCEED normal contact hours for college credit. That may be true for varsity sports at any institution.

DSU indicated that students may receive degree credit for attending workshops and are notified in workshop or symposium marketing materials of this practice. Those students are enrolled in special topics courses numbered 299 or 499. DSU refers to this as attached credit although it differs from the NDUS' interpretation of attached credit.

### 3.3— List of conference attendees reversed from NSSE

Names have been removed to protect personal information

\*Lines without color (white) were used as a sample for DSU transcript review

\*\* Student ID numbers have been deleted as these also represent valid employee numbers  
 Bolded lines are a sample of current DSU employees who were registered as student. (Not a complete list)

<u>First &amp; Last Name</u>	<u>StudentID**</u>	<u>Class</u>	<u>Enrollment</u>	<u>Gender</u>	<u>Race</u>	<u>Program</u>	<u>Removed</u>
*	1	Freshman	PT	F	WHITE	Non-Degree	Disney
	2	Freshman	PT	F	WHITE	Non-Degree	Disney
	3	Freshman	PT	M	NSPEC	Non-Degree	Disney
	4	Freshman	PT	F	WHITE	Non-Degree	Disney
	5	Senior	PT	M	WHITE	Business Administration	Disney
	6	Senior	PT	F	WHITE	Non-Degree	Disney
	7	Freshman	PT	F	WHITE	Non-Degree	Disney
	8	Freshman	PT	M	NSPEC	Non-Degree	Disney
	9	Freshman	PT	F	NSPEC	Non-Degree	Disney
*	10	Senior	PT	F	WHITE	Non-Degree	Disney
	11	Senior	PT	F	WHITE	Non-Degree	Disney
	12	Senior	PT	F	WHITE	Non-Degree	Disney
	13	Freshman	PT	F	WHITE	Non-Degree	Disney
	14	Freshman	PT	M	WHITE	Non-Degree	Disney
	15	Freshman	PT	M	NSPEC	Non-Degree	Disney
	16	Senior	PT	F	WHITE	Non-Degree	Disney
	17	Freshman	PT	M	WHITE	Non-Degree	Disney
	18	Freshman	PT	F	WHITE	Non-Degree	Disney
	19	Freshman	PT	F	WHITE	Non-Degree	Disney
*	20	Freshman	PT	F	NSPEC	Non-Degree	Disney



	21	Freshman	PT	F	WHITE	Agricultural Studies	Disney
	22	Freshman	PT	F	WHITE	Practical Nursing	Disney
	23	Freshman	PT	F	WHITE	Business Administration	Disney
	24	Freshman	PT	F	NSPEC	Non-Degree	Disney
	25	<b>Freshman</b>	<b>PT</b>	<b>M</b>	<b>WHITE</b>	<b>Non-Degree</b>	<b>Disney</b>
	26	Freshman	PT	F	NSPEC	Non-Degree	Disney
	27	Freshman	PT	F	WHITE	Non-Degree	Disney
	28	Senior	PT	F	WHITE	Non-Degree	Disney
	29	Freshman	PT	F	NSPEC	Non-Degree	Disney
*	30	Freshman	PT	F	WHITE	Non-Degree	Disney
	31	Senior	FT	F	BLACK	Finance	Disney
	32	Senior	PT	F	WHITE	Non-Degree	Disney
	33	Senior	PT	F	WHITE	University Studies	Disney
	34	Freshman	PT	M	WHITE	Non-Degree	Disney
	35	Senior	PT	M	BLACK	Non-Degree	Disney
	36	Freshman	PT	F	WHITE	Non-Degree	Disney
	37	Freshman	PT	F	WHITE	Non-Degree	Disney
	38	Freshman	PT	M	NSPEC	Non-Degree	Disney
	39	Senior	FT	M	WHITE	Finance	Disney
*	40	Freshman	PT	M	WHITE	Non-Degree	Disney
	41	Senior	PT	M	WHITE	Non-Degree	Disney
	42	Freshman	PT	F	NSPEC	Non-Degree	Disney
	43	Freshman	PT	F	NSPEC	Non-Degree	Disney
	44	Freshman	PT	F	WHITE	Non-Degree	Disney
	45	Senior	PT	F	WHITE	Human Resource Management	Disney

	46	Freshman	PT	F	NSPEC	Non-Degree	Disney
	47	Freshman	PT	F	WHITE	Non-Degree	Disney
	48	Freshman	PT	F	NSPEC	Non-Degree	Disney
	49	Freshman	PT	F	WHITE	Non-Degree	Disney
*	50	Freshman	PT	F	WHITE	Non-Degree	Disney
	51	Freshman	PT	F	NSPEC	Non-Degree	Disney
	52	Freshman	PT	F	NSPEC	Non-Degree	Disney
	53	Senior	PT	F	WHITE	General Business	Disney
	54	Freshman	PT	F	WHITE	Human Resource Management	Disney
	55	Freshman	PT	F	WHITE	Non-Degree	Disney
	56	Senior	PT	F	WHITE	Non-Degree	Disney
	57	Freshman	PT	F	WHITE	Non-Degree	Disney
	58	Freshman	PT	F	NSPEC	Non-Degree	Disney
	59	Freshman	PT	F	NSPEC	Non-Degree	Disney
*	60	Freshman	PT	M	NSPEC	Non-Degree	Disney
	61	Freshman	PT	F	WHITE	Non-Degree	Disney
	62	Freshman	PT	F	NSPEC	Non-Degree	Disney
*	63	Freshman	PT	F	WHITE	English	Disney
	64	Senior	PT	F	WHITE	Non-Degree	Disney
	65	Freshman	PT	F	NSPEC	Non-Degree	Disney
	66	Senior	PT	F	WHITE	Non-Degree	Disney
	67	Senior	PT	M	WHITE	Non-Degree	Disney
	68	Senior	PT	F	WHITE	Business Administration	Disney
	69	Freshman	PT	M	NSPEC	Non-Degree	Energy
*	70	Freshman	PT	M	WHITE	Non-Degree	Energy
	71	Freshman	PT	M	NSPEC	Non-Degree	Energy



	72	Freshman	PT	M	WHITE	Non-Degree	Energy
	73	Freshman	PT	M	WHITE	Non-Degree	Energy
	74	Freshman	PT	M	WHITE	Non-Degree	Energy
	75	Freshman	PT	M	WHITE	Non-Degree	Energy
	76	Freshman	PT	M	NSPEC	Non-Degree	Energy
	78	Freshman	PT	F	NSPEC	Non-Degree	Energy
	79	Freshman	PT	M	NSPEC	Non-Degree	Energy
	80	Freshman	PT	M	NSPEC	Non-Degree	Energy
*	81	Freshman	PT	F	WHITE	Non-Degree	Energy
	82	Freshman	PT	M	WHITE	Non-Degree	Energy
	83	Senior	PT	F	WHITE	Non-Degree	Energy
	84	Freshman	PT	M	WHITE	Non-Degree	Energy
	85	Freshman	PT	M	NSPEC	Non-Degree	Energy
	86	Senior	PT	F	WHITE	Non-Degree	Energy
	87	Freshman	PT	F	NSPEC	Non-Degree	Energy
	88	Freshman	PT	M	WHITE	Non-Degree	Energy
	89	Freshman	PT	M	WHITE	Non-Degree	Energy
	90	Freshman	PT	M	WHITE	Non-Degree	Energy
*	91	Freshman	PT	F	WHITE	Non-Degree	Energy
	92	Freshman	PT	F	NSPEC	Non-Degree	Energy
	93	Freshman	PT	M	WHITE	Non-Degree	Energy
	94	Freshman	PT	F	WHITE	Non-Degree	Energy
	95	Freshman	PT	M	WHITE	Non-Degree	Energy
	96	Freshman	PT	M	WHITE	Non-Degree	Energy
	97	Freshman	PT	M	WHITE	Non-Degree	Energy
	98	Freshman	PT	M	NSPEC	Non-Degree	Energy
	99	Freshman	PT	M	WHITE	Non-Degree	Energy
	100	Freshman	PT	M	WHITE	Non-Degree	Energy
*	101	Freshman	PT	F	NSPEC	Non-Degree	Energy
	102	Freshman	PT	M	NSPEC	Non-Degree	Energy
	103	Freshman	PT	M	WHITE	Non-Degree	Energy



	104	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	105	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	106	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	107	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	108	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	109	Freshman	PT	M	WHITE	Non-Degree	Hist 399-9
	110	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
*	111	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
	112	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	113	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
	114	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	115	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	116	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	117	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	118	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	119	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	120	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
*	121	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
	122	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
	123	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	124	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	125	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	126	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
	127	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	128	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	129	Freshman	PT	M	NSPEC	Non-Degree	Hist 399-9
	130	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
*	131	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	132	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	133	Freshman	PT	F	NSPEC	Non-Degree	Hist 399-9
	134	Freshman	PT	F	WHITE	Non-Degree	Hist 399-9
	135	Freshman	PT	F	WHITE	Non-Degree	Microsoft
	136	Freshman	PT	F	WHITE	Non-Degree	Microsoft
	137	Freshman	PT	F	NSPEC	Non-Degree	Microsoft
*	138	Freshman	PT	F	NSPEC	Non-Degree	Microsoft
	139	Senior	FT	F	WHITE	Accounting	Quickbooks

	140	Freshman	PT	F	NSPEC	Non-Degree	Quickbooks
*	141	Freshman	PT	F	NSPEC	Non-Degree	Quickbooks
	142	Senior	PT	F	WHITE	Non-Degree	Quickbooks
	143	Freshman	PT	F	WHITE	Non-Degree	Quickbooks
	144	Freshman	PT	M	WHITE	Non-Degree	Quickbooks
	145	Freshman	PT	F	WHITE	Non-Degree	Quickbooks
	146	Freshman	PT	F	NSPEC	Non-Degree	Quickbooks
	147	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	148	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	149	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	150	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
*	151	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	152	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	153	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
	154	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	155	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	156	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
	157	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	158	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	159	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	160	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
*	161	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
	162	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
	163	Freshman	PT	M	NSPEC	Non-Degree	TR Sym
	164	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
	165	Freshman	PT	F	NSPEC	Non-Degree	TR Sym
	166	Freshman	PT	M	NSPEC	Non-Degree	TR Sym

	167	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	168	Freshman	PT	M	NSPEC	Non-Degree	TR-Sym
	169	Freshman	PT	M	NSPEC	Non-Degree	TR-Sym
	170	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
*	171	Freshman	PT	M	NSPEC	Non-Degree	TR-Sym
	172	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	173	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	174	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	175	Freshman	PT	M	NSPEC	Non-Degree	TR-Sym
	176	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	177	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	178	Freshman	PT	F	NSPEC	Non-Degree	TR-Sym
	179	Freshman	PT	M	NSPEC	Non-Degree	TR-Sym
	180	Freshman	PT	M	NSPEC	Non-Degree	TR-Sym