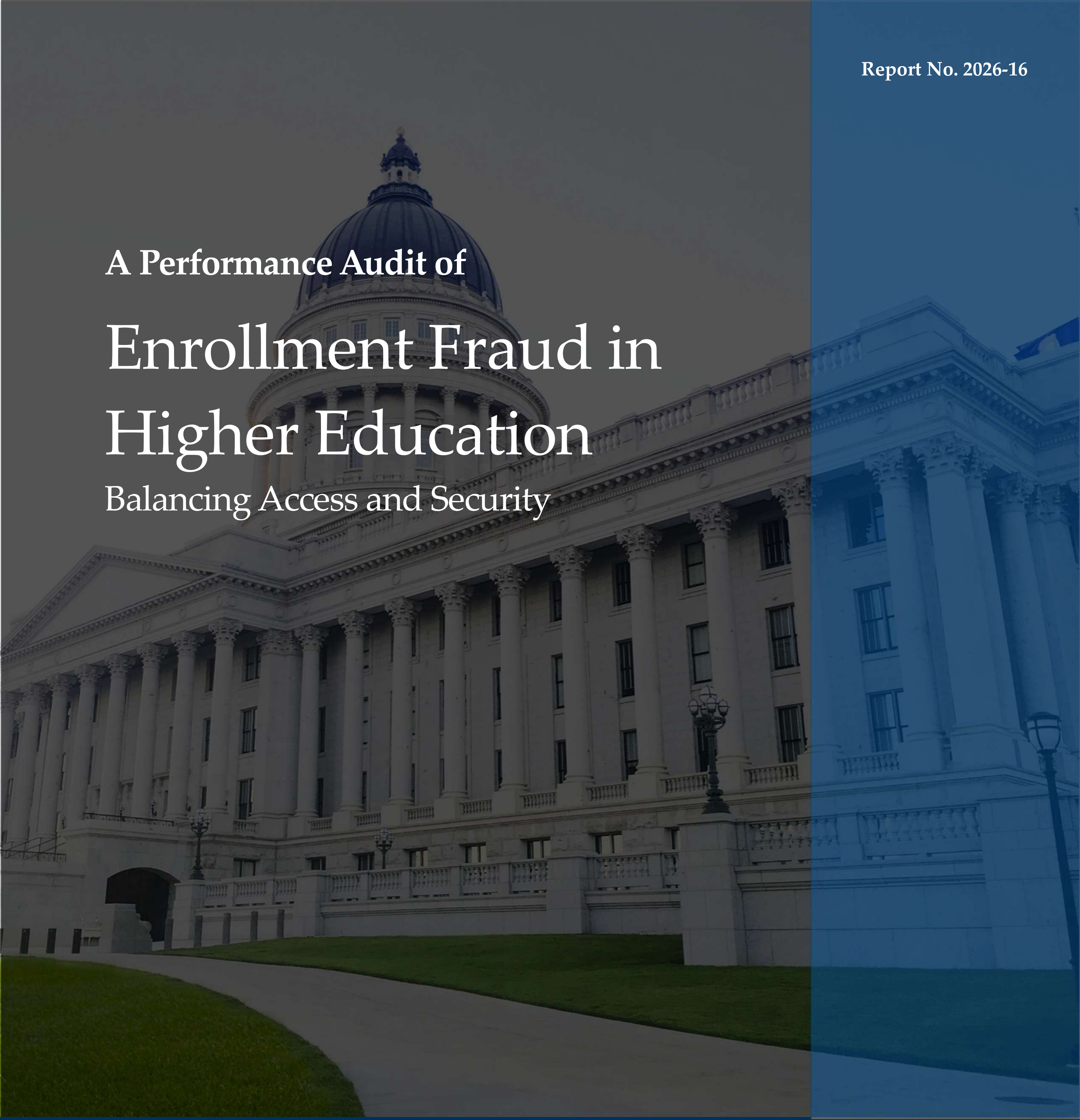
Report No. 2026-16



A Performance Audit of

Enrollment Fraud in Higher Education

Balancing Access and Security

Office of the Legislative Auditor General

Report to the **UTAH LEGISLATURE**

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June 16, 2026

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report:

"A Performance Audit of Enrollment Fraud in Higher Education:
Balancing Access and Security" [Report #2026-16].

An audit summary is found at the front of the report. The scope and objectives of the audit are included in the audit summary.

Utah Code 36-12-15.3(2) requires the Office of the Legislative Auditor General to designate an audited entity's chief officer. Therefore, the designated chief officer for the Utah System of Higher Education is Commissioner Geoff Landward. Commissioner Landward has been notified that they must comply with the audit response and reporting requirements as outlined in this section of ***Utah Code***.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

Kade Minchey

Kade R. Minchey, CIA, CFE

Auditor General

kminchey@le.utah.gov

LEGISLATIVE AUDITOR GENERAL

AUDIT SUMMARY

REPORT 2026-16 | JUNE 2026

Office of the Legislative Auditor General | Kade R. Minchey, Auditor General

PERFORMANCE AUDIT

ENROLLMENT FRAUD IN HIGHER ED: BALANCING ACCESS AND SECURITY

AUDIT REQUEST

Utah Code 36-12-15.4(2)(c) directs the Office of the Legislative Auditor General to establish a list of high-risk programs, operations, and functions within USHE that have capacity for improved efficiency or effectiveness. In working with campuses across the system, our office has identified enrollment fraud as an emerging high-risk area.

BACKGROUND

Enrollment fraud has surged recently in Utah's colleges. Policy changes mean students can more easily access higher education. However, fraudulent actors have taken advantage of these new policies. They have used stolen identities to gain admission to Utah's colleges and steal financial aid money. This report addresses the risks USHE institutions face and solutions they can implement to mitigate enrollment fraud on their campuses.

KEY FINDINGS

- 1.1 USHE Should Establish and Facilitate System Collaboration to Mitigate Fraud Risk
- 1.2 An Imbalance between Access and Security Slowed Institutions' Response to Warning Signs

KEY RECOMMENDATIONS

- **1.1** The Office of the Commisioner of Higher Education, in coordination with institutional leaders, should implement and support an official forum or task force focused on preventing fraud as a system. This group should include relevant stakeholders from all institutions to better understand risk factors and implement effective fraud prevention practices as a system.
- **1.2** The Legislature should consider clarifying ***Utah Code*** to allow institutions within the Utah System of Higher Education to share data on fraudulent applications with appropriate safeguards. This would help institutions promptly alert each other to specific risks.
- **1.5** Institutions within the Utah System of Higher Education should assign clear responsibility to an officer or administrator to proactively lead the institution's efforts to mitigate the evolving threat of enrollment fraud. This will strengthen internal planning and coordination across departments.
- **1.6** Institutions within the Utah System of Higher Education should establish and report key metrics measuring the effect of enrollment fraud such as financial loss, impact on personnel, applicants, and students. This will provide the institution with greater awareness of the scale of fraud risk and effectiveness of risk controls.

REPORT SUMMARY

USHE Should Establish and Facilitate System Collaboration to Mitigate Fraud Risk

A lack of system-wide collaboration within the Utah System of Higher Education limits institutions' ability to prevent and respond to enrollment fraud. Institutions addressed fraud largely in isolation despite facing similar risks, resulting in delayed responses and financial losses.

Siloed fraud-prevention efforts also contributed to operational inefficiencies across institutions. Limited information sharing and the absence of formal system-level response hindered detection of fraudulent activity. The system must pair process improvements with a stronger commitment to collaboration to reduce losses while maintaining student access to higher education.

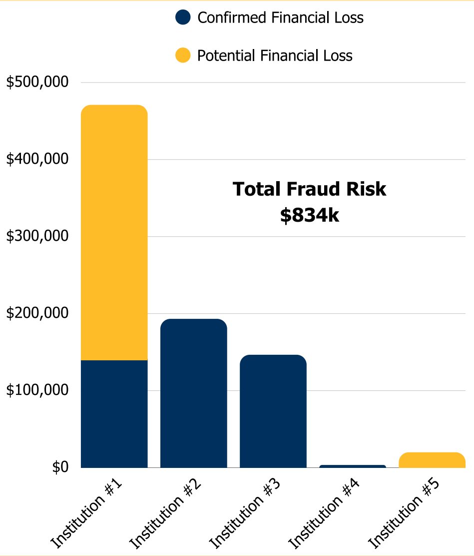
An Imbalance between Access and Security Slowed Institutions' Response to Warning Signs

The surge of enrollment fraud in Utah should have been expected. Factors that contributed to delayed responses include a culture of preserving easy access and a lack of risk awareness.

Unclear accountability further weakened institutions' ability to respond quickly. Individual staff members sometimes recognized fraud risks and raised concerns, but many institutions failed to translate those early warnings into timely actions. Institutions and their leadership must establish clear accountability and performance metrics in order to act more quickly as the threat of enrollment fraud evolves.

USHE Institutions Have Lost Money and Time Because of Fraudulent Applications

Institutions reported disbursing $834k to suspected fraudulent applicants and spending over 15,000 hours working to mitigate enrollment fraud.



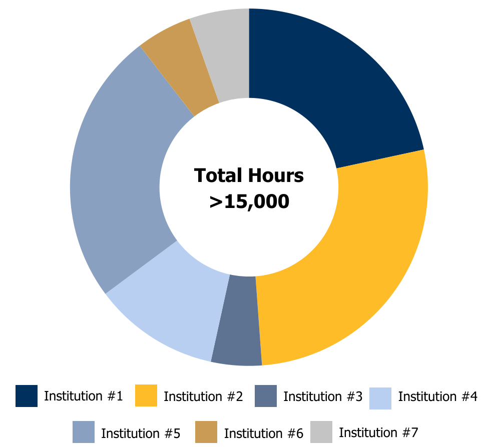


Table of Contents

Introduction 1

Chapter 1 USHE and Its Institutions Must Improve Internal and System Collaboration to Reduce Enrollment Fraud 3

1.1 USHE Should Establish and Facilitate System Collaboration to Mitigate Fraud Risk 3

1.2 An Imbalance between Access and Security Slowed Institutions' Response to Warning Signs 9

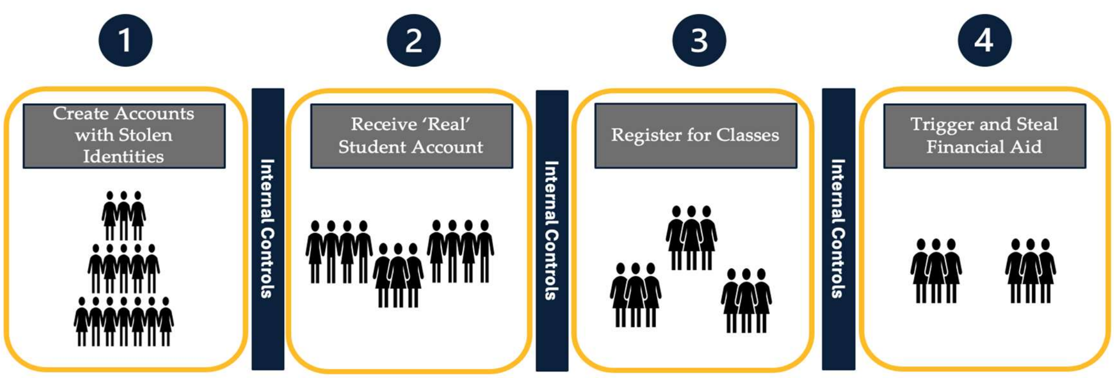
Complete List of Audit Recommendations 13

Agency Response Plan 17

Introduction

Enrollment fraud occurs when people use false or stolen identities to enroll in institutions to obtain financial aid and other resources. These fraudulent applicants are commonly called "ghost students" because they register for classes and often disappear after the institution disburses financial aid. When fraudulent attempts succeed, the colleges are required to pay the federal government back for the loss.

Enrollment fraud increased sharply in 2020 as many programs shifted online and institutions didn't require as many in-person checkpoints. Reported losses and suspected fraudulent applications continued in the years that followed. For example, California's community colleges have estimated a loss of $18 million in aid since 2021 and reported that 31% of their applicants were fraudulent in 2024.[1] In 2025, the Department of Education reported identifying nearly 150,000 fraudulent identities tied to the Free Application for Federal Student Aid (FAFSA) impacting many colleges. Utah is not immune to this issue; institutions in the state have also been targeted by enrollment fraud.



Source: Auditor generated.

Within the application process, fraudsters take advantage of weak points in the system — from applying to enrolling to receiving financial aid. In practice, the process often begins when an individual submits an online application and the institution creates a student record. Once that record exists, it may provide access to the school's online systems and allow the individual to register for courses, which can make the application appear legitimate as it moves forward.

[1] *EdSource*, "How California Community Colleges Are Using AI to Battle Financial Aid Fraud," September 2, 2025.

Separately, the individual completes the FAFSA. If the institution approves enrollment, federal financial aid may be disbursed near the start of the term. When an application is submitted using a fabricated identity, these steps can be manipulated to allow the applicant to progress through the process. These attempts vary in sophistication, ranging from high-volume automated applications to more tailored submissions designed to evade detection.

As institutions respond to rising enrollment fraud, they are implementing new measures and controls to mitigate risk. However, when departments do not communicate emerging risks and effective controls across the institution or the system, gaps remain that ghost students can exploit. The following chapter analyzes the institutional and systemic problems that have enabled ghost students to steal federal financial aid.

Chapter 1
USHE and Its Institutions Must Improve Internal and System Collaboration to Reduce Enrollment Fraud

Institutions did not prepare as a system to implement fraud prevention practices and scrambled to develop reactive solutions when enrollment fraud spiked. These ad hoc and siloed approaches resulted in significant amounts of wasted time and money. The Utah System of Higher Education (USHE, the system) must strengthen coordination to address the common problem of enrollment fraud.

In recent years, enrollment fraud has spread across the nation and presents a challenge for nearly all USHE degree-granting institutions. Institutions report that fraudsters exploit weak controls within admissions systems, enabling them to apply, enroll, and receive financial aid. As USHE increased access to higher education, it also exposed institutions to more fraudulent activity. From 2025 to 2026, USHE institutions reported they may have lost more than $830,000 to fraudulent applicants, and university staff estimated they spent more than 15,000 hours trying to mitigate enrollment fraud. Institutions must proactively plan, consistently coordinate, and take decisive, strategic action to effectively mitigate enrollment fraud.

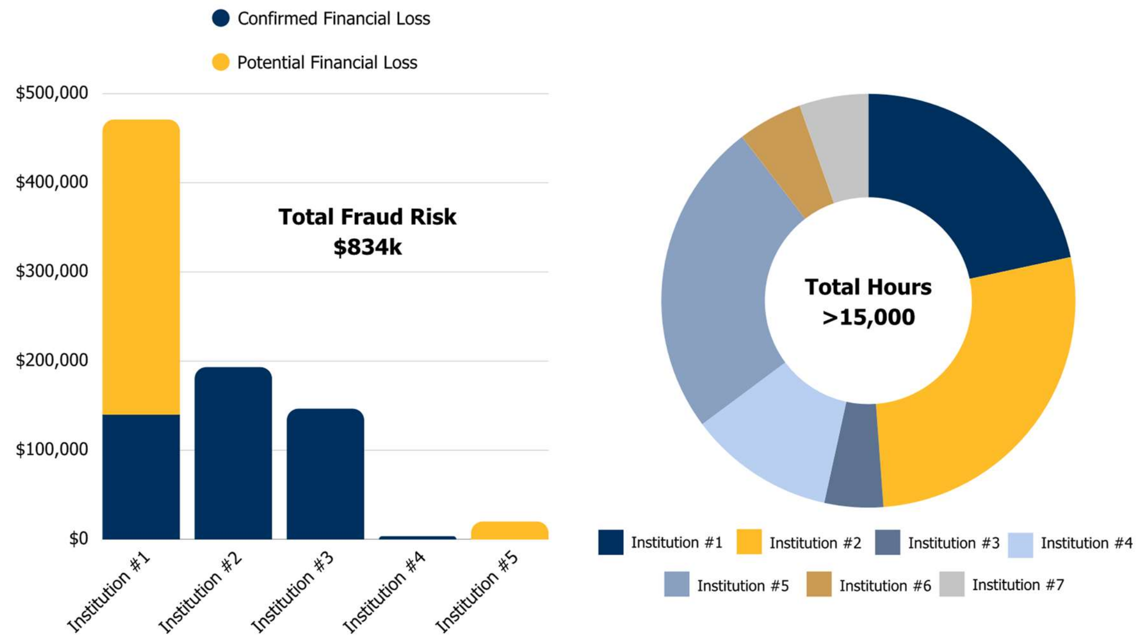
1.1 USHE Should Establish and Facilitate System Collaboration to Mitigate Fraud Risk

USHE institutions were unprepared for a recent surge in enrollment fraud. Salt Lake Community College (SLCC) received about 2,000 fraudulent applications in the last five years. Since 2025, six other USHE institutions received an estimated 4,500 fraudulent applications. Institutions must coordinate their response to enrollment fraud because it continues to evolve.

Institutions May Have Lost More than $830k to Fraudulent Applicants Despite Implementing Fraud Detection Systems

The effect of fraudulent applications varies among institutions. The largest financial losses were concentrated in three universities. Additionally, enrollment fraud consumed employee time, delayed application response timelines, and slowed student progress. The following chart summarizes the financial effect of fraudulent applicants across the system:

Figure 1.1 USHE Institutions May Have Lost $834k to Fraudulent Applicants, and Employees Spent over 15,000 Hours Mitigating Fraud. This figure shows financial loss and hours spent on mitigating enrollment fraud from 2025 to 2026.[2] Three institutions reported no financial losses. Institutions that disbursed aid to fraudulent accounts must repay the federal government for the loss.



Source: Auditor generated.

Along with institutions' financial loss, staff estimated they spent more than 15,000 hours addressing enrollment fraud. Multiple institutions now take longer to respond to real student applications because of the volume of fraudulent attempts.

Staff spent more than 15,000 hours addressing enrollment fraud. This resulted in delayed response times to applications for real applicants.

In addition to the wasted staff hours, academic advisors and professors must spend time identifying and reporting ghost students. These new responsibilities take away resources from real students' needs. For example, fraudulent applicants scheduled required meetings with academic advisors at Weber State University, delaying real students' ability to meet with advisors and register for required courses. At Utah Valley University, fraudulent applicants enrolled for required classes, thus placing real students on waitlists.

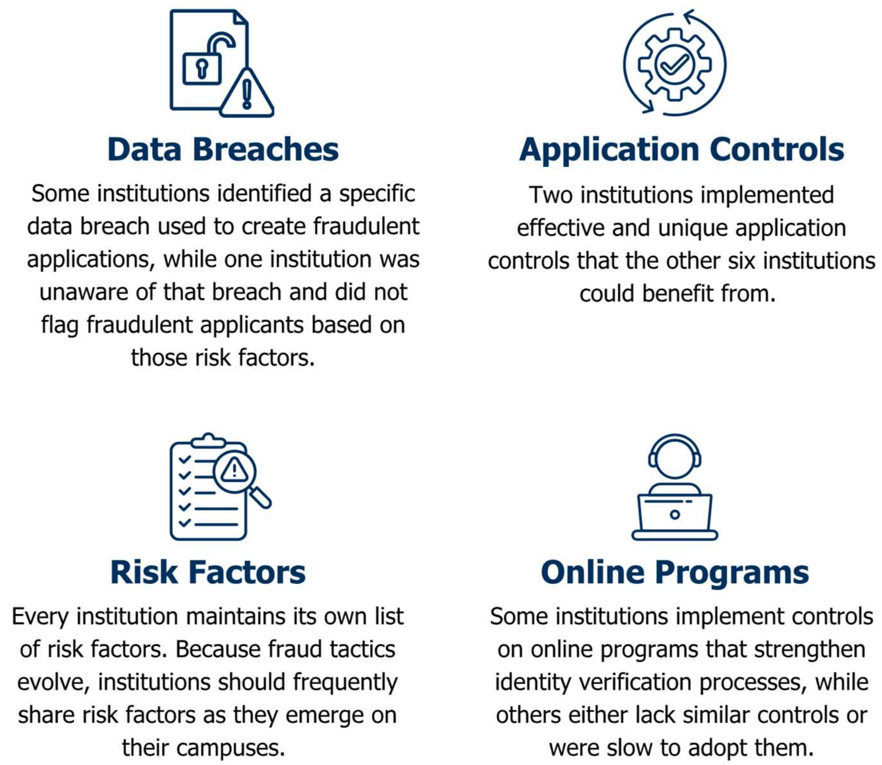
The lack of system-wide collaboration resulted in siloed and inconsistently applied fraud prevention practices within USHE. Currently, there is no formal approach to addressing enrollment fraud as a system. USHE and its institutions

[2] The chart reflects the amount of confirmed and potential fraud. However, there may be additional undetected loss.

must strengthen cross-institutional collaboration and communication to more effectively address enrollment fraud. Further alignment can prevent enrollment fraud through 1) a formalized working group, 2) clarified legislation on data sharing within the system, and 3) sufficient collaboration with institutions and local education agencies on direct admission.

The System Does Not Share Specific Risks and Best Practices

Institutions could have mitigated enrollment fraud earlier and more effectively by sharing risks and effective solutions across the system. Key gaps in best practices include the following:



Source: Auditor generated.

Other state systems utilize cross-institutional collaboration. For example, the Minnesota Legislature enacted statute in 2025 requiring an enrollment fraud work group to develop policies and procedures to prevent fraudulent applicants in online courses. This work group includes administrative, faculty, and student representatives from across the state. The work group reported to the legislature and recommended required reports on key metrics evaluating enrollment fraud trends. This formalized working group ensures all institutions are aware of solutions to enrollment fraud and strengthens oversight and accountability across Minnesota's higher education system.

USHE and its institutions must improve system-wide collaboration and coordination so that all institutions are aware of the same risk factors and implement effective controls. To support system-wide collaboration, the Office of the Commissioner of Higher Education (OCHE), partnering with USHE institutions and their leaders, should coordinate formalized approaches to mitigate enrollment fraud and strengthen oversight, accountability, and system alignment.

RECOMMENDATION 1.1

The Office of the Commissioner of Higher Education, in coordination with institutional leaders, should implement and support an official forum or task force focused on preventing fraud as a system. This group should include relevant stakeholders from all institutions to better understand risk factors and implement effective fraud prevention practices as a system.

Data Sharing within USHE Can Improve Fraud Prevention Practices

Staff at multiple institutions were concerned that the same stolen identities were being used at several schools. However, they were hesitant to alert other USHE institutions due to data privacy limitations.

We compared fraudulent applicants from different USHE institutions to determine if the same stolen identities were used. Across five USHE institutions, we found instances where stolen identities were used multiple times. These results indicate that stronger system-wide data sharing could improve early detection of fraudulent applicants and reduce enrollment fraud.

Currently, Utah's Government Records Access and Management Act limits the sharing of private information among institutions. The Legislature could create exceptions in statute, allowing USHE institutions to share data on fraudulent applicants and quickly and consistently alert all institutions in the system. Other government agencies have addressed similar challenges through appropriate data sharing.[3]

To better support system-wide fraud prevention, the Legislature could clarify when USHE institutions may share information on fraudulent applicants while preserving privacy protections. This could lead to earlier detection of fraud and ensure consistent and efficient solutions across institutions.

RECOMMENDATION 1.2

The Legislature should consider clarifying ***Utah Code*** to allow institutions within the Utah System of Higher Education to share data on fraudulent applications with appropriate safeguards. This would help institutions promptly alert each other to specific risks.

USHE Should Balance Access and Security While Considering Application Options

Another aspect of enrollment fraud shows a gap between the degree-granting institutions and system-level leadership. In 2023, the Board of Higher Education (the Board) removed application fees for in-state applicants to promote access to higher education. However, some admissions directors reported they asked for fees to remain in place because the fee served as a deterrent to fraud. Greater collaboration between system leaders and USHE institutions on application fees could have improved support for both access and security.

Other states, like California, considered reinstating application fees after experiencing influxes of fraud. Given the surge of enrollment fraud that followed Utah's fee removal, similar consideration is warranted here, particularly for online programs and courses. We recognize that access to higher education is important, and the Board supported it by eliminating application fees. Moving forward, the Board should continue to balance access and fraud prevention. Below are some options the Board may consider. There may be other options not listed here that USHE may also want to consider.

[3] Utah's Health Data Authority Act allows the Department of Health and Human Services to collect and analyze health data from health agencies while protecting individual privacy. Additionally, California's community colleges partnered with its Department of Motor Vehicles to more effectively verify student identities and reduce fraudulent applicants.

Menu of Options

Option	Purpose
Application Fee for Online Programs	Discourages high-volume fraudulent applications and preserves access for in-person programs
Enrollment Deposit	Confirms student intent and reduces fraudulent applications

RECOMMENDATION 1.3

The Utah System of Higher Education should consider a menu of options to strengthen security during the application process against enrollment fraud. Doing so will continue to provide access to higher education while mitigating enrollment fraud.

Direct Admission Can Reduce Fraud Risk, but Significant Process Gaps Must Be Addressed

Consistent with ***Utah Code,*** USHE piloted a program in 2025 that could reduce fraud risk. The program, known as Admit Utah, involved seniors from Provo School District. The 272 participants used a website to apply to any state institution of higher education. The partnership with Provo School District allowed USHE to verify applicant identities through a data-matching process that can prevent fraudulent attempts to receive aid.

However, the handoff between Admit Utah and USHE schools revealed important gaps in the process. College admissions directors were frustrated that the applications lacked necessary information. For example, the pilot did not provide student ID numbers that would allow the institutions to retrieve high school transcripts. Admissions staff engaged in time-consuming efforts to gather the necessary information. In many cases, the applications initiated through the pilot remained incomplete from the institutions' perspective.[4]

[4] The Utah State Board of Education's policy and guidance influenced data decisions and practices for the Admit Utah pilot.

The disconnect stemmed from USHE's emphasis on access—an emphasis that simplified the experience for prospective students but resulted in a difficult process for the institutions. As the Admit Utah application expands statewide, improving the handoff to institutions is necessary to realize the potential fraud reduction benefits.

RECOMMENDATION 1.4

The Utah System of Higher Education should validate the Admit Utah application with college admissions directors to balance the pursuit of access with effective process. This will reduce fraud risk and lower the burden imposed on institutions as the program scales.

1.2 An Imbalance between Access and Security Slowed Institutions' Response to Warning Signs

The surge of enrollment fraud in Utah should have been expected. In some cases, individual employees tried to proactively prepare their institutions ahead of time. However, most institutions reacted once the problem surfaced in their admissions systems. Factors that contributed to delayed preparation include a culture of preserving easy access, lack of risk awareness, and fragmented accountability across departments. Designating ownership of the risk and establishing key performance indicators will strengthen institutions' ability to act more quickly as the threat evolves.

Some USHE Institutions Were Slow to React to Warning Signs on Enrollment Fraud

Warning signs signaled that a surge in enrollment fraud was approaching. Other states reported a rise in enrollment fraud, resulting in significant financial loss. Within Utah, SLCC experienced a spike in fraudulent attempts after waiving its application fee. SLCC proactively warned other USHE institutions about enrollment fraud spiking when access increased. The following chart summarizes key events chronicling the rise in enrollment fraud:

Source: Auditor generated.

In response, states like California and Minnesota developed coordinated approaches and accountability measures to address enrollment fraud. These examples of enrollment fraud should have signaled to USHE institutions to implement fraud prevention solutions before fraud surged more broadly in Utah. However, most institutions reacted when the problem arrived rather than proactively preparing.

USHE Institutions Created Imbalance between Access and Security

USHE institutions expanded access to higher education through online degree programs, but not all institutions added sufficient security processes to screen online applicants.

In some cases, individual employees anticipated increased fraud risk, but the institution was slow to act. The slow response stems from a strong culture of providing easy access to higher education. In some instances, institutions underestimated fraud risks or viewed them as unlikely to affect their own institution. Additionally, we found that university leadership and employees in critical positions were sometimes unaware of the depth of fraud at their institutions.

Source: Auditor generated.

As a result, individual institutions' responses varied in effectiveness. For example, Southern Utah University (SUU) uses a dynamic in-house fraud detection system that identified over 1,500 fraudulent accounts. However, the fraud detection system was developed and refined after financial losses occurred. These losses are concentrated in SUU's online programs such as Speedway.

In contrast, Utah State University was targeted by 700 fraudulent applicants in one weekend. Employees immediately notified leadership and temporarily shut down the application portal until they implemented stronger controls. Senior leadership supported additional system controls that prevented financial loss and effectively blocked future fraudulent attempts.

These examples highlight the need for strong oversight, accountability, and measurement of enrollment fraud.

System and Institutional Leadership Need to Balance Access with Security as Enrollment Fraud Evolves

Enrollment fraud poses a rapidly evolving threat to higher education. Institutions reported that fraudulent applicants use artificial intelligence to adapt to new controls that institutions implement. Institutions need to proactively plan and consistently coordinate fraud mitigation while maintaining access for students. When institutions act decisively and strategize effective fraud prevention solutions, they can reduce fraud. Institutions and their leadership must implement effective security solutions and properly coordinate these efforts.

RECOMMENDATION 1.5

Institutions within the Utah System of Higher Education should assign clear responsibility to an officer or administrator to proactively lead the institution's efforts to mitigate the evolving threat of enrollment fraud. This will strengthen internal planning and coordination across departments.

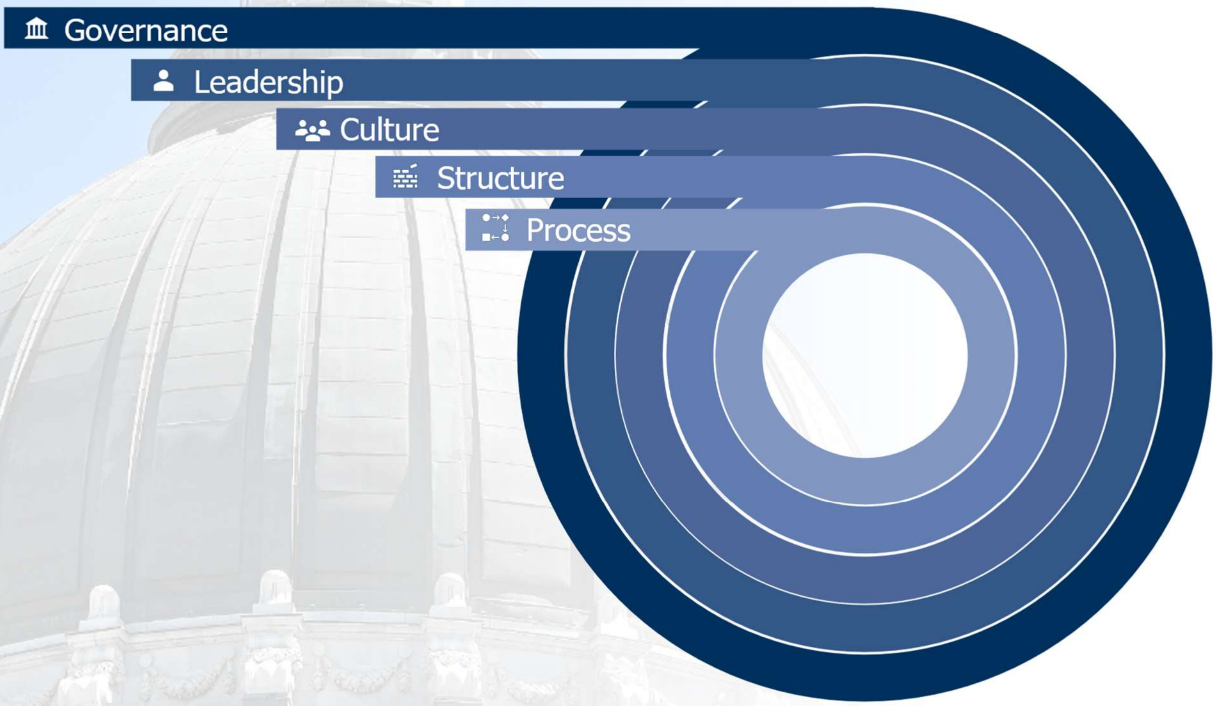
RECOMMENDATION 1.6

Institutions within the Utah System of Higher Education should establish and report key metrics measuring the effect of enrollment fraud such as financial loss, impact on personnel, applicants, and students. This will provide the institution with greater awareness of the scale of fraud risk and effectiveness of risk controls.

Complete List of Audit Recommendations

THE FIVE LAYERS OF CAUSE

We developed the Five Layers of Cause Framework to assist leaders in identifying the causes of organizational success and failure. To truly improve as an organization, leaders must understand the causes of major risks. Only when leaders understand these causes and their roots can they make meaningful improvements. Root causes are deeper and more fundamental.



The five layers of cause are defined below. They are ranked from most impactful in organizational change to least. The next page identifies the layer of cause in each recommendation.

GOVERNANCE

The laws and rules that establish the organization's mission, accountability, and funding. Governance empowers the organization with the leadership and resources needed to achieve meaningful results.

LEADERSHIP

The competency and character of the leaders of the organization. Leadership is the decisive force that transforms vision into action and effort into results.

CULTURE

The collective beliefs, values, and behaviors of the organization. An organization's culture can determine employee engagement and morale, willingness to innovate, and quality of product.

STRUCTURE

The policies and standards that guide an organization's work. Structures direct the flow of work and establish what is and is not acceptable.

PROCESS

The steps taken to accomplish a task. Processes are the logistics—the capital, workflows, timing, and practices—that move work along.

Complete List of Audit Recommendations

This report made the following six recommendations. The numbering convention assigned to each recommendation consists of its chapter followed by a period and recommendation number within that chapter.

Recommendation 1.1 (Governance)

The Office of the Commissioner of Higher Education, in coordination with institutional leaders, should implement and support an official forum or task force focused on preventing fraud as a system. This group should include relevant stakeholders from all institutions to better understand risk factors and implement effective fraud prevention practices as a system.

Recommendation 1.2 (Structure)

The Legislature should consider clarifying ***Utah Code*** to allow institutions within the Utah System of Higher Education to share data on fraudulent applications with appropriate safeguards. This would help institutions promptly alert each other to specific risks.

Recommendation 1.3 (Structure)

The Utah System of Higher Education should consider a menu of options to strengthen security during the application process against enrollment fraud. Doing so will continue to provide access to higher education while mitigating enrollment fraud.

Recommendation 1.4 (Process)

The Utah System of Higher Education should validate the Admit Utah application with college admissions directors to balance the pursuit of access with effective process. This will reduce fraud risk and lower the burden imposed on institutions as the program scales.

Recommendation 1.5 (Leadership)

Institutions within the Utah System of Higher Education should assign clear responsibility to an officer or administrator to proactively lead the institution's efforts to mitigate the evolving threat of enrollment fraud. This will strengthen internal planning and coordination across departments.

Recommendation 1.6 (Process)

Institutions within the Utah System of Higher Education should establish and report key metrics measuring the effect of enrollment fraud such as financial loss, impact on personnel, applicants, and students. This will provide the institution with greater awareness of the scale of fraud risk and effectiveness of risk controls.

Agency Response Plan

June 5, 2026

Kade R. Minchey, CIA, CFE, Auditor General
Office of the Legislative Auditor General
Utah State Capitol Complex
Rebecca Lockhart House Building, Suite W315
PO Box 145315
Salt Lake City, UT 84114-5315

Dear Mr. Minchey,

Thank you for the opportunity to review the exposure draft of "*A Performance Audit of Enrollment Fraud in Higher Education: Balancing Access and Security*" (2026-16). We appreciate the audit team's work and the collaborative approach taken throughout this process.

We acknowledge that enrollment fraud in admissions and financial aid is a growing national issue affecting institutions across the country. As the draft reflects, Utah's institutions are not unique in facing increasingly sophisticated and high-volume fraudulent activity, particularly as access has expanded and application processes have evolved.

The Office of the Commissioner of Higher Education is committed to working as a system and in close partnership with our institutions to mitigate and prevent enrollment fraud. We agree that stronger coordination, clearer accountability, and shared learning across institutions will be critical as this threat continues to evolve. We view the audit's recommendations as an important opportunity to strengthen systemwide collaboration while continuing to balance access to higher education with appropriate safeguards.

We appreciate the audit team's engagement and look forward to continued collaboration as we finalize our response and move toward implementation.

Thank you,

Commissioner Geoff Landward

Recommendation 1.1 (Governance): The Office of the Commissioner of Higher Education, in coordination with institutional leaders, should implement and support an official forum or task force focused on

preventing fraud as a system. This group should include relevant stakeholders from all institutions to better understand risk factors and implement effective fraud prevention practices as a system.

Department Response 1.1: OCHE & institutions concur

1. **Who:** Office of the Commissioner of Higher Education (OCHE), Taylor Adams, taylor.adams@ushe.edu
2. **What:** OCHE will partner with USHE institutions to implement a fraud prevention task force focused on preventing and mitigating fraud as a system and within institutions.
3. **How:** OCHE will provide administrative and staffing support to assemble a task force with relevant stakeholders from all institutions. This will include admissions, financial aid, registrar, general counsel, and data personnel.
4. **Documentation:** Calendar appointments, meeting notes, and action items will validate the implementation status of the task force.
5. **Timetable:** OCHE will convene the inaugural meeting by September 2026 and intends to hold one additional meeting in 2026 with quarterly meetings in 2027. Additional meetings will be scheduled as needed.
6. **When:** Task force implemented by September 2026.

Recommendation 1.2 (Structure)
The Legislature should consider clarifying Utah Code to allow institutions within the Utah System of Higher Education to share data on fraudulent applications with appropriate safeguards. This would help institutions promptly alert each other to specific risks.

Department Response 1.2:

The Office of the Commissioner of Higher Education, in collaboration with institutions, welcomes the opportunity to work with the Legislature to update provisions of Utah Code to allow institutions within the Utah System of Higher Education to share data on fraudulent applications with appropriate safeguards as recommended by the audit.

Recommendation 1.3 (Structure)
The Utah System of Higher Education should consider a menu of options to strengthen security during the application process against enrollment fraud. Doing so will continue to provide access to higher education while mitigating enrollment fraud.

Department Response 1.3: OCHE & institutions concur

1. **Who:** Office of the Commissioner of Higher Education (OCHE), Taylor Adams, taylor.adams@ushe.edu
2. **What:** OCHE will convene the fraud prevention task force to review options to strengthen security during the application process.
3. **How:** OCHE will email institutional contacts and provide administrative support in notetaking and scheduling to convene the fraud prevention task force. OCHE will

ensure the agenda reflects the recommendation to review options to strengthen security during the application process and may provide recommendations to the system and institution.

4. **Documentation:** Calendar appointments, meeting notes, and action items will validate the implementation status of this recommendation.
5. **Timetable:** OCHE will convene the inaugural meeting by September 2026 and intends to hold one additional meeting in 2026 with quarterly meetings in 2027. Additional meetings will be scheduled as needed.
6. **When:** Initial options to strengthen security will be discussed in 2026 meetings and related recommendations may be provided to OCHE and institutions as deemed necessary by the task force.

Recommendation 1.4: The Utah System of Higher Education should validate the Admit Utah application with college admissions directors to balance the pursuit of access with effective process. This will reduce fraud risk and lower the burden imposed on institutions as the program scales.

Department Response 1.4: OCHE concurs

1. **Who:** Office of the Commissioner of Higher Education (OCHE), Taylor Adams, taylor.adams@ushe.edu
2. **What:** OCHE will collaborate with institutions, including admissions directors and presidents, to determine effective processes for future iterations of Admit Utah.
3. **How:** OCHE will coordinate with institutions through scheduled meetings and/or electronic correspondence to gather input on desired student data, informing process development for future iterations of Admit Utah.
4. **Documentation:** Calendar appointments, meeting notes, emails, and/or meeting action items will validate the implementation status of this recommendation.
5. **Timetable:** Process gaps will be identified by September 2026 and addressed in the development of future versions of Admit Utah and direct admissions initiatives.
6. **When:** Process gaps will be identified by September 2026 and addressed in the development of future versions of Admit Utah and direct admissions initiatives.

Recommendation 1.5 (Leadership): Institutions within the Utah System of Higher Education should assign clear responsibility to an officer or administrator to proactively lead the institution's efforts to mitigate the evolving threat of enrollment fraud. This will strengthen internal planning and coordination across departments.

Department Response 1.5: OCHE & institutions concur

1. **Who:** Office of the Commissioner of Higher Education (OCHE), Taylor Adams, taylor.adams@ushe.edu, in partnership with institutional presidents, who are responsible for the identification of an institutional officer or administrator.
2. **What:** Institutions will assign clear responsibility to an officer or administrator to lead institutional efforts to mitigate and prevent fraud.
3. **How:** OCHE will request that institutions designate an institutional leader, via email correspondence, to support efforts to mitigate and prevent fraud.
4. **Documentation:** This information will be collected by OCHE.

5. **Timetable:** OCHE will reach out to institutions by June 30, 2026, to solicit a list of institutionally assigned leaders.
6. **When:** Institutions will respond to OCHE by July 15, 2026.

Recommendation 1.6 (Process): Institutions within the Utah System of Higher Education should establish and report key metrics measuring the effect of enrollment fraud such as financial loss, impact on personnel, applicants, and students. This will provide the institution with greater awareness of the scale of fraud risk and effectiveness of risk controls.

Department Response 1.6: OCHE & institutions concur
1. **Who:** OCHE will collect a list of points of contact from the institutions and provide that list to OLAG for future updates related to the audit.
2. **What:** Institutions will establish and report key metrics measuring the effect of enrollment fraud such as financial loss, impact on personnel, applicants, and students.
3. **How:** The institution(s) will meet with key internal stakeholders and receive input from the fraud prevention task force related to developing metrics.
4. **Documentation:** Institutional documentation and emails from fraud prevention task force will validate the implementation status of this recommendation.
5. **Timetable:** Metrics will be discussed at the first fraud prevention task force meeting and reported to the fraud prevention task force by the second meeting.
6. **When:** Institutions will establish and report initial metrics by December 2026.

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