University System of Georgia
Internal Auditors Meeting

Program Compliance Overview and Audit Issues/Findings
Presented by:
Cassandra Weems
Institutional Improvement Specialist

August 1, 2012
School Participation Divisions

Updated 05/13/11

Department’s Typical Regional Boundaries

Also: Guam, Micronesia, American Samoa, Marshall Islands, etc.

Also: Puerto Rico, VI
## Program Compliance: School Eligibility Service Group

Robin Minor –  Chief Compliance Officer, Washington DC, (202) 377-3717  
Ron Bennett – Director, School Eligibility Service Group (SESG), (202) 377-3818

<table>
<thead>
<tr>
<th>School Participation Division – Northeast</th>
<th>School Participation Division-South Central</th>
<th>School Participation Division – Northwest</th>
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<tbody>
<tr>
<td><strong>New York/Boston</strong> (CT, Maine, Mass., NH, RI Vermont, NJ, NY, Puerto Rico, Virgin Islands)</td>
<td><strong>Atlanta</strong> (Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina)</td>
<td><strong>Chicago/Denver</strong> (Illinois, MN, Ohio, Wisconsin, IN Colorado, Michigan, Montana, North Dakota, South Dakota, Utah, Wyoming)</td>
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<td>Philadelphia (DC, Delaware, Maryland, Pennsylvania, Virginia, West Virginia)</td>
<td><strong>Dallas</strong> (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)</td>
<td><strong>San Francisco/Seattle</strong> (American Samoa, Arizona, California, Guam, Hawaii, Nevada, Palau, Marshall Islands, N. Marianas State of Micronesia, Alaska, Idaho, Oregon, Wash.)</td>
</tr>
<tr>
<td><strong>Clery:</strong>  Jim Moore - (215) 656-6495</td>
<td>Ralph LoBosco-Kansas City (816) 268-0440  Dvak Corwin – Kansas City (816) 268-0420  Phillip Brumback-Wash DC (202) 377-3464</td>
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<td><strong>Foreign Schools</strong></td>
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<tr>
<td>Barbara Hemelt - Wash DC (202) 377-4201  Joseph Smith-Wash DC (202) 377-4321</td>
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</table>
Program Compliance Business Functions

• Compliance Audits
• Program Reviews
• Eligibility Actions
• Method of Payments
• Financial Analysis
• Institutional Improvement Services
• Compliant Resolution
Audit Findings
Top Audit Findings

- Repeat Finding – Failure to take corrective action
- Return To Title IV (R2T4) calculation errors
- R2T4 funds made late/not made
- Student Status – Inaccurate/Untimely reporting
- Pell Grant Overpayment/Underpayment
- Satisfactory Academic Progress
Top Audit Findings

- Student credit balance deficiencies
- Entrance/Exit counseling deficiencies
- Verification violations
- Qualified auditor’s opinion cited in audit
- Improper certification of Stafford Loan
Repeat Finding - Failure To Take Corrective Action

- Failure to implement Corrective Action Plan (CAP)
- CAP did not remedy the occurrences of instances of noncompliance
- Internal controls not effective to ensure compliance with FSA guidelines

*Regulations: 34 C.F.R. §§ 668.16 and 668.174*
R2T4 Calculation Errors

- Ineligible funds as aid that ‘could have been disbursed’
- Improper treatment of overpayments
- Incorrect withdrawal date
- Mathematical and/or rounding errors

Regulation: 34 C.F.R. § 668.22(e)
Return of Title IV Funds Made Late

• School’s policy and procedures not followed
• Returns not made within allowable timeframe (45 days)
• Inadequate system in place to identify/track official and unofficial withdrawals
• No system in place to track number of days remaining to return funds

Regulation: 34 C.F.R. § 668.22(j)
Student Status – Inaccurate/Untimely Reported

• Roster File (formerly called Student Status Confirmation Report [SSCR]) not submitted timely
• Failure to provide notification of last date of attendance/changes in student enrollment status
• Conflicting status change types and dates

Regulation: 34 C.F.R. §685.309(b)
Pell Grant
Overpayment/Underpayment

• Incorrect Pell Grant formula
• Inaccurate calculations
  – Proration
  – Incorrect EFC
  – Adjustments between terms
  – Incorrect number of weeks/hours

Regulations: 34 C.F.R. §§ 690.62; 690.63; 690.75 & 690.80
Satisfactory Academic Progress (SAP)

• Satisfactory Academic Progress not adequately monitored
• Satisfactory Academic Progress policy not developed/followed
• Failure to account for course hours in attempted hours
Student Credit Balance Deficiencies

• Credit balance not released to student within 14 days
• No process in place to determine when a credit balance has been created
• Non-compliant authorization to hold Title IV credit balances

Regulations: 34 C.F.R. §668.164(e); 668.165(b)
Entrance/Exit Counseling Deficiencies

- Entrance counseling not conducted/documentated for first-time borrowers
- Exit counseling not conducted/documentated for withdrawn students or graduates
- Exit counseling materials not mailed to students who failed to complete counseling

Regulation: 34 C.F.R. § 685.304
Verification Violations

- Verification worksheet missing/incomplete
- Income tax returns missing/not signed
- Conflicting data not resolved
- Untaxed income not verified
- Corrections that exceed tolerance/not submitted

Regulations: 34 C.F.R. §§ 668.51-668.61
Auditor’s Opinion Cited in Audit (Qualified or Adverse)

- Anything other than an unqualified opinion
- Serious deficiencies/areas of concern in the compliance audit/financial statements
  - R2T4 violations
  - Inadequate accounting systems and/or procedures
  - Lack of internal controls

*Regulation: 34 C.F.R. §668.171(d)*
Improper Certification of Stafford Loans

• Incorrect annual loan amount based on grade level, dependency status, or annual limits
• Failure to prorate loans when necessary
• Half-time enrollment not verified

Regulation: 34 C.F.R. § 685.201 and 203
Some Compliance Solutions

• Assessment of entire process
  – Design an institution-wide plan of action
    • Adequate and qualified staff
    • Appropriate internal controls
    • Training
      – FSA COACH
      – FSA Assessments
      – FSA Online and In-Person trainings
• Implement appropriate Compliance Audit Process timely and effectively.
Questions???

Contact Information
Cassandra.weems@ed.gov
(404) 974-9305
Laura.hall@ed.gov
(404) 974-9293
IFAP
(ifap.ed.gov)

• Resource Center for all of ED’s Guidance related to administering the Title IV programs

• Register with “My IFAP”
  – Upper left hand corner
  – Receive and modify automatic data updates (changes, new guidance, corrections, manuals, etc.)
Budget Control Act of 2011
(BCA)
BCA - Subsidized Loans

- Elimination of Subsidized Loans for Graduate Students
  - Effective for loans made for loan periods beginning on or after July 1, 2012.
  - Subsidized Loans for loan periods beginning before July 1, 2012 remain unchanged.
  - COD will edit for compliance

- Annual limits unchanged, all unsubsidized ($20,500)
- Students still eligible for subsidized loans for preparatory coursework and teacher certification programs
Elimination of Direct Loan Incentives

- Terminates repayment incentives ("upfront rebate") to encourage on-time repayment of loans
- Effective for loans first disbursed on or after July 1, 2012
  - COD will edit for compliance
  - An actual disbursement takes precedence over an anticipated disbursement
- Still allows interest rate reduction to borrowers who repay electronically
Consolidated Appropriations Act 2012

GEN-12-01
2012-2013 Pell Grant Amounts

- 2012-2013 Pell maximum award - $5,550
- Maximum Pell eligible EFC is 4995
  - Eliminates eligibility of a student who was eligible for between five and ten percent of maximum award.
- 2012-2013 payment schedules posted IFAP on January 12, 2012 (P-12-01)
Auto-Zero EFC Income Threshold

- Reduces the income threshold for an automatic zero expected family contribution (EFC) to $23,000
  - For the 2012-2013 award year was scheduled to be $32,000.

- **FAFSA on the Web** and CPS have been updated, and both began 2012-2013 FAFSA processing using $23,000 as the auto-zero EFC threshold.
Pell Grant Duration of Eligibility

- Reduces the duration of a student’s eligibility to receive Pell Grant from 18 semesters (900%) to 12 semesters (600%)
- Applies to all students effective with the 2012-13 award year.
- Calculation includes all earlier years of the student’s receipt of Pell
  - NO “grandfather” clause
Pell Grant Duration of Eligibility

- Calculate the equivalency by adding together each of the annual percentages of a student’s scheduled award that was actually disbursed to the student.
  - LEU – Lifetime Eligibility Used
  - Once LEU reaches 600%, student no longer eligible *for Pell*
  - If LEU more than 500% but less than 600%, partial eligibility for next award year.
Pell Grant Duration of Eligibility

Electronic Announcement posted on February 17, April 6, June 29

- Beginning in July 2012 –
  - NSLDS will display student’s LEU
  - CPS will use comment codes on ISIRs/SARs to flag students LEU is almost/exceeds 600%.
- New COD Pell LEU History page
  - COD is the system of record for LEUs
- If report a disbursement but don’t disburse or don’t disburse in full, MUST adjust (more important now than ever due to the 600% limit)
  - Report adjustments within 30 days
Ability-to-Benefit (ATB)

- Eliminates Title IV eligibility for students without a high school diploma (or equivalent)
- Recognized equivalent of a HSD includes:
  - GED
  - State certificate passing State authorized exam
    State considers same as HSD
  - Academic transcript of successful completion of at least a 2-year program acceptable for full credit toward a Bachelor’s degree
  - Excelled academically in high school and meets admission policy into at least an AA degree
  - Home schooled students
Ability-to-Benefit (ATB) – Exception

- Students who attended a Title IV eligible program of study prior to July 1, 2012 OR officially registered for a Title IV eligible program prior to July 1, 2012 AND later attended that program may continue to qualify under one of the ATB alternatives –
  - Passing an independently administered, approved ATB test
  - Successfully completing at least six credit hours or 225 clock hours
Ability-to-Benefit (ATB)

- Students do not have to have received Title IV aid prior to July 1, 2012 to qualify for the ATB exceptions.
- School must document student qualifies for use of ATB alternative.
  - NSLDS, transcripts, other documentation from previous school indicating enrollment in eligible program.
- GEN-12-09 - provides a “grandfather” test and various scenarios to assist determine if a student qualifies for the ATB alternative.
Grace Period Interest Subsidy

- Temporarily eliminates the interest subsidy on Direct Subsidized Loans during the six month grace period
- Applies to new Direct Stafford Loans for which the first disbursement is made on or after July 1, 2012, and before July 1, 2014
FFEL/Direct Loan Cohort Default Rates
HEOA Changes

- Increases the CDR monitoring period from two to three years.
- Beginning with the 2009 cohort, the calculation will be:
  - Borrowers who default in that federal fiscal year or by the end of the next two federal fiscal years.
  - Establishes a three-year transition period for sanctions.
## 2-Year Versus 3-Year Calculation

The **Numerator** is the number of borrowers from the denominator who default within a cohort period.

<table>
<thead>
<tr>
<th>Year</th>
<th>FY-09</th>
<th>FY-10</th>
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<tbody>
<tr>
<td></td>
<td>125</td>
<td>230</td>
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<tr>
<td></td>
<td>5,000</td>
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The **Denominator** is the number of borrowers who enter repayment within a cohort period.

<table>
<thead>
<tr>
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<th>FY-11</th>
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<tr>
<td></td>
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<td>5,000</td>
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- **FY-09**
  - Numerator: 125
  - Denominator: 5,000
  - Default Rate: \( \frac{125}{5,000} = 0.071 \) or 7.1%

- **FY-10**
  - Numerator: 230
  - Denominator: 5,000
  - Default Rate: \( \frac{230}{5,000} = 0.071 \) or 7.1%

- **FY-11**
  - Numerator: 250
  - Denominator: 5,000
  - Default Rate: \( \frac{250}{5,000} = 0.071 \) or 7.1%
2-Year vs 3-Year Cohort Default Rate

- 2010, 2011, 2012: 2nd 3-year rate
- 2010, 2011, 2012: Last 2-year transition rate
Default Prevention

- ED’s Default Prevention Resource Center

- Webinar Recordings – Delinquency and Default Prevention Conference
  - Several different presentations

- John Pierson (Atlanta Office)
  - Default Management and Prevention
  - john.pierson@ed.gov; 404-974-9315
Program Integrity Regulations

“REMINDEERS”
Topics Include

- Evaluating the Validity of High School Diplomas
- Ability to Benefit
- Misrepresentation
- Incentive Compensation
- State Authorization
- Credit Hour Definition
- Clock to Credit Hour Conversion
- Written Agreements Between Institutions
- Verification
- Satisfactory Academic Progress
- Repeated Coursework
- Return of title IV Aid (R2T4)
- Disbursement
- Gainful Employment
Program Integrity

- Notice of Proposed Rulemaking issued 6/18/10 to improve integrity of the Title IV programs
- Final regulations October 29, 2010
  - Generally effective July 1, 2011 (11-12 award year)
    - Exception
      - Verification and Updating - July 1, 2012
      - State Authorizations – possible one year extensions through July 1, 2012 and July 1, 2013

Electronic Announcement dated 9/2/11 –
  - Program Integrity regulation Q & A website
Credit Hour Definition

Regulations
600.2, 602.24, 603.24 & 668.8
Credit Hour Definition

• An amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates NOT LESS than—

- (1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately
  - Fifteen weeks for one semester/trimester hour of credit, or
  - Ten or twelve weeks for one quarter hour of credit, or
  - The equivalent amount of work over different amount of time

OR
Credit Hour Definition

• (2) At least an equivalent amount of work for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours
  – Discretion to determine in-class and out-of-class components to approximate requirements

• Regulations create procedures that accrediting agencies must use to determine if an institution’s assignment of a credit hour is acceptable

GEN-11-06
Satisfactory Academic Progress
SAP Policy

- Defined Pace of Progression
  - Dividing the cumulative number of hours the student has successfully completed by
  - The cumulative number of hours the student has attempted

- Describe how student’s GPA and pace of completion affected by incompletes, withdrawals, repetitions, or transfers of credits
  - Transfer credits accepted toward completion of student’s program must count as both hours attempted and hours completed
SAP Policy

- If evaluate each payment period (term), MAY have a Warning period
  - One payment period long
  - No appeal necessary

- Probation (only ONE payment period)
  - Student expected to be making SAP in next payment period; or
  - Be successfully following an academic plan designed to ensure student will be able to meet SAP by a specific point in time
SAP Policy - Appeal

- Appeals
  - Process by which student who is not meeting school’s SAP policy petitions for reconsideration of eligibility for Title IV
  - Policy must specify the conditions under which a student may appeal
    - Appeal must include:
      - Why the student failed to make SAP; and
      - What has changed that will allow the student to make SAP at the next evaluation
  - May specify how often and how many appeals are allowed
Verification and Updating of Student Aid Application Information 2012-2013
Verification Resources

• Federal Register July 13, 2011 – Verification Items
• GEN-11-13 and GEN-11-03 and GEN-12-07
• Q&A on Program Integrity web site:
• Sample 2012-13 Verification Worksheets
  – EA# - dated 2/3/12
• FAFSA-IRS Tax Return Transcript Matrix
  – EA# - dated 3/16/12 - REVISED
• 2012-13 Application and Verification Guide, Chapter 4
Verification Changes

- Institutions must verify all applicants selected by CPS for verification.
- For subsidized programs, submit all verification changes to CPS if change is:
  - Any nondollar item; or
  - A single dollar item of $25 or more
- If required to submit one change, must submit all changes.
Information to be Verified
2012-2013

• All Applicants selected by CPS
  – Number of household members
  – Number of household members in college
  – Food Stamps/SNAP – if reported on FAFSA
  – Child support paid – if reported on FAFSA

• Tax Filers selected by CPS
  – AGI
  – U.S. income tax paid
  – Untaxed income (Untaxed IRA distributions; Untaxed pensions; Education credits; IRA deductions; Tax exempt interest)

• Non-tax Filers selected by CPS
  – Income earned from work
Acceptable Documentation - Tax Filer -

- IRS Data Retrieval Process
- IRS Tax Return Transcript
  - By paper (Form 4506T-EZ or IRS Form 4506-T)—10 business days for processing
  - Online or by phone—5 to 10 business days for processing
- IRS Tax Account Transcript (amended returns)
  - By paper (Form 4506-T)—processed within 30 calendar days
  - Online or by phone—5 to 10 business days for processing
- Record of Account (initial and amended data)
  - By paper only (Form 4506-T)—processed within 30 calendar days
Marital Status Updating

• Marital status updates permitted only by FAA to address inequity or better reflect ability to pay—
  – When dependency status changes
  AND/OR
  – When selected applicant needs to update household size and number in college

• If FAA changes marital status, other updates may be needed

• May establish a cut-off date after which school will not consider marital status updates

• May not project marital status
*2013-2014* Verification
(processing year starts Jan. 1, 2013)

- Federal Register July 12, 2012 –
  - Verification Items and acceptable documentation
- GEN-12-11
  - All items from 12/13 remain in place PLUS two additional verification areas:
    - High school completion status
    - Identity/Statement of Education Purpose
- Starting to transition to customization verification
  - Verification tracking groups (V1-V5)
- IRS Data retrieval tool and/or transcripts still required process for tax-filers
Return of Title IV (R2T4)

Withdrawing from Term-Based Programs with Modules/Compressed Courses & Institutions Required to Take Attendance

GEN-11-14
Program Definitions

• New rules define a program “offered in modules”
  – A course or courses in program do not span entire length of payment period or period of enrollment
  – Doesn’t matter what “modules” are called at the institution

• Student considered to be a withdrawal if does not complete ALL days scheduled to complete within payment period/term
Is Student A Withdrawal?

1. Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?
   - If yes, go to question 2.
   - If no, student not a withdrawal

2. When ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses?
   - If yes, student not a withdrawal
   - If no, go to question 3

3. Did the student confirm attendance in a later module in the payment/enrollment period (45 day rule, if applicable)?
   - If no, student is a withdrawal.
   - If not a withdrawal, Pell recalculation may apply
R2T4 Modules

• For a withdrawn student who has made schedule changes
  – *Do not count days of courses officially dropped prior to complete cessation of attendance*

• “Undo” Process - withdrawn student may return to same program prior to end of payment period/period of enrollment
  • Student eligible for any Title IV funds for which eligible prior to withdrawal
R2T4
Required to take attendance

• An institution is required to take attendance if:
  • An outside entity (such as an accrediting or State agency) OR the institution itself requires instructors to take attendance
    • Either at the program, department or institutional level
  • An outside entity OR the institution has a requirement that can only be met by taking attendance or a comparable process
    • Example – requiring students in a program to demonstrate attendance in the program’s classes, or a portion of that program
Documenting Attendance

- Attendance could be academic attendance and attendance at an academically-related activity
  - Includes:
    - Physically attending class with direct interaction with instructor
    - Submitting academic assignment
    - Taking exam, interactive tutorial or computer-based instruction
    - Attending school assigned study group
    - *Participating in online discussions about academic matters and/or initiating contact with faculty to ask questions about subject studied*
Documenting Attendance

- Academic attendance and attendance at an academically-related activity
  - Does NOT include:
    - Living in school housing
    - Using school meal plan
    - *Logging into an online course without active participation*
    - Academic counseling or advisement
  - Student’s certification of attendance without school documentation is not acceptable
GAINFUL EMPLOYMENT PROGRAMS
Gainful Employment Information

or from IFAP Homepage
  - Regulations and Federal Register Notices
  - Dear Colleague Letters and Electronic Announcements
  - Frequently Asked Questions
  - Training, including webinars
  - Resources
Gainful Employment

We are currently reviewing the recent legal decision about the Gainful Employment regulations. We are unable to respond to any questions related to Gainful Employment at this time, but will provide additional guidance in the near future.

Electronic Announcement dated July 6, 2012 (GE EA #39)

- Provides background on decision
- Current school requirements
  - Do not have to report annual data for 11/12
  - Additional GE data not required to included for adding new GE programs
- Disclosure requirements still in affect

Stay tuned to IFAP for Updates!!!!
ADDITIONAL
DCLS &
ANNOUNCEMENTS
Dear Colleague Letters

- **GEN-12-12** – Financial Aid Shopping Sheet
  - Encouraged to be used by all schools
    - If used inform - ShoppingSheet@ed.gov with institutional name and institution’s OPE ID number
  - Required to be used by schools with service members under EO 13607 (principles of excellence)

- **GEN-12-10** – EO 13607 - Establishing Principles of Excellence for Educational Institutions Serving Service Members/Veterans/Spouses, and Other Family Members
  - Q & As

- **GEN-12-09** – ATB Alternative Exceptions and Limitations

- **GEN-12-08** – Disbursing Title IV aid through Contractors
Dear Colleague Letters

- **GEN-12-03** – Students without a valid HS Diploma
  - If institution identifies a student who did not possess a valid high school diploma when receiving Title IV aid for an award year prior to 2011-12, contact its School Participation Team

- **GEN-11-17** – Fraud in Distance Education Programs
Electronic Announcements

- **7/3/12** – one website for students/families – StudentAid.gov
- **6/29/12** – EO 13607 - Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members
  - Webinar Recording with Q & As
- **6/29/12** – Pell LEU System Enhancements
- **6/28/12** – G5 Functionality change - Campus-Based Funds
  - Ability to transfer Campus-Based funds between programs, between schools and between years in G5 was deactivated
- **3/22/12** – new G-845 form to use for secondary paper confirmation
Contacts

• Atlanta School Participation Team
  – MS, AL, FL, GA, NC, SC
  – Main Number:  404-974-9303
  – Laura Hall (IIS) – 404-974-9293
  – Cassandra Weems (IIS) 404-974-9305

• Atlanta Training Officers
  – MS, AL, FL, GA, NC, SC, KY, TN
  – David Bartnicki – 404-974-9312
  – Michael Roberts – 404-974-9313

Email:
  firstname.lastname@ed.gov
Feedback on Training
Thomas Threlkeld
Supervisor of Training Officers
617-289-0144; thomas.threlkeld@ed.gov
CHIEF WAYNE WILLCOX, MSCJ, CLEE
LT. JOHN TAYLOR, J.D., LL.M

- Commander, Cyber Forensics Division
- Department Legal Advisor
- Adjunct Professor, Criminal Justice Master’s Degree Program
- john.taylor@armstrong.edu
- 912-344-3230
Computer/Cyber Crime – a primer

- Growing at unprecedented levels
- Is going to be THE crime of the future
  - Why? Risk v. Rewards; Computer Generation
- Much computer/cyber crime goes unreported or unresolved
  - Why? Feds too busy, locals unable
- How are computers used in crime?
  - Tool to commit crime
  - Storage Device that holds evidence of a crime
Computer/Cyber Crime – a primer

- **Tool** = Substantive Computer Crime Law
  - Computer misuse – interference w/ intended functioning of computer
  - Traditional Crime – traditional crimes like fraud, theft, child pornography facilitated by a computer

- **Storage Device** = Procedural Computer Crime Law
  - Constitutional issues – 4th Amendment (search and seizure)
  - Statutory Privacy Law issues – Wiretap Act, Stored Communications Act, Pen Register Statute
  - Jurisdiction issues – traditional crimes local, computer crime multifaceted...local, interstate, international
Legal Issues – in Cyber Forensics

- Extraordinarily complex and confusing
  - Why?
  - Impact?
- Police Departments are uniquely suited to deal with these issues
  - Why?
- Must combine that with legal expertise
Case Study

- **United States v. Carey**, 172 F.3d 1268 (10 Cir. 1999).
  - Searching for evidence of narcotics transactions – search warrant
  - Found child pornography, continued to search for more child pornography & found additional child pornography
  - Evidence of child pornography suppressed, except for first picture
Case Study

  - Searching for evidence of financial & accounting documents, credit cards, credit applications, documents related to financial transactions, real estate appraisals – search warrant
  - Found child pornography, continued to search for original documents, but found additional child pornography
  - All evidence of child pornography admitted
Questions?
STUART GLASBY
Analyst, Cyber Forensics Division
- Digital Intelligence
- 23 3/4" High
- 8 3/8" Wide
- 25 1/4" Deep
- 80 lbs
Intel® Core™ i7-3820 CPU (Quad Processor), 3.6 GHz, 10MB Intel® Smart Cache, 5 GT/s DMI

16 GB PC3-12800 DDR3 1600 MHz Memory
1 x 300 GB 10,000 RPM SATA III Hard Drive – OS Drive

1 x 2.0 TB 7200 RPM SATA III Hard Drive – Data Drive

4 Hot Swaps: 3 SATA, 1 IDE

Blu-Ray Combo burner

R/O or R/W card inputs
- UltraBayII with imaging shelf
- Unique to FREDs
- Integrated IDE Drive Write Blocker
- Integrated SATA Drive Write Blocker
- Integrated SCSI Drive Write Blocker
- Integrated USB Write Blocker
- Integrated FireWire IEEE 1394b Write Blocker (Apple system)
ULTRAKIT

Disk Duplication and Imaging Hardware
4 Write Blockers
USB
SATA
IDE
Firewire
SCSI

Forensic Disk Duplicator
Transfer Rate
6GB/Min
CELEBRITE
UFED
Universal Forensic Extraction Device
Questions?
LT. JOHN BENNETT
Watch Commander, Cyber Forensics Analyst
Why the Police?

- Evidence
  - Civil and Criminal
  - Storage Requirements
  - Chain of Custody
  - Contamination
- Courtroom Testimony
- Training
Why the Police?

- Accreditation
- “Niche Specialty”
- Digital Contraband
- Investigative Thought Process
IT Services

- Chief Information Security Officer
- Examined Computer Live
- Pasted Log To Desktop
- Destroyed Evidence
- Did Not Find Any Evidence
- No Report
- “Professor Was Crazy”
IT Services
- Chief Information Security Officer
- Examined Computer Live
- Pasted Log To Desktop
- Destroyed Evidence
- Did Not Find Any Evidence
- No Report
- “Professor Was Crazy”

Police
- Cyber Forensics Analyst
- Created Forensically-Sound Image of Drive
- Examined Using FTK
- Discovered Evidence of Intrusion and Cover-up
- Thorough Report
- Professor Was Not Crazy
A Tool in Your Toolbox

- Reactive
- Proactive
  - Annual Checks
  - Problem Checks
  - Random Checks
QUESTIONS?
THE 2012 TOP TEN IT ISSUES

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Slides and information from Educause webinar presented to the higher education IT community.
The 2012 Top Ten IT Issues

1. Updating IT professionals’ skills and roles to accommodate emerging technologies and changing IT management and service delivery models
2. Supporting the trends toward IT consumerization and bring-your-own device
3. Developing an institution-wide cloud strategy
4. Improving the institution’s operational efficiency through information technology
5. Integrating information technology into institutional decision-making
The 2012 Top Ten IT Issues

6. Using analytics to support critical institutional outcomes
7. Funding information technology strategically
8. Transforming the institution’s business with information technology
9. Supporting the research mission through high-performance computing, large data, and analytics
10. Establishing and implementing IT governance throughout the institution
SO, HOW DO WE COMPARE
The 2012 Top Ten IT Issues

1. Supporting the trends toward IT consumerization and bring-your-own device (BYOD)
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LET’S GO DEEPER WITH A ONE...
ISSUE #2

Supporting the trends toward IT consumerization and bring-your-own device (BYOD)

Questions/Polls:
- Can we make it go away?
- Should we make it go away?
- Has your institution started any conversations regarding policies, standards, or procedures and BYOD?
- Do you have any policies already in place regarding BYOD?
Twenty-somethings expect to be able to BYOD to work: One in three say they would disregard their company's security policy if it forbade them to use their personal mobile devices at the office.

A survey conducted by Vision Critical on behalf of Fortinet between May 31 and June 12 asked more than 3,800 fully employed 20- to 29-year-olds worldwide about their views on bring-your-own device (BYOD) trends. About 75 percent of them say BYOD is commonplace, and 55 percent say using their mobile device at work is a "right" versus a "privilege."

Some 36 percent said they either have or would break company policy banning BYODs.
WHERE THE RUBBER MEETS THE ROAD
USG IT CONCERNS FOR RISK

From a conversation with USG CIO, Dr. Curt Carver and USG CISO, Stan Gatewood

- Domain Name Services (DNS) Hardening
- Logical Access – Identity and Access Management
- Privacy – Identify Personal Identifiable Information (PII)
- Bring Your Own Device (BYOD)
- IT Governance structure
- Compliance with standards around sensitive information  
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http://www.educause.edu/library/resources/top-ten-issues-higher-education-it-2012
THANK YOU!