



Federal Compliance Filing by Institutions

Effective September 1, 2020–August 31, 2021

Institutions should answer the questions below. The [Federal Compliance Overview](#) provides information about the applicable HLC policies and provides an explanation of each requirement. Please review the aforementioned Overview in its entirety prior to completing this Filing.

Note that some federal requirements are related to and accounted for in the Criteria for Accreditation or Assumed Practices. Those related Criteria and Assumed Practices have been identified for cross-referencing purposes. Cross-references are also provided to the Code of Federal Regulations. Because HLC may, in some cases, require more of its institutions than the federal regulations, it is important that institutions write to HLC's requirements to ensure their compliance not only with the federal regulations but also with HLC's expectations. Lastly, although cross-references to the Code of Federal Regulations are provided here, an institution is always responsible to ensure that it is familiar with the full and current text as well as the significance of those regulations, and that it is in compliance at all times with such regulations, as they may from time to time be updated.

Submission Instructions

This form and, if applicable, Appendix A should be uploaded to the Assurance System no later than the institution's lock date, unless otherwise noted. Instructions for uploading the documents are provided in the Assurance System. The necessary supporting documentation should be directly responsive to specific documentation requested. While there is no minimum expectation with respect to length, the completed Federal Compliance filing, including Appendix A (if applicable), should not exceed 250 pages.

Institution name: **Ferris State University**

1. Assignment of Credits, Program Length and Tuition

Provide web addresses to the following:

- Policy (or set of policies) and procedures for assignment of Credit Hour for all **types** of courses, disciplines, programs, credential levels, formats, regardless of modality.
- Course or program credit assignment procedures. (Note: The Federal Compliance reviewer will contact the institution's Accreditation Liaison Officer after the Federal Compliance materials are

received to request a sample of course and program materials. The purpose of the representative sample of materials is to enable the Federal Compliance reviewer to make a preliminary determination as to whether an institution ensures it is adhering to its credit hour policy.

Provide the web address to relevant policy/policies:

Links:

FSU Policy on Awarding Credit:

https://www.ferris.edu/admissions/registrar/academic_credit.htm

Kendall College of Art & Design (KCAD) 2019-2020 catalog (Page 16):

https://kcad.ferris.edu/uploads/docs/2019-2020_KCADCollegeCatalog.pdf

Provide the web address to relevant procedure(s):

Links:

FSU Procedure/Curriculum Manual (Pages 23-30):

<https://www.ferris.edu/HTMLS/administration/academicaffairs/vpoffice/senate/univcurrcomm/pdfs-docs/UCCManual2019-2020ASApproved11.5.19.pdf>

Kendall College of Art and Design (KCAD 2019-2020 catalog, Page 16):

https://kcad.ferris.edu/uploads/docs/2019-2020_KCADCollegeCatalog.pdf

Describe the process the institution utilizes to verify length of academic period and compliance with credit hour requirements through course scheduling.

Main Campus Process:

https://www.ferris.edu/HTMLS/administration/academicaffairs/Forms_Policies/Documents/Policy_Letters/AA-Course-Scheduling.pdf

KCAD Process:

Courses offered at KCAD are typically three credit hour courses. A three-credit hour General Education or Art History course meets for three contact hours each week of the semester. A three-credit hour Studio course meets for six contact hours each week of the semester. A contact hour is calculated as one credit equals 50 minutes. Any course meeting beyond two hours in length includes a 10 - minute break. A semester includes 15 weeks of class meetings.

Expectations for student time on course work is that for General Education or Art History courses each hour of course time requires an additional 2 hours of work outside of class meeting time. For Studio courses, each hour of class time requires an additional hour outside of class.

National Association of Schools of Art and Design Handbook (Pages 74-75):

<https://nasad.arts-accredit.org/wp-content/uploads/sites/3/2018/12/AD-2018-19-Handbook-07-12-2019.pdf>

For more information see Federal Requirements 34 CFR §§602.16(a)(1)(viii), 600.2, and 668.8(k) and (l).

Related HLC Requirements: Core Component 3.A. and Assumed Practice B.1.

2. Institutional Records of Student Complaints

Provide the web address to the institution's complaint policy.

Links:

Student Complaints:

<http://ferris.edu/studentcomplaints>

Title IX:

<https://kcad.ferris.edu/current-students/title-ix/>

<https://www.ferris.edu/title-ix/>

Code of Student Community Standards:

<https://www.ferris.edu/HTMLS/administration/studentaffairs/judicial/pdfs-docs/2019-2020-Code-of-Student-Community-Standards.pdf>

ALL POLICIES (1 stop source): <https://www.ferris.edu/policies>

Provide the web address to the institution's complaint procedure.

Link:

https://www.ferris.edu/HTMLS/administration/academicaffairs/Forms_Policies/Documents/Policy_Letters/AA-Student-Complaints.pdf

Code of Student Community Standards:

<https://www.ferris.edu/HTMLS/administration/studentaffairs/judicial/Student-Code.htm>

For more information see Federal Requirement 34 CFR §§602.16(a)(1)(ix).

Related HLC Requirements: Core Component 2.A and Assumed Practice A.3, A.4.

3. Publication of Transfer Policies

Provide the web address to the institution's transfer policies.

Links:

Policies:

https://www.ferris.edu/HTMLS/administration/academicaffairs/Forms_Policies/Documents/Policy_Letters/AA-Transfer-Credits.pdf

https://www.ferris.edu/HTMLS/administration/academicaffairs/Forms_Policies/Documents/Policy_Letters/AA-Michigan-Transfer-Agreement.pdf

https://www.ferris.edu/HTMLS/administration/academicaffairs/Forms_Policies/Documents/Policy_Letters/AA-Gen-Ed-Transfer.pdf

KCAD Course and Transcript Evaluation:

<https://kcad.ferris.edu/admissions/apply-undergrad/transfer-students/transfer-credit/>

<https://kcad.ferris.edu/admissions/apply-undergrad/transfer-students/>

<https://kcad.ferris.edu/admissions/apply-undergrad/transfer-students/macrao-agreement/>

Provide the web address where the public can access a list of institutions with which the institution has established articulation agreements. Note that you do not need to provide the full articulation agreements themselves, only the list of agreements that you make public. This list should include the name and location of the agreement partner, the extent to which the institution accepts credit for courses offered by the partner or offers courses for which credits are accepted by the partner, and any credit limitations.

Links:

FSU Articulation Agreements:

<https://www.ferris.edu/RSS/transfer/index.htm>

<https://www.ferris.edu/RSS/transfer/collegetransfer/guides/index.htm>

KCAD Articulation Agreements:

<https://kcad.ferris.edu/admissions/apply-undergrad/transfer-students/>

Provide the web address where current and prospective student can ascertain the institution's transfer requirements in addition to what will and will not transfer.

Links:

FSU Transfer Equivalency Guides:

https://banner.ferris.edu:9100/pls/GOLD/FSU_SK_SS_TransEquiv.P_TCEMain

KCAD Transfer Equivalency Tool:

<https://www.kcad.edu/current-students/course-equivalency/>

For more information see Federal Requirements 34 CFR §§668.5, 668.8, 668.43(a)(11) and 668.43(a)(12).

Related HLC Requirements: Core Component 2.A and Assumed Practice A.5.D.

4. Practices for Verification of Student Identity

Does the institution have students enrolled in distance or correspondence courses, as defined in federal definitions?

- Yes
- No (If no, please move on to the next section.)

How does the institution verify the identity of students enrolled in these courses?

Ferris State University verifies the identity of each student enrolled in and completing its courses and programs. Verification of student identity occurs upon enrollment, when official records (including transcripts) are required through the admissions process. The University re-verifies student identity through a variety of methods outlined in its student authentication procedures, including the requirement that students access their online courses through a secure login process. Online courses should provide sufficient interaction between students and instructors for verifying a student's identity. The University continuously monitors the requirements associated with student authentication at the accreditor, state, and/or national levels and evaluates whether its approaches best meet its requirements.

The FSU and KCAD procedures are online:

https://ferris.edu/HTMLS/administration/academicaffairs/Forms_Policies/Documents/Policy_Letters/AA-Student-Authentication.pdf

How does the method of verification make reasonable efforts to protect student privacy?

Students' personal information is protected through the University's policies and procedures related to FERPA. Unique FSU ID numbers and user names are issued to students when accepted at FSU. Online students must access their courses using these unique credentials through Canvas. Online students, like on-campus students, must have an official identification document that includes a picture. In order to secure a photo FSU ID card, card, online students must submit a copy of their driver's license with a recent photo. Some faculty require a lockdown browser for their students to take online exams. Some faculty also require that students show their FSU picture ID to the webcam prior to the start of the exam.

Are there any additional costs (e.g., fees associated with test proctoring) charged directly to the student because of this method?

- Yes
- No

If yes, how are the additional costs disclosed to students prior to enrollment in a distance or correspondence course?

N/A

Provide the web address where the public can access information regarding the additional costs.

Link: N/A

For more information see Federal Requirement 34 CFR §602.17(g).

Related HLC Requirement: Core Component 2.A.

5. Publication of Student Outcome Data

If an institution uses student outcome data in any marketing or recruitment content, the institution must make that data easily accessible to the public through its website—for instance, linked to the institution’s home page, included within the top three levels of the website or easily found through a search of related terms on the website. The data should be clearly labeled as such, any technical terms in the data should be defined, and any necessary information on the method used to compile the data should be included.

Are student outcome data published on the institution’s website following the specifications above?

Yes

No

Provide a link to the webpage(s) that contains the student outcome data.

Link(s):

<https://www.ferris.edu/disclosures/index.htm>

For more information see Federal Requirement 34 CFR §602.16(a)(1)(i).

Related HLC Requirement: Assumed Practice A.6.

6. Standing With State and Other Accrediting Agencies

List any relationships the institution has with any specialized, professional accreditor (e.g. Accreditation Commission for Education in Nursing; Council for the Accreditation of Educator Preparation) or institutional accreditor (e.g. Distance Education Accrediting Commission) or with any governing or coordinating bodies in states (e.g. Illinois Board of Higher Education; Arizona State Board for Private Postsecondary Education) in which the institution has a presence.

Note whether the institution or any of its programs is on a sanction, is provisionally approved or has lost status with any state agency or accrediting body.

See this link for ALL FSU accreditors (regional and specialized accreditation):

<https://www.ferris.edu/HTMLS/fsucatlg/accreditation.htm>

See this link for all KCAD accreditors (regional and specialized accreditation):

<https://kcad.ferris.edu/about/>

Provide the web address(es) where students and the public can find information about the institution's standing with state agencies and accrediting bodies.

Links:

FSU HLC: <https://www.ferris.edu/HTMLS/administration/academicaffairs/Accreditation/index.htm>

FSU Specialized Accreditors: <https://www.ferris.edu/HTMLS/fsucatlg/accreditation.htm>

<https://kcad.ferris.edu/about/>

For more information see Federal Requirements 34 CFR §§602.28, 668.41 and 668.43.

Related HLC Requirements: HLC Policy FDCR.A.10.090, Core Component 2.B; Assumed Practices A.7, C.4.

Additional Documents

Please attach the following documents as applicable:

Appendix A..... With respect to an institution's ongoing responsibilities under federal regulations, provide any action letters issued by the U.S. Department of Education that articulate a rationale for any negative actions (including limitation, suspension or termination actions by the Department; letter of credit requirements, fines or heightened cash monitoring imposed by the Department; or other negative findings on the basis of any OMB Circular A-133 [Single Audit] submitted by the institution) and any reports issued by the institution, if applicable, demonstrating the institution's improvement efforts in response to such communications.

Federal Compliance Filing Form
Ferris State University

Appendix A

Ferris State University A-133 Findings (3 Years)

FY17:

Federal Award Findings and Questioned Costs
2017-001 Student Enrollment Status Change
Student Financial Aid Cluster; Grant period - year ended June 30, 2017

- *Criteria:* Ferris State University should ensure that all student enrollment status changes are reported to NSLDS in a timely manner and no later than the required 60 day period.
- *Condition:* One student's enrollment change was not received by NSLDS within the required 60 day period in accordance with 34 CFR section 685.309.
- *Cause:* The University relied on the National Student Clearinghouse (NSC) to complete the NSLDS reporting and did not verify accurate or timely reporting by the NSC.
- *Effect:* Because of the failure to ensure that the NSC is timely reporting all student enrollment status changes to NSLDS, there is additional risk that other student enrollment status changes are not being reported within the 60 day required period.
- *Recommendation:* We recommend that the University ensure that all student enrollment status changes are being reported to NSLDS in a timely manner.
- *Views of Responsible Officials and Planned Corrective Actions:* Ferris State University contracts with the NSC, as our servicer to conduct enrollment-reporting functions on behalf of the University. The University recognizes its responsibility in timely and accurate enrollment reporting, and the necessity to work with the NSC to ensure that compliance is met in this area.

The issue of late reporting of graduation, turned out to be a set-up issue within NSC specific to four University campuses. Proper instruction was not provided to the University from the NSC regarding the changes that were needed for graduates. In order for graduation to be reported from NSC to NSLDS, each location with graduates must be set at NSC with a flag that will push the "G" (graduated), status students within an enrollment-reporting file to an additional file containing graduates only, which is transmitted to NSLDS. This flag was added to the four campuses affected, and we expect no further issues going forward.

In addition, the additional campus was reviewed to ensure proper set-up and found to be accurate. We will also be producing and sending an ad hoc enrollment-reporting file for each of the four campuses to NSC to ensure that all graduates at each location have been properly reported. This ad hoc file will be sent in August 2017.

FY18:

Federal Award Findings and Questioned Costs
2018-001 Student Enrollment Status Change
Student Financial Aid Cluster; Grant period - year ended June 30, 2018

- *Criteria:* Ferris State University should ensure that all student enrollment status changes are reported accurately to NSLDS in a timely manner and no later than the required 60 day period.
- *Condition:* Five student's enrollment changes were not received by NSLDS within the

required 60 day period in accordance with 34 CFR section 685.309 and four enrollment changes were reported with inaccurate effective dates.

- *Cause:* The University relied on the National Student Clearinghouse (NSC) to complete the NSLDS reporting and did not verify accurate or timely reporting by the NSC.
- *Effect:* Because of the failure to ensure that the NSC is timely reporting all student enrollment status changes to NSLDS, there is additional risk that other student enrollment status changes are not being reported within the 60 day required period.
- *Recommendation:* We recommend that the University ensure that all student enrollment status changes are being reported to NSLDS in a timely manner.
- *Views of Responsible Officials and Planned Corrective Actions:* Ferris State University (FSU) takes enrollment reporting responsibilities very seriously, and has been relatively issue free for the last several years. Number of findings from the last four single audits: 2013-2014: 0; 2014-2015: 0; 2015-2016: 1; 2016-2017: 1. Our finding from 2016-2017 was related to a graduated student that was not reported to NSLDS in the required timeframe. This prompted us to research our graduation reporting. We found that the NSC "degree verify file to grad status" process, which is recommended by NSC, is problematic, and that some schools had switched their process to a "graduate only" file. FSU also made this change during spring 2018. An initial test of graduates from spring 2018 was successful; we will also conduct the same testing for summer 2018 graduates. We expect this issue to be resolved shortly.

One student was enrolled in both FSU credits (3), and consortium credits (3, Delta College), for fall 2017. He withdrew from his FSU credits on September 19, 2017. He continued in his 3 consortium credits, and completed and passed the class.

Consortium students have a complicating issue; we must have the official transcript from the consortium school in order to determine the student's correct end of term enrollment status. The student's transcript from the consortium school was received on January 3, 2018. This would be our date of notification. Therefore, we concur that the enrollment status change was reported late to NSLDS.

FSU will work to refine its procedures for consortium students to ensure that necessary reporting occurs within the allowable timeframes.

After much research, we believe that the inaccurate effective dates issues are related to Banner processes. Banner stores two dates related to enrollment status changes: the effective date and the processed date. Normally, these are the same. However, during high volume periods, such as the first week of classes or the last day to withdraw, the process date may be a few days after the effective date. We learned that Banner is currently pulling the process date for these changes. We are working with our programmers to adjust our enrollment reporting extract to pull the effective date only. We expect that this issue will be resolved shortly.



June 24, 2020

Dr. David Eisler, President
Ferris State University
1201 South State Street
Big Rapids, MI 49307-2251

RE: Final Audit Determination

Audit Control Number (ACN): 05-2019-01991

FAC ACN: 05-2019-010188

OPE ID Number: 00226000

Dear Dr. Eisler:

The U.S. Department of Education (Department) has reviewed a single audit report of Ferris State University (FSU). This audit report, prepared by Andrews Hooper & Pavlik, PLC, CPAs, in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), covers the period July 1, 2018 through June 30, 2019. This letter advises FSU of the Department's final audit determination concerning the portions of the audit report that relate to the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs).

The Department has reviewed the corrective action plan and/or management's response provided with the audit report. Enclosed is the Department's final audit determination. Also enclosed is FSU's response to this audit. Any supporting documentation submitted with the institution's written response is not included with this final audit determination. However, it will be retained and available for inspection by FSU upon request. Copies of the final audit determination, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this final audit determination is issued.

Although the enclosures to this letter may not address each of the auditor's findings, the institution must take the necessary actions to correct all of the deficiencies noted in the audit report. Sections .200.511(b) and .200.512(c) of the Uniform Guidance require FSU to prepare and submit as part of the reporting package a *Summary Schedule of Prior Audit Findings* that reports the status of prior audit findings. In preparing that Schedule, FSU must comment on all actions taken to correct each finding noted in this audit report, including any action required in the enclosures to this letter.

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

Federal Student Aid, Chicago/Denver School Participation Division
230 S. Dearborn St., Chicago, IL 60604-1505
www.StudentAid.gov

The institution is advised that repeat findings in future audits or failure to satisfactorily resolve the findings of this audit may lead to an adverse administrative action. An adverse action may include the imposition of a fine, or the limitation, suspension, or termination of the eligibility of the institution pursuant to 34 C.F.R. Part 668 Subpart G.

Program records relating to the period covered by this audit must be retained until the later of: resolution of any loans, claims, or expenditures questioned in the audit, 34 C.F.R. § 668.24(e)(3)(i), or the end of the retention period applicable to the record under 34 C.F.R. §§ 668.24(e)(1) and (e)(2).

FSU's continued cooperation throughout the audit resolution process is appreciated. If the institution has any questions about our review, please call Rosa Reth at (312) 730-1469.

Sincerely,

Jeremy Early, Ed. D.
Division Chief

Enclosure: Final Audit Determination

cc: Heidi Wisby, Financial Aid Director
The Higher Learning Commission
Michigan State Legislature
Texas Higher Education Coordinating Board

ACN: 05-2019-01991

FAC ACN: 05-2019-010188

INSTITUTION: Ferris State University

FINDING: 2019 – 001, Student Enrollment Status Change, Page 11 – REPEAT FINDING

Finding

The auditor noted for three of the 35 students tested, the enrollment changes were not received by the National Student Loan Data System (NSLDS®) timely.

The institution relied on the National Student Clearinghouse (NSC) to complete the NSLDS reporting and did not verify accurate or timely reporting by the NSC. As a result, the institution failed to ensure NSC was timely reporting all student enrollment status changes to NSLDS.

The auditor recommended the institution ensure all student enrollment status changes are being reported to NSLDS in a timely manner.

Questioned Costs: \$0

Final Audit Determination

Upon receipt of an enrollment report from the Secretary, a school must update all information included in the report and return to the Secretary within the timeframe prescribed by the Secretary. Unless the school expects to submit its next updated enrollment report to the Secretary within the next 60 days, a school must notify the Secretary within 30 days after the date the school discovers a loan was made to or on behalf of a student who was enrolled or accepted for enrollment at the school, and the student has ceased to be enrolled on at least half-time basis or failed to enroll on at least a half-time basis for the period for which the loan was intended or for a student who is enrolled at the school and who received a Title IV loan has changed his or her permanent address. See 34 C.F.R. § 685.309(b).

The Department has facilitated student status reporting by incorporating the function into NSLDS. All schools that are approved to participate in Federal Student Aid (FSA) programs must have some arrangement to report student enrollment data to NSLDS through a Roster file. At scheduled times throughout the year, not less than semiannually, NSLDS sends Roster files to institutions' electronic mailboxes.

Status changes also may be reported directly online at the NSLDS website. Unless the institution expects to receive a scheduled Roster file within 30 days, and therefore, will be submitting a completed Roster file within 60 days, status changes must be reported within thirty days of institution's discovery of a borrower's drop to less than half-time enrollment status.

Institutions are responsible for monitoring the enrollment status of all borrowers' attendance, including those who have not received loans at the institutions they are currently attending. Student enrollment status determines the date a borrower enters a grace or repayment period, the timing of Department's payment of interest subsidies, and whether a borrower is eligible for in-school deferment privileges. Therefore, timely and accurate reporting of enrollment data for borrowers are critical. An institution that fails to timely report enrollment data may cause unnecessary expense to the borrower, and to the Department in administering the loan programs.

ACN: 05-2019-01991

FAC ACN: 05-2019-010188

INSTITUTION: Ferris State University

FINDING: 2019 – 001, Student Enrollment Status Change, Page 11 – REPEAT FINDING

Continued, Page 2 of 2

In its Corrective Action Plan, the institution concurred with the finding. Management re-assessed processes and procedures to include more frequent reporting. In the past, FSU generally reported once a month but have since doubled their reporting submissions. In addition, FSU has strategically adjusted their reporting calendar to account for expected delays and data transmission dates.

This finding has been repeated in the institution's last two compliance audits and therefore, the institution is reminded that 34 C.F.R. § 668.16 states that a participating Title IV institution must demonstrate that it is capable of properly administering the Title IV programs. The institution's inability or unwillingness to resolve a deficiency that has been previously identified in prior compliance audits may represent a lack of administrative capability on the part of the institution as well as a possible lack of control over Title IV funds.

Failure to correct deficiencies which have been previously cited in audits and program reviews may result in the institution being referred to the Department's Administrative Actions and Appeals Service Group (AAASG) for possible adverse action. Such actions may include a fine, or the limitation, suspension, or termination of the eligibility of the institution. Further action may also include the revocation of the institution's Program Participation Agreement (if provisional), or, if the institution has an application pending for renewal of its certification, denial of that application.

FSU is required to implement procedures or enhance current procedures in accordance with the auditor's recommendation to bring the institution into compliance with federal regulations to ensure that this finding does not recur.

Finding

The auditors noted the institution did not designate an individual to coordinate the information security program and perform a risk assessment that addresses those areas noted in 16 CFR 314.4(b) and document safeguards for identified risks.

The institution was still in the process of formalizing the risk assessment.

The auditor recommended the institution complete the risk assessment for the areas required by the Gramm-Leach-Bliley Act and ensure that there are documented safeguards for identified risks.

Questioned Costs: \$0

Final Audit Determination

The Federal Trade Commission (FTC) has ruled that most colleges are subject to the provisions of the Financial Services Act's Security Provisions (also known as the Financial Services Modernization Act). In the regulation, the commission created a definition of financial institutions that includes most colleges on the basis of the financial relationships they have with students, donors, and others. Consequently, colleges must adopt an information security program and draft detailed policies for handling financial data covered by the law, such as parents' annual income, and take steps to protect the data from falling into the wrong hands.

Under their Program Participation Agreement (PPA) and the Gramm-Leach-Bliley Act (Public Law 106-102), schools must protect student financial aid information, with particular attention to information provided to institutions by the Department or otherwise obtained in support of the administration of the federal student financial aid programs. The GLBA requires institutions to, among other things including:

- Develop, implement, and maintain a written information security program;
- Designate the employee(s) responsible for coordinating the information security program;
- Identify and assess risks to customer information;
- Design and implement an information safeguard program;
- Select appropriate service providers that are capable of maintaining appropriate safeguards; and
- Periodically evaluate and update their security program.

Presidents and Chief Information Officers of institutions should have, at a minimum, evaluated and documented their current security posture against the requirements of GLBA and have taken immediate action to remediate any identified deficiencies. See 16 C.F.R. §§ 313.3(n) 314.1–5, Financial Services Modernization Act of 1999 Pub. L. No. 106-102 Sections 501 and 505(b)(2). Also see GEN-15-18.

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FINDING: 2019 – 002, Information Security Program and Risk Assessment, Page 12

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In its Corrective Action Plan, FSU concurred with the finding. Subsequent to the audit, Interim Chief Technology Officer added a full University Technology Risk Assessment to the IT Department's project list.

Your auditor could not verify FSU met certain requirement(s) of the Gramm-Leach-Bliley Act. Although this finding is resolved, it has been referred to the Federal Trade Commission (FTC) Bureau of Consumer Protection Division Privacy and Identity Protection. Investigative and enforcement authority for this finding falls within their jurisdiction. If the FTC initiates action, FSU will be notified by the FTC. As a result of this referral, ED considers this finding satisfactorily closed.