

STUDENT RECORDS & REGISTRATION

SAN MARCOS

Report Number 99-25

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ABBREVIATIONS

AACRAO	American Association of Collegiate Registrars and Admissions Officers
CSU	California State University
EO	Executive Order
FERPA	Family Education Rights and Privacy Act
OUA	Office of the University Auditor
SCT	Systems & Computer Technology Corporation
SIMS/R	Student Information Management System/Relational
SIS+	Student Information System Plus
SMART	San Marcos Access Resources Telephone System

INTRODUCTION

PURPOSE

The primary purposes of this audit are to: furnish an independent appraisal of the student records and registration functions; ascertain compliance with established policies and procedures; determine adequacy of internal controls; and identify opportunities for operational improvements which would promote achievement of goals and objectives.

Within the overall audit objective, specific goals included determining whether:

- ▶ systemwide requirements in executive orders 268, 320 and 382 have been implemented;
- ▶ only authorized grades/grade changes are posted to students' records;
- ▶ there are reasonable access and disclosure provisions for protected student records including safeguards preventing the release of personal and confidential information unless the written consent of the student has been received;
- ▶ students can examine the contents of their educational records and request amendments;
- ▶ campuses respond to requests for records within a reasonable amount of time;
- ▶ transcripts are controlled;
- ▶ there is a reasonable records management program;
- ▶ there is equity in registration priorities;
- ▶ touch tone and voice response technologies are appropriately used; and
- ▶ add/drop procedures are consistently followed.

SCOPE AND METHODOLOGY

The scope of the student records audit as presented in Attachment B, Agenda Item 2 of the January 1999 meeting of the Committee on Audit included database integrity, security and confidentiality, and the enrollment process.

In the CSU, student records are defined by Executive Order (EO) 382 as follows:

Student records means any personally identifiable student-related information maintained by a campus whether recorded by handwriting, print, tape, film, microfilm or other material means.

The concept of “personally identifiable” defines the scope of student records, subject to certain well-defined exceptions. These exceptions include:

- a) personal records kept in the sole possession of the maker and not accessible or revealed to any other individual, e.g., a professor’s notes;
- b) police records used solely for law enforcement purposes;
- c) employment records; and
- d) health records created by a licensed physician, psychiatrist, psychologist, or other recognized professional or paraprofessional in connection with provision of treatments.

The Office of the University Auditor (OUA) has established an audit universe for the CSU and a breakdown of the universe into potential audit topics for risk assessment and ranking. Several topics are closely related to student records such as: analytic studies/institutional research (includes enrollment reporting); data processing centers, security management and data communications; and admissions and evaluations (includes residency determinations). For purposes of this audit, emphasis is placed on student records not otherwise covered in other OUA audits.

BACKGROUND

The main student recordkeeping systems on the CSU campuses are automated databases supported on different software packages as follows:

Banner	SIS Plus	SIMS/R	Champlain
Bakersfield	Chico	Fresno	Maritime Academy
Dominguez Hills	Fullerton	Northridge	
Humboldt	Hayward	San Diego	
Monterey Bay	Long Beach	San Francisco	
Pomona	Los Angeles		
San Marcos	Sacramento		
Sonoma	San Bernardino		
Stanislaus	San Jose		
	San Luis Obispo		

The Banner and Student Information System Plus (SIS+) systems are products of Systems & Computer Technology (SCT) Corporation. The Student Information Management System/Relational (SIMS/R) database is a CSU developed system in an Oracle client/server environment. The student administration module of PeopleSoft will eventually replace these systems. At the time that this report was written, the

current PeopleSoft implementation schedule had not yet been finalized. One recent plan has two different alternatives that carry forward the concept of campus groups or waves that will phase in over a period of time that may not start until late 1999 and not conclude until early 2006.

The Office of the University Auditor (OUA) completed an audit of student records in 1990 at the following seven campuses, and summarized these audits in a systemwide report numbered 90-01:

CAMPUS	REPORT#
Chico	90-02
Humboldt	90-09
Pomona	90-08
Sacramento	90-05
San Francisco	90-06
San Luis Obispo	90-04
Sonoma	90-03

The student records and registration function at the San Marcos campus is the responsibility of enrollment services, which is under the direction of the executive director. The executive director reports to the vice president for academic affairs.

The automated system for student recordkeeping at San Marcos is the Banner Student Information System from SCT Corporation. This system runs on an IBM mainframe computer.

Registration at the San Marcos campus is predominantly accomplished by students through a telephone-based system – SMART (San Marcos Access Resource Telephone). SMART WEB and manual registrations augment SMART.

OPINION

We visited the campus from April 26 to June 10, 1999, and audited the policies and procedures in effect at that time.

During the course of the audit, we:

- ▶ interviewed management and operating personnel;
- ▶ inspected facilities used to store student records;
- ▶ reviewed various documents, policies, and procedures;
- ▶ tested selected controls and systems integral to student records and registration.

We found that the campus had a reasonable student records program and registration process. However, within the centralized student records area, certain systemwide policy compliance requirements had not been met. As described further in the report, we have reservations about the level of protection provided to student record information by the campus. Additionally, improved control procedures for grades and grade changes are needed.

Areas that warrant the attention of management are mentioned in the executive summary.

EXECUTIVE SUMMARY

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

STUDENT RECORD POLICY ADMINISTRATION [6]

WRITTEN POLICY [6]

The campus registration and records office had not established formal written policies and procedures implementing the statutes and regulations governing student educational records privacy rights. Establishing written policies and procedures would help to ensure that students are aware of their privacy right.

BIENNIAL REVIEWS [6]

The campus had not been conducting biennial reviews of information management practices concerning student records. Conducting biennial reviews helps to ensure that information practices concerning student records are appropriate and continually evaluated.

RECORDS ACCESS [7]

The campus did not maintain a central log of requests for student record information. Establishing a central log is one option that would help ensure maintenance of accurate and complete recordkeeping on access requests and disclosures of protected student information.

PROTECTION OF STUDENT RECORDS [8]

Hardcopy student records were not adequately protected from potential water and fire damage. Adequate protection of student records reduces the risk of loss of important documents.

SUBPOENAED RECORDS [9]

The campus did not always attempt to contact students/former students and alumni when subpoenas for records were received. Documenting attempts to contact students and alumni would help to mitigate any legal liability.

GRADES [10]

WITHDRAWAL "W" DOCUMENTATION [10]

Reasons for withdrawals after the census date were not consistently well documented. Providing the records office with written documentation of delegations of authority reduces confusion over proper authorization of withdrawals, and capturing "W" documentation completes the student record.

COURSE WITHDRAWAL SIGNATURE REQUIREMENTS AND DEADLINES [11]

The campus has extended the period in which students can withdraw without the permission of the instructor from census date to the end of the seventh week of instruction. Establishing signature authorizations and cut-off deadlines consistent with systemwide policy would assure appropriate and timely participation by all parties involved in the withdrawal process.

GRADE CHANGE [12]

Controls and procedures for receiving and handling grade changes were inadequate. Establishing adequate control procedures for handling grade changes would ensure their proper authorization.

GRADE APPEALS [13]

There was no student representation on the student grievance committee for fiscal year 1998-99. Ensuring student representation on the student grievance committee would mitigate due process concerns.

ANNUAL REPORTING [13]

The student grievance committee did not prepare and submit an annual report on grade appeals to the campus president and faculty senate/council as required. Preparing and submitting annual reports helps to ensure executive level oversight of grade appeals and the grade appeals process.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORD POLICY ADMINISTRATION

WRITTEN POLICY

The campus registration and records office had not established formal written policies and procedures implementing all statutes and regulations governing student educational records privacy rights.

The 1999-2000 campus general catalog states that a set of policies and procedures concerning implementation of student privacy rights could be obtained at the Office of the Executive Director of Enrollment Services. However, our review disclosed that these policies and procedures did not exist.

The campus director of registration and records initially indicated it was her understanding that such written policies and procedures did exist. Later in the audit, she advised us that they were being drafted.

Executive Order (EO) 382, with an effective date of March 10, 1982, requires each campus to adopt a written policy statement establishing the various procedures by which the campus intends to comply with FERPA.

Without written policies and procedures, students may not be fully aware of their privacy rights regarding educational records.

Recommendation 1

We recommend that the campus establish formal written policies and procedures implementing educational records privacy rights.

Campus Response

While we have carefully followed in practice the requirements set forth in the Family Educational Rights and Privacy Act, we agree that written policies and procedures are in order. We have begun drafting our FERPA policies and procedures and expect to finish the project in January 2000 in time for publication in the next edition of the University's General Catalog.

BIENNIAL REVIEWS

The campus had not been conducting biennial reviews of information management practices concerning student records.

Section D of Executive Order 382 requires the campus to establish procedures for reviewing the campus' information management practices concerning student records. It further states that:

Such reviews shall be conducted biennially and the results shall be forwarded to the Chancellor by the President.

The director of student records and registration indicated that she and the dean of students discussed some of the review areas. However, nothing was documented.

The absence of biennial reviews increases the risk of inappropriate information management practices.

Recommendation 2

We recommend that the campus conduct biennial reviews of information practices concerning student records.

Campus Response

As required by the Executive Order, a biennial review plan, including a calendar of activities and accountabilities for task completion, will be completed by July 1, 2000.

RECORDS ACCESS

The campus did not maintain a central log of requests for student record information.

Executive Order 382, Section B states that each campus shall maintain a log which lists all persons, agencies, or organizations requesting or receiving information from the record and the legitimate interest these parties had in requesting or obtaining the information.

In the 1990 sequence of audits on student records (that did not include San Marcos), the concept of access logs was highlighted as a concern. This concern arose because of disparities in actual practice among the campuses and the need to address the larger question of whether each unit that handled student records should be required to maintain a log or alternatively, whether one central location should be designated for logging purposes. In response to these audits, the Chancellor's Office issued Academic Affairs (AA) coded memorandum number 91-06 that directed the campuses to address access records in their biennial reviews.

The concept of a log is not specifically addressed in FERPA. FERPA requires that the campuses maintain a record of each request for access to and disclosure of personally identifiable information from the educational records of each student. A record does not even have to be kept if the request was made by or disclosure was made to:

1. students reviewing their own records;

2. any school official with legitimate educational interest;
3. a party with written consent from the student;
4. a party seeking only directory information; and
5. a party seeking or receiving the records as directed by a court order or law enforcement subpoena.

At San Marcos, requests for student records are directed to the campus office having primary responsibility for the records.

The absence of a central log of requests for student records places the campus in the position of not being able to provide students an accurate and complete list of persons, agencies or organizations accessing their files.

Recommendation 3

We recommend that the campus consider a central log of requests/disclosures for student records and address the FERPA recordkeeping requirements for all campus locations handling student records.

Campus Response

The Office of Registration and Records is creating a central database to track requests that are required by FERPA. It is planned to have it operational by March 2000.

PROTECTION OF STUDENT RECORDS

Hardcopy student records were not adequately protected from potential water and fire damage.

Hardcopy records of transcripts from CSU San Marcos and other educational institutions, letters of recommendation, and counseling and evaluative documents were kept in cardboard boxes that were susceptible to fire and water damage.

The security standards of the American Association of Collegiate Registrars and Admissions Officers (AACRAO) state that records managers must take appropriate measures to reduce the vulnerability of records to loss and alteration through human error, natural disaster, sabotage, accident, negligence, fraud or technological obsolescence.

The director of registration and records stated that, due to a lack of funds, fireproof cabinets had been a low priority.

Failure to take adequate protective measures exposes the campus to the risk of loss of irreplaceable student records.

Recommendation 4

We recommend that the campus ensure that student records are adequately protected.

Campus Response

The University is currently conducting a technical review of an adjusted 1999-00 minor capital improvement budget request from the Office of Enrollment Services to make the necessary renovations to assure fire and water protection of student records. We anticipate funding this request and beginning work on the project during the current fiscal year.

SUBPOENAED RECORDS

The campus did not always attempt to contact students/former students and alumni when subpoenas for records were served.

Part IV of the Records Access Manual issued by the Office of the General Counsel states that as long as an effort is made to notify the student, there is no need for written consent from the student when responding to a subpoena.

The administrative assistant to the executive director of enrollment services stated that she handles all subpoenas for student records relating to enrollment services. Separate files are prepared for each request.

We reviewed eight subpoenas received during fiscal year 1998-99 and found three instances where there was no documentation of efforts to notify the student. The administrative assistant to the executive director of enrollment services stated that she was not aware of the requirement.

Failure to document efforts to notify students of subpoenaed records may expose the university to the risk of legal liability.

Recommendation 5

We recommend that the campus document its efforts to notify students of subpoenas for student records.

Campus Response

The Office of Enrollment Services implemented procedures responding to this recommendation shortly after we were notified of this preliminary finding.

GRADES

WITHDRAWAL "W" DOCUMENTATION

Delegations of authority by college deans to sign course withdrawals after the census date were not documented and forwarded to the campus records office. The reasons for withdrawals after the census date were not consistently well documented.

Executive Order (EO) 268 has progressively more difficult standards for acceptable use of the "W" (Withdrawal) grading symbol based on the timing of the action in relation to completion of the term as follows:

Withdrawals after the census date and prior to the last three weeks of the instruction are permissible only for serious and compelling reasons. Permission to withdraw during this time shall be granted only with the approval of the instructor and the department chairman or dean. All requests to withdraw under these circumstances and all approvals shall be made in writing on forms prescribed by the campus. The request and approval shall state the reasons for the withdrawal.

Withdrawals shall not be permitted during the final three weeks of instruction except in cases, such as accident or serious illness, where the cause of withdrawal is due to circumstances clearly beyond the student's control.

The supervisor of registration and records stated that the responsibility for signing course withdrawals, in some colleges, is delegated by the deans to the associate deans or college advisors. She further stated that these delegations historically have not been established in writing and forwarded to the records office. During our review, we tested fourteen withdrawals after the census date and found that eight were approved by two college advisors. In three of the eight instances, there was no documentation of a serious and compelling reason. One advisor stated that she was not aware of the aforementioned policy and that she had received no direction, policy, or procedures accompanied by the delegation of authority to sign course withdrawals.

The supervisor of registration and records indicated that, if the request was properly authorized in accordance with campus policy, there was an implicit understanding that the reason was adequate.

Without a written delegation of authority, the registration and records office cannot assure properly approved grade posting to a student's permanent record. Unless supporting documentation is submitted stating the reason a "W" grade was issued after the census date, the student record is incomplete.

Recommendation 6

We recommend that the campus:

- a. document delegation of authority to sign course withdrawals in writing and forward the delegation to the registration and records office; and
- b. improve documentation on the reasons for "W" grades.

Campus Response

The college deans have agreed to document both the delegation of authority to sign course withdrawals and the reasons for "W" grades. The Office of Registration and Records will serve as the depository for this documentation, effective January 2000.

COURSE WITHDRAWAL SIGNATURE REQUIREMENTS AND DEADLINES

The campus has extended the period in which students can withdraw without the permission of the instructor from census date to the end of the seventh week of instruction.

Executive Order 268 provides two specific window periods for withdrawals. The initial period extends from not later than the census date to the last three weeks of instruction. During this period, withdrawals must be approved by the instructor and a department chair or dean. In the second window (defined as the last three weeks of instruction), withdrawals require that an academic administrator appointed by the president to act in such matters also endorse prior approval by the instructor and a department chair or dean.

The fall 1998 registration calendar for CSU, San Marcos indicated that the last date to withdraw from a course with a "W" grade was October 15, 1998, the end of the seventh week of instruction. With respect to this date, the campus catalog states that "permission of the instructor is not required for dropping a class on or before the published deadline for dropping a course with a W."

By establishing the withdrawal cut-off date in mid October, the campus is extending to students the opportunity to withdraw from individual courses without the necessary approvals and releasing instructors and other academic administrators from approval requirements.

Recommendation 7

We recommend that the campus:

- a. establish a deadline for dropping courses without approval of not later than the census date; and
- b. require approval of withdrawals after the deadline by the instructor and other designated academic administrators.

Campus Response

A proposal has been submitted to the Academic Senate to modify current University policy to comply with this recommendation. The new policy is expected to be approved before the conclusion of the spring semester in May 2000.

GRADE CHANGE CONTROLS

Controls and procedures for receiving and handling grade changes were inadequate.

SAM §20003 states that a satisfactory system of internal control includes procedures to be followed in the performance of job duties and responsibilities.

During our review of grade change procedures and practices, we found the following:

- grade changes generally are not received in the registration and records office directly from faculty, but are collected by other staff and forwarded for processing;
- there were no control procedures to identify the person within enrollment services receiving grade changes;
- there was no confirmation of grade changes after processing;
- the number of campus staff having grade change capability totaled twenty-four excluding system development/software engineering staff; and
- there was no monitoring of grade changes by management to assure adequate security of grade change access and to assure that campus staff was not accessing and making grade changes to their own records.

The director of registration and records indicated that the Banner student records system tracks grade changes by user. However, she did not periodically review grade change reports.

Without adequate handling and processing procedures and controls, unauthorized grade changes may occur.

Recommendation 8

We recommend that:

- a. the campus establish controls and procedures for receiving and handling grade changes;
- b. grade changes be confirmed with instructors after processing;

- c. grade change system access be limited to as few people as possible; and
- d. registration and records office management obtain and periodically review grade change summary reports.

Campus Response

The Office of Registration and Records implemented all four parts of this recommendation shortly after we were notified of this preliminary finding.

GRADE APPEALS

There was no student representation on the student grievance committee for fiscal year 1998-99.

At CSU San Marcos, the student grievance committee is delegated the responsibility for hearing grade appeals and providing safeguards to ensure due process for both student and instructor.

EO 320 establishes minimum standards for campuses governing the assignment of grades and grade appeals and requires each campus to implement policies and procedures that include establishing one or more committees for hearing grade appeals. Such a committee shall include student membership.

The chairperson of the student grievance committee stated that the associated students was contacted and asked to provide a representative, however, one was not provided. She further indicated that, in prior years, student representatives initially attended committee meetings but gradually stopped.

Without student representation on the student grievance committee, due process may be called into question.

Recommendation 9

We recommend that the campus ensure there is student representation on the student grievance committee.

Campus Response

A student representative will be appointed to the Student Grievance Committee, beginning with the Spring 2000 semester.

ANNUAL REPORTING

The student grievance committee did not prepare and submit annual reports on grade appeals to the campus president and faculty senate/council as required.

EO 320 requires annual reporting to the president and campus faculty senate/council on the number of grade appeal cases heard and the disposition of each case.

The chairperson of the student grievance committee indicated that she forgot to prepare an annual report.

The absence of feedback from the student grievance committee reduces management effectiveness and oversight of grading and the grades appeals process.

Recommendation 10

We recommend that the student grievance committee prepare and submit grade appeals reports as required.

Campus Response

The chair of the Student Grievance Committee will be asked to submit annual reports beginning in May 2000.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Alexander Gonzalez	President
Rochelle Boehning	Program Director, Department of Computer Science
Richard Bray	Program Director, Department of Biology
Deborah Coronado	Assistant Director, Human Resources Management
Regina Eisenbach	Center Director, Service Sector Management, College of Business Administration
Ken Guerrero	Assistant Director, Student Financial Services
Jennie Green	Interim Dean, College of Business Administration
Cherine Heckman	Director, Office of Registration and Records
Alice Hoskins	Transcripts/Registration Specialist
Mike Irick	Unix System Administrator
Richard Karas	Vice President for Academic Affairs
Ron Henning	Supervising Analyst/Programmer
Sandra Kuchler	Dean of Students
Toby Mandel	Information Assistant, Office of Registration and Records
Michelle Ojeda	Supervisor, Financial Aid Business Office
Diane Petersen	Programmer/Analyst, System Development/Software Engineering
Sandra Punch	Director, Career Assessment Center
Richard Riehl	Executive Director of Enrollment Services
Jerri Richards	Technical Projects Coordinator
Shawn Siah	Assistant to the Executive Director of Enrollment Services
Carmen Villa	Administrative Assistant to the Executive Director of Enrollment Services
Wayne Veres	Director of System Development and Software Engineering/Computing and Telecommunications
Ellen Villalobos	Supervisor, Registration and Records
Mary Waddell	Associate Dean of Students
Kathleen Watson	Interim Associate Dean, College of Business Administration