

STUDENT RECORDS & REGISTRATION

**CALIFORNIA STATE UNIVERSITY
HAYWARD**

**Report Number 99-27
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Members, Committee on Audit

Stanley T. Wang, Chair
Harold Goldwhite, Vice Chair
Roberta Achtenberg Dee Dee Myers
Joan Otomo-Corgel Frederick W. Pierce, IV
Ali C. Razi

Staff

University Auditor: Larry Mandel
Senior Director: Norm Buettner
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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
I	Incomplete – an administrative grading symbol authorized by EO 268
OUA	Office of the University Auditor
SAM	State Administrative Manual
SCT	System & Computer Technology
SIS+	Student Information System Plus
SIMS/R	Student Information Management System/Relational
SAILOR	Student/Administrative Information Link On-line Registration

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 data base 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, tapes, 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 are 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 purpose of this audit, emphasis has been placed on student records not otherwise covered in these other OUA audits.

BACKGROUND

The main student recordkeeping systems on the CSU campuses are automated databases supported on the 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		
Hayward	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. The current PeopleSoft implementation schedule has not 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. Hayward is in the first wave of campuses and expects to have

PeopleSoft fully operational in 2003.

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

Student records and registration at Hayward is the responsibility of the assistant vice president of enrollment services, who reports to the vice president for academic affairs.

The automated system for student recordkeeping at Hayward is the Student Information System Plus (SIS+) from Systems & Computer Technology (SCT) Corporation that runs on an IBM mainframe computer at California Polytechnic State University, San Luis Obispo. SIS+ was implemented in January 1996. It contains the records of students who have enrolled since January 1990.

Registration at Hayward is predominantly accomplished directly by students through a telephone-based system – Student Administrative Information Link On-line Registration (SAILOR).

OPINION

We visited the campus from May 24 to June 25, 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; and
- 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 in place. However, control over access to the student record system was in need of improvement. As described

further in the report, there was some concern about maintaining the confidentiality of student information. Additionally, improved control procedures for grades and grade changes are needed.

Areas that we feel warrant the attention of management are addressed 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 [7]

BIENNIAL REVIEWS [7]

The campus had not been conducting biennial reviews of information management practices concerning student records. The use of biennial reviews reduces the risk of inappropriate information practices concerning student records.

TRANSCRIPT CONTROLS [7]

Transcript controls were inadequate. Adequate accounting and control of cash collections reduces the risk that misappropriation of funds will not be detected.

TRANSCRIPT FEE RECONCILIATIONS [8]

Reconciliations of transcripts issued and transcript revenue were not prepared. Timely reconciliations of transcripts issued and transcript revenue decrease the risk that errors and irregularities will not be detected.

INFORMATION DISCLOSURE [9]

Confidential student information was inappropriately distributed. Establishing adequate control procedures for distribution of non “directory information” reduces exposure to potential FERPA violations.

GRADES [10]

INCOMPLETE "I" DOCUMENTATION [10]

Documentation for "I" grade extensions was inadequate. Capturing "I" grade documentation would complete the student record.

GRADE CHANGES [11]

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

STUDENT PARTICIPATION [12]

In the three 1998/99 petitions granted a hearing panel by the academic fairness committee, the student member participated in the assignment of new grades. Precluding student participation ensures that the rights and responsibilities of faculty and students are properly recognized and protected.

ACADEMIC RENEWAL [12]

Safeguards against academic renewal of grades assigned as a result of academic dishonesty were inadequate. Establishing adequate controls and procedures would ensure that grades assigned from academic dishonesty cases would not be converted in the academic renewal process.

DATA CONTROL, SECURITY & INTEGRITY [13]

RECORD DISPOSITION [13]

The campus was unaware of all student record reports and disposition of distributed data. Addressing the disposition of these protected student records reduces exposure to unauthorized access and disclosure and potential FERPA violations.

CLEARANCE PROCESS [14]

SIS+ access privileges for separating employees were not rescinded in a timely manner. Timely deletion of computer access in the clearance process reduces exposure to unauthorized access and disclosure and potential FERPA violations.

REGISTRATION [14]

WITHDRAWAL PROCESS [14]

Controls over the withdrawal process were in need of improvement. Strengthening such controls reduces the likelihood for errors and irregularities.

THIRD PARTY AGREEMENTS [15]

Written agreements between the campus, subsidized students, and third party payers of tuition and other fees did not expressly state that the subsidized students were liable for any unpaid fees. Written agreements between the campus and other parties, delineating promises and considerations from both sides decreases the potential for misunderstandings.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORD POLICY ADMINISTRATION

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 information management practice 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 vice president, administration and business affairs stated that some of the review areas were discussed; however, nothing was documented.

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

Recommendation 1

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

Campus Response

The Campus will perform biennial review of its student information systems practices concerning student records. Anticipated Completion Date: July 30, 2000

TRANSCRIPT CONTROLS

Transcript controls were inadequate.

We found that:

- responsibilities for transcripts were not sufficiently segregated, as the transcript agent received cash receipts, recorded transactions in the log, and issued transcripts;
- transfer accountability of cash receipts was not established; and
- checks were retained for an average of two weeks and were not restrictively endorsed until transferred to the central cashier.

SAM §20003 states that a satisfactory system of internal accounting and administrative control includes a plan of authorization and recordkeeping procedures adequate to provide effective accounting controls over assets, liabilities, revenues, and expenditures.

SAM §8080.1 states that no one person will perform more than one of the following duties: receiving remittances, inputting receipts information, and maintaining records file.

SAM §8023 requires that all checks, money orders, and warrants received for deposit will be restrictively endorsed for deposit as soon as practicable after receipt, but no later than the end of the working day.

SAM §8021 states that a separate series of transfer receipts will be used to localize accountability for cash or negotiable instruments to a specific employee from the time of its receipt to its deposit.

The registrar indicated that she was not aware of the requirements regarding endorsements, transfer accountability, and separation of duties.

Inadequate accounting and control of cash collections and deposits increases that risk that misappropriation of funds may not be detected.

Recommendation 2

We recommend that the campus take the following actions with respect to transcript operations:

- a. segregate transcript responsibilities;
- b. restrictively endorse checks and negotiable instruments on the day of receipt; and
- c. implement procedures to localize accountability for transcript cash receipts.

Campus Response

The campus will separate transcript duties, restrictively endorse checks, and implement check transmittal documentation procedures between departments. Anticipated Completion Date: July 30, 2000

TRANSCRIPT FEE RECONCILIATIONS

Reconciliations of transcripts issued and transcript revenues were not prepared.

SAM §20003 requires an effective system of internal control that would include regular reconciliations of transcripts issued to transcript fees collected.

The assistant vice president of enrollment services indicated that she was not aware that transcript reconciliations are required.

Failure to reconcile transcript fees with transcripts issued increases the risk that errors and irregularities will not be detected.

Recommendation 3

We recommend that the campus prepare timely reconciliations of the transcripts issued and transcript fees collected.

Campus Response

The campus will prepare timely reconciliations of the transcripts issued and transcript fees collected.
Anticipated Completion Date: July 30, 2000

INFORMATION DISCLOSURE

Confidential student information was inappropriately distributed.

Non “directory information” such as ethnicity was released without prior student authorization.

Section 99.31(a)(11) of Family Educational Rights and Privacy act allows the distribution of student record information if it has been designated as “directory information” of it is released to “school officials” with a “legitimate educational interest.”

The registrar indicated that non “directory information” had been released because the campus policy for releasing information requested by internal departments on behalf of third parties was not strictly enforced.

In the absence of student authorizations, distribution of non “directory information” increases exposure to potential FERPA violations.

Recommendation 4

We recommend that the campus improve efforts to enforce a formal policy regarding disclosure of personally identifiable information from student records.

Campus Response

The campus will develop procedures to enforce a formal policy regarding disclosure of personally identifiable information from student records. Anticipated Completion Date: July 30, 2000

GRADES

INCOMPLETE "I" DOCUMENTATION

Documentation regarding Incomplete (I) grade extensions was inadequate.

Seven percent (3 of 46) of the Fall 1998 incomplete grades were extended two additional terms beyond the customary one term, and documentation was not provided. Such extensions require express approval from the instructor and the department and must be submitted to the records office.

Executive Order 268 states:

An incomplete shall be removed within one year following the end of the term during which it was assigned; provided, however, that extension of the one-year time limit may be granted by petition for contingencies.

The 1998-2000 catalog at Hayward elaborates on the extension provisions as follows:

You may be able to receive up to two one-quarter extensions from the department. These extensions are for cause and must be approved by both your instructor and department chair. (Examples of cause include military service, serious health or personal problems, or instructor's leave of absence.)

The registrar stated that the extension documentation could not be located.

Without appropriate "I" extension documentation, there is an increased risk that the integrity of the incomplete grading process could be compromised.

Recommendation 5

We recommend that the campus strengthen procedures to ensure that all incomplete extensions are properly documented.

Campus Response

Faculty and department chairs will be formally notified of procedural changes that ensure proper documentation for all extensions. Anticipated Completion Date: July 30, 2000

GRADE CHANGES

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

We found that:

- grade change forms are usually sent to the records office from the department via inter-campus mail and the confirmations are sent back from the records office to the departments, which does not ensure security;
- grade change forms were sent to the records office, and the turnaround documents were not consistently tracked by the departments;
- signatures of faculty on grade change forms were not verified to signature cards; and
- there was no monitoring of grade changes to ensure adequate security of grade change access and to assure that campus staff was not accessing and making grade changes to their own records.

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

The assistant vice president of enrollment services indicated that, due to the volume of grade changes submitted, faculty signatures were not consistently verified.

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

Recommendation 6

We recommend that the campus:

- a. establish controls and procedures for receiving and handling grade changes;
- b. establish controls and procedures for confirming grade changes; and
- c. instruct records office management to obtain and periodically review grade change summary reports.

Campus Response

The campus will establish controls and procedures for processing grade changes and will instruct records office management to obtain and periodically review grade change summary reports. Anticipated Completion Date: July 30, 2000

STUDENT PARTICIPATION

In the three 1998/99 petitions granted a hearing panel by the academic fairness committee, a student member participated in the assignment of new grades.

EO 320 requires provision of one or more committees for hearing grade appeals which shall provide safeguards to assure due process for both student and instructor. Such committee shall include student membership. Student members shall not participate in assignment of grades.

The assistant vice president of instructional services indicated that the student association has requested student representation in grievance cases regarding grade revisions.

Allowing student participation in the assignment of new grades is not in accordance with systemwide policy.

Recommendation 7

We recommend that the campus revise its academic fairness committee procedures to preclude students from participating in the assignment of grades.

Campus Response

Students will no longer be able to participate in the assignment of grades by the academic fairness committee. Anticipated Completion Date: March 31, 2000

ACADEMIC RENEWAL

Safeguards against academic renewal of grades assigned as a result of academic dishonesty were inadequate.

Three offices are involved in academic renewal and academic dishonesty cases: Academic renewal petitions are processed through the admissions and records office, and academic dishonesty reports are filed by the instructor at the provost's office. Potentially, cases could be processed through both offices and not be coordinated in a manner necessary to preclude academic renewal of dishonesty cases.

The campus policy on academic renewal, as described in the 1998/2000 catalog, states that "academic renewal cannot be approved for any grade assigned as a result of academic dishonesty."

The registrar indicated that she was not aware that academic renewal could not be granted for a grade upon which the instructor has filed an academic dishonesty report at the provost's office. Her office had no information on the academic dishonesty report filed and, hence, academic renewal could be granted per student request or at the time of graduation.

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

Recommendation 8

We recommend that the campus review and strengthen internal controls to ensure that academic renewals are not approved for grades assigned as a result of academic dishonesty.

Campus Response

The campus will revise its procedures to ensure that academic renewals are not approved for grades assigned as a result of academic dishonesty. Anticipated Completion Date: September 30, 2000

DATA CONTROL, SECURITY & INTEGRITY

RECORD DISPOSITION

The campus was unaware of all student record reports and disposition of distributed data. While FERPA training is initially provided for access to student records, there is not a systematic follow-up with recipients/users to refresh and update them on continuing security expectations.

The central automated database for student records (SIS+) is used in various ways to download data and produce extracts that transfer protected student information to other campus locations and computers. There is also a data warehouse of student records. A history of reports generated and information extracted from the data warehouse is not maintained. Disposition of data released outside the central student records office is not monitored.

The revised 1998 AACRAO publication entitled *Guidelines for Postsecondary Implementation of the Family Educational Rights and Privacy Act of 1974 as Amended* states:

An institution should make clear in its FERPA policy that disclosure to a school official having a legitimate educational interest does not constitute authorization to share that information... Such information, when it has fulfilled its originally specified purpose, should be destroyed or returned to the originating office for appropriate disposition.

According to director of information systems, the campus cannot create and retain a computer-generated log of distributed data because it consumes too many resources. The director of information systems also indicated that they do not have the personnel to follow-up on the disposition of distributed data.

Not monitoring the disposition of distributed student records nor addressing potential problems through alternative means increases exposure to risk of unauthorized access and disclosure and potential FERPA violations.

Recommendation 9

We recommend that the campus develop a plan to secure distributed student record information after it has fulfilled its original purpose.

Campus Response

FERPA training for online and warehouse users will be modified to include instructions regarding the disposition of distributed student record information after it has fulfilled its original purpose. All current users will be instructed regarding the disposition of distributed student record information. Anticipated Completion Date: July 30, 2000

CLEARANCE PROCESS

The SIS+ access privileges for separating employees were not rescinded in a timely manner.

Two employees who recently separated from campus employment continued to have authorized access to SIS+ after their separation. Their access was not turned off even though the computer services sections in the clearance forms had been signed off.

The director of data center and network operations indicated that, when an employee is terminated, the current policy is to deny computer access in the clearance process.

Improper sign-off of the computer services section in the clearance form prior to delivery of the final paycheck increases the risk of improper access of protected student information and exposes the campus to potential FERPA violations.

Recommendation 10

We recommend that the campus strengthen controls to ensure timely rescission of computer access for separating employees.

Campus Response

The campus will strengthen controls to ensure timely rescission of computer access for separating employees. Anticipated Completion Date: March 31, 2000

REGISTRATION

WITHDRAWAL PROCESS

Controls over the withdrawal process were in need of improvement.

Specifically, we found that:

- academic departments inappropriately approved withdrawals after the add/drop deadline;
- Student/Administrative Information Link On-line Registration (SAILOR) was not disconnected in a timely manner, thus enabling students to withdraw classes after the add/drop deadline;
- one withdrawal form was not signed by an authorized signer; and
- the registrar's office was not systematically monitoring withdrawals initiated in other departments.

SAM section 20003 states that internal control is an internal check, to facilitate the achievement of management objectives, by serving as checks and balances against unauthorized and undesired actions. The ultimate responsibility for good internal control rests with management and should be recognized as an integral part of each system that management uses to regulate and guide its operations.

The registrar indicated that the academic departments were regularly reminded not to withdraw students after the add/drop deadlines. Also, the campus has recently generated edit reports that allow management in the records office to monitor the withdrawals.

Inadequate controls over withdrawal process limit the campus' ability to detect errors and irregularities.

Recommendation 11

We recommend that the campus review and strengthen withdrawal procedures to ensure compliance with established deadlines and other internal control requirements.

Campus Response

To ensure compliance with established deadlines and other internal control requirements, the registrar's office will systematically monitor withdrawals initiated in other departments and the on-line registration system will be disconnected at the end of the add/drop deadline. Anticipated Completion Date: September 30, 2000

THIRD PARTY AGREEMENTS

Written agreements between the campus, subsidized students and third party payers of tuition and other fees (i.e. California department of rehabilitation) did not expressly state that the subsidized students were liable for any unpaid fees.

SAM §20003 states that a satisfactory system of internal accounting and administrative control includes a plan of authorization and record keeping procedures adequate to provide effective accounting controls over assets, liabilities, revenues, and expenditures.

The accounts receivable manager indicated that such liability was clearly understood by students, however, if this understanding were litigated, the campus' rights could not be clearly established.

Not having a written agreement between the campus and other parties, delineating promises and considerations from both sides, increases the potential for misunderstandings.

Recommendation 12

We recommend that written agreements between the campus, subsidized students, and third party payors of tuition and other fees expressly state that the subsidized students are liable for any unpaid fees.

Campus Response

In the printed class schedule and on-line catalog, the campus has disclosed the liability of subsidized students for any unpaid fees. Anticipated Completion Date: Completed

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Norma S. Rees	President
Mariko Abe	Administrative Support Coordinator, Music Department
Michelle Barreiro	Clerical Assistant, School of Arts
Carl Bellone	Interim Assistant Vice President, Enrollment Services
Yvonne Brandenburg	Accounts Receivable Manager
Ann Cambra	Coordinator, Department of Statistics
Frank Correia	Director, Data Center & Network Operations
Kathryn Dulkie	Office Manager, Department of Accounting
Donna Gill	Student Record Coordinator
Bonnie Guiomar	Payroll Officer
Sandy Heisey	Associate Director, Assessment & Testing
Judy Heisler	Registration Assistant
Juanita Higaes	Registration Coordinator
JoAnne Hill	Benefits Manager, Human Resources
Mary Hootman	General Accounting & Financial Reporting Manager
Mary Hubins	Registrar
Betty Huff	Assistant Vice President, Enrollment Services
Neal Hoss	Controller
Vernon Kam	Chair, Department of Accounting
Ed Keller	Chair, Department of Mathematics and Computer Science
Mack Lovett	Assistant Vice President, Instructional Services
Kent McKinney	Director, Information Systems
Louise Martinez	Transcript Coordinator
Richard Metz	Vice President, Administration & Business Affairs
Sandra Moniz	Director, Student Data Systems
Jeannette Monroe	Supervisor, Graduation and Evaluation
Gladys De Necochea	Vice President, Student Affairs
Dana Martin Newman	Associate Chair, Teacher Education
Leone Nidiffer	Assistant Vice President, Institutional Research & Analysis
Julia A Norton	Chair, Department of Statistics
Jennifer Rice	Program Assistant, Graduate Programs
Sueann Seeley	Administrative Support Assistant I, Department of Mathematics and Computer Science
Denise Sullivan	Evaluator, Business & Enrollment Student Service Center
Richard Walls	Director, Information Systems - California Polytechnic State University, San Luis Obispo