

STUDENT RECORDS & REGISTRATION
CALIFORNIA STATE POLYTECHNIC
UNIVERSITY POMONA

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ABBREVIATIONS

AACRAO	American Association of Collegiate Registrars and Admissions Officers
CSU	California State University
CSPU	California State Polytechnic University
EO	Executive Order
FERPA	Family Education Rights and Privacy Act
OUA	Office of the University Auditor
PRs	Permanent Records
SAM	State Administrative Manual
SCT	System and Computer Technology
SIS+	Student Information System Plus
SP	Satisfactory Progress – an administrative grading symbol authorized by EO 268
VR	Voice Response

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 period 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, 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 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	SIMS/R	SIS Plus	Champlain
Bakersfield	Fresno	Chico	Maritime Academy
Dominguez Hills	Northridge	Fullerton	
Humboldt	San Diego	Hayward	
Monterey Bay	San Francisco	Long Beach	
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. 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 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

Student records and registration at the California State Polytechnic University, Pomona (CSPU Pomona) campus is the responsibility of enrollment services. Student records and registration is supervised by a registrar, who reports to the senior director of enrollment services. The senior director of enrollment services reports to the vice president for student affairs.

The automated system for student recordkeeping at CSPU Pomona is the Banner Student Information System from SCT Corporation, which runs on an IBM mainframe computer.

Registration at the CSPU Pomona campus is predominantly accomplished by students through a telephone-based system – Voice Response (VR) system. VR system is augmented by manual registrations.

OPINION

We visited the campus from August 23, 1999 to September 3, 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. However, within the centralized student records area, 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 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 [7]

BIENNIAL REVIEWS [7]

The campus had not been conducting biennial information manage practice reviews concerning student records. Such reviews help to ensure that student records are appropriate.

STUDENT RIGHTS STATEMENT [7]

References to building locations and phone numbers in the “Statement of Student Rights, Responsibilities and Grievance Procedures” were not current. Updating these references would enhance the usefulness of the document.

STUDENT RECORDS [8]

Protected student information was released without prior student approval. Controlling the distribution of confidential student information decreases exposure to FERPA violations.

FEES [9]

Internal control weaknesses were found in the handling of subpoena and transcript fees. Adequate control of check collections decreases the risk that misappropriation of funds will not be detected.

RECONCILIATION [10]

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

GRADES [11]

GRADE/GRADE CHANGE CONTROLS [11]

Overall grades/grade change controls were inadequate. Enforcing grading controls provides an additional measure of protection against student record inaccuracies.

AUDIT RECORD [12]

The campus does not retain an adequate audit trail of registration activities. Retaining the registration information visible to the operators decreases the risk that the integrity of the database will be compromised.

“SP” DOCUMENTATION [13]

Documentation supporting student satisfactory progress “SP” grade extensions was not adequate. Capturing “SP” extension documentation completes student records.

ISSUES RELATING TO GRADE APPEAL COMMITTEES [14]

There is neither campus-wide policy on the assembly of grade appeal committees, including student membership, nor annual reporting of grade appeals. A campus-wide policy regarding the formation of grade appeal committees reduces ambiguity on the grade appeal process. Adequate student participation on these committees reduces the possibility of unfair review practices.

WITHDRAWALS [16]

Withdrawals in the last three weeks of the quarter did not meet the “ordinarily” requirement stated in Executive Order (EO) 268. Campus controls over withdrawals would improve with appropriate policy implementation.

DATA CONTROL, SECURITY & INTEGRITY [17]

DISASTER RECOVERY [17]

The records office had not developed a disaster recovery plan (except for electronic data which was included in the Information Technology disaster recovery plan). Developing and testing such a plan decreases the risk of loss in the event of a disaster.

COMPUTER SYSTEM ACCESS [18]

The campus does not systematically review the banner accounts for appropriate authorization and revoke computer access of terminated employees in a timely manner. Systematic reviews and timely revocation reduces exposure to improper access and disclosure and potential FERPA violations.

FERPA TRAINING [19]

Banner users were not provided FERPA training prior to being granted access to the system. Providing FERPA training to banner users decreases the risk of inappropriate disposition of sensitive student information.

TRANSCRIPT REQUEST RETENTION [19]

The campus did not adequately retain transcript requests. The availability of original request documents improves the campus transcript controls.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORD POLICY ADMINISTRATION

BIENNIAL REVIEWS

The campus was not conducting biennial information management practice reviews concerning student records.

Executive Order (EO) 382, *Privacy and Personal Information Management, Student Records Administration*, with an effective date of March 10, 1982, requires the campus to establish procedures for reviewing the campus 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 registrar indicated that they had not conducted a formal review, as one had not been requested by the Chancellor's office.

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

Recommendation 1

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

Campus Response

We concur with the recommendation. February 2000, we formed a Biennial Review committee with representatives from Academic Resources, Planning & Administration, Faculty, Financial Services, Public Affairs, Student Affairs and Student Support. The committee will review campus information practices concerning student educational record standards to ensure consistency with the federal Family Education Rights and Privacy Act of 1974 and Executive Order 382. The committee will conclude this review by June 1, 2000 with the results forwarded to Chancellors Office.

STUDENT RIGHTS STATEMENT

References to building locations and phone numbers in the "Statement of Student Rights, Responsibilities and Grievance Procedures" were not current.

Executive Order 382 indicates that the campus policy statement should include a list of the types of student records maintained and the titles and addresses of the officials responsible for maintaining them. It is reasonable to expect these lists to be up to date.

The interim director of judicial affairs acknowledged that references in the statement were outdated.

The “Statement of Student Rights, Responsibilities and Grievance Procedures” would not be useful if the information contained is outdated.

Subsequent to the audit fieldwork, the campus provided an updated Statement of Student Rights, Responsibilities and Grievance Procedures.

STUDENT RECORDS

Protected student information was released without prior student approval.

The campus was completing requests for non-directory, student information based upon such factors as ethnicity and national origin, without obtaining permission from the student. This information was submitted to faculty members representing the clubs and associations as advisors. In the absence of prior disclosures in a published EO 382 policy statement, there are questions as to whether clubs and associations are “school officials” and whether they have a legitimate educational interest.

Executive Order (EO) 382, *Privacy and Personal Information Management, Student Records Administration*, with an effective date of March 10, 1982, states that each campus may disclose, but is not compelled to disclose, personally identifiable information from a student record to any authorized outside party designated by this Executive Order. FERPA sections 99.31, 99.34, and 99.36 state that each campus shall obtain written consent of the student before disclosing personally identifiable information from the student record except as provided by FERPA sections 99.30 and 99.31.

The interim director of institutional research and planning indicated that the requested sensitive student information is released if an employee agrees to take responsibility for the data.

By not controlling protected student information, there is an increased risk of disclosure and FERPA violations.

Recommendation 2

We recommend that the campus improve procedures to ensure that protected student information is not released without prior student approval.

Campus Response

We concur with the recommendation. We will address the issue of procedures to protect student information during the Biennial Review scheduled March 1 - June 1, 2000.

FEES

Internal control weaknesses were found in the handling of transcript and subpoena fees.

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;
- ▶ checks for transcript fees were held in an unsecured location prior to being transmitted to the central cashier; and
- ▶ checks for subpoena fees were not restrictively endorsed.

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 §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.

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 §8032.1 states that when funds are not in use, they will be locked in a desk, file cabinet, or other mechanism providing comparable safekeeping.

The registrar indicated that she was not aware of these weaknesses. The campus has recently revised its procedures to address the issues noted. These procedures have not been reviewed.

Inadequate accounting and control of cash collections and deposits increase the risk that misappropriation of funds may go undetected.

Recommendation 3

We recommend that the campus:

- a. segregate responsibilities for transcript operations;
- b. hold checks in a secured location;
- c. implement procedures to localize accountability for transcript cash receipts; and
- d. restrictively endorse checks and negotiable instruments be restrictively endorsed on the day of receipt.

Campus Response

We concur with the recommendation. We now have procedures in place to strengthen the handling of subpoena and transcript fees.

In September 1999, procedures implemented for subpoena fee processing were: photocopying of each subpoena check at Student Affairs before forwarding to Student Accounting and Cashiers, restrictive endorsement of check, retention in a locked drawer, and signing of the check batch transmittal by Student Accounting and Cashiers to acknowledge receipt. The checks are transferred daily to Student Accounting and Cashiers. The photocopy is filed with the subpoena request at Student Affairs.

The Registrar's Office implemented procedures in September 1999 that designate different staff members for processing transcript requests, monies and issuance of transcripts. The checks are restrictively endorsed and retained in a locked file until transfer via daily cash receipt log to Student Accounting and Cashiers.

RECONCILIATION

Reconciliations of transcripts issued to transcript revenues were not prepared. SAM §20003 requires an effective system of internal control that includes regular reconciliations of transcript issued to transcript fees collected.

The executive director of finance and administrative services indicated that the lack of reconciliation was due to the limitation of the Banner system. The campus is working on establishing reconciliation schedules.

Without transcript fee reconciliations, there is an increased risk of errors and irregularities.

Recommendation 4

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

Campus Response

We concur with the recommendation. In order to compile data on transcripts issued for a fee from the SCT Banner system, we will use a data field on the transcript request screen to record the transcript fee information. To minimize modification of software, we will extract and summarize transcript production information using SQL.

The independent information on transcripts issued will be reconciled to the transcript revenue database in the student accounts receivable system. Since the approach we are taking is prospective, we expect the first reconciliation to be performed for the period April 1 to June 30, 2000. This reconciliation will be completed by August 18, 2000. Thereafter, the reconciliation will be performed on an annual basis.

GRADES

GRADE/GRADE CHANGE CONTROLS

Overall grades/grade change controls were not adequate.

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

- ▶ grade change forms are generally sent to the records office from the department via inter-campus mail and the confirmations are sent back from the records office to the department in the same manner, neither of which is secured;
- ▶ grade change forms sent to the records office and turnaround documents were not tracked by the departments;
- ▶ signatures of faculty on grade, grade change, and withdrawal forms were not verified;
- ▶ in one instance, a grade change was performed inappropriately using another user account; and
- ▶ there was no monitoring of grade changes by management to assure: adequate security of grade change access; that campus staff was not accessing and making grade changes to their own records; and withdrawals were done by appropriate personnel.

Good internal controls over grades and grade changes should include measures to ensure that only authorized grades or grade changes are posted to student records.

The registrar indicated that faculty signatures were not verified due to the volume of grade rosters, grade change forms, and withdrawal forms submitted. Likewise, the monitoring and tracking of grade

changes were not performed due to the volume of grade changes processed. She also stated that the transmission of the documents via inter-campus mail was done for convenience purposes. In the instance when the grade change was made using another user account, this was an oversight.

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

Recommendation 5

We recommend that:

- a. the campus strengthen controls and procedures for receiving and handling grades, grade changes, and withdrawals;
- b. the campus strengthen controls and procedures for confirming grade changes; and
- c. records office management obtain and periodically review grade change summary reports.

Campus Response

We concur with the recommendation. We will work with the Associate Deans to strengthen handling and processing procedures and controls. The Registrar's Office will request that the Associate Deans designate an individual in each college to: 1. Coordinate grade changes, 2. Verify faculty signatures, and 3. Maintain a log of grade change forms sent to and received from the Registrar's Office. The Registrar's Office will continue to number and log the distribution of grade change forms.

By June 1, 2000 the Registrar's Office will complete a project with Enterprise Computing to obtain grade change summary reports. The quarterly reports will be used to monitor grade change access and change by user ID and date to ensure that only authorized grades are posted to student records.

AUDIT RECORD

The campus does not retain an adequate audit trail of registration activities.

During our review, we noted that the identification of the user performing the registration transaction was not stored in the system.

The American Association of Collegiate Registrars and Admission Officers (AACRAO), *Student Record Management – A Handbook*, 1997, states that the database and security systems should be used to define the type of audit record that needs to be generated and who needs to receive that audit record. An audit record is a trail of changes to a data item and should contain at minimum the before/after image of the data, the identity of the user making the change, the location of the device

from which the change was made, and the date and time of the change. It is an element of the software security used to help protect the integrity of a database.

The data base administrator indicated that the operator identification information is lost when the registration transactions are rolled over from the registration module to the academic module.

Without an adequate audit trail, the integrity of the database could be compromised.

Recommendation 6

We recommend that the campus review its current system to address the retention of the operator identification.

Campus Response

We concur with the recommendation. When the audit occurred, we were in the process of developing a means to retain a history of registration changes to protect the data integrity. We now have procedures in place to retain an audit trail within the student database. Beginning August 1999, we implemented a system to retain a historical record of registration activity. Data retained and available for audit include: term, ID, course, CRN, level, add date with activity date, registration status, registration status date, error flag message, billing hours, credit hours and user id. By August 31, 2000 we will have the ability to query on the record of an individual student or a group of students.

"SP" DOCUMENTATION

Documentation supporting student satisfactory progress "SP" grade extensions was not adequate.

The campus does not maintain extensions for "SP" grades granted over one year. Thirty three percent (8 of 24) of the Fall 1997 "SP" grades reviewed were extended beyond one calendar year of the date of assignment with no extension authorization.

The campus catalog states that:

The SP symbol is used in connection with courses that extend beyond one academic quarter. The symbol indicates that work in progress has been evaluated as satisfactory to date but that the assignment of a precise grade must await completion of additional coursework. All work is to be completed within one calendar year of the date of the first assignment of SP and a final grade will be assigned to all segments of the course on the basis of overall quality. Any extension of this time period must receive prior authorization by the advisor, department chair, and college dean on a General Academic Petition.

The lead specialists indicated that they have processed grade change requests without prior authorization for the extensions. They honor faculty requests and provided expedited help to the students.

Not maintaining an adequate review and approval process for SP extensions increases the risk of record inconsistencies and errors.

Recommendation 7

We recommend that the campus strengthen procedures to ensure that adequate review and approval processes for SP extensions are in effect and that appropriate documentation is maintained.

Campus Response

We concur with the recommendation. We will refer the SP extension processes to the Academic Senate for review. We will request consideration of the following alternatives: 1. A statement indicating that there will be no exceptions to expired SP grades, or 2. Senate approved parameters under which SP extension exceptions may be made. We will request a review and new procedures in place by June 1, 2000.

ISSUES RELATING TO GRADE APPEAL COMMITTEES

There is neither campus-wide policy on the assembly of grade appeal committees, including student membership on these committees, nor annual reporting of grade appeals. The department chair or college dean decides on the formation of the committee. Also, there is no student participation in the grade appeal committees. Members of the grade appeal committees consist of faculty selected by the department chair or college dean.

Executive Order (EO) 320, *Assignment of Grades and Grade Appeals* dated January 18, 1980, requires each campus to implement policies that: include one or more committees for hearing grade appeals; and provide safeguards to assure due process for both student and instructor. Such committee shall include student membership. The campus shall also make provisions for annual reporting to the president and the faculty senate/council on the number of grade appeal cases heard and the disposition of each case.

The associate vice president of academic programs indicated that there is no campus-wide procedure on the formation of the grade appeal committees. The department chairs or college deans form the committees. He also indicated that the departments and colleges consider the grade appeals to be departmental issues that need to be settled internally. Department chairs or college dean select the members of the committee. The associate vice president of academic programs indicated that he was not aware of the annual reporting requirements on grade appeals.

The absence of a campus-wide policy on the grade appeal committees creates ambiguity on the grade appeal process. Not having appropriate student representation on the grade appeal committees decreases the likelihood that student and faculty members are given due process. The absence of annual reports from the committee reduces management effectiveness and management overview of the grade appeal process.

Recommendation 8

We recommend that the campus:

- a. establish campus-wide procedures on the formation of the grade appeal committees;
- b. establish procedures to ensure appropriate student representation in the grade appeal committees;
and
- c. prepare and submit annual grade appeal reports as required.

Campus Response

We concur with the recommendation. A referral is being prepared and will be submitted to the Academic Senate by February 15, 2000. The referral requests the AS to review the current campus policy for Grade Appeals and develop procedures for establishing college and/or university grade appeal committees, which include student members nominated by the Student Government (ASI). We expect the Senate to develop the procedures and transmit its recommendations to the President by June 2, 2000. The plan is to complete the process of establishing standing grade appeal committee(s) by July 10, 2000.

The referral suggests that if all informal efforts fail, the student may file a formal appeal to the Dean or Associate Vice President for Academic Programs requesting that his/her case be presented to the college or university grade appeal committee. The policy will define the extent of authority of grade appeal committee(s), including provisions, which clearly limit grade changes to instances where there is a finding that the grade was improperly assigned and that student members shall not participate in assignment of grades. It will also establish procedures and timelines for annual reporting to the President and the Academic Senate on the number of cases heard by grade appeal committees and the disposition of each case.

WITHDRAWALS

Withdrawals in the last three weeks of the quarter did not meet the “ordinarily” requirement stated in Executive Order (EO) 268.

Thirty-six percent (14 of 39) of withdrawals in the last three weeks of fall 1998 that we tested were total withdrawals from the campus. The remaining withdrawals - sixty-four percent (25 of 39) consisted of students dropping individual courses but not withdrawing from the university.

Section 5 of EO 268 describes withdrawals in the last three weeks of instruction as follows:

Ordinarily, withdrawals of this sort will involve total withdrawal from the campus, except that credit or an Incomplete may be assigned for courses in which sufficient work has been completed to permit an evaluation to be made.

The associate registrar indicated that the campus complies with EO 268, in that the withdrawals were due to circumstances clearly beyond the student’s control.

Allowing students to drop specific classes instead of completely withdrawing in the last three weeks of instruction compromises the integrity of the process, weakens the justification, and establishes a precedence for abuse and excessive activity.

Recommendation 9

We recommend that the campus develop and implement a withdrawal policy which meets systemwide guidelines.

Campus Response

We concur with the recommendation. A referral will be submitted to the Academic Senate and a revised policy, which conforms to the recommendation, will be requested. The revision should be in effect no later than October 2000. In the interim the Deans and Associate Deans of the University will be asked to minimize any variations from the recommended policy interpretation. At the same time, we wish to address the following concerns:

The current application of a withdrawal policy written in the 70s and applied thirty years later must be reconsidered. There are two very compelling arguments. First, the students enrolled in the 70s and 80s were often not working students. More than 70% of our students work during the week. Changes in work times or childcare or other related responsibilities make it appropriate for a student to withdraw from a course with valid documentation during the last three weeks, but not from every course in his or her schedule. To do so violates the very spirit of the Chancellor's injunction to move students through to graduation. Second, the policy governing the last three weeks of instruction is biased in favor of the semester campuses. Withdrawing after completing 12 weeks of work (80%) on a semester campus is

certainly more last minute and serious than withdrawing after 7 weeks (70%) of work on a quarter campus. The intent of the withdrawal policy is to deter withdrawal after census, which would misrepresent campus productivity and encourage students to drop capriciously in and out of courses. The policy should require students to provide ample evidence of matters beyond the student's control, but it should not require the student to drop all other courses when it is not necessary to do so.

We continue to feel that the system-wide guidelines should be changed.

DATA CONTROL, SECURITY & INTEGRITY

DISASTER RECOVERY

The records office had not developed a disaster recovery plan for documents. Electronic data is covered in the Instructional and Information Technology division disaster recovery plan.

The American Association of Collegiate Registrars and Admissions Officers (AACRAO), *Guidelines for Retention and Disposal of Student Records*, 1998 Update, states that records managers must take appropriate measures to reduce the vulnerability of records to loss and alteration through human error, natural disaster, fire and water, sabotage, accident, negligence, fraud or technological obsolescence.

The registrar stated that she was aware of the need for a disaster recovery plan. However, she is working on developing such a plan.

Not taking adequate protective measures exposes the campus to the risk of loss of irreplaceable student records information.

Recommendation 10

We recommend that the campus develop a disaster recovery plan specifically for the records office to ensure that student records are adequately protected and recoverable.

Campus Response

We concur with the recommendation. All but 350,000 student records are electronically maintained and protected in the Instructional and Information Technology Division Disaster Recovery Plan. To ensure that student records are adequately protected and recoverable, we will use the recently purchased and installed imaging system to scan and electronically retain the 350,000 records. Completion of this imaging project is scheduled for August 31, 2000.

COMPUTER SYSTEM ACCESS

The campus does not systematically review the banner accounts for appropriate authorization. Employees who change positions can carry forward the banner profile from their old job even though it may no longer be appropriate to their new duties. In addition, the current clearance process did not result in revocation of computer access.

SAM §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.

SAM §4841.5 defines that one of the responsibilities of an agency unit that is the designated owner of an automated file or data base consists of defining precautions for controlling access to and preserving the security and integrity of files and data bases that have been classified as requiring such precautions.

The data base administrator indicated that an employee's banner profile is not changed because he is not notified when an employee is transferred or separates employment.

Lack of continual review of banner account profiles and untimely revocation of computer access of employees separating from employment increases the risk of improper access of protected student information.

Recommendation 11

We recommend that the campus:

- a. establish procedures to periodically review the authorized access of banner users; and
- b. initiate procedures to include revocation of computer access as part of the clearance process.

Campus Response

We concur with the recommendation. Personnel from the Registrars Office, Enterprise Computing, Human Resources, Academic Affairs, and Student Affairs met in January 2000 and will review BANNER access by all users each quarter, when the employee leaves the University or changes positions within the University.

FERPA TRAINING

Banner users were not provided FERPA training prior to being granted access to the system.

American Association of Collegiate Registrars and Admissions Officers (AACRAO), *Expectations, and Tasks for the 90's Report. Report of the Task Force of the 90's*, 1988 emerging issues, indicates that in addition to receiving requests and granting appropriate access to the information, the authorizer should have responsibility for training the user. The training process should also include discussion of the issues of confidentiality and security of the information.

The data base administrator indicated that FERPA training was supposed to be the responsibility of the user's supervisor. The administrator thought that the training was being done and there was no follow-up or verification. On the account request form, the requester agrees to use the information only for authorized purposes.

When system users are not given proper FERPA training, the risk of inappropriate use of protected student information and FERPA violations is increased.

Recommendation 12

We recommend that the campus initiate and document FERPA training prior to authorizing user access.

Campus Response

We concur with the recommendation. The campus will introduce regular employee training for relevant employees on FERPA policy and regulations effective with September 2000. This training will be included as part of the staff and faculty orientation programs and will be updated periodically at the discretion of the manager of each unit.

TRANSCRIPT REQUEST RETENTION

The campus did not adequately retain transcript requests. Such requests were shredded three months after the date of request.

American Association of Collegiate Registrars and Admissions Officers (AACRAO), *Guidelines for Retention and Disposal of Student Records*, 1998 Update, recommends the minimum retention for transcript requests of one year.

The associate registrar indicated that the campus retains the request data electronically in the Banner database permanently and feels that retention of data in the system exceeds the AACRAO guideline.

Inadequate retention of transcript requests increases the risk of inappropriate and unauthorized acts.

Recommendation 13

We recommend that the campus extend the transcript request retention period to a minimum of one year.

Campus Response

We concur with the recommendation. We have extended our retention of the transcript requests to one year to meet the AACRAO guidelines. Under present circumstances the paper request will be retained but we will move toward imaging the requests and retaining the request electronically with the recently purchased and installed imaging system.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Bob Suzuki	President
Lino Barro	Senior Associate, Institutional Research & Planning
Anne Marie Bird	Associate Dean, Letters Art, & Social Services
Joseph Block	Chair, Liberal Studies
Lucy Breza	Administrative Coordinator, Food, Nutrition & Consumer Science Department
Naomi Caldwell	Payroll Services Manager
Burk Casey	Analyst/Programmer Payroll
Robert Charles	Associate Vice President, Academic Affairs
Yi Cheng	Chair, Electrical & Computer Engineering
Peter Cobo	Information System, University Advancement
Christine Coleman	Information Resources Coordinator, Institutional Research and Planning
Anahid Crecelius	Chair, Food, Nutrition & Consumer Science Department
Alice Cuenco	Manager, Student Accounting and Cashiers
Sue-Ann Davis	Associate Registrar
Yvonne Flores	Clerical Assistant, Public Safety
Tim Fraser	Data Base Administrator
Steven Frieze	Interim director, Institutional Research & Planning
Linda Gaschler	Academic Test Officer, Test Center
Socorro Gomez	Administrative Assistant Advisor, International Business & Marketing
Nancy Hendricks	Lead Records Specialist
Elhami Ibrahim	Associate VP for Academic Programs
Pat Jefferies	Support Desk Specialist, Instructional & Information Technology Division
Jan Jette	Student Record Analyst, College of Engineering
David Johnson	Interim Director of Judicial Affairs
Nancy Kropf	Director of Human Resources
Rose Kukla	Registrar
Dawin Labordo	Executive Director, Finance and Administrative Services
Peggy Madigan	Assistant Coordinator Student Affairs Division
Sue Moore	Electrical & Computer Engineering secretary
Krista Miner	Student Assistant
Carl Rathmann	Interim Dean, College of Engineering
Janet Rice	Help Desk Representative, Computing Resource Center
Lisa Rotunni	Project Associate, Instructional & Information Technology Division
Jane Self	Senior Payroll Coordinator
Marcia Smith	Lead Enrollment Service Representative
Kathy Street	Senior Director Enrollment Services
Gayle Savarese	History Department Secretary
Karin Schott	Enterprise Computing Analyst
Linda Taylor	Administrative Assistant Enrollment Services
Abel Zamora	Analyst Enterprise Computing