

**STUDENT RECORDS & REGISTRATION**

**California Maritime Academy**

**Report Number 99-32**

**February 4, 2000**

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## **ABBREVIATIONS**

AACRAO	American Association of Collegiate Registrars and Admissions Officers
CSU	California State University
EO	Executive Order
ES	Enrollment Services
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
Y2K	Year 2000

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## INTRODUCTION

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### 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 that 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.

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### 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, Executive Order (EO) 382 defines student records 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.

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## 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		
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

The student records and registration function at the Maritime Academy is the responsibility of enrollment services (ES). The ES director reports to the vice president for academic affairs

The automated system for student recordkeeping at the Maritime Academy is an off-the-shelf system called FX Scholar from Champlain software products. This system runs on a Hewlett Packard network server. The campus is in the process of upgrading the student record system to become Y2K compliant.

Registration at the Maritime Academy is manual.

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## OPINION

We visited the campus from September 13 to September 30, 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. Within the centralized student records area, documentation and security controls needed improvement. Additionally,

as described in the report, we have reservations about the practices and procedures in place for grade changes, course withdrawal and grade appeals. There are some limitations as to what can be done with the current automated database as well as features that could be further utilized for enhanced security.

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

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## **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]**

#### **BIENNIAL REVIEWS [6]**

The campus has not been conducting biennial reviews of information management practices concerning student records. Biennial reviews would help assure that information practices concerning student records are appropriate.

### **GRADES [6]**

#### **GRADE CONFIRMATIONS [6]**

There was no confirmation of grades or grade changes. Establishing grade confirmation procedures would help to ensure the accuracy of the student record data system.

#### **GRADE/GRADE CHANGE CONTROLS [7]**

Grade change controls were weakened by the absence of procedures requiring instructor approval. Requiring instructor approval for all grade changes would strengthen grade change controls and provide an additional measure of protection against possible student record inaccuracies.

#### **WITHDRAWAL "W" GRADE DOCUMENTATION [8]**

Controls over course withdrawals were in need of improvement. Establishing course withdrawal policies and procedures consistent with systemwide policy helps to ensure complete documentation of the withdrawal process.

### **GRADE APPEALS [9]**

The campus had not established policies and procedures to address student grade appeals. Establishing student grade appeals policies and procedures would mitigate due process concerns.

### **UNAUTHORIZED GRADING SYMBOL [10]**

The campus was utilizing three unauthorized grading symbols including one to indicate course work transferred from another educational institution, a second for course work validated by special examination, and a third for pass/fail courses. To maintain a common systemwide grading methodology, Chancellor's Office approval of non-standard grading symbols is warranted.

### **DATA CONTROL, SECURITY & INTEGRITY [11]**

#### **TRACKING CONTROLS [10]**

The present automated student record system does not track data input, user, or transaction date. Establishing user-input controls helps to monitor changes to the student record.

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## **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

### **STUDENT RECORD POLICY ADMINISTRATION**

#### **BIENNIAL REVIEWS**

The campus has 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 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 dean of enrollment services indicated that he was not aware of the requirement and that, having been part of the CSU system only three years, he was not aware of all systemwide policies.

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**

The campus will establish a policy to conform with the requirements of Executive Order 382. This policy will be adopted by May 2000. The campus will submit its first biennial report in fall 2001.

### **GRADES**

#### **GRADE CONFIRMATIONS**

There was no confirmation of grades or grade changes. All grades are posted manually.

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

Confirmation of grade postings helps to assure the accuracy of student records and serves as a detective control.

The student records officer stated that she sends out confirmations when requested, but she has never routinely sent out confirmations to all faculty each term.

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

### **Recommendation 2**

We recommend that the campus prepare and distribute grade confirmation reports to instructors each term.

### **Campus Response**

Effective spring semester 2000 the campus will distribute grade reports for the prior semester to each faculty member.

## **GRADE/GRADE CHANGE CONTROLS**

Grade change controls were weakened by the absence of procedures requiring instructor approval.

A review of twenty-five “W” grades issued showed six instances where letter grades were changed to “W” grades without instructor approval.

Executive Order 320 states that, in the absence of compelling reasons such as instructor or clerical error, prejudice or capriciousness, the grade assigned by the instructor or records is to be considered final.

The 1997/99 and 1999/2001 campus catalogs state that grades cannot be changed to “W”.

The student records officer stated that instructors have not been included in the course withdrawals process after census date including instances where letter grades had been issued.

Without instructor approvals, improperly issued grade changes can occur.

### **Recommendation 3**

We recommend that the campus establish procedures to ensure that the course instructors approve all grade changes.

### **Campus Response**

The campus will adopt a procedure that will ensure that the course instructors approve all grade changes. This procedure will be in place for the Spring 2000 semester.

### **WITHDRAWAL "W" GRADE DOCUMENTATION**

Controls over course withdrawals were in need of improvement.

We found that:

- ▶ instructor approvals were not required for course withdrawals after census date;
- ▶ the reasons for course withdrawals after census date were not always documented;
- ▶ campus policy conflicts with system policy on signature requirements for course withdrawals;
- ▶ campus withdrawal policy does not address withdrawals during the last four weeks of instruction; and
- ▶ the campus course schedule for Fall 1999 incorrectly stated that students can withdraw for courses after census date without penalty.

Executive Order 268 states that withdrawals after the census date and prior to the last three weeks of 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 chair 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.

Campus policy 303.7 states that after the first four weeks of instruction, withdrawal from a course is permissible only for serious and compelling reasons and approval to withdraw from a course during this period must be granted by the department chair and the vice president of academic affairs.

Without the instructor's approval, improper course withdrawals can occur. Unless supporting documentation is submitted stating the reason for a withdrawal after census date and the issuance of a "W" grade, the student record is incomplete.

### **Recommendation 4**

We recommend that:

- a. the campus establish procedures to ensure that course withdrawals after census date are approved by the instructor;

- b. course withdrawals after census date are adequately supported and documented;
- c. campus policy 303.7 be rewritten to comply with the course withdrawal approval requirements as stated in Executive Order 268;
- d. the campus withdrawal policy address withdrawals during the final four weeks of classes; and
- e. withdrawal information contained in course schedules be consistent with campus and systemwide policy.

### **Campus Response**

Prior to the start of fall 2000 the campus will develop new, and revise existing, policy to ensure that course withdrawals after census date are adequately supported, documented, and approved by the instructor. Campus policy 303.7 will be rewritten to comply with the course withdrawal approval requirements as stated in Executive Order 268. The policy will indicate that a student who desires to withdraw from a course during the final four weeks of the semester must have a very compelling reason and if approved the student must withdraw from all courses. The campus will review the fall 2000 course schedule to ensure that withdrawal information is consistent with campus and systemwide policy.

### **GRADE APPEALS**

The campus had not established policies and procedures to address student grade appeals.

Executive Order 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 vice president for academic affairs stated that the campus academic senate is in the process of reviewing grade appeals procedures from other CSU campuses. Presently, the campus has an informal grade dispute process that includes initially discussing the grade with the instructor, with a secondary level of discussion with the department chair in which the course is offered, and finally, the student can take a grade dispute to the academic dean.

Without a grade appeals committee, the student grade appeals process may be called into question.

### **Recommendation 5**

We recommend that the campus establish student grade appeals procedures and establish a grade appeals committee to include student representation.

### **Campus Response**

The campus has adopted a grades appeals procedure that conforms with this recommendation.

## **UNAUTHORIZED GRADING SYMBOLS**

The campus was utilizing unauthorized grading symbols to indicate course work transferred from another educational institution, course work validated by special examination and pass/fail courses.

The campus utilizes a “T” grade to denote course work transferred from another educational institution; a “V” to denote course work validated by special examination; and a “P” grade to denote a course taken pass/fail.

Executive Order 268 indicates that the administrative grading symbols of AU, I, RD, SP, W, and U shall be used as circumstances require. It further states that:

No other grading symbols except the traditional A, B, C, D, or F, or the non-traditional A, B, C, CR-NC shall be employed without the express prior approval of the vice chancellor, academic affairs.

The student records officer indicated that the grading symbols and practices were in place prior to the campus becoming part of the CSU, and the use of these symbols and practices have continued.

Not maintaining an effective campus control system for grading symbols may result in inaccuracies in student records and misrepresentation of grading symbols.

### **Recommendation 6**

We recommend that the campus either discontinue use of the “T”, “V”, and “P” grading symbols or obtain Chancellor’s Office approval for the current practice.

### **Campus Response**

The campus will discontinue, after spring 2000, the use of “T”, “V”, and “P” grading symbols.

## **DATA CONTROL, SECURITY & INTEGRITY**

### **TRACKING CONTROLS**

The present automated student record system does not track data input, user, or transaction date.

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

The student records officer stated that there has never been a need for this type of control because it is a stand-alone system and access is limited to herself and one other person excluding IT support staff.

We note that during this review, the dean of enrollment services stated that plans were underway to physically combine the admissions and records offices and provide admissions staff access to the student records database.

Without a user tracking control system in place, unauthorized user changes could go undetected for long periods.

**Recommendation 7**

We recommend that the campus update its student information management system to include user activity tracking controls.

**Campus Response**

In 1997 the campus investigated Quodata, CMDS, Applied Business Technologies, INC, and SCT (Banner) student information management systems. At that time the additional costs ranged between \$150,000 and \$300,000. In addition, staff in the Chancellor's Office requested that the campus wait for the implementation of PeopleSoft. We are continuing to work with our current software vendor, Champlain, to develop the capacity to track user activity. In the interim, the campus will continue to restrict access to the student information management system to the two individuals in the Records Office and the Information Technology staff.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Jerry A. Aspland	President
Nader Bagheri	Chair, Department of Mechanical Engineering
Lee Bateman	Chief Financial Officer
Charlie Bonham	Vice President for Administration and Student Services
Jay Christofferson	Vice President, Academic Affairs
Marjo Crowley	Director, Human Resources
Suzanne Dolan	Director, Student Health Center
Deborah Fischer	Student Records Officer
Cletus Gephart	Chair, Department of Maritime Operations
Steve Kreta	Academic Dean
Robert Lago	Chair, Dept of Naval Science
Aaron Martin	Director of Enrollment Services
Patricia McCarthy	Information Technology Technician
Harriett Millett	Student Conduct Coordinator
Christy Redford	Manager, Accounting
David Sears	Chair, Department of Maritime Management
Earl Summers	Manager, Technical Services
Robert Stewart	Chair, Department of Business Administration
James Wheeler	Chair, Department of General Studies
Robert Wright	Director of Institutional Research