

**STUDENT RECORDS & REGISTRATION**

**CALIFORNIA STATE UNIVERSITY,  
LONG BEACH**

**Report Number 99-34  
March 20, 2000**

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## ABBREVIATIONS

AA	Academic Affairs – a division in the Office of the Chancellor
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
ITS	Information Technology Services
OUA	Office of the University Auditor
PRC	Permanent Record Cards
RD	Report Delayed - an administrative grading symbol authorized by EO 268
SCT	Systems & Computer Technology Corporation
SIMS/R	Student Information Management System/Relational
SIS+	Student Information System Plus
U	Unauthorized Incomplete - an administrative grading symbol authorized by EO 268
VRR	Voice Response Registration
W	Withdrawal – an administrative grading symbol authorized by EO 268

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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 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.

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

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

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

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

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

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## BACKGROUND

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

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

The Banner and Student Information System Plus (SIS+) systems are products of Systems & Computer

Technology (SCT) Corporation. The Student Information Management System/Relational (SIMS/R) database is a CSU developed system in an Oracle client/server environment. The student administration module of PeopleSoft will eventually replace these systems. 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 Long Beach campus is the responsibility of enrollment services, which is supervised by an assistant vice president for enrollment services. The assistant vice president for enrollment services reports through the associate vice president for information management and analysis to the vice president for administration and finance.

The automated system for student recordkeeping at Long Beach is the Student Information System Plus (SIS+) from SCT Corporation that runs on an IBM mainframe computer. Beginning in Fall 1988, student records data was entered in SIS+. Prior to Fall 1988, student records were maintained on permanent record cards.

Registration at the Long Beach campus is predominantly accomplished through a telephone-based system – Voice Response Registration (VRR) or University Automated Service Kiosk (U-ASK). VRR and U-ASK are augmented to the extent necessary through a manual change of program process.

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## OPINION

We visited the campus from November 15, 1999 to December 17, 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, certain systemwide policy compliance requirements had not been met. As described further in the report, there was concern about updating the campus student records policy.

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 were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **STUDENT RECORD POLICY ADMINISTRATION [6]**

#### **POLICY UPDATING [6]**

The campus student records policy was outdated. Maintaining a current student records policy decreases the risk of federal Family Education Rights and Privacy Act (FERPA) interpretations and changes not being implemented.

#### **GRADE APPEALS COMMITTEE [6]**

Student members were not assigned to the grade appeals committee. Student membership provides safeguards to assure due process for both student and instructor.

## **BIENNIAL REVIEWS [7]**

The campus has not been conducting biennial reviews of student records information management practices. Biennial reviews help to ensure the appropriateness of such information practices.

## **GRADES [9]**

### **INCOMPLETE GRADING PROCEDURE [9]**

Incomplete (I) grades were not always counted as a failing grade when assigned work was not completed within the one-year limit. The campus catalog contains a modified version of the required EO 268 statement. Issuing an “F” or “NC” when a student receives an incomplete grade and fails to complete the assigned work reduces inconsistencies use of incomplete grades by instructors.

### **WITHDRAWAL “W” DOCUMENTATION [11]**

Documentation regarding reasons for student withdrawals was inadequate. Proper documentation decreases the risk of incomplete student records.

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## OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

### STUDENT RECORD POLICY ADMINISTRATION

#### POLICY UPDATING

The campus student records policy was outdated.

The campus has not updated its written policy statement outlining procedures to ensure compliance with Executive Order (EO) 382, *Privacy and Personal Information Management, Student Records Administration* as it specifically relates to listing the types of student records maintained, the titles and addresses of the officials responsible for maintaining them, and the location of the access list.

Family Educational Rights and Privacy Act (FERPA) amendments dated 1994, 1995, and 1996 were not noted in the campus Administrative Procedures Manual (77-26), *Family Educational Rights and Privacy Act of 1974, as amended, and Related Student Record Keeping Documents*, dated September 14, 1977 or in the University Administrative Handbook, dated November 1993.

The assistant vice president of enrollment services indicated that while the campus written consolidated policy statement has not been updated, campus practice has remained current in regards to FERPA requirements and all amendments.

The absence of a current student records policy increases the risk of federal FERPA interpretations and changes not being implemented.

#### **Recommendation 1**

We recommend that the campus ensure that the campus student records policy is updated and currently maintained.

#### **Campus Response**

We concur with the recommendation. The Office of Enrollment Services and the Office of Judicial Affairs will jointly conduct a review of our student records practices and issue an updated administrative policy statement in compliance with EO 382. This work will be completed by August 2000, prior to the beginning of the Fall 2000 semester. If prior to that time, it is announced that EO 382 will be updated to reflect current requirements, we will await that update before finalizing our updated policy. The campus will maintain its records policy current as changes occur in the requirements.

## **GRADE APPEALS COMMITTEE**

Student members were not assigned to the grade appeals committee.

Although provision for student membership on the grade appeals committee was noted in the University Policy manual (99-16), members on the committee did not include student representation.

Executive Order (E.O.) 320 Assignment of Grades and Grade Appeals states that the Grade Appeals Committee shall include student membership. E.O. 320 also states that one or more committees for hearing grade appeals shall provide safeguards to assure due process for both student and instructor.

The assistant vice president of enrollment services indicated that the administration had requested appointment of the student representative per established protocol. As of the time of the audit, the Associated Students, Inc. had not filled the available position for this academic year.

The absence of student representation increases the risk that due process for both student and instructor is not followed.

### **Recommendation 2**

We recommend that the campus encourage appropriate student representation on the grade appeals committee.

### **Campus Response**

We concur with the recommendation. The campus policy statement designates the President of the Associated Students, Inc. (ASI) or designee to fill this seat. Every year a letter is sent by the Chair of the Academic Senate to the incoming President of ASI requesting him/her to serve on various committees, including the grade appeals committee, or appoint a designee. Follow-up is done by telephone. A student volunteer has recently been identified to serve as the ASI President's designee on the grade appeals committee. The administration has further committed to reinforce with ASI each year the importance of filling the position prior to the beginning of each academic year. Corrective action on this matter is complete.

## **BIENNIAL REVIEWS**

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

Section D of Executive Order (EO) 382, Privacy and Personal Information Management, Student Records Administration, with an effective date of March 10, 1982, requires each campus to establish

procedures for reviewing the campus information management practices concerning student records. It further states that:

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

The need to forward biennial reviews to the Chancellor's Office was further addressed in the response to the prior systemwide audit of Student Records (90-01). This update was summarized in a coded memorandum from Academic Affairs (AA 91-06) as follows:

In order to meet our commitments to implement the audit recommendations, the Chancellor's Office will cease requesting copies of revised campus student records policies and records of campus biennial reviews. We ask that the campuses continue, however, conducting such reviews as stipulated in EO 382.

The assistant vice president of enrollment services indicated while the campus has not conducted comprehensive biennial reviews, targeted reviews of specific FERPA issues have been conducted such as procedures and controls for the use of mail houses, procedures and controls in implementing a one card, and procedures for releasing of information to honor societies.

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

### **Recommendation 3**

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

### **Campus Response**

We concur with the recommendation. The Office of Enrollment Services and the Office of Judicial Affairs will jointly conduct a review of our student record information practices. This work will be completed by August 2000, prior to the beginning of the Fall 2000 semester. Future biennial reviews will be scheduled for completion in the summer of each even year (i.e. 2002, 2004, 2006, etc.).

## GRADES

### INCOMPLETE GRADING PROCEDURE

Incomplete (I) grades were not always counted as a failing grade when assigned work was not completed within the one-year limit. The campus catalog contains a modified version of the required EO 268 statement.

Of the 20 incomplete grades reviewed, five reverted to a letter grade other than an “F” or “NC.”

Executive Order (EO) 268, Grading Symbols, dated September 1, 1977, states that failure to complete the assigned work will result in an “I” being counted as a failing grade for grade point average and progress point computation. In addition, an “I” must normally be made up within one calendar year immediately following the end of the term during which it was assigned. Failure to complete the assigned work will result in an “I” being counted as a failing grade for grade point average and progress point computation. EO 268 also requires that each campus print a specific statement describing the “I” symbol in the campus catalog.

University Policy (98-07), Grades and Grading Procedures, dated July 15, 1998, states the conditions for removal of the incomplete shall be reduced to writing by the instructor on a “Requirements for Assigning an Incomplete Grade” form. This form shall include a statement of:

- all work completed in the course, the grades assigned for that work, and the percentages of the final grade accounted for by each item;
- the work not completed and the percentage that each uncompleted assignment will count toward the final grade; and
- the final grade the instructor will assign if the course requirements are not completed within one calendar year, or a shorter period as specified on the form, immediately following the term in which the “I” was assigned, without respect to continuous enrollment of the student during the period.

The campus does not print the exact “I” symbol language required by EO 268 in the catalog. They embellish the statement to accommodate the campus interpretation of EO 268 as follows:

I – Incomplete: The symbol “I” indicates that a portion of the required course work (**normally not more than one third**) has not been completed and evaluated in the prescribed time period due to unforeseen, but fully justified, reasons and that, there is still a possibility of earning credit. It is the responsibility of the student to bring pertinent information to the attention of the instructor and to determine from the instructor the remaining course requirements which must be satisfied to remove the Incomplete. A final grade is assigned when the work has been completed and evaluated.

An “I” must normally be made up within one calendar year immediately following the end of the term during which it was assigned, whether or not the student maintains continuous enrollment.

Failure to complete the assigned work will result in an “I” being counted as a failing grade for grade point computation, **except as noted in the third item below.**

An extension of time may be granted for contingencies such as military service or documented, serious health or personal problems.

The conditions for removal of the incomplete will be reduced to writing by the instructor on a “Requirements for Assigning an Incomplete Grade” form. This form will include a statement of:

- all work completed in the course, the grades assigned for that work, and the percentage of the final grade accounted for by each item;
- the work not completed and the percentage that each uncompleted assignment will count toward the final grade; and
- **the final grade the instructor will assign if the course requirements are not completed** within one calendar year, or a shorter period as specified on the form, immediately following the term in which the “I” was assigned, without respect to continuous enrollment of the student during this period.

**(Emphasis added to specifically delineate the differences between the campus policy and the required EO 268 language.)**

The associate vice president of academic affairs indicated that the use of incomplete grades is the prerogative of the faculty. In addition, incomplete grades were initially set up in this manner because many instructors teaching on a temporary basis were not reachable after the student completed the required work.

Failure to revert an incomplete grade to an “F” or “NC” is inconsistent with systemwide, uniform grading practices and defeats the intention of Executive Order 268.

#### **Recommendation 4**

We recommend that the campus print the required EO 268 statement in the catalog and utilize the “I” grade in accordance with Executive Order 268.

#### **Campus Response**

The campus acknowledges that its policies concerning the “I” grading symbol are at variance with the provisions of Executive Order 268. The campus respectfully declines to modify its policies to conform to the provisions of Executive Order 268 and instead recommends to the Board of Trustees that the Office of the Chancellor initiate the appropriate steps to revise the executive order.

The audit report correctly identifies the point at which system policy and campus policy diverge: the Executive Order mandates that when a student does not make up the missing work listed on an

Incomplete contract, the student must receive an “F” in the course, whereas the campus policy allows the instructor of record to specify a letter grade other than “F” when the circumstances warrant. The campus policy has been in effect without any change in language since 1981. Nearly 20 years of experience have led the campus to conclude that its policy is preferable to the one required by the system policy.

First, the Executive Order violates a principle of great importance to the faculty. The campus Policy Statement on Grades and Grading Procedures states, “The faculty member of record in a course section (i.e., the faculty member officially assigned to teach that section) has the exclusive responsibility and authority to assign grades to all students in that section.” [P.S. 99-19, Part III, Paragraph 1] The only exceptions are (1) when a faculty members dies, becomes disabled, separates from the University, or is otherwise prevented from discharging that responsibility, and (2) in the event of a successful grade appeal. By mandating a specific grade when an Incomplete is not made up before the deadline, the Executive Order improperly infringes upon the faculty member's authority to make a decision based solely upon best professional judgment.

Second, and equally important, compliance with the terms of the Executive Order would almost certainly result in some students receiving a grade of "F" when, in fact, they had earned a higher grade. The campus Policy Statement on Grades and Grading Procedures also contains provisions requiring “that final grades shall be based on at least three, and preferably four or more, demonstrations of competence by the student” and stating, “In no case shall the grade on the final examination count for more than one-third of the course grade.” [P.S. 99-19, Part III, Paragraphs 2 and 3] It is quite reasonable to conjecture, therefore, that a student could (1) earn 75 out of a possible 80 points before the final exam, (2) miss the final exam because of illness, (3) decide not to make up the final exam because of the pressures of other work, and (4) quite properly be assigned a grade of “C” by the instructor of record in the event that the final were not taken within one year. If that student were assigned an “F” merely out of respect for an Executive Order in need of reconsideration, it is likely that both the student and the faculty member would be outraged. Under the campus Grade Appeal Policy [P.S. 99-16], the student could file a grade appeal, the instructor could agree not to oppose the appeal, and the grade would wind up being changed to a “C” anyway.

In short, the degree of specificity contained in Executive Order 268 concerning the make-up of Incomplete grades is excessive and inappropriate. In a system as diverse as the CSU, it would be much better to allow the individual campuses to evolve policies better calculated to meet their particular needs. In the case of the Long Beach campus, it is essential to have a policy on the make-up of Incompletes that is compatible with other campus regulations on the administration of final examinations. Executive Order 268 lacks this necessary compatibility.

## **WITHDRAWAL “W” DOCUMENTATION**

Documentation regarding reasons for student withdrawals was inadequate.

Reasons were not documented for withdrawals made during the final three weeks of instruction for eight of 24 student withdrawals reviewed.

Executive Order (E.O.) 268, *Grading Symbols*, dated September 1, 1977, requires a progressively more difficult set of standards for acceptable use of the “W” (Withdrawal) grading symbol based on the timing of the action in relation to completion of the term as follows:

Withdrawals after census date and prior to the last three weeks of instruction are permissible only for serious and compelling reasons. All requests to withdraw under these circumstances and all approvals shall be made in writing on forms prescribed by the campus. The requests and approvals shall state the reasons for the withdrawal. Copies of such approvals shall be kept on file.

The assistant vice president of enrollment services indicated that academic departments maintain supporting documentation for withdrawals made during the final three weeks. Also, the withdrawal form uses abbreviations to indicate the reasons for the withdrawal.

Without appropriate documentation, there is an increased risk that the integrity of the withdrawal grading process will be compromised.

#### **Recommendation 5**

We recommend that the campus strengthen procedures to ensure that reasons for withdrawals are properly documented.

#### **Campus Response**

We concur with the recommendation. The campus has modified the form used to request a withdrawal after the census date. The revised form requires the student to “indicate the ‘serious and compelling’ reason you would like considered in reviewing your withdrawal request.” The revised form is being implemented during the Spring 2000 semester. A copy of the new form has been provided to the auditors. Corrective action on this item is complete.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Robert C. Maxson	President
Susan Abraham	Department Secretary, Mathematics
Susan Alvarez	Evaluation Officer, Enrollment Services
Elizabeth Ambos	Acting Associate Dean, College of Natural Sciences and Mathematics
Debbie Cannon	Department Secretary, Management and Human Resources Management
Steven Katz	Director of Judicial Affairs, Judicial Affairs
Nancy Cohn	Records Manager, Enrollment Services
Betsy Colbert	Administrative Assistant, Judicial Affairs
Carolyn Cook	Records Specialist, Enrollment Services
Frank Costa	Operations Office, College of Natural Science and Mathematics
Debra Covey	Transcript Technician, Enrollment Services
Simeon Crowther	Professor, Economics and Chair, Academic Senate
John Dixon	Associate Director for Administrative and Academic Support, Enrollment Services
Linda Dixon	Office Manager, Mathematics
Tom Enders	Assistant Vice President, Enrollment Services
Gerry Fernandez	Equipment Systems Specialist, Enrollment Services
William Griffith	Vice President for Administration and Finance
Carol Grutzmacher	Coordinator, College of Business Admissions and Advising
Jeff Haas	Analyst/Programmer, Enrollment Services
Kathleen Hext	University Internal Auditor
Marilyn Jensen	Associate Vice President, Academic Affairs
Ellie Johnson	Assistant Coordinator, College of Business Admissions and Advising
Sharon King	Administrative Assistant, Enrollment Services
Laura Kingsford	Department Chair, Biological Sciences
Lena Large	Hard Copy Records Manager, Enrollment Services
Ron Lee	Associate Vice President, Information Management and Analysis
Shirley Looney	Records Clerk, Transcripts
Michael Markoski	Director, Information Technology Services
Marjorie Mashburn	Cashier Supervisor, Cashiering
Vicki McAlister	Security Administrator, Information Technology Services
Connie McCarroll	Coordinator, College of Business Administration
Jonathan Monat	Department Chair, Management and Human Resources Management
Leah Nieto	Analyst/Programmer, Enrollment Services
Wayne Phillips	Analyst/Programmer, Enrollment Services
Keith Polakoff	Associate Vice President, Instructional Programs
Kathy Smalley	Administrative Assistant, Academic Affairs
Arthur Wayman	Department Chair, Mathematics
Leslie Wolbers	Student Accounts Service Manager, Accounts Receivable
Corrie Zinn	Department Secretary, Mathematics