STUDENT RECORDS AND REGISTRATION

SYSTEMWIDE

Audit Report 08-35
July 9, 2009

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ABBREVIATIONS

CFR       Code of Federal Regulations
CMS       Common Management Systems
CSU       California State University
EO        Executive Order
ES        Enrollment Services
FERPA     Family Educational Rights and Privacy Act of 1974 (As Amended)
GC        Government Code
I Grade    Incompletes
ITS       Information Technology Services
PRA       California Public Records Act
RD Grade   Report Delayed
RRE       Registration and Evaluation
SAM       State Administrative Manual
SIMS/R    Student Information Management System/Relational
SRR       Student Records and Registration
W Grade    Withdrawals
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2005, the Board of Trustees, at its January 2008 meeting, directed that Student Records and Registration (SRR) be reviewed. SRR was last audited in 1999.

We visited eight campuses (Fresno, Long Beach, Los Angeles, Monterey Bay, San Bernardino, San Diego, San Marcos, and Sonoma) from February 25, 2008, through December 17, 2008, and audited the procedures in effect at that time. Campus specific findings and recommendations have been discussed and reported individually.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant risk exposures if not corrected. Specifically, there was inadequate and inconsistent controls to ensure campus compliance with prevailing systemwide policies and procedures in the student records and registration area; limited guidance in various areas such as registration holds/priorities and releasing student grade distribution records; and a lack of standardized technology and negotiated procurement/maintenance arrangements for document imaging systems used systemwide. We also noted that five of the eleven findings were repeats from the prior SRR audit, and one of the five findings was a repeat from two prior SRR audits and the 2004 Admissions audit. The need for fully developed business continuity plans in all campus areas, including SRR, was also included in two prior systemwide audits of this subject. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls of student records and registration in effect as of December 17, 2008, taken as a whole, were sufficient to meet the objectives stated below.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

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

GENERAL ENVIRONMENT [7]

The chancellor’s office had not issued systemwide policies on the extent of information the campuses should release in response to recent public records act requests for student grade distribution.

REGISTRATION [9]

Most campuses were not aggressively monitoring changes in registration priorities and use of registration holds.
EXECUTIVE SUMMARY

GRADING/RECORD ACCURACY AND INTEGRITY [10]

Campuses utilized unauthorized grading symbols not identified in systemwide policy. Grade change systems among the campuses needed improvement with regard to the number of users who can change grades, generation of grade change audit reports, and turnaround documents to notify instructors of grade changes. Documentation on incomplete grading symbols varied at the campuses visited, campuses were not adequately justifying withdrawals after census date nor capturing dates of last attendance on unauthorized withdrawals, and campuses did not replace the administrative grading symbol RD (Report Delayed) with a substantive grade on a timely basis. At four campuses, grade appeal cases were not consistently reported on an annual basis to the campus faculty senates and presidents, and two campuses had vacancies for required student membership on grade appeal committees. All areas addressed in this summary except RD grading were repeats from the prior SRR audit.

SECURITY OF STUDENT RECORDS [22]

Only two of eight campuses visited had biennially reviewed student information management practices and forwarded the results to the chancellor. Only one of eight campuses visited had prepared a reasonable business continuity plan for student record and registration. Both issues were repeat findings from prior systemwide audits. In addition, the California State University had neither standardized document imaging systems in student records nor negotiated favorable procurement/maintenance arrangements systemwide.
INTRODUCTION

BACKGROUND

In recent years, the systems used for student records and registration in the California State University (CSU) have changed to accommodate implementation of Common Management Systems (CMS) and the suite of software from Oracle/PeopleSoft. One of three CMS applications is Student Administration/Campus Solutions. The CSU implementation of Campus Solutions includes the following modules: Academic Advisement, Admissions, Campus Community, Financial Aid, Student Financials, and Student Records.

At the time of the audit, two CSU campuses (San Diego and San Francisco) were using a non-CMS legacy system for student records. This system is Student Information Management System/Relational (SIMS/R).

The Family Educational Rights and Privacy Act (FERPA) of 1974, which, as amended, governs the confidentiality and privacy of student educational records. FERPA covers all institutions that receive funding of any kind administered by the U.S. Department of Education including, for example, federal student financial aid programs. Educational records are those records that are directly related to a student. Per 34 CFR 99.3 (Code of Federal Regulations), records are directly related if they are either personally identifiable or easily traceable to the student. FERPA divides student records into two distinct categories: directory information and non-directory or confidential information. Directory information is information contained in the educational records of a student that would not generally be considered harmful or an invasion of privacy if disclosed. FERPA covers records generated and held by many different campus offices including official academic records held by campus registrars. Generally, school officials with a legitimate educational interest can access student educational records; otherwise, disclosure or release of information is protected and institutions which do not comply with FERPA can have federal funding withheld.

The Office of the University Auditor last reviewed Student Records and Registration (SRR) in 1999 and found that systemwide policies pertaining to incomplete grading, the withdrawal process, the approval of grading symbols, and other applicable areas were outdated and needed updating to provide clear guidance and direction to the campuses. In November 2001, the chancellor’s office published Executive Order (EO) 792, Grading Symbols, Assignment of Grades, and Grade Appeals that established administrative grading symbols, minimum standards governing the assignment of grades, and provisions for appeal to ensure that the rights and responsibilities of faculty and students were properly recognized and protected. Most recently, EO 792 has been superseded by EO 1037, Grading Symbols, Minimum Standards Governing the Assignment of Grades, Policies on the Repetition of Courses, Policies on Academic Renewal, and Grade Appeals, that was signed and transmitted to the campuses on September 8, 2008, with an effective date for implementation of August 1, 2009.

At the campuses, the registrar is typically the office/position responsible for SRR. The registrar function is typically part of enrollment management/services. Six of the eight campuses visited had enrollment management/services reporting to the vice president for student affairs. The two exceptions were San Diego that reported to the provost/vice president for academic affairs and Long Beach that reported to the vice president for administration and finance.
At the chancellor’s office, SRR is primarily the responsibility of enrollment management services that reports through the assistant vice chancellor, student academic support to the executive vice chancellor and chief academic officer. An affinity group of campus deans, directors, and officers in SRR functions (DAR/DOR – Deans/Directors of Admissions and Records and Deans/Directors of Outreach and Recruitment) provides active support in systemwide administration.

On a systemwide basis, information technology services (ITS) in the chancellor’s office also supports SRR through development, maintenance, operational troubleshooting, and upgrades on CMS. The ITS functions involved with CMS are collectively known as CMS Central. The standard CMS software delivered to the campuses by CMS Central is the CMS baseline. Campuses need CMS Central permission to modify the CMS baseline, and once they implement a local “mod,” maintenance and support becomes the responsibility of the campus. Baseline mod alternatives for additional CMS functionality include use of database triggers or bolt-on applications.

Systemwide CMS user groups are charged with providing campus-based knowledge, guidance, practices, and recommendations to determine effective business solutions and to assist with CMS strategic planning. One such user group for SRR is the Campus Solutions User Group (formerly the Student Administration User Group).
INTRODUCTION

PURPOSE

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to SRR administration.

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

- Accountability for the registration and student records functions has been clearly defined and documented including delineation of roles and responsibilities, provisions for formulation of goals/objectives, and measurement of outcomes.

- Registration/student records’ calendars, policies and procedures, and standard forms are current and comprehensive; and aligned with relevant federal and state laws/regulations and CSU directives.

- The registration process/system is equitable with advance registration priorities consistent with campus needs and minimization of opportunities for favoritism.

- The risks of registering ineligible students or students who later result in excessive disenrollments are reasonably mitigated in the registration process/system.

- Instructors of record are integrally involved in assigning grades and processing grade changes.

- Students have a reasonable opportunity to appeal arbitrary and capricious grades.

- Grades are changed only in accordance with campus authorizations.

- Excessive use of Report Delayed (RD) grades or RD grades not replaced as soon as possible adversely affects the accuracy of student records.

- Inadequately documented Incomplete (I) grades or I grades not converted within established time limits adversely affects the accuracy and integrity of student records.

- Withdrawals (W) grades after census date or in the last 20 percent of instruction without adequate justification adversely affect the accuracy and integrity of student records.

- The campus has adopted written FERPA policies and biennially reviews information management practices for student records.

- Access to automated systems is controlled and limited to authorized users; data backup procedures are in place; and physical security over system hardware is adequate.

- Dissemination of protected information from student records is adequately controlled.

- The campus has adequate measures to protect student records from destruction/loss and control the shredding of confidential source documents.
The proposed scope of audit, as presented in Attachment B, Agenda Item 2 of the January 22-23, 2008, meeting of the Committee on Audit, stated that SRR includes review of database recordkeeping and registration systems, procedures for creating and changing records, and security measures protecting against unauthorized or inadvertent modification, removal, or destruction of records.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect for fiscal year 2007/08.

Specifically, we reviewed and tested:

- Application of registration priorities.
- Use of registration holds.
- Assignment of grades including various grading symbols such as RD and I grades.
- Disenrollments and extent of student withdrawals.
- Grade change authorizations.
- Grade appeal processes.
- FERPA policies and procedures.
- Limitations on access to student records.
-Disclosure of student records.
- Issuance of transcripts.
- Business continuity planning for student records.
OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

GENERAL ENVIRONMENT

The chancellor’s office had not issued systemwide policies on the extent of information the campuses should release in response to recent Public Records Act (PRA) requests for student grade distributions.

Since approximately 2001, campuses received and responded to ongoing PRA requests for grade distribution data from web-based services such as Pick-a-Prof and Campus Buddy. A typical disclosure involved a presentation of grades for all classes by a particular term with detail such as:

<table>
<thead>
<tr>
<th>Department/ Course #</th>
<th>TVF 303B</th>
<th>AL 101</th>
<th>ENGL 499</th>
<th>EDAD 581</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section #</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Instructor</td>
<td>Marcus Williams</td>
<td>Liudmila Flores</td>
<td>Hema Chari</td>
<td>Lewis Taylor</td>
</tr>
<tr>
<td>A</td>
<td>9</td>
<td></td>
<td>18</td>
<td></td>
</tr>
<tr>
<td>A-</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B-</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B+</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C-</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C+</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CR</td>
<td>11</td>
<td>10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D-</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>D+</td>
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<td></td>
</tr>
<tr>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NC</td>
<td></td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RD</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>W</td>
<td></td>
<td></td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>WU</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>11</td>
<td>23</td>
<td>10</td>
<td>18</td>
</tr>
</tbody>
</table>

TVF = Television, Film and Media Studies, AL = Arts and Letters, ENGL = English, EDAD = Educational Administration
Information would be displayed in terms of the actual number of enrolled students or converted to the percentages of enrolled students receiving each grade. Campuses released the data electronically as an Adobe Acrobat document or a Microsoft Excel spreadsheet.

Student privacy considerations should dictate limiting the disclosure to classes greater than a certain size, classes where substantially all students did not receive the same grade, or any other classes where it would not be possible to reasonably deduce what grade a specific student received.

The Office of General Counsel’s Records Access Manual provides an overview of the three most significant statutes governing access to records in the possession of the California State University – (1) the California Public Records Act; (2) the Information Practices Act; and (3) the Family Educational Rights and Privacy Act (commonly known as FERPA or the Buckley Amendment).

Campuses typically had different offices involved in preparing and releasing responses to PRA requests and many of the registrars were unaware of what had been released.

Disclosure of excessive information jeopardizes student privacy and increases the risk of non-compliance with FERPA that could result in withdrawal of federal funding.

**Recommendation 1**

We recommend that the chancellor’s office issue systemwide policies on the extent of information the campuses should release in response to recent PRA requests for grade distribution. Consideration should be given to including these policies in existing documents such as Executive Order (EO) 796 that currently addresses privacy and personal information management for student records administration.

**Management Response**

After consultation with the California State University (CSU) Office of the General Counsel (OGC), we believe that the matter of PRA requests has already been addressed.

a. In its Records Access Manual, the CSU OGC has provided guidance and procedures for use by campuses in the event of PRA requests. That information is found on page 6 of that document:

"Each campus should have a central contact point for coordination of Public Records Act requests. The CSU General Counsel should be notified of all incoming requests, so they can be coordinated throughout the system. Each campus should respond to requests for records maintained at that campus. University Counsel is available to respond to questions and provide advice."

b. In short, the CSU OGC has already provided both policy and guidance regarding PRA requests. Presidents and registrars will be reminded by memorandum of the availability of the CSU OGC’s Records Access Manual no later than January 1, 2010.
REGISTRATION

Most campuses were not aggressively monitoring changes in registration priorities and use of registration holds.

Registration Priorities

Registration priorities are valuable commodities that assure individual students can get classes at the most desirable days/times and/or popular professors. Every campus visited typically based registration priorities on campus policy that assigned students to a particular registration cohort. The student’s cohort defined the order of when they could register. Registration cohorts included such groups as student-athletes, presidential scholars, disabled students, and veterans or class level (seniors, freshman, etc.). Blocked registration dates and times were driven by the capacity of the system. For example, day one of registration might start at 7 a.m. with half-hour intervals throughout the day in which 500 students could register in each 30-minute increment. Mechanically, students were assigned a specific date and time for registration through a computer program in the Common Management Systems (CMS) baseline for appointments.

Every campus indicated that they discouraged and limited changes in registration priorities and that the number of staff who could change a registration priority in the system was defined by security access privileges. However, we noted that none of the campuses monitored these changes.

Registration Holds

Registration holds are created for a variety of reasons, and a frequent registration hold is a cashiering hold for students who have not fulfilled some financial obligation. Because of the many different types of holds, a large number of users typically could establish or release holds. At larger campuses, this frequently involved over 150 staff. We noted that none of the campuses visited monitored changes in registration holds; and similar to registration priorities, campuses chose to trust that staff would exercise authority responsibly.

State Administrative Manual (SAM) §5300.3 requires state agencies to provide for the proper use and protection of its information assets. SAM §5305.1 further stipulates responsibility for each agency to define a cost-effective approach to managing risks associated with its information assets.

Campuses frequently stated that CMS Central should build monitoring capabilities for registration holds/priorities into the CMS baseline system. CMS Central generally took the position that they can do whatever is requested by users, but monitoring of changes in registration holds/priorities has not made the list of CMS baseline enhancements. In addition, there were unresolved differences of opinion regarding what CMS Central needed to program into the CMS baseline versus what the campuses could independently accomplish through other options.

Not reviewing changes in registration holds and priorities creates opportunities for staff to make unauthorized changes and unnecessarily exposes the campus to reputational risks when budget
cutbacks in class section capacity and other factors make it increasingly more difficult for students with low registration priorities to get their required classes.

**Recommendation 2**

We recommend that the chancellor’s office:

a. Establish a policy requiring campuses to monitor changes in registration holds/priorities.

b. Consider identifying a working group of campus personnel and CMS Central to review the feasibility and cost-effectiveness of building monitoring capabilities for registration holds/priorities into the CMS baseline system or formally adopting a better method.

**Management Response**

We concur.

a. A policy requiring campuses to monitor changes in registration priority will be established and communicated by January 2010.

b. Academic Affairs staff and campus representatives will work with CMS Central to review the feasibility and cost-effectiveness of providing “baseline” capability for the monitoring of changes in registration priority. In the meantime, CMS campuses have already provided CMS Central methods for assigning registration priority as well as the local capability to generate reports, which may be used to monitor registration priorities. Work on this project will be completed by February 1, 2010.

**GRADING/RECORD ACCURACY AND INTEGRITY**

**UNAUTHORIZED GRADING SYMBOLS**

Campuses utilized unauthorized grading symbols not identified in systemwide policy. This is a repeat finding from the prior Student Records and Registration (SRR) audit.

Two of the campuses visited had unauthorized grading symbols defined and published in catalog explanations of academic regulations as follows:

<table>
<thead>
<tr>
<th>Campus</th>
<th>Symbol</th>
<th>Symbol Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Bernardino</td>
<td>U</td>
<td>Unauthorized Incomplete</td>
</tr>
<tr>
<td></td>
<td>CBE</td>
<td>Credit by Exam</td>
</tr>
<tr>
<td></td>
<td>WF</td>
<td>Withdrawn Failing</td>
</tr>
<tr>
<td></td>
<td>FW</td>
<td>Failed, Withdrew</td>
</tr>
<tr>
<td></td>
<td>UW</td>
<td>Unofficial Withdrawal</td>
</tr>
<tr>
<td>Sonoma</td>
<td>PRV</td>
<td>Provisional Graduate Credit</td>
</tr>
</tbody>
</table>
The Sonoma campus also used an asterisk with approved grading symbols such as “*A” or “*B” – the addition of the asterisk changed what would otherwise be acceptable to multiple unauthorized grading symbols. The asterisk meant that the student had taken the class once already for credit and was not entitled to have the units counted towards graduation but the grade did calculate in the student’s grade-point average. The terminology used by the campus to describe the asterisk is “excess units.”

In contrast to systemwide policy limitations on grading symbols, the CMS baseline delivered to the campuses expressly allowed campuses to create whatever grading symbols they choose through the Grading Scheme Table, which is defined as “Campus (REQ)” under the following schema methodology:

<table>
<thead>
<tr>
<th>Owner and Type</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CMS (REQ)</td>
<td>A required field, owned by CMS</td>
</tr>
<tr>
<td>Campus (REQ)</td>
<td>A required field, owned by the campus</td>
</tr>
<tr>
<td>Campus (OPT)</td>
<td>An optional field, owned by the campus</td>
</tr>
<tr>
<td>Not Used</td>
<td>Fields that should not be used by CMS</td>
</tr>
</tbody>
</table>

The description of Grade Change Table in CMS baseline documentation states that:

- Campuses should use the Grading Scheme Table page to define all valid grading schemes. Enter each grading scheme and the associated grading bases and grades on this page.

- These values must be set up to support the set of grading bases and grades active at a point in time during your institution’s history. For conversion purposes, you may wish to establish a historical “collection” of all grading bases and grades ever used, and then, if there are some grades that are no longer used, establish another effective-dated Grade Scheme going forward containing only the current active grading bases and grades.

EO 792, Grading Symbols, Assignment of Grades, and Grade Appeals, dated September 1, 2002, and its successor EO 1037, Grading Symbols, Minimum Standards Governing the Assignment of Grades, Policies on the Repetition of Courses, Policies on Academic Renewal, and Grade Appeals, dated September 8, 2008, with an effective date of August 1, 2009, both limit the use of grading symbols with the following explicit language (emphasis added):

The administrative grading symbols AU, I, IC, RD, RP, W, and WU along with the definitions, rules, and procedures governing their application shall be utilized as circumstances require on all California State University campuses. Use of the symbols AU and RD are optional with each campus, except that where utilized, the definition and circumstances of application shall be as provided herein. **No other grading symbols except the traditional grades of A, B, C, D, or F; or the non-traditional grades of A, B, C, NC; or CR-NC (where specifically authorized) shall be employed without the express prior approval of the executive vice chancellor and chief academic officer.** To the extent permitted by Section 40104.1 of Title 5 of the California
Code of Regulations, each campus may use plus and minus designations in combination with traditional letter grades of A, B, C, and D.

This EO language contains explicit business rules on grading symbol authorizations. The executive vice chancellor and chief academic officer has not approved any exceptions.

SAM §5300.3 requires state agencies to provide for the proper use and protection of its information assets. SAM §5305.1 further stipulates responsibility for each agency to define a cost-effective approach to managing risks associated with its information assets.

Campuses asserted that the chancellor’s office delivered the CMS baseline with flexible coding options available for them to enter whatever grade symbol variables desired in the Grading Scheme Table.

Not adhering to systemwide standards compromises the uniformity of grading methodology.

**Recommendation 3**

We recommend that the chancellor’s office consider utilizing the CMS baseline system to enforce current business rules limiting the campuses to authorized grading symbols.

**Management Response**

We concur with the following caveats:

a. It is probably neither wise nor practical to “revise history” by removing or making substitutions for the unauthorized grades, which are already parts of individual student records.

b. CMS modifications needed to “enforce current business rules…” would involve costs for which current funding may not be available. Student Academic Support staff will consult with CMS baseline staff to determine if any cost-effective options may be available for the use of CMS baseline to control the use of unauthorized grading symbols.

c. Academic Affairs will bring CMS as well as chancellor’s office and representative campus staff together no later than January 2010, and an analysis of the efficacy and cost of the indicated modification will be provided by March 1, 2010.

**GRADE CHANGES**

Grade change systems among the campuses needed improvement.

The chancellor’s office had not systematically evaluated the number of users on each campus who have the capability to change grades nor established a policy requirement for campuses to review related audit reports and document the results of the review. In addition, some campuses had not
implemented effective systems to notify instructors of record when a grade that they had assigned had been changed.

**Extent of Authorizations**

CMS security governs who can change grades in the system, and the individual campuses independently control configuration of security arrangements.

Decentralized implementation of security resulted in widely divergent practices among the campuses in the number of staff who had authorization in CMS to change grades. In relation to the number of enrolled students, we found a range at the campuses visited as follows:

<table>
<thead>
<tr>
<th>Campus</th>
<th>Fall 2007 Student Enrollment</th>
<th>No. of Staff Who Can Change Grades</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresno</td>
<td>22,383</td>
<td>40</td>
</tr>
<tr>
<td>Long Beach</td>
<td>36,868</td>
<td>15</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>21,051</td>
<td>12</td>
</tr>
<tr>
<td>Monterey Bay</td>
<td>4,080</td>
<td>5</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>17,066</td>
<td>15</td>
</tr>
<tr>
<td>San Diego</td>
<td>36,559</td>
<td>16</td>
</tr>
<tr>
<td>San Marcos</td>
<td>9,159</td>
<td>12</td>
</tr>
<tr>
<td>Sonoma</td>
<td>8,770</td>
<td>53</td>
</tr>
</tbody>
</table>

Reducing the number of users who can change grades in CMS in proportion to some reasonable measurement, such as the number of students, would limit the risk exposure of unauthorized grade changes.

**Audit Reports**

Campuses can generate grade change audit reports though the CMS baseline with any frequency desired – on demand through queries or screen access or at pre-determined intervals through programming routines. Results can be output in a variety of ways to designated recipients. However, there is no systemwide policy on the minimum frequency for these reports, designation of positions that should have the responsibility to review the reports, nor standards on documenting the results of the reviews.

**Turnaround Documents**

The CSU implemented the CMS baseline without system-generated notices to instructors of record on grade changes.

The alternative to standard system-generated notices has been a patchwork of different campus arrangements. One system used multipart grade change request forms completed by the instructor of
record, approved as specified in local campus policy, and forwarded to the registrar’s office. Once
the grade change was made in CMS, the registrar’s office retained the original copy of the request
and routed one of the additional copies back to the originating academic department/instructor.
Other campuses incorporated some type of email notification, but none of the campuses utilized the
automated messaging capabilities in CMS for system-generated notifications.

During the course of the audit, we also requested that the chancellor’s office conduct an informal
systemwide survey of grade change processes. Results indicated that some campuses do not use
instructor notifications as follows:

<table>
<thead>
<tr>
<th>Campus</th>
<th>Notify Instructor</th>
<th>Process in Place / Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bakersfield</td>
<td></td>
<td>No response received.</td>
</tr>
<tr>
<td>Channel Islands</td>
<td>By Email</td>
<td>Channel Islands has not developed an automated notification process, although we do notify both instructors and students by email when a grade change has been processed.</td>
</tr>
<tr>
<td>Chico</td>
<td>Paper Copy</td>
<td>Campus sends a paper copy of the grade change form back to the instructor to ensure they are aware of the change.</td>
</tr>
<tr>
<td>Dominguez Hills</td>
<td></td>
<td>No response received.</td>
</tr>
<tr>
<td>East Bay</td>
<td>No</td>
<td>East Bay does not currently use the functionality in CMS 8.9, nor do we notify instructors currently when grade changes are made.</td>
</tr>
<tr>
<td>Fresno</td>
<td>By Email</td>
<td>A custom job sends a confirmation email to the instructor of record (department chair in the absence of the instructor) when a grade change is posted to a student's record. The process runs every weekend for the grade changes that were made during the week.</td>
</tr>
<tr>
<td>Fullerton</td>
<td>No</td>
<td>Campus does not notify instructors when a grade change is made.</td>
</tr>
<tr>
<td>Humboldt</td>
<td></td>
<td>No response received.</td>
</tr>
<tr>
<td>Long Beach</td>
<td>Paper Copy to Dept</td>
<td>Our official Change of Grade forms are three-part NCR forms. After grade changes are received (hand-carried to enrollment services by authorized departmental staff/faculty), reviewed, and processed, staff indicate on the form that the change has been made. The copies are then distributed as follows: • Original copy is retained in enrollment services. • One copy is mailed to the student, notifying him or her that the change has been made, • One copy is returned to the department as confirmation that the change has been made.</td>
</tr>
<tr>
<td>Campus</td>
<td>Notify Instructor</td>
<td>Process in Place / Response</td>
</tr>
<tr>
<td>-------------</td>
<td>-------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>Paper Copy to Dept</td>
<td>Campus currently notifies instructors when grade changes are completed by returning the second part of a two-part Change of Grade form that is originally submitted to begin the process.</td>
</tr>
<tr>
<td>Maritime</td>
<td>By Email</td>
<td>After a student’s grade is changed by my office, the student is emailed that they can go online to view their new grade, and the instructor is copied on the email.</td>
</tr>
<tr>
<td>Monterey Bay</td>
<td>No</td>
<td>No notification.</td>
</tr>
<tr>
<td>Northridge</td>
<td>Indirectly Thru Dept Report</td>
<td>Grade changes are reported to the colleges and their departments. Departments contact the faculty members who submitted the grades for verification; faculty signatures and dates are required on the forms, which are expected to be retained in the department offices for at least five years.</td>
</tr>
<tr>
<td>Pomona</td>
<td>By Email</td>
<td>Pomona does not use the &quot;automatic notification of grade change to faculty.&quot; We have an email template that records specialists fill out and send to the instructor of record after each grade change has been posted. The email asks instructors who may have questions regarding a specific grade change to call the lead records specialist in the registrar's office. Additionally, instructors are able to view their grade rosters online, real-time.</td>
</tr>
<tr>
<td>Sacramento</td>
<td>Paper Copy</td>
<td>When the grade change has been processed, the campus sends a copy of the processed document back to the department chair.</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>Paper Copy</td>
<td>Campus currently sends a copy of the posted grade changes to the department/faculty.</td>
</tr>
<tr>
<td>San Diego</td>
<td>No</td>
<td>Grade request form is scanned and discarded.</td>
</tr>
<tr>
<td>San Francisco</td>
<td>Email / web application reports in process - Process will be implemented FALL 2008</td>
<td>Campus is finalizing an application for faculty to input their grade changes on the web - this application includes email notification/confirmation to faculty and students when a grade has been posted on a student's record. The application will also automatically calculate the academic status of a student and update their probation status if the grade change affects the GPA. In addition, we are creating web reports for faculty, chairs, and deans for them to view all their grade changes. They will have a dashboard to select: by date, by student, by class, or by department and/or college.</td>
</tr>
<tr>
<td>San José</td>
<td>No</td>
<td>Campus does not notify instructors when grade changes are made. Campus stated they are &quot;...looking at workflow to provide the capability to change grades electronically and provide notification to faculty.&quot;</td>
</tr>
</tbody>
</table>
Government Code (GC) §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

SAM §5300.3 requires state agencies to provide for the proper use and protection of its information assets. SAM §5305.1 further stipulates responsibility for each agency to define a cost-effective approach to managing risks associated with its information assets.

Many campuses had deferred improvements in grade change controls during the implementation of the CMS student records module.

Not maintaining an effective overall campus control system for grade changes results in unacceptable risk exposures and potential inaccuracies in student records.

**Recommendation 4**

We recommend that the chancellor’s office:

a. Establish systemwide policies and procedures for grade changes that include, but are not limited to, a standard of comparison for the maximum number of users on each campus that need the capability to change grades; systematic review, approval, and documentation of grade change audit reports; and the use of effective turnaround documents to notify instructors of grade changes.

b. Consider utilizing the CMS baseline to produce system-generated notices to instructors of record on grade changes.
Management Response

We concur and note the following:

a. Prior to February 2010, systemwide policy regarding the maximum number of users with “grade change” capability, systemwide review of grade change documentation, and the inclusion of effective notice to instructors in the event of grade changes will be drafted. After appropriate consultation with campus representatives, such a policy will be finalized and distributed prior to June 2010.

b. Consideration will be given to the use of CMS baseline to produce automatically generated notification of grade changes. (The cost of a systemwide procedure is likely to be moderate, but CMS leadership perceives the feasibility of a systemwide solution may be low.)

c. Computerized local solutions may also not be cost-effective in the current fiscal environment.

d. Prior to January 1, 2010, Academic Affairs will convene internal and chancellor’s office CMS staff to analyze the potential for using CMS to notify instructors of grade changes. A report of the feasibility and estimated cost of such functionality will be provided by Student Academic Support and CMS Central no later than April 1, 2010.

INCOMPLETES

Documentation on incomplete grading symbols varied at the campuses visited. This is a repeat finding from the prior SRR audit.

We noted that four of the eight campuses visited were not documenting conditions for removal of incomplete grades and two of these four campuses were not converting incompletes to failing grades on a timely basis.

Of the eight campuses, only one (Long Beach) had designated a single official rather than multiple officials with the responsibility to receive incomplete documentation. At this campus, the designee was also in a position outside of academic departments/offices. By doing so, this campus enabled a central repository and clearing process to check for necessary documents that included specific deadlines by which instructors had to submit missing documentation. At other campuses, instructors were supposed to prepare the incomplete agreement and file it with their academic department or with the academic department of the student’s major. The multiplicity of academic departments involved creates the potential for inconsistencies in document preparation and enforcement of deadlines.

EO 792, Grading Symbols, Assignment of Grades, and Grade Appeals, dated September 1, 2002, and its successor EO 1037, Grading Symbols, Minimum Standards Governing the Assignment of Grades, Policies on the Repetition of Courses, Policies on Academic Renewal, and Grade Appeals, dated September 8, 2008, with an effective date of August 1, 2009, both state that:
The conditions for removal of the incomplete shall be reduced to writing by the instructor and given to the student with a copy placed on file with the appropriate campus officer until the incomplete is removed or the time limit for removal has passed.

An incomplete shall be converted to the appropriate grade or symbol within one year following the end of the term during which it was assigned; however, an extension of the one-year time limit may be granted by petition for contingencies such as intervening military service and serious health or personal problems.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

Some campuses stated that the self-service grading features of the CMS baseline system no longer provided them the opportunity to review incomplete agreements, because when faculty enter and approve incomplete grades online, they bypassed past reviews of grade rosters by department offices. Current CMS baseline processes whereby a central campus official (usually the registrar) accepts grades for posting directly from faculty excluded department chairs that have typically been delegated as the official responsible for receiving and retaining incomplete contracts. Although EO 792 (and the successor EO 1037) requires certain documentation as a condition of assigning incomplete grades, there is no programming included in the CMS baseline system to encourage adherence to the requirements.

Existence of incompletes without adequate documentation and an effective process for assuring compliance with systemwide requirements exposes the California State University (CSU) to inconsistencies in grading among the campuses and to misunderstandings on the validity of the grading process.

**Recommendation 5**

We recommend that the chancellor’s office consider utilizing the CMS baseline system to facilitate completion of incomplete agreements.

**Management Response**

We concur. The upcoming release of modifications to CMS baseline (October 2009) will include capability to implement this recommendation. Academic Affairs staff will meet with CMS Central staff in January 2010 to assess the progress towards campuses “being able to facilitate the completion of incomplete agreements.”
WITHDRAWALS

Campuses were not adequately justifying withdrawals after census date nor capturing dates of last attendance on unauthorized withdrawals. This is a repeat finding from the prior SRR audit.

The following campuses were inadequately documenting the justification for withdrawals:

<table>
<thead>
<tr>
<th>Campus</th>
<th>Serious and Compelling Reason</th>
<th>Approval in Last 20% of Instruction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresno</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Long Beach</td>
<td>√</td>
<td>√</td>
</tr>
<tr>
<td>Los Angeles</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monterey Bay</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>San Bernardino</td>
<td></td>
<td></td>
</tr>
<tr>
<td>San Diego</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>San Marcos</td>
<td>√</td>
<td>√</td>
</tr>
<tr>
<td>Sonoma</td>
<td>√</td>
<td></td>
</tr>
</tbody>
</table>

Additionally, there was no manual or automated process for capturing the date of last attendance for unauthorized withdrawals.


- Withdrawals after the census date and prior to the last 20 percent of instruction may be assigned 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 and/or dean as described by campus policy.

- Withdrawals shall not be permitted during the final 20 percent of instruction except in cases such as accident or serious illness, where the cause of withdrawal is due to circumstances clearly beyond the student’s control and the assignment of an incomplete is not practical. Permission to withdraw under these circumstances shall be granted only with the approval of the instructor and the department chair and/or dean as described by campus policy and must also be approved by the academic administrator appointed by the president.

- The unauthorized withdrawal symbol shall be used where a student, who is enrolled on the census date, does not officially withdraw from a course but fails to complete it. For unauthorized withdrawals, the instructor shall report the last known date of attendance.
Campuses often neglected to explicitly delegate responsibility for approval of withdrawals in the last 20 percent of instruction due to the existence of other documents such as position descriptions. A serious and compelling reason was subject to wide interpretation and the extent of documentation varied accordingly. The CMS baseline system did not include the capability to capture the dates of last attendance when the instructor utilized the unauthorized incomplete symbol through self-service grading.

Failure to ensure that withdrawals are in compliance with stated policies and are properly approved increases the risk that the accuracy and integrity of student records is negatively affected. Not recording the last known date of attendance for unauthorized withdrawals could have financial aid implications.

**Recommendation 6**

We recommend that the chancellor’s office:

a. Remind the campuses to comply with withdrawal provisions prescribed in EO 792 and the successor EO 1037.

b. Consider utilizing the CMS baseline system to capture the dates of last attendance as a condition to assigning unauthorized withdrawals.

**Management Response**

We concur.

a. No later than December 1, 2009, and by way of coded memorandum from Academic Affairs, campuses will be reminded of the necessity to comply with the withdrawal provisions of EO 1037.

b. The CSU baseline system has been modified to comply with EO 1037. Beginning in October 2009, CMS will capture “last dates of attendance” or an appropriate default date.

**REPORT DELAYED GRADING**

Campuses did not replace the administrative grading symbol RD (Report Delayed) with a substantive grade on a timely basis.

Four of the eight campuses visited had not replaced RD grades within a reasonable time after they were assigned. The number of grades involved ranged from a high of approximately 1,800 grades at the Los Angeles campus to approximately 100 grades at the Long Beach campus. Some of the RD grades were older than three years and others involved students studying abroad.

Policies on the Repetition of Courses, Policies on Academic Renewal, and Grade Appeals, dated September 8, 2008, with an effective date of August 1, 2009, both state the symbol RD may be assigned by the registrar only and, if assigned, shall be replaced by a substantive grading symbol as soon as possible. A RD shall not be used in calculating grade-point average or progress points.

RD grades in the CMS baseline system are not set to automatically lapse or trigger recurring notifications that they are outstanding and need replacement.

Not maintaining an effective campus control system for grading symbols increases the possibility of inaccurate student records.

**Recommendation 7**

We recommend that the chancellor’s office consider utilizing the CMS baseline system to automatically lapse RD grades or trigger recurring notifications that they are outstanding and need replacement.

**Management Response**

We concur. CMS staff will develop and deliver reporting capability to campuses such that grades of “RD” will automatically lapse and trigger reports to faculty and staff. In consultation with CMS staff, Academic Affairs will seek to deliver this functionality by December 1, 2009.

**GRADE APPEALS**

Policies and procedures for grade appeals needed improvement at six of eight campuses visited.

At four campuses, grade appeal cases were not consistently reported on an annual basis to the campus faculty senates and presidents, and two campuses had vacancies for required student membership on grade appeal committees as follows:

<table>
<thead>
<tr>
<th>Campus</th>
<th>Student Members on Committee</th>
<th>Annual Report to Senate and President</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresno</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Long Beach</td>
<td>N</td>
<td>Y</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Monterey Bay</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>San Diego</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>San Marcos</td>
<td>N</td>
<td>Y</td>
</tr>
<tr>
<td>Sonoma</td>
<td>Y</td>
<td>N</td>
</tr>
</tbody>
</table>
Both issues are repeat findings from the prior SRR audit.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated September 1, 2002, and its successor EO 1037, *Grading Symbols, Minimum Standards Governing the Assignment of Grades, Policies on the Repetition of Courses, Policies on Academic Renewal, and Grade Appeals*, dated September 8, 2008, with an effective date of August 1, 2009, both require the campus to establish policies and procedures on grade appeals that provide for student membership on grade appeal committees and annual reporting to the president and faculty senate on the number of grade appeal cases and the disposition of cases heard.

Some campuses had difficulty in getting student appointments to grade appeal committees and most campuses did not make the necessary reports due to oversight.

Lack of appropriate participation and grade appeal reporting could jeopardize protection of students against arbitrary and capricious grading and perpetuate an ineffective process.

**Recommendation 8**

We recommend that the chancellor’s office:

a. Remind the campuses of the reporting procedures for grade appeals and the student membership provisions on grade appeal committees in compliance with EO 792 and the successor EO 1037.

b. Consider monitoring campus compliance with systemwide policies in this area.

**Management Response**

We concur.

a. No later than December 1, 2009, and via coded memorandum, campuses will be reminded of the provisions of EO 1037 with regard to grade appeals including the need for student membership on grade appeal committees.

b. Consideration will be given to the possibility of monitoring campus compliance with the grade appeals provisions of EO 1037. Notification of the outcome(s) of this consideration will be provided by Student Academic Support to the executive vice chancellor with copies to the university auditor no later than June 1, 2010.

**SECURITY OF STUDENT RECORDS**

**STUDENT INFORMATION MANAGEMENT**

Only two of eight campuses had biennially reviewed student information management practices and forwarded the results to the chancellor. Lack of compliance with this requirement – either in
conducting the review or in reporting the results have been habitual issues in prior systemwide audits.

We noted that only the Long Beach and San Diego campuses had performed a biennial review of student information management practices and submitted the results to the chancellor. The San Diego campus report was a one-page memo dated May 9, 2007, which the campus submitted to the senior director for information security management in the chancellor’s office. This review did not identify any specific changes, corrective actions, or improvements resulting from the review process. Several other campuses stated that reviews had occurred; however, they were unable to provide documented evidence of completion.

A biennial review requirement is a reasonable internal control for an issue as important as privacy of student information and prior audits have validated continuation of the review process, but there are questions about whether distribution of the results to the chancellor is appropriate. In addition to this audit, prior systemwide audit reports on this subject have included:

1990 – Student Records (90-01)
In general, campuses were not complying with the biennial review requirement. Office of the Chancellor records indicated that 15 campuses last filed a report in 1983, one in 1990, and there was no copy on file for the remaining three campuses. We found no evidence of Office of the Chancellor action to request this information since 1983. Given these circumstances, we question the continued existence of this requirement.

1999 – Student Records and Registration (99-23)
None of the 11 campuses visited had established procedures to review their student information management practices on a biennial basis.

2004 – Admissions (04-13)
Four of the seven campuses visited either failed to report the results of their student information practices review to the chancellor’s office or reported the results late.

The 1990 audit recommended that the chancellor consider eliminating the biennial reviews. The response was that the reviews should continue but that the chancellor’s office would not request copies of the review reports from the campuses. However, the executive orders have never reflected the change in report distribution.

One of the earliest references to reviewing student information management practices was EO 267, Privacy and Personal Information Management – Student Records Administration, dated April 19, 1977. Sections D.1 and D.2 of this EO stated:

1. Each campus shall establish procedures for reviewing the campus information management practices concerning student records.

2. These reviews shall include, but not be limited to, an analysis of:
OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

a. Appropriateness of campus policy statement on the privacy of student records.

b. Procedures for amending records including hearing procedures.

c. Procedures for disclosing information to students and others with legitimate educational interest.

d. Procedures for recordkeeping.

e. The policy for charging fees for copies of student records.

f. The overall effectiveness of the campus student records policy and this executive order to determine the need for revision of these policies.

EO 382, Privacy and Personal Information Management – Student Records Administration, dated March 10, 1982, superseded EO 267 but retained the same review language. EO 796, Privacy and Personal Information Management Student Record Administration, dated January 1, 2002, superseded EO 382 and was the EO in effect during the audit. EO 796 modified the language of prior executive orders and introduced requirements on the frequency of the reviews and reporting results.

EO 796 states that each campus shall adopt a written policy statement establishing procedures by which the campus intends to comply with FERPA and this executive order. These procedures shall include a requirement to periodically review campus information management practices concerning student records at least every two years, or more often as the need arises. The results of these reviews shall be forwarded to the chancellor by the president and shall include any changes deemed necessary.

New FERPA regulations, effective January 9, 2009, also make significant changes that necessitate close attention to institutional review of student information policies and procedures. Many changes were addressed including:

- More discretion in allowing disclosures to parents and others in cases of a health and safety emergency.

- Requirements for technological, physical, and/or administrative controls to effectively limit access to education records to those with a need to know.

- Limits on certain outsourcing arrangements involving education records.

Many campuses stated that they were unaware of the EO 796 requirement, and if they did do a review, they were uncertain as to who should receive the distribution of the biennial review reports on behalf of the chancellor.
The absence of biennial review and reporting increases the risk of inadequate student record information management practices.

**Recommendation 9**

We recommend that the chancellor’s office:

a. Establish and enforce an effective means of assuring compliance with the EO 796 policy for periodic, but not less frequently than biennial, reviews or eliminate the requirement.

b. Clarify policy on whether the campuses should report the results of the EO 796 reviews to the chancellor and modify executive order language accordingly.

**Management Response**

We concur. Campuses will be reminded in writing of the requirement to review and report on compliance with EO 796 (Privacy and Personal Information Management) on at least a biennial basis, and an Office of the Chancellor destination for that report will be assigned and clearly communicated. This will be accomplished by Academic Affairs no later than December 1, 2009.

**BUSINESS CONTINUITY**

The campuses visited had not generally prepared reasonable business continuity plans for student records and registration. This is a repeat finding from prior systemwide audits related to business continuity planning.

Five of the eight campuses visited had inadequate business continuity plans for student records. Two of the three other campuses had marginal plans, and one campus had a plan that was appreciable better than the other campuses.

In addition to this review, prior systemwide audit reports on this subject included:

- **2003 – Disaster and Contingency Planning (03-35)**

  A process was not in place to measure the effectiveness of business continuity planning by the campuses. None of the nine campuses visited had adequate arrangements for business continuity. Critical processes were not well defined, and related plans were incomplete, except for recovery of information technology.

- **2006 – Disaster and Emergency Preparedness (06-35)**

  Business continuity plans were not fully developed and written at some campuses, while plans at other campuses needed to be reviewed and updated. Seven of the eight campuses visited and the chancellor’s office had not completed a comprehensive review of business continuity needs, including development of an entity-wide business continuity plan. Three campuses had plans for
several departments, four campuses had plans for only one department, and the chancellor’s office did not have a plan. Additionally, at four of the seven campuses where some business continuity plans had been written, we found that not all of the plans had been formally reviewed within 12 months.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that each campus shall develop a business continuity plan with common elements such as annual plan review and as a minimum, biennial testing.

EO 1014, *California State University Business Continuity Program*, dated October 8, 2007, states that each business unit that is determined by the university to provide essential functions shall develop a business continuity plan that reflects sufficient forethought and detail to ensure a high probability of successful maintenance or restoration of essential functions following an unfavorable event.

Neither EO 921 nor EO 1014 establish a time certain for completion of an acceptable business continuity plan.

International Standardization Organization Standard 14.1 states that a business continuity management process should integrate information technology with other factors such as operations, staffing, materials, transport, and facilities.

Business continuity planning at the campuses visited was generally the primary responsibility of someone outside of student records and registration. Staff in the registrar’s offices seemed willing to prepare whatever was requested, but they were waiting for campus direction on what was needed.

The absence of a tested business continuity plan that clearly defines requirements increases risk of ineffective business recovery plans and delayed recovery from disasters and emergencies.

**Recommendation 10**

We recommend that the chancellor’s office:

a. Establish a business continuity plan with specific applicability to student records, require campuses to use the model, and demonstrate completion of the initial planning process by a time certain.

b. Consider requiring peer review and certification of all campus business continuity plans on a regular basis.

**Management Response**

We concur with the following comments:

a. EO 921 and 1014 both assign the development of business continuity plans to campus presidents.
b. EO 1014 indicates that business continuity plans should be developed for all units, which “provide essential functions…” We will ensure that campuses include student records as “an essential function,” if they have not already done so. Coded memoranda to this effect will be issued by December 1, 2009.

c. A reminder of the importance of business continuity plans especially with regard to student records will be provided to each campus president. Specific reference will be made to EO 921 and 1014. In conjunction with the Office of Risk Management, guidance regarding these matters will be provided by Academic Affairs to campus presidents no later than February 1, 2010.

**DOCUMENT IMAGING**

The CSU had neither standardized document imaging systems in student records nor negotiated favorable procurement/maintenance arrangements systemwide.

At the eight campuses visited, some campuses like San Diego had embraced document imaging for student records and independently acquired the necessary equipment and system software. Other campuses such as Sonoma had not adopted any imaging technology for student records due to cost considerations. Overall, there were a variety of different document imaging systems and applications. However, the predominant systems in student records and registration were Singularity by Hershey Business Systems and ImageNow from Perceptive Software. Differences among the campuses in document imaging for student records and registration were noted as follows:

<table>
<thead>
<tr>
<th>Campus</th>
<th>Extent of Document Imaging/Storing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresno</td>
<td>Singularity by Hershey Business Systems</td>
</tr>
<tr>
<td>Long Beach</td>
<td>Singularity by Hershey Business Systems plus OnDemand by IBM for old records from the legacy mainframe system</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>No document imaging in student records – campus is microfilming on a quarterly basis</td>
</tr>
<tr>
<td>Monterey Bay</td>
<td>Singularity by Hershey Business Systems acquired but not yet implemented for student records</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>Some scanning (mainly transcripts received from other institutions) using Singularity by Hershey Business Systems</td>
</tr>
<tr>
<td>San Diego</td>
<td>Singularity by Hershey Business Systems</td>
</tr>
<tr>
<td>San Marcos</td>
<td>No document imaging in student records</td>
</tr>
<tr>
<td>Sonoma</td>
<td>No document imaging in the registrar’s office – although business affairs has deployed Singularity by Hershey Business Systems</td>
</tr>
</tbody>
</table>

During the course of the audit, we also requested that the chancellor’s office conduct an informal systemwide survey of document imaging systems among the affinity group members for student records to identify: a) what other systems might already be in use, and b) how the campuses used imaging for student records and registration recordkeeping. Only six additional campuses replied and the responses varied as follows:
### Extent of Document Imaging for Student Records

<table>
<thead>
<tr>
<th>Campus</th>
<th>Extent of Document Imaging for Student Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bakersfield</td>
<td>Discontinuing use of Singularity by Hershey Business Systems and moving to ImageNow from Perceptive Software in summer 2008.</td>
</tr>
<tr>
<td>Chico</td>
<td>ImageNow from Perceptive Software</td>
</tr>
<tr>
<td>Fullerton</td>
<td>Combination of FileNET from IBM plus limited use of Singularity by Hershey Business Systems for transcripts</td>
</tr>
<tr>
<td>Sacramento</td>
<td>Optix from Mindwrap plus Singularity by Hershey Business Systems for transcripts</td>
</tr>
<tr>
<td>San Luis Obispo</td>
<td>ImageNow from Perceptive Software</td>
</tr>
<tr>
<td>San José</td>
<td>Nolij by Nolij Corporation</td>
</tr>
</tbody>
</table>

The American Association of Collegiate Registrars and Admissions Officers (AACRAO) publication, *Registrar’s Guide: Evolving Best Practices in Records and Registration*, states that a good records management program needs to collect, store, and make records available in an efficient yet cost-effective manner.

GC §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

Section 204 of the *CSU Policy Manual for Contracting and Procurement* states that it is the policy of the CSU to seek and to achieve discounts and to reduce administrative costs through the use of volume purchasing programs and multiple sourcing opportunities. To that end, the CSU is committed to maximizing purchasing leverage through collaborative, joint, and strategic sourcing activity.

The director of contracts and procurement in the chancellor’s office stated that a prior initiative to establish a systemwide procurement contract for document imaging failed because the campuses were all at different stages in terms of their ability to implement a common system.

Not utilizing document imaging for maintaining student records fails to take advantage of current technologies to improve efficiency. Independently negotiating document imaging arrangements by individual campuses is costly and inefficient and does not effectively utilize the purchasing power of the CSU.

**Recommendation 11**

We recommend that the chancellor’s office:

a. Reassess the use of document imaging for student records.

b. Consider establishing system standards for required use of available technology.
c. Re-evaluate the merits of a systemwide arrangement for acquisition and maintenance of imaging equipment and software.

Management Response

Given the current budget situation, the resulting decrease in available resources and the existing large-scale campus investments in document imaging, the recommendations of the auditor are not feasible in the near term.

a. The use of document imaging for the storage and retrieval of student records is undeniably an attractive concept.

b. Since the document imaging products of at least six different vendors are already in use on CSU campuses, it may be too late and too expensive to try to establish standards.

c. Should a systemwide or multicampus effort be undertaken, Systemwide Contract Services and Procurement is ready to work with campuses to develop systemwide arrangements, e.g., group pricing for document imaging and related services.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Office of the Chancellor</strong></td>
<td></td>
</tr>
<tr>
<td>Jeri Echeverria</td>
<td>Executive Vice Chancellor and Chief Academic Officer</td>
</tr>
<tr>
<td>Gary W. Reichard</td>
<td>Executive Vice Chancellor and Chief Academic Officer (At time of review)</td>
</tr>
<tr>
<td>Ron Basich</td>
<td>Director, Corporate Information Systems</td>
</tr>
<tr>
<td>Sue Bell-Ramirez</td>
<td>Assistant Director of Administration</td>
</tr>
<tr>
<td>Jim Blackburn</td>
<td>Director, Enrollment Management Services</td>
</tr>
<tr>
<td>Philip Garcia</td>
<td>Senior Director of Analytic Studies</td>
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<tr>
<td>Marilyn Green</td>
<td>Data Analyst</td>
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<tr>
<td>Allison Jones</td>
<td>Assistant Vice Chancellor, Student Academic Support</td>
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<tr>
<td>Dean Kulju</td>
<td>Director, Student Financial Aid Services and Programs</td>
</tr>
<tr>
<td>Janice Lim</td>
<td>Senior Director, Information Security Management</td>
</tr>
<tr>
<td>Jeanine Lussier</td>
<td>Document and Training Project Director, Common Management Systems, Enterprise Resources</td>
</tr>
<tr>
<td>Monica Malhotra</td>
<td>Associate Director, Analytic Studies</td>
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<tr>
<td>George Mansoor</td>
<td>Director, Enterprise Technical Services</td>
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<tr>
<td>Mick McBride</td>
<td>Student Administration Project Director</td>
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<tr>
<td>Ray Murillo</td>
<td>Associate Director, Student Programs</td>
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<tr>
<td>Kevin O’Connor</td>
<td>Student Administration Application Support Manager</td>
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<tr>
<td>Tom Roberts</td>
<td>Director, Contracts and Procurement</td>
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<tr>
<td>Marlene Rosenfeld</td>
<td>Student Administration Application Support Manager</td>
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<tr>
<td>Lorie Roth</td>
<td>Assistant Vice Chancellor, Academic Programs</td>
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<tr>
<td>Dawn Theodora</td>
<td>University Counsel</td>
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<tr>
<td>Leo Van Cleve</td>
<td>Director, International Programs</td>
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<tr>
<td><strong>California State University, Fresno</strong></td>
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<tr>
<td>John Welty</td>
<td>President</td>
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<tr>
<td>Matt Babick</td>
<td>Internal Auditor</td>
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<tr>
<td>Tina Beddall</td>
<td>Registrar</td>
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<tr>
<td>John Briar</td>
<td>Director, Campus Information Systems</td>
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<tr>
<td>Lydia Duarte</td>
<td>Administrative Assistant</td>
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<tr>
<td>Vivian Franco</td>
<td>Director, Admissions, Records and Evaluations</td>
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<tr>
<td>Gary Hensley</td>
<td>PeopleSoft Security Administrator</td>
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<tr>
<td>John Howell</td>
<td>Information Systems Analyst</td>
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<tr>
<td>Ellen Klute</td>
<td>Assistant Registrar</td>
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<tr>
<td>Dennis Nef</td>
<td>Associate Vice President, Dean of Undergraduate Studies</td>
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<tr>
<td>Paul Oliaro</td>
<td>Vice President for Student Affairs</td>
</tr>
<tr>
<td>Cynthia Teniente-Matson</td>
<td>Vice President for Administration and Chief Financial Officer</td>
</tr>
<tr>
<td>Pat Tift</td>
<td>Confidential Analyst, Office of the Vice President for Administration</td>
</tr>
<tr>
<td>Bernie Vinovrski</td>
<td>Assistant Vice President for Enrollment Services</td>
</tr>
</tbody>
</table>
APPENDIX A: PERSONNEL CONTACTED

California State University, Long Beach

F. King Alexander               President
Nancy Cohn                      Records Manager, Enrollment Services (ES)
Debra Covey                     Transcript Technician, ES
Linda Dixon                     Office Manager, Mathematics
Jennifer Dizon                  Document and Training Specialist, Academic Support
Tom Enders                      Associate Vice President, ES
Jack Farrell                    Director, Evaluations and Records
Laurinda Fuller                 Senior Internal Auditor
Catherine Gottlieb              Business Continuity Specialist
Donna Green                     Director of Academic Support and Student Relations
Nathan Jensen                   Senior Director, Center for International Education
Mishelle Laws                   Assistant Vice President, Quality Improvement
Cecile Lindsay                  Vice Provost, Academic Affairs
Leah Nieto                      Assistant Director of Academic Support
Shannon O’Connell               Management Support Specialist
Aysu Spruill                    Director, Internal Auditing Services
Mary Stephens                   Vice President, Administration and Finance
Loretta Young                   Internal Auditing Analyst

California State University, Los Angeles

James M. Rosser                 President
Kathy Anderson                   Assistant to the Registrar
Susan Cash                       Associate Vice President, Academic Affairs
Bill Chang                       Director, Common Management Systems and Enterprise Systems
Letycia Gomez                    Judicial Affairs Officer
Tanya Ho                         University Internal Auditor
Michele Jordan                   Compliance Officer
Do Hyun Kwon                     Software Integration Engineer, Information Technology Services
Christine Leung                  Senior Internal Auditor
Juanita Lewis                   Administrative Assistant
Beverly Mitchum                 Director, Information Technology Security Management
Sheryl Okuno                     Director, Information Technology, Security and Compliance
George Pardon                   Vice President, Administration and Chief Financial Officer
Mark Robinson                   Associate Director, Institutional Research
Tony Ross                       Vice President, Student Affairs
Lianne Salerno                  Administrative Assistant
Mae Santos                      Director, University Budget
Arlie Stops                     Assistant Vice President, Student Affairs
Joan Woosley                    University Registrar and Director of Enrollment Services
APPENDIX A: PERSONNEL CONTACTED

California State University, Monterey Bay
Dianne F. Harrison President
Mary Boyce Associate Vice President for Academic Planning and Institutional Effectiveness
Janine De Leon Admissions and Records System Support Technician
Art Evjen Director of Business and Support Services
Pete Fernandez Student Information Systems Analyst
John Fitzgibbon Associate Vice President for Finance
Christine Frederick Cashiering and Student Accounting Services Manager
Gretchen Fuentes Director of Human Resources Operations
Monica Galligan Human Resources Systems Manager
Sheila Hernandez University Registrar
Ronnie Higgs Associate Vice President for Enrollment Management and Interim Vice President for Student Affairs
Asuman Johnson Associate Director, Information Systems and CMS Project Director
David Linnevers Director, Admissions and Recruitment
James Main Vice President for Administration and Finance
Cynthia Olvera Records and Registration Coordinator
Christin Strang-Lopez Assistant Registrar
Elvia Urbano Administrative Support Coordinator

California State University, San Bernardino
Albert K. Karnig President
Laura Carrizales Information Security Analyst
Nadine Chavez Director, Educational Opportunity Program
Mary Chouinard Associate Director, Records, Registration and Evaluation (RRE)
Victoria Coffey Lead Program Assistant, Program Advising Worksheet for Students
Khalil Daneshvar Staff Analyst/Programmer, Enrollment Services Technical Support
David DeMauro Vice President, Administration and Finance
Sunny Lin Analyst/Programmer, Administrative Computing Services
Bob McGowan Associate Vice President, Enrollment Services
Lydia Ortega Director, RRE
Linda Pella-Hartley Executive Assistant to Vice President, Administration and Finance
Arlene Reed Acting Associate Director of Admissions and Operation
Frank Rincon Vice President, Student Affairs
Shasta Sardet Administrative Support Assistant
Craig Schott Administrative Support Assistant, Educational Opportunity Program
Carl Shiinoki Information Technology Consultant, Administration and Finance - Technical Services
Charlie Tabbut Director, Administrative Computing Services/ Common Management Systems
Sherry Toman Manager, Student Accounts Office
Lenora Venturina Student Affairs, Analyst/Programmer
San Diego State University
Stephen L. Weber President
Jackie Booth Lecturer, Child and Family Development and Chair, Student Grievance Committee
Scott Burns Associate Vice President, Financial Operations
Valerie Carter Director of Audit and Tax
Sandra Cook Executive Director, Enrollment Services
David Del Rio Manager, Distribution Services
Sally Farris Director of Analytical Studies and Institutional Research
Rita Gajoli Associate Executive Director, Enrollment Services
Cathy Garcia Manager, Contracts and Procurement Management
Pat Geniza Lead Analyst/Programmer, Operations
Arlene Gibbs Director, The Center for Human Resources
Javier Gudino Director, Web Systems
Dennis Guerra Operating System Analyst
Merle Harmon Associate Registrar
Bill Lee Lead Analyst/Programmer
Kristina Moller Business Process Analyst
Rick Nornholm Director, Enrollment Services, Information Technology
Mary Ann Patty Manager, University Cashiers
Lawrence Peralez Director of Business Services
Karla Ramirez Administrative Support Coordinator, Office of the Ombudsman
Susan Reyes Analyst/Programmer, Singularity
John Ross Information Technology Coordinator, Academic Affairs
Sally Roush Vice President, Business and Financial Affairs
Cassie Steadman Director, Advising and Evaluations
Richel Thaler Associate Vice President, Administration
Jennifer Vaske Administrative Assistant
Felicia Vlahos Information Security Officer
Jeff Wal Accountant II
Rayanne Williams Registrar
Lisa Winters Compensation and Payroll Manager

California State University, San Marcos
Karen S. Haynes President
Evelyn Andrews Director of Registration & Records/Registrar
David Barsky Associate Vice President, Academic Programs
Candace Bebee Assistant to Vice President, Finance and Administrative Services
Darren Bush Associate Vice President, Enrollment Management Services
Jim Carr Lead, Materials Management
James Garrison Director of Operations, Enrollment Management Services
April Grommo Director, Information Technology Project Office
Linda Hawk Vice President, Finance and Administrative Services
Teresa Macklin Information Security Officer
Dean Manship Manager, Emergency Management - University Police
Jeffrey Marks Research Analyst, Institutional Planning and Analysis
Janice Plemons Risk Analyst and Workers' Compensation Coordinator
APPENDIX A: PERSONNEL CONTACTED

California State University, San Marcos (cont.)
Katy Rees          Director, Strategic Planning and Administrative Services
Patricia Worden    Vice President for Student Affairs

Sonoma State University
Ruben Armiñana    President
Leo Alvillar       Student Administration System Coordinator, Common Management Systems (CMS)
Bruce Boyer        Associate Director, Disabled Student Services
L. Rose Bruce      Associate Vice President, Institutional Research
Letitia Coate      Controller
Peter Flores       CMS Security Administrator
Larry Furukawa-Schlereth Vice President, Administration and Finance
Susan Gutierrez    Director of Financial Aid
Laurel Holmstrom   Academic Senate Analyst
Sean Johnson       Assistant Registrar
Kurt Koehle        Director, Internal Operations Analysis and Review
Matthew Lopez-Phillips Acting Vice President, Student Affairs and Enrollment Management
Richard Ludmerer   Senior Director for Risk Management
Lisa Noto          University Registrar
Gloria Ogg         Senior Director for University Business Services
Paul Santini       Deputy Controller, Student Finance
Elaine Sundberg    Associate Vice Provost, Academic Programs and Graduate Studies
Jason Wenrick      Senior Director, CMS
MEMORANDUM

DATE: October 14, 2009

TO: Mr. Larry Mandel
    University Auditor

FROM: Jeri Echeverria
       Executive Vice Chancellor and Chief Academic Officer

SUBJECT: Management Response to Recommendations of Audit Report Number 08-35,
         Student Records and Registrations, Systemwide (as Revised October 2009)

Thank you for your July 29, 2009 memorandum transmitting the draft audit report Number 08-35,
Student Records and Registrations, Systemwide and Mr. Usher’s suggested revision of September 1,
2009. A printed copy of the recommendations with our management response is enclosed. Our response
was developed in consultation with the offices of Contracts and Procurement, Risk Management, General
Counsel, and Information Technology. We have attempted to respond affirmatively to the concerns
mentioned in Mr. Usher’s communication of 9/1/09.

We appreciate both the work and the recommendations of the Office of the University Auditor. The
recommendations and our corrective action plan will strengthen the effectiveness of our efforts to
support campus student records and registration offices across the CSU.

JE/je

Enclosure

cc: Dr. Charles B. Reed, Chancellor
    Dr. Benjamin Quillian, Executive Vice Chancellor and Chief Financial Officer
    Mr. Allison G. Jones, Assistant Vice Chancellor
    Dr. James C. Blackburn, Director, Enrollment Management Services
    Mr. George Ashkar, Interim Assistant Vice Chancellor -- Controller
    Mr. Amir Dabirian, Assistant Vice Chancellor, ITS & Chief Information Officer
    Mr. Jim Usher, Audit Manager
STUDENT RECORDS AND REGISTRATION

SYSTEMWIDE

Audit Report 08-35

GENERAL ENVIRONMENT

Recommendation 1

We recommend that the Chancellor’s Office issue systemwide policies on the extent of information the campuses should release in response to recent PRA requests for grade distribution. Consideration should be given to including these policies in existing documents such as Executive Order (EO) 796 that currently addresses privacy and personal information management for student records administration.

Management Response

After consultation with the Office of the CSU General Counsel, we believe that the matter of Public Records Act requests has already been addressed.

a. In its Records Access Manual, the CSU Office of the General Counsel has provided guidance and procedures for use by campuses in the event of PRA requests. That information is found on page 6 of that document.

"Each campus should have a central contact point for coordination of Public Records Act requests. The CSU General Counsel should be notified of all incoming requests, so they can be coordinated throughout the system. Each campus should respond to requests for records maintained at that campus. University Counsel is available to respond to questions and provide advice."

b. In short, the Office of General Counsel (OGC) has already provided both policy and guidance regarding PRA requests. Presidents and registrars will be reminded by memorandum of the availability of the OGC’s Records Access Manual no later than January 1, 2010.

REGISTRATION

Recommendation 2

We recommend that the Chancellor’s Office:

a. Establish a policy requiring campuses to monitor changes in registration holds/priorities.

b. Consider identifying a working group of campus personnel and CMS Central to review the feasibility and cost-effectiveness of building and monitoring capabilities for registration holds/priorities into the CMS baseline system or formally adopting a better method.
Management Response

We concur.

a. A policy requiring campuses to monitor changes in registration priority will be established and communicated by January 2010.

b. Academic Affairs staff and campus representatives will work with CMS Central to review the feasibility and cost effectiveness of providing “baseline” capability for the monitoring of changes in registration priority. In the mean time, CMS campuses have already provided CMS Central methods for assigning registration priority as well as the local capability to generate reports, which may be used to monitor registration priorities. Work on this project will be completed by February 1, 2010.

GRADING/RECORD ACCURACY AND INTEGRITY

UNAUTHORIZED GRADING SYMBOLS

Recommendation 3

We recommend that the Chancellor’s Office consider utilizing the CMS baseline system to enforce current business rules limiting the campuses to unauthorized grading symbols.

Management Response

We concur with the following caveats:

a. It is probably neither wise nor practical to “revise history” by removing or making substitutions for the unauthorized grades, which are already parts of individual student records.

b. CMS modifications needed to “enforce current business rules...” would involve costs for which current funding may not be available. Student Academic Support staff will consult with CMS baseline staff to determine if any cost effective options may be available for the use of CMS baseline to control the use of unauthorized grading symbols.

c. Academic Affairs will bring CMS as well as Chancellor’s Office and representative campus staff together no later than January of 2010, and an analysis of the efficacy and cost of the indicated modification will be provided by March 1, 2010.

GRADE CHANGES

Recommendation 4

We recommend that the Chancellor’s Office:

a. Establish systemwide policies and procedures for grade changes that include, but are not limited to, a standard of comparison for the maximum number of users on each campus that need the capability to change grades; systematic review, approval, and documentation of grade change
audit reports; and the use of effective turnaround documents to notify instructors of grade changes.

b. Consider utilizing the CMS baseline to produce system-generated notices to instructors of record on grade changes.

Management Response

We concur and note the following:

a. Prior to February 2010, systemwide policy regarding the maximum number of users with “grade change” capability, systemwide review of grade change documentation and the inclusion of effective notice to instructors in the event of grade changes will be drafted. After appropriate consultation with campus representatives such a policy will be finalized and distributed prior to June 2010.

b. Consideration will be given to the use of CMS baseline to produce automatically generated notification of grade changes. (The cost of a systemwide procedure is likely to be moderate, but CMS leadership perceives the feasibility of a Systemwide solution may be low.

c. Computerized local solutions may also not be cost effective in the current fiscal environment.

d. Prior to January 1, 2010, Academic Affairs will convene internal and CO CMS staff to analyze the potential for using CMS to notify instructors of grade changes. A report of the feasibility and estimated cost of such functionality will be provided by Student Academic Support and CMS Central no later than April 1, 2010.

INCOMPLETES

Recommendation 5

We recommend that the Chancellor’s Office consider utilizing the CMS baseline system to facilitate completion of incomplete agreements.

Management Response

We concur.

The upcoming release of modifications to CMS baseline (October 2009) will include capability to implement this recommendation. Academic Affairs staff will meet with CMS Central staff in January 2010 to assess the progress towards campuses “being able to facilitate the completion of incomplete agreements.”

WITHDRAWALS

Recommendation 6

We recommend that the Chancellor’s Office:

a. Remind the campuses to comply with withdrawal provisions prescribed in EO 792 and the successor EO 1037.
b. Consider utilizing the CMS baseline system to capture the dates of last attendance as a condition to assigning unauthorized withdrawals.

Management Response

We concur.

a. No later than December 1, 2009 and by way of coded memorandum from Academic Affairs, campuses will be reminded of the necessity to comply with the withdrawal provisions of Executive Order 1037.

b. The CSU baseline system has been modified to comply with Executive Order 1037. Beginning in October 2009, CMS will capture “last dates of attendance” or an appropriate default date.

REPORT DELAYED GRADING

Recommendation 7

We recommend that the Chancellor’s Office consider utilizing the CMS baseline system to automatically lapse RD grades or trigger recurring notifications that they are outstanding and need replacement.

Management Response

We concur.

CMS staff will develop and deliver reporting capability to campuses such that grades of “RD” will automatically lapse and trigger reports to faculty and staff. In consultation with CMS staff, Academic Affairs will seek to deliver this functionality by December 1, 2009.

GRADE APPEALS

Recommendation 8

We recommend that the Chancellor’s Office:

a. Remind the campuses of the reporting procedures for grade appeals and the student membership provisions on grade appeal committees in compliance with EO 792 and the successor EO 1037.

b. Consider monitoring campus compliance with systemwide policies in this area.

Management Response

We concur.

a. No later than December 1, 2009 and via coded memorandum, campuses will be reminded of the provisions of Executive Order 1037 with regard to grade appeals including the need for student membership on grade appeal committees.
b. Consideration will be given to the possibility of monitoring campus compliance with the grade appeals provisions of EO 1037. Notification of the outcome(s) of this consideration will be provided by Student Academic Support to the Executive Vice Chancellor with copies to the University Auditor no later than June 1, 2010.

SECURITY OF STUDENT RECORDS

STUDENT INFORMATION MANAGEMENT

Recommendation 9

We recommend that the Chancellor’s Office:

a. Establish and enforce an effective means of assuring compliance with the EO 796 policy for periodic, but not less frequently than biennial, reviews or eliminate the requirement.

b. Clarify policy on whether the campuses should report the results of the EO 796 reviews to the chancellor and modify executive order language accordingly.

Management Response

We concur.

Campuses will be reminded in writing of the requirement to review and report on compliance with Executive Order 796 (Privacy and Personal Information Management) on at least a biennial basis, and an Office of the Chancellor destination for that report will be assigned and clearly communicated. This will be accomplished by Academic Affairs no later than December 1, 2009.

BUSINESS CONTINUITY

Recommendation 10

We recommend that the Chancellor’s Office:

a. Establish a business continuity plan with specific applicability to student records, require campuses to use the model, and demonstrate completion of the initial planning process by a time certain.

b. Consider requiring peer review and certification of all campus business continuity plans on a regular basis.

Management Response

We concur with the following comments:

a. Executive Orders 921 and 1014 both assign the development of business continuity plans to campus presidents.
b. Executive Order 1014 indicates that business continuity plans should be developed for all units, which "provide essential functions..." We will ensure that campuses include student records as "an essential function," if they have not already done so. Coded memoranda to this effect will be issued by December 1, 2009.

c. A reminder of the importance of business continuity plans especially with regard to student records will be provided to each campus president. Specific reference will be made to Executive Orders 921 and 1014. In conjunction with the Office of Risk Management, guidance regarding these matters will be provided by Academic Affairs to campus presidents no later than February 1, 2010.

**DOCUMENT IMAGING**

**Recommendation 11**

We recommend that the Chancellor’s Office:

a. Reassess the use of document imaging for student records.

b. Consider establishing system standards for required use of available technology.

c. Re-evaluate the merits of a systemwide arrangement for acquisition and maintenance of imaging equipment and software.

**Management Response**

Given the current budget situation, the resulting decrease in available resources and the existing large-scale campus investments in document imaging, the recommendations of the auditor are not feasible in the near term.

a. The use of document imaging for the storage and retrieval of student records is undeniably an attractive concept.

b. Since the document imaging products of at least six different vendors are already in use on CSU campuses, it may be too late and too expensive to try to establish standards.

c. Should a systemwide or multi-campus effort be undertaken, Systemwide Contract Services and Procurement is ready to work with campuses to develop systemwide arrangements, e.g., group pricing for document imaging and related services.
November 9, 2009

MEMORANDUM

TO: Mr. Larry Mandel
   University Auditor

FROM: Charles B. Reed
      Chancellor

SUBJECT: Draft Final Report 08-35 on Student Records and Registration, Systemwide

In response to your memorandum of November 9, 2009, I accept the response as submitted with the draft final report on Student Records and Registration, Systemwide.

CBR/amd