

STUDENT RECORDS AND REGISTRATION

SAN DIEGO STATE UNIVERSITY

**Audit Report 08-36
October 13, 2008**

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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)
I Grade	Incomplete
ISO	International Standardization Organization
IT	Information Technology
OFIS	Office Furniture Installation Services
RD Grade	Report Delayed
SAM	State Administrative Manual
SDSU	San Diego State University
SIMS/R	Student Information Management System/Relational
SRR	Student Records and Registration
UCO	University Computing Operations
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 the San Diego State University campus from February 25, 2008, through May 9, 2008, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on SRR controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls of SRR in effect as of May 9, 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 satisfactory. Numbers in brackets [] refer to page numbers in the report.

REGISTRATION [5]

The campus did not review changes in registration holds or registration priorities for questionable transactions.

GRADING/RECORD ACCURACY AND INTEGRITY [6]

There was a lack of clarity on who had received the president's designation to approve withdrawals in the last 20 percent of instruction, and grade appeal cases were not reported annually to the campus faculty senate and president.

SECURITY OF STUDENT RECORDS [8]

The campus did not disable or suspend access privileges for inactive Student Information Management System/Relational accounts, accountability for boxes containing confidential student information designated for shredding was inconsistent, and transcript fee revenue was not reconciled to the number of official transcripts issued. In addition, the campus had neither physically secured the computers hosting the Singularity database nor stored backups off-site, and enrollment services did not have a business continuity plan.

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 CMS application is 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 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 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. At the campuses, the registrar is typically the office responsible for registration and student records. At San Diego State University, the registrar is part of enrollment services (ES). The executive director of ES reports to the associate vice president of academic affairs.

PURPOSE

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Student Records and Registration*.

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.

SCOPE AND METHODOLOGY

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 *Student Records and Registration* 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 from July 1, 2007, through June 30, 2008.

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.
- ▶ 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 CAMPUS RESPONSES

REGISTRATION

The campus did not review changes in registration holds or registration priorities for questionable transactions.

Two important components in the system for registering students are the use of registration holds and priorities assigned for early registration.

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. Our review disclosed that approximately 166 users have access to applicable Student Information Management System/Relational (SIMS/R) screens for update purposes; however, the program does not track changes in registration holds to detect unauthorized transactions to temporarily suspend a hold and enable invalid student registrations.

Registration Priorities

Registration priorities are valuable commodities that assure individual students can get classes at the most desirable days/times and/or popular professors. The San Diego State University (SDSU) senate recently addressed registration priorities and reduced the number of groups effective with the fall 2007 registration cycle. Currently, disabled students, student-athletes, student government officers, and students representing the campus as student ambassadors are the highest registration priorities and the lowest registration priorities are sophomores, third-semester freshmen, and students in the senior citizen program.

Our review disclosed that approximately 66 staff with SIMS/R authorizations to screen S18 can manually change the registration dates and times; however, the program does not track which staff made changes or which students benefitted from a change that would have enabled them to register earlier than scheduled.

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.

The academic affairs information technology (IT) coordinator stated that the capability to audit or track changes in registration holds and priorities would require programming in SIMS/R. The registrar stated that staff was instructed to minimize changes.

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 cut

backs in class section capacity and other factors make it increasingly more difficult for students with low registration priorities to get classes they need.

Recommendation 1

We recommend that the campus review changes in registration holds and registration priorities for questionable transactions during the registration windows when it would be advantageous for such changes to occur.

Campus Response

We concur. The university will establish a process to review changes in registration holds and priorities. The initial process review will be completed by January 30, 2009.

GRADING/RECORD ACCURACY AND INTEGRITY

LATE WITHDRAWALS

There was a lack of clarity on who had received the president's designation to approve withdrawals in the last 20 percent of instruction.

The campus process for approval of late schedule adjustments requires the same number of signatures regardless of when the transaction occurs. In chronological order, the form is approved by the instructor, then an office of the registrar designee (typically the registrar), and finally by an assistant dean or designee. There are no additional signatures required in the last 20 percent of instruction.

Executive Order (EO) 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, distinguishes between a) withdrawals after census and prior to the last 20 percent of instruction and b) withdrawals during the last 20 percent of instruction. In the former, there is a requirement to document a serious and compelling reason and secure a minimum of two approvals — the instructor and the department chair and/or dean. In the latter, a more restrictive cause that is clearly beyond the student's control is required for the withdrawal. An academic administrator appointed by the president to act in such matters must also approve requests in the last 20 percent of instruction.

The registrar stated that they fully vetted the existing process for withdrawals.

Lack of review by an academic administrator appointed by the president could unreasonably subject students to inconsistent policy interpretation and result in late withdrawals without appropriate justification.

Recommendation 2

We recommend that the campus:

- a. Clearly establish the intention of the president on who is the academic administrator authorized to approve withdrawals in the last 20 percent of instruction.
- b. Require a signature by the president's designee when the withdrawal occurs in the last 20 percent of instruction.

Campus Response

We concur.

- a. The university will identify an academic administrator, appointed by the president, who will approve withdrawal requests in the last 20 percent of instruction.
- b. The selection of an academic administrator and written approval process will be completed by February 27, 2009.

GRADE APPEALS

Grade appeal cases were not reported annually to the campus faculty senate and president.

The Office of the Ombudsman at SDSU oversees the campus process for grade appeals that specifically involves the student grievance committee, a standing committee of the university's faculty senate.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 21, 2001, requires the campus to establish policies and procedures on grade appeals that provide for annual reporting to the president and faculty senate on the number of grade appeal cases and the disposition of cases heard.

The registrar stated that there had been some recent turnover in the ombudsman position and changes in committee membership.

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

Recommendation 3

We recommend that the campus make annual reports of grade appeals to the faculty senate and president.

Campus Response

We concur. The university will report grade appeals cases annually. A process will be established by March 31, 2009.

SECURITY OF STUDENT RECORDS

INACTIVE ACCOUNTS

The campus did not disable or suspend access privileges for inactive SIMS/R accounts.

SIMS/R is a complex system, which at the time of our visit had 127 roles accommodating the access needs of 739 users. The campus maintains security manually through request documents for new users and periodic reviews/reconciliations with human resources rosters.

The International Standardization Organization (ISO) standard 8.3.3 states that the access rights of all employees, contractors, and third-party users should be removed upon termination of their employment, contract or agreement, or adjusted upon change. Additionally, ISO standard 11.2.1 states that there should be a formal user registration and de-registration procedure in place for granting and revoking access including regular checks for unused or out-of-date user accounts.

A best practice stated in the California State Information Security Office, *Information Security Program Guide for State Agencies*, dated October 2007, is that agencies remove access upon employee termination or when the need no longer exists.

The registrar stated that the campus had SIMS/R users whose access needs were infrequent and there was not a consensus on the frequency of use required to demonstrate continuing access.

Inactive accounts increase the risk of inappropriate access and unauthorized disclosure of protected student information.

Recommendation 4

We recommend that the campus disable or suspend accounts that are inactive for extended periods.

Campus Response

We concur. The university will establish a process to disable or suspend inactive accounts by January 30, 2009.

SECURED SHREDDING

Accountability for boxes containing confidential student information designated for shredding was inconsistent.

Enrollment services (ES) imaged documents containing confidential student information and then discarded the documents through business services. The arrangement included the following:

- ▶ ES located cardboard boxes to accumulate documents in two locations in the Student Services West Building.
- ▶ Once per week, a contract service provider, Office Furniture Installation Services (OFIS), picked up the ES boxes and transported them to a loading dock in the business services building across campus. OFIS counted the number of ES boxes and marked the count on a moving services request form.
- ▶ Building services combined the ES boxes with boxes received from all other campus locations onto a pallet and shrink-wrapped the pallets in a secured storage location.
- ▶ When enough pallets accumulated, business services called a second contract service provider (Cintas) to pick them up. Cintas took the pallets to an off-campus location for shredding and left business services with a certificate of destruction for the number of pallets picked up.

Our review disclosed that there was no method of assurance that ES boxes were palletized.

The Family Educational Rights and Privacy Act of 1974 establishes a duty and obligation to protect disclosure of personally identifiable student information such as what is contained in documents discarded by ES for shredding.

SAM §1693 states that agencies must send a state employee to witness destruction of confidential records when using the service of private contractors.

The registrar stated that she was unaware of a requirement to account for the number of boxes picked up by business services for vendor serviced shredding.

Inadequate accountability for custody of documents submitted for shredding increase the risk of disclosure of confidential student information.

Recommendation 5

We recommend that the campus improve accountability when shredding documents with confidential student information.

Campus Response

We concur. The university has revised its process for shredding confidential documents.

TRANSCRIPT FEE RECONCILIATION

The campus had not reconciled transcript fee revenues to the number of official transcripts issued.

There is a multi-tiered fee structure for issuing official transcripts as follows:

Transcript Type	Number of Transcripts	Cost
Regular	1	\$4
	2 – 10 (prepared at the same time)	\$2 each
	11 or more (prepared at the same time)	\$1 each
On Demand (Rush)	1	\$20
	Each additional one prepared at the same time	\$5 each

During the period of July 2007 to March 2008, the cashier processed 23,626 regular transcript transactions and collected \$134,829, and the registrar printed 48,120 regular transcripts. During this same period, the cashier processed 1,264 rush transcript transactions and collected \$23,073 and the registrar printed 1,519 rush transcripts. Overall, there should be a relationship between transcript fee revenue and the number of official transcripts issued and the absence of reconciliation increases the risk of the campus issuing official transcripts without student authorization and proper fee payment.

SAM §20050 states that the elements of a satisfactory system of internal accounting and administrative controls include a system of authorization and recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

Government Code §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.

The manager of university cashiers stated that they were unaware of any reconciliation requirement for transcript fees.

Failure to reconcile fees in a timely and complete manner increases the risk that errors and irregularities will not be detected and compromises accountability.

Recommendation 6

We recommend that the campus reconcile transcript fees to the total number of transcripts issued.

Campus Response

We concur. The university will begin reconciling transcript fee revenues. Spring 2008 will be used for the initial reconciliation and will be completed by March 31, 2009.

SERVER SECURITY

The campus had neither physically secured the computers hosting the Singularity database nor stored backups off-site.

Singularity by Hershey Business Systems is a document imaging application and database used for management of confidential student records. Although there had been a request to move the Singularity servers into the University Computing Operations (UCO) machine room, they were, at the time of the audit visit, still located in a small, unattended server room near the ES IT staff. Although the campus backed up Singularity regularly to tape in the existing server room, the tapes were not stored off-site.

SAM §5300.3 requires state agencies to provide for the proper use and protection of its information assets.

International Standardization Organization standard 9.2.1 states that equipment should be cited or protected to reduce the risks from environmental threats and hazards, and opportunities for unauthorized access. Additionally, ISO standard 10.5.1 states that backups should be stored in a remote location a sufficient distance to escape from a disaster at the main site.

The academic affairs IT coordinator stated that they had not yet moved the Singularity servers pending resolution of technical issues with UCO capacity and that once inside UCO, the backup routine would change accordingly.

Inadequate physical security of computers increases the risk of inappropriate access to confidential student records. Lack of off-site backups increases the risk that the campus will not be able to recover from a disaster.

Recommendation 7

We recommend that the campus improve the physical security of computers hosting the Singularity application and store the backups at an off-site location.

Campus Response

We concur. Storage of backups to an off-site location has been implemented. The Singularity application and database servers will be relocated by January 30, 2009.

BUSINESS CONTINUITY

ES did not have a business continuity plan.

The operations area of ES relied on IT for business continuity that consisted primarily of restoration of files/systems from backup medium on existing equipment.

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.

ISO standard 14.1 states that a business continuity management process should integrate IT with other factors such as operations, staffing, materials, transport, and facilities.

The associate vice president of financial operations stated that the business continuity plan for the campus was still in draft form due to the recent issuance of EO 1014.

Inadequate business continuity planning and testing increases the risk of ineffective preparedness and loss of essential services.

Recommendation 8

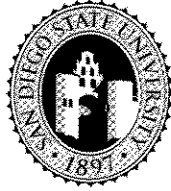
We recommend that the campus establish a business continuity plan for ES.

Campus Response

We concur. A business continuity plan for ES will be completed by March 30, 2009.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
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

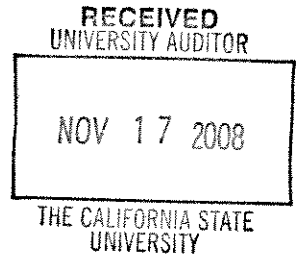


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Fax: 619 594-8894

THE PRESIDENT

November 12, 2008

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802



Dear Mr. Mandel:

Attached is San Diego State University's response to Audit Report 08-36, *Student Records and Registration*. Documentation of policy and control changes will follow under separate cover.

Should you have any questions or require additional information, please contact Valerie Carter, Audit and Tax Director, at 619-594-5901.

Sincerely,



Stephen L. Weber
President

SLW:rjl

Attachment

c: Sally F. Roush, Vice President for Business and Financial Affairs
Scott Burns, Associate Vice President, Financial Operations
Ethan Singer, Associate Vice President, Academic Affairs
Sandra Cook, Executive Director, Enrollment Services
Valerie J. Carter, Director, Audit and Tax

STUDENT RECORDS AND REGISTRATION

SAN DIEGO STATE UNIVERSITY

Audit Report 08-36

REGISTRATION

Recommendation 1

We recommend that the campus review changes in registration holds and registration priorities for questionable transactions during the registration windows when it would be advantageous for such changes to occur.

Campus Response

We concur. The University will establish a process to review changes in registration holds and priorities. The initial process review will be completed by January 30, 2009.

GRADING/RECORD ACCURACY AND INTEGRITY

LATE WITHDRAWALS

Recommendation 2

We recommend that the campus:

- a. Clearly establish the intention of the president on who is the academic administrator authorized to approve withdrawals in the last 20 percent of instruction.
- b. Require a signature by the president's designee when the withdrawal occurs in the last 20 percent of instruction.

Campus Response

We concur.

a & b. The University will identify an academic administrator, appointed by the President, who will approve withdrawal requests in the last 20 percent of instruction. The selection of an academic administrator and written approval process will be completed by February 27, 2009.

GRADE APPEALS

Recommendation 3

We recommend that the campus make annual reports of grade appeals to the faculty senate and president.

Campus Response

We concur. The University will report grade appeals cases annually. A process will be established by March 31, 2009.

SECURITY OF STUDENT RECORDS

INACTIVE ACCOUNTS

Recommendation 4

We recommend that the campus disable or suspend accounts that are inactive for extended periods.

Campus Response

We concur. The University will establish a process to disable or suspend inactive accounts by January 30, 2009.

SECURED SHREDDING

Recommendation 5

We recommend that the campus improve accountability when shredding documents with confidential student information.

Campus Response

We concur. The University has revised its process for shredding confidential documents.

TRANSCRIPT FEE RECONCILIATION

Recommendation 6

We recommend that the campus reconcile transcript fees to the total number of transcripts issued.

Campus Response

We concur. The University will begin reconciling transcript fee revenues. Spring 2008 will be used for the initial reconciliation and will be completed by March 31, 2009.

SERVER SECURITY

Recommendation 7

We recommend that the campus improve the physical security of computers hosting the Singularity application and store the backups at an off-site location.

Campus Response

We concur. Storage of backups to an off-site location has been implemented. The Singularity application and database servers will be relocated by January 30, 2009.

BUSINESS CONTINUITY

Recommendation 8

We recommend that the campus establish a business continuity plan for ES.

Campus Response

We concur. A business continuity plan for Enrollment Services will be completed by March 30, 2009.


THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

November 21, 2008

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

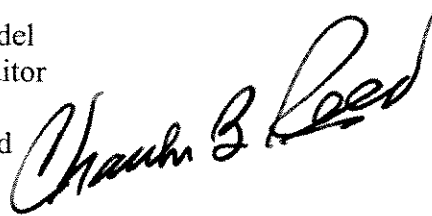
EAST BAY

FRESNO

TO: Mr. Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report 08-36 on *Student Records and Registration*,
San Diego State University

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of November 21, 2008, I accept the response as submitted with the draft final report on *Student Records and Registration*, San Diego State University.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/jt

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Mr. Scott Burns, Associate Vice President, Financial Operations
Ms. Sally F. Roush, Vice President, Business and Financial Affairs
Dr. Stephen L. Weber, President

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS