

**STUDENT RECORDS AND REGISTRATION**

**CALIFORNIA STATE UNIVERSITY,  
MONTEREY BAY**

**Audit Report 08-38  
December 17, 2008**

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Margaret Fortune    George G. Gowgani  
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## **ABBREVIATIONS**

CMS	Common Management Systems
CSU	California State University
CSUMB	California State University, Monterey Bay
EM	Enrollment Management
EO	Executive Order
FERPA	Family Educational Rights and Privacy Act of 1974 (As Amended)
I Grade	Incomplete
RD Grade	Report Delayed
SAM	State Administrative Manual
SIMS/R	Student Information Management System/Relational
SRR	Student Records and Registration
W Grade	Withdrawals

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## **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 California State University, Monterey Bay campus from June 30, 2008, through August 15, 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 August 15, 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]**

The campus had not established and published procedures for campus-originated challenge examinations nor certain important aspects of grade changes. The campus had not provided for the signature of an academic administrator designated by the president to approve withdrawals in the last 20 percent of instruction. In addition, grade appeal activity was not reported annually to the campus faculty senate and president, and the campus did not adequately document incomplete grades and timely convert incompletes to failing grades.

### **SECURITY OF STUDENT RECORDS [11]**

Campus procedures did not provide for the periodic review and reporting of information management practices concerning student records. Further, the campus had not reconciled transcript fee revenues to the number of official transcripts issued, and protection of vital student records required improvement.

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## 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 California State University, Monterey Bay, the university registrar is part of enrollment management (EM). The associate vice president of EM reports to the vice president of student 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.

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## **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 the assignment of priorities 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. Until recently, the most common type of registration hold at California State University, Monterey Bay (CSUMB) was for academic advising. Our review disclosed that approximately 33 staff had authority in PeopleSoft to place various types of holds and 155 staff (including 133 academic advisors) had authority to release holds. However, the campus did not regularly monitor and evaluate activity in establishing and releasing registration holds nor did the PeopleSoft program track these items.

#### Registration Priorities

Registration priorities are valuable commodities that assure individual students can get classes at the most desirable days/times and/or popular professors. Currently, disabled students, student-athletes, veterans, and student employees assisting with registration are the highest registration priorities at CSUMB. In fall 2008, 489 students from a population of 4,054 continuing students received registration priority.

Our review disclosed that approximately 11 staff had authorizations to change the registration dates and times; however, prior to the fall 2008 registration cycle under Banner, the program did 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 university registrar stated that the legacy system used for registration did not provide the automated capability to track changes in registration priorities and holds.

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 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 registration priorities by March 31, 2009.

## **GRADING/RECORD ACCURACY AND INTEGRITY**

### **CREDIT BY EXAMINATION**

The campus had not established and published procedures for campus-originated challenge examinations.

Executive Order (EO) 1036, *Systemwide Admission Eligibility and/or Baccalaureate Credit Awarded for External Examinations, Experiential Learning, and Instruction in Non-Collegiate Settings*, dated July 14, 2008, and its predecessor (EO 365, *Systemwide Credit by Evaluation*, dated November 1, 1981) require the campus to:

- ▶ Develop procedures for awarding credit for campus-originated challenge examinations that cover provisions such as the amount of credit a student can earn and how the credits can be applied.
- ▶ Include information about these examinations in the campus catalogs and web sites.

The associate vice president of academic planning and institutional effectiveness stated that procedures were weak because the campus had a history of alternative approaches and assessments.

Lack of well-publicized credit by examination procedures jeopardizes academic integrity and increases the risk of inconsistent interpretations in awarding credit.

### **Recommendation 2**

We recommend that the campus establish and publish appropriate procedures for campus-originated challenge examinations.

### **Campus Response**

We concur. The university will establish and publish procedures for campus-originated challenge examinations by August 1, 2009.

## **GRADE CHANGES**

The campus had not established procedures for certain important aspects of the grade change process.

Based on tests performed, there were two areas of concern regarding grade changes:

- ▶ The grade change process required an instructor or a designee to submit the grade change form in person to the office of records and registration and provide a form of photo identification. However, the campus did not annotate the form to document that the office of records and registration recipient had verified the instructor's identity.
- ▶ The campus did not notify an instructor of record when a grade was changed in the automated student records system.

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 university registrar stated that improvements in grade change controls were deferred during the implementation of the Common Management Systems.

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

### **Recommendation 3**

We recommend that the campus:

- a. Document the identity of instructors submitting grade change forms.
- b. Include a grade change confirmation process that would return the recorded grades to the originating instructor for verification.

### **Campus Response**

We concur.

- a. Documenting the identity of instructors submitting graded change forms was implemented on January 30, 2009.
- b. The university has included a grade change confirmation to the originating instructor for verification as of January 30, 2009.

## **LATE WITHDRAWALS**

The campus had not provided for the signature of an academic administrator designated by the president to approve withdrawals in the last 20 percent of instruction.

The campus processes for university withdrawal and withdrawal from individual courses after the add/drop period both required the same number of signatures regardless of when the transactions occurred. In chronological order, the instructor and a dean approve the forms; however, there were no additional signatures required in the last 20 percent of instruction for either form.

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 university registrar stated that the current process for university withdrawals already required a dean to sign as an academic administrator and the policy had been reviewed by the president in the context of *CSUMB Matriculation Policies 3.100 and 3.600*, dated September 1, 2002.

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 4**

We recommend that the campus:

- a. Clearly establish the intention of the president concerning 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 president has appointed the provost to approve withdrawals in the last 20 percent of instruction as of December 15, 2008.
- b. The signature of the provost is required on withdrawals that occur in the last 20 percent of instruction as of December 15, 2008.

## **GRADE APPEALS**

Grade appeal activity was not reported annually to the campus faculty senate and president.

CSUMB's *Grade Appeal Policy*, effective May 27, 2008, calls for formation of department review committees convened after informal resolution between a student and the instructor fails. The department chair is responsible for appointing committee members – three faculty (two from the grading department and one from outside the department) and one student. Prior policy entitled *Assessment Appeals*, effective September 1, 2002, required a written appeal to an appropriate committee of the campus faculty senate. There is no history in at least the last three years of any formal grade appeal activity at CSUMB.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 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 associate vice president of academic planning and institutional effectiveness stated that there had been no reporting of grade appeals because none had occurred and they were in the process of changing the system.

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

### **Recommendation 5**

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. The university established a process on January 23, 2009.

## **INCOMPLETES**

The campus did not adequately document incomplete grades and timely convert the incompletes to failing grades.

Specifically, we identified contracts for incomplete grades that were not signed by the student or were missing due date extensions, and some contracts that were missing or never prepared.

Additionally, incomplete grades were not timely converted to failing grades. Outstanding incompletes were noted as follows including some from extended education:

Period	Number
1999/00	639
2000/01	493
2001/02	528
2002/03	35
2003/04	11
2004/05	26
2005/06	13
2006/07	16
TOTAL	1,761

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states:

- ▶ 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 provided; however, an extension of the one-year time limit may be granted by petition for contingencies.
- ▶ If the incomplete is not converted within the prescribed time limit, or any extension thereof, it shall be counted as a failing grade in calculating grade point averages and progress points.

The university registrar stated that the campus operated for a number of years without an enforceable incomplete grade policy and it subsequently decided to grandfather some older incompletes and continue to freeze incompletes in perpetuity once students had graduated to avoid retroactive changes.

Existence of incompletes without adequate documentation exposes the campus to misunderstandings on the validity of the grading process, while failure to timely convert incompletes results in a permanent error in the calculation of grade point averages and could expose the campus to the risk of graduating ineligible students.

### **Recommendation 6**

We recommend that the campus:

- a. Develop a system to ensure appropriate documentation of incomplete grades.
- b. Require resolution of any outstanding work such as courses with incompletes before graduation.

### **Campus Response**

We concur.

- a. The university will ensure appropriate documentation of incomplete grades by August 1, 2009.
- b. Resolution of any outstanding work with incompletes to be complete by August 1, 2009.

## **SECURITY OF STUDENT RECORDS**

### **STUDENT INFORMATION MANAGEMENT**

Campus procedures did not provide for the periodic review and reporting of information management practices concerning student records.

EO 796, *Privacy and Personal Information Management Student Record Administration*, dated January 1, 2002, states that each campus shall adopt a written policy statement establishing procedures by which the campus intends to comply with the federal Family Educational Rights and Privacy Act of 1974 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.

The university registrar stated that completion of the EO 796 review was an oversight due to turnover in administrative positions and PeopleSoft implementation priorities.

Failure to periodically review information management practices increases the risk of regulatory violations and liability lawsuits and may result in negative publicity in the event of a privacy complaint.

### **Recommendation 7**

We recommend that the campus establish procedures to periodically review information management practices concerning student records and report the results to the chancellor.

### **Campus Response**

We concur. The university will establish procedures to periodically review information management practices concerning student records and report results to the chancellor by May 1, 2009.

## 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	One	\$5
	2 – 10 (prepared at the same time)	\$2 each
	11 or more (prepared at the same time)	\$1 each
2 Day Rush	Any Number	\$20 each

During the period of July 2007 to March 2008, the cashier collected \$25,055 in transcript fee revenue and the registrar printed 7,384 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 university registrar stated that she already gets periodic feedback on official transcript fee revenues and further reconciliation was secondary to the activities in the PeopleSoft implementation.

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 8

We recommend that the campus reconcile transcript fee revenue to the total number of official transcripts issued.

**Campus Response**

We concur. The university will begin reconciling transcript fee revenues with the spring 2009 term.

**VITAL RECORDS PROTECTION**

Protection of vital student records required improvement.

The campus had only the originals of many vital student records. These records were stored in a central location that was partially secured; however, there were no fireproof filing cabinets.

The security standards of the American Association of Collegiate Registrars and Admissions Officers state that permanent records kept in paper form should be stored in fireproof cabinets or vaults and should have a backup on another medium for security.

The university registrar stated that additional security for student records was deferred as part of the campus document imaging project.

Failure to take adequate protective measures exposes the campus to the risk of loss of irreplaceable vital student records.

**Recommendation 9**

We recommend that the campus implement controls to adequately protect vital student records.

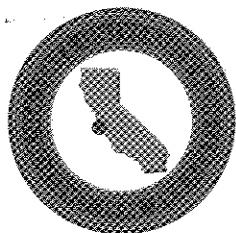
**Campus Response**

We concur. The university will implement controls to adequately protect student records by February 27, 2009.

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## **APPENDIX A: PERSONNEL CONTACTED**

<u>Name</u>	<u>Title</u>
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  
**Monterey Bay**

OFFICE OF THE VICE PRESIDENT  
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February 5, 2009

RECEIVED  
UNIVERSITY AUDITOR

FEB 5 2009

THE CALIFORNIA STATE  
UNIVERSITY

Mr. Larry Mandel  
University Auditor  
Office of the University Auditor  
California State University  
401 Golden Shore, 4<sup>th</sup> Floor  
Long Beach, CA 90802

Subject: Student Records and Registration Audit #08-38

Dear Larry:

Attached is the hard copy of CSU Monterey Bay's responses to the recommendations regarding the subject audit. Electronic copy has already been transmitted to your attention.

Please contact AVP John Fitzgibbon if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "James E. Main".

James E. Main  
VP for Administration and Finance

Attachment

cc: Senior Director Schlack  
Interim VP Higgs  
Registrar Hernandez  
Associate VP Fitzgibbon

## STUDENT RECORDS AND REGISTRATION

### CALIFORNIA STATE UNIVERSITY, MONTEREY BAY

#### Audit Report 08-38

## 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 registration priorities by March 31, 2009.

## GRADING/RECORD ACCURACY AND INTEGRITY

### CREDIT BY EXAMINATION

### Recommendation 2

We recommend that the campus establish and publish appropriate procedures for campus-originated challenge examinations.

### Campus Response

We concur. The university will establish and publish procedures for campus-originated challenge examinations by August 1, 2009.

### GRADE CHANGES

### Recommendation 3

We recommend that the campus:

- a. Document the identity of instructors submitting grade change forms.
- b. Include a grade change confirmation process that would return the recorded grades to the originating instructor for verification.

### **Campus Response**

We concur.

- a. Documenting the identity of instructors submitting graded change forms implemented on January 30, 2009.
- b. The university has included a grade change confirmation to the originating instructor for verification as of January 30, 2009.

### **LATE WITHDRAWALS**

#### **Recommendation 4**

We recommend that the campus:

- a. Clearly establish the intention of the president concerning 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 president has appointed the provost to approve withdrawals in the last 20 percent of instruction as of December 15, 2008.
- b. The signature of the provost is required on withdrawals that occur in the last 20 percent of instruction as of December 15, 2008.

### **GRADE APPEALS**

#### **Recommendation 5**

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. The university established a process on January 23, 2009.

## **INCOMPLETES**

### **Recommendation 6**

We recommend that the campus:

- a. Develop a system to ensure appropriate documentation of incomplete grades.
- b. Require resolution of any outstanding work such as courses with incompletes before graduation.

### **Campus Response**

We concur.

- a. The university will ensure appropriate documentation of incomplete grades by August 1, 2009.
- b. Resolution of any outstanding work with incompletes to be complete by August 1, 2009.

## **SECURITY OF STUDENT RECORDS**

### **STUDENT INFORMATION MANAGEMENT**

#### **Recommendation 7**

We recommend that the campus establish procedures to periodically review information management practices concerning student records and report the results to the chancellor.

#### **Campus Response**

We concur. The university will establish procedures to periodically review information management practices concerning student records and report results to the chancellor by May 1, 2009.

### **TRANSCRIPT FEE RECONCILIATION**

#### **Recommendation 8**

We recommend that the campus reconcile transcript fee revenue to the total number of official transcripts issued.

#### **Campus Response**

We concur. The university will begin reconciling transcript fee revenues with the spring 2009 term.

## **VITAL RECORDS PROTECTION**

### **Recommendation 9**

We recommend that the campus implement controls to adequately protect vital student records.

### **Campus Response**

We concur. The university will implement controls to adequately protect student records by February 27, 2009.



THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

BAKERSFIELD

February 12, 2009

CHANNEL ISLANDS

CHICO

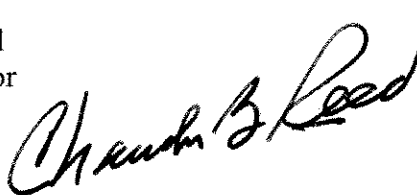
**MEMORANDUM**

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel  
University Auditor

FRESNO

FROM: Charles B. Reed  
Chancellor


FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 08-38 on *Student Records and Registration*,  
California State University, Monterey Bay

LONG BEACH

LOS ANGELES

In response to your memorandum of February 12, 2009, I accept the response as submitted with the draft final report on *Student Records and Registration*, California State University, Monterey Bay.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/jt

POMONA

Enclosure

SACRAMENTO

cc: Mr. John Fitzgibbon, Associate Vice President, Finance  
Dr. Dianne F. Harrison, President  
Mr. James Main, Vice President, Administration and Finance

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS