STUDENT RECORDS AND REGISTRATION
CALIFORNIA STATE UNIVERSITY,
FRESNO

Audit Report 08-42
February 13, 2009

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ABBREVIATIONS

ARE Admissions, Records, and Evaluations
CMS Common Management Systems
CSU California State University
EO Executive Order
FERPA Family Educational Rights and Privacy Act of 1974 (As Amended)
I Grade Incompletes
RD Grade Report Delayed
SAM State Administrative Manual
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 the California State University, Fresno campus from September 15, 2008, through October 17, 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 October 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 satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

GRADING/RECORD ACCURACY AND INTEGRITY [5]

The campus did not timely replace the administrative grading symbol RD (Report Delayed) with a substantive grade and did not document RD notifications. Additionally, the campus did not adequately document and approve withdrawals after census date or in the last 20 percent of instruction.

SECURITY OF STUDENT RECORDS [7]

Campus procedures did not ensure the periodic review and reporting of information management practices concerning student records. The campus did not ensure that a reconciliation of transcript fees received to the number of transcripts issued was prepared, reviewed, and approved. In addition, campus storage and security of vital student records was not adequate, and the campus did not maintain accountability over the shredding of documents with confidential student information by a private contractor.
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.

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 CSU Fresno, the registrar is part of admissions, records, and evaluations (ARE). The ARE director reports through the associate vice president of enrollment services 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.
INTRODUCTION

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 January 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

GRADING/RECORD ACCURACY AND INTEGRITY

REPORT DELAYED GRADING SYMBOL

The campus did not timely replace the administrative grading symbol RD (Report Delayed) with a substantive grade and did not document RD notifications.

We reviewed 233 RD grades as of the date of our review and noted that:

- One hundred forty seven RD grades pertained to the current academic year and were assigned in fall 2007 (88) and spring 2008 (59). However, the remaining 86 RD grades had not been timely replaced with a substantive grade and pertained to prior academic years: fall 2005 (16), spring 2006 (14), fall 2006 (40), and spring 2007 (16).

- There was no evidence of notification of the instructor of record and the department chair within one week of the assignment of the RD grade by the registrar.

Executive Order (EO) 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states 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. The registrar shall notify both the instructor of record and the department chair within one week of the assignment of RD grades.

The registrar stated that this was an oversight because the faculty had submitted all grades at the end of each term. She added that the campus had not put a system in place to periodically review outstanding RD grades for disposition or inform instructors and chairs of assignment of RD grades.

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

**Recommendation 1**

We recommend that the campus strengthen procedures to ensure that RD grades are timely replaced with a substantive grade and instructors and department chairs are notified within one week of RD assignment.

**Campus Response**

We concur. The registrar has developed with campus information systems, a process to notify faculty and department chairs by email communication regarding the outstanding RD grade. This process can be run on demand by the registrar at the end of every grading cycle and periodically throughout the year. A communication will be sent to the instructor of record and the department chair reminding the instructor to submit a final grade in a timely manner. This new process will be used with the spring 2009 grading cycle when grades are reported in June.
WITHDRAWALS

The campus did not adequately document and approve withdrawals after census date or in the last 20 percent of instruction.

Our review of 22 spring 2008 withdrawals after census date but before final 20 percent of instruction (between February 12, 2008, and April 15, 2008) disclosed that:

- In 8 of 22 instances, the department administrative staff stamped requests indicating approval in lieu of an approval signature by the chair and/or the dean as required.

- Student explanations for withdrawal did not always represent a serious and compelling reason. Campus practice lacked consistency in applying this prerequisite and departments were inconsistent in requirements for documentation.

- Thirteen of 22 withdrawals did not include documented evidence of the serious and compelling reasons.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states, in part, that 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.

Our review of 34 spring 2008 withdrawals during the final 20 percent of instruction (between April 16, 2008, and May 7, 2008) disclosed that:

- Requests for withdrawal during the final 20 percent of instruction were not appropriately approved by the instructor. In some instances, requests were not approved by the department chair and/or dean.

- None of the 34 withdrawals during the final 20 percent of instruction reviewed was signed by the instructor, and in 14 instances, withdrawals reviewed did not include approval by the chair and/or dean. None of the requests for withdrawal was reviewed or approved by the academic administrator appointed by the president.

- Student explanations for withdrawal did not always represent an accident or serious illness, where the cause of withdrawal was due to circumstances clearly beyond the student’s control. Campus practice was unclear in its application of this prerequisite and requirements for documented evidence.

- In 20 instances, there was no documented evidence of an accident or serious illness, where the cause of withdrawal was due to circumstances clearly beyond the student’s control.
EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states, in part, that 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 associate vice president/dean of undergraduate studies stated that campus departments had not reached a consensus on the requirements for approval of, or the definition of, serious and compelling. He further stated that the complete withdrawal forms did not include instructions to obtain approval of the academic administrator because the campus was under the impression that the school deans were the president’s designee.

Lack of adequate documentation and approval of withdrawals adversely affect the accuracy and integrity of student records.

**Recommendation 2**

We recommend that the campus improve the documentation for withdrawals after census date or in the last 20 percent of instruction to include both an adequate justification of compelling reasons and the required approvals, including that of the academic administrator so designated by the campus president.

**Campus Response**

We concur. This item has been completed. After consultation with the provost, the registrar has redesigned the Drop/Withdrawal Form, and it now includes instructions for required documentation for all serious and compelling reasons related to withdrawals and also for withdrawals within the last 20 percent period of instruction. The redesign of the form also includes an approval signature from the academic administrator designated by the president. We are using this new form effective with the spring 2009 semester.

**SECURITY OF STUDENT RECORDS**

**STUDENT INFORMATION MANAGEMENT**

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

The campus conducted a meeting of the committee for biennial review of records management in August 2008. However, the campus did not ensure adequate documentation of periodic review and biennial reporting of information management practices concerning student records.
We noted that:

- A campus written policy statement establishing procedures by which the campus intends to comply with the Family Educational Rights and Privacy Act (FERPA) did not include a requirement to periodically review campus information management practices at least every two years.

- Campus reviews were not adequately documented.

- The results of documented campus reviews were not forwarded to the chancellor by the president.

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 FERPA 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 admissions, records, and evaluations (ARE) director stated that the campus had conducted biennial meetings; however, due to conflicting priorities of the committee, the results of the reviews were not documented and forwarded to the chancellor’s office.

The absence of biennial reviews increases the risk of inappropriate distribution of student records.

**Recommendation 3**

We recommend that the campus resume documented biennial reviews of information management practices concerning student records and report results to the chancellor.

**Campus Response**

We concur. The campus conducted its latest biennial review of records management in August 2008, one month prior to the auditor’s site visit. The report is being finalized to include changes to campus administrative policy manuals, and a copy of the report will be submitted by May 29, 2009, to the chancellor’s office. Additionally, the next biennial review to be conducted in 2010 has been scheduled in advance.

**TRANSCRIPT FEE RECONCILIATION**

The campus did not ensure that a reconciliation of transcript fees received to the number of transcripts issued was prepared, reviewed, and approved.
State Administrative Manual (SAM) §20050 states in part that the elements of a satisfactory system of accounting and administrative control shall include, in part, recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures, and an effective system of internal review.

Government Code §13402 and §13403 requires 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 registrar stated that transcript reconciliations could not be prepared because the campus had not created a process to forward the necessary information from student services and the cashiers to the appropriate accounting staff.

Failure to reconcile transcript fees in a timely and complete manner increases the risk that errors and irregularities will not be detected and could result in misappropriation of transcript fee revenue.

**Recommendation 4**

We recommend that the campus periodically perform reconciliations of transcript fees to the number of transcripts issued and ensure that reconciliations are timely reviewed, signed, and dated.

**Campus Response**

We concur. The university has planned a new procedure for routine reconciliation of transcript revenue and transcripts produced. A new item code was established in the accounting office to isolate transcript revenue. Additionally, the accounting and registrar’s office have established a quarterly schedule for reconciliation of transcript payments with data produced by transcript audit reports. These reconciliation reports will be prepared, reviewed, signed, and dated by the accounting officer and registrar, with the first one being performed for the quarter ending June 30, 2009.

**VITAL RECORDS PROTECTION**

Campus storage and security of vital student records was not adequate.

Student records were stored in a partially protected area that was not in a locked or secured space. In addition, backup copies of student records were not produced and stored on another medium, and the student records were not stored in fireproof filing cabinets.

The security standards of the American Association of Collegiate Registrars and Admissions Officers states that permanent records kept in paper form should be stored in fireproof file cabinets or vaults and should have a backup on another medium for security. Confidential records should be stored in either a file room or file cabinet that can be locked.
The ARE director stated that plans to upgrade storage and security had suffered because of a lack of resources and space available to ARE.

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

**Recommendation 5**

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

**Campus Response**

We concur. The university is installing this week an electronic “locknetics” system to restrict access to the ARE where student records are stored. This locknetics system requires a keycard or PIN access. Only employees of ARE have been authorized access to this secure area.

Additionally, to ensure long-term security of hard-copy student records, the university has resumed its archive project to convert hard-copy records into electronic format compatible with the Hershey’s Singularity software used to image all new records. Internal resources will be used to resume the archive project. This is a very large project involving an estimated 142,000 student folders, with multiple pages in each folder. We have set a goal of having the project underway this summer with about 27 percent of the initial records being scanned during fiscal year 2009/2010.

**DOCUMENT DESTRUCTION**

The campus did not maintain accountability over the shredding of documents with confidential student information by a private contractor.

Our review disclosed that the campus had no assurance that containers of documents with confidential student information were appropriately shredded and disposed of by a private contractor.

FERPA establishes a duty and obligation to protect disclosure of personally identifiable student information such as what was contained in documents designated for shredding by ARE.

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 ARE was unaware of the SAM requirement to have an employee present during shredding of confidential documents.

Inadequate accountability over the shredding of documents with confidential student information increases the risk of disclosure of personally identifiable student information.
Recommendation 6

We recommend that the campus implement controls to maintain accountability over the shredding of documents with confidential student information by a private contractor.

Campus Response

We concur. This item has been completed. The university modified its contract with the external vendor to include shredding “on-site.” At each scheduled “pick-up,” American Mobile Shredding, Inc., contacts our designated employee. This employee accompanies the vendor to the truck and witnesses the shredding of confidential documents. The truck is equipped with a camera that is mounted to view documents that are being shredded. A “Certificate of Destruction” is provided to us after each scheduled pick-up.
## APPENDIX A:
PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>John D. 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>
</tr>
<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>
</tr>
<tr>
<td>Dennis Nef</td>
<td>Associate Vice President/Dean of Undergraduate Studies</td>
</tr>
<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>
MEMORANDUM

April 10, 2009

TO: Larry Mandel
    University Auditor

FROM: Dr. John Welty
      President

SUBJECT: Responses to the Audit of Student Records, Report #08-42

Please find attached our set of campus responses to your audit report on the subject of student records.

cc: Dr. Paul Oliaro
    Mr. Matt Babick
    Ms. Cynthia Matson
California State University, Fresno
RESPONSE TO TRUSTEE AUDIT REPORT
STUDENT RECORDS AND REGISTRATION
AUDIT REPORT, 08-42

GRADING/RECORD ACCURACY AND INTEGRITY

REPORT DELAYED GRADING SYMBOL

Recommendation 1

We recommend that the campus strengthen procedures to ensure that RD grades are timely replaced with a substantive grade and instructors and department chairs are notified within one week of RD assignment.

Campus Response

We concur. The Registrar has developed with Campus Information Systems, a process to notify faculty and department chairs by email communication regarding the outstanding Report Delayed (RD) grade. This process can be run on demand by the Registrar at the end of every grading cycle and periodically throughout the year. A communication will be sent to the instructor of record and the department chair reminding the instructor to submit a final grade in a timely manner. This new process will be used with the spring 2009 grading cycle when grades are reported in June.

WITHDRAWALS

Recommendation 2

We recommend that the campus improve the documentation for withdrawals after census date or in the last 20 percent of instruction to include both an adequate justification of compelling reasons and the required approvals, including that of the academic administrator so designated by the campus president.

Campus Response

We concur. This item has been completed. After consultation with the Provost, the Registrar has redesigned the Drop/Withdrawal Form and it now includes instructions for required documentation for all serious and compelling drops/withdrawals and also for withdrawals within the last 20 percent period of instruction. The redesign of the form also includes an approval signature from the academic administrator designated by the President. We are using this new form effective with the spring 2009 semester.
SECURITY OF STUDENT RECORDS

STUDENT INFORMATION MANAGEMENT

Recommendation 3

We recommend that the campus resume documented biennial reviews of information management practices concerning student records and report results to the chancellor.

Campus Response

We concur. The campus conducted its latest Biennial Review of Records Management in August 2008, one month prior to the auditor’s site visit. The report is being finalized to include changes to campus administrative policy manuals and a copy of the report will be submitted by May 29, 2009 to the Chancellor’s Office. Additionally, the next Biennial Review to be conducted in 2010 has been scheduled in advance.

TRANSCRIPT FEE RECONCILIATION

Recommendation 4

We recommend that the campus periodically perform reconciliation of transcript fees to the number of transcripts issued and ensure that reconciliations are timely reviewed, signed, and dated.

Campus Response

We concur. The university has planned a new procedure for routine reconciliation of transcript revenue and transcripts produced. A new item code was established in the Accounting Office to isolate transcript revenue. Additionally, the Accounting and Registrar’s Office have established a quarterly schedule for reconciliation of transcript payments with data produced by transcript audit reports. These reconciliation reports will be prepared, reviewed, signed, and dated by the Accounting Officer and Registrar, with the first one being performed for the quarter ending June 30, 2009.

VITAL RECORDS PROTECTION

Recommendation 5

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Campus Response

We concur. The university is installing this week an electronic “locknetics” system to restrict access to the Admissions, Records, and Evaluations Office (ARE) where student records are stored. This locknetics system requires a keycard or PIN access. Only employees of Admissions, Records, and Evaluations staff have been authorized access to this secure area.

Additionally, to ensure long-term security of hardcopy student records, the university has resumed its Archive Project to convert hard copy records into electronic format compatible with the Hershey’s Singularity software used to image all new records. Internal resources will be used to resume the
Archive Project. This is a very large project involving an estimated 142,000 student folders, with multiple pages in each folder. We have set a goal of having the project underway this Summer with about 27% of the initial records being scanned during fiscal year 2009/10.

DOCUMENT DESTRUCTION

Recommendation 6

We recommend that the campus implement controls to maintain accountability over the shredding of documents with confidential student information by a private contractor.

Campus Response

We concur. This item has been completed. The university modified its contract with the external vendor, to include shredding “on-site”. At each scheduled “pick-up”, American Mobile Shredding, Inc., contacts our designated employee. This employee accompanies the vendor to the truck and witnesses the shredding of confidential documents. The truck is equipped with a camera that is mounted to view documents that are being shredded. A “Certificate of Destruction” is provided to us after each scheduled pick-up.
May 8, 2009

MEMORANDUM

TO: Mr. Larry Mandel  
   University Auditor

FROM: Charles B. Reed  
   Chancellor

SUBJECT: Draft Final Report 08-42 on Student Records and Registration,  
   California State University, Fresno

In response to your memorandum of May 8, 2009, I accept the response as submitted with the draft final report on Student Records and Registration, California State University, Fresno.

CBR/amd

Enclosure

c: Mr. Matt Babick, Internal Auditor  
   Dr. John D. Welty, President