

STUDENT RECORDS & REGISTRATION

**CALIFORNIA STATE UNIVERSITY
CHICO**

**Report Number 99-24
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Members, Committee on Audit

Stanley T. Wang, Chair
Harold Goldwhite, Vice Chair
Dee Dee Myers Joan Otomo-Corgel
Frederick W. Pierce, IV
Ali Razi

Staff

University Auditor: Larry Mandel
Senior Director: Norm Buettner
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ABBREVIATIONS

AACRAO	American Association of Collegiate Registrars and Admissions Officers
CSU	California State University
EM	Executive Memorandum
EMS	Enrollment Management Services
EO	Executive Order
FERPA	Family Education Rights and Privacy Act
OUA	Office of the University Auditor
SCT	Systems & Computer Technology Corporation
SIMS/R	Student Information Management System/Relational
SIS+	Student Information System Plus
TRACS	Telephone Registration at Chico State

INTRODUCTION

PURPOSE

The primary purposes of this audit are to furnish an independent appraisal of the student records and registration functions; ascertain compliance with established policies and procedures; determine adequacy of internal controls; and identify opportunities for operational improvements which would promote achievement of goals and objectives.

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

- ▶ systemwide requirements in executive orders 268 and 320 have been implemented;
- ▶ only authorized grades/grade changes are posted to students' records;
- ▶ there are reasonable access and disclosure provisions for protected student records including safeguards preventing the release of personal and confidential information unless the written consent of the student has been received;
- ▶ students can examine the contents of their educational records and request amendments;
- ▶ campuses respond to requests for records within a reasonable period of time;
- ▶ transcripts are controlled;
- ▶ there is a reasonable records management program;
- ▶ there is equity in registration priorities;
- ▶ touch tone and voice response technologies are appropriately used; and
- ▶ add/drop procedures are consistently followed.

SCOPE AND METHODOLOGY

The scope of the student records audit as presented in Attachment B, Agenda Item 2 of the January 1999 meeting of the Committee on Audit included database integrity, security and confidentiality, and the enrollment process.

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

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

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

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

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

BACKGROUND

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

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

The Banner and Student Information System Plus (SIS+) systems are products of Systems & Computer Technology (SCT) Corporation. The Student Information Management System/Relational (SIMS/R) database is a CSU developed system in an Oracle client/server environment. The student administration module of PeopleSoft will eventually replace these three systems. The current PeopleSoft implementation

schedule has not been finalized. One recent plan has two different alternatives that carry forward the concept of campus groups or waves that will phase in over a period of time that may not start until late 1999 and not conclude until early 2006.

The Office of the University Auditor (OUA) completed an audit of student records in 1990 at the following seven campuses, and summarized these audits in a systemwide report numbered 90-01:

CAMPUS	REPORT#
Chico	90-02
Humboldt	90-09
Pomona	90-08
Sacramento	90-05
San Francisco	90-06
San Luis Obispo	90-04
Sonoma	90-03

The student records and registration function at the Chico campus is the responsibility of enrollment management services (EMS). EMS is supervised by a director, student records and registration, who reports to the vice provost for enrollment management.

The automated system for student recordkeeping at Chico is the Student Information System Plus (SIS+) from SCT Corporation. This system runs on an IBM mainframe computer. Beginning in Fall 1993, student records data was entered in SIS+. Prior to Fall 1993, student records were maintained on a permanent record cards.

Registration at the Chico campus is predominantly accomplished by students through a telephone-based system – Telephone Registration at Chico State (TRACS). TRACS is augmented to the extent necessary through a manual change of program process.

OPINION

We visited the campus from March 14 to April 30, 1999, and audited the policies and procedures in effect at that time.

During the course of the audit, we:

- ▶ interviewed management and operating personnel;
- ▶ inspected facilities used to store student records;
- ▶ reviewed various documents, policies, and procedures; and

- ▶ tested selected controls and systems integral to student records and registration.

We found that the campus had a reasonable student records program and registration process. Within the centralized student records area, there were adequate provisions for records management. However, as described further in the report, we have reservations about the level of protection provided to student information by campus departments outside the records office. There are some limitations as to what can be done with the current automated database as well as features that could be further utilized for enhanced security.

Areas that warrant the attention of management are mentioned in the executive summary.

EXECUTIVE SUMMARY

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

STUDENT RECORD POLICY ADMINISTRATION [6]

POLICY UPDATING [6]

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

BIENNIAL REVIEWS [6]

The campus has not been conducting biennial reviews of information management practice concerning student records. Biennial reviews would help assure that information practices concerning student records are appropriate.

GRADES [7]

WITHDRAWAL "W" DOCUMENTATION [7]

Documentation regarding reasons for withdrawal after census date was inadequate. Capturing "W" documentation would complete the student record.

GRADE/GRADE CHANGE CONTROLS [8]

Overall grade/grade change controls were weakened by lapses in particular types of transactions and/or departments. Enforcing these controls would strengthen the campus system and provide an additional measure of protection against possible student record inaccuracies.

DATA CONTROL, SECURITY & INTEGRITY [10]

UNUSED FEATURES [10]

Several SIS+ security features were not utilized. Implementation of these features would improve security of student records. Using all available SIS+ security features reduces the risk of security breaches.

UNKNOWN RECORD LOCATIONS/DISPOSITIONS [11]

The campus is unaware of all ancillary student record locations and disposition of distributed data. Tracking extracts from SIS+ and monitoring the disposition of these protected student records reduces exposure to unauthorized access and disclosure and potential FERPA violations.

REGISTRATION [12]

UNAUTHORIZED GRADING SYMBOL [12]

In lieu of disenrolling students for non-payment of fees, the campus utilizes an unauthorized dollar sign as an administrative grading symbol. Chancellor's office approval of non-standard grading symbols is warranted to maintain a common systemwide grading methodology.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORD POLICY ADMINISTRATION

POLICY UPDATING

The campus student records policy was outdated.

Campus Executive Memorandum (EM) 78-16, *Privacy and Personal Information Management, Student Records Administration*, dated November 2, 1978, has not been updated since initial implementation. The *Family Educational Rights and Privacy Act (FERPA) of 1974 As Amended*, changed in 1990, 1992, 1994, 1995, and 1996. A specific example was the 1990 *Crime Awareness and Campus Security Act* that modified FERPA disclosure rules.

Executive Order (EO) 382, *Privacy and Personal Information Management, Student Records Administration*, with an effective date of March 10, 1982, required each campus to adopt a written policy statement establishing the various procedures by which the campus intends to comply with the federal Family Education Rights and Privacy Act (FERPA). EO 382 superseded EO 267, dated April 19, 1977.

The director, student records and registration, indicated that EM 78-16 had not been updated because the campus has never been prompted to do so.

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

Recommendation 1

We recommend that the campus strengthen procedures to ensure that EM 78-16 is appropriately updated and currently maintained.

Campus Response

Campus will review EM 78-16 and update procedures to include changes in campus organization and policies, FERPA, etc. The Vice Provost for Enrollment Management Services has already directed the University Registrar to begin this process. Completion Date March 30, 2000

BIENNIAL REVIEWS

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

Section D of Executive Order 382 requires the campus to establish procedures for reviewing the campus information management practice concerning student records. It further states that:

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

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

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

The director, student records and registration, indicated that the reviews probably ceased when the results were no longer required to be sent to the Chancellor's Office.

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

Recommendation 2

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

Campus Response

As recommended, under the direction of the Vice Provost for Enrollment Management Services California State University Chico will conduct the biennial review of information principles as specified in EO 382. The campus will develop criteria for a review of practice and policy, including an analysis of the "appropriateness of campus policy statement on the privacy of student records", that is, the review of EM 78-16 required in Recommendation #1. Completion Date March 30, 2000

GRADES

WITHDRAWAL "W" DOCUMENTATION

Documentation regarding reasons for withdrawal after census date was inadequate.

Nineteen percent (33 of 174) of the reported Fall 1998 withdrawals did not include a reason on the official withdrawal forms. In addition, the accuracy of the Fall 98 printout was questionable. We noted an additional nine Fall 1998 withdrawals that had not been included on the printout.

Executive Order 268 has progressively more difficult standards for acceptable use of the “W” (Withdrawal) grading symbol based on the timing of the action in relation to completion of the term as follows:

Withdrawals after census date and prior to the last three weeks of the instruction are permissible only for serious and compelling reasons. The requests and approvals shall state the reasons for the withdrawal.

Withdrawals shall not be permitted during the final three weeks 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.... Ordinarily, withdrawals of this sort will involve total withdrawal from the campus.... Requests for permission to withdraw under these circumstances shall be handled and filed as indicated in the preceding paragraph, except that such requests must also be endorsed by the Academic Administrator appointed by the President to act in such matters.

The director, student records and registration, indicated that there was an implicit understanding that the reason was adequate if the request was properly authorized in accordance with campus policy.

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

Recommendation 3

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

Campus Response

The Vice Provost for Enrollment Management Services has directed revision of the procedures for Complete Withdrawal from the University and the procedures by which Change of Program (add/drop) forms are processed.

As part of the process of improving documentation of reasons for withdrawal required by this audit, the Vice Provost for Enrollment Management Services has directed the Registrar not to accept Change of Program "drop" or "withdrawal" forms (used for adding and dropping courses at CSU Chico) and, rather, return them to the Deans or Departments which authorized them for addition of a written statement of the reason for the authorization. Completion Date March 30, 2000

GRADE/GRADE CHANGE CONTROLS

Overall grade/grade change controls were weakened by lapses in particular types of transactions and/or departments.

Exceptions to the various campus requirements were noted as follows:

- ▶ Handwritten grade rolls have some margin of error when faculty write in one grade and bubble in a different grade that is read by machine and posted through automated means to the student record. This occurred on three of twenty grade sheets reviewed. In editing the grade rolls, more attention is paid to the machine readable portions so the forms will not fail batch processing and necessitate manual intervention.
- ▶ Change-of-grade turnaround documents were intercepted in the department office by the secretary prior to confirmation by instructors (observed in only one academic department – Construction Management). The faculty in this department took a vote and authorized this practice.
- ▶ A signature stamp was used for administrative approval by one department (observed only in the History department) because the current chair had delegated this permission.
- ▶ Within the student records and registration office, minor discrepancies existed between related party disclosures and restricted file access by those with SIS+ authorization to change grades due to conversion between database platforms.

The campus system of preventative and detective controls on the accuracy of grades is derived from different sources such as:

- ▶ The transmittal letter for grade rolls each term;
- ▶ The change of grade procedures printed on the front of the change of grade card; and
- ▶ The official campus grading policy in Executive Memorandum 92-13.

Although there were mitigating controls to overcome these lapses, the effectiveness of the overall campus system is weakened when individual controls are not enforced. Further breakdowns would result in unacceptable risk exposures and potential inaccuracies in student records.

Recommendation 4

We recommend that the campus enforce controls regarding discrepancies on grade rolls, distribution of change-of-grade confirmations, use of signature stamps, and restricted file access.

Campus Response

Two years ago, the Student Records and Registration Office modified the existing change-of-grade form from a single-part to a multi-part format in order to provide instructors with a receipt for any

action which was received and processed by SRO. This receipt is sent back to each instructor approving a change of grade action in order to provide the instructor with the opportunity to verify the original approval. Additionally, the Vice Provost for Enrollment Management Services has already directed the Registrar to return a Change of Grade form with a stamped approval to the Dean of the College in which the instructor's class was offered. Further, we will seek formal inclusion of these procedures in the University grade change policy (University Grading Policy, latest version: EM92-13).

In concert with the changes described in the campus response to Recommendation 3, the Change of Grade form has been modified to include a required written reason for the approval of the action, and the Vice Provost for Enrollment Management has directed the Registrar not to accept or process approved Change of Grade forms without a written reason included. Forms without a written reason will be returned to the Dean of the College who had approved the action for further processing. The campus Grading Policy will be reviewed for inclusion of these procedures. Finally, the College AOA's and Department Secretaries will be reminded of grade change signature and FERPA-based record confidentiality requirements annually in writing and by presentations by the University Registrar. Completion Date March 30, 2000

DATA CONTROL, SECURITY & INTEGRITY

UNUSED FEATURES

Several SIS+ security features were not utilized.

The unused SIS+ security features included such issues as:

- ▶ whether users can or must change their passwords;
- ▶ whether passwords expire and, if so, how often;
- ▶ whether passwords are case sensitive and how many characters are required; and
- ▶ whether the system automatically inactivates an account after an extended period of non use.

The current campus process for gaining access to the student records maintained in SIS+ is twofold. First, the potential user must receive an IBM account. Secondly, the user receives a SIS+ operator identification number. The campus uses common practices for getting new users up and operating on the system.

According to several administrators, they are unaware as to why certain security features were not turned on when SIS+ was first implemented.

The present level of security does not take full advantage of SIS+ features expose the campus to security breaches that these features are designed to address.

Recommendation 5

We recommend that the campus enable the additional security features available in SIS+.

Campus Response

The University agrees that additional security features available in SIS+ should be implemented and has already activated the following system security features:

- 1) Periodic system-generated termination of a user system access password which forces the user to change the password before accessing the system again.
- 2) Identification through reports of inactive accounts and the subsequent termination of those accounts.
- 3) Activation and maintenance of system logs for grade change actions.

Completion Date March 30, 2000

UNKNOWN RECORD LOCATIONS/DISPOSITIONS

The campus is unaware of all ancillary student record locations and disposition of distributed data.

The central automated database for student records (SIS+) maintained on the IBM mainframe is used in various ways to download data and produce extracts that transfer protected student information to other campus locations and computers. The history of this information is overwritten with each new request. Disposition of data released outside the central student records office is not monitored.

The revised 1998 AACRAO publication entitled *Guidelines for Postsecondary Implementation of the Family Educational Rights and Privacy Act of 1974 as Amended* states:

An institution should make clear in its FERPA policy that disclosure to a school official having a legitimate educational interest does not constitute authorization to share that information.... Such information, when it has fulfilled its originally specified purpose, should be destroyed or returned to the originating office for appropriate disposition.

According to several sources including the director, student records and registration, the campus cannot create and retain a computer-generated log of distributed data downloaded or extracted from SIS+ because it consumes too much resources. The director, student records and registration, indicated that they do not have the personnel to follow-up on the disposition of distributed data.

By not tracking extracts from SIS+ and monitoring the disposition of protected student records, there is an increased risk of unauthorized access and disclosure and potential FERPA violations.

Recommendation 6

We recommend that the campus:

- a) implement a process for tracking ancillary student record locations and disposition of distributed data; and
- b) ensure that ancillary users fully understand the privacy requirements that encompass student data information in their possession.

Campus Response

The operational recommendation by the Auditors for on-site assessment of the desktop workstations of each user who has received extracted electronic data to determine whether data has been deleted is not practical; rather, the Campus plans to send users who have received student record information extracted from SIS+ a form via e-mail which requires the user to confirm that the data has been deleted. This process of confirmation of data deletion will require a more rigorous system of logging jobs and the systematic generation of appropriate e-mail text and a system for logging responses. There will be a cost in increased clerical effort to manage this system. Completion Date March 30, 2000

REGISTRATION

UNAUTHORIZED GRADING SYMBOL

In lieu of disenrolling students for non-payment of fees, the campus utilizes an unauthorized dollar sign as an administrative grading symbol.

Student records contain a dollar sign to denote those students who have outstanding financial obligations. When the student clears the financial obligation, the hold is removed and an officially approved grade assigned.

Executive Order 268 indicates that the administrative grading symbols of AU, I, RD, SP, W, and U shall be used as circumstances require. It further states that:

No other grading symbols except the traditional A, B, C, D, or F, or the non-traditional A, B, C, CR-NC shall be employed without the express prior approval of the vice chancellor, academic affairs.

The director, student records and registration, indicated that the campus created the dollar sign as a means of standardizing financial holds and providing a method to unofficially capture grades on a contemporaneous basis rather than at a later date when the hold is cleared and the originating faculty member or source documents for the changes might be unavailable.

A dollar sign on student records is inconsistent with systemwide policy and creates an unauthorized and unusual grading symbol in need of further explanation.

Recommendation 7

We recommend that the campus either discontinue use of the dollar sign as a grading symbol or obtain approval from the chancellor's office to perform this practice.

Campus Response

The campus will determine if there are means through programming to maintain the data enabled currently by the use of the dollar sign symbol, and if successful, the campus will discontinue the use of the dollar sign symbol. Otherwise, the campus will pursue approval from the Chancellor's Office for approval for the use of the dollar sign symbol. Completion Date March 30, 2000

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Manuel A. Esteban	President
Caroline Aldrich-Langen	Director, Academic Advising Services
Tom Beckman	Administrative Director – Student Health Center
Jan Burnham	Director, Student Financial Services
Annette Edwards	Director, Financial Aids Office
Mari English	Records Clerk
Aron Graham	Administrative Software Developer
Dennis Graham	Vice President for Business and Finance
Don Graham	Director, Counseling
Darlene Gross	Financial Operations and Personnel Manager – University Housing and Food Services
Robert L. Hannigan	Vice Provost for Enrollment Management
Ron Henning	Supervising Analyst/Programmer
Barney Hope	Chair, Economics Department
Michelle Korte	Financial Analyst for External Reporting and Audits
Deborah Kuechel	Administrative Operations Analyst
Pam Johnstone-Lindemann	Records Supervisor
Linda MacMichael	Director, Admissions and School Relations
Debbie McElroberts	Director, Computing Services
Paula Powell	Registration Supervisor
Bruce Rowen	Director, Student Records and Registration
George Wellman	Director of Financial Services
Noele Winans	Director, Career Planning and Placement
Mike Wood	Coordinator, Technical Support Services – Enrollment Management
Judie Zachai	Director, Testing