

STUDENT RECORDS & REGISTRATION
CALIFORNIA STATE UNIVERSITY,
FRESNO

Report Number 99-28
February 14, 2000

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ABBREVIATIONS

AACRAO	American Association of Collegiate Registrars and Admissions Officers
CASA	Cooperative Administrative Systems Authority
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
STAR	Student Telephone Assisted Registration

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, 320, and 382 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 the 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 systems are products of Systems & Computer Technology 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 systems. The current PeopleSoft implementation schedule has not been finalized. One recent plan has two 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 conclude until early 2006.

The Office of the University Auditor (OAU) 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 Fresno campus is the responsibility of the admissions, records, and evaluations office within enrollment services. The assistant vice president for enrollment services reports to the vice president for student affairs.

The automated system for student recordkeeping at Fresno is the SIMS/R. This system runs on an IBM mainframe computer. During spring 1999, the campus converted from SIMS to SIMS/R. Automated record keeping through SIMS and SIMS/R started in fall 1983.

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

OPINION

We visited the campus from June 13 to August 6, 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. However, as described further in this report, certain systemwide policy requirements have not been met. Some controls and improvements are linked to the recent SIMS/R conversion.

Areas that warrant the attention of management are addressed 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]

BIENNIAL REVIEWS [6]

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

TRANSCRIPT FEE RECONCILIATIONS [7]

Reconciliations of transcripts issued and transcript revenues were not prepared. Timely reconciliations decrease the risk that errors and irregularities will not be detected.

GRADES [7]

COURSE WITHDRAWAL DEADLINE [7]

The campus had accelerated the last date for course withdrawals with a “W” grade from three weeks to four weeks. Establishing course withdrawal procedures consistent with systemwide policy grants students an additional week for which a student may, for serious and compelling reasons, withdraw from a course.

WITHDRAWAL ENDORSEMENTS [8]

The campus president had not appointed an academic administrator to endorse withdrawals in the last three weeks of instruction. Such oversight decreases the risk of withdrawals not based on circumstances clearly beyond the control of the student.

CONFIRMING GRADE TRANSACTIONS [9]

Overall grade/grade change controls were weakened by the absence of confirming documents. Such documents decrease the risk of unauthorized changes and inaccuracies in student records.

CONVERSION OF INCOMPLETE GRADES [10]

Incomplete grades were not immediately converted one year after the term in which they were assigned. Timely conversions reduce the risk of inaccurate grade point calculations.

DATA CONTROL, SECURITY & INTEGRITY [10]

PREVIOUS FEATURES [10]

Several previously available SIMS features were not available in the first SIMS/R release. Implementation of these features would improve system-monitoring capabilities.

ACCESS PRIVILEGES [11]

SIMS/R user access privileges are not integrated with personnel records on employee separations, transfers, and expiration of temporary assignments. Changing SIMS/R access authorizations for separating employees or employees who have transferred jobs would decrease the risk of unauthorized access and/or changes to student records.

RECORD BACKUP AND RECOVERY [12]

The campus had discontinued backup of student records. Appropriate records management decreases the risk of lost or destroyed student records.

REGISTRATION [13]

OUTDATED POLICY [13]

Updating the registration policy manual would reduce the risk of misunderstandings and conflicts in add/drop deadlines.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORD POLICY ADMINISTRATION

BIENNIAL REVIEWS

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

Section D of Executive Order 382 requires the campus to establish procedures for reviewing 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 Chancellor's 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.

Both the registrar and executive director, federal programs and judicial affairs, indicated that student record practices warranting attention are reviewed on an as needed basis and the requirement for formal biennial reviews had not been emphasized.

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

Recommendation 1

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

Campus Response

The campus will reinstitute a process for biennial review of information management practices concerning student records. A campus committee with broad campus representation will conduct a formal review. We anticipate that this review will be completed by September 1, 2000.

TRANSCRIPT FEE RECONCILIATIONS

Reconciliations of transcripts issued and transcript revenues were not prepared.

SAM §20003 requires an effective system of internal control that would include regular reconciliations of transcripts issued to transcript fees collected.

The registrar and accounting services area never emphasized transcript reconciliations.

Failure to reconcile transcript fees with transcripts issued increases the risk that errors and irregularities will not be detected.

Recommendation 2

We recommend that the campus prepare timely reconciliations of transcripts issued and transcript fees collected.

Campus Response

The Registrar and Accounting Office are exploring cost-effective procedures for an automated reconciliation of transcripts issued to transcript fees received. A manual reconciliation will be prepared until a permanent process is in place. A manual reconciliation of transcript fees will be completed by April 30, 2000.

GRADES

COURSE WITHDRAWAL DEADLINE

The campus had accelerated the last date for course withdrawals with a “W” grade from three weeks to four weeks.

Executive Order 268 provides a specific window period for withdrawals from individual courses based on serious and compelling reasons. This period extends from not later than the census date to the last three weeks of instruction. In the last three weeks of instruction, withdrawals ordinarily involve all courses and complete withdrawal from the campus based on circumstances beyond a student’s control.

The fall 1998 registration calendar indicated that the last date to withdraw from a course for serious and compelling reasons was November 6, 1998. The last day of instruction was December 9, 1998. In calculating from December 9, the last three weeks of instruction would have started November 16, 1998 – approximately one week later than the campus imposed deadline.

The registrar indicated that the current timeline was likely a carryover from a scheduling calendar that was changed several years ago.

By establishing the earlier withdrawal cut-off date, the campus is denying students the opportunity to withdraw from individual courses during a portion of the period provided under systemwide policy.

Subsequent to the audit fieldwork, the campus revised the academic calendar to allow students to drop classes as late as the last three weeks of instruction for serious and compelling reasons. The revisions took effect with the Spring 2000 term.

WITHDRAWAL ENDORSEMENTS

The campus president had not appointed an academic administrator to endorse withdrawals in the last three weeks of instruction.

The campus was handling withdrawals made in the last three week of instruction in the same manner as withdrawals made at other times during the term. The same forms were used and the clearance signatures were governed by specialty program needs.

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 registrar indicated that withdrawals previously required an exit interview and approval signature from the counseling center (which may have received a delegation from the president). This requirement has been discontinued.

Failure to obtain the endorsement of an appropriate academic administrator for complete withdrawals in the last three weeks of the term eliminates oversight of the process and increases the risk of withdrawals that are not based on circumstances clearly beyond a student’s control.

Recommendation 3

We recommend that the campus president appoint an academic administrator to endorse withdrawals initiated in the last three weeks of instruction.

Campus Response

The President will issue a memorandum delegating this authority to an appropriate academic administrator. We anticipate that this memorandum will be signed prior to April 30, 2000.

CONFIRMING GRADE TRANSACTIONS

Overall grade/grade change controls were weakened by the absence of confirming documents.

The only grade posting that includes a turnaround document is removing an incomplete to a letter grade after a student has met the conditions for removal. Other important grade transactions include the posting of final grade reports and grade changes.

Confirming transaction documents is an effective control that is prevalent in other record management systems.

The director, enrollment management information systems, indicated that grades were previously confirmed, but the process caused confusion and was not effective among users. The campus is also discussing direct, online entry of grades by faculty.

The absence of confirming documents increases the risk of inaccuracies in student records.

Recommendation 4

We recommend that the campus either confirm grade transactions or, if the faculty enters grades online, design controls for mitigating the risk of unauthorized or inaccurate results.

Campus Response

A procedure has been implemented to send confirmation of grade transactions (grade changes, corrections, and grade delays) to faculty. Faculty are sent a copy of these grade transactions after they are entered into the student record. The campus plans to implement a pilot for the spring 2000 semester that allows faculty to submit end of term grades online. This procedure has print capability that allows faculty to immediately print and verify grades assigned.

CONVERSION OF INCOMPLETE GRADES

Incomplete grades were not immediately converted one year after the term in which they were assigned.

Our test of incomplete grades from the fall 1997 term indicated that those grades not cleared within the first year after they were assigned did not get converted until the campus ran a SIMS printout on 6/4/99.

Executive Order 268 states:

An Incomplete shall be removed within one year following the end of the term during which it was assigned.... If an incomplete is not removed within the prescribed time limit or any extension thereof, it shall be counted as a failing grade in calculating grade point average and progress points.

The registrar indicated that changing incomplete grades is not a priority. She indicated that it is not important that they be counted as failing grades until immediately before the campus generates academic probation notices.

Failure to change incomplete grades to letter grades during the appropriate time frame increases the risk of confusion in both the grading process and the calculation of grade point averages.

Recommendation 5

We recommend that the campus convert incomplete grades to letter grades within a one-year period after the term in which they were originally assigned.

Campus Response

The campus has a procedure for conversion of incomplete grades within the one-year period but was allowing an additional one-semester grace period. The campus recently converted Fall 1998 incomplete grades to letter grades. A copy of the report confirming the change is enclosed. The campus is now current as far as this recommendation is concerned.

DATA CONTROL, SECURITY & INTEGRITY

PREVIOUS FEATURES

Several previously available SIMS features were not available in the first SIMS/R release.

The campus was using some SIMS features that were lost temporarily in the conversion to SIMS/R in March 1999 including:

- ▶ forcing password changes on first use and at periodic intervals;
- ▶ defining highly sensitive data elements and auditing changes;
- ▶ running weekly grade change reports; and
- ▶ deriving full user names from email acronyms.

The campus is one of four participants in Cooperative Administrative Systems Authority (CASA) that oversees SIMS/R (formerly SIMS). CASA decided what SIMS features would be deferred to subsequent SIM/R releases.

The present level of SIMS/R does not take full advantage of previously available SIMS features resulting in a reduction of the monitoring function of the system.

Recommendation 6

We recommend that the campus encourage CASA to expedite SIMS/R releases addressing previously used SIMS features.

Campus Response

The campus has complied with the recommendation that we encourage CASA to expedite SIMS/R releases. The campus is working closely with CASA to implement the software changes recommended in respect to defining sensitive data elements and auditing changes. The target date for release is March 30, 2000. We will implement these enhancements as soon as the upgrade is installed. Software changes regarding USERID and passwords are targeted for completion in Spring 2001.

ACCESS PRIVILEGES

SIMS/R user access privileges are not integrated with personnel records on employee separations, transfers, and expiration of temporary assignments.

At the time of our review, the system administrator for SIMS/R was not informed of employee separations and transfers that might affect SIMS/R access privileges. Additionally, employees who were recruited for temporary assignments, such as entering grades at the end of each term, did not have their authorizations discontinued at the end of their assignments.

The federal Family Educational Rights and Privacy Act of 1974 and regulations adopted thereunder and California Education Code Section 67100 et. seq. set out requirements designed to protect the privacy of student records maintained by the campus.

The director, enrollment management information systems, indicated that the department is working with the campus personnel office to receive timely information on employee separations and transfers.

Lapses in the control of access privileges to the student records data system could result in unauthorized access, changes and/or destruction of critical student record information.

Recommendation 7

We recommend that the campus develop and employ a system for relating employee separations, transfers and changes in job duties to SIMS/R access privileges.

Campus Response

We have complied with this recommendation. A process has been implemented to assure that SIMS/R access is removed from employees who separate from the campus or whose job duties have changed. The Human Resources office, upon learning of a change in employment status, notifies appropriate campus officials by e-mail of the change. Nancy Bjordahl, Director of Enrollment Services Information Systems, is included in the notification list. Ms. Bjordahl is responsible for SIMS/R access security. An example of a notification message is enclosed.

RECORD BACKUP AND RECOVERY

The campus had discontinued backup of student records.

The revised 1998 AACRAO publication entitled *Retention of Records: Guide for Retention and Disposal of Student Records* indicates that an institution must establish a record retention program that provides for appropriate backup and use of storage methods.

According to the registrar, the campus had been actively microfilming student records until the camera broke down. Maintenance of this equipment had become costly and they were debating whether it was worthwhile.

Lack of record backups increases the risk that the campus could lose important student record information in the event of a disaster.

Recommendation 8

We recommend that the campus decide on and commit to a method for storage of student records and resume backups.

Campus Response

The campus has routinely run a computer back-up of student academic records since SIMS was implemented in 1983. A full back-up of all academic and demographic data is run by the office of Information Technology Services daily and stored in a secured facility off campus. However, the campus has discontinued microfilming pre-SIMS records for back-up purposes because microfiche and microfilm are old technologies. We are exploring investment in electronic imaging technology as a system for management as well as storage of permanent student records. By September 1, 2000, we will have a consultant review our existing records storage system and provide us with a cost analysis for implementing an imaging system.

REGISTRATION

OUTDATED POLICY

The campus was not following its Academic Policy Manual (APM) with respect to adding and dropping classes.

The APM states that:

Classes may be added or dropped without a serious and compelling reason through the tenth day of instruction.

This policy was approved in May 1991. Since that time, actual practice has been changed to allow the dropping, without a serious and compelling reason, only through the seventh day of instruction. The change of program cards, the campus catalog, and the schedule of courses indicate that the deadline is the seventh day of instruction.

The registrar indicated that the deadline was changed several years ago to encourage earlier student decisions and better use of resources. She further stated that the manual revisions to reflect this change must have been overlooked.

An inconsistency between policy sources causes unnecessary confusion to students.

Recommendation 9

We recommend that the campus update the Academic Policy Manual to bring it into conformance with actual practice on add/drop deadlines.

Campus Response

The campus will update its Academic Policy Manual to accurately reflect policy with respect to adding and dropping classes. We anticipate that a policy addendum will be issued by April 30, 2000. The policy statement will be consistent with that printed annually in the campus catalog.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
John Welty	President
Josie Almeida	Manager, Student Financial Services
Richard Arndt	Director, Advising and Testing Services and Chair, Student Academic Petitions Committee
Jeanie Artist	Operations Specialist – Enrollment Services Information Systems
Cindy Banuelos	Administrative Assistant to Registrar
Tina Beddall	Registrar
Nancy Bjordahl	Director of Enrollment Information Systems
Robin Button	Administrative Assistant, Department of Criminology
Rik Clausen	Associate Director, Administrative Services – Information Technology Services
Vivian Franco	Interim Director, Admissions, Records & Evaluations
Mark Hays	Systems Analyst – Enrollment Services Information Systems
Diane Hazeltine	Administrative Assistant, Department of Foreign Languages and Literature
Robert Hernandez	Executive Director, Federal Programs and Judicial Affairs
Karen Johnson	Administrative Assistant, Department of Industrial Technology
Hope Lindau	Systems Analyst - Enrollment Services Information Systems
Donna Mills	Assistant to Vice President for Student Affairs
Kathy Pawlowski	Administrative Assistant to Provost
Glori Riojas	Administrative Assistant, Department of Computer Science
Chris Robinson	Internal Auditor
Judy Sakaki	Vice President, Student Affairs and Dean of Students
Sue Shaw	Administrative Assistant, Department of Nursing
Patricia Tift	Administrative Assistant to the Vice President for Administration
Bob Vega	Director, Accounting Services
Bernie Vinovrski	Assistant Vice President for Enrollment Services