

**STUDENT RECORDS & REGISTRATION**

**CSU, NORTHRIDGE**

**Report Number 99-29**

**December 7, 1999**

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## **ABBREVIATIONS**

AACRAO	American Association of Collegiate Registrars and Admissions Officers
CSU	California State University
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
SMART	San Marcos Access Resources Telephone System

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## INTRODUCTION

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### 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 amount 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.

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### 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.

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## 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 (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 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. This plan will phase in over a period of time and may not commence until late 1999 and 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 CSU Northridge campus is the responsibility of admissions and records, which is under the direction of the director of articulation, admissions and records. The director reports to the associate vice president for undergraduate studies.

The automated system for student recordkeeping at CSU Northridge is the Student Information Management System/Relational (SIMS/R). This system runs on a Sun 3500 server.

Registration at the Northridge campus is predominantly accomplished by students via a touch tone telephone system.

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## OPINION

We visited the campus from June 28 to August 19, 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;
- ▶ 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, within the centralized student records area, certain systemwide policy compliance requirements had not been met. As described further in the report, we have reservations about the level of protection provided to student record information by the campus. Additionally, improved control procedures for grades and grade changes are needed. Areas that warrant management's attention are addressed in the executive summary.

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## **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 had not been conducting biennial reviews of information management practices concerning student records. Conducting such biennial reviews helps to ensure that student records are appropriate and continually evaluated.

#### **RECORD ACCESS LOG [7]**

Student record request logs maintained by the admissions and records office did not always contain the purpose for which the information was requested. Documenting the legitimate interest of parties requesting student record information helps to ensure that accurate and complete records are maintained.

### **GRADES [7]**

#### **MEDICAL WITHDRAWALS [7]**

Campus signature requirements on withdrawals for medical reasons circumvent systemwide policy. Complying with systemwide signature requirements would ensure proper authorization of withdrawals.

## **MEDICAL WITHDRAWALS ANNUAL REPORTS [9]**

Annual reports of all partial and full medical withdrawals were not prepared and forwarded to the educational policies committee as required. Preparing and submitting annual reports helps to ensure effective oversight of medical withdrawals.

## **GRADE CHANGES [10]**

Grade changes were not always confirmed by the course instructor or the academic department. Confirming grade changes helps to ensure that grade postings are accurate.

## **UNAUTHORIZED GRADING SYMBOL [11]**

The campus was utilizing an unauthorized grading symbol to indicate an incomplete grade counted as an "F." To maintain a common systemwide grading methodology, Chancellor's Office approval of non-standard grading symbols is warranted.

## **DATA CONTROL, SECURITY & INTEGRITY [12]**

### **TRACKING CONTROLS [12]**

User input controls in place under SIMS were not carried forward in the conversion to SIMS/R. Establishing user input controls ensures that a system of data entry tracking is in place.

### **ACCESS PRIVILEGES [13]**

User access privileges of separating employees were not always terminated in a timely manner. The timely termination of user access privileges helps to prevent unauthorized access of student record information.

### **BACKUP TAPES [13]**

The campus backup tapes of SIM-R data and software were not being stored offsite. In the event of a disaster, offsite storage of backup tapes would minimize both the risk of disruption to operations and the cost of recreating data.

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# OBSERVATION, RECOMMENDATIONS, AND CAMPUS RESPONSES

## STUDENT RECORD POLICY ADMINISTRATION

### BIENNIAL REVIEWS

The campus had 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 the campus' information management practices 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 assistant vice president for student life indicated that he was not aware of the requirement.

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

### Recommendation 1

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

### Campus Response

Agree. As the President's designee for student records administration, and the custodian of student records, the Vice President for Student Affairs will initiate a review of campus student records practices. Said review will include each of the analyses listed in Section D of Executive Order 382. In addition, the review will determine whether current procedures are adequate to address the current requirements of both the Family Educational Rights and Privacy Act and the California Information Practices Act.

Revisions to the existing campus policy will be proposed, including a plan for biennial reviews, to the President. Upon approval by the President, the results of the review will be forwarded to the Chancellor along with the revised campus policy. Future biennial reviews will be completed and results forwarded to the Chancellor. The corrective action is in process and will be implemented by May 30, 2000.

## **RECORD ACCESS LOG**

Student record request logs maintained by the admissions and records office did not always contain the purpose for which the information was requested.

Executive Order 382, Section B, states that each campus shall maintain a log that lists all persons, agencies, or organizations requesting or receiving information from the record and the legitimate interest these parties had in requesting or obtaining the information.

The admissions and records advisor responsible for governmental information requests stated that the form presently used to log information was in use when she arrived at the campus and she continued to use it.

Failure to document the legitimate interest of parties requesting student record information may expose the university to the risk of legal liability.

### **Recommendation 2**

We recommend that the campus improve practices for documenting the purpose for which student information is requested.

### **Campus Response**

Agree. The student record access log has been revised to contain an area for the purpose of the request and to verify that these parties have a legitimate interest in requesting or obtaining the information an appropriate form of identification will be required. The Director of Articulation, Admissions and Records is responsible for the correction action, which is in process and will be completed June 30, 2000.

## **GRADES**

### **MEDICAL WITHDRAWALS**

Campus signature requirements on withdrawals for medical reasons circumvent systemwide policy.

Executive Order (EO) 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 the census date and prior to the last three weeks of the instruction are permissible 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 chairman or dean. All requests to withdraw under these circumstances and all approvals shall be made in writing on forms prescribed by the campus. The requests and approvals shall state the reason for the withdrawal. Copies of such approvals shall be kept on file.

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 and the assignment of an Incomplete is not practicable. Ordinarily, withdrawals of this sort will involve total withdrawal from the campus, except that credit, or an incomplete may be assigned for courses in which sufficient work has been completed to permit an evaluation to be made. 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.

Upon recommendation by the faculty senate, the campus president approved a new policy on July 20, 1995 that provides for the director of the health center to evaluate medical withdrawal requests. If the documentation supports partial withdrawals, such an option may be exercised. These requests require only that the instructor sign the form subject to the following disclosure:

Your signature on this form does not indicate approval or disapproval of the student's request to drop your class. It is only an acknowledgement that you are aware that the student will not be returning.

During faculty senate committee deliberations, members noted "numerous instances where complete withdrawal had not been in the best interest of either the university or the student, but the prior policy had forced complete withdrawal nonetheless."

Without the approval of the instructor, department chair, or school dean, medical withdrawals are not properly authorized.

### **Recommendation 3**

We recommend that the campus comply with Executive Order 268 in approving withdrawals for medical reasons.

### Campus Response

Agree. The campus will:

- a. Request Educational Policies Committee to rescind the partial medical withdrawal policy passed July 20, 1995 to bring the campus into compliance with Executive Order 268 and systemwide policy. The Associate Vice President for Undergraduate Studies is responsible for the corrective action, which will be implemented by March 31, 2000.
- b. Implement a new medical withdrawal request form conforming to the need for approval of the instructor, department chair, and college dean. The form will require that all medical provider verifications for medical withdrawals be original documents on provider's letterhead, that they specify the onset dates and estimate the time when the student may be expected to resume studies. The Director of Undergraduate Studies and the Assistant Vice President for Student Affairs are responsible for the corrective action, which will be implemented by March 31, 2000.

### MEDICAL WITHDRAWALS ANNUAL REPORTS

Annual reports of all partial and full medical withdrawals were not prepared and forwarded to the educational policies committee as required.

The campus medical withdrawal policy provides that the educational policies committee is to receive a yearly report that will include the number of complete and partial medical withdrawals granted.

The vice president for student affairs and director of the student health center stated that the educational policies committee had not requested these reports, and none was provided.

We examined medical withdrawals for Spring 1996 through Spring 1999 and found the following:

Table 1  
Medical Withdrawals  
Spring 1996 to Spring 1999

Term	Partial	Complete	Total
Spring 1996	82	233	315
Fall 1996	106	216	322
Spring 1997	154	251	405
Fall 1997	172	212	384
Spring 1998	184	197	391
Fall 1998	165	207	372
Spring 1999	205	213	418

As noted in Table 1, the number of partial and full medical withdrawals has steadily increased since 1996. Particularly, partial medical withdrawals have more than doubled from 1996 to 1999.

Effective oversight of the number of medical withdrawals cannot be accomplished without periodic statistical data reports.

#### **Recommendation 4**

We recommend that annual reports of partial and full medical withdrawals are prepared and forwarded to the educational policies committee.

#### **Campus Response**

Agree. An annual report of medical withdrawals will be prepared by the Assistant Vice President for Student Services using data collected by the Student Health Service and forwarded to the Educational Policies Committee by July 1 each year. The report will show the number of each type of withdrawal by semester calendar period and any other statistical data along with analysis of trends. The Student Health Service will maintain a log and complete document files for each medical withdrawal processed. The Assistant Vice President for Student Affairs is responsible for the corrective action, which will be implemented by June 30, 2000.

### **GRADE CHANGES**

Grade changes were not always confirmed by the course instructor or the academic department.

The preferred practice in the detection of errors and irregularities in processing grades is a confirmation whereby grade postings are returned to course instructors for verification.

Our review in this area consisted of a visit to five academic departments at the campus assessing the adequacy of internal controls for grade submittals and grade changes. Three departments did not forward grade change reports to course instructors, but confirmed the accuracy of the grade change posting by comparing the recorded grade to grade changes submitted by the course instructor. Two departments did not forward reports to faculty or confirm grades to their records.

Without a confirmation process, the campus risks unauthorized and erroneous grade changes going undetected.

#### **Recommendation 5**

We recommend that the course instructors or the academic department confirm all grade changes.

### **Campus Response**

Agree. When Correction of Grade forms are received in Admissions and Records, a monthly confirmation report will continue to be sent back to the department initiating the grade change. The department and instructor will compare the confirmation report to the departmental copy of the Correction of Grade form for discrepancies. The department will then notify Admissions and Records of any necessary corrections. The Interim Provost and Vice President for Academic Affairs is responsible for the corrective action, which will be implemented June 30, 2000.

### **UNAUTHORIZED GRADING SYMBOL**

The campus was utilizing an unauthorized grading symbol to indicate incomplete grades.

The campus utilizes an “IC” grade to denote an incomplete charged to the student – an “I” that did not get cleared. Initially, instructors use an “I” grade for incompletes and an “I” is posted to the student’s record. If the course work is not completed after one year (with no approved extensions), the “I” reverts to an “IC”. Although the “I” does not revert to a “F,” it is recognized as a failing grade in calculation of the grade point average.

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 registrar indicated that the “IC” is a SIMS/R convention that was necessary to differentiate an “I” that was still in process versus an “I” charged against the student and calculated as a failing grade in grade point averages.

Not maintaining an effective campus control system for grading symbols may result in inaccuracies in student records and misrepresentation of grading symbols.

### **Recommendation 6**

We recommend that the campus either discontinue use of the “IC” or obtain Chancellor’s Office approval for the current practice.

### **Campus Response**

Agree. The campus will request that the Chancellor's Office adjust Executive Order 286 concerning grading symbols and add the symbol IC (Incomplete Charged). If this request is not approved, the campus will utilize an existing approved methodology of recording charged incompletes. The Director of Articulation, Admissions and Records is responsible for the corrective action, which will be implemented June 30, 2000.

## **DATA CONTROL, SECURITY & INTEGRITY**

### **TRACKING CONTROLS**

User input controls in place under SIMS were not carried forward in the conversion to SIMS/R.

Under SIMS, users making changes to student records were tracked by the date of the transaction and user identification number (ID). However, under SIMS/R, users making changes to student records are not tracked.

SAM §20003 states that a satisfactory system of internal control includes procedures to be followed in the performance of job duties and responsibilities.

The director of articulation, admissions and records, stated that this control would be added as upgrades are made to SIMS/R.

Unauthorized user changes could go undetected for long periods without a user tracking control system in place.

### **Recommendation 7**

We recommend that the campus update its student information management system to include user activity tracking controls.

### **Campus Response**

Agree. The vendor of the student information management system (CSU Cooperative Administrative Systems Authority) has informed the campus that delivery of the SIMS/R Auditing structure is targeted for March 30, 2000. This release will be installed at CSUN as soon as it is received. The Director of Articulation, Admissions and Records and the Associate Vice President for Academic Resources/CIO are responsible for the corrective action, which will be implemented May 30, 2000.

## **ACCESS PRIVILEGES**

User access privileges to the student records data system were not always terminated in a timely manner.

During the period January to June 1999, three of five separating admissions and records office employees did not have their user privileges terminated timely.

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 students concerning their records maintained by the campus.

The computer operations manager stated that he and his staff terminate access privileges only when directed to do so. However, he was unable to provide copies of these requests.

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

### **Recommendation 8**

We recommend that the campus terminate student records access privileges of separating employees more timely.

### **Campus Response**

Agree. The University implemented a revised Faculty and Staff Separation Clearance Process in October 1999 that required each department to immediately notify Computer Operations in ITR of the need to revoke any computer access for faculty and a staff who have recently separated from the university. The notification will be included and automated in the PeopleSoft software implementation to enable Computer Operations to revoke access to all university computer systems immediately after separation. The current process will be reviewed and any necessary modifications will be appropriately incorporated into PeopleSoft. The Director of Human Resources and the Associate Vice President for Academic Resources/CIO are responsible for the corrective action including PeopleSoft, which will be implemented by June 30, 2000.

## **BACKUP TAPES**

The campus backup tapes of SIMS/R data and software were not being stored off-site.

Regular off-site backup of computer data is a critical component of the computing services disaster recovery plan.

The campus computing operations manager stated that since the conversion from SIMS to SIMS/R, there has been no off-site storage of backup tapes because the new application is still in production and has not been released by programming to systems operations.

In the event of a disaster, transactions entered into and processed by this system could be permanently lost or the campus could incur significant cost in recreating the data.

**Recommendation 9**

We recommend that the campus begin off-site storage of its SIMS/R backup tapes.

**Campus Response**

Agree. Computer Operations personnel are presently re-evaluating the comprehensive tape backup and offsite storage procedures for improvement to continue and safeguard all University computer data from either accidental or deliberate loss or destruction. The Associate Vice President for Academic Resources/CIO is responsible for the corrective action, which will be completed by June 30, 2000.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Louanne Kennedy	Interim President
Suzy Babikin	Supervisor, Admissions and Records
Jeff Craig	Director, Network Administration
Robert Dane	Director, Undergraduate Studies
Peter Dinauer	University Internal Auditor
Robin Ferguson	Administrative Assistant to the Vice President for Student Affairs
Eric Forbes	Director of Operations, Admissions & Records
Don Foster	Computer Operations Manager
Janice Griffin	Manager of Operations, University Controller's Office
Robert Kiddoo	University Controller
Magnhild Lien	Chair, Department of Mathematics
Steve Montgomery	Director of Human Resources
James Moore	Director, Central Computing Services
Lorraine Newlon	Director of Articulation, Admissions & Records
Bob Noreen	Chair, Department of English
William Rivers	Chair, Department of Mechanical Engineering
Delia Rudiger	Chief of Staff to the Interim President
James Sullivan	Vice President for Administration and Finance
William Watkins	Assistant Vice President for Student Life
Peter Weigand	Chair, Department of Geological Sciences
Dorothy Weisinger	Supervisor, Admissions and Records
Earl Weiss	Chair, Department of Accounting and MIS