

STUDENT RECORDS & REGISTRATION

**CALIFORNIA STATE UNIVERSITY,
LOS ANGELES**

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ABBREVIATIONS

AA	Academic Affairs – a division in the Office of the Chancellor
AACRAO	American Association of Collegiate Registrars and Admissions Officers
CSU	California State University
EO	Executive Order
FERPA	Family Education Rights and Privacy Act
I	Incomplete - an administrative grading symbol authorized by EO 268
IN	Incomplete
IRM	Information Resources Management
OUA	Office of the University Auditor
PRC	Permanent Record Cards
RD	Report Delayed - an administrative grading symbol authorized by EO 268
SCT	Systems & Computer Technology Corporation
SIMS/R	Student Information Management System/Relational
SIS+	Student Information System Plus
STAR	Student Telephone Assisted Registration
U	Unauthorized Incomplete - an administrative grading symbol authorized by EO 268
W	Withdrawal – an administrative grading symbol authorized by EO 268

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 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

INTRODUCTION

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 (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 Los Angeles campus is the responsibility of the registrar's office, which is supervised by a director of student records and registration. The director of student records and registration reports to the associate vice president for academic affairs.

The automated system for student recordkeeping at Los Angeles is the Student Information System Plus (SIS+) from SCT Corporation that runs on an IBM mainframe computer. Beginning in Fall 1988, student records data was entered in SIS+. Prior to Fall 1988, student records were maintained on a permanent record cards.

Registration at the Los Angeles 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 July 26, 1999 to August 27, 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, within the centralized student records area, certain systemwide policy compliance requirements had not been met. Additionally, improved control procedures for grades and grade changes are needed.

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 [7]

POLICY UPDATING [7]

The campus student records policy was outdated. Maintaining a current student records policy decreases the risk of federal Family Education Rights and Privacy Act (FERPA) misinterpretations and failure to implement changes.

BIENNIAL REVIEWS [8]

The campus has not been conducting biennial reviews of student records information management practices. Biennial reviews help to ensure the appropriateness of such information practices.

SUBPOENAED RECORDS [9]

The campus procedures for processing subpoenas did not always include timely student notification and appropriate documentation. Timely notification of subpoenas to students of subpoenas and adequately documenting subpoena deviations helps to mitigate any legal liability.

GRADES [10]

WITHDRAWAL “W” DOCUMENTATION [10]

Documentation regarding reasons for student withdrawals was inadequate. Capturing “W” documentation would complete the student record.

GRADE CHANGE CONTROLS [11]

Lapses in particular types of transactions and/or departments weakened grade change controls. Enforcing these controls strengthens the campus system and provides an additional measure of protection against possible student records inaccuracies.

GRADE ROSTERS [12]

Grade roster controls were weakened by lapses in particular types of transactions and/or departments. Maintaining an effective campus control system for grading results reduces the risk of recording inaccurate student grades.

ADMINISTRATIVE GRADING SYMBOL [13]

The administrative grading symbol “RD” (Report Delayed) was not timely replaced with a substantive grade. Maintaining an effective campus control system for grading symbol use reduces potential inaccuracies in student records and ensures appropriate calculation of grade point averages.

UNAUTHORIZED GRADING SYMBOL [14]

The campus was utilizing an unauthorized “IN” grading symbol to indicate incomplete grades. Chancellor’s office approval of non-standard grading symbols is warranted to maintain a common systemwide grading methodology.

ANNUAL REPORTING [15]

The student grievance committee did not prepare and submit an annual report on grade appeals to the campus president and faculty senate/council as required. Preparing and submitting annual reports helps to ensure executive level oversight of grade the appeals process.

DATA CONTROL, SECURITY & INTEGRITY [16]

SYSTEM ACCESS [16]

Procedures for deleting user access to SIS+ were deficient. Adequate procedures for deleting user access reduce the risk of security breaches.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORD POLICY ADMINISTRATION

POLICY UPDATING

The campus student records policy was outdated.

The policy was maintained in the administrative procedures manual dated April 10, 1989, and is used as an internal operating document. This policy was not made available to students.

Campus Administrative Manual 011, Student Records Administration, dated April 10, 1989, 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, requires 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 administrative assistant for the office of student affairs indicated she was unaware of the policy that information other than that already provided should be accessible to students from a central location.

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 ensure that the administrative procedures manual is appropriately updated, made available to students, and currently maintained.

Campus Response

Updates to the Student Records Administration procedures have been drafted and will be implemented before March 31, 2000. The updates will include current FERPA regulations and will be available to students from the Student Affairs Office and its web page.

BIENNIAL REVIEWS

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

Section D of Executive Order (EO) 382, Privacy and Personal Information Management, Student Records Administration, with an effective date of March 10, 1982, requires each 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 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.

The vice president for information resources indicated that she was under the assumption that the reviews were no longer required once reporting to the Chancellor's Office was discontinued.

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

Procedures to resume biennial reviews have been implemented. The initial review was performed in connection with completing Recommendation 1. The next review of information practices concerning student records will be conducted in December 2001 and every other year thereafter.

SUBPOENAED RECORDS

The campus procedures for processing subpoenas did not always include timely student notification and appropriate documentation.

We noted the following:

- ▶ on four of the ten subpoenas reviewed, the campus provided the student less than one week of advanced notification; and
- ▶ amendments to the disposition/completion date were not being documented. Six of the ten subpoenas reviewed were disposed of after the date documented on the subpoena.

Part IV of the Records Access Manual issued by the Office of the General Counsel states that as long as an effort is made to notify the student, there is no need for written consent from the student when responding to a subpoena.

The employee relations coordinator indicated that the subpoenas are forwarded to responsible departments for processing, and the appropriate department mails the notification letters. The assistant registrar for records indicated that notification letters are mailed upon receipt from human resources.

Untimely processing of subpoenas could increase the university's exposure to legal liability.

Recommendation 3

We recommend that the campus:

- a. enhance procedures to improve the notification time of subpoenas to students; and
- b. ensure that appropriate documentation is obtained to support the extension of disposition dates.

Campus Response

New procedures were implemented by Human Resource Management (HRM) in February, 2000, to monitor and track subpoenas. HRM will maintain a log of incoming subpoenas, track its progress, and follow up as necessary. Also, notification letters to students will be coordinated by HRM.

GRADES

WITHDRAWAL "W" DOCUMENTATION

Documentation regarding reasons for student withdrawals was inadequate.

We noted the following:

- ▶ supporting documentation presented by the student to obtain approval for withdrawal was not maintained as a part of the student's permanent record, and as a result, the reason for the withdrawal was not stated;
- ▶ no withdrawal form was found to support one student's withdrawal; and
- ▶ instructors were erroneously bubbling in a "W" grade on the grade roster instead of a "U" grade. The "U" grade indicates an unauthorized incomplete and is used in the GPA calculation as a failing grade.

Executive Order (E.O.) 268, *Grading Symbols*, dated September 1, 1977, requires a progressively more difficult set of 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 instruction are permissible only for serious and compelling reasons. 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 reasons for the withdrawal. Copies of such approvals shall be kept on file.

The symbol "U" shall be used where a student, who is enrolled on the Census Date, does not withdraw from a course but fails to complete it. The symbol "U" denotes failure of the course, shall be identified as a failing grade in the transcript legend, and shall be counted as units attempted but not passed in computing the grade point average.

The registrar indicated that faculty are provided instructions on how to complete the scantron form grade rosters on a quarterly basis and should know not to bubble in a "W" grade. Further, the registrar doesn't interpret EO 268 to require that supporting documentation be maintained as part of the student's permanent record.

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

Recommendation 4

We recommend that the campus:

- a. strengthen procedures to ensure that all requests and approvals state a reason for the withdrawal; and
- b. strengthen procedures to ensure that all instructors are using the appropriate grading symbols when assigning student grades.

Campus Response

Procedure updates have been implemented. The Program Change Form has been revised to include a section for the reason for withdrawal. Grading instructions to faculty (attached to grade rosters) have been updated to identify appropriate and inappropriate uses of grading symbols "U" and "W".

GRADE CHANGE CONTROLS

Lapses in particular types of transactions and/or departments weakened grade change controls.

We noted the following inadequacies with the twenty-five grade changes reviewed:

- ▶ on four occasions, the approving signature did not correspond to the authorized signature cards;
- ▶ one department had no authorized signature card on file; and
- ▶ one grade change form had no explanation for the change.

Campus Grade Change Form. For each grade transaction, the Student Grade Change Form must be completely filled in, signed by the authorized signatory, and taken to the office of admissions and records.

CSLA Academic Senate, Faculty Handbook – Instructional Policies, Change of Grade (dated 12/90) states:

All grades submitted to the records office are final except in the case of a clerical error. An instructor may not change a grade at the request of a student for special consideration unless the grade submitted was erroneously reported. This regulation exists for the protection of the instructor and is not intended to violate the instructor's prerogative of assigning the original grade.

The assistant registrar for records indicated that grade change forms are checked against signature cards if the signature appears to be unusual or not familiar to the recorder.

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

Recommendation 5

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

Campus Response

Procedure updates have been implemented. The missing signature card was replaced in February, 2000. Starting with the Spring Quarter 2000, the Records Office will perform periodic reviews to ensure that signature cards are properly maintained. Also, in a Memorandum distributed in March 2000, staff from the Records Office was instructed to follow existing grade change procedures.

GRADE ROSTERS

Grade roster controls were weakened by lapses in particular types of transactions and/or departments.

The following grade inadequacies were noted with the twenty rosters reviewed:

- ▶ on one occasion the instructor did not sign the completed grade roster; and
- ▶ on three rosters, the instructor did not initially record a machine-readable grade. In order for these rosters to pass machine edits, the registrar administratively assigned “RD” grades.

The Academic Senate, Faculty Handbook – Instructional Policies, Grade Reporting (dated 8/19/80) states:

Grade sheets on which to record final grades are distributed to instructors during the closing weeks of the quarter. These sheets are to be returned in person by the instructor to the department office as soon as possible after each final examination, and not later than the deadline announced by the Registrar. If the instructor of record cannot or does not assign a grade, the department chair is required to assign that responsibility to a qualified faculty member (or members).

The registrar indicated that the faculty turns in their completed grade rosters to their academic department. Their department reviews the rosters and then personally delivers them to the records office. Records quickly scans each grade roster to ensure that the scantron grades are in pencil and dark enough to be machine read successfully. It is not possible for each roster to be reviewed by the

record's office for accuracy at the time of turn-in due to the volume that is received and the turn around time required to get the grades scanned and posted to the student's record.

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

Recommendation 6

We recommend that the campus strengthen procedures to ensure that all grade rosters are adequately reviewed and properly completed prior to delivery to the registrar.

Campus Response

Procedure updates have been implemented. Department Chairs and their staff were reminded of their responsibility to ensure that grade rosters collected from their faculty are properly completed. The reminder memorandum was distributed in February 2000.

ADMINISTRATIVE GRADING SYMBOL

The administrative grading symbol "RD" (Report Delayed) was not timely replaced with a substantive grade.

At the time of our visit, approximately 1,500 students were identified who still had a grade of "RD" on their permanent records. Some of these RD grades were two years old as indicated in the following table:

TERM	RDs
Fall 1997	410
Winter 1998	159
Spring 1998	175
Summer 1998	82
Fall 1998	189
Winter 1999	185
Spring 1999	339
Total	1,539

Executive Order (E.O.) 268, Grading Symbols, dated September 1, 1977 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. A "RD" shall not be used in calculating grade point average or progress points.

The registrar indicated that reports of those instructors who are tardy in submitting grades are sent out for follow-up with no response.

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

Recommendation 7

We recommend that the campus strengthen procedures to ensure that "RD" grades are replaced timely with a substantive grade.

Campus Response

Procedure updates have been implemented. Beginning with the Winter Quarter 2000, in addition to the Instructors, the list of students with "RD" grades will also be sent to the Department Chairs and School Deans quarterly. Also, on March 6, 2000, a letter from the Provost and Vice President for Academic Affairs was sent to Campus faculty reminding them of the need to replace the "RD" with a substantive grade in a timely manner.

UNAUTHORIZED GRADING SYMBOL

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

The campus utilizes an "IN" grade to indicate incomplete status. If the course work is not completed after one year (with no approved extensions), the "IN" reverts to an "I" for traditional grading and to "NC" for non-traditional grading. Although the "I" does not revert to an "F", the GPA is calculated as a failing grade. Additionally, there is no footnote on the official transcript to define the meaning on the "IN" symbol.

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 she thought the "IN" had been approved by the Chancellor's Office but they could not locate the approval documentation. The registrar's system coordinator indicated that the E.O. only required them to use a failing grade in the calculation of GPA and not actually revert the grade to an "F."

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

Recommendation 8

We recommend that the campus either discontinue use of the “IN” and revert “I” grades to “F” or provide a footnote explanation on all transcripts.

Campus Response

Procedure updates have been implemented. A footnote explaining the "IN" grade has been added to the official transcript legend.

ANNUAL REPORTING

The student grievance committee did not prepare and submit an annual report on grade appeals to the campus president and faculty senate/council as required.

Executive Order (E.O.) 320, Assignment of Grades and Grade Appeals, dated January 18, 1980, requires each campus to implement policies and procedures establishing a provision for annual reporting to the President and campus faculty Senate/Council on the number of cases heard and the disposition of each case.

Due to recent changes in management, the vice-president of student affairs was unaware of annual reporting policies and procedures.

The absence of feedback from the student grievance committee reduces management effectiveness, oversight of grading, and the grade appeals process

Recommendation 9

We recommend that the student grievance committee prepare and submit grade appeal reports as required.

Campus Response

Procedure updates have been implemented. Beginning with this year, at the end of each academic year, the University Student Grievance Committee will submit a report to the Campus President on grade appeals. For this year, the Grievance Report will be completed by July 1; thereafter it will be completed by August 15.

DATA CONTROL, SECURITY & INTEGRITY

SYSTEM ACCESS

Procedures for deleting user access to SIS+ were deficient.

Revoking systems access for separated employees was not completed timely.

The following was noted:

- ▶ three of five separating employees were not removed timely; and
- ▶ one separation file could not be located.

SAM §20003 requires, in part, that a plan be in place to limit access to State agency assets for authorized personnel who require these assets in the performance of their assigned duties.

The programmer analyst indicated that the lack of communication between the human resources and information technology departments contributed to an untimely revoking of computer access of terminated/separated employees.

Not maintaining adequate controls in the employee separation process increases the risk of unauthorized access.

Recommendation 10

We recommend that the campus strengthen procedures to ensure that computer access on all terminated/separated employees is revoked on a timely basis.

Campus Response

Procedure updates have been implemented. Beginning in March 2000, the Payroll Office will provide Information Resource Management (IRM) with a monthly listing of separated employees. Using this listing, IRM will on a monthly basis revoke the OASIS accounts for separated employees.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Jim Rosser	President
Kathy Anderson	Assistant to the Registrar
Ruth Bailey	Department Secretary, Criminal Justice
Karl Beeler	Assistant Vice President, Student Affairs - Enrollment Management
Carie Briscoe	Office Manager, Academic Technology Support
Desdemona Cardoza	Vice President for Information Resources Management
Hildebrando Dominguez	Employee Relations Coordinator, Human Resources
Loretta Encinas	Administrative Assistant, Office of Student Affairs
Stephen Felszeghy	Department Chair, Mechanical Engineering
Steven Garcia	Vice President, Administration and Finance
David J. Godoy	Assistant Vice President, Student Affairs
Anita Gonzalez	Administrative Support Assistant, Enrollment Services
Bruce Griffin	ITC Consultant, Administrative Technologies
Bob Hoffman	Operations Manger, Information Resource Management
Nancy Kudo-Hombo	Manager of Accounting and Administration, Academic Technology Support
Julie Hopkins	Administrative Support Assistant, Enrollment Services
Tim Ingersoll	Director, Data and Network Communications Information Resources Management
Rosa Jemenez	Department Secretary, Mechanical Engineering
Karen Johnson	Associate Dean, School of Health and Human Services
Larry Jordan	Director, Analytical Studies
Mary Kulick	Assistant Registrar for Records
Yuet Lee	University Internal Auditor
Anthony Longhetti	Acting Department Chair, Criminal Justice
Susan Mason	Acting Department Chair, Theatre Arts and Dance
Marcie Mora	Office Coordinator for Advisement, School of Natural and Social Sciences
Jesse Murillo	Department Secretary, Psychology
Diane Paramo	Director, Cashiering Services
Connie Porras	Department Secretary, Theatre Arts and Dance
Peter Quan	Associate Vice President for Information Resources Management
Jennifer Revvelta	Employee Relations Coordinator, Human Resources
Michael Roffe	Department Chair, Psychology
Trudy Sanders	Administrative Operations Analyst, School of Health and Human Services
Susan Thorn	Administrative Support Assistant, Enrollment Services
Andrew Winnick	Associate Vice President, Academic Affairs
Ron Witte	System Analyst, Information Resources Management
Joan Woosley	University Registrar

