

STUDENT RECORDS & REGISTRATION

CPSU SAN LUIS OBISPO

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ABBREVIATIONS

AACRAO	American Association of Collegiate Registrars and Admissions Officers
ASI	Associated Student Incorporated
CPSU	California State Polytechnic State University
CSU	California State University
EM	Executive Memorandum
ESS	Enrollment Support Services
EO	Executive Order
FERPA	Family Education Rights and Privacy Act
ITS	Information Technology Services
OUA	Office of the University Auditor
OAR	Office of Academic Records
PRCs	Permanent Record Cards
SCT	Systems & Computer Technology Corporation
SIS+	Student Information System Plus

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 (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; however, 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 CPSU San Luis Obispo campus is the responsibility of Enrollment Support Services (ESS). The Office of Academic Records (OAR) is supervised by a director, student records and registration, who reports to the associate vice president for ESS.

The automated system for student recordkeeping at CPSU San Luis Obispo is the Student Information System Plus (SIS+) from SCT Corporation, which runs on an IBM mainframe computer. Beginning in Fall 1987, student records data was entered in SIS+. Prior to Fall 1987, student records were maintained on permanent record cards.

Registration at the CPSU San Luis Obispo campus is predominantly accomplished by students through a telephone-based system – CAPTURE. Last year the campus introduced a web based registration system – POWER. Both POWER and CAPTURE are augmented to the extent necessary through a manual change of program process.

OPINION

We visited the campus from September 20, 1999 to October 29, 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. As described further in the report, we have reservations about the level of control over the process of students withdrawing from during the last three weeks of instruction. Additionally, improved controls over system access to update student records are necessary.

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 RECORDS POLICY ADMINISTRATION [6]

WRITTEN POLICY [6]

The campus policy outlining the various procedures by which they intend to ensure compliance with the provisions of the Family Education Rights and Privacy Act (FERPA) was not complete. Following an established student records policy decreases the risk of non-compliance with FERPA.

BIENNIAL REVIEWS [7]

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

GENERAL FUND REIMBURSEMENT [8]

General fund reimbursements for support services provided to ASI by campus administrative departments were not properly documented. Documenting general fund reimbursement procedures ensures that the general fund is fully reimbursed for costs associated with ASI.

GRADES [9]

GRADE/GRADE CHANGE CONTROLS [9]

Grades/grade change controls were lacking verification controls. Enforcing grading controls provides an additional measure of protection against possible student record inaccuracies.

WITHDRAWAL "W" DOCUMENTATION [10]

Documentation to support student withdrawals was inadequate. Maintaining proper documentation for student withdrawals decreases the risk of incomplete student records.

ANNUAL REPORTING [11]

The fairness board 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 the grade appeals process.

DATA CONTROL, SECURITY & INTEGRITY [12]

SYSTEM INTEGRITY [12]

SIS+ system integrity was compromised. Ensuring there is adequate system integrity decreases the exposure to unauthorized student record changes and FERPA violations.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDENT RECORDS POLICY ADMINISTRATION

WRITTEN POLICY

The campus policy outlining the various procedures by which they intend to ensure compliance with the provisions of the Family Education Rights and Privacy Act (FERPA) was not complete.

While the campus has developed a number of policies as outlined in E.O. 382, they did not cover all of the related provisions and the various pieces of the policy were not consolidated.

The statement should include items such as:

- ▶ the appropriateness of campus policy statement on the privacy of student records;
- ▶ the types of student records maintained, and the titles and addresses of the officials responsible for maintaining them;
- ▶ procedures for disclosing information to students and others with legitimate educational interests; and
- ▶ procedures for recordkeeping.

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 assistant director for the office of academic records indicated that they were not aware of the requirement for a campus policy on FERPA compliance. Additionally, the registrar indicated that a number of these areas are covered; however, this information is not consolidated into one centralized policy.

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

Recommendation 1

We recommend that the campus enhance formal written policies and procedures outlining how the campus intends to comply with FERPA requirements.

Campus Response

We concur. Over the past several years Cal Poly has expended considerable time and effort in establishing a University Policy on Use and Release of Student Information and in communicating with students, faculty and staff on an annual basis regarding FERPA requirements.

A University committee has been created to assist with the review of FERPA-related policies and procedures on an on-going basis. To more clearly comply with E.O. 382, the campus has amended the existing policy to include:

- A list of the types of student records maintained and the responsible officials
- Campus policy for reviewing and expunging student records
- The procedures for challenging the content of student records
- The cost of reproducing copies of student records

This policy is available to student from the Office of Academic Records and the Office of Judicial Affairs, the University's web site, and students will be made aware of its existence via the annual mailing to students. Anticipated Completion Date: Complete

BIENNIAL REVIEWS

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

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 practice concerning student records. It further states that:

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

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 assistant director for academic records indicated that they were not aware of the requirements to complete the biennial reviews.

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

Recommendation 2

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

Campus Response

We concur. Procedures have been established to review University information management practices concerning student records. Reviews will be done on a biennial basis, with the report forwarded to the University President. A report for 1998-99 will be completed by April 30, 2000 as the starting point for the review cycle. An annual reminder of this reporting requirement will be added to the departmental electronic calendar. Anticipated Completion Date: April 30, 2000

GENERAL FUND REIMBURSEMENT

General fund reimbursements for support services provided to ASI by campus administrative departments were not properly documented.

The development of the ASI student directory requires that the campus information technology services division create a student information database to be sent to the publisher. ASI receives an annual commission on the net sales of the advertiser published in the directory.

CSU memo BA 83-30, *Policy on Chargeable Services to Self-Supporting Operations*, dated December 28, 1983, policy attachment item 4 states that recovery for the cost of support shall be governed by existing specific CSU policies. If trade-offs are appropriate, they shall be clearly documented, valued in accordance with supportable cost studies, and otherwise not in conflict with state, system or campus regulations. Consensus should be reached between service provider and recipient as to the service levels and method of calculation. Support provided shall be in accordance with appropriate written agreements that include the basis and rationale for the valuation. The agreements should be on file in the campus business office and available for audit.

The associate vice president for administration indicated that no such document had been developed between the campus and ASI for services rendered.

Not documenting general fund reimbursement procedures could reduce working capital available to the campus as a result of the general fund not being fully compensated for support provided to ASI.

Recommendation 3

We recommend that the campus take the following actions:

- a. determine the amount of services provided to ASI by each campus service area provider, taking into consideration any specific CSU policy;
- b. prepare appropriate written agreements containing the basis and rationale for the valuation of services; and
- c. maintain the written agreements on file in the campus business office.

Campus Response

We concur. We will review the services provided to ASI by each campus service area provider and will prepare a written agreement based on the results of this review. Anticipated Date of Completion: August 1, 2000

GRADES

GRADE/GRADE CHANGE CONTROLS

Grades/grade change controls were lacking verification controls.

We noted the following:

- ▶ The campus grading procedures did not include a verification process back to the originating instructor for review.
- ▶ The campus was not utilizing a process of signature verification of department chairs and/or school deans for student record change forms received for processing.

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 (OAR).

According to the registrar, OAR does send verifications to the originating faculty. However, the associate vice president for ESS conducted a review and found that the documents were not being used, and the accuracy rate was close to 100%. In response, he discontinued the production of the verification reports. The registrar further stated that signature verification was an appropriate quality assurance process; however, OAR lacked the time and resources to complete this process.

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

Recommendation 4

We recommend that the campus:

- a. include a confirmation process which would return the recorded grades to the originating instructor for verification; and
- b. complete signature authorizations for department chairs and college deans and spot check student record change forms delivered for processing.

Campus Response

We concur.

- a. A confirmation process for grade rosters has been defined. Each year following winter quarter a random sample of grade rosters will be sent to faculty, along with a memo requesting their assistance in verifying the accuracy and integrity of the grade roster. To begin this verification sequence, this procedure was followed for grade rosters from summer 1999. The results showed 100% accuracy of the data as verified by faculty.
- b. We have created a signature reference file for department chairs, college deans and associate deans. A process has been defined which verifies a random sample of grade change forms on a monthly basis. We will continue to return a copy of the processed grade change forms to the instructor and the instructor's department as additional verification of authenticity.

Assistance has been requested from the Cal Poly's Statistics Department to determine the appropriate sample size for each verification process. Anticipated Date of Completion: Complete

WITHDRAWAL "W" DOCUMENTATION

Documentation supporting student withdrawals was inadequate.

We noted the following discrepancies with the 25 withdrawal files reviewed:

- ▶ An academic administrator appointed by the campus president was not approving course withdrawals that were completed during the last three weeks of the term. Twelve were noted.
- ▶ On two occasions, the reason for withdrawal had not been documented.
- ▶ One term withdrawal had not documented approval.
- ▶ On one occasion, the reason for withdrawal during the last three weeks of instruction was clearly not compelling enough to warrant approval.

Executive Order (EO) 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 the 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 registrar indicated that faculty are held to approve these withdrawal requests based upon legitimate reasons. However, there are occasions where they will approve some that are non-emergency. He indicated that, in this case, the student may have been subject to exemption based on testing and the results are sometimes not received until late in the quarter.

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

Recommendation 5

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

Campus Response

We concur. It is clear that current withdrawal policies and procedures need to be reviewed. A committee will be formed to review E.O. 268 along with campus policy to define documentation and approval requirements. A recommendation from the committee is expected by July 31, 2000. The campus community will then be notified of changes, withdrawal forms will be revised, and all documentation will be updated. Anticipated Date of Completion: July 31, 2000

ANNUAL REPORTING

The fairness board did not prepare and submit an annual report on grade appeals to the campus president and faculty senate/council as required. This is a repeat finding from a prior audit.

The campus fairness board had not completed the annual reports for 1996-97 and 1997-98.

Executive Order (E.O.) 320, Assignment of Grades and Grad 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.

The chair of the fairness board indicated that there had been some lapses in reporting, since a number of cases never make it to the board.

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

Recommendation 6

We recommend that the fairness board develop procedures to ensure that grade appeal reports are submitted as required.

Campus Response

Further investigation has revealed that the Fairness Board Annual Report had been filed for the two years under audit. The report had been filed with the Academic Senate and the Office of the President. The distribution of the annual report has been revised to include the Registrar. The Office of the Registrar will keep a file so that the documents are available for subsequent audits/reviews. Anticipated Date of Completion: Complete

DATA CONTROL, SECURITY & INTEGRITY

SYSTEM INTEGRITY

SIS+ system integrity was compromised.

Update capability was available to inquiry users on the SIS+ system registration screen (#104) for grading options.

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

The assistant director for OAR indicated that they were not sure why I was able to make changes to a student's record and that systems personnel was investigating this incident.

Not maintaining adequate system controls increases the risk of unauthorized access.

Recommendation 7

We recommend that the campus resolve the SIS+ system integrity issue and ensure that capability for updating records is limited to authorized personnel only.

Campus Response

Upon investigation of the system integrity issue, it was determined that it was a system-wide problem. The software vendor, SCT, has since issued a fix and the inappropriate update capability no longer exists in our system. To ensure integrity on SIS+ systems throughout the CSU, we have issued a letter to all of our SIS+ colleagues alerting them to this problem. Anticipated Date of Completion: Complete

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Warren Baker	President
Debbie Arseneau	Instructional Space & Scheduling Analyst, Instructional Planning & Analysis
George Beardsley	Professor, Economics
Michael Bernard	Coordinator, ITS-Computing Systems
Margaret Camuso	Administrative Analyst Specialist, Academic Senate
Marlene Carter	Associate Registrar, Office of Academic Records
Sharon Chan-Synder	Documentation Specialist, Human Resources & Employment Equity
Gil Coake	Department Chair, Architecture
David Conn	Associate Vice Provost, Academic Programs
Sherry Couture	Administrative Support Coordinator, Political Science
Jean Degnan	Administrative Support Coordinator, Agriculture Business
Gerald DeMers	Department Chair, Kinesiology
Jill DeMers	Administrative Support Specialist, Kinesiology
Bob Dignan	Director, Fiscal Services
Sydney Francis	Senior Data Control Technician, ITS Operations
Marcia Friedman	Assistant Director for Academic Records
Gladys Gregory	Clerical Assistant, Academic Senate
Richard Grise	Programmer Analyst, ITS
Joyce Hatatani	Manager, Human Resources and Employment Equity
Shirley Hendricks	Administrative Support Assistant, Agriculture Business
Sharon Ledbetter	Supervisor, Clerical Services School of Business
Lorlie Leetham	Interim Assistant Director, Accounts Management
Suzanne Leon	Administrative Assistant, Business Administration
Dianne Long	Department Chair, Political Science
Roxana Lopez	Administrative Analyst Specialist, Architecture
Andy McMeans	Data Manager, ITS-Support Applications
Carol Morris	Assistant Registrar Records, Office of Academic Records
Sue Olson	Administrative Support Assistant, Agriculture Business
Joseph Risser	Risk Manager
Stan Rosenfield	Assistant Director Payment Management, Fiscal Services
James Sena	Department Chair, Business Administration
Ken Scott	Department Chair, Agriculture Business
Vicki Stover	Associate Vice President for Administration
Patty Warnick-Wait	Assistant to Director of Academic Records
Lee Whitmire	Supervisor, Cashiering Services
Thomas Zuur	Registrar & Director of Academic Records