

STUDENT RECORDS AND REGISTRATION

**CALIFORNIA STATE UNIVERSITY,
LONG BEACH**

**Audit Report 08-39
November 20, 2008**

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ABBREVIATIONS

ASI	Associated Students, California State University, Long Beach
CMS	Common Management Systems
CSU	California State University
EO	Executive Order
ES	Enrollment Services
FERPA	Family Educational Rights and Privacy Act of 1974 (As Amended)
RD Grade	Report Delayed
SIMS/R	Student Information Management System/Relational
SRR	Student Records and Registration
W Grade	Withdrawals

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2005, the Board of Trustees, at its January 2008 meeting, directed that *Student Records and Registration* (SRR) be reviewed. SRR was last audited in 1999.

We visited the California State University, Long Beach campus from August 4, 2008, through August 29, 2008, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on SRR controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls of SRR in effect as of August 29, 2008, taken as a whole, were sufficient to meet the objectives stated below.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were satisfactory. Numbers in brackets [] refer to page numbers in the report.

GRADING/RECORD ACCURACY AND INTEGRITY [5]

The university grade appeals committee did not include student participation for 2006/07 or 2007/08. The campus did not timely replace the administrative grading symbol RD (Report Delayed) with a substantive grade. This is a repeat finding from the prior SRR audit. The campus did not consistently approve and document withdrawals in the last 20 percent of instruction.

INTRODUCTION

BACKGROUND

In recent years, the systems used for student records and registration in the California State University (CSU) have changed to accommodate implementation of Common Management Systems (CMS) and the suite of software from Oracle/PeopleSoft. One CMS application is Campus Solutions. The CSU implementation of Campus Solutions includes the following modules: Academic Advisement, Admissions, Campus Community, Financial Aid, Student Financials, and Student Records.

At the time of the audit, two CSU campuses (San Diego and San Francisco) were using a non-CMS legacy system for student records. This system is Student Information Management System/Relational (SIMS/R).

The Family Educational Rights and Privacy Act (FERPA) of 1974, which, as amended, governs the confidentiality and privacy of student educational records. FERPA covers all institutions that receive funding of any kind administered by the U.S. Department of Education including for example, federal student financial aid programs. Educational records are those records that are directly related to a student. Per 34 CFR 99.3 (Code of Federal Regulations), records are directly related if they are either personally identifiable or easily traceable to the student. FERPA divides student records into two distinct categories: directory information and non-directory or confidential information. Directory information is information contained in the educational records of a student that would not generally be considered harmful or an invasion of privacy if disclosed. FERPA covers records generated and held by many different campus offices including official academic records held by campus registrars. Generally, school officials with a legitimate educational interest can access student educational records otherwise disclosure or release of information is protected and institutions which do not comply with FERPA can have federal funding withheld.

The Office of the University Auditor last reviewed student records in 1999 and found that systemwide policies pertaining to incomplete grading, the withdrawal process, the approval of grading symbols, and other applicable areas were outdated and needed updating to provide clear guidance and direction to the campuses. In November 2001, the chancellor's office published Executive Order 792, *Grading Symbols, Assignment of Grades, and Grade Appeals* that established administrative grading symbols, minimum standards governing the assignment of grades, and provisions for appeal to ensure that the rights and responsibilities of faculty and students were properly recognized and protected. At the campuses, the registrar is typically the office responsible for registration and student records. At California State University, Long Beach, the registrar function is part of enrollment services (ES). The associate vice president of ES reports to the vice president of administration and finance.

PURPOSE

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Student Records and Registration*.

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

- ▶ Accountability for the registration and student records functions has been clearly defined and documented including delineation of roles and responsibilities, provisions for formulation of goals/objectives, and measurement of outcomes.
- ▶ Registration/student records' calendars, policies and procedures, and standard forms are current and comprehensive; and aligned with relevant federal and state laws/regulations and CSU directives.
- ▶ The registration process/system is equitable with advance registration priorities consistent with campus needs and minimization of opportunities for favoritism.
- ▶ The risks of registering ineligible students or students who later result in excessive disenrollments are reasonably mitigated in the registration process/system.
- ▶ Instructors of record are integrally involved in assigning grades and processing grade changes.
- ▶ Students have a reasonable opportunity to appeal arbitrary and capricious grades.
- ▶ Grades are changed only in accordance with campus authorizations.
- ▶ Excessive use of Report Delayed (RD) grades or RD grades not replaced as soon as possible adversely affects the accuracy of student records.
- ▶ Inadequately documented Incomplete (I) grades or I grades not converted within established time limits adversely affects the accuracy and integrity of student records.
- ▶ Withdrawals (W) grades after census date or in the last 20 percent of instruction without adequate justification adversely affect the accuracy and integrity of student records.
- ▶ The campus has adopted written FERPA policies and biennially reviews information management practices for student records.
- ▶ Access to automated systems is controlled and limited to authorized users; data backup procedures are in place; and physical security over system hardware is adequate.
- ▶ Dissemination of protected information from student records is adequately controlled.
- ▶ The campus has adequate measures to protect student records from destruction/loss and control the shredding of confidential source documents.

SCOPE AND METHODOLOGY

The proposed scope of audit, as presented in Attachment B, Agenda Item 2 of the January 22-23, 2008, meeting of the Committee on Audit, stated that *Student Records and Registration* includes review of database recordkeeping and registration systems, procedures for creating and changing records, and security measures protecting against unauthorized or inadvertent modification, removal, or destruction of records.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect from July 1, 2007, through June 30, 2008.

Specifically, we reviewed and tested:

- ▶ Application of registration priorities.
- ▶ Use of registration holds.
- ▶ Assignment of grades including various grading symbols such as RD and I.
- ▶ Disenrollments and extent of student withdrawals.
- ▶ Grade change authorizations.
- ▶ Grade appeal processes.
- ▶ FERPA policies and procedures.
- ▶ Limitations on access to student records.
- ▶ Disclosure of student records.
- ▶ Issuance of transcripts.
- ▶ Business continuity planning for student records.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GRADING/RECORD ACCURACY AND INTEGRITY

GRADE APPEALS COMMITTEE

The university grade appeals committee did not include student participation for 2006/07 or 2007/08.

Executive Order (EO) 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states in part that each campus shall implement policy and procedures covering the assignment of grades and grade appeals which include at least one or more committees for hearing grade appeals, which shall provide safeguards to assure due process for both student and instructor. Such committees shall include student membership. Student members shall not participate in assignment of grades.

The records manager stated that the president of the Associated Students, California State University, Long Beach (ASI) or the designee is normally the student representative on the committee and when committee meeting scheduling prevented the student from attending meetings, the committee did not timely ensure a replacement.

The absence of student participation on the grade appeals committee increases the risk that student rights are not properly recognized and protected.

Recommendation 1

We recommend that the campus fill the vacant student representative position on the grade appeals committee.

Campus Response

The campus concurs that student participation is important in the grade appeal process. The campus charge for this committee included student participation on the committee during the years audited. However, an actual student was not appointed to the committee by the ASI. The campus has already remedied this situation for the current year and the ASI has appointed a student to the committee. The Academic Senate has instituted procedures with the ASI to ensure timely appointment of a student to the committee each year. Corrective action on this issue is complete.

REPORT DELAYED GRADING SYMBOL

The campus did not timely replace the administrative grading symbol RD (Report Delayed) with a substantive grade. This is a repeat finding from the prior Student Records and Registration audit.

The campus used this grading symbol as a “place holder” for students enrolled in international studies abroad; however, the administrative grading symbol RD was not timely replaced. Specifically, 108 RD grades assigned between fall 2005 and summer 2007 had not been timely replaced with substantive grades.

TERM	RDs
Fall 2005	8
Spring 2006	7
Fall 2006	8
Spring 2007	23
Summer 2007	62
Total	108

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, 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.

The senior director of the Center for International Education stated that campus policies had not been updated to include proper procedures, guidelines, and restrictions for students participating in study abroad to ensure that a grade equivalent or transcripts were forwarded to the campus.

Not maintaining an effective campus control system for grading symbols increases the possibility of inaccuracies in student records.

Recommendation 2

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

Campus Response

The campus concurs that the timely replacement of the RD grade with a substantive grade for students who have studied abroad is important to support the progress to degree of these students. The campus has already implemented procedures that call for study abroad staff to maintain contact with students and foreign partner institutions during and just following the program abroad to ensure timely receipt of documents needed to replace the RD grade. All RD grades for study abroad will be changed to a substantial grade within six months of the end of the term at the host institution. Corrective action on this issue is complete.

WITHDRAWALS

The campus did not consistently approve and document withdrawals in the last 20 percent of instruction.

During our review, we noted the following:

- ▶ The appointed academic administrator or a designee did not approve medical withdrawals or withdrawals that occurred during the last 20 percent of instruction. None of the six requests for withdrawal in the last 20 percent of instruction tested included the approval of the appointed academic administrator or designee.
- ▶ Student reasons for withdrawal in the last 20 percent of instruction did not always represent an accident, serious illness, or other serious and compelling reasons, and did not appear in some cases to be beyond the student's control.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states in part that, "withdrawals shall not be permitted during the final 20 percent 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 practical." The EO goes on to state that requests for permission to withdraw under these circumstances shall be granted only with the approval of the instructor and the department chair and/or dean as described by campus policy and must also be approved by the academic administrator appointed by the president.

Academic Senate policy statement 02-02 states in part that, "withdrawals during the final three weeks of instruction are not permitted except in cases such as accident or serious illness where the circumstance causing the withdrawal are clearly beyond the student's control and the assignment of an Incomplete is not practical." Request for permission to withdraw under these circumstances must be made in writing on forms available in the office of admissions and records. The requests and approvals shall state the reasons for the withdrawal. These requests must be approved by the instructor, department chairperson, and dean of the school. Copies of such approvals are kept on file in the office of admissions and records.

The university may allow a student to withdraw without academic penalty from all classes if the following criteria are met:

- ▶ A completed medical withdrawal form, including any required documentation, is submitted to enrollment services before the end of the semester, and
- ▶ The student presents evidence to demonstrate that a severe medical or debilitating psychological condition prevented the student from attending and/or doing the required work of the courses to the extent that it was impossible to complete the courses. The provost (or designee) will review the evidence presented and, in consultation with appropriate medical or psychological

professionals as needed, determine whether the request for a medical withdrawal should be granted.

The vice provost of academic affairs stated that the campus had not prepared necessary delegation of authority or updated the campus policy to reflect current campus procedures.

Failure to ensure that withdrawals are in compliance with stated policies and are properly approved increases the risk that the accuracy and integrity of student records is negatively affected.

Recommendation 3

We recommend that the campus improve the documentation for withdrawals in the last 20 percent of instruction to include both an adequate justification of serious and compelling reasons and approval by an academic administrator so designated by the campus president.

Campus Response

The campus concurs that tighter review and control is needed during the last 20 percent of instruction to ensure the withdrawal is for serious and compelling reasons beyond the student's control and the assignment of an Incomplete is not practicable. The office of the provost and the office of enrollment services have modified the withdrawal petition form and process to reinforce the requirements of withdrawal during this period. All withdrawals during this period now require the approval of the vice provost or the associate vice president of undergraduate studies in addition to the instructor, department chair, and college dean. Corrective action on this issue is complete.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
F. King Alexander	President
Nancy Cohn	Records Manager, Enrollment Services (ES)
Debra Covey	Transcript Technician, ES
Linda Dixon	Office Manager, Mathematics
Jennifer Dizon	Document and Training Specialist, Academic Support
Tom Enders	Associate Vice President, ES
Jack Farrell	Director, Evaluations and Records
Laurinda Fuller	Senior Internal Auditor
Catherine Gotlieb	Business Continuity Specialist
Donna Green	Director of Academic Support and Student Relations
Nathan Jensen	Senior Director, Center for International Education
Mishelle Laws	Assistant Vice President, Quality Improvement
Cecile Lindsay	Vice Provost, Academic Affairs
Leah Nieto	Assistant Director of Academic Support
Shannon O'Connell	Management Support Specialist
Aysu Spruill	Director, Internal Auditing Services
Mary Stephens	Vice President, Administration and Finance
Loretta Young	Internal Auditing Analyst

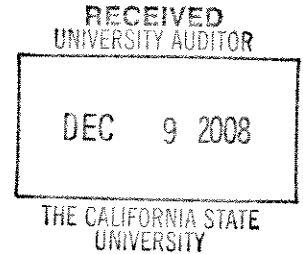


CALIFORNIA STATE UNIVERSITY, LONG BEACH

DIVISION OF ADMINISTRATION AND FINANCE

December 1, 2008

Mr. Larry Mandel
University Auditor
California State University
401 Golden Shore
Long Beach, California 90802



Re: Response to Student Records and Registration #08-39

Dear Larry:

Please find enclosed California State University, Long Beach's response to the above report. The campus is committed to addressing and resolving the issues identified in the audit report.

Please let me know if we can provide you with any additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Stephens".

Mary Stephens
Vice President for Administration and Finance

Enclosure

IA-0203

- c: F. King Alexander, President
Tom Enders, Associate Vice President, Enrollment Services
Ted Kadowaki, Associate Vice President, Budget and University Services
Cecile Lindsay, Vice Provost, Academic Affairs
Aysu Spruill, Director, Internal Auditing Services

STUDENT RECORDS AND REGISTRATION

CALIFORNIA STATE UNIVERSITY, LONG BEACH

Audit Report 08-39

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THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

December 15, 2008

CHANNEL ISLANDS

CHICO

MEMORANDUM

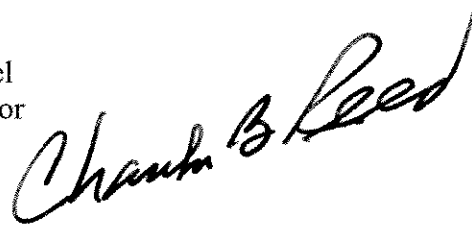
DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FROM: Charles B. Reed
Chancellor



FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 08-39 on *Student Records and Registration*,
California State University, Long Beach

LONG BEACH

LOS ANGELES

In response to your memorandum of December 15, 2008, I accept the response
as submitted with the draft final report on *Student Records and Registration*,
California State University, Long Beach.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/jt

POMONA

Enclosure

SACRAMENTO

cc: Dr. F. King Alexander, President
Ms. Mary Stephens, Vice President, Administration and Finance

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS