

STUDENT RECORDS AND REGISTRATION

**CALIFORNIA STATE UNIVERSITY,
SAN BERNARDINO**

**Audit Report 08-40
February 6, 2009**

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ABBREVIATIONS

CMS	Common Management Systems
CSU	California State University
EO	Executive Order
FERPA	Family Educational Rights and Privacy Act of 1974 (As Amended)
I Grade	Incompletes
IRT	Information Resources and Technology
ISO	International Standardization Organization
RD Grade	Report Delayed
RRE	Office of Records, Registration, and Evaluation
SAM	State Administrative Manual
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, San Bernardino campus from September 2, 2008, through October 3, 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 October 3, 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.

REGISTRATION [5]

Changes made to registration priorities were not routinely monitored.

GRADING/RECORD ACCURACY AND INTEGRITY [6]

The campus had not established procedures for certain important aspects of the grade change process. In addition, grade appeal cases were not reported annually to the president, and the campus did not appropriately assign or adequately document incomplete grades.

SECURITY OF STUDENT RECORDS [9]

Results of biennial reviews of information management practices were not forwarded to the president or to the chancellor. The campus had neither physically secured the computers hosting the document imaging system for student records nor stored backups off-site. In addition, the campus had original vital student records that were not stored in fireproof filing cabinets; and records, registration and evaluation did not have a business continuity plan specific to restoring its operations.

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 CSU San Bernardino, the registrar function is part of the office of records, registration, and evaluation (RRE) in the division of student affairs. The RRE director reports through the associate vice president of enrollment management to the vice president of student affairs.

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 for fiscal year 2007/08.

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

REGISTRATION

Changes made to registration priorities were not routinely monitored.

Our review disclosed that approximately 27 staff members assigned to three different offices/colleges were authorized to modify registration dates and times. The campus' automated system did not include a process that allowed management the opportunity to examine (i.e., track and review) changes made to registration priorities.

State Administrative Manual (SAM) §5300.3 requires state agencies to provide for the proper use and protection of its information assets.

SAM §5305.1 stipulates responsibility for each agency to define a cost-effective approach to managing risks associated with its information assets.

The records, registration, and evaluation (RRE) associate director stated that according to the director of administrative computing services/Common Management Systems (CMS), the campus was using a CMS delivered version of the registration page and audits were not enabled.

Not reviewing changes in registration priorities creates opportunities for staff to make unauthorized changes and unnecessarily exposes the campus to reputational risks when budget cutbacks in class section capacity and other factors make it increasingly more difficult for students with low registration priorities to get classes they need.

Recommendation 1

We recommend that the campus establish controls to better monitor registration priorities, including consideration for the use of the registration system to track and review changes.

Campus Response

The campus concurs with the recommendation. The access to update appointment dates/times has been limited, and appropriate management controls have been put in place. In addition, a request has been forwarded to the CMS central office through the modification governance process to evaluate the options available to campuses to monitor and track changes to appointment dates/times. The campus will consider options based on their analysis. No further action from the campus can be pursued until CMS central provides direction.

Completion Date: Completed February 24, 2009

GRADING/RECORD ACCURACY AND INTEGRITY

GRADE CHANGES

The campus had not established procedures for certain important aspects of the grade change process.

Based on tests performed, there were three areas of concern regarding grade changes:

- ▶ The grade change process required an instructor or a designee to submit the grade change form in person or through campus mail to the RRE office.
 - If the document was received through campus mail, RRE personnel were unable to verify that the document had not come into the possession of a student.
 - If the document was received in-person, the campus did not annotate the form to document that the RRE office recipient had verified the instructor's identity.
- ▶ The campus did not notify an instructor of record when a grade was changed through the automated student records system.

Government Code §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

The RRE associate director stated that the current grade change process including acceptance of grade changes through campus mail facilitated instructor submission.

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

Recommendation 2

We recommend that the campus:

- a. Discontinue the practice of accepting grade change forms for processing via campus mail.
- b. Document the identity of instructors or designees submitting grade change forms.
- c. Consider using the automated system to return changed grades to the originating instructor for verification.

Campus Response

The campus concurs with all of the recommendations and will implement the recommended changes.

Completion Date: April 30, 2009

GRADE APPEALS

Grade appeal cases were not reported annually to the president.

The provost/vice president of academic affairs oversees the campus process for grade appeals that specifically involves the student grievance committee, a standing committee of the university's faculty senate. Although the provost/vice president of academic affairs received the grade appeals report, the report was not addressed nor provided to the president.

Article 10, Section 14 of the campus *Student Academic Grievance Procedures*, approved by the president on September 27, 2007, states that the academic grievance panel annually shall report to the president of the university and to the faculty senate on the number of grade appeal hearings requested and the disposition of each case.

Executive Order (EO) 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 21, 2001, requires the campus to establish policies and procedures on grade appeals that provide for annual reporting to the president and faculty senate on the number of grade appeal cases and the disposition of cases heard.

The RRE associate director stated that the report was not provided directly to the president due to oversight.

Lack of appropriate grade appeal reporting could jeopardize protection of students against arbitrary and capricious grading and perpetuate an ineffective process.

Recommendation 3

We recommend that the campus make annual reports of grade appeals to the president.

Campus Response

The campus concurs with the recommendation. The annual report will be submitted to the president. This report is completed at the end of summer.

Completion Date: Completed March 2, 2009

INCOMPLETES

The campus did not appropriately assign or adequately document incomplete grades.

Our review disclosed that there were two areas of concern regarding incomplete grades:

- ▶ Six of ten incomplete grade contracts reviewed did not meet California State University (requirements. In three instances, the students did not complete a substantial portion of the course (two required attendance in a subsequent class, and one was to retake exams); and in three other instances, the reason for the incomplete was not documented.
- ▶ Eight of the ten incomplete grade contracts reviewed were not signed by the student.

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

- ▶ The incomplete symbol shall be used only when the faculty member concludes that a clearly identifiable portion of course requirements cannot be met within the academic term for unforeseen reasons. An incomplete grade shall not be assigned when it is necessary for the student to attend a major portion of the class when it is next offered. An incomplete grade is also prohibited where the normal practice requires extension of course requirements beyond the close of a term (e.g., thesis or project-type courses).
- ▶ The conditions for removal of the incomplete grade shall be reduced to writing by the instructor and given to the student with a copy placed on file with the appropriate campus officer until the incomplete grade is removed or the time limit for removal has passed.

Government Code §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

The RRE associate director stated that because the instructors now used online grading in PeopleSoft, they were able to assign incomplete grades before anyone else had the opportunity to review the required incomplete grade contract. She added that campus policy did not provide detailed instructions for the instructors regarding what was and was not permissible in accordance with EO 792.

Improper assignment and inadequate documentation of incompletes exposes the campus to misunderstandings on the validity of the grading process.

Recommendation 4

We recommend that the campus:

- a. Provide written guidance to instructors regarding the use of an incomplete grade contract.
- b. Establish a review process to verify incomplete grade contract compliance with EO 792.

Campus Response

The campus concurs with the recommendations and will work with the associate provost to ensure implementation.

Completion Date: September 30, 2009

SECURITY OF STUDENT RECORDS

STUDENT INFORMATION MANAGEMENT

Results of biennial reviews of information management practices were not forwarded to the president or to the chancellor.

EO 796, *Privacy and Personal Information Management Student Record Administration*, dated January 1, 2002, states that each campus shall adopt a written policy statement establishing procedures by which the campus intends to comply with the federal Family Educational Rights and Privacy Act (FERPA) of 1974 and this executive order. These procedures shall include a requirement to periodically review campus information management practices concerning student records at least every two years, or more often as the need arises. The results of these reviews shall be forwarded to the chancellor by the president and shall include any changes deemed necessary.

The campus FERPA policy incorporates EO 796 requirements and states that the vice president of student affairs is responsible for the report and forwarding the report and findings to the president's office. The president is responsible for providing the report to the chancellor's office.

The RRE director stated that the information management practices review was completed and the results were presented to the administrative council; however, the results were not forwarded to the president or the chancellor because the campus had overlooked the EO 796 requirement.

The absence of biennial review reporting increases the risk of inadequate student record information management practices.

Recommendation 5

We recommend that the campus forward the results of biennial reviews of information management practices to the president and the chancellor.

Campus Response

The campus concurs with this recommendation. The campus will formulate a timeline to complete the biennial review.

Completion Date: May 1, 2009

SERVER SECURITY

The campus had neither physically secured the computers hosting the document imaging system for student records nor stored backups off-site.

The Student Tracking Archive Retrieval Redirect System is a document imaging application and database used for management of confidential student records that is located in an RRE server room outside an interior office. During the audit, we observed that the door to the server room was unsecured when the interior office was unoccupied. In addition, although the imaging server was backed up weekly, the backups were not taken off-site.

SAM §5300.3 requires state agencies to provide for the proper use and protection of its information assets.

International Standardization Organization (ISO) standard 9.2.1 states that equipment should be cited or protected to reduce the risks from environmental threats and hazards, and opportunities for unauthorized access. Additionally, ISO standard 10.5.1 states that backups should be stored in a remote location a sufficient distance to escape from a disaster at the main site.

The RRE associate director stated that the logistics of the office being accessible only through the server room made it difficult for the staff to keep the server room secured at all times and plans for off-site storage of backups had been delayed due to other priorities.

Inadequate physical security of computers increases the risk of inappropriate access to confidential student records. The lack of off-site backups increases the risk that the campus will not be able to recover from a disaster.

Recommendation 6

We recommend that the campus secure the server room and expedite implementation of plans to store the backups off-site.

Campus Response

The campus concurs with this recommendation. Adequate security controls will be installed on the server room, and off-site backups will be implemented for critical applications.

Completion Date: September 30, 2009

VITAL RECORDS PROTECTION

The campus had original vital student records that were not stored in fireproof filing cabinets.

The security standards of the American Association of Collegiate Registrars and Admissions Officers state that permanent records kept in paper form should be stored in fireproof cabinets or vaults and should have a backup on another medium for security.

The RRE associate director stated that the department had been unable to fully implement its imaging process for the student records due to limited resources.

Failure to take adequate protective measures exposes the campus to the risk of loss of irreplaceable vital student records.

Recommendation 7

We recommend that the campus implement controls to adequately protect vital student records.

Campus Response

The campus concurs with the recommendation and will begin a process to eliminate the risk by digitizing the paper records. The process to render the paper records into digital form will require a great deal of labor and expense. The campus will begin the process immediately and will demonstrate and report progress according to the following timeline:

Project Milestones	Begin Date	Completion Date
Initial analysis	03/01/09	04/14/09
Contract negotiations	04/15/09	05/15/09
Vendor scheduling	05/16/09	06/01/09
Student Hires	06/02/09	06/15/09
Begin Scanning of documents	07/01/09	07/01/09
Progress Reporting - 20% Complete	07/31/09	07/31/09
Progress Reporting - 40% Complete	08/31/09	08/31/09
Progress Reporting - 60% Complete	09/30/09	09/30/09
Progress Reporting - 80% Complete	10/30/09	10/30/09
Progress Reporting - 100% Complete	11/30/09	11/30/09
Documented Completion	12/01/09	12/07/09
Document Off-site archival of records	12/08/09	12/08/09

Completion Date: December 8, 2009

BUSINESS CONTINUITY

RRE did not have a business continuity plan specific to restoring its operations.

The operations area of RRE relied on campus information resources and technology (IRT) for business continuity planning, and the IRT plan did not specifically address RRE nor broadly cover aspects of business continuity planning beyond information technology. The IRT plan was also limited by a notation that stated, "for PeopleSoft Human Resources, Finance, and Student Administration applications, IRT defers to the Unisys disaster recovery plan."

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that each campus shall develop a business continuity plan with common elements such as annual plan review and, as a minimum, biennial testing.

EO 1014, *California State University Business Continuity Program*, dated October 8, 2007, states that each business unit that is determined by the university to provide essential functions shall develop a business continuity plan that reflects sufficient forethought and detail to ensure a high probability of successful maintenance or restoration of essential functions following an unfavorable event.

ISO standard 14.1 states that a business continuity management process should integrate information technology with other factors such as operations, staffing, materials, transport, and facilities.

Both the RRE director and RRE associate director stated that the IRT disaster recovery and business continuity plan were sufficient.

Inadequate business continuity planning and testing increases the risk of ineffective preparedness and loss of essential services.

Recommendation 8

We recommend that the campus establish a RRE business continuity plan.

Campus Response

The campus concurs with this recommendation. The campus will formulate a business continuity project team and develop a plan and framework to assess business continuity. A business continuity plan will be developed to address the most critical system applications.

Completion Date: September 30, 2009

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Albert K. Karnig	President
Laura Carrizales	Information Security Analyst
Nadine Chavez	Director, Educational Opportunity Program
Mary Chouinard	Associate Director, Records, Registration and Evaluation (RRE)
Victoria Coffey	Lead Program Assistant, Program Advising Worksheet for Students
Khalil Daneshvar	Staff Analyst/Programmer, Enrollment Services Technical Support
David DeMauro	Vice President, Administration and Finance (At time of review)
Lorraine Frost	Associate Vice President, Information Resources and Technology
Sunny Lin	Analyst/Programmer, Administrative Computing Services
Bob McGowan	Associate Vice President, Enrollment Services
Lydia Ortega	Director, (RRE)
Linda Pella-Hartley	Executive Assistant to Vice President, Administration and Finance
Arlene Reed	Acting Associate Director of Admissions and Operation
Frank Rincon	Vice President, Student Affairs
Shasta Sardet	Administrative Support Assistant
Craig Schott	Administrative Support Assistant, Educational Opportunity Program
Carl Shiinoki	Information Technology Consultant, Administration and Finance - Technical Services
Charlie Tabbut	Director, Administrative Computing Services/ Common Management Systems
Sherry Toman	Manager, Student Accounts Office
Lenora Venturina	Student Affairs, Analyst/Programmer

State of California

California State University, San Bernardino
5500 University Parkway
San Bernardino, California 92407-2397

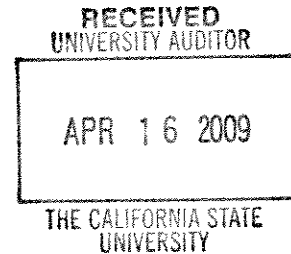
MEMORANDUM

DATE: April 16, 2009

TO: Larry Mandel
University Auditor
The California State University

FROM: Bob Gardner, Vice President
for Administration and Finance

SUBJECT: **Campus Response to
Student Records and Registrations Audit – Report No. 08-40
California State University, San Bernardino**



Enclosed is the campus response to CSUSB's *Student Records and Registration Audit – Report No. 08-40*.

Please contact me with any questions you may have. Thank you.

c: Al Karnig
Frank Rincon
Robert McGowan
Spencer Freund
Lorraine Frost
Mary Chouinard
Lydia Ortega

Enclosure

STUDENT RECORDS AND REGISTRATION

CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO

Audit Report 08-40

REGISTRATION

Recommendation 1

We recommend that the campus establish controls to better monitor registration priorities, including consideration for the use of the registration system to track and review changes.

Campus Response

The campus concurs with the recommendation. The access to update appointment dates/times has been limited and appropriate management controls have been put in place. In addition, a request has been forwarded to the CMS Central Office through the Modification Governance process to evaluate the options available to campuses to monitor and track changes to appointment dates/times. The campus will consider options based on their analysis. No further action from the campus can be pursued until CMS Central provides direction.

Completion Date: Completed February 24, 2009

GRADING/RECORD ACCURACY AND INTEGRITY

GRADE CHANGES

Recommendation 2

We recommend that the campus:

- a. Discontinue the practice of accepting grade change forms for processing via campus mail.
- b. Document the identity of instructors or designees submitting grade change forms.
- c. Consider using the automated system to return changed grades to the originating instructor for verification.

Campus Response

The campus concurs with all of the recommendations and will implement the recommended changes.

Completion Date: April 30, 2009

GRADE APPEALS

Recommendation 3

We recommend that the campus make annual reports of grade appeals to the president.

Campus Response

The campus concurs with the recommendations. The annual report will be submitted to the president. This report is completed at the end of summer.

Completion Date: Completed March 2, 2009

INCOMPLETES

Recommendation 4

We recommend that the campus:

- a. Provide written guidance to instructors regarding the use an incomplete grade contract.
- b. Establish a review process to verify incomplete grade contract compliance with EO 792.

Campus Response

The campus concurs with the recommendations and will work with the the Associate Provost to ensure implementation.

Completion Date: September 30, 2009

SECURITY OF STUDENT RECORDS

STUDENT INFORMATION MANAGEMENT

Recommendation 5

We recommend that the campus forward the results of biennial reviews of information management practices to the president and the chancellor.

Campus Response

The campus concurs with this recommendation. The campus will formulate a time line to complete the biennial review.

Completion Date: May 1, 2009

SERVER SECURITY

Recommendation 6

We recommend that the campus secure the server room and expedite implementation of plans to store the backups off-site.

Campus Response

The campus concurs with this recommendation. Adequate security controls will be installed on the server room and off-site backups will be implemented for critical applications.

Completion Date: September 30, 2009

VITAL RECORDS PROTECTION

Recommendation 7

We recommend that the campus implement controls to adequately protect vital student records.

Campus Response

The campus concurs with the recommendation and will begin a process to eliminate the risk by digitizing the paper records. The process to render the paper records into digital form will require a great deal of labor and expense. The campus will begin the process immediately and will demonstrate and report progress according to the following timeline:

Project Milestones	Begin Date	Completion Date
Initial analysis	03/01/09	04/14/09
Contract negotiations	04/15/09	05/15/09
Vendor scheduling	05/16/09	06/01/09
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Progress Reporting - 20% Complete	07/31/09	07/31/09
Progress Reporting - 40% Complete	08/31/09	08/31/09
Progress Reporting - 60% Complete	09/30/09	09/30/09
Progress Reporting - 80% Complete	10/30/09	10/30/09
Progress Reporting - 100% Complete	11/30/09	11/30/09
Documented Completion	12/01/09	12/07/09
Document Off-site archival of records	12/08/09	12/08/09

Completion Date: December 8, 2009

BUSINESS CONTINUITY

Recommendation 8

We recommend that the campus establish a RRE business continuity plan.

Campus Response

The campus concurs with this recommendation. The campus will formulate a business continuity project team and develop a plan and framework to assess business continuity. A business continuity plan will be developed to address the most critical system applications.

Completion Date: September 30, 2009



THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

April 23, 2009

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 08-40 on *Student Records and Registration*,
California State University, San Bernardino

LONG BEACH

LOS ANGELES

In response to your memorandum of April 23, 2009, I accept the response as submitted with the draft final report on *Student Records and Registration*, California State University, San Bernardino.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

Enclosure

SACRAMENTO

c: Dr. Albert K. Karnig, President
Mr. Bob Gardner, Vice President, Administration and Finance

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS