

STUDENT RECORDS AND REGISTRATION

**CALIFORNIA STATE UNIVERSITY,
SAN MARCOS**

**Audit Report 08-43
April 27, 2009**

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ABBREVIATIONS

ASI	Associated Students, Incorporated
AY	Academic Year
CMS	Common Management System
CSU	California State University
EMS	Enrollment Management Services
EO	Executive Order
FERPA	Family Educational Rights and Privacy Act of 1974 (As Amended)
I Grade	Incompletes
RD Grade	Report Delayed
SAM	State Administrative Manual
SIMS/R	Student Information Management System/Relational
SRR	Student Records and Registration
W Grade	Withdrawals

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.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

REGISTRATION PROCESS

Changes made to registration priorities were not routinely monitored.

Our review disclosed that approximately 12 staff members assigned to admissions and the registrar/records offices were authorized to modify registration priorities (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 registrar stated that the campus did not regularly monitor changes to students' registration priority because staff members were not required to seek approval prior to making changes to students' registration priority.

Failure to properly monitor changes to 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 changes made to registration priorities, including potentially using the registration system to track and review changes.

Campus Response

We concur. The following change shall be implemented to establish controls to better monitor changes made to registration priorities, including potentially using the registration system to track and review changes:

- To tighten controls, requests from students will be forwarded to the director for review and decision (in the director's absence, the associate vice president of enrollment management services (EMS) will render a decision).
- Upon approval from the director or associate vice president of EMS, the only records and registration staff who have access to change registration appointments shall be: (1) registration coordinator; (2) assistant director; (3) evaluator I, registration and records subject matter expert.

Action to change the registration priority will be forwarded first to the registration coordinator for processing and communication to student. In her absence, the other staff shall make the change in the system.

- The registration coordinator will maintain a log of all requests, decision, original registration appointment, new appointment, reason for the change, and date correction or change made in the system.

Anticipated Completion Date: July 17, 2009

GRADING/RECORD ACCURACY AND INTEGRITY

GRADE APPEALS COMMITTEE

The campus did not ensure appropriate student membership and documented participation on the grade appeals committee.

The campus was unable to provide a complete roster of all grade appeal committee members for the current and previous academic year. However, email documentation obtained by the registrar from Associated Students, Incorporated (ASI) indicated that there was one student assigned for academic year (AY) 2008/09, one student for AY 2007/08, and none for both AY 2006/07 and AY 2005/06. Student committee members were assembled only in the event of a grade appeal, but there was no documented evidence that they were appointed members of the committee.

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.

California State University, San Marcos policy, *Student Grade Appeals*, approved September 2, 2004, states, in part, that student membership of the Student Grade Appeals Committee shall consist of three students (two undergraduate, one graduate) and three student alternates to be named under procedures established by ASI. Students serving on this committee must be regular students in good standing, as determined under the same regulations imposed for ASI council members.

The registrar stated that due diligence regarding student membership and documented participation on the grade appeals committee had not been exercised in compliance with the EO and campus policy.

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

Recommendation 2

We recommend that the campus ensure appropriate student membership and adequately document student participation on the grade appeals committee.

Campus Response

We concur. The campus shall ensure appropriate student membership and adequately document student participation on the grade appeals committee by working with ASI to have student representatives named and recorded. A policy update will be approved by the Academic Senate to simplify the process by only requiring the appointment of student alternates as they are needed.

Anticipated Completion Date: July 17, 2009

REPORT DELAYED GRADING SYMBOL

The administrative grading symbol RD (Report Delayed) was not timely replaced with a substantive grade nor were faculty and department chairs notified in a timely manner.

We found that 166 RD grades had not been replaced with substantive grades as of the date of our review:

TERM	RDs
Spring 2005	2
Spring 2006	37
Summer 2006	7
Fall 2006	5
Spring 2007	13
Summer 2007	34
Fall 2007	19
Spring 2008	49
Total	166

Additionally, there was no evidence of notification to both the instructor of record and the department chair within one week of the assignment of the RD grade by the registrar.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states that 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 registrar shall notify both the instructor of record and the department chair within one week of the assignment of RD grades.

The registrar stated that periodic reviews of outstanding RD grades and notification of faculty and chairs had not been performed in a timely manner due to the lack of an established campus process.

Inadequate administration over grading symbols increases the possibility of inaccurate student records.

Recommendation 3

We recommend that the campus ensure that RD grades are timely replaced with a substantive grade and that faculty and department chairs are notified within one week of the assignment of RD grades.

Campus Response

We concur. The campus shall develop a written internal procedure to ensure that department chairs and faculty are notified within one week of the assignment of RD grades.

Anticipated Completion Date: July 17, 2009

INCOMPLETES

The campus had not developed policies and procedures to address the administration of incomplete grades and extensions.

We found that:

- ▶ Incomplete grade agreements and/or authorized extensions had not been documented for 11 students reviewed.
- ▶ Incomplete grades were not timely converted to failing grades when, or if, work was not completed as agreed.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states that the conditions for removal of the incomplete 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 is removed or the time limit for removal has passed. The EO also states that an incomplete shall be converted to the appropriate grade or symbol within one year following the end of the term during which it was assigned; however, an extension of the one-year time limit may be granted by petition for contingencies. If the incomplete is not converted within the prescribed time limit, or any extension thereof, it shall be counted as a failing grade.

The registrar stated that the records and registration office did not monitor incomplete agreements or extensions, as it is the responsibility of academic departments, colleges, or other appropriate campus offices to administer this process.

The absence of written policies and procedures for the administration of incomplete grades and extensions exposes the campus to misunderstandings on the validity of the grading process.

Recommendation 4

We recommend that the campus develop written policies and procedures to address the administration of incomplete grades and extensions.

Campus Response

We concur. The campus shall develop written policies and procedures, and forms to address the administration of incomplete grades and extensions. Our intention is to have all old incomplete grades reconciled.

Anticipated Completion Date: July 17, 2009

WITHDRAWALS

Withdrawal justifications were not consistently documented nor approved after census date and in the last 20 percent of instruction.

We found that:

- ▶ The campus had not documented or otherwise communicated its definition of serious and compelling reasons where withdrawal is acceptable due to circumstances beyond the student's control (such as accident or serious illness). As a result, the campus practice lacked consistency in applying this prerequisite.
- ▶ In 14 of 15 instances where withdrawals occurred between census and the final 20 percent of instruction, there was no documented evidence of a serious and compelling reason for withdrawal.
- ▶ In 6 of 12 instances, there was either no documentation or questionable evidence of accident or serious illness, where the cause of withdrawal was due to circumstances clearly beyond the student's control.
- ▶ Documentation was not maintained to evidence that requests for withdrawal during the final 20 percent of instruction were reviewed or approved by the academic administrator in addition to the department chair and/or dean described by the campus and appointed by the president.
- ▶ An academic administrator had not been appointed to review and approve withdrawals in the last 20 percent of the term.

EO 792, *Grading Symbols, Assignment of Grades, and Grade Appeals*, dated November 12, 2001, states, in part, that withdrawals after the census date and prior to the last 20 percent of instruction may be assigned only for serious and compelling reasons. Permission to withdraw during this time shall be granted only with the approval of the instructor and the department chair and/or dean as described by campus policy. 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. 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.

The registrar stated that the campus did not appoint an academic administrator to review and approve withdrawals in the last 20 percent of the term because departments had not reached a consensus on the requirements for approval of, or the definition of, serious and compelling reasons for withdrawal.

The lack of adequate documentation and approval of withdrawals adversely affect the accuracy and integrity of student records.

Recommendation 5

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

Campus Response

We concur. The campus shall improve the documentation for withdrawals after census date and in the last 20 percent of instruction to include both an adequate justification of serious and compelling reasons by developing written policies and implementing them. This shall include approval by an academic administrator designated by the campus president.

Anticipated Completion Date: July 17, 2009

SECURITY OF STUDENT RECORDS

STUDENT INFORMATION MANAGEMENT

Biennial reviews of information management practices concerning student records were not documented nor were results reported to the chancellor's office.

We found that campus procedures to ensure compliance with the Family Educational Rights and Privacy Act (FERPA) of 1974 included a requirement to periodically review student information management practices at least every two years, but the campus could not provide evidence of these reviews or that results were reported to the chancellor's office.

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 FERPA 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 registrar stated that the biennial reviews were not documented nor reported to the chancellor's office due to oversight.

The absence of biennial reviews increases the risk of inappropriate distribution of student records.

Recommendation 6

We recommend that the campus document biennial reviews of information management practices concerning student records and report the results to the chancellor's office.

Campus Response

We concur. The dean of students, as designated by the vice president for student affairs, will ensure reporting personnel are reminded of the expectations outlined in EO 796 and campus policy. This reminder notification shall be sent annually each summer to ensure effective preparation for the following year and the biennial review.

Anticipated Completion Date: July 17, 2009

SYSTEM ACCESS AND EXTRACTION OF PROTECTED DATA

Periodic reviews of user access to reports and other extractions within all systems and applications containing protected data were not performed.

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 registrar stated that due to the recent implementation of PeopleSoft, user access to reports or other data extractions had not been monitored.

The lack of periodic reviews of user access to systems and applications containing protected data increases the risk of improper use of information assets.

Recommendation 7

We recommend that the campus perform periodic reviews of user access to reports and other extractions within all systems and applications containing protected data.

Campus Response

We concur. Biannual reviews will be completed of user access to reports and extraction of data to ensure their access is appropriate based on their current position with the university. Additionally, the campus will continue to work with Common Management Systems (CMS) Central towards improving the capability to track reporting activities. Within the CMS student system, there is no way to track on a user basis who has run reports or exported data from the system. This issue has been reported to CMS Central at the chancellor's office.

Anticipated Completion Date: July 17, 2009

BUSINESS CONTINUITY

The office of the registrar had not developed a comprehensive business continuity plan to address student records and registration.

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, at 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.

International Standards Organization 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.

The registrar stated that due to other priorities, a business continuity plan for student records and registration had not been developed.

The absence of a business continuity plan increases the risk of ineffective preparedness and loss of essential services.

Recommendation 8

We recommend that the campus develop and maintain a comprehensive business continuity plan to address student records and registration.

Campus Response

We concur. The campus shall work with our emergency management department to develop a business continuity plan addressing student records and registration.

Anticipated Completion Date: July 17, 2009

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Karen S. Haynes	President
Evelyn Andrews	Director of Registration and Records/Registrar
David Barsky	Associate Vice President, Academic Programs
Candace Bebee	Assistant to Vice President, Finance and Administrative Services
Darren Bush	Associate Vice President, Enrollment Management Services
Jim Carr	Lead, Materials Management
James Garrison	Director of Operations, Enrollment Management Services
April Grommo	Director, Information Technology Project Office
Linda Hawk	Vice President, Finance and Administrative Services
Teresa Macklin	Information Security Officer
Dean Manship	Manager, Emergency Management - University Police
Jeffrey Marks	Research Analyst, Institutional Planning and Analysis
Janice Plemons	Risk Analyst and Workers' Compensation Coordinator
Katy Rees	Director, Strategic Planning and Administrative Services
Patricia Worden	Vice President for Student Affairs



Office of the Vice President, Finance and Administrative Services

Linda Hawk
Vice President

RECEIVED
UNIVERSITY AUDITOR

JUN 10 2009

THE CALIFORNIA STATE
UNIVERSITY

California State University San Marcos
San Marcos, California 92096-0001 USA

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lhawk@csusm.edu
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June 9, 2009

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

Subject: Campus Response to Audit Report 08-43
California State University San Marcos Student Records and Registration Audit

Dear Mr. Mandel:

Enclosed is our campus response to the eight recommendations in Audit Report 08-43, Student Records and Registration. We anticipate sending our supporting evidence by July 17, 2009.

Please let us know if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Linda Hawk".

Linda Hawk
Vice President
Finance and Administrative Services

Enclosures

cc: President Karen S. Haynes
Emily Cutrer, Provost and Vice President, Academic Affairs
Patricia Worden, Vice President, Student Affairs

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STUDENT RECORDS AND REGISTRATION

CALIFORNIA STATE UNIVERSITY, SAN MARCOS

Audit Report 08-43

REGISTRATION PROCESS

Recommendation 1

We recommend that the campus establish controls to better monitor changes made to registration priorities, including potentially using the registration system to track and review changes.

Campus Response

We concur. The following change shall be implemented to establish controls to better monitor changes made to registration priorities including potentially using the registration system to track and review changes:

1. To tighten controls, requests from students will be forwarded to the Director for review and decision (in the Director's absence, the AVP of EMS will render a decision);
2. Upon approval from the Director or Associate VP of EMS, the only Records and Registration staff who have access to change registration appointments shall be: (1) Registration Coordinator; (2) Assistant Director; (3) Evaluator I/R&R Subject Matter Expert. Action to change the registration priority will be forwarded first to the Registration Coordinator for processing and communication to student. In her absence, the other staff shall make the change in the system.
3. The Registration Coordinator will maintain a log of all requests, decision, original registration appointment, new appointment, reason for the change, and date correction or change made in the system.

Anticipated Completion Date: July 17, 2009

GRADING/RECORD ACCURACY AND INTEGRITY

GRADE APPEALS COMMITTEE

Recommendation 2

We recommend that the campus ensure appropriate student membership and adequately document student participation on the grade appeals committee.

Campus Response

We concur. The campus shall ensure appropriate student membership and adequately document student participation on the grade appeals committee by working with Associated Students Incorporated (ASI) to have student representatives named and recorded. A policy updated will be approved by the Academic Senate to simplify the process by only requiring the appointment of student alternates as they are needed.

Ancitipated Completion Date: July 17, 2009

REPORT DELAYED GRADING SYMBOL

Recommendation 3

We recommend that the campus ensure that RD grades are timely replaced with a substantive grade and that faculty and department chairs are notified within one week of the assignment of RD grades.

Campus Response

We concur. The campus shall develop a written internal procedure to ensure that department chairs and faculty are notified within one week of the assignment of RD grades.

Ancitipated Completion Date: July 17, 2009

INCOMPLETES

Recommendation 4

We recommend that the campus develop written policies and procedures to address the administration of incomplete grades and extensions.

Campus Response

We concur. The campus shall develop written policies and procedures, and forms to address the administration of incomplete grades and extensions. Our intention is to have all old Incomplete grades reconciled.

Ancitipated Completion Date: July 17, 2009

WITHDRAWALS

Recommendation 5

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

Campus Response

We concur. The campus shall improve the documentation for withdrawals after census date and in the last 20 percent of instruction to include both an adequate justification of serious and compelling reasons by developing written policies and implementing them. This shall include approval by an academic administrator designated by the campus president.

Ancitipated Completion Date: July 17, 2009

SECURITY OF STUDENT RECORDS

STUDENT INFORMATION MANAGEMENT

Recommendation 6

We recommend that the campus document biennial reviews of information management practices concerning student records and report the results to the chancellor's office.

Campus Response

We concur. The Dean of Students, as designated by the Vice President for Student Affairs, will ensure reporting personnel are reminded of the expectations outlined in EO 796 and campus policy. This reminder notification shall be sent annually each summer to ensure effective preparation for the following year and the biennial review.

Ancitipated Completion Date: July 17, 2009

SYSTEM ACCESS AND EXTRACTION OF PROTECTED DATA

Recommendation 7

We recommend that the campus perform periodic reviews of user access to reports and other extractions within all systems and applications containing protected data.

Campus Response

We concur. Bi-annual reviews will be completed of users access to reports and extraction of data to ensure their access is appropriate based on their current position with the university.

Additionally, the campus will continue to work with CMS Central towards improving the capability to track reporting activities. Within the CMS student system there is no way to track on a user basis who has run reports or exported data from the system. This issue has been reported to CMS Central at the Chancellor's Office.

Ancitipated Completion Date: July 17, 2009

BUSINESS CONTINUITY

Recommendation 8

We recommend that the campus develop and maintain a comprehensive business continuity plan to address student records and registration.

Campus Response

We concur. The campus shall work with our Emergency Management department to develop a business continuity plan addressing student records and registration.

Anticipated Completion Date: July 17, 2009


THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

June 19, 2009

CHANNEL ISLANDS

CHICO

DOMINGUEZ HILLS

MEMORANDUM

EAST BAY

FRESNO

TO: Mr. Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report 08-43 on *Student Records and Registration*,
California State University, San Marcos

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of June 19, 2009, I accept the response as submitted with the draft final report on *Student Records and Registration*, California State University, San Marcos.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/ms

SACRAMENTO

Enclosure

SAN BERNARDINO

c: Ms. Linda Hawk, Vice President, Finance and Administrative Services
Dr. Karen S. Haynes, President

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS

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