



AUDITOR GENERAL
William O. Monroe, CPA



STATE UNIVERSITIES AND COMMUNITY COLLEGES
STUDENT RECORDS SYSTEMS
OPERATIONAL AUDIT
For the Spring and Fall 2000 Terms

SUMMARY

Finding No. 1: Within the last two years, the student records systems for many institutions have not been audited or reviewed by the institutions.

Finding No. 2: There is a wide disparity among the institutions regarding the retention period for transcript release authorization forms. The retention periods range from one month to indefinitely. As a result, numerous instances were noted in which the release of official transcripts was not documented as being approved by an authorized individual.

Finding No. 3: We noted several inconsistencies and weaknesses in the control processes over grade changes as summarized below:

- ◆ ***Grade changes were not always documented by the signature of the respective authorized institution representative, contained questionable signatures, and were made without evidence that the course grade changes were communicated to the instructor who taught the course prior to the change being made.***
- ◆ ***Institutions had not adopted specific time frames to consider grade changes, or the time periods adopted appeared excessive in that it extended at least two terms beyond the term in***

which the grades were awarded. Also, grade changes were made after degrees were conferred.

- ◆ ***Five institutions did not maintain a grade change history file, while those institutions that did maintain a history file had not consistently utilized those files to conduct periodic analytical reviews of grade changes.***
- ◆ ***Four institutions did not retain grade change forms on a permanent basis.***

INTRODUCTION

During the audit period, the 10 universities (institutions) were part of the State University System and, accordingly, were governed, regulated, and coordinated by the former Board of Regents, subject to the general supervision of the State Board of Education. The 28 community colleges (institutions) of the Florida Community College System are under the general direction and control of the Florida Department of Education, Division of Community Colleges, and are governed by law and rules of the State Board of Education. A separate district board of trustees governs and operates each community college.

For institutions of higher education, the accuracy, safeguarding, and integrity of student records systems (including transcripts, diplomas, and grades) are a high priority, as these systems represent the end

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result of the educational process. The integrity of each institution depends on the processes in place to ensure the accuracy of the student records systems. Without clearly defined and consistently applied records retention time periods, mandatory history of grade changes and established time frames for grade change requests, and controls over issuing transcripts and diplomas, the possibility exists that unauthorized, improper, or incomplete transactions may occur. Student records systems vary among institutions; however, in general, the systems include student transcripts generated from instructor grade reports, subsequently authorized grade changes, and the issuance of a diploma conferring a degree to the graduate. Students must meet specific criteria to qualify for a diploma, and the transcripts become the documentation to support the awarding of the diploma and the conferred degree. Students utilize the diplomas and transcripts to continue their education and to substantiate completion of the required course work to be employed in a chosen profession. The institutions are responsible for administering the student records systems and maintaining the history and integrity of the resultant student records.

SCOPE, OBJECTIVES, AND METHODOLOGY

This operational audit focused on the administration of the student records systems by the 10 universities of the State University System and the 28 community colleges of the Florida Community College System for the Spring and Fall 2000 Terms. The objectives of this audit were to determine the extent to which Florida's public universities and community colleges had implemented procedures to administer the student records systems in accordance with the governing laws, administrative rules, and other guidelines. Specifically, we reviewed management controls and administration over issuing transcripts and diplomas, recording final grades to student records, and subsequent changes to student records. We

conducted this audit in accordance with applicable standards contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

FINDINGS AND RECOMMENDATIONS

Finding No. 1: Internal Audits or Management Reviews

The inspectors general at the ten universities perform internal audits, reviews, and management advisory services based on annual work plans. These work plans are established by conducting risk assessments of various aspects of university operations and programs. Upon doing their risk assessments, the inspectors general generally consider the risk for improperly issuing transcripts, grade changes, or diplomas. As a result, over the last two fiscal years, the Florida Gulf Coast University conducted an audit of student records and some of the other university inspectors general have conducted reviews or investigations of portions of the student records systems at the request of university management. The Florida Gulf Coast University internal audit of the student records system reported deficiencies similar to those presented in this report.

With the exceptions of Miami-Dade and Valencia Community Colleges, the community colleges do not have inspectors general or internal audit staff. Any reviews of college operations or programs are normally contracted out to independent certified public accounting firms or conducted by college administrative staff. Florida Community College at Jacksonville, Gulf Coast, Okaloosa-Walton, and Valencia Community Colleges have performed some form of review of the student records within the last two years; however, the remaining community colleges have not.

Internal audits or management reviews conducted by community college and university personnel are an effective control in providing information to

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management that could be used to make improvements in student records system processes. We recommend that the community colleges, similarly to that of the universities, periodically include the student records systems processes within the institutions' internal audit or review plans.

Responses

The Division of Community Colleges concur that internal audits or management reviews are an effective control and indicate that Division staff will work with the colleges to implement periodic reviews or audits.

Finding No. 2: Release of Official Transcripts

Section 228.093(3)(d), Florida Statutes, provides that no institution of higher education shall permit the release of student records without the written consent of the student or the student's parent or guardian, if the student is under 18 years of age. The institutions have developed transcript release forms, which must be completed and signed, requesting the release of transcripts. However, there is a wide disparity among the institutions regarding the retention period for the release authorization forms. The retention periods ranged from one month to indefinitely. The former Board of Regents and the Division of Community Colleges have not provided guidance on establishing retention time frames for transcript release authorization forms.

Section 257.36(6), Florida Statutes, provides that a public record may be destroyed or otherwise disposed of only in accordance with retention schedules established by the Division of Library and Information Services of the Department of State (Division). The Division has issued a variety of detailed instructions and schedules describing the various time frames that public records should be retained. Although requests for release of transcript forms are not specifically included on these schedules, similar student record documents must be retained by institutions for five years after graduation, transfer, or

withdrawal, provided applicable audits of the institutions have been released.

In the absence of a standard retention schedule for the transcript release forms, we used the five-year time frame provided by the Division of Library and Information Services as the recommended retention schedule. Our review disclosed that 28 of 38 institutions retained requests for release of transcript forms less than five years, as shown in the following chart:

Institutions Retaining Transcript Release Forms Less Than Five Years	
Institution	Retention Period
Florida Agricultural and Mechanical University	3 Years
Florida Atlantic University	1 Year
Florida Gulf Coast University	1 Year
Florida International University	3 Months
University of Florida	3 Months
University of North Florida	3 Months
University of South Florida	1 Year
University of West Florida	1 Year
Brevard Community College	1 Year
Broward Community College	3 Months
Central Florida Community College	6 Months
Daytona Beach Community College	3 Years
Edison Community College	3 Months
Florida Community College at Jacksonville	1 Month
Florida Keys Community College	1 Year
Gulf Coast Community College	1 Year
Hillsborough Community College	6 Months
Indian River Community College	6 Months
Manatee Community College	1 Year
Miami-Dade Community College	4 Months
North Florida Community College	1 Year
Okaloosa-Walton Community College	1 Year
Palm Beach Community College	1 Year
Polk Community College	1 Month
St. Petersburg College	4 Months
Santa Fe Community College	3 Years
Seminole Community College	3 Months
Tallahassee Community College	2 Months

As a result of the short retention periods, our tests (generally 30 released transcripts at each institution) for the Spring and Fall 2000 Terms disclosed numerous instances in which requests could not be located. For those transcript release forms located, we noted instances in which the transcript release forms were not signed. The institutions and its

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reasons for the occurrences are shown in the following chart:

Unlocated or Unsigned Transcript Release Forms by Institution			
Institution	Type of Occurrence		
	(1)	(2)	(3)
Florida International University	17		
University of Florida	30		
University of North Florida	28		
Brevard Community College			3
Central Florida Community College	15		1
Daytona Beach Community College			3
Edison Community College	13		
Florida Community College at Jacksonville	30		
Florida Keys Community College	6		
Indian River Community College	3		
Lake City Community College			1
Lake-Sumter Community College			1
Manatee Community College			13
Miami-Dade Community College	16		
Okaloosa-Walton Community College	5		
Palm Beach Community College		12	1
Pasco-Hernando Community College			3
Polk Community College	7		
St. Petersburg College	9	1	
Santa Fe Community College	5	2	2
Seminole Community College	30		
Tallahassee Community College	30		

Types of Occurrences:
 (1) Transcript release form not within the institution's retention period, therefore not available.
 (2) Transcript release form within the institutions retention period, but not located.
 (3) Transcript release form not signed.

Because of the volume of requests for transcripts received by the institutions, it may not be practicable to retain the release request forms for five years. However, because student records and reports are confidential and exempt from public access pursuant to Section 228.093(3)(d), Florida Statutes, we recommend that the institutions and the Divisions of Colleges and Universities and Community Colleges, in consultation with the Division of Library and Information Services, develop a consistent retention period. Also, transcripts should only be released with an appropriately signed release authorization form.

Responses

The Division of Colleges and Universities responded that while most of the universities disagree with the

five-year time frame suggested by the Auditor General, they generally agree to the development of a consistent retention period and will work with the appropriate parties to develop a consistent retention period.

The Division of Community Colleges indicated that most of the colleges feel the five-year retention period is excessive. Most agree that hard copies should be maintained for one year or indefinitely, if electronically. The colleges agree to work with appropriate parties in developing a consistent retention period. Most exceptions noted in the chart result in the colleges accepting electronic requests for transcripts.

Finding No. 3: Grade Change Requests

In an institution of higher education, transcript and grade integrity is a high priority. Without a complete history of grade changes, periodic analytical reviews of grade changes, evidence of instructor and other institutional personnel authorization, and established time frames for grade change requests, the possibility exists for grade changes to be made without management's knowledge and authorization. We noted, as follows, several inconsistencies and exceptions to the control processes over official grade changes that should be addressed by the respective institutions.

- At seven institutions, one grade change was not documented by the signature of authorized institution personnel, 17 grade change forms were not available to verify that the grade changes were communicated to the instructor and to verify the authorized institution personnel signatures, and one signature was determined by the institution to be a forgery. The following chart summarizes these findings:

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Unsigned and/or Unverified Grade Change Requests by Institutions	
Institution	Number of Occurrences
Florida Agricultural and Mechanical University (1)	1
University of Florida	1
University of West Florida	1
Lake-Sumter Community College	3
Polk Community College	8
St. Petersburg College	4
Santa Fe Community College	1

(1) One grade change form contained a questionable signature of a University employee. Upon investigation by the University, it was determined that the authorizing signature was forged. The University determined eight additional instances of grade changes based on forged signatures for the student. The University determined that these changes were inappropriate and have subsequently changed the student's grades back to the original grades issued by the instructors, frozen the student's transcript, and, as of June 2001, is pursuing additional administrative sanctions against the student.

The institutions' explanations for the above occurrences were generally that the forms could not be located, the error was due to administrative oversight, or the signatures on the form were forged. To ensure the integrity of student grades, we recommend that the institutions improve procedures to ensure instructor approval and authorized institution personnel signatures are received prior to student grades being changed.

Responses

The Division of Colleges and Universities responded that FAMU has implemented new procedures and the other two universities will continue to monitor their procedures.

The Division of Community Colleges responded that most of the exceptions resulted from the forms not being located or were outside of the colleges' retention period. The Division will work with the colleges to address this issue.

- ◆ We noted that 29 institutions had not adopted specific time frames to consider grade changes

(other than "incomplete"), or the time periods adopted appeared to be excessive in that it extended at least two terms beyond the term in which the grade was awarded. These institutions are listed in the following chart:

Institutions With No or Excessive Time Frames for Grade Changes	
Institution	Time Frame (1)
Florida Agricultural and Mechanical University	1
Florida Atlantic University	2
Florida International University	1
University of Florida	1
University of Central Florida	2
University of North Florida	2
University of South Florida	1
University of West Florida	1
Brevard Community College	1
Broward Community College	1
Central Florida Community College	1
Edison Community College	1
Florida Keys Community College	1
Gulf Coast Community College	1
Hillsborough Community College	2
Indian River Community College	1
Lake City Community College	1
Lake-Sumter Community College	1
Manatee Community College	2
Miami-Dade Community College	1
Pasco-Hernando Community College	1
Pensacola Junior College	1
Polk Community College	1
St. Johns River Community College	3
St. Petersburg College	2
Santa Fe Community College	1
South Florida Community College	1
Tallahassee Community College	2
Valencia Community College	3

Note (1) Time Frame:
 1 - No specific time frame
 2 - One year or longer through appeal
 3 - Two years or longer through appeal

At 13 institutions, we noted 27 grade changes that were made after the term immediately following the term in which the grades were assigned. Also, at 8 institutions, we noted 16 grade changes that were made after degrees were conferred. These occurrences are listed in the following chart:

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Untimely Grade Changes by Institution		
Institution	Type of Occurrence	
	(1)	(2)
Florida Agricultural and Mechanical University	5	
Florida Gulf Coast University	3	8
Florida International University		2
University of Central Florida		1
University of Florida	1	1
University of West Florida	1	
Daytona Beach Community College	3	1
Lake-Sumter Community College	1	
Miami-Dade Community College	3	
North Florida Community College		1
Pasco-Hernando Community College	1	
Polk Community College	4	1
St. Petersburg College	1	1
Santa Fe Community College	1	
Seminole Community College	2	
South Florida Community College	1	

Type of Occurrences:
 (1) Grades were changed after the term immediately following the term in which the grade was assigned.
 (2) Grades were changed after the degree was conferred.

The institutions' explanations for these occurrences were generally that no time restriction existed on grade changes, or there was an administrative override of the institution's policy. Failure to restrict the time frames in which grades may be changed increases the risk of unauthorized changes. For example, as we reported in the Unsigned Grade Change Request chart, nine grade changes at Florida Agricultural and Mechanical University were determined to be inappropriate. These changes were made two years after the original grades were awarded. To ensure that student transcripts are currently maintained, and to reduce the possibility of errors, we recommend that the institutions reduce the time period in which grades may be changed.

Responses

The Division of Colleges and Universities responded that grade change policy is developed and approved

by faculty, and any changes need to be approved by the faculty. Also, several universities believe their policy adequately restricts the time frame to consider grade changes, while other universities acknowledge the need to consider revisions to their policy.

The Division of Community Colleges indicated that 19 colleges agree with the finding. Two colleges feel that there should be no time limit on grade changes for correcting errors. The Division believes this is a local issue to be addressed by each of the college's board of trustees, but will work with the 28 colleges to ensure that they have policies adopted to address the timeliness of grade changes.

- At five institutions, a grade change history file was not available to document grade changes, limiting our review as to the appropriateness of grade changes. These institutions were Florida Keys, Hillsborough, Lake-Sumter, North Florida, and St. Johns River Community Colleges. Additionally, at the institutions that do maintain a grade change history file, we noted that the history file was not consistently used to conduct periodic analytical reviews of grade changes. Such reviews could disclose various trends and unusual fluctuations that may require further investigation by the institution. We recommend that each institution maintain a grade history file that can be used to perform periodic reviews of grade changes to ensure that the instructor or other appropriate institution personnel properly approves any grade changes.

Responses

The Division of Colleges and Universities responded that the universities would consider using the grade history file to conduct periodic analytical reviews of grade changes. The Division also indicated that a few universities currently perform some type of limited review.

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The Division of Community Colleges responded that it would work with the colleges to ensure that procedures are adopted to address periodic analytical review of grade change history files.

- At four institutions, grade change forms were retained from one semester to ten years, as shown in the following table, while grade changes were maintained on a permanent basis at 34 institutions:

Institutions With Grade Change Form Retention Periods Less Than Permanent	Retention Period
University of Florida	10 Years
Polk Community College	1 Semester
St. Petersburg College	1 Semester
Tallahassee Community College	3 Years

The Division of Library and Information Services' General Records Schedule for Universities and Community Colleges describes student transcripts as a record series consisting of the official student record documenting courses taken, grades received and degrees awarded, requiring for a permanent retention period of such records. Inasmuch as grade changes document grades received, and support the authorization of a changed grade on a student transcript, it would appear that such documents are part of the record series for student transcripts consisting of the same retention period. We recommend that these institutions revise the grade change form retention period to a permanent period to agree with the General Records Schedule for Universities and Community Colleges.

Responses

The Division of Colleges and Universities responded that the University of Florida maintains its grade change forms in a microfilm, microfiche, or optical imaging system and that it has not submitted grade changes as part of its record destruction procedure.

The Division of Community Colleges stated that two of the colleges agree that the grade change retention period should be permanent. The other college stated that it maintains its record in definitely in electronic format, but not in hard copy format. Again, the Division feels that this is a local issue, but will work with the colleges to ensure policies and procedures are adopted.

Finding No. 4: Recommended Statutory Revision

Section 228.093(3)(d), Florida Statutes, provides that no institution of higher education shall permit the release of student records without the written consent of the student or the student's parent or guardian. Historically, in practice, written consent for the release of student records has been generally accepted to be a document containing the signature of the requesting party. However, institutions receive electronic communications from students requesting various student records. As technology continues to advance, the ability for institutions and students to communicate through this media advances, and as such, legislation concerning the authorization and release of student records should keep pace with that technology within the confines of legislative intent and guidance. As the majority of institutions have electronic data interchange, internet, and web application capabilities, and many students have similar capabilities, the Legislature may wish to clarify the definition of written consent for the release of transcripts within this provision of law.

Responses

The Division of Community Colleges agree that clarification of what is actually required for the release of student transcripts would be appropriate and have joined with the universities in reviewing this statute as part of the activities of the Family Education Rights and Privacy Act.

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AUTHORITY

Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.



William O. Monroe, CPA

Auditor General

AUDITEE RESPONSE

In letters dated August 31 and September 27, 2001, the Division of Colleges and Universities and Division of Community Colleges, respectively, generally concurred with our audit findings. For a more comprehensive understanding of the Divisions' responses to the findings and recommendations contained in this report, please see the Auditor General's Web site, where each response may be viewed in its entirety.

To promote accountability in government and improvement in government operations, the Auditor General makes operational audits of selected programs, activities, and functions of universities and community colleges. This operational audit was made in accordance with applicable **Government Auditing Standards** issued by the Comptroller General of the United States. This audit was coordinated by Denis Jessen, CPA, and supervised by Karen Collington, CPA. Please address inquiries regarding this report to Jim Raulerson, CPA, Audit Manager, via e-mail at jimraulerson@aud.state.fl.us or by telephone at **(850) 487-4468**.

This report, as well as other audit reports prepared by the Auditor General, can be obtained on our Web site (<http://www.state.fl.us/audgen>) by telephone at **(850) 487-9024**; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.



STATE UNIVERSITY SYSTEM OF FLORIDA
325 West Gaines Street, Tallahassee, Florida 32399-1950

August 31, 2001

Mr. William O. Monroe, CPA
Auditor General
Office of the Auditor General
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Mr. Monroe:

Please find attached the responses to the preliminary and tentative findings and recommendations for the operational audit of Student Records Systems for the State Universities.

Should you have any questions or require additional information, please do not hesitate to call me.

Sincerely,

C. W. Blackwell
Carl W. Blackwell
Interim Chancellor

CWB/kac

Attachment

AN EQUAL ACCESS/OPPORTUNITY—AFFIRMATIVE ACTION SYSTEM

University of Florida • Florida State University • Florida A&M University • University of South Florida • Florida Atlantic University
Gainesville Tallahassee Tallahassee Tampa Boca Raton
University of West Florida • University of Central Florida • Florida International University • University of North Florida • Florida Gulf Coast University
Pensacola Orlando Miami Jacksonville Ft. Myers

**Division of Colleges and Universities
Operational Audit of Student Records Systems
Response to Audit**

Finding No. 2: Release of Official Transcripts

Recommendation: We recommend that the institutions and the Divisions of Colleges and Universities and Community Colleges, in consultation with the Division of Library and Information Services, develop a consistent retention period. Also, transcripts should only be released with an appropriately signed release authorization form.

Response: Several of the universities currently adhere to the retention guidelines established by the American Association of Collegiate Registrars and Admissions Officers, which is one year for transcript requests. These universities generally do not see the need or benefit of retaining the release forms longer than one year, especially since they maintain electronic systems for tracking the requests. One university, which had a three-month retention period, has already adopted a five-year retention schedule. Another university with a three-month retention period considers the request forms as data entry documents that are used to enter and document transcript requests in their automated system.

While most of the universities disagree with the five-year time frame suggested by the Auditor General, they generally agree to the development of a consistent retention period. Therefore, the Division of Colleges and Universities, in consultation with the Division of Library and Information Services, will work with the Division of Community Colleges and the institutions to develop a consistent retention period.

Finding No. 3: Grade Change Requests

Recommendation: To ensure the integrity of student grades, we recommend that the institutions improve procedures to ensure instructor approval and authorized institution personnel signatures are received prior to student grades being changed.

Response: Florida A & M University has implemented new procedures to ensure that the affixed signatures are that of the authorized institutional personnel prior to students' grades being changed. The other two universities cited in this finding will continue to monitor their procedures for compliance with current policy.

Recommendation: To ensure that student transcripts are currently maintained, and to reduce the possibility of errors, we recommend that the institutions reduce the time period in which grades may be changed.

Response: The universities generally responded that their grade change policy is developed and approved by the university faculty. Therefore, any changes concerning time frames to consider grade changes will need to be discussed and approved by the faculty and/or Provost. Several of the universities believe their current policy adequately restricts the time frame to consider grade changes, but acknowledge that their policy allows for exceptions when special circumstances arise. One university considers its current policy to be vague, and would be supportive of a policy that sets specific time frames for grade changes. The two universities reported as having the most occurrences of untimely grade changes plan to revise their grade change procedures.

Recommendation: We recommend that each institution maintain a grade history file that can be used to perform periodic reviews of grade changes to ensure that the instructor or other appropriate institution personnel properly approves any grade changes.

Response: As noted in the audit report, all ten of the universities currently maintain a grade history file. The universities generally indicated that they would consider using the grade history file to conduct periodic analytical reviews of grade changes. A few of the universities indicated that they already perform some type of periodic review. The Division of Colleges and Universities will encourage all of the universities to conduct periodic analytical reviews of grade changes.

Recommendation: We recommend that these institutions revise the grade change form retention period to a permanent period to agree with the General Records Schedule for Universities and Community Colleges.

Response: The University of Florida was the only university reported for not permanently retaining grade change forms. The University responded as follows: "The University of Florida maintains all grade change forms in either a microfilm, microfiche, or optical imaging system. While the record retention schedule for the active student file folder allows for a 10-year retention period following the last term of attendance, we have not submitted grade changes as part of our record destruction procedure. Currently, grade changes, along with all other documents generated during the course of a student's attendance, are maintained on an optical imaging system which will allow us to selectively destroy documents following the 10-year retention period. Grade changes will not be part of that selective destruction process."

FLORIDA COMMUNITY COLLEGE SYSTEM

PUTTING MINDS TO WORK

J. David Armstrong, Jr.
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September 26, 2001

Mr. William O. Monroe
Auditor General
State of Florida
G 74 Claude Pepper Building
111 West Gaines Street
Tallahassee, Florida 32399-1450

Dear Mr. Monroe:

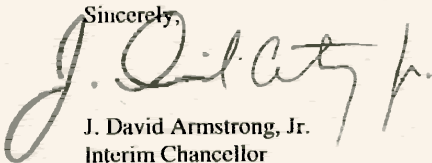
Enclosed is my response to your preliminary and tentative findings and recommendations which may be included in a report to be prepared on the following:

State Universities and Community Colleges
Student Records Systems
Operational Audit
For the Spring and Fall 2000 Terms

An electronic version of my response has been transmitted to Mr. Jim Raulerson, Audit Manager.

If you have any questions or require additional information, please feel free to contact me or Gary Yancey at 488-7926, extension 126. Thank you.

Sincerely,



J. David Armstrong, Jr.
Interim Chancellor

JDA/cml

Enclosure

c: Mr. Edward L. Cisek
Mr. Gary Yancey
Mr. Syd McKenzie
Ms. Carolyn A. McGriff

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Finding No. 1: Internal Audits or Management Reviews

This finding noted that the student records systems for 24 of the 28 community colleges have not been audited or reviewed by community college management or internal auditors within the last two years. The colleges and the Division of Community Colleges concur that internal audits or management reviews conducted by institution personnel are an effective control in providing information to management that could be used to make improvements in student records system processes. Division staff will follow-up with the colleges to ensure that procedures are implemented for periodic reviews or audits of the student records systems.

Finding No. 2: Release of Official Transcripts

The first part of this finding relates to the retention period for transcript release forms. In the absence of a standard retention schedule for transcript release forms, your auditors used a five-year time frame provided by the Division of Library and Information Services for similar student records as the recommended retention schedule for transcript release forms. However, the colleges generally follow the recommended one-year retention schedule published by the American Association of College Registrars and Admissions Officers (AACRAO), the national professional organization. Several colleges also noted that they maintain requests in an electronic format indefinitely.

Most of the colleges feel that a retention period of five years is excessive. They generally agree that hard copies of these forms should be maintained for one year or that they may be retained indefinitely electronically. The colleges will strengthen procedures, as needed, to ensure that student records and reports remain confidential and exempt from public access pursuant to Section 228.093(3)(d), Florida Statutes. The colleges concur with your recommendation that the institutions and the Divisions of Colleges and Universities and Community Colleges, in consultation with the Division of Library and Information Services, develop a consistent retention period. Accordingly, the Division of Community Colleges will work with the 28 community colleges, the Division of Colleges and Universities, and the Division of Library and Information Services to develop a consistent retention period.

The second part of this finding relates to unlocated or unsigned transcript release forms. Most of the exceptions to the signed transcript release forms for community colleges were the result of the colleges accepting electronic requests for transcripts. The issue of electronic transcript requests is addressed further in our response to Finding No. 4.

Finding No. 3: Grade Change Requests

This finding is comprised of 5 parts:

Unsigned and/or unverified grade change requests;

Specific timeframes not adopted to consider grade changes (other than “incomplete”), or time periods adopted that appeared to be excessive in that they extended at least two terms beyond the term in which the grade was awarded;

Untimely grade changes by the colleges. These changes were made either after the term immediately following the term in which the grade was assigned, or after the degree was conferred;

Grade change history files not available to document grade changes, or grade change history files not used to conduct periodic analytical reviews of grade changes;

Grade change form retention periods that are less than permanent.

Unsigned and/or unverified grade change requests:

Although this finding was titled “unsigned and/or unverified” grade change request forms, the exceptions for community colleges were solely related to forms not being located. St. Petersburg College pointed out that the four occurrences noted were the result of your sample including change requests that were outside the college’s established retention period. The Division of Community Colleges will work with the colleges to ensure that they all have procedures that address this issue.

Timeframe not adopted or excessive timeframes to consider grade changes:

Nineteen of the twenty-one community colleges noted as not having adopting specific timeframes, or as having adopted time periods that appeared to be excessive, agreed with your recommendation that a specific timeframe should be established. St. Petersburg College stated that, where there are errors in grades, there should not be a time limit for correcting the error. Lake City Community College believes that instructors should have the right to change any grade given at any time. The Division of Community Colleges believes that this is a local issue that should be addressed by each college’s Board of Trustees.

Untimely grade changes

Given your previous finding that more than half of the colleges did not have established timeframes for limiting grade changes, and that another six institutions had policies that allowed grade changes one year or longer after it was awarded, it is not surprising that you also found 28 instances at 10 different institutions in which grade changes were made beyond the term immediately following the awarding of the grade. St. Petersburg College again stated that where there are errors in grades, there should not be a time limit for correcting the error. The Division of Community Colleges believes that grade change policy is a local board issue. However, we will work with the 28 institutions to ensure that they have policies adopted to address this issue.

Grade change history file

As noted in your finding, most of the colleges maintain grade change history files. In those cases where such files are not maintained or where they are maintained but not used to conduct periodic analytical reviews of grade changes, the colleges generally agree that an analytical review should be performed. The Division of Community Colleges will work with the colleges to ensure that they have procedures that address periodic analytical reviews of grade change history files.

Grade change form retention periods

Two of the three colleges identified as having grade change form retention periods that were less than permanent, agreed that they should maintain records on a permanent basis. St. Petersburg College stated that they maintain their records indefinitely in electronic format. Again, the Division of Community Colleges believes that the retention period for grade change forms is a local issue, however we will work with the colleges to ensure that they adopt policies and procedures related to grade change form retention.

Finding No. 4: Recommended Statutory Revision

Several colleges requested the Auditor General's Office to expand its definition of an "authorized signature" to include electronic transcript requests with the use of personal identification numbers (PINs) in lieu of actual signatures. We agree that clarification of what is actually required for the release of a student's transcript would be appropriate. We have joined with the university system in reviewing this statute as part of the activities of the Family Education Rights and Privacy Act (FERPA) Subgroup of the School Code Workgroup currently reviewing all educational statutes. This group has the responsibility of suggesting statutory revisions to the Florida Board of Education for their recommendation to the Legislature to bring current law into compliance with the new K-20 organizational structure and Federal reporting requirements.

In summary, the colleges generally concur that transcript and grade integrity is a high priority and that every effort should be taken to ensure that the integrity remains intact.