

FINANCIAL AID
SONOMA STATE UNIVERSITY

Audit Report 10-40
October 28, 2010

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ABBREVIATIONS

Blue Book	The U.S. Department of Education, <i>Accounting, Recordkeeping, and Reporting by Postsecondary Educational Institutions for Federally Funded Student Financial Aid Programs</i>
CFR	Code of Federal Regulations
CMS	Common Management System
CPS	Central Processing Service
CSU	California State University
EO	Executive Order
EOP	Educational Opportunity Program
FERPA	Family Education Rights and Privacy Act of 1974
FSA	Federal Student (Financial) Aid
GC	Government Code
HEA	Higher Education Act
HSU	Humboldt State University
Imaging system	Singularity document imaging system
OUA	Office of the University Auditor
PS	PeopleSoft
SAM	State Administrative Manual
Secretary	Secretary of Education
TEACH	Teacher Education Assistance for College and Higher Educations

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last two quarters of 2009, the Board of Trustees, at its January 2010 meeting, directed that *Financial Aid* be reviewed. *Financial Aid* was previously audited in 2002.

We visited the Sonoma State University campus from March 22, 2010, through May 6, 2010, 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 financial aid activities. 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 for financial aid activities in effect as of May 6, 2010, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report.

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 found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

GENERAL ENVIRONMENT [6]

The campus did not have formal policies and procedures documented to address the assignment of appropriate roles and responsibilities for various key financial aid operational areas. Procedures had not been developed to ensure that required consumer disclosures are made using appropriate delivery methods. The procedures used to monitor the PeopleSoft (PS) user access privileges for the scholarship coordinator were not formally documented. Administration of the Singularity document imaging system (imaging system) used to archive Family Education Rights and Privacy Act of 1974 (FERPA) protected federal student (financial) aid documents needed improvement. For example, a risk assessment had not been performed that directly addressed the security vulnerabilities, loss potentials, and loss probabilities of the imaging system.

FISCAL AND PROGRAM OVERSIGHT AND COORDINATION [10]

Procedures to ensure against the overcommitment of FSA funds had not been formally documented.

INTRODUCTION

BACKGROUND

Financial aid programs provide support for students to help meet the costs of obtaining a college education. The federal government, state governments, colleges and schools, and a variety of other public and private sources provide funding for financial aid programs. There are two main categories of financial aid, differentiated primarily by the basis upon which they are awarded, as follows:

Achievement-based aid is awarded to students who have a special characteristic, skill, talent, or ability. Typically, achievement-based aid is in the form of scholarships.

Need-based aid is provided to students who demonstrate financial need. Most financial aid, particularly publicly funded aid, is awarded on the basis of financial need determined through the application process and in accordance with a prescribed federal formula.

Financial aid is available in four basic types of programs as follows:

Scholarships are “gift aid” that do not have to be repaid. Scholarships typically include criteria such as academic performance or special talents.

Grants are “gift aid” and generally do not include criteria other than financial need.

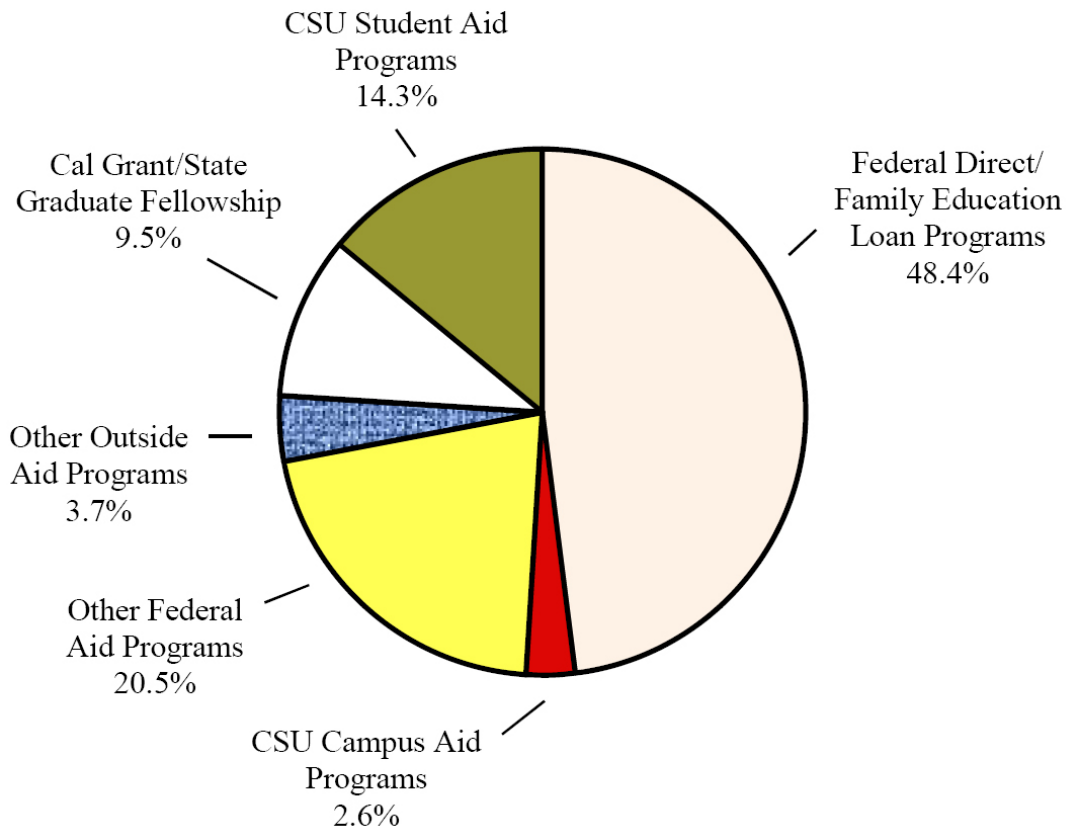
Work-study is a “self-help” program in the form of part-time employment during the student’s college career.

Loans are a form of “self-help” since they represent borrowed money that must be paid back over a period of time, typically after the student leaves school.

Federal financial aid programs provide almost 69 percent of the funding currently available for student financial aid. On an annual basis, federal financial aid programs are audited as part of the California State University (CSU) Single Audit as required by the Office of Management and Budget Circular A-133. As of June 30, 2009, the student financial assistance cluster in the Single Audit Report by KPMG included:

PROGRAM	AMOUNT
Federal Supplemental Educational Opportunity Grants	\$11,400,683
Federal Family Educational Loans	\$636,997,465
Federal Work Study	\$15,596,904
Federal Perkins Loan – Federal Capital Contributions	\$15,778,922
Federal Pell Grants	\$423,149,456
Federal (William Ford) Direct Loans	\$498,770,599
Academic Competitiveness Grants	\$12,410,868
National Science and Mathematics Grants	\$7,196,104
TEACH Grants, Nursing Loans, and Disadvantaged Student Loans	\$653,568
Total Student Financial Assistance	\$1,621,954,569

Non-federal financial aid programs include mainly those funded by the state through the California Student Aid Commission, programs administered by the CSU, and campus-administered funds. The state administers Cal Grants and certain loan assumption programs, and the CSU provides need-based assistance through state university grants and educational opportunity program grants. Certain other funds, such as local scholarships, are available through the campuses. In the CSU Statistical Abstract for fiscal year 2007/08, financial aid funds by source are graphically represented as follows:



For financial aid purposes, campuses establish standard student budgets or cost of attendance allowances that vary depending on where a student lives during the academic year (e.g., at home with parents or relatives, in university or campus housing such as residence halls, or off-campus in an apartment or other housing). Costs include fees and tuition, books and supplies, meals and housing, transportation, and other miscellaneous personal expenses. Students who are not classified as residents of the State of California must also pay non-resident tuition. Allowances for expenses, other than tuition and fees, are based largely on statewide survey data about the average expenses of students in California and information on the local or regional costs in the area served by particular campuses.

Beginning in calendar year 2010, the Office of the University Auditor (OAU) audit risk assessment methodology changed, based on a fiscal year 2009/10 systemwide risk assessment. Using the new procedure, the OAU worked with CSU campus executive management to identify high-risk areas in each campus. As a result of this change in risk assessment, financial aid was identified as an area for review.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to financial aid and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the audit objective, specific goals included determining whether:

- ▶ Campuses are administratively capable with regard to financial aid.
- ▶ Campuses have undertaken or completed initiatives to improve financial aid operations, maximize financial aid resources, and ensure compliance with federal regulatory requirements.
- ▶ Adequate consumer information on financial aid has been disclosed.
- ▶ Provisions have been made for securing financial aid data from inappropriate disclosures.
- ▶ Financial aid is supported by adequate automated recordkeeping systems.
- ▶ There is complete, correct, and consistent information circulated on financial aid.
- ▶ Other campus offices adequately coordinate with the financial aid office.
- ▶ Campuses avoid overcommitment or underutilization of financial aid resources.
- ▶ Financial aid operations are economical, efficient, and effective.
- ▶ Standard student budgets and cost of attendance are appropriately established.
- ▶ There is a process for validating the eligibility of financial aid applicants to receive assistance.
- ▶ The campus has complied with federal and state requirements and conditions stipulated by other financial aid resource providers.
- ▶ Financial aid is packaged in accordance with applicable policies and procedures.
- ▶ Financial aid decisions are made based on accurate verifications.
- ▶ Fee waivers have been factored into financial aid awards.
- ▶ Work-study program limits have not been exceeded.
- ▶ Separation of duties between awarding and disbursing is adequate.
- ▶ Disbursements are adequately controlled.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment A, Audit Agenda Item 2 of the January 26 and 27, 2010, meeting of the Committee on Audit stated that financial aid includes the identification of financial aid resources, establishing student budgets, packaging financial aid awards, coordinating financial aid benefits, managing financial aid funds, complying with federal and state program requirements, securing financial aid applicant information, and preparing financial aid reports.

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 that accounting 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 policies, letters, and directives. The audit focused on procedures in effect from July 1, 2008, through March 22, 2010. In instances wherein it was necessary to review annualized data, fiscal years 2008/09 and 2009/10 were the periods reviewed.

A preliminary risk assessment of campus financial aid operations was used to select for our audit testing those areas or activities with the highest risk. This assessment was based upon a systematic process using prior audits, management's feedback, and professional judgments on probable adverse conditions and other pertinent information, including prior audit history in this area. We sought to assign higher review priorities to activities with higher risks. As a result, not all risks identified were included within the scope of our review.

Based upon this assessment of risks, we specifically included within the scope of our review the following:

- ▶ The financial aid organization.
- ▶ Physical and logical security for sensitive financial aid information.
- ▶ Safeguarding financial aid automated systems.
- ▶ Recordkeeping for financial aid.
- ▶ Coordination between the financial aid department and other campus departments.
- ▶ Procedures used to avoid overcommitment or underutilization of financial aid resources.
- ▶ Establishing and calculating student budgets and cost of attendance.
- ▶ Establishing student eligibility for financial aid.
- ▶ Campus policies and professional judgment used for awarding of financial aid.
- ▶ Information verification procedures for financial aid applications.
- ▶ Work-study program payment compliance with federal regulations and campus guidelines.
- ▶ Appropriate separation of duties for awarding and disbursing financial aid.
- ▶ Disbursement procedures for financial aid payments.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

FEDERAL STUDENT AID POLICIES AND PROCEDURES

The campus did not have formal policies and procedures documented to address the assignment of appropriate roles and responsibilities for various key financial aid operational areas.

Government Code (GC) §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions.

State Administrative Manual (SAM) §20050 states that one symptom of a deficient internal control system is policy and procedural or operational manuals that are either not currently maintained or are non-existent.

The director of financial aid stated that although a large volume of written business process guides, instruction sheets, and informal policies and procedures exist, the lack of formal policies and procedures was the result of not having a clear definition of what constitutes a policy and/or procedure.

Failure to document policies and procedures limits the effectiveness of administrative capability, increases the risk of misunderstandings regarding employees' responsibilities, and limits the campus financial aid office's ability to adequately administer an FSA program.

Recommendation 1

We recommend that the campus formally document policies and procedures to address the assignment of appropriate roles and responsibilities for various key financial aid operational areas.

Campus Response

We concur. We will formally document policies and procedures to address the assignment of appropriate roles and responsibilities for various key financial aid operational areas.

Estimated date of completion: February 28, 2011

CONSUMER INFORMATION

Procedures had not been developed to ensure that required consumer disclosures were made using appropriate delivery methods.

Specifically, we found that:

- ▶ The campus did not verify that required consumer disclosures were being made.
- ▶ There was no evidence that appropriate delivery methods were used for consumer disclosures.

The U.S. Department of Education *Program Review Guide for Institutions 2009* states that the financial aid department should be capable of furnishing evidence regarding the campus' compliance with consumer disclosure requirements immediately upon the request of a reviewing agency.

Federal Student Aid Handbook, Volume 2, *School Eligibility and Operations*, 2009-2010, states that a school's chief administrative officer must sign a program participation agreement assuring, among other topics, that the school is in compliance with all required consumer disclosures. It also states that a school must ensure that all required consumer disclosures are being made and that failure to do so can result in the limiting, suspending, or terminating of the school's ability to participate in such programs.

The Blue Book, Chapter 12, dated July 2005, provides a listing of consumer disclosures and disclosure methods that the campus must make and must be capable of demonstrating compliance with.

The director of financial aid stated that the office did not verify the timing and method of required consumer disclosures because it was assumed that the various campus departments performed their disclosures as required.

Failure to ensure that consumer disclosures are completed using appropriate delivery methods jeopardizes the institutional eligibility of the campus to participate in federal financial aid programs.

Recommendation 2

We recommend that the campus develop procedures to ensure that required consumer disclosures are made using appropriate delivery methods.

Campus Response

We concur. We will develop a policy and procedure to ensure that required consumer disclosures are made using appropriate delivery methods.

Estimated date of completion: February 28, 2011

ADMINISTRATION OF PEOPLESOFT FINANCIAL AID SYSTEM ACCESS

The procedures used to monitor the PeopleSoft (PS) user access privileges for the scholarship coordinator were not formally documented.

We noted that the scholarship coordinator had PS user access privileges that allowed for the modification of financial aid awards without restriction and without direct oversight or supervision by financial aid department management.

The Blue Book, Chapter 12, dated July 2005, states that schools that participate in federal Title IV programs shall provide for the segregation of computer security duties and responsibilities, including granting appropriate levels of access to staff and limiting an employee's access to only those functions necessary to perform his/her assigned duties. Methods by which this segregation of duties is established are to include adequate software-security controls.

SAM §5335.1 states that each agency must establish controls to ensure that data entered into and stored in its automated files and databases are complete and accurate.

The director of financial aid stated that the scholarship office coordinator was granted financial aid modification privileges in PS to fulfill the job function and has received informal training. She further stated that although the department has enacted informal detective controls for the scholarship coordinator's activities, such controls have not been formally documented or evaluated.

Failure to document the procedures used to periodically review and monitor PS user access increases the risk of inappropriate access.

Recommendation 3

We recommend that the procedures used to review and monitor PS user access privileges for the scholarship coordinator be formally documented.

Campus Response

We concur. We will develop and formally document procedures to review and monitor PS user access privileges for the scholarship coordinator.

Estimated date of completion: February 28, 2011

ADMINISTRATION OF THE SINGULARITY IMAGING SYSTEM

Administration of the Singularity document imaging system (imaging system) used to archive Family Education Rights and Privacy Act of 1974 (FERPA) protected FSA documents needed improvement.

We found that:

- ▶ The campus had not performed a risk assessment that directly addressed the security vulnerabilities, loss potentials, and loss probabilities of the imaging system.
- ▶ All backups for the imaging system were stored at Humboldt State University (HSU), but a formal agreement had not been established regarding this arrangement.

- ▶ Campus data restoration procedures for the imaging system did not include a description explaining how data would be recovered from HSU in the event of a disaster.

Federal Student Aid Handbook, Volume 2, *School Eligibility and Operations*, 2009-2010, states that the institution must identify reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assess the sufficiency of any safeguards in place to control these risks. At a minimum, the school's risk assessment should include consideration of risks in each relevant area of operations, including:

- ▶ Employee training and management.
- ▶ Information systems, including network and software design, as well as information processing, storage, transmission, and disposal.
- ▶ Detecting, preventing, and responding to attacks, intrusions, or other systems failures.

The Blue Book, Chapter 12, dated July 2005, states that the institution has the responsibility to establish reasonable electronic data processing controls such as providing adequate system and data-file backup, contingency, disaster recovery, and business resumption.

EO 1014, *CSU Business Continuity Program*, dated October 8, 2007, states that each campus president, or his/her designee, has the responsibility for implementing and maintaining an ongoing program on each campus that ensures continuity of essential functions or operations following or during the recovery phase of a catastrophic event.

SAM §4843.1 requires state agencies to establish and maintain both an operational recovery plan to protect its information assets in the event of a disaster or serious disruption of its operations, and a plan for resuming operations following a disaster affecting those applications.

CSU *Information Security Policy*, dated April 19, 2010, states that the campus president is responsible for ensuring the security and integrity of data stored within the campus computer systems and compliance with federal and state regulations.

The information security officer stated that the specific Singularity system risks, backup, and restoration procedures had not been addressed because the server was located in the data center, which had undergone a general risk assessment recently. In addition, he stated that the lack of a formal agreement with HSU was an oversight because the existing storage arrangement had been in place for more than 15 years.

Failure to properly assess the risks associated with backup and recovery of FERPA protected data, maintain a formal backup and restoration agreement with an off-site backup location, and document specific recovery procedures increases the likelihood of potential data loss.

Recommendation 4

We recommend that the campus:

- a. Perform a risk assessment that specifically addresses the security vulnerabilities, loss potentials, and loss probabilities of the imaging system.
- b. Establish an agreement with HSU for the off-site storage of backup media.
- c. Update data restoration procedures for the imaging system to include information detailing how to recover data from HSU in the event of a disaster.

Campus Response

We concur.

- a. A fully qualitative risk assessment report will be created that includes an inventory of the system, including users, user security awareness training, the number of documents stored, and a logical diagram of the system; a verification that protected data resides on the system; a list of possible threat sources and vulnerabilities; a risk assessment without additional controls or countermeasures (inherent risks); and a list of some possible controls and a risk assessment with possible controls applied (residual risks).
- b. We will contact HSU to create a formal agreement to house off-site storage of backup media.
- c. We will add additional documentation to the existing procedures for Hershey Singularity reflecting the process of recovering backup media from HSU and restoring the server in the event of a disaster.

Estimated date of completion: February 28, 2011

FISCAL AND PROGRAM OVERSIGHT AND COORDINATION

Procedures to ensure against the overcommitment of FSA funds had not been formally documented.

EO 1000, *Delegation of Fiscal Authority and Responsibility*, dated July 1, 2007, states that the campus president shall ensure that expenditure commitments do not exceed available resources.

GC §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which include documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions.

The director of financial aid stated that procedures to ensure against the overcommitment of FSA funds were in place and effective, but they had not been documented due to time constraints and conflicting departmental priorities.

Failure to document procedures to ensure against the overcommitment of FSA funds increases the likelihood that the campus would overextend funding and create a financial liability for the CSU.

Recommendation 5

We recommend that the campus formally document the procedures used to ensure against the overcommitment of FSA funds.

Campus Response

We concur. We will formally document the procedures used to ensure against the overcommitment of FSA funds.

Estimated date of completion: February 28, 2011

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Rubin Armiñana	President
Barry Blackburn	Information Security Officer
Lisa Brooks	Administrative Program Specialist, Educational Opportunity Program (EOP)
Yvonne Burbank	Assistant Athletics Director/Senior Women's Administrator
Joyce Chong	Managing Director, Advising, Career, EOP, and Testing Services
Barbara Danelia	Assistant to the Vice President, Administration and Finance
Renee Deorsey	CMS Functional Lead/System Coordinator, Financial Aid (At time of review)
Laurence Furukawa-Schlereth	Vice President, Administration and Finance and Chief Financial Officer
Gina Geck	Associate Director, Admissions and Student Recruitment
Sara Golightly	Scholarship Coordinator
Susan Gutierrez	Director, Financial Aid
Nicole Hendry	Associate Director, Housing
Julia Ibanez	Loan Coordinator, Financial Aid
Teresa James	Systems Compliance Coordinator, Financial Aid
Natalie Kalogiannis	Academic Records Specialist
Kurt Koehle	Director, Internal Operations Analysis and Review
Mathew Lopez-Phillips	Vice President, Student Affairs and Enrollment Management
Lisa Lozano	Lead Accountant, Financial Aid
Robin Marshal	Director, Workstation Security and Services
Susan Michels	Financial Administrator, Office of the Dean – Extended Education
Steven Nank	Receiving Coordinator
Lisa Noto	University Registrar
Gloria Ogg	Senior Director, University Business Services
Lane Olson	Senior Credential Analyst
Brian Orr	Senior Accountant, Financial Services
Bruce Peterson	Senior Program Specialist, Academic Advising
Nicholas Saschin	Cashier/Accounts Receivable Administrator
Carrie Schmidt	Representative, Financial Aid
Jean Snyder	Accountant II, Financial Services
Jason Wenrick	Senior Director, CMS



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OFFICE OF THE CHIEF FINANCIAL OFFICER AND
VICE PRESIDENT FOR ADMINISTRATION AND FINANCE

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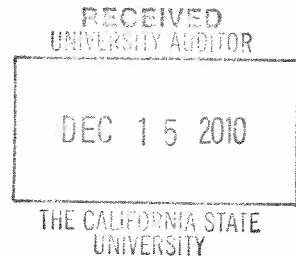
December 15, 2010

MEMORANDUM

TO: Larry Mandel
University Auditor
California State University
Chancellor's Office

FROM: Laurence Furukawa-Schlereth
Chief Financial Officer and
Vice-President for Administration and Finance

SUBJECT: Campus Response, Financial Aid Audit Report No. 10-40



On behalf of President Armiñana, I am submitting the Campus Response to the recommendations of *Audit Report 10-40, Financial Aid at Sonoma State University*. The response will also be forwarded to your staff electronically.

We are taking action to implement the recommendations, and will provide documentation to demonstrate completion of corrective actions for each recommendation.

Enclosure

c: President Ruben Armiñana
Letitia Coate
Gloria Ogg
Jason Wenrick
John Hayes
Barry Blackburn
Thomas Marshall
Brian Orr
Kurt Koehle

FINANCIAL AID
SONOMA STATE UNIVERSITY
Audit Report 10-40

GENERAL ENVIRONMENT

FEDERAL STUDENT AID POLICIES AND PROCEDURES

Recommendation 1

We recommend that the campus formally document policies and procedures to address the assignment of appropriate roles and responsibilities for various key financial aid operational areas.

Campus Response

We agree. We will formally document policies and procedures to address the assignment of appropriate roles and responsibilities for various key financial aid operational areas.

Estimated date of completion: February 28, 2011

CONSUMER INFORMATION

Recommendation 2

We recommend that the campus develop procedures to ensure that required consumer disclosures are made using appropriate delivery methods.

Campus Response

We concur. We will develop a policy and procedure to ensure that required consumer disclosures are made using appropriate delivery methods.

Estimated date of completion: February 28, 2011

ADMINISTRATION OF PEOPLESOFT FINANCIAL AID SYSTEM ACCESS

Recommendation 3

We recommend that the procedures used to review and monitor PS user access privileges for the scholarship coordinator be formally documented.

Campus Response

We concur. We will develop and formally document procedures to review and monitor PS user access privileges for the scholarship coordinator.

Estimated date of completion: February 28, 2011

ADMINISTRATION OF THE SINGULARITY IMAGING SYSTEM**Recommendation 4**

We recommend that the campus:

- a. Perform a risk assessment that specifically addresses the security vulnerabilities, loss potentials, and loss probabilities of the imaging system.
- b. Establish an agreement with HSU for the off-site storage of backup media.
- c. Update data restoration procedures for the imaging system to include information detailing how to recover data from HSU in the event of a disaster.

Campus Response

We concur.

- a. A fully qualitative risk assessment report will be created that includes: an inventory of the system including users, user security awareness training, the number of documents stored, and a logical diagram of the system; a verification that protected data resides on the system; a list of possible threat sources and vulnerabilities; a risk assessment without additional controls or countermeasures (inherent risks); list of some possible controls and a risk assessment with possible controls applied (residual risks).
- b. We will contact CSU Humboldt to create a formal agreement to house off-site storage of backup media.
- c. We will add additional documentation to the existing procedures for Hershey Singularity reflecting the process of recovering backup media from CSU Humboldt and restoring the server in the event of a disaster.

Estimated date of completion: February 28, 2011

FISCAL AND PROGRAM OVERSIGHT AND COORDINATION**Recommendation 5**

We recommend that the campus formally document the procedures used to ensure against the overcommitment of FSA funds.

Campus Response

We concur. We will formally document the procedures used to ensure against the overcommitment of FSA funds.

Estimated date of completion: February 28, 2011

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

January 14, 2011

CHICO

DOMINGUEZ HILLS

MEMORANDUM

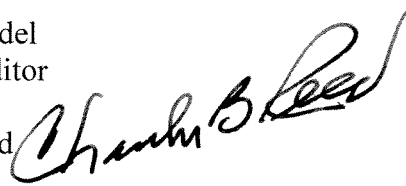
EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

SUBJECT: Draft Final Report 10-40 on *Financial Aid*,
Sonoma State University

LONG BEACH

LOS ANGELES

In response to your memorandum of January 14, 2011, I accept the response as submitted with the draft final report on *Financial Aid*, Sonoma State University.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS