

**FISMA**

**CALIFORNIA STATE UNIVERSITY,  
FULLERTON**

**Report Number 02-11  
August 22, 2003**

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Roberta Achtenberg, Vice Chair  
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**BOARD OF TRUSTEES**

**THE CALIFORNIA STATE UNIVERSITY**

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## **ABBREVIATIONS**

CSU	California State University
CSUF	California State University, Fullerton
FISMA	Financial Integrity and State Manager's Accountability Act
SAM	State Administrative Manual
SUAM	State University Accounting Manual
UEES	University Extended Education Services

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## **INTRODUCTION**

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### **PURPOSE**

The principal audit objective was to assess the adequacy of controls and systems to ensure that:

- ▶ Cash receipts are processed in accordance with laws, regulations, and management policies.
- ▶ Receivables are promptly recognized and balances are periodically evaluated.
- ▶ Purchases are made in accordance with laws, regulations, and management policies.
- ▶ Revolving fund disbursements are authorized and processed in accordance with laws, regulations, and management policies.
- ▶ Cash disbursements are properly authorized and made in accordance with established procedures, and adequate segregation of duties exists.
- ▶ Payroll/personnel criteria for hiring employees, establishing compensation rates and authorizing disbursements are controlled, and access to personnel and payroll records and processing areas are restricted.
- ▶ Purchase and disposition of fixed assets are controlled and assets are promptly recorded in the subsidiary records.
- ▶ Physical computer controls are in place and functioning.
- ▶ Investments are adequately controlled and securities are safeguarded.
- ▶ Trust funds are established in accordance with State University Administrative Manual (SUAM) guidelines.

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### **SCOPE AND METHODOLOGY**

The management 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. For those audit tests that required annualized data, fiscal year 2001-2002 was the primary period reviewed. In certain instances, we were concerned with representations of the most current data—in such cases, the test period was July 2002 to February 2003. Our primary focus was on internal controls. Specifically, we reviewed and tested:

- ▶ Procedures for receipting and storing cash, segregation of duties involving cash receipting and recording of cash receipts.

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## INTRODUCTION

- ▶ Establishment of receivables and adequate segregation of duties regarding billing and payment of receivables.
- ▶ Approval of purchases, receiving procedures and reconciliation of expenditures to State Controller's balances.
- ▶ Limitations on the size and types of revolving fund disbursements.
- ▶ Use of petty cash funds, periodic cash counts, and reconciliation of bank accounts.
- ▶ Authorization of personnel/payroll transactions and accumulation of leave credits in compliance with state policies.
- ▶ Posting of the property ledger, monthly reconciliation of the property to the general ledger, and physical inventories.
- ▶ Access restrictions to automated accounting systems and proper documentation of the systems.
- ▶ Procedures for initiating, evaluating, and accounting for investments.
- ▶ Establishment of trust funds, separate accounting, adequate agreements, and annual budgets.

We have not performed any auditing procedures beyond the date of our report. Accordingly, our comments are based on our knowledge as of that date. Since the purpose of our comments is to suggest areas for improvement, comments on favorable matters are not addressed.

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## BACKGROUND

In 1983, the California Legislature passed the Financial Integrity and State Manager's Accountability Act of 1983 (FISMA). This act required state agencies to establish and maintain a system of internal accounting and administrative control. To ensure that the requirements are fully complied with, the head of each agency is required to prepare and submit a report on the adequacy of the system of internal accounting and administrative control following the end of each odd-numbered fiscal year. The Office of the University Auditor of the California State University (CSU) is currently responsible for conducting such audits within the CSU.

This report represents our biennial review.

## **OPINION**

We visited the CSU Fullerton (CSUF) campus from December 16, 2002, through February 12, 2003, and made a study and evaluation of the accounting and administrative control in effect as of February 12, 2003. Our study and evaluation were conducted in accordance with the 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.

CSUF management is responsible for establishing and maintaining adequate internal control. This responsibility, in accordance with Government Code, Sections 13402 et seq., includes documenting internal control, communicating requirements to employees, and assuring that internal control is functioning as prescribed. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of control procedures.

The objectives of accounting and administrative control are to provide management with reasonable, but not absolute, assurance that:

- ▶ Assets are safeguarded against loss from unauthorized use or disposition.
- ▶ Transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of reliable financial statements.
- ▶ Financial operations are conducted in accordance with policies and procedures established in the State Administrative Manual, Education Code, Title 5 and Trustee policy.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on the accounting and administrative controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report.

In our opinion, the accounting and administrative control at CSUF in effect as of February 12, 2003, taken as a whole, was sufficient to meet the objectives stated above.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls change 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.

## **EXECUTIVE SUMMARY**

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **CASH RECEIPTS [6]**

#### **SATELLITE CASHIERING [6]**

Cash control weaknesses were found at two of the four satellite cashiering locations visited. Adequately controlling cash receipts and separating duties reduce campus exposure to loss from inappropriate acts.

#### **STATE UNIVERSITY FEE RECONCILIATIONS [7]**

The campus did not complete the reconciliation of state university fees in a proper and timely manner. Proper and timely fee reconciliations reduce the risk that errors and irregularities will not be detected.

### **ACCOUNTS RECEIVABLE [8]**

Campus procedures did not ensure the timely billing of faculty release time. Presenting charges and collecting accounts receivable in a timely manner increase working capital and limit the potential for loss of revenue to the state.

### **PAYROLL AND PERSONNEL [8]**

#### **EMPLOYEE SEPARATION PROCEDURES [9]**

The employee separation controls did not ensure timely and complete documentation and consistent notification of employment status to permit removal of system access privileges. Timely and complete separation controls reduce the risk of loss of state funds and inappropriate use of state resources.

#### **UNDELIVERABLE SALARY WARRANTS [10]**

Undeliverable salary warrants were not remitted to the State Controller's Office timely. Sufficient control of undeliverable salary warrants reduces the risk of misappropriated funds.

**FIXED ASSETS [11]**

Property survey reports were not always properly and timely completed. Properly completed and timely property survey reports enhance accountability over the disposal of state property.

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# OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

## CASH RECEIPTS

### SATELLITE CASHIERING

Cash control weaknesses were found at two of the four satellite cashiering locations visited.

The satellite cashiering locations reviewed included parking and transportation services, housing and residential life, university extended education services (UEES), and the titan card program.

#### Housing and Residential Life

- ▶ Housing occupancy records were not reconciled to revenue recorded in the general ledger.
- ▶ The record of the date the safe combination was last changed and the names of persons knowing the present combination had not been updated.

The director of housing and residential life indicated that the department was not aware of the need to reconcile housing revenue, while not updating the record of persons with knowledge of the safe combination and the date the combination was last changed was an oversight.

#### UEES

- ▶ The record of the date the safe combination was last changed and the names of persons knowing the present combination had not been updated.
- ▶ Monthly reconciliations for non-credit extension courses did not show the name of the preparer and the reviewer and/or the date prepared and reviewed to provide accountability and/or to evidence the timeliness of the reconciliations.
- ▶ Although tuition fees for credit extension courses were reviewed, a documented reconciliation of tuition fees to revenue recorded in the general ledger had not been prepared.

The director of budget and finance at UEES indicated that the department was not aware of the requirement to sign and date the reconciliations, and department procedures to reconcile revenue from credit extension courses were to do so on an informal basis.

State Administrative Manual (SAM) §8024 requires retaining a record listing the names of individuals with knowledge of a department's safe combination and changing safe combinations when any employee no longer requires the combination in the performance of their duties.

SAM §7901 states that the accuracy of accounting records may be proved partially by making certain reconciliations and verifications. It requires that all reconciliations be retained at least two years.

SAM §7908 requires that all reconciliations show the preparer's name, reviewer's name, date prepared, and date reviewed.

Inadequate control over cash receipts increases campus exposure to loss from inappropriate acts.

### **Recommendation 1**

We recommend that the campus:

- a. Update the record to show the date the safe combination last changed and the individuals who have the combination at the housing and residential life office and UEES and strengthen procedures to ensure that the records are maintained current for all satellite locations.
- b. Strengthen controls at the housing and residential life office and UEES to ensure that reconciliations of revenues are prepared and documented as well as appropriately signed and dated.

### **Campus Response**

We concur.

- a. Corrected during audit and further action is not anticipated.
- b. We will implement the requisite housing reconciliation process by December 2003 and are now performing the UEES reconciliations in the format recommended by the auditor.

## **STATE UNIVERSITY FEE RECONCILIATIONS**

The campus did not complete the reconciliation of state university fees in a proper and timely manner.

We noted that the campus:

- ▶ Compiled state university fees by date, applicant, and amount from common entries on the subsidiary and general ledger. The compilation showed the number of students and waivers. However, a proper reconciliation would be based on the number of students reported on the census date less waivers approved.
- ▶ Reconciled state university fees to the subsidiary and general ledger at fiscal year-end. However, a timely reconciliation should be prepared for the census date of each academic term.

State University Administrative Manual (SUAM) §3825.02 requires that a reconciliation of state university fees to the census date report be prepared for each academic term.

The chief financial officer stated her belief that the controls in place for the reconciliation of state university fees were adequate.

Improper and untimely fee reconciliations increase the risk that errors and irregularities will not be detected.

**Recommendation 2**

We recommend that the campus reconcile state university fees against the number of students reported on the census date less approved fee waivers for each academic term.

**Campus Response**

We concur. As per the documentation provided, we are now reconciling fees at the requisite dates and in the manner requested by the auditor.

**ACCOUNTS RECEIVABLE**

Campus procedures did not ensure the timely billing of faculty release time.

A review of 15 invoices issued between August and December 2002 showed that four billings to auxiliary organizations and a third party entity, for salaries and benefits from faculty release time, were invoiced between 60 days to two years after the services were provided.

SAM §8776.3 requires invoices to be prepared as soon as possible after recognition of a claim.

The chief financial officer indicated that the delayed billing of faculty release time was attributed to untimely data provided by sponsored program administrators.

Untimely billing of invoice or recharge outstanding obligations due to the General Fund from other sources reduces working capital and the likelihood of collecting funds.

**Recommendation 3**

We recommend that the campus strengthen procedures to ensure that billings for faculty release time are prepared in a timely manner.

**Campus Response**

We concur. We are enhancing the process used to assure the timely submission of documentation required to bill faculty release time. The enhanced process is expected to be in place by January 2004.

**PAYROLL AND PERSONNEL**

## **EMPLOYEE SEPARATION PROCEDURES**

Employee separation controls did not ensure timely and complete documentation and consistent notification of employment status to permit removal of system access privileges.

Our review of 15 employee separations between January and November 2002 disclosed that:

- ▶ It took an average of 182 days to complete a property clearance form after the separation date for 11 employees.
- ▶ In four instances, the property clearance form was not certified by the department for the return of equipment, keys, or library materials.
- ▶ In ten instances, the property clearance form was not certified by the separating employee for the removal of campus-owned software from off-site computers.
- ▶ In 11 instances, the property clearance form was not signed by the separating employee.

Additionally, it was noted that persons responsible for administering application security for several ancillary application systems (i.e., data warehouse, imaging, and application manager) were not consistently included in the process to remove accounts that were no longer needed.

SAM §8580.4 describes the need for adequate separation procedures, including preparation of a clearance form that includes clearance of revolving fund advances (travel and salary), return of keys, equipment, credit cards, etc.

SAM §4842.2 states that personnel practices related to security management must include termination procedures that ensure that agency information assets are not accessible to former employees.

The chief financial officer indicated that the ability to withhold payment of wages at separation reduced the effectiveness of separation procedures. The senior director of business systems indicated that the persons responsible for administering security had not been included in the notification process because these are relatively new systems.

Insufficient control over employee separations increases the risk of loss of state funds, inappropriate use of state resources, and unauthorized access to campus systems and confidential data.

**Recommendation 4**

We recommend that the campus:

- a. Review and strengthen employee separation procedures to ensure timely and complete property clearance forms.
- b. Amend its computer access removal procedures to ensure that computer accounts are deleted in a timely manner.

**Campus Response**

We concur. We are in the process of developing a more reliable process to document the timely and complete return of university property and removal of computer access upon employee separation. We anticipate the new process will be in place by January 2004.

**UNDELIVERABLE SALARY WARRANTS**

Undeliverable salary warrants were not remitted to the State Controller’s Office timely.

During our fieldwork in January 2003, we noted that 69 salary warrants over 90 days old were in custody pending remittance to the State Controller’s Office. Specifically,

Aging	Number
3 to 6 months	32
6 to 7 months	25
9 to 12 months	11
Over 1 year	1
Total	69

SAM §8580.5 requires that salary warrants not delivered within 90 calendar days of receipt must be deposited and remitted to an escheat revenue account in the original fund that provides the resources to the state payroll revolving fund.

The director of payroll and payables indicated that a portion of the undeliverable salary warrants was attributable to incomplete property clearance of separated employees.

Untimely remittance of undeliverable salary warrants increases the risk of misappropriated funds.

**Recommendation 5**

We recommend that the campus strengthen procedures to ensure that undelivered salary warrants are returned timely to the State Controller’s Office.

### **Campus Response**

We concur. The campus has filled the open payroll position and all undelivered warrants greater than 90 days old have been returned to the State Controller's Office. All corrective action has been completed.

## **FIXED ASSETS**

Property survey reports were not always properly and timely completed.

Our review of 15 property survey reports dated between March 2001 and November 2002 disclosed that:

- ▶ In two instances, only one member of the property survey board authorized the disposition.
- ▶ In ten instances, the property survey board approved the survey report after the disposition had occurred, an average of 77 days later.
- ▶ In one instance, a transfer of location of equipment form for four property items was completed by the recipient agency four months after the property survey report date.
- ▶ In one instance, an acknowledgement for reutilization was received nine months after the property survey report date.

SAM §3520.2 requires that at least two members of the property survey board approve all property survey reports and any transfers of location of equipment.

SAM §20050 states that the elements of a satisfactory system of internal accounting and administrative controls include a system of authorization and record-keeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The property manager indicated that the property survey reports were authorized by a single board member and delayed acknowledgments for the transfer and donation were attributed to a misunderstanding of the policies and procedures. The director of physical plant indicated his belief that the role of the property survey board was to only monitor dispositions of assets.

Incomplete and untimely property survey reports reduce accountability over the disposal of state property.

### **Recommendation 6**

We recommend that the campus strengthen property survey controls to ensure compliance with internal control requirements.

**Campus Response**

We concur. All survey reports will be signed by two survey board members in the timeliest manner possible. All corrective action has been completed.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Dr. Milton A. Gordon	President
Elahe Amani	Director, Student Financial Services
Cathy Arthur	Information Technology Consultant, Telephone Services
Margaret Atwell	Associate Vice President, Academic Affairs
Dick Bednar	Director, Information Technology Services
Andrea Brown	Program Manager, Titan Card Program
Jeni Cansler	Manager, Telephone Services
Pearl Cheng	Director of Finance and Administration, CSUF Foundation
Jim Corbett	Projects and Programs Manager, Physical Plant
Amir Dabirian	Director, Internet and Document Management
Debbie Ellis	Background Investigator/Accreditation Manager, University Police
Marilou Encina	Supervisor, Payroll Services
Sandra Farina	Accounting Technician, Physical Plant
Joseph Ferrer	Director, Parking and Transportation Services
Ed Flynn	Mail Center Supervisor, Physical Plant
Naomi Goodwin	Assistant Vice President, Administration
Holly Hall	Assistant Director of Operational Services, Physical Plant
Kathie Ip	Accountant, Accounting Services
Terry Jarmon	Property Manager, Physical Plant
Susan Kachner	Director, Administrative Computing
Lisa Kopecky	Director, Academic Affairs Budget
Alex Landeros	Manager, Operating Systems
Susan Lasswell	Director of Communications, Information Technology
John Lynn	Executive Director, Human Resources
Michael Marcinkevicz	Director, Network Applications
Kristina Merriss	Customer Service Analyst, UEES
Phyllis Miller	Interim Senior Director, Financial Management
Danny Miranda	Logistical Service Manager, Physical Plant
Sherri Newcomb	Chief Financial Officer
Loan Nguyen	Accounting Supervisor, Titan Card Program
Michael Parker	Chief Information Technology Officer
Kathy Perkins	Supervisor, Computer Operations
Cheryl Perreira	Senior Director, Business Planning and Improvement
Jack Plump	Acting Supervisor of Reprographics, Physical Plant
Lydia Rodriguez	Lead Accountant, Accounting Services
Gaye Rogers	Accountant, Accounting Services
Judith Ryker	Records Supervisor, University Police
Patricia Simms	Manager of Human Resources, CSUF Foundation
Darlene Stevenson	Director, Housing and Residential Life
Keiko Takahashi	Senior Director, Business Systems
Tanya Thompson	Interim Director of Sponsored Programs, CSUF Foundation
Alexander Tzoumas	Director, Internal Audit
Willem Van der Pol	Director, Physical Plant

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APPENDIX A

Khanh Vanpetten	Director of Budget and Finance, UEES
Karen Wall	Assistant Vice President, Student Affairs
Anna Wang	Accountant, Accounting Services
Candi Watkins	Operations Manager, Parking and Transportation Services
Deborah Wiedeman	Budget Coordinator, Physical Plant
May Wong	Director, Payroll and Payables

## **STATEMENT OF INTERNAL CONTROLS**

### **A. INTRODUCTION**

Internal accounting and related operational controls established by the state of California, the CSU Board of Trustees, and the Office of the Chancellor are evaluated by the University Auditor, in compliance with professional standards for the conduct of internal audits, to determine if an adequate system of internal control exists and is effective for the purposes intended. Any deficiencies observed are brought to the attention of appropriate management for corrective action.

### **B. INTERNAL CONTROL DEFINITION**

Internal control, in the broad sense, includes controls which may be characterized as either accounting or operational as follows:

#### **1. Internal Accounting Controls**

Internal accounting controls comprise the plan of organization and all methods and procedures that are concerned mainly with, and relate directly to, the safeguarding of assets and the reliability of financial records. They generally include such controls as the systems of authorization and approval, separation of duties concerned with record keeping and accounting reports from those concerned with operations or asset custody, physical controls over assets, and personnel of a quality commensurate with responsibilities.

#### **2. Operational Controls**

Operational controls comprise the plan of organization and all methods and procedures that are concerned mainly with operational efficiency and adherence to managerial policies and usually relate only indirectly to the financial records.

### **C. INTERNAL CONTROL OBJECTIVES**

The objective of internal accounting and related operational control is to provide reasonable, but not absolute, assurance as to the safeguarding of assets against loss from unauthorized use or disposition, and the reliability of financial records for preparing financial statements and maintaining accountability for assets. The concept of reasonable assurance recognizes that the cost of a system of internal accounting and operational control should not exceed the benefits derived and also recognizes that the evaluation of these factors necessarily requires estimates and judgment by management.

**D. INTERNAL CONTROL SYSTEMS LIMITATIONS**

There are inherent limitations that should be recognized in considering the potential effectiveness of any system of internal accounting and related operational control. In the performance of most control procedures, errors can result from misunderstanding of instruction, mistakes of judgment, carelessness, or other personal factors. Control procedures whose effectiveness depends upon segregation of duties can be circumvented by collusion. Similarly, control procedures can be circumvented intentionally by management with respect to the executing and recording of transactions. Moreover, projection of any evaluation of internal accounting and operational control to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions and that the degree of compliance with the procedures may deteriorate. It is with these understandings that internal audit reports are presented to management for review and use.



Office of the President  
 (714) 278-3456 / Fax (714) 278-2649

**TO:** Larry Mandel  
 University Auditor

**DATE:** October 2, 2003

**FROM:** Milton A. Gordon  
 President 



**SUBJECT:** Response for FISMA Audit

I am pleased to forward California State University, Fullerton's official response to the recommendations in the Incomplete Draft of the Financial Integrity and State Manager's Accountability Act report, No. 02-11.

Once again, we would like to thank the University Auditor and his staff for conducting the audit in a professional manner and identifying meaningful ways to improve our financial controls.

The Campus Auditor, Alex Tzoumas, will also forward the responses to you electronically for your convenience. Should you have questions, please contact Alex at 714-278-5760 or [atzoumas@fullerton.edu](mailto:atzoumas@fullerton.edu).

#### Attachment

cc: Willie J. Hagan, Vice President for Administration  
 Sherri L. Newcomb, Chief Financial Officer  
 Robert L. Palmer, Vice President for Student Affairs  
 Ephraim P. Smith, Vice President for Academic Affairs  
 Alexander G. Tzoumas, Director Internal Audit

## FISMA REPORT, No. 02-11 RECOMMENDATIONS AND CAMPUS RESPONSES

### CASH RECEIPTS

#### SATELLITE CASHIERING

##### **Recommendation 1**

We recommend that the campus:

a. Update the record to show the date the safe combination last changed and the individuals who have the combination at the housing and residential life office and UEES and strengthen procedures to ensure that the records are maintained current for all satellite locations.

##### **Campus Response**

We concur. Corrected during audit and further action is not anticipated

b. Strengthen controls at the housing and residential life office and UEES to ensure that reconciliations of revenues are prepared and documented as well as appropriately signed and dated.

##### **Campus Response**

We concur. We will implement the requisite housing reconciliation process by December 2003 and are now performing the UEES reconciliations in the format recommended by the auditor.

### STATE UNIVERSITY FEE RECONCILIATIONS

##### **Recommendation 2**

We recommend that the campus reconcile state university fees against the number of students reported on the census date less approved fee waivers for each academic term.

##### **Campus Response**

We concur. As per the documentation provided, we are now reconciling fees at the requisite dates and in the manner requested by the auditor.

### ACCOUNTS RECEIVABLE

##### **Recommendation 3**

We recommend that the campus strengthen procedures to ensure that billings for faculty release time are prepared in a timely manner.

**Campus Response**

We concur. We are enhancing the process used to assure the timely submission of documentation required to bill faculty release time. The enhanced process is expected to be in place by January 2004.

## **PAYROLL AND PERSONNEL EMPLOYEE SEPARATION PROCEDURES**

**Recommendation 4**

We recommend that the campus:

- a. Review and strengthen employee separation procedures to ensure timely and complete property clearance forms.
- b. Amend its computer access removal procedures to ensure that computer accounts are deleted in a timely manner.

**Campus Response**

We concur. We are in the process of developing a more reliable process to document the timely and complete return of University property and removal of computer access upon employee separation. We anticipate the new process will be in place by January 2004.

## **UNDELIVERABLE SALARY WARRANTS**

**Recommendation 5**

We recommend that the campus strengthen procedures to ensure that undelivered salary warrants are returned timely to the State Controller's Office.

**Campus Response**

We concur. The campus has filled the open Payroll position and all undelivered warrants greater than 90 days old have been returned to the State Controller's Office. All corrective action has been completed.

## **FIXED ASSETS**

**Recommendation 6**

We recommend that the campus strengthen property survey controls to ensure compliance with internal control requirements.

**Campus Response**

We concur. All Survey Reports will be signed by two Survey Board Members in the timeliest manner possible. All corrective action has been completed.

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

BAKERSFIELD

October 27, 2003

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILL

FRESNO

TO: Mr. Larry Mandel  
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed  
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 02-11 on *FISMA*,  
California State University, Fullerton

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of October 27, 2003, I accept the response as submitted with the draft final report on *FISMA*, California State University, Fullerton.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/bth

SACRAMENTO

Enclosure

SAN BERNARDINO

SAN DIEGO

cc: Dr. Milton A. Gordon, President  
Mr. Alex Tzoumas, Director of Internal Audit

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

TANISLAUS