FISMA

SONOMA STATE UNIVERSITY

Audit Report 09-03
October 5, 2009

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ABBREVIATIONS

CMS  Common Management Systems
CPA  Center for Performing Arts
CSU  California State University
FISMA Financial Integrity and State Manager’s Accountability Act
GC  Government Code
PS SF PeopleSoft Student Finance
SAM  State Administrative Manual
SSU  Sonoma State University
EXECUTIVE SUMMARY

The California Legislature passed the Financial Integrity and State Manager’s Accountability Act (FISMA) of 1983, Government Code (GC) Sections 13400 through 13407. This act requires state agencies to establish and maintain a system of internal accounting and administrative control. To ensure that the requirements of this act are fully complied with, state entities with internal audit units are to complete biennial internal control audits (covering accounting and fiscal compliance practices) in accordance with the International Standards for the Professional Practice of Internal Auditing (Institute of Internal Auditors) as required by GC Section 1236. The Office of the University Auditor of the California State University (CSU) is currently responsible for conducting such audits within the CSU.

Sonoma State University (SSU) management is responsible for establishing and maintaining adequate internal control. This responsibility, in accordance with GC 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.
- Established controls are not only effective but also promote operational efficiency.
- Financial operations are conducted in accordance with policies and procedures established in the State Administrative Manual, Education Code, Title 5, and Trustee policy.

We visited the SSU campus from March 9, 2009, through April 16, 2009, and made a study and evaluation of the accounting and administrative control in effect as of April 16, 2009. This report represents our biennial review.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on 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, SSU’s accounting and administrative control in effect as of April 16, 2009, 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 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 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]**

Cash control weaknesses were found at two of the three satellite cashiering areas visited. The satellite cashiering locations reviewed included athletics, customer service, and the Center for Performing Arts.

**ACCOUNTS RECEIVABLE [8]**

Collection letters for delinquent third-party and student receivables were not sent in a timely manner. In addition, the PeopleSoft Student Finance system did not allow for input of the actual due date for the receivables, which could be utilized for the mailing of 30-, 60-, and 90-day collection letters.

**PAYROLL [9]**

Duties and responsibilities relating to payroll warrants were not properly segregated.

**PROPERTY [10]**

Property was not always properly valued and correctly identified, and laptop use forms were not always on file.
INTRODUCTION

STATEMENT OF INTERNAL CONTROLS

Internal accounting and related operational controls established by the State of California, the California State University 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. The ultimate responsibility for good internal control rests with management.

Internal control, in the broad sense, includes controls that 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 recordkeeping and accounting reports from those concerned with operations or asset custody, physical controls over assets, personnel of a quality commensurate with responsibilities, and an effective system of internal review.

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.

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.

Experience indicates that the existence of certain danger signals will usually be indicative of a poorly maintained or vulnerable control system. These symptoms may apply to the organization as a whole or to individual units or activities, and generally include any of the following danger signals:

- Policy and procedural or operational manuals are either not currently maintained or are non-existent.
- Lines of organizational authority and responsibility are not clearly articulated or are non-existent.
- Financial and operational reporting is not timely and is not used as an effective management tool.
Line supervisors ignore or do not adequately monitor control compliance.

No procedures are established to assure that controls in all areas of operation are evaluated on a reasonable and timely basis.

Internal control weaknesses detected are not acted upon in a timely fashion.

Controls and/or control evaluations have little relationship to organizational exposure to risk of loss or resources.

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.

**PURPOSE**

The principal audit objectives were to assess the adequacy of the systems of internal accounting and administrative control and to determine whether financial operations were conducted in accordance with policies and procedures established in the State Administrative Manual, Education Code, Title 5, and directives of the Board of Trustees and the Office of the Chancellor. Specifically, we sought assurances that:

- Legal and regulatory requirements are complied with.
- Accounting data is provided in an accurate, timely, complete, or otherwise reliable manner.
- Assets are adequately safeguarded from loss, damage, or misappropriation.
- Duties are appropriately segregated consistent with appropriate control objectives.
- Transactions, systems output, or accounting entries are reviewed and approved.
- Management does not intentionally override internal controls to the detriment of control objectives.
- Accounting and fiscal tasks, such as reconciliations, are prepared properly and completed timely.
- Deficiencies in internal controls previously identified were corrected satisfactorily and timely.
- Management seeks to prevent or detect erroneous recordkeeping, inappropriate accounting, fraudulent financial reporting, financial loss, and exposure.
SCOPE AND METHODOLOGY

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. 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 2007/08 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 October 2008 to January 2009. Our primary focus was on internal controls.

A preliminary survey of the campus was used to identify risks. Risk was defined as the probability that an event or action would adversely affect the campus. Our assessment of risk was based upon a systematic process using management’s feedback and professional judgments on probable adverse conditions and/or events that became the basis for development of our final scope. 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:

- Procedures for receipting and storing cash, segregation of duties involving cash receipting, and recording of cash receipts.
- Use of petty cash funds, periodic cash counts, and the administration and reconciliation of bank accounts.
- Establishment of receivables and adequate segregation of duties regarding billing and payment of receivables.
- Appropriate controls over campus vendors.
- Authorization and proper classification of personnel/payroll transactions and/or 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.

We have not performed any auditing procedures beyond April 16, 2009. 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.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

CASH RECEIPTS

Cash control weaknesses were found at two of the three satellite cashiering areas visited.

The satellite cashiering locations reviewed included athletics, customer service, and the Center for Performing Arts (CPA). We found the following:

Athletics

- Cash was not adequately safeguarded. One cash box was shared by three cashiers who sold tickets at athletic events. In addition, cash overages and shortages in the cash box were not recorded in the accounting records.

- Event tickets sold by athletics did not include the ticket price. The tickets were sold at varying rates, and the department did not have a process to verify and reconcile the ticket sales against the amount of cash received by the cashiers.

- A detailed breakdown of athletics cash receipts (by type of collection such as cash or check) transported for deposit to the main cashier could not be performed in CashNet.

Center for Performing Arts

- Cash overages and shortages were not recorded in the accounting records.

- Checks were not endorsed upon receipt at the CPA box office. Instead, checks were endorsed the following morning after being stored in the safe overnight.

- A detailed breakdown of CPA cash receipts (by type of collection such as cash or check) transported for deposit to the main cashier could not be performed in CashNet.

State Administrative Manual (SAM) §7816 states that an account is maintained for each cashier that is held accountable for cash shortages. The accounts are debited when cash shortages occur and are credited when restitutions are received from cashier or discharge from accountability is received from the State Board of Control.

SAM §7920 states that each agency is responsible for completing any reconciliation necessary to safeguard assets and ensure reliable financial data.

SAM §8022 states that state agency records will contain information regarding the type of collection (such as cash, check, or money order) received from each payer and that this information will be recorded so that it can be readily audited from receipts, reports of collections, or the registers, and will show by notation the amount of the check or money order presented.
SAM §8023 states that all checks, money orders, and warrants received for deposit will be restrictively endorsed for deposit as soon as possible after receipt, but no later than the end of the working day.

SAM §8070 states that officers and employees who receive and disburse money will be held accountable for the money in their custody and that they will be held personally responsible for any cash discrepancies.

The administrative analyst in athletics stated that the use of only one cash box was due to limited resources; the department uses a manual accounting system for the ticket sales and the overage and shortages would need to be recorded in the accounting system at the time of deposit preparation; and the department was working on improving the policies and procedures for ticket sales. The box office coordinator stated that the check endorsement was performed late as there was only one endorsement stamp which was kept locked up. She also stated that the cash overages and shortages were recorded on the daily reconciliation but were not added to the accounting records at the time of deposit. The lead cashier stated that for the departments which had manual cashing systems, the department was unfamiliar with running the proper report of cash and check deposits in a timely manner.

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

**Recommendation 1**

We recommend that the campus:

a. Implement appropriate controls over cash to ensure accountability is localized to one individual at athletics.

b. Record cash overages and shortages in the accounting records for athletics and the CPA.

c. Endorse checks immediately upon receipt or at a minimum by the end of the day at the CPA.

d. Include the price on athletics event tickets sold and implement a process to verify and reconcile the ticket sales against the amount of cash received by the cashiers by the ticket sales price.

e. Include a detailed breakdown of cash receipts in CashNet for all satellite locations that transport deposits to the main cashier.

**Campus Response**

We concur.

a. A designated cashier is assigned one cash box for the duration of the event. The cashier is responsible for reconciling the cash box in the presence of the events supervisor and the events staff member responsible for distributing tickets.
b. A cash over/under log has been created and is reconciled to a specific cash shortage/overage account in the general ledger.

c. Personnel at the Center for Performing Arts were issued an additional endorsement stamp and asked to immediately endorse a check upon receipt.

d. The ticket sales price is printed on both the ticket and ticket stub of each ticket. After each event, the ticket stubs and cash are reconciled to the gate receipts.

e. All satellite cashiering will be entered into CashNet.

Estimated Completion Date: December 15, 2009

ACCOUNTS RECEIVABLE

Pursuit of delinquent third-party and student receivables required improvement.

We reviewed delinquent accounts receivable from the January 2009 aging report and found that:

- Third-party receivables were not aged correctly, as the due date for the items was based on the system entry date instead of the contract service provision date.

- The student receivables collection letters were not sent in 30-day intervals based on the system-generated reports, but were instead mailed in 30-day intervals after the last add/drop day for the related scholastic term or according to the housing fee schedule, resulting in an inconsistency with system-generated reports.

- The PeopleSoft Student Finance (PS SF) system did not allow for input of the actual due date for the receivables, which could be utilized for the mailing of 30-, 60-, and 90-day collection letters.

SAM §8776.6 states that each department will develop collection procedures that will assure prompt follow-up of accounts receivable. Further, the accounting office will send a sequence of three collection letters at 30-day intervals; if the collection letters are unsuccessful, an analysis should be prepared with additional collection efforts to include contracting with a collection agency.

The accounts receivable lead accountant stated that PS SF does not allow for the input of a due date for the receivable billings and that personnel compensate for this issue through an extensive monthly reconciliation that included reference to the differing dates written on the invoices. She further stated that staff based the collection of third-party receivables on the average payment time of government agency customers.
Inadequate control over accounts receivable increases the risk that receivables will not be properly controlled and reflected in campus financial statements, reduces the likelihood of collection, and negatively impacts cash flow.

**Recommendation 2**

We recommend that the campus:

a. Correctly age third-party receivables based on contract service provision dates.

b. Send student receivables collection letters in 30-day intervals based on the system-generated reports.

**Campus Response**

We concur.

a. The campus will investigate the delivered aging reports in Common Management Systems (CMS) baseline, and work closely with the chancellor’s office CMS support team in order to correctly generate aging reports for third-party receivables based on contract service provision dates.

b. Student receivables have a due date that is dependent upon the add/drop date for each term as listed in the Course Catalog. We will investigate to what extent regular 30-day interval collection letters can be mailed out based on consistent system-generated aging reports.

Estimated Completion Date: February 15, 2010

**PAYROLL**

Duties and responsibilities relating to payroll warrants were not properly segregated.

We found that payroll warrants that were not picked up by the employees were returned by customer service to the payroll department after 45 days.

State University Administrative Manual §3812 states that none of the personnel assigned to the payroll office and none of the staff authorized by the appointing power to prepare payroll transactions and certify attendance reports shall be authorized to receive and distribute salary warrants. The pay warrants must be received and distributed by an office physically apart from the payroll office.

SAM §8080 states, in part, that no one person will perform more than one of the following types of duties: initiating or preparing invoices, and comparing machine-signed checks with authorizations.
and supporting documents. It further states that checks will not be routed for mailing or distribution through the person who authorized the disbursement or prepared the check.

SAM §20050 states that the elements of a satisfactory system of internal accounting and administrative controls include a plan of organization that provides segregation of duties appropriate for proper safeguarding of state assets.

The managing director of payroll and benefits stated that they were operating in accordance with their campus policies which required that the payroll warrants be returned to the payroll department.

Inadequate segregation of duties over the handling of payroll warrants increases the risk of irregularities.

**Recommendation 3**

We recommend that the campus implement appropriate segregation of duties in the handling of payroll warrants.

**Campus Response**

We concur. A procedure has been developed to implement the appropriate segregation of duties in the handling of payroll warrants; any warrant that has not been picked up within 45 days by an employee will be sent from the customer services’ department to the cashier’s office for mailing to the employee.

**PROPERTY**

Property was not always properly valued and correctly identified, and laptop use forms were not always on file.

We found that:

- Six of twelve items of property reviewed were recorded at less than their actual amount, due to sales tax and/or environmental fees.
- The property inventory listing did not correctly identify the type of computers. The listing noted two of the laptops as desktop computers and one desktop computer as a laptop.
- Laptop use permits were not on file for 4 of the 18 laptops reviewed. This is a repeat finding from the prior Financial Integrity State Manager’s Accountability Act (FISMA) audit.
Sonoma State University *Equipment Management Guidelines* Section 4.1, states that the cost of equipment includes the purchase price plus all costs to acquire, install, and prepare equipment for its intended use.

SAM §8614 states that the cost of equipment includes the purchase price plus all costs to acquire, install, and prepare equipment for its intended use.

SAM §8600 states that property accounting procedures are designed to maintain uniform accountability for state property. These standard procedures are used to provide accurate records for the acquisition, maintenance, control, and disposition of property. The combination of accurate accounting records and strong internal controls must be in place to protect against and detect the unauthorized use of state property.

The assistant controller for financial reporting stated that the laptop use form requirement was implemented within the last year and that the inventory review to verify the use of the form was in progress. He also stated that the errors in the property listing were due to time constraints for the data entry.

Inadequate controls over physical assets increases the risk for loss and misuse.

**Recommendation 4**

We recommend that the campus:

a. Ensure that property is recorded at the proper amount and correctly identified in the inventory listing.

b. Enforce the use of laptop authorization forms for equipment that is taken off-site.

**Campus Response**

We concur.

a. The campus will use a multiplication factor to estimate the average of additional taxes and fees associated with non-capitalized equipment; this method will be limited to purchases of numerous items on a single invoice with various individual prices. Items approaching the capitalization threshold will be recorded at actual cost. Laptops will be clearly identified and distinguished from other computers in the inventory records.

b. Each laptop use permit will be examined during the annual departmental inventory process. Non-compliant departments will be reported on an annual basis to the respective vice president for further action.

Estimated Completion Date: February 15, 2010
# APPENDIX A:
PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Ruben Armiñana</td>
<td>President</td>
</tr>
<tr>
<td>Johana Beem</td>
<td>Cashier, Main Vault</td>
</tr>
<tr>
<td>Megan Catton</td>
<td>Ticket Office, Athletics</td>
</tr>
<tr>
<td>Leticia Coate</td>
<td>Associate Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Nancy Crosat</td>
<td>Administrative Analyst, Athletics</td>
</tr>
<tr>
<td>David Crozier</td>
<td>Assistant Controller, Financial Reporting</td>
</tr>
<tr>
<td>Peter Flores</td>
<td>CMS Security Administrator</td>
</tr>
<tr>
<td>Laurence Furukawa-Schlereth</td>
<td>Vice President, Administration and Finance/Chief Financial Officer</td>
</tr>
<tr>
<td>Mark Harlin</td>
<td>Property Management Specialist</td>
</tr>
<tr>
<td>John Hayes</td>
<td>University Controller</td>
</tr>
<tr>
<td>Rosa Hosseini</td>
<td>Administrative Assistant, Accounts Payable</td>
</tr>
<tr>
<td>Kurt Koehle</td>
<td>Director, Internal Operations Analysis and Review</td>
</tr>
<tr>
<td>Ruth McDonnell</td>
<td>Deputy Controller, Contracts, Procurement, and Accounts Payable</td>
</tr>
<tr>
<td>Gloria Ogg</td>
<td>Senior Director, University Business Services</td>
</tr>
<tr>
<td>Brian Orr</td>
<td>Internal Auditor</td>
</tr>
<tr>
<td>Jenny Parkinson</td>
<td>Box Office Coordinator, Center for Performing Arts</td>
</tr>
<tr>
<td>Janice Peterson</td>
<td>Senior Director, University Budget</td>
</tr>
<tr>
<td>Paul Santini</td>
<td>Deputy Controller, Student Finance</td>
</tr>
<tr>
<td>Nicholas Saschin</td>
<td>Accountant Administrator</td>
</tr>
<tr>
<td>Jean Snyder</td>
<td>Accounts Receivable, Lead Accountant</td>
</tr>
<tr>
<td>Mary Trimble</td>
<td>Lead Cashier</td>
</tr>
<tr>
<td>Michelle Van Fossen</td>
<td>Accounts Payable Operations Manager</td>
</tr>
<tr>
<td>Judy Vincenti</td>
<td>Accounts Receivable Accountant</td>
</tr>
<tr>
<td>Jason Weinrick</td>
<td>Senior Director, CMS</td>
</tr>
<tr>
<td>Deanna Wilson</td>
<td>Managing Director, Payroll and Benefits</td>
</tr>
<tr>
<td>Susan Zito</td>
<td>Manager, Payroll and Benefits</td>
</tr>
</tbody>
</table>
November 19, 2009

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, FISMA Audit Report No. 09-03

On behalf of President Arminiuna, I am submitting the Campus Response to the recommendations of Audit Report 09-03, FISMA 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.

Enclosures

c: President Ruben Arminiuna  
Letitia Coate, Associate Vice President for Administration and Finance  
Gloria Ogg, Senior Director for University Business Services  
Jason Wenrick, Senior Director, CMS  
John Hayes, University Controller  
Bill Fusco, Director of Athletics  
Deanna Wilson, Managing Director, Payroll and Benefits  
Brian Orr, Internal Auditor  
David Crozier, AssistantController, Financial Reporting  
Nicholas Saschin, Account Administrator  
Kurt Koehle, Director of Internal Operations
CASH RECEIPTS

Recommendation 1

We recommend that the campus:

a. Implement appropriate controls over cash to ensure accountability is localized to one individual at athletics.

b. Record cash overages and shortages in the accounting records for athletics and the CPA.

c. Endorse checks immediately upon receipt or at a minimum by the end of the day at the CPA.

d. Include the price on athletics event tickets sold and implement a process to verify and reconcile the ticket sales against the amount of cash received by the cashiers by the ticket sales price.

e. Include a detailed breakdown of cash receipts in CashNet for all satellite locations that transport deposits to the main cashier.

Campus Response

We concur.

a. A designated cashier is assigned one cash box for the duration of the event. The cashier is responsible for reconciling the cash box in the presence of the Events Supervisor and the Events staff member responsible for distributing tickets. [Completed]

b. A cash over/under log has been created and is reconciled to a specific cash shortage/overage account in the General Ledger. [Completed]

c. Personnel at the Center for Performing Arts were issued an additional endorsement stamp and asked to immediately endorse a check upon receipt. [Completed]

d. The ticket sales price is printed on both the ticket and ticket stub of each ticket. After each event, the ticket stubs and cash are reconciled to the gate receipts. [Completed]

e. All satellite cashiering will be entered into CashNet. [To be completed by December 15, 2009]
ACCOUNTS RECEIVABLE

Recommendation 2

We recommend that the campus:

a. Correctly age third-party receivables based on contract service provision dates.

b. Send student receivables collection letters in 30-day intervals based on the system-generated reports.

Campus Response

We concur.

a. The campus will investigate the delivered aging reports in CMS baseline, and work closely with the Chancellor’s Office CMS support team in order to correctly generate aging reports for third-party receivables based on contract service provision dates.

b. Student receivables have a due date that is dependent upon the add/drop date for each term as listed in the Course Catalog. We will investigate to what extent regular 30-day interval collection letters can be mailed out based on consistent system-generated aging reports.

[To be completed by February 15, 2010]

Recommendation 3

We recommend that the campus implement appropriate segregation of duties in the handling of payroll warrants.

Campus Response

We concur. A procedure has been developed to implement the appropriate segregation of duties in the handling of payroll warrants; any warrant not been picked up within 45 days by an employee will be sent from the Customer Services’ Department to the Cashier’s Office for mailing to the employee. [Completed]

PROPERTY

Recommendation 4

We recommend that the campus:

a. Ensure that property is recorded at the proper amount and correctly identified in the inventory listing.

b. Enforce the use of laptop authorization forms for equipment that is taken off-site.
Campus Response

We concur.

a. The campus will use a multiplication factor to estimate the average of additional taxes and fees associated with non-capitalized equipment; this method will be limited to purchases of numerous items on a single invoice with various individual prices. Items approaching the capitalization threshold will be recorded at actual cost. Laptops will be clearly identified and distinguished from other computers in the inventory records.

b. Each laptop use permit will be examined during the annual departmental inventory process. Non compliant departments will be reported on an annual basis to the respective Vice President for further action.

[To be completed by February 15, 2010]
December 11, 2009

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Charles B. Reed
      Chancellor

SUBJECT: Draft Final Report 09-03 on FISMA,
        Sonoma State University

In response to your memorandum of December 11, 2009, I accept the response
as submitted with the draft final report on FISMA, Sonoma State University.

CBR/amd