INTERNATIONAL PROGRAMS

CALIFORNIA STATE UNIVERSITY,
FULLERTON

Audit Report 12-53
November 19, 2012

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CONTENTS

Executive Summary ...................................................................................................................................... 1

Introduction ................................................................................................................................................... 3
  Background ............................................................................................................................................... 3
  Purpose ...................................................................................................................................................... 5
  Scope and Methodology ............................................................................................................................ 6

OBSERVATIONS, RECOMMENDATIONS,
AND CAMPUS RESPONSES

General Environment .................................................................................................................................... 7

Programs for International Students ............................................................................................................. 8
  Pre-Enrollment Orientations ..................................................................................................................... 8
  Foreign Degree Programs ........................................................................................................................... 9

Study-Abroad and Exchange Programs ...................................................................................................... 11
APPENDICES

APPENDIX A: Personnel Contacted
APPENDIX B: Campus Response
APPENDIX C: Chancellor’s Acceptance

ABBREVIATIONS

AA Academic Affairs
AVP Associate Vice President
CE Continuing Education
CFR Code of Federal Regulations
CO Chancellor’s Office
CSU California State University
EE Extended Education
EO Executive Order
HKU-SPACE School of Professional Education of The University of Hong Kong
IP International Programs
OGC Office of General Counsel
OUA Office of the University Auditor
UEE University Extended Education
UPS University Policy Statement
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor (OUA) during the last quarter of 2011, the Board of Trustees, at its January 2012 meeting, directed that International Programs be reviewed. The OUA had previously reviewed Off-Campus Activities in 2009.

We visited the California State University, Fullerton campus from July 30, 2012, through August 31, 2012, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant errors and irregularities if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: pre-enrollment orientations for international students, the administration of a foreign degree program, and pre-departure orientations for students participating in study-abroad and exchange programs. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls for international programs in effect as of August 31, 2012, 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 [7]

Campus policies addressing the administration of international programs needed improvement. For example, the campus had not developed a policy that fully considered the potential risks of a program that housed foreign students in private homes. In addition, the recently updated University Policy Statement 320.10, International Education Policy, did not include California State University policy requirements regarding student travel.

PROGRAMS FOR INTERNATIONAL STUDENTS [8]

The campus did not maintain evidence showing that international students had attended pre-enrollment orientations. In addition, administration of a campus foreign degree program needed improvement. For example, the campus did not have a written agreement for a post-graduate degree program with the School of Professional and Continuing Education of The University of Hong Kong (HKU-SPACE), approved by the president or his/her designee, that was dated between the expiration of the first amendment in August 2008 and the implementation of the current agreement in July 2011. In addition, the current agreement had not been signed by an HKU-SPACE official, nor had the campus maintained...
evidence that the current program agreement had been reviewed and approved by the Office of General Council at the chancellor’s office.

STUDY-ABROAD AND EXCHANGE PROGRAMS [11]

The campus did not maintain evidence showing that students participating in study-abroad programs had attended a pre-departure orientation.
INTRODUCTION

BACKGROUND

The Academic Council on International Programs, created by the Board of Trustees on July 9, 1969, as part of the Policy for the California State Colleges International Programs, promotes campus participation in international program policy development and ensures regular communication between campuses and the Office of International Programs at the chancellor’s office (CO). The council is composed of one faculty representative appointed by each of the 23 campuses in a procedure established by the local academic senate and four student members who each serve a one-year term.

California State University (CSU) policies that address the creation and proper administration of campus-based international programs include Executive Order (EO) 744, State Funded Campus Based Study Abroad Programs, and EO 745, Self-Support Campus Based Study Abroad Programs, dated June 7, 2000. Both EOs delegate authority to the campus presidents to establish study-abroad programs and provide broad curricula guidelines, and EO 745 makes the distinction that credit-bearing self-support programs are those that rely exclusively on non-state general funds and are administered by continuing education (CE) or extended education (EE).

Student exchange programs are authorized in EO 605, Delegation of Authority to Approve International Student Exchanges, Tuition Waivers for International Students, and Tuition Waivers for Nonresident U.S. Graduate Students, dated July 21, 1993. This policy outlines the campus presidents’ authority to initiate agreements with foreign institutions and allows the president to waive the tuition of the incoming foreign students if the agreement dictates that comparable expenses are waived or met by the foreign entity entering into the agreement. Coded memorandum Academic Affairs (AA) 2011-01, Campus Compliance with Study Abroad Programs, dated January 11, 2011, clarifies the campus responsibility to define the terms under which equivalence is maintained and directs campuses to maintain records documenting the reciprocity.

Access to Excellence, the strategic plan adopted by the CSU system in 2008, pledges to increase student access and success, meet state needs for economic and civic development, and sustain institutional excellence. As part of the plan, the CSU commits to enhancing opportunities for global awareness by building strong and effective international programs and supporting faculty work that internationalizes the curricula.

The accompanying Access to Excellence Accountability Plan includes broad commitments to support, encourage, and promote study-abroad programs and partnerships with international universities. It also sets forth plans to provide a clear policy framework governing international programs and the creation of international partnerships, as well as appropriate indicators and metrics to gauge the progress of the system and the individual campuses toward the globalization goal.

Other CSU policies address the risks involved with student and other participant travel. EO 1041, California State University Student Travel Policy, dated May 29, 2009; EO 1069, Risk Management and Public Safety, dated March 1, 2012; and EO 1051, CSU Use of Approved Waiver of Liability, dated September 1, 2010, include, among other things, guidelines for the selection of air or ground carriers for student travel, requirements for student travel-related insurance, and provisions for notifying participants of risks and obtaining waivers of liability.
Third-party providers also offer study-abroad opportunities to CSU students. The CO addresses proper due diligence in the selection of these vendors and examples of acceptable and unacceptable practices for individuals involved in that selection process in EO 1022, *Study Abroad through Non-CSU Providers*, dated September 24, 2007, and an accompanying coded memorandum, AA-2007-25, *Third Party Program Provider Study Abroad and Administrative Safeguards*, dated September 24, 2007. Additionally, institutions that issue forms allowing foreign students (both matriculating in the university and non-matriculating in CE or EE courses) to obtain the appropriate visas are subject to Department of Homeland Security, Immigration and Customs Enforcement, or Department of State regulations.

In 2010, the Office of the University Auditor conducted an audit of *Off-Campus Activities* at nine campuses and issued a systemwide report. The report noted issues related to participant documentation, execution and maintenance of program agreements, exchange reciprocity, and student travel. Several of the recommendations from the resulting systemwide report were incorporated into AA 2011-01 and EO 1051, *CSU Use of Approved Waiver of Liability*, dated September 1, 2010.
Purpose

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to international programs 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:

- Accountability for international programs has been clearly defined and documented, including delineation of roles and responsibilities, formulation of appropriate policies and procedures, and measurement of outcomes.

- The campus has established an adequate system for mitigating the risks in campus-based international programs.

- Study-abroad and exchange programs offered to students are selected, monitored, and administered according to CSU guidelines.

- Agreements with third-party providers of study-abroad and exchange programs and international student recruiters are investigated, reviewed, and approved according to CSU standards.

- Non-matriculating programs offered to international students meet regulatory and CSU requirements for scope, suitability, admissions, and administration.

- The campus is meeting the certification, programmatic, and record-keeping requirements of the Student and Exchange Visitor Program, Department of Homeland Security, and Department of State as a qualified institution for international students.

- Fiscal administration of international programs is in accordance with regulatory and CSU guidelines.

- Systems and applications administered by departments in charge of international programs are adequately controlled and secured, and access rights are granted on a need-to-know basis.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Action Item, Agenda Item 2 of the January 24 and 25, 2012, meeting of the Committee on Audit stated that International Programs includes a review of CSU students abroad and international students and visitors attending the CSU. Proposed audit scope would include, but was not limited to, review of program approvals, fiscal administration, and controls; risk management processes; curriculum and credit transfers; utilization of third-party providers; compliance with U.S. Department of State and other regulatory international travel requirements; and processes used to recruit international students, verify student credentials, and provide support on campus.

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 January 1, 2010, through June 1, 2012.

We focused primarily on the internal administrative, compliance, and operational controls over international programs. Specifically, we reviewed and tested:

- The development and maintenance of policies and procedures adequate to ensure compliance with CSU and regulatory requirements.
- Due diligence processes for study-abroad or exchange programs offered to students, both those established by the campus staff and those offered via third-party vendors.
- Methods by which the campus reviews student records to ensure that all required documentation, including emergency contacts and medical insurance, are obtained by and retained on the campus.
- Campus processes ensuring that outgoing study-abroad students and incoming foreign students participating in international programs are provided with crucial and required information at appropriate intervals.
- Procedures to ensure that the campus shows evidence of proper processing of foreign student visa form requirements.
- Budgets and financial records of self-support programs.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

Campus policies addressing the administration of international programs needed improvement.

Specifically, we found that the campus had not developed a policy that fully considered the potential risks of a program that housed foreign students in private homes. In addition, we noted that the recently updated University Policy Statement (UPS) 320.10, *International Education Policy*, did not include:

- California State University (CSU) policy requirements regarding student travel. Such requirements include, but are not limited to, student notification of travel risks, release of liability requirements, pre-departure orientations, student records retention practices, and provisions for obtaining travel and health insurance.

- Training and orientation requirements for faculty who want to develop collaborative partnerships with universities and institutions abroad, in order to ensure compliance with campus due diligence and approval policies.

Executive Order (EO) 1041, *California State Student Travel Policy*, dated July 1, 2009, states that all students participating in CSU-affiliated travel shall be required to acknowledge that they have been informed of the risks of travel and sign a statement that they have been informed of and undertake such travel voluntarily with full knowledge of such risks, and release and hold harmless the state of California, the CSU, and the campus, among others. It further states that students participating in CSU-sponsored air travel shall be required to purchase life and personal injury insurance in amounts stipulated by the chancellor.

EO 998, *Study Abroad Programs*, dated January 25, 2007, states that all CSU study-abroad programs must include a pre-departure orientation about the destination including health, safety, security, legal exposures or political restrictions, financial information, and CSU or campus policies for study abroad. It further states that students are required to carry medical insurance that will be valid in the host country(ies).

Coded Memorandum Academic Affairs (AA) 2011-1, *Campus Compliance with Study Abroad Policy*, dated January 11, 2011, states that maintenance of adequate documentation about the program and the participants includes student emergency contact information. It further states that the documents should be retained for three years.

EO 1051, *California State University Use of Approved Waiver of Liability*, dated September 1, 2010, in order to provide uniform and consistent application of risk control on all campuses in the CSU system, provides a standard waiver for use in all campus planned or sponsored events. This document is the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims.
State Administrative Manual §20050, *Internal Control*, states that the elements of a satisfactory system of internal accounting and administrative controls shall include an established system of practices to be followed in performance of duties and a system of authorization and recordkeeping procedures adequate to provide effective accounting control.

The dean of university extended education (UEE) and associate vice president (AVP) for international programs (IP) stated that the intent of the EOs was followed even though the policies were not specifically included in a UPS. He further stated that there have been several changes in leadership and organizational structure associated with international programs over recent years, which resulted in a non-centralized approach to maintaining certain policy.

Failure to maintain updated policies and procedures for the administration of international programs increases the risk of misunderstandings and potential legal liabilities.

**Recommendation 1**

We recommend that campus:

a. Develop a policy that fully considers the potential risks of a program that houses foreign students in private homes.

b. Review and update University Policy Statement 320.10, *International Education Policy*, to include CSU policy requirements regarding student travel and training and orientation requirements for faculty who want to develop collaborative partnerships with universities and institutions abroad.

**Campus Response**

We concur. University risk management will review the current campus homestay policy for any potential risks and revise the policy accordingly. In addition, University Policy Statement 320.102 will be reviewed to include CSU policy requirements related to student travel and training and orientation requirements for faculty.

Anticipated completion date is April 30, 2013.

**PROGRAMS FOR INTERNATIONAL STUDENTS**

**PRE-ENROLLMENT ORIENTATIONS**

The campus did not maintain evidence showing that international students had attended pre-enrollment orientations.

We reviewed visa documents for ten international students, and we found that none of the student files contained documentation showing that the students had attended the mandatory orientation.
Code of Federal Regulations (CFR), Title 22, Part 62, *Exchange Visitors*, §10(c), states that sponsors shall offer appropriate orientation for all exchange visitors.

22 CFR, Part 62, *Exchange Visitors*, §10(h) states that sponsors shall retain all records related to their exchange visitor program and exchange visitors for a minimum of three years.

Coded Memorandum AA 2011-1, *Campus Compliance with Study Abroad Policy*, dated January 11, 2011, states that campuses must maintain all agreements and other documentation for all study-abroad and exchange programs.

The director of the office of international education and exchange stated that all international students were informed of the mandatory pre-enrollment orientation upon their arrival; however, evidence of attendance was maintained on paper and discarded after one year.

Failure to maintain evidence that international students attended a pre-enrollment orientation increases the risk to the health and safety of campus participants and increases potential legal liabilities.

**Recommendation 2**

We recommend that the campus maintain evidence showing that international students have attended pre-enrollment orientation.

**Campus Response**

We concur. We will maintain sign-in sheets for mandatory participation in pre-enrollment orientation for international students, in both hard copy and electronic format, in the Office of International Education and Exchange.

Anticipated completion date is February 1, 2013.

**FOREIGN DEGREE PROGRAMS**

Administration of a campus foreign degree program needed improvement.

We reviewed the campus’ post-graduate degree program with the School of Professional and Continuing Education of The University of Hong Kong (HKU-SPACE), and we found that:

- The campus did not have a written agreement with HKU-SPACE, approved by the president or his/her designee, that was dated between the expiration of the first amendment in August 2008 and the implementation of the current agreement in July 2011. Also, the current agreement had not been signed by an HKU-SPACE official.

- The campus had not maintained evidence that the current program agreement had been reviewed and approved by the Office of General Council (OGC) at the chancellor’s office (CO).
The campus did not have a letter of appointment from the president to the director of the program, nor had it maintained evidence that it had consulted the U.S. Department of State, the U.S. Embassy, or the embassy in China while planning the program.

The campus had not established a charter for the academic committee described in the agreement with HKU-SPACE as having oversight of the program, nor could it provide evidence that the academic committee was monitoring the program on a routine and structured basis.

EO 795, *Procedures Governing Self-Supporting Programs Outside the State of California, Conducted Through the Continuing Education Revenue Fund or Local Trust Accounts*, dated November 12, 2001, states the following:

- The campus president is responsible for all out-of-state and out-of-country programs sponsored by the campus; any contracts related to out-of-state and out-of-county instructional programs must be reviewed and approved as to proper legal form by the OGC in the CO; and each out-of-state or out-of-county program shall have a director assigned by means of a letter of appointment issued by the campus president or president’s designee.

- Whenever an institution is considering the development of a program for delivery in a foreign country, the institution should take the following additional steps early in the planning process: contact the United States Department of State to advise appropriate personnel of campus intentions to seek advice; contact the United States Embassy (and/or Consulate) in the nation concerned; and contact the embassy of the nation concerned.

- The president of any campus offering out-of-state or out-of-county instructional programs shall establish procedures for their evaluation, review, and approval with respect to academic, contractual, faculty, fiscal, legal and logistical arrangements and commitments.

The dean of UEE and AVP for IP stated that some of the required processes probably did take place at the start of the program; however, the documents do not appear to have been retained in campus files.

Inconsistent authorization and administration of out-of-country instructional programs increases the risk of misunderstandings and potential legal liabilities.

**Recommendation 3**

We recommend that the campus:

a. Ensure that written agreements for all out-of-country instructional programs are properly completed, approved by the president or his/her designee, and signed by a program official.

b. Maintain evidence showing that written agreements for all out-of-country instructional programs were reviewed and approved by OGC at the CO.
c. Create a letter of appointment from the president to the director of the HKU-SPACE program, and maintain evidence of consultation with the U.S. Department of State, the U.S. Embassy, or the embassy in China regarding the HKU-SPACE program.

d. Establish a charter for the academic committee described in the HKU-SPACE program agreement as having oversight of the program, and maintain evidence that the academic committee is monitoring the program on a routine and structured basis.

Campus Response

We concur. University Policy Statement 320.102 will be updated to address the campus policy for approving written agreements for out-of-country instructional programs and EO 795 requirements regarding review and approval by OGC at the CO and appropriate consultation. We will also create a letter of appointment from the president to the director of the HKU-SPACE program and establish a charter for the academic committee to carry those responsibilities as described in the HKU-SPACE program agreement.

Anticipated completion date is April 30, 2013.

STUDY-ABROAD AND EXCHANGE PROGRAMS

The campus did not maintain evidence showing that students participating in study-abroad programs had attended a pre-departure orientation.

We reviewed 10 short-term study-abroad programs and five exchange programs and found that documentation of student attendance at pre-departure orientations had not been maintained for eight of the short-term study-abroad programs or any of the exchange programs.

EO 998, Study Abroad Programs, dated January 25, 2007, states that study-abroad programs must consider the health, safety, and security of students, staff, and faculty as a central feature of planning and operation. The policy further states that all CSU study-abroad programs must include a pre-departure orientation about the destination, including health, safety, security, legal exposures or political restrictions, financial information, and CSU or campus policies for study abroad.

The dean of UEE and AVP for IP stated that due to the decentralized nature of study-abroad programs, the campus did not have a way to maintain central records for each study-abroad program.

Failure to maintain evidence that study-abroad students attended a pre-departure orientation increases the risk to the health and safety of campus participants and increases potential legal liabilities.

Recommendation 4

We recommend that the campus maintain evidence showing that students participating in study-abroad programs have attended a pre-departure orientation.
Campus Response

We concur. We will develop a centralized system whereby all colleges that administer study-abroad programs will submit sign-in sheets to the Office of International Education and Exchange as evidence of student attendance at pre-departure orientation. The documentation will be maintained both in hard copy and electronic format.

Anticipated completion date is January 1, 2013.
## APPENDIX A:
## PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Mildred Garcia</td>
<td>President</td>
</tr>
<tr>
<td>William Barrett</td>
<td>Interim Vice President for Administration and Finance/Chief Financial Officer</td>
</tr>
<tr>
<td>John Beisner</td>
<td>Interim Associate Vice President Human Resources and Risk Management</td>
</tr>
<tr>
<td>Paulette Blumberg</td>
<td>Interim Associate Vice President for Administration and Finance</td>
</tr>
<tr>
<td>Jeffrey Brody</td>
<td>Professor of Communications</td>
</tr>
<tr>
<td>Steven Chan</td>
<td>Director of Budget, Finance and Student Services</td>
</tr>
<tr>
<td>Jessica Hammond</td>
<td>International Student Services Housing Coordinator</td>
</tr>
<tr>
<td>Jean Hotta</td>
<td>International Student Advisor</td>
</tr>
<tr>
<td>Lisa Kopecky</td>
<td>Assistant Vice President, Academic Operations and Finance</td>
</tr>
<tr>
<td>Tariq Marji</td>
<td>Chief Financial Officer, CSU Fullerton Auxiliary Services Corporation</td>
</tr>
<tr>
<td>Natalie Mir</td>
<td>SEVIS Assistant</td>
</tr>
<tr>
<td>Harry Norman</td>
<td>Dean of University Extended Education and Associate Vice President for International Programs</td>
</tr>
<tr>
<td>Diana Ruiz</td>
<td>Administrative Support Coordinator II</td>
</tr>
<tr>
<td>Lay Tuan Tan</td>
<td>Director, International Education and Exchange</td>
</tr>
<tr>
<td>Chris Vo</td>
<td>Administrative Support Coordinator</td>
</tr>
<tr>
<td>Sandy Wong</td>
<td>Administrative Manager to the Dean</td>
</tr>
<tr>
<td>Steven Yim</td>
<td>University Controller</td>
</tr>
</tbody>
</table>
December 17, 2012

Larry Mandel, University Auditor
Office of the University Auditor
The California State University
400 Golden Shore, Suite 210
Long Beach, CA 90802-4210

SUBJECT: Campus Responses to Recommendations of International Programs Audit, Report 12-53

Dear Mr. Mandel:

Please find enclosed California State University, Fullerton’s official response to the four (4) recommendations contained in the International Programs Audit, Report 12-53.

We would like to thank the University Auditor and his staff for conducting the audit in a professional manner and identifying areas where our procedures or internal controls could be strengthened. The campus is committed to addressing the issues identified in the audit report.

If you have any questions or require additional information, please contact Steven Yim, Controller, at (657) 278-4075 or syim@fullerton.edu.

Sincerely,

William C. Barrett
Interim Vice President for Administration & Finance/
Chief Financial Officer

Attachments

cc: Mildred Garcia, President
    John Beisner, Interim Associate Vice President, Human Resources and Risk Management
    Steven Chan, Director of Budget, Finance and Student Services
    Harry Norman, Dean of University Extended Education and Associated Vice President for International Programs
    Lisa Kopecky, Associate Vice President, Academic Operations and Finance
    Lay Tuan Tan, Director International Education and Exchange
    Steven Yim, Controller
INTERNATIONAL PROGRAMS
CALIFORNIA STATE UNIVERSITY, FULLERTON
Audit Report 12-53

GENERAL ENVIRONMENT

Recommendation 1

We recommend that campus:

a. Develop a policy that fully considers the potential risks of a program that houses foreign students in private homes.

b. Review and update University Policy Statement 320.102, International Education Policy, to include CSU policy requirements regarding student travel and training and orientation requirements for faculty who want to develop collaborative partnerships with universities and institutions abroad.

Campus Response

We concur. University Risk Management will review the current campus homestay policy for any potential risks and revise the policy accordingly. In addition, University Policy Statement 320.102 will be reviewed to include CSU policy requirements related to student travel and training and orientation requirements for faculty. Anticipated completion date is April 30, 2013.

PROGRAMS FOR INTERNATIONAL STUDENTS

PRE-ENROLLMENT ORIENTATIONS

Recommendation 2

We recommend that the campus maintain evidence showing that international students have attended pre-enrollment orientation.

Campus Response

We concur. We will maintain sign-in sheets for mandatory participation in pre-enrollment orientation for international students, both hard copy and electronic format, in the Office of International Education & Exchange. Anticipated completion date is February 1, 2013.
FOREIGN DEGREE PROGRAMS

Recommendation 3

We recommend that the campus:

a. Ensure that written agreements for all out-of-country instructional programs are properly completed, approved by the president or his/her designee, and signed by a program official.

b. Maintain evidence showing that written agreements for all out-of-country instructional programs were reviewed and approved by OGC at the CO.

c. Create a letter of appointment from the president to the director of the HKU-SPACE program, and maintain evidence of consultation with the U.S. Department of State, the U.S. Embassy, or the embassy in China regarding the HKU-SPACE program.

d. Establish a charter for the academic committee described in the HKU-SPACE program agreement as having oversight of the program, and maintain evidence that the academic committee is monitoring the program on a routine and structured basis.

Campus Response

We concur. University Policy Statement 320.102 will be updated to address the campus policy for approving written agreements for out-of-country instructional programs and E.O 795 requirements regarding review and approval by OGC at the CO and appropriate consultation. We will also create a letter of appointment from the president to the director of the HKU-SPACE program and establish a charter for the academic committee to carry those responsibilities as described in the HKU-SPACE program agreement. Anticipated completion date is April 30, 2013.

STUDY-ABROAD AND EXCHANGE PROGRAMS

Recommendation 4

We recommend that the campus maintain evidence showing that students participating in study-abroad programs have attended a pre-departure orientation.

Campus Response

We concur. We will develop a centralized system whereby all colleges, which administer study abroad programs, will submit sign-in sheets to the Office of International Education & Exchange as evidence of student attendance at pre-departure orientation. The documentation will be maintained both in hard copy and electronic format. Anticipated completion date is January 1, 2013.
January 16, 2013

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Timothy P. White
      Chancellor

SUBJECT: Draft Final Report 12-53 on International Programs,
         California State University, Fullerton

In response to your memorandum of January 16, 2013, I accept the response as
submitted with the draft final report on International Programs, California
State University, Fullerton.

TPW/amd