INTERNATIONAL PROGRAMS
SYSTEMWIDE

Audit Report 13-16
March 3, 2014

Members, Committee on Audit

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THE CALIFORNIA STATE UNIVERSITY
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ABBREVIATIONS

AA  Academic Affairs
BOT  Board of Trustees
CO   Chancellor’s Office
CSU  California State University
EO   Executive Order
GC   Government Code
OAAS Office of Audit and Advisory Services
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of Audit and Advisory Services (OAAS) during the last quarter of 2011, the Board of Trustees (BOT), at its January 2012 meeting, directed that International Programs be reviewed. Based on the results of the first cycle of these reviews and the systemwide risk assessment conducted by the OAAS in the last quarter of 2012, the BOT directed at its January 2013 meeting that the OAAS continue these reviews. The OAAS had previously reviewed portions of international programs in the Off-Campus Activities audit in 2009.

We visited twelve campuses from June 18, 2012, to June 14, 2013, and audited the procedures in effect at that time. Campus-specific findings and recommendations have been discussed and reported individually.

In our opinion, except for the effect of the weaknesses described below, the fiscal, operational, and administrative controls for international programs as of June 14, 2013, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of concern include: general environment and study-abroad and exchange programs.

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 CONTROL ENVIRONMENT [6]

Roles and responsibilities for chancellor’s office (CO) personnel involved in campus-based international activities had not been clearly defined. Also, the CO did not have an efficient process for the centralized collection and maintenance of real-time information regarding the location of and contact information for students, faculty, and staff traveling abroad. In addition, systemwide policies and procedures for international programs required clarification to address inconsistencies or common misinterpretations by campuses.

STUDY-ABROAD AND EXCHANGE PROGRAMS [10]

International programs were not always properly approved at nine of the 12 campuses visited. Also, campuses did not always comply with systemwide policies regarding third-party providers of international programs. In addition, campuses did not always comply with systemwide policies for exchange agreements. Also, nine of 12 campuses visited did not always maintain evidence showing that all students participating in study-abroad programs had attended a pre-departure orientation and that required topics were covered. Further, five of 12 campuses visited did not always maintain evidence showing that students participating in international programs signed the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims form.
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.

In December 2012, the CO issued three new executive orders (EO) that updated and augmented existing policies for the creation and proper administration of campus-based international programs.

EO 1080, International Agreements, dated December 6, 2012, establishes minimum requirements for campuses entering into agreements as a part of their international activity in state and self-support endeavors. Under the EO, only the campus president is authorized to sign an agreement in which the campus commits resources toward activities for international students, universities, or other people or entities doing business outside the United States. The EO also requires that all such agreements be reviewed and approved by the CO before the president signs them, and that international activities be managed centrally on the campus.

EO 1081, Study Abroad and Exchange Programs, dated December 6, 2012, supersedes several outdated EOs and establishes requirements for campuses to establish study-abroad and/or exchange programs as part of their international activities. EO 1081 delegates to the campus presidents the responsibility for the development, implementation, and oversight of international programs. The policy also describes the circumstances under which a campus president can waive tuition for an incoming foreign student and outlines requirements for use of non-CSU program providers for study abroad. The policy also reiterates that all exchange and/or study-abroad agreements are subject to the review and approval requirements of EO 1080.

EO 1082, International Students, dated December 6, 2012, establishes requirements for campuses enrolling nonresident international students as part of their international activities. The policy addresses confirmation of proper visa status and the campuses’ responsibility to provide full-time course study in accordance with visa requirements; the establishment of adequate student services for international students and procedures to ensure the students obtain proper health insurance coverage; and acceptable evidence of English language competency. The policy also addresses international student recruitment, including the use of agents or other outside parties.

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 international 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.

Technical letters related to international programs include coded memorandum Academic Affairs (AA) 2007-25, *Third Party Program Provider Study Abroad and Administrative Safeguards*, dated September 24, 2007, which clarifies prohibited and acceptable activities related to the use of study-abroad program providers; and AA-2011-01, *Campus Compliance with Study Abroad Programs*, dated January 11, 2011, which clarifies the campus responsibility to define the terms in which value equivalence is achieved in exchange programs with foreign universities. Additionally, institutions that issue forms allowing foreign students (both matriculating and non-matriculating) in continuing education or extended education 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 Audit and Advisory Services 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 22 and 23, 2013, meeting of the Committee on Audit stated that International Programs includes a review of CSU students participating in instructional programs abroad and international students and visitors attending the CSU. Proposed audit scope would include, but was not limited to, review of program administration and approvals, fiscal administration, and controls; risk management processes; 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.

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 fiscal, operational, 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 14, 2013.

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.

During the course of the audit, we visited 12 campuses: Chico, Fullerton, Humboldt, Long Beach, Los Angeles, Northridge, Sacramento, San Bernardino, San Diego, San Francisco, Sonoma, and Stanislaus. We interviewed campus personnel and audited procedures in effect at the time of the audit.
OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

GENERAL CONTROL ENVIRONMENT

ROLES AND RESPONSIBILITIES

Roles and responsibilities for chancellor’s office (CO) personnel involved in campus-based international activities had not been clearly defined.

We found that although systemwide policies clearly delegated responsibility for campus-based international programs to the campus presidents, various CO departments (including Academic Affairs, the Office of Risk Management and Public Safety, and the Office of the General Counsel) retained critical functions in areas such as policy formation, risk management at the program and student levels, contract review, and information gathering. However, based on discussions with campus constituents and CO staff, we also found that despite some additions to newly adopted policies, the roles of the CO departments were not always clear, including the level of authority the departments retained in regard to campus-based international programs.

Executive Order (EO) 1081, Study Abroad and Exchange Programs, dated December 6, 2012, states that the president of each campus is delegated the responsibility for the development, implementation, and oversight of international programs in accordance with existing California State University (CSU) policy. It further states that all CSU study-abroad programs (including when CSU students participate in an exchange or in a third-party program) must consider the health, safety, and security of students, staff, and faculty as a central feature of planning and operation.

Government Code (GC) §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

The state university dean and director of international and summer programs stated that recent revisions to the EOs related to international programs and changes in management responsibilities at the CO contributed to some confusion on the campuses about the roles of the various CO departments.

The lack of clearly defined roles and responsibilities for CO personnel involved in functions related to campus-based international programs exposes the system to risks related to inefficiencies, including delays in information dissemination, policy implementation, and decision-making.

Recommendation 1

We recommend that the CO clearly define the roles and responsibilities for CO personnel involved in campus-based international programs.
Management Response

We concur. The CO will define the roles and responsibilities for CO personnel involved in campus-based international programs.

This recommendation will be implemented by October 2014.

CENTRALIZED INFORMATION ON PARTICIPANTS

The CO did not have an efficient process for the centralized collection and maintenance of real-time information regarding the location of and contact information for students, faculty, and staff traveling abroad.

We found that although policies directed the campuses to retain specific information on study-abroad participants, we were unable to determine how the CSU as a whole would determine its exposure if an adverse world event were to occur, and how the system would gather critical information on these exposures for purposes of emergency contact, risk management implementation, and executive reporting. Though the primary point of contact in an adverse world situation would be the campuses, a system to capture the information on a systemwide basis would facilitate the determination of systemwide exposure and appropriate emergency actions in such an event.

EO 1081, Study Abroad and Exchange Programs, dated December 6, 2012, states that all CSU study-abroad programs (including when CSU students participate in an exchange or in a third-party program) must consider the health, safety, and security of students, staff, and faculty as a central feature of planning and operation. It further states that campuses must maintain basic student information for participants, including name, contact information, insurance information, date of birth, student ID number, and major.

GC §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

The state university dean and director of international and summer programs stated that there had not been a mandate for comprehensive collection of data from all campuses, but the Office of Risk Management and Public Safety had access to most information through its travel insurance programs. He further stated that the revisions to the EOs related to international programs and changes in management responsibilities at the CO contributed to a delay in identifying and implementing a method to track program and student activity on a real-time basis.

The inability to centrally track information on international program participants exposes the system to the risk of delayed response to adverse world events, the increased likelihood of injury to participants, and potential legal liabilities.
Recommendation 2

We recommend that the CO develop and implement an effective process for the centralized collection and maintenance of real-time information on the location and contact information for students, faculty, and staff traveling abroad.

Management Response

We concur. The CO will establish an effective process to maintain current information on the location and contact information for students, faculty, and staff traveling abroad.

This recommendation will be implemented by October 2014.

POLICIES AND PROCEDURES

Systemwide policies and procedures for international programs required clarification to address inconsistencies or common misinterpretations by campuses.

We found that the CO significantly revised policies regarding international programs during 2012 and 2013, including the issuance of three new EOs covering international agreements, study-abroad and exchange programs, and international students. In addition, several coded memoranda addressing risk management and approval of travel to high-hazard or travel-warning countries were also revised. Significant changes included:

- Recommendations to campuses to engage Academic Affairs, the Office of General Counsel, and the Office of Risk Management and Public Safety at the CO regarding certain issues related to international programs.
- A requirement that only the president can sign international agreements, and only after the agreement has been approved by the CO.
- A shift of responsibility from the chancellor to the executive vice chancellor/chief financial officer regarding review and approval of travel to high-hazard and travel-warning regions.

However, based on our review and observations at the campuses, we also found that the following areas required clarification:

- All three of the new EOs required campuses to centralize the administration of international programs, but it was unclear how campuses were to implement this requirement. Nearly all of the campuses we reviewed had distributed responsibility for the administration of international programs, usually based on the party(s) initiating the activity, and two campuses were cited for not having effective means for consolidating information on all international programs.
- The definition of a “program provider” was unclear, as it only covered “an organization that sponsors instructional programs abroad that are open to students from colleges and universities” and did not address other models for providing international activities, including those that...
specialize in non-academic services such as travel arrangements, accommodations, and extra-curricular activities in foreign countries. During our campus reviews, we found numerous instances in which it appeared that a contract with an international vendor should have been subject to additional review and approval parameters, but because of the unclear “program provider” definition, the relationship was formed absent the additional controls in place for international programs.

EO 1081, Study Abroad and Exchange Programs, dated December 6, 2012, states that international activities should be connected to the university mission, and this connection should be understood and coordinated among all of the university’s stakeholders. It further states that international activities shall be overseen centrally on the campus to ensure that: (i) there is a clear benefit to the CSU; (ii) they are a part of the university’s overall mission to educate the citizens of California; and (iii) all study abroad/exchange programs are being implemented and monitored consistently.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

The state university dean and director of international and summer programs stated that the definition for centralization was left broad but was intended to ensure that one individual on the campus was aware of all international programs activities. He further stated that the term “program provider” would include any entity providing academic support services as part of a study-abroad program, but that certain situations are unique to each campus and should be addressed individually when they do not fit the normal academic mold.

Lack of clarity in policies guiding international programs exposes the campuses to misunderstandings, inconsistencies in compliance, and undue risk exposures.

**Recommendation 3**

We recommend that the CO clarify systemwide policies and procedures for international programs to address the inconsistencies and common misinterpretations by campuses noted above.

**Management Response**

We concur. The CO will clarify systemwide policies and procedures for international programs as required.

This recommendation will be implemented by October 2014.
STUDY-ABROAD AND EXCHANGE PROGRAMS

INTERNATIONAL PROGRAM APPROVAL

International programs were not always properly approved at nine of the 12 campuses visited.

We noted that:

- Seven campuses did not always obtain proper approval for study-abroad programs.
- Three campuses did not obtain proper approval for exchange programs.
- Five campuses did not obtain proper approval for third-party study-abroad programs.

EO 1080, *International Agreements*, dated December 6, 2012, states that the president of each campus is delegated the responsibility for the development, implementation, and oversight of international activity. It further states that all international agreements must be signed by the campus president and that this authority may not be delegated further. Also, the EO states that an international agreement involves an agreement with a partner where CSU makes a commitment of resources to engage in activities with international students, universities, or other persons or entities doing business outside of the United States.

Coded memorandum Academic Affairs (AA) 2007-25, *Third-Party Program Provider Study Abroad and Administrative Safeguards*, dated September 26, 2007, states that approval of third-party study-abroad provider programs and agreements should be signed by the president or a designee.

Management at three of the campuses stated that they had not obtained presidential approval for some programs because their interpretation of the definitions excluded these particular programs. Management at the other campuses stated their belief that their approval processes, which did not require presidential approval, were adequate based on their own campus policies and delegations.

Inadequate approval of study-abroad programs increases the risk of misunderstandings and potential legal liabilities.

**Recommendation 4**

We recommend that the CO remind campuses of the importance of obtaining proper approval for all international programs.

**Management Response**

We concur. The CO will ensure campuses are aware of approval processes for international programs.

This recommendation will be implemented by October 2014.
ADMINISTRATION OF THIRD-PARTY PROVIDERS

Campuses did not always comply with systemwide policies regarding third-party providers of international programs.

We found that:

- Six campuses did not comply with policies designed to ensure appropriate due diligence for the selection of third-party providers, including requirements to establish written criteria for vendor selection and maintain a list of approved vendors that documents how each one met the vendor selection criteria.

- Four campuses were accepting some form of compensation that was directly related to the number of students recruited into a third-party program.

- On two campuses, an individual was participating in activities with the provider that may have or did constitute a conflict of interest.

EO 1081, Study Abroad and Exchange Programs, dated December 6, 2012, states that each campus will have a written process for approving study-abroad program providers and for deciding on whether to enter an agreement with a provider. It further states that neither a CSU campus nor any employee or agent of a CSU campus shall accept payments or benefits in exchange for being an approved program or recommending the program to students.

Coded memorandum AA 2007-25, Third-Party Program Provider Study Abroad and Administrative Safeguards, dated September 26, 2007, states that the selection of third-party study-abroad program providers shall provide for a systematic consideration, according to uniform criteria and consistent information, of the potential benefits for students, as well as the quality of service provided to students and the campus, and that campuses are encouraged to consult broadly with faculty, administration, and relevant campus committees in considering a program for approval. It also advises campuses to maintain a list of approved third-party-provided study-abroad programs that clearly states all criteria used in deciding to include those programs on the approved list. It further states that the criteria should include program offerings, student support services, program destination and curricular focus, and risk management issues, and that the campus should make appropriate updates to the information on the list on an annual basis.

The CSU Conflict of Interest Handbook, dated February 2013, states that under the Political Reform Act of 1974, no CSU employee shall make, participate in making, or attempt to use his or her official position to influence a CSU decision in which he or she has a financial interest. It further states that the restrictions of this act apply to all CSU employees, without regard to whether they are required to file an annual conflict-of-interest form.

Management at three of the campuses that did not comply with due diligence policies stated that due diligence had taken place but had not been formalized in writing. Also, management at two of the campuses stated that they felt that the programs in question did not fit into the definition for the cited policy. In addition, management at three of the campuses stated their belief that taking compensation
from third-party providers was acceptable due either to the nature of the relationship with the provider or because the campus incurred real costs in the relationship with the provider. Further, management at one campus with a conflict-of-interest situation with a provider stated that it was unaware of the relationship until the audit, and management at the other campus stated its belief that the situation in question was acceptable because the relationship was termed a consortium.

Inadequate due diligence for international program providers increases the risk of misunderstandings and potential legal liabilities, and a lack of transparency regarding relationships with service providers exposes the campus and the CSU to financial and reputational risk.

**Recommendation 5**

We recommend that the CO remind the campuses of the importance of complying with systemwide policies regarding third-party providers of international programs.

**Management Response**

We concur. The CO will ensure that campuses are aware of policies regarding third-party providers of international programs.

This recommendation will be implemented by October 2014.

**ADMINISTRATION OF EXCHANGE PROGRAMS**

Campuses did not always comply with systemwide policies for exchange agreements.

We found that:

- Five campuses executed exchange agreements that did not clearly outline the tuition terms and the manner in which comparable expenses would be defined and measured between the campus and the foreign university.

- Five campuses either did not measure or were out of balance with regard to the comparable expense measurements between the campus and the foreign university.

- Three campuses continued to exchange students with foreign universities even though the exchange agreement had expired.

EO 1081, *Study Abroad and Exchange Programs*, dated December 6, 2012, states that campus presidents may waive non-resident tuition fees for foreign students attending a campus of the CSU if the agreement provides that comparable expenses are paid or waived by the foreign entity entering into the agreement. It further clarifies that comparable expenses can be provided in the form of matching tuition waivers at foreign educational institutions, provision of services, or a combination thereof. The EO also states that exchanges must balance over a documented period of time not longer than the term of the agreement, and that campuses must maintain documentation on the balance of incoming and outgoing students participating in the exchange.
Coded memorandum AA 2011-1, *Campus Compliance with Study Abroad Policy*, dated January 11, 2011, states that campuses should maintain documentation and perform regular reviews of exchange reciprocity balances.

Integrated California State University Administrative Manual §5233, *Risk Allocation and Performance Assurance*, dated April 20, 2004, states that contracts should be formed to ensure the fair and reasonable allocation of risk and to assure satisfactory performance by the contractor, and that requirements for successful contract performance should be clearly defined within the contract documents.

Management at the campuses stated various reasons for the exchange agreement issues; three indicated that they had postponed updating expired or problematic agreements due to time constraints or the knowledge that systemwide policies were in the process of changing, and two indicated that they had difficulties maintaining exchange balances because of variations in students’ interest in certain programs.

Inadequate administration of agreements with exchange partners increases the risk of misunderstandings and potential legal liabilities, and inequality in value-received reciprocity with exchange partners undermines the intent of the agreements and results in a financial imbalance between partners.

**Recommendation 6**

We recommend that the CO remind the campuses of the importance of complying with systemwide policies for exchange agreements.

**Management Response**

We concur. The CO will ensure that campuses are aware of systemwide policies for exchange agreements.

This recommendation will be implemented by October 2014.

**PRE-DEPARTURE ORIENTATIONS**

Nine of 12 campuses visited did not always maintain evidence showing that all students participating in study-abroad programs had attended a pre-departure orientation and that required topics were covered.

**EO 1081, Study Abroad and Exchange Programs**, dated December 6, 2012, states that all CSU study-abroad programs, including exchange and third-party programs, will provide participants with a pre-departure orientation about the destination covering topics such as health, safety, security, specific legal exposure, or political restrictions related to their status in the country; CSU or campus policies and procedures for study abroad; and financial information.
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.

Management at the campuses stated various reasons for the lack of documentation regarding student orientation. Some stated that the distributed model for delivery of international programs contributed to the differences in oversight methods for documenting orientation meetings; others stated their belief that their orientation record-keeping procedures were sufficient given the size and organization of their international programs.

Lack of 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, and inadequate maintenance of orientation materials increases the risk that important information will not be completely or consistently communicated to students.

**Recommendation 7**

We recommend that the CO remind the campuses of the importance of maintaining evidence showing that all students participating in study-abroad programs have attended a pre-departure orientation and that required topics were covered.

**Management Response**

We concur. The CO will ensure that campuses are aware of the importance of maintaining evidence showing that all students participating in study-abroad programs have attended a pre-departure orientation and that required topics were covered.

This recommendation will be implemented by October 2014.

**STUDENT PARTICIPANT DOCUMENTATION**

Five of 12 campuses visited did not always maintain evidence showing that students participating in international programs signed the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims form.

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.

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 to 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.
Coded memorandum AA 2011-1, *Campus Compliance with Study Abroad Policy*, dated January 11, 2011, states that campuses shall maintain adequate documentation for student participants in study-abroad programs, including basic student information, proof of required medical and/or flight insurance, and required liability releases. It further states that the documentation shall be retained for three years.

Management at four campuses stated their belief that the forms were likely collected, but were misplaced due to confusion or significant transitions in the roles and responsibilities of the employees charged with maintaining the documents. Management at the remaining campus stated that they had originally thought the hold harmless form provided by the sole third-party provider used for campus programs was sufficient.

Inadequate administration of risk management documentation exposes the system to liability due to misunderstandings of risks and responsibilities.

**Recommendation 8**

We recommend that the CO remind the campuses of the importance of maintaining evidence showing that students participating in international programs signed the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims form.

**Management Response**

We concur. The CO will ensure that campuses are aware of the importance of maintaining evidence showing that students participating in international programs signed the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims form.

This recommendation will be implemented by October 2014.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td><strong>Office of the Chancellor</strong></td>
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</tr>
<tr>
<td>Ephraim P. Smith</td>
<td>Executive Vice Chancellor and Chief Academic Officer</td>
</tr>
<tr>
<td>Benjamin F. Quillian</td>
<td>Executive Vice Chancellor and Chief Financial Officer (At time of review)</td>
</tr>
<tr>
<td>Sally Roush</td>
<td>Interim Vice Chancellor for Business and Finance (At time of review)</td>
</tr>
<tr>
<td>Gale S. Baker</td>
<td>Attorney, Office of General Counsel</td>
</tr>
<tr>
<td>Robert Eaton</td>
<td>Acting Assistant Vice Chancellor, Financing and Treasury and Risk Management</td>
</tr>
<tr>
<td>Leora D. Freedman</td>
<td>Attorney, Office of General Counsel</td>
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<td>Zachary Gifford</td>
<td>Associate Director, Systemwide Risk Management and Public Safety</td>
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<tr>
<td>Christine Mallon</td>
<td>Assistant Vice Chancellor, Academic Affairs</td>
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<tr>
<td>Charlene Minnick</td>
<td>Assistant Vice Chancellor, Risk Management and Public Safety (At time of review)</td>
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<tr>
<td>Steve Raskovich</td>
<td>Attorney, Office of General Counsel</td>
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<tr>
<td>Michael Redmond</td>
<td>Acting Assistant Vice Chancellor, Headquarters Building Security and Strategic Initiatives</td>
</tr>
<tr>
<td>Carrie Hemphill Reith</td>
<td>Attorney, Office of General Counsel</td>
</tr>
<tr>
<td>Sheila Thomas</td>
<td>State University Dean, Extended Education</td>
</tr>
<tr>
<td>Leo Van Cleve</td>
<td>State University Dean and Director, International and Summer Programs</td>
</tr>
<tr>
<td>Ron Vogel</td>
<td>Associate Vice Chancellor, Academic Affairs</td>
</tr>
<tr>
<td><strong>California State University, Chico</strong></td>
<td></td>
</tr>
<tr>
<td>Paul J. Zingg</td>
<td>President</td>
</tr>
<tr>
<td>Sharyn Abernatha</td>
<td>Assistant Vice President for Staff Human Resources</td>
</tr>
<tr>
<td>Debra Barger</td>
<td>Dean of the Center for Regional and Continuing Education</td>
</tr>
<tr>
<td>Stacie Corona</td>
<td>Associate Vice President for Financial Services and University Budget</td>
</tr>
<tr>
<td>William Dantona</td>
<td>Director, American Language and Culture Institute</td>
</tr>
<tr>
<td>Georgia Fox</td>
<td>Professor, Anthropology</td>
</tr>
<tr>
<td>Dane Frazier</td>
<td>Information Technology Manager</td>
</tr>
<tr>
<td>Beverly Gentry</td>
<td>Manager for Professional Development</td>
</tr>
<tr>
<td>Jennifer Gruber</td>
<td>Interim Coordinator, Study Abroad and International Exchange</td>
</tr>
<tr>
<td>Lorraine Hoffman</td>
<td>Vice President for Business and Finance</td>
</tr>
<tr>
<td>Jeni Kitchell</td>
<td>Director of University Budget and Resource Management</td>
</tr>
<tr>
<td>Frank Li</td>
<td>Director of the Office of International Education</td>
</tr>
<tr>
<td>William Loker</td>
<td>Dean of Undergraduate Education</td>
</tr>
<tr>
<td>James Luyirika-Sewagudde</td>
<td>National Student Exchange Program Coordinator</td>
</tr>
<tr>
<td>Clare Roby</td>
<td>Associate Dean</td>
</tr>
<tr>
<td>Mike Thorpe</td>
<td>Risk Manager</td>
</tr>
<tr>
<td>Belle Wei</td>
<td>Provost/Vice President for Academic Affairs</td>
</tr>
</tbody>
</table>
APPENDIX A: PERSONNEL CONTACTED

California State University, Fullerton
Mildred Garcia President
William Barrett Interim Vice President for Administration and Finance/Chief Financial Officer (At time of review)
John Beisner Interim Associate Vice President Human Resources and Risk Management
Paulette Blumberg Interim Associate Vice President for Administration and Finance
Jeffrey Brody Professor of Communications
Steven Chan Director of Budget, Finance and Student Services
Jessica Hammond International Student Services Housing Coordinator
Jean Hotta International Student Advisor
Danny Kim Interim Vice President, Administration and Finance/Chief Financial Officer
Lisa Kopecky Assistant Vice President, Academic Operations and Finance
Tariq Marji Chief Financial Officer, CSU Fullerton Auxiliary Services Corporation
Natalie Mir SEVIS Assistant
Harry Norman Dean of University Extended Education and Associate Vice President for International Programs
Diana Ruiz Administrative Support Coordinator II
Lay Tuan Tan Director, International Education and Exchange
Chris Vo Administrative Support Coordinator
Sandy Wong Administrative Manager to the Dean
Steven Yim University Controller

Humboldt State University
Rollin C. Richmond President
Rebecca Brown Director, Center for International Programs (CIP)
Emily Kirsch International Marketing and Recruitment Coordinator, CIP
Emily Kupec Financial Analyst, Reporting Analysis
Joyce Lopes Vice President, Administration and Finance
Carol Lorentzen Associate Vice President of Business Services
Megan Mefford Coordinator of International Admission, Immigration, and Advising, CIP
Lynne Sandstrom Director, Financial Services
Sharon Seward Fiscal Specialist, CIP
Penelope Shaw Coordinator, Study-Abroad Programs, CIP
Robert Snyder Provost and Vice President for Academic Affairs

California State University, Long Beach
Donald J. Para Interim President
F. King Alexander President (At time of review)
Tammy Guzman International Student Advisor, International Student Services, College of Continuing and Professional Education (CCPE)
Michael R. Jones Senior Director, Finance and Business Services, CCPE
Jeet Joshee Associate Vice President for International Education/Dean of CCPE
Emiko Kawashima Director, International Recruitment, CCPE
Melissa K. Lyon Director, International Student Services, CCPE
### California State University, Long Beach (cont.)

<table>
<thead>
<tr>
<th>Name</th>
<th>Title and Department</th>
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</thead>
<tbody>
<tr>
<td>Kelly Martinez</td>
<td>Education Abroad Advisor, Center for International Education, CCPE</td>
</tr>
<tr>
<td>Sharon L. Olson</td>
<td>Director, Education Abroad, CCPE</td>
</tr>
<tr>
<td>Jennifer Orem</td>
<td>Education Abroad Advisor, Center for International Education, CCPE</td>
</tr>
<tr>
<td>Lynne Richmond</td>
<td>Director, American Language Institute, CCPE</td>
</tr>
<tr>
<td>Aysu Spruill</td>
<td>Director of Internal Audit/Information Security Officer</td>
</tr>
<tr>
<td>Mary Stephens</td>
<td>Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Stephanie Williams</td>
<td>Risk Manager, Risk Management</td>
</tr>
</tbody>
</table>

### California State University, Los Angeles

<table>
<thead>
<tr>
<th>Name</th>
<th>Title and Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>William A. Covino</td>
<td>President</td>
</tr>
<tr>
<td>James M. Rosser</td>
<td>President (At time of review)</td>
</tr>
<tr>
<td>Kevin Brady</td>
<td>Director, Risk Management and Environmental Health and Safety</td>
</tr>
<tr>
<td>Justin Cassity</td>
<td>Assistant Dean, College of Extended Studies and International Programs (CESIP)</td>
</tr>
<tr>
<td>Lisa Chavez</td>
<td>Vice President, Administration and Finance/Chief Financial Officer</td>
</tr>
<tr>
<td>Jose Galvan</td>
<td>Dean, CESIP</td>
</tr>
<tr>
<td>Tanya Ho</td>
<td>University Internal Auditor</td>
</tr>
<tr>
<td>Christopher Lam</td>
<td>Resource Manager, CESIP</td>
</tr>
<tr>
<td>Aaron Ostrom</td>
<td>Director, English Language Program, CESIP</td>
</tr>
<tr>
<td>Salvador Rodriguez</td>
<td>Senior Internal Auditor</td>
</tr>
<tr>
<td>Amy Wang</td>
<td>Director, International Office, CESIP</td>
</tr>
</tbody>
</table>

### California State University, Northridge

<table>
<thead>
<tr>
<th>Name</th>
<th>Title and Department</th>
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<tbody>
<tr>
<td>Dianne F. Harrison</td>
<td>President</td>
</tr>
<tr>
<td>Elizabeth Adams</td>
<td>Senior Director of Undergraduate Studies</td>
</tr>
<tr>
<td>Kamiran Badrkhan</td>
<td>Deputy Dean of International Programs, Tseng College of Extended Learning</td>
</tr>
<tr>
<td>Cathy Costin</td>
<td>Anthropology Department Chair</td>
</tr>
<tr>
<td>Colin Donahue</td>
<td>Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Deborah Flugum</td>
<td>Manager, Purchasing and Contract Administration</td>
</tr>
<tr>
<td>David Gray</td>
<td>Professor of Biology</td>
</tr>
<tr>
<td>Marta Lopez</td>
<td>Assistant Director for International Programs</td>
</tr>
<tr>
<td>Howard Lutwak</td>
<td>Director of Internal Audit</td>
</tr>
<tr>
<td>Thomas McCarron</td>
<td>Vice President for Administration and Finance (At time of review)</td>
</tr>
<tr>
<td>Jody Myers</td>
<td>Professor of Religious Studies</td>
</tr>
<tr>
<td>Thomas Piernik</td>
<td>Director of Student Development and International Programs</td>
</tr>
<tr>
<td>Cynthia Rawitch</td>
<td>Vice Provost</td>
</tr>
<tr>
<td>Shelley Ruelas</td>
<td>Associate Vice President for Student Life</td>
</tr>
<tr>
<td>Justine Zhixin Su</td>
<td>Coordinator of International Programs</td>
</tr>
<tr>
<td>Nate Thomas</td>
<td>Professor of Film Production</td>
</tr>
<tr>
<td>Jody Van Leuven</td>
<td>Risk Manager</td>
</tr>
<tr>
<td>William Watkins</td>
<td>Vice President for Student Affairs</td>
</tr>
<tr>
<td>Elizabeth Whirledge</td>
<td>Manager of Academic Resources</td>
</tr>
<tr>
<td>Lih Wu</td>
<td>Executive Director of Business Operations and Finance, Tseng College of Extended Learning</td>
</tr>
</tbody>
</table>
APPENDIX A: PERSONNEL CONTACTED

**California State University, Sacramento**

- Alexander Gonzalez, President
- Peter Baird, Associate Professor, Bilingual Multicultural Education Department
- Edward Baranowski, Professor, Foreign Languages Department
- Karyl Burwell, Budget, Project and Personnel Analyst, Student Affairs
- Tracey Culbertson, Coordinator of International Students and Scholars, Office of Global Education (OGE)
- Felice Dinsfriend, Budget Analyst, College of Continuing Education (CCE)
- Jack Godwin, Chief International Officer and Director, Global Education
- Charles Gossett, Interim Provost, Academic Affairs
- Yavette Hayward, Senior Management Auditor
- Margaret Hwang, Program Manager, CCE
- Guido Krickx, Dean, CCE
- Monica Lam, Associate Dean, College of Business Administration, Graduate and External Programs
- Chris Lee, Senior Director for Operations and Business Affairs, CCE
- Ming-Tung “Mike” Lee, Vice President for Administration and Business Affairs/Chief Financial Officer
- Jill Matsueda, Academic Programs Director, CCE
- Lori May, Senior Program Coordinator, CCE
- Eric Merchant, Associate Director, Global Education
- Kaye Milburn, Director, Auditing Services
- Edward Mills, Associate Vice President for Enrollment Management, Student Affairs
- Jill Peterson, University Counsel
- Janis Silvers, Coordinator of Study Abroad, OGE
- Kirtland Stout, Director of Risk Management and Business Continuity Planning, Risk Management Services
- Suzanne Swartz, Contract Administrator, Procurement and Contract Services
- Donald Taylor, Interim Assistant Vice President, Academic Programs and Global Engagement, Academic Affairs
- Katie Walker, Coordinator of International Programs, CCE
- Janie Xiong, Risk Management Analyst, Risk Management Services

**California State University, San Bernardino**

- Tomás D. Morales, President
- Paul Amaya, Director of the Center for International Studies and Programs
- Dayna Brown, Confidential Administrative Support
- Deborah Burns, Assistant Vice President for Auxiliary and Business Services and Risk Management
- Deirdre Caruthers, Director of the College of Extended Learning
- Rueyling Chuang, Faculty Director of the Center for International Studies and Programs
- Matias Farre, Assistant Director of Accounting
- Robert Gardner, Vice President for Administration and Finance
- Kathy Hansen, Director of Procurement
- Tatiana Karmanova, Dean of the College of Extended Learning
- Shannon Kelley, Accounts Payable Manager
- Marco Lagos, Coordinator and Immigration Specialist
### Appendix A: Personnel Contacted

**California State University, San Bernardino (cont.)**

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
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</thead>
<tbody>
<tr>
<td>Davina Lindsey</td>
<td>General Accounting Manager</td>
</tr>
<tr>
<td>Stacia McCambridge</td>
<td>Program Administrator</td>
</tr>
<tr>
<td>Elanor Perry</td>
<td>Immigration Specialist</td>
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<tr>
<td>Cara Pham</td>
<td>Administrative Support Coordinator</td>
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<tr>
<td>Arlene Reed</td>
<td>Director of Admissions</td>
</tr>
<tr>
<td>Joyce Woolsey</td>
<td>Office Manager, College of Extended Learning</td>
</tr>
<tr>
<td>Michael Zachary</td>
<td>Internal Auditor</td>
</tr>
<tr>
<td>Jenny Zorn</td>
<td>Associate Provost for Academic and International Programs</td>
</tr>
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</table>

**San Diego State University**

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
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</thead>
<tbody>
<tr>
<td>Elliot Hirshman</td>
<td>President</td>
</tr>
<tr>
<td>Cristina Alfaro</td>
<td>Assistant Professor, Policy Studies in Language and Cross-Cultural Education</td>
</tr>
<tr>
<td>Christopher Bronsдон</td>
<td>Interim University Controller</td>
</tr>
<tr>
<td>Valerie Carter</td>
<td>Director, Audit and Tax</td>
</tr>
<tr>
<td>Sandra Cook</td>
<td>Assistant Vice President, Academic Affairs</td>
</tr>
<tr>
<td>Negar Davis</td>
<td>Director, International Student Center (ISC)</td>
</tr>
<tr>
<td>Rebekah Fuganti</td>
<td>International Programs Coordinator, Office of International Programs (OIP)</td>
</tr>
<tr>
<td>Cathy Garcia</td>
<td>Director, Contract and Procurement Management</td>
</tr>
<tr>
<td>Jane Kalionzes</td>
<td>Associate Director, ISC</td>
</tr>
<tr>
<td>John Lantz</td>
<td>Interim Director, Nursing</td>
</tr>
<tr>
<td>Peter Larlham</td>
<td>Professor, School of Theatre, Television and Film</td>
</tr>
<tr>
<td>Lorretta Leavitt</td>
<td>Associate Vice President, Business and Financial Affairs</td>
</tr>
<tr>
<td>Sarah Maheronnaghsh</td>
<td>Bilingual Credential Advisor, Policy Studies in Language and Cross-Cultural Education</td>
</tr>
<tr>
<td>Tom McCarron</td>
<td>Vice President, Business and Financial Affairs</td>
</tr>
<tr>
<td>Kim Newcomb</td>
<td>Administrative Assistant, College of Extended Studies (CES)</td>
</tr>
<tr>
<td>William Price</td>
<td>Executive Director, American Language Institute</td>
</tr>
<tr>
<td>Francesca Ringland</td>
<td>Interim Associate Dean, CES</td>
</tr>
<tr>
<td>Sally Roush</td>
<td>Vice President, Business and Financial Affairs (At time of review)</td>
</tr>
<tr>
<td>Marti Ruel</td>
<td>Associate Vice President, Student Services</td>
</tr>
<tr>
<td>Joe Shapiro</td>
<td>Dean, CES</td>
</tr>
<tr>
<td>Alan Sweedler</td>
<td>Assistant Vice President, OIP</td>
</tr>
</tbody>
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**San Francisco State University**

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
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<tbody>
<tr>
<td>Leslie E. Wong</td>
<td>President</td>
</tr>
<tr>
<td>Robert A. Corrigan</td>
<td>President (At time of review)</td>
</tr>
<tr>
<td>Patricia Bartscher</td>
<td>General Counsel</td>
</tr>
<tr>
<td>Amy Brandt</td>
<td>Risk Management Associate</td>
</tr>
<tr>
<td>Linda Buckley</td>
<td>Interim Director, College of Extended Learning</td>
</tr>
<tr>
<td>Taver Chong</td>
<td>Associate Internal Auditor</td>
</tr>
<tr>
<td>Ron Cortez</td>
<td>Vice President, Administration and Finance/Chief Financial Officer</td>
</tr>
<tr>
<td>Elaine Feng</td>
<td>Director, Fiscal Services, College of Extended Learning</td>
</tr>
<tr>
<td>Diana Fung</td>
<td>Admissions Coordinator, American Language Institute</td>
</tr>
<tr>
<td>Nancy Hayes</td>
<td>Vice President, Administration and Finance (At time of review)</td>
</tr>
</tbody>
</table>
APPENDIX A: PERSONNEL CONTACTED

San Francisco State University (cont.)
Hildy Heath Director, Office of International Programs
Michelle Hong Assistant to the Associate Vice President, Division of International Education
Marilyn Jackson Assistant Director, Office of International Programs
Richard Kay Program Director, College of Extended Learning
Noah Kuchins International Exchange Programs Advisor
Michael Martin Executive Director, Safety, Risk Management and Human Resources Operations
Sandra Osumi International Student Advisor, American Language Institute
Heather Boshear Robbins Internal Auditor
Leah Rodrigues Program Coordinator, College of Extended Learning
Kathy Sherak Director, American Language Institute
Agnes Wong Nickerson Associate Vice President, Financial Operations
David Wick Coordinator, Study Abroad Services
Yenbo Wu Associate Vice President for International Education

Sonoma State University
Ruben Arminana President
Jenifer Crist Purchasing Manager, Financial Services
Edvige Day International Admissions Specialist
Shalyn Eyer Coordinator, Executive and Professional Programs
Robert Eyler Chair, Associate Professor, Economics
Laurence Furukawa-Schlereth Vice President, Administration and Finance
Helen Kallenbach Director, Sonoma State American Language Institute
Kurt Koehle Director, Internal Operations, Analysis and Review
Mark Merickel Dean, School of Extended and International Education
Andrew Rogerson Provost
Robert Rosen Director of Business and Operations, School of Extended and International Education
Elizabeth Thach Associate Professor of Business Administration
Marisa Thigpen Coordinator of International Services
John Wingard Professor of Anthropology

California State University, Stanislaus
Joseph F. Sheley President
Julie Benevedes Interim Associate Vice President, Financial Services
Susan Clapper Administrative Analyst, Academic Affairs
Russell Giambelluca Vice President, Business and Finance
Briquel Hutton Director of Audit Services
Marjorie Jaasma Interim Associate Vice President, Academic Planning and Analysis
Kevin Nemeth Dean, University Extended Education
William Potter Chair, Department of Psychology
Amy Thomas Assistant Director of Safety and Risk Management
MEMORANDUM

DATE: April 11, 2014

TO: Larry Mandel
Vice Chancellor and Chief Audit Officer

FROM: Sally Roush
Interim Vice Chancellor

SUBJECT: Audit Report # 13-16 International Programs System-wide

In response to the “Incomplete Draft” report dated March 3, 2014, we are providing the enclosed management response.

Should you have any questions, please feel free to contact me.

SFR: mpr

Attachment

c: Ephraim P. Smith, Executive Vice Chancellor and Chief Academic Officer
Ron Vogel, Associate Vice Chancellor, Academic Affairs
Leo Van Cleve, State University Dean and Director, International and Summer Programs
George Ashkar, Assistant Vice Chancellor and Controller, Financial Services
Robert Eaton, Acting Deputy Assistant Vice Chancellor, Financing and Treasury and Risk Management
Michael Redmond, Acting Assistant Vice Chancellor, Headquarters Budget, Security, and Strategic Initiatives

CSU Campuses
Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay
Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy
Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego
San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus
INTERNATIONAL PROGRAMS
SYSTEMWIDE
Audit Report 13-16

GENERAL CONTROL ENVIRONMENT

ROLES AND RESPONSIBILITIES

Recommendation 1

We recommend that the CO clearly define the roles and responsibilities for CO personnel involved in campus-based international programs.

Management Response

We concur. The CO will define the roles and responsibilities for CO personnel involved in campus-based international programs.

This recommendation will be implemented by October 2014.

CENTRALIZED INFORMATION ON PARTICIPANTS

Recommendation 2

We recommend that the CO develop and implement an effective process for the centralized collection and maintenance of real-time information on the location and contact information for students, faculty, and staff traveling abroad.

Management Response

We concur. The CO will establish an effective process to maintain current information on the location and contact information for students, faculty, and staff traveling abroad.

This recommendation will be implemented by October 2014.

POLICIES AND PROCEDURES

Recommendation 3

We recommend that the CO clarify systemwide policies and procedures for international programs to address the inconsistencies and common misinterpretations by campuses noted above.
Management Response

We concur. The CO will clarify system-wide policies and procedures for international programs as required.

This recommendation will be implemented by October 2014.

STUDY-ABROAD AND EXCHANGE PROGRAMS

INTERNATIONAL PROGRAM APPROVAL

Recommendation 4

We recommend that the CO remind campuses of the importance of obtaining proper approval for all international programs.

Management Response

We concur. The CO will ensure campuses are aware of approval processes for international programs.

This recommendation will be implemented by October 2014.

ADMINISTRATION OF THIRD-PARTY PROVIDERS

Recommendation 5

We recommend that the CO remind the campuses of the importance of complying with systemwide policies regarding third-party providers of international programs.

Management Response

We concur. The CO will ensure that campuses are aware of policies regarding third-party providers of international programs.

This recommendation will be implemented by October 2014.

ADMINISTRATION OF EXCHANGE PROGRAMS

Recommendation 6

We recommend that the CO remind the campuses of the importance of complying with systemwide policies for exchange agreements.

Management Response

We concur. The CO will ensure that campuses are aware of systemwide policies for exchange agreements.
This recommendation will be implemented by October 2014.

PRE-DEPARTURE ORIENTATIONS

Recommendation 7

We recommend that the CO remind the campuses of the importance of maintaining evidence showing that all students participating in study-abroad programs have attended a pre-departure orientation and that required topics were covered.

Management Response

We concur. The CO will ensure that campuses are aware of the importance of maintaining evidence showing that all students participating in study-abroad programs have attended a pre-departure orientation and that required topics were covered.

This recommendation will be implemented by October 2014.

STUDENT PARTICIPANT DOCUMENTATION

Recommendation 8

We recommend that the CO remind the campuses of the importance of maintaining evidence showing that students participating in international programs signed the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims form.

Management Response

We concur. The CO will ensure that campuses are aware of the importance of maintaining evidence showing that students participating in international programs signed the CSU Release of Liability, Promise Not to Sue, Assumption of Risk, and Agreement to Pay Claims form.

This recommendation will be implemented by October 2014.
May 1, 2014

MEMORANDUM

TO: Mr. Larry Mandel  
   Vice Chancellor and Chief Audit Officer

FROM: Timothy P. White  
      Chancellor

SUBJECT: Draft Final Report 13-16 on *International Programs*, Systemwide

In response to your memorandum of May 1, 2014, I accept the response as submitted with the draft final report on *International Programs*, Systemwide.

TPW/amd