

OFF-CAMPUS ACTIVITIES
CALIFORNIA STATE UNIVERSITY,
FULLERTON

Audit Report 09-55
October 22, 2009

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ABBREVIATIONS

AI	Academic Internship
CICE	Center for Internships and Community Engagement
CSU	California State University
CSUF	California State University Fullerton
CSURMA	California State University Risk Management Authority
EO	Executive Order
FTIP	Foreign Travel Insurance Program
GC	Government Code
IEE	Office of International Education and Exchange
OCA	Off-Campus Activities
REP	Resolution of the Committee on Educational Policy
SL	Service Learning
SLA	Service Learning Agreement

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2008, the Board of Trustees, at its January 2009 meeting, directed that *Off-Campus Activities* (OCA) be reviewed. The Office of the University Auditor has never reviewed OCA as a combined subject but certain aspects have received some coverage as part of the *Risk Management and Insurance* and *Student Activities* audits in 2003 and 2004, respectively.

We visited the California State University, Fullerton campus from April 13, 2009, through June 4, 2009, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on off-campus activities controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls of off-campus activities in effect as of June 4, 2009, taken as a whole, were sufficient to meet the objectives stated below.

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.

STUDY ABROAD [6]

Documentation for student participation in study abroad programs was not consistently obtained and delegations of authority to sign affiliation agreements for study abroad programs were not documented. In addition, the campus had not adequately documented the value received under exchange agreements.

FIELD TRIPS [10]

Field trip policies and procedures were neither current nor did they provide for adequate training or monitoring of department compliance.

COMMUNITY ENGAGEMENT [12]

Campus practices for preparing student consent forms were inconsistent. There have been limited site visits and numerous unexecuted service learning agreements with community partners for academic internships/service learning. The process for accumulating and validating academic internships and service learning statistics was inefficient. The campus had not insured students volunteering at a Tijuana orphanage – Corazon de Vida.

INTRODUCTION

BACKGROUND

In 1999, former Governor Gray Davis called for a community service requirement for all students of California's public higher education institutions. In response, the Board of Trustees passed a Resolution of the Committee on Educational Policy (REP) 03-02-00, *Community Service: Responding to the Governor's Call*, which requires campus presidents to ensure that all students have opportunities to participate in community service/service learning. The resolution further required that the chancellor annually report to the Board of Trustees on efforts to provide those opportunities to all students.

In November 2005, the Board of Trustees also enacted changes to California Code of Regulations, Title 5 §41301, *Student Code of Conduct*, through REP 11-05-07 that updated expectations and clarified the applicability of the code to off-campus behaviors.

Some *Off-Campus Activities* (OCA) definitions provided in the 2002 California State University (CSU) publication *Best Practices for Managing Risks in Service Learning* include:

Service Learning

A teaching method that promotes student learning through active participation in meaningful and planned service experiences in the community that are directly related to course content. Through reflective activities, students enhance their understanding of course content, general knowledge, sense of civic responsibility, self-awareness, and commitment to the community.

Community Service

Any work provided by individuals that contributes to the quality of life in the community. Community service work can be provided in several ways and for different purposes. Students may be involved in community service on their own, with a group or club, or through academic course work.

Other major OCA components are internships, field trips, study abroad, and student exchange programs.

Internships

There is no common, CSU systemwide definition of internships. One campus defines them as follows:

Internships are processes of education, which formally integrate the students' academic study with practical experience in cooperating organizations. Through this interaction of study and practical experience, students enhance their academic knowledge, their personal development, and their professional preparation. The teaching faculty and the on-site supervisors share in the educational process of internship.

Field Trips

Similar to academic internships, the CSU does not specifically define field trips on a systemwide basis. One campus defines field trips as “required activities outside the regularly scheduled class room/laboratory environment led by the faculty and/or university staff,” while another campus uses a somewhat shorter definition of “supervised, curriculum-related activities held off-campus.”

Study Abroad

Study abroad includes the international programs administered on a systemwide basis in the Office of the Chancellor as well as campus-based programs. In 2009/10, the systemwide international program operated through 19 country sites.

Campuses have authority to establish campus-based, study abroad programs that do not compete with the systemwide program. Campus-based, study abroad programs can be either state-funded or self-supporting. They also have to be short-term (one year or less in duration) and cannot be offered as degree programs. In addition, the continuing or extended education divisions of the campus have to operate the self-supporting study abroad programs.

Student Exchange Programs

Student exchange programs are discussed in Education Code §89705(b) and Executive Order 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, as:

Agreements with foreign institutions of higher education, governmental agencies, or nonprofit corporations or associations executed by the campuses in order to enhance international goodwill and understanding through the exchange of students.

Various CSU campuses also participate in at least one domestic student exchange program – the National Student Exchange.

In the Office of the Chancellor, the Division of Academic Affairs administers OCA primarily through the Center for Community Engagement and the Office of International Programs. The California State University Risk Management Authority and the Office of Risk Management in the Business and Finance Division at the chancellor’s office also provide some program oversight and certain insurances applicable to OCA. At California State University, Fullerton, (CSUF), there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents. The vice president for academic affairs has responsibility for the Center for Internships and Community Engagement and also jointly administers the Office of International Education and Exchange with the vice president for student affairs. The vice president for administration and finance oversees the Office of University Risk Management. In addition, the Volunteer Service Center coordinates student activities at CSUF, which reports to the vice president for student affairs.

PURPOSE

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of OCA 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 overall audit objective, specific goals included determining whether:

- ▶ Accountability for off-campus functions has been clearly defined and documented including delineation of roles and responsibilities, provisions for formulation of goals/objectives, and measurement of outcomes.
- ▶ OCA policies, procedures, and standard forms are current and comprehensive and aligned with relevant federal and state laws/regulations and CSU directives.
- ▶ The chancellor's office and the campuses have established adequate mitigating measures for risks in service learning, community service, academic internships, field trips, study abroad, and student exchange programs.
- ▶ Internal controls in service learning, community service, academic internships, field trips, study abroad, and exchange programs operate as intended.
- ▶ There is an equitable balance in the number of incoming versus outgoing students in exchange programs.
- ▶ Access to automated systems containing OCA information is controlled and limited to authorized users; data backup procedures are in place; and physical security over system hardware is adequate.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment B, Agenda Item 2 of the January 27-28, 2009, meeting of the Committee on Audit stated that *Off-Campus Activities* includes service learning, study abroad programs, internships, field trips, and club sports. Subsequent to this presentation, the audit of club sports was deferred based on substantial CSU work-in-progress to develop and implement a systemwide club sports manual.

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 whether 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 and campus policies, letters, and directives. The audit review focused on procedures in effect for primarily fiscal year 2008/09.

Specifically, we reviewed and tested:

- ▶ Identification of risks and implementation of risk mitigation measures for service learning, community service, academic internships, field trips, study abroad, and student exchange programs.
- ▶ Service learning best practices including site visits and learning agreements with community partners.
- ▶ Involvement with volunteer initiatives.
- ▶ Selection and approval of internships.
- ▶ Field trip notifications and procedures.
- ▶ Execution of study abroad contracts.
- ▶ Relationships with study abroad providers.
- ▶ Student exchange reciprocity.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDY ABROAD

PARTICIPANT DOCUMENTATION

Documentation for student participation in study abroad programs was not consistently obtained.

Our review of five study abroad programs in both the Office of International Education and Exchange (IEE) and the College of Humanities and Social Sciences indicated that:

- ▶ There were no liability releases for three programs.
- ▶ In lieu of the campus release agreement used for other study abroad programs, one program used release agreement forms from the Auxiliary Services Corporation.
- ▶ No records were available for one program.
- ▶ Two programs had inconsistent proof of health insurance documented in the participant files.

Executive Order (EO) 590, *Student Air Travel*, dated March 26, 1992, states that all students participating in CSU-affiliated programs which require air travel shall be required to acknowledge that they have been informed of the risks of air travel required by such programs and to sign a statement certifying that they have been informed of and undertake such air travel voluntarily with full knowledge of such risks, and release and hold harmless the State of California, the California State University, the campus affiliated with the program requiring air travel, and each and every officer, agent, and employee of each of them, from any and all claims and causes of action that the student, or any person(s) claiming through the student, may have against any of the above institutions or persons, by reason of any accident, illness, or injuries, death, or other consequences resulting directly or indirectly from or in any manner arising out of, or in connection with, the student being a passenger on a flight.

EO 998, *Study Abroad Programs*, dated January 25, 2007, requires students to carry health insurance that will be valid in the host country.

Government Code (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 IEE director stated that there might have been some misunderstanding of the documentation requirements on recently implemented programs. The acting dean, College of Humanities and Social Sciences stated that one study abroad program was handled by a professor who had since separated employment.

Failure to obtain appropriate student participant documentation unnecessarily exposes the university to financial loss and/or embarrassment and increases the risk of misunderstandings with student participants.

Recommendation 1

We recommend that the campus implement procedures to ensure that documentation for student participation in study abroad programs is consistently obtained.

Campus Response

We concur. The associate vice president, International Programs has formed a Study Abroad Ad Hoc Committee (September 2009) to discuss various issues related to the smooth implementation of study abroad programs. This group will address documentation of student participation and ensure consistent use of forms and better recordkeeping so that required documentation is available in each student file.

AFFILIATION AGREEMENTS

Delegations of authority to sign affiliation agreements for study abroad programs were not documented.

IEE had agreements with certain affiliate providers for study abroad programs. We found that different staff without delegations of authority signed these agreements as follows:

Affiliate Provider	Campus Signatory
American Institute for Foreign Study	Study Abroad Advisor, IEE
Cultural Experiences Abroad	Associate Vice President, Academic Programs
Global Learning Semester	IEE Acting Director
Institute for Study Abroad – Butler University	IEE Director
International Student Exchange Program	Vice President for Student Affairs
International Studies Abroad	Study Abroad Advisor, IEE

These agreements contained different types of provisions including some that gave the appearance of a conflict with EO 1022, *Study Abroad Through Non-CSU Program Providers*, dated September 24, 2007. EO 1022, §7, states, in part, that:

Neither a California State University campus nor any employee or agent of any California State University campus shall accept payments or other benefits in exchange for being an approved program. This includes, but is not necessarily limited to, the following:

- a. Payment of conference or training registration fees, transportation, or lodging costs for an employee of the campus.

- b. Fees for advertisements in official publications of the campus or international office that are designed to explain the students' program options.
- c. Payment of site visit costs in conjunction with program oversight or program familiarization responsibilities.

EO 775, *Acquisition of Personal Property and Services*, dated June 6, 2001, states that authority is hereby delegated to each campus president or designee to acquire personal property and services including information technology resources, goods, and services where applicable provisions of *The California State University Policy Manual for Contracting and Procurement*, issued and maintained by the Office of the Chancellor, have been followed.

The California State University Policy Manual for Contracting and Procurement §102 requires campus presidents to maintain documentation on delegations of purchasing authority as follows:

Responsibility for the preparation of campus internal policies and procedures consistent with the provision of this manual remains with the campus presidents. Should campus presidents choose to further delegate their purchasing authority, campuses must maintain documentation of such delegation.

The contracts and procurement director stated that the campus had not established a central review and authorization of affiliated agreements due to resource constraints.

The absence of appropriate authorizations for study abroad agreements increases the risk of misunderstandings and potential legal liabilities.

Recommendation 2

We recommend that the campus determine who should sign study abroad affiliation agreements and complete an official delegation of authority for this purpose.

Campus Response

We concur. A university policy statement approved in June 2009 clarifies that authority to sign study abroad affiliation agreements resides with the campus president. The campus will improve procedures by January 31, 2010, to ensure study abroad affiliation agreements are signed by the president.

EXCHANGE RECIPROCITY

The campus had not adequately documented the value received under exchange agreements.

The campus compiles statistics on exchanges through bilateral agreements in terms of the number of inbound versus outbound students. Inbound describes students from other universities attending California State University, Fullerton (CSUF), and outbound is CSUF students studying abroad. Data on the number of inbound and outbound students was available as follows:

Year	Inbound	Outbound
2005/06		12
2006/07		12
2007/08	33	8
2008/09	13	7
2009/10		7

There is not a specific period for achieving reciprocity in exchange agreements, but the campus and others have informally used a three-year period for averaging and addressing any imbalances.

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, authorizes campuses to participate in student exchange agreements provided that comparable expenses are met or waived by, or on behalf of, the foreign entity entering into the agreement.

GC §8314 states that it is unlawful for a state employee to use or permit others to use public resources for personal or other purposes which are not authorized by law.

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 IEE director stated that additional requested data on the number of inbound and outbound students under exchange agreements was unavailable due to a restructuring of the IEE and staff turnover. The IEE director also stated that the campus could measure the values received by means other than the number of inbound and outbound students.

Inadequately documenting the value received under exchange agreements exposes the campus and CSU to criticisms of fiscal improprieties.

Recommendation 3

We recommend that the campus adequately document reciprocity in exchange agreements.

Campus Response

We concur. The campus will monitor and document the reciprocity of exchange agreements within a three-year time frame. We also plan to work with partner institutions to keep numbers better balanced while increasing efforts to facilitate CSUF students participating in exchange programs, as well as better assessing the value-added component of the exchange experience. We will continue to look at both the quantity and quality of the exchanges in reaching reciprocity.

FIELD TRIPS

Field trip policies and procedures were neither current nor did they provide for adequate training or monitoring of department compliance.

During our review of documentation for 17 field trips, we found that:

- ▶ Evidence that the instructors had visited the sites or demonstrated sufficient knowledge of the areas prior to the field trips was not always available.
- ▶ The campus did not document that participants had received detailed instructional agendas with health and safety instructions for 10 of the 17 field trips.
- ▶ Faculty on 3 of the 17 field trips reviewed did not file an Academic Field Trip Participant List with their academic departments. In addition, one additional participant listing was incomplete.
- ▶ All participating students on 6 of the 17 field trips reviewed did not complete and sign a *Release of Liability, Promise Not to Sue, Assumption of Risk and Agreement to Pay Claims* form.
- ▶ The Office of University Risk Management had not received any travel itineraries or participant listings.

Attachment A2 to EO 715, *California State University Risk Management Policy*, dated October 27, 1999, cites multiple guidelines applicable to local and out-of-state field trips including:

- Select a site where the instructor should visit prior to the field trip or demonstrate sufficient knowledge of the area.
- Prepare a detailed day-to-day instructional agenda including health and safety instructions for all participants.
- Plan and include in the itinerary all destinations and alternatives if an emergency prevents entry to the original destination. Send a copy of the itinerary to campus public safety.
- Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.

- Communicate codes of conduct for staff and students.

CSUF's *Academic Field Trips – Faculty and Staff Guidelines* require faculty to:

- Develop a roster of all those traveling on a field trip and a travel itinerary listing all destinations and alternatives.
- Inform participants of what to do during anticipated field trip situations and potential emergencies.
- Keep copies of the roster and itinerary in their department offices and send copies to risk management prior to traveling.

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 professors for some of the related courses were new instructors and stated that they were not aware of the forms required for the field trips. In addition, the chair of the marketing department stated that the instructors were supposed to maintain the forms. The director of risk management stated that the campus field trip guidelines were dated.

The lack of adequate policy and procedure implementation to control the risks associated with off-campus field trips unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

Recommendation 4

We recommend that the campus:

- a. Update field trip policies and procedures and provide training to constituents on the revised requirements.
- b. Implement a reliable process to monitor and enforce compliance with field trip policies and procedures.

Campus Response

We concur. The campus will:

- a. Update field trip policies and procedures and provide training to constituents on the revised requirements by January 31, 2010.

- b. Improve campus monitoring and enforcement practices to ensure compliance with field trip policies and procedures by January 31, 2010.

COMMUNITY ENGAGEMENT

STUDENT CONSENT FORMS

Campus practices for preparing student consent forms were inconsistent.

Student consent/liability release forms for the majority of academic internship (AI) and service learning (SL) opportunities through the Center for Internships and Community Engagement (CICE) were acknowledged electronically and without digital signatures. In non-CICE placements, student teachers, but not student nurses, signed consent forms when both have the same California State University Risk Management Authority (CSURMA) insurance coverage through the Student Professional Liability Insurance Program.

Students register online at CICE after logging in through their Titan Portal account. The log-in process requires a student identification number and password. The last step in the three-step CICE registration process requires students to electronically acknowledge a participation consent form.

Arrangements for placement of student teachers and student nurses are made through their respective college/department offices. All consent forms by student teachers are processed and maintained in hard copies.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, addresses placement agreements, including hold harmless provisions.

GC §16.5 and California Code of Regulations §22000 address digital signatures.

The CICE director stated that the only way they could accommodate the volume of student consent forms was to automate the process and students were already using the Titan Portal system for electronically accepting other types of contractual transactions. The nursing department chair stated that the nursing students manually signed a unique type of release due to clinical requirements, which the nursing department maintained were different from service learning.

The inconsistent use of student consent forms exposes the university to liability and/or embarrassment and increases the risk of misunderstandings with student participants.

Recommendation 5

We recommend that the campus evaluate the current practice for preparing student consent forms and implement controls to ensure consistency and uniformity.

If applicable, we also recommend that the campus:

- a. Obtain approval from the chancellor's office to allow the practice of electronically acknowledging student consent forms through the Titan Portal system without digital signatures or discontinue use of the electronic acknowledgments.
- b. Obtain student consent forms for student nurses or eliminate the need for such forms from student teachers.

Campus Response

We concur.

- a. We concur. The campus will evaluate the current practice for preparing student consent release forms and implement controls by February 1, 2010, to ensure consistency and uniformity, and to address other audit recommendations above as applicable.
- b. The Department of Nursing will obtain student consent forms for nursing students in the future.

SITE VISITS AND COMMUNITY PARTNER AGREEMENTS

Site visits to community partner locations were neither performed consistently nor were executed service learning agreements (SLA) with community partners always obtained.

Site Visits

CICE estimates that site visits were performed at approximately 38 community partner locations. Based on the number of SLAs, the campus has partnerships with close to 3,000 organizations as of 2008/09.

Learning Agreements

CICE tracks and reports the number of student placements at sites with SLAs for both AI and SL placements as follows:

NO. OF AI STUDENT PLACEMENTS	2007/08	2008/09	TOTAL	PERCENT
At sites with a SLA on file	703	697	1,400	48.7%
At sites with no SLA	472	361	833	29.0%
At sites with blank SLA information	452	188	640	22.3%
S.T.	1,627	1,246	2,873	100.0%
NO. OF SL STUDENT PLACEMENTS	2007/08	2008/09	TOTAL	PERCENT
At sites with a SLA on file	455	308	763	69.9%
At sites with no SLA	180	83	263	24.1%

At sites with blank SLA information	19	46	65	6.0%
S.T.	654	437	1,091	100.0%
COMBINED AI/SL PLACEMENTS	2007/08	2008/09	TOTAL	PERCENT
At sites with a SLA on file	1,158	1,005	2,163	54.6%
At sites with no SLA	652	444	1,096	27.6%
At sites with blank SLA information	471	234	705	17.8%
TOTAL	2,281	1,683	3,964	100.0%

On a cumulative basis, CICE also maintains a summary on the number of SLAs that community partners have executed and returned. One such tally through 2008/09 was:

SLA Status	Number	Percent
On File	940	32.1%
Pending	1,986	67.9%
TOTAL	2,926	100.0%

The 2002 CSU publication *Best Practices for Managing Risks in Service Learning* provides for site visits to community-based organizations and development of SLAs.

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 CICE director stated that more extensive site visits would require additional staff and these resources were unavailable. The director of risk management stated that they tried to mitigate for the lack of site visits by modifying the language in the student consent form to include factors for students to consider in evaluating a particular academic internship/service learning opportunity. The CICE director also stated that the large number of unexecuted SLAs accumulate because community partners realize that they do not have to complete and return them before hosting students.

Inconsistent efforts to visit service learning sites and obtain partner agreements in community engagement arrangements affects student safety and exposes the university to liability loss and/or embarrassment due to misunderstandings of risk and responsibilities.

Recommendation 6

We recommend that the campus:

- a. Conduct a risk assessment of the community partner locations and perform site visits to the locations of highest risk.
- b. Obtain executed service learning agreements with all community partners.

Campus Response

We concur.

- a. The campus will conduct a risk assessment of community partner locations and develop a plan by February 1, 2010, to complete site visits to the locations of highest risk by June 30, 2010, and obtain executed service agreements with all community partners.
- b. The Center for Internships & Community Engagement, in partnership with the Contracts and Procurements Office, will obtain executed service learning agreements from all community partners whose agreements are currently in process, by February 2010. If the current learning agreements are not executed by February 10, 2010, those organizations will not be listed in the Center's database as an approved site for service learning activities. Further, new community partners that do not fully execute the learning agreement within a 10-week time frame will not be listed with the Center as an approved site.

STATISTICS

The process for accumulating and validating AI and SL statistics was inefficient and potentially error prone as the data could not be independently recreated.

In the 2007/08 CICE Annual Report, the campus reported 442 AI and 277 SL course sections. Upon our request of a detailed breakdown of these numbers, the tally was 416 AI and 166 SL course sections. The details did not support the summaries.

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 CICE director stated that the capability to capture and report AI and SL statistics changed with the transition to the Common Management Systems. The CICE assistant director stated that improvement in the data necessitates verification of what the campus had previously coded and carried forward from the legacy system.

Unreliable statistics on AI and SL activity creates misleading information on program accomplishments and jeopardizes campus credibility.

Recommendation 7

We recommend that the campus improve the process for accumulating and validating AI and SL statistics.

Campus Response

We concur. The Center for Internships & Community Engagement will establish a process with the scheduling office to accumulate and validate all AI and SL statistics for consistency with campus records by December 31, 2009.

CORAZON DE VIDA

Students volunteering at an orphanage in Tijuana were not insured.

The Volunteer Service Center in student affairs supports a program run through the Corazon de Vida Foundation whereby students travel by bus to an orphanage in Tijuana for one day. The extent of campus support included advertising the event, recruiting student participants, and assisting in fund-raising activities to pay for trip fees. This program has occurred in fall and spring for a number of years, but in 2007/08, it ran only once on November 15, 2008.

CSUF encourages international travelers to obtain insurance through the CSURMA Foreign Travel Insurance Program (FTIP) and relies on a database of FTIP coverage as a tracking mechanism for rapid identification of travelers in emergencies.

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 director of risk management stated that the insurance requirements for Corazon de Vida were different because it was a student-run project.

Failure to obtain insurance exposes students and the university to increased costs and liability.

Recommendation 8

We recommend that the campus research the availability and cost of insuring students who travel internationally for volunteer activities

Campus Response

We concur. The campus will research the availability and cost of insuring students who travel internationally for volunteer activities by February 15, 2010.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Milton A. Gordon	President
Silas Abrego	Associate Vice President, Student Affairs
Jane Evan Anderson	Administrative Support Coordinator, Division of Politics, Administration, and Justice
Jack Bedell	Chair, Department of Anthropology
John Beisner	Director, Risk Management
Kim Bette-Wright	Administrative Support Coordinator, Department of Geography
John Carroll	Chair, Department of Geography
Pat Carroll	Executive Assistant
Jim Case	Director, Career Center
James Choi	Chair, Computer Science Department
Susan Cooper	Dean, Irvine Campus
Kathleen Costello	Assistant Director, Center for Internships and Community Engagement
Carole Hampton Cotter	Production and Business Coordinator, Department of Theatre and Dance
Jeanne Crawford	Administrative Support Assistant, Department of Biological Sciences
Bill Dickerson	Executive Director, Auxiliary Services Corporation
Carmen Dunlap	Associate Dean, College of Education
Ed Fink	Chair, Department of Radio, Television, and Film
Howard Foreman	Professor, Marketing Department
Naomi Goodwin	Assistant Vice President, Administration and Finance
Don Green	Director, Contracts and Procurement
Cindy Greenberg	Chair, Department of Nursing
Willie Hagan	Vice President, Administration and Finance/Chief Financial Officer
Susan Hallman	Chair, Department of Theatre and Dance
Katrin Harich	Marketing Professor and Director, Center for International Business
Bahram Hatefi	Director of Internal Audit
Paula Herberg	Acting Associate Vice President, International Programs
Mikel Hogan	Chair, Human Services Department
Jeannie Kim-Han	Director, Center for Internships and Community Engagement
Robert Koch	Chair, Department of Biological Sciences
Irene Lange	Chair, Marketing Department
Joe Luzzi	Assistant Director, Enterprise Resource Planning
Ken Ly	Director, System Infrastructure and Application Development
Amy Mattern	Coordinator, Volunteer and Service Center
Maria Mezhinsky	Director, Information Technology (Admissions and Records Office)
Kari Knutson Miller	Chair, Department of Child and Adolescent Studies
Kathryn Morrissey	Study Abroad Program Assistant
Harry Norman	Dean, University Extended Education
Lilian Pahn	Placement Coordinator, Center for Internships and Community Engagement
Robert Palmer	Vice President, Student Affairs
Diana Ruiz	Administrative Support Coordinator, Risk Management
Ephraim Smith	Vice President, Academic Affairs

APPENDIX A: PERSONNEL CONTACTED


<u>Name</u>	<u>Title</u>
Raphael Sonenshein	Chair, Division of Politics, Administration, and Justice
Lay Tuan Tan	Director, Office of International Education and Exchange
Esiquio Uballe	Associate Dean of Students, Student Life
Angela Della Volpe	Acting Dean, College of Humanities and Social Sciences
Angela Warren	Buyer, Contracts and Procurement
Tom Whitfield	Director, Environmental Health and Instructional Safety
Sally Yassine	Associate Director, Contracts and Procurement



CALIFORNIA STATE UNIVERSITY, FULLERTON

President's Office

800 N. State College Blvd., Fullerton, CA 92831 / T 657-278-3456 / F 657-278-2649

DATE: November 13, 2009**TO:** Larry Mandel
University Auditor**FROM:** Milton A. Gordon
President **SUBJECT:** Response for Off-Campus Activities Audit Report 09-55RECEIVED
UNIVERSITY AUDITOR

NOV 19 2009

THE CALIFORNIA STATE
UNIVERSITY

I am pleased to forward California State University, Fullerton's official response to the eight (8) recommendations in the Off-Campus Activities Audit Report 09-55.

Once again, we would like to thank the University Auditor and his staff for conducting the audit in a professional manner in identifying meaningful ways to improve policies and procedures related to the administration of off campus activities and to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

The Campus Auditor, Bahram Hatefi, will also forward the responses to you electronically for your convenience. Should you have questions, please contact Bahram at (657) 278-7299 or bhatefi@fullerton.edu.

Attachments

cc: Willie Hagan, Vice President, Administration & Finance CFO
Pat Carroll, Executive Assistant to the President
Bahram Hatefi, Director of CSUF Internal Audit
Paula Herberg, Acting AVP International Programs
Robert Palmer, Vice President, Student Affairs
Ephraim Smith, Vice President, Academic Affairs

OFF-CAMPUS ACTIVITIES
CALIFORNIA STATE UNIVERSITY,
FULLERTON

Audit Report 09-55

STUDY ABROAD

PARTICIPANT DOCUMENTATION

Recommendation 1

We recommend that the campus implement procedures to ensure that documentation for student participation in study abroad programs is consistently obtained.

Campus Response

Concur: The AVP, International Programs has formed a Study Abroad Ad Hoc Committee (September 2009) to discuss various issues related to the smooth implementation of study abroad programs. This group will address documentation of student participation and ensure consistent use of forms and better record keeping so that required documentation is available in each student file.

AFFILIATION AGREEMENTS

Recommendation 2

We recommend that the campus determine who should sign study abroad affiliation agreements and complete an official delegation of authority for this purpose.

Campus Response

We concur. A university policy statement approved in June 2009 clarifies authority to sign study abroad affiliation agreements resides with the campus President. The campus will improve procedures by January 31, 2010 to ensure study abroad affiliation agreements are signed by the President.

EXCHANGE RECIPROCITY

Recommendation 3

We recommend that the campus adequately document reciprocity in exchange agreements.

Campus Response

Concur: The campus will monitor and document the reciprocity of exchange agreements within a three-year time frame. We also plan to work with partner institutions to keep numbers better balanced while increasing efforts to facilitate CSUF students participating in exchange programs, as

well as better assessing the value added component of the exchange experience. We will continue to look at both the quantity and quality of the exchanges in reaching reciprocity.

FIELD TRIPS

Recommendation 4

We recommend that the campus:

- a. Update field trip policies and procedures and provide training to constituents on the revised requirements.
- b. Implement a reliable process to monitor and enforce compliance with field trip policies and procedures.

Campus Response

We concur. The campus will:

- a) Update field trip policies and procedures and provide training to constituents on the revised requirements by January 31, 2010.
- b) Improve campus monitoring and enforcement practices to ensure compliance with field trip policies and procedures by January 31, 2010.

COMMUNITY ENGAGEMENT

STUDENT CONSENT FORMS

Recommendation 5

We recommend that the campus evaluate the current practice for preparing student consent forms and implement controls to ensure consistency and uniformity.

If applicable, we also recommend that the campus:

- a. Obtain approval from the chancellor's office to allow the practice of electronically acknowledging student consent forms through the Titan Portal system without digital signatures or discontinue use of the electronic acknowledgments.
- b. Obtain student consent forms for student nurses or eliminate the need for such forms from student teachers.

Campus Response

We concur.

- a) We concur. The campus will evaluate the current practice for preparing student consent release forms and implement controls by February 1, 2010 to ensure consistency, uniformity, and address other audit recommendations above as applicable.
- b) The Department of Nursing will obtain student consent forms for nursing students in future.

SITE VISITS AND COMMUNITY PARTNER AGREEMENTS

Recommendation 6

We recommend that the campus:

- a. Conduct a risk assessment of the community partner locations and perform site visits to the locations of highest risk.
- b. Obtain executed service learning agreements with all community partners.

Campus Response

We concur.

- a) The campus will conduct a risk assessment of community partner locations and develop a plan by February 1, 2010 to complete site visits to the locations of highest risk by June 30, 2010 and obtain executed service agreements with all community partners.
- b) The Center for Internships & Community Engagement, in partnership with the Contracts and Procurements Office will obtain executed service learning agreements from all community partners whose agreements are currently in process, by February, 2010. If the current learning agreements are not executed by February 10, 2010, those organizations will not be listed in the Center's database as an approved site for service-learning activities. Further, new community partners that do not fully execute the Learning Agreement within a 10 week timeframe will not be listed with the Center as an approved site.

STATISTICS

Recommendation 7

We recommend that the campus improve the process for accumulating and validating AI and SL statistics.

Campus Response

Concur. The Center for Internships & Community Engagement will establish a process with the scheduling office to accumulate and validate all AI and SL statistics for consistency with campus records by December 31, 2009.

CORAZON DE VIDA

Recommendation 8

We recommend that the campus research the availability and cost of insuring students who travel internationally for volunteer activities.

Campus Response

We concur. The campus will research the availability and cost of insuring students who travel internationally for volunteer activities by February 15, 2010.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR



BAKERSFIELD

December 14, 2009

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FROM: Charles B. Reed
Chancellor

FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-55 on *Off-Campus Activities*,
California State University, Fullerton

LONG BEACH

LOS ANGELES

In response to your memorandum of December 14, 2009, I accept the response as submitted with the draft final report on *Off-Campus Activities*, California State University, Fullerton.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS