

**OFF-CAMPUS ACTIVITIES**  
**CALIFORNIA STATE UNIVERSITY,**  
**LOS ANGELES**

**Audit Report 09-56**  
**November 5, 2009**

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## **ABBREVIATIONS**

|       |   |
|-------|---|
| CSU   | California State University                       |
| CSULA | California State University, Los Angeles          |
| EO    | Executive Order                                   |
| GC    | Government Code                                   |
| IPS   | International Programs and Services               |
| MOU   | Memorandum of Understanding                       |
| OCA   | Off-Campus Activities                             |
| REP   | Resolution of The Committee on Educational Policy |

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## **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, Los Angeles campus from June 8, 2009, through July 2, 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 for off-campus activities in effect as of July 2, 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 AND EXCHANGE PROGRAMS [6]**

The university did not have a formal plan to regularly review, evaluate, and improve study abroad and exchange programs and had not adequately documented the value received under exchange agreements. In addition, exchange agreements did not contain hold harmless provisions and were not signed by the president or a staff member with appropriate delegation of authority.

### **FIELD TRIPS [8]**

Emergency contact information was not documented for academic field trip participants.

### **COMMUNITY ENGAGEMENT [9]**

Site visits to service learning/community engagement partner locations did not include the identification and mitigation of safety risks to the students and emergency contact information for the service learning participants was not documented.

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## 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, Los Angeles, there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents. The vice president for student affairs has responsibility for the Educational Participation in Communities and International Programs and Services. The vice president for administration and chief financial officer oversees Environmental Health and Safety/Risk Management.

## **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.

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# **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

## **STUDY ABROAD AND EXCHANGE PROGRAMS**

### **PROGRAM REVIEWS**

The university did not have a formal plan to regularly review, evaluate, and improve study abroad and exchange programs.

Executive Order (EO) 744, *State-Funded Campus-Based Study Abroad Programs*, dated June 7, 2000, states that campus presidents, or their designees, will incorporate plans for the review, evaluation, and improvement for state-funded campus-based study abroad programs as a regular feature and condition of their operation.

EO 745, *Self-Support Campus-Based Study Abroad Programs*, dated June 7, 2000, states that campus presidents, or their designees, will incorporate plans for the review, evaluation, and improvement for self-funded campus-based study abroad programs as a regular feature and condition of their operation.

The international programs and services (IPS) director stated that the campus was unaware of the requirement to perform the review of the study abroad and exchange programs.

The absence of a formal review process decreases the institution's ability to demonstrate that organizational goals have been achieved.

### **Recommendation 1**

We recommend that the campus develop a formal plan to regularly review, evaluate, and improve the study abroad and exchange programs.

### **Campus Response**

We are in the process of developing a formal plan. The targeted implementation date is January 30, 2010.

## **EXCHANGE RECIPROCITY**

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

We noted that the campus compiles statistics on outbound exchanges through bilateral agreements. However, the reports do not include a comparison of the number of inbound versus outbound students and the associated value.

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.

Government (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 IPS director stated that the campus was unaware of the requirement to perform the review of the exchange programs, which would have evaluated the value received against the value given under the exchange program.

Inadequately documenting the value received under exchange agreements exposes the campus and California State University (CSU) to criticisms of fiscal improprieties.

## **Recommendation 2**

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

### **Campus Response**

We are in the process of developing a process to document the program evaluation of exchange reciprocity. The targeted implementation date is January 30, 2010.

## **EXCHANGE PROGRAM AGREEMENTS**

Exchange agreements were not complete nor signed by appropriate university personnel.

During our review of all six student exchange agreements, we found that:

- ▶ Five agreements did not include the appropriate hold harmless clause between the university partner and the campus.
- ▶ The dean of graduate studies and research signed the exchange agreements without a delegation of authority. Sometimes, the university developed a memorandum of understanding (MOU) with the partner university, signed by the president, which stated that the dean of graduate studies and research would maintain the agreement. The dean of graduate studies and research then reviewed and signed the final agreement between the universities.

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, states, in part, that campus presidents or their designees may initiate agreements with foreign institutions of higher education, governmental agencies, or nonprofit corporations or associations in order to enhance international goodwill and understanding through the exchange of students.

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 IPS director stated that the campus was unaware of the requirement for the indemnification language in the exchange agreements. The dean of graduate studies and research stated his belief that the MOU signed by the president was the appropriate delegation of authority.

Failure to include the hold harmless language in exchange agreements and the lack of an appropriate delegation of authority increase the risks of misunderstandings, unauthorized activities, and potential legal liabilities.

### **Recommendation 3**

We recommend that the campus:

- a. Include an appropriate hold harmless clause in all exchange agreements.
- b. Determine who should sign student exchange agreements and complete an official delegation of authority for this purpose.

### **Campus Response**

- a. We have developed a template for future exchange agreements which includes the indemnification language.
- b. The delegation of authority will be reviewed and updated. The targeted implementation date is December 31, 2009.

## **FIELD TRIPS**

Emergency contact information was not documented for academic field trip participants.

During our review of documentation for 14 academic field trips, we found that emergency contact information was not documented for any of the trip participants.

The California State University, Los Angeles (CSULA) *Student Field Trip and International Travel Program Internal Procedures* state that the field trip supervisor shall have a written emergency preparedness process (who to contact under what circumstances) with emergency contact information for each field trip and this information shall be provided to each traveling participant and retained in the department office.

The acting director of the school of nursing and the associate dean of undergraduate studies stated that they were unaware of the requirement to obtain emergency contact information for the field trip participants.

The lack of an easily accessible emergency contact listing prevents timely and appropriate emergency response for students involved in off-campus activities.

#### **Recommendation 4**

We recommend that the campus implement procedures to ensure completion and retention of emergency contact information for students participating in academic field trips.

#### **Campus Response**

We have developed a process to document the emergency contact information for students going on academic field trips.

## **COMMUNITY ENGAGEMENT**

### **SERVICE LEARNING SITE VISITS**

Site visits to service learning/community engagement partner locations did not include the identification and mitigation of safety risks to the students.

Instead, we found that the site visits for ten service learning/community engagement partners focused on student observations and how the sites met the stated learning objectives for the courses. The site visit documentation did not mention health and safety assessments for the community partners.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that site visits should identify the risks to the students and any steps taken to mitigate those risks for the student and the university.

The 2002 CSU publication *Best Practices for Managing Risks in Service Learning* states that the campus is to conduct site reviews before, during, and after a service learning course is offered.

The associate dean of undergraduate studies stated that although visits are conducted at service learning sites, the unit that is responsible for conducting service learning site visits for the purpose of assessing the risk for the students and the university has not been clearly defined.

Inadequate site visits affect student safety and expose the university to liability and embarrassment due to misunderstandings of risk and responsibilities.

### **Recommendation 5**

We recommend that the campus assess safety risks and risk mitigation measures in site visits to service learning community engagement partners.

### **Campus Response**

We have developed a site visit checklist that includes the assessment of safety risk and risk mitigation measures in site visits. It will be used for future site visits. The targeted implementation date is December 31, 2009.

## **EMERGENCY CONTACT INFORMATION**

Emergency contact information was not documented for service learning participants.

We found that applications for 31 students attending service learning/community engagement courses in the spring 2009 did not include the student's emergency contact information.

The CSULA *Student Field Trip and International Travel Program Internal Procedures* state that the field trip supervisor shall have a written emergency preparedness process (who to contact under what circumstances) with emergency contact information for each field trip and this information shall be provided to each traveling participant and retained in the department office.

The educational partners in communities director stated that he was unaware of the requirement to obtain the emergency contact information for the service learning participants.

The lack of an easily accessible emergency contact listing prevents timely and appropriate emergency response for students involved in off-campus activities.

### **Recommendation 6**

We recommend that the campus implement procedures to ensure completion and retention of emergency contact information for students participating in service learning activities.

### **Campus Response**

We have developed an on-site orientation checklist that includes the emergency contact information during the on-site orientations. It will be used for future service learning on-site orientations. The targeted implementation date is December 31, 2009.

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## APPENDIX A: PERSONNEL CONTACTED

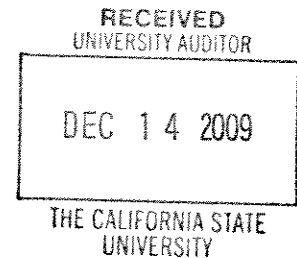
| <u>Name</u>        | <u>Title</u>  |
|--------------------|---|
| James M. Rosser    | President   |
| Joseph Aguirre     | Executive Director, University Student Union  |
| Monique Allard     | Director of Student Services, Charter College of Education  |
| Jennifer Amaya     | Study Abroad Advisor  |
| Kevin Brady        | Director, Risk Management /Environmental Health & Safety  |
| Nancy Clausen      | Buyer II - Procurement and Contracts  |
| Jose Galvan        | Dean of Graduate Studies and Research   |
| Alfredo Gonzalez   | Dean, Office of Undergraduate Studies   |
| Julissa Gutierrez  | Field Coordinator, Teacher Preparation Advising Center  |
| Michelle Hawley    | Associate Professor, Department of English  |
| James Henderson    | Dean, College of Natural and Social Sciences  |
| Tanya Ho           | University Internal Auditor   |
| Cynthia Hughes     | Acting Director, School of Nursing and Professor  |
| Yara Jimenez       | Director, Upward Bound Programs   |
| Nadine Koch        | Associate Dean of Undergraduate Studies   |
| Christine Leung    | Senior Internal Auditor, University Internal Audit  |
| Sachiko Matsunaga  | Chair, Department of Modern Languages and Literature  |
| Don Maurizio       | Acting Associate Dean - College of Engineer,<br>Computer Science and Technology                                 |
| Tina T. Mueller    | Buyer III Lead, Procurement and Contracts   |
| Marcia Ann Murota  | Director, Student Academic Success Programs   |
| Jorge Ortega       | Director, California Student Opportunity and Access Program   |
| George Pardon      | Vice President, Administration and Finance/Chief Financial Officer  |
| Pariz Partow-Navid | Director of Student Service and Chair, Department of Information<br>Systems - College of Business and Economics |
| Alma P. Sahagun    | Director of Grants and Contracts, Office of Research and Sponsored<br>Programs - University Auxiliary Services  |
| Dan Thomas         | Risk Management Coordinator   |
| Jorge Uranga       | Director, Educational Participation in Communities  |
| Marcelo Vazquez    | Director, Project Gear-up   |
| Nancy Wada-Mckee   | Assistant Vice President for Student Affairs-Student Services   |
| Amy Wang           | Director, International Programs and Services   |



CALIFORNIA STATE UNIVERSITY, LOS ANGELES

OFFICE OF THE PRESIDENT

December 8, 2009



Mr. Larry Mandel, University Auditor  
Office of the University Auditor  
Office of the Chancellor – The California State University  
401 Golden Shore, 4<sup>th</sup> Floor  
Long Beach, CA 90802-4210

Re: *University's Response to Recommendations Contained in Report Number 09-56  
Off-Campus Activities - CSULA*

Dear Mr. Mandel:

Attached are the University's responses to the recommendations contained in Report Number 09-56, Off-Campus Activities audit.

Please contact Tanya Ho, University Internal Auditor, at (323) 343-5102, if you wish to discuss any matter contained herein.

Sincerely,

A handwritten signature in cursive script, appearing to read "James M. Rosser".

James M. Rosser  
President

Attachment

cc: (with attachments)  
George Pardon, Vice-President for Administration and Chief Financial Officer  
Lisa Chavez, AVP for Administration and Finance  
Tanya Ho, University Internal Auditor

**OFF-CAMPUS ACTIVITIES**

**CALIFORNIA STATE UNIVERSITY,  
LOS ANGELES**

**Audit Report 09-56**

**STUDY ABROAD AND EXCHANGE PROGRAM**

**PROGRAM REVIEWS**

**Recommendation 1**

We recommend that the campus develop a formal plan to regularly review, evaluate, and improve the study abroad and exchange programs.

**Campus Response**

We are in the process of developing a formal plan. The targeted implementation date is January 30, 2010.

**EXCHANGE RECIPROCITY**

**Recommendation 2**

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

**Campus Response**

We are in the process of developing a process to document the program evaluation of exchange reciprocity. The targeted implementation date is January 30, 2010.

## **EXCHANGE PROGRAM AGREEMENTS**

### **Recommendation 3**

We recommend that the campus:

- a. Include an appropriate hold harmless clause in all exchange agreements.
- b. Determine who should sign student exchange agreements and complete an official delegation of authority for this purpose.

### **Campus Response**

- a. We have developed a template for future Exchange Agreements which include the indemnification language.
- b. The delegation of authority will be reviewed and updated. The targeted implementation date is December 31, 2009.

## **FIELD TRIPS**

### **Recommendation 4**

We recommend that the campus implement procedures to ensure completion and retention of emergency contact information for students participating in academic field trips.

### **Campus Response**

We have developed a process to document the emergency contact information for students going on academic field trips.

## **COMMUNITY ENGAGEMENT**

### **SERVICE LEARNING SITE VISIT**

#### **Recommendation 5**

We recommend that the campus assess safety risks and risk mitigation measures in site visits to service learning community engagement partners.

### **Campus Response**

We have developed a site visit checklist that includes the assessment of safety risk and risk mitigation measures in site visits. It will be used for future site visit. The targeted implementation date is December 31, 2009.

### **EMERGENCY CONTACT INFORMATION**

#### **Recommendation 6**

We recommend that the campus implement procedures to ensure completion and retention of emergency contact information for students participating in service learning activities.

### **Campus Response**

We have developed an on-site orientation checklist that includes the emergency contact information during the on-site orientations. It will be used for future service learning on-site orientations. The targeted implementation date is December 31, 2009.

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR



BAKERSFIELD

January 22, 2010

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 09-56 on *Off-Campus Activities*,  
California State University, Los Angeles

LONG BEACH

LOS ANGELES

In response to your memorandum of January 22, 2010, I accept the response as submitted with the draft final report on *Off-Campus Activities*, California State University, Los Angeles.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS