OFF-CAMPUS ACTIVITIES

CALIFORNIA STATE UNIVERSITY,
NORTH RIDGE

Audit Report 09-60
March 10, 2010

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THE CALIFORNIA STATE UNIVERSITY
APPENDICES

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

ABBREVIATIONS

AIFS American Institute for Foreign Study
CSU California State University
CSUN California State University, Northridge
EO Executive Order
OCA Off-Campus Activities
REP Resolution of the Committee on Educational Policy
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, Northridge campus from July 27, 2009, through September 11, 2009, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant risk exposures if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: study abroad, student exchange programs, field trips, internships, and service learning engagements. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls for off-campus activities in effect as of September 11, 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 satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

STUDY ABROAD AND EXCHANGE PROGRAMS [6]

Program agreements were not always in place, complete, or signed by appropriate university personnel. The overall administration of the study abroad and exchange programs needed improvement.

FIELD TRIPS [10]

Field trip policies and procedures did not provide for adequate personnel training or monitoring of department compliance.

COMMUNITY ENGAGEMENT AND SERVICE LEARNING [12]

Site visits to community partner locations were not performed nor did the campus execute agreements with community partners. The campus did not consistently perform orientations or maintain student documentation for internships. The process for accumulating and validating service learning statistics and obtaining participant documentation for service learning activities was ineffective.
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 classroom/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, Northridge, 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 oversees the Center for Innovative and Engaged Learning Opportunities, the International and Exchange Student Center, the Career Center, and the various departments’ field trip activities. The vice president for administration oversees Risk Management and Purchasing and Contracts. In addition, the vice president for student affairs oversees the Matador Involvement Center.
INTRODUCTION

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 AND EXCHANGE PROGRAMS

AGreements

Program agreements were not always in place, complete, or signed by appropriate university personnel.

Our review of three third-party study abroad programs, nine international exchange programs, and one domestic exchange program disclosed the following:

Third-Party Study Abroad Programs

 The campus had no agreement on file for the Consultants for Global Programs that it promoted actively on the study abroad website.

 Neither campus nor American Institute for Foreign Study (AIFS) personnel had executed the initial agreement for the AIFS. Campus personnel did not execute the first AIFS renewal agreement and the assistant director of international programs executed a second AIFS renewal agreement without a delegation of authority.

 All three AIFS agreements and the agreement for the Institute of Shipboard Education lacked appropriate indemnification language. We also noted that purchasing and contract administration did not review any of these four agreements prior to execution.

Exchange Programs

 All ten agreements lacked appropriate indemnification language and purchasing and contract administration did not review them.

 The campus accepted incoming students for two programs without reciprocity.

California State University, Northridge (CSUN) Policy 200-02, Contract Approval for Campus Organizations, dated November 1, 2004, states that all proposed contractual agreements, which would bind the campus, must be reviewed by purchasing and contract administration, prior to execution by individuals with contract signature delegation. This review is required regardless of monetary consideration.

Executive Order (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, delegates authority to the campus president or designee to initiate and conduct student international exchange agreements.
EO 745, *Self-Supported Campus-Based Study Abroad Programs*, dated June 7, 2000, states that the specific policies and procedures contained within the executive order apply to the development, administration, and conduct of all self-supported campus-based study abroad programs. The EO includes requirements that such programs undergo a normal on-campus development process. This process must incorporate all appropriate administrative and academic reviews and approvals. It must also incorporate plans for the review, evaluation, and improvement of self-supported campus-based study abroad programs.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, documents insurance requirements for agreements and contracts. It states that placement agreements for course-required work experience must be in writing and shall specify minimum insurance requirements applicable to the contracting parties and appropriate hold harmless provisions based on the needs of the contracting parties.

EO 1022, *Study Abroad Through Non-CSU Program Providers*, dated September 24, 2007, delegates authority to the campus president or designee to initiate and conduct study abroad programs with non-CSU providers.

The assistant provost stated that the organizational structure of the campus created a challenge to implement centralized control procedures. The coordinator of international programs and the assistant director of international programs stated that the International Programs Committee, which is responsible for establishing and maintaining the third-party and international exchange program agreements, might not have been fully aware of the campus, CSU policies, and state statutes that were applicable to this area of operation. The manager of purchasing and contract administration stated that her department has not been involved with the review and execution of study abroad agreements nor were they asked to be involved with such activities.

Failure to obtain appropriate agreements for study abroad and exchange programs affects student safety and exposes the university to liability due to misunderstandings of risks and responsibilities.

**Recommendation 1**

We recommend that the campus:

a. Implement controls to ensure that third-party study abroad and exchange program agreements are obtained, properly executed and reviewed by purchasing and contract administration, include the appropriate indemnification language, and provide for the exchange of students, materials, and equipment.

b. Determine who should sign third-party study abroad agreements and complete an official delegation of authority from the president for this purpose.

c. Establish a system to formally review international exchange program reciprocity and limit incoming and outgoing students as required.
Campus Response

We concur. The campus will:

a. Implement controls to ensure that exchange program agreements are obtained, properly executed, and reviewed by purchasing and contract administration; include the appropriate indemnification language; and provide for the exchange of students, materials, and equipment.

   Expected completion date: July 31, 2010

b. Discontinue contracting with third-party study abroad providers.

   Expected completion date: May 31, 2010

c. Establish a system to formally review international exchange program reciprocity and limit incoming and outgoing students as required.

   Expected completion date: July 31, 2010

PROGRAM ADMINISTRATION

The overall administration of the study abroad and exchange programs needed improvement.

Our review of three third-party study abroad programs, nine international exchange programs, and one domestic exchange program disclosed the following:

- The campus did not track outbound students for all 13 programs to ensure that required activities (e.g., provision of pre-departure orientations, determination of health insurance coverage, academic advisement, and procurement of student releases of liability) occurred prior to departure. Upon execution of third-party study abroad agreements, the participating students were responsible for contacting the provider, establishing the trip itinerary and arrangements, and seeking credit from their respective academic departments. The individual academic departments were responsible for establishing and implementing exchanges upon the execution of international exchange program agreements.

- The campus provided the names of two outbound exchange students; however, documentation for these participants was also not available from the International and Exchange Student Center or the respective academic departments.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that specific activities must occur when students are preparing to travel internationally for an off-campus activity. These activities include, but are not limited to, a mandatory pre-departure orientation, arrangement visas and insurance, a discussion of cultural differences, the attainment of waivers and health forms, guidance regarding health and safety, and application international programs’ policies and procedures.
EO 998, *Study Abroad Programs*, dated January 25, 2007, states that all CSU study abroad programs, including those offered through third-party providers where the campus approves student participation in writing, must:

- Consider the health, safety, and security of students, staff, and faculty as a central feature of planning and operation and must not operate in countries where there is a U.S. State Department “Travel Warning.”

- Provide prospective students with certain required information about the program.

- Include a pre-departure orientation about the destination including health, safety, security, and specific legal exposure or political restrictions related to their status in the country. The orientation must also include a review of CSU or campus policies and procedures for study abroad and financial information.

- Require students to carry medical insurance that will be valid in any and all host countries.

- Advise appropriate host country authorities of the program.

EO 1041, *California State University Student Travel Policy*, dated July 1, 2009, states that all students participating in CSU-affiliated programs requiring travel shall be required to acknowledge that they have been informed of the risks of travel required by such programs. The policy also requires participating students to sign a statement certifying that they have been informed of and undertake such travel voluntarily, with full knowledge of such risks, and release and hold harmless specific entities for loss arising out of, or in connection with, the student being a passenger on a flight or public livery conveyance.

Government Code §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 assistant provost stated that the organizational structure of the campus made it challenging to implement centralized control procedures. The coordinator of international programs and the assistant director of international programs stated that the International Programs Committee, which is responsible for establishing and maintaining the third-party and international exchange program agreements, might not have been fully aware of the campus, CSU, and state statutes and policies that were applicable to this area of operation.

Failure to track outbound international study abroad students jeopardizes student safety and exposes the university to liability due to misunderstandings of risks and responsibilities.
Recommendation 2

We recommend that the campus:

a. Design and implement a system to track outbound third-party study abroad and international exchange program students and perform required activities such as pre-departure orientations, determination of health insurance coverage, and academic advisement prior to departure.

b. Maintain complete documentation for all outbound exchange program participants.

Campus Response

We concur. The campus will:

a. Design and implement a system to track international exchange program students and perform required activities such as pre-departure orientations, determination of health insurance coverage, and academic advisement prior to departure. The campus has discontinued contracting with third-party study abroad providers.

Expected completion date: July 31, 2010

b. Maintain complete documentation for all outbound exchange program participants.

Expected completion date: July 31, 2010

FIELD TRIPS

Field trip policies and procedures did not provide for adequate personnel training or monitoring of department compliance.

Our review of ten field trips to off-campus locations during academic year 2008/09 disclosed that:

- The campus lacked participant documentation for six field trips. For two of these field trips, the departments destroyed the participant documentation upon completion of the trip.

- For two courses, the campus did not document participant receipt of detailed instructional agendas that should have included such items as health and safety information. The release of liability and travel authorization forms lacked field trip participants’ proper authorizing signatures.

- For one field trip, the campus lacked documented evidence that it obtained student emergency contact information prior to the start of the field trip.
CSUN’s Academic Field Trip Guidelines provides recommended procedures that shall be followed during the planning and execution of a field trip including, but not limited to, the selection of the field trip location, the design and distribution of clear and detailed agendas and emergency contingency plans. It also requires training prior to departure, students submit submission of an Academic Field Trip Waiver of Liability form before departure, filing of the Academic Field Trip Participants List with the respective academic department before departure, and review of campus and CSU conduct rules.

EO 715, California State University Risk Management Policy, dated October 27, 1999, states that the campus is responsible to manage and control risks, and that one way in which liability and exposure related to activities linked to the mission of the CSU could be minimized is the use of third-party waivers or hold harmless agreements. Additionally, the policy includes multiple guidelines to control risk in off-campus activities, and states that campus policy should address, at a minimum, the topics included in the guidelines and include a provision for documenting compliance. These guidelines include, but are not limited to, the following:

- Prepare a detailed day-to-day instructional agenda including health and safety instructions for all participants.
- Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.

The assistant provost stated that the organizational structure of the campus made it challenging to implement centralized control procedures. The interim risk manager stated that the campus does not currently have a mechanism in place that would ensure complete compliance. Several academic department chairpersons expressed that since field trips were planned at the course level, significant challenges existed to ensure that individual professors administered field trips in a manner consistent with campus, CSU, and state statutes and policies.

Failure to maintain appropriate documentation for off-campus field trips unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

**Recommendation 3**

We recommend that the campus:

a. Develop retention policies for field trip documentation and provide training to constituents on such policies.

b. Reiterate existing field trip policies and implement a process to monitor and enforce compliance with such policies.
Campus Response

We concur. The campus will:

a. Develop retention policies for field trip documentation and provide training to constituents on such policies.

   Expected completion date: September 1, 2010

b. Reiterate existing field trip policies and implement a process to monitor and enforce compliance with such policies.

   Expected completion date: September 1, 2010

COMMUNITY ENGAGEMENT AND SERVICE LEARNING

COMMUNITY PARTNER AGREEMENTS AND SITE VISITS

The campus did not perform site visits to community partner locations nor did it execute agreements with community partners.

We reviewed 15 community partners that provided internships and service learning opportunities (five and ten partners, respectively) and found that:

- The campus could not provide evidence that it performed a preliminary site visit or that it had sufficient familiarity with the community partner for any of the 15 placement opportunities.

- The campus lacked executed agreements with the community partners for any of the 15 placement opportunities.

- The campus could not provide evidence that it had sufficient insurance coverage for all five internship opportunities.

CSUN’s Managing Internship Risk, dated August 23, 2009, provides detailed procedures that shall be followed in the process of establishing, executing, and completing an internship. These include, but are not limited to, the information which must be documented according to EO 849, the system which should be used to request the initiation of an internship agreement, the clarification of the expectations of students and faculty, the process for fieldwork site selection, the requirement for student releases of liability, and the creation of a learning plan specific to the internship.

The 2002 CSU publication Best Practices for Managing Risks in Service Learning provides for site visits to community-based organizations, orientation presentations, and student placement records.
EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that the campus is responsible for managing and controlling risks.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, documents insurance requirements for agreements and contracts. It states that placement agreements for course-required work experience must be made in writing and shall specify minimum insurance requirements applicable to the contracting parties and appropriate hold harmless provisions based on the needs of the contracting parties.

The assistant provost stated that the organizational structure of the campus made implementing centralized control procedures a challenge. The interim risk manager stated that the campus does not currently have a mechanism in place that would ensure complete compliance. The manager of purchasing and contract administration stated that getting colleges and/or departments to follow campus procedures in regards to the initiation of internship agreements was difficult. Several academic department chairpersons expressed that they often bypassed the lengthy internship approval process via risk management and purchasing and contract administration, in order to offer students internships in time for them to receive course credit.

Failure to obtain appropriate agreements with internship partners affects student safety and exposes the university to liability due to misunderstandings of risks and responsibilities.

**Recommendation 4**

We recommend that the campus:

a. Perform site visits at community partner locations.
b. Obtain internship agreements for all community partners.
c. Ensure that sufficient insurance coverage is in place for all community partners.

**Campus Response**

We concur. The campus will:

a. Develop procedures to determine whether site visits are required and will document the results.

   Expected completion date: July 31, 2010

b. Develop procedures to obtain agreements with community partners that provide course-required work experience.

   Expected completion date: July 31, 2010
c. Develop procedures to ensure that sufficient insurance coverage is in place for community partners that provide course-required work experience.

   Expected completion date: July 31, 2010

**INTERNSHIP PARTICIPANT DOCUMENTATION**

The campus did not consistently perform orientations or maintain student documentation for internships.

Our review of ten internships found that:

- The respective colleges or departments did not maintain student placement records for three internships. For three additional internships, the respective colleges or departments could not produce the placement records and did not know that students had self-reported internship information to the career center. Subsequent contact with the internship providers determined that the students had performed the reported internships.

- The campus did not provide students with appropriate orientation information for two internships. This information could include health/safety instructions, codes of conduct, emergency procedures, and policies, procedures, and risks specific to the student activity.

- The campus could not provide evidence that it obtained student emergency contact information prior to the start of four internships.

- None of the participant students for three internships had release of liability forms on file.

CSUN’s *Managing Internship Risk*, dated August 23, 2009, provides detailed procedures that shall be followed in the process of establishing, executing, and completing an internship. These include, but are not limited to, the information which must be documented according to EO 849, the system which should be used to request the initiation of an internship agreement, the clarification of the expectations of students and faculty, the process for fieldwork site selection, the requirement for student releases of liability, and the creation of a learning plan specific to the internship. In the CSUN *Internship Learning Plan*, the student is required to acknowledge that he/she has participated in orientation.

The assistant provost stated that the organizational structure of the campus made it challenging to implement centralized control procedures. The interim risk manager stated that the campus does not currently have a mechanism in place that would ensure complete compliance. Several academic department chairpersons expressed that they often bypassed the lengthy internship approval process via risk management and purchasing and contract administration, in order to offer students internships in time for them to receive course credit.
Failure to maintain student program documentation and communicate appropriate information regarding policies, procedures, and risk in community engagement activities jeopardizes student safety and exposes the university to liability due to misunderstandings of risks and responsibilities.

**Recommendation 5**

We recommend that the campus retain sufficient student program documentation and perform appropriate orientations for all internships.

**Campus Response**

We concur. The campus will retain sufficient student program documentation for course-required internships at the department level.

Expected completion date: July 31, 2010

**SERVICE LEARNING COURSE AND STUDENT TRACKING**

The campus had an ineffective process for accumulating and validating service learning statistics and obtaining participant documentation for service learning activities.

Our review of service learning courses offered throughout the campus indicated that:

- The campus estimated and reported service learning projections based on dated information and inadequate documentation. Approximately five years ago, the campus discontinued coding of service learning courses and fixed service learning activity as an estimated percentage of all courses. This estimate was applied to subsequent periods to derive projected service learning activity, rather than deriving this estimate from actual numbers of students participating in service learning courses.

- The campus did not collect or maintain required participant documentation such as service learning agreements, learning plans, activity logs, or emergency contact information.

The 2002 CSU publication *Best Practices for Managing Risk in Service Learning* provides guidance for the design, implementation, and completion of community engagement activities including, but not limited to, required community partner paperwork, required student partner paperwork, the proper review process for community partners, and checklists to ensure that the campus is covering all insurance requirements.

The assistant provost stated that the organizational structure of the campus and lack of resources made it challenging to implement centralized control procedures. He also stated that the campus integrated service learning into its overall academic design. He further stated that the campus determined that offering specific course designations or other tracking methods would diminish the integration of academic/service learning throughout the campus’ offerings. The interim risk manager stated that the campus does not currently have a mechanism in place that would ensure complete
compliance. The managing director of community engagement stated that the campus’ inability to track service learning courses caused the lack of assurance for required service learning documentation.

Failure to properly track service learning activities creates misleading information on program accomplishments, places the participating students, the campus and the CSU system at risk, and jeopardizes campus credibility.

**Recommendation 6**

We recommend that the campus implement a process for accumulating and validating service learning statistics and collect and maintain required participant documentation for all service learning activities.

**Campus Response**

We concur. The campus will implement a process for accumulating and validating service learning statistics and collect and maintain required participant documentation for service learning activities.

Expected completion date: September 30, 2010
# APPENDIX A:
## PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Jolene Koester</td>
<td>President</td>
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<tr>
<td>Ed Alfano</td>
<td>Chairperson, Art Department</td>
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<tr>
<td>Bernardo Attias</td>
<td>Chairperson, Department of Communication Studies</td>
</tr>
<tr>
<td>Bob Barker</td>
<td>Associate Vice President, Financial and Accounting Services/University Controller</td>
</tr>
<tr>
<td>George Chidiac</td>
<td>Director of Purchasing and Contract Administration</td>
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<tr>
<td>Griselda Corona</td>
<td>Administrative Support Coordinator, Chicana/o Studies Department</td>
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<tr>
<td>Rasmita Dhruv</td>
<td>Administrative Support Coordinator, Anthropology Department</td>
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<tr>
<td>Nagi El Naga</td>
<td>Chairperson, Department of Electrical and Computer Engineering</td>
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<tr>
<td>Rochelle Fernandez</td>
<td>Administrative Support Assistant, Art Department</td>
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<tr>
<td>Marilyn Filbeck</td>
<td>Associate Dean, College of Health and Human Development</td>
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<tr>
<td>Craig Finney</td>
<td>Chairperson, Department of Recreation and Tourism Management</td>
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<tr>
<td>Karen Kearns</td>
<td>Associate Dean, College of Arts, Media and Communications</td>
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<tr>
<td>Marta Lopez</td>
<td>Assistant Director, International Programs</td>
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<td>Jerry Luedders</td>
<td>Assistant Provost</td>
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<tr>
<td>Howard Lutwak</td>
<td>Director of Internal Audit</td>
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<tr>
<td>Tom McCarron</td>
<td>Vice President, Administration and Finance and Chief Financial Officer</td>
</tr>
<tr>
<td>Ann Morey</td>
<td>Director, Career Center</td>
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<td>Tom Piernik</td>
<td>Director, Student Development and International Programs</td>
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<tr>
<td>Janice Potzmann</td>
<td>Assistant Director, Career Center</td>
</tr>
<tr>
<td>Mary Rueda</td>
<td>Manager, Purchasing and Contract Administration (At time of audit)</td>
</tr>
<tr>
<td>Harold Smith</td>
<td>Chairperson, Child and Adolescent Development</td>
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<tr>
<td>Justine Su</td>
<td>Coordinator of International Programs</td>
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<tr>
<td>Stella Throdoulou</td>
<td>Dean, College of Social and Behavioral Sciences</td>
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<tr>
<td>Donna Van Helsland</td>
<td>Administrative Specialist, Department of Physical Therapy</td>
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<td>Jody Van Leuven</td>
<td>Interim Risk Manager</td>
</tr>
<tr>
<td>William Watkins</td>
<td>Associate Vice President, Student Affairs</td>
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<tr>
<td>Merri Whitelock</td>
<td>Managing Director, Community Engagement</td>
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<tr>
<td>Paul Wilson</td>
<td>Interim Associate Chairperson, Biology Department</td>
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May 5, 2010

Mr. Larry Mandel, University Auditor
Office of the University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802

Subject: Campus Response to Recommendations of Audit Report Number 09-60
         Off-Campus Activities at California State University, Northridge

Dear Larry:

Enclosed please find the California State University, Northridge (CSUN) response to the recommendations of the audit, as requested in your e-mail of April 6, 2010. We have also sent this document via e-mail to adouglas@calstate.edu.

We have read the report including the observations and recommendations, and agree with them. Corrective action to implement all of the recommendations has been taken. By separate correspondence, the applicable documents evidencing completion of our implementation process and corrective action for each recommendation will be provided.

Should there be questions regarding the contents of the response, they may be addressed to Howard Lutwak, Director of Internal Audit, at (818) 677-7647.

We appreciate the recommendations to improve CSUN’s systems of internal control.

Sincerely,

[Signature]

Tom McCarron
Vice President Administration and Finance and CFO

Enclosures

cc: Dr. Jolene Koester, President
    Howard Lutwak, Director of Internal Audit
OFF-CAMPUS ACTIVITIES

CALIFORNIA STATE UNIVERSITY, NORTHRIDGE

Audit Report 09-60

STUDY ABROAD AND EXCHANGE PROGRAMS

AGREEMENTS

Recommendation 1

We recommend that the campus:

a. Implement controls to ensure that third-party study abroad and exchange program agreements are obtained, properly executed and reviewed by purchasing and contract administration, include the appropriate indemnification language, and provide for the exchange of students, materials, and equipment.

b. Determine who should sign third-party study abroad agreements and complete an official delegation of authority from the president for this purpose.

c. Establish a system to formally review international exchange program reciprocity and limit incoming and outgoing students as required.

Campus Response

We concur. The campus will:

a. Implement controls to ensure that exchange program agreements are obtained, properly executed and reviewed by purchasing and contract administration, include the appropriate indemnification language, and provide for the exchange of students, materials, and equipment.

Expected completion date: July 31, 2010

b. Discontinue contracting with third party study abroad providers.

Expected completion date: May 31, 2010

c. Establish a system to formally review international exchange program reciprocity and limit incoming and outgoing students as required.

Expected completion date: July 31, 2010
PROGRAM ADMINISTRATION

Recommendation 2

We recommend that the campus:

a. Design and implement a system to track outbound third-party study abroad and international exchange program students and perform required activities such as pre-departure orientations, determination of health insurance coverage, and academic advisement prior to departure.

b. Maintain complete documentation for all outbound exchange program participants.

Campus Response

We concur. The campus will:

a. Design and implement a system to track international exchange program students and perform required activities such as pre-departure orientations, determination of health insurance coverage, and academic advisement prior to departure. (Note: the campus has discontinued contracting with third-party study abroad providers.)

Expected completion date: July 31, 2010

b. Maintain complete documentation for all outbound exchange program participants.

Expected completion date: July 31, 2010

FIELD TRIPS

Recommendation 3

We recommend that the campus:

a. Develop retention policies for field trip documentation and provide training to constituents on such policies.

b. Reiterate existing field trip policies and implement a process to monitor and enforce compliance with such policies.

Campus Response

We concur. The campus will:

a. Develop retention policies for field trip documentation and provide training to constituents on such policies.

Expected completion date: September 1, 2010
b. Reiterate existing field trip policies and implement a process to monitor and enforce compliance with such policies.

Expected completion date: September 1, 2010

COMMUNITY ENGAGEMENT AND SERVICE LEARNING

COMMUNITY PARTNER AGREEMENTS AND SITE VISITS

Recommendation 4

We recommend that the campus:

a. Perform site visits at community partner locations.
b. Obtain internship agreements for all community partners.
c. Ensure that sufficient insurance coverage is in place for all community partners.

Campus Response

We concur. The campus will:

a. Develop procedures to determine whether site visits are required and will document the results.

Expected completion date: July 31, 2010

b. Develop procedures to obtain agreements with community partners that provide course-required work experience.

Expected completion date: July 31, 2010

c. Develop procedures to ensure that sufficient insurance coverage is in place for community partners that provide course-required work experience.

Expected completion date: July 31, 2010

INTERNSHIP PARTICIPANT DOCUMENTATION

Recommendation 5

We recommend that the campus retain sufficient student program documentation and perform appropriate orientations for all internships.
Campus Response

We concur. The campus will retain sufficient student program documentation for course-required internships at the department level.

Expected completion date: July 31, 2010

SERVICE LEARNING COURSE AND STUDENT TRACKING

Recommendation 6

We recommend that the campus implement a process for accumulating and validating service learning statistics and collect and maintain required participant documentation for all service learning activities.

Campus Response

We concur. The campus will implement a process for accumulating and validating service learning statistics and collect and maintain required participant documentation for service learning activities.

Expected completion date: September 30, 2010
June 17, 2010

MEMORANDUM

TO: Mr. Larry Mandel
University Auditor

FROM: Charles B. Reed
Chancellor

SUBJECT: Draft Final Report 09-60 on Off-Campus Activities,
California State University, Northridge

In response to your memorandum of June 17, 2010, I accept the response as submitted with the draft final report on Off-Campus Activities, California State University, Northridge.

CBR/amd