

STUDENT ACTIVITIES
SAN FRANCISCO STATE UNIVERSITY

Report Number 04-40
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ABBREVIATIONS

CAS	The Council for the Advancement of Standards in Higher Education
CEASE	Creating Empowerment Through Alcohol and Substance Abuse Education (SFSU program in Counseling and Psychological Services)
CSU	California State University
DoIT	Division of Information Technology
GC	Government Code
IP	Internet protocol
IRA	Instructionally Related Activities
OSPLD	Office of Student Programs/Leadership Development
SAM	State Administrative Manual
SFAC	Student Fee Advisory Committee
SFSU	San Francisco State University
SNAPS	Student Needs and Priorities Survey
SUAM	State University Administrative Manual

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2002, the Board of Trustees, at its January 2004 meeting, directed that *Student Activities* be reviewed. Student Activities was partially audited in 1980 in a sequence of audits on Instructionally Related Activities fees.

We visited the San Francisco State University (SFSU) campus from July 19, 2004, through August 20, 2004, and audited the procedures in effect at that time.

In our opinion, existing policies and procedures at SFSU provided a reasonable level of control over student organizations, student activities and events, and student discipline.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

GENERAL ENVIRONMENT [8]

Student activities had not been evaluated using self-assessment instruments similar to those provided by The Council for the Advancement of Standards in Higher Education (CAS). In addition, the SFSU *Student Handbook* was outdated.

STUDENT ORGANIZATIONS [9]

Student club/organization files did not always evidence compliance with recognition requirements, while requirements for student organization recognition and risk mitigation for the men's volleyball club sports team were unclear. A review of student club/organization files disclosed that officer names were lined out on student organization registration forms without an annotation of the circumstances and effective date of the action; club/organization constitutions were missing, unsigned, not dated, or outdated; and evidence was unavailable to show that officers had attended mandatory orientation sessions. The men's volleyball team was not a recognized student organization, could not provide adequate proof of insurance, and was not monitored by the campus to ensure completion of participant liability waivers and defensive driver training. In addition, the availability and involvement of student club/organization advisors needed improvement. Interviews with ten club advisors disclosed that the campus did not have arrangements for alternates when advisors were inaccessible for extended periods, some advisors were more active than others in interacting with student clubs/organizations, and orientation and training of advisors occurred informally and mainly on an individual basis.

ACTIVITY/EVENT MANAGEMENT [13]

The campus had not approved the intramural sport participant liability waiver form, nor established corresponding document retention requirements. The campus was using an intramural sport participant liability waiver form that had been introduced by the current director of intramurals/recreation based on a form used by one of her former university employers; and at the end of the spring 2004 semester, waiver forms for all intramural seasons prior to spring 2004 had been discarded. In addition, an unauthorized

intramural sport forfeit fee was being charged and the campus had not established approved procedures for collection, deposit, and disposition of the fee revenue.

STUDENT JUDICIARY [16]

Notices received by the Division of Information Technology (DoIT) for questionable downloading of copyrighted music and videos by students were not shared with the student judicial officer, which increased the risk that multiple violations or repeat offenders would not be identified for possible disciplinary sanction. During the eight-month period beginning December 2003 through July 2004, DoIT received 18 notices, predominantly from the Recording Industry Association of America and Universal Studios, regarding copyright infringement for downloaded music and videos.

INTRODUCTION

BACKGROUND

The 2003 *Book of Professional Standards for Higher Education* by The Council for the Advancement of Standards in Higher Education (CAS) states that campus activities are the combined efforts of clubs and organizations established for and/or by students. CAS published these standards for educators and policy-makers based on input from multiple industry experts since approximately 1986. The most recent CAS publication (2003) contains 29 functional area standards, including campus activities, fraternity and sorority advising, judicial programs, and recreational sports programs. One stated purpose of these standards is to provide practitioners with industry best practices that any college or university program can achieve.

Many auxiliary organizations in the California State University (CSU), notably the associated students and student unions, are integrally involved with student activities. The associated students typically provide funding from student body organization fees to student organizations that are chartered/recognized by the campus. Student unions develop and market programs primarily for students. Both auxiliary organizations fund or co-sponsor specific events, at which students are the primary participants.

On a systemwide basis, the CSU conducts a Student Needs and Priorities Survey (SNAPS) approximately once every five years. The SNAPS includes evaluations for certain student activities-related factors, and the students are requested to prioritize functions, activities, and services in the order of importance to them, as well as assign a quality rank. There are four student activities-related factors evaluated in SNAPS as follows:

- ▶ Student clubs and organizations.
- ▶ Recreational programs and/or activities.
- ▶ Student union activities.
- ▶ Fraternities and sororities.

In the 1989 SNAPS, these factors were ranked in the bottom quartile in terms of importance to the students in meeting their educational objectives. The highest quality rating was given to student clubs and organizations.

At San Francisco State University (SFSU), there are currently 238 chartered/recognized student clubs and organizations with a student population of approximately 29,700. There were statistics maintained by the campus on the type or volume of student activities. For fall 2003, the campus office of student programs/leadership development (OSPLD) reported 2,535 outdoor events and 1,076 indoor events.

In a September 2002 article entitled, "Who's Responsible for Student Clubs?," United Educators describes the relationship between student clubs and the institution as follows:

Some institutions assume close supervision over student clubs, others take a more distant stance, and still others blend the two approaches. At the two extremes, the two approaches are sometimes termed "hands-on" and "hands-off." In between is a hybrid model, an "arm's-length relationship," in which

the institution controls some aspects of student activities, but leaves others for the clubs to manage. None of the methods is foolproof.

Institutions that implement the hands-off model frequently do so, among other reasons, to insulate themselves from potential liability. Some legal experts, however, question this strategy's effectiveness. They believe that a court would find a university had a duty to manage a student club regardless of the formal limits on institutional control. (It is, of course, difficult to predict legal outcomes in the abstract, because factors such as state law and the precise facts of a dispute carry enormous weight.) At the other end of the control spectrum, the hands-on approach may be desirable but impractical due to resource limitations.

Institutions will have to decide where they should be along this control spectrum, and with the advice of legal counsel, consider developing a consistent overall approach to managing student clubs. Additionally, it might be advisable for that policy to address such issues as the use of the institution's name, logo, and resources.

At SFSU, the campus position on off-campus events/activities was described in the *Student Handbook* as follows: "The university assumes no responsibility or liability for activities conducted by student organizations off campus." However, the campus meets with student organizations that plan involvement in off-campus demonstrations, protests, or marches. The campus also prescribed policy for off-campus student organization events that involved alcohol.

In November 2000, the chancellor appointed a committee to review the CSU's alcohol policies and prevention programs. The committee's final report was presented to the Board of Trustees in July 2001. At that board meeting, the Trustees passed a resolution (Resolution of the Committee on Educational Policy 07-01-03) to adopt and implement the committee's recommendations. These recommendations included policy directions, activation of alcohol advisory councils on each campus, mechanisms for assessing and reporting on program outcomes, and resource commitments. At the July 2003 meeting, the Trustees received, as an information item, the first biennial report on the CSU's alcohol policies and prevention program.

Pursuant to Education Code §66017 and §66300, the CSU Trustees adopted Title V §41301 - §41304 that defines the student code of conduct and establishes the basis for administratively sanctioning violations through such means as probation, suspension, or expulsion. The various causes for student discipline include academic dishonesty, obstruction or disruption of the educational process, unauthorized use of or damage to property, abusive behavior such as hazing, and violation of any order of a campus president. CSU systemwide requirements on student discipline are addressed in Executive Order 628, *Student Disciplinary Procedures*, dated September 30, 1994. Other guidance is provided through the CSU General Counsel's *Student Disciplinary Manual* issued in November 1994.

At SFSU, the campus annually handled approximately 170 student judicial cases. In fiscal year 2002/03, the following administrative sanctions were imposed for student discipline:

SANCTION	NUMBER
Expulsion	1
Suspension	12
Probation	61
Other	138
Total	212

Other sanctions included such things as community service, counseling, and restitution. The majority of student disciplinary proceedings at SFSU are handled by conference. Since the beginning of fiscal year 2002/03, there have been two disciplinary hearings, and the campus did have hearing officers appointed and trained.

Title V §41401 addresses student elections. An uncoded memorandum to campus presidents entitled *Minimum Academic Qualifications for Student Office Holders*, dated August 29, 1997, identifies requirements for election candidates and incumbent office holders, such as grade point average and unit loads.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Student Activities* and to determine the adequacy of controls over the related processes to 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:

- ▶ Administration of student activities provides effective operating controls and governance processes, clear lines of organizational authority, and documented policies and procedures.
- ▶ The campus has recently completed or undertaken initiatives to improve student activities operations and maximize resources, and adopted best practices inherent in student activities industry standards.
- ▶ Qualified individuals and volunteers are used to adequately staff student activities programs.
- ▶ Student privacy is adequately protected from inappropriate disclosure of club/organization affiliation and activity participation.
- ▶ Policies and procedures prohibit discrimination in recognition of student organizations but include reasonable measures for detection/prevention of unauthorized group affiliations.
- ▶ Students are adequately informed of the existence of student clubs/organizations and participation opportunities.
- ▶ Student office holders are elected under reasonable procedures and meet eligibility qualifications.

- ▶ Roles and responsibilities of faculty/staff advisors to student clubs and organizations are defined, and expectations are understood.
- ▶ Prohibitions against discrimination and hazing have been communicated and are being monitored, and CSU alcohol/drug policies and prevention programs have been integrated into student activities.
- ▶ Reasonable procedures for prevention, discovery, and disposition of unapproved student activities have been established.
- ▶ Student activities are properly supervised and evaluated, and rules and regulations for student safety in activities/events have been established and enforced.
- ▶ CSU requirements for disciplinary proceedings are followed, and disciplinary sanctions have been equitable/fair and student rights protected.
- ▶ Recent prohibitions against unauthorized use of academic presentations for commercial purposes have been implemented.

SCOPE AND METHODOLOGY

The proposed scope of the audit, as presented in Attachment B, Agenda Item 2 of the January 27-28, 2004, meeting of the Committee on Audit, stated that *Student Activities* includes activities relating to social and co-curricular programs, recreational sports, clubs, organizations, and student judicial review. Potential impacts include inappropriate activities, personal injury, and litigation. Student activities administered solely by CSU auxiliary organizations have been excluded from this review.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that 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. Industrywide standards were also considered. The audit review period was fiscal year 2002/03 to date. At SFSU, the office of student programs/leadership development reporting through the associate vice president of student affairs/director, counseling and psychological services to the vice president of student affairs/dean of students has overall responsibility for student activities. The coordinator of student discipline (judicial affairs officer) also reports to the vice president of student affairs/dean of students.

We focused primarily upon the internal administrative, compliance, and operational controls over student activities management. Specifically, we reviewed and tested:

- ▶ Student activities policies and procedures.
- ▶ Student activities staffing and organization plans.
- ▶ Chartering/recognition of student clubs and organizations.
- ▶ The processes for planning, approving, and supervising student activities.
- ▶ Student election procedures and monitoring.

- ▶ Student judicial activity.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

SELF-ASSESSMENT

Student activities had not been evaluated using self-assessment instruments similar to those provided by The Council for the Advancement of Standards in Higher Education (CAS).

We noted that student activities had only been evaluated through the campus accreditation process and other non-CAS means, such as a retreat of student leaders and staff in October 2002. In addition, the director of the office of student programs/leadership development (OSPLD) had begun preparing an annual report in spring 2003.

According to the 2003 *Book of Professional Standards for Higher Education*, CAS has specifically established self-assessment guides for each set of standards and recommended a seven-step process for implementation. These steps range from establishing a self-assessment team to preparing an action plan for program enhancement.

The vice president of student affairs/dean of students stated her belief that the CAS standards may not benefit the campus.

Absence of program self-assessment and comparison with industry standards increases the risk that program improvements will not occur and student activities resources will not be maximized.

Recommendation 1

We recommend that the campus periodically provide for self-assessment of student activities using a format/process similar to the CAS standards, and complete the first scheduled self-assessment as soon as possible.

Campus Response

We concur. The vice president of student affairs will establish a self-assessment plan, which will incorporate some ideas from the Student Needs and Priorities Survey (SNAPS) and CAS standards. The self-assessment plan will be conducted every five years.

STUDENT HANDBOOK

The San Francisco State University (SFSU) *Student Handbook* was outdated.

Campus policies and procedures for student activities and student organizations were compiled in the SFSU *Student Handbook* issued by OSPLD. The handbook was normally available online and as a handout for student officers attending mandatory orientation. However, during our review, the

handbook had been taken offline and links to the OSPLD website were inoperable. The hard copy of the handbook indicated that it was issued sometime prior to January 2003.

Government Code (GC) §13402 states that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions.

The OSPLD director stated that the *Student Handbook* was in the process of being updated based on importance of policy; however, several policy updates required coordination with other campus offices.

Outdated policies increase the risk of misunderstandings and inconsistencies and may adversely affect the quality of student activities.

Recommendation 2

We recommend that the campus update the *Student Handbook* and reissue it at the earliest possible date.

Campus Response

We concur. The first draft of the revised *Student Handbook* is complete; it will be edited prior to publication and distribution. Expected completion date: March 2005.

STUDENT ORGANIZATIONS

REGISTRATION DOCUMENTS

Student club/organization files did not always evidence compliance with recognition requirements.

Our review of 24 OSPLD student club/organization files disclosed that:

- ▶ In 13 instances, officer names were lined out on the student organization registration form without an annotation of the circumstances and effective date of the action.
- ▶ Eight clubs/organizations did not have a constitution on file. In 11 other instances, the constitution was not signed or dated. In four cases, the constitutions were old, with the oldest being filed in 1974.
- ▶ In 11 instances, there was no evidence that club/organization officers had attended one of the mandatory OSPLD orientation sessions.

GC §13402 states that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system

requirements, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Sound business practice mandates adequate controls to ensure required documents are obtained and properly completed.

The OSPLD director stated that the incomplete files were the result of changes being implemented in the design of forms and documentation practices.

Failure to obtain required documentation or properly complete documents increases the risk that clubs will be improperly/imprudently recognized.

Recommendation 3

We recommend that the campus strengthen controls to ensure that student organization files contain:

- a. An explanation and effective date of action for any changes.
- b. Required constitutions that have been authenticated and validated.
- c. Evidence that club officials attended mandatory orientation.

Campus Response

We concur with the recommendation and have implemented the following:

- a. Changes to student organization files require written documentation from the student organization president. Emails and reasons for lined-out items are documented and placed in the file. This policy is included in the revised *Student Handbook*.
- b. OSPLD continues to verify that each registered student organization has an approved constitution on file. As indicated in the *Student Handbook*, a student organization will not be allowed to register without a constitution on file. At least one-half of student organization files will be reviewed by May 30, 2005.
- c. Effective fall 2004 semester, all student club officers are required to attend a mandatory orientation, which OSPLD conducts throughout the year. All student club officers are required to sign an orientation log sheet at the mandatory orientation. In addition, as part of the student club registration process, the director of OSPLD reviews the orientation log sheet and records the date on the student club registration form. The revised *Student Handbook* includes a policy requiring student club officers to attend mandatory orientation.

MEN'S VOLLEYBALL

Requirements for student organization recognition and risk mitigation for the men's volleyball club sports team were unclear.

Men's volleyball was the sole remaining club sports team at SFSU. During the spring semester, the team competed as part of the Northern California Collegiate Volleyball League in matches and tournaments held both on and off campus. At the end of the fiscal year 2003/04 season, the team also flew to a national tournament in Charlotte, North Carolina.

We noted that the men's volleyball club was not:

- ▶ Recognized by the campus as a student organization.
- ▶ Insured with a policy funded by instructionally related activities (IRA) fee revenue.
- ▶ Monitored by the campus to ensure completion of participant liability waivers and defensive driver training for those involved in providing transportation by private vehicles to off-campus competitions.

The SFSU *Student Handbook* states that responsibility for all co-curricular activities, including student organizations, has been delegated to OSPLD. OSPLD discharges this responsibility by registering student organizations and approving on-campus activities/events.

State University Administrative Manual (SUAM) §3726.14 states that the cost of insurance for extramural athletics (club sports) shall be paid from the IRA fee revenue. In fiscal year 2003/04, SFSU levied an IRA fee of \$70 per student.

Executive Order 715, *California State University (CSU) Risk Management Policy*, dated October 27, 1999, states that the campus risk management policy should include methods of controlling risks and should provide guidelines developed by the systemwide office in consultation with campus risk managers/coordinators to assist campuses in developing campus-specific policies, which include health and safety for on- and off-campus activities.

The advisor/coach of the men's volleyball club sports team stated that they no longer worked with OSPLD, because the orientation meetings were too far in advance of league activity. The director of risk management stated that men's volleyball may be covered under the general campus liability policy. The director of environmental health and occupational safety stated that, based on inquiries, the men's volleyball team would not require defensive driver training, because it did not represent the university.

Ambiguity over the status and monitoring of the men's volleyball club sports team increases the potential for loss to the campus and the CSU, and may unnecessarily expose participating students to undue risk.

Recommendation 4

We recommend that the campus:

- a. Register the men's volleyball club sports teams as a student organization.
- b. Fund the cost of insurance coverage for club sports from IRA fee revenue.
- c. Determine if completion of liability waiver forms and defensive driver training is appropriate for men's volleyball team participants and drivers and, if warranted, monitor and document liability waiver form and defensive driver training completion, and establish a corresponding document retention policy.

Campus Response

We concur. In the interim, the campus has placed an administrative hold on registering and recognizing club sports. The president's cabinet has agreed to form a task force to review the future of club sports at SFSU and the recommendations cited during the Student Activities audit. The vice president of student affairs/dean of students will form the task force with the goal of presenting a recommendation to the president's cabinet by the end of the spring 2005 semester.

Should the campus decide to continue with club sports, the campus will:

- a. Register the men's volleyball club as a student organization.
- b. Determine a cost-efficient way to provide insurance coverage for club sports.
- c. Determine if liability waiver forms and defensive driver training is appropriate for the men's volleyball team participants and drivers and, if warranted, monitor and document liability waiver forms and defensive driver training completion, and establish a corresponding document retention policy.

Expected completion date: June 2005.

ADVISORS

The availability and involvement of student club/organization advisors was in need of improvement.

Interviews with ten club advisors disclosed that:

- ▶ The campus did not have arrangements for alternates if the advisors were going to be inaccessible for extended periods. One advisor was on maternity leave in spring 2004 and another was on sabbatical and out of the country.
- ▶ Some advisors were more active than others in interacting with student clubs/organizations.
- ▶ Orientation and training of advisors occurred informally and mainly on an individual basis.

- ▶ One advisor who had signed the club's application for recognition did not acknowledge advisor responsibilities.

The *SFSU Student Handbook* recognizes that effective advising to student clubs/organizations is essential to their success. Examples of advisor involvement include assistance in goal-setting, membership continuity, team building, and leadership; and attendance at club meetings and events.

The OSPLD director stated that although advisors were encouraged to meet regularly, management was considering improvements to increase availability and involvement of advisors.

Inadequate advising increases the risk of inappropriate activities and programming by student clubs/organizations, and jeopardizes student involvement opportunities.

Recommendation 5

We recommend that the campus:

- a. Develop a strategy for identifying advisors who do not meet expectations and an action plan to either encourage greater involvement or seek a replacement.
- b. Establish a policy for designating alternates during extended advisor absences.
- c. Provide formal orientation and training for advisors.

Campus Response

We concur. OSPLD is developing a welcome packet that describes the faculty/staff advisor's role and responsibility. As part of a student organization's registration packet to be returned to OSPLD for registration, a form will be attached for the faculty/staff advisor to complete and indicate planned absences and/or leave for the academic year. A formal orientation and training for faculty/staff advisors will be implemented effective the fall 2005 semester. As part of the formal orientation, faculty/staff advisors will be informed of their responsibilities and the importance of their roles as advisors. Expected completion date: June 2005.

ACTIVITY/EVENT MANAGEMENT

INTRAMURAL SPORTS — LIABILITY WAIVER

The campus had not approved the intramural sport participant liability waiver form, nor established corresponding document retention requirements.

Intramural sports at SFSU were administered by the kinesiology department in the College of Health and Human Services. We noted that the department used an intramural sport participant liability waiver form that had been introduced by the current director of intramurals/recreation based on a form used by one of her former university employers. In addition, at the end of the spring 2004 semester, waiver forms for all intramural seasons prior to spring 2004 had been discarded.

Executive Order 715, *CSU Risk Management Policy*, dated October 27, 1999, states that each president shall develop campus risk management policies and procedures that include an ongoing process by which appropriate administrators identify risks; perform analysis of the frequency and severity of potential risks; select the best risk management techniques to manage the risk without unduly curtailing or modifying activities necessary to the CSU mission; implement appropriate risk management techniques and staffing standards; and monitor, evaluate, and document the results.

SFSU recently developed a liability waiver (release and hold harmless agreement) for field trips and stipulated that these forms have to be retained for at least two years. It was generally agreed that applying this waiver language and record retention provision would be beneficial to intramurals.

The director of risk management stated that he was unaware of the liability waiver form used for intramural sports. The director of intramurals/recreation stated that she had never received any direction from the campus on waiver retention.

The absence of an adequate participant waiver form and corresponding retention requirements unnecessarily exposes the CSU to potential liability.

Recommendation 6

We recommend that the campus:

- a. Review, modify as warranted, and approve the language used in intramural waiver forms.
- b. Establish document retention requirements for intramural participant waiver forms.

Campus Response

- a. We concur with the recommendation that the liability waiver forms used for participants in intramural sports be reviewed and modified. As of the fall 2004 semester, the intramural office has implemented and will continue to use a new liability waiver form based on guidelines from the safety and risk management office. The modified waiver form language has been approved by risk management. Each participant must sign the waiver form before they play in their first game.
- b. We concur with the recommendation to establish a document retention system for the intramural participant waiver form. We will keep all documents on record in the office of the recreation/intramural director for a period of two years, in accordance with safety and risk management guidelines.

INTRAMURAL SPORTS — FORFEIT FEE

The intramural sports forfeit fee had not been authorized, and the campus had not established approved procedures for collection, deposit, and disposition of the fee revenue.

Teams were required to pay a mandatory \$20 forfeit fee to participate in intramural sports at SFSU. Per the SFSU *Intramural Sports Handbook*, this fee was refundable at the end of the season only if the team did not forfeit any games. Otherwise, the first forfeit by a team resulted in a loss of \$10, and a second forfeit resulted in the loss of another \$10 and disqualification from the league. A forfeit occurred when the team did not show up for a scheduled competition, there were low ratings in sportsmanship behavior or conduct, or a team used an ineligible player.

We noted that approximately \$3,100 in forfeit fees would have been collected in fiscal year 2003/04, based on the number of teams participating in intramural leagues. The teams paid the forfeit fees to the director of intramurals/recreation, who held the money during the season. The funds were not deposited when collected. Team managers signed for receipt of any refunds at the end of the season. Amounts forfeited were used at the discretion of the director for such purposes as season-ending pizza parties for intramural student assistants that officiate or keep score. In addition, there was no recap of how much was refunded, forfeited, or spent.

Standing Orders of the CSU Board of Trustees, §II.i., states that the chancellor is responsible for establishment and oversight of campus fees. This authority has not been delegated.

State Administrative Manual (SAM) §8032.1 requires that receipts be deposited in a timely and economical manner.

GC §13402 states that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. GC §13403 defines internal accounting and administrative controls and sets forth the elements of a satisfactory system of internal control, which shall include:

- ▶ A plan of organization that provides segregation of duties appropriate for proper safeguarding of state assets.
- ▶ A system of authorization and recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The director of intramurals/recreation stated that she had never received any direction from the campus on forfeit fees.

Lack of accountability over fee assessments increases the risk of misappropriation or loss of funds and inappropriate expenditures.

Recommendation 7

We recommend that the campus:

- a. Obtain authorization for the intramural forfeit fee.
- b. Review and approve procedures for collection, deposit, and disposition of intramural forfeit fee revenue.

Campus Response

- a. We concur. We will obtain proper authorization for the intramural forfeit fee through the Student Fee Advisory Committee (SFAC). We have started the process of presenting the forfeit fee to SFAC. Expected completion date: May 2005.
- b. We concur. The intramural office, working with the accounting and bursar's offices, will develop collection, deposit, and disposition procedures for approval by the associate vice president of fiscal affairs/controller. Expected completion date: May 2005.

STUDENT JUDICIARY

Notices received by the Division of Information Technology (DoIT) for questionable downloading of copyrighted music and videos by students were not shared with the student judicial officer.

We noted that during the eight-month period beginning December 2003 through July 2004, DoIT received 18 notices, predominantly from the Recording Industry Association of America and Universal Studios, regarding copyright infringement for downloaded music and videos. DoIT's response to these notices was to block the Internet protocol (IP) address or shut down the account involved. However, the notices were never shared with the student judicial officer.

In order to obtain a SFSU Internet account, users must acknowledge an understanding of regulations and responsibilities, including those contained in a Computer Ethics and Security document. This document states that users of university computing resources may not access copyrighted material belonging to others without the permission of the copyright owner. Students acknowledge that non-compliance with copyright regulations may be a violation of the Student Code of Conduct and subject them to student discipline.

Title 5 §41301(g) indicates that unauthorized use of, or misuse of, campus property is a violation of the Student Code of Conduct. SFSU Office of the President memorandum dated July 1, 2004, charged the student judicial officer with the responsibility for implementing the student discipline program.

The DoIT executive director stated that copyright notices had not been shared with the student judicial officer, because the notices had not involved repeat offenders.

Lack of adequate notification for copyright infringements increases the risk that multiple violations or repeat offenders would not be identified for possible disciplinary sanction.

Recommendation 8

We recommend that DoIT forward notices of copyright infringements and other computer network violations by students to the student judicial officer.

Campus Response

We concur. The office of student judicial affairs and DoIT are working together to formalize procedures to ensure that notices of copyright infringements and other computer network violations are forwarded to the judicial affairs office. Expected completion date: April 2005.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Robert A. Corrigan	President
Agnes Barin	Administrative Support Coordinator, Office of Student Programs/ Leadership Development (OSPLD)
Joe Benjamin	Academic Counselor, Undergraduate Advising Center and Advisor to the Iota Phi Theta Fraternity
Steve Blecha	Academic Personnel Assistant, Human Resources and Safety and Risk Management, and Advisor/Coach, Men's Volleyball Club Sports Team
Kevin Bowman	Associate Vice President for Student Affairs/ Director, Counseling and Psychological Services
Lilia Chavez	Director, OSPLD
Donna Cunningham	Judicial Affairs Officer
Guy Dalpe	Managing Director, Cesar Chavez Student Center
Irene Donner	Administrative Support Coordinator, Internal Audit
Denise Fox-Needleman	Associate Vice President for Human Resources and Safety and Risk Management
Maria Garcia	Risk Services Associate
Trevor Getz	Associate Professor – History Department and Advisor to the Pi Kappa Phi Fraternity
Ricardo Gomes	Chair, Design and Industry Department and Advisor to the Organization of Black Designers
Martha Gorzycki	Assistant Professor, Cinema Department and Advisor to The Sequential Art and Literature Society
Mary Keller	Assistant Director for Program Services, Cesar Chavez Student Center
Karen Kingsbury	Director, Orientation and Retention and Advisor to the Gator Aider Club
Peter Koo	Executive Director, Associated Students Inc.
Mohammad Kowsar	Professor, Theatre Arts Department and Advisor to the Theatre Arts Graduate Students Association
Phoebe Kwan	Executive Director, Division of Information Technology (DoIT)
Josh Levine	Lecturer in Composition, Theory and Electronic Music and Advisor to the Music Club
Franz Lozano	Associate Internal Auditor (at time of review)
Michael Martin	Director of Risk Management
Rafael Martinez	Program Coordinator, OSPLD and Advisor to the Hip Hop Coalition
Frances McGowan	Associate Director, Registrar's Office
Linda Medina-Sam	Risk Services Coordinator
Paula Moran	Lecturer, Kinesiology Department and Director, Intramurals/Recreation
Leroy Morishita	Vice President, Administration and Finance
Hong Nguyen	Business Office Manager, Associated Students Inc.
Bill Nichols	Professor, Cinema Department and Advisor to the Cinema Studies Graduate Student Association
Michael Ritter	Coordinator, Prevention Education Programs/CEASE Program
Donna Ryan	Manager, Employment and Compensation
J. E. "Penny" Saffold	Vice President for Student Affairs and Dean of Students

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Jennifer Schwartz	Sergeant, Public Safety
Robert Shearer	Director, Environmental Health and Occupational Safety
Bitia Shooshani	Prevention Education, Counseling and Psychological Services
Bob Spina	Chair, Kinesiology Department
Allyson Tintiangco-Cubales	Assistant Professor, Asian American Studies and Advisor to the League of Filipino Students
Jim Van Ness	Internal Auditor (at time of review)
Larry Ware	Associate Vice President for Fiscal Affairs and Controller



San Francisco
State University

Office of the President

1600 Holloway Avenue
San Francisco, California 94132

Tel: 415/338-1381

Fax: 415/338-6210

February 21, 2005

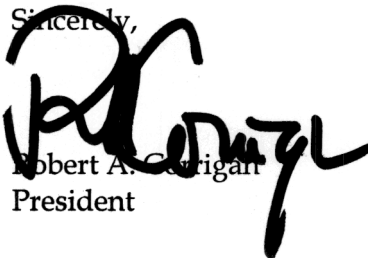
Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore
Long Beach, California 90802-4210



Dear Mr. Mandel:

We have reviewed the Office of the University Auditor Report #04-40 on Student Activities at San Francisco State University. The report identified areas where additional efforts are needed, and we are taking actions to implement the recommendations. Documentation demonstrating implementation of recommendations already completed will be forwarded to you separately.

Our responses to the recommendations are attached. The campus Internal Auditor will also forward the responses to you electronically to facilitate the response process. Questions regarding the responses may be directed to Leroy M. Morishita, Vice President for Administration and Finance, at 415/338-2521 or Franz Lozano, Internal Auditor, at 415/405-3736.

Sincerely,

Robert A. Corrigan
President

FL/id

Attachments

- cc: J.E. "Penny" Saffold, Vice President, Student Affairs
Leroy M. Morishita, Vice President, Administration and Finance
Kevin Bowman, Associate Vice President, Student Affairs/Director, Counseling & Psychological Services
Lilia Chavez, Director, Office of Student Programs/Leadership Development
Donna Cunningham, Judicial Affairs Officer, Student Affairs
Bob Spina, Chair, Kinesiology
Paula Moran, Director, Intramural Sports/Lecturer, Kinesiology
Franz Lozano, Internal Auditor
Jim Van Ness, Senior Audit Consultant

STUDENT ACTIVITIES

SAN FRANCISCO STATE UNIVERSITY

Report Number 04-40

GENERAL ENVIRONMENT

SELF-ASSESSMENT

Recommendation 1

We recommend that the campus periodically provide for self-assessment of student activities using a format/process similar to the CAS standards, and complete the first scheduled self-assessment as soon as possible.

Campus Response

We concur. The Vice President for Student Affairs will establish a self-assessment plan, which will incorporate some ideas from the Student Needs and Priorities Survey (SNAPS) and CAS standards. The self-assessment plan will be conducted every 5 years.

STUDENT HANDBOOK

Recommendation 2

We recommend that the campus update the *Student Handbook* and reissue it at the earliest possible date.

Campus Response

We concur. The first draft of the revised Student Handbook is complete; it will be edited prior to publication and distribution. Expected completion date: March 2005.

STUDENT ORGANIZATIONS

REGISTRATION DOCUMENTS

Recommendation 3

We recommend that the campus strengthen controls to ensure that student organization files contain:

- a. An explanation and effective date of action for any changes.
- b. Required constitutions that have been authenticated and validated.
- c. Evidence that club officials attended mandatory orientation.

Campus Response

We concur with the recommendation and have implemented the following:

- a. Changes to student organization files require written documentation from the student organization president. Emails and reasons for lined-out items are documented and placed in the file. This policy is included in the revised Student Handbook.
- b. OSPLD continues to verify that each registered student organization has an approved constitution on file. As indicated in the Student Handbook, a student organization will not be allowed to register without a constitution on file. At least one-half of student organization files will be reviewed by May 30, 2005.
- c. Effective Fall 2004 semester, all student club officers are required to attend a mandatory orientation, which OSPLD conducts throughout the year. All student club officers are required to sign an orientation log sheet at the mandatory orientation. In addition, as part of the student club registration process, the Director of OSPLD reviews the orientation log sheet and records the date on the student club registration form. The revised Student Handbook includes a policy requiring student club officers to attend mandatory orientation.

MEN'S VOLLEYBALL**Recommendation 4**

We recommend that the campus:

- a. Register the men's volleyball club sports teams as a student organization.
- b. Fund the cost of insurance coverage for club sports from IRA fee revenue.
- c. Determine if completion of liability waiver forms and defensive driver training is appropriate for men's volleyball team participants and drivers and, if warranted, monitor and document liability waiver form and defensive driver training completion, and establish a corresponding document retention policy.

Campus Response

We concur. In the interim, the campus has placed an administrative hold on registering and recognizing club sports. The President's Cabinet has agreed to form a task force to review the future of club sports at San Francisco State University and the recommendations cited during the Student Activities audit. The Vice President for Student Affairs/Dean of Students will form the task force with the goal of presenting a recommendation to the President's Cabinet by the end of the Spring 2005 semester.

Should the campus decide to continue with club sports, the campus will:

- a. Register the men's volleyball club as a student organization;
- b. Determine a cost efficient way to provide insurance coverage for club sports; and

- c. Determine if liability waiver forms and defensive driver training is appropriate for the men's volleyball team participants and drivers and, if warranted, monitor and document liability waiver forms and defensive driver training completion, and establish a corresponding document retention policy.

Expected completion date: June 2005.

ADVISORS

Recommendation 5

We recommend that the campus:

- a. Develop a strategy for identifying advisors who do not meet expectations and an action plan to either encourage greater involvement or seek a replacement.
- b. Establish a policy for designating alternates during extended advisor absences.
- c. Provide formal orientation and training for advisors.

Campus Response

We concur. OSPLD is developing a welcome packet that describes the faculty/staff advisor's role and responsibility. As part of a student organization's registration packet to be returned to OSPLD for registration, a form will be attached for the faculty/staff advisor to complete and indicate planned absences and/or leave for the academic year. A formal orientation and training for faculty/staff advisors will be implemented effective Fall 2005 semester. As part of the formal orientation, faculty/staff advisors will be informed of their responsibilities and the importance of their roles as advisors. Expected completion date: June 2005.

ACTIVITY/EVENT MANAGEMENT

INTRAMURAL SPORTS — LIABILITY WAIVER

Recommendation 6

We recommend that the campus:

- a. Review, modify as warranted, and approve the language used in intramural waiver forms.
- b. Establish document retention requirements for intramural participant waiver forms.

Campus Response

- a. We concur with the recommendation that the liability waiver forms used for the participants in intramural sports be reviewed and modified. As of the Fall 2004 semester, the Intramural Office has implemented and will continue to use a new liability waiver form based on guidelines from the Safety and Risk Management Office. The modified waiver form language has been approved

by Risk Management. Each participant must sign the waiver form before they play in their first game.

- b. We concur with the recommendation to establish a document retention system for the intramural participant waiver form. We will keep all documents on record in the office of the Recreation/Intramural Director for a period of two years, in accordance with the Safety and Risk Management guidelines.

INTRAMURAL SPORTS – FORFEIT FEE

Recommendation 7

We recommend that the campus:

- a. Obtain authorization for the intramural forfeit fee.
- b. Review and approve procedures for collection, deposit, and disposition of intramural forfeit fee revenue.

Campus Response

- a. We concur. We will obtain proper authorization for the intramural forfeit fee through the Student Fee Advisory Committee (SFAC). We have started the process of presenting the forfeit fee to the SFAC. Expected completion date: May 2005.
- b. We concur. The Intramural Office, working with the Accounting and Bursar's offices, will develop collection, deposit, and disposition procedures for approval by the AVP of Fiscal Affairs/Controller. Expected completion date: May 2005.

STUDENT JUDICIARY

Recommendation 8

We recommend that DoIT forward notices of copyright infringements and other computer network violations by students to the student judicial officer.

Campus Response

We concur. The Office of Student Judicial Affairs and Division of Information Technology are working together to formalize procedures to ensure that notices of copyright infringements and other computer network violations are forwarded to the Judicial Affairs Office. Expected completion date: April 2005.



THE CALIFORNIA STATE UNIVERSITY

 OFFICE OF THE CHANCELLOR

BAKERSFIELD

March 15, 2005

CHANNEL ISLANDS

CHICO

DOMINGUEZ HILLS

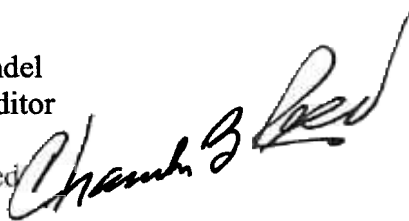
MEMORANDUM

FRESNO

FULLERTON

TO: Mr. Larry Mandel
University Auditor

HAYWARD

FROM: Charles B. Reed 
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 04-40 on *Student Activities*,
San Francisco State University

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

In response to your memorandum of March 15, 2005, I accept the response as submitted with the draft final report on *Student Activities*, San Francisco State University.

NORTHRIDGE

POMONA

SACRAMENTO

CBR/aml

SAN BERNARDINO

Enclosure

SAN DIEGO

cc: Dr. Robert A. Corrigan, President
Mr. Franz Lozano, Internal Auditor

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS