

DELEGATIONS OF AUTHORITY
CALIFORNIA STATE UNIVERSITY,
LONG BEACH

Audit Report 11-21
May 6, 2011

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CONTENTS

Executive Summary	1
Introduction.....	3
Background.....	3
Purpose.....	5
Scope and Methodology	6

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Procurement and Contracting Activities.....	7
Policies and Procedures	7
Disabled Veteran Business Enterprise Reporting.....	8
State Agency Buy Recycled Campaign	9
Motor Vehicle Inspections and Use.....	9
Inspection Program	9
Vehicle Use Controls	10
Lease Administration.....	11

APPENDICES

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

ABBREVIATIONS

AB	Assembly Bill
CO	Office of the Chancellor
CSU	California State University
CSULB	California State University, Long Beach
DVBE	Disabled Veteran Business Enterprise
EC	Education Code
EO	Executive Order
GC	Government Code
ICSUAM	Integrated California State University Administrative Manual
PMCP	Policy Manual for Contracting and Procurement
SB	Senate Bill

EXECUTIVE SUMMARY

The Board of Trustees, at its January 2011 meeting, directed that Delegations of Authority be reviewed. The Office of the University Auditor had previously reviewed Delegations of Authority in 2006.

We visited the California State University, Long Beach campus from January 24, 2011, through February 17, 2011, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on delegated activities related to procurement and contracting, motor vehicle inspections, and personal property transactions. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls for delegated activities in effect as of February 17, 2011, taken as a whole, were sufficient to meet the objectives stated in the "Purpose" section of this report.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

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

PROCUREMENT AND CONTRACTING ACTIVITIES [7]

The campus procurement operations manual did not reflect current policies and practices for formal bidding dollar thresholds. In addition, the campus did not have documented procedures for the collection and reporting of Disabled Veteran Business Enterprise participation amounts to ensure that the total dollar value of contracts reported was accurate. Also, required contractor certifications were not consistently obtained for the recycled content of materials and goods, a repeat finding from the prior Delegations of Authority audit.

MOTOR VEHICLE INSPECTIONS AND USE [9]

The campus did not always inspect campus passenger vehicles within the time frame required by the campus motor vehicle inspection program. This is a repeat finding from the prior Delegations of Authority audit. In addition, the campus did not require departments with custody of university-owned vehicles to develop and implement a documented method to control and monitor the use of the vehicles.

LEASE ADMINISTRATION [11]

Campus administration of lease agreements needed improvement. For example, the campus did not have a formal delegation of authority in place to address the execution of lease agreements.

INTRODUCTION

BACKGROUND

In 1986, Senate Bill (SB) 1828 indefinitely extended California State University (CSU) delegations of authority concerning certain procurement and contracting activities, motor vehicle inspections, and real and personal property transactions. The bill's intent was to promote greater economy and efficiency in CSU operations and was expanded by Assembly Bill (AB) 1191 in 1993. SB 1828 also added section 89045(d) to the Education Code (EC):

(d) In addition, the internal audit staff shall perform audits, at least once every five years, of the activities of the CSU pursuant to Sections 89031.5, 89036, 89046, and 89048 of the EC and Section 11007.7 of the Government Code (GC).

EC §89031.5 requires the inspection of all motor vehicles owned by the CSU. Executive Order (EO) 691, *Motor Vehicle Inspections*, dated November 23, 1998, directs each campus to implement a motor vehicle inspection program, specifies eight guidelines that should be included, directs the president to assign the function to an individual, and requires the campuses to notify the Office of the Chancellor (CO) of the individual assigned to the function. CSU policy concerning the use of motor vehicles is codified in *CSU Use of University and Private Vehicles Policy Guidelines*, dated March 2002, issued via Technical Letter 2002-16 from the CO Human Resources department.

EC §89036 grants the CSU authority over certain procurement and contracting activities. EO 775, *Acquisition of Personal Property and Services*, dated June 6, 2001, updates and supersedes prior EOs dating back to 1994 and delegates the procurement authority granted to the CSU under AB 1191 to campus presidents, within the provisions of the *CSU Policy Manual for Contracting and Procurement* (PMCP). EO 760, *Procurement Cards*, dated October 16, 2000, delegates authority for the use of procurement cards to campus presidents.

PMCP, last updated on April 28, 2008, was recently codified in the *Integrated California State University Administrative Manual* (ICSUAM), Section 5000, *Contracts and Procurement*. The ICSUAM establishes systemwide contracting and procurement policy and provides guidance on general procurement practices, along with specific requirements relating to the procurement of goods, services, and information technology resources. Any future updates to contracting policy will be incorporated into the ICSUAM.

EC §89046 granted the CSU the authority to lease state university property for purposes consistent with the functions of the CSU. EO 669, *Leases*, dated May 1, 1997, supersedes an EO issued in 1983. It delegates to campus presidents the authority to execute leases of real property as either lessor or lessee without approval by the CO, subject to certain limitations. The EO requires the use of standard provisions from model lease agreements, an assessment of liability risk for each lease agreement, a competitive process for leasing state university property to for-profit enterprises, an accounting of leases in the campus financial records, and maintenance of a central repository for all current lease agreements.

EC §89048 addresses a number of areas, including certain real property transactions and the sale or exchange of personal property. State University Administrative Manual §9018, *Acquisition and*

Granting of Easements and Acceptance of Quitclaims, sets forth processing guidelines and responsibilities for such real property transactions by the campuses and by the land records staff in the CO Capital Planning, Design and Construction department.

EO 409, *Purchase, Sale, Lease, and License of Personal Property*, dated January 5, 1983, delegates to campus presidents the authority to sell or exchange personal property and has been superseded except for Item B, which permits the sale or exchange of personal property when the campus president determines that it is in the best interest of the CSU and the transaction is based on fair market value.

GC §11007.7 addresses the procurement of insurance or official bonds. However, this section is not applicable to insurance procured by the CSU. CSU policy for insurance is codified by EO 849, *CSU Insurance Requirements*, dated February 5, 2003. It sets forth minimum insurance limits and holds harmless provisions for agreements, contracts, and purchases.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of delegated activities related to procurement and contracting, motor vehicle inspections, and real and personal property transactions and to determine the adequacy of controls over 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 procurement activities incorporates effective internal controls, adequate local policies and operational procedures, current written delegations, and observance of good business practices in compliance with CSU policy.
- ▶ CSU competitive bidding requirements are adhered to in the procurement of goods and services, and CO approval is received prior to the purchase of restricted items.
- ▶ The responsibility for the execution of low-value purchases is properly delegated and methods for such execution are adequately controlled, and campus use of procurement cards is appropriate.
- ▶ Efforts are made to meet Small Business, Disabled Veteran Business Enterprise (DVBE), and Buy Recycled goals; purchasing preferences are properly granted; and Small Business, DVBE, and Buy Recycled reporting is timely, accurate, and supportable.
- ▶ Purchase agreements are properly executed and include required conditions, provisions, certifications, and insurance requirements, and Department of Fair Employment and Housing contract notification requirements are met.
- ▶ The campus motor vehicle inspection program and the use of CSU-owned vehicles comply with CSU policies, and a vehicle inspector has been designated.
- ▶ Leasing activities are adequately controlled and comply with CSU policy and state regulations, and leases are properly executed.
- ▶ Easements, rights-of-way, and quitclaims have been correctly acquired, and the sale or exchange of personal property complies with CSU policy and the EC.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Action Item, Agenda Item 2 of the January 25 and 26, 2011, meeting of the Committee on Audit stated that a review of Delegations of Authority would include, but was not limited to, a review of certain purchasing and contracting activities; motor vehicle inspections and use; agreements and leases; easements, rights-of-way, and quitclaim transactions; and the sale and exchange of personal property. Delegations of Authority is a mandated audit and is required by the EC at least once every five years.

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 focused on procedures in effect from July 1, 2009, through December 31, 2010.

We focused primarily upon the internal administrative, compliance, and operational controls over delegation of authority and contracting activities, motor vehicle inspection, and real and personal property transactions. Specifically, we reviewed and tested:

- ▶ Specific purchasing and contracting activities, delegations, and limitations.
- ▶ Bidding procedures and exceptions.
- ▶ Low-value purchase methods and controls.
- ▶ Granting of purchase preferences.
- ▶ Preparation of Small Business, DVBE, and Buy Recycled reports and goal attainment.
- ▶ Execution of lease agreements.
- ▶ Motor vehicle inspection and use policies and controls.
- ▶ Easements, rights-of-way, and quitclaims and the sale or exchange of personal property.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PROCUREMENT AND CONTRACTING ACTIVITIES

POLICIES AND PROCEDURES

The campus procurement operations manual did not reflect current policies and practices for formal bidding dollar thresholds.

We found that the operations manual required formal bidding for commodity goods starting at \$10,000, while current policies and practices had a threshold of \$50,000.

California State University, Long Beach (CSULB) *Purchasing Operations Manual*, dated April 30, 2008, states that competition is not required for commodities on informal (non-bid) acquisitions of an amount less than \$10,000, unless the campus determines that competition is necessary to develop sources, validate prices, or for other sound business reasons. Except in cases where it has been determined that there is but one source which can properly meet the needs of the campus, all purchases of \$10,000 or more must be formally bid and awarded to the lowest responsible bidder meeting specifications.

CSULB *General Purchasing Information*, dated December 2004, states that formal price quotations/proposals must be obtained on all purchases for goods and services where the dollar amount exceeds \$50,000. Informal price quotations are obtained for goods between \$1,000 and \$50,000 unless reasonableness of price can be determined without competition.

State Administrative Manual §20050 states that one symptom of a deficient internal control system is policy and procedural or operational manuals that are either not currently maintained or are nonexistent.

The director of purchasing and financial services stated that the CSULB Purchasing Operations Manual supersedes the older General Purchasing Information and that they are in the process of reviewing manuals to ensure consistency.

Failure to ensure consistency among policies addressing formal bidding dollar thresholds increases the risk of inappropriate and inconsistent purchase order processing.

Recommendation 1

We recommend that the campus update the procurement operations manual so that it reflects current policies and practices for formal bidding dollar thresholds.

Campus Response

We concur. We will review and update the CSULB Operations Manual and respective guidelines to ensure formal bid thresholds are stated consistently. Estimated completion date is November 1, 2011.

DISABLED VETERAN BUSINESS ENTERPRISE REPORTING

The campus did not have documented procedures for the collection and reporting of Disabled Veteran Business Enterprise (DVBE) participation amounts to ensure that the total dollar value of contracts reported was accurate.

We reviewed the fiscal year 2009/10 DVBE contracting activity report and found that DVBE purchases were overstated by \$295,185 due to the inclusion of a small business vendor that should not have been classified as a DVBE.

Integrated California State University Administrative Manual §5215.0, *DVBE Participation Goals*, states in part that DVBE activity reports shall be prepared and submitted by each campus to the department of General Services. A copy of activity reports shall be sent to the chancellor's office, department of Contract Services and Procurement, in order to consolidate activity for the CSU system.

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 director of purchasing and financial services stated that the amount had inadvertently been posted to the wrong column and the mistake was not detected due to management oversight.

The lack of documented procedures addressing the collection and reporting of DVBE participation amounts increases the risk that the report will contain inaccurate information and the possibility of noncompliance with state and California State University (CSU) DVBE requirements.

Recommendation 2

We recommend that the campus develop and implement procedures for the collection and reporting of DVBE participation amounts to ensure that the total dollar amount of contracts reported is accurate.

Campus Response

We concur. We will develop and implement procedures for collection and reporting of DVBE participation amounts to ensure the total dollar amount of contracts is accurately reported. Estimated completion date is November 1, 2011.

STATE AGENCY BUY RECYCLED CAMPAIGN

Required contractor certifications were not consistently obtained for the recycled content of materials and goods. This is a repeat finding from the prior Delegations of Authority audit.

Public Contract Code §12205 states that contractors shall be required to certify in writing the minimum percentage, if not the exact percentage, of post consumer and secondary material in the materials, goods, or supplies provided or used. This certification shall be furnished under penalty of perjury.

The director of purchasing and financial services stated that failure to obtain all certifications was due to management oversight.

Failure to consistently obtain contractor certifications for the recycled content of purchases of materials and goods increases the risk of noncompliance with state regulations and inaccurate recycled content reporting.

Recommendation 3

We recommend that the campus obtain required contractor certifications for the recycled content of purchases of materials and goods.

Campus Response

We concur. We will develop and implement procedures to obtain contractor certifications for the recycled content of applicable purchases as required by the Buy Recycled handbook. Estimated completion date is November 1, 2011.

MOTOR VEHICLE INSPECTIONS AND USE

INSPECTION PROGRAM

The campus did not always inspect campus passenger vehicles within the time frame required by the campus motor vehicle inspection program. This is a repeat finding from the prior Delegations of Authority audit.

We reviewed 14 passenger vehicles and found two instances in which the time between inspections was 10 months and 30 months, rather than the required six months.

The CSULB *Motor Vehicle Inspection Program*, revised January 2003, states that in order to guarantee the maximum useful life of state-owned vehicles, a maintenance service is required every 4,000 miles or six months, whichever comes first, and also at 12,000 miles or annually, whichever comes first.

The superintendent of building trades, facilities management stated that the campus auto shop's heavy workload, in addition to faculty and staff turnover that made it difficult to reach certain department contacts, made it difficult to inspect all passenger vehicles within the required time frame.

Failure to ensure that campus vehicles are inspected within the required time frame increases the risk of poorly maintained motor vehicles and negatively impacts driver safety.

Recommendation 4

We recommend that the campus enforce inspection of all campus passenger vehicles within the time frame required by the campus motor vehicle inspection program.

Campus Response

We concur. The campus will send out a notification to campus passenger vehicle user departments reminding them of the campus motor vehicle inspection policy and procedures. This notification will be addressed to department heads, and not only vehicle coordinators, to ensure policy compliance. If the vehicle users do not comply with the scheduled maintenance and inspection requirements, campus fleet services will notify department heads for compliance. Estimated completion date is June 30, 2011.

VEHICLE USE CONTROLS

The campus did not require departments with custody of university-owned vehicles to develop and implement a documented method to control and monitor the use of the vehicles.

CSU Use of University and Private Vehicles Policy Guidelines, dated March 2002, state that university vehicles shall only be used in the conduct of university business and that the campus must establish one point of control to control usage in accordance with federal, State of California, CSU, and campus laws, regulations, policies, and procedures.

The superintendent of building trades, facilities management stated that once the requisitioned vehicle was received and assigned to the department, the department head was responsible for the vehicle and its use.

Failure to properly control the use of university-owned vehicles increases the risk of exposure to unforeseen liability risks, unqualified drivers, and noncompliance with state, campus, and CSU policy.

Recommendation 5

We recommend that the campus require departments with custody of university-owned vehicles to develop and implement a documented method to control and monitor the use of the vehicles.

Campus Response

We concur. The campus will formally document the authorized users for university-owned vehicles assigned to primary users within the facilities management and parking department. For all other university-owned vehicles, the campus will require usage logs for the monitoring of the use of each university-owned vehicle. Estimated completion date is June 30, 2011.

LEASE ADMINISTRATION

Campus administration of lease agreements needed improvement.

We found that:

- ▶ The campus did not have a formal delegation of authority in place to address the execution of lease agreements.
- ▶ The campus had not obtained approval from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities. Additionally, fees for 4 of the 15 facility-use agreements we reviewed did not agree with the current facility rate schedule.
- ▶ Of the 15 short-term leases of campus facilities we reviewed, two were not executed properly. One lease was not signed by a campus representative, and the other was signed subsequent to the start of the lease period.

Executive Order (EO) 669, *Leases*, dated April 21, 1997, delegates the authority to execute leases of real property as either lessor or lessee to the campus president or designee without approval by the CO, subject to exceptions.

Standing Orders of the CSU Board of Trustees (BOT) §II.i and §VI.f state that the chancellor has the authority to establish and oversee campus fees; establish, adjust, and oversee systemwide fees subject to overall direction of the BOT; and the campus president is authorized to oversee and adjust campus fees. Presidents may delegate their authority to other officials on their campuses.

The director of purchasing and financial services stated that the campus procurement delegation pursuant to EO 775 had been intended to apply to all contracts, including leases and facility-rental rates. She further stated that the lease agreement had been signed by a campus representative and given to the lessee, but the campus had not maintained a signed copy on file and was in the process of obtaining a signed copy from the lessee. Additionally, she stated that the lease was signed after the start of the lease term due to management oversight.

Failure to properly delegate lease administration responsibilities increases the risk of inappropriate and inconsistent processing of lease contracts and administration, and inadequate controls over the leasing of state facilities increases the risk of invalid or incomplete facility-use agreements and the risk of inappropriate rentals, unapproved rental fees, and lost fee revenue.

Recommendation 6

We recommend that the campus:

- a. Identify the individual(s) responsible for executing lease agreements and delegate authority to these individual(s) in accordance with EO 669.
- b. Obtain approval from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities, and ensure fees are charged in accordance with this schedule.
- c. Ensure that lease agreements are properly executed.

Campus Response

We concur.

- a. We have identified individuals responsible for executing lease agreements and facility use agreements and have created delegations of authority. Estimated completion date is June 30, 2011.
- b. We are compiling the current facility rate schedule of fees charged for the use of state facilities and will obtain approval from the president or designee. We will ensure fees are charged in accordance with this schedule. Estimated completion date is October 15, 2011.
- c. We will ensure that lease agreements are properly executed by adhering to the delegations of authority created in Recommendation 6a. and ensuring that leases are fully executed. Estimated completion date is June 30, 2011.

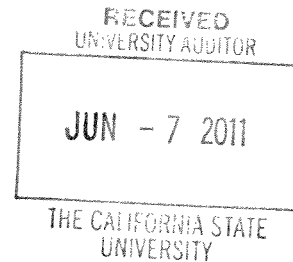
APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
F. King Alexander	President
Susan Brown	Director, Physical Planning and Construction Management
Ellie Christov	Director, Support Services
Laurinda Fuller	Director, Purchasing and Financial Services
Lawrence Klumas	Director, Facilities Operations
Paul Johnson	Superintendent of Building Trades, Facilities Management
Mishelle Laws	Associate Vice President, Administrative Services
Gregory Pascal	Communication Supervisor, University Police
David Salazar	Associate Vice President, Physical Planning and Facilities Management
Fernando Solorzano	Field Services Division Captain
Aysu Spruill	Director of Internal Auditing/Information Security Officer
Mary Stephens	Vice President, Administration and Finance
Sharon Taylor	Associate Vice President, Financial Management



CALIFORNIA STATE UNIVERSITY, LONG BEACH

DIVISION OF ADMINISTRATION AND FINANCE



May 31, 2011

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

Re: Response to Delegations of Authority Audit #11-21

Dear Larry:

Please find enclosed California State University, Long Beach's response to the above report. The campus is committed to addressing and resolving the issues identified in the audit report.

Please let me know if we can provide you with any additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Stephens".

Mary Stephens
Vice President for Administration and Finance

Enclosure

IA-0277

- c: F. King Alexander, President
Ted Kadowaki, Associate Vice President, Budget and University Services
David Salazar, Associate Vice President, PPFM
Aysu Spruill, Director, Internal Auditing Services/Information Security Officer
Sharon Taylor, Associate Vice President, Financial Management

**DELEGATIONS OF AUTHORITY
CALIFORNIA STATE UNIVERSITY,
LONG BEACH**

Audit Report 11-21

PROCUREMENT AND CONTRACTING ACTIVITIES

POLICIES AND PROCEDURES

Recommendation 1

We recommend that the campus update the procurement operations manual so that it reflects current policies and practices for formal bidding dollar thresholds.

Campus Response

We concur. We will review and update the CSULB Operations Manual and respective guidelines to ensure formal bid thresholds are stated consistently. Estimated completion date is November 1, 2011.

DISABLED VETERAN BUSINESS ENTERPRISE REPORTING

Recommendation 2

We recommend that the campus develop and implement procedures for the collection and reporting of DVBE participation amounts to ensure that the total dollar amount of contracts reported is accurate.

Campus Response

We concur. We will develop and implement procedures for collection and reporting of DVBE participation amounts to ensure total dollar amount of contracts is accurately reported. Estimated completion date is November 1, 2011.

STATE AGENCY BUY RECYCLED CAMPAIGN

Recommendation 3

We recommend that the campus obtain required contractor certifications for the recycled content of purchases of materials and goods.

Campus Response

We concur. We will develop and implement procedures to obtain contractor certifications for the recycled content of applicable purchases as required by the Buy Recycled handbook. Estimated completion date is November 1, 2011.

MOTOR VEHICLE INSPECTIONS AND USE**INSPECTION PROGRAM****Recommendation 4**

We recommend that the campus enforce inspection of all campus passenger vehicles within the time frame required by the campus motor vehicle inspection program.

Campus Response

We concur. The campus will send out a notification to campus passenger vehicle user departments reminding them of the campus motor vehicle inspection policy and procedures. This notification will be addressed to department heads and not only vehicle coordinators to ensure policy compliance. If the vehicle users do not comply with the scheduled maintenance and inspection requirements, campus fleet services will notify department heads for compliance. Estimated completion date is June 30, 2011.

VEHICLE USE CONTROLS**Recommendation 5**

We recommend that the campus require departments with custody of university-owned vehicles to develop and implement a documented method to control and monitor the use of the vehicles.

Campus Response

We concur. The campus will formally document the authorized users for university-owned vehicles assigned to primary users within the Facilities Management and Parking department. For all other university-owned vehicles, the campus will require usage logs for the monitoring of the use of each university-owned vehicle. Estimated completion date is June 30, 2011.

LEASE ADMINISTRATION**Recommendation 6**

We recommend that the campus:

- a. Identify the individual(s) responsible for executing lease agreements and delegate authority to these individual(s) in accordance with EO 669.

- b. Obtain approval from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities, and ensure fees are charged in accordance with this schedule.
- c. Ensure that lease agreements are properly executed.

Campus Response

We concur.

- a. We have identified individuals responsible for executing lease agreements and facility use agreements and have created delegations of authority. Estimated completion date is June 30, 2011.
- b. We are compiling the current facility rate schedule of fees charged for the use of state facilities and will obtain approval from the president or designee. We will ensure fees are charged in accordance with this schedule. Estimated completion date is October 15, 2011.
- c. We will ensure that lease agreements are properly executed by adhering to the delegations of authority created in recommendation 6a. and ensuring that leases are fully executed. Estimated completion date is June 30, 2011.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

June 27, 2011

CHICO

DOMINGUEZ HILLS

MEMORANDUM

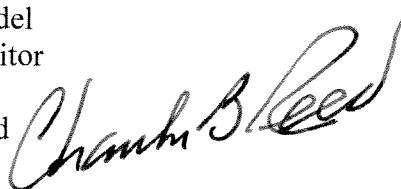
EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

SUBJECT: Draft Final Report 11-21 on *Delegations of Authority*,
California State University, Long Beach

LONG BEACH

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of June 27, 2011, I accept the response as submitted with the draft final report on *Delegations of Authority*, California State University, Long Beach.

MONTREY BAY

NORTHRIDGE

POMONA

CBR/amd

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS