

Audit and Advisory Services
401 Golden Shore
Long Beach, CA 90802-4210

August 26, 2022

Dr. Tomás D. Morales, President
California State University, San Bernardino
5500 University Parkway
San Bernardino, CA 92407

Dear Dr. Morales:

**Subject: Audit Report 21-39, Human Resources Management,
California State University, San Bernardino**

We have completed an audit of *Human Resources Management* as part of our 2021-2022 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

I have reviewed the management response and have concluded that it appropriately addresses our recommendations. The management response has been incorporated into the final audit report, which will be posted to Audit and Advisory Services' website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,



Vlad Marinescu
Vice Chancellor and Chief Audit Officer

c: Jolene Koester, Interim Chancellor
Lateefah Simon, Chair, Committee on Audit
Yammilette Rodriguez, Vice Chair, Committee on Audit

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HUMAN RESOURCES MANAGEMENT

**California State University,
San Bernardino**

Audit Report 21-39
August 26, 2022

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls related to human resources management (HRM) and to ensure compliance with relevant federal and state regulations; Trustee policy; Office of the Chancellor (CO) directives; collective bargaining agreements, and campus procedures.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, the operational and administrative controls for HRM as of June 13, 2022, were unlikely to provide reasonable assurance that risks were being managed and objectives were met.

Overall, we found that the campus was not effectively administering many of the key human resources (HR) processes. The HR division transitioned from an HR generalist model to an HR specialist model effective February 2020 and experienced continuous turnover in the years we reviewed, which may have contributed to the issues noted. Many HR processes needed significant improvement, including administration of the family medical leave (FML) program, independent contractor process, and conflict-of-interest reporting.

We also found that several operational and administrative controls needed to be strengthened, including processes for recruiting, selecting, and hiring new employees; completion of required training; processes for termination, resignation, and retirement of employees; and administration of employee performance evaluations. Also, we noted issues in license and certification requirements, new-hire documents, outside-employment disclosures, relocation expenses, confidentiality agreements, and communication of campus policies and federal and state laws and regulations in the employment area.

The campus was aware that HR was an area that needed improved oversight and had recently elevated HR leadership to a cabinet position by creating a new vice president (VP) of HR in April 2022. At the time of our review, there was an interim VP in this role.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. FAMILY MEDICAL LEAVE

OBSERVATION

Administration of FML needed significant improvement.

We found that the process for tracking FML, including employee return dates and timely submission of medical certifications, needed improvement. Specifically, the spreadsheet used to track employees on FML included inaccurate information, was missing information such as the last day worked, and was not always updated with information such as the actual return date. In addition, the campus did not monitor medical certifications. We also found that the campus did not have a process to ensure that employees properly reported their attendance while on FML.

Further, we found that the FML request form did not reflect current campus practice as it included a section for administrator and timekeeper approval that was not being used and was not required.

We reviewed 10 FML requests, and we found that:

- In two instances, medical certifications to support the need for the leave were not provided.
- In three instances, employee attendance records did not agree with the approved FML dates and hours.
- In three instances, the campus did not complete and distribute to employees required FML notices.
- In one instance, the employee did not exhaust their accumulated sick and vacation leave prior to taking unpaid leave.
- In one instance, the employee did not complete a FML request form.

Proper administration of FML, including maintaining complete and accurate records to support employer notification of rights and responsibilities, the need for the leave, and proper use of sick leave and/or vacation credits, can help to ensure compliance with state and federal regulations, systemwide policy, and collective bargaining agreements.

RECOMMENDATION

We recommend that the campus:

- a. Develop and implement written procedures for the administration of and compliance with requirements for FML and to address the issues noted above, including maintaining

complete and accurate records to monitor and support FML and monitoring sick leave and/or vacation credit usage.

- b. Update the FML request form to reflect current campus practices.
- c. Provide training on the new procedures to relevant personnel.

MANAGEMENT RESPONSE

We concur. The campus will develop and implement written procedures for the administration of and compliance with requirements for FML. We will update the FML request form and provide training on the new procedures to relevant personnel.

Implementation date: February 28, 2023

2. INDEPENDENT CONTRACTORS

OBSERVATION

Administration of independent contractors needed improvement.

We reviewed 14 independent contractors, and we found that:

- Six independent contractors performed services before being approved by HR.
- There was no documentation showing that a background check had been performed for five independent contractors. Per technical letter HR/Salary 2021-07, proof of background check is required before a contractor can begin to provide services. In one additional instance, an independent contractor went through a background check after services commenced.
- In five instances, the campus did not satisfy the requirements under the Dynamex Test, as required by systemwide HR policy, to establish that the worker should be classified as an independent contractor.
- In two instances, there was no evidence showing that the campus notified the union prior to contracting work to an external vendor on a long-term basis.

Correct classification of workers as employees or independent contractors reduces the risk of wage liability, including overtime; benefit liability, including retirement; loss of reimbursement under federal contract and grant funds; penalties for violation of state and federal tax withholding laws; and violation of employment-related requirements.

RECOMMENDATION

We recommend that the campus:

- a. Remind key personnel of campus independent contractor procedures, including obtaining required HR approval and reviewing the Dynamex Test before engaging with independent contractors.
- b. Update current procedures to include a process for completing timely background checks and identifying when unions should be notified of long-term contracts with third parties, and communicate the procedures to key campus personnel.
- c. Seek guidance from systemwide HR as necessary before engaging with independent contractors.

MANAGEMENT RESPONSE

We concur. The campus will remind key personnel of campus independent contractor procedures, including obtaining required HR approval and reviewing the Dynamex Test before engaging with independent contractors. We will update current procedures to include a process for completing timely background checks and identifying when unions should be notified of long-term contracts with third parties, and communicate the procedures to key personnel. In addition, we will seek guidance from systemwide HR as necessary before engaging with independent contractors.

Implementation date: February 28, 2023

3. CONFLICT OF INTEREST

OBSERVATION

Conflict-of-interest (COI) administration needed improvement.

We found that the campus did not have written COI procedures. In addition, we found that the campus did not review COI statements for completion, ensure that COI statements were filed when individuals in designated positions were hired, or review the designated position list to determine whether new or existing positions on campus required incorporation.

We reviewed COI disclosure statements for 10 employees in designated positions, including five new hires and five current employees, and we found that:

- The five new hires did not complete and sign the COI statement.
- One current employee did not complete and sign the annual 2021 COI statement.

We also found that the campus did not have a process to monitor and ensure compliance with COI training requirements. We reviewed training records for 30 new hires, including 16 employees in positions that, based on title and job duties, should have been designated positions, and we found that:

- None of the 16 employees completed COI training, because it was not assigned.

- In 13 of these instances, the position was not included on the campus list of designated positions.

Adequate administration of COI disclosures and training decreases the risk of noncompliance with governmental requirements and possible regulatory scrutiny.

RECOMMENDATION

We recommend that the campus:

- a. Develop and implement comprehensive COI procedures to address the issues noted above, including appropriately identifying employees in designated positions, timely completion of COI disclosure forms, and proper assignment and monitoring of COI training.
- b. Communicate the procedures to appropriate campus personnel.
- c. Update the campus list of designated positions as necessary.

MANAGEMENT RESPONSE

We concur. The campus will develop and implement comprehensive COI procedures to address the issues noted above, including appropriately identifying employees in designated positions, timely completion of COI disclosure forms, and proper assignment and monitoring of COI training. We will communicate the procedures to appropriate campus personnel and update the campus list of designated positions as necessary.

Implementation date: February 28, 2023

4. RECRUITING, SELECTION AND HIRING ACTIVITIES

OBSERVATION

Administration of recruiting, selection, and hiring activities needed improvement.

We reviewed 30 new hires, including 28 staff/management personnel plan (MPP) employees and two student employees, and we found that:

- In 28 instances, the candidate rank was not documented.
- In 27 instances, the applicant interview questions were not documented.
- In 25 instances, the campus did not obtain required applicant information regarding relatives working for the same campus.
- In two instances, the employee did not complete all required testing before the campus made a conditional offer of employment.

- In two instances, the campus did not maintain documentation to support that the job recruitment requisition was approved.
- In two instances, student employees were notified orally about the job offer but did not receive a written notification with time base, initial salary, and effective date of appointment.

Effective administration of recruiting, selection, and hiring activities enhances transparency and provides greater assurance of a pool of qualified individuals.

RECOMMENDATION

We recommend that the campus update current procedures to address the issues noted above, communicate these procedures to appropriate campus personnel, and provide training on the updated procedures.

MANAGEMENT RESPONSE

We concur. The campus will update current procedures to address the issues noted above, communicate these procedures to appropriate campus personnel, and provide training on the updated procedures.

Implementation date: February 28, 2023

5. SEPARATIONS

OBSERVATION

Campus processes for terminations, resignations, and retirement of employees needed improvement to ensure that access to systems was removed and any other required administrative steps were taken.

We reviewed 30 voluntary separations and 13 involuntary separations (terminations), and we found that:

- In 25 instances, clearance forms were not completed.
- In 13 instances, Information Technology Services (ITS) was not notified to remove PeopleSoft system access at the time of termination or separation. In one of these instances, PeopleSoft system access was removed 248 days after the employee was terminated.
- In nine instances, clearance forms were completed late, between nine and 43 days after the separation date.
- In seven instances, the employee was removed from the payroll system late, between six and 57 days after the separation date.

- In two terminations, required discharge notifications were not completed.

In addition, through general inquiries with facilities management and a review of facilities management records, we found that one former HR employee did not return the HR master key at the time of separation, and three former HR employees did not return their keys at the time of separation.

Effective processes to ensure completion of all required steps for the termination and separation of employees, including removal of system access and other administrative steps, provides greater assurance that information assets are protected and other financial and administrative records are accurate.

RECOMMENDATION

We recommend that the campus:

- a. Update current separation procedures to ensure that all required system access and administrative requirements are addressed, and communicate these procedures to key campus personnel.
- b. Review key access to HR facilities and determine whether to re-key doors.

MANAGEMENT RESPONSE

We concur. The campus will update current separation procedures to ensure that all required system access and administrative requirements are addressed, and communicate these procedures to key campus personnel. We will also review key access to HR facilities and determine whether to re-key doors.

Implementation date: February 28, 2023

6. LICENSE, CERTIFICATION, AND REGISTRATION REQUIREMENTS

OBSERVATION

The campus did not comply with California State University (CSU) policy on license and certification requirements.

We found that the campus did not perform the following responsibilities required by HR 2005-24, *CSU Employment: License, Certification and Registration Requirements*:

- Researching and complying with current and new special license, certification, and/or registration requirements for all positions or verifying that position descriptions referenced special license, certification, and/or registration requirements when necessary for the position. HR instead relied on information provided by the hiring department.

- Monitoring all positions that require any special license, certificates, and/or registration requirements and ensuring incumbents possess the appropriate related qualifications. The campus only monitored the following for positions listed on the CSU Professional License Table: California Driver’s License; Commercial Applicator Certificate (of Pesticides); and License to practice medicine in California, board certification.
- Developing and implementing campus procedures for the verification and reverification of any special license, certification, and /or registration requirements.

We reviewed 30 new hires, including 10 who required at least one special license or certification, and we found that in seven instances, the campus did not provide a copy of all the required licenses/certifications.

Documented procedures for the verification and reverification of special license, certification, and/or registration requirements helps to ensure compliance with CSU policies.

RECOMMENDATION

We recommend that the campus:

- a. Develop and implement written procedures to comply with HR 2005-24 requirements as noted above.
- b. Follow up with the hiring departments to ensure that required licenses/certifications were obtained from the seven individuals noted above.

MANAGEMENT RESPONSE

We concur. The campus will develop and implement written procedures to comply with HR 2005-24 requirements as noted above. We will also follow up with the hiring departments to ensure that required licenses/certifications were obtained from the seven individuals noted above.

Implementation date: February 28, 2023

7. EMPLOYEE PERSONNEL FILES

OBSERVATION

Required new hire documents were not consistently obtained and verified.

We reviewed personnel files and new-hire documents for 30 employees hired since July 1, 2020, and we found that:

- 19 position descriptions did not include all the elements noted in HR 2012-15, *Position Description Policy*.

- The I-9 Employment Eligibility Verification form was not timely collected and/or verified for seven employees. In another instance, the current I-9 Employment Eligibility Verification form was not used.
- Five position descriptions were signed by the employee and supervisor after the effective hire date.
- For three individuals, personnel files could not be located, and for four other individuals, required new-hire documents could not be located or were completed late.

Completion and verification of required hiring documentation provides assurance that all new hires meet technical and compliance qualifications and alleviates misunderstandings regarding employment conditions.

RECOMMENDATION

We recommend that the campus develop and implement procedures for completing and verifying new-hire documents to address the issues noted above, and communicate these procedures to appropriate campus personnel.

MANAGEMENT RESPONSE

We concur. The campus will develop and implement procedures for completing and verifying new-hire documents to address the issues noted above and communicate these procedures to appropriate campus personnel.

Implementation date: February 28, 2023

8. EMPLOYEE TRAINING

OBSERVATION

New hires did not always complete required training.

We reviewed training records for 30 new hires, and we found that:

- Two employees were assigned Data Security training but did not complete it within 30 days of hire. The employees had been working 65 and 114 days.
- One employee was assigned Gender Equity and Title IX training but did not complete it within six months of hire and had been working for more than one year.

Adequate monitoring and timely completion of required training can help to ensure compliance with CSU and campus policies.

RECOMMENDATION

We recommend that the campus strengthen the process for tracking and monitoring employees with overdue or incomplete training, including addressing escalation procedures for noncompliance.

MANAGEMENT RESPONSE

We concur. Our campus will strengthen the process for tracking and monitoring employees with overdue or incomplete training, including addressing escalation procedures for noncompliance.

Implementation date: February 28, 2023

9. EMPLOYEE PERFORMANCE EVALUATIONS

OBSERVATION

Administration of employee performance evaluations needed improvement.

We found that the campus did not have a process to monitor employee performance evaluations to ensure that they were completed accurately and timely in accordance with respective collective bargaining agreements (CBA).

We reviewed employee performance evaluations for 30 employees, and we found that:

- Performance evaluations had not been completed during the audit period for eight employees. For two additional employees, at least one evaluation required during the audit period was not performed.
- Performance evaluations were not completed timely for seven employees, between 47 and 121 days after the due date.
- Four performance evaluations were not signed by the employee and/or supervisor.

We also found that the campus did not have a written merit evaluation plan for management personnel and did not perform periodic monitoring to ensure that current and documented performance evaluations were on file for management personnel who were awarded raises.

Documented performance evaluations and a written merit evaluation plan help to ensure compliance with CSU policies and applicable CBAs.

RECOMMENDATION

We recommend that the campus:

- a. Update current procedures to address proper and timely performance of employee performance evaluations, and communicate these procedures to key campus personnel.
- b. Create, implement, and adhere to a written merit evaluation plan for management personnel.

MANAGEMENT RESPONSE

We concur. The campus will update current procedures to address proper and timely performance of employee performance evaluations and communicate these procedures to key campus personnel. We will also create, implement, and adhere to a written merit evaluation plan for management personnel.

Implementation date: February 28, 2023

10. OUTSIDE EMPLOYMENT DISCLOSURE

OBSERVATION

The process for ensuring that MPP employees completed the required Outside Employment Disclosure (OED) form needed improvement.

Per coded memorandum Human Resources 2016-06, *Revised Outside Employment Disclosure Requirements for Management Personnel Plan (MPP) and Executive Employees*, all MPP employees are required to submit an OED form at the time of hire and at least annually.

We reviewed OED forms for 30 employees during the audit period, and we found that:

- Nine MPP employees did not complete the 2020 disclosure form, and 21 MPP employees did not complete the 2021 disclosure form.
- Five 2020 disclosure forms and five 2021 disclosure forms were not fully completed or were completed incorrectly.
- Four 2021 annual disclosure forms were not completed timely.

In addition, the campus did not have a process in place and therefore was unable to verify that employees completed an OED form within 30 days of accepting outside employment positions.

Obtaining completed outside employment disclosures provides greater assurance of transparency and helps to prevent any conflict of commitment.

RECOMMENDATION

We recommend that the campus:

- a. Strengthen procedures to ensure that OED forms are accurately completed by and received from all MPP employees at the time of hire or appointment, annually, and within 30 days of accepting outside employment.
- b. Communicate the updated procedures to relevant campus personnel.

MANAGEMENT RESPONSE

We concur. The campus will strengthen procedures to ensure that OED forms are accurately completed by and received from all MPP employees at the time of hire or appointment, annually, and within 30 days of accepting outside employment. We will communicate the updated procedures to relevant campus personnel.

Implementation date: February 28, 2023

11. EMPLOYEE RELOCATION EXPENSES

OBSERVATION

The process for review and repayment of employee relocation expenses needed improvement.

Per the campus *Relocation Policy*, employees who receive relocation assistance but are not employed for a period of at least two years are required to repay the assistance based on the following schedule:

- 100% if employed less than six months.
- 75% if employed at least six months, but less than 12 months.
- 50% if employed at least 12 months, but less than 18 months.
- 25% if employed at least 18 months, but less than 24 months.

We reviewed relocation expenses for 15 employees, and we found that:

- 10 relocation and moving expenses were not fully supported by itemized receipts and/or were dated before the expenses were authorized on the conditional offer letter.
- Two employees did not repay 50% of the amount received for reimbursement for moving and relocation expenses. The employees were employed at least 12 months but less than 18 months.
- One relocation and moving expense reimbursement to the employee was higher than the amount authorized in the conditional offer letter by \$1,932.

Adequate processing and monitoring for repayment of employee relocation expenses improves accountability and decreases the risk of noncompliance with CSU and campus policies.

RECOMMENDATION

We recommend that the campus:

- a. Evaluate current processes for review of employee relocation expenses and implement improvements to ensure that campus' processes align with systemwide policy.
- b. Update current procedures to include a process to monitor repayment of employee relocation expenses, and communicate these procedures to relevant campus personnel.

MANAGEMENT RESPONSE

We concur. Our campus will evaluate current processes for review of employee relocation expenses and implement improvements to ensure that the campus's processes align with systemwide policy. We will update current procedures to include a process to monitor repayment of employee relocation expenses and communicate these procedures to relevant campus personnel.

Implementation date: February 28, 2023

12. CONFIDENTIALITY AGREEMENTS

OBSERVATION

Confidentiality agreements were not always completed.

The campus requires all employees who have been determined to have a need for access to confidential personal information to complete a Confidentiality Compliance form.

We reviewed confidentiality forms for 18 search committee members and 11 HR employees, and we found that:

- Nine search committee members did not complete the confidentiality form.
- Three HR employees did not complete the confidentiality form.
- Three search committee members and five HR employees completed the confidentiality form late during audit fieldwork. Four of these individuals completed the confidentiality form after the audit document request was submitted.

Completion of confidentiality forms helps to ensure that confidential personal information is properly protected.

RECOMMENDATION

We recommend that the campus enhance procedures to ensure that completed confidentiality forms are received from all employees who have been determined to have a need for access to confidential personal information.

MANAGEMENT RESPONSE

We concur. The campus will enhance procedures to ensure that completed confidentiality forms are received from all employees who have been determined to have a need for access to confidential personal information.

Implementation date: February 28, 2023

13. POLICY COMMUNICATION

OBSERVATION

The campus *Staff Handbook* needed to be updated, and required federal and state posters were not always posted.

We found that the campus *Staff Handbook* was last updated in December 2013, and it included a broken link to the fee waiver website and references to Executive Order (EO) 1089, which has been superseded.

We also found that required federal and state posters were not posted in conspicuous places throughout the campus.

Timely and effective communication of employment policies can help to ensure compliance with systemwide policies and federal and state laws and regulations.

RECOMMENDATION

We recommend that the campus:

- a. Review and update the campus *Staff Handbook*.
- b. Determine where to post required federal and state posters and post them in conspicuous places so that employees can easily read them.

MANAGEMENT RESPONSE

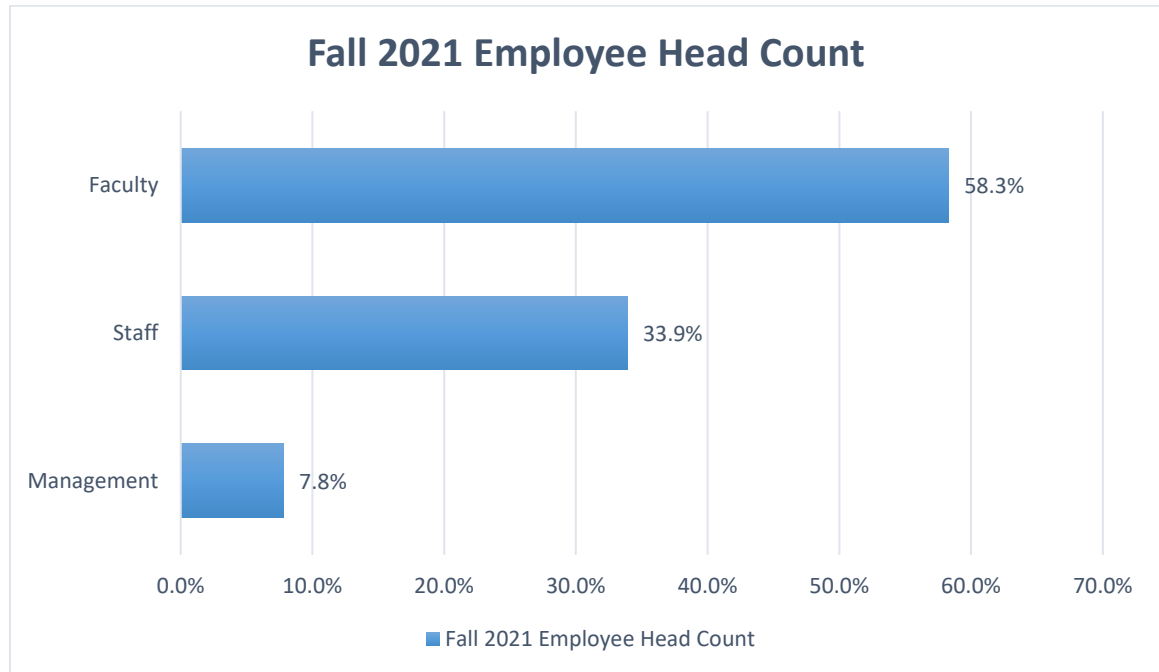
We concur. The campus will review and update the campus *Staff Handbook*. We will determine additional locations to post required federal and state posters and post them in conspicuous places so that employees can easily read them.

Implementation date: February 28, 2023

GENERAL INFORMATION

BACKGROUND

The CSU is home to a diverse student and staff population across its 23 campuses and the CO. The CSU workforce is made up of faculty, staff, and management employees, with total headcount for the system estimated at 57,326 in fall 2021. The majority of staff and faculty employees in the CSU are represented employees, organized into 13 bargaining units and represented by unions.



** Faculty as pictured includes instructional faculty, non-instructional faculty, and student teaching assistants.*

HRM is responsible for supporting and managing the workforce, managing activities such as recruitment and hiring, professional development, compensation and evaluation, and development of retention strategies. At the CSU, faculty affairs departments situated in Academic Affairs typically hold responsibility for faculty-related human resources functions, while the human resources department usually takes on all human resources functions for management and staff.

The Systemwide HR division at the CO supports and collaborates with the CSU’s 23 campuses to cultivate an environment that empowers all, welcomes diverse perspectives, and encourages innovation to promote student success and to establish the CSU as an employer of choice. Systemwide HR provides leadership and guidance in such areas as employment practices, organizational structure, employee engagement, workers compensation, unemployment, leaves of absence, performance management, benefits, compensation, and other employment-related programs and services.

As a state agency and a recipient of federal funds, the CSU must perform its HRM responsibilities within legal constraints imposed by the government. In addition to CSU policies and collective bargaining agreements, the university must comply with major federal and state laws that govern HRM practices and address equity and fairness in the workplace.

At California State University, San Bernardino, the HR division is responsible for the overall HR function and is composed of several units, including benefits; classification and compensation; customer and operational support; diversity, equity, and inclusion; employee and labor relations; institutional equity and compliance; payroll services; the staff development center; and talent acquisition.

SCOPE

We performed fieldwork from April 4, 2022, through May 27, 2022. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. The audit focused primarily on staff and management employees processed by campus human resources and procedures in effect from July 1, 2020, to May 27, 2022.

Specifically, we reviewed and tested:

- Administration and organization of the human resources function, indicating clear lines of responsibility and authority.
- Processes and procedures to ensure timely and effective communication of CSU and campus policies and federal and state laws and regulations in the employment area.
- Controls for ensuring that standards and objectives for each campus position are adequately documented and communicated.
- Processes for recruiting, selecting, and hiring new employees, including eligibility and background check requirements, vacancy announcements, search committee activities, appointment letters, required training, and conflict-of-interest disclosures for designated positions.
- Administration of the independent contractor process, including determining the correct classification of workers as employees or independent contractors in accordance with appropriate federal and state laws and CSU policies.
- Administration of employee compensation, benefits, leave, and other employee programs.
- Processes for termination, resignation, and retirement of employees, including required documentation and notification, and procedures for collecting university property and terminating access to systems.
- Controls for ensuring that all confidential employee information is protected.

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.

Our testing and methodology, which was designed to provide a review of key operational and administrative controls, included interviews, walkthroughs, and detailed testing on certain aspects of the HRM program. Our review was limited to gaining reasonable assurance that essential elements of the HRM program were in place and did not examine all aspects of the program.

CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and guidance; Trustee policy; Office of the Chancellor directives; and campus procedures; as well as sound administrative practices and consideration of the potential impact of significant risks. This audit was conducted in conformance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

This review emphasized, but was not limited to, compliance with:

- California Code of Regulations, Title 5 §42396
- Collective Bargaining Agreements of the CSU
- EO 712, *Delegation of Authority and Procedures for the Administration of Fee Waivers and Reductions for Employee Training and Career Development*
- EO 1088, *Systemwide Guidelines for Affirmative Action Programs in Employment*
- EO 1096, *Interim CSU Policy Prohibiting Discrimination, Harassment, Sexual Misconduct, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking, and Retaliation*
- HR 2004-18, *Revised CSU Nepotism Policy*
- HR 2005-05, *CSU Employment and Conflicts of Interest and Incompatible Activities*
- HR 2005-24, *CSU Employment: License, Certification and Registration Requirements*
- HR 2012-15, *Position Description Policy*
- HR 2015-02, *Revisions to the COI Filing Officers' Requirements*
- HR 2016-06, *Revised Outside Employment Disclosure Requirements for Management Personnel Plan (MPP) and Executive Employees*
- HR 2017-16, *Elimination of Criminal Conviction History and Salary History Question in CSU Applications*
- HR 2017-17, *Background Check Policy*
- HR 2018-05, *MPP – Written Merit Evaluation Plans and Performance Evaluations*
- HR/Employment 2020-01, *New Form I-9, Employment Eligibility Verification*
- HR/Leaves 2021-05, *Updated CSU Family Medical Leave*
- HR/Salary 2021-07, *CSU Independent Contractor Guidelines*
- Government Code §13402 and §13403
- CSUSB *Outside Employment Disclosure Requirement for MPP and Executives*
- CSUSB *Relocation Policy – CSUSB Management Employees*

AUDIT TEAM

Audit Manager: Christina Chen
Senior Auditor: Laura Vazquez