

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

January 12, 2024

Dr. Jane Close Conoley, President  
California State University, Long Beach  
1250 Bellflower Boulevard  
Long Beach, CA 90840

Dear Dr. Conoley:

**Subject: Audit Report 23-33, Youth Programs, California State University, Long Beach**

We have completed an audit of *Youth Programs* as part of our 2023-2024 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: Mildred García, Chancellor  
Yammilette Rodriguez, Chair, Committee on Audit  
Jean Picker Firstenberg, Vice Chair, Committee on Audit

**CSU Campuses**

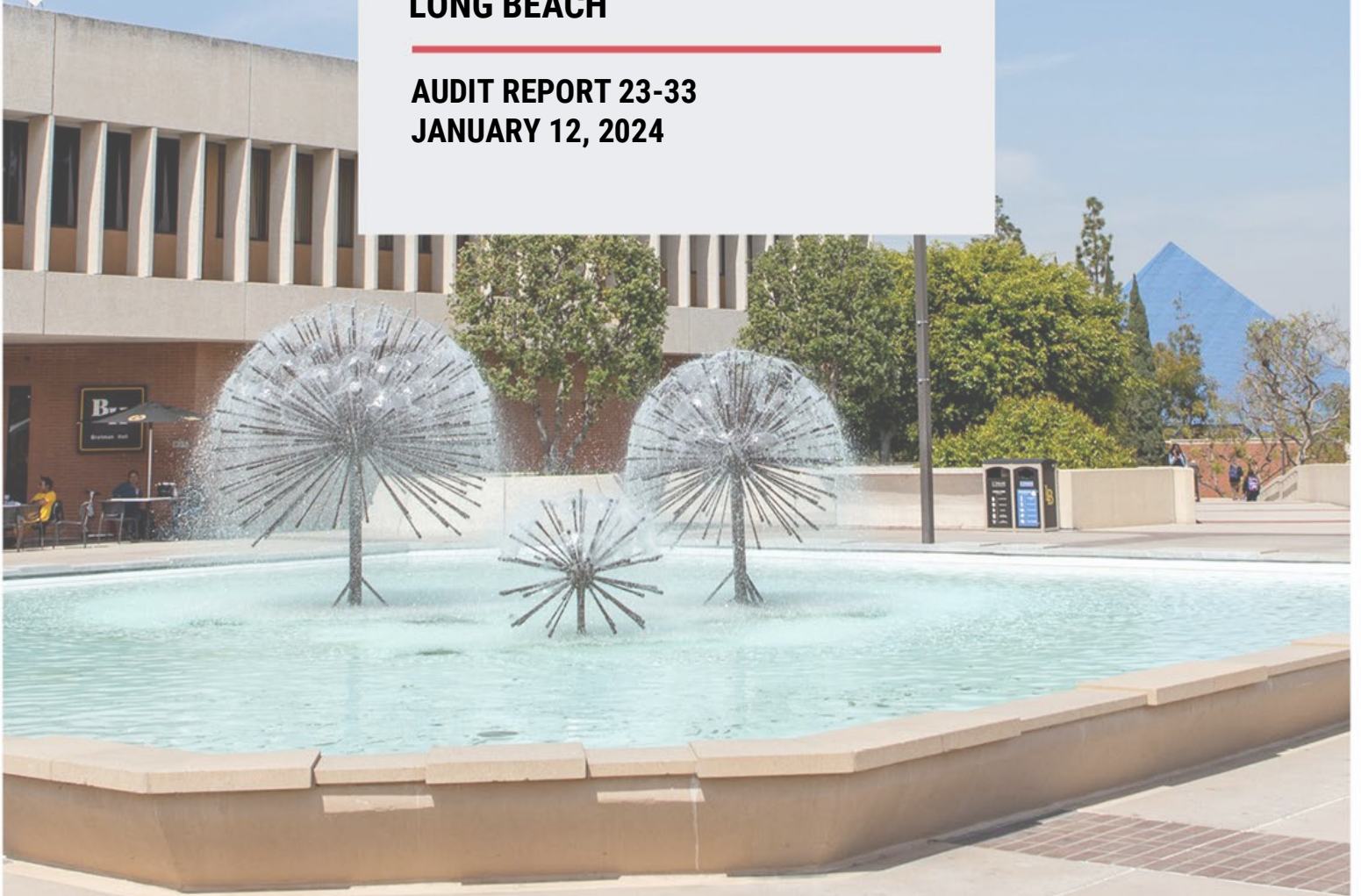
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# YOUTH PROGRAMS

**CALIFORNIA STATE UNIVERSITY,  
LONG BEACH**

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**AUDIT REPORT 23-33  
JANUARY 12, 2024**



## **EXECUTIVE SUMMARY**

### **AUDIT OBJECTIVES AND BACKGROUND**

In accordance with the fiscal year (FY) 2023/24 Audit Plan, as approved by the Board of Trustees, Audit and Advisory Services performed an audit of youth programs at California State University, Long Beach (CSULB).

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls related to youth programs and to ensure compliance with relevant federal and state regulations, Trustee policy, Office of the Chancellor (CO) directives, and campus and auxiliary procedures.

The California State University (CSU) campuses host a wide range of activities, including camps, clinics, workshops, recitals, tournaments, conferences, and competitions, some of which include participants under the age of 18. The CSU strives to offer safe and enjoyable educational environments for youth. In support of that goal, the CSU is committed to protecting youth who participate in programs that are organized by the CSU or take place on CSU campuses. The CSU has zero tolerance for the abuse or mistreatment of youth. Additional information can be found in the body of this report.

### **OVERALL CONCLUSION**

Based upon the results of the work performed within the scope of the audit, except for the weaknesses described below, the operational and administrative controls for youth programs as of September 8, 2023, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

### **AUDIT SCOPE AND RESULTS**

In general, we found that the administration of youth programs was effective, and the programs we reviewed were generally in compliance with CSU policies and procedures. The campus had an established process for registering and approving youth programs administered by the CSULB Research Foundation (Research Foundation).

However, our review did note areas for improvement in the campus oversight and administration of academic instructionally related programs and third-party programs. A summary of the observations noted in the report is presented in the table below. Further details are specified in the remainder of the report.

Area	Processes Reviewed	Audit Assessment
<b>Oversight and Administration</b>	Oversight of youth programs, roles and responsibilities of the campus and auxiliaries, overall process to identify and approve activities, and campus and auxiliary policies and procedures	<i>Observations noted in the governance structure for instructional programs and development of a program handbook for parents and participants</i>
<b>Campus and Auxiliary Programs</b>	Establishment of program policies and procedures, hiring and screening processes, required training, risk-management processes, and insurance requirements	<i>Observations noted in hiring, employee training, and participant forms</i>
<b>Third-Party Programs</b>	Policies and procedures for non-university programs, process for program identification, agreement terms and conditions, insurance requirements, and program marketing	<i>Observation noted in third-party and co-sponsored program agreements</i>

The audit focused on procedures in effect from June 1, 2021, through September 8, 2023. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. Our review was limited to gaining reasonable assurance that essential elements of youth programs were in place and did not examine all aspects of the program.

## OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

### 1. ACADEMIC YOUTH PROGRAMS

#### OBSERVATION

The campus governance structure for administering academic youth programs needed improvement.

The campus has a well-established registration process for Research Foundation-sponsored youth programs as documented in the *Youth Activities and Programs Administrative Guideline*, which defines the role of each party involved in planning, review, approval, implementation, or records retention of activities aimed at youth as the primary participants or attendees. Program directors play a central role in ensuring the success of these programs. Their responsibilities include registration, detailed program review, participant coordination, staff/volunteer selection, policy compliance, and youth protection training. Research Foundation human resources collaborates with various departments, including risk management for insurance and staff/volunteer training, event services for use of campus spaces, and parking and the university police department as needed for effective program execution.

However, we found that the campus did not have a formalized governance structure or documented policies and procedures that clearly defined roles and responsibilities for administration and approval of academic youth programs that were part of the curriculum or took place in a classroom setting. Specifically, the campus did not have a registration process for academic youth programs or a process to identify, track, and assess these programs. We also found that the campus had a decentralized structure where individual departments hosting programs and activities involving minors had oversight responsibilities. Through website searches and inquiries during fieldwork, we identified three academic youth programs.

An adequate governance structure helps to ensure that campus objectives will be met and that youth programs will be aligned with campus priorities and will comply with relevant laws, regulations, and systemwide requirements.

#### RECOMMENDATION

We recommend that the campus:

- a. Formalize and document the structure for administering academic youth programs, including documented policies and procedures that define roles and responsibilities and specify lines of authority for program approval.
- b. Develop and implement a registration process to identify, track, and assess all academic youth programs.

**MANAGEMENT RESPONSE**

We concur. The campus will take the following actions by August 26, 2024:

- a. Formalize and document the structure for administering academic youth programs, including documented policies and procedures that define roles and responsibilities and specify lines of authority for program approval.
- b. Develop and implement a registration process to identify, track, and assess all academic youth programs.

**2. THIRD-PARTY AND CO-SPONSORED PROGRAMS**

**OBSERVATION**

Third-party and co-sponsored programs did not always include all of the key risk management elements in the agreements or required insurance coverage.

We reviewed six third-party agreements and two co-sponsored program facility -use agreements, and we found that:

- None of the agreements had a requirement stating that all individuals responsible for minors will comply with the California Child Abuse and Neglect Reporting Act (CANRA).
- None of the agreements had a statement requiring all incidents or allegations of abuse or sexual misconduct involving adults or youth to be reported to the CSU and/or auxiliaries.
- None of the agreements stated that employees and volunteers were required to obtain training related to the protection of minors.
- Four agreements were not dated; therefore, we were unable to verify whether they were executed prior to the program start date.
- Five agreements did not include a separate Additional Insured Endorsement form explicitly stating “the State of California, Trustees of the California State University, Long Beach, and the officers, employees, volunteers and agents of each of them as additional insureds.”
- Five programs did not include the minimum insurance coverage required in the California State University Risk Management Authority (CSURMA) guidance document and/or required in the facility use agreement.

Additionally, for the two co-sponsored programs, although there were some supporting documents provided, such as the proposal, budget, schedule, and facility use agreement, the co-sponsored programs did not have an executed agreement with the campus documenting key elements of the program, including roles and responsibilities of the campus and third party, incorporation of the finalized program scope, compliance with CSU requirements such as screening and training, responsibility and reporting process for incidents or allegations, and obtaining of liability waivers.

Establishing third-party agreements and obtaining required insurance provide greater assurance of compliance with program policies and procedures and help reduce the risk of misunderstandings and miscommunication regarding rights and responsibilities and liabilities to the campus and auxiliaries.

**RECOMMENDATION**

We recommend that the campus:

- a. Develop third-party and co-sponsored agreement templates that include the key risk management elements noted above and any other necessary elements.
- b. Provide training and guidance to key personnel on the updated templates, required documentation for co-sponsored programs, and insurance requirements.

<b>MANAGEMENT RESPONSE</b>
<p>We concur. The campus will take the following actions by August 26, 2024:</p> <ul style="list-style-type: none"><li>a. Develop third-party and co-sponsored agreement templates that include the key risk management elements noted above and any other necessary elements.</li><li>b. Provide training and guidance to key personnel on the updated templates, required documentation for co-sponsored programs, and insurance requirements.</li></ul>



**3. EMPLOYEES AND VOLUNTEERS**

**OBSERVATION**

The hiring and training of employees and volunteers working with youth in programs sponsored by the campus and Research Foundation needed improvement.

We reviewed 40 employees and volunteers from eight programs sponsored by the Research Foundation and two programs sponsored by the campus, and we found that:

- Code-of-conduct forms were not completed for 17 employees and volunteers. In addition, one employee completed the form after the program end date.
- Mandated reporter forms were not completed for 13 employees and volunteers. In addition, one employee completed the form after the program start date.
- 15 employees and volunteers did not complete any of the required training specific to working with minors. Additionally, two employees completed training after the program end date.
- Three employees did not complete the required repeat training specific to working with minors.

Timely completion of hiring documentation and required training for employees and volunteers working with minors helps protect the health, well-being, and safety of the minors and reduces the risk of legal liability to the campus and auxiliaries.

**RECOMMENDATION**

We recommend that the campus, in conjunction with the Research Foundation:

- a. Develop a documented tracking process to monitor the completion of hiring forms and required training, and communicate the process to key personnel.

- b. Remind key personnel involved in the hiring of employees and volunteers working with minors to timely complete all hiring and training documentation.

**MANAGEMENT RESPONSE**

We concur. The campus will take the following actions by July 1, 2024:

- a. Develop a documented tracking process to monitor the completion of hiring forms and required training, and communicate the process to key personnel.
- b. Remind key personnel involved in the hiring of employees and volunteers working with minors to timely complete all hiring and training documentation.

**4. PARTICIPANT FORMS**

**OBSERVATION**

Participant forms were not always completed for programs sponsored by the campus and Research Foundation.

We reviewed participant forms for 50 youth participants, and we found that:

- In 10 instances, the signature page of the Release of Liability, Promise Not to Sue, Assumption of Risk and Agreement to Pay Claims form was not provided; therefore, we were unable to determine whether the forms were completed prior to the program start date.
- In seven instances, the Release of Liability, Promise Not to Sue, Assumption of Risk and Agreement to Pay Claims was not completed.
- In 14 instances, other required participant forms such as the emergency contact information form, voluntary medical disclosure statements, and photo/video authorization and release waivers, were not completed.

Completed participant forms help to ensure appropriate emergency response and timely communication with parents and guardians and decreases the risk of liability or reputational damage.

**RECOMMENDATION**

We recommend that the campus, in conjunction with the Research Foundation:

- a. Develop a documented tracking process to monitor the completion of participant forms, and communicate the process to key personnel.
- b. Remind key personnel working with minors to timely collect and maintain all related forms.



**MANAGEMENT RESPONSE**

We concur. The campus will take the following actions by July 1, 2024:

- a. Develop a documented tracking process to monitor the completion of participant forms, and communicate the process to key personnel.
- b. Remind key personnel working with minors to timely collect and maintain all related forms.

**5. PROGRAM HANDBOOK**

**OBSERVATION**

The campus had not developed a program handbook or equivalent for campus- and Research Foundation-sponsored youth programs to provide to parents and participants.

Although most program directors provided an orientation and verbally communicated information to parents and participants, we found that departments did not always distribute a program handbook, or an equivalent document, to participants and their parents. At a minimum, the following information should be communicated:

- Procedures for notifying a youth’s parent/legal guardian in case of emergency, including medical or behavioral situations.
- Information for parents/legal guardians on how to contact the participant during the program.
- Program rules and conduct expectations for participants in the program, including the fact that participants must abide by all CSU regulations and may be removed from the program for failure to do so.
- A description of the process to be followed if a participant, group leader, or other individual associated with a youth program is alleged to have violated university policies or program rules, including the process for dismissal and removal from the program and the process for how a participant who has been dismissed or removed from the program early is picked up by a parent, legal guardian, or other responsible adult.
- Housing-specific policies, if applicable.

Program handbooks or documented information disseminated to parents and participants help to promote the safety and protection of minors and increase assurance that program participants will be compliant with campus, systemwide, and other requirements.

**RECOMMENDATION**

We recommend that the campus develop a program handbook or information brochure for campus- and Research Foundation-sponsored youth programs to distribute to parents and participants.

**MANAGEMENT RESPONSE**

We concur. The campus will develop a program handbook or information brochure for campus- and Research Foundation-sponsored youth programs to distribute to parents and participants by July 1, 2024.

## GENERAL INFORMATION

### ADDITIONAL BACKGROUND

The mission of the California State University (CSU) includes advancing and extending knowledge, learning, and culture; providing opportunities for individuals to develop intellectually, personally, and professionally; and providing public services that enrich the university and its communities. The provision of activities and programs for youths (individuals under the age of 18) at CSU campuses is a natural extension of this mission. Some examples of instances when youths can be found on CSU campuses include academic enrichment programs, music and performing arts workshops, sports camps, college readiness programs, and licensed childcare programs, among others.

For the purpose of our review, youth programs refer to activities or events that include youths conducted or organized by the university or auxiliary on or off-campus, or by a third-party on campus, during which the university, auxiliary or third party assumes the responsibility for the care, custody, and control of the youth participants. Youth programs do not include (1) activities or events where parents, guardians, or affiliated program leaders (e.g. school teacher, counselor) are responsible for the care, custody, and control of youth participants; (2) private, personal events (e.g., birthday parties, weddings) that occur at university facilities; or (3) events open to the general public (e.g., intercollegiate athletic events, concerts, class tours). Our review also did not include youths who were matriculated students.

Activities involving youth pose a variety of risks due to the potential for issues such as sexual abuse, physical or psychological injury, and bullying. A single incident of noncompliance or failure to protect youth could have significant financial and reputational consequences. The CSU has a responsibility to protect the safety and welfare of youth participating in programs sponsored by, or occurring on, CSU campuses. There are few legal and regulatory requirements specific to hosting youth programs and activities on university campuses. CANRA identifies certain groups of employees as mandated reporters of child abuse, including those whose duties involve regular contact with children, and imposes a legal requirement on these employees to report suspected child abuse or neglect. Additionally, Education Code (EC) §10911.5 requires an employer to fingerprint any employee who will have direct contact with minor children in a recreational program and to submit the fingerprints to the Department of Justice.

The CSU has addressed these regulatory requirements in its systemwide policies. In 2021, CSU Systemwide Risk Management issued *Managing Risk in Youth Programs Resource Guide* to provide systemwide guidance for ensuring the protection of youth beyond these legal requirements, to address areas such as program approval/registration, additional screening in the hiring process, required training, behavioral expectations, staffing requirements, and mechanisms for reporting potential issues. Additionally, in 2017, Systemwide Risk Management, through CSURMA, entered into a partnership with Praesidium, a leader in abuse risk-management services, to provide free and discounted resources to campuses relating to the protection of youth, including training sessions and self-assessment tools. This partnership continues today.

At CSULB, responsibility for establishing and maintaining effective youth programs is distributed among various departments. The program directors are directly responsible for the day-to-day operations and programmatic activities of these programs. Additionally, the procurement of insurance for programs sponsored by the university and the Research Foundation resides with risk management, and oversight and responsibility for managing third-party sponsored programs resides with event services. Also, Research Foundation human resources assists with hiring and fingerprinting services and facilitates the registration and approval process for youth programs sponsored by the Research Foundation. Program activities varied and included childcare facilities, athletic camps and clinics, academic enrichment programs, a community

clinic, outreach activities, tutoring programs, high schools on campus, and third-party sponsored events.

## 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:

- Government Code §13403 and §13404, *State Leadership Accountability Act*
- EC §89005.5, *Use of CSU Name*
- EC §10911.5, *Community Recreation Programs*
- California Penal Code 11165.7, *Child Abuse and Neglect Reporting Act (CANRA)*
- Executive Order (EO) 669, *Delegation of Authority; Leases to Obligate the University*
- EO 1051, *CSU Use of Approved Waiver of Liability*
- EO 1083, *Mandatory Reporting of Child Abuse and Neglect*
- Integrated California State University Administrative Manual §1101.00, *Delegation of Authority to Obligate the University*
- Coded Memorandum Human Resources (HR) 2017-17, *Background Check Policy*
- HR 2015-10, *Volunteer Policy*
- Coded Memorandum Risk Management 2012-01, *CSU Insurance Requirements*
- *CSU Managing Risk in Youth Programs Resource Guide*
- CSURMA Auxiliary Organization Risk Management Association (AORMA) Policy and Procedure L-6, *Requirement that Participant Accident Insurance be Purchased for all Child Care and Camp Operations Involving Minors*
- CSURMA AORMA Handbook, *AORMA Recommended Facilities Use Agreement and Handbook*
- CSURMA AORMA Handbook, *AORMA Recommended Waiver and Handbook*
- CSURMA AORMA Contracts with Third Parties Involving Activities with Minors Policy
- CSULB Youth Activities and Programs Administrative Guideline

## AUDIT TEAM

Senior Audit Manager: Christina Chen

Senior Auditor: Laura Vazquez