

**OFF-CAMPUS ACTIVITIES**

**CALIFORNIA STATE POLYTECHNIC UNIVERSITY,  
POMONA**

**Audit Report 09-58  
January 11, 2010**

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## **ABBREVIATIONS**

CCS-L	Center for Community Service-Learning
CSPUP	California State Polytechnic University, Pomona
CSU	California State University
EO	Executive Order
GC	Government Code
OCA	Off-Campus Activities
REP	Resolution of the Committee on Educational Policy

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## **EXECUTIVE SUMMARY**

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2008, the Board of Trustees, at its January 2009 meeting, directed that *Off-Campus Activities* (OCA) be reviewed. The Office of the University Auditor has never reviewed OCA as a combined subject but certain aspects have received some coverage as part of the *Risk Management and Insurance* and *Student Activities* audits in 2003 and 2004, respectively.

We visited the California State Polytechnic University, Pomona (CSPUP) campus from June 22, 2009, through July 23, 2009, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant risk exposures if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: study abroad, field trips, and community engagement. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls for off-campus activities in effect as of July 23, 2009, taken as a whole, were sufficient to meet the objectives stated below.

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

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

### **STUDY ABROAD [6]**

The campus used different forms for structuring exchange agreements that also lacked appropriate authorizing signatures and liability indemnifications. The campus inappropriately used direct payments for study abroad and unnecessarily cut checks payable to CSPUP.

### **FIELD TRIPS [9]**

Field trip policies and procedures did not provide for the collection of emergency contact information nor provide for the adequate training or monitoring of department compliance.

### **COMMUNITY ENGAGEMENT [11]**

The campus did not use appropriate partner agreements in, nor consistently document adherence to several best practices for academic internships and service learning partnerships.

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## INTRODUCTION

### **BACKGROUND**

In 1999, former Governor Gray Davis called for a community service requirement for all students of California's public higher education institutions. In response, the Board of Trustees passed a resolution of the Committee on Educational Policy (REP) 03-02-00, *Community Service: Responding to the Governor's Call*, which requires campus presidents to ensure that all students have opportunities to participate in community service/service learning. The resolution further required that the chancellor annually report to the Board of Trustees on efforts to provide those opportunities to all students.

In November 2005, the Board of Trustees also enacted changes to California Code of Regulations, Title 5 §41301, *Student Code of Conduct*, through REP 11-05-07 that updated expectations and clarified the applicability of the code to off-campus behaviors.

Some *Off-Campus Activities* (OCA) definitions provided in the 2002 California State University (CSU) publication *Best Practices for Managing Risks in Service Learning* include:

#### **Service Learning**

A teaching method that promotes student learning through active participation in meaningful and planned service experiences in the community that are directly related to course content. Through reflective activities, students enhance their understanding of course content, general knowledge, sense of civic responsibility, self-awareness, and commitment to the community.

#### **Community Service**

Any work provided by individuals that contributes to the quality of life in the community. Community service work can be provided in several ways and for different purposes. Students may be involved in community service on their own, with a group or club, or through academic course work.

Other major OCA components are internships, field trips, study abroad, and student exchange programs.

#### **Internships**

There is no common, CSU systemwide definition of internships. One campus defines them as follows:

Internships are processes of education, which formally integrate the students' academic study with practical experience in cooperating organizations. Through this interaction of study and practical experience, students enhance their academic knowledge, their personal development, and their professional preparation. The teaching faculty and the on-site supervisors share in the educational process of internship.

### **Field Trips**

Similar to academic internships, the CSU does not specifically define field trips on a systemwide basis. One campus defines field trips as “required activities outside the regularly scheduled class room/laboratory environment led by the faculty and/or university staff,” while another campus uses a somewhat shorter definition of “supervised, curriculum-related activities held off-campus.”

### **Study Abroad**

Study abroad includes the international programs administered on a systemwide basis in the Office of the Chancellor as well as campus-based programs. In 2009/10, the systemwide international program operated through 19 country sites.

Campuses have authority to establish campus-based, study abroad programs that do not compete with the systemwide program. Campus-based, study abroad programs can be either state-funded or self-supporting. They also have to be short-term (one year or less in duration) and cannot be offered as degree programs. In addition, the continuing or extended education divisions of the campus have to operate the self-supporting study abroad programs.

### **Student Exchange Programs**

Student exchange programs are discussed in Education Code §89705(b) and Executive Order 605, *Delegation of Authority to Approve International Student Exchanges, Tuition Waivers for International Students, and Tuition Waivers for Nonresident U.S. Graduate Students*, dated July 21, 1993, as:

Agreements with foreign institutions of higher education, governmental agencies, or nonprofit corporations or associations executed by the campuses in order to enhance international goodwill and understanding through the exchange of students.

Various CSU campuses also participate in at least one different domestic student exchange program – the National Student Exchange.

In the Office of the Chancellor, the Division of Academic Affairs administers OCA primarily through the Center for Community Engagement and the Office of International Programs. The California State University Risk Management Authority and the Office of Risk Management in the Business and Finance Division at the chancellor’s office also provide some program oversight and certain insurances applicable to OCA. At California State Polytechnic University, Pomona, there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents. The vice president for academic affairs oversees the Center for Community Service-Learning (CCS-L) and the International Center. The vice president for Administrative Affairs oversees University Risk Management. In addition, the CCS-L is also starting to coordinate student activities in community service through the Volunteer Base program, which formerly reported through the vice president for Student Affairs.

## **PURPOSE**

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of OCA and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- ▶ Accountability for off-campus functions has been clearly defined and documented including delineation of roles and responsibilities, provisions for formulation of goals/objectives, and measurement of outcomes.
- ▶ OCA policies, procedures, and standard forms are current and comprehensive and aligned with relevant federal and state laws/regulations and CSU directives.
- ▶ The chancellor's office and the campuses have established adequate mitigating measures for risks in service learning, community service, academic internships, field trips, study abroad, and student exchange programs.
- ▶ Internal controls in service learning, community service, academic internships, field trips, study abroad, and exchange programs operate as intended.
- ▶ There is an equitable balance in the number of incoming versus outgoing students in exchange programs.
- ▶ Access to automated systems containing OCA information is controlled and limited to authorized users; data backup procedures are in place; and physical security over system hardware is adequate.

## **SCOPE AND METHODOLOGY**

The proposed scope of the audit as presented in Attachment B, Agenda Item 2 of the January 27-28, 2009, meeting of the Committee on Audit stated that *Off-Campus Activities* includes service learning, study abroad programs, internships, field trips, and club sports. Subsequent to this presentation, the audit of club sports was deferred based on substantial CSU work-in-progress to develop and implement a systemwide club sports manual.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect for primarily fiscal year 2008/09.

Specifically, we reviewed and tested:

- ▶ Identification of risks and implementation of risk mitigation measures for service learning, community service, academic internships, field trips, study abroad, and student exchange programs.
- ▶ Service learning best practices including site visits and learning agreements with community partners.
- ▶ Involvement with volunteer initiatives.
- ▶ Selection and approval of internships.
- ▶ Field trip notifications and procedures.
- ▶ Execution of study abroad contracts.
- ▶ Relationships with study abroad providers.
- ▶ Student exchange reciprocity.



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# OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

## STUDY ABROAD

### EXCHANGE AGREEMENTS

The campus used different forms for structuring exchange agreements that also lacked appropriate authorizing signatures and liability indemnifications.

At the time of the audit visit, California State Polytechnic University, Pomona (CSPUP) had executed 21 exchange agreements on a variety of documents with different titles and content including:

- ▶ Agreement on Academic Cooperation
- ▶ International Agreement
- ▶ Collaboration Agreement

We found that:

- ▶ Five exchange agreements relied upon multiple governing documents. In addition, the three different document types mentioned above included mediation clauses but did not include liability indemnifications.
- ▶ Campus staff had signed documents establishing three of the exchanges without a delegation of authority from the president. The director of the International Center signed documents for one exchange, two college deans signed documents for a second exchange, and a third exchange was authorized in part by a document signed by the campus provost.

Executive Order (EO) 605, *Delegation of Authority to Approve International Student Exchanges, Tuition Waivers for International Students, and Tuition Waivers for Nonresident U.S. Graduate Students*, dated July 21, 1993, delegates authority to the campus president or designee to initiate and conduct student international exchange agreements.

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

*The California State University Policy Manual for Contracting and Procurement* §240.1 states that it is the campus' responsibility to include, in each contract, terms and conditions necessary to protect the interests of the CSU, comply with applicable laws, reasonably mitigate risks and provide best value to the CSU.

The CSPUP *Risk Management Procedures*, revised August 1, 2006, states that the director of procurement services and the vice president for administrative affairs have been designated by the president as the individuals who have authority to enter into agreements and/or contracts with an

outside organization on behalf of the university and its departments and programs. The *Risk Management Procedures* also state that no other members of the campus community are so authorized.

The procurement and support services director stated that the campus had not received direction to process exchange agreements. The associate vice president of finance and administrative services stated that the campus likely handled exchange agreements without procurement involvement for administrative convenience.

Different governing documents and the absence of appropriate authorizations for exchange agreements increases the risk of misunderstandings and potential legal liabilities.

### **Recommendation 1**

We recommend that the campus:

- a. Standardize exchange agreements that also include insurance or hold harmless provisions.
- b. Determine who should sign exchange agreements and complete an official delegation of authority from the president for this purpose.

### **Campus Response**

- a. We concur. The campus will standardize exchange agreements and incorporate the appropriate insurance or hold harmless provisions.

Timeline: March 31, 2010

- b. We concur. We will complete an official delegation of authority from the president, designating who will sign exchange agreements.

Timeline: March 31, 2010

## **FINANCIAL TRANSACTIONS**

The campus inappropriately used direct payments for study abroad and unnecessarily cut checks payable to CSPUP.

We found that procurement and support services did not execute contracts for any study abroad arrangements at CSPUP. Instead, all business was transacted on a direct pay basis with invoicing by providers and payment through the accounts payable process. CSPUP considered itself as a vendor in this arrangement, and it unnecessarily cut multiple checks payable from the campus to itself.

*The California State University Policy Manual for Contracting and Procurement* §227 sets limits on the types of transactions eligible for direct pay as follows: direct payments may be made for those

types of commitments/obligations for which little or no value can be added by processing the transaction through the standard procurement procedures. The policy manual also states that campuses are responsible for establishing local policies that identify the types and dollar thresholds for transactions authorized for direct payments and associated procedures for exception processing.

The CSPUP *Procedures for Direct Payment of Routine Purchases* were communicated to the campus community through a joint March 17, 2000, memorandum from the former director, procurement and support services and the associate vice president, finance and administrative services and subsequently posted at several campus website locations. These procedures specifically identify authorized direct pay transactions and payments for study abroad providers are not included.

Government Code (GC) §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 associate vice president of finance and administrative services stated that the campus likely handled study abroad arrangements as direct pay for administrative convenience. The director of university accounting services stated that checks were cut to the campus because it had not changed procedures that were necessary prior to implementation of the systemwide Revenue Management Program.

Use of direct pay for study aboard programs exposes the campus and students to inappropriate risks, creates potential misunderstandings with providers, bypasses competitive procurement, and likely results in excessive program costs.

## **Recommendation 2**

We recommend that the campus:

- a. Curtail direct pay transactions in study abroad and contract through procurement and support services.
- b. Eliminate checks cut payable to the campus.

## **Campus Response**

- a. We concur. The university will discontinue direct pay transactions in study abroad activities. Obligations will flow through the procurement and contracting process before payment by accounts payable.

Timeline: March 31, 2010

- b. We concur. The campus will eliminate checks payable to itself in any study abroad payments.

Timeline: March 31, 2010

## FIELD TRIPS

Field trip policies and procedures did not provide for the collection of emergency contact information nor provide for adequate training or monitoring of department compliance.

During our review of documentation for nine field trips, we found that:

- ▶ None of the trip participants provided emergency contact information.
- ▶ The campus could not provide documentation for two field trips.
- ▶ For one trip, a bus was chartered for transportation through the Cal Poly Pomona Foundation, Inc. and it was unclear which entity owned the liability. For another trip, the campus participated in formation of carpools.
- ▶ For the Model United Nations trip, no specific liability waiver was prepared. For other trips, liability waivers were not consistently prepared or retained.
- ▶ Instructors frequently kept liability waivers and did not file them with their academic department offices.
- ▶ For one trip, the instructor collected vehicle insurance information for drivers.
- ▶ For one trip, non-authorized participants were included.

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

- ▶ Plan and include in the itinerary all destinations and alternatives if an emergency prevents entry to the original destination. Send a copy of the itinerary to campus public safety.
- ▶ Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.
- ▶ Communicate codes of conduct for staff and students.

The CSPUP brochure, *Field Trip Guidelines*, revised May 25, 2009, states that:

- ▶ All field trips shall begin and end at the field trip site.
- ▶ All field trip participants must complete and submit the appropriate liability waiver (including the designation of an emergency contact person) before departing on the trip. The waivers are to be retained in the academic department office.
- ▶ A list of all persons participating in the field trip shall be retained in the academic department office (with a designated faculty/staff contact person in charge of safety) in the event of a major accident or emergency.
- ▶ Faculty/staff field trip participants shall complete all paperwork and obtain the necessary management approvals required for traveling on university business, in advance of the field trip.
- ▶ Authorized participants of CSPUP field trips are CSPUP faculty, staff (academic), approved volunteer employees, enrolled students, and enrolled College of the Extended University students.

GC §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 professors for some of the related courses were not aware of policies and procedures for field trips. In addition, several instructors indicated that the risk management forms did not include a specific space for students to provide emergency contact information.

The lack of adequate compliance with policies and procedures to control the risks associated with off-campus field trips unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

### **Recommendation 3**

We recommend that the campus:

- a. Revise field trip forms and procedures to ensure that participants provide emergency contact information.
- b. Provide training to constituents on revised field trip requirements.
- c. Implement a reliable process to monitor and enforce compliance with field trip policies and procedures.

### **Campus Response**

- a. We concur. Academic affairs will work with the office of risk management to revise field trip forms and procedures to include emergency contact information.

Timeline: March 31, 2010

- b. We concur. The office of organizational development and training will develop a training module for use by faculty. The office of risk management will develop an informational website for students.

Timeline: July 31, 2010

- c. We concur. Academic affairs will develop a process to monitor and enforce compliance with field trip policies and procedures.

Timeline: July 31, 2010

## **COMMUNITY ENGAGEMENT**

### **PARTNER AGREEMENTS**

The campus did not use appropriate partner agreements in academic internship and service learning partnerships.

We reviewed ten academic internships and ten service learning partnerships for fiscal year 2008/09 and found that:

- ▶ Appropriate placement agreements with the community partner were not on file for any of the academic internships.
- ▶ Either the associate vice president of undergraduate studies or the former director of the Center for Community Service Learning executed all service learning agreements with the community partners without a delegation of authority from the president. In addition, some provisions in the service learning agreement were incomplete.

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

*The California State University Policy Manual for Contracting and Procurement* §102 requires campus presidents to maintain documentation on delegations of purchasing authority as follows:

responsibility for the preparation of campus internal policies and procedures consistent with the provision of this manual remains with the campus presidents. The procedures also state that should campus presidents choose to further delegate their purchasing authority, campuses must maintain documentation of such delegation.

The CSPUP *Risk Management Procedures*, revised August 1, 2006, states that the director of procurement services and the vice president for administrative affairs have been designated by the president as the individuals who have authority to enter into agreements and/or contracts with an outside organization on behalf of the university and its department and programs. The *Risk Management Procedures* also state that no other members of the campus community are so authorized.

The procurement and support services director stated that they had not been directed to process academic internship and service learning agreements. The associate vice president of finance and administrative services stated that the campus likely set up academic internship and service learning arrangements without procurement involvement for administrative convenience.

Failure to obtain appropriate agreements in community engagement arrangements affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

#### **Recommendation 4**

We recommend that the campus:

- a. Implement appropriate agreements with community partners for academic internships.
- b. Determine who should sign service learning agreements and complete an official delegation of authority for this purpose.

#### **Campus Response**

- a. We concur. Academic affairs will develop the appropriate agreements with the procurement and support services department and implement a procedure of sign-offs of appropriate parties before agreements are executed.

Timeline: July 31, 2010

- b. We concur. Signature authority will be delegated to the associate vice president, undergraduate studies.

Timeline: March 31, 2010

## **SITE VISITS AND PARTICIPANT DOCUMENTATION**

The campus was unable to consistently document adherence to several best practices for management of academic internships and service learning partnerships.

We reviewed ten academic internship courses and ten service learning partnerships for fiscal year 2008/09 and found that:

- ▶ The campus was unable to provide documentation that it performed a preliminary site visit or that faculty had sufficient familiarity with the community partner for any of the academic internship courses.
- ▶ The campus did not provide documentation of detailed instructional agendas with health/safety instructions for academic internships.
- ▶ Site visits with service learning partners were not adequately documented.
- ▶ Student participants were not required to provide emergency contact information for academic internships or service learning courses.
- ▶ With a few exceptions, students did not sign a release of liability.

The 2002 CSU publication, *Best Practices for Managing Risks in Service Learning*, provides for site visits to community-based organizations, orientation presentations, and student placement records.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that the campus is responsible to manage and control risks, and that one way in which liability and exposure related to activities linked to the mission of the CSU could be minimized is through the use of third-party waivers or hold harmless agreements. Additionally, the policy includes multiple guidelines to control risk in off-campus activities, including:

- ▶ Visit the general area where the activity will be held prior to the field study course or demonstrate sufficient knowledge of the area.
- ▶ Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.

The associate vice president for undergraduate studies stated that internship practices varied from one academic department to another. Various academic administrators and some of the professors with instructional responsibility for intern courses indicated that students identified their own internship opportunities and only presented arrangements for approval. They also stated that risk management did not specifically request emergency contact information for either internships or service learning.



Failure to visit service learning sites and communicate appropriate information regarding policies, procedures, and risks to students in community engagement arrangements affects student safety and exposes the university to financial loss and/or embarrassment due to misunderstandings of risk and responsibilities.

**Recommendation 5**

We recommend that the campus:

- a. Perform and document site visits.
- b. Prepare detailed instructional agendas with health/safety instructions for academic internships.
- c. Obtain emergency contact information for student participants in academic internships and service learning courses.
- d. Require students to sign a release of liability.

**Campus Response**

- a. We concur. Academic affairs will identify appropriate individuals responsible for conducting site visits and implement a procedure for documenting these visits.

Timeline: March 31, 2010

- b. We concur. The office of risk management will assist the Center for Community Service Learning in developing written instructions to include health and safety concerns.

Timeline: July 31, 2010

- c. We concur. The office of risk management will obtain and retain emergency contact information from participants.

Timeline: March 31, 2010

- d. We concur. The office of risk management will work with the Center for Community Service Learning to ensure the appropriate release of liability is provided for the student's signature.

Timeline: March 31, 2010

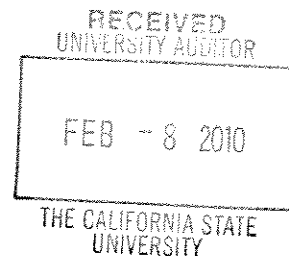
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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
J. Michael Ortiz	President
Thresa Ansley	Study Abroad Coordinator
Ed Barnes	Vice President for Administrative Affairs and Chief Financial Officer
Barbara Burke	Professor, Chemistry
James Burke	Professor, Collins College of Hospitality Management
Gary Carlton	Professor, Biological Sciences
Cynthia Chatfield	Administrative Analyst Specialist
Valerie Eberle	Manager, Benefits, Workers Compensation and Risk Programs
U. J. Fan	Dean, College of the Extended University
Patricia de Freitas	Chair, Ethnic and Women's Studies Department
Debra Garr	Contract Specialist and Asset Management Lead
Jean Gipe	Interim Associate Dean, College of Agriculture
Michael Godfrey	Associate Dean, Collins College of Hospitality Management
Christina Gonzalez-Salgado	Civic Engagement Coordinator
Kathy Harper	Administrative Assistant to Associate Vice President, Finance and Administrative Services
Tami Harshberger	Administrative Support Coordinator, Food Marketing and Agribusiness Management
Gary Kinsey	Associate Dean, College of Education and Integrative Studies
Marvin Klein	Professor, Food Marketing and Agribusiness Management
Darwin Labordo	Associate Vice President, Finance and Administrative Services
Helen Lee	Accounts Payable Coordinator
Iris Levine	Chair, Music Department
Mark Lopez	Director, Budget Services
Maria Martinez	Registrar
Leah Newell	Associate Director, International Center
Jonathan Nourse	Chair, Geological Sciences Department
Vicki Peden	Associate Dean, College of Business Administration
Claudia Pinter-Lucke	Associate Vice President, Undergraduate Studies
Kathleen Prunty	Director, Procurement and Support Services
Sharon Reiter	Associate Vice President, Human Resource Services
Angelina Shultz	Director, Student Accounting and Cashiering Services
Clifford Stover	Professor, Mechanical Engineering
Don Straney	Dean, College of Science
Kathleen Street	Associate Vice President, Enrollment Services
Jeff Tennis	Associate Registrar
Dale Turner	Associate Dean, College of Letters, Arts and Social Sciences
Karina Villagran	Office Coordinator, Center for Community Service-Learning
Al Viteri	Director, University Accounting Services
Joice Xiong	Director, Internal Audits



Office of the Vice President  
for Administrative Affairs



February 1, 2010

Mr. Larry Mandel, University Auditor  
Office of the Auditor  
The California State University  
400 Golden Shore, Suite 210  
Long Beach, CA 90802

Dear Mr. Mandel:

**Subject: Campus Response to Recommendations of Off-Campus Activities 09-58**

Enclosed is California State Polytechnic's campus response to the Off-Campus Activities Audit 09-58. We appreciate the effort you and your staff have made to indicate areas where our procedures or internal controls could be strengthened. We will take the necessary actions to address the report's recommendations.

Please direct questions concerning the response to Darwin Labordo, Associate Vice President of Finance and Administrative Services and Associate Chief Financial Officer at 909-869-2008 or [dlabordo@csupomona.edu](mailto:dlabordo@csupomona.edu).

Sincerely,

Edwin A. Barnes, III, Vice President  
Administrative Affairs

Cc: J. Michael Ortiz, President  
Dr. Marten denBoer, Vice President, Academic Affairs  
Dr. Douglas R. Freer, Vice President, Student Affairs  
Christina Gonzalez-Salgado, Community Collaboration Coordinator, Center for  
Community Service-Learning  
Darwin Labordo, Associate Vice President, Finance & Administrative Services  
Leah Newell, Associate Director, International Center  
Dr. Claudia Pinter-Lucke, Associate Vice President, Undergraduate Studies  
Sharon Reiter, Associate Vice President, Human Resource Services  
Dr. Faiza W. Shereen, Director, International Center  
Kathleen Street, Associate Vice President, Enrollment Services  
Joice Xiong, University Auditor

Enclosure 3801 West Temple Avenue, Pomona, CA 91768 Telephone (909) 869-3020 Fax (909) 869-4541

## OFF-CAMPUS ACTIVITIES

### CALIFORNIA STATE POLYTECHNIC UNIVERSITY, POMONA

#### Audit Report 09-58

## STUDY ABROAD

### EXCHANGE AGREEMENTS

#### Recommendation 1

We recommend that the campus:

- a. Standardize exchange agreements that also include insurance or hold harmless provisions.
- b. Determine who should sign exchange agreements and complete an official delegation of authority from the president for this purpose.

#### Campus Response

- a. We concur. The campus will standardize exchange agreements and incorporate the appropriate insurance or hold harmless provisions.

Timeline: March 31, 2010

- b. We concur. We will complete an official delegation of authority from the president, designating who will sign exchange agreements.

Timeline: March 31, 2010

### FINANCIAL TRANSACTIONS

#### Recommendation 2

We recommend that the campus:

- a. Curtail direct pay transactions in study abroad and contract through procurement and support services.
- b. Eliminate checks cut payable to the campus.

**Campus Response**

- a. We concur. The University will discontinue direct pay transactions in study abroad activities. Obligations will flow through the procurement and contracting process before payment by Accounts Payable.

Timeline: March 31, 2010

- b. We concur. The campus will eliminate checks payable to itself in any study abroad payments.

Timeline: March 31, 2010

**FIELD TRIPS**

**Recommendation 3**

We recommend that the campus:

- a. Revise field trip forms and procedures to ensure that participants provide emergency contact information.
- b. Provide training to constituents on revised field trip requirements.
- c. Implement a reliable process to monitor and enforce compliance with field trip policies and procedures.

**Campus Response**

- a. We concur. Academic Affairs will work with the Office of Risk Management to revise field trip forms and procedures to include emergency contact information.

Timeline: March 31, 2010

- b. We concur. The Office of Organizational Development and Training will develop a training module for use by faculty. The Office of Risk Management will develop an informational website for students.

Timeline: July 31, 2010

- c. We concur. Academic Affairs will develop a process to monitor and enforce compliance with field trip policies and procedures.

Timeline: July 31, 2010

## COMMUNITY ENGAGEMENT

### PARTNER AGREEMENTS

#### Recommendation 4

We recommend that the campus:

- a. Implement appropriate agreements with community partners for academic internships.
- b. Determine who should sign service learning agreements and complete an official delegation of authority for this purpose.

#### Campus Response

- a. We concur. Academic Affairs will develop the appropriate agreements with the Procurement and Support Services department and implement a procedure of sign-offs of appropriate parties before agreements are executed.

Timeline: July 31, 2010

- b. We concur. Signature authority will be delegated to the Associate Vice President, Undergraduate Studies.

Timeline: March 31, 2010

### SITE VISITS AND PARTICIPANT DOCUMENTATION

#### Recommendation 5

We recommend that the campus:

- a. Perform and document site visits.
- b. Prepare detailed instructional agendas with health/safety instructions for academic internships.
- c. Obtain emergency contact information for student participants in academic internships and service learning courses.
- d. Require students to sign a release of liability.

#### Campus Response

- a. We concur. Academic Affairs will identify appropriate individuals responsible for conducting site visits and implement a procedure for documenting these visits.

Timeline: March 31, 2010

- b. We concur. The Office of Risk Management will assist the Center for Community Service Learning in developing written instructions to include health and safety concerns.

Timeline: July 31, 2010

- c. We concur. The Office of Risk Management will obtain and retain emergency contact information from participants.

Timeline: March 31, 2010

- d. We concur. The Office of Risk Management will work with the Center for Community Service Learning to ensure the appropriate release of liability is provided for the student's signature.

Timeline: March 31, 2010

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR



BAKERSFIELD

March 5, 2010

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel  
University Auditor

FRESNO

FROM: Charles B. Reed  
Chancellor

FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-58 on *Off-Campus Activities*,  
California State Polytechnic University, Pomona

LONG BEACH

LOS ANGELES

In response to your memorandum of March 5, 2010, I accept the response as submitted with the draft final report on *Off-Campus Activities*, California State Polytechnic University, Pomona.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS