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February 1, 2017

Dr. Dianne F. Harrison, President
California State University, Northridge
18111 Nordhoff Street
Northridge, CA 91330-8230

Dear Dr. Harrison:

Subject: Audit Report 16-57, *International Activities*, California State University, Northridge

We have completed an audit of *International Activities* as part of our 2016 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 has been posted to the Office of 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,



Larry Mandel
Vice Chancellor and Chief Audit Officer

c: Timothy P. White, Chancellor

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The California State University
Office of Audit and Advisory Services

INTERNATIONAL ACTIVITIES

**California State University,
Northridge**

Audit Report 16-57
December 16, 2016

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of administrative and operational controls for international activities and to ensure compliance with relevant governmental regulations; Trustee policy; Office of the Chancellor (CO) directives; and campus procedures.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, a few specific control weaknesses were noted; generally, however, controls were adequate, appropriate, and effective to provide reasonable assurance that risks were being managed and objectives were met.

Of significance is the control weakness related to the campus' non-compliance with its policies and procedures for developing and approving travel/study courses. This was partly due to the ineffective communication of campus policies and expectations to academic departments responsible for submitting proposals. The campus was also lacking certain records for matriculating international students that provide evidence of compliance with legal and regulatory requirements. Other issues included the need to provide formal training for staff or faculty who led travel/study courses and to update the campus emergency procedures for students and staff traveling internationally.

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

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. DEVELOPMENT AND APPROVAL OF TRAVEL/STUDY COURSES

OBSERVATION

The campus was not in compliance with its policies and procedures regarding the development and approval of proposed travel/study courses.

Campus policies and procedures addressing the development and approval of travel/study courses included requirements regarding the administrative and academic components of the trip and a specific chain of approval for those components that ended with the campus president. However, we noted that none of the three faculty-led travel/study courses we selected for review had gone through the development and approval process.

Adherence to campus policies regarding the development and approval of travel/study courses provides greater assurance that international travel opportunities will be conducted in a safe and consistent manner.

RECOMMENDATION

We recommend that the campus comply with its policies and procedures regarding the development and approval of proposed travel/study courses.

MANAGEMENT RESPONSE

We concur. The campus will review and edit the current policy for proposed international student travel associated with campus courses so it is in alignment with system requirements for approvals and the definition of study abroad. The policy will be communicated to the campus when completed and reiterated each academic year.

Expected completion date: May 1, 2017

2. STUDY-ABROAD TRAINING SESSIONS

OBSERVATION

The campus did not provide or require formal training sessions for staff or faculty who led study-abroad programs and other international activities.

According to EO 1081, the campus must provide a training session to individuals leading international activities that covers emergency-response training, communication from abroad, the student conduct code, the alcohol and drug policy, and disciplinary procedures, in addition to other country- or program-specific information.

Leader training for staff and faculty in charge of study-abroad and other international activities provides greater assurance that these trips will be conducted in a manner that more fully considers the health and safety of participants.

RECOMMENDATION

We recommend that the campus:

- a. Provide and require attendance at formal training sessions incorporating all topics required by systemwide policy to all staff and faculty who lead study-abroad programs and other international activities.
- b. Retain evidence of the completed training.

MANAGEMENT RESPONSE

We concur.

- a. The campus will develop a formal training session incorporating all topics required by systemwide policy. This training session will be required for all staff and faculty who lead study-abroad programs. This requirement will be communicated to the campus when completed and reiterated each academic year.
- b. The campus will develop record retention processes documenting the completed training.

Expected completion date: May 1, 2017

3. EMERGENCY PREPAREDNESS

OBSERVATION

The campus did not adequately document its emergency procedures for students and staff traveling internationally.

We found that although the campus International and Exchange Service Center had detailed procedures addressing required steps in the event that a student or staff member was affected by an overseas emergency, we could not locate a similar document that outlined the roles and responsibilities of other departments such as risk management, academic affairs, campus communications, or the president's office.

Establishing comprehensive emergency protocols and procedures for students and staff traveling internationally helps ensure the health and safety of students, staff, and faculty and decreases potential legal liabilities.

RECOMMENDATION

We recommend that the campus adequately document its emergency procedures for students and staff traveling internationally.

MANAGEMENT RESPONSE

We concur. The campus will document its emergency procedures for students and staff traveling internationally.

Expected completion date: May 1, 2017

4. INTERNATIONAL STUDENT RECORDS

OBSERVATION

The campus did not properly maintain certain admissions records for matriculated international students.

Specifically, we reviewed admissions files for 19 international students and found that:

- Three of the eight files for first-time freshmen did not contain copies of the students' high school transcripts to show evidence that the student met curricular and academic standards for admissions.
- Ten of the 19 files did not contain documentation to show evidence that the student met English-language proficiency requirements, such as test scores, proof of attendance at institutions where the primary language of instruction was English, or other justification for waivers of the testing requirement.

Section 4, *Student Records*, of the *CSU Records/Information Retention and Disposition Schedule*, requires that campuses retain both entrance examination reports and high school transcripts for international students for five years after the student's graduation or last date of attendance.

Properly maintaining student records for a sufficient period of time ensures compliance with legal and regulatory requirements and promotes operational best practices.

RECOMMENDATION

We recommend that the campus maintain student records in accordance with systemwide requirements for record retention.

MANAGEMENT RESPONSE

We concur. Effective February 24, 2016 (prior to the audit), all documents related to admission are scanned and retained in international students' secure electronic files for a minimum of five years (this includes high school transcripts). Additionally, in order to document English-language proficiency requirements, the campus now retains International English Language Testing System, Pearson Test of English, and International Test of English Proficiency scores in students' secure electronic files and downloads summary reports of all Test of English as a Foreign Language scores from the Educational Testing Service website

every semester. All such test scores and summary reports will be retained in our secure electronic files for a minimum of five years.

GENERAL INFORMATION

BACKGROUND

In May 2008, the Board of Trustees adopted *Access to Excellence* as the new strategic plan for the CSU. *Access to Excellence* focuses on the intersection of the CSU with the economic, political, and social environment of the state of California, and among its eight commitments is a goal to enhance opportunities for global awareness. Subsequent reports to the Board of Trustees reflect ongoing initiatives to expand the use of academic technologies to bring global education opportunities into the CSU environment; increase mobility for incoming and outgoing exchange, study abroad, and degree-seeking students; review the safety and security environment for specific regional programs abroad; and establish a framework for international activity to share information and best practices that encourage activities while considering the safety of students and institutions.

In 2012, the Office of the Chancellor (CO) issued a new EO that updated requirements for three main areas of international activities: international agreements with overseas educational partners; study abroad and exchange programs for CSU students; and international students hoping to study at a CSU campus. EO 1080, *International Agreements*, requires that all agreements with foreign partners that commit CSU resources must be approved by the campus president after the document is reviewed by designated CO departments. EO 1081, *Study Abroad and Exchange Programs*, and EO 1082, *International Students*, establish requirements for campuses that set up study abroad and/or exchange programs and enroll nonresident international students, respectively, as part of their international activities. The president of each campus is delegated the responsibility for the development, implementation, and oversight of international programs in accordance with these three EOs and other related CSU policy.

All three of the EOs require that international activities be conducted in a manner that demonstrates a clear benefit to the CSU, and that the activities be part of the university's overall mission to educate the citizens of California. The policy on international students further states that recruitment of international students should be part of a broader internationalization strategy that benefits all CSU students, the campus, and international students. The policy regarding study abroad and exchange for CSU students acknowledges the integral role these activities play in the mission of the institution while addressing the importance of minimizing risk to both the participants and the university. In addition to the policies specific to international activities, the CO has related policies addressing risk management concerns for student travelers.

At California State University, Northridge (CSUN), international activities are administered by various campus departments with broad oversight from the senior international officer (SIO), who is appointed by the provost. The SIO is supported by a deputy SIO who provides oversight for the international agreement vetting and approval process and programmatic compliance requirements. Academic departments initiating topic-specific and short-term travel-study programs are responsible for ensuring that requirements are met and receive some support from the International and Exchange Student Center (IESC) and the SIO office. The IESC is also responsible for administering more generalized stateside study-abroad and exchange programs and providing support services to both incoming international students and students planning to participate in travel-study programs. The campus also offers self-

supporting international programs, such as Summer at CSUN and the Intensive English Program, through the campus extended education Tseng College. International admissions resides in the office of admissions and records under the division of academic affairs.

SCOPE

We visited the CSUN campus from August 22, 2016, through September 23, 2016. Our audit and evaluation included the audit tests we considered necessary in determining whether administrative and operational controls are in place and operative. The audit focused on procedures in effect from July 1, 2014, through September 23, 2016.

Specifically, we reviewed and tested:

- Campus coverage, or inclusion in the campus strategic plan, of the systemwide mission to enhance opportunities for global awareness.
- International activities administration and organization, including clear lines of organizational authority and responsibility, and current and comprehensive policies and procedures.
- Processes for the development of study abroad or other student-centered international learning experiences, from conceptualization to planning and approval to implementation.
- Study-abroad program administration, including evidence that important safety requirements, such as student orientations and faculty training, have been implemented.
- Study-abroad student participation records to ensure that all participants have met risk management and program requirements.
- Processes to ensure that international agreements, including those with international student recruiters, are properly vetted by appropriate CO divisions and approved by the campus president.
- Campus compliance with requirements to properly select, assess, and approve the use of third-party providers for international student learning experiences, including a review to ensure that the campus does not engage in any prohibited practices.
- International student administration, including confirmation of visa authority requirements, accurate residency determinations, and proper application of admissions requirements.
- Systems and plans in place to provide assurance that the campus has adequate information on the itineraries, locations, and student emergency contacts in the event an emergency situation arises while students are traveling as part of a CSU-affiliated program.

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 administrative and operational controls, included interviews, walk-throughs, and detailed testing on certain aspects of the international activities conducted on the campus under review. Our review focused specifically on campus-created international programs and did not specifically include partnerships or consortium programs, nor did it include review of every category of international activities available to students.

CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and guidance; CSU Board of Trustee policies; Office of the Chancellor policies, letters, and directives; campus procedures; and other sound administrative practices. 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:

- EO 1041, *California State University Student Travel Policy*
- EO 1051, *Use of Approved Waiver of Liability*
- EO 1062, *Field Trip Policies and Procedures*
- EO 1080, *International Agreements*
- EO 1081, *Study Abroad and Exchange Programs*
- EO 1082, *International Students*
- Coded memorandum Academic Affairs (AA) 2007-25, *Third-Party Program Provider Study Abroad and Administrative Safeguards*
- AA 2015-17, *Non-Resident Tuition Waivers*
- Coded memorandum Risk Management (RM) 2014-01, *High Hazard International Travel*
- RM 2011-02, *Independent International Travel – Students*
- Code of Federal Regulations Title 22, Part 62, *Exchange Visitor Program*
- Code of Federal Regulations, Title 8, Part 214, *Non-Immigrant Classes*
- CSU Admissions Handbook 2015-2016
- Government Code §13402 and §13403
- CSUN *Policies and Procedures for Planning and Approving International Travel/Study Courses*
- CSUN *Insurance and Risk Management: Academic Field Trips*
- CSUN *IESC Operating Manual*

AUDIT TEAM

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