Arizona State University
Office of University Audits
Student Organizations
February 17, 2021

Summary: The Student Organizations audit was included in the Arizona State University (ASU) FY 2021 audit plan approved by the Arizona Board of Regents (ABOR) Audit Committee and ASU senior leadership. The audit focused on the design and effectiveness of administrative, operational, and financial controls related to student organizations. This audit is in support of ASU's mission of Inclusion and Student Success.

Background: Student organizations provide a valuable service to the ASU community by providing leadership development, spirit, activism, public service, educational opportunities and social and cultural connections. Student groups are encouraged to register as a student organization to gain access to a variety of benefits and privileges including University Student Government (USG) and Graduate & Professional Student Association (GPSA) funding for general use, events and travel, and the use of ASU facilities for events and meetings. New student organizations can register at any time during the academic year and re-registration of student organizations is an annual process that must be completed each academic year in the spring semester.

Student Engagement staff at each campus provide resources and support to ensure the success of student organizations. Although registered student organizations remain independent, voluntary organizations not sponsored by the University, student organizations are a reflection of ASU and are expected to follow University guidelines and policies. ASU Student Engagement has published a Student Organization Handbook online that provides guidance to organizations on all four campuses and includes organization requirements, new student organization registration, organization re-registration, event and meeting reservations, event hosting, funding, policies, use of ASU trademarks, and travel. The Student Organization Handbook is reviewed annually by the Student Organization Directors and approved by the Dean of Students from each campus before each academic year.

Student organizations are required to have Club Advisors, experienced faculty and staff members who formally mentor student leaders and connect students who share similar passions and interests through club experience. Club Advisors positively impact the overall well-being of the students they serve and play an active role in guiding students in their pursuit of leadership development, connecting students to resources. Student Engagement launched a new initiative for this academic year, the Enhanced Advisor Model, with updated qualification requirements and required training for advisors.

SunDevilSync is the online system used to register and approve student organizations and is utilized by registered student organizations to post information about their club such as the constitution and mission, submit funding requests with USG and GPSA, post events and news, and keep a roster of club members. All students can use SunDevilSync to search and explore approximately 1,000 student organizations at ASU.

Audit Objective: The objective of this engagement was focused on the design and operating effectiveness of operational, administrative, and financial controls related to student organizations and to ensure compliance with relevant ASU and ABOR policies. Specifically, the following areas were assessed:

- Assess compliance with student organization registration and re-registration requirements
- Ensure student organization officers and members meet the minimum defined requirements
- Verify fiscal controls are in place to ensure transactions are appropriate and valid
- Assess compliance to ASU and ABOR policies
- Assess Student Organization Staff and Faculty/Staff Advisor oversight of student organizations
- Identify opportunities for improvement

Scope: The scope of the audit focused on active student organizations and related controls during the period of June 2019 through December 2020.

The Student Engagement team implemented a new Enhanced Advisor Model for the 2020-2021 academic year, which introduced additional requirements for advisors. Due to the timing of implementing the new requirements, student organizations were given until September 2020 to replace advisors that did not meet the enhanced requirements. As of December 2020, testing indicated that 87 (10%) of club primary advisors did not meet one or more of the required criteria including role, years of service (faculty) or training or were terminated employees and 6 (4%) of club secondary advisors did not meet the suggested role requirement or were terminated employees. The Student Engagement team continues to work with the student organizations who have not met the enhanced advisor requirements; however, tracking of these efforts is manual and outside of SunDevilSync resulting in final actions such as freezing the organizations not being testable. For the 2021-2022 academic year, student organizations will not be approved at time of registration if advisors do not meet the requirements of the Enhanced Advisor Model.

It was also noted that student organization expenses are generally tracked through manual excel schedules managed by each of the campuses rather than defined accounts or worktags in Workday. As a result, reliance was made on the campuses manual tracking to identify expenditures related to student organizations included in the review. It is recommended that a standardize approach to tracking expenses, ideally within Workday, be implemented.

Methodology: The audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing promulgated by the Institute of Internal Auditors and accordingly consisted of tests of procedures necessary to provide a reasonable basis for expressing our opinion. Specifically, audit work consisted of interviews with the Student Engagement staff, observation of work processes, review of documented policies and procedures and substantive tests including the following areas:

- Performing a design assessment of the Student Organization Handbook 2020-2021 to ensure key requirements and policies are addressed
- Validating SunDevilSync logical access for privileged accounts by performing a high-level access review based on job title and department in addition to ensuring FERPA training requirements were met
- Verifying club constitutions include information regarding purpose, vision, mission, membership requirements, election of officers, club meeting procedures, and non-discrimination statements for a sample of 97 student organizations
- For the 97 student organizations tested, verifying the club's use of ASU trademarks in both their constitution and their logo adheres to ASU brand guidelines and the club's registered name adheres to naming guidelines
- Verifying student organization officer requirements and member requirements were met for a sample of 24 student organizations representing a total of 1,480 students
- For a sample of 850 student organizations, assessing the following areas:
  - Verifying that primary and secondary advisors meet the role requirement
  - Verifying that faculty who serve as primary advisors meet the years of ASU service requirement
  - Verifying that primary advisors have completed mandatory advisor training
  - Verifying that primary advisors have completed registration (Part 2) of student organization registration which includes verifying their position title and agreeing to be a primary advisor for the organization
- Verifying student organization expenditure transactions, including direct purchase, PCard, and travel transactions, had adequate documentation to support the transaction and was an allowable expenditure for a sample of 85 transactions totaling $136,422
- Verifying leadership opportunities were presented to student organization officers and members by reviewing a schedule of workshops offered over the past year as well as published newsletters

Conclusion: Overall, Student Engagement has developed an effective framework to guide student organizations to build upon and enrich the classroom experience. The published Student Organization Handbook includes guidance on student organization

registration, advisor requirements and best practices, student officer and membership requirements, club constitution requirements, and policies that are relevant to student organizations and members. While the design is effective, Student Engagement oversight requires further improvement to ensure the defined requirements are being followed. Testing identified issues in the areas of club constitutions, inappropriate system access related to SunDevilSync, and compliance with member requirements.

While Student Engagement staff does review and guide corrections to constitutions before clubs are approved, it was noted that 41 of the 97 (42%) constitutions tested did not meet one or more of the defined requirements. Specific exceptions noted included missing or incomplete non-discrimination statement, improper use of the ASU sunburst logo and improper use of Arizona State in conjunction with the club name.

Formal access provision processes have been implemented for Student Engagement Staff including periodic access reviews; however, the same process is not followed for student workers resulting in inappropriate privileged access. Testing identified seven student workers that had inappropriate access in addition to 13 that had not completed the required FERPA training. It was confirmed during the audit that all inappropriate access was removed.

Testing also identified that student organization rosters are generally not updated for students that leave ASU. Specifically, of the 1,480 students assessed, 365 (25%) were not current students. Maintaining the rosters is the responsibility of the Student Club Officers and is not reviewed by Student Engagement. While considered low risk, it is recommended that Student Engagement provide additional guidance regarding maintaining the rosters. Out of date rosters may negatively impact the ability to easily communicate with current members within the SunDevilSync tool as well as prevent accurate membership reporting.

The control standards University Audit considered during this audit and the status of the related control environment are provided in the following table.

General Control Standard (The bulleted items are internal control objectives that apply to the general control standards, and will differ for each audit.)	Control Environment	Finding No.	Page No.
Reliability and Integrity of Financial and Operational Information			
• Expenditures are allowable based ASU policies.	Reasonable to Strong Controls in Place	N/A	N/A

• Expenditures had adequate documentation to support the transaction and the use of student program fees.	Reasonable to Strong Controls in Place	N/A	N/A
Effectiveness and Efficiency of Operations			
• The Student Organization Handbook provides guidance on organization requirements, club registration, events and meetings, funding, ASU policies including travel, and ASU trademarks.	Reasonable to Strong Controls in Place	N/A	N/A
• Student organization constitutions meet all guidelines/requirements.	Opportunity for Improvement	1	7
• Student Officers meet the established requirements for officer positions.	Reasonable to Strong Controls in Place	N/A	N/A
Safeguarding of Assets			
• Access to SunDevilSync is appropriately restricted and granted only after FERPA training is complete.	Opportunity for Improvement	2	9
Compliance with Laws and Regulations	Not Applicable	N/A	N/A

We appreciate the assistance of Student Engagement representatives during the audit.

Lisa Grace, Executive Director, University Audit and Advisory Services
Andrea Idaszak, Senior Internal Auditor, University Audit and Advisory Services

Audit Results, Recommendations, and Responses

1. Student organization constitutions do not align with the defined requirements related to non-discrimination statement and use of Arizona State University in conjunction with the club name and related logos.

Condition: Student organization constitutions are being approved without all requirements being met including missing or incomplete non-discrimination statement, improper use of the ASU sunburst logo, and improper use of ASU in conjunction with club name within the constitution.

Criteria: The student organization guidelines require that a club's constitution include a non-discrimination statement, that all clubs follow ASU brand guidelines, and that student organizations use the geographical designation "at Arizona State University" or other variations at the end of their name (so as not to imply an official relationship with the University).

Cause: Student organization constitutions are uploaded into SunDevilSync for review as part of club registration. The existing review process is not effective to ensure all requirements are met prior to being approved.

Effect: Testing identified that of the 97 student organization constitutions assessed, 41 (42%) did not meet one or more of the defined requirements. Specific exceptions included the following:

- 8 (8%) did not have the required non-discrimination statement or it was incomplete
- 23 (24%) improperly utilized the ASU sunburst logo
- 9 (9%) improperly utilized Arizona State in conjunction with the club name
- Other isolated exceptions were noted in the areas of blank constitutions, membership open to online students and improper use of pitchfork without registered trademark symbol

Recommendation: A constitution template is available for student organizations to utilize and it is recommended that Student Engagement require clubs to use this template so that constitutions are more consistent in structure and content. This requirement would make the review process more efficient and ensure that this governing document is complete for use by the student organization and for students interested in joining clubs.

Management Response:

- *8 (8%) did not have the required non-discrimination statement or it was incomplete*

- o *Current Controls*: Student engagement staff has mitigated this item by contacting student organizations identified during the audit. A draft of the new template has been developed for student organizations. This is a critical component during our constitution review process. Student engagement staff work to ensure that all organizations include the non-discrimination statement. Staff work closely with groups that have expressed concern about the statement and meet with student leaders and advisors to educate on the importance of inclusivity. All student organizations are provided templates, access to trainings, and the information is reinforced in the Student Organization Handbook.

- o *Additional Controls*: Student engagement staff has contacted student organizations identified in this audit with full compliance completed by the end of February. Moving forward, a refreshed constitution template will be offered to student organizations and the non-discrimination statement is on a university-wide checklist for items to be reviewed when approving constitutions. This enhanced practice will be fully implemented during the student organization registration process beginning April 1st. In addition, we are working with the software provider to provide notifications of any changes to the constitution, membership or advisor throughout the course of the academic year.

- *23 (24%) improperly utilized the ASU sunburst logo*

  - o *Current Controls:* This control concern is a formatting issue that has been addressed by the student engagement team. A draft of the new template has been developed for student organizations. This point refers to the ASU sunburst logo being on the top of the first page of constitutions. The student engagement team has a well-established relationship with the Trademark and Licensing team and works collaboratively when student organizations attempt to print public-facing items, ensuring they meet brand standards. Joint meetings are held with student engagement, licensing, and student leaders to answer any questions and address any concerns. The proper use of the logos is also part of the training that student engagement offers. As a part of the registration process, student organizations are required to sign-off on their understanding of the ASU Brand Guide and Policies. All student organizations are provided templates, access to trainings, and the information is reinforced in the Student Organization Handbook.

  - o *Additional Controls*: Student engagement has taken immediate steps to rectify this concern. The Trademark and Licensing team has been contacted and will meet with the university-wide student engagement team in March 2021 and then on an annual basis prior to the student organization registration process, to ensure staff on all locations are well informed with the brand guidelines. Prior to the registration process beginning April 1, the refreshed constitution template will be provided to ensure that ASU brand requirements are reviewed as part of a university-wide checklist when approving constitutions. The template uses the approved Sparky logo for student organizations. In

partnership with Trademark and Licensing, the training presentation articulating brand guidelines has been updated and will be included in student organization and advisor trainings, beginning with the 2021-22 Advisor Training scheduled to launch on March 1st.

- *9 (9%) improperly utilized Arizona State in conjunction with the club name*

  o *Current Controls:* This generally refers to "at ASU" being at the end of student organization names. Any club intending to incorporate the ASU brand has been advised and agreed to this requirement. As a part of the registration process, staff confirms that the official name follows brand standards. There are some instances in which the official name is correct, but elsewhere in documents it is written incorrectly. All student organizations are provided templates, access to trainings, and the information is reinforced in the Student Organization Handbook.

  o *Additional Controls*: A draft of the new constitution template has been developed for student organizations to ensure the proper use of "at ASU." For the upcoming student organization registration process, scheduled to begin on April 1st, checking for compliance is now included on a university-wide checklist for items to be reviewed when approving constitutions. Additionally, the student engagement staff continues to work with advisors to ensure that all other related materials reflect the name properly during registration and beyond. This is a part of the 2021-22 Advisor Training scheduled to launch on March 1st.

2. Logical access to SunDevilSync is not appropriately restricted as it relates to student workers.

Condition: Administrator access to SunDevilSync is not being removed when students are terminated and is granted to students who have not completed FERPA training which is a requirement for system access.

Criteria: Administrator access should be removed when no longer required and only be granted to those who have completed FERPA training as a requirement for access.

Cause: Student access to SunDevilSync is handled on a local campus basis. The respective supervisor is expected to remove student access upon completion of their employment and to notify the Director of Student Engagement to update the access tracking log; however, this process is not consistently followed and existing periodic reviews did not include student workers. In addition, verification processes were not in place to confirm student workers completed FERPA training prior to access being granted.

Effect: Access was not revoked for seven student workers who were no longer employed by ASU and access was granted to 13 ASASU students who had not completed FERPA training resulting in inappropriate access.

Recommendation: The existing process that Student Engagement implemented for staff access should be applied to student worker access, including the quarterly access review. In addition, processes should be implemented to ensure FERPA training is complete for all privileged access prior to granting access.

Management Response:

- *Current Controls:* This item was immediately addressed during the audit process with all unauthorized access immediately revoked. A robust set of standard operating procedures is in place for weekly and quarterly access control for staff. This process is vetted annually and approved by UTO/EOSS Technology. It is important to note that the students identified did not have full access to SunDevilSync, but limited access specific to their job function.

- *Additional Controls:* Effective immediately, student engagement staff on each campus are responsible for updating student access as it relates to the SOP. Moving forward, student employees are required to complete a dashboard of trainings to include FERPA training in order to gain administrative access to SunDevilSync. Any student without FERPA training will have their administrative access removed.

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