Summary: The Study Abroad Program audit was included in the Arizona State University (ASU) FY 2020 audit plan approved by the Arizona Board of Regents (ABOR) Audit Committee and ASU senior leadership. The audit focused on the design and operating effectiveness of controls around program administration, program fees and expenses, and related safety and travel oversight. This audit is in support of ASU’s mission of student success.

Background: The ASU Study Abroad Office (SAO) provides students with the opportunity to engage in an international learning experience during their time at the University focused on academic, personal and professional growth. During FY 2019, SAO offered approximately 285 different study abroad programs in a variety of fields and across the seven continents. ASU recently ranked 9th in the annual Institute of International Education Open Doors 2019 report for sending 2,567 students on credit-bearing study abroad programs. Students have the option to attend four different types of programs:

<table>
<thead>
<tr>
<th>Shorter Term Programs</th>
<th>Longer Term Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Faculty-Directed Programs:</strong> Faculty-Directed program courses are created and taught primarily by ASU faculty. Offered primarily during the summer sessions, each faculty-directed program focuses on a certain academic discipline with students earning direct ASU course credit, and incorporates excursions and field trips to give students the opportunity to explore and learn about their host country. University, major, elective and internship credit may be earned through participation in a faculty-directed program.</td>
<td></td>
</tr>
<tr>
<td><strong>Exchange Programs:</strong> Exchange program participants enroll in the program courses at the host institution, and then receive ASU credit after completion of the exchange program. University, major, elective, service-learning, internship, and individualized instruction credit may be earned through participation in an exchange program.</td>
<td></td>
</tr>
<tr>
<td><strong>Global Intensive Experiences:</strong> Global Intensive Experiences are embedded as part of a semester course at ASU, or added on at the beginning or end of a session A, B, or C course. Participants are taught by ASU faculty and in class with other ASU students. This intense, immersive study abroad model connects students to experiences and cultures abroad that are integrated with for-credit ASU academic courses. Each Global Intensive Experience generally ranges from seven to twelve days in length.</td>
<td></td>
</tr>
<tr>
<td><strong>Partnership Programs:</strong> Partnership program participants enroll in the program courses at the host institution, and then receive ASU credit after completion of the partnership program. University, major, elective, service-learning, internship, and individualized instruction credit may be earned through participation in a partnership program. Though some partnership programs will have a limited academic focus, most programs offer a wide variety of courses for students in many different majors.</td>
<td></td>
</tr>
</tbody>
</table>

SAO manages all aspects of the Study Abroad program including program proposals and selections, program risk assessments, third party/vendor selection and contracting, student orientations and faculty training, insurance tracking, fiscal management and oversight, onsite support, incident response management, and post program evaluations. As part of the program, SOA has also established a Study Abroad Health and Safety Committee to review and approve the risk assessments of programs with a high-risk
component, assist with incident management when appropriate, and provide support and recommendations to SAO for various safety and travel issues.

SOA utilizes a third party, Terra Dotta, to host the application StudioAbroad, to facilitate the Study Abroad program. Once approved, programs are set up in StudioAbroad where most aspects of the program are managed including program information and requirements, student applications, disclosure forms, required training, insurance requirements, and health and safety resources and travel notifications.

SOA reviews all student applications to ensure students meet the program requirements and are in good academic standing with the University before being accepted. Once accepted, students are required to complete pre-departure online orientations developed for each type of program, which include information about health and safety, travel and logistics, academics, cultural aspects of study abroad, finances, and other matters to help prepare for a successful experience abroad. While abroad, students are registered in the AlertTraveler (a module of StudioAbroad) to receive real-time notifications of world events occurring at their locations.

Before leading a Faculty-Directed or GIE program, ASU faculty and staff are required to complete training and various disclosures and acknowledgments to ensure they understand their responsibilities for the program and the health and safety of the students.

Audit Objective: The scope of the audit focused on assessing controls around program administration, program fees and expenses, and related safety and travel oversight. Specifically, the following areas were assessed:

- Verify program proposals have appropriate approvals and are supported by vendor/third party contacts where relevant
- Ensure students complete the application process and required orientations for participation in a study abroad program
- Ensure program leaders complete required disclosures and acknowledgements, and training before leading a study abroad program
- Assess the adequacy of the processes and procedures related to safety and travel oversight
- Ensure appropriate fiscal controls are in place governing program budgets and related revenue and expenses
- Identify opportunities for improvement

Scope: The scope of the audit focused on programs that occurred during the 2018-2019 academic year and the subsequent summer. During the audit we determined that AlertTraveler, which generates automatic notification to travelers, may not be functioning
as intended. SOA is working with the third party vendor to determine if the issues are related to reporting only or if the system is not functioning as intended resulting in travelers not receiving the notifications. This was still in process at the time of this audit report and therefore could not be assessed.

In addition, program documentation including proposal packets, approvals, risk assessments and the confirmation of the insurance coverage provided by the partners were not retained for the Exchange and Partner programs. These programs are generally long standing programs with minimal changes resulting in the programs being low risk; however, due to the lack of documentation, these programs could not be tested for these items.

Methodology: Our audit consisted of tests and procedures necessary to provide a reasonable basis for expressing our opinion. Specifically, audit work consisted of interviewing the leadership and staff of the Study Abroad Office, observation of work processes, review of documented policies and procedures, and substantive tests including the following areas:

- Confirming program proposals were complete and approved for a sample of 15 Exchange and Partnership programs
- Confirming program proposals and related budgets were complete and approved for a sample of 25 Faculty-Directed and GIE programs
- Confirming risk assessments were complete for the 40 programs selected for testing and ensuring programs identified with high-risk locations or activities were approved by the Study Abroad Health and Safety Committee
- Confirming third party contracts are current and follow the OGC template including current terms and conditions for the 40 programs selected for testing
- Assessing the mandatory student pre-departure online orientations for each type of program to ensure orientations address key areas including health & safety, travel & logistics, academics, cultural aspects and finances
- Assessing the content of the emergency response preparedness and response seminar, operating procedures and response guide to ensure adequate guidance has been provided to the program leaders
- For the 40 programs selected for testing, selected 20% of the students (124 students) and assessing the following areas:
  - Verifying each student completed their applications by examining the required forms and tasks specific for their programs in StudioAbroad
  - Verifying each student completed the pre-departure online orientation associated with their program by reviewing training records in Blackboard and Canvas
Confirming each student was insured during the program by examining the GeoBlue insurance records

For the 25 Faculty-Directed and GIE programs selected for testing, assessing the following areas:

- Verifying each program leader completed the required disclosures and acknowledgements in StudioAbroad for their programs
- Verifying each program leader completed the required training by confirming the training dates in StudioAbroad
- Confirming each program leader (and family members traveling with program leaders where relevant) was insured during the program by examining the GeoBlue insurance records

- Assessing the completeness of incident tracking reporting through reviewing incidents reported during the time period of January 2018 to July 2019
- Confirming the selected study abroad programs were evaluated by the student participants by examining the evaluations and, for the selected Faculty-Directed and GIE programs, the summaries provided to the academic units
- Assessing the appropriateness of StudioAbroad privileged access
- Assessing SAO oversight of Terra Dotta compliance to the defined security provisions included in the contract
- Assessing accuracy and appropriateness of program fees and expenses by:
  - Comparing the fall 2018 and spring 2019 semester reconciliation spreadsheets for the Exchange and Partnership programs to the transactions in the financial management system for the 15 programs selected for testing
  - Comparing the initial budgets to the actuals on the reconciliation spreadsheets, confirming the students to the rosters from StudioAbroad and tracing the transactions in the financial management system for the 25 Faculty-Directed and GIE programs selected for testing
  - Verifying program fees recorded to the financial management system to StudioAbroad for the selected programs
  - Reviewing appropriateness and accuracy of payments to partners and service providers, and a sample of 50 expense reimbursements to program leaders for the selected programs

**Conclusion:** Overall, the Study Abroad Office has implemented adequate processes and controls to ensure that study abroad programs are managed effectively and program participants are provided with the training and resources necessary to mitigate risks while abroad. The office has a thorough review process for proposals including several levels of review and approvals of the programs, leaders and budgets, and a risk assessment by SAO and the Study Abroad Health and Safety Committee for high-risk programs. There
are dedicated International Coordinators who provide training to program leaders and orientations to students to ensure they are informed and prepared for various aspects of traveling abroad, and support the leaders and students in completing required documents. Additionally, the financial group assists the leaders in developing program pricing, contracting, and managing the finances of the programs. SAO has also implemented an effective framework for mitigating safety risks and responding to incidents that occur abroad.

While existing processes are robust, testing indicated that core documentation supporting the processes is not consistently maintained and at times SAO requirements not being actioned. This is primarily due to existing processes utilizing standard Microsoft Office products such as email for approvals, and defined documentation and retention processes not being implemented. It was also noted that three contracts with other institutions/partners had not been renewed or extended even though students were participating in the programs, increasing the risks that agreed to terms and conditions are not fulfilled. Based on the volume of programs being managed, it is recommended that SAO implement a workflow tool or system to streamline the administrative functions to ensure existing processes remain scaleable as demand increases.

In addition, further enhancement of oversight processes to ensure both program leaders and students have met the requirements for the programs prior to traveling abroad is needed. Testing indicated that required documents, and training and orientations are not always completed by faculty and students, increasing risks to the success of the programs.

Logical access related to the StudioAbroad system was not appropriately restricted. StudioAbroad contains sensitive data as well as FERPA protected data. While the application primarily utilizes single sign-on, a formal de-provisioning process has not been implemented resulting in 19% of users being inappropriate. In addition, necessary vendor oversight of the Terra Dotta agreement has not been implemented to ensure required SOC2 and security scans are collected and reviewed.

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

<table>
<thead>
<tr>
<th>General Control Standard</th>
<th>Control Environment</th>
<th>Finding No.</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reliability and Integrity of Financial and Operational Information</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Contractual Agreements

Contractual agreements govern exchange institutions, partners, and service providers involved in the Study Abroad program.

| Opportunity for Improvement | 1 | 9 |

### Revenue and Expenses

Revenue and expenses for Faculty-Directed and GIE programs are tracked and reconciled with the Financial Management System in a timely and complete manner.

| Opportunity for Improvement | 8 | 16 |

### Revenue and Expenses for Exchange Programs

Revenue for Exchange programs and revenue and expenses for Partnership programs are reconciled with the Financial Management System in a timely and complete manner.

| Reasonable to Strong Controls in Place | N/A | N/A |

### Payments to Partners and Service Providers

Payments to partners and service providers are accurate and in accordance with defined contractual provisions.

| Reasonable to Strong Controls in Place | N/A | N/A |

### Payments to Program Leaders

Payments to program leaders for expense reimbursements are accurate and appropriate.

| Reasonable to Strong Controls in Place | N/A | N/A |

### Effectiveness and Efficiency of Operations

#### Proposals and Budgets

Proposals and budgets for Faculty-Directed and GIE programs are complete, reviewed for appropriateness of program leaders, and approved by the academic units and Provost.

| Reasonable to Strong Controls in Place | N/A | N/A |

#### Risk Assessments

Risk assessments are completed for study abroad programs during the proposal process and actions are completed.

| Opportunity for Improvement | 2 | 9 |

#### High-Risk Programs

Programs identified as high-risk are reviewed and approved by SAO and the Study Abroad Health and Safety Committee.

| Reasonable to Strong Controls in Place | N/A | N/A |

#### Program Leaders

Program leaders complete the disclosures and acknowledgements, and training for the study abroad programs according to defined requirements.

| Opportunity for Improvement | 4 | 11 |

#### Student Participation

Students complete required forms and tasks of their applications, and the required pre-departure online orientations before participating in the study abroad programs.

| Opportunity for Improvement | 3 | 11 |

#### Program Evaluations

Program evaluations completed by students are reviewed by the Study Abroad Office and academic units were applicable.

| Reasonable to Strong Controls in Place | N/A | N/A |

#### Reported Incidents

Reported incidents are tracked in a timely and effective manner and are utilized to focus on continuous improvement of the overall program.

| Opportunity for Improvement | 7 | 15 |

### Safeguarding of Assets

Program participants, including program leaders and students are covered by University or partnership contracted insurance while traveling abroad.

| Reasonable to Strong Controls in Place | N/A | N/A |
| • The Study Abroad Office has adequate emergency preparedness and response procedures for the study abroad programs and leaders. | Reasonable to Strong Controls in Place | N/A | N/A |
| • Logical access to the departmental application is appropriately restricted. | Opportunity for Improvement | 5 | 13 |
| • Password requirements and complexity configurations meet the defined information Security Policy. | Reasonable to Strong Controls in Place | N/A | N/A |
| • Third party vendor management oversight is implemented to ensure compliance with defined security provisions. | Opportunity for Improvement | 6 | 14 |

**Compliance with Laws and Regulations** | Not Applicable |

We appreciate the assistance of the staff of the Study Abroad Office during the audit.

Lisa Grace, Executive Director, University Audit and Advisory Services
Sadie Petterson, Assistant Director, University Audit and Advisory Services
Audit Results, Recommendations, and Responses

1. Contracts for the Exchange and Partnership programs have not been renewed timely.

**Condition:** Contracts for 3 (20%) of the 15 Exchange and Partnership programs tested were expired; however, students continued to participate in the programs. One contract was renewed during the audit after being expired for more than a year. The other two remain in process.

**Criteria:** Contracts with other institutions and partners should be renewed timely or extended to ensure the terms and conditions are understood and the study abroad programs are managed accordingly.

**Cause:** The Study Abroad Office begins the renewal process five to six months before the contracts expire, but the lead-time has not been sufficient due to the manual nature of executing the contracts and in some instances, the length of time negotiations have taken.

**Effect:** The students and University may be at risk when study abroad programs are conducted without a contract that governs the terms and conditions of the relationship.

**Recommendation:** The Study Abroad Office should review the existing contracts and work with OGC to determine appropriate lead-times for completing the renewals.

**Management Response:** Inclusions of GDPR related statutes necessitated by changes to European law in May 2018 have resulted in lengthy renewal timelines due to the involvement of legal counsel from both ASU and the foreign institutions. In August 2019, OGC approved our use of a much shorter amendment template for expiring agreements, which extends the terms of the original agreement rather than executing an entirely new agreement. The amendment template includes a section for new inclusions/changes so it may not expedite renewals for changes to legal terms, but it should allow us to move agreements forward much faster in cases where no changes or operational changes are necessary. Finally, the addition of MoveOn software at ASU in 2020 should also allow additional transparency and accuracy in tracking agreements with our partner institutions and their expiration dates. Implementation is planned to be complete by December 2020.

2. Procedures are not in place to ensure additional requirements imposed as part of the program risk assessment are tracked and completed prior to trip departure.
**Condition:** All programs are required to go through a formal risk assessment process, which may result in the program being approved only with additional disclosures, training or other risk mitigating processes being performed; however, there is no formal tracking to ensure the additional requirements are completed.

**Criteria:** Risk assessments are performed by SAO to identify actions that mitigate risks to program leaders and students while traveling abroad, and to the University in conducting the study abroad programs.

**Cause:** Risk assessments are performed during the proposal process but the timeline for implementing study abroad programs can be between 12 to 18 months. Formal tracking and monitoring of requirements identified through the risk assessment process have not been implemented resulting in the additional requirements being omitted in error.

**Effect:** Faculty and students participating in study abroad programs may not have a full understanding of the risks associated with the study abroad program negatively impacting the student experience of the program. Testing identified exceptions in 36% (9 of the 25) of the Faculty-Directed or GIE programs:

- One program did not have a risk assessment performed in error
- Three programs were identified as high-risk programs, which require the student to complete an Acknowledgement of Safety Security Risk(s) form; however, the form was not added for students in StudioAbroad in error or was added late resulting in students not completing the required form
- Five programs were approved with additional training being required for the program leaders; however, the program leaders did not complete the training

**Recommendation:** Formalized tracking and monitoring of required actions identified as part of the risk assessment process should be implemented to ensure programs are set up appropriately in StudioAbroad and all required actions have been completed.

As previously noted, program administrative functions (proposals, budgets, approvals and the risk assessment process) are managed manually outside of the existing StudioAbroad system. Based on the volume of programs being managed, it is recommended that SAO implement a workflow tool or system to streamline the administrative functions to ensure existing processes remain scaleable as demand continues to increase.

**Management Response:** Spreadsheets for each term will be implemented to track and monitor required actions identified in the risk assessment process for each program. Staff will be required to initial and date to indicate completion of each specific action. Actions
may include: the addition of specific items to the student application (e.g. Acknowledgement of Safety Security Risk(s) form), individual faculty training completion, and information to be conveyed by faculty during pre-departure orientation sessions.

The SAO agrees that StudioAbroad does not provide the functionality to track program implementation and operations. There are two workflow tools that are coming online at ASU in 2020; MoveOn and an online Curriculum Management system. Both of these tools are currently being assessed as potential workflow tools through which to manage the study abroad program proposal and implementation process. Upon selection of one of these tools, specific forms, tracking and workflows will be developed to handle both faculty-directed programs and partnership/exchange program implementation.

Spreadsheet tracking will be implemented immediately. Further enhancements with the online workflow tools are slated for implementation at the University level in 2020 and these specific workflows may be ready for use by the Study Abroad Office mid-2021.

3. Existing oversight controls do not ensure that students participating in the study abroad programs complete the required pre-departure online orientations.

Condition: Procedures are not effective in ensuring that students complete the required pre-departure online orientations. Of the students tested, 15% did not complete the orientations for their study abroad programs.

Criteria: The pre-departure online orientations are important for students to be prepared for traveling abroad in their programs. The orientations address academic and financial aspects of the programs, as well as cultural, health and safety, and travel and logistics issues that students should be aware of while traveling.

Cause: Students are informed that they must complete a pre-departure online orientation and acknowledge the requirement in their application document; however, the Study Abroad Office does not prevent students from participating if they do not complete the orientations because of the financial implications to the students and potentially financial impact to the programs.

Effect: If students do not complete the orientations for their programs, there is an increased risk that they are not properly informed and prepared for travel abroad, which could also affect the experience of other students.

Recommendation: The Study Abroad Office should ensure that students complete the required pre-departure online orientations by improving the oversight by the International
Coordinators or requiring the orientations to be completed before students are accepted into the program.

Management Response: Best practices within the field of International Education are that students should complete a pre-departure orientation(s) specific to their term and program of choice between program acceptance and departure. At ASU, students receive a pre-departure orientation provided by the SAO and an onsite orientation specific to their program.

During the time-period the audit tested completion of the pre-departure orientation, there were several anomalies that negatively affected completion rates, including challenges moving from Blackboard to Canvas. We are comfortable with the process as it currently stands (which is outside the testing period) and the additional controls listed below will only serve to further increase completion rates.

In order to both ensure every student participating in any program has the pre-departure orientation task assigned to their account and an increased completion rates, the SAO will explore the following possible business practices intended to increase student participation in the pre-departure orientations for students in all program types including:

1. Establish a messaging timeline to ensure students participating in all program types are receiving appropriate reminder messaging to complete the task (with SAO Student Orientation and Re-entry Team).
2. Implement a schedule for SAO student staff to follow up with students who have yet to complete the pre-departure Orientation via phone or email.
3. Explore the possibility of implementing reminders on My ASU (with UTO).
4. Work with Faculty Directors to include a text in the course syllabus emphasizing the importance of the required pre-departure orientation.

Planned actions are being implemented immediately with full implementation in place by June 2020.

4. Existing oversight controls do not ensure that program leaders have completed required disclosures/acknowledgments or the training required for their programs.

Condition: Controls are not effective in ensuring that faculty and staff who lead the Faculty-Directed and GIE programs have completed the required disclosures and acknowledgments or the training required for their program. StudioAbroad is configured
to track these items; however, controls have not been implemented to enforce requirements.

- 43% (22 of 51) of program leaders did not complete one or more of the required forms, primarily the emergency contact or the contact information while abroad but also the Study Abroad Disclosure form
- 49% (24 of 49) of the program leaders tested did not complete the required orientation for new leaders
- 27% (13 of 49) new program leaders did not complete emergency preparedness and response seminar
- 80% (39 of 49) of the program leaders tested did not complete the two additional training sessions as required

Criteria: Before leading a program, faculty and staff must complete specific forms to ensure they are fully aware of their responsibilities for the program, disclose conflicts of interest, identify family members who may travel with the leader, and provide emergency contact information during the program. Faculty and staff are also required to complete specific training to ensure they are prepared to address incidents or emergencies while traveling abroad. Both the forms and training required of program leaders mitigate risks for the leaders as well as the students and University.

Cause: SAO staff does not consistently review the risk management records of faculty and staff in StudioAbroad for completion prior to the program starting. In some instances, such as contact information, information may not be known until the faculty or staff is at their destination, however once known, information is not consistently updated into StudioAbroad.

SAO staff enters training completion dates into StudioAbroad from attendance records; however, completion is not consistently monitored. Training sessions are emailed to program leaders if they are not able to attend the in-person training to mitigate the risk of faculty and staff not having necessary information; however, this is not formally tracked nor is it known if the faculty or staff member reviewed provided materials.

Effect: If program leaders do not complete the disclosures and acknowledgments or training for their programs, there is an increased risk that the Study Abroad Office does not have information that is critical to the success or safety of the program. Additionally, if program leaders do not complete the required training, there is an increased risk that they are not prepared to address incidents or emergencies that occur during the program.

Recommendation: The Study Abroad Office should improve procedures to ensure that program leaders complete the disclosures and acknowledgments, and training required
for the programs. Procedures should include a review of the risk management records, especially when there is a change in the leaders, and follow-up with the leaders if contact information is not available until they are at their destination. Where feasible, automated notifications should be turned on in StudioAbroad to notify faculty and staff of outstanding requirements.

Additionally, procedures should be put into place to ensure training is current for leaders before leading subsequent programs.

**Management Response:** The current training requirements are not clearly enforced. To promote clarity, facilitate tracking, and provide additional training, the SAO proposes the following changes:

1. Require the Emergency Response & Preparedness (EPR) seminar every other year plus one additional training workshop each year.
2. Explore ASU best practices for electronically tracking attendance at in-person events (e.g. online check in, ASU Mobile App, Eventbrite, Aventri, etc.) to reduce the reliance on manual processing in entering in training sign-in sheets (with UTO help).
3. Develop online EPR training for those who are unable to attend in-person. Work with Instructional Designer to maintain quality and learning facilitated through small group sessions and case study discussions as we move the content into the online environment (with EdPlus Instructional Designer help).
4. Explore moving training workshops into ASU Career Edge in order to facilitate online training and tracking (with UTO help).
5. Develop report to concatenate completion data on trainings into one report (Title IX, Intersections, ASU Safe Driver, EPR, new FD Orientation and additional trainings) to reduce reliance on manual reporting and human data entry (with UTO help).
6. Create tasks in StudioAbroad for required trainings.
7. Set up reminders for required trainings and onsite data collection (e.g. the emergency contact or the contact information while abroad).
8. Explore establishing consequences (for example delayed or reduced distribution of per diem) for faculty failing to comply with the completion of all training requirements and onsite data collection.

Items 1, 6, and 7 can be implemented immediately; all other items require significant additional resources outside the Study Abroad Office and will be implemented by December 2020.
5. Access to the StudioAbroad application is not appropriately restricted.

Condition: Logical access to the StudioAbroad application is managed through the Study Abroad Office; however, formal access management processes have not been implemented resulting in inappropriate privileged access and end user access not being removed when individuals are terminated.

Criteria: System access should be reviewed in a timely manner when employees leave the University or transfer to a different role where access is no longer required.

Cause: Access management processes have not been implemented to identify when employees are terminated or transfer to a new role. In addition, periodic access reviews have not been implemented.

Effect: Access was not appropriately restricted resulting in inappropriate access to sensitive information including data protected by FERPA. Specifically, 20% of the users were inappropriate as they are no longer active ASU employees or in roles where access is no longer required. In addition, one generic account was noted that was no longer needed and one administrator account was noted that was not appropriate.

Recommendation: A full access review should be performed to ensure all access is appropriate. Testing did not constitute a full access review so additional incidents of inappropriate access may exist. In addition, the Study Abroad Office should utilize the existing reports that are generated daily through the Identity and Access Management team related to terminations and transfers to ensure access is being removed in a timely manner. Periodic access reviews should also be performed at least annually.

Management Response: A full access review for Studio Abroad will be completed in January 2020. Inappropriate access will be removed.

UTO’s Deputy Chief Information Officer has been contacted regarding the addition of the SAO to the daily email regarding access changes to address inappropriate access for faculty and staff who no longer work at the University or have had a position change. Once this takes place, inappropriate access can be monitored daily and revoked as necessary.

Additionally, a census date will be determined by term, at which point all faculty leaders leading active programs will be reviewed. Inactive faculty will be removed from programs.

MoveOn will be assessed as an appropriate workflow program through which to provide reminders of annual security review timelines.
6. The Study Abroad Office has not implemented appropriate vendor management processes over StudioAbroad to ensure compliance with required security provisions.

**Condition:** The Study Abroad Office has not implemented adequate third party oversight monitoring processes of Terra Dotta to ensure they are compliant with the required security provisions of the contract.

**Criteria:** Contractually, Terra Dotta is required to provide a SOC 1 review or the equivalent at least annually. The application is hosted in a third party data center, which offers a SOC report addressing physical security; however, they do not currently offer a SOC report over the application itself. The Study Abroad Office was not collecting the SOC report related to physical security nor the required vulnerability/penetration scan due to the lack of SOC reporting of the application. The Study Abroad Office, as the vendor owner, is responsible for monitoring Terra Dotta to ensure security provisions are met.

**Cause:** The Study Abroad Office was not aware that they were responsible for this oversight and therefore, had not implemented oversight processes to ensure Terra Dotta is compliant with defined security provisions.

**Effect:** The Study Abroad Office does not have adequate visibility into Terra Dotta’s security environment to ensure contractual provisions are met.

**Recommendation:** The Study Abroad Office should implement formal procedures to monitor Terra Dotta’s compliance with security provisions. This should include reviewing the annual SOC 1 report to ensure no material risks exist within the physical data center, as well as collecting the required security scans as required by the vulnerability management security standard.

**Management Response:** UTO’s Deputy Chief Information Officer has been contacted regarding this recommendation and how UTO might assist us in conducting the appropriate security review. Necessary actions will be implemented by July 2020.

MoveOn will be assessed as an appropriate workflow program through which to provide reminders of annual security review timelines.

7. The Incident Report database is not updated timely and requires improvements to ensure incidents are captured completely and accurately.
**Condition:** The Study Abroad Office has developed an Incident Report database to track relevant information about incidents reported by program leaders; however, the database is not updated timely nor are all incidents added in a complete and consistent manner. Specifically, a review of the database identified the following:

- Incomplete information and blank fields
- Multiple records for the same incident when there is more than ASU participant involved (duplicate records)
- No dedicated resolution field
- No significance rating to distinguish non-emergency, emergency, or case incidents

**Criteria:** The Incident Report database should be updated timely and capture incidents in their entirety to give visibility to recurring issues and to facilitate reporting and analysis for process improvement.

**Cause:** The Incident Report database is updated manually from emails, phone calls and reports submitted in StudioAbroad as time allows. Sometimes full circumstances are not known or reported, or follow-up actions are still in process that prevent complete information for being obtained. Additionally, debriefings are not performed with leaders when they return from a program.

**Effect:** The Study Abroad Office may not have adequate visibility to incidents nor is there analysis performed to identify potential process issues to consider in future programs.

**Recommendation:** The Study Abroad Office should implement procedures to ensure the Incident Report database is updated timely and incidents are captured completely and accurately. A dedicated resolution field and significance rating should be added to isolate the outcomes and identify the more impactful incidents for further review and process improvement opportunities. Additionally, debriefings should be performed for at least the more significant incidents when leaders return from a program.

**Management Response:** The SAO Health & Safety team has recently seen the addition of an International Health, Safety & Security Specialist. With this expanded resource, the SAO Health & Safety team will:

1. Conduct research into best practices in International Education for documenting incidents while maintaining student confidentiality and appropriate separation of incident data from student personal and academic records.
2. Develop procedures so that the existing database is updated both more thoroughly and timely, including the addition of a resolution field and significance field.
3. Develop process for documenting resolution, measuring impact and significance of individual incidents appropriately.

4. Develop and implement templates for review and debrief of impactful incidents related to process improvement opportunities.

5. Conduct post-incident debrief sessions with appropriate SAO, faculty and ASU partner resources to review documentation of incidents within defined severity threshold (to be determined re: impact and significance), identify and implement process improvements and develop appropriate case study documentation.

6. Explore the possibility of existing ASU data management resources through which to document incidents.

Remediation actions will be complete by December 2020.

8. Reconciliations of the Faculty-Directed and GIE programs to WorkDay are not completed timely and require improvement to ensure revenues and expenses are accurately recorded.

**Condition:** To reconcile the revenues and expenses of the Faculty-Directed and GIE programs, the Study Abroad Office uses the internal budget spreadsheets, updated with actuals which are then verified to WorkDay to determine the ending net balance; however, the reconciliations have not been completed timely to ensure the financial activity of the programs is accurate. Specifically, testing identified the following:

- Different versions of the reconciliation spreadsheet and inconsistent use of check totals
- Incorrect program dates and changes not updated throughout the tabs within the reconciliation workbooks
- Revenue and internal expense transfers not recorded to the Program within WorkDay
- Expenses recorded to the wrong Program in WorkDay
- Delayed reimbursements of expenses to faculty and staff

**Criteria:** The reconciliations of the Faculty-Directed and GIE programs should be completed timely to ensure there is a clear cutoff between the program occurrences, and financial activity is recorded in the appropriate fiscal year.

**Cause:** The existing process is Excel based and is designed appropriately; however, the combination of the WorkDay implementation along with personnel changes within SAO resulted in reconciliations not being done timely or consistently.
**Effect:** If reconciliations are not completed timely, financial activity that is missing, inappropriate or not recorded accurately may not be identified, thereby impacting the ability to ensure future program pricing is appropriate.

**Recommendation:** The Study Abroad Office should establish timelines for reimbursing expenses and completing the reconciliations based on the semester of the program. Additionally, one template of the reconciliation spreadsheet should be used with locked cells for check totals and instructions for balancing between tabs and WorkDay, and all revenues, expenses and transfers should be recorded to the Department Reporting Roll for the program.

**Management Response:** Since receiving this report, the SAO Business Office has documented formal reconciliation instructions and timeline expectations. These instructions include dates for each cycle by which programs should be fully reconciled. Reconciliation will include verifying that all revenue and expenses have been posted to the correct Program and Department Reporting Roll (DRR). Transfers out will include the DRR for the program. Even and odd year worktags will be used to identify the correct cycle/year of the program. In addition, the team is currently working to ensure all program budgets are uniform and include the most recent updates, including a box at the top of the active budget tab that shows when and by whom the reconciliation was completed. Remediation actions will be complete by July 2020.
Distribution:

Arizona Board of Regents Audit Committee
Michael M. Crow, President
Morgan R. Olsen, Executive Vice President, Treasurer and Chief Financial Officer
Mark Searle, Executive Vice President and University Provost
Sheila Ainalay, Vice Provost for Planning and Budget
Frederick Corey, Vice Provost for Undergraduate Education
Jennifer Malerich, Executive Director, Academic and Global Engagement
Internal Audit Review Board