



AUDIT AND ADVISORY SERVICES  
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February 20, 2025

To: Alan Grosenheider, Interim Librarian  
Lidia Uziel, Associate University Librarian for Research Resources and Scholarly  
Communication

Re: **University Library Special Research Collections – Physical Security  
Audit Report No. 08-25-0004**

We have completed a limited review of the University Library's internal controls as part of the 2024-25 annual audit services plan. The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*. The report detailing the results of our work is enclosed.

We sincerely appreciate the cooperation and assistance the University Library and Information Technology Services (ITS) personnel provided during the review. If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley Andersen", is written over a light blue horizontal line.

Ashley Andersen  
Director  
Audit and Advisory Services

Enclosure

cc: Chancellor Henry Yang  
David Marshall, Executive Vice Chancellor  
Chuck Haines, Vice Chancellor, Chief Financial Officer  
UCSB Audit Committee  
Christian Villaseñor, Assistant Vice Chancellor for Academic Affairs  
Alexander Bustamante, Senior Vice President and Chief Compliance and Audit Officer

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UC **SANTA BARBARA**  
Audit & Advisory Services

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Audit Report

University Library Special Research Collections –  
Physical Security

February 20, 2025

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**Performed by:**

Antonio Mañas Meléndez, Associate Audit Director  
Irene Camargo, Senior Auditor

**Approved by:**

Ashley Andersen, Audit Director

Report No. 08-25-0004

## EXECUTIVE SUMMARY

### OBJECTIVE

The audit aimed to assess the efficiency and effectiveness of the internal controls for the Special Research Collections at the University Library (Library), ensuring the integrity of the Special Research Collections (SRC) and compliance with University of California (UC) policies. The main objectives were to determine whether:

- The Library has documented procedures to handle special research collections, including recommended internal controls in the acquisition<sup>1</sup>, processing<sup>2</sup>, transferring, and deaccessioning<sup>3</sup> of special research collections.
- The Library has implemented checks and balances aligned with best practices, including the separation of duties model, to ensure the integrity of handling special research collections. This includes whether computer system profiles and privileges follow the least privilege principle, as required by UC Policy IS-3: Electronic Information Security.
- The Library officially records and reports gifts-in-kind<sup>4</sup> acceptance aligned with the UC Development Reference Guide and reports to the University of California Santa Barbara (UCSB) Gift Administration Office to record gifts donated to the UC Regents.
- The Library performs economic assessments of all special research collections and determines whether additional safeguards are needed for high-value items, such as material transfers, prioritizing digitization, and proper insurance coverage.
- The deaccessioning process for partial or complete special research collections complies with UC BUS-38 Disposition of Excess Property and Transfer of University-Owned Property and the UC Development Reference Guide regarding the sale or other disposition of donated property.
- The Library has documented a physical security plan and internal controls aligned with the University of California Santa Barbara (UCSB) Physical Access Control Policy. This includes adequate security infrastructures, a formal authorization process to grant and monitor physical access, and periodic evaluations of security measures.
- There is a formal process for requesting and granting access to SRC's inventory systems. Adequate controls monitor access and activity in these systems, focusing on modifying special research collections inventory records.
- Roles and responsibilities are adequately defined to ensure computer systems are fully configured, operational, and supported by personnel with technical knowledge to assess the quality of the service (availability, backup, updates, vulnerabilities, etc.) and configure critical elements so that systems are working as intended.

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<sup>1</sup> The process of selecting, ordering, and receiving materials for library or archival collections by purchase or gift.

<sup>2</sup> The formal process of accepting material into the archives.

<sup>3</sup> The formal process of removing an item from the listed holdings of the Library.

<sup>4</sup> Gifts-in-kind refers to donations received by the Library.

## CONCLUSION

Based on the work performed, we found that the Library has established internal controls over inventory, separation of duties, physical and digital access control, and technical support of the computer systems within the scope of this audit. However, our review highlighted opportunities to improve the following areas:

- **Documenting Procedures:** Updating current procedures with a more comprehensive description of the internal controls included in the acquisition, processing, transferring, and deaccessioning of special research collections processes. Internal controls should guarantee the chain of custody during the physical movement of the special research collections from receiving until the artifact is stored in its final destination in the SRC restricted area and/or removed from inventory.
- **Validating Separation of Duties:** Separation of duties includes documenting appropriate approval processes to ensure that more than one person is involved in completing a task. System profiles and permissions in ArchivesSpace and Aeon follow the least privilege principle recommended in IS-3: *Electronic Information Security*.
- **Reporting Library gifts-in-kind:** The Library must follow the *UC Development Reference Guide* when acquiring special collection items by documenting the process of completing the Campus Gift Acceptance Report (UDEV 100)<sup>5</sup> and reporting to the Gift Administration Office to record gifts donated to the University of California (UC) Regents.
- **Establishing High-Value Criteria:** Developing criteria for identifying high-value collections should be prioritized for digitization and additional safeguard measures.
- **Evaluating Fair Market Value and Insurance Coverage:** Conduct a thorough evaluation of the fair market values of collections and ensure appropriate insurance is in place to mitigate potential risks. Documenting an Appraisal and Insurance Registration Process. When acquiring a special collection, high-value items should be appraised internally. The Curator<sup>6</sup> can perform an appraisal process to ensure that special research collections with historical value have adequate insurance coverage.
- **Updating the Deaccessioning Guidance:** Review and update the collection removal process to ensure full compliance with UC Policies, obtain appropriate approvals, and include the Surplus Administrator in the sale or disposition of donated property. Guidance should consist of the weeding process and transparency in communication with the donor when items in the collection are removed.
- **Developing a Physical Security Plan:** A security plan should comply with UCSB's Physical access policy and include an evaluation of security infrastructures, including appropriate physical restricted area safeguards and secured storage areas, procedures to enforce and monitor access to restricted areas, and a periodic security assessment to identify security vulnerabilities and to ensure security measures are in place to protect special research collections.

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<sup>5</sup> The University's official record that documents the acceptance of a gift.

<sup>6</sup> The Curator is responsible for selecting collections of books, artifacts, or artwork that are of historical value to the University.

- **Formalizing System Access Controls:** Developing a formal process to activate and deactivate access to computer systems, including a list of those who are authorized to grant access and controls to monitor access and inventory system activity.
- **Obtaining System Technical Support:** Technical support is needed to establish adequate system management roles and responsibilities, assess the quality of the service (availability, backup, updates, vulnerabilities, etc.), and configure critical elements such as the integration between ArchivesSpace and Aeon, barcoding inventory, enabling audit logs, and performing surveillance camera vulnerability scans.

## **OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES**

### **1. PROCESSES AND PROCEDURES**

#### **OBSERVATION**

The Library has documented procedures and implemented internal controls for managing and preserving special research collections, covering key processes such as the acquisition, processing, transferring, and deaccessioning<sup>7</sup>. However, our review identified opportunities to make current procedures more comprehensive, from processing to deaccessioning.

Based on our review of SCR processes, we found that while many of the processes have been documented, they are mostly partially documented and not fully interconnected or sequential, resulting in gaps. For example, the chain of custody of special research collections in acquiring, processing, and transferring materials is not clearly described. A more comprehensive description of these processes is needed to trace the physical movement of the material from the moment of receipt to its final storage in the SRC shelves and/or removal from inventory.

#### **Acquisition**

The acquisition process does not clearly describe the decisions to:

- Determine the fair market value of special research collection items and complete the Statement of Value<sup>8</sup> based on fair market value per donation, including the process of filing the UDEV 100 form and provide the information to the UCSB Gift Administration to record gifts donated to the UC Regents. We found that non-cash gifts do not always include a formal fair market value assessment when processing the UDEV 100 form. For items without a formally stated value, a placeholder of \$1 is used to report gifts donated to the UC Regents. An accurate value should be reflected for insurance purposes (an appraised value could be beneficial when negotiating with the insurance company during a loss) and to provide a better representation of campus assets.
- Determine whether the University's general or Fine Art insurance policy should be used. All special research collections are covered under the University's general insurance policy. However, the Fine Art insurance policy can cover special research collections, which provides additional coverage against earthquake damage without extra cost. The Fine Art policy requires an estimated value of the items, but internal personnel could perform the appraisal without requiring a third party.
- Determine if high-value artifacts in special research collections require additional safeguard measures. For example, it is unclear how to determine when an item needs to be stored in the vault or if it could be digitalized to reduce exposure. Implementing a categorization process to assess the need for additional security methods could be beneficial.
- Communicate with the donor the result of the weeding process. The process does not document formal communication with the donor regarding items in the collections that

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<sup>7</sup> The process of removing items from the Libraries' collection.

<sup>8</sup> The Library uses this form to include a value assigned to the collection.

will be disposed of. The Library could improve transparency by consistently informing donors of the items in the collections that will be disposed of, ensuring that the donor is aware of the disposition of related collection items.

## Processing

The processing procedures describes how to document the inventory of special research collections in the computer system ArchivesSpace. The Aeon computer system records the movement and transfer of special collection items during processing, while the Jira system tracks project tasks related to special research collections. These systems track and monitor special research collections. However, the following is not documented:

- We found that processors<sup>9</sup> need physical access to the special research collections when cataloging them in the ArchivesSpace system. However, the process of how staff access and return collections to and from the vault or staging area is not clearly documented. As best practices suggest, the process should be more clearly defined to ensure that special research collections are secure and appropriately handled.
- The presence of two people should be required when high-value items are removed from the vault<sup>10</sup> or transferred within the Library. While some compensatory controls, such as physical access restrictions, exist, they need to be enhanced to ensure adequate security.
- The Library includes the number of containers (folder, box, flat file, audiocassettes, etc.) in the inventory of special research collections. In spite of this, the process has not been formalized to include the use of barcodes<sup>11</sup> for tracking special research collection boxes.

To assess the accuracy of the inventory in the system, we conducted a test to verify whether the collection container summary, as listed in the ArchivesSpace inventory system, matched the physical containers on the shelves in the SRC-restricted areas. We obtained a collection container summary report from the system and selected a random sample of 20 collection items. Our observation showed that the inventory system matched the physical items for most of the selected samples tested. However, we identified a discrepancy in one case, where the inventory system referenced two boxes, but five boxes were observed.

## Transferring of Materials

Transferring materials should be formally documented to describe the movement internally and external to the Library to ensure that special research collection items are adequately tracked. Procedures should include system tracking processes, support documentation, and dual custody controls that clearly explain the process for:

- Items moved from the Resource Acquisition & Discovery Services (ReADS) area to the SRC area within the Library, in and out of the staging area, and into and out of the vault, which involves moving items in and out of restricted areas.

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<sup>9</sup> Processors are responsible for adding new items to the Library's collection, updating records, and submitting the finding aid to the Online Archive of California (OAC).

<sup>10</sup> Areas where collections considered high-value items are stored.

<sup>11</sup> Barcode scanning is a critical process for efficient inventory and space management.



- Library leadership's approval process for authorizing items to be transferred outside the Library should be documented to ensure awareness of their disposition. This includes items transferred to third parties for digitization, exhibits outside the University, transfers to another non-profit institution, and returning artifacts to donors or Surplus Management for destruction.

### **Deaccessioning**

The Deaccessioning Guidance should be formally approved and updated to align with the UC Policy BUS-38: *Disposition of Excess Property and Transfer of University-Owned Property* (UC Policy BUS-38) and the UC Development Reference Guide. Specifically:

- Our review of the deaccessioning process found a lack of appropriate approvals for removing special research collections owned by the University. The current workflow for deaccessioning does not include the required approvals from the Chancellor or EVC, nor does it involve the Surplus Administrator to dispose of special research collections. The only documented deaccessioning from 2019 was approved by the Library management but not by the Chancellor or the EVC, as is required by UC Policy BUS-38.
- There is no formally documented process for notifying the donor when materials are removed from the collection. Typically, the Library does not always inform donors, and when communicated, these notifications are informal, either by email or in person. The Gift Agreement between the Library and the donor, related to the disposal of a collection, states that the Library will provide the Donor with sixty days' prior written notice to elect to return collection materials to the Donor or another not-for-profit institution selected by the donor.
- The Deaccessioning Guidance should also be updated to include a formal notification process, ensuring transparency with the donor when partial or the entire collection is selected to be removed from inventory. This would align with best practices and clarify the deselecting or weeding of special research collections.

### **RECOMMENDATION 1.1**

We recommend that the Director of SRC and the Director of ReADS update current procedures with a more comprehensive description of the internal controls included in the acquisition, processing, transferring, and deaccessioning of special research collections processes. These processes include the chain of custody and the physical movement of the special collection from the moment it is received until the artifact is stored in its final destination in the SCR-restricted area and removed from inventory.

### **MANAGEMENT RESPONSE 1.1**

The Director of SRC and the Director of ReADS agree to update their procedures and create a comprehensive description of internal controls included in the acquisition, processing, transferring, and deaccessioning of special research collections. The Library will document the chain of custody for special research collections, tracing their movement from receipt to final storage or removal from inventory. This will involve reviewing and documenting each step of the acquisition, processing, transferring, and deaccessioning processes.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

## **RECOMMENDATION 1.2**

We recommend the Director of SRC document a process to assess the value of special research collections and insurance registration. If the value cannot be assessed based on the fair market value, other alternatives can be used to establish the value of the special collections.

### **MANAGEMENT RESPONSE 1.2.1**

The Director of SRC will develop and document a process for Curators to assess the value of donated materials when not appraised by third-party appraisers. Given the fact that it would be difficult to assess the fair market value of certain collections (i.e., those that have high research value but not necessarily high market value for resell), the assessment process will include the UC guidance for Unit Values Used for the Insurance of Library Materials.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

### **MANAGEMENT RESPONSE 1.2.2**

The Director of SRC and the Director of BOPS will develop and document an overarching policy and related workflow for the insurance registration of high-value items that have been acquired or donated. This will include determining whether the University's general or Fine Art insurance policy should be used and, if so, in what cases.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

## **RECOMMENDATION 1.3**

We recommend that the Director of SRC and the Director of ReADS develop a Deaccessioning Policy that includes obtaining appropriate approvals and the Surplus Administrator in the process related to the sale or disposition of donated property to comply with UC policies, including the weeding process and communications with the donor regarding items in the collection that will be disposed of.

### **MANAGEMENT RESPONSE 1.3**

The Director of SRC and the Director of ReADS will develop a Deaccessioning Policy, which will include guidance on how to obtain appropriate approvals in compliance with UC policies, as well as guidance for documenting the weeding process and communicating with the donor regarding items in the collection that will be disposed of.

*Audit and Advisory Services will follow up on the status of these issues by October 28, 2025.*

## **RECOMMENDATION 1.4**

We recommend that the Director of SRC and the Director of ReADS evaluate fully configuring the inventory system to enable barcode scanning to improve the inventory quality.

#### **MANAGEMENT RESPONSE 1.4**

The Director of SRC and the Director of ReADS will fully configure the inventory system in ArchiveSpace to enable barcode scanning to improve inventory quality and control.

*Audit and Advisory Services will follow up on the status of these issues by December 9, 2025.*

#### **RECOMMENDATION 1.5**

We recommend that the Director of SRC and Digital Collections Coordinator develop and formalize the criteria for identifying high-value collections, including developing a process to prioritize digitization (i.e., based on available funding and other digitization criteria and factors we developed, etc.) and provide guiding principles for when additional safeguards, such as vault storage, are necessary.

#### **MANAGEMENT RESPONSE 1.5**

The Director of SRC and Digital Collections Coordinator agree to develop and formalize criteria for identifying high-value collections, including developing a process to prioritize digitization (i.e., based on available funding and other digitization criteria and factors developed following best practices and standards in research libraries) and providing guiding principles for when additional safeguards, such as vault storage, are necessary.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

## **2. SEPARATION OF DUTIES**

### **OBSERVATION**

#### **Approval Processes**

The Library requires formal approvals in relevant processes handling special research collections, including acquiring and processing them. However, as mentioned above, the deaccessioning process does not currently include the required signatures from the AUL, Chancellor, or Executive Vice Chancellor (EVC) when removing partial or complete special research collections, as is required by UC Policy BUS-38.

Evidence of the approvals is retained in different repositories and systems. Specifically,

- The Associate University Librarian (AUL) approves the acquisition of special research collections through the Gift Agreement with the donor. Signed gift agreements are maintained in a shared folder.
- The Curator is responsible for approving the finalization of the processing process. The approval process is mentioned in the *SRC Processing Lifestyle for New Collections* and should include more detail. Our review found that the Curator's approval is required before the special research collection information (finding aid) is published in the Online Archive of California<sup>12</sup> (OAC). The approval process is captured and tracked in the Jira

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<sup>12</sup> Online Archive of California provides the ability to search for rare and unique historical materials throughout California.

project status system<sup>13</sup>.

- The deaccessioning of artifacts is recorded in ArchivesSpace, and approvals are executed in a Deaccessioning processing Agreement Form<sup>14</sup>. The Deaccessioning Agreement Form is maintained in a shared drive. We found that one collection has been deaccessioned since the system was implemented in 2019. The Deaccessioning Agreement Form included the Library management's approval to remove the special research collection. However, as previously stated, approvals from the Chancellor or the EVC were not obtained in the approval process. The Deaccessioning Guidance should include these steps to ensure proper approvals are obtained before deaccessioning UC collections.

## **Computer System Roles and Privileges**

### *ArchiveSpace*

We found that the separation of duties matrix in ArchivesSpace and Aeon does not fully follow the least privilege principles to ensure that separation of duty is implemented. User permissions were not limited to only what is needed for their job. Additionally, deleting activities in the Aeon system should be evaluated and limited to specific personnel.

We found that ArchivesSpace privileges are organized into the following roles: Viewers, Processing Assistants, Processors, Catalogers, Stacks managers, and Managers. However, we observed that:

- The Library does not clearly understand each role's specific privileges or the differences among roles.
- Many user accounts had assigned several roles without a clear business justification. For example, curators can modify the inventory information included by the processors. However, as the party responsible for approving the collection information entered into the system, they should not have the privilege to modify the information.

The Interim SRC Director and the Interim System Administrator have reviewed the current role matrix and are working on a new matrix that better aligns profiles with job tasks.

### *Aeon*

We found several personnel had administrator rights in the Aeon system. These users included a Data Analyst, IT Support, SRC Public Services Assistant Administrator, Geospatial Admin Administrator, and Desktop IT Support Administrator. Aeon system administrators were justified to have a business need for access. However, they should evaluate the actual needs of these users to minimize the number of users with administrator access.

## **RECOMMENDATION 2.1**

We recommend that the Director of SRC and the Director of ReADS document the approval

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<sup>13</sup> Jira ticketing system: see background section.

<sup>14</sup> Deaccessioning Agreement Form permanently releases The Regents from all rights, titles, and interests in a special research collection.

workflow process for the acquisition, processing, and deaccessioning of special research collections, including the roles and responsibilities of the parties involved in these processes and the support documentation of the approvals.

#### **MANAGEMENT RESPONSE 2.1**

The Director of SRC and the Director of ReADS will document the approval workflow process of the acquisition, processing, and deaccessioning of special research collections, including the roles and responsibilities of the parties involved in these processes and the support documentation of the approvals.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

#### **RECOMMENDATION 2.2**

We recommend that the Director of ReADS complete and implement in ArchivesSpace a new separation of duties matrix that follows the least privilege principles based on the needs of the job users perform.

#### **MANAGEMENT RESPONSE 2.2**

The Director of ReADS will finalize and implement a new separation of duties matrix within ArchivesSpace to align user permissions with job responsibilities, following the least privilege principle.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

#### **RECOMMENDATION 2.3**

We recommend that the Director of SRC assess the current Aeon users with administrative privileges and determine if they can be reduced.

#### **MANAGEMENT RESPONSE 2.3**

The Director of SRC agrees to assess the administrative privileges of current Aeon users and reduce the number of users with this level of access as appropriate.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

### **3. PHYSICAL ACCESS AND SECURITY INFRASTRUCTURE**

#### **OBSERVATION**

Our review highlighted opportunities to improve physical security measures supported by a security plan. A security plan covering periodic assessments of physical security infrastructure, access control requirements, and processes for granting and monitoring access could improve physical security awareness and compliance with physical access policies and best practices in the Library. Additionally, it would help to identify potential physical security risks.

## Physical Security Infrastructure

The Library has implemented an entry point schematic model identifying employee access levels and a schematic map of surveillance cameras and coverage. Vaults are restricted to a limited number of personnel. However:

- The SRC-restricted areas are not physically separated from the ReADS area. Five entry points to restricted areas did not have card readers, leaving access open to unauthorized personnel. During our audit, two card readers were installed, reducing the number of unsecured doors to three. Installing card readers at all entry points would help monitor and limit unauthorized access.
  - Employees are not required to use access cards to enter and exit SRC restricted areas from the main Library floor.
  - Dual presence is not required in SRC's restricted areas after regular working hours or when accessing or transferring high-value items.
- Some SRC materials are stored in areas that are not restricted to SRC personnel. For example, the staging area where new SRC materials are stored during processing is located with general items, such as maps accessed by non-SRC personnel. Creating physical barriers helps prevent unauthorized access.
- The current surveillance camera coverage has not been periodically evaluated to assess adequate security controls by reviewing surveillance cameras' functionality, quantity, coverage, and placement. During our audit, the Library created a schematic map of surveillance camera locations and coverage, including current and former restricted areas. Cameras may no longer be necessary in former restricted areas. IT Administrative Support informed us that the existing surveillance system does not alert management of unusual circumstances in restricted areas, such as personnel leaving SRC areas with bags.
- Bag restrictions apply only to students, and career employees are not prohibited from bringing bags into restricted areas. As a compensatory control, the Library should evaluate the current surveillance technology and enhance system functionalities to help improve monitoring.
- There is no documented process for escorting unauthorized personnel within restricted areas. For example, IT personnel need to access server rooms, or maintenance personnel need access for repairs. Establishing a formal procedure for escorting and monitoring personnel not authorized to enter restricted areas would enhance security measures and ensure access is appropriately controlled.

## RECOMMENDATION 3.1

We recommend that the Director of BOPS, the Director of SRC, and the Director of ReADS complete the Library security plan that provides a more comprehensive overview of security and safety measures in SRC, including, but not limited to:

- Evaluating if additional physical security requirements need to be implemented, such as mandatory use of access cards to enter and exit SRC restricted areas, bag restrictions, dual presence, escorting non-authorized personnel, and others.
- Assessing if additional access control checks, physical barriers, or restricted area enclosures are required to physically separate SRC areas from other parts of the Library.
- Establishing a periodic security assessment to identify physical security enhancements that help to develop a more mature security environment. This will help make informed decisions regarding upgrades, maintenance, or new security technology to mitigate potential risks.

### **MANAGEMENT RESPONSE 3.1**

The Director of BOPS, the Director of SRC, and the Director of ReADS will:

- Finalize the security policy and create a plan that addresses physical security requirements, such as the mandatory use of access cards to enter and exit SRC restricted areas, bag restrictions, dual presence required to remove items from the SRC vault, use of the front and back doors in SRC Bldg. A, escorting non-authorized personnel, and secured spaces access policy: hours and authorization for curators and staff.
- Assess the need for additional access control checks, physical barriers, or restricted area enclosures to separate SRC areas from other parts of the Library.
- Establish a periodic security assessment to identify physical security enhancements and make informed decisions regarding upgrades, maintenance, or new security technology.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

### **RECOMMENDATION 3.2**

We recommend the Director of BOPS update physical access controls, including access cards and mechanical key controls, and the processes to activate, deactivate, and monitor access.

### **MANAGEMENT RESPONSE 3.2**

The Director of BOPS will update physical access controls, including access cards and mechanical key controls, and the processes to activate, deactivate, and monitor access.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

### **Granting Physical Access**

The Library does not always retain the required support documentation for access requests to SRC-restricted areas. Additionally, a list of personnel authorized to request employee access needs to be formalized.

Our review of a random sample of five access requests to gain access to SRC-restricted areas in FY 2023-24 found that the Library Access Card Programming Activation Form<sup>15</sup> is not consistently used, and the support documentation is not retained as required by the UCSB Physical Access Policy<sup>16</sup>. Only one of the five access requests was granted using the formal authorization control form. The remaining four individuals were authorized; however, the requests were in the form of emails or in-person.

As mentioned above, the party responsible for granting access to restricted areas has not been officially documented. It is inferred that the Library Building Operations (BOPS) is the only unit responsible for granting access. However, we found that Lenel<sup>17</sup> administrators in ETS can grant access, and selected non-SRC personnel can request access for students to SRC areas. Furthermore, the department has a process for managing access using mechanical keys; however, the process was not formally documented in a procedure.

### **Monitoring Physical Access**

The Library has established a security infrastructure to monitor physical access to restricted SRC areas, including access card readers, surveillance cameras, and alarm systems. In addition, the Library has developed a schematic map of door access points and surveillance coverage of restricted areas.

We evaluated the monitoring process and found no formal process to evaluate or periodically verify physical access in SRC-restricted areas. Our review of card reader system access records for FY 2023-24 and the current list of employees found that of the 68 individuals who had access to SRC areas, only 29 were active SRC employees. The other 39 were non-SRC employees, and some of them had a temporary business need to get access but were granted access without an expiration date. During our audit, the Library evaluated physical access to restricted SRC locations, and physical access to restricted SRC locations was updated accordingly.

### **RECOMMENDATION 3.3**

We recommend that the Director of BOPS:

- Enforce using Library Access Card – Activation form to request physical access to SRC-restricted areas.
- Enforce the use of the Library Access Card – Deactivation form to request the elimination of access to SRC-restricted areas.
- Perform annual reviews of users accessing the SRC-restricted areas and update them based on business needs.

### **MANAGEMENT RESPONSE 3.3**

The Director of BOPS will:

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<sup>15</sup> A form used to record access requests and personnel who authorized the request to grant access.

<sup>16</sup> The policy applies to all campus community members and governs physical access controls for all facilities managed by UCSB.

<sup>17</sup> The University physical access control system.



- Enforce the use of the Library Access Card Activation form for all physical access requests to SRC restricted areas.
- Enforce the use of the Library Access Card Deactivation form to request the elimination of access to SRC restricted areas.
- Develop and implement a new access policy for the annual review of SRC-restricted areas, perform annual reviews of users accessing SRC-restricted areas, and update access based on current business needs.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

#### **4. COMPUTER SYSTEM OPERATIONS AND SUPPORT**

##### **OBSERVATION**

Our review of IT operations and technical support for computer systems within the scope of this review found a need to formalize the access requested process for ArchivesSpace and Aeon and reevaluate the current IT technical support provided to ArchivesSpace.

##### **Granting System Access**

To get access<sup>18</sup> to ArchivesSpace and Aeon, designated employees need to request access from the administrators of these computer systems. However, access requests are sometimes verbal with no support documentation, or requests are stored in personal email accounts, making it very difficult to meet policy retention requirements if the administrator leaves the university. Furthermore, this process is not formally documented, and there is no formal list of authorized personnel to request user access.

We obtained a list of employees granted access to ArchivesSpace in FY 2023-24 and selected a random sample of five employees. The support documentation was not adequately retained in two of the five requests. The support documentation for the other three cases was email requests stored in the administrator's email accounts. The requests were sent by personnel with a business role in the process and authorized by the ArchivesSpace administrator. Still, there is no formal list of authorized personnel to request access on behalf of the users.

In addition, we were informed that there is no formal process for granting access to Aeon. Access requests can be through email, chat, or in person. A formal process to request access and a list of authorized personnel would help improve access controls and support documentation.

##### **RECOMMENDATION 4.1**

We recommend that the Director of SRC and the Director of ReADS:

- Develop a formal access authorization process to track and monitor access to ArchivesSpace and Aeon. All requests should be documented and retained based on the UC Policy retention schedule. Additionally, the list of personnel authorized to request access on behalf of other users should be formalized.

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<sup>18</sup> Access to the Lenel and surveillance cameras is limited to administrators and was not assessed in this audit.

- Evaluate using the Jira ticketing system to track personnel activation and deactivation, pre-approval using an authorized list, or a post-approval process that includes informing the SRC Director of access activity.

#### **MANAGEMENT RESPONSE 4.1**

The Director of SRC and the Director of ReADS will:

- Develop a formal access authorization process for ArchivesSpace and Aeon to track and monitor access. They will document and retain all requests based on the UC Policy retention schedule. They will also formalize the process for authorizing and granting access based on best practices in research libraries.
- Explore using the Jira ticketing system for tracking personnel activation and deactivation in ArchivesSpace and Aeon. This will include tracking personnel activation and deactivation, pre-approval using an authorized list, or a post-approval process that includes informing the Directors or SRC and ReADS of access activity.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

#### **Monitoring**

We interviewed the administrators of the main computer systems in the scope of this review regarding monitoring functionalities and found the following:

- The Lenel system has audit logs that track physical access events and alarms. These logs can be read by functional administrators (Library personnel) and only deleted by IT administrators (ETS). Any attempt to delete an audit log is recorded in the system.
- ArchivesSpace audit logs only track the username of the last modification made in a collection and the date and time of the modification. The vendor informed the functional administrator that no additional audit log was available. However, modern databases usually allow for the activation of detailed audit logs.
- Aeon has audit logs to track access requests to special research collections. This allows the Library to track collection movements outside of the restricted area for Special Research Collections. Aeon tracks the date and time of each request. The requester can cancel a request but not delete the audit log in the system.

#### **RECOMMENDATION 4.2**

We recommend that the Director of SRC and the Director of ReADS evaluate alternatives to monitoring modifications once collections are published to the Online Archive of California (OAC) so management can review changes and deletions of special research collections. Curators should not have permission to modify inventory.

#### **MANAGEMENT RESPONSE 4.2**

The Director of SRC and the Director of ReADS will evaluate alternatives to monitoring modifications after collections are published to the OAC. They will ensure management can

review changes and deletions of special research collections. They will ensure Curators do not have permission to modify inventory.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

## **IT Technical Support**

Computer systems in the scope are operated by the Library's personnel. ITS provides IT technical support to Lenel and the surveillance cameras. Atlas<sup>19</sup>, an external vendor, provides cloud services for ArchivesSpace and Aeon. However, there is no clear technical role to assess the current configuration of critical elements in ArchiveSpace, such as discussions with the provider about the availability of additional audit logs from the database.

### *Lenel*

We determined that Lenel has formal IT technical support. ITS Integrated Technical Operations manages Lenel. Responsibilities are defined to guarantee a secure configuration, authentication, access control, backup, operations, and maintenance for Lenel. The Library IT Technical System Administrator handles patches, backups, and updates to the latest version of Lenel. Door access audit trails and alerts exist, and door access logs cannot be deleted.

### *Surveillance Cameras*

ITS Integrated Technical Operations manages surveillance cameras and provides IT technical support. However, we were informed that vulnerability scans of the cameras connected to the campus network were not performed. A third party manages the surveillance system. It has 24/7 alerts that notify ITS when it goes down. Video recordings cannot be deleted.

### *ArchivesSpace*

There is designated technical support with an external vendor (Atlas is the vendor for the ArchiveSpace cloud system). However, the contract with the vendor does not define service level agreements, and there is no technical support on the University side to assess the quality of the service and configure critical elements such as audit logs.

The authentication process is managed through the campus identity using the UCSB NetID. We found that the Interim Library System Administrator manages the functional administration, including granting and deactivating access and configuring system profiles and permissions.

### *Aeon*

The Aeon contract is a system-wide contract that UCOP manages. The Aeon system is supported, but Atlas and the campus provide only technical support for installing the software on the clients. We found that the Library is not using the most recent version of Aeon client software to address potential security issues. The current version installed is 5.2.22, the version should be updated to 5.2.3.

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<sup>19</sup> Atlas provides cloud services for ArchivesSpace and Aeon systems.

### **RECOMMENDATION 4.3**

We recommend that the AUL for Research Resources and Scholarly Communication & AUL for Digital Strategies discuss with the Office of the CIO the possibility of:

- Assessing whether the current Atlas contract for ArchivesSpace includes adequate clauses to guarantee the quality of the service.
- Providing IT technical support to ArchiveSpace to assess if additional audit logs and reporting functionalities could be developed.

### **MANAGEMENT RESPONSE 4.3**

The AUL for Research Resources and Scholarly Communication & AUL for Digital Strategies will discuss with the Office of the CIO:

- The possibility of assessing the Atlas contract for ArchivesSpace to ensure adequate service quality clauses.
- Whether the Library can obtain the IT technical support required to assess with the vendor if there are audit logs and reporting functionalities in the system that can be activated.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

### **RECOMMENDATION 4.4**

We recommend the Director of ReADS evaluate the integration between ArchivesSpace and Aeon and implement a procedure to guarantee Aeon client software is updated.

### **MANAGEMENT RESPONSE 4.4**

The Director of ReADS is already working on the integration between ArchivesSpace and Aeon, and is implementing a procedure to guarantee Aeon client software is updated.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025*

### **RECOMMENDATION 4.5**

We recommend the Director of BOPS include surveillance cameras in the campus vulnerability scans.

### **MANAGEMENT RESPONSE 4.5**

The Director of BOPS will ensure that surveillance cameras are included in the campus vulnerability scans.

*Audit and Advisory Services will follow up on the status of these issues by August 12, 2025.*

## GENERAL INFORMATION

### BACKGROUND<sup>20</sup>

#### Special Research Collections

The University of California, Santa Barbara Library holds the general collection and several special research collections: the Sciences and Engineering Collection, the Map and Imagery Laboratory, Curriculum Resources, the East Asian Collection, the Art and Architecture Collection, and the Ethnic and Gender Studies Collection. The Department of Special Research Collections is also part of the Main Library.

The Department of Special Research Collections acquires, preserves, and makes accessible rare, valuable, or unique materials that support UC Santa Barbara students, faculty, research programs, and the scholarly community. Special Research Collections holds rare books, manuscripts, and several collections, including the Performing Arts Collection, the Wyles Collection on the American West, the Scofield Printers' Collection, and the California Ethnic and Multicultural Archives. Printed materials include books and serials, manuscripts, and audio-visual materials. Among Special Research Collections holdings are approximately 250,000 volumes, 16,000 linear feet of manuscripts, 100,000 photographs, and more than 400,000 sound recordings.

Preservation and digitization are core components of Special Research Collections' mission to preserve unique and rare materials for posterity and make them more widely accessible by digitizing items for online or mediated electronic access. To facilitate this, Special Research Collections has several preservation and digitization operations within the Library, and collections are also sent to a third party for digitization.

#### *ArchivesSpace*<sup>21</sup>

ArchivesSpace is an open-source information management application that manages and provides access to archives, manuscripts, and digital objects. It also supports a range of archival functions. ArchivesSpace can describe physical and digital material, including born-digital materials and digital representations of physical objects. It supports many functions of archival work, including processing, arrangement and description, assessment of materials, and location management. ArchivesSpace maintains both a staff and public user interface.

#### *Aeon*<sup>22</sup>

Aeon is a special research collections circulation and workflow automation software for library special research collections. The Aeon computer system records the movement and transfer of special collection items within the Library floor and transfers made outside the Library. It is also a request and fulfillment workflow management system from Atlas Systems specifically designed for special research collections and archives. An Aeon account allows you to request rare materials before a reading room visit.

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<sup>20</sup> UCSB Library website.

<sup>21</sup> ArchivesSpace website.

<sup>22</sup> Aeon website.

### *Lenel*<sup>23</sup>

Lenel is an access control system integrated into the security infrastructure with ID credential issuance and management. The access controls provide security controls to monitor and track access restricted areas.

## **SCOPE**

Our review focused on the University Library Special Research Collections' internal controls during the fiscal year 2023-24.

## **CRITERIA AND METHODOLOGY**

Our audit was based on standards outlined in UC and UCSB policies, best practices, and other guidance relevant to the scope of the audit. To accomplish our objectives, our work included interviews, observations, review of support documentation, testing, and other steps. Specifically, we:

- Reviewed UC and UCSB policies, best practices, procedures, and other guidance relevant to the scope of the audit:
  - University of California Business and Finance Bulletin BUS-38, Disposition of Excess Property and Transfer of University Owned Property. (UC Policy BUS 38)
  - University of California Business and Finance Bulletin BFB-IS-3, Electronic Information Security. (UC Policy IS-3)
  - UC Santa Barbara Physical Access Control Policy, June 24, 2013.
  - Association of College & Research Libraries, Guidelines Regarding the Security of Special Collection Materials, revised June 2023.
- Interviewed University personnel to understand the Library's processes, policies, and procedures for administering and managing Special research collections.
- Performed a risk analysis considering business-related policy and procedures including roles and responsibilities, separation of duties, inventory, and physical and system access.
- Inquired about the inventory process to determine whether adequate controls exist for handling and tracking special collection items.
- Tested a sample of physical access events to determine whether there is adequate tracking, approvals, and support documentation of granted access to restricted areas based on business needs.
- Evaluated Library personnel's access to special collection areas to determine whether they incorporated adequate physical security controls, such as granting and monitoring access to restricted areas.
- Inquired about deaccessioning special collection items to determine whether adequate

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<sup>23</sup> Lenel website.

controls and approvals exist when removing and disposing of items from the inventory.

- Performed physical observations of security measures in restricted Special Research Collection areas and reviewed opportunities to enhance and improve security safeguards.
- Evaluated computer system management to determine whether the systems are adequately managed, appropriate roles and responsibilities are defined, access to systems is formalized, and system permissions are regulated.
- Assessed whether adequate technical support exists to assess the quality of the service (availability, backup, updates, vulnerabilities, etc.) and configure critical elements for efficiency and performance.

This Audit was conducted in conformance with *the International Standards for the Professional Practice of Internal Auditing*.

## **AUDIT TEAM**

Ashley Andersen, Audit Director  
Antonio Mañas Meléndez, Associate Audit Director  
Irene Camargo, Senior Auditor

Table 1	Recommendations		
Recommendation	Management Response	Owner	Implementation Date
<b>1. PROCESSES AND PROCEDURES</b>			
<p>1.1 We recommend that the Director of SRC and the Director of ReADS update current procedures with a more comprehensive description of the internal controls included in the acquisition, processing, transferring, and deaccessioning of special research collections processes. These processes include the chain of custody and the physical movement of the special collection from the moment it is received until the artifact is stored in its final destination in the SCR-restricted area and removed from inventory.</p>	<p>1.1 The Director of SRC and the Director of ReADS agree to update its their procedures and create a comprehensive description of internal controls included in the acquisition, processing, transferring, and deaccessioning of special research collections. The Library will document the chain of custody for special research collections, tracing their movement from receipt to final storage or removal from inventory. This will involve reviewing and documenting each step of the acquisition, processing, transferring, and deaccessioning processes.</p>	<p>Director of SRC Director of ReADS</p>	<p>August 12, 2025</p>
<p>1.2 We recommend the Director of SRC document a process to assess the value of special research collections and insurance registration. If the value cannot be assessed based on the fair market value, other alternatives can be used to establish the value of the special collections.</p>	<p>1.2.1 The Director of SRC will develop and document a process for Curators to assess the value of donated materials when not appraised by third-party appraisers. Given the fact that it would be difficult to assess the fair market value of certain collections (i.e., those that have high research value but not necessarily high market value for resale), the assessment process will include the UC guidance for Unit Values Used for the Insurance of Library Materials.</p>	<p>Director of SRC</p>	<p>August 12, 2025</p>
	<p>1.2.2 The Director of SRC and Director of BOPS will develop and document an overarching policy and related workflow for the insurance registration for high-value items that have been acquired or donated. This will include determining whether the University's general or Fine Art's insurance policy should be used and, if so, in what cases.</p>	<p>Director of SRC Director of BOPS</p>	<p>August 12, 2025</p>
<p>1.3 We recommend that the Director of SRC and the Director of ReADS develop a Deaccessioning Policy that includes obtaining appropriate approvals and the Surplus Administrator in the process related to the sale or disposition of donated property to comply with UC policies, including the weeding process and communications with the donor regarding items in the collection that will be disposed of.</p>	<p>1.3 The Director of SRC and the Director of ReADS will develop a Deaccessioning Policy, which will include guidance on how to obtain appropriate approvals in compliance with UC policies, as well as guidance for documenting the weeding process and communicating with the donor regarding items in the collection that will be disposed of.</p>	<p>Director of SRC Director of ReADS</p>	<p>October 28, 2025</p>



Table 1	Recommendations		
Recommendation	Management Response	Owner	Implementation Date
1.4 We recommend that the Director of SRC and the Director of ReADS evaluate fully configuring the inventory system to activate enable barcode scanning to improve the inventory quality.	1.4 The Director of SRC and the Director of ReADS will fully configure the inventory system in ArchiveSpace to enable barcode scanning to improve inventory quality and control.	Director of SRC  Director of ReADS	December 9, 2025
1.5 We recommend that the Director of SRC and Digital Collections Coordinator develop and formalize the criteria for identifying high-value collections, including developing a process to prioritize digitization (i.e., based on available funding and other digitization criteria and factors we developed, etc.) and provide guiding principles for when additional safeguards, such as vault storage, are necessary.	1.5 The Director of SRC and Digital Collections Coordinator agree to develop and formalize criteria for identifying high-value collections, including developing a process to prioritize digitization (i.e., based on available funding and other digitization criteria and factors developed following best practices and standards in research libraries) and providing guiding principles for when additional safeguards, such as vault storage, are necessary.	Director of SRC  Digital Collections Coordinator	August 12, 2025
<b>2. SEPARATION OF DUTIES</b>			
2.1 We recommend that the Director of SRC and the Director of ReADS document the approval workflow process of for the acquisition, processing, and deaccessioning of special research collections, including the roles and responsibilities of the parties involved in these processes and the support documentation of the approvals.	2.1 The Director of SRC and the Director of ReADS will document the approval workflow process of the acquisition, processing, and deaccessioning of special research collections, including the roles and responsibilities of the parties involved in these processes and the support documentation of the approvals.	Director of SRC  Director of ReADS	August 12, 2025
2.2 We recommend that the Director of ReADS complete and implement in ArchivesSpace a new separation of duties matrix that follows the least privilege principles based on the needs of the job users perform	2.2 The Director of ReADS will finalize and implement a new separation of duties matrix within ArchivesSpace to align user permissions with job responsibilities, following the least privilege principle.	Director of ReADS	August 12, 2025
2.3 We recommend that the Director of SRC assess the current Aeon users with administrative privileges and determine if they can be reduced.	2.3 The Director of SRC agrees to assess the administrative privileges of current Aeon users and reduce the number of users with this level of access as appropriate	Director of SRC	August 12, 2025
<b>3. PHYSICAL ACCESS AND SECURITY INFRASTRUCTURE</b>			
3.1 We recommend that the Director of BOPS, the Director of SRC, and the Director of ReADS complete the Library security plan that provides a more comprehensive overview of security and safety measures in SRC, including, but not limited to:	3.1 The Director of BOPS, the Director of SRC, and the Director of ReADS will:	Director of BOPS  Director of SRC	August 12, 2025

Table 1	Recommendations		
Recommendation	Management Response	Owner	Implementation Date
<ul style="list-style-type: none"> <li>Evaluating if additional physical security requirements need to be implemented, such as mandatory use of use access cards to enter and exit SRC restricted areas, bag restrictions, dual presence, escorting non-authorized personnel, and others.</li> <li>Assessing if additional access control checks, physical barriers, or restricted area enclosures are required to physically separate SRC areas from other parts of the Library.</li> <li>Establishing a periodic security assessment to identify physical security enhancements that help to develop a more mature security environment. This will help make informed decisions regarding upgrades, maintenance, or new security technology to mitigate potential risks.</li> </ul>	<ul style="list-style-type: none"> <li>Finalize the security policy and create a plan that addresses physical security requirements, such as the mandatory use of access cards to enter and exit SRC restricted areas, bag restrictions, dual presence required to remove items from the SRC vault, use of the front and back doors in SRC Bldg. A, escorting non-authorized personnel, and secured spaces access policy: hours and authorization for curators and staff.</li> <li>Assess the need for additional access control checks, physical barriers, or restricted area enclosures to separate SRC areas from other parts of the Library.</li> <li>Establish a periodic security assessment to identify physical security enhancements and make informed decisions regarding upgrades, maintenance, or new security technology.</li> </ul>	Director of ReADS	
<p>3.2</p> <p>We recommend the Director of BOPS update physical access controls, including access cards and mechanical key controls, and the processes to activate, deactivate, and monitor access.</p>	<p>3.2</p> <p>The Director of BOPS will update physical access controls, including access cards and mechanical key controls, and the processes to activate, deactivate, and monitor access.</p>	Director of BOPS	August 12, 2025
<p>3.3</p> <p>We recommend that the Director of BOPS:</p> <ul style="list-style-type: none"> <li>Enforce using Library Access Card – Activation form to request physical access to SRC-restricted areas.</li> <li>Enforce the use of the Library Access Card – Deactivation form to request the elimination of access to SRC restricted areas.</li> <li>Perform annual reviews of users accessing the SRC restricted areas and update them based on business needs.</li> </ul>	<p>3.3</p> <p>The Director of BOPS will:</p> <ul style="list-style-type: none"> <li>Enforce the use of the Library Access Card Activation form for all physical access requests to SRC-restricted areas.</li> <li>Enforce the use of the Library Access Card Deactivation form to request the elimination of access to SRC-restricted areas.</li> <li>Develop and implement a new access policy for the annual review of SRC-restricted areas, perform annual reviews of users accessing SRC-restricted areas, and update access based on current business needs.</li> </ul>	Director of BOPS	August 12, 2025
<b>4. COMPUTER SYSTEM OPERATIONS AND SUPPORT</b>			
<p>4.1</p> <p>We recommend that the Director of SRC and the Director of ReADS:</p>	<p>4.1</p> <p>The Director of SRC and the Director of ReADS will:</p>	Director of SRC	August 12, 2025

Table 1	Recommendations		
Recommendation	Management Response	Owner	Implementation Date
<ul style="list-style-type: none"> <li>• Develop a formal access authorization process to track and monitor access to ArchivesSpace and Aeon. All requests should be documented and retained based on the UC Policy retention schedule. Additionally, the list of personnel authorized to request access on behalf of other users should be formalized.</li> <li>• Evaluate using the Jira ticketing system to track personnel activation and deactivation, pre-approval using an authorized list, or a post-approval process that includes informing the SRC Director of access activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop a formal access authorization process for ArchivesSpace and Aeon to track and monitor access. They will document and retain all requests based on the UC Policy retention schedule. They will also formalize the process for authorizing and granting access based on best practices in research libraries.</li> <li>• Explore using the Jira ticketing system for tracking personnel activation and deactivation in ArchivesSpace and Aeon. This will include tracking personnel activation and deactivation, pre-approval using an authorized list, or a post-approval process that includes informing the Directors or SRC and ReADS of access activity.</li> </ul>	Director of ReADS	
<p>4.2 We recommend that the Director of SRC and the Director of ReADS evaluate alternatives to monitoring modifications once collections are published to the Online Archive of California (OAC) so management can review changes and deletions of special research collections. Curators should not have permission to modify inventory.</p>	<p>4.2 The Director of SRC and the Director of ReADS will evaluate alternatives to monitoring modifications after collections are published to the OAC. They will ensure management can review changes and deletions of special research collections and that Curators do not have permission to modify inventory.</p>	Director of SRC  Director of ReADS	August 12, 2025
<p>4.3 We recommend that the AUL for Research Resources and Scholarly Communication &amp; AUL for Digital Strategies discuss with the Office of the CIO the possibility of:</p> <ul style="list-style-type: none"> <li>• Assessing whether the current Atlas contract for ArchivesSpace includes adequate clauses to guarantee the quality of the service.</li> <li>• Providing IT technical support to ArchiveSpace to assess if additional audit logs and reporting functionalities could be developed.</li> </ul>	<p>4.3 The AUL for Research Resources and Scholarly Communication &amp; AUL for Digital Strategies will discuss with the Office of the CIO:</p> <ul style="list-style-type: none"> <li>• The possibility of assessing the Atlas contract for ArchivesSpace to ensure adequate service quality clauses.</li> <li>• Whether the Library can obtain the IT technical support required to assess with the vendor if there are audit logs and reporting functionalities in the system that can be activated.</li> </ul>	AUL for Research Resources and Scholarly Communication  AUL for Digital Strategies	August 12, 2025
<p>4.4 We recommend the Director of ReADS evaluate the integration between ArchivesSpace and Aeon and implement a procedure to guarantee Aeon client software is updated.</p>	<p>4.4 The Director of ReADS is already working on the integration between ArchivesSpace and Aeon, and is implementing a procedure to guarantee Aeon client software is updated.</p>	Director of ReADS	August 12, 2025

Table 1		Recommendations		
Recommendation		Management Response	Owner	Implementation Date
4.5 We recommend the Director of BOPS include surveillance cameras in the campus vulnerability scans		4.5 The Director of BOPS will ensure that surveillance cameras are included in the campus vulnerability scans.	Director of BOPS	August 12, 2025

Source: Audit & Advisory Services