UCSB Audit and Advisory Services

Internal Audit Report

Student Elections

March 12, 2012

Performed by:
Sam Hartline, Principal Auditor

Approved by:
Robert Tarsia, Acting Director

Report No. 08-12-00004

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University of California, Santa Barbara

March 12, 2012

To: Vice Chancellor Michael Young
        Student Affairs

Re: **Student Elections**
        Audit Report No. 08-12-00004

As part of the 2011-12 annual audit plan, Audit and Advisory Services conducted an audit of the campus Student Elections process. Enclosed is the audit report detailing the results of our review.

The primary purpose of the audit was to ensure that appropriate processes and internal controls are in place over University of California, Santa Barbara (UCSB) student elections to ensure compliance with applicable University policies, procedures and accepted practices. The scope of the review was limited to campus student elections conducted during the spring quarters of 2010 and 2011, and the elections processes related to mandatory fee initiatives and the reaffirmation of existing fees. Our scope included:

- Fee Initiative and Reaffirmation Processes
- Methods and Requirements for Adding Fee Measures to the Ballots
- Ballot Language Review and Approval Processes
- Information Technology (IT) General Controls Over the Voting Website
- Related Policies, Guidelines, Regulations, and Business Practices

The audit found no critical weaknesses or major deficiencies in the campus student elections processes and procedures reviewed. Our review also found that ballot language and details for 2010 and 2011 fee initiatives and reaffirmations were consistent from the start of each process (the proposals) through to the petitions (fee initiatives only), original ballot (fee reaffirmations only), publicized ballot, and final online ballot verbiage. This was an area we were specifically asked to include in the scope of our review.

The review did identify significant opportunities to further streamline and improve the accuracy, transparency, accountability, and perceived objectivity of elections practices and procedures. These include consolidating all campus student fee initiative and reaffirmation processes under the Campus Elections Commission (CEC) process, improving CEC recordkeeping practices and its procedures for validation of election results, and adding or enhancing certain practices and procedures related to the online elections voting website.

We have included a copy of our detailed observations and management corrective actions. The management corrective actions provided indicate that each recommendation was given thoughtful consideration and that positive measures have been planned to implement the corrective actions. The cooperation and assistance provided during the review by Student Affairs personnel, and staff and stakeholders associated with the Campus Elections Commission, Associated Students, and Graduate Students Association, was sincerely appreciated. If you have any questions, please feel free to contact me.

Respectfully submitted,

Robert Tarsia
Acting Director
Audit and Advisory Services

Enclosure

cc: Chancellor Henry Yang
    Associate Vice Chancellor Ron Cortez
    UCSB Audit Committee
    Senior Vice President and Chief Compliance and Audit Officer Sheryl Vacca
    Dean of Students Yonie Harris
    Campus Elections Commission
    CEC Coordinator Suzanne Perkin
    AS Executive Director Marisela Marquez
    AS President Harrison Weber
    GSA President Diana Anzures

PURPOSE

The primary purpose of the audit was to ensure that appropriate processes and internal controls are in place over University of California, Santa Barbara (UCSB) student elections to ensure compliance with applicable University policies, procedures, and accepted practices.

SCOPE, OBJECTIVES AND METHODOLOGY

The scope of the review was limited to campus student elections conducted during the spring quarters of 2010 and 2011, and the elections processes related to mandatory fee initiatives and the reaffirmation of existing fees. Audit objectives were developed for review of:

- Fee Initiative and Reaffirmation Processes
- Methods and Requirements for Adding Fee Measures to the Ballots
- Ballot Language Review and Approval Processes
- Information Technology (IT) General Controls Over the Voting Website
- Related Policies, Guidelines, Regulations, and Business Practices

The audit objectives included review of practices and procedures in place to ensure that campus student elections are conducted in a transparent and unbiased manner, with the appropriate level of accountability. The primary focus of the audit was on reviewing practices and procedures of the Campus Elections Commission (CEC) in conducting campus-wide elections, as well as the general procedures and requirements of Associated Students (AS) and the Graduate Students Association (GSA) that govern their elections processes. The review included discussions with the Dean of Students and various CEC, AS, and GSA personnel involved in conducting the elections, and limited testing in key areas.

To accomplish our objectives, we obtained an understanding of current University policies, procedures, and regulations related to student elections balloting processes. We reviewed the fee initiative and reaffirmation proposal, petition, and ballot oversight and approval processes and, specifically, the process for ensuring that ballot details and language remains consistent with the initiative and proposal language that qualified the issues for the ballot. We conducted a brief survey to solicit feedback from faculty, staff, and students on the transparency, effectiveness, and efficiency of student elections processes, and conducted a review of general IT controls in place over the official voting website.

BACKGROUND

The yearly campus student elections process for a spring election begins at the end of the previous September and runs through May. Departments and groups (sponsors) wishing to place a mandatory student fee on the spring ballot must choose one of three ballots on which to place their proposed fee, and follow the corresponding rules and processes. The three ballots are each coordinated through the CEC, AS, or GSA. The CEC ballot process is administered in accordance with the UCSB CEC Guidelines, the AS ballot process is governed through the AS Constitution (Election Code) and By-Laws, and the GSA ballot process follows processes outlined in the GSA Constitution and By-Laws.

The CEC was established in February 1987, and includes student, faculty, and staff members with representation from AS, GSA, the Student Fee Advisory Committee, the Chancellor's Staff Advisory Council, the Budget Office, and the CEC Coordinator, a non-voting member designated by the Dean of Students. CEC non-voting advisors include the AS Executive Director and Dean

of the Graduate Division, or their designees. The CEC reports directly to the Chancellor, who has delegated responsibility for oversight of the committee to the Vice Chancellor of Student Affairs.

The charge of the CEC includes making recommendations to the Chancellor on all issues related to campus-wide elections, and centralizing, publicizing, coordinating, and conducting all campus-wide elections. The mission of the CEC is to establish guidelines for conducting campus-wide elections, which includes establishing the calendar and timeline, informing the campus of relevant deadlines, establishing petition requirements, reviewing and approving proposed ballot language in consultation with sponsors and other appropriate parties, and reviewing and responding to allegations of election misconduct. In all matters, the Campus Elections Commission is expected to be a neutral, impartial body.

The CEC administers two types of elections: 1) combined undergraduate and graduate student fees, and 2) undergraduate-only student fees. AS oversees undergraduate student body leadership elections and undergraduate-only student fees, but with different guidelines and thresholds for passage than the CEC. The GSA coordinates only graduate student body leadership position elections and graduate student-only fee initiatives. In recent years, election ballots have been combined into: 1) an undergraduate-only ballot containing CEC undergraduate fee initiatives/reaffirmations, AS officer elections, and AS fee initiatives/ reaffirmations; and 2) a graduate-only ballot containing CEC graduate fee initiatives/ reaffirmations, GSA officer elections, and GSA fee initiatives/reaffirmations.

Sponsors wishing to place a fee initiative on the CEC ballot must file an intent to petition (Intent Form) by a published deadline; the CEC reviews the forms and proposed petition language and sends the sponsors a finalized petition to circulate. The sponsors are given four weeks to collect signatures and must meet a minimum threshold of 15% of the corresponding undergraduate and/or graduate student population. Petition signatures are verified for authenticity by the Vice Chancellor of Student Affairs office through a sampling process established by the CEC.

If enough verified signatures have been collected, sponsors must submit a Proposal Form to the CEC Coordinator by an established deadline during the winter quarter. The CEC then works with the sponsors to refine the ballot language. After approval of the language by the sponsors and CEC, the language must be reviewed and approved by the Dean of Students, University of California Office of the President (UCOP), and UC Legal Counsel. Once all revisions are approved by the required parties, the ballot language is published as a Voter's Guide in campus newspapers. Fees are subject to reaffirmation every four years, unless for a long-term bond or capital project. Reaffirmation sponsors must submit a Reaffirmation Proposal Form to the CEC Coordinator, and the same process for language refinement, approval, and publication used for fee initiatives is followed for fee reaffirmations.

The election runs for four days during the fourth week of spring quarter. Student votes are cast through an online voting website that is administered through the UCSB Social Science Survey Center (SSSC). After the election closes, the SSSC sends data of the results to the AS Computer Technician for review and verification, and he separates out results for each of the three organizations and forwards them to the CEC Chair, CEC Coordinator, and AS and GSA designees. CEC results are then forwarded by the CEC Coordinator to Audit and Advisory Services for review and certification, after which the CEC Chair releases results to the media. After receipt from the AS Computer Technician, AS and GSA are responsible for releasing their ballot results to the media after following their established review and verification practices.

Following the election, the CEC Chair sends a memo to the Chancellor reporting the results, and the Chancellor responds with a memo accepting the results. The CEC then submits Presidential

approval forms to the Chancellor to be forwarded to the Office of the President, and the CEC receives a copy of the memo from the President to the Chancellor approving the results.

SUMMARY OPINION

The audit found no critical weaknesses or major deficiencies in the campus student elections processes and procedures reviewed. Our review also found that ballot language and details for 2010 and 2011 fee initiatives and reaffirmations were consistent from the start of each process (the proposals) through to the petitions (fee initiatives only), original ballot (fee reaffirmations only), publicized ballot, and final online ballot verbiage. This was an area we were specifically asked to include in the scope of our review.

The review did identify significant opportunities to further streamline and improve the accuracy, transparency, accountability, and perceived objectivity of elections practices and procedures. These include consolidating all campus student fee initiative and reaffirmation processes under the CEC process, improving CEC recordkeeping practices and its procedures for validation of election results, and adding or enhancing certain practices and procedures related to the online elections voting website.

Audit observations and management corrective actions are detailed in the remainder of the audit report.

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DETAILED OBSERVATIONS AND MANAGEMENT CORRECTIVE ACTIONS

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A. Consolidated Student Elections

The audit found that student elections fee initiative/reaffirmation processes may not be as transparent as they should be, because they have become complex and burdened with differing rules and requirements.

For example:

- CEC and AS rules limit the undergraduate elections period to 4 days. However, the GSA elections period can run from a minimum of 4 days to a maximum of 12 days, depending on the level of graduate student turnout, and a 20% minimum turnout is required for the election to be valid.

- The petition requirements for placing new fee initiatives on the ballot under the CEC require signatures of at least 15% of each eligible population (graduate and/or undergraduate students). Under AS rules, ballot placement of an initiative requires that the petition contain a 50% plus one majority of the total number of AS members who voted for the AS President in the immediately preceding AS election, along with two-thirds majority approval by the AS Legislative Council.

- The GSA does not have a petition process and requires discussion of the initiative at two GSA Assembly meetings, and two-thirds GSA Assembly approval of the initiative for placement on their ballot.

- In order for a new undergraduate fee initiative to pass, the CEC applies a sliding scale based on several figures, including the five-year average voter turnout, to determine the percentage of voter approval required. AS rules require a 50% plus one majority of AS membership voting for passage of a new undergraduate fee initiative.

- Passage of a new GSA fee initiative requires that the number of GSA members casting votes in favor of the fee exceeds a threshold of 10% of all GSA members, and at least 20% of all GSA members must cast valid votes on the ballot for the results to be valid.

- CEC fees that pass are generally up for reaffirmation every four years; AS fees are generally reaffirmed every two years. The GSA has no formally adopted schedule for reaffirmation of fee initiatives, and these periods have varied in the past based on determination of the GSA Assembly members. In order for a fee that is up for reaffirmation to be repealed, CEC requires a 60% plus one negative vote and AS requires a 50% plus one majority of the total AS members casting votes. The GSA has no formal rules established for repeal of a mandatory fee.

See Table 1 for a comparison of these and other key student elections rules and practices.

These differing rules and practices may allow fee initiative sponsors to pick and choose between the ballot processes, and to choose the process that would best ensure passage of their initiative. Also, many of the individual requirements by themselves may be confusing to student voters and other stakeholders.

Management should consider consolidating all campus student fee initiative and reaffirmation processes under the CEC process, in order to streamline the elections process and improve its transparency and perceived fairness.

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Management Corrective Actions

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The Vice Chancellor for Student Affairs, along with the dean of students, members of CEC, AS, and GSA, will meet to discuss the student fee initiative processes, guidelines, bylaws, and alignment of policies and procedures. Discussions will begin fall quarter 2012 and will continue over the course of the academic year, with decisions regarding streamlining the elections process to be made by June 15, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

B. Transparency and Accountability

1. CEC Recordkeeping Practices

Details of currently active student fees (e.g., proposed fee titles, sponsors, and amounts, election outcome, effective begin/end dates for each fee, and next reaffirmation date) were being maintained in a spreadsheet by the CEC Coordinator for tracking purposes. Although the spreadsheet was accessible by several authorized CEC members, all updates require approval of the CEC Coordinator. The spreadsheet details are the official record used to determine when an active fee requires affirmation.

Additionally, CEC Guidelines require that the data and formulas applied in determining the five-year undergraduate and graduate student voter turnout average, which are used in determining the outcome of mandatory student fee elections, be maintained by Audit and Advisory Services. In practice, these records are maintained by the CEC and provided to Audit and Advisory Services as part of its validation of election results.

In order to improve transparency, recordkeeping practices, and control over the accuracy of fee and election turnout details maintained, the CEC should consider publishing and maintaining all necessary fee, and historical student turnout and calculation formula details, on its website.

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Management Corrective Actions

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The CEC coordinator will publish the details of currently active fees, including: title, sponsor, amount, outcome, begin/end dates and reaffirmation dates on the CEC website. Voter turnout history and formulas used to calculate passage of new initiatives will also be published on the CEC website. This information will be on the website by April 1, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

Table 1	Comparison of UCSB Student Elections Fee Initiative/Reaffirmation Rules and Practices		
Rule/Practice	**CEC**	**AS**	**GSA**
Election Coordination	CEC	AS Elections Committee	GSA Election Committee (ad hoc)
Election Period	Limited to 4 Days	Limited to 4 Days	Minimum of 4 Days to Maximum of 12 Days
Ballot Placement Requirements	CEC Reviews Proposal for Legitimacy; Petition Requirements Met	2/3 Majority Approval of AS Legislative Council	Discussion at 2 GSA Assembly Meetings and 2/3 GSA Assembly Approval
Petition Requirements	15% of Each Eligible Population (Undergraduate and Graduate Students)	50% + 1 Majority (of total number of AS members who voted for the AS President in the immediately preceding AS election)	No Petition Process
Minimum Voter Turnout for Individual Initiative	15% of Eligible Population	15% of Eligible Undergraduate Student Population	10% of all GSA Members
Requirements for Valid Election	Minimum of 20% of Eligible Voters Must Vote (For undergraduate and graduate measures, 20% of combined turnout required)	20% of Registered, Fee-Paying Undergraduate Population	20% of All GSA Members
Passage Requirements – New Fee Initiatives	Sliding Scale [1]	50% + 1 Majority (of AS Membership Voting)	50% + 1 Majority (of GSA Members Voting) plus 10% of all GSA Members Must Vote in Favor for Passage
Removal Requirements - Fee Reaffirmations	60% + 1 Negative Vote to Remove a Mandatory Fee	50% + 1 Majority (of AS Membership Voting)	No Formal Rules Established
Reaffirmation Period	4 Years	2 Years	No Period Formally Established
Oversight of Election Tabulation and Results	CEC	AS Executive Director and Elections Committee Chair	GSA Election Committee Chair
Pronouncement of Election Results	CEC Elections Commission Chair: Releases Results Following Vote Tabulation and Certification by Audit & Advisory Services.	AS Elections Committee Chair: Releases Results Immediately Following Vote Tabulation.	GSA Election Committee Chair: Compiles Results and Announces No Later than 24 Hours After Elections Close.

Source: CEC Guidelines (May, 2010), AS Constitution and By-Laws (FY 2011-12), and GSA Constitution (April, 2003) and By-Laws (June, 2009).

1 The CEC uses a sliding scale to interpret election results that is based on four figures: the total number of eligible voters, a 20% minimum voter turnout, the five-year average voter turnout, and the vote approval percentage. The voter turnout continuum has the 20% minimum turnout at the low end (a 66.67% voter approval is required) and the five-year average turnout (a 50% + one voter approval is required). Thus, any voter turnout between 20% and the five-year average requires a proportionate percentage voter approval between 66.67% and 50% + one.

2. Validation of Election Results

The AS computer technician is responsible for verifying the consistency and reasonableness of the voting results provided directly to him by SSSC, before he parses out respective results to the official CEC, AS, and GSA representatives. CEC guidelines state that the only individuals present during the results tabulation shall be members of the Associated Students Elections Committee, the Campus Elections Commission, and Graduate Student Association, or persons authorized to be present by the parties, and that any conflicts of interest should be taken into consideration.

Also, CEC Election Guidelines require that the elections outcome be validated by Audit and Advisory Services. In practice, Audit and Advisory Services basically ensures that the formulas used in determining the outcome of each CEC fee initiative/reaffirmation are accurate, and that the calculations are performed as required by the guidelines. Audit and Advisory Services subsequently submits a memo to the CEC Chair validating the results.

We suggest that the CEC consider implementing a practice that requires at least one designated representative from the CEC, the AS Elections Commission, and the GSA be present during the entire voting data receipt and tabulation process, and that each designated individual certify by signature that the tabulation process appeared to have been performed in an accurate, impartial, and compliant manner. Additionally, the CEC should consider amending the contract or MOU with the SSSC to require a similar certification for their tabulation process, to be performed prior to submission of the election results to the CEC, AS, and GSA.

We also recommend that the sections of the UCSB CEC Guidelines covering Audit and Advisory Services validation be augmented to specifically provide for additional measures for those cases in which election results are close or controversial. There should be a pre-established mechanism in these cases for the Audit and Advisory Services department to independently obtain, from the online voting website database, additional information and data to be used to validate the results provided by CEC. The CEC Election Guidelines should also establish the process for reaching stakeholder agreement on the scope of any additional validation work required.

Management Corrective Actions

The CEC, AS, and GSA, the three stakeholders in the election that contract with the SSSC, will meet with the SSSC during fall quarter 2012 to discuss the tabulation and verification process and will determine whether or not additional controls are needed for the election results receipt process, and if so, what such controls shall be. Discussions will also include processes for additional verification of close results and mechanisms for Audit and Advisory Services to independently obtain election results for the purposes of validation. If necessary, and upon agreement between the four parties, a revised contract, or an MOU, will be written by April 1, 2013, to document the new agreement.

The CEC will review its current guidelines and determine appropriate revisions for cases of close or controversial results and for reaching stakeholder agreement on the scope of any additional validation work required. Revised guidelines will be in place by April 1, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

C.   Online Voting Website General IT Controls and Transparency

1.   <u>Voting Website Downtime</u>

The CEC Election Guidelines do not address the process for voter accommodations if the voting website were to become inaccessible for an extended period of time due to an unexpected SSSC application, database server, or campus-wide network issue. According to SSSC, in the most likely scenarios only a minimal amount of downtime would be experienced. SSSC uses virtual servers in support of the voting website, and its data backup practices and hardware replacement resources appeared adequate. However, under certain scenarios it could take from 4 to 12 hours or more to restore the website, depending on the server affected. To ensure there is adequate transparency and accountability in these cases, there should be established, agreed-upon protocols for handling such events.

We suggest that specific procedures be included in the CEC Election Guidelines for addressing and approving voter accommodations and extension of the elections period, if the voting website were to become inaccessible for an extended period of time due to an unexpected computer or network issue.

Management Corrective Actions

The CEC will meet and discuss guideline revisions to accommodate any issues with the voting website becoming inaccessible. The CEC will have revised guidelines in place by April 1, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

2.   <u>Voting Website Log-in Page</u>

Students log into the elections website for casting their votes through the official elections website log-in page.[1] The log-in page for the student information systems portal "GOLD" contains a certification banner underneath the fields for entering the student's credentials that states: "*By selecting this checkbox I certify that I am the individual to whom the above credentials were issued. I understand that logging in with another individual's credentials may be grounds for disciplinary and/or legal action.*" The elections website log-in page does not contain a certification statement.

To ensure that student voters are aware of the possible consequences for misuse of their log-in credentials, we suggest that the CEC consider including a certification banner on the log-in page to the Student Elections voting website that is similar to the certification banner on the GOLD log-in page.

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[1] Students may also access the website log-in page after logging in to the Student Affairs' GOLD student information systems portal.

Management Corrective Actions

The CEC will work with AS and the SSSC to see that a certification banner is placed on the log-in page of the ballot. This will be done by April 1, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

3. Voting Website Ballot Verbiage Review and Approval

It is CEC practice for the AS computer technician to coordinate with the CEC, AS, GSA, fee sponsors, and the SSSC to ensure that the final, approved fee initiative and reaffirmation verbiage is contained on the voting website ballots before the site goes live on the first day of the elections period. The computer technician makes multiple requests for proofing and corrections by the required approving parties; however, just one business day before the 2011 elections period began, math errors were inadvertently discovered in the final AS ballot language after it had been reviewed by all required parties. In another case, a GSA fee that was up for reaffirmation was inadvertently omitted from the ballot, which required a separate, special election to be held.

We suggest that CEC consider adopting procedures that require written signature certification from those parties responsible for approving the final ballot language (including sponsors) as a final requirement before the CEC will place the fee initiative or fee reaffirmation on the online ballot.

Management Corrective Actions

The Vice Chancellor for Student Affairs has appointed a new staff position, the campus election compliance officer (CECO). The CECO will serve as an advisor to all three elections committees and will verify that all ballot measures appear correctly on the ballot. The CECO will work with the AS computer technician, the AS advisor to the AS elections committee, the AS elections chair, the GSA advisor, and the GSA elections chair to ensure accuracy of the electronic ballots. Sponsors of initiatives and reaffirmations will be required to verify that they have received a copy of the final ballot language, and will be sent a copy of the online ballot draft to certify that their initiative appears correctly. This new procedure will be in place for the spring 2013 election.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

D. Campus Elections Commission Processes and Practices

1. CEC Meeting Minutes

CEC meeting minutes do not indicate whether the prior meeting minutes were reviewed and approved by the committee, along with any approved modifications. Also, in some cases, the minutes appeared to be abbreviated to an extent that could make it very difficult

for an uninformed reader to discern the committee's discussions and/or actions. The result is inadequate transparency regarding the conduct of these meetings.

To improve transparency, the minutes for each CEC meeting should reflect the committee's review, modification, and approval of the prior committee meeting minutes. The committee should also ensure that the minutes are adequately detailed.

Management Corrective Actions

The CEC meeting minutes will reflect the committee's review, modification, and approval and will be adequately detailed. This will begin with winter quarter 2013 CEC meetings.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

2. Providing Fee Information to the Office of Budget and Planning

The Budget Office staff representative on the CEC is officially responsible for annual reporting of all active student fee details to the Registrar's Office. However, she indicated that she does not always have ready access to current information for the approved fees to timely perform this function.

To ensure that the Registrar's Office is provided the necessary fee information for charging students, the CEC should ensure that the Budget Office representative has ready access to all required details for currently active student fees.

Management Corrective Actions

The CEC will put in a request to the Chancellor's Office that the Budget Office staff representative on the CEC be copied on all presidential approval forms submitted to the Office of the President. This will ensure that the Budget Office staff has notification of all new fees. This request will be made by May 2013. Additionally, as noted above, details of currently active fees will be on the CEC website by April 1, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.

3. Assessment of Administrative Fees

Mandatory new fees and increases to existing fees, both undergraduate and graduate, are subject to an administrative fee established through the Budget Office that is used by the campus to cover the costs associated with collection, accounting, and distribution of the student fees. The administrative fee is applied to all non-capital expenditures of student fee income collected, and the fee rates may be adjusted by campus leadership from year to year due to budget considerations. Because administrative fee rates may be increased subsequent to the approval of student fees, there should be a defined methodology, described in uniform ballot language, that informs student voters of the extent to which approved student fees and fee increases are subject to increases in administrative fees

subsequent to approval. Implementing improved practices in this area would help ensure the fairness and transparency of the student elections process.

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Management Corrective Actions

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The CEC will meet to discuss this issue and will decide on a method of describing to student voters the context and potential changes to the administrative assessment. This language will become the standard for all new ballot initiatives. Such changes will be in place by April 1, 2013.

Audit and Advisory Services will follow up on this corrective action by June 30, 2013, to ensure it has been implemented.