Florida Gulf Coast University Board of Trustees  
January 20, 2015

**SUBJECT:** Testing and Assessment Center Audit

---

**PROPOSED BOARD ACTION**

Accept the Testing and Assessment Center Audit Report provided on October 22, 2014 to President Wilson Bradshaw, Vice President for Student Affairs Mike Rollo, and Director of Counseling and Health Services Jon Brunner.

**BACKGROUND INFORMATION**

This report presents the results of a limited scope audit of the Testing and Assessment Center policies and procedures. The Testing Center operates as an auxiliary unit under Student Affairs to provide testing services to FGCU students, faculty and community members. The audit objectives were to determine whether documented policies and procedures are in place and operating effectively and whether resources appear adequate for the functions of the department.

The audit was part of the 2014 - 2015 internal audit work plan approved by the FGCU Board of Trustees at its June 17, 2014 meeting.

Upon acceptance of the report by the FGCU Board of Trustees, a copy of the report will be sent to the Board of Governors as required.

---

**Supporting Documentation Included:** Testing and Assessment Center Audit Report issued October 22, 2014

**Prepared by:** Director of Internal Audit Carol Slade

**Legal Review by:** Vice President and General Counsel Vee Leonard (October 17, 2014)

**Submitted by:** President Wilson G. Bradshaw
INTEROFFICE MEMORANDUM

To:      Dr. Mike Rollo, Vice President, Student Affairs
         Dr. Jon Brunner, Director, Counseling & Health Services

Cc:      Dr. Wilson Bradshaw, President
         Susan Evans, Vice President & Chief of Staff

From:    Jena Valerioti, Internal Auditor
         Carol Slade, Director, Internal Audit

Date:    October 22, 2014

Re:      Testing and Assessment Center Audit (FINAL REPORT)

Please see the attached final report of the Testing and Assessment Center Audit, which includes the management response. The report is dated October 6, 2014, which is the date Internal Audit received the management response from the Director, Counseling & Health Services Jon Brunner.

On October 17, 2014, Vee Leonard, Vice President & General Counsel, completed a legal review of the audit report.

The audit was performed by Jena Valerioti, Internal Auditor and reviewed by Carol Slade, Director, Internal Audit.
Florida Gulf Coast University
Testing and Assessment Center Audit
Internal Audit Report
Report Date: October 6, 2014
EXECUTIVE SUMMARY

This Report represents a limited-scope audit of the Testing and Assessment Center (Testing Center) policies and procedures. The Testing Center operates as an auxiliary unit under Student Affairs to provide testing services to FGCU students, faculty and community members. As stated in the Testing Center mission statement, “services are provided with dedication to the Professional Standards and Guidelines for Post-Secondary Test Centers through membership in the National College Testing Association (NCTA); membership in the Florida Association of College Test Administrators (FACTA); and participation in the Consortium of College Testing Centers (CCTC).”

In our opinion, Testing Center processes and procedures related to test administration and revenue collection are in place and operating effectively. Notwithstanding, as of the date of this Report, Testing Center management has begun implementing and will continue to deploy additional policies, procedures and controls to provide additional guidance and assurance for operations.

OBJECTIVES

A. Determine whether documented policies and procedures are in place and operating effectively.
B. Determine whether resources appear adequate for the functions of the department.

This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing, issued by the Institute of Internal Auditors. The audit procedures provided a reasonable basis for our opinion and the following reportable observations and recommendations.

AUDIT SCOPE – End of Fieldwork was September 9, 2014.
- Review of the Testing Center policies and procedures
- Review of Testing Center contracts with test companies
- Review of revenue collection processes for a sample selection of three out of 15 exams during the 2013-2014 fiscal year
- Review of Testing Center resources for reasonableness and adequacy

BACKGROUND

The Testing Center has four full-time staff members, two lab proctors and an IT Systems Specialist, whose responsibilities include both the Testing Center and Student Health Services. During the course of the audit, the Director of the Testing Center retired and recruitment efforts were initiated to fill the position.
The Testing Center offers ten standardized exams that are regulated by outside test vendors. For six exams, the Testing Center collects an administrative fee from the testing candidate. For two of those six exams, the Testing Center collects the vendor’s fee in addition to the Testing Center administrative fee. The Testing Center is then billed by the test vendors for payment of the vendor fee. Fees for the remaining four exams are collected by the test vendors who subsequently remit a portion back to the University. In addition to the ten standardized exams, the Testing Center collects an administrative fee from test candidates for two exams that are FGCU department requested tests.

Furthermore, the ACT, the LSAT, and the MPRE are administered on Saturdays, separately from regular Testing Center services. These vendors are responsible for compensating the exam administrators for these exams. The Testing Center staff work as independent contractors of the test vendors to administer these Saturday tests and receive 1099s.

The Testing Center also receives frequent requests for exam proctoring services. These proctoring services are available for students taking distance learning courses though other universities and colleges. Test proctoring services are also available for FGCU students and the general public. These testing candidates are assessed a minimum two hour fee, plus an additional per hour rate for exams exceeding the two hour minimum. These exams do not have pre-approved contracts in place because of the unpredictability of their occurrence. The proctoring process is handled independently of the standard testing process and coordinated by one employee.

Tests are administered in the testing lab comprised of 28 computers. The testing lab is adjacent to the Testing Center Office and is monitored by video cameras. The video feed is viewable during testing hours on monitors at the desks of Testing Center Staff. Testing Center Staff check-in and seat candidates based on instructions from each individual test vendor. Proctors are stationed in the testing lab while candidates take the exams.

**OBSERVATIONS AND RECOMMENDATIONS**

**Objective A**

1. **Department Testing Policy**

   **Condition:** The Testing Center administers tests on behalf of other University departments without a written policy regarding the availability of these services.

   **Criteria:** Written policies should be in place to outline how the Testing Center will accept requests in the provision of departmental tests.

   **Cause:** During the early years of the University, only a small demand for this type of service existed. As the university has grown, so has the demand, but the facilities and staff at the Testing Center are limited. Conflicting needs for the Testing Center's services may occur.
Effect: The Testing Center does not have a policy in place to provide a guideline for determining how request for services are approved.

Recommendation: The Testing Center should establish a policy that outlines the criteria used to accept requests from University departments to administer exams.

Management Response: Testing Center Management agrees with this observation and recommendation. A policy for providing on campus test services is now in place.

Response Provided By: Beverly Brawley, Executive Secretary on behalf of Dr. Jon Brunner, Director of Counseling & Health Services

Person Responsible: Dr. Jon Brunner, Director of Counseling & Health Services

Implementation Date: September 1, 2014

2. DANTES Subject Standardized Test (DSST) Contract

Condition: The Testing Center does not have a signed agreement for the administration of DSST exam. The DSST exam is provided by Prometric, Inc..

Criteria: The Testing Center has contracts in place for the administration of nine of the ten standardized exams offered at the Testing Center. When collaborating with other companies for testing services, contractual agreements should be in place to outline the responsibilities of each party.

Cause: The Testing Center anticipated that the DSST exam was included as part of the CLEP contract. Our audit disclosed that the contract for the CLEP exam does not cover the DSST Exam.

Effect: Because no written agreement exists for this exam, the responsibilities and possible liability of FGCU are unclear and undocumented.

Recommendation: It is recommended that the Testing Center work with Prometric, Inc. and General Counsel to implement a contract for administering the DSST exam.

Management Response: Testing Center Management agrees with this observation and recommendation. We have received the DSST contract. It is currently being reviewed by the University’s General Counsel’s Office.

Response Provided By: Beverly Brawley, Executive Secretary on behalf of Dr. Jon Brunner, Director of Counseling & Health Services

Person Responsible: Dr. Jon Brunner, Director of Counseling & Health Services

Implementation Date: This recommendation is in the process of being implemented.
3. **Proctoring Services: Agreements and Separation of Duties**

*Condition:* The Testing Center frequently receives requests for exam proctoring services. The proctoring services are handled independently of the typical testing process and are coordinated by one employee. A single staff person is responsible for assessing and collecting fees based upon hourly rates. The same person also checks in test candidates.

Moreover, these exams do not have pre-approved agreements on file because the exams and the requesting parties cannot be predicted.

*Criteria:* It is good business practice, when receiving revenue, to separate among employees the duties of collecting, recording, and reviewing.

The Testing Center should have written confirmation that the individual taking an exam understands the policies of the Testing Center.

*Cause:* Due to the small number of staff members, one person was assigned the responsibility for handling all aspects of the service. Staff did not give consideration to the need for separation of duties as well as written agreements for proctoring services as an internal control.

*Effect:* Without a separation of duties between the employee who registers test takers and the employee who collects the exam fees, there is a lack of accountability. An opportunity exists for an incorrect amount of fees to be collected and/or recorded.

Additionally, without a written agreement between the requesting party and the Testing Center, the Testing Center is vulnerable to potential complaints and disagreements regarding fee policies.

*Recommendation:* The Testing Center should establish an Informed Consent Agreement that will be signed by the individual taking the exam. The agreement should include the fees for proctoring services, Testing Center policies and disclose the Center provides no guarantees of uninterrupted use of the facilities. Moreover, the employee who collected the fee should be responsible for documenting, in the student file, evidence that the Testing Center Fee was paid and another employee should review the files to ensure that the appropriate documentation is in each one.

*Management Response:* Testing Center Management agrees with this observation and recommendation. A *Candidate Informed Consent For Proctored Exams* is now in place and another staff member is checking that all proctored exam files include a signed consent form and payment documentation with correct dollar amount(s).

*Response Provided By:* Beverly Brawley, Executive Secretary on behalf of Dr. Jon Brunner, Director of Counseling & Health Services

*Person Responsible:* Dr. Jon Brunner, Director of Counseling & Health Services

*Implementation Date:* September 1, 2014
4. Administering Saturday Tests and Outside Compensation

**Condition:** FGCU facilities are used on Saturdays for administering the ACT and LSAT exams. The testing companies are responsible for compensating the exam administrators. However, position descriptions for two staff members indicate that they will administer the ACT or LSAT on Saturday.

**Criteria:** Administering these exams, for which the employees are compensated by the testing companies, cannot be included in their FGCU job descriptions because they would be compensated from two sources for the same work.

**Cause:** Testing Center staff members are occasionally required to work on Saturdays for reasons other than administering the ACT and LSAT exams. These occasions are a part of their regular FGCU compensated duties. However, administering the ACT and LSAT exams on Saturdays was mistakenly included in employees’ FGCU position descriptions.

**Effect:** As currently written, there appears to be a conflict of interest concerning the Testing Center staff members that administer the ACT and LSAT exams.

**Recommendation:** It is recommended that Testing Center Management work with Human Resources to modify staff position descriptions to remove any requirement that creates or appears to create a conflict of interest and dual compensation.

**Management Response:** Testing Center Management agrees with this observation and recommendation. Testing Center Management is currently working with Human Resources to modify staff position descriptions.

**Response Provided By:** Beverly Brawley, Executive Secretary on behalf of Dr. Jon Brunner, Director of Counseling & Health Services

**Person Responsible:** Dr. Jon Brunner, Director of Counseling & Health Services

**Implementation Date:** This recommendation is in the process of being implemented.

**FOR MANAGEMENT CONSIDERATION**

**Objective B**

The Testing Center has been in its original location in McTarnaghan Hall since 1997. A point of discussion during the audit was a concern regarding the location and size of the Testing Center. McTarnaghan Hall is located adjacent to a student plaza and the Cohen Center. The Testing Center has had issues with noise coming from the plaza as well as the bell tower clock located at the Cohen Center. Surveys completed by testing candidates have indicated testing disruptions from loud music and excessive noise. As an attempt to off-set the noise, the Testing Center offers ear plugs to testing candidates.

Testing Center Management has had to make modifications to their current space over the years as a result of increased demand. Currently, the Director’s office is not a private space. A wall
was added in the office to make space for the IT Specialist. This wall does not reach the ceiling thus reducing privacy for the Director. The Testing Center Director also indicated the need for separate check-in and check-out stations to increase privacy for testing candidates and reduce the noise outside the testing lab. Currently, the limited space in the Testing Center does not allow for this type of modification.

Audit Performed by: Jena Valerioti, Internal Audit
Audit Reviewed by: Carol Slade, Director, Internal Audit