

DELEGATIONS OF AUTHORITY

SAN DIEGO STATE UNIVERSITY

Audit Report 11-25

June 16, 2011

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THE CALIFORNIA STATE UNIVERSITY

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ABBREVIATIONS

AB	Assembly Bill
BOT	Board of Trustees
CO	Office of the Chancellor
CPM	Contracts and Procurement Management
CSU	California State University
DMV	Department of Motor Vehicles
DVBE	Disabled Veteran Business Enterprise
EC	Education Code
EO	Executive Order
GC	Government Code
ICSUAM	Integrated California State University Administrative Manual
PCC	Public Contract Code
PMCP	Policy Manual for Contracting and Procurement
SB	Senate Bill
SDSU	San Diego State University

EXECUTIVE SUMMARY

The Board of Trustees, at its January 2011 meeting, directed that Delegations of Authority be reviewed. The Office of the University Auditor had previously reviewed Delegations of Authority in 2006.

We visited the San Diego State University campus from March 14, 2011, through April 15, 2011, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on delegated activities related to procurement and contracting, motor vehicle inspections, and personal property transactions. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls for delegated activities in effect as of April 15, 2011, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

PROCUREMENT AND CONTRACTING ACTIVITIES [6]

The campus did not consistently obtain evidence of required insurance coverage for service vendors. In addition, the total dollar value of contracts awarded to small businesses was overstated on the fiscal year 2009/10 Small Business contracting activity report. Also, required contractor/vendor certifications were not consistently obtained for the recycled content of commodity purchases.

MOTOR VEHICLE INSPECTIONS AND USE [8]

The campus motor vehicle inspection program did not include an annual analysis of operating costs and did not ensure compliance with all campus and CSU policies and procedures for vehicle use.

LEASE ADMINISTRATION [10]

Campus administration of lease agreements needed improvement. Specifically, the campus did not have a formal delegation of authority in place to address the execution of lease agreements until March 2011, evidence of the approval from the president or designee for the current facility rate schedule of fees could not be provided, and long-term leases were not always executed in a timely manner.

INTRODUCTION

BACKGROUND

In 1986, Senate Bill (SB) 1828 indefinitely extended California State University (CSU) delegations of authority concerning certain procurement and contracting activities, motor vehicle inspections, and real and personal property transactions. The bill's intent was to promote greater economy and efficiency in CSU operations and was expanded by Assembly Bill (AB) 1191 in 1993. SB 1828 also added section 89045(d) to the Education Code (EC):

(d) In addition, the internal audit staff shall perform audits, at least once every five years, of the activities of the CSU pursuant to Sections 89031.5, 89036, 89046, and 89048 of the EC and Section 11007.7 of the Government Code (GC).

EC §89031.5 requires the inspection of all motor vehicles owned by the CSU. Executive Order (EO) 691, *Motor Vehicle Inspections*, dated November 23, 1998, directs each campus to implement a motor vehicle inspection program, specifies eight guidelines that should be included, directs the president to assign the function to an individual, and requires the campuses to notify the Office of the Chancellor (CO) of the individual assigned to the function. CSU policy concerning the use of motor vehicles is codified in *CSU Use of University and Private Vehicles Policy Guidelines*, dated March 2002, issued via Technical Letter 2002-16 from the CO Human Resources department.

EC §89036 grants the CSU authority over certain procurement and contracting activities. EO 775, *Acquisition of Personal Property and Services*, dated June 6, 2001, updates and supersedes prior EOs dating back to 1994 and delegates the procurement authority granted to the CSU under AB 1191 to campus presidents, within the provisions of the *CSU Policy Manual for Contracting and Procurement* (PMCP). EO 760, *Procurement Cards*, dated October 16, 2000, delegates authority for the use of procurement cards to campus presidents.

PMCP, last updated on April 28, 2008, was recently codified in the *Integrated California State University Administrative Manual* (ICSUAM), Section 5000, *Contracts and Procurement*. The ICSUAM establishes systemwide contracting and procurement policy and provides guidance on general procurement practices, along with specific requirements relating to the procurement of goods, services, and information technology resources. Any future updates to contracting policy will be incorporated into the ICSUAM.

EC §89046 granted the CSU the authority to lease state university property for purposes consistent with the functions of the CSU. EO 669, *Leases*, dated May 1, 1997, supersedes an EO issued in 1983. It delegates to campus presidents the authority to execute leases of real property as either lessor or lessee without approval by the CO, subject to certain limitations. The EO requires the use of standard provisions from model lease agreements, an assessment of liability risk for each lease agreement, a competitive process for leasing state university property to for-profit enterprises, an accounting of leases in the campus financial records, and maintenance of a central repository for all current lease agreements.

EC §89048 addresses a number of areas, including certain real property transactions and the sale or exchange of personal property. State University Administrative Manual §9018, *Acquisition and*

Granting of Easements and Acceptance of Quitclaims, sets forth processing guidelines and responsibilities for such real property transactions by the campuses and by the land records staff in the CO Capital Planning, Design and Construction department.

EO 409, *Purchase, Sale, Lease, and License of Personal Property*, dated January 5, 1983, delegates to campus presidents the authority to sell or exchange personal property and has been superseded except for Item B, which permits the sale or exchange of personal property when the campus president determines that it is in the best interest of the CSU and the transaction is based on fair market value.

GC §11007.7 addresses the procurement of insurance or official bonds. However, this section is not applicable to insurance procured by the CSU. CSU policy for insurance is codified by EO 849, *CSU Insurance Requirements*, dated February 5, 2003. It sets forth minimum insurance limits and holds harmless provisions for agreements, contracts, and purchases.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of delegated activities related to procurement and contracting, motor vehicle inspections, and real and personal property transactions and to determine the adequacy of controls over related processes to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- ▶ Administration of procurement activities incorporates effective internal controls, adequate local policies and operational procedures, current written delegations, and observance of good business practices in compliance with CSU policy.
- ▶ CSU competitive bidding requirements are adhered to in the procurement of goods and services, and CO approval is received prior to the purchase of restricted items.
- ▶ The responsibility for the execution of low-value purchases is properly delegated and methods for such execution are adequately controlled, and campus use of procurement cards is appropriate.
- ▶ Efforts are made to meet Small Business, Disabled Veteran Business Enterprise (DVBE), and Buy Recycled goals; purchasing preferences are properly granted; and Small Business, DVBE, and Buy Recycled reporting is timely, accurate, and supportable.
- ▶ Purchase agreements are properly executed and include required conditions, provisions, certifications, and insurance requirements, and Department of Fair Employment and Housing contract notification requirements are met.
- ▶ The campus motor vehicle inspection program and the use of CSU-owned vehicles comply with CSU policies, and a vehicle inspector has been designated.
- ▶ Leasing activities are adequately controlled and comply with CSU policy and state regulations, and leases are properly executed.
- ▶ Easements, rights-of-way, and quitclaims have been correctly acquired, and the sale or exchange of personal property complies with CSU policy and the EC.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Action Item, Agenda Item 2 of the January 25 and 26, 2011, meeting of the Committee on Audit stated that a review of Delegations of Authority would include, but was not limited to, a review of certain purchasing and contracting activities; motor vehicle inspections and use; agreements and leases; easements, rights-of-way, and quitclaim transactions; and the sale and exchange of personal property. Delegations of Authority is a mandated audit and is required by the EC at least once every five years.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*, issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit focused on procedures in effect from July 1, 2009, through December 31, 2010.

We focused primarily upon the internal administrative, compliance, and operational controls over delegation of authority and contracting activities, motor vehicle inspection, and real and personal property transactions. Specifically, we reviewed and tested:

- ▶ Specific purchasing and contracting activities, delegations, and limitations.
- ▶ Bidding procedures and exceptions.
- ▶ Low-value purchase methods and controls.
- ▶ Granting of purchase preferences.
- ▶ Preparation of Small Business, DVBE, and Buy Recycled reports and goal attainment.
- ▶ Execution of lease agreements.
- ▶ Motor vehicle inspection and use policies and controls.
- ▶ Easements, rights-of-way, and quitclaims and the sale or exchange of personal property.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PROCUREMENT AND CONTRACTING ACTIVITIES

INSURANCE REQUIREMENTS

The campus did not consistently obtain evidence of required insurance coverage for service vendors.

We reviewed 23 transactions for the procurement of services and found that insurance coverage documentation was not obtained for three service vendors who conducted business on campus.

Executive Order (EO) 849, *California State University Insurance Requirements*, dated February 5, 2003, requires vendors to show evidence of adequate insurance coverage by furnishing a certificate of insurance and specifies minimum insurance coverage requirements.

Integrated California State University Administrative Manual (ICSUAM) §5230.0, *Insurance Requirements*, states that evidence of insurance is required for any campus or auxiliary organization contract involving any activity that puts the state, the California State University (CSU), or the campus at risk. It provides minimum insurance requirements for agreements where services are being performed on campus, for short-term licenses issued by the campus or auxiliary for on-campus events, and for contracts involving campus facilities and property leases. It further states that when insurance is required, vendors must be required to show evidence of insurance coverage by furnishing a certificate or certificates of insurance that include additional insured endorsements that meet specific requirements, including naming the State of California, the Trustees of the CSU, and the campus as additional insured.

The contract and procurement manager stated that the contract and procurement management department (CPM) was working with the service contractors to obtain the insurance certificates; however, some certificates were not on file due to oversight. She also stated that CPM's practice is to either terminate the contract or advise the contractor to cease services until the insurance certificate is provided.

Failure to obtain evidence of required insurance coverage increases the campus' exposure to liability.

Recommendation 1

We recommend that the campus obtain evidence of required insurance coverage for all service vendors in accordance with CSU insurance requirements.

Campus Response

We concur. The campus has obtained evidence of required insurance coverage for all service vendors.

SMALL BUSINESS PARTICIPATION

The total dollar value of contracts awarded to small businesses was overstated on the fiscal year 2009/10 Small Business contracting activity report.

We found that one vendor included in the report had an expired small business certificate for the reporting period. Consequently, the campus overstated small business purchases by \$547,369.

Government Code (GC) §14835 states that in order to comply with the requirements of the Small Business Procurement and Contract Act, the CSU must report to the Office of Small Business and Disabled Veteran Business Enterprise Services annually on the number and amount of contracts and purchase orders awarded to small businesses.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

The contract and procurement manager stated that the campus had inadvertently failed to update the small business expiration date in its Oracle system.

Failure to correctly determine small business certification status increases the risk of reporting errors and increases the risk of non-compliance with state legislation.

Recommendation 2

We recommend that the campus correctly report the total value of contracts awarded to small businesses on the Small Business contracting activity report.

Campus Response

We concur. The campus has revised its process and will correctly report the value of contracts awarded on the Small Business contracting activity report.

STATE AGENCY BUY RECYCLED CAMPAIGN

Required contractor/vendor certifications were not consistently obtained for the recycled content of commodity purchases.

Public Contract Code (PCC) §12205 states that contractors shall be required to certify in writing the minimum percentage, if not the exact percentage, of post consumer and secondary material in the materials, goods, or supplies provided or used. This certification shall be furnished under penalty of perjury. The certification shall be provided regardless of content, even if the product contains no recycled materials.

The contract and procurement manager stated that a significant portion of recycled goods reported by San Diego State University (SDSU) were purchased using the Office Max online ordering system, which complies with PCC §12205. She further stated that the failure to obtain certifications on other recycled content purchases was due to management oversight.

Failure to consistently obtain contractor certifications for the recycled content of commodity purchases increases the risk of non-compliance with state regulations and inaccurate recycled content reporting.

Recommendation 3

We recommend that the campus consistently obtain required contractor/vendor certifications for the recycled content of commodity purchases.

Campus Response

We concur. The campus has obtained the required contractor certifications for the recycled content of commodity purchases.

MOTOR VEHICLE INSPECTION AND USE

MOTOR VEHICLE INSPECTION PROGRAM

The campus motor vehicle inspection program did not include an annual analysis of operating costs.

EO 691, *Motor Vehicle Inspections – Delegation of Authority*, dated November 23, 1998, states, in part, that each campus motor vehicle inspection program must include an annual analysis of operating costs.

The physical plant associate director stated that maintenance cost data was recorded and retained, but the data was not analyzed because the maintenance was considered routine.

Failure to perform an annual analysis of operating costs increases the risk of cost inefficiencies and increases the possibility that vehicle costs and repairs performed will exceed the value of campus vehicles.

Recommendation 4

We recommend that the campus update the motor vehicle inspection program to include an annual analysis of operating costs.

Campus Response

We concur. The campus will update its program to include an annual review of operating costs by November 30, 2011.

VEHICLE USE CONTROLS

The campus motor vehicle inspection and use program did not ensure compliance with all campus and CSU policies and procedures for vehicle use.

Specifically, we found that:

- ▶ Campus policies did not require departments with custody of university-owned vehicles to develop and implement a documented method to control and monitor the use of the vehicles, and vehicle logs were not consistently maintained. Although certain areas monitored vehicle use via vehicle logs, this was not consistent throughout the campus.
- ▶ For nine of the ten drivers whose records we reviewed, the campus did not maintain authorization forms that included certification statements regarding the employee's driving record and possession of a valid driver's license.
- ▶ For two of the ten drivers reviewed, the campus could not provide evidence of a Department of Motor Vehicles (DMV) record check.

SDSU *Defensive Driving* guidelines state that employees must have a supervisor's permission to operate any vehicle on university business. They also state that approval to operate a vehicle on university business is contingent on possession of a valid California Driver's License, not having received more than three moving violations and/or accidents or combination thereof in the past twelve months, and entry into the DMV Employer Pull Notice Program, among other requirements.

CSU Use of University and Private Vehicles Policy Guidelines, dated March 2002, state that university vehicles shall only be used in the conduct of university business, and that the campus must establish one point of control to control usage in accordance with federal, State of California, CSU, and campus laws, regulations, policies, and procedures. In addition, these guidelines set criteria for usage of state-owned vehicles, including requirements that: Written approval of the use has been given by an individual authorized by the president to grant such approval; employee certification regarding possession of a valid driver's license and driving record is obtained; the campus has requested a copy of the person's driving record from the DMV at least once every four years; and monthly logs must be filled in completely for each trip, regardless of the duration, miles driven, or the purpose of the trip.

The physical plant director stated that the failure to monitor the use of university-owned vehicles outside of plant operations was due to oversight. The director of auxiliary services, public safety, stated that certification statements had been obtained for the employees noted, but the documents had

been purged by mistake. Further, she stated that although DMV checks had been performed for the two employees noted, the documents had been purged by mistake.

Failure to adequately control the use of university-owned vehicles increases the risk of exposure to unforeseen liabilities and unqualified drivers and the use of vehicles for unauthorized activities.

Recommendation 5

We recommend that the campus:

- a. Require all departments with custody of university-owned vehicles to develop and implement a method to control and monitor the use of state-owned vehicles, and require the use of vehicle logs.
- b. Maintain authorization forms for employees who use state-owned vehicles that include certification statements regarding the employee's driving record and possession of a valid driver's license.
- c. Maintain evidence of DMV record checks for all employees who use state-owned vehicles.

Campus Response

We concur. The campus will:

- a. Require usage logs for monitoring state-owned vehicles. Usage logs will be implemented by November 30, 2011.
- b. Maintain employee authorization forms, which include certification statements regarding the employee's driving record and proof of a valid driver's license. This will be completed by November 30, 2011.
- c. Maintain evidence of DMV record checks for employees who use state-owned vehicles. This will be completed by November 30, 2011.

LEASE ADMINISTRATION

Campus administration of lease agreements needed improvement.

We found that:

- ▶ The campus did not have a formal delegation of authority in place to address the execution of lease agreements until March 2011.

- ▶ The campus could not provide evidence that the president or designee had approved the current facility rate schedule of fees charged for the short-term leasing of state facilities.
- ▶ Three of the six long-term leases of state land and buildings we reviewed were not executed in a timely manner. Specifically, they were signed by the university subsequent to the start of the lease period.

EO 669, *Leases*, dated April 21, 1997, delegates the authority to execute leases of real property as either lessor or lessee to the campus president or designee, subject to certain exceptions.

Standing Orders of the CSU Board of Trustees (BOT) §II.i and §VI.f state that the chancellor has the authority to establish and oversee campus fees; establish, adjust, and oversee systemwide fees subject to overall direction of the BOT; and the campus president is authorized to oversee and adjust campus fees. Presidents may delegate their authority to other officials on their campuses.

The contract and procurement manager stated that the president's delegation to business and financial affairs was intended to provide full authority for all contract and procurement documents, including leases, but a typographical error on the delegation letter omitted reference to EO 669, and consequently a revised lease delegation authorization was issued in March 2011. Further, she stated that the leases noted were signed subsequent to the start of the contract term because the routing of agreement documents for signature exceeded the anticipated processing time. The associate vice president for financial operations stated that the lack of documentation for the facility rate schedule was due to oversight.

Failure to properly delegate lease administration responsibilities increases the risk of inappropriate and inconsistent processing of lease contracts and administration, and inadequate controls over the leasing of state facilities increases the risk of invalid or incomplete facility-use agreements and the risk of inappropriate rentals, unapproved rental fees, and lost fee revenue.

Recommendation 6

We recommend that the campus:

- a. Maintain current delegations of authority for the execution of lease agreements.
- b. Obtain approval from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities.
- c. Execute lease agreements in a timely manner.

Campus Response

We concur.

- a. The delegation of authority for the execution of lease agreements has been updated and will be kept current.
- b. The campus will obtain approval, by November 30, 2011, from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities.
- c. The campus has revised its process to ensure that lease agreements will be executed in a timely manner.

**APPENDIX A:
PERSONNEL CONTACTED**

<u>Name</u>	<u>Title</u>
Stephen Weber	President
Cathleen Austin	Accounts Payable Manager
Chris Bronsdon	Financial Reporting Director
Scott Burns	Associate Vice President, Financial Operations
Valerie Carter	Audit and Tax Director
Lauren Cooper	Facilities Planning, Design and Construction Director
David del Rio	Assistant Director, Business Services
Johnny Eaddy	Physical Plant Associate Director
John Ferris	Physical Plant Director
Cathy Garcia	Contract and Procurement Manager
Kathi Glenn	Administrative Support Coordinator, Business Services
Lorretta Leavitt	University Controller and Interim Director, Budget and Finance
Debbie Richeson	Director of Auxiliary Services, Public Safety
Sally Roush	Vice President, Business and Financial Affairs

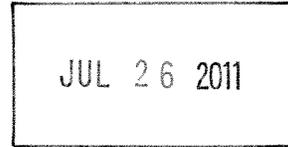


SAN DIEGO STATE
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Sally Roush
Vice President

RECEIVED
UNIVERSITY AUDITOR



THE CALIFORNIA STATE
UNIVERSITY

July 26, 2011

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802

Dear Mr. Mandel:

Attached is San Diego State University's response to Audit Report 11-25, *Delegations of Authority*. Documentation of policy and control changes will follow under separate cover.

Should you have any questions or require additional information, please contact Valerie Carter, Audit and Tax Director, at 619-594-5901.

Sincerely,



Sally F. Roush
Vice President, Business and Financial Affairs

Attachment

c: Elliot Hirshman, President
Scott Burns, Associate Vice President, Financial Operations
Robert Schulz, Associate Vice President, Operations
Valerie Carter, Director, Audit and Tax

**DELEGATIONS OF AUTHORITY
SAN DIEGO STATE UNIVERSITY**

Audit Report 11-25

PROCUREMENT AND CONTRACTING ACTIVITIES

INSURANCE REQUIREMENTS

Recommendation 1

We recommend that the campus obtain evidence of required insurance coverage for all service vendors in accordance with CSU insurance requirements.

Campus Response

We concur. The campus has obtained evidence of required insurance coverage for all service vendors.

SMALL BUSINESS PARTICIPATION

Recommendation 2

We recommend that the campus correctly report the total value of contracts awarded to small businesses on the Small Business contracting activity report.

Campus Response

We concur. The campus has revised its process and will correctly report the value of contracts awarded on the Small Business contracting activity report.

STATE AGENCY BUY RECYCLED CAMPAIGN

Recommendation 3

We recommend that the campus consistently obtain required contractor/vendor certifications for the recycled content of commodity purchases.

Campus Response

We concur. The campus has obtained the required contractor certifications for the recycled content of commodity purchases.

MOTOR VEHICLE INSPECTION AND USE

MOTOR VEHICLE INSPECTION PROGRAM

Recommendation 4

We recommend that the campus update the motor vehicle inspection program to include an annual analysis of operating costs.

Campus Response

We concur. The campus will update its program to include an annual review of operating costs by November 30, 2011.

VEHICLE USE CONTROLS

Recommendation 5

We recommend that the campus:

- a. Require all departments with custody of university-owned vehicles to develop and implement a method to control and monitor the use of state-owned vehicles, and require the use of vehicle logs.
- b. Maintain authorization forms for employees who use state-owned vehicles that include certification statements regarding the employee's driving record and possession of a valid driver's license.
- c. Maintain evidence of DMV record checks for all employees who use state-owned vehicles.

Campus Response

We concur. The campus will:

- a. Require usage logs for monitoring state-owned vehicles. Usage logs will be implemented by November 30, 2011.
- b. Maintain employee authorization forms, which include certification statements regarding the employee's driving record and proof of a valid driver's license. This will be completed by November 30, 2011.
- c. Maintain evidence of DMV record checks for employees who use state-owned vehicles. This will be completed by November 30, 2011.

LEASE ADMINISTRATION

Recommendation 6

We recommend that the campus:

- a. Maintain current delegations of authority for the execution of lease agreements.
- b. Obtain approval from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities.
- c. Execute lease agreements in a timely manner.

Campus Response

We concur.

- a. The delegation of authority for the execution of lease agreements has been updated and will be kept current.
- b. The campus will obtain approval, by November 30, 2011, from the president or designee for the current facility rate schedule of fees charged for the short-term leasing of state facilities.
- c. The campus has revised its process to ensure that lease agreements will be executed in a timely manner.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

August 22, 2011

CHICO

MEMORANDUM

DOMINGUEZ HILLS

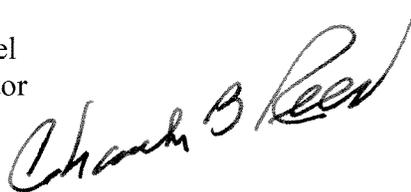
EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

SUBJECT: Draft Final Report 11-25 on *Delegations of Authority*,
San Diego State University

LONG BEACH

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of August 22, 2011, I accept the response as submitted with the draft final report on *Delegations of Authority*, San Diego State University.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/amd

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS