OMB CIRCULAR A-133 SINGLE AUDIT REPORT JUNE 30, 2013

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Independent Auditors' Report On Internal Control Over Financial Reporting And On Compliance And Other Matters Based On An Audit Of Financial Statements Performed In Accordance With

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Independent Auditors' Report On Internal Control Over Financial Reporting And On Compliance And Other Matters Based On An Audit Of Financial Statements Performed In Accordance With Government Auditing Standards

Board of Governors University of Central Missouri Warrensburg, Missouri

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards—issued by the Comptroller General of the United States, the financial statements of the University of Central Missouri (the University) as of and for the year ended June 30, 2013, and the related notes to the financial statements, which collectively comprise the University's basic financial statements, and have issued our report thereon dated October 14, 2013.

#### Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the University's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the University's internal control. Accordingly, we do not express an opinion on the effectiveness of the University's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified. We did identify certain deficiencies in internal control described in the accompanying Schedule of Findings and Questioned Costs that we consider to be a significant deficiency as item 2013-01.

#### **Compliance And Other Matters**

As part of obtaining reasonable assurance about whether the University's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under Government Auditing Standards .

#### University Of Central Missouri's Response To Finding

The University's response to the finding identified in our audit is described in the accompanying Schedule of Findings and Questioned Costs. The University's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

#### Purpose Of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the University's internal control or on compliance. This report is an integral part of an audit performed in accordance with Government Auditing Standards in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

October 14, 2013

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we identified certain deficiencies in internal control over compliance, as described in the accompanying Schedule of Findings and Questioned Costs as items 2013-2 through 2013-15, that we consider to be significant deficiencies.

The University's responses to the internal control over compliance findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs. The University's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

Report On Schedule Of Expenditures Of Federal Awards Required By OMB Circular A-133

We have audited the basic financial statements of the University as of and for the year ended June 30, 2013, and have issued our report thereon dated October 14, 2013, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and

#### SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS For The Year Ended June 30, 2013

Federal Grantor/ Pass-Through Grantor/ Program Or Cluster Title  U.S. Department Of Education	Federal CFDA Number	Pass-Through Entity Identifying Number	Federal Expenditures
Student Financial Aid Cluster -Direct TEACH Grants Federal SEOG Federal Work Study Federal Pell Grants Federal Direct Student Loans Federal Perkins Loan Total Student Financial Aid Cluster - Direct	84.379 84.007 84.033 84.063 84.268 84.038		\$ 140,306 80,000 280,969 15,610,274 68,158,972 977,586 85,248,107
TRIO Cluster - Direct Student Support Services McNair Central Achievers Program Total TRIO Cluster - Direct	84.042 84.217		350,792 245,218 596,010
Passed Through Missouri Department Of Elementary And Secondary Education Migrant English Language Learning - Indirect	84.011	unknown	176,723
Special Education Cluster (IDEA) - Indirect Special Education Consultants - RPDC RTI Implementation Support Total IDEA Cluster - Indirect	84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027	unknown unknown unknown unknown unknown unknown unknown	75,000 983 1,000 9,925 99,780 100,000 275,000 93,606 655,294
Passed Through Missouri Coordinating Board For Higher Education Middle School Math Mastery - Indirect	84.367	Cycle 9 ITQG	8,557

## SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (Continued) For The Year Ended June 30, 2013

Federal Grantor/ Pass-Through Grantor/ Program Or Cluster Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Fe Expend	ederal itures
U.S. Department Of Transportation				
Highway Safety Cluster - Direct				
NHTSA Central Region Diversity Outreach Liaison	20.600			10,496
NHTSA Central Region Law Enforcement Liaison	20.600			59,834
Total Highway Safety Cluster - Direct				70,330
Passed Through Missouri Division Of Highway Safety				
Airport Improvement Program - Indirect	20.106	#12-019A-1		19,911
Highway Safety Cluster - Indirect				
Driver Improvement Program	20.600	#12-DE-02-006		2,642
Crash Investigation Training	20.600	#12-AI-04-001		21,960
CIOT Enforcement	20.600	#12-OP-05-005		(6,864)
Statewide Seat Belt Survey	20.600	#12-OP-05-004		9,770
Teen (High SchoT5.1(g).3.2535 [#12)7.6(-OP)-8S		#12-OP-15-004		2

## SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (Continued ) For The Year Ended June 30, 2013

Federal Grantor/ Pass-Through Grantor/ Program Or Cluster Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Ex	Federal penditures
Passed Through Missouri Department Of Transportation National Motor Carrier Safety - Indirect	20.218	unknown	\$	44,949
Total U.S. Department Of Transportation			\$	1,631,755
U.S. Department Of Health And Humans Services				
NIOSH/IPA - Direct	93.362		\$	24,750

U.S. Small Business Administration

Passed-Through The e the accompanying notes to schedule ofnmisefBT[U. Tw[4(E3Bn0057 Tiv)2(n)w[4(Er54 61sit10(3d)12(n)8.7

## SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (Continued ) For The Year Ended June 30, 2013

Federal Grantor/ Pass-Through Grantor/ Program Or Cluster Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Exp	Federal penditures
U.S. Department Of Justice Passed Through Missouri Department Of Public Safety Enforcing Underage Drinking Laws Project	16.727 2	2009-EUDL-AF-01	\$	166,904
Body Armor	16.738	2011-LLEBG-072		8,640
Total U.S. Department Of Justice			\$	175,544
U.S. Department Of Housing And Urban Development Passed-Through Missouri Department Of Economic Development Community Development Block Grant Program JCEDC Missouri Innovation Campus	14.228	2008-DI-93	\$	19,673
U.S. Environmental Protection Agency Passed-Through Childrens Mercy Hospital CMH Air quality	66.034	12-0003	\$	5,000
Passed-Through Missouri Department Of Natural Resources MO Wetland Rapid Assessment Method & Education Outreach	66.461	CD-97738401		24,198

Total U.S.nm5W-91 0 TD.005.6(nt.)-15i Gran nmn Ouahron(u).8(6(.)-15(nP))1 i o.n Ou3hroc9.3(sge)104(u)15.6(n(c).)-15-6.(

NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS June 30, 2013

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS For The Year Ended June 30, 2013

Soction I Summary Of Auditors Deculte	
Section I - Summary Of Auditors' Results	
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Financial Statements

Type of auditors' report issued: <u>Unmodified</u>

Internal control over financial reporting:

y Material weakness(es) identified? yes x no y

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

### Section II - Financial Statement Findings

Finding: 2013-01 - Significant Deficiency (Repeat of 2012-2)

Criteria Or Specific Requirement: Lack of segregation of duties related to the payroll process.

Condition: Within the payroll cycle, the Payroll Director, Payroll Specialist and other employees perform or have the ability to perform virtually all access, recording and monitoring functions.

Cause: Segregation of duties issues arise due to limited staff in the Payroll department and the need for multiple staff to have duplicative access in order to back up other staff in the case of absences.

Effect: The potential for misappropriation of University assets exists due to the lack of segregation of duties.

Recommendation: We recommend that the Payroll department review and where appropriate limit access that will help prevent or deter a misappropriation of assets.

Corrective Action Plan: The Office of Payroll Services is a small operation. With three full-time employees, it is essential that staff be cross-trained and have the ability to perform duties required to assist customers and support administrative requests during the usual course of business where absenteeism (planned and unplanned) is a reality.

The Payroll Director and the Payroll Specialist have the ability to perform virtually all system processes, recording and monitoring functions. Financial resources are not available to allow further segregation of these responsibilities; however, there are counter measures in place to reduce potential fraud and mismanagement of assets.

#### Segregation:

x Employees enter hours on electronic time sheet for each pay period. Supervisor approval is required for non-exempt hours to process.

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

x In April of 2013, the University implemented an Electronic Personnel Action Form (EPAF) process for hiring student employees effective for the summer of 2013 and beyond. The EPAF allows University departments to complete the process of hiring student employees electronically, and allows the Office of Human Resources to electronically approve the job assignments and apply them directly to Banner. The Office of Payroll Services no longer enters student job assignments in Banner.

#### Corrective Action Plan:

x The University is in the process of creating an audit report that will identify any changes made by the payroll staff, system generated changes, and/or unauthorized user changes affecting an employee's pay record. Banner currently does not provide an audit report with these capabilities. Our technology staff has made progress towards developing the report and our goal is to have the report functional in fiscal year 2014. Ideally, the report will be sent to and reviewed for inconsistencies and discrepancies by personnel in areas outside of Payroll Services, most likely Accounting Services.

Responsible Official: Tena Duncan, Payroll Director

Expected Date of Completion: 6/30/2014

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Corrective Action Plan: Office of Sponsored Programs and Research Integrity (OSPRI) Office of Sponsored Programs and Research Integrity (OSPRI) has implemented a new electronic tool that not only sends email reminder notices of due dates on deliverables to principal investigators and other responsible personnel (previously handled by the GrantLink system), but now sends ongoing email notifications until the deliverables are submitted. The corrective action of the new tool was not fully implemented due to vacations, changes in personnel, and other circumstances. Deliverable due dates have been transferred/input in the new tool.

Responsible Official: Janice Putnam, Interim Director OSPRI

Expected Date Of Completion: November 1, 2013

Corrective Action Plan: Broadcasting Services

In an effort to provided KMOS-TV's viewing audience with the quality of local and national programs associated with public broadcasting in the mandated broadcast format, KMOS-TV pursued and was awarded this digital transition grant. The challenge involved with this effort was meeting all the reporting requirements with a reduced workforce. KMOS-TV has been without a director for two years. Two members of the station's workforce have served as interim director during this time period. While performing the director's duties, they continued to cover their own duties. The first interim retired leaving two sets of duties to be covered by others. Reporting requirements were part of these duties. During this same period, the station's engineering department has had to adjust to a decrease and then change of personnel. Finding an opportunity to unite all personnel required to complete a substantiated performance report became a challenge. Fulfilling the physical requirements of the grant, while continuing to keep the station broadcasting, delayed performance reporting.

The Standard Form 425, Federal Financial Report delay can be attributed to this same reduction in workforce. The University is in the final stages of starting a national search for a new station director.

Responsible Official: Sarah R. Bailey, Broadcasting Services Operations Manager

Expected Date Of Completion: January 1, 2014

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-03 - Significant Deficiency

Federal Award No. 10.861 Public Television Station Digital Transition Grant

Criteria: According to OMB Circular A-133, "When a non-federal entity enters into a covered transaction with an entity at a lower tier, the non-federal entity must verify that the entity is not suspended or debarred or otherwise excluded. This verification may be accomplished by checking the Excluded Parties List System (EPLS) maintained by the General Services Administration (GSA), collecting a certification from the entity, or adding a clause or condition to the covered transaction with that entity (2 CFR section 180.300)".

Condition: RubinBrown tested one contract, which was the only contract entered into during FY 2013. RubinBrown was unable to verify that the University performed a verification check for covered transactions, by checking the EPLS, collecting a certification from the entity, or adding a clause or condition to the contract to ensure that the covered transactions were not awarded to suspended or debarred parties.

Effect: There is a risk that the contract could have been awarded to suspended or debarred parties. The effects of this condition is that the University could lose funding for not performing a verification check for covered transactions.

Questioned Costs: There are no questioned costs for this finding. RubinBrown reviewed EPLS to ensure that the contractor has not been suspended or debarred at the time of the award.

Cause: The University does not have any current policies or related controls in place requiring verification that the entity they are contracting with is not suspended or debarred.

Recommendation: RubinBrown recommends that the University implement policies and procedures requiring a certification to be provided by the contracted entity verifying that they are not suspended or debarred, or add a clause or condition to the contract certifying that the contracted entity is not suspended or debarred.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

 $\label{thm:management} \mbox{Corrective Action Plan: Management agrees the policy should be revised, outlining the requirement for certification to be provided by$ 

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-04 - Significant Deficiency

Federal Award No. 47.082 Renovation of Research Space - ARRA

Criteria: According to OMB Circular A-133, "Section 1512 of the Recovery Act requires reporting on the use of Recovery Act funding by recipients.....the recipient reports are required to include the following detailed information: Total amount of funds received; and of that the amount spent on projects and activities".

Condition: Of the two ARRA 1512 reports tested, one did not report the correct amount of "Total Federal Amount of ARRA Funds Received/Invoiced" or "Total Federal Amount of ARRA Expenditures" as recorded in the General Ledger.

Effect: The National Science Foundation was not properly apprised of the program's performance. Because the program was completed prior to the June 2013 report, no future funds are expected to be received related to this program.

Questioned Costs: No questioned costs were identified.

Cause: The University does not have current policies or related controls in place to ensure that ARRA reports are submitted accurately.

Recommendation: It is recommended that the University implement processes and controls to ensure that reports are accurate before being submitting.

Corrective Action Plan: Management concurs with this finding. The ARRA report in question was completed by the Interim Director of OSPRI. In completing the form there were fields that were auto populated from the previous quarter report and did not reflect updates made to other fields. In the future, OSPRI staff will complete required reports and have the Director of OSPRI review the reports for accuracy prior to submission.

Responsible Official: Janice Putnam, Interim Director OSPRI

Expected Date Of Completion: September 1, 2013

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-05 - Significant Deficiency

Federal Award No. 47.082 Renovation of Research Space - ARRA

Criteria: According to OMB Circular A-133, "When a non-federal entity enters into a covered transaction with an entity at a lower tier, the non-federal entity must verify that the entity is not suspended or debarred or otherwise excluded. This verification may be accomplished by checking the Excluded Parties List System (EPLS) maintained by the General Services Administration (GSA), collecting a certification from the entity, or adding a clause or condition to the covered transaction with that entity (2 CFR section 180.300)".

Condition: RubinBrown tested one contract, which was the only contract entered into during FY 2013. RubinBrown was unable to verify that the University performed a verification check for covered transactions, by checking the EPLS, collecting a certification from the entity, or adding a clause or condition to the contract to ensure that the covered transactions were not awarded to suspended or debarred parties.

Effect: There is a risk that the contract could have been awarded to suspended or debarred parties. Effects of this condition are that the University could lose funding for not performing a verification check for covered transactions.

Questioned Costs: There are no questioned costs for this finding. RubinBrown reviewed EPLS to ensure that the contractor has not been suspended or debarred at the time of the award.

Cause: The University does not have current policies or related controls in place requiring verification that the entity they are contracting with is not suspended or debarred.

Recommendation: RubinBrown recommends that the University implement policies and procedures requiring a certification to be provided by the contracted entity verifying that they are not suspended or debarred, or add a clause or condition to the contract certifying that the contracted entity is not suspended or debarred.

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Corrective Action Plan: Management agrees the policy should be revised, outlining the requirement for certification to be provided by the contracted entity verifying that they are not suspended or debarred. The Director of Procurement and Materials Management will evaluate and establish Procurement policies and procedures for the certification requirement. The following changes will be implemented:

- x A standard checklist will be used for all formal bid solicitations that includes acknowledgement of the Buyer of Record (initials and date) that the Excluded Party Listing System (EPLS) was verified and that the entity or agency is not currently debarred or suspended.
- x Standard Terms and Conditions of Procurement document templates will be updated, and additional language will be added immediately preceding the signature line of each solicitation, whereby the vendor/contractor certifies that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in the transaction (contract) by any governmental department or agency.

Responsible Official: Lisa Butler, Director Procurement & Materials Management

Expected Date Of Completion: The standard checklist was implemented September 1, 2013. A formal update to the Procurement Policies and Procedure Manual with full review and modifications will be presented to the Board of Governors in Spring 2014.

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-07 - Significant Deficiency (Repeat of 2012-5)

Federal Award No. 84.007, 84.033, 84.038, 84.063, 84.268, 84.379 Student Financial Aid Cluster

Criteria: According to the Federal Student Aid Handbook, Volume 2, Chapter 6, a University must confirm that the student has completed face-to-face or online counseling, or that the student has been mailed exit loan counseling material within 30 days of learning that the student has withdrawn or failed to participate in an exit counseling session.

Condition: In our sample of 40 students, there was no documentation of exit counseling for 2 students. This issue was also noted in the Department of Education's Program Review for 6 students conducted from April 23, 2012 to April 27, 2012.

Effect: Students are not properly informed of their responsibilities for the repayment of loans received once leaving the University.

Questioned Costs: There were no questioned costs to report as the finding relates only to exit counseling and is not related to eligibility. During the prior year the Department of Education completed a review of the University's 2010-2011 and 2011-2012 award years and found similar errors with the exit counseling process as noted above. Penalties, if any, for these errors are unknown at the time of this report.

Cause: During the 2012-2013 year, in response to the prior A-133 finding and the Department of Education review, the University was in the process of updating processes and related controls to complete the exit counseling requirements for all students who have graduated or unofficially withdrawn within 30 days of the date of graduation or the date that the University determines that the student has withdrawn.

Recommendation: RubinBrown recommends that the Financial Aid department review and consider revisions to their processes and related controls in place to complete the exit counseling requirements for all students who have graduated or unofficially withdrawn within 30 days of the date of graduation or the date that the University determines that the student has withdrawn.

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Corrective Action Plan: The Office of Financial Assistance is notified of students that have withdrawn or graduated by reports or by the Office of Student Engagement. Once notified, the loan processing staff will send a notice of exit loan counseling to a student's personal email or last known personal address that is on file in Banner. This will be completed within 30 days of their official or unofficial last date of attendance or graduation date.

Although the University did not provide loan exit counseling for 20% of the students the Department reviewed, the University has low default rates on its Federal Direct Loans and all of the students listed in this finding are in repayment, deferment or forbearance. Since the University has continued to have Direct Loan default rates lower than 6% and all of the students are in good standing on their Federal loans, the Department will not require the University to provide a comprehensive review of loan exit counseling for all Title IV, HEA loan recipients who graduated or withdrew during 2010-11 and 2011-12 award years. The University of Central Missouri created a Policy and Procedure for sending Exit Loan Counseling information via interactive electronic means to all students who graduate or withdraw from the University. The University of Central Missouri has sent Exit Loan Counseling information to the 6 Students noted in the Department of Education review.

The two students missed in the 2012-13 aid year were late graduation candidates and were missed due to reporting being suspended after our graduation date. We have now implemented procedures to sweep the system until we receive word from the Registrar that all graduation applications are processed for the graduation term.

Responsible Official: Angela Karlin, Director of Student Financial Assistance

Date Of Completion: June 1, 2013

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Cause: The previous Director of Student Financial Assistance was unaware of the aforementioned requirements needed on the ECAR/PPA.

Recommendation: RubinBrown recommends that the University update the ECAR/PPA for noted errors and review for any additional changes that need to be made.

Corrective Action Plan: The Director of Financial Assistance added the Summit Center to the ECAR/PPA on August 6, 2012 and was approved by the U.S. Department of Education on October 26, 2012. The Director updated the ECAR with the names of the servicers. The University also removed a servicer that is no longer under contract for collection and Perkins services. This ECAR change submission occurred in December along with the change to list THRIVE as a CPT program. On December 17, 2012, THRIVE was added to The University's ECAR and supporting documents were sent via email to the FSA PEPS email as noted on the ECAR submission page. Both of these Corrections were approved by the U.S Department of Education on August 22, 2013.

Responsible Official: Angela Karlin, Director of Student Financial Assistance

**Expected Date Of Completion: Completed** 

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Cause: The previous Director of Student Financial Assistance was unaware of the requirements to identify a COA for each type of student.

Recommendation: RubinBrown recommends that the University create an annual COA that lists out each category of student and the associated COA for that category.

Corrective Action Plan: The University did not make adjustments to COA for students that were enrolled less than full time to reflect the actual academic workload which could cause overawarding. During the program review, former Director, Phil Shreves stated that all students are given a full-time COA and that the only COA differences were rates for undergraduate and graduate tuition. Reviewers indicated that students attending the University were not required to be enrolled full-time and a significant percentage of the University students were less than full time students.

In response to the PPR, the University has provided a revised COA for each student that was not full time for any term in 2009-10, 2010-11 and 2011-12. A review was conducted of all students enrolled in less than 12 credit hours for each term within the aid years listed above.

The University also updated the budgets for each group and the breakdown of each budget based on three-quarter enrollment (9-11 hours), half-time enrollment (6-8 hours) and less than half-time students for students in less than 3 hours. The methodology used to determine the new COA amounts was to take the tuition and fees allotment and multiplying the amounts by 75% for three-quarter time students and 50% for half-time students. These numbers were then assigned to each student based on their enrollment status. Individual budgets may be different due to professional judgment increases on a student-by-student basis.

The University has since revised the policy and procedures for determining COA.

Responsible Official: Angela Karlin, Director of Student Financial Assistance

**Expected Date Of Completion:** 

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-10 - Significant Deficiency

Federal Award No. 84.007, 84.033, 84.038, 84.063, 84.268, 84.379 Student Financial Aid Cluster

Criteria: According the Student Financial Aid Handbook Volume 5, Chapter 1 "A school should provide sufficient information for a student or prospective student to be able to determine the procedures for withdrawing and the financial consequences for doing so. In addition, a student should be able to estimate how much Federal Student Aid he or she will retain, and how much he or she may have to return upon withdrawing."

Condition: It was noted during the Department of Education's Program Review and during RubinBrown's review of the 2012-2013 aid year that the Return of Title IV policy lacked a statement providing students with information regarding the financial consequences of withdrawing, and providing an estimate of the amount of aid a student may earn or may have to return. It was also noted that the policy published was incorrect, see the Department of Education's Program Review Report Finding number 6.

Effect: Students may not be aware of their responsibilities to return aid if it is not earned in accordance with Federal Regulations. The University could also be incorrectly determining when a Return of Title IV calculation is necessary.

Questioned Costs: RubinBrown found no incorrect Return of Title IV calculations during the 2012-2103 aid year in our testing, however due to policy errors, calculation errors could occur.

Cause: The previous Director of Student Financial Assistance was unaware of the Return of Title IV policy requirements.

Recommendation: RubinBrown recommends that the University updates the Policy to follow regulations.

Corrective Action Plan: At the Department's request, the University has reviewed and revised the University's Return of Title IV Funds policy and procedure to ensure that the University is in compliance with the regulations cited above.

Responsible Official: Angela Karlin, Director of Student Financial Assistance

Expected Date Of Completion: Completed policy was implemented July 1, 2013

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-11 - Significant Deficiency

Federal Award No. 84.007, 84.033, 84.038, 84.063, 84.268, 84.379 Student Financial Aid Cluster

Criteria: According to the Student Financial Aid Handbook, Volume 1, Chapter 1, "to be eligible for FSA funds, a student must make satisfactory academic progress (SAP), and a school must have a reasonable policy for monitoring that progress...The SAP policy must be at least as strict as that for students who are not receiving FSA funds at the school, and it must apply consistently to all educational programs and to all students within categories. The policy must require an academic progress evaluation at the end of each payment period for students in programs lasting one year or less. For all other programs, the policy must require annual reviews and must correspond with the end of the payment period. For programs greater than one year, the policy may also call for progress reviews after each payment period. If you review at each payment period you must review SAP after the summer term if the student attends the summer term."

Condition: During the Department of Education Program Review and RubinBrown's 2012-2103 audit, it was noted that the SAP policy did not require the University to complete reviews after each payment period, instead only requiring review after the Spring Semester. The policy also allows students to appeal SAP and potentially receive aid for the following two semesters instead of reevaluating the SAP after the next payment period ends.

Effect: Students could be receiving aid improperly as they are not meeting Satisfactory Academic Progress.

Questioned Costs: Unknown. During the Department of Education Program Review additional information was requested for students who did not meet SAP in order to determine the amount of questioned cost and potential penalties. These amounts have not been determined by the Department of Education at the time of this report.

Cause: The previous Director of Student Financial Assistance was unaware of the SAP policy requirements.

Recommendation: RubinBrown recommends that the University update the SAP policy and procedures.

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Corrective Action Plan: The University has updated the SAP policy and has used it for evaluating students at the end of the Spring 2013 semester. All students, regardless of credit hours completed, are being measured based on the qualitative component of the policy which is 2.0 cumulative GPA for undergraduate students and 3.0 for graduate students. As for the noncompliance in regards to granted SAP appeals, the University is awarding only Fall semester aid for students that are granted an appeal and have reporting mechanisms in place to reevaluate all students in an appeal status for continued eligibility at the end of the Fall semester 2013.

Responsible Official: Angela Karlin, Director of Student Financial Assistance

Expected Date Of Completion: Policy revised and is effective as of August 1, 2013

SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Responsible Official: Angela Karlin, Director Student Financial Assistance

Date Of Completion: September 28, 2012

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-13 - Significant Deficiency (Partial Repeat of 2012-7)

Federal Award No. 84.007, 84.033, 84.038, 84.063, 84.268, 84.379 Student Financial Aid Cluster

Criteria: According to the Student Financial Aid Handbook Volume 4, Chapter 1 "A school may not require a student to take any action to obtain his or her credit balance. It is the sole responsibility of the school to pay, or make available, any FSA credit balance within the 14-day regulatory time frames. A school must obtain authorization from a student or parent before a school can hold an FSA credit balance. A school may not require or coerce the student or parent to provide an authorization and it must clearly explain to the student or parent how to cancel or modify the authorization."

Condition: While no instances of noncompliance were noted during our testing for 2012-2013, the Department of Education noted during their program review that the University requires students who have a credit balance to go online and authorize the University to release the credit balance. The University does not release a credit balance to a student until the student has completed this online authorization or until the end of the semester, whichever happens first.

Effect: Students may not be receiving a refund of their credit balances within the prescribed 14 days.

Questioned Costs: Unknown. Instances of noncompliance were noted in the Program Review conducted by the Department of Education and in our 2011-2012 audit of students not receiving the refund of credit balances within the prescribed 14 day requirement. Penalties, if any, have not been assessed by the Department of Education as of the date of this report.

Cause: The University does not appear to have proper processes and related controls in place to ensure that funds are remitted in accordance with federal regulations.

Recommendation: RubinBrown recommends that the University update the policy for refunds of credit balances to comply with the Student Financial Aid Handbook and Regulations.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Corrective Action Plan: After review, it is the intent and practice of the University to disburse federal aid funds to students and parents (in the case of parent loans) within the 14-day regulatory time frame after the credit balance occurs. The University does not intend to hold credit balances with a voluntary authorization and has in place a process to ensure compliance.

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### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-14 - Significant Deficiency (Repeat 2012-8)

Federal Award No. 84.007, 84.033, 84.038, 84.063, 84.268, 84.379 Student Financial Aid Cluster

Criteria: According to the Federal Student Aid Handbook, Volume 4, Chapter 2, "For each account that contains Federal Student Aid (FSA) program funds, a school must identify that FSA funds are maintained in the account by: including the phrase Federal funds in the name of the account, or notifying the bank or investment company of the account that contains FSA funds and keeping a copy of this notice in its records and, except for public institutions, filing a Uniform Commercial Code Form (UCC-1) statement with the appropriate state or municipal government entity that discloses that an account contains Federal funds. The school must keep a copy of the UCC-1 statement in its records."

Condition: The University's Perkins funds are held in the same bank account with the University's operating funds, and therefore separate reconciliations are performed monthly to verify amounts are being properly maintained. Per review of the Federal Student Aid Handbook, Volume 4, Chapter 2, this practice is acceptable as long as FSA balances are readily identifiable and earnings are properly calculated per FSA balance. However, during the program review completed by the Department of Education, it was noted that the account in which Perkins Loans were being held was not properly identified as Federal (as stipulated in the Federal Student Aid Handbook) and/or a UCC-1 statement was not on file for these funds.

Effect: An opportunity exists for misappropriation of Perkins Fund assets due to the lack of proper identification of funds.

Questioned Costs: Unknown. This issue was noted during the Department of Education program review and penalties, if any, for this issue are unknown at the time of this report.

Cause: The cause of the condition upon which the audit finding is based is that the University's bank account was not labeled as Federal when it was initially opened and the University did not notify the bank that the account contained FSA funds.

Recommendation: RubinBrown recommends that the University notify the bank that the account contains Federal funds and that the University keep a copy of the notice in its records. RubinBrown also recommends that the University change the name of the bank account so that the account is labeled as Federal.

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Corrective Action Plan: Management does not concur with the finding above. In the FSA Handbook - Volume 4 Processing Aid & Managing FSA Funds 2011-2012 - the handbook states "The requirement that a school file a UCC-1 statement when an account's name does not include the phrase federal funds was established to reduce the possibility that a school could misrepresent federal funds as its own funds to obtain a loan, or secure credit. Because public institutions generally do not seek to obtain credit in the same manner as private institutions, they are exempt from the requirement." The University does not feel it is in noncompliance. In addition, the University's banking institution has on record and it is documented in the banking services contract that the University depository account contains both federal and state funds. The federal funds that are in question, the Perkins Loan funds, are in a separate fund in the University's financial system and the cash disposition is readily available at any time.

Responsible Official: Toni Kreke, Sr. Director Accounting Services & Student Accounts

Expected Date Of Completion: N/A

### SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued) For The Year Ended June 30, 2013

Finding: 2013-15 - Significant Deficiency

Federal Award No. 84.007, 84.033, 84.038, 84.063, 84.268, 84.379 Student Financial Aid Cluster

Criteria: According to the Student Financial Aid Handbook, Application and Verification Guide, Chapter 5, "An aid administrator may use professional judgement on a case-by-case basis only to adjust the student's Cost of Attendance (COA) or the data used to calculate the student's Expected Family Contribution (EFC). The reason for the adjustment must be documented in the student's file, and it must relate to the special circumstances that differentiate the student - not to conditions that exist for a whole class of students."

Condition: The University does not have an institutional methodology for administering and processing professional judgment requests.

Effect: COA and EFC could be changed without the proper support and documentation being maintained in the student's file to support the use of professional judgment.

Questioned Costs: Unknown. This issue was noted during the Department of Education program review and penalties, if any, for these errors are unknown at the time of this report.

Cause: The previous Director of Student Financial Assistance was unaware of the Professional Judgment policy requirements.

Recommendation: RubinBrown recommends that the University create a policy to address the documentation, retention, and determination of COA and EFC changes in the cases of professional judgment.

Corrective Action Plan: The University has created written policies and procedures for processing students' requests for professional judgment. These policies include procedures of processing a request for separation of income also with verification and the University's policies for the application of an institutional methodology administered by the institution's financial aid staff to all professional judgment standard categories.

Responsible Official: Angela Karlin, Director of Student Financial Assistance

Expected Date Of Completion: Policy completed and implemented March 1, 2013

#### SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS For The Year Ended June 30, 2012

Finding	CFDA			Current Year
No	No.	Program	Condition	Status

2012-1 NA Financial Statement Finding Within the cash disbursement and purchase cycle, the Accounts Payable Manager has the ability to issue a check, access signed checks, record

# SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS (Continued ) For The Year Ended June 30, 2012

Finding No.	CFDA No.	Program	Condition	Current Year Status
2012-6	84.007, 84.033, 84.038, 84.063, 84.268, 84.375, 84.379	Student Financial Aid Cluster	Out of our sample of 40 students, for 30 students it was noted that the University was not sending letters/emails/notifications to students of their anticipated date and amount of disbursement, rights to cancel, and procedures to cancel within 30 days prior to or 30 days after the actual disbursement/credit	RESOLVED
2012-7	84.007, 84.033, 84.038, 84.063, 84.268, 84.375, 84.379	Student Financial Aid Cluster	Out of the 40 students tested during Student File testing, for 1 student who had a credit balance, the University did not remit the funds to the student within 14 days of the credit occurring and there was no evidence provided to support that the student (or parent) authorized the University to hold the credit balance. This issue was also noted for 3 students during the Department of Education review.	PARTIALLY REPEATED 2013-13
2012-8	84.007, 84.033, 84.038, 84.063, 84.268, 84.375, 84.379	Student Financial Aid Cluster	The University's Perkins funds are held in the same bank account with the University's operating funds and therefore separate reconciliations are performed monthly to verify amounts are being properly maintained. Per review of the 2011-2012 Federal Student Aid Handbook, Volume 4, Chapter 2, this practice is acceptable as long as FSA balances are readily identifiable and earnings are properly calculated per FSA balance. However, during the review completed by the DOE in the current year, it was noted that the account in which Perkins Loans were being held was not properly identified as Federal (as stipulated in the 2011-2012 Federal Student Aid Handbook) and/or a UCC-1 statement was not on file for these funds.	REPEATED 2013-14
2012-9	84.007, 84.033, 84.038, 84.063, 84.268, 84.375, 84.379	Student Financial Aid Cluster	Out of the 40 students tested during student file review testing, 2 of the students received Perkins loans, but did not appear to be exceptionally needy and no documentation was available as to why the students received aid.	REPEATED 2013-12
2012-10	10.861	Public Television Station Digital Transition Grant	During the University's fiscal year 2011-2012, the June 2012 report was not submitted until October 31, 2012. The report due date was August 10, 2012 (30	