Internal Audit Report

March 3, 2022



Campus Store Management Agreement and Sales Commissions

| RISK MITIGATION | | | | |
|-------------------------------------|---|--|---|--|
| Adequate Controls & Practices | Opportunity for Minor Improvement | Opportunity for Moderate Improvement | Opportunity for Significant Improvement | |
| | | | | |
| | | | | |
| | | | | |
| | Controls & | Controls & Minor | Controls & Minor Moderate | |



Campus Store Management Agreement and Sales Commissions Control Issues and Responses

- **Issue 1:** Course materials sales information provided by Barnes & Noble for February through May 2021 included a category called "miscellaneous adjustments" with no additional details. In addition, none of the gross sales reports for 2020-2021 provided a breakout of website sales as required by the management agreement.
- **Response:** Barnes & Noble has granted USI's Controller and Assistant Treasurer access to its reporting system (Birst). USI intends to obtain Birst access for one of the staff accountants as well, and the two of them expect to complete training on how to use the system by March 15, 2022.



Federal Student Aid Compliance

| | RISK MITIGATION | | | |
|--|-------------------------------------|---|--|---|
| Audit Objectives | Adequate Controls & Practices | Opportunity for Minor Improvement | Opportunity for Moderate Improvement | Opportunity for Significant Improvement |
| Compliance with Institutional Eligibility Requirements | | | | |
| Compliance with Federal Student Financial Assistance General Eligibility Requirements | | | | |
| Compliance with Federal PELL Grant Requirements | | | | |
| Compliance with Federal Campus-Based Program Requirements | | | | |
| Compliance with Federal Direct Loan and PLUS Loan Requirements | | | | |
| Compliance with other federal requirements contained in the Compliance Supplement | | | | |
| Fiscal Operations Report and Application to Participate (FISAP) Completed Accurately and Submitted Timely | | | | |
| Policies, Procedures and Other Issues | | | | |



Student Account Adjustments Risk Assessment

• **Issue:** Requests for adjustments to student accounts come from a variety of sources. It can be challenging to ensure that all adjustments are properly authorized and recorded.

Risk Assessment Objectives:

- Identify each type of adjustment that may be requested or initiated
- Identify the source for each type of adjustment
- Determine how each request is communicated and processed
- Identify controls in place or required to prevent or detect potentially unauthorized adjustments



Student Account Adjustments Risk Assessment

Results:

- Recommendation: Internal Audit recommends that the Bursar's Office consider the development of a Qualtrics form for adjustment requests
 - Streamline and standardize adjustment requests
 - Ensure appropriate information and proper authorization are obtained
- **Response:** The Controller and Bursar will develop a matrix of who may authorize different types of adjustments by March 31, 2022. The Bursar will develop a Qualtrics form for adjustment requests with a target for implementation by July 31, 2022.



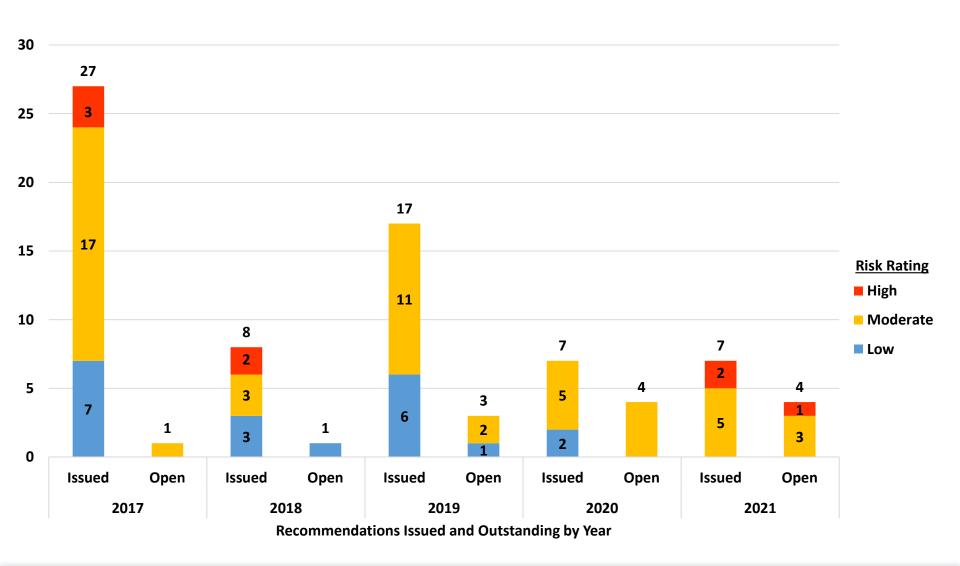
Audit Recommendation Matrices

Rating definitions

- Low Minor issue; characterized by insignificant financial impact or minimal impact on ability to meet goals and objectives
- Moderate Medium-priority internal control or risk management issue; characterized by modest financial losses, reputation damage, or delayed achievement of goals and objectives
- High Significant internal control or risk management issue; characterized by high susceptibility to fraud or misappropriation, material financial impact, considerable damage to reputation, or inability to achieve goals and objectives



Audit Recommendation Status Update





2022 Internal Audit and Advisory Services Plan

| QUARTER BEGINNING | AUDIT AREA | DESCRIPTION | HOURS |
|----------------------|---|---|-------|
| January 2022 | Payment Card Industry (PCI) Compliance | Evaluate compliance with data security standard using self-assessment questionnaires | 240 |
| | Higher Education Emergency Relief Funds | Monitor regulatory guidance and advise management of compliance issues related to use of funds | 100 |
| | Internal Control Documents for financial statement audit | Documentation of accounting and financial reporting controls for state auditors | 125 |
| | Enrollment Reporting | Review federal enrollment reporting requirements and processes and procedures to ensure compliance | 220 |
| | University Risk Management Committee | Facilitation of University Risk Management Committee activities | 150 |
| | Investments | Review investment management agreements and compliance with policy | 200 |
| | Facility Operations Storeroom | Physical inventory observation | 50 |
| | Institutional Scholarship and Fee Waivers Risk Assessment | Review risks and controls associated with institutional scholarships and fee waivers | 220 |
| | Athletics Eligibility | Review of student athlete eligibility | 200 |
| | Federal Student Financial Aid | Review administration of federal student aid for compliance with federal requirements governing Title IV student aid programs | 250 |
| | IT Security Initiatives | Monitor progress on security findings from prior IT security and privacy audits & coordinating follow-up to past external audit reviews | 200 |
| October 2022 | External Audit Support | Support for external auditors performing federal financial aid audit and state aid agreed upon procedures | 120 |
| | Housing & Residence Life | Review new residential management software user access and controls over billing and residence contracts | 200 |
| | Enrollment Deposits | Review controls over the assessment, collection, and accounting of enrollment deposits | 220 |

| Total Hours | 2,495 | |
|--|-------|--|
| Hours Available | 2,527 | |
| Hours available for unscheduled audits | 32 | |

