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Florida Board of Governors State University System
University of South Florida
Internal Management and Accounting Control and Business
Process Assessment

November 2019

Florida Board of Governors State University System
University of South Florida (USF) Internal Management and Accounting Control and Business Process Assessment
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I. Executive Summary

The Board of Governors (the “Board” or “BOG”) of the Florida State University System (SUS) engaged Crowe LLP to perform a system-wide “Internal Management and Accounting Control and Business Process Assessment”. The purpose of this assessment was to evaluate the existing internal controls and review business processes to identify any areas of risk for the SUS.

The scope of our assessment was focused on financial and operational risks, and regulatory compliance risks among the twelve universities within the SUS.

We have presented the results of our assessment of the University of South Florida (USF) in this report. We used our risk rating methodology to evaluate and score sixty-two (62) risks statements grouped into twelve categories. Our conclusions were based on the level of residual risk and any control gaps or weaknesses noted during our assessment. Residual risk refers to the level of risk after considering the internal controls in place and other activities implemented to mitigate that risk. An in-depth discussion of our approach and rating methodology can be found in the *Assessment Overview* section of this report.

Conclusion

While the scope of our assessment precludes us from issuing an opinion on USF’s system of internal controls, based on our procedures we noted no risk categories with a high level of residual risk, or significant control gaps or weaknesses in USF’s control structure.

We concluded that five of the twelve risk categories we evaluated had a minor residual risk rating, and seven categories had a low residual risk rating. We also did not identify any reportable gaps in internal control where USF could improve controls or risk mitigation activities.

USF Observations Summary

Crowe noted no observations.

II. Assessment Overview

The Board of Governors (the “Board” or “BOG”) of the Florida State University System (SUS) engaged Crowe LLP to perform a system-wide “Internal Management and Accounting Control and Business Process Assessment”. The purpose of this assessment was to evaluate the existing internal controls and review business processes to identify any areas of risk for the SUS. We performed these consulting services in accordance with the Standards for Consulting Services established by the American Institute of Certified Public Accountants. These services do not constitute an audit, review, or examination in accordance with standards established by the American Institute of Certified Public Accountants, and therefore, Crowe did not express an opinion on the accuracy or efficacy of the material assessed during the performance of these services.

The scope of our assessment was focused primarily on financial and operational risks, and secondarily on regulatory compliance risks. It included the twelve universities within the SUS as follows:

- Florida Agricultural and Mechanical University (FAMU)
- Florida Atlantic University (FAU)
- Florida Gulf Coast University (FGCU)
- Florida International University (FIU)
- Florida Polytechnic University (FPU)
- Florida State University (FSU)
- New College of Florida (NCF)
- University of Central Florida (UCF)
- University of Florida (UF)
- University of North Florida (UNF)
- **University of South Florida (USF)**
- University of West Florida (UWF)

This report represents the results of our assessment of the University of South Florida (USF). As part of our assessment, we obtained an understanding of BOG regulations, university policies, procedures, processes and business requirements. In addition, we sent surveys and conducted interviews with various members of USF management. Based on this information, we developed a risk and control assessment, the results of which are summarized below.

Inherent Risk Assessment

We developed an inherent risk assessment for each university in the SUS. The inherent risk assessments consisted of a list of risk factors which, based on our research and experience, are relevant, impactful, and likely to occur in a university environment. We rated some inherent risks differently across universities due to environmental or organizational variables (e.g. research-based universities, student enrollment, campus location(s), age of infrastructure, student housing, etc.). At this point in the assessment we did not yet consider the specific risk management and controls that each university had in place to mitigate these risks. It was designed to provide a baseline upon which to measure control effectiveness at the university level.

Risk Rating Scale

Impact	Score
Low	1
Minor	2
Moderate	3
High	4
Severe	5

Likelihood	Score
Remote	1
Improbable	2
Possible	3
Probable	4
Almost Certain	5

Risk Rating	Score
Low	1
Minor	2
Moderate	3
High	4
Severe	5

We established the threshold for reportable risk levels at a residual risk score of 4 or higher.

We established a risk rating methodology to assign a score to each risk factor in the assessment as illustrated above. Our risk rating methodology considered two criteria, "Impact" and "Likelihood". The "Risk Rating" represents the average of those two scores. The impact criterion addressed the effect on financial, operational, or compliance objectives if the risk factor were to occur. The likelihood criterion addressed the probability that the risk would occur in the current environment. Our scores were based on a five-point rating scale with one (1) representing the lowest, and five (5) representing the highest risk score. We labeled the risk rating in the same manner as the impact criterion for the purpose of simplicity and consistency.

Control Ratings

We also rated the internal controls in place according to the three criteria below. The percentage assigned to each rating represents the reduction in perceived levels of risk and was used to calculate the residual risk score.

- No Observations Noted (30% reduction to the inherent risk rating),
- Needs Improvement (15% reduction to the inherent risk rating), or
- Inadequate (0%, no reduction to the inherent risk rating)

We based the control ratings on the results of our research, discussions with management, and the supporting documentation they provided to help us analyze USF's control structure.

Residual Risk Assessment

We assigned a control rating to each control to arrive at a residual risk rating in a consistent manner. The residual risk assessment was intended to provide an overview of the university's risk management and system of internal control. We recognized that each control and its related risk had unique components that would not be fully represented by the control or residual risk rating. Therefore, we developed an observation and recommendation for controls rated as "Needs Improvement" or "Inadequate" to provide additional insight into that specific matter.

We used the risk category ratings, as illustrated in **Exhibit 1** below, to summarize the sixty-two (62) risk statements which we evaluated and scored during this assessment. We assessed the risk factors from the perspective of “inherent risk” (i.e. prior to considering implementation of controls) and “residual risk” (i.e. after consideration of controls in place to mitigate the risk). In total we grouped risks into twelve categories and deemed five categories to have a minor level of residual risk and seven categories to have a low level of residual risk. USF’s three highest categories of residual risk were Cash Management, Procurement, and Grant Management. However, based on our methodology, all risk categories were below our threshold for a reportable observation.

The bar graph illustrates the difference between the average inherent and residual risk scores for each risk category. Please note that if an individual risk factor exceeded the threshold, we would have reported an observation and recommendation for those factors. However, we did not note any individual risk factors that exceeded the threshold, and these key functions/risk categories also have average residual risk scores below our threshold. This is an indicator that our observations identified were not systemic to the functional area.

Exhibit 1: USF Inherent vs. Residual Risk by Category

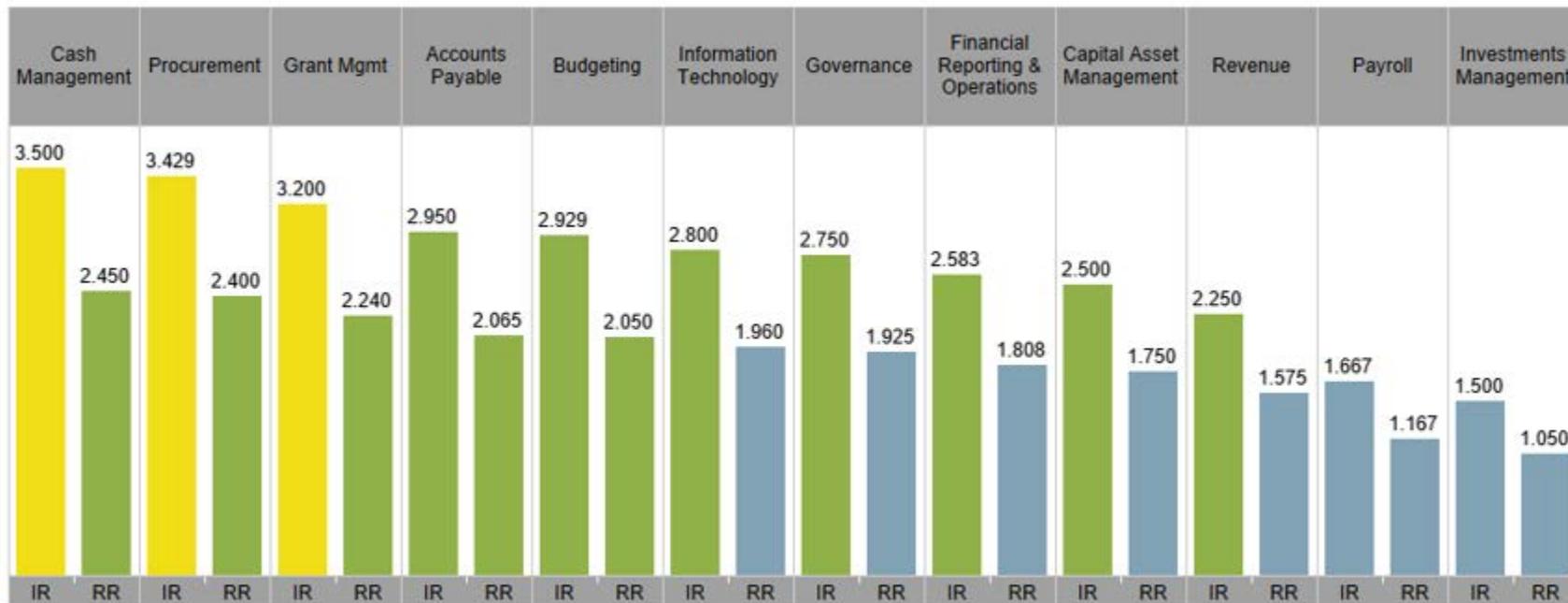


Exhibit 2 highlights similar information but uses different visualizations to illustrate how the control rating reduced the level of inherent risk (i.e. resulting in the residual risk score). The inherent risk represents the baseline score in each category prior to considering internal controls. The control mitigation score represents our assessment of the controls in each category. The residual risk score is the net result of the two scores and is used to indicate whether the control structure was adequately designed to mitigate the associated risks to a reasonable level. Again, this exhibit indicates that all risk categories had average residual risks below our threshold for reportable observations.

Exhibit 2: USF Inherent vs. Residual Risk with Control Rating

Risk Factor Category	IR	Control Mitigation Effectiveness	RR
Accounts Payable	2.950	0.300	2.065
Budgeting	2.929	0.300	2.050
Capital Asset Management	2.500	0.300	1.750
Cash Management	3.500	0.300	2.450
Financial Reporting & Operations	2.583	0.300	1.808
Governance	2.750	0.300	1.925
Grant Mgmt	3.200	0.300	2.240
Information Technology	2.800	0.300	1.960
Investments Management	1.500	0.300	1.050
Payroll	1.667	0.300	1.167
Procurement	3.429	0.300	2.400
Revenue	2.250	0.300	1.575

Conclusion

Based on our procedures, we noted no individual risk factors which arose to the level of a reportable observation (i.e. a residual risk score of 4 or greater). In addition, our risk and control assessment did not identify any specific gaps in control or areas to significantly improve risk management and control practices. Therefore, no observations were noted.

III. Objectives and Scope

The purpose of this assessment was to evaluate the existing internal controls and review business processes to identify any areas of risk for the SUS. We accomplished this by completing a risk and control assessment for each university within the SUS, which enabled us to identify gaps or weaknesses in internal controls and make recommendations to the university and the BOG for improvement. In summary, our objectives were to evaluate the risks, controls, and business processes related to financial accounting and operations at USF, and to provide observations and recommendations to the USF Board of Trustees, USF leadership, and the BOG on improving the risk management, controls, and business processes within the university.

The scope of our assessment included the following activities and processes at USF:

1. Internal Management and Accounting Controls over:
 - a. Accounting Operations (e.g. Accounts Payable, Accounts Receivable, Payroll)
 - b. Financial Statement Preparation and Issuance
 - c. Grant Management
2. Business Processes and Operations, including:
 - a. Procurement
 - b. Budget Management and Oversight (Capital and Operating)
 - c. Capital Program and Asset Management
 - d. Information Systems Management
 - e. Cyber Security
 - f. Contract Management
3. Compliance matters, including:
 - a. Data Privacy rules and regulations
 - b. Federal and State Grant reporting requirements
 - c. Financial Aid regulations

IV. Procedures Performed

It should be recognized that internal controls are designed to provide reasonable, but not absolute, assurance that errors and irregularities will not occur, and that procedures are performed in accordance with management's intentions. There are inherent limitations that should be recognized in considering the potential effectiveness of any system of internal controls. In the performance of most control procedures, errors can result from misunderstanding of instructions, mistakes in judgment, carelessness, or other factors. Internal control procedures can be circumvented intentionally by management with respect to the execution and recording of transactions, or with respect to the estimates and judgments required in the processing of data. Controls may become ineffective due to newly identified business or technology exposures. Further, the projection of any evaluation of internal control to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, and that the degree of compliance with procedures may deteriorate. A summary of the procedures we completed during our assessment of USF have been summarized in the table below.

Summary of Procedures
1. We reviewed BOG regulations, university policies, procedures, processes and business requirements.
2. We prepared an inherent risk assessment, which includes risks arising from our assessment of the above, as well as our experience in common risks within higher education, specific to financial and operational issues.
3. We analyzed risk/control questionnaires completed by university management and identified key controls in place to manage the risks identified above.
4. We conducted interviews onsite with university management for insight into risk management and control perspectives and activities.
5. We evaluated USF's risk management and control structure based on the information gathered above.
6. Where applicable, we identified gaps in controls and process improvement opportunities.
7. We have confirmed with USF management the factual basis for our conclusions.

V. Observations and Recommendations

Our procedures did not yield any observations in areas where we determined that controls were absent or were not adequate to mitigate the associated risk to an acceptable level.

VI. Appendix - List of Interviewees at USF

The following individuals were interviewed during our onsite visit to USF the week of August 12, 2019. The name, title, and interview subject are included below.

1. Accounts Payable & Procurement:
 - a. Jennifer Condon, University Controller
 - b. Robert Hunt, Associate Controller for Payment Services
 - c. George Cotter, Director for Procurement Services
 - d. Russ Nally, Associate controller for Accounting & Reporting Services
2. Budgeting and Financial Management: Jennifer Condon, University Controller
3. Capital Asset Management:
 - a. Jennifer Condon, University Controller
 - b. Calvin Williams, VP Facilities Management
4. Cash Management:
 - a. Jennifer Condon, University Controller
 - b. Russ Nally, Associate controller for Accounting & Reporting Services
5. Grant Management: Keith Anderson, Director of Sponsored Research
6. Student Billing: Jennifer Condon, University Controller
7. Payroll: Donna Keener, Assistant Vice President Human Resources
8. Information Technology: Sidney Fernandes, Chief Information Officer
9. Compliance & Ethics: Jeff Muir, Compliance Officer