SUNY Buffalo State Internal Control Program Overview

January 29, 2015

Internal Control

Let's start with a definition:

Internal control is a process, effected by an entity's board of directors, management, and other personnel, designed to provide reasonable assurance regarding the achievement of objectives relating to operations, reporting, and compliance.



NYS Internal Control Act of 1987

 Governmental Accountability, Audit and Internal Control Act (the Internal Control Act or the Act)

 Identifies internal control responsibilities of state agencies



NYS Internal Control Act of 1987 These responsibilities cover:

- Internal control
- Internal audit
- Independent audits of the executive chamber, division of the budget, the department of audit and control, and the division of law



- § 951. Internal control responsibilities.
 - 1. The head of each state agency shall:
 - a. establish and maintain for the agency guidelines for a system of internal control that are in accordance with this article and internal control standards;



- § 951. Internal control responsibilities.
 - 1. The head of each state agency shall:
 - a. establish and maintain for the agency guidelines for a system of internal control that are in accordance with this article and internal control standards;
 - b. establish and maintain for the agency a system of internal control and a program of internal control review...designed to identify internal control weaknesses, identify actions that are needed to correct these weaknesses, monitor the implementation of necessary corrective actions and periodically assess the adequacy of the ongoing internal control;



- § 951. Internal control responsibilities, cont'd.
 - 1. The head of each state agency shall:
 - c. make available to each officer and employee of the agency a clear and concise statement of the generally applicable management policies and standards with which the officer or employee of such agency shall be expected to comply. Such statement shall emphasize the importance of effective internal control to the agency and the responsibility of each officer and employee for effective internal control;



- § 951. Internal control responsibilities, cont'd.
 - 1. The head of each state agency shall:
 - d. designate an internal control officer, who shall report to the head of the agency, to implement and review the internal control responsibilities established pursuant to this section;



- § 951. Internal control responsibilities, cont'd.
 - 1. The head of each state agency shall:
 - d. designate an internal control officer, who shall report to the head of the agency, to implement and review the internal control responsibilities established pursuant to this section;
 - e. implement education and training efforts to ensure that officers and employees within such agency have achieved adequate awareness and understanding of internal control standards and, as appropriate, evaluation techniques; and



§ 951. Internal control responsibilities, cont'd.

- 1. The head of each state agency shall:
 - f. periodically evaluate the need for an internal audit function.

Full text of the Internal Control Act is available: http://www.osc.state.ny.us/agencies/ictf/docs/internal_control_act.pdf



Division of the Budget

 Budget Policy & Reporting Manual, B-350 <u>http://www.budget.ny.gov/guide/bprm/b/b350.html</u>

SUNY

- Internal Control Program, Policy No. 7500 <u>http://www.suny.edu/sunypp/documents.cfm?doc_id=290</u>
- Internal Control Program Guidelines, Procedure No. 7501

http://www.suny.edu/sunypp/documents.cfm?doc_id=289



There are five interrelated components to internal control:

- 1. <u>Control Environment</u>
- 2. <u>Communication</u>
- 3. <u>Risk Assessment</u>
- 4. Control Activities
- 5. Monitoring



There are five interrelated components to internal control:

1. <u>Control Environment</u>



There are five interrelated components to internal control:

1. <u>Control Environment</u>: The attitude toward internal control as demonstrated by management and employees.

Elements:

Ethical values, management's operating style and philosophy, competency, supportive attitude, mission, and structure



There are five interrelated components to internal control:

2. <u>Communication</u>



There are five interrelated components to internal control:

2. <u>Communication</u>: The exchange of relevant and timely information which assists individuals in making decisions and carrying out their responsibilities in appropriate ways.

Elements:

Timeliness, adequate (not excessive) detail, clear expectations and evaluation measures



There are five interrelated components to internal control:

3. <u>Risk Assessment</u>



There are five interrelated components to internal control:

3. <u>Risk Assessment</u>: Identifying, evaluating, and determining how to manage risks which threaten the accomplishment of objectives.

Assessing the risk:

What obstacles prevent attaining objective? What could go wrong / is the worst that could happen? Have there been changes to: goals, processes, legislation *What keeps you awake at night?*



There are five interrelated components to internal control:

4. Control Activities



There are five interrelated components to internal control:

4. <u>Control Activities</u>: The processes and tools that help prevent or reduce the risks that threaten to impede accomplishment of the organization's objectives and mission.

Examples: Documentation, approval and authorization, separation of duties, safeguarding assets, reporting



There are five interrelated components to internal control:

5. Monitoring



There are five interrelated components to internal control:

5. <u>Monitoring</u>: Review of the organization's activities and transactions to assess performance over time and determine whether controls are effective.

Major areas for monitoring: Control Activities, mission, control environment, communication, risks and opportunities, results



Buffalo State's Annual Communications

- President's "Tone at the Top"
- Internal Control Summary and Certification

Both documents are available: http://internalcontrol.buffalostate.edu/



Program Focus

- State Funded Programs to date
- The Research Foundation for SUNY
- The Buffalo State College Foundation



At Buffalo State

- Executive Leadership

 President's Cabinet
- Internal Control Steering Committee

 Senior Management & Administrators



At Buffalo State

- Internal Control Working Committee
 - Lisa Krieger, Rebecca Schenk, James Thor



At Buffalo State

- Campus-engaged Auditors
 - Tronconi, Segarra and Associates



At Buffalo State

- Campus-engaged Auditors
 - Tronconi, Segarra and Associates
 - Annual cost \$28,000 per year



Audits

- Selection Process
 - SUNY High Risk Areas
 - Office of the State Comptroller (OSC)
 - Risk Assessments
 - External reviews
 - Communications identifying possible weaknesses or non-compliance



Audits

- SUNY High Risk Areas
 - Financial Aid
 - Revenue and Cash Management
 - Property Control
 - Personnel and Payroll
 - Procurement
 - Disaster Planning and Recovery
 - Computer Operations
 - General Control Environment



Audits

- 2014-15 Campus-Engaged Audits
 - OSC Advisory 28 Controls over the Payment Process (Accounts Payable, Purchasing)
 - Computer Operations
 - General Control Environment



Audits

- External Audits
 - Financial Aid Single Audit
 - Others as notified



Discussion