

Reports Required by *Government Auditing Standards* and Uniform Guidance June 30, 2018

# The University of Oklahoma - Norman Campus



## Independent Auditor's 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*

To the Board of Regents The University of Oklahoma - Norman Campus Norman, Oklahoma

We have audited, in accordance with 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 Oklahoma - Norman Campus (the University), an organizational unit of the Regents of the University of Oklahoma (the Regents) as of and for the year ended June 30, 2018, 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 19, 2018.

#### **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 an 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 there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over financial reporting 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 financial reporting that might be material weaknesses or significant deficiencies. 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 a certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as finding 2018-A, that we consider to be a significant deficiency.

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the University's financial statements are free from 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*.

#### The University's Response to Findings

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 results of that testing, and not to provide an opinion on the effectiveness of the entity'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.

Oklahoma City, Oklahoma

Ede Sailly LLP

October 19, 2018



### Independent Auditor's Report on Compliance for Each Major Federal Program; Report on Internal Control Over Compliance Required by the Uniform Guidance

To the Board of Regents The University of Oklahoma - Norman Campus Norman, Oklahoma

#### Report on Compliance for Each Major Federal Program

We have audited The University of Oklahoma - Norman Campus's compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of The University of Oklahoma - Norman Campus's major federal programs for the year ended June 30, 2018. The University of Oklahoma - Norman Campus's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

#### **Management's Responsibility**

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

#### **Auditor's Responsibility**

Our responsibility is to express an opinion on the compliance for each of The University of Oklahoma - Norman Campus's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about The University of Oklahoma - Norman Campus's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of The University of Oklahoma - Norman Campus's compliance.

#### **Opinion on Each Major Federal Program**

In our opinion, The University of Oklahoma - Norman Campus (the University) complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major Federal programs for the year ended June 30, 2018.

#### **Report on Internal Control over Compliance**

Management of the University is responsible for establishing and maintaining effective internal control over compliance with the compliance requirements referred to above. In planning and performing our audit of compliance, we considered the University's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the University's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a compliance requirement will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

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 that might be material weaknesses or significant deficiencies and therefore, material weaknesses and significant deficiencies may exist that have not been identified. We identified certain deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2018-001, 2018-002, 2018-003, and 2018-004 that we consider to be material weaknesses.

The University's response 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 response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

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 the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Oklahoma City, Oklahoma October 19, 2018

Esde Sailly LLP

October 19, 2016

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOT CASH EXPEND	BASIS
RESEARCH AND DEVELOPMENT PROGRAMS					
Department of Agriculture - Direct					
Agricultural Research Service	10.001		-		\$ 120,288
National Institute of Food and Agriculture	10.310**		186,503		742,036
Department of Agriculture - Pass Through			186,503		862,324
Kansas State University	10.310**	S15197			295,987
Oklahoma State University	10.320	2560690OU1			32,272
Community Services Council of Greater Tulsa	10.331	FY17ORA213			16,110
OK Department of Health	10.557	3409021467			1,122
					345,491
Department of Agriculture - Total			186,503		1,207,815
Dopartinoni of Agriculturo Total			100,000		1,201,010
Department of Commerce - Direct	44.424		550 700		000.070
National Oceanic and Atmospheric Administration National Oceanic and Atmospheric Administration	11.431 11.432		558,703 2,790,886		966,273 19,555,221
National Oceanic and Atmospheric Administration	11.459		2,790,000		1,882,324
National Oceanic and Atmospheric Administration	11.468		29,371		936,065
			3,378,960		23,339,883
Developed (Communication)					
Department of Commerce - Pass Through University of Wisconsin	11.459	797K834			17,596
Colorado State University	11.619	G007453			556,065
colorado ciato cimololi,	11.010	3007.100			573,661
Department of Commerce - Total			3,378,960		23,913,544
Department of Defense - Direct					
Army	12.300			67,694	
Navy	12.300		9,330	73,193	
Office of Naval Research	12.300		21,571	901,872	
Subtotal	12.300				1,042,759
Defense Threat Reduction Agency Medical Research Acquisition Activity	12.351 12.420				843,176
Army Research Office	12.420				13,511 78,856
Air Force	12.800			422,201	70,000
Air Force Office of Scientific Research	12.800			297,907	
Subtotal	12.800				720,108
National Security Agency	12.901				30,783
Advanced Research Projects Agency	12.910				39,981
			30,901		2,769,174
Department of Defense - Pass Through					
Oklahoma State University	12.320	2568930OU1			4,456
Binghamton University	12.431	79697			76,291
,			-		80,747
Department of Defense - Total			30,901		2,849,921
Department of Interior - Direct					
Bureau of Indian Affairs	15.156				56,432
Fish and Wildlife	15.615				2,146
Geological Survey	15.807				18,927
Geological Survey	15.808				12,841
Geological Survey	15.810				78,509
Geological Survey Geological Survey	15.819 15.820		000 200		1 556 600
Geological Survey National Park Service	15.945		889,299		1,556,623 5,904
Haushai i ain oorrioo	10.040		889,299		1,731,382
			000,200		.,. 0 .,002

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTAI CASH BA EXPENDITI	SIS
Demonstrated Interior Describerable					
Department of Interior - Pass Through OK Wildlife and Conservation Commission	15.605	3209006577			1,817
OK Wildlife and Conservation Commission  OK Wildlife and Conservation Commission	15.611	F17AF01294			26,206
OK Wildlife and Conservation Commission	15.615	3209006971		21,034	20,200
OK Wildlife and Conservation Commission	15.615	F17AP00204		8,401	
OK Wildlife and Conservation Commission	15.615	F17AP00208		19,149	
Subtotal	15.615	1 17AI 00200		10,140	48,584
OK Wildlife and Conservation Commission	15.634	3209006301		2,806	40,004
OK Wildlife and Conservation Commission	15.634	3209006377		10,669	
OK Wildlife and Conservation Commission	15.634	3209006399		38,039	
OK Wildlife and Conservation Commission	15.634	3209006623		29,093	
OK Wildlife and Conservation Commission	15.634	3209006854		23,063	
OK Wildlife and Conservation Commission	15.634	3209006966		8,742	
OK Wildlife and Conservation Commission	15.634	F14AF01224		15,335	
OK Wildlife and Conservation Commission	15.634	F14AF01225		3,473	
OK Wildlife and Conservation Commission	15.634	F14AF01227		4,785	
OK Wildlife and Conservation Commission	15.634	F15AF01149		7,356	
OK Wildlife and Conservation Commission	15.634	F16AF01213		1,692	
OK Wildlife and Conservation Commission	15.634	F16AF01297		30,344	
Southwestern OK State University	15.634	FY17089		7,656	
University of Arkansas	15.634	SA1703165	_	2,195	
Subtotal	15.634				185,248
University of Wisconsin	15.669	632K133		1,508	
Wildlife Management Institute	15.669	GPLCC201601		103,592	
Subtotal	15.669				105,100
University of Wisconsin	15.678	772K063			12,502
University of Southern California	15.808	94315253			19,785
AmericaView	15.815	AV14OK01			8,237
Oklahoma Historical Society	15.904	16101		11,135	
Oklahoma Historical Society	15.904	16202		7,387	
Oklahoma Historical Society	15.904	17101		82,682	
Oklahoma Historical Society	15.904	17401		21,140	
Oklahoma Historical Society	15.904	17402	-	17,340	
Subtotal	15.904			_	139,684
				-	547,163
Department of Interior - Total			889,299	_	2,278,545
Department of Justice - Direct					
Department of Justice National Institute of Justice	16.560				67,240
			-	-	67,240
				=	
Department of Justice - Pass Through					
Tulsa Family Safety Center	16.582	FY170RA227			40,011
OK Department of Corrections	16.601	FY18ORA49		_	26,065
				_	66,076
Department of Justice - Total				-	133,316
Department of Transportation - Direct					
Federal Aviation Administration	20.109				364.568
Office of Assistant Secretary for Research and Technology	20.701		759,312		1,166,635
, -5)				_	.,,
			759,312	_	1,531,203

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTAL CASH BASIS EXPENDITURES	<u> </u>
Department of Transportation - Pass Through					
OK Department of Transportation	20.106	2161			82,098
OK Department of Transportation	20.200	1308		56,973	02,030
OK Department of Transportation	20.200	1915		141,299	
OK Department of Transportation	20.200	2228		11,567	
OK Department of Transportation	20.200	2262		44,909	
OK Department of Transportation	20.200	2273		38,962	
OK Department of Transportation	20.200	2276		108,626	
OK Department of Transportation	20.200	2280		47,175	
OK Department of Transportation	20.200	2282		32,700	
OK Department of Transportation	20.200	2300		59,690	
OK Department of Transportation	20.200	2301		41,406	
OK Department of Transportation	20.200	2303		33,901	
·	20.200	AGMT100114		(95)	
OK Department of Transportation	20.200	SPR1916		225,061	
OK Department of Transportation			442.254		
OK Department of Transportation	20.200	SPR2160B	143,354	539,046	
Purdue University	20.200 20.200	17078157		13,466	
Oklahoma State University		156323601		26,089	
Oklahoma State University	20.200	156619701		21,854	
Oklahoma State University	20.200	AA55947501		135	=
Subtotal	20.200	FF\/0047	404.700		1,442,764
OK Department of Transportation	20.205	FFY2017	164,789	540.000	607,619
OK Department of Transportation	20.509	FTA5311TP18350	247,500	518,336	
OK Department of Transportation	20.509	TRAMS2017	160,000	332,230	
Subtotal	20.509	505000040			850,566
Oklahoma Highway Safety Office	20.600	5859023240		50.000	979
Oklahoma Highway Safety Office	20.616	M3DA17060114		59,069	
Oklahoma Highway Safety Office	20.616	M3DA18060115		54,924	
Oklahoma Highway Safety Office	20.616	M3DA18060212		144,231	
Oklahoma Highway Safety Office	20.616	M3DA18060302 OHSOFFY2017OU001		23,298	
Oklahoma Highway Safety Office	20.616	05		71,762	
		OHSOFFY2017OU001			
Oklahoma Highway Safety Office	20.616	23		17,915	
Subtotal	20.616				371,199
Florida International University	20.701	80000734901UG		45,986	
Missouri University of Science and Technology	20.701	0004213405		15,059	
Subtotal	20.701				61,045
			715,643		3,416,270
Department of Transportation - Total			1,474,955		4,947,473
National Aeronautics and Space Administration - Direct					
Langley Research Center	43.001			36,994	
Shared Services Center	43.001		193,429	1,303,603	
Subtotal	43.001				1,340,597
Shared Services Center	43.008		505,647	_	871,609
		•	699,076		2,212,206

National Aeronautics and Space Administration - Pass Through           Jet Propulsion Laboratory         43.001         1594880         3,346           Kansas State University         43.001         S17105         7,140           Pennsylvania State University         43.001         5477UONASAB50G         37,075           Radiometrics Corporation         43.001         FY180RA113         37,487           Smithsonian Astrophysical Observatory         43.001         AR718007X         23,847           Smithsonian Astrophysical Observatory         43.001         G0617051X         24,105           Smithsonian Astrophysical Observatory         43.001         GO718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14082002A         996
Jet Propulsion Laboratory         43.001         1594880         3,346           Kansas State University         43.001         S17105         7,140           Pennsylvania State University         43.001         5477UONASAB50G         37,075           Radiometrics Corporation         43.001         FY180RA113         37,487           Smithsonian Astrophysical Observatory         43.001         AR718007X         23,847           Smithsonian Astrophysical Observatory         43.001         G0617051X         24,105           Smithsonian Astrophysical Observatory         43.001         G0718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO14058001A         7,517           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Kansas State University         43.001         S17105         7,140           Pennsylvania State University         43.001         5477UONASAB50G         37,075           Radiometrics Corporation         43.001         FY180RA113         37,487           Smithsonian Astrophysical Observatory         43.001         AR718007X         23,847           Smithsonian Astrophysical Observatory         43.001         G0617051X         24,105           Smithsonian Astrophysical Observatory         43.001         GO718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Pennsylvania State University         43.001         5477UONASAB50G         37,075           Radiometrics Corporation         43.001         FY180RA113         37,487           Smithsonian Astrophysical Observatory         43.001         AR718007X         23,847           Smithsonian Astrophysical Observatory         43.001         GO617051X         24,105           Smithsonian Astrophysical Observatory         43.001         GO718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Radiometrics Corporation         43.001         FY180RA113         37,487           Smithsonian Astrophysical Observatory         43.001         AR718007X         23,847           Smithsonian Astrophysical Observatory         43.001         G0617051X         24,105           Smithsonian Astrophysical Observatory         43.001         G0718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Smithsonian Astrophysical Observatory         43.001         AR718007X         23,847           Smithsonian Astrophysical Observatory         43.001         GO617051X         24,105           Smithsonian Astrophysical Observatory         43.001         GO718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Smithsonian Astrophysical Observatory         43.001         GO617051X         24,105           Smithsonian Astrophysical Observatory         43.001         GO718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Smithsonian Astrophysical Observatory         43.001         GO718102B         17,992           Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Space Telescope Science Institute         43.001         HSTAR13898001A         9,078           Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Space Telescope Science Institute         43.001         HSTAR15035001A         7,517           Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Space Telescope Science Institute         43.001         HSTGO13857003A         14,583           Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Space Telescope Science Institute         43.001         HSTGO14058001A         7,112           Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Space Telescope Science Institute         43.001         HSTGO14082002A         29,839           Space Telescope Science Institute         43.001         HSTGO14232002A         996
Space Telescope Science Institute 43.001 HSTGO14232002A 996
Space Telescope Science Institute 43.001 HSTG014693001A 11,028
Space Telescope Science Institute 43.001 HSTG014736001A 6,917
Space Telescope Science Institute 43.001 HSTGO16141005A 3,048
South Dakota State University 43.001 3TB509 99,902
University of Florida 43.001 UFDSP00011401 5,953
Subtotal 43.001 61.05.00011401 346.96
University of Tulsa 43.008 142120532494802 38,16
- 385,15
National Aeronautics and Space Administration - Total 699,076 2,597,35
National Endowment for the Humanities - Direct National Endowment for the Humanities 45.149 30,60
National Endowment for the Humanities - Total - 30,60
Institute of Museum and Library Services - Direct Institute of Museum and Library Services 45.313 45.85
45,85
Latitude of Management Characters - Days Thomash
Institute of Museum and Library Services - Pass Through Norman Public Schools 45.312 1800488800 26,377
Norman Public Schools 45.312 1700802500 20,377  Norman Public Schools 45.312 1700802500 44,256
Subtotal 45.312 70,63
Institute of Museum and Library Services - Total - 116,48
National Science Foundation - Direct
National Science Foundation 47.041 162,949 1,215,61
National Science Foundation 47.047 86,71
National Science Foundation 47.049 36,940 1,752,70
National Science Foundation 47.050 42,711 2,894,42
N-6 C F
National Science Foundation         47.070         56,655         712,60
National Science Foundation 47.074 49,945 2,292,75
National Science Foundation         47.074         49.945         2,292,75           National Science Foundation         47.075         39,474         449,66
National Science Foundation 47.074 49,945 2,292,75
National Science Foundation         47.074         49,945         2,292,75           National Science Foundation         47.075         39,474         449,66

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTAI CASH B <i>A</i> EXPENDIT	ASIS
National Science Foundation - Pass Through					
Azumuth1, LLC	47.041	FY180RA222		24,000	
George Washington Univeristy	47.041	15S11		7,796	
Oklahoma State University	47.041	AGMT061713		13,884	
Purdue University	47.041	410181104		5,674	
University of Delaware	47.041	33792		147,699	
XPEED Turbine Technology, LLC	47.041	FY170RA544		33,587	
Subtotal					232,640
Clark University	47.049	2A3117531		6,874	
National Radio Astronomy Observatory	47.049	SOSPA4008		14,927	
National Radio Astronomy Observatory	47.049	SOSPA5011		15,551	
University of Notre Dame	47.049	LTR101415		14,766	
University of Texas, Austin	47.049	126510013061		112,699	
Subtotal				<u></u>	164,817
University Corporation for Atmospheric Research	47.050	Z1725728		5,000	
University of Alaska-Fairbanks	47.050	UAF170103		20,554	
University of Michigan	47.050	3003980653		25,024	
Subtotal					50,578
Southern Nazarene University	47.070	FY17ORA512		10,927	
University of California, Santa Barbara	47.070	KK1617		49,528	
University of Illinois at Urbana-Champaign	47.070	02001616461		43,667	
University of Illinois at Urbana-Champaign	47.070	08384216121		55,500	
Subtotal					159,622
Colorado State University	47.074	G25763		20,088	
Michigan State University	47.074	RC107432B		14,964	
Purdue University	47.074	410279745		24,550	
Tulane University	47.074	TULHSC4321213		5,802	
University of California, Davis	47.074	201503777001		63,758	
University of California, Los Angeles	47.074	2301GTB266		55,101	
University of Georgia	47.074	RC3712514353838		63,392	
Subtotal					247,655
University of CA, Merced	47.075	E315GTA021		15,728	
University of South Florida	47.075	2104125800A		6,391	
University of Texas Dallas	47.075	1503120		198,961	
Subtotal					221,080
American Educational Research Association	47.076	LTR013015		5,574	
Oklahoma State University	47.076	1567787		10,389	
Oklahoma State University	47.076	1567797		15,035	
Oklahoma State University	47.076	1569178		30,793	
Oklahoma State University	47.076	AA556595OU		89,288	
Subtotal					151,079
Oklahoma State University	47.079	1560686OU		366,958	
Oklahoma State University	47.079	20172		5,000	
Oklahoma State University	47.079	20173		3,535	
Oklahoma State University	47.079	EPSCOR20171		461	
Oklahoma State University	47.079	EPSCOR201711		56,281	
University of Rhode Island	47.079	4978113015		489,657	
Subtotal					921,892
Oklahoma State University	47.083	EPSCOR201313		2,000	
Oklahoma State University	47.083	EPSCOR201317		79,535	
Oklahoma State University	47.083	EPSCOR201318		488,381	
Oklahoma State University	47.083	EPSCOR201319		508,219	
Oklahoma State University	47.083	EPSCOR201320		50,281	
Oklahoma State University	47.083	EPSCOR20133		15,903	
Oklahoma State University	47.083	EPSCOR20138		2,240	
Oklahoma State University	47.083	EPSCOR201415		3,452	
Oklahoma State University	47.083	EPSCOR201715		211,897	
South Dakota School of Mines and Technology	47.083	SDSMTUOK1805		143,008	
University of Connecticut	47.083	115706		86,979	
Subtotal				_	1,591,895
				-	3,741,258
National Ocionas Foundation: Total					4
National Science Foundation - Total			576,131	-	14,359,082

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTA CASH BA EXPENDIT	ASIS
Environmental Protection Agency - Direct					
Environmental Protection Agency	66.509		85		136,532
Environmental Protection Agency	66.516		00		11,661
<b>5</b> ,			85	-	148,193
Environmental Protection Agency - Total			85	-	148,193
Department of Energy - Direct					
US Department of Energy	81.049		335,730		1,684,034
US Department of Energy	81.087				737
US Department of Energy	81.121		55,958		97,564
US Department of Energy	81.138		391,688	<u>-</u>	51,554 1,833,889
Department of Energy - Pass Through				_	_
Univ of California, Berkley	81.003	6847566			721,941
Brookhaven National Laboratory	81.049	181673		(2)	,
Glomics, Inc.	81.049	FY17ORA543		66,399	
Helios Remote Sensing Systems	81.049	FY18ORA138		26,752	
MicroChem Solutions	81.049	FY13ORA216		153	
Northern Arizona University	81.049	100279201		10,640	
Texas A&M University	81.049	06S150620		30,144	
Univ of California, Berkley	81.049	00008322		10,827	
Univ of California, Berkley	81.049	00009014		371,407	
Univ of California, Berkley	81.049	00009292		116,699	
University Corporation for Atmospheric Research University of Texas, Austin	81.049 81.049	P0004585 UTA15001188		10,990 112,440	
Subtotal	81.049	01A13001100		112,440	756,449
Biodiversity Research Institute	81.087	FY13ORA124			3,920
,,	222.			-	
Department of Energy - Total			391,688	-	1,482,310 3,316,199
				•	
Department of Education - Direct					
US Department of Education	84.324		187,644		382,617
US Department of Education	84.325				111,657
US Department of Education	84.326 84.334		044.774	<u>-</u>	138,973
US Department of Education	64.334		644,774	-	3,081,948
			832,418	-	3,715,195
Department of Education - Pass Through					
Indiana University & Purdue University at Indianapolis	84.004	1939993			13,567
OK Department of Education	84.329	2659014380			17,668
National Writing Project Corporation	84.367	92OK02SEED2016ILI		-	3,683 34,918
Department of Education - Total				-	34,916
			832,418		3,750,113
Department of Health and Human Services - Direct					
National Institutes of Health	93.077		2,278		56,455
National Institutes of Health	93.172		509,729		922,719
National Institutes of Health	93.173				268,513
National Institutes of Health	93.286				421,959
National Cancer Institute	93.394		5,385	285,103	
National Institutes of Health	93.394		485,474	1,150,297	
Subtotal	93.394				1,435,400
National Institutes of Health	93.395		440.070		127,852
National Institutes of Health National Institutes of Health	93.397 93.855		149,873 136,909		301,191 1,162,775
National Institutes of Health	93.856		130,909		1,162,775
National Institutes of Health	93.859		728,996		2,900,423
National Institutes of Health	93.867		. 20,000	-	150,602
			2,018,644	<u>-</u>	7,901,610

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTAL CASH BA EXPENDITU	SIS
Department of Health and Human Services - Pass Through					
Health Sciences Center	93.110	TM2016133902		10,307	
Health Sciences Center	93.110	TS2016133901		10,147	
Subtotal	93.110	74400000			20,454
University of Kansas Medical Center OK Department of Health	93.121 93.136	ZAA00000 3409021712			29,909 20,875
Health Sciences Center	93.273	RS2013194308			17,825
University of Texas Health Science Ctr	93.395	159236/153201		23,334	,
University of Texas Health Science Ctr	93.395	160754/160664		49,474	
University of Texas Health Science Ctr	93.395	162576162378		170,901	
Subtotal	93.395	E)/400E0440			243,709
Nanofiber Solutions Colorado State University	93.838 93.855	FY18ORA142 G641112		111,030	21,939
University of Central Florida	93.855	22206079		137,241	
Subtotal	93.855				248,271
Health Sciences Center	93.859	ATP042517		325,924	,
Health Sciences Center	93.859	RM2013049462		59,525	
Health Sciences Center	93.859	RM2013049463		18,740	
Health Sciences Center	93.859	RM2013049464		18,882	
Health Sciences Center	93.859	RM2016225705		23,578	
Health Sciences Center	93.859	RS2012058951		7,938	
Health Sciences Center	93.859 93.859	RS2013049440		15,895	
Indiana University & Purdue University at Indianapolis Laureate Institute for Brain Research	93.859	IN4698014OK FY18ORA545		45,177 1,094	
University of Arkansas	93.859	SA1701154		60,654	
University of Arkansas	93.859	9663SC		3,715	
Subtotal	93.859				581,122
Oklahoma State University	93.865	1568327OU			41,097
Health Sciences Center	93.866	RS2014089203			18,366
Johns Hopkins University	93.989	2003124170		_	15,314
				_	1,258,881
Department of Health and Human Services - Total			2,018,644		9,160,491
				_	
TOTAL RESEARCH AND DEVELOPMENT PROGRAMS *			10,478,660	-	68,809,137
OTHER PROGRAMS					
Department of Agriculture - Pass Through					
Oklahoma State University	10.001	AB568330OU			225,579
OK Department of Human Services	10.580	PO0210422			3,102
			<u>-</u>	_	228,681
Department of Agriculture - Total			<u> </u>		228,681
<b>.</b>					
Department of Commerce - Direct  Economic Development Administration	11.303				70.070
National Oceanic and Atmospheric Administration	11.432				72,373 120,900
National Gooding and Autoophone Administration	11.402		_		193,273
				_	100,2.10
Department of Commerce - Total			<u> </u>	-	193,273
Department of Defense - Direct					
Dept of Defense, Defense Intelligence Agancy	12.598		_		240,496 240,496
Department of Defense - Pass Through				_	240,400
	12 550	00540164884280801		264 207	
Institute of International Education	12.550	0054OU6ARA280PO1		261,307	
Institute of International Education	12.550	0054OU6SSA280PO3		73,746	
Subtotal Health Sciences Center	12.550 12.598	ATP090817		7,633	335,053
Health Sciences Center Health Sciences Center	12.598	TS2014152604		7,633 11,878	
Subtotal	12.598	. 5201-10200-		11,070	19,511
				_	354,564
				_	
Department of Defense - Total				_	595,060

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTAL CASH BA: EXPENDITU	SIS
Denoutment of Interior Direct					
Department of Interior - Direct Bureau of Reclamation	15.511				32,690
Fish and Wildlife	15.669				8,001
Geological Survey	15.820		655		75,796
National Park Service	15.922		000		83,862
			655	_	200,349
Department of Interior - Total			655	_	200,349
Department of State - Direct					
Department of State	19.022				71,766
Department of State	19.415				805,726
Department of State	19.501				66,718
					044.040
				_	944,210
Department of State - Total				_	944,210
Department of Transportation - Direct					
Federal Aviation Administration	20.106				215,447
Federal Aviation Administration	20.109				322,939
Federal Highway Administration	20.215				4,000
Federal Transit Administration	20.507				1,675,087
				<del>-</del>	2,217,473
Department of Transportation - Pass Through					
OK Department of Transportation - Pass Through	20.200	2161			46,523
·				_	-,
					40.500
			<del></del>	_	46,523
Department of Transportation - Total				_	2,263,996
National Assessation and Course Administration. Direct					
National Aeronautics and Space Administration - Direct Shared Services Center	43.008		705.055		4 000 040
Shared Services Center	43.000		785,955 785,955	_	1,003,242 1,003,242
				_	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
National Aeronautics and Space Administration - Pass Through					
Langston University	43.008	LU5-58015-3		13,751	
Langston University	43.008	PO0105684		5,831	
Subtotal	43.008			_	19,582
				_	19,582
National Aeronautics and Space Administration - Total			785,955	_	1,022,824
National Endowment for the Humanities - Direct					
National Endowment for the Humanities	45.160				(10,615)
National Endowment for the Humanities	45.162				16,626
National Endowment for the Humanities - Total				<u>-</u>	6,011
				_	
Institute of Museum and Library Services - Direct Institute of Museum and Library Services	45.301				26,061
modulo o maccam ana Elbiar, comoco	10.001			_	20,001
					26,061
Institute of Museum and Library Services - Pass Through					
University of Wisconsin	45.312	787K124			13,915
Onliversity of Wisconsin	43.312	70710124		<del>-</del>	13,915
				_	
Institute of Museum and Library Services - Total				_	39,976
National Science Foundation - Direct					
National Science Foundation	47.041				14,636
National Science Foundation	47.049				7,040
National Science Foundation	47.074				53,091
National Science Foundation	47.075				6,417
National Science Foundation	47.076				11,028
				_	*****
				_	92,212

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTA CASH B EXPENDIT	ASIS
National Science Foundation Bose Through					
National Science Foundation - Pass Through Oklahoma State University	47.076	AGR110317		8,591	
Oklahoma State University	47.076	AGR121416		15,369	
Subtotal	47.076			,	23,960
					.,,
					23,960
Netheral October Foundation Table					
National Science Foundation - Total					116,172
Small Business Administration - Direct					
Small Business Administration	59.058				82,851
Small Business Administration - Total			-		82,851
Department of Energy - Direct					
Department of Energy	81.089				4,846
Boundary of Foreign Total					4.040
Department of Energy - Total					4,846
Department of Education - Direct					
STUDENT FINANCIAL ASSISTANCE CLUSTER					
Pell	84.063		894,472		23,631,039
SEOG	84.007		49,000		495,877
TEACH	84.379		·		476,735
College Work-Study	84.033			1,779,384	
Job Location and Development Program	84.033			47,000	
	Subtotal 84.033				1,826,384
Federal Perkins Loan Program	84.038		405,350		15,549,712
Federal Direct Student Loans	84.268				127,066,622
TOTAL STUDENT FINANCIAL ASSISTANCE			1,348,822		169,046,369
TRIO CLUSTER	04.040				
Department of Education - TRIO	84.042 84.047				92,623
Department of Education - TRIO Department of Education - TRIO	84.217				258,494 196,914
TOTAL TRIO	04.217		<u> </u>		548,031
TOTAL TRIO					340,031
US Department of Education	84.283				3,006,447
US Department of Education	84.325				472,506
					3,478,953
Department of Education - Pass Through					
OK Department of Education	84.206	2659017146			11,104
OK Department of Education	84.305	2659016675			69,938
Putnam City Public Schools	84.366	317120721			(656)
OK State Regents for Higher Education	84.367	201718ESEA		7,289	()
		92OK02SEED2018C3			
National Writing Project Corporation	84.367	WPPD		4,361	
OK State Regents for Higher Education OK State Regents for Higher Education	84.367	201718ESEA ESEA		106,901	
OK State Regents for Higher Education OK State Regents for Higher Education	84.367 84.367	ESEA ESEA2018		122,202 29,674	
Subtotal	84.367	_3_, _0, 10		20,014	270,428
Miko Group	84.371	AGR92513			45,422
National Writing Project Corporation	84.411	920K022017I3AI			20,052
- · ·					· ·
					416,288
Description of Education Total					
Department of Education - Total			4 0 40 000		470 400 041
			1,348,822		173,489,641

	FEDERAL CFDA	Pass-THRU IDENTIFYING NUMBER	AMOUNT PROVIDED TO SUBRECIPIENTS	TOTAL CASH BASIS EXPENDITURES
Department of Health and Human Services - Direct Substance Abuse and Mental Health Services Administration Substance Abuse and Mental Health Services Administration	93.276 93.243			130,369 345,183 475,552
Department of Health and Human Services - Pass Through OK Department of Mental Health OK Department of Mental Health	93.243 93.959	PO4529049840 PO4529050213		207,163 147,916
				355,079
Department of Health and Human Services - Total				830,631
Social Security Adminstration - Direct Social Security Adminstration	96.008		<u>-</u>	249,388 249,388
Social Security Adminstration - Total			-	249,388
Department of Homeland Security - Pass Through				
Department of Homeland Security - Total			<u> </u>	<u>-</u>
TOTAL OTHER PROGRAMS			2,135,432	180,267,909
TOTAL FEDERAL FINANCIAL ASSISTANCE			\$ 12,614,092	\$ 249,077,046

<sup>\*</sup>Denotes Research and Development Cluster major program.

<sup>\*\*</sup>Subtotal of CFDA 10.310 is \$1,038,023.

#### Note 1 -- Basis of Presentation and Significant Accounting Policies

The purpose of the Schedule of Expenditures of Federal Awards (the "Schedule") is to present a summary of the activities of The University of Oklahoma Norman Campus (the "University") for the year ended June 30, 2018, which have been financed by the Government.

For purposes of the Schedule, federal awards have been classified into two types:

- Direct federal awards consisting of federal assistance and federal student financial aid, and
- Pass-through funds received from non-federal organizations made under federally sponsored programs conducted by those organizations.

Because the schedule presents only a selected portion of the activities of the University, it is not intended to and does not present either the financial position, changes in fund balances or the current funds revenues, expenditures or other changes of the University.

The schedule is prepared on the cash basis of accounting. Expenditures are recognized when paid.

Federal awards provided to subrecipients are treated as expenditures when paid to the subrecipient.

The University has not elected to use the 10% de minimus cost rate.

Complete Catalog of Federal Domestic Assistance ("CFDA") numbers are presented for those programs for which such numbers were available. CFDA prefixes are presented for programs for which a complete CFDA number is not available.

Federal direct programs are presented by federal department and, where applicable, the funding agency within the department. Federal pass-through programs are presented by the entity through which the University received the federal award. Amounts provided to subrecipients from each federal program have been separately identified for additional analysis. These pass-through awards are included in total cash basis expenditures.

The University of Oklahoma Norman Campus administers Academic Competitiveness Grants, the Pell Grant program, Supplemental Education Opportunity Grants, National Science and Mathematics Access to Retain Talent Grants and College Work-Study student award programs for students attending both the Norman and Health Sciences Center campuses of the University. Grant revenues and expenditures under such programs for students attending these campuses are included in the financial statements of the Norman Campus. Therefore, the Norman Campus Schedule of Expenditures of Federal Awards includes expenditures under such programs for students attending these campuses.

Federal Contracts that do not meet the definition of Federal Domestic Assistance (i.e.: the United States Postal Service, the Oklahoma State Department of Human Services' Satellite Training Network ("SATTRN") and IV-E Social Work programs) have been excluded from the schedule as it was determined, based upon discussions with the University's federal cognizant agency or by the nature of the contract, that such contracts do not represent auditable federal awards under the provisions of Uniform Guidance. Also, fixed price and fixed rate programs have been excluded.

#### Note 2 -- Federal Direct Student Loan Program

Under the Federal Direct Student Loan Program ("Direct Loan Program"), the U.S. Department of Education makes loans to enable a student or parent to pay the costs of the student's attendance at a postsecondary school. The Direct Loan Program enables an eligible student or parent to obtain a loan to pay for the student's cost of attendance directly from the U.S. Department of Education rather than through private lenders. The University began participation in the Direct Loan Program on July 1, 2010. The University administers the origination and disbursement of the loans to eligible students or parents. The University is not responsible for the collection of these loans.

#### Note 3 -- Federal Perkins Loan Program

The Federal Perkins Loan Program is administered directly by the University. The beginning balance of loans outstanding (as of July 1, 2017) plus disbursements made to students during the year ended June 30, 2018, has been included as federal expenditures in the schedule. As of June 30, 2018, the ending balance of the loans receivable under the Federal Perkins Loan Program was approximately \$15.9 million.

#### Section I – Summary of Auditor's Results

**FINANCIAL STATEMENTS** 

Type of auditor's report issued

Unmodified

Internal control over financial reporting:

Material weaknesses identified No

Significant deficiencies identified not considered

to be material weaknesses Yes

Noncompliance material to financial statements noted?

FEDERAL AWARDS

Internal control over major program:

Material weaknesses identified Yes

Significant deficiencies identified not considered

to be material weaknesses No

Type of auditor's report issued on compliance for major programs: Unmodified

Any audit findings disclosed that are required to be reported in

accordance with Uniform Guidance 2 CFR 200.516: Yes

**Identification of major programs:** 

Name of Federal Program CFDA Number

Student Financial Aid Cluster 84.063; 84.007; 84.379

84.003; 84.038; 84.268

Research and Development Cluster \*

Comprehensive Centers 84.283B

\* See the Schedule of Expenditures of Federal Awards for identification of CFDA numbers applicable to this major program.

Dollar threshold used to distinguish between type A

and type B programs: \$ 2,401,038

Auditee qualified as low-risk auditee?

#### Section II – Financial Statement Findings

2018-A Splitting Procurement Card Transactions to Below Procurement Levels Significant Deficiency in Internal Control over Financial Reporting

Criteria: Per the Regents' Policy Manual:

> Unless otherwise exempt, purchases above \$5,000 and not exceeding \$50,000 must be processed through the Purchasing Department. If competition is required, it must be conducted formally.

Splitting orders to avoid this dollar limit is prohibited.

Condition: We selected procurement card (P-card) transactions that appeared to occur on the same date with

the same vendor that could indicate a violation of University policy. We selected 10 transactions under the \$5,000 threshold that occurred on 5 dates and found that purchase date and time, vendor and amount spent appeared to be in excess of the \$5,000 limit for each date selected that requires procurement policies to be followed. Our procedures indicate that this was a violation in one

department of the University.

Cause: P-card transactions with certain vendors were split into more than one transactions that kept such

transactions under the \$5,000 threshold that would require formal procurement policies.

Effect: The policies of the Regents' Policy Manual were not followed and a formal bid process may have

resulted in a more economical transactions had those policies been followed.

Recommendation:

We recommend that management evaluate controls around P-card use and review of such use to ensure formal University policies are followed and proper bid procedures take place

Views of Responsible Officials:

Management acknowledges the finding and have already implemented procedures for proper

controls to be put in place.

#### Section III - Federal Award Findings and Questioned Costs

2018-001 Suspension and Debarment Control

**Research and Development Cluster** 

**Compliance Requirement: Suspension and Debarment Material Weakness in Internal Control over Compliance** 

Criteria:

Non-Federal entities are prohibited from contracting with or making subawards under covered transactions to parties that are suspended or debarred. "Covered transactions" include those contracts for goods and services awarded under a non-procurement transaction (e.g., grant or cooperative agreement) that are expected to equal or exceed \$25,000 or meet certain other criteria as specified in 2 CFR section 180.220. All non-procurement transactions entered into by a pass-through entity (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions, unless they are exempt as provided in 2 CFR section 180.215.

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, as defined in 2 CFR section 180.995 and agency adopting regulations, is not suspended or debarred or otherwise excluded from participating in the transaction. This verification may be accomplished by (1) checking the Excluded Parties List System (EPLS) maintained by the General Services Administration (GSA) and available at https://www.sam.gov/portal/public/SAM/, (2) collecting a certification from the entity, or (3) adding a clause or condition to the covered transaction with that entity (2 CFR section 180.300).

Condition:

During the fiscal year ended June 30, 2018, it appears that controls in place to check all vendors for potential suspension and/or debarment for covered transactions needed to be more complete and more consistent.

We inspected several University-level policies to indicate that more complete and consistent controls over suspension and debarment have been put in place as of July 1, 2018 in compliance with the new procurement policies required under the Uniform Guidance, which became effective for the University on that date. However, such policies have not yet been subject to formal audit procedures.

Cause:

While the University-level policies referenced above were developed in direct response to the similar finding (2017-001) for the fiscal year ended June 30, 2017, their effective date came after the fiscal year ended June 30, 2018. It should be noted that controls over suspension and debarment appear to be in place with regards to subrecipients and equipment purchases.

Effect:

The University was not in total compliance with federal requirements regarding suspension and debarment controls.

Context/Sampling: Sixteen of the 20 covered transactions in our nonstatistical sample did not appear to have a

control in place to identify the vendor as suspended or debarred prior to transacting with

that vendor.

No vendors selected in our test work for the fiscal year ended June 30, 2018 were listed as

suspended or debarred.

Repeat Finding

From Prior Year: Yes, 2017-001

Questioned costs: None, no vendors in our samples were listed as suspended or debarred.

Recommendation: Control procedures should be implemented to ensure that all vendors under covered

transactions are checked against the federal website for vendors that could be suspended or debarred prior to transacting with such vendors or another process as allowed by the

federal regulations discussed above.

Views of Responsible Officials:

We agree with the condition and cause noted. In response to last year's finding we immediately began development of policies to implement a more complete and consistent system of controls to check for debarred and/or suspended vendors. Those policies have been in effect since July 1, 2018, the University's effective date for complying with the Procurement Standards within the Uniform Guidance. We greatly appreciate the auditors' recommendations relative to these efforts. With purchase orders, we will check for debarment and/or suspension on <u>all</u> covered transactions, regardless of funding source, prior to release. We have incorporated the required clauses into our solicitation documents.

2018-002 Direct Program from U.S. Department of Education

Student Financial Aid Cluster (CFDA #'s 84.268, 84.038, 84.379, 84.063, 84.033,

84.007)

**Special Tests: Enrollment Reporting** 

**Material Weakness in Internal Control over Compliance** 

Criteria: A student's enrollment status determines eligibility for in-school status, deferment, and

grace periods, as well as for the payment of interest subsidies to FFEL Program loan holders by ED. Enrollment Reporting in a timely and accurate manner is critical for effective management of the programs. Enrollment information must be reported within 30 days whenever attendance changes for students, unless a roster will be submitted

within 60 days.

Condition: In our student testing, there were students that had a change in enrollment status (i.e.

withdrawal, graduation, reduction from fulltime to part-time). We identified instances where status changes that were not reported to the Department of Education's National Student Loan Data System (NSLDS) within the 60 day time requirement, status changes that had not been reported to NSLDS as of testwork, and instances where the status

change date per the institution's records did not agree to the NSLDS records.

Questioned

Costs: None reported.

Effect: Untimely and inaccurate reporting of student enrollment status does not allow the

Department of Education to properly track and monitor students, including initiation of

the loan repayment process.

Cause: Internal controls do not appear to be in place to accurately and timely identify the

relevant dates for reporting to NSLDS.

Repeat finding From Prior Year:

Yes, 2017-003, 2016-002, 2015-001

Context: Out of the 74 sample of enrollment status changes, 15 status changes had one or a

combination of exceptions. These include 10 of the status change dates did not agree with NSLDS, 5 of the status changes had not been reported to NSLDS as of our testwork, and 2 status changes were not reported to NSLDS within the time required by the federal

regulations. Non-statistical sampling was used.

Recommendation:

We recommend that management update their control processes to ensure that the proper status date changes are being reported to NSLDS.

Views of Responsible Officials:

Management has started corrective actions to address these issues for Fall 2018 submission of files.

2018-003 Direct Program from U.S. Department of Education

Student Financial Aid Cluster (CFDA #'s 84.268, 84.038, 84.379, 84.063, 84.007)

**Special Tests: Return of Funds** 

**Material Weakness in Internal Control over Compliance** 

Criteria:

When a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV aid earned by the student as of the student's withdrawal date. If the total amount of Title IV assistance earned by the student is less than the amount that was disbursed to the student or on his/her behalf as of the date of the institution's determination that the student withdrew, the difference must be returned to the Title IV programs as outlined by the regulations. If the amount the student earned is greater than the amount disbursed, the difference between the amounts must be treated as a post-withdrawal disbursement (34 CFR species 668 22(a)(1) through (a)(5))

section 668.22(a)(1) through (a)(5)).

Condition: We identified instances where the incorrect date was used to calculate the return of funds that

resulted in an incorrect calculation of funds to be returned. Three of these instances resulted in

funds due back to the students and one instance was an over-awarded amount to the student.

Cause: Internal controls do not appear to be in place to accurately and timely identify the relevant dates

for return of fund calculation purposes.

Effect: Use of improper dates in the return of funds calculation will likely result in incorrect calculations

and inaccurate return of funds.

**Question** 

Costs: None reported.

Context/Sampling:

Five withdrawals in our sample of 60 withdrawals had an incorrect calculation of the return of funds due to an improper date being used for the calculation. Non-statistical sampling was used.

Repeat Finding from Prior Year:

Yes, 2017-004

Recommendation:

We recommend that management update their control processes to ensure that the proper status date changes are being used for return of funds calculations.

Views of Responsible Officials:

Management agrees with the finding and will implement corrective measures.

2018-004 Direct Program from U.S. Department of Education

Student Financial Aid Cluster (CFDA #'s 84.268, 84.038, 84.379, 84.063, 84.007)

**Special Tests: Verification** 

**Material Weakness in Internal Control over Compliance** 

Criteria: An institution not participating under an ED-approved Quality Assurance Program (QAP) is

required to establish written policies and procedures that incorporate the provisions of 34 CFR sections 668.51 through 668.61 for verifying applicant information. Such an institution shall require each applicant whose application is selected by ED to verify the information required for

the Verification Tracking Group to which the applicant is assigned.

Condition: We noted instances in our sample of students selected for verification where the Institution either

did not obtain the correct verification documents or the verified student information that differed

for the original information was not accurately updated to the student's information.

Questioned

Costs: None reported.

Effect: Inadequate controls over obtaining, reviewing and updating student verification information will

likely result in incorrect award calculations.

Cause: Internal controls do not appear to be effective in ensuring proper verification documentation is

obtained and student data is updated accordingly.

Context: There were exceptions in four of the 60 verifications sampled. There were three instances where

the proper verification was received by the Institution and differed from the original student information but the student's information was not properly updated. There was one instance where proper verification documentation was not obtained by the Institution. Non-statistical

sampling was used.

Repeat Finding from Prior

Year: No

#### Recommendation:

We recommend that management update their control processes to ensure that proper documentation is received, and information is updated accurately.

#### Views of

#### Responsible Officials:

Management agrees with the finding and has implemented procedures to assure we accurately submit the correct students in our future files.