Northern Oklahoma College
Tonkawa, Oklahoma

Internal Audit Report

Fiscal Year 2013–2014
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Summary of Procedures Performed</td>
<td>I</td>
</tr>
<tr>
<td>and Results Thereof</td>
<td>1</td>
</tr>
<tr>
<td>Expenditures</td>
<td>II</td>
</tr>
<tr>
<td>Travel Claims</td>
<td>II</td>
</tr>
<tr>
<td>Property Rentals</td>
<td>II</td>
</tr>
<tr>
<td>Payroll</td>
<td>II</td>
</tr>
<tr>
<td>Cashier</td>
<td>II</td>
</tr>
<tr>
<td>Activity Advances</td>
<td>II</td>
</tr>
<tr>
<td>Bookstore</td>
<td>II</td>
</tr>
<tr>
<td>Data Extraction</td>
<td>II</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY OF PROCEDURES PERFORMED AND RESULTS THEREOF

We performed the procedures detailed in the attached report to assist the Board of Regents and management of Northern Oklahoma College (the “College”) in maintaining an effective internal control system for the College. The following is a brief summary of the areas in which testwork was performed and the results.

Expenditures

Procedures Performed

We reviewed the College’s policies and procedures used for expenditures to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the process. We conducted interviews with personnel involved in the process.

We selected 30 expenditures from the E&G (290) Fund and 30 expenditures from the Auxiliary (700) Fund from July 1, 2013, through May 31, 2014. We utilized ACL (Audit Data Extraction software) to assist in making selections. All selections were examined for adequate supporting documentation, reviewed for proper approval in accordance with applicable policy, and verified to be properly recorded.

Results

No exceptions were noted.

Travel Claims

Procedures Performed

We reviewed the College’s policies and procedures used for travel claims to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the process. We conducted interviews with personnel involved in the process.

We selected 30 travel claims from July 1, 2013, through May 31, 2014. We utilized ACL (Audit Data Extraction software) to assist in making selections. All selections were examined for adequate supporting documentation, reviewed for proper approval in accordance with applicable policy, and verified to be properly recorded.

Results

No exceptions were noted.
EXECUTIVE SUMMARY OF PROCEDURES
PERFORMED AND RESULTS THEREOF, CONTINUED

Property Rentals

Procedures Performed

We reviewed the policies and procedures used to administer property rental transactions to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the processes. We also conducted interviews with personnel involved in the process.

We received an inventory housing list of 33 rental units provided by the College. We reviewed all property rental documents and examined the details within each of the rental properties that support and approve the leasing transaction process. We sighted 28 rental properties and 4 vacant lots where houses were demolished, to verify existence. We will sight the Enid property at a later date.

Results

No exceptions were noted.

Payroll

Procedures Performed

We reviewed the policies and procedures used to administer Payroll’s operations to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the payroll process. We conducted interviews with personnel involved in the Payroll operations, including Human Resources, Accounting, and other persons involved in the process.

We randomly selected 60 employees from the Master File Employee Report dated July 1, 2013, through May 31, 2014. For each employee selected, we obtained documentation that properly supports employee hiring, contract, and wage qualifications.

Results

No exceptions were noted.
EXECUTIVE SUMMARY OF PROCEDURES
PERFORMED AND RESULTS THEREOF, CONTINUED

Cashier

Procedures Performed

We reviewed the College’s policies and procedures for the cashier processes, daily balancing, including voided transactions and postdating of transaction’s to ensure that they were effective and efficient. We reviewed the cashiers’ daily functions to determine that proper segregation of duties, proper reconciliation of reports and proper review was occurring. We documented procedures used, conducted a “walk through” of cashier operations, and observed the process. We conducted interviews with personnel involved in the process.

A selection was made from bookstore deposits and activity advances for cashier testwork (see Bookstore and Activity Advances sections). All selections were agreed to proper supporting documentation and reports, reviewed to determine whether proper cashier procedures were adhered to, traced to applicable bank statement, and verified to properly reconciled and properly recorded.

A selection of transactions from the Discrepancy Reports was made for testwork. All selections were examined for adequate supporting documentation, reviewed for proper approval and verified to be properly recorded. In addition, all discrepancy reports (showing voided and postdated transactions made by the cashiers) from January 28, 2014, through May 31, 2014, were reviewed to verify the reports were properly reviewed, worked, and considered to be proper by a supervisor.

Results

We noted the same employee who can receive cash also posts payments to student and other accounts within the Poise system, reconciles daily cash receipts, prepares the deposit, and takes the deposit to the bank.

We noted each cashier has the ability to void transactions without first obtaining proper approval from a supervisor.

Management’s Response

A new POISE report was recently created that enables an accountant to verify and audit the daily work of each cashier. The report shows the composition (cash, check, or credit card) for each cashier. Another report that is reviewed by the accountant shows any voiding activity for all cashiers. Each of these reports is printed daily, audited, and signed by the accountant.
EXECUTIVE SUMMARY OF PROCEDURES
PERFORMED AND RESULTS THEREOF, CONTINUED

Cashier, Continued

Management’s Response, Continued

The head cashier in Tonkawa summarizes daily activity for all campuses. The Enid and Stillwater campuses have one cashier responsible for the cash drawer on each respective campus. It is not practical at this time to add an additional cashier for the sole purpose of splitting the duties of posting payments, preparing and taking daily deposits, when the work load on a daily basis does not warrant hiring additional personnel.

It is customary for cashiers to consult with the Coordinator for Student Accounts (“Coordinator”) prior to voiding a transaction. Cashiers also need capability to void a transaction on days when the Coordinator is not in the office, so that daily balancing can be accomplished. The accountant reviews the report showing voiding activity for the day, and discusses any questionable voids with the cashier who processed the void. The accountant notes the reason for any unusual voiding activity on the report and signs off once satisfied that each void is appropriate.

Activity Advances

Procedures Performed

We reviewed the College’s policies and procedures for Activity Advances (including the cashier process), to ensure that they were effective and efficient. We reviewed the daily process related to activity advances for sponsors, cashiers, and accounting personnel to determine that proper segregation of duties, proper reconciliation of reports, and proper review was occurring. We documented procedures used, performed a “walk through” of operations, and conducted interviews with personnel involved in the process.

A selection of 50 activity advances from the Activity Advance Detail Report from July 1, 2013, through May 31, 2014, was made for testwork. All selections were examined for adequate supporting documentation, reviewed to verify proper cashier procedures were followed, reviewed for proper receipt and approval in accordance with applicable policy, traced to applicable bank statement, and verified to be properly reconciled and properly recorded.
EXECUTIVE SUMMARY OF PROCEDURES
PERFORMED AND RESULTS THEREOF, CONTINUED

Activity Advances, Continued

Results

We noted no supporting documentation was provided for two separate cash activity advances, totaling $2,875.

Also, exceptions noted specifically for cashier process; see Results in Cashier section.

Management’s Response

The two activity advances noted above were identified by NOC at the time a special audit was underway by Crawford & Associates, P.C. NOC identified the activity advances and discussed details of the activity and the expenditure of funds with the faculty/coaches involved with each advance. Each item was reviewed by NOC management and Crawford personnel. In each instance it was determined that documents had been destroyed by NOC’s cashier on administrative leave at that time. The former employee admitted to law enforcement that she had destroyed records and that she had taken missing monies. These items were also identified by Finley & Cook, PLLC, through the course of their examination, and are listed above accordingly since they occurred during the internal audit period being examined.

Bookstore

Procedures Performed

We reviewed the College’s policies and procedures for bookstore deposits (including the cashier process), for bookstore expenditures, inventory, and sales to ensure that they were effective and efficient. We reviewed the daily bookstore functions to determine that proper segregation of duties, proper reconciliation of reports and proper review was occurring. We documented procedures used, conducted a “walk through” of bookstore operations, and observed the process. We conducted interviews with personnel involved in the process.

We selected 32 deposits for the Tonkawa bookstore and 32 deposits for the Enid bookstore from the Daily Transaction Reports. All selections were agreed to proper supporting bookstore and cashier reports, reviewed to verify proper cashier procedures were adhered to, traced to applicable bank statement, and verified to be properly reconciled and properly recorded.
EXECUTIVE SUMMARY OF PROCEDURES PERFORMED AND RESULTS THEREOF, CONTINUED

Bookstore, Continued

Procedures Performed, Continued

A selection of 30 expenditures for the Tonkawa bookstore and 30 expenditures for the Enid bookstore was made from the E&G (290) Fund from July 1, 2013, through May 31, 2014, for testwork. We utilized ACL (Audit Data Extraction software) to assist in making selections. All selections were examined for adequate supporting documentation, reviewed for proper receipt and approval in accordance with applicable policy, and verified to be properly recorded.

Analytical procedures were applied to bookstore sales and inventory expenditures in relation to the number of students enrolled for a 3-year period. Any unusual variances were reviewed and were determined to be reasonable.

Results

Exceptions noted specifically for cashier process; see Results in Cashier section.

Data Extraction

Procedures Performed

Computer auditing techniques were used to assist in tests of expenditures and payroll. We used our ACL software to:

- Perform Benford analysis for all E&G (290) Fund and Auxiliary (700) Fund expenditures.
- Review for possible duplicate payments.
- Review for possible missing checks for Auxiliary (700) Fund.
- Review for duplicate addresses for payroll expenditures.
- Review for duplicate social security numbers for payroll expenditures.

Results

All possible instances of abnormalities were examined and resulted in no findings.
EXECUTIVE SUMMARY OF PROCEDURES
PERFORMED AND RESULTS THEREOF, CONTINUED

Follow-Up on Recommendations

During 2014, the College hired a firm to perform certain consulting services to assist in evaluating the controls surrounding activity advances, their use, and subsequent collection and documentation of any excess cash returned to the cashier (in the Bursar’s office).

There were four recommendations as a result of the procedures performed, and we inquired of management regarding the progress on implementing the suggestions, see below.

Prior Recommendation No. 1:

Recommend an independent review of audit log showing discrepancies between date stamp and transaction date.

Follow-Up:

A sort on POISE is run to identify time and date stamp for deposits. The results of the sort is imported into Excel, where the large amount of data is reviewed for any date differences between the time & date stamps and the actual date recorded on POISE. The sort is run, the report reviewed and initialed by the Coordinator for Student Accounts monthly.

Prior Recommendation No. 2:

Recommend Daily Balancing Reports to be modified to include compositions (cash, check, credit card), and be reviewed with evidence of review.

Follow-Up:

Bookstore has modified their daily reports to show their totals by tender. Consistent coding has been adopted by cashiers to now be able to verify their daily deposit by composition (cash, check, credit card). This daily report is initialed by each cashier and then reviewed by the head cashier as she compiles all the daily reports to the daily summary.
Follow-Up on Recommendations, Continued

Prior Recommendation No. 3:

Recommend an independent review and reconciliation of cashier activity to the amount deposited and also recommend the cashier and reviewer signoff on cashier’s activity form as evidence both are occurring.

Follow-Up:

A request has been made with our POISE software vendor to modify our daily reports to show totals at the end of the report. Once the report modification has been fulfilled by the vendor, the accountant will verify and initial the totals at the end of the report with the daily deposit ticket and credit card receipts.

Prior Recommendation No. 4:

Recommend proper segregation of duties related to maintenance of cash advance documentation, cash advance monitoring, and cash advance follow-up for any outstanding advances when the excess cash advance or documentation is received by the Bursar’s office.

Follow-Up:

When coaches/faculty return activity advance funds to the cashier’s window, the cashier now counts the total cash returned in the presence of the coaches/faculty, and the coaches/faculty signs off on the form to verify the amount of cash returned. The cashier reviews the returned receipts and compiles the packet of completed forms and returned cash receipts for presentation to the accountant for audit. The accountant audits and verifies the documentation, and initials upon acceptance of documents as presented. Coaches/faculty are notified by accountant of any problems identified during audit. This procedure was put in place by early February and activity advance forms were modified to accommodate various initials/signatures as required. (Note: The procedure of counting cash and verifying receipts/documents with coaches/faculty was already being practiced on Enid campus. It was the assumption of management that Tonkawa campus was following same steps, when, in fact, this was not being done.)
EXPENDITURES

Audit Approach

As an element of Northern Oklahoma College’s (the “College”) core business function, expenditures will be audited using the risk-based approach. The audit will only address expenditures as defined by the generation of pay (State of Oklahoma, Office of State Treasury).

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with Accounting, Purchasing, and Student Accounts management and key personnel; expenditures processed from July 1, 2013, through May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing, and reporting of expenditures, plus supporting documentation required to support the expenditures for the College’s departments; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding of significant processes and practices employed in administering the expenditure function, specifically addressing the following components:

- Management philosophy, operating style, and risk assessment practices.
- Functional and organizational structure relating to delegation of authority and responsibility.
- Positions of accountability for financial and programmatic results.
- Purchasing policies, standard practices and procedures.
- Expenditures are properly coded.
- Vendor invoicing and College review and approval processes.
- College payment processes.
- Management review of edits and checks to enable identification of unusual or unexpected transactions.
- Conflicts of interest.
EXPENDITURES, CONTINUED

Audit Objectives, Continued

- Controls over the expenditure process are evaluated.
- Evaluate the local compliance with the following requirements:
  - Financial/Accounting Policies and Procedures Manual,
  - College’s expenditure policies,
  - Authorization limits, and
  - Applicable federal/state rules and regulations.

Summary of Policies and Procedures

Accountability for expenditure control purposes is the delegation of authority to qualified persons to initiate, approve, process and review expenditure transactions and the holding of those persons responsible for the validity, correctness, and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

Summary of Control Features of Internal Controls

Segregation of Duties: Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of any expenditure transaction process.

Authorization and Approval: Expenditure transactions are authorized by a person delegated approval authority consistent with policy.

Review and Reconciliation: Expenditure records are routinely examined and reconciled to determine that transactions were properly processed. The person performing the review signs and dates the expenditure report to signify that the review has been satisfactorily completed and any discrepancies resolved.

Physical Security: Expenditure records are secured and locked in filing cabinets and are only accessible to designated personnel.
EXPENDITURES, CONTINUED

Summary of Control Features of Internal Controls, Continued

Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level expenditure policies and operating procedures are formalized and communicated to employees. Management adheres to documenting expenditure policies and procedures and making them accessible to employees. This helps provide day to day guidance to staff and has promoted continuity of expenditure activities.

Internal Audit Procedures Performed

Procedures Performed

We reviewed the College’s policies and procedures used for expenditures to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the process. We conducted interviews with personnel involved in the process.

We selected 30 expenditures from the E&G (290) Fund and 30 expenditures from the Auxiliary (700) Fund from July 1, 2013, through May 31, 2014. We utilized ACL (Audit Data Extraction software) to assist in making selections. All selections were examined for adequate supporting documentation, reviewed for proper approval in accordance with applicable policy and verified to be properly recorded.

Audit Limitations

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud is the responsibility of management.

Findings and Recommendations

None.
TRAVEL CLAIMS

Audit Approach

As an element of the College’s core business function, Travel Claims will be audited using the risk-based approach. The audit will only address travel as defined by the generation of pay (State of Oklahoma, Office of State Finance).

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with Accounting management and key personnel; travel claims processed from July 1, 2013, through May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing, and reporting of travel plus supporting documentation required to support the travel expenses for the College’s departments; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding and evaluate travel expense control processes, specifically addressing the following areas:

- Travel authorization and processes.
- Functional and organizational structure relating to delegation of authority and responsibility.
- Data recording and reporting.
- Travel expense payment processes for compliance with College travel policies.
- Other processes, as needed.
- Compliance with applicable Federal and State rules and regulations.
TRAVEL CLAIMS, CONTINUED

Summary of Policies and Procedures

Accountability for travel claim control purposes is the delegation of authority to qualified persons to initiate, approve, process, and review travel reimbursement transactions, and the holding of those persons responsible for the validity, correctness, and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

Summary of Control Features of Internal Controls

Segregation of Duties: Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of any travel claim transaction process.

Authorization and Approval: Request for travel reimbursements must first be pre-approved and are then authorized by a person delegated approval authority consistent with policy.

Review and Reconciliation: Travel claim records are routinely examined and reconciled to determine that reimbursements were properly processed. The person performing the review signs and dates the report to signify that the review has been satisfactorily completed and any discrepancies resolved.

Physical Security: Travel claim records are secured and locked in the vault and are only accessible to designated personnel.

Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level travel reimbursement policies and operating procedures are formalized and communicated to employees. Management adheres to documenting travel reimbursement policies and procedures and making them accessible to employees. This helps provide day to day guidance to staff and has promoted continuity of travel reimbursement activities.
INTERNAL AUDIT REPORT, CONTINUED

Fiscal Year 2013–2014

TRAVEL CLAIMS, CONTINUED

Internal Audit Procedures Performed

Procedures Performed

We reviewed the College’s policies and procedures used for travel claims to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the process. We conducted interviews with personnel involved in the process.

We selected 30 travel claims from July 1, 2013, through May 31, 2014. We utilized ACL (Audit Data Extraction software) to assist in making selections. All selections were examined for adequate supporting documentation, reviewed for proper approval in accordance with applicable policy, and verified to be properly recorded.

Audit Limitations

Audit procedures alone, even when carried out with professional care, do not guarantee that fraud will be detected. With that premise, it is our opinion that the travel claim reimbursement activities successfully meet their financial, compliance, and operational objectives.

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud is the responsibility of management.

Findings and Recommendations

None.
PROPERTY RENTALS

Audit Approach

As an element of the College’s core business function, property rentals will be audited using the risk-based approach. The audit will only address property rentals.

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with the key personnel responsible for property rentals; for activities processed July 1, 2013, through May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing, and reporting of the property rental activities, plus supporting documentation required to support property rentals for the College’s departments; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding of significant processes and practices employed in administering the property rental function, specifically addressing the following components:

- Management philosophy, operating style, and risk assessment practices.
- Functional and organizational structure relating to delegation of authority and responsibility.
- Positions of accountability for financial and programmatic results.
- Leasing policies, standard practices and procedures.
- Student ledgers properly credited.
- Tenant review and approval process.
- Tenant payment process.
- Management review of edits and checks to enable identification of unusual or unexpected transactions.
- Applicable Federal/State rules and regulations.
PROPERTY RENTALS, CONTINUED

Summary of Policies and Procedures

Accountability for property rental control purposes is the delegation of authority to qualified persons to initiate, approve, process, and review expenditure transactions and the holding of those persons responsible for the validity, correctness, and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

Summary of Control Features of Internal Controls

Segregation of Duties: Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of property rental process.

Authorization and Approval: Property rental transactions are authorized by a person delegated approval authority consistent with policy.

Review and Reconciliation: Property rental records are routinely examined and reconciled to determine that transactions were properly processed.

Physical Security: Property rental records are secured and locked in filing cabinets and are only accessible to designated personnel.

Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level property rental policies and operating procedures are verbally communicated to employees.
INTERNAL AUDIT REPORT, CONTINUED

Fiscal Year 2013–2014

PROPERTY RENTALS, CONTINUED

Internal Audit Procedures Performed

Procedures Performed

We reviewed the policies and procedures used to administer property rental transactions to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the processes. We also conducted interviews with personnel involved in the process.

We received an inventory housing list of 33 rental units provided by the College. We reviewed all property rental documents and examined the details within each of the rental properties that support and approve the leasing transaction process. We sighted 28 rental properties and 4 vacant lots where houses were demolished, to verify existence. We will sight the Enid property at a later date.

Audit Limitations

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance, or irregularities do not exist. The deterrence of fraud is the responsibility of management.

Findings and Recommendations

None.
PAYROLL

Audit Approach

As an element of the College’s core payroll function, Payroll will be audited using the risk-based approach. The audit will only address payroll as defined by the generation of pay (Office of State Finance Payroll Warrant Register). The audit assumes that the employee was properly hired and that employment data was properly input into the system. No benefit issues will be addressed.

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with Payroll Office management and key personnel; payroll processed from July 1, 2013, to May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing, and reporting of payroll, plus supporting documentation required to support the payroll for all the College employees; a review of the employment handbook; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding of significant processes and practices employed in administering the payroll function, specifically addressing the following components:

- Management philosophy, operating style, and risk assessment practices.
- Organizational structure, and delegations of authority and responsibility.
- Positions of accountability for financial results.
- Additions, separations, wage rates, salaries, and deductions are properly authorized, recorded, and processed within Poise & People Soft in a timely manner.
- Employees’ time and attendance are properly reviewed, approved, processed, documented, and accurately coded for accounting and distribution.
- Payroll data is properly reconciled, recorded in a timely manner, and in the proper accounting period.
- Payroll journal entries and supporting documentation are reviewed and approved by the appropriate level of Management.
- Confidentiality of personnel data is maintained.
- Controls over the payroll process are evaluated.
ACCOUNTABILITY for payroll control purposes is the delegation of authority to qualified persons to initiate, approve, process, and review payroll transactions, and the holding of those persons responsible for the validity, correctness and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

The College is an “at-will” employer. The faculty is composed of five categories. These classifications include full-time faculty, part-time faculty, adjunct faculty, contractual faculty, and technical faculty. In addition, the College also employs students. These positions are paid either by salary or hourly. Positions are for the fiscal year July 1 through June 30 unless otherwise documented.

Depending upon the category of hire, each approved employee receives a signed and approved Employee Transaction Form or Temporary Employment Action Form in which the new hire brings to meet the Human Resource Director who will then prepare a Letter of Appointment. All employees are required to physically meet with the HR Director, without exception.

All employees must complete and sign an Employees Withholding Allowance Certification (W-4), an Employment Eligibility Verification (I-9), a Drug Free Schools Policy form, a Loyalty Oath Document, Direct Deposit Forms, and a Health Policy Examination document as/if required for special medical circumstances.

All employees are given an Employee Handbook. Section 5 of this manual denotes the College’s staff policies and general procedural information. The information contained in this section specifically addresses areas of compensation, hours of work, lunch period, work breaks, conduct, absenteeism, tardiness, overtime, extended leaves, employment policies, disciplinary action, etc.

**Summary of Control Features of Internal Controls**

**Segregation of Duties:** Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of any payroll transaction process.

**Authorization and Approval:** Payroll transactions are authorized by a person delegated approval authority consistent with policy. Employees do not approve actions affecting their own pay.

**Review and Reconciliation:** Payroll records are routinely examined and reconciled to determine that transactions were properly processed. The person performing the review signs and dates the payroll report to signify that the review has been satisfactorily completed and any discrepancies resolved.
PAYROLL, CONTINUED

Summary of Control Features of Internal Controls, Continued

Physical Security: Payroll records are secured physically in a secure room, locked in filing cabinets, and are only accessible to designated payroll custodians.

Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level payroll policies and operating procedures are formalized and communicated to employees. Management adheres to documenting payroll policies and procedures and making them accessible to employees. This helps provide day to day guidance to staff and has promoted continuity of payroll activities.

Internal Audit Procedures Performed

Procedures Performed

We reviewed the policies and procedures used to administer Payroll’s operations to ensure that they were effective and efficient. We documented procedures used, conducted a “walk through” of operations, and observed the payroll process. We conducted interviews with personnel involved in the Payroll operations, including Human Resources, Accounting, and other persons involved in the process.

We randomly selected 60 employees from the Master File Employee report dated July 1, 2013, through May 31, 2014. For each employee selected, we obtained documentation that properly supports employee hiring, contract, and wage qualifications.

Audit Limitations

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud is the responsibility of management.

Findings and Recommendations

None.
CASHIER

Audit Approach

As an element of Northern Oklahoma College’s (the “College”) core business function, cashier transactions will be audited using the risk-based approach. The audit will address the cashier process as it relates to daily functions, including activity advances and bookstore transactions.

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with Cashiers, Accounting, and Student Accounts management and key personnel; transactions processed from July 1, 2013, through May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing, and reporting of cashier’s daily work, plus supporting documentation required to support the transactions for the College’s departments; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding of significant processes and practices employed in administering the cashier function, specifically addressing the following components:

- Management philosophy, operating style, and risk assessment practices.
- Functional and organizational structure relating to delegation of authority and responsibility.
- Positions of accountability for financial and programmatic results.
- Data recording and reporting.
- Activity advance policies, standard practices and procedures.
- Bookstore policies, standard practices and procedures.
- Deposit policies, standard practices and procedures.
- College review and approval processes.
- Management review of edits and checks to enable identification of unusual or unexpected transactions.
- Conflicts of interest.
- Compliance with applicable Federal and State rules and regulations.
- Other processes, as needed.
- Controls over the cashier process are evaluated.
CASHIER, CONTINUED

Summary of Policies and Procedures

Accountability for cashier control purposes is the delegation of authority to qualified persons to initiate, approve, process, and review cashier transactions, and the holding of those persons responsible for the validity, correctness, and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

Summary of Control Features of Internal Controls

Segregation of Duties: Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of any cashier transaction process.

Authorization and Approval: Cashier transactions are authorized by a person delegated approval authority consistent with policy.

Review and Reconciliation: Cashier reports and records are routinely examined and reconciled to determine that transactions were properly processed. The person performing the review signs and dates the cashier reports to signify that the review has been satisfactorily completed and any discrepancies resolved.

Physical Security: Cashier records are secured and locked in filing cabinets and are only accessible to designated personnel.

Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level cashier policies and operating procedures are formalized and communicated to employees. Management adheres to documenting cashier policies and procedures and making them accessible to employees. This helps provide day to day guidance to staff and has promoted continuity of cashier activities.
CASHIER, CONTINUED

Internal Audit Procedures Performed

Procedures Performed

We reviewed the College’s policies and procedures for the cashier processes, daily balancing, including voided transactions, and postdating of transaction’s to ensure that they were effective and efficient. We reviewed the cashiers’ daily functions to determine that proper segregation of duties, proper reconciliation of reports, and proper review was occurring. We documented procedures used, conducted a “walk through” of cashier operations, and observed the process. We conducted interviews with personnel involved in the process.

A selection was made from bookstore deposits and activity advances for cashier testwork (see Bookstore and Activity Advances sections). All selections were agreed to proper supporting documentation and reports, reviewed to determine whether proper cashier procedures were adhered to, traced to applicable bank statement, and verified to properly reconciled and properly recorded.

A selection of transactions from the Discrepancy Reports was made for testwork. All selections were examined for adequate supporting documentation, reviewed for proper approval, and verified to be properly recorded. In addition, all discrepancy reports (showing voided and postdated transactions made by the cashiers) from January 28, 2014, through May 31, 2014, were reviewed to verify the reports were properly reviewed, worked, and considered to be proper by a supervisor.

Audit Limitations

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud is the responsibility of management.
CASHIER, CONTINUED

Findings and Recommendations

Findings

We noted the same employee who can receive cash also posts payments to student and other accounts within the Poise system, reconciles daily cash receipts, prepares the deposit, and takes the deposit to the bank.

We noted each cashier has the ability to void transactions without first obtaining supervisor approval.

Recommendations

We recommend the functions of posting cash transactions to the system, reconciling cash, preparing the deposit, and taking the deposit to the bank be performed by separate individuals.

We recommend proper supervisor approval be obtained before transactions are voided in the system by cashiers.

Management’s Response

A new POISE report was recently created that enables an accountant to verify and audit the daily work of each cashier. The report shows the composition (cash, check, or credit card) for each cashier. Another report that is reviewed by the accountant shows any voiding activity for all cashiers. Each of these reports is printed daily, audited, and signed by the accountant.

The head cashier in Tonkawa summarizes daily activity for all campuses. The Enid and Stillwater campuses have one cashier responsible for the cash drawer on each respective campus. It is not practical at this time to add an additional cashier for the sole purpose of splitting the duties of posting payments, preparing and taking daily deposits, when the work load on a daily basis does not warrant hiring additional personnel.

It is customary for cashiers to consult with the Coordinator for Student Accounts prior to voiding a transaction. Cashiers also need capability to void a transaction on days when the Coordinator is not in the office, so that daily balancing can be accomplished. The accountant reviews the report showing voiding activity for the day, and discusses any questionable voids with the cashier who processed the void. The accountant notes the reason for any unusual voiding activity on the report and signs off once satisfied that each void is appropriate.
ACTIVITY ADVANCES

Audit Approach

As an element of Northern Oklahoma College’s (the “College”) core business function, activity advances will be audited using the risk-based approach. The audit will only address activity advances.

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with Cashiers, Accounting, and Student Accounts management and key personnel; activity advances processed from July 1, 2013, through May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing, and reporting of activity advances, plus supporting documentation required to support the advance for the College’s departments; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding of significant processes and practices employed in administering the activity advances, specifically addressing the following components:

- Management philosophy, operating style, and risk assessment practices.
- Functional and organizational structure relating to delegation of authority and responsibility.
- Positions of accountability for financial and programmatic results.
- Purchasing policies, standard practices and procedures.
- Data recording and reporting.
- Advances properly recorded.
- Deposits properly recorded.
- Vendor invoicing and College review and approval processes.
- College payment processes.
- Management review of edits and checks to enable identification of unusual or unexpected transactions.
- Conflicts of interest.
- Other processes, as needed.
- Controls over the activity advance process are evaluated.
ACTIVITY ADVANCES, CONTINUED

Summary of Policies and Procedures

Accountability for activity advance control purposes is the delegation of authority to qualified persons to initiate, approve, process, and review activity advance transactions, and the holding of those persons responsible for the validity, correctness, and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

Summary of Control Features of Internal Controls

Segregation of Duties: Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of any activity advance transaction process.

Authorization and Approval: Activity advance transactions are authorized by a person delegated approval authority consistent with policy.

Review and Reconciliation: Activity advance records are routinely examined and reconciled to determine that transactions were properly processed. The person performing the review signs and dates the activity advance report to signify that the review has been satisfactorily completed and any discrepancies resolved.

Physical Security: Activity advance records are secured and locked in filing cabinets and are only accessible to designated personnel.

Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level activity advance policies and operating procedures are formalized and communicated to employees. Management adheres to documenting activity advance policies and procedures and making them accessible to employees. This helps provide day to day guidance to staff and has promoted continuity of activity advance activities.
ACTIVITY ADVANCES, CONTINUED

Internal Audit Procedures Performed

Procedures Performed

We reviewed the College’s policies and procedures for activity advances (including the cashier process), to ensure that they were effective and efficient. We reviewed the daily process related to activity advances for sponsors, cashiers, and accounting personnel to determine that proper segregation of duties, proper reconciliation of reports, and proper review was occurring. We documented procedures used, performed a “walk through” of operations, and conducted interviews with personnel involved in the process.

A selection of 50 activity advances from the Activity Advance Detail Report from July 1, 2013, through May 31, 2014, was made for testwork. All selections were examined for adequate supporting documentation, reviewed to verify proper cashier procedures were followed, reviewed for proper receipt and approval in accordance with applicable policy, traced to applicable bank statement, and verified to be properly reconciled and properly recorded.

Audit Limitations

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud is the responsibility of management.
ACTIVITY ADVANCES, CONTINUED

Findings and Recommendations

Findings

We noted no supporting documentation was provided for two separate cash activity advances, totaling $2,875.

Also, exceptions noted specifically for cashier process; see Results in Cashier section.

Recommendations

We recommend proper supporting documentation be obtained and retained to substantiate activity advances.

Management’s Response

The two activity advances noted above were identified by NOC at the time a special audit was underway by Crawford & Associates, P.C. NOC identified the activity advances and discussed details of the activity and the expenditure of funds with the faculty/coaches involved with each advance. Each item was reviewed by NOC management and Crawford personnel. In each instance it was determined that documents had been destroyed by NOC’s cashier on administrative leave at that time. The former employee admitted to law enforcement that she had destroyed records and that she had taken missing monies. These items were also identified by Finley & Cook, PLLC, through the course of their examination, and are listed above accordingly since they occurred during the internal audit period being examined.
BOOKSTORE

Audit Approach

As an element of Northern Oklahoma College’s (the “College”) core business function, bookstore transactions will be audited using the risk-based approach. The audit will only address bookstore transactions.

Following completion of the general overview and risk assessment, we used professional judgment to select specific areas for additional focus and audit testing as needed.

Audit Scope

The general scope of the audit include interviews with Bookstore personnel, Accounting, Purchasing, and Student Accounts management and key personnel; bookstore transactions processed from July 1, 2013, through May 31, 2014; all other related documents and information pertaining to the collection, reviewing, processing and reporting of bookstore transactions plus supporting documentation required to support the transactions for the College’s departments; a review of available financial and management reports; review of key referencing/training material; evaluation of implementation of College-wide policies; and consideration of key operational aspects.

We obtained a detailed understanding of the management structure, significant operational processes, compliance requirements, and information systems.

Audit Objectives

Our objective was to obtain an understanding of significant processes and practices employed in administering the bookstore function, specifically addressing the following components:

- Management philosophy, operating style, and risk assessment practices.
- Functional and organizational structure relating to delegation of authority and responsibility.
- Positions of accountability for financial and programmatic results.
- Purchasing policies, standard practices and procedures.
- Inventory policies, standard practices and procedures.
- Expenditures are properly coded.
- Sales are properly coded.
- Vendor invoicing and College review and approval processes.
- College payment processes.
- Deposit policies, standard practices and procedures.
- Management review of edits and checks to enable identification of unusual or unexpected transactions.
- Conflicts of interest.
- Other processes, as needed.
- Controls over the bookstore process are evaluated.
BOOKSTORE, CONTINUED

Audit Objectives, Continued

- Evaluate the local compliance with the following requirements:
  - Financial/Accounting Policies and Procedures Manual,
  - College’s expenditure policies,
  - Authorization limits, and
  - Applicable Federal/State rules and regulations.

Summary of Policies and Procedures

Accountability for bookstore control purposes is the delegation of authority to qualified persons to initiate, approve, process and review bookstore transactions and the holding of those persons responsible for the validity, correctness and appropriateness of their actions.

Managers and leaders at all levels of the College’s organization are responsible for ensuring that an appropriate and effective control environment is in place in their areas of responsibility. All College personnel are responsible for communicating upward observed or suspected problems involving fraud or other improprieties involving College resources.

Summary of Control Features of Internal Controls

Segregation of Duties: Duties are divided, or segregated, among different employees to reduce risk of error or inappropriate actions. No one person has control over all aspects of any bookstore transaction process.

Authorization and Approval: Bookstore transactions are authorized by a person delegated approval authority consistent with policy.

Review and Reconciliation: Bookstore records are routinely examined and reconciled to determine that transactions were properly processed. The person performing the review signs and dates the bookstore reports to signify that the review has been satisfactorily completed and any discrepancies resolved.

Physical Security: Bookstore records are secured and locked in filing cabinets and are only accessible to designated personnel.
Training and Supervision: Employees receive appropriate training and guidance to ensure they have knowledge necessary to carry out their job duties, are provided with an appropriate level of direction and supervision, and are aware of the proper channels for reporting suspected improprieties.

Documentation of Policies and Procedures: College and departmental level bookstore policies and operating procedures are formalized and communicated to employees. Management adheres to documenting bookstore policies and procedures and making them accessible to employees. This helps provide day to day guidance to staff and has promoted continuity of bookstore activities.

Internal Audit Procedures Performed

Procedures Performed

We reviewed the College’s policies and procedures for bookstores deposits (including the cashier process), for bookstore expenditures, inventory, and sales to ensure that they were effective and efficient. We reviewed the daily bookstore functions to determine that proper segregation of duties, proper reconciliation of reports and proper review was occurring. We documented procedures used, conducted a “walk through” of bookstore operations, and observed the process. We conducted interviews with personnel involved in the process.

A selection of 32 deposits for the Tonkawa bookstore and 32 deposits for the Enid bookstore was made from the Daily Transaction Reports for testwork. All selections were agreed to proper supporting bookstore and cashier reports, reviewed to verify proper cashier procedures were adhered to, traced to applicable bank statement and verified to be properly reconciled and properly recorded.

We selected 30 expenditures for the Tonkawa bookstore and 30 expenditures for the Enid bookstore from the E&G (290) Fund from July 1, 2013, through May 31, 2014. We utilized ACL (Audit Data Extraction software) to assist in making selections. All selections were examined for adequate supporting documentation, reviewed for proper receipt and approval in accordance with applicable policy and verified to be properly recorded.

Analytical procedures were applied to bookstore sales and inventory expenditures in relation to the number of students enrolled for a three year period. Any changes were reviewed and were determined to be reasonable.
BOOKSTORE, CONTINUED

Internal Audit Procedures Performed, Continued

Audit Limitations

The purpose of the internal audit report is to furnish management independent, objective analyses, recommendations, and information concerning the activities reviewed. The internal audit report is a tool to help management discern and implement specific improvements. The internal audit report is not an appraisal or rating of management.

We detected no significant irregularities, abuse, or illegal acts. Although we exercised due professional care in the performance of this audit, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud is the responsibility of management.

Findings and Recommendations

Exceptions noted specifically for cashier process; see Results in Cashier section.
DATA EXTRACTION

Expenditures

Computer auditing techniques were applied to the complete check register from July 1, 2013, to May 31, 2014, in order to perform extensive testing. Procedures performed included:

Benford Analysis was performed for the E&G (290) Fund and the Auxiliary (700) Fund. The Benford analysis is performed to detect anomalies or abnormal recurrences of digits. Any abnormalities could pinpoint areas for investigation to determine if there are symptoms of error, waste, processing inefficiencies, or fraud.

- The Benford analysis performed on the E&G (290) Fund indicated transactions with a leading five slightly exceeded the expected range. The transactions were reviewed and determined to be appropriate.

- The Benford analysis performed on the Auxiliary (700) Fund indicated transactions with a leading five exceeded the expected range. The transactions were reviewed and it was determined they were Oklahoma Tuition Aid Grant (OTAG) disbursements that were typically issued in increments of five. These transactions were reviewed and determined to be appropriate.

Procedures were performed to identify any possible duplicate payments.

- The results for duplicate payments produced 66 possible instances of duplicates. All instances were reviewed and determined to be appropriate.

Procedures were performed to identify any possible missing checks.

- The results for possible missing checks produced 70 possible instances of missing checks. All instances were reviewed and determined to be appropriate.

Payroll

Computer auditing techniques were applied to the complete payroll from July 1, 2013, to May 31, 2014, in order to perform extensive testing. Procedures performed included:

Procedures were performed to identify any duplicate addresses of employees.

- The results produced 188 instances of duplicate addresses. All instances were reviewed and determined to be appropriate.

Procedures were performed to identify any duplicate social security numbers of employees.

- The results produced no duplicate social security numbers.