

TO ALL FACULTY AND STAFF:

The New York State Governmental Accountability, Audit and Internal Control Act of 1987 requires all State-operated campuses of the State University of New York to establish and maintain a system of internal controls and an ongoing internal control program.

The College at Brockport has adopted the State University of New York's Internal Control Guidelines. This brochure is an abbreviated version of those guidelines and references specific aspects of the College's Internal Control Program.

The College at Brockport's Internal Control Program is essentially a program of review. The program helps to ensure that daily operating practices and procedures are sufficient to minimize the possibility of operational failure, overspending or other actions inconsistent with policy or in violation of the law. Simply stated, the College's Internal Control Program is designed to review, critique and strengthen our existing systems and procedures.

As stewards of public funds and the education of our citizens, it is the responsibility of all College employees to ensure that we are as efficient and effective as possible within the confines of existing laws, policies and procedures. In that way, not only will we meet our internal control responsibilities, but we will be promoting our primary goal of student success.

Sincerely,

John R. Halstead, PhD
President

Louis M. Spiro
Vice President for Administration and Finance
Internal Control Officer

INTERNAL CONTROL REQUIREMENTS

The Internal Control Act requires that all state agencies, including SUNY, institute a formal internal control program. Each agency shall:

1. Establish and maintain guidelines for a system of internal controls.
2. Establish and maintain an internal control system and internal control review process.
3. Make a clear and concise statement of managerial policies and standards available to all employees.
4. Designate an internal control officer.
5. Provide internal control education and training.

PROGRAM OPERATION

The College at Brockport's Internal Control Program incorporates the following:

Segmentation

Segmentation is the process of identifying the program and administrative functions necessary for the College to carry out its mission. Functions identified through this process are called "assessable units" and provide the framework for the implementation of the College's Internal Control Program.

Risk Assessment Surveys

Through the use of risk assessment surveys, the College monitors and evaluates its susceptibility to conscious or unintended abuses and reduced operational efficiencies.

Completed surveys are evaluated and a rating of low, average or high risk is assigned to each assessable unit. These ratings are considered when scheduling internal control reviews.

Internal Control Reviews

An internal control review analyzes procedures and policies to ensure they are functioning as intended and that they assist the unit in meeting its objectives and goals. Examples of procedures and policies which may be reviewed include planning activities, program evaluations, the budget cycle, personnel transactions, information systems, cash activities, contract management and capital programs.

Follow-up

Verification that recommended actions have been properly implemented and the area continues to function as intended.

Advisory Committee

The Internal Control Advisory Committee is comprised of individuals from the following areas: Administration and Finance, BASC, Facilities and Planning, Financial Aid, Human Re-

sources (Payroll), Library and Information Technology Services, Procurement and Payment Services (Property Control), and vice president representation from Academic Affairs, Advancement and Enrollment Management and Student Affairs. Together, this group is responsible for implementing internal controls and educating members of the College community.

Training

New York state law requires that the College inform all employees of what comprises internal controls, as well as what their individual responsibilities are for ensuring that internal controls are effective and adhered to.

The College developed three training approaches including online, printed materials, and presentations. Management level staff must complete online training, and ensure their departmental employees complete an abbreviated version.

Online employee training materials can be viewed at <https://angel.brockport.edu/section/default.asp?id=GROUP-090107-110056-LAC>.

INTERNAL CONTROL SYSTEMS

The Internal Control Program is comprised of several major internal control systems. These systems support and strengthen the College's planning processes and provide reasonable assurance that the objectives of our Internal Control Program are met. Some examples of the major internal control systems now include:

- Administrative procedure manuals
- Budget development and approval process (www.suny.edu/FinanceandBusiness/index.cfm)
- Cash management (www.brockport.edu/intcontrol/cashmgmt.pdf)
- Chart of accounts (www.brockport.edu/budget)
- Computer Operations/Information Technology (<http://www.brockport.edu/its/itsn/>)
- Environmental Health and Safety (<http://www.brockport.edu/ehs/>)
- Financial Aid (www.brockport.edu/finaid)
- Human Resource policy handbooks and memoranda (www.brockport.edu/hr/procedures)
- Institutional data coordination (Research Analysis and Planning) (www.brockport.edu/ir)
- Internal control review activity (www.brockport.edu/intcontrol)

- Mission statements and operational objectives
- NYS Education Law and other applicable laws, policies and regulations (<http://usny.nysed.gov/policy.html>)
- Organization charts and decision-making hierarchies for faculty and staff (to view division/department mission statements and organization charts access www.brockport.edu/home/faculty)
- Pandemic Planning/Disaster Recovery
- Procurement (www.brockport.edu/pps)
- Property Control/Equipment Inventory System (www.brockport.edu/pps/propertycontrol/)

The College's Internal Control Program provides for a formal evaluation of the effectiveness of our major systems and their individual control mechanisms. Where gaps or non-effective controls exist, they are identified and addressed on a reasonable timetable.

EMPLOYEE'S RESPONSIBILITY

INTERNAL CONTROLS ARE THE RESPONSIBILITY OF ALL EMPLOYEES.

Departmental managers are responsible for the development, maintenance, documentation and enforcement of internal control systems; each supervisor is responsible for disseminating applicable internal control information and expectations to their direct reports. **Each College at Brockport employee is responsible for adhering to established internal controls and all applicable management policies and standards issued by the State of New York, SUNY System or The College at Brockport.**

The following are examples of College management policies and standards with which, when applicable, all employees are expected to comply:

- Affirmative Action policies and procedures (formal statements and polices governing hiring procedures) (www.brockport.edu/aao)
- Board of Trustees—Policies issued by (www.suny.edu/Board_of_Trustees/index.cfm)
- Collective bargaining agreements for Brockport (www.brockport.edu/home/faculty.htm) or the Governor's Office of Employee Relations (www.goer.state.ny.us/CNA)
- Duties and performance standards as established in job description and performance programs, www.brockport.edu/hr/resources for classified staff; professional staff information at www.brockport.edu/hr/resources/classification.html

- Faculty and Staff handbook (www.brockport.edu/hr/resources/handbook)
- Federal Trade Commission (FTC) safeguarding customer and financial records (www.ftc.gov/privacy/)
- Parking regulations (www.basc1.com/parking)
- The Public Officers Law and Ethics Law (both available at <http://dos.state.ny.us>)
- Records Retention (<http://www.brockport.edu/accounting/recordsretention.html>)
- Smoking, managing AIDS, and alcohol and drug use in the workplace (www.brockport.edu/hr/resources/handbook)
- Textbook and course packet order (www.brockport.edu/hr/resources/chapters/760basbookstoreindexing.htm)
- Travel polices (www.brockport.edu/pps/travel)

Many of the above items can be viewed in the Drake Library, the Budget Office, or via the Web using the appropriate link(s) provided above. Information documents or memoranda issued and distributed by the president, vice presidents, deans, directors and department chairs should be available in your department office; all employees are responsible for knowing and adhering to the information provided in these documents.

MORE INFORMATION

For more information regarding The College at Brockport's Internal Control Program, please contact:

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To report fraud or theft, e-mail icontrol@brockport.edu or access the Fraud Hotline on the SUNY Web site at <http://www.suny.edu/universityauditor/reportfraud.cfm>. You will remain anonymous.



The College at
BROCKPORT
STATE UNIVERSITY OF NEW YORK

INTERNAL CONTROL PROGRAM

2009–2010

**Internal controls are the
responsibility of all employees**

DEVELOPED IN ACCORDANCE WITH
SUNY INTERNAL CONTROL GUIDELINES