

DFA Conversations – Internal Controls

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Agenda

- Introduction
- Policy 3.26 Financial Internal Controls
- Internal Control Committee
- FIN 203 Internal Controls
- Unit-specific internal control plan example
- Annual Operating Unit Internal Control Certification

Policy 3.26 – Financial Internal Controls

Approved by EPRG on 11/5/19

Requires all operating units to develop unit-specific financial internal control plans

DFA to provide templates and training

Internal Control Committee

- Cross-functional group with representatives from 14 different areas of the university
- Monitors reports and recommends updates to the university's internal control framework

 Supports operating units with implementation through reviewing and approving the tools and templates developed by DFA

FIN 203 – Internal Controls

New course in fall 2019

- Part of the redesigned DFA Accounting Certification Program
- Provides an overview of the COSO internal control framework

 Discusses Cornell's internal control framework and the role employees play

Unit Specific Control Plans

- The University Business Service Center (UBSC) completed its internal control plan on 9/30/19:
 - Process maps and control narratives
 - Risk assessment tool
 - Executive summary and management's response plan
- The Division of Financial Affairs (DFA)'s consolidated control plan will be completed by 3/31/20.
- DFA's control plan will serve as a foundation for other operating units to prepare their control plans, beginning in 2020.

Process Narratives

- Document the key elements of a process
 - Roles and responsibilities
 - Sources of information
 - Criticality
 - Frequency
 - System access

Process Narratives

Includes detailed procedures

Identify key risks and controls

Identify inefficiencies

Example Narrative – UBSC Cash Disbursements

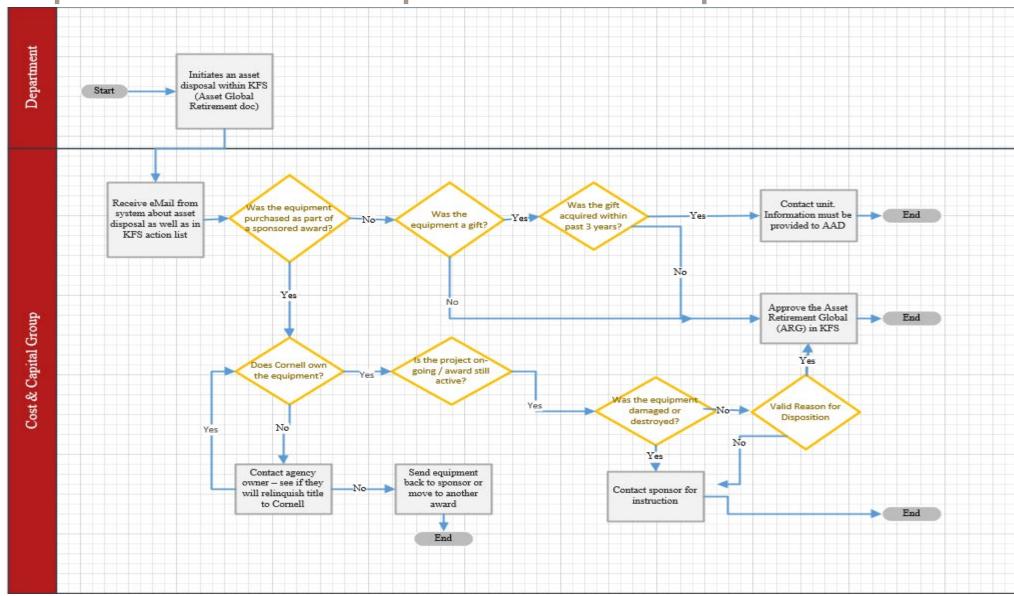
Process Maps

Provides a visual of a process from start to finish

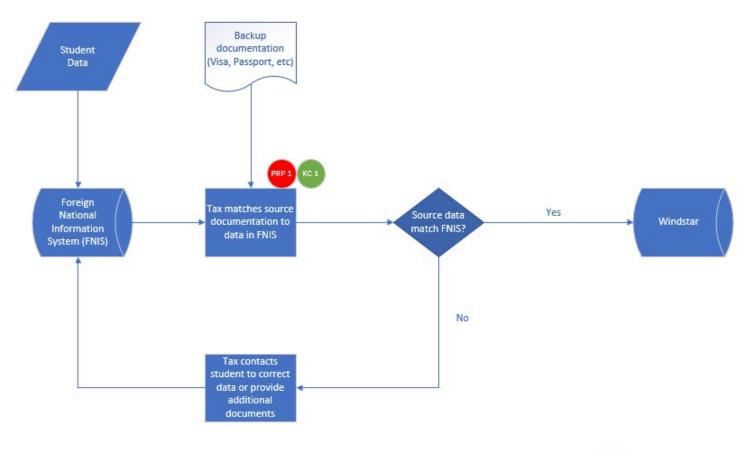
Identifies systems and responsibilities

Visualize risk points and controls

Example Process Map – Asset Disposal

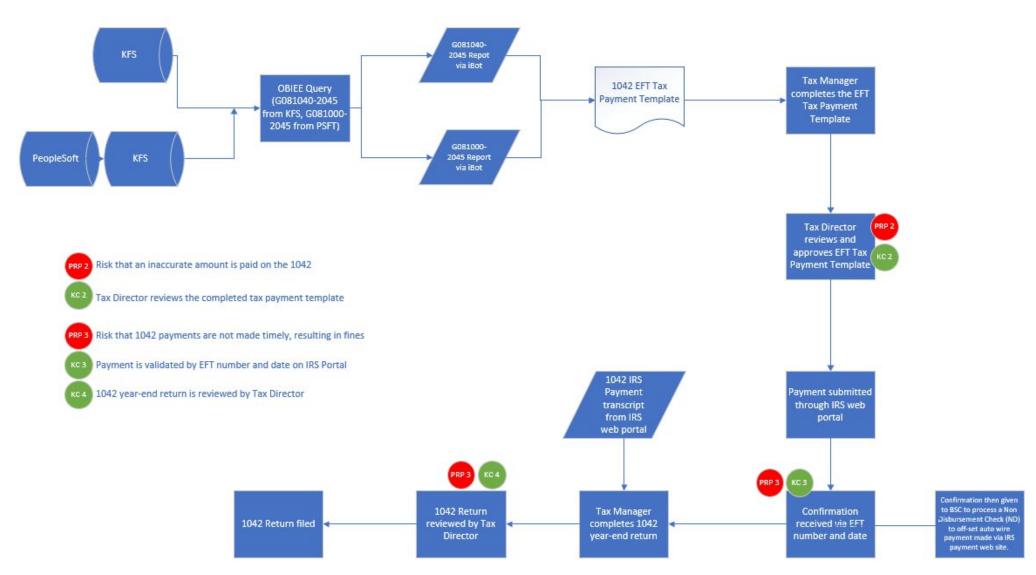


Example Process Map – DFA Foreign National Onboarding



- Risk that students enter inaccurate/incomplete onboarding data, resulting in the University paying an incorrect amount of FICA/withholding
- Tax Manager matches source documents to information provided in FNIS

Example Process Map – DFA 1042 Payment Processing



Risk Assessment

Assess "what can go wrong" in a process

Evaluate inherent risk of each identified risk

 Evaluate existing controls which address identified risks, and note where gaps exist

Risk Assessment

Allows the unit to focus resources on high risk areas

 Unit can identify inefficiencies where resources are allocated to low risk areas

Example Risk Assessment - UBSC

Executive Summary and Management Response

 Summary focuses on the higher risk areas identified during risk assessment

 Management states corrective actions to take related to identified weakness or inefficiencies

Example – UBSC Summary and Response Plan

Operating Unit Internal Control Certification

- Required annually from each unit to support the university's financial statement audit
- Includes attestations over the following areas:
 - Completeness and accuracy over financial reporting
 - Effective internal controls
 - Changes in activities
 - Commitments/Contingencies/Disclosures

Example – FY19 OUICC Template