

Audit Report

**University System of Maryland
Frostburg State University**

August 2020



OFFICE OF LEGISLATIVE AUDITS
DEPARTMENT OF LEGISLATIVE SERVICES
MARYLAND GENERAL ASSEMBLY

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DEPARTMENT OF LEGISLATIVE SERVICES
OFFICE OF LEGISLATIVE AUDITS
MARYLAND GENERAL ASSEMBLY

Victoria L. Gruber
Executive Director

Gregory A. Hook, CPA
Legislative Auditor

August 5, 2020

Senator Clarence K. Lam, M.D., Senate Chair, Joint Audit and Evaluation Committee
Delegate Carol L. Krimm, House Chair, Joint Audit and Evaluation Committee
Members of Joint Audit and Evaluation Committee
Annapolis, Maryland

Ladies and Gentlemen:

We have conducted a fiscal compliance audit of the University System of Maryland (USM) – Frostburg State University (FSU) for the period beginning July 1, 2015 and ending August 25, 2019. FSU is a comprehensive public institution of USM offering an array of undergraduate and graduate degrees.

Our audit disclosed that due to a lack of documentation, we could not ensure FSU's compliance with USM Board of Regents procurement policies and procedures regarding the use of contracts established by other organizations, institutions, or agencies. In addition, FSU did not have a formal agreement governing construction management services being provided by another State university as required, and did not receive sufficient documentation to monitor these services. Our audit also disclosed that FSU did not ensure that user access capabilities on its financial management systems were adequately restricted. FSU also did not have adequate procedures for logging and monitoring critical database security and audit events and for independently verifying that all bookstore collections were deposited and related refunds were proper.

Our audit also included a review to determine the status of the four findings contained in our preceding audit report. We determined that FSU satisfactorily addressed three of these findings. The remaining finding is repeated in this report.

The USM Office's response to this audit, on behalf of FSU, is included as an appendix to this report. In accordance with State law, we have reviewed the response and noted that while FSU generally agrees with the recommendations in

this report, it disagrees with the recommendation for Finding 1. In this instance, we reviewed and reassessed our audit documentation, and reaffirmed the validity of the finding. In accordance with generally accepted government auditing standards, we have included an “auditor comment” within FSU’s response to explain our position. We will advise the Joint Audit and Evaluation Committee of any outstanding issues that we cannot resolve with FSU.

We wish to acknowledge the cooperation extended to us during the audit by FSU. We also wish to acknowledge USM’s and FSU’s willingness to address the audit issues and implement appropriate corrective actions.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory A. Hook". The signature is written in a cursive style with a large initial 'G' and 'H'.

Gregory A. Hook, CPA
Legislative Auditor

Table of Contents

Background Information	4
Agency Responsibilities	4
Status of Findings From Preceding Audit Report	4
Findings and Recommendations	5
Contracts and Disbursements	
Finding 1 – Frostburg State University (FSU) lacked documentation of its compliance with University System of Maryland Board of Regents procurement policies and procedures regarding the use of contracts established by other organizations, institutions, or agencies. In addition, FSU did not verify that the prices charged were in accordance with the related contracts.	5
Finding 2 – FSU did not have a formal agreement governing construction management services being provided by another State university and did not receive sufficient documentation to monitor these services and ensure the propriety of amounts invoiced by the university.	6
Information Systems Security and Control	
* Finding 3 – FSU did not ensure that user access capabilities on financial management systems were adequately restricted resulting in employees with unnecessary or inappropriate system capabilities.	8
Finding 4 – FSU’s procedures for logging and monitoring critical database security and audit events were not adequate.	9
Bookstore	
Finding 5 – FSU did not independently verify that all bookstore collections were deposited and related refunds were proper.	10
Audit Scope, Objectives, and Methodology	11
Agency Response	Appendix

* Denotes item repeated in full or part from preceding audit report

Background Information

Agency Responsibilities

Frostburg State University (FSU) is a comprehensive public institution of the University System of Maryland (USM) and operates under the jurisdiction of the System's Board of Regents. FSU offers an array of undergraduate and graduate degrees with an emphasis on arts, humanities, business, applied technologies, education, environmental sciences, human services, and social and behavioral sciences. According to USM records, student enrollment for the fall 2019 semester totaled 5,178 students, including 4,429 undergraduate students and 749 graduate students.

FSU's budget is funded by unrestricted revenues, such as tuition and fees and a State general fund appropriation, as well as restricted revenues, such as federal grants and contracts. According to the State's accounting records, FSU's revenues for fiscal year 2019 totaled approximately \$115.6 million, including a State general fund appropriation of approximately \$40.5 million.

Status of Findings from Preceding Audit Report

Our audit included a review to determine the status of the four findings contained in our preceding audit report dated April 19, 2016. As disclosed in the following table, we determined that FSU satisfactorily addressed three of these findings. The remaining finding is repeated in this report.

Status of Preceding Findings

Preceding Finding	Finding Description	Implementation Status
Finding 1	FSU did not ensure that capabilities assigned to individuals on the financial management systems were adequately restricted.	Repeated (Current Finding 3)
Finding 2	Procedures for maintaining and securing numerous FSU workstations were not sufficient.	Not repeated
Finding 3	Sensitive personally identifiable information was not appropriately safeguarded.	Not repeated
Finding 4	Access and monitoring controls over two databases and applications were not sufficient to protect critical data.	Not repeated

Findings and Recommendations

Contracts and Disbursements

Finding 1

Frostburg State University (FSU) lacked documentation of its compliance with University System of Maryland (USM) Board of Regents procurement policies and procedures regarding the use of contracts established by other organizations, institutions, or agencies. In addition, FSU did not verify that the prices charged were in accordance with the related established contracts.

Analysis

FSU did not document that its use of certain contracts procured by other entities was in the best interest of FSU or that the contracts had been properly procured by those entities, as required by USM Board of Regents policy. In addition, FSU did not verify that the prices charged by vendors were in accordance with the related contracts.

We reviewed six FSU contracts totaling approximately \$2.1 million that were originally procured by other organizations, institutions, or agencies for goods and services such as computers and construction services.

- For four contracts reviewed totaling approximately \$907,000, FSU did not document that its use of the contract was in the best interest of FSU and that the contract had been originally awarded using a proper procurement process, as required by USM Board of Regents procurement policies and procedures. The other two contracts reviewed were exempt from those provisions of the procurement policies and procedures because they were intercollegiate athletic contracts.
- For all six contracts, FSU did not verify that amounts billed by the vendor were in accordance with the related contract to ensure payments were proper. Specifically, FSU did not have the original contract for five of six contracts tested. For the one contract that was obtained by FSU, which totaled \$278,500 over a five-year period, FSU had no procedure to verify the related invoices and lacked sufficient documentation to allow for a verification.

Subsequent to our inquiries, FSU obtained additional contract documentation for the remaining five contracts. Based on our review, we determined that FSU was properly invoiced for four of the five contracts totaling \$1,370,190.

Documentation obtained for the fifth contract was insufficient to verify that the invoices received by FSU were proper.

USM Board of Regents procurement policies and procedures state that USM institutions may use contracts established by other organizations, institutions, or agencies provided that use of the contract is in the best interest of the institution, and the established contract was awarded after a proper procurement process. The Board of Regents policies and procedures do not specifically state that an institution must document the steps it took to comply with these requirements and FSU contends that such documentation is unnecessary. However, without adequate documentation, FSU lacked a written record of specific action taken to ensure compliance for each contract executed. Similar documentation is required of other State agencies for certain procurements (such as intergovernmental purchasing agreements) by State Procurement Regulations. Consequently, implementing a process to document compliance with Board policies is appropriate and reasonable.

Recommendation 1

We recommend that FSU

- a. document, for each applicable contract, the steps it took to comply with USM Board of Regents policies and procedures requiring that its use of contracts established by other organizations, agencies, or institutions is in the best interest of FSU, and that the contracts were properly procured; and**
- b. verify that amounts invoiced by vendors are consistent with the established contract rates.**

Finding 2

FSU did not have a formal agreement governing construction management services being provided by another State university and did not receive sufficient documentation to monitor these services and ensure the propriety of amounts invoiced by the university.

Analysis

FSU did not have a formal agreement governing construction management services being provided by another State university and did not receive sufficient documentation to ensure the propriety of amounts invoiced for those services. FSU used the services of one of two State universities (service centers) designated by USM to provide construction management services to USM institutions. According to FSU's records, payments to the State university that served as its service center totaled approximately \$574,000 during our audit period.

FSU did not develop a Memorandum of Understanding (MOU) with the State university as required by USM's *Construction Service Centers Guide*. The *Guide* calls for USM institutions and their respective service centers to develop a five-year MOU outlining anticipated projects to be managed by the service center and the deliverables due from each party. The *Guide* stipulates that the service centers are to develop cost estimates and schedules for each project, conduct vendor selection, manage the work of the vendor, ensure adherence to project schedules, and authorize vendor payments.

Furthermore, FSU's service center is required by the *Guide* to prepare a project management expense recovery estimate (PMER) for every project managed by the center. The PMER provides an estimate of project management hours and costs that will be incurred by the center and billed to FSU. However, FSU did not receive a copy of the PMER. Without the required MOU and PMER, FSU was not in a position to adequately monitor the work of the service center and ensure that service center invoices it received were in accordance with projected costs. Subsequent to our inquiry, FSU advised that they planned to enter into an MOU with the service center.

Recommendation 2

We recommend that FSU

- a. enter into an MOU with the service center for construction management services as called for by the USM *Construction Service Centers Guide*, and**
- b. obtain from the service center a PMER as specified in the *Guide* to help monitor invoices received for all construction projects for which the service center provides management services.**

Information Systems Security and Control

Background

FSU's Office of Information Technology provides technical information systems support to FSU through the operation and maintenance of campus-wide administrative applications, such as the human resources, student administration, and financial systems. The Office of Information Technology also operates an integrated administrative and academic computer network, which provides connections to multiple servers used for administrative applications and related databases. The campus network connects to the internet, the Maryland Research and Education Network, and certain other USM institutions. Also, the campus network includes a firewall, other network traffic filtering software and devices, and an extensive wireless network.

Finding 3

FSU did not ensure that user access capabilities on its financial management systems were adequately restricted resulting in employees with unnecessary or inappropriate system capabilities.

Analysis

FSU did not ensure that user access capabilities on its financial management systems were adequately restricted to prevent improper transactions. Although reports of user access granted to each FSU employee were provided to management personnel for their review, these reviews did not identify all unnecessary or inappropriate system access. Furthermore, these reviews were performed only on an annual basis. We reviewed system capabilities assigned to 313 users for nine critical functions related to each of the following areas: student financial aid, student accounts, payroll, and procurements and disbursements.

- Fifteen system users were assigned access to critical student financial aid capabilities even though they did not need the access for their assigned jobs. In addition, 7 users (including 2 of the aforementioned 15) had access to process critical transactions without independent approval. Specifically, all 7 could modify student financial data used to determine student eligibility for federal aid and 5 of the 7 could also create and modify student financial aid budgets that establish a maximum amount of aid a student can receive.
- One user had excessive access to student accounts including the ability to adjust student accounts without any independent approval and process related cash receipts. Subsequent to our inquiries, the access to adjust student accounts was removed because the user did not need it for their assigned job.

Similar conditions regarding unnecessary or inappropriate system access were commented upon in our preceding audit report. USM's *IT Security Standards* specify that institutions must segregate critical functions to ensure the appropriate separation of duties for system users. In addition, institutions are responsible for ensuring that access rights reflect employee status, including changes in employee status.

Recommendation 3

We recommend that FSU ensure that user access capabilities in its financial management systems are adequately restricted to prevent improper transactions. Specifically, we recommend that FSU

- a. use its annual review of user access capabilities to ensure that system access to perform critical functions is restricted to those employees who require such access for their job duties, and in a manner that ensures a**

- proper segregation of duties and independent review and approval of critical transactions (repeat);
- b. consider conducting reviews of user access capabilities on a more frequent basis than annually; and
 - c. address the unnecessary and inappropriate access identified in our finding.

Finding 4

FSU's procedures for logging and monitoring critical database security and audit events were not adequate.

Analysis

FSU's procedures for logging and monitoring critical database security and audit events related to the student administration system were not adequate. Security and audit events, such as changes to user database accounts and roles, were not logged after April 1, 2019 because event logging was not re-enabled when the database software was upgraded. In addition, the log repository used for storing the student administration system's various event logs did not contain any such logs for the system for a ten-month period ending November 1, 2019. FSU personnel advised us that after the student administration system's database server was replaced, a connection to the log repository was not immediately re-established.

Accordingly, monitoring of security and audit activities to detect unauthorized changes could not be performed for this database which supports significant FSU functions, including student admissions, enrollment, financial aid, and student accounts receivable. The USM IT Security Council *Guide for Security Event Logging* requires each institution to maintain appropriate audit trails of events and actions performed related to controlling critical applications and data.

Recommendation 4

We recommend that, for its student administration system, FSU

- a. **log all significant database security and audit events and maintain needed interfaces to log repositories; and**
- b. **generate reports of logged events and ensure that individuals independent of the related support functions perform regular documented reviews of the aforementioned reports, with evidence of reviews retained for future reference.**

Bookstore

Finding 5

FSU did not independently verify that all bookstore collections were deposited and related refunds were proper.

Analysis

FSU did not independently verify that all bookstore collections were deposited and related refunds were proper. Specifically, the verification of recorded collections to deposit was performed using the deposit slip prior to the deposit being made and therefore did not provide any assurance as to the proper disposition of the funds. In addition, three employees responsible for reviewing refunds for propriety also had the ability to process refunds on the FSU cash register system. FSU's cash register system has the capability to prevent an employee from processing and approving the same refund, however this feature was not activated. Instead, refunds were manually recorded by cashiers and approved by supervisory personnel (with system access) on a log after processing in the register system.

According to FSU's records, bookstore revenue totaled approximately \$1.4 million during fiscal year 2019, including credit card and on-line sales. The amount of actual collections and refunds processed directly by bookstore employees was not readily available. The Comptroller of Maryland's *Accounting Procedures Manual* requires reconciliation of recorded cash receipts and amounts deposited by an employee independent of the cash receipts functions.

Recommendation 5

We recommend that FSU ensure that

- a. an employee independent of the cash receipts function verifies all recorded collections to validated bank deposit documentation; and**
- b. no employee can process and approve the same refund by, for example, activating the aforementioned system security feature.**

Audit Scope, Objectives, and Methodology

We have conducted a fiscal compliance audit of the University System of Maryland (USM) – Frostburg State University (FSU) for the period beginning July 1, 2015 and ending August 25, 2019. The audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

As prescribed by the State Government Article, Section 2-1221 of the Annotated Code of Maryland, the objectives of this audit were to examine FSU's financial transactions, records, and internal control, and to evaluate its compliance with applicable State laws, rules, and regulations.

In planning and conducting our audit, we focused on the major financial-related areas of operations based on assessments of significance and risk. The areas addressed by the audit included procurements and disbursements, student accounts receivable, financial aid, cash receipts, payroll, and information technology systems. We also determined the status of the findings contained in our preceding audit report.

Our audit did not include certain support services provided to FSU by the USM Office and the University of Maryland College Park on a centralized basis for several other units of USM, such as bond financing and processing certain construction vendor payments, respectively. These support services are included within the scope of our audits of the USM Office and the University of Maryland College Park. In addition, our audit did not include an evaluation of internal controls over compliance with federal laws and regulations for federal financial assistance programs and an assessment of FSU's compliance with those laws and regulations because the State of Maryland engages an independent accounting firm to annually audit such programs administered by State agencies, including the components of the USM.

To accomplish our audit objectives, our procedures included inquiries of appropriate personnel, inspections of documents and records, observations of FSU's operations, and tests of transactions. Generally, transactions were selected for testing based on auditor judgment, which primarily considers risk. Unless otherwise specifically indicated, neither statistical nor non-statistical audit sampling was used to select the transactions tested. Therefore, the results of the

tests cannot be used to project those results to the entire population from which the test items were selected.

We also performed various data extracts of pertinent information from the State's Financial Management Information System (such as revenue and expenditure data) and the State's Central Payroll Bureau (payroll data), as well as from the contractor administering the State's Corporate Purchasing Card Program (credit card activity). The extracts are performed as part of ongoing internal processes established by the Office of Legislative Audits and were subject to various tests to determine data reliability. We determined that the data extracted from these various sources were sufficiently reliable for the purposes the data were used during this audit.

We also extracted data from FSU's financial systems for the purpose of testing certain areas, such as student accounts receivable and financial aid. We performed various tests of the relevant data and determined that the data were sufficiently reliable for the purposes the data were used during the audit. Finally, we performed other auditing procedures that we considered necessary to achieve our objectives. The reliability of data used in this report for background or informational purposes was not assessed.

FSU's management is responsible for establishing and maintaining effective internal control. Internal control is a process designed to provide reasonable assurance that objectives pertaining to the reliability of financial records; effectiveness and efficiency of operations, including safeguarding of assets; and compliance with applicable laws, rules, and regulations are achieved. As provided in *Government Auditing Standards*, there are five components of internal control: control environment, risk assessment, control activities, information and communication, and monitoring. Each of the five components, when significant to the audit objectives, and as applicable to FSU, were considered by us during the course of this audit.

Because of inherent limitations in internal control, errors or fraud may nevertheless occur and not be detected. Also, projections of any evaluation of internal control to future periods are subject to the risk that conditions may change or compliance with policies and procedures may deteriorate.

Our reports are designed to assist the Maryland General Assembly in exercising its legislative oversight function and to provide constructive recommendations for improving State operations. As a result, our reports generally do not address activities we reviewed that are functioning properly.

This report includes findings relating to conditions that we consider to be significant deficiencies in the design or operation of internal control that could adversely affect FSU's ability to maintain reliable financial records, operate effectively and efficiently, and/or comply with applicable laws, rules, and regulations. Our report also includes findings regarding significant instances of noncompliance with applicable laws, rules, or regulations. Other less significant findings were communicated to FSU that did not warrant inclusion in this report.

The response from the USM Office, on behalf of FSU, to our findings and recommendations is included as an appendix to this report. As prescribed in the State Government Article, Section 2-1224 of the Annotated Code of Maryland, we will advise the USM Office regarding the results of our review of its response.

OFFICE OF THE CHANCELLOR

July 15, 2020

Mr. Gregory A. Hook, CPA
Legislative Auditor
Office of Legislative Audits
State Office Building, Room 1202
301 West Preston Street
Baltimore, MD 21201

Re: University System of Maryland – Frostburg State University
Period of Audit: July 1, 2015 through August 25, 2019

Dear Mr. Hook:

I have enclosed the University System of Maryland's responses to your draft report covering the examination of the accounts and records of the University System of Maryland – Frostburg State University. Our comments refer to the individual items in the report.

Sincerely yours,



Jay A. Perman
Chancellor

Enclosures

cc: Dr. Ronald Nowaczyk, President, Frostburg State University
Mr. Leon L. Wyden, Jr., Vice President, Administration and Finance, Frostburg State University
Ms. Linda R. Gooden, Chair, University System of Maryland Board of Regents
Mr. Robert L. Page, Associate Vice Chancellor for Financial Affairs, USM Office
Mr. David Mosca, Director of Internal Audit, USM Office

**University System of Maryland
Frostburg State University**

Agency Response Form

Contracts and Disbursements

Finding 1
Frostburg State University (FSU) lacked documentation of its compliance with University System of Maryland (USM) Board of Regents procurement policies and procedures regarding the use of contracts established by other organizations, institutions, or agencies. In addition, FSU did not verify that the prices charged were in accordance with the related established contracts.

We recommend that FSU

- a. document, for each applicable contract, the steps it took to comply with USM Board of Regents policies and procedures requiring that its use of contracts established by other organizations, agencies, or institutions is in the best interest of FSU, and that the contracts were properly procured; and**
- b. verify that amounts invoiced by vendors are consistent with the established contract rates.**

Agency Response			
Analysis			
Please provide additional comments as deemed necessary.			
Recommendation 1a	Disagree	Estimated Completion Date:	
Please provide details of corrective action or explain disagreement.	USM policy does not require this documentation. These procurements are considered in the best interest of the institution because they are an effective and efficient means of procurement for a small institution with limited resources as allowed under USM policy. Documentation on the procurement process is maintained by the bidding agency or organization and is available from them upon request.		

Auditor’s Comment: FSU disagreed with our recommendation to document the steps it took to comply with USM Board of Regents policies and procedures to ensure its use of contracts established by other organizations, agencies, or institutions is in the best interest of FSU, and that the contracts were properly procured. Specifically, FSU maintains that USM policy does not require such documentation and the information is maintained by the procuring entity. Our finding acknowledges that USM policy does not specifically address how each university is to implement its policy. However, as noted in our finding, such documentation is necessary to ensure the use of these contracts is compliant with

**University System of Maryland
Frostburg State University**

Agency Response Form

USM policy and in the best interest of FSU. Accordingly, we continue to believe FSU should comply with this fundamental control and document its efforts to comply with the USM policy.

Recommendation 1b	Agree	Estimated Completion Date:	Sept 2020
Please provide details of corrective action or explain disagreement.	FSU issues a purchase order based on a quote issued by the contractor in accordance with a cooperative agreement for the specific job or configuration required by the University. This prevents us from paying more than the accepted quote without a change order being issued. Invoices are reviewed and approved by the procuring department before payment on service and construction invoices. Receivers are required for goods and materials invoices. FSU agrees to better document that the quote agrees to the contract pricing.		

Finding 2
FSU did not have a formal agreement governing construction management services being provided by another State university and did not receive sufficient documentation to monitor these services and ensure the propriety of amounts invoiced by the university.

We recommend that FSU

- a. enter into an MOU with the service center for construction management services as called for by the *USM Construction Service Centers Guide*, and
- b. obtain from the service center a PMER as specified in the *Guide* to help monitor invoices received for all construction projects for which the service center provides management services.

Agency Response	
Analysis	
Please provide additional comments as deemed necessary.	<i>The Construction Service Centers were established by the University System of Maryland's Chancellor under mandate from the Board of Regents (BOR) on May 6, 1994 to manage construction projects at all its institutions. The UMCP Service Center provides these services at six (6) USM institutions, including FSU and three (3) Regional Education Centers. The UMCP Service Center rates apply to all of the institutions its serves and are established with the goal to recover the cost to provide these services.</i>

**University System of Maryland
Frostburg State University**

Agency Response Form

Recommendation 2a	Agree	Estimated Completion Date:	Nov 2019
Please provide details of corrective action or explain disagreement.	The University and the UMCP Service Center signed the MOU in November 2019. It is important to clarify that <u>the only</u> purpose of this MOU is to identify current and upcoming construction projects at FSU to allow the UMCP Service Center maintain proper oversight of delegated projects and establish future workload for capital projects for projects it will manage at FSU. The MOU is not an agreement to provide Project Management Services or to establish Project Management Expense Recovery (PMER) estimates.		
Recommendation 2b	Agree	Estimated Completion Date:	Sept 2020
Please provide details of corrective action or explain disagreement.	For future projects managed by the Service Center, FSU will request PMER estimates.		

Information Systems Security and Control

Finding 3
FSU did not ensure that user access capabilities on its financial management systems were adequately restricted resulting in employees with unnecessary or inappropriate system capabilities.

We recommend that FSU ensure that user access capabilities in its financial management systems are adequately restricted to prevent improper transactions. Specifically, we recommend that FSU

- a. use its annual review of user access capabilities to ensure that system access to perform critical functions is restricted to those employees who require such access for their job duties, and in a manner that ensures a proper segregation of duties and independent review and approval of critical transactions (repeat);
- b. consider conducting reviews of user access capabilities on a more frequent basis than annually; and
- c. address the unnecessary and inappropriate access identified in our finding.

**University System of Maryland
Frostburg State University**

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Agency Response			
Analysis			
Please provide additional comments as deemed necessary.			
Recommendation 3a	Agree	Estimated Completion Date:	Dec 2020
Please provide details of corrective action or explain disagreement.	FSU will continue to review user access capability and ensure the understanding of the roles assigned match the job duties. FSU will also review the segregation of duties, independent review, and approval of critical transactions to see if any improvement can be made based on the limited existing staff without a major impact to student services.		
Recommendation 3b	Agree	Estimated Completion Date:	Dec 2020
Please provide details of corrective action or explain disagreement.	FSU will increase the frequency of review to semi-annual.		
Recommendation 3c	Agree	Estimated Completion Date:	Dec 2020
Please provide details of corrective action or explain disagreement.	FSU will complete a review to determine if there is any unnecessary and inappropriate access. If so, we will take corrective action.		

Finding 4
FSU's procedures for logging and monitoring critical database security and audit events were not adequate.

We recommend that, for its student administration system, FSU

- a. log all significant database security and audit events and maintain needed interfaces to log repositories; and
- b. generate reports of logged events and ensure that individuals independent of the related support functions perform regular documented reviews of the aforementioned reports, with evidence of reviews retained for future reference.

**University System of Maryland
Frostburg State University**

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Agency Response			
Analysis			
Please provide additional comments as deemed necessary.			
Recommendation 4a	Agree	Estimated Completion Date:	Dec 2020
Please provide details of corrective action or explain disagreement.	FSU will ensure database security and audit events are logged and maintained.		
Recommendation 4b	Agree	Estimated Completion Date:	Aug 2020
Please provide details of corrective action or explain disagreement.	FSU will generate and review reports of logged events.		

Bookstore

Finding 5
FSU did not independently verify that all bookstore collections were deposited and related refunds were proper.

We recommend that FSU ensure that

- a. an employee independent of the cash receipts function verifies all recorded collections to validated bank deposit documentation; and**
- b. no employee can process and approve the same refund by, for example, activating the aforementioned system security feature.**

Agency Response	
Analysis	
Please provide additional comments as deemed necessary.	

**University System of Maryland
Frostburg State University**

Agency Response Form

Recommendation 5a	Agree	Estimated Completion Date:	Dec 2019
Please provide details of corrective action or explain disagreement.	One of the associate bookstore managers immediately started verifying and initialing the deposit ticket receipts when they are returned from the bank after we were notified of the issue by OLA.		
Recommendation 5b	Agree	Estimated Completion Date:	Dec 2019
Please provide details of corrective action or explain disagreement.	<p>Prior to the installation of new registers, a manager/reviewer entered their code into the register for the register to be in refund mode. When new registers were installed, this function was not activated. We had that function activated on the same day that the OLA made us aware of the issue. It was an oversight with the installation of the new registers.</p> <p>All refunds are monitored by a reviewer at the time of the refund and then manually recorded into a refund log. This refund log is then verified on the next business day to the reports that print nightly.</p> <p>All refunds receipts are kept with daily paperwork that is filed in the store.</p>		

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