

UNIVERSITY OF WEST FLORIDA

Operational Audit



BOARD OF TRUSTEES AND PRESIDENT

Members of the Board of Trustees and President who served during the 2012-13 fiscal year are listed below:

Lewis Bear, Jr., Vice Chair to 12-13-12,
Chair from 12-14-12
John "Mort" O'Sullivan, Vice Chair from 12-14-12
General Charles A. Horner, Retired, to 1-16-13,
Chair to 12-13-12 (1)
David E. Cleveland
Dr. Pamela J. Dana
Christopher Hill from 4-13-13 (2)
Robert L. Jones
Suzanne Lewis from 1-17-13
Rev. LuTimothy May from 4-15-13
J. Collier Merrill to 4-14-13 (1)
Cora Merritt to 4-12-13 (2)
Susan K. O'Connor
Jayprakash "Jay" S. Patel
Dr. Chris Pomory (3)
Bentina C. Terry
Garrett W. Walton

Dr. Judith A. Bense, President

Notes: (1) Board member served beyond the end of term,
January 6, 2013.
(2) Student body president.
(3) Faculty Senate Chair.

The audit team leader was Joseph D. Dykes, CPA, and the audit was supervised by James W. Kiedinger, Jr., CPA. For the information technology portion of this audit, the audit team leader was Clayton Dyer, and the supervisor was Heidi G. Burns, CPA, CISA. Please address inquiries regarding this report to James R. Stultz, CPA, Audit Manager, by e-mail at jimstultz@aud.state.fl.us or by telephone at (850) 412-2869.

This report and other reports prepared by the Auditor General can be obtained on our Web site at www.myflorida.com/audgen; by telephone at (850) 412-2722; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.

UNIVERSITY OF WEST FLORIDA

EXECUTIVE SUMMARY

ADMINISTRATIVE MANAGEMENT AND BOARD POLICIES

Finding No. 1: The University needed to strengthen its procedures to ensure that potential conflicts of interest are identified and evaluated.

Finding No. 2: The Board needed to adopt written policies and procedures relating to electronic funds transfers.

PROCUREMENT OF GOODS AND SERVICES

Finding No. 3: The University needed to improve controls over its purchasing card program.

CONFIDENTIAL INFORMATION

Finding No. 4: The University did not always provide written notification to individuals when their social security numbers were collected, contrary to Section 119.071(5)(a), Florida Statutes.

INFORMATION TECHNOLOGY

Finding No. 5: The University's information technology security controls related to user authentication and data loss prevention needed improvement.

BACKGROUND

The University of West Florida (University) is part of the State university system of public universities, which is under the general direction and control of the Florida Board of Governors. The University is directly governed by a Board of Trustees (Trustees) consisting of 13 members. The Governor appoints 6 citizen members and the Board of Governors appoints 5 citizen members. These members are confirmed by the Florida Senate and serve staggered terms of five years. The faculty senate chair and student body president also are members.

The Board of Governors establishes the powers and duties of the Trustees. The Trustees are responsible for setting University policies, which provide governance in accordance with State law and Board of Governors' Regulations. The University President is selected by the Trustees and confirmed by the Board of Governors. The University President serves as the executive officer and the corporate secretary of the Trustees and is responsible for administering the policies prescribed by the Trustees for the University.

The results of our financial audit of the University for the fiscal year ended June 30, 2013, will be presented in a separate report. In addition, the Federal awards administered by the University are included within the scope of our Statewide audit of Federal awards administered by the State of Florida and the results of that audit, for the fiscal year ended June 30, 2013, will be presented in a separate report.

FINDINGS AND RECOMMENDATIONS

Administrative Management and Board Policies

Finding No. 1: Conflicts of Interest

Pursuant to Section 112.313(3), Florida Statutes, no University employee acting in his or her official capacity as a purchasing agent, or public officer acting in his or her official capacity, may either directly or indirectly purchase, rent,

or lease any realty, goods, or services for the University from any business entity in which the officer or employee or the officer's or employee's spouse or child is an officer, partner, director, or proprietor, or in which such officer or employee or the officer's or employee's spouse or child, or any combination of them, has a material interest. Pursuant to Section 112.313(7)(a), Florida Statutes, no University officer or employee may have or hold any employment or contractual relationship with any business entity or agency that is subject to the regulation of, or is doing business with, the University. This Section further prohibits a University officer or employee from having or holding any employment or contractual relationship that will create a continuing or frequently recurring conflict between his or her public duties, or that would impede the full and faithful discharge of his or her duties.

The University adopted several policies that prohibit conflicts of interest. In addition, the University required employees to notify the University Human Resources Department of business and other relationships that could potentially result in conflicts of interest and developed a form for University employees to provide this notification. University employees submitted 115 conflict of interest forms to the Human Resources Department during the 2012-13 fiscal year. However, the forms were not provided to Procurement and Contracts Department personnel for their use in determining if potential conflicts of interest exist that should be considered when entering into procurement transactions or contractual obligations. Although our limited tests disclosed no apparent conflicts of interest, when potential conflicts of interest are not properly evaluated, there is an increased risk that the University may not timely identify and prevent transactions that represent conflicts of interest.

Recommendation: The University should strengthen its procedures to ensure that conflict of interest forms are provided to the Procurement and Contracts Department for review and determination of whether any conflicts of interest exist regarding University employees and vendors doing business with the University.

Finding No. 2: Electronic Funds Transfers

Section 1010.11, Florida Statutes, requires each university board of trustees to adopt written policies prescribing the accounting and control procedures under which funds are allowed to be moved by electronic transaction for any purpose including direct deposit, wire transfer, withdrawal, investment, or payment. This law also requires that electronic transactions comply with the provisions of Chapter 668, Florida Statutes, which discusses the use of electronic signatures in electronic transactions between universities and other entities.

According to University records, \$67.8 million in electronic funds transfers were made during the 2012-13 fiscal year for electronic payments to vendors and benefit providers. Our review disclosed that, although University management had established a written electronic funds transfer policy that included accounting and control procedures, this policy had not been approved by the Board. The lack of specific guidance in the form of Board-approved written policies and procedures increases the risk that electronic transactions will not be executed in accordance with Board directives and the provisions of Chapter 668, Florida Statutes.

Recommendation: The Board should adopt written policies and procedures to prescribe accounting and control procedures for electronic funds transfers, including the use of electronic signatures.

Procurement of Goods and Services
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Finding No. 3: Purchasing Cards

The University established a Purchasing Card (P-card) program, which gives employees the convenience of purchasing items without using the standard purchase order process. P-cards were designed to provide a cost effective, convenient, and decentralized method for individuals to make certain business purchases on behalf of the University. As of June 30, 2013, the University had issued 400 P-cards to employees and P-card charges totaled \$10.6 million for the 2012-13 fiscal year.

The University established written guidelines for the use of P-cards. These procedures include guidance to help users make appropriate purchases with P-cards and also identify prohibited purchases. For example, P-card users are not permitted to purchase office supplies from vendors other than the University's official office supply vendor, and are not permitted to pay charges from a third-party credit card processor.

Our test of 41 P-card transactions, totaling \$238,522 from 32 cardholder accounts, disclosed that the University's monitoring controls needed improvement, as follows:

- For 3 purchases, totaling \$863, University records did not include detailed receipts documenting the items purchased. As such, University records did not evidence that these purchases served an authorized public purpose. Subsequent to our inquiry, University personnel obtained a detailed receipt for one of the purchases for \$405 from the vendor indicating that the expenditure was for detailing of University vehicles.
- For 6 purchases, totaling \$33,485, University records supporting the purchases did not evidence that these purchases served an authorized public purpose. Subsequent to our inquiry, University personnel provided us with information demonstrating that these purchases served an authorized public purpose and were in accordance with the University's P-card guidelines.
- For 3 purchases totaling \$3,958 (\$2,340 for lab supplies, \$1,363 for office supplies, and \$255 for food), the purchased goods and services were prohibited by University P-card guidelines. The purchase for lab supplies included a payment to a third-party credit card processor. The office supplies were purchased from a vendor other than the University's office supply vendor and the documentation did not show that either a lower price was obtained or the product was not available from the contracted vendor. The food purchases were paid from University funds for which food purchases are prohibited.

We expanded our review to include an analysis of P-card records to determine the extent of purchases from third-party credit card processors. Our analysis disclosed that University P-cards were used to purchase goods and services, excluding conference registration fees, totaling \$41,904 through third-party credit card processors during the 2012-13 fiscal year. Unless for conference registration fees, University P-card guidelines prohibit payments to third-party credit card processors because the vendor providing the goods or services is masked and unidentifiable. Subsequent to our inquiries, University personnel revised University P-Card guidelines to allow purchases from specified third-party credit card processors.

Effective monitoring procedures over P-card purchases, which include ensuring that the authorized public purpose and the vendor providing the goods and services are documented, decrease the risk of unauthorized purchases without timely detection.

Recommendation: The University should enhance its P-card monitoring controls to ensure compliance with the University's P-card guidelines. Also, for those purchases noted above for which there were no detailed receipts, the University should request that the P-card holders provide such receipts or other documentation demonstrating the public purpose served or seek reimbursement from the P-card holders.

Confidential Information

Finding No. 4: Collection of Social Security Numbers

The Legislature has acknowledged in Section 119.071(5)(a), Florida Statutes, the necessity of collecting social security numbers (SSNs) for certain purposes because of its acceptance over time as a unique numeric identifier for identity verification and other legitimate purposes. The Legislature has also recognized that SSNs can be used to acquire sensitive personal information, the release of which could result in fraud against individuals or cause other financial or personal harm. Therefore, public entities are required to provide extra care in maintaining such information to ensure its confidential status.

Section 119.071(5)(a), Florida Statutes, provides that the University may not collect an individual's SSN unless the University has stated in writing the purpose for its collection and unless it is specifically authorized by law to do so, or is imperative for the performance of the University's duties and responsibilities as prescribed by law. Additionally, this Section requires that if the University collects an individual's SSN, it must provide that individual with a written statement indicating whether the collection of the SSN is authorized or mandatory under Federal or State law, and identifying the specific Federal or State law governing the collection, use, or release of SSNs for each purpose for which the SSN is collected. This Section also provides that SSNs collected by the University may not be used for any purpose other than the purpose provided in the written statement. This Section further requires that the University review whether its collection of SSNs is in compliance with the above requirements and immediately discontinue the collection of SSNs for purposes that are not in compliance.

Although the University has assigned unique student and employee identification numbers to replace using SSNs for record keeping purposes, it continued to obtain SSNs from students and employees for certain purposes. Our review disclosed that several University forms (i.e., a readmission application, a FICA alternative plan distribution form, a Florida Retirement System certification form, and a transcript request form), either available on-line or in hard copy at the University, requested an individual's SSN but did not include a written notification indicating the purpose for which the SSN was collected, the specific Federal or State law governing the collection, use, or release of the SSN, or whether the collection was authorized or mandatory under Federal or State law.

Effective controls to properly monitor the need for and use of SSNs and to ensure compliance with statutory requirements reduces the risk that SSNs may be used for unauthorized purposes. A similar finding was noted in report No. 2011-020.

Recommendation: **The University should continue its efforts to comply with Section 119.071(5)(a), Florida Statutes.**

Information Technology

Finding No. 5: Security Controls – User Authentication and Data Loss Prevention

Security controls are intended to protect the confidentiality, integrity, and availability of data and information technology (IT) resources. Our audit disclosed that certain University security controls related to user authentication and data loss prevention needed improvement. We are not disclosing specific details of the issues in this report to avoid the possibility of compromising University data and IT resources. However, we have notified appropriate University management of the specific issues. Without adequate security controls related to user authentication and

data loss prevention, the risk is increased that the confidentiality, integrity, and availability of University data and IT resources may be compromised.

Recommendation: The University should improve IT security controls related to user authentication and data loss prevention to ensure the continued confidentiality, integrity, and availability of University data and IT resources.

PRIOR AUDIT FOLLOW-UP

The University had not taken corrective action for finding No. 4, which was also noted in prior audit report No. 2011-020, as finding No. 1.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit from February 2013 to December 2013 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.

The objectives of this operational audit were to:

- Evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering assigned responsibilities in accordance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines.
- Examine internal controls designed and placed in operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, reliability of records and reports, safeguarding of assets, and identifying weaknesses in those controls.
- Determine whether management had taken corrective actions for findings included in our report No. 2011-020.
- Identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

This audit was designed to identify, for those programs, activities, or functions included within the scope of the audit, deficiencies in management's internal controls; instances of noncompliance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines; and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular transactions, legal compliance matters, records, and controls considered.

For those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function;

exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

The scope and methodology of this operational audit are described in Exhibit A. Our audit included the selection and examination of records and transactions occurring during the 2012-13 fiscal year. Unless otherwise indicated in this report, these records and transactions were not selected with the intent of projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature does not include a review of all records and actions of agency management, staff, and vendors, and as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, waste, abuse, or inefficiency.

AUTHORITY

Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.



David W. Martin, CPA
Auditor General

MANAGEMENT'S RESPONSE

Management's response is included as Exhibit B.

EXHIBIT A
AUDIT SCOPE AND METHODOLOGY

Scope (Topic)	Methodology
Information technology (IT) policies and procedures.	Reviewed the University’s written IT policies and procedures to determine whether they addressed certain important IT control functions.
IT access privileges and separation of duties.	Reviewed procedures for maintaining and reviewing access to IT resources. Tested selected access privileges over the operating system, network, and the finance, human resources, and student financial aid applications to determine the appropriateness and necessity based on the employees’ job duties and user account functions and adequacy with regard to preventing the performance of incompatible duties.
IT logical access controls and user authentication.	Reviewed selected operating system, database, network, and application security settings to determine whether authentication controls were configured and enforced in accordance with IT best practices.
IT data loss prevention.	Reviewed the University’s written security policies, procedures, and programs in effect governing the classification, management, and protection of sensitive and confidential information.
IT logging and monitoring.	Reviewed procedures and reports related to the capture, review, maintenance, and retention of selected system and security event logs.
IT security incident response.	Reviewed the University’s written policies and procedures, plans, and forms related to security incident response and reporting.
Board and committee meetings.	Reviewed Board and committee minutes to determine whether Board approval was obtained for policies and procedures in effect during the audit period and for evidence of compliance with Sunshine Law requirements (i.e., proper notice of meetings, ready access to public, and maintenance of minutes).
Fraud policy and related procedures.	Determined whether the University had developed a fraud policy and procedures to provide guidance to employees for communicating known or suspected fraud to appropriate individuals.
Social security number requirements of Section 119.071(5)(a), Florida Statutes.	Examined supporting documentation to determine whether the University had provided individuals with a written statement of the purpose of collecting their social security numbers.
Conflicts of interest.	Determined whether the University had established policies and procedures to avoid potential conflicts of interest.
Related-party transactions.	For selected University officials, reviewed Department of State, Division of Corporation records; statements of financial interest; and University records to identify any potential relationships that represent a conflict of interest.
Journal entries.	Tested selected journal entries to determine whether they were properly supported and accurately recorded.

EXHIBIT A (CONTINUED)
AUDIT SCOPE AND METHODOLOGY

Scope (Topic)	Methodology
Textbook affordability.	Examined supporting documentation to determine whether the University's procedures regarding textbook affordability were in accordance with Section 1004.085, Florida Statutes.
Identity theft prevention program (Red Flags Rule).	Reviewed University policies and procedures related to its identity theft prevention program for compliance with the Federal Trade Commission's Red Flags Rule.
Internal audit function (inspector general).	Reviewed the internal audit function to determine whether the University followed professional requirements and provided for peer review of reports issued.
Investments.	Determined whether the Board established investment policies and procedures as required by Section 218.415, Florida Statutes, and whether investments during the fiscal year were in accordance with those policies and procedures.
Annual physical inventory of property.	Reviewed University rules and procedures related to performing annual inventory counts of property. Reviewed selected documentation of the University's annual physical property inventory to determine whether the counts were in accordance with rules and procedures.
Distance learning fees.	Determined whether distance learning fees were assessed and collected as provided by Section 1009.24(17), Florida Statutes.
Transient student admission.	Determined whether the University complied with the requirements to implement a separate admission process for transient students as required by Section 1006.73(5)(c), Florida Statutes.
Cash collection procedures at decentralized collection points.	Reviewed collection procedures at selected locations and tested daily cash collections to determine the effectiveness of the University's collection procedures.
Terminal pay.	Reviewed the University's policies and procedures for terminal pay to ensure consistency with Florida law. Tested former employees to determine appropriateness of terminal pay.
Severance pay.	Reviewed severance pay provisions in selected contracts to determine whether the University was in compliance with Florida Statutes.
Administrative employees' compensation.	Reviewed administrative employees' compensation to determine whether compensation did not exceed limits provided in Florida law.
President's compensation.	Determined whether the President's compensation was in accordance with Florida law, Board of Governors Regulations, and University policy.
Electronic funds transfers and payments.	Reviewed University policies and procedures related to electronic funds transfers and payments. Tested supporting documentation to determine whether selected electronic funds transfers and payments were properly authorized and supported.

EXHIBIT A (CONTINUED)
AUDIT SCOPE AND METHODOLOGY

Scope (Topic)	Methodology
Purchasing card transactions.	Tested transactions to determine whether purchasing cards were administered in accordance with University policies and procedures.
Travel expenses.	Tested selected travel expenses to determine whether the travel was reasonable, adequately supported, and for University purposes.
Construction administration.	For selected major construction projects, tested payments and supporting documentation to determine compliance with University policies and procedures and provisions of laws and rules. Also, for construction management contracts, determined whether the University monitored the selection process of architects and engineers, construction managers, and subcontractors by the construction manager.
Rebate revenues.	Determined whether rebate revenues received from its purchasing card program were allocated to the appropriate University funds.
Grant administration.	For a selected grant program, determined whether the University administered the grant in accordance with significant grant provisions.

**EXHIBIT B
MANAGEMENT’S RESPONSE**



Office of the President
11000 University Parkway
Pensacola, FL 32514-5750

January 24, 2014

David W. Martin, CPA
Auditor General
State of Florida
G74 Claude Pepper Building
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Mr. Martin:

This is the University of West Florida’s acknowledgement of and response to the preliminary and tentative findings and recommendations, as transmitted by your correspondence of January 10, 2014. The responses relate to your operational audit on

The University of West Florida
For the Fiscal Year Ended June 30, 2013.

Finding 1:

The University needed to strengthen its procedures to ensure that potential conflicts of interest are identified and evaluated.

Recommendation:

The University should strengthen its procedures to ensure that conflict of interest forms are provided to Procurement and Contracts Department for review and determination of whether any conflicts of interest exist regarding University employees and vendors doing business with the University.

UWF Response:

UWF Human Resources will create a shared folder (Outside Activity Forms) that UWF Procurement and Contracts (P&C) can access to check vendors listed on requisitions and determine if there is any potential conflict of interest before processing a purchase order. If P&C has any concerns they will review the physical copy in employee’s file for more details. If a potential conflict of interest appears, the employee and supervisor will be notified for an explanation and a determination will be made whether to move forward or cancel the requisition. P&C is developing a Standard Operating Procedure (SOP) that addresses this review process, the UWF Conflict of Interest Policy, and what steps are taken to identify and evaluate potential conflicts of interest for the university. Estimated completion date of the SOP is March 14, 2014.

Finding 2:

The Board needed to adopt written policies and procedures relating to electronic funds transfers.

Recommendation:

The Board should adopt written policies and procedures to prescribe accounting and control procedures for electronic funds transfers, including the use of electronic signatures.

Phone 850.474.2200 Fax 850.474.3131
Web uwf.edu/president
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EXHIBIT B (CONTINUED)
MANAGEMENT'S RESPONSE

2

UWF Response:

The UWF Board of Trustees approved the University's Electronic Funds Transfer Policy at the December 13, 2013, BOT meeting.

Finding 3:

The University needed to improve controls over its purchasing card program.

Recommendation:

The University should enhance its PCard monitoring controls to ensure compliance with the University's PCard guidelines. Also, for those purchases noted in the audit reports for which there were no detailed receipts, the University should request that the PCardholders provide such receipts or other documentation demonstrating the public purpose served or seek reimbursement from the PCardholders.

UWF Response:

The UWF PCard Reference Guide sections addressing the use of third party credit card processors and the University's official office supply vendors have been updated. The entire PCard Reference Guide has been reviewed in its entirety and significant updates will be made by February 28, 2014. Additionally, Procurement & Contracts (P&C) will also adopt the practice of sending out notices via @UWF or email blasts periodically informing UWF employees and specifically PCard holders of their responsibilities regarding the PCard program, including the need to provide detailed receipts documenting the authorized business purpose of expenditures.

Finding 4:

The University did not always provide written notification to individuals when their social security numbers were collected, contrary to Section 119.071(5)(a), Florida Statutes.

Recommendation:

The University should continue its efforts to comply with Section 119.071(5)(a).

UWF Response:

Financial Services will continue to remind staff of the requirement to provide a purpose and reference when posting forms requesting SSN's and encourage staff to be vigilant as to occurrences coming from other areas of campus.

The Departments in Enrollment Affairs have adjusted all forms that indicate a social security number will be collected and preference the option to provide the Student ID, in addition to including the following statement:

In accordance with the requirements of Florida law (Section 119.071, Florida Statutes), the University of West Florida collects social security numbers only if specifically authorized or required by law or if imperative for the performance of the University's duties and responsibilities. As indicated in this form, the University prefers that you use your Student ID number in lieu of the SSN. However, if you do not know your Student ID, the SSN must be used for matching purposes. In such event the use of the SSN is a business imperative and is authorized for collection under Section 119.071(5)(a)(2)(a)(II), F.S. Please visit <http://uwf.edu/uwfid/internal/policies.cfm> for UWF's policy on the use of social security numbers.

EXHIBIT B (CONTINUED)
MANAGEMENT'S RESPONSE

3

Finding 5:

The University's information technology security controls related to user authentication and data loss prevention needed improvement.

Recommendation:

The University should improve IT security controls related to user authentication and data loss prevention to ensure the continued confidentiality, integrity, and availability of University data and IT resources.

UWF Response:

The University of West Florida, along with other Florida public universities, takes guidance on user authentication standards and best practices primarily from the National Institute of Standards and Technology (NIST) publication 800-118 *Guide to Enterprise Password Management*. The University has considered the Auditor General's specific recommendations in light of that NIST guidance and in consultation with the Board of Governors' Office of Information Resource Management and other Florida public universities. As a result, we will implement four improved controls on user authentication that are consistent with NIST guidelines. These improvements shall be in place by July 2014.

Regarding data loss prevention, the university is currently developing an updated institutional data dictionary, which is being implemented as part of our Banner ERP system implementation. Part of the data dictionary project shall be to define data security classification levels and to identify the security level of each data element in the dictionary. The university shall also implement a documented data loss prevention plan and procedures keyed to the data classification scheme. This plan shall be in place by the end of 2014.

We continue to find the Auditor General provides constructive assistance to us, as we strive to maintain an acceptable level of accountability.

Sincerely,



Judith A. Bense, Ph.D.
President

Enclosures:

UWF Electronic Funds Transfer Policy

cc: UWF BOT Chairman
UWF BOT Audit & Operations Committee
Dr. Martha Saunders, Provost
Dr. Susan Stephenson, Vice President Business, Finance, & Facilities
Dr. Kim Brown, Vice President/Chief of Staff
Ms. Pat Lott, Interim General Counsel
Dr. George Ellenberg, Vice Provost
Mr. Mike Dieckmann, Chief Information Officer
Ms. Colleen Asmus, Associate Vice President/Controller
Ms. Betsy Bowers, Associate Vice President, Internal Auditing
Ms. Cindy Faria, Associate Vice President, Human Resources
Ms. Joffery Gaymon, Assistant Vice President, Enrollment Affairs
Ms. Angie Jones, Director, Procurement