

**Notice of Meeting  
UNIVERSITY OF HAWAI'I**

**BOARD OF REGENTS COMMITTEE ON INDEPENDENT AUDIT**

Members: Regents Kudo (Chair), Acoba (Vice-Chair), Higaki, Nahale-a, and Paloma

**Date:** Thursday, August 5, 2021

**Time:** 8:30 a.m.

**Place:** **Virtual Meeting**

*In light of the evolving COVID-19 situation, protecting the health and welfare of the community is of utmost concern. As such, this will be a virtual meeting and written testimony and oral testimony will be accepted in lieu of in-person testimony. Meetings may be monitored remotely via the livestream pilot project. See the Board of Regents website for information on accessing the livestream: [www.hawaii.edu/bor](http://www.hawaii.edu/bor). Mahalo for your consideration.*

**AGENDA**

**I. Call Meeting to Order**

**II. Approval of Minutes of the June 2, 2021 Meeting**

**III. Public Comment Period for Agenda Items:**

All written testimony on agenda items received after posting of this agenda and up to 24 hours in advance of the meeting will be distributed to the board. Late testimony on agenda items will be distributed to the board within 24 hours of receipt. Written testimony may be submitted via the board's website through the testimony link provided on the [Meeting Agendas, Minutes and Materials](#) page. Testimony may also be submitted via email at [bor.testimony@hawaii.edu](mailto:bor.testimony@hawaii.edu), U.S. mail, or facsimile at (808) 956-5156. All written testimony submitted are public documents. Therefore, any testimony that is submitted for use in the public meeting process is public information and will be posted on the board's website.

Those wishing to provide oral testimony for the virtual meeting may register [here](#). Given constraints with the online format of our meetings, individuals wishing to orally testify must register no later than 7:00 a.m. on the day of the meeting in order to be accommodated. It is highly recommended that written testimony be submitted in addition to registering to provide oral testimony. Oral testimony will be limited to three (3) minutes per testifier.

**IV. Agenda Items**

A. Committee Work Plan

B. Office of Internal Audit – Audit Plan Development

C. Update on Office of Internal Audit Emergency Response Plan

D. Audit Project Status Update

**V. Adjournment**

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For disability accommodations, contact the Board Office at 956-8213 or [bor@hawaii.edu](mailto:bor@hawaii.edu).  
Advance notice requested five (5) days in advance of the meeting.

**DISCLAIMER – THE FOLLOWING ARE DRAFT MINUTES AND ARE SUBJECT TO FURTHER REVIEW AND CHANGE UPON APPROVAL BY THE COMMITTEE**

**MINUTES**

**BOARD OF REGENTS COMMITTEE ON INDEPENDENT AUDIT MEETING**

**JUNE 2, 2021**

**Note:** On January 30, 2020, the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern, subsequently declaring it a pandemic on March 11, 2020. On March 16, 2020, Governor David Y. Ige issued a supplementary proclamation that temporarily suspended Chapter 92, Hawai'i Revised Statutes (HRS), relating to public meetings and records, "to the extent necessary to enable boards to conduct business in person or through remote technology without holding meetings open to the public."

**I. CALL TO ORDER**

Chair Randy Moore called the meeting to order at 10:16 a.m. on Wednesday, June 2, 2021. The meeting was conducted virtually with regents participating from various locations.

Committee members in attendance: Chair Randy Moore; Vice-Chair Alapaki Nahale-a; Regent Simeon Acoba; and Regent Ernest Wilson.

Committee members excused: Regent Wayne Higaki.

Others in attendance: Board Chair Benjamin Kudo; Regent Eugene Bal; Regent Robert Westerman (ex officio committee members); President David Lassner; Vice President (VP) for Administration Jan Gouveia; VP for Legal Affairs/University General Counsel Carrie Okinaga; VP for Research and Innovation Vassilis Syrmos; VP for Information Technology/Chief Information Officer Garret Yoshimi; VP for Budget and Finance/Chief Financial Officer Kalbert Young; UH Mānoa (UHM) Provost Michael Bruno; UH Hilo Chancellor Bonnie Irwin; UH West O'ahu Chancellor Maenette Benham; Executive Administrator and Secretary of the Board of Regents (Board Secretary) Kendra Oishi; and others as noted.

**II. APPROVAL OF MINUTES**

Regent Wilson moved to approve the minutes of the May 6, 2021, meeting, seconded by Vice-Chair Nahale-a, and noting the excused absence of Regent Higaki, the motion carried, with all members present voting in the affirmative.

**III. PUBLIC COMMENT PERIOD**

Board Secretary Oishi announced that written comments requesting an audit of Hawai'i Community College (HawCC) was submitted by Helen Nishimoto and Jeff Yamauchi and that no individuals signed up to provide oral testimony.

#### IV. AGENDA ITEMS

##### **A. Review and Acceptance of the University of Hawai'i Audited Financial and Compliance Report for the Year Ended June 30, 2020**

Ms. Jamie Asato, with Accuity LLP, provided an overview of Accuity's compliance reports in connection with the audit of the university's consolidated financial statements for the year ended June 30, 2020, highlighting that these reports addressed the single audit conducted by Accuity, which is a federally required audit performed on non-federal entities that expend \$750,000 or more in federal awards during the entity's fiscal year and consist of both financial and compliance reviews regarding federal rules and regulations. She reviewed the various components of the single audit report including compliance reports; schedule of expenditures of federal awards; schedule of findings and questioned costs; financial statements; and a summary schedule of prior audit findings and associated corrective action plans prepared by management. While the 2020 audit did not find significant risks, exposures, weaknesses, difficulties, material uncertainties, acts of fraud, or illegal activities, it was noted that five compliance findings regarding federal award expenditure requirements were discovered, a decrease from eight discovered in the 2019 audit. Although two of the findings noted were repeat findings, Accuity has determined that none of these findings were material or significant and were deemed to be associated with minor internal control deficiencies. Management has also addressed the majority of the findings contained within the 2019 audit and has submitted a corrective action plan in response to the five findings associated with the 2020 audit.

Regent Wilson moved to accept the University of Hawai'i audited financial and compliance report for the year ended June 30, 2020, seconded by Vice-Chair Nahale-a, and noting the excused absence of Regent Higaki, the motion carried, with all members present voting in the affirmative.

##### **B. Review and Acceptance of Internal Control and Business Issues Report**

##### **C. Corrective Action Responses for the Internal Control and Business Issues Report**

Ms. Asato summarized the report on internal control and business issues noting that this report consisted mainly of comments and observations from Accuity that were noted in the course of conducting the audit of the consolidated financial statements and compliance reports of the university. She stated that in 2020 there were four comments regarding issues involving either university or Board of Regents (board) policies but that these issues were not significant. She noted that five comments were made during last year's audit with two of those issues being resolved and three carrying forward.

Regent Westerman expressed his concerns regarding the recurring issues identified in Accuity's report and opined that the university needs to continue to improve in this area so that it can remain policy compliant and not be subject to fines, particularly from the federal government.

Chair Moore stated that, while some of the issues reported on are recurring, this is something that will periodically occur in an organization as large as the university. It would be troublesome, however, if it was discovered that an individual was repeatedly responsible for the same issue of non-compliance and it would behoove the administration to take appropriate corrective action if such an instance occurred. VP Syrmos clarified that the compliance issues identified in Accuity's report dealt with purchase orders and submission of timely travel completion reports. None of the individuals responsible for non-compliance were repeat offenders. UHM is also working closely with the Research Corporation of the University of Hawai'i to mitigate the risks of non-compliance regarding purchase orders.

Cory Kubota, with Accuity LLP, clarified some of the reasons for non-compliance with university or board policies and stated that Accuity does conduct annual follow-up meetings with individuals and departments where instances of non-compliance have occurred.

Regent Acoba asked if some of the issues identified in the audited financial and compliance reports are reflected in the internal control and business issues report. Mr. Kubota explained that the issues identified in the audited financial and compliance reports pertain to non-compliance issues specific to federal dollars with the potential for an awarding agency to return to the university with a request for repayment. Issues identified in the internal control and business issues report addressed compliance with university or board policies. Ms. Asato added that the issues identified in each report may be applicable to the same transactions but that the standards for non-compliance differ.

Noting that the untimely submission of travel completion reports appears to be a recurring issue every year, Regent Acoba stated that it appeared the administration needed to increase its efforts to ensure compliance with travel reporting policies.

Vice-Chair Nahale-a moved to accept the internal control and business issues report, seconded by Regent Acoba, and noting the excused absence of Regent Higaki, the motion carried, with all members present voting in the affirmative.

Ms. Asato noted that the corrective action response for the internal control and business issues report was simply the university administration's response to the report. Chair Moore added that the administration's corrective action response indicated that management has addressed all of the issues noted by Accuity.

#### **D. Approval of Annual Review of the Committee Charter**

Chair Moore explained that the charter of the Committee on Independent Audit is prescribed in statute. Although legislation was passed this year to amend the statute governing the committee, it has not yet been enacted. As such, the committee charter remains unchanged. He asked if committee members had any questions or concerns regarding the committee charter and none were raised.

Regent Wilson moved to approve the annual review of the committee charter, seconded by Regent Acoba, and noting the excused absence of Regent Higaki, the motion carried, with all members present voting in the affirmative.

**E. Approval of Proposed Internal Audit Work Plan (Work Plan) for 2021-2022 and Discussion on Utilization of the Office of Internal Audit (OIA)**

Glenn Shizumura, Director of OIA, explained that the proposed Work Plan was the outline for work to be performed by OIA during the coming year stating that it was developed in consultation with the administration. He furnished a summary of services provided by OIA, including services to the university's external auditor, Accuity, LLP, and services provided to the committee, and presented a breakdown of new, carryover, and follow-up projects for the 2021-2022 fiscal year.

Chair Moore remarked that, while the committee approves the Work Plan, it is a dynamic document that can be amended to include additional projects over the course of the year should the need arise and subject to approval of the committee.

Regent Wilson asked whether OIA would be conducting a follow-up audit on the use of federal stimulus money provided to the university as this was not noted in the Work Plan. Internal Auditor Shizumura replied that the use of federal stimulus funds would be subject to the audit of the university's consolidated financial statements conducted by Accuity. Since the majority of federal stimulus monies were received in 2021, this information should be reflected in Accuity's report on the audited financial and compliance reports for the year ended June 30, 2021.

Vice-Chair Nahale-a left at 10:49 a.m.

Chair Moore stated that a meeting to discuss how the committee could better utilize the services of OIA in the future will be scheduled next year. He noted that he asked Internal Auditor Shizumura to provide information to the committee on the processes used by other university auditors to develop work plans at their respective institutions. This will provide the committee with better context for establishing a Work Plan.

Regent Acoba requested clarification on the follow-up audit on real property lease management; the apparent lack of cooperation on the audit conducted on the Vietnam Executive Master of Business Administration (VEMBA) Program and whether consideration has been given to inviting individuals from VEMBA to a meeting of the committee to discuss questions raised by OIA; and the gist of the evaluation of the status of corrective action for Maunakea. Internal Auditor Shizumura replied that OIA will be reporting on the initial audit for real property lease management later in this agenda and a follow-up audit will be conducted in calendar year 2022 to determine the status of any recommended corrective actions. OIA did request assistance from UHM Provost Bruno regarding VEMBA and additional information was provided by the program. However, due to personnel changes and retirements, obtaining additional information has been challenging and OIA has elected to issue an interim report based on initial findings and conduct follow-up procedures to obtain additional information at a later date. OIA has also been working with the Associate Director of the Institute for

Astronomy (IfA) in addressing recommendations made regarding the accounting and administrative functions of IfA's support services group. Given that IfA is addressing a number of pressing matters, finding a suitable time to meet and review this issue has been difficult. However, OIA notes that of the five recommendations made regarding Maunakea, three have been implemented and follow-up was being conducted on the remaining two items. It was also noted that the items for corrective action noted by OIA were not substantial.

Regent Wilson moved to approve the Work Plan, seconded by Regent Acoba, and noting the excused absences of Vice-Chair Nahale-a and Regent Higaki, the motion carried, with all members present voting in the affirmative.

#### **F. Review and Acceptance of Draft Committee on Independent Audit Annual Report to the Board**

Chair Moore explained that the committee's annual report to the board is prepared by OIA pursuant to Section 304A-321, HRS, and the board bylaws. This annual report includes OIA's audit results for the fiscal year ended June 30, 2021, which summarizes the services provided during the past fiscal year and projects included in last year's audit plan with current status, findings, and recommendations.

Regent Acoba asked about the resignation of Mr. David Estes, an internal auditor of OIA, and whether this occurred in the normal course of employment. Internal Auditor Shizumura responded in the affirmative stating that Mr. Estes was afforded an opportunity to pursue another career and submitted his resignation to OIA in July 2020.

Regent Wilson moved to accept the draft Committee on Independent Audit annual report to the board, seconded by Regent Acoba, and noting the excused absences of Vice-Chair Nahale-a and Regent Higaki, the motion carried, with all members present voting in the affirmative.

#### **G. Overview of Processes for Student Account Receivables and Collections**

Amy Kunz, Associate Vice President (AVP) for Budget and Finance and University Controller, reported on the university's policies, procedures, and processes for managing student accounts receivable and the collection of delinquent accounts. It was noted that student accounts include any charges for fees, services, and programs applicable to students and that accounts are considered past-due as of the last day to add or drop courses at 100 percent except under certain, specific conditions such as enrollment in a payment plan, pending financial-aid disbursements, or third-party contracts for payments. If the past-due balance for a student account is \$200 or more, the student is prohibited from registering for future terms. In addition, the release of student transcripts is prohibited for any past-due balance on a student account.

An overview of the process used to determine the financial obligations of a student and account delinquency, as well as notifications, actions, and efforts employed in the collection of delinquent accounts, including the use of four external collection agencies, was provided by AVP Kunz. She also reviewed the laws, administrative rules, and policies related to the collection of delinquent accounts.

A breakdown of past-due account balances was presented and included total outstanding account balances to date; approved to be written off; referred to collections; and enrolled in a debt repayment plan. As of May 21, 2021, the cumulative past-due account balance stood at approximately \$30.28 million which was a decrease of approximately \$7.5 million since April 2021. AVP Kunz stated that the financial management office continues to work toward reducing outstanding and historical balances in the aggregate and went over some of the efforts undertaken.

VP Young lauded the efforts of AVP Kunz and her staff in addressing collections of student accounts receivable and developing initiatives that make it easier for students to meet their financial obligations. As a result, a significant decrease in collection balance amounts has been witnessed by the university.

Regent Acoba requested clarification on the role of the blue ribbon committee noted in the presentation; whether the Department of Taxation works with the university to address delinquent student account balances through a tax refund offset; and whether statutes governing debt collections pertinent to the university consider legal time limitations applicable to the collection of debt. VP Young replied that the blue ribbon committee was established to assess the academic mission of the university and how to make attending the university more agreeable to prospective students, including financial considerations and obligations. AVP Kunz added that a subcommittee within the blue ribbon committee was formed to discuss the issue of student debt collection and recommended a number of changes to the collections process, including improved student notification of balance due and the initiation of various payment options to meet a student's financial obligations. She also stated that the Department of Taxation offsets the tax refunds of students with delinquent accounts and remits these payments to the university. VP Okinaga stated that the statute of limitations applicable to the collection of debts does not affect the collection of monies by the university being discussed.

Citing the percentage fees charged by collection agencies for the services provided to the university, Regent Acoba asked if this was the major factor in deciding which collection agency to employ. AVP Kunz responded in the affirmative but stated that the university retains the option of utilizing any one of the four collection agencies.

Regent Wilson inquired about the impact of the COVID-19 pandemic on the collection of delinquent accounts. AVP Kunz replied that a substantial amount of the internal operations regarding debt collection of delinquent accounts, including the mailing out of collection letters, were completed prior to the economic shutdown in early 2020. Once the shutdown occurred and individuals began experiencing severe economic impacts because of the COVID-19 pandemic, the university halted collection efforts. However, these efforts were reinstated in late 2020. She noted that, despite the halt in collection efforts, students continued to take advantage of the repayment plans afforded by the university.

Regent Westerman asked if the Internal Revenue Service afforded an offset option for federal tax refunds. He also questioned whether federal stimulus money could be accessed by the university to help decrease student debt. AVP Kunz stated that she

was unaware of any opportunities for the university to establish tax liens on a student's federal tax refund. As for federal stimulus funding, money received by the university was disbursed directly to students in the form of student aid in accordance with Higher Education Emergency Relief Fund guidelines. Although the university encouraged students who received federal assistance to apply those funds to their outstanding educational debt, it could not require the use of the funds for that purpose.

#### **H. Review and Acceptance of Student Accounts Receivable Status of Corrective Action**

Internal Auditor Shizumura reported on the status of corrective actions taken by the university to address improvement opportunities and mitigate risks documented in a student accounts receivable report dated June 20, 2018. He stated that, while a substantial portion of the issues discovered and recommendations for corrective action were discussed under agenda item G, an issue not covered dealt with the labor-intensive process to reconcile information on student accounts receivable contained within the university's student information system with the Kuali Financial System (KFS), the university's general ledger. However, the administration has established a fully automated reconciliation system which has increased the efficiency and accuracy of this process. OIA has concluded that all recommended corrective actions have been implemented or are in the process of being implemented by the administration.

Regent Wilson moved to accept the report on the status of corrective action for student accounts receivable, seconded by Regent Acoba, and noting the excused absences of Vice-Chair Nahale-a and Regent Higaki, the motion carried, with all members present voting in the affirmative.

#### **I. Review and Acceptance of Review of University Bookstore System**

Internal Auditor Shizumura provided a summary of an initial audit of the University Bookstore System (Bookstore) stating that the audit examined various operational and financial aspects of the Bookstore. It was noted that all Bookstore accounting functions are the responsibility of the UHM Bookstore. He highlighted several associated risks and challenges facing the Bookstore that were identified in the audit including undetected and unreconciled financial information differences between the Bookstore's point-of-sale system and KFS; a lack of managing and monitoring inventory gross margins; the inability to identify and explain significant or unusual month-to-month and year-to-year financial account balance fluctuations; significant receivable balances (approximately \$1.6 million) as of June 30, 2020, in addition to the inability to provide a receivable report as of December 31, 2020; the inability to provide reports supporting inventory balances and adjustments; and the lack of documentation supporting the rental textbook program and the inability to adequately explain the program. OIA identified several recommendations to mitigate the above noted issues including that consideration be given to contracting Bookstore operations to a vendor specializing in managing higher education bookstores. OIA will provide a status of corrective action report to the committee in the future.

Chair Moore added that management's response to the audit report indicates that management concurs with the findings and recommendations of the audit and is in the process of implementing the majority of the suggested corrective actions.

Regent Acoba requested clarification on management's position regarding OIA's recommendation to outsource management of the Bookstores' operations. Chair Moore opined that OIA's recommendation was actually to consider outsourcing management of the Bookstore's operations and not require outsourcing. VP Gouveia replied that the administration has been investigating and analyzing this complex issue noting that challenges exist in balancing the needs of students and faculty with the process of Bookstore operations.

Regent Wilson asked about the university's stance regarding the provision of free textbooks, also known as open-sourcing, which is becoming more prevalent at institutions of higher education across the nation. President Lassner replied that open-sourcing initiatives tend to be more prevalent at the lower-division levels of institutes of higher education but become less so at the upper- and graduate-level divisions. As such, open-sourcing is viewed as being complimentary to, and not a replacement for, a bookstore. He also noted that in its efforts to provide reduced student educational costs through the provision of free or reduced-cost textbooks, universities were actually impairing their business models despite being the correct course of action.

Chair Moore questioned whether the requirement that 20 percent of sales at bookstores on the UHM, UHH, and Windward Community College campuses be paid to the Office of Hawaiian Affairs was applicable to gross or net sales of the respective bookstore. VP Okinaga replied that the university applies the 20 percent to net proceeds from agreed-upon sales categories that includes logo items but does not include textbooks and computers.

Regent Westerman stated that he believed that there would always be a need for a bookstore and that it was a matter of finding the right balance among meeting the needs of students, generating revenues, and mitigating expenses to maintain Bookstore operations.

Regent Acoba moved to accept OIA's review of the University Bookstore System and management's response to the review, seconded by Regent Wilson, and noting the excuses absences of Vice-Chair Nahale-a and Regent Higaki, the motion carried, with all members present voting in the affirmative.

#### **J. Review and Acceptance of Review of Real Property Lease Management**

Internal Auditor Shizumura provided a summary of an initial audit of the university's Office of Strategic Development and Partnership (OSDP) noting that it was established in 2019 to coordinate the strategic development and administration of university real property transactions. As a newly established university department, OSDP is in the process of revising university policies in addition to developing internal processes and procedures associated with the development and administration of real property transactions. One of the objectives of the audit was to evaluate OSDP operations, as

well as current processes and procedures it has been utilizing, to determine if the electronic records management repository platform known as OnBase that is used by OSDP to track real property transactions, including leases, was beneficial to the university's General Accounting Office (GAO) in connection with their implementation of the newly issued Governmental Accounting Standards Board Statement (GASB) No. 87 regarding leases. He highlighted several of OIA's recommendations, including enhancements to OnBase that will increase the accuracy and completeness of the lease listing thereby assisting GAO in remaining compliant with the provisions of GASB No. 87; having the office involved with a lease develop an abstract of the lease; and revising university policies and internal processes and procedures to better align with leading practices of offices similar to OSDP at other institutes of higher education. OIA will provide a status of corrective action report to the committee in the future.

Chair Moore remarked that management's response to the audit report indicates that it concurs with the findings and recommendations of the audit and is in the process of implementing the suggested corrective actions.

Regent Wilson moved to accept OIA's review of real property lease management, seconded by Regent Acoba, and noting the excuses absences of Vice-Chair Nahale-a and Regent Higaki, the motion carried, with all members present voting in the affirmative.

#### **K. Audit Project Status Update**

Internal Auditor Shizumura provided a status update on all of the projects and audits outlined in OIA's 2020-2021 work plan which was approved by the committee at its June 4, 2020, meeting and presented a chart indicating both completed and ongoing projects, as well as the noting the current stage of the ongoing projects.

#### **L. Whistleblower Report**

Internal Auditor Shizumura provided an overview of the whistleblower summary and tracking reports and reviewed some of the specific information contained within these reports noting that the primary type of whistleblower complaints being made continues to be cases involving employment or human resources-related issues.

Noting that public comment received by the committee noted alleged employer retaliation at HawCC, Chair Moore asked if this was something that would be appropriate to add to a whistleblower report. Internal Auditor Shizumura replied that OIA has received whistleblower reports regarding HawCC and noted that these reports have been forwarded to the community college system representative that evaluates whistleblower cases. It was his understanding that the community college system representative is continuing to investigate, evaluate, and analyze these cases and consultation with the community colleges systems office is ongoing.

#### **M. Enterprise Risk Management (ERM) Update**

VP Gouveia provided the annual ERM update noting that the administration continually assesses risk exposures to the university as part of its internal control

process and the committee's internal control program. She stated that, primarily as a result of the COVID-19 pandemic and the recently passed State budget, the top risk categories identified by the administration were financial resiliency and the maintenance of health and safety.

#### **N. Designation of Committee Member Financial Expertise**

Chair Moore state that Section 304A-321, HRS, requires that membership of the committee include one or more individuals with financial expertise. He noted that both he and Regent Wilson submitted statements highlighting the financial qualifications they possessed that would allow for their designation as the financial expert of the committee to the Board Office which were then distributed to committee members. Chair Moore opined that Board Chair Kudo also possesses financial qualifications, although he did not submit a statement.

Regent Acoba moved to designate both Chair Moore and Regent Wilson as the committee members with financial expertise as required by statute. Noting the excused absences of Vice-Chair Nahale-a and Regent Higaki and the appropriateness of either Chair Moore or Regent Wilson seconding the motion, Board Chair Kudo, as an ex officio voting member of the committee, seconded the motion. The motion passed with all members present, including Board Chair Kudo, voting in the affirmative.

#### **O. Committee Annual Review**

Chair Moore referenced the committee annual review matrix provided in the materials packet stating that it sets forth the actions carried out by the committee throughout the year and asked for comments from committee members. Hearing none, Chair Moore stated that it was a very productive year for the committee and thanked the committee members, administration, Board Office staff, university staff, and the internal and external auditors for all of their efforts that allowed the committee to complete the tasks set forth in the committee work plan.

Regent Acoba and Regent Wilson thanked Chair Moore for his leadership of the committee.

### **V. ADJOURNMENT**

There being no further business, Regent Wilson moved to adjourn, seconded by Regent Acoba, and noting the excused absences of Vice-Chair Nahale-a and Regent Higaki, and with all members present voting in the affirmative, the meeting was adjourned at 12:00 p.m.

Respectfully Submitted,

Kendra Oishi  
Executive Administrator and Secretary  
of the Board of Regents

**Committee on Independent Audit**  
Work Plan for the 2021-2022 Academic Year

	Committee duties per bylaws	2021-2022 Committee Goals and Objectives	Projected Timeline			
			1 <sup>st</sup> Q Jul-Sept	2 <sup>nd</sup> Q Oct-Dec	3 <sup>rd</sup> Q Jan-Mar	4 <sup>th</sup> Q Apr-Jun
1	Advise the Board regarding the Board's responsibilities to oversee:					
	(a) the quality and integrity of the University's compliance with legal, regulatory and policy requirements, financial reporting and financial statements, and internal controls related to risks;	Review and accept intercollegiate athletics audit reports for UHM		X		
		Review and accept Internal Control and Business Issues Report and corrective action responses			X	
	(b) the function, disclosures, and performance of the University's compliance, internal control, and risk management systems regarding ethics and compliance, risk, finance, and accounting, and the adequacy of such systems; and	Review and accept the annual report to the Legislature on Material Weaknesses and Fraud		X		
		Whistleblower report		X	X	X
		Enterprise Risk Management update		X	X	X
		Audit Project Status Update (~8/5/21)	X	X	X	X
		Designation of Committee Member Financial Expertise				X
		Office of Risk Management FY 2021 Annual Report		X		
		Review and accept UHH Athletics status of corrective action			X	
		Clery Act compliance audit			X	
		Public-Private Partnership (P3) policy compliance verification audit				X
		Gifts to the University audit				X
		Waikīkī Aquarium status of corrective action				X
		University Real Property Lease Management status of corrective action				X
		UH Bookstore status of corrective action				X

	Committee duties per bylaws	2021-2022 Committee Goals and Objectives	Projected Timeline			
			1 <sup>st</sup> Q Jul-Sept	2 <sup>nd</sup> Q Oct-Dec	3 <sup>rd</sup> Q Jan-Mar	4 <sup>th</sup> Q Apr-Jun
		UHM Warrior Recreation Center audit report		X		
		Vietnam Executive MBA audit report		X		
		Conflict of Interest Management audit report		X		
		Review and acceptance of status of corrective action report for check disbursements less than \$2,500		X		
		Review and acceptance of status of corrective action report on the implementation status of GASB No. 87 Leases		X		
		Review and acceptance of status of corrective action report on Maunakea			X	
	(c) the independent certified public accountant's qualification, independence and performance, as well as performance of the internal audit function.					
2	Review the annual internal audit plan and the extent to which it addresses high risk areas.	Approval of proposed Internal Audit Work Plan for 2022 – 2023				X
3	Review the annual report of the internal audit department and discuss significant issues of internal controls with the Internal Auditor and management.	Review and acceptance of draft Committee on Independent Audit Annual Report to the Board				X
4	Discuss the planned scope of the annual independent audit with the independent certified public accountants and review the results of the audit with the independent certified public accountants and management.	Accuity Required Communications – Planning Phase		X		

	Committee duties per bylaws	2021-2022 Committee Goals and Objectives	Projected Timeline			
			1 <sup>st</sup> Q Jul-Sept	2 <sup>nd</sup> Q Oct-Dec	3 <sup>rd</sup> Q Jan-Mar	4 <sup>th</sup> Q Apr-Jun
5	Receive and review the annual certified financial reports with the independent certified public accountants and management.	Review and acceptance of audited financial reports		X		
6	Recommend to the Board the certified public accountants to serve as the independent auditor, and their fees.	External auditor contract		X		
7	Revise the scope of the annual audit, and approve any services other than audit and audit related services provided by the certified public accountants.					
8	Provide recommendations to the Board regarding approval of the internal audit mission statement, the committee's charter, and other governance documents related to both internal and external compliance and auditing activities at the University.					X
9	<i>Committee Governance</i>	Review committee work plan (~8/5/21)	X			
		Review committee's work for the year				X
		Professional Development				
		Evaluation of the Internal Auditor			X	
		Discussion on Audit Plan Development and Effective Use of the Office of Internal Audit (~8/5/21)	X			
		Receive update on Office of Internal Audit Emergency Response Plan (~8/5/21)	X			

UNIVERSITY OF HAWAII  
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OFFICE OF INTERNAL AUDIT

Audit Plan Development  
*Committee on Independent Audit Meeting August 2021*

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For the Committee on Independent Audit of the Board of Regents  
*August 2021*



## **Purpose**

The University of Hawai'i (University) Board of Regents Committee on Independent Audit (Audit Committee) is currently assessing how to best utilize the Office of Internal Audit (Internal Audit). Accordingly, the purpose of this memorandum is to assist the Audit Committee in this assessment by providing a historical perspective of the identification process and description of audit projects performed by Internal Audit for the seven years ended June 30, 2022.

## **Audit Project Identification**

The audit projects included in the annual Audit Plan are developed using a risk-based approach that considers Internal Audit's available resources. The following is considered in the identification of audit projects included in the annual Audit Plan:

- Matters discussed at periodic Audit Committee meetings.
- Observations and findings contained in historical reports issued by Internal Audit. In addition, certain University departments and/or functions may be reviewed as a result of:
  - audit issues identified in connection with historical audit projects that warrant further analysis
  - audit issues noted in departments and/or functions with similar operations and/or
  - unremediated audit findings.
- Review of the various Internal Control and Business Issues Reports issued by the University's external auditors, Accuity LLP (Accuity).
- Meetings and discussions with Accuity with respect to sensitive audit areas.
- The risk dictionary published by the Association of College and University Auditors (ACUA), a professional organization comprised of audit practitioners in higher education,
- Audit plans of higher education institutions
- Regulatory compliance.

Executive Policy (EP) 8.204, *University Audits* states that the University's Vice President for Budget and Finance/Chief Financial Officer (CFO) serves as the University President's designee to work with Internal Audit in the planning and coordination of internal audits. Accordingly, the Director of Internal Audit provides a draft of the annual Audit Plan to the CFO for review and comment. The CFO provides the draft Audit Plan to the President prior to a meeting of the Director of Internal Audit, CFO and President to discuss the Audit Plan. Feedback from both the CFO and University President are incorporated into the Audit Plan prior to submission to the Audit Committee.

## **Other Higher Education Institution Audit Project Identification**

As described above, Internal Audit reviews the audit plans of other higher education institutions for purposes of identifying potential audit projects. In connection with this review, Internal Audit noted that other higher education institutions also follow a risk-based approach in identifying audit projects. The methods utilized in identifying risks for purposes of audit project identification included:

- Senior management input, interviews and surveys
- Enterprise Risk Management (ERM) analysis
- Peer institution audit plans
- National trends in higher education
- Professional judgement and knowledge gained from prior audit projects
- External auditor audit reports
- Financial significance of university campus/school/department (Unit).
- Time period since the Unit was last audited
- Ethics hotline



Internal Audit's process for identifying audit projects is consistent with the process noted in the Audit Plans reviewed of other higher education institutions. Although not specifically noted in Internal Audit's historical Audit Plans, the ERM analysis prepared by the University's Vice President of Administration and Whistleblower Hotline cases are considered in developing the Audit Plan. Audit projects generally do not result from these sources as actions to address matters identified in the ERM analysis or investigation of Whistleblower hotline cases are already in the process of mitigation by others within the University community, have already been addressed by a historical audit projects or is out of scope for Internal Audit.

### **Listing of Historical Audit Projects**

Accompanying this memorandum is a listing of audit projects (**Attachment I**) included in Audit Plans reviewed and approved by the Audit Committee during the seven years ending June 30, 2022. The first column describes the project with subsequent columns indicating the year (denoted with an "X") that the project was included in the Audit Plan. Several projects (H-Zone, ASUH) were recurring projects and accordingly have an "X" in several years. The projects are segregated by External Audit Assistance and Internal Audits. Internal Audits are further categorized as Audit Committee assistance, initial year audits and follow-up audits.

#### **A. Audit Committee Assistance**

Audit Committee assistance engagements consist of the following:

1. Whistleblower Hotline Program and related tracking reports
2. Annual Report to the Hawai'i State Legislature describing instances of material weaknesses or fraud
3. Audit Committee Annual Report to the University's Board of Regents (BOR) evaluating the effectiveness of the Audit Committee

The Director of Internal Audit prepares and presents whistleblower hotline reports at periodic Audit Committee meetings. The Annual Report to the Hawai'i State Legislature and Annual Report to the BOR are required pursuant to Hawai'i Revised Statutes §304A-321. Internal Audit prepares these Annual Reports on behalf of the Audit Committee.

#### **B. Initial year audits**

Criteria used in selecting initial year audits include auditing the operations of higher risk departments/units/functions. An area of audit emphasis has been revenue generating operations of the University. **Attachment I** list Audit Projects associated with revenue generating operations and included in Audit Plans for the seven years ending June 30, 2022. These Audit Projects are italicized and denoted with an asterisk ("\*").

The Audit Plan is a living document that is revised as conditions warrant. Flexibility is an inherently accepted part of the Audit Plan to accommodate audit requests from the Audit Committee and University management that may arise during the year. Accordingly, an Audit Plan approved by the Audit Committee may be subsequently supplemented with additional projects. These additional projects may be BOR requested or the result of University President and Senior Management consultation with the BOR (including the Audit Committee). All revisions to the approved Audit Plan require Audit Committee approval. The additional audit projects approved by the Audit Committee via an Audit Plan Supplement are listed and identified in **Attachment I**.



### **C. Follow-up audits**

Follow-up audits are generally performed during a year subsequent to the issuance of the report associated with an initial audit to evaluate management's actions in the implementation of corrective actions in response to the observations and recommendations of a historical initial year audit.

### **Audit Objectives**

Internal Audit designs audit project procedures to assess the following:

- Risks are appropriately identified and managed.
- Information is accurate, complete, reliable and timely.
- Employee actions comply with policies, standards, procedures and applicable laws and regulations.
- Operations are efficient and effective.
- Resources are acquired economically, used efficiently and adequately protected.
- Accountability systems are in place to ensure organizational and program missions, goals, plans and objectives are achieved.

### **Conclusion**

Internal Audit's process to identify audit projects included in the Audit Plan is consistent with the processes of other higher education institutions. Audit project feedback from both the Audit Committee and University Senior Management should ensure appropriate audit coverage of higher risk areas of the University. The various audit projects and audit services provided by Internal Audit is illustrated in **Attachment I**. The intent of this document was to provide the Audit Committee with information to assist their assessment in how to best utilize the services of Internal Audit.

**Office of Internal Audit**  
**Listing of Audit Projects per Audit Plan**  
**Seven years ended June 30, 2022**

Audit Project	2016	2017	2018	2019	2020	2021	2022
---------------	------	------	------	------	------	------	------

**External Audit Assistance**

Consolidated Financial Statements	X	X	X	(1)	X	X	X
Federal Compliance	X	X	X	(1)	X	X	X
UHM Athletics Financial Statements	X	N/A	N/A	N/A	N/A	N/A	N/A
NCAA AUP of UHM Athletics	X	X	X	(1)	X	X	X
NCAA AUP of UHH Athletics (required every 3rd yr)			X				

(1) Substantial Internal Audit resources were required to complete the Audit Committee requested Maunakea review during Fall 2018.

**Internal Audits**

**Audit Committee Assistance**

Whistleblower hotline	X	X	X	X	X	X	X
Audit Committee Report - MW Fraud	X	X	X	X	X	X	X
Audit Committee Report - AC Annual rpt	X	X	X	X	X	X	X

**Initial year audits**

**Audit Committee requested (approved via an Audit Plan supplement)**

* UHM Commuter Services	X						
* UHM - Student Housing	X						
* UHH - Student Housing	X						
Review of Maunakea			X				
UHWO - Review of KS Funded Programs					X		

**Financial audits and reviews**

* H-Zone Sales Audit and Management Letter	X	X					
UHM - ASUH Financial Statement review			X				

**Operational and Compliance audits**

UHM - Athletic Equipment and Apparel	X						
P-Card Program	X						
UHM - ASUH operational audits	X	X		X	X		
* University Press		X					
* CC - Revenue Generating Program policy review		X					
UHM - Outreach College		X					
Review of Student Fees for Professional Programs		X					
Capital Improvement Projects and R&M		X					
Travel Policy Compliance			X				
Review of Employee Cell Phone Charges			X				
Check Disbursements less than \$2,500			X				
Review of Students Accounts Receivable			X				
Review of Cash Receipts Process			X				

**Office of Internal Audit**  
**Listing of Audit Projects per Audit Plan**  
**Seven years ended June 30, 2022**

Audit Project	2016	2017	2018	2019	2020	2021	2022
Review of Sodexo Food Service Contracts				X			
* <i>University Bookstore</i>				X			
Review of Clearing Accounts				X			
* <i>Review of University Housing Program</i>					X		
GASB St 87					X		
Revenue Bond Compliance					X		
VEMBA					X		
* <i>Warrior Recreation Center</i>						X	
Real Property Leases						X	
* <i>Waikiki Aquarium</i>						X	
Conflict of Interest						X	
UHH Athletics							X
Clery Act compliance							X
Public-Private Partnership Compliance							X
Gifts to the University							X

**Follow - up audits (Status of Corrective Actions)**

* <i>H-Zone Sales Audit</i>	X	X					
* <i>KCC Culinary Arts Program</i>	X						
* <i>LCC Culinary Arts Program</i>	X						
UHM - ASUH		X	X	X	X		
P-Card Program		X					
KCC Chancellor Office Accts and UHF		X					
* <i>University Press</i>			X				
UHM Athletics Equipment and Apparel			X				
* <i>UHM Commuter Services</i>			X				
Travel Policy compliance				X			
Employee Cell Phone Charges				X			
Capital Improvement Projecta dn R&M				X			
UHM - Outreach College				X			
* <i>UHM Student Housing</i>				X			
* <i>UHH Student Housing</i>				X			
Evaluation of corrective action - C/D's less than \$2,500				X			
Review of Maunakea					X		
Student Fees for Professional Programs					X		
Cash Receipts Process					X		
Sodexo Food Service Contracts					X		
UHM ASUH						X	
Student Accts Receivable						X	
Clearing Accounts						X	
University Housing						X	

**Office of Internal Audit**  
**Listing of Audit Projects per Audit Plan**  
**Seven years ended June 30, 2022**

Audit Project	2016	2017	2018	2019	2020	2021	2022
GASB St 87						X	
Revenue Bond Compliance						X	
* <i>University Bookstore</i>							X
Real Property Leases							X
* <i>Waikiki Aquarium</i>							X

\* *Audit of a revenue generating operation*

# University of Hawai‘i Office of Internal Audit Emergency Response Plan

University of Hawai‘i (University) Department Information:

**Office of Internal Audit**  
**Makai Campus 15**  
**1465 Lower Campus Road**  
**Honolulu, Hawaii 96822**  
**Phone: 956-8945**

Contact Name:

**Glenn Shizumura, Director**  
**E-mail: gyshizu@hawaii.edu**  
**Office phone: 956-7318**  
**Cell phone: 780-8852**

Date of plan:

**April 2020**  
**July 2021 (revised)**

## **I. Mission and organization of the Office of Internal Audit**

The mission of the Office of Internal Audit (Internal Audit) is to assist the University’s Board of Regents (BOR) and University Management (President, Senior Management Team, Chancellors, etc.) fulfill their oversight, management, and operating responsibilities. This is accomplished through providing independent and objective assurance and consulting services conducted in a systematic and disciplined approach to evaluate, add value, and improve the University’s operations.

Internal Audit reports directly to the Committee on Independent Audit of the BOR and is supported administratively by the Vice President for Budget and Finance/Chief Financial Officer.

## **II. Purpose**

The purpose of this Emergency Response Plan is to document Internal Audit’s process in evaluating and implementing a response to a significant business disruption (emergency situation) including but not limited to the following:

- Severe weather (hurricane, flood, etc.)
- Fire
- Hazardous material spills
- Building/structure collapse
- Biological threats (pandemic/infectious/communicable disease)
- Terrorism
- Workplace violence
- Etc.

### **III. Process to evaluate and implement a response**

The following describes Internal Audit's process in evaluating and implementing a response to a business disruption. The response will vary depending upon the type and duration of the business disruption.

#### **A. Revisit Internal Audit's objectives**

The mission of Internal Audit is to assist the BOR and University Management in fulfilling their oversight, management, and operating responsibilities. Accordingly, business continuance is an objective which Internal Audit can perform both "in office" and "remotely".

##### **1) Effectiveness and efficiency of working remotely**

The nature of Internal Audit's work entails gathering, analyzing and evaluating audit evidence then preparing the associated report. Efficient and effective analysis and review of this audit evidence generally requires face to face meetings by Internal Audit staff (Director and staff auditors) as well as face to face meetings with auditee personnel. Preparation of the associated report requires significant collaboration amongst Internal Audit staff and is most effectively accomplished via face to face meetings. Working remotely, while possible is not preferable as it negatively impacts the efficiency and effectiveness of Internal Audit's work.

##### **2) Remote access to server is essential**

A substantial portion of Internal Audit's documents and working papers associated with its audit projects are stored on a computer server historically only accessible by Internal Audit staff while in the office. Working remotely for business continuance purposes requires readily available access to this computer server. With the assistance of personnel from the University's Information Technology Services department, Internal Audit is able to obtain remote access to this server in the event of a business disruption requiring Internal Audit staff to work remotely.

##### **3) Safety is a priority**

While business continuance is an objective, it is not a priority. The first priority is life safety. Accordingly, ensuring the safety of Internal Audit personnel is a top priority which may include such actions as evacuation, shelter-in-place, lockdown, etc.

#### **B. Identify employees that are "necessary and essential"**

Internal Audit personnel currently consist of the following:

- Director
- Three staff auditors
- One administrative assistant
- One student employee

##### **1) Director and staff auditors**

For purposes of meeting Internal Audit's business continuance objective, the Director and staff auditors are deemed "necessary and essential" employees. If required, the

Director and staff auditors have the ability to work remotely via an Internal Audit issued laptop computer or a computer owned by the auditor. However, working remotely will negatively impact Internal Audit's ability to complete its work efficiently and effectively due to the lack of face to face meetings.

2) Administrative assistant

The administrative assistant is also deemed "necessary and essential" but can primarily work remotely during a business disruption but must be available to return to Internal Audit with short notice. The primary duties of the administrative assistant are as follows:

- a. Provide information technology support.
- b. Manage the storage, back-up and security of Internal Audit's computer server.
- c. Maintain office supplies and equipment.
- d. Prepare and issue fiscal related documentation for procuring goods and processing payments.
- e. Coordinate work orders and auxiliary services for the office.
- f. Manage office information flow including the review and submission of student employee timesheets.

Duties a – c must be performed in office while duties d – f can be performed remotely. The administrative assistant also has the ability to work remotely with a computer owned by the administrative assistant.

3) Student employee(s)

Internal Audit employs University students majoring in accounting to provide the students with the opportunity to experience auditing from an internal audit perspective in addition to an external audit perspective. In addition to providing audit assistance to Internal Audit staff, student employees assist the administrative assistant with duties a - f. Student employees are **not** deemed "necessary and essential" and would not need to work in connection with a business disruption. In their absence, Internal Audit staff and the administrative assistant would perform the duties assigned to student employees.

C. Assess Internal Audit assets

Internal Audit's most significant asset after its personnel is its audit files. These audit files are maintained both electronically (on Internal Audit's computer server) and in hard copy. The contents of Internal Audit's computer server primarily consist of documents supporting Internal Audit projects (audit working papers), documents associated with the University's external audits (primarily audit reports, Internal Audit created working papers to support the external auditors), timesheets of Internal Audit personnel, and administrative files (supply inventory lists, student auditor tasks, student auditor presentations, etc.). Copies of the electronic files may also be maintained on Internal Audit staff assigned computers. The hard copy files are stored in a locked file cabinet and include a copy of the electronic files on a CD/DVD.

Audit working paper files associated with active audit projects are updated daily. Active audit projects are defined as audit projects that are currently undergoing audit procedures. Generally, three to five audit projects are deemed active during any work week. Historical audit projects for which the audit deliverable was issued are deemed archived. The audit working paper files associated with archived projects are not updated and revised. Administrative files (supply inventory lists, student auditor tasks, etc.) may be updated and revised monthly. External audit file information is revised in connection with the year-end University financial statement audit.

Given that frequent revisions generally only occur to a minimal number of electronic files coupled with multiple copies of these files stored on different media (Internal Audit staff computers, CD/DVD, e-mail attachments, hard copy documents, etc.), Internal Audit has determined that backup of the Internal Audit server on a weekly basis is sufficient to mitigate a significant disruption to operations. The weekly backup is conducted on two separate encrypted devices. One device is held on-site and stored in a portable fire and waterproof safe that is kept in a locked file cabinet. The other device is held by the Director to conform with off-site recommended storage practices.

All computers have University required anti-malware software installed and updated. Laptops are secured in a locked file cabinet. All Internal Audit computers are password protected.

Internal Audit's maintains minimal office supplies and re-orders inventory in connection with our periodic inventory counts. Inadequate office supplies would not be an issue as a result of a business disruption.

D. Coordinate with emergency services personnel

Internal Audit will adhere to University instructions regarding the actions to be taken in the event of a business disruption such as evacuation, shelter-in-place, etc. In the event of an evacuation, there are no logistical problems for disabled individuals as the building housing Internal Audit includes wheelchair ramps. Internal Audit can easily secure all doors and has minimal glass windows such that a lockdown or sheltering-in-place would pose no issues.

E. Other issues

Operational and financial impacts to Internal Audit resulting from a business disruption include the following:

1) Financial

A short-term (several days to a few weeks) business disruption will have minimal financial impact. Full-time staff would remain intact with the possibility of furloughing student employees. A long-term (excess of one month) business disruption may have significant financial impact if accompanied with a decrease in State of Hawai'i funding. Funding decreases may result in a decrease (or elimination) of student employees, reduction of purchases (unless absolutely necessary) of office

supplies and computer equipment and the non-renewal of Internal Audit's electronic subscription to accounting/auditing reference materials.

Internal Audit's staff auditors and administrative assistant are HGEA Bargaining Unit 8 employees. Accordingly, consultation with HGEA would be required with respect to any pay cuts or layoffs. If layoffs are required, the Director will make that determination taking into consideration job function, performance and seniority.

2) Insurance

Internal Audit's office and equipment are insured by the University's property coverages (self-insurance reserves, University insurance policy then State of Hawai'i policy). As previously noted, Internal Audit's most significant and important asset is their personnel.

3) Communication

A business disruption will have minimal impact to communication. All Internal Audit personnel can communicate via their personal cell phones (voice or text) or through e-mail. However and as noted previously, face to face communication is preferable. Accordingly, the lack of face to face communication may negatively impact Internal Audit's ability to efficiently and effectively complete audit projects.

F. Recovery strategy

Internal Audit has planned for the possible damage to its computer server (fire, severe weather, etc.) with multiple external back up portable hard drives. Accordingly, should damage to the computer server occur, Internal Audit could resume operations within a day by downloading information from the back up hard drives to a new/different computer server.

#### **IV. Assessment**

As described in the prior section, Internal Audit has the capability to continue its operations either "in office" or "remotely" in response to a business disruption. A long term business disruption lasting several months may create financial issues resulting in employee layoffs and other cost cutting measures. However, Internal Audit would still be able to continue to operate in order to meet its objectives.

In the event of a business disruption, a separate memorandum will be prepared describing Internal Audit's planned actions in response to the business disruption. The response must consider the type and duration of the business disruption as well as guidance provided by University leadership.

#### **V. Operations during a business disruption**

The Director would be in constant and continuous contact with staff auditors and administrative assistant through e-mails, phone calls and text message. A daily conference call and periodic video conferencing will be scheduled. The Director will also be in contact with the Board Secretary during these business disruptions.

**Office of Internal Audit**  
**Audit Project Status**  
**As of July 29, 2021**

Project Description	Audit Phase									Comments
	Preliminary review	Notification and initial meeting	Planning	Fieldwork	Report drafting	Auditee reviewing draft report	Mngmt preparing response	Rpt distribution to the AC	AC reviewed and accepted rpt	
<b>External Audit Assistance</b>										
1 Financial stmts, compliance, NCAA AUP										Assistance not yet commenced.
<b>Audit Committee Assistance</b>										
2 Whistleblower hotline										Hotline monitored continuously. Rpts presented at periodic AC mtgs.
3 Audit Committee Report - MW Fraud										To be presented at the 12/2021 AC mtg.
4 Audit Committee Report - AC Annual rpt										To be presented at the 6/2022 AC meeting.
<b>Audits</b>										
<b>Carryover</b>										
5 Vietnam Executive MBA program										Revising draft rpt pursuant to Shidler comments and receipt of addtl info in 7/2021.
6 Warrior Recreation Center										Mtg scheduled for 8/4/21 to discuss draft distributed on 5/27/21.
7 Conflict of Interest										IA is completing audit procedures and drafting rpt.
<b>New</b>										
8 UHH - Athletics										Information received from Accuity. Work to commence in 08/2021.
9 Clery Act compliance										Preliminary discussions completed. Work to commence in 08/2021.
10 Public Private Partnership compliance										Time of performance 11/2021-03/2022
11 Gifts to the University										Time of performance 01/2022-03/2022
<b>Corrective Action Status</b>										
12 Check disb. less than \$2,500										To be presented at the 08/05/21 AC meeting.
13 Maunakea										Management update pending.
14 GASB St 87										Revised draft report distributed 7/13/21. FMO finalizing implementation plan.
15 Waikiki Aquarium										Time of performance 01/2022-05/2022
16 Real Property Leases										Time of performance 01/2022-05/2022
17 University Bookstore										Time of performance 01/2022-05/2022
18 Vietnam Executive MBA program										Time of performance 01/2022-05/2022