

**MINNESOTA STATE COLLEGES AND UNIVERSITIES
BOARD OF TRUSTEES**

Agenda Item Summary Sheet

Name: Audit Committee

Date: November 17, 2015

Title: Clery Act Internal Control and Compliance Audit

Purpose (check one):

Proposed
New Policy or
Amendment to
Existing Policy

Approvals
Required by
Policy

Other
Approvals

Monitoring /
Compliance

Information

Brief Description:

As part of the Fiscal Year 2015 Internal Auditing Annual Audit Plan, the Office of Internal Auditing conducted a Clery Act internal control and compliance audit.

The results of the audit will be presented and discussed at the November 17, 2015 committee meeting.

Scheduled Presenter(s):

Eric Wion, Deputy Director, Office of Internal Auditing
Melissa Primus, Project Manager, Office of Internal Auditing

**BOARD OF TRUSTEES
MINNESOTA STATE COLLEGES AND UNIVERSITIES**

BOARD INFORMATION

CLERY ACT INTERNAL CONTROL AND COMPLIANCE AUDIT

Background:

The Clery Act Internal Control and Compliance audit was approved by the audit committee as part of the Fiscal Year 2015 Internal Auditing Annual Audit Plan, and was completed in fiscal year 2016.

The results of the Clery Act Internal Control and Compliance audit were released on September 8, 2015. Audit committee members received a copy of the audit at that time. Additional copies of the audit may be obtained from the Office of Internal Auditing by request.

Attached is the Clery Act Internal Control and Compliance audit executive summary.

Date Presented to the Board of Trustees: November 18, 2015



Minnesota
STATE COLLEGES
& UNIVERSITIES

Clery Act Internal Control and Compliance Audit

Office of Internal Auditing
Reference Number 2015-08

Public Release Date – September 8, 2015

Members of the MnSCU Board of Trustees
Chancellor Steven J. Rosenstone
College and University Presidents

In June 2014, the Board approved the system audit of the Clery Act. This report presents the results of the audit. It contains six findings and recommendations to assist colleges, universities, and the system office in improving processes, controls, and compliance.

We conducted this audit in conformance with the *International Standards for the Professional Practice of Internal Auditing*.

The results of the audit were discussed with the system office and college and university staff for the ten institutions included in our review on July 30, 2015.

We appreciate the excellent cooperation and assistance that we received from employees at the colleges, universities, and system office.

Beth Buse, CPA, CIA, CISA
Executive Director

Executive Summary

Background:

- Clery Act requires colleges and universities to disclose information about crime on and around their campuses.
- Colleges and universities must comply with Clery requirements to receive federal financial aid.
- Compliance with the Clery requirements can be complex.
- Each institution is responsible for developing processes and procedures to comply with the requirements.

Conclusion:

Colleges and universities were aware of Clery requirements, fully understood the importance of complying with the requirements, and had procedures in place to collect and report crime data. We did, however, identify some internal control deficiencies and examples of non-compliance.

Findings

- Six institutions did not properly identify Clery geography for campus and non-campus sites and 10 institutions may not have obtained crime data from some law enforcement agencies.
- Some institutions did not provide training to new campus security authorities (CSAs) or refresher training to remind CSAs of their responsibilities and one institution did not properly identify all CSAs.
- Five institutions did not properly maintain and allow access to crime or fire logs.
- Four institutions did not address new requirements related to Violence Against Women Reauthorization Act (VAWA) legislation.
- Nine annual security reports were missing required policy statements or other required information.
- Seven institutions did not provide sufficient notification about the availability of the report to students and employees.

Long Term Consideration for System Leaders

- College, university, and system leaders should consider how the Clery support team can help institutions address audit findings.

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*The audit was performed by Carolyn Gabel, Marita Hickman,
Kim McLaughlin, Indra Mohabir, and Melissa Primus*