



**Office of  
Internal Audit**

FLORIDA INTERNATIONAL UNIVERSITY

**Audit of the CARES Act  
Institutional Relief Funds  
Report No. 20/21-07  
March 31, 2021**



## Office of Internal Audit

**Date:** March 31, 2021

**To:** Aime Martinez, Associate Vice President of Business and Finance

**From:** Trevor L. Williams, Chief Audit Executive

A handwritten signature in blue ink, reading "Trevor L. Williams", is placed over the printed name of the Chief Audit Executive.

**Subject: Audit of the CARES Act Institutional Relief Funds – Report No. 20/21-07**

We have completed an audit of the Coronavirus Aid, Relief, and Economic Security (CARES) Act Institutional Relief Funds for the period April 1, 2020, through December 31, 2020. The objective of the audit was to determine whether the established controls for the use of CARES funds were: a) adequate and effective; b) being adhered to; and c) compliant with the requirements of the CARES Act, the guidance provided by the U.S. Department of Education (USDOE), and University policies and procedures.

Specifically, we ensured: (a) the establishment of a clear nexus between the allowable reimbursement and significant changes to the delivery of instruction due to coronavirus; (b) the confirmation that student refunds (e.g., room and board, meals, and other fees), technology (e.g., laptops, hotspots) purchased for students, and other allowable costs originated on or after March 13, 2020; and (c) the assurance that funds were not used for endowments, athletic or religious facilities, and enrollment recruitment activities such as marketing and advertising.

The University refunded students approximately \$3.4 million for unused housing expenses and \$813,200 for unused meal plans through the CARES Act Institutional Relief Funds. Additionally, the University used \$3.5 million on other coronavirus-related expenses related to information technology, personal protective equipment, payroll, testing lab, contact tracing, and cleaning supplies.

Overall, our audit found that there were adequate procedures and controls in place over FIU's use of the CARES Act Institutional Relief Funds to ensure compliance with the CARES Act, USDOE guidance, and University policies and procedures. In addition, we have concluded that the amounts determined for reimbursable costs from the USDOE were fairly calculated, in all material respects.

We want to take this opportunity to express our appreciation to you and your staff for the cooperation and courtesies extended to us during the audit.

Attachment

C: FIU Board of Trustees

Mark B. Rosenberg, University President

Kenneth G. Furton, Provost, Executive Vice President, and Chief Operating Officer

Kenneth A. Jessell, Senior Vice President and Chief Financial Officer

Javier I. Marques, Vice President and Chief of Staff, Office of the President

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## **OBJECTIVES, SCOPE, AND METHODOLOGY**

Pursuant to the approved annual plan for the 2020-2021 fiscal year, we have completed an audit of the Coronavirus Aid, Relief, and Economic Security (CARES) Act Institutional Relief Funds for the period April 1, 2020, through December 31, 2020. The objectives of our audit were to determine whether the University was compliant with the requirements of the CARES Act and the guidance provided by the U.S. Department of Education (USDOE) as it pertained to: (a) the establishment of a clear nexus between the allowable reimbursement and significant changes to the delivery of instruction due to coronavirus; (b) the confirmation that student refunds (e.g., room and board, meals, and other fees), technology (e.g., laptops, hotspots) purchased for students, and other allowable costs originated on or after March 13, 2020; and (c) the assurance that funds were not used for endowments, athletic or religious facilities, and enrollment recruitment activities such as marketing and advertising.

The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*, promulgated by The Institute of Internal Auditors. The audit included tests of the accounting and student records and such other auditing procedures, as we considered necessary under the circumstances. Audit fieldwork was conducted from October 2020 through February 2021.



During the audit, we:

- Reviewed the CARES Act, the USDOE's CARES Act guidance, the Board of Governors' CARES Act Compliance Guidance, and the University's CARES Act Reimbursement Guidelines;
- Reviewed the Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards;
- Evaluated the established controls and procedures over the refunding process;
- Interviewed responsible personnel;
- Tested student's total housing and meal plan refund calculations using data analytics to analyze the entire population and identify anomalies;
- Verified selected student's data used in calculations against PantherSoft data;
- Reviewed supporting documentation; and
- Tested selected other expenses for eligibility and propriety.

Sample sizes selected for testing were determined on a judgmental basis applying a non-statistical sampling methodology.

As part of our audit, we reviewed our report, Audit of COVID-19 Student Financial Assistance Program, Report No. 20/21-03, to determine whether there were any prior recommendations related to the scope and objectives of this audit and concluded the recommendations therein do not relate to the Institutional Relief Funds being audited.

## **BACKGROUND**

The CARES Act Institutional Relief Funds originated after The United States Congress (“Congress”) passed The Coronavirus Aid, Relief, and Economic Security (CARES) Act (“H.R. 748”) and the U.S. President signed into law on March 27, 2020. Section 18004(a)(1) of the CARES Act awarded approximately \$14 billion in assistance to higher education institutions through the Higher Education Emergency Relief Fund (HEERF).

The assistance to institutions of higher education under section 18004(a)(1) consisted of two parts: one part or the equivalent of no less than 50 percent was intended for emergency financial aid to students (Student Aid Portion) and the remaining part was to aid institutions to cover costs related to significant changes in the delivery of instruction due to the coronavirus (Institutional Portion). This audit of the CARES Act Institutional Relief Funds concentrates only on the Institutional Portion of section 18004(a)(1).



Congress appointed the U.S. Secretary of Education to distribute the Institutional Portion of the emergency funds as a cost reimbursable grant. The amount each institution was allocated depended on the relative share of full-time enrolled students who were not exclusively enrolled in distance education courses. However, even though the student’s enrollment in distance learning courses was a factor in determining their eligibility for emergency financial assistance, including tuition reimbursement, this was not a factor for refunding students for housing or meal plans.

The USDOE granted the University \$38,301,957 of which FIU determined it would allocate \$19,150,978, (50 percent) of the total funds awarded, as the HEERF Institutional Portion used to cover costs related to significant changes in the delivery of instruction due to the coronavirus. According to the HEERF Agreement and Certification signed by FIU, the University retained the discretion in determining how to allocate and use the funds awarded if the costs had a clear nexus to significant changes to the delivery of instruction due to the coronavirus. The agreement allows the University to reimburse itself for costs related to refunds made to students for the following:

- Housing
- Meal Plans
- Hardware, software, or internet connectivity purchased on behalf of the students or provided to the students
- Other services that the University could no longer provide

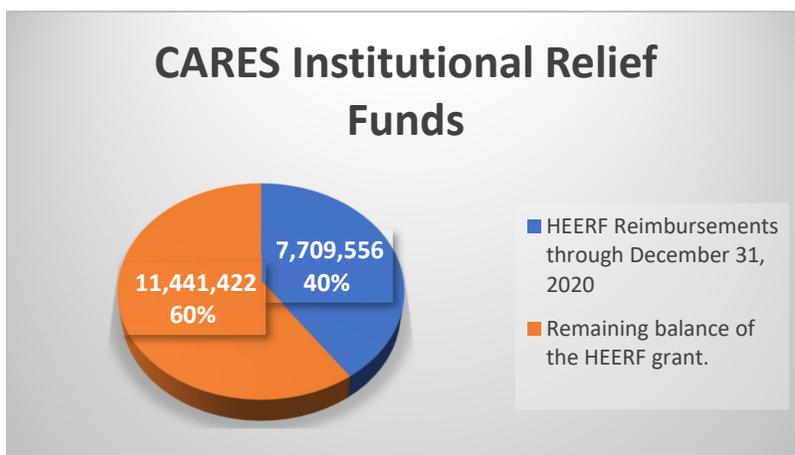
Since the HEERF Institutional Portion of the funds was awarded as a cost reimbursable grant, as expenses and costs were incurred by the University, they would be drawn down from the HEERF funds. The Office of Research and Economic Development (ORED) was responsible for drawing down the funds for transactions that were posted to the corresponding project IDs via the USDOE's Grants Management System ("G5").

The University created the following 13 projects to track and classify all the allowable expenses under specific categories:

<b>Table 1 – CARES Projects and Expenditures through December 31, 2020</b>	
<b>Project Name</b>	<b>Amount</b>
Housing Refunds	\$ 3,349,718
Remote Learning and Technology	1,603,343
Facilities: Cleaning and PPE	972,709
Meal Plan Refunds	813,172
FIU COVID-19 Testing Lab	254,880
Student Technology Hardware & Fees	227,373
Cleaning and PPE - University Departments	173,733
Facilities: Minor Project	113,309
FIU HyFlex Instructional Design	81,112
COVID-19 Contact Tracing Response	68,295
On-Campus Social Distancing	26,486
High-speed Internet - Remote Learning [AT&T]	20,141
CARES Act Main Project	5,285
<b>Total</b>	<b>\$ 7,709,556</b>

Source: PantherSoft TranData and December 31, 2020, Quarterly Report

The University has spent \$7.7 million out of the \$19.2 million HEERF funds granted by the USDOE in allowable costs between April 1, 2020, and December 31, 2020. The remaining balance, \$11.4 million, was to be utilized by May 3, 2021, the anniversary of the grant award notification (GAN). With the subsequent signing of the Coronavirus Response and Relief

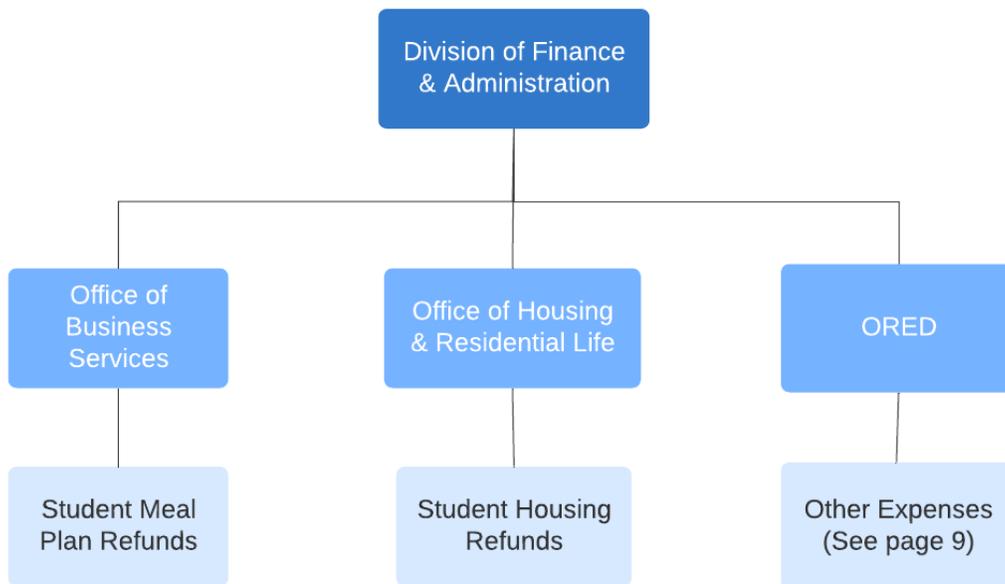


Supplemental Appropriations Act (CRRSAA)—also known as HEERF II—on December 27, 2020, the University was allocated an additional \$70,899,027, with a maximum of \$51,748,049 being allocated as the Institutional Portion. The CRRSAA requires

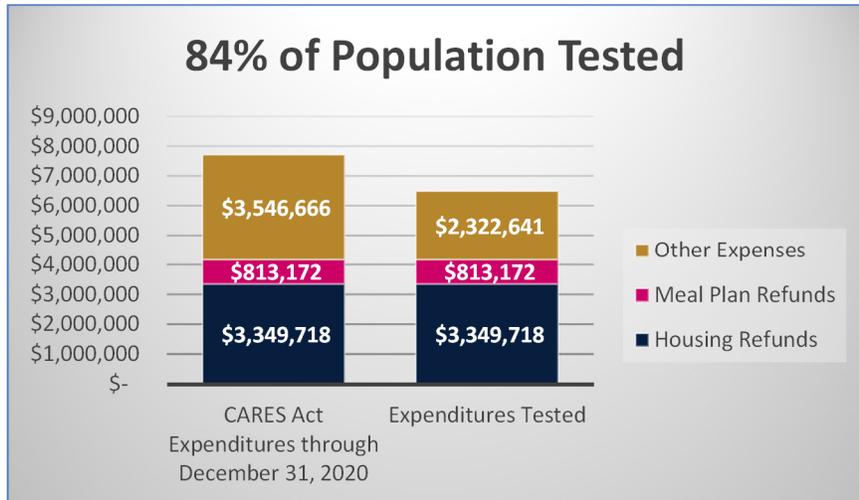
institutions to spend the same dollar amount on student aid grants as they were required to spend under the CARES Act from their total allocation. For FIU, that amount is \$19,150,978. Pursuant to amended USDOE guidance emanating from the passage of the CRRSAA, the period to expend the \$11.4 million has been extended beyond the original expiration date of May 3, 2021. According to the amended guidance, institutions generally must expend their HEERF funds within one year from the date when the USDOE processed the most recent obligation of funds for each specific grant. Thus, institutions that received a supplemental award under CRRSAA have one year to spend all remaining CARES funds and new CRRSAA funds for each grant. The most current GAN reflects a budget period ending January 13, 2022. If the funds are not used by the end of the budget period, a no-cost extension must be filed in order to receive an additional 12 months to utilize the funds. Subsequently, the American Rescue Plan Act of 2021, signed into law on March 11, 2021, allocated approximately \$40 billion additional supplemental relief funds (HEERF III) to institutions of higher education. The allocations of HEERF III funds to individual institutions have yet to be determined as of the date of this report.

The task of overseeing students' refunds for housing and meal plans was assigned to the Office of Housing and Residential Life and to the Office of Business Services. These offices oversaw the calculations and initiated the student refund process. All other expenses requested for CARES reimbursement were managed by the Division of Finance and Administration, which oversaw the departmental applications, expenditure reviews, and the reimbursement process, with ORED reviewing for CARES Act compliance and grant requirements.

### **CARES Act Expense Management Chart**



Our audit tested all Housing and Meal Plan refunds, which accounted for \$4,162,890 (54%) of all CARES expenditures, and \$2,322,641 (65%) of the \$3,546,666 Other Expenses. Thus, our audit tested 84% of all CARES expenditures, through December 31, 2020.



### Compliance with CARES Act and the U.S. Department of Education Requirements

The U.S. Department of Education required the University to sign and submit a Certificate of Funding and Agreement prior to receiving the funds. This agreement established the terms and conditions for the funding. Specifically:

- Up to 50 percent of the funds are to cover costs related to significant changes in the delivery of instruction due to the coronavirus. The remaining 50 percent or more, depending on the allocation percentage, of the funds are used to provide student financial assistance grants.
- Grants are to be used to cover costs that have a clear nexus to significant changes to the delivery of instruction due to the coronavirus.
- Grants are **not** to be used for payment to contractors for the provision of pre-enrollment recruitment activities, which include marketing and advertising; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship.
- Costs must have been first incurred on or after March 13, 2020.
- Quarterly reports are to be submitted to the U.S. Secretary of Education.



## **Calculation and Distribution of Housing Refunds**

On March 17, 2020, the State University System (SUS) instructed all state universities to develop a plan to provide refunds, rebates, and/or credits to students who may no longer be able to utilize their university residence hall contracts.

The University complied and developed the following plan:

- For students who checked out of the dormitories before March 15, 2020, prorate the refund from March 16, 2020.
- For students who checked out of the dormitories on or between March 16 and 22, 2020, prorate the refund from March 23, 2020.
- For students who checked out of the dormitories on or after March 23, 2020, prorate the refund based on the actual check out date.

The Office of Housing and Residential Life relied on its Mercury platform to record the check-out date for students housed at the Modesto Maidique Campus (MMC) and the system used by Servitas Management Group, LLC for students housed at the Biscayne Bay Campus (BBC). The Bayview Housing at BBC is a private, student housing not owned or operated by



FIU. The dormitories are part of a public-private partnership (“P3”) between FIU and NCCD - Biscayne Properties, LLC and are managed by Servitas Management Group, LLC. According to the P3 agreement, the building will revert to University ownership at year 40. The University concluded that because of the P3 agreement, the fact that FIU collected dormitory fees on behalf of Servitas Management Group, LLC, and had asked the students to leave the dormitories, the Bayview students were afforded the same treatment as MMC students.

Once the student housing logs were reviewed, the Office of Housing and Residential Life prepared a spreadsheet calculating the prorated amounts for the remainder of the rental period. The prorations were issued as credits to each student’s semester housing charge. Students only received a cash refund if they had paid beyond the balance due after the credit was issued.

## **Calculation and Distribution of Meal Plan Refunds**

As a result of the SUS' request that universities develop a plan to provide refunds, rebates, and/or credits to students who may no longer be able to utilize their university dining plan contracts, the University complied and developed the following plan:

For Meal Plans (Unlimited, Weekly, and Blocks of Meals) –

- Commuter students were refunded as of the latter of March 12, 2020, or the date of last use, through the remainder of the semester.
- Housing students were refunded as of the latter of the day following their check out date or the date of last use, through the remainder of the semester.

For Dining Dollars –

- All students were refunded the full value of the remaining balance of dining dollars associated with their meal plans from the 2019 fall carryover and 2020 spring meal plans.

The University has an agreement with Chartwells (a division of Compass Group U.S.A, Inc.) to provide dining services on campus. Students can purchase meal plans through FIU or directly from Chartwells. All meal plan fees collected by FIU are transferred to Chartwells in exchange for a 10.5 percent commission once the student uses the meal plan. Chartwells keeps track of each student's meal usage through the *One Card*, which is the University



ID card students swipe at the register. Chartwells offers unlimited, weekly, and block meal plans. In addition, some meal plans include a set amount of dining dollars that offer the students the equivalent of cash that can be used however the student chooses at different dining locations.

Prior to the coronavirus pandemic, the meal plan process was as follows:

1. Student purchases Meal Plan from the University or directly from Chartwells.
2. Payment is applied against the student's Meal Plan balance.
3. FIU transfers to Chartwells the Meal Plan funds, net of any uncollected balance.

4. When the student purchases his/her meals or the time to purchase the meal expires, Chartwells pays a 10.5 percent commission to the University on a monthly basis.
5. Before year-end, any student's uncollected balance is transferred to Chartwells for them to pursue collection.

As a result of the impact from COVID-19, the meal plan process was changed. On or around April 2020, FIU transferred the meal plan funds received to Chartwells, net of any uncollected balance, and then refunded the students based on the distribution plan established. Later, the student refunds were reimbursed from the USDOE. FIU also covered Chartwells' uncollected student balance of \$38,703 using Auxiliary funds and in return Chartwells closed its books and paid FIU the 10.5 percent commission.

The change stemmed from a Memorandum of Understanding (MOU) signed on May 8, 2020, between the University and Chartwells, where Chartwells would continue to remain operational to serve residential students who could not leave campus as well as those infected with coronavirus. In return, FIU, at its own expense, would refund the remaining balance of the meal plans to the students on behalf of Chartwells and would not seek reimbursement from Chartwells. Additionally, FIU would cover the bad debt costs and waive collection of the minimum guaranteed payment from Chartwells for the fiscal year ending June 30, 2020. When we inquired of Management regarding the MOU, they stated the following:



“The MOU was a win-win arrangement that benefitted both parties and minimized risk to FIU. FIU never ceased operations and continued to meet the needs of faculty, staff and students that remained on campus, despite the very few patrons being served, making it challenging to break-even. This continuation occurred during a time when other dining locations surrounding the University shut down. In addition, FIU ensured that students who were infected with COVID were safely served meals in a quarantined situation, which gave parents a big sense of comfort and relief of worry. Had this agreement not been met, the University was being asked to amend the agreement to a cost recovery model. This model to operate through the end of July would have cost FIU in excess of what the refunds and bad debt expense ended up being.”

The Office of Business Services reviewed and prepared a spreadsheet with all the students with meal plan balances. The prorrations were issued as credits to each student's meal plan charge. Students only received a cash refund if they had paid beyond the balance due after the credit was issued.

## Other Expenses Claimed under the CARES Act

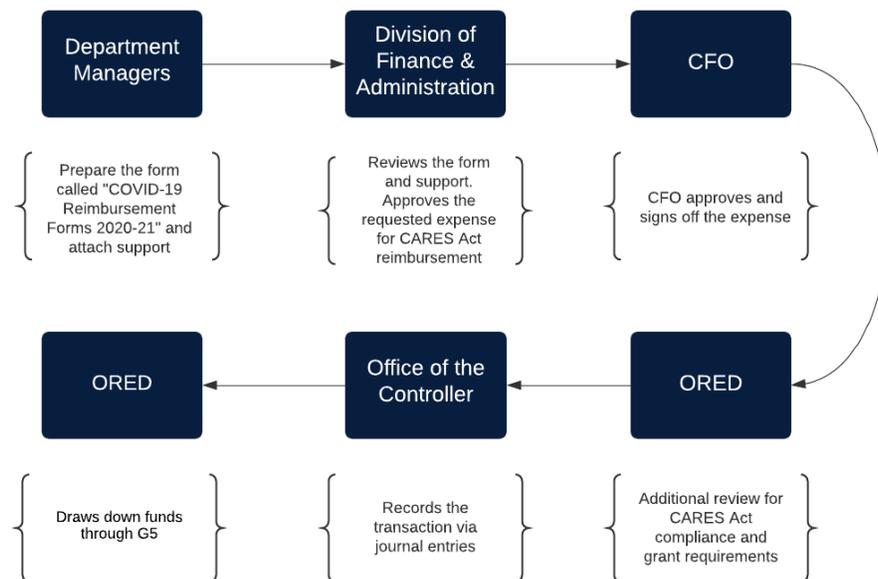
The University has used the remaining funds to pay for the following:

- Personal protective equipment (PPE) for the students, faculty, and staff;
- Cleaning supplies;
- Barriers and plexiglass dividers to safely distance students, faculty, and staff;
- Remote learning and technology;
- High speed internet, hardware, and software;
- Payroll for temporary staff and work related to significant changes due to COVID-19;
- COVID-19 Lab and lab supplies; and
- Contact tracing response, among others.



The University created sub-projects to handle specific expenses for Facilities, Payroll, Testing Lab, and Information Technology related expenditures. The sub-projects were approved by the CFO, while the expenditures (\$1,490,305) were approved and managed by the managers of the sub-project. However, other expenses being refunded or transferred for reimbursement outside these sub-projects (\$2,056,361) had to be approved individually prior to being submitted for CARES reimbursement. The diagram below depicts the process flow of the reimbursement cycle for CARES Act eligible Other Expenses.

**Other Expenses - Reimbursement Cycle**



According to the CARES Act, the expense must have been incurred on or after March 13, 2020, which was the day the Coronavirus pandemic was declared a national emergency. Also, the expense should have followed the purchasing procedures established by the University. However, on March 15, 2020, the President signed an Emergency Declaration – Waiver of Competitive Solicitation Requirements, which allowed the University to waive the bidding section of the procedures.

## OBSERVATIONS

Overall, based on the auditing procedures performed, our audit concluded that the University's use of the Institutional Portion of the CARES Act HEERF awards under section 18004(a)(1) complied with the requirements of the Act and the amounts determined for reimbursable costs were fairly calculated, in all material respects. In addition, overall, we have assessed the internal control over the operations satisfactory, as presented in the table below.

CRITERIA	SATISFACTORY	OPPORTUNITIES TO IMPROVE	INADEQUATE
<b>Process Controls</b>	X		
<b>Policy &amp; Procedures Compliance</b>	X		
<b>Effect</b>	X		
<b>Information Risk</b>	X		
<b>External Risk</b>	X		
INTERNAL CONTROLS LEGEND			
CRITERIA	SATISFACTORY	OPPORTUNITIES TO IMPROVE	INADEQUATE
<b>Process Controls</b> (Activities established mainly through policies and procedures to ensure that risks are mitigated, and objectives are achieved.)	Effective	Opportunities exist to improve effectiveness	Do not exist or are not reliable
<b>Policy &amp; Procedures Compliance</b> (The degree of compliance with process controls – policies and procedures.)	Non-compliance issues are minor	Non-compliance issues may be systematic	Non-compliance issues are pervasive, significant, or have severe consequences
<b>Effect</b> (The potential negative impact to the operations- financial, reputational, social, etc.)	Not likely to impact operations or program outcomes	Impact on outcomes contained	Negative impact on outcomes
<b>Information Risk</b> (The risk that information upon which a business decision is made is inaccurate.)	Information systems are reliable	Data systems are mostly accurate but need to be improved	Systems produce incomplete or inaccurate data which may cause inappropriate financial and operational decisions
<b>External Risk</b> (Risks arising from events outside of the organization's control; e.g., political, legal, social, cybersecurity, economic, environment.)	None or low	Potential for damage	Severe risk of damage

## **1. Compliance with CARES Act and the U.S. Department of Education Requirements**

The University signed and submitted the CARES HEERF Certification and Agreement on April 21, 2020. Following the rules established by Congress, no more than 50 percent of the funds (\$19,150,978) were allocated to cover institutional costs related to significant changes in the delivery of instruction due to the coronavirus. Records show that the University timely filed the required quarterly reports with the USDOE on October 30, 2020, and January 10, 2021. The University fully complied with the requirements and guidance established by Congress and the USDOE pertaining to the allocation of funds and filing of reports.

## **2. Other Expenses Claimed under the CARES Act**

We randomly selected a sample of 35 expense transactions claimed for reimbursement under the CARES Act totaling \$2,322,641 (65 percent of all Other Expenses) to test for eligibility, proper approvals by management, and meeting purchasing guidelines, among others. There were no exceptions found in the 35 transactions tested.

## **3. Calculation and Distribution of Student Refunds**

In performing an audit, we may discover situations that are either material or significant in the context of the audit objectives or are systemic. Our audit did not uncover any matter that met those criteria when testing student refunds. An audit may also discover situations that are either insignificant in the context of the audit objectives or are non-systemic. Our audit found instances that clearly represented errors in the calculation of amounts refunded but do not appear to be systemic conditions due to their nature and/or frequency. Most commonly, these situations involved isolated, human error that are not necessarily indicative of a systemic weakness in the University's operations of managing CARES Act funds. In addition, when notified of these non-systemic conditions, management immediately took corrective action.

The following summarizes these conditions and provide the context in relation to the funds audited:

### **Housing Refund Calculations**

We reviewed and analyzed the Master File consisting of 3,037 students who received housing refunds totaling \$3,349,718 of prorated amounts for the remainder of the rental period. Using the data available and recalculating 100 percent of the refunds, we found no material errors. Specifically, our test found 36 instances of students with erroneous calculations out of 3,037 students, representing an error rate of 1.19%. The total absolute and net

values, \$8,516 (0.25%) and (\$6,414) (-0.19%), respectively, related to these instances were similarly insignificant. (Refer to Appendix I for the test results of housing refunds.) Moreover, the causes for these errors were deemed to be non-systemic.

### **Meal Plan Refund Calculations**

We reviewed and analyzed the Meal Plan refund calculations spreadsheet consisting of 2,169 students who received meal refunds or credits totaling \$813,172. Using the data available and recalculating 100 percent of the refunds, we found no material errors. Specifically, our test found 28 instances of students with erroneous calculations out of 2,169 students, representing an error rate of 1.29%. The total absolute and net values, \$4,401 (0.54%) and \$1,497 (0.18%), respectively, related to these instances were similarly insignificant. (Refer to Appendix II for the test results of meal plan refunds.) Moreover, the causes for these errors were deemed to be non-systemic.

**APPENDIX I – Calculation of Student Housing Refunds**

Count	Description/Cause/Disposition	Absolute Value Refunded	Net Value Refunded (Under) / Over
35	Student housing (MMC) under-refunded. The Office of Housing and Residential Life inadvertently used the online check-out date (March 23, 2020) rather than the actual date the students left the dormitories (March 16, 2020) in their calculation of the prorated amount. Management agreed to credit the 35 students for the seven (7) additional days from the Institutional Portion of the CARES Act.	\$7,465	(\$7,465)
1	Student housing (MMC) over-refunded. The Office of Housing and Residential Life issued the credit due to an incorrect student in error. Management stated that requesting the student to return the funds would create hardship and instead has decided to replace the over-refund from the Housing department funds.	\$1,051	\$1,051
36	<b>Total absolute value and net value (under) refunded</b>	<b>\$8,516</b>	<b>(\$6,414)</b>
1.19%	<b>Percentage of error in sample tested (rate of error)</b>	<b>0.25%</b>	<b>(0.19%)</b>

Note: The error rates achieved by the test are insignificant in terms of the incident count and amount.

## APPENDIX II – Calculation of Student Meal Plan Refunds

Count	Description/Cause/Disposition	Absolute Value Refunded	Net Value Refunded (Under) / Over
12	Student overpaid meal refund. Rather than using a 9-week meal plan, an incorrect meal plan was used for these student-athletes (specifically, a 14-week meal plan for 11 and an Unlimited Plus Meal Plan Housing for one). The Athletics Department confirmed that all the students contracted for a 9-week period and that the students received additional dining dollars of \$565 paid by the department. The Office of Business Services explained that the multiple meal plans in the CSGold report created confusion because rather than using a specific meal plan item type, these specific transactions utilized a generic item type number available within PantherSoft, which made it difficult to identify the actual meal plan purchased. In their calculation, they selected the meal plan with the least number of swipes remaining.	\$1,968	\$1,968
8	Student under-refunded meal refund (Dining Dollar). The formula the Office of Business Services used in its calculation did not consider students' Dining Dollar carryover balances from fall 2019. Affected students still enrolled in the meal plan will have their account credited to the fall 2021 balance for future use. Affected student without a meal plan will be refunded directly from the Office of Business Services funds.	\$1,452	(\$1,452)
4	Student overpaid meal refund. The refund was calculated on the full cost of the meal plan rather than the prorated amount paid by the student upon entry into the meal plan late in the semester, as confirmed by Student Financials.	\$ 656	\$ 656
3	Student overpaid meal refund. The student revised his/her meal plan, but the original meal plan was used to prorate the refund. The CSGold report contained multiple meal plans and the Office of Business Services used the meal plan with the least number of swipes remaining. The error caused two (2) students to have an over-refund and one (1) to be under-refunded.	\$ 159	\$ 159
1	Student overpaid meal refund. The student received the balance of dining dollars in his/her account plus the pro-rata amount of a terminated meal plan rather than simply the dining dollars balance. The Office of Business Services was not aware of the cancellation. The Office of Student Financials confirmed cancellation.	\$ 166	\$ 166
28	<b>Total absolute value and net value over-refunded</b>	<b>\$4,401</b>	<b>\$1,497</b>
1.29%	<b>Percentage of error in sample tested (rate of error)</b>	<b>0.54%</b>	<b>0.18%</b>

Note: The error rates achieved by the test are insignificant in terms of the incident count and amount.

**APPENDIX III – OIA Contact and Staff Acknowledgment:**

**OIA contact:**

Joan Liew 305-348-2107 or jliew@fiu.edu

**Contributors to the report:**

In addition to the contact named above, the following staff contributed to this audit in the designated roles:

Dayan Borges (auditor in-charge)

Manuel Sanchez (supervisor and reviewer)

## **Definition of Internal Auditing**

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**Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.**