

Agendum  
Oakland University  
Board of Trustees  
Audit Committee  
October 7, 2013

**DRAFT SCHEDULE OF EXPENDITURES OF FEDERAL AWARD PROGRAMS IN ACCORDANCE WITH OMB CIRCULAR A-133 YEAR ENDED JUNE 30, 2013**

1. **Division and Department:** Finance and Administration, Controller's Office
2. **Introduction:** The draft Schedule of Expenditures of Federal Award Programs in Accordance with OMB Circular A-133 Year Ended June 30, 2013 (Schedule) for Oakland University (University) has been completed (Attachment A).

The audit opinion of Andrews Hooper Pavlik P.L.C. (AHP) states:

"Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified."

"In our opinion, the University complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2013."

"The results of our auditing procedures disclosed an instance of noncompliance, which is required to be reported in accordance with OMB Circular A-133 and which is described in the accompanying schedule of findings and questioned costs as item 2013-1. Our opinion on each major federal program is not modified with respect to this matter. The University's response to the noncompliance finding identified in our audit is described in the accompanying schedule of findings and questioned costs. The University's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response."

"We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses."

"In our opinion, the Schedule of Expenditures of Federal Awards is fairly stated in all material respects in relation to the financial statements as a whole."

Representatives from AHP will present the draft Schedule to the Board of Trustees' Audit Committee.

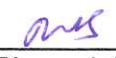
3. **Previous Board Action:** As a result of a competitive bid process, the public accounting firm of AHP was appointed by the Board of Trustees (Board) on March 7, 2007, and reappointed on January 9, 2008, October 30, 2008, and April 10, 2010; and

**Draft Schedule of Expenditures of Federal Award Programs in  
Accordance with OMB Circular A-133 Year Ended June 30, 2013  
Oakland University  
Board of Trustees  
Audit Committee  
October 7, 2013  
Page 2**


following another competitive bid process, AHP was reappointed by the Board on March 15, 2011, March 28, 2012, and February 12, 2013, to conduct annual audits of the University's financial accounting records.

4. **Budget Implications:** The annual financial audits are budgeted for in the General Fund. No budget variances have occurred or are expected.
5. **Educational Implications:** None.
6. **Personnel Implications:** None.
7. **University Reviews/Approvals:** The Schedule was prepared by the Controller's Office and reviewed by the Vice President for Finance and Administration, and Interim President, and audited by AHP.
8. **Board Action to be Requested:** At the October 7, 2013 Formal Session, the Board will be asked to accept the Schedule.
9. **Attachments:**
  - A. Draft Schedule of Expenditures of Federal Award Programs in Accordance with OMB Circular A-133 Year Ended June 30, 2013

**Submitted by Vice President for Finance and Administration  
And Treasurer John W. Beaghan:**

  
\_\_\_\_\_  
(Please initial)

**Reviewed by Secretary Victor A. Zambardi:**

  
\_\_\_\_\_  
(Please initial)

**Reviewed by Interim President Betty J. Youngblood:**

  
\_\_\_\_\_  
(Please initial)

**DRAFT**

Oakland University  
Schedule of Expenditures  
of Federal Award Programs  
in Accordance with OMB Circular A-133

*Year ended June 30, 2013*

Oakland University

Schedule of Expenditures  
of Federal Award Programs  
in Accordance with OMB Circular A-133

Year ended June 30, 2013

**Table of Contents**

Independent Auditors' Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i> .....	1
Independent Auditors' Report on Compliance For Each Major Program; Report on Internal Control Over Compliance; and Report on the Schedule of Expenditures of Federal Awards Required by OMB Circular A-133.....	3
Schedule of Expenditures of Federal Awards.....	6
Notes to Schedule of Expenditures of Federal Awards .....	8
Schedule of Findings and Questioned Costs.....	10
Summary Schedule of Prior Audit Findings.....	12

Independent Auditors' Report on Internal Control Over Financial Reporting  
and on Compliance and Other Matters Based on an Audit of Financial  
Statements Performed in Accordance with *Government Auditing Standards*

Board of Trustees  
Oakland University  
Rochester, Michigan

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of Oakland University (University), as of and for the year ended June 30, 2013, and the related notes to the financial statements, which collectively comprise Oakland University's financial statements, and have issued our report thereon dated September 23, 2013.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered Oakland University's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Oakland University's internal control. Accordingly, we do not express an opinion on the effectiveness of Oakland University's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the University's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

## **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the University's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

## **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of our testing, and not to provide an opinion on the effectiveness of the University's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the University's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Auburn Hills, Michigan  
September 23, 2013

Independent Auditors' Report on Compliance For Each Major Program;  
Report on Internal Control Over Compliance; and Report on the Schedule  
of Expenditures of Federal Awards Required by OMB Circular A-133

Board of Trustees  
Oakland University  
Rochester, Michigan

**Report on Compliance for Each Major Federal Program**

We have audited Oakland University's (University) compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the University's major federal programs for the year ended June 30, 2013. The University's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

***Management's Responsibility***

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

***Auditor's Responsibility***

Our responsibility is to express an opinion on compliance for each of the University's major federal programs based on our audit of the types of compliance requirements referred to above.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the University's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the University's compliance.

### ***Opinion on Each Major Federal Program***

In our opinion, the University complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2013.

### ***Other Matters***

The results of our auditing procedures disclosed an instance of noncompliance, which is required to be reported in accordance with OMB Circular A-133 and which is described in the accompanying schedule of findings and questioned costs as item 2013-1. Our opinion on each major federal program is not modified with respect to this matter.

The University's response to the noncompliance finding identified in our audit is described in the accompanying schedule of findings and questioned costs. The University's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

### **Report on Internal Control Over Compliance**

Management of the University is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the University's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the University's internal control over compliance.

*A deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis.

*A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.



The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

**Report on Schedule of Expenditures of Federal Awards Required by OMB Circular A-133**

We have audited the financial statements of Oakland University as of and for the year ended June 30, 2013 and have issued our report thereon dated September 23, 2013, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the financial statements. Such information is the responsibility of management and was derived from, and relates directly to, the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the Schedule of Expenditures of Federal Awards is fairly stated in all material respects in relation to the financial statements as a whole.

Auburn Hills, Michigan  
September 23, 2013

## Oakland University

## Schedule of Expenditures of Federal Awards

Year ended June 30, 2013

Federal Grant/Pass Through Grant Program Title	Federal Catalog or Grant Number		Federal Expenditures
<b>Research and Development</b>			
U.S. Department of Health and Human Services:			
National Institutes of Health:			
Basic Research Support Grants (17)	93.RD	*(1)	\$ 1,758,920
American Recovery and Reinvestment Act (3)	93.701	*(1)	62,124
Passed through Michigan State University	93.262	*(1)	191,711
Passed through William Beaumont Hospital (2)	93.866	*(1)	158,099
Passed through Harvard University	93.855	*(1)	5,227
Passed through the University of Illinois	93.879	*(1)	1,411
Substance Abuse and Mental Health Services Administration:			
Basic Research Support Grant	93.243	*(1)	55,142
Health Resources and Services Administration:			
Basic Research Support Grant	93.124	*(1)	28,504
U.S. Army:			
Basic Research Support Grants (10)	12.RD	*(1)	1,143,178
Passed through the University of Michigan	12.RD	*(1)	152,014
Passed through Michigan State University	12.RD	*(1)	45,356
National Science Foundation:			
Basic Research Support Grants (22)	47.RD	*(1)	1,230,885
American Recovery and Reinvestment Act (4)	47.082	*(1)	215,316
Passed through Indiana University	47.074	*(1)	53,136
Passed through Illinois State University	47.076	*(1)	2,670
Passed through the University of South Alabama	47.076	*(1)	14,042
Passed through the Oakland County Community Health Association	47.076	*(1)	67,162
Passed through U.S. Civilian Research & Development Foundation	47.079	*(1)	1,890
Passed through the Stevens Institute of Technology	47.076	*(1)	96
U.S. Air Force:			
Passed through RNET Technologies	12.RD	*(1)	3,361
U.S. Department of Agriculture:			
Basic Research Support Grant	10.310	*(1)	736,844
U.S. Navy:			
Basic Research Support Grants (3)	12.300	*(1)	280,445
Passed through the University of Nebraska-Lincoln	12.RD	*(1)	14,602
U.S. Department of Defense:			
National Security Agency:			
Basic Research Support Grant	12.901	*(1)	691
Passed through Mississippi State University (2)	12.RD	*(1)	304,261
Passed through the University of Michigan	12.910	*(1)	123,317
Passed through Yale University	12.910	*(1)	139,022
Passed through General Dynamics Land Systems, Inc.	12.RD	*(1)	20,358
U.S. Department of Education:			
American Recovery and Reinvestment Act passed through			
Ohio State University	84.396	*(1)	547,951
Passed through Ohio State University	84.396	*(1)	4,328
Passed through Michigan State University	84.337	*(1)	5,354

The accompanying notes are an integral part of the Schedule of Expenditures of Federal Awards.

## Oakland University

## Schedule of Expenditures of Federal Awards (continued)

Federal Grant/Pass Through Grant Program Title	Federal Catalog or Grant Number		Federal Expenditures
<b>Research and Development (continued)</b>			
U.S. Department of Energy:			
Basic Research Support Grant	81.086	*(1)	\$ 89,064
American Recovery and Reinvestment Act passed through University of Minnesota	81.122	*(1)	1,036
Passed through U.S. Automotive Material Partnership (3)	81.000	*(1)	2,906
Passed through Battelle (4)	81.RD	*(1)	122,121
Passed through Intelligent Automation, Inc.	81.086	*(1)	18,591
Passed through Oak Ridge National Laboratory	81.RD	*(1)	25,124
U.S. Department of Transportation:			
Basic Research Support Grant	20.108	*(1)	25,343
Environmental Protection Agency:			
Passed through Wayne State University	66.469	*(1)	18,832
Passed through International Joint Commission	66.469	*(1)	10,038
Passed through the Clinton River Watershed Council	66.469	*(1)	7,612
National Writing Project Corporation	84.928A	*(1)	15,635
National Aeronautics & Space Administration:			
Passed through the Michigan Space Grant Consortium and the University of Michigan (9)	43.000	*(1)	25,457
Total Research and Development			<u>7,729,176</u>
U.S. Department of Education:			
Student Financial Assistance:			
Federal Supplemental Educational Opportunity Grants	84.007	*(1)	509,449
Federal Work-Study Program (Note 7)	84.033	*(1)	384,399
Federal Perkins Loan Program (Note 5)	84.038	*(1)	268,164
Federal Pell Grant Program (Note 6)	84.063	*(1)	20,726,249
William D. Ford Federal Direct Loan Program (Note 4)	84.268	*(1)	106,481,620
National Teach Grant	84.379	*(1)	303,610
Total Student Financial Assistance			<u>128,673,491</u>
TRIO Program:			
Upward Bound (2)	84.047A	*(1)	543,591
Gear Up:			
Passed through the State of Michigan (5)	84.334S		145,871
Fund For Improvement of Postsecondary Education (2)	84.021		21,688
CCAMPIS	84.335		54,590
Passed through the Michigan Department of Education:			
Improve Literacy Teaching and Learning in Urban Schools (2)	84.367		103,298
U.S. Department of Energy – ARRA	81.087	*	492,943
U.S. Department of Agriculture			
Passed through Southeastern Michigan Resource Conservation and Development Council	10.001		65,000
Economic Development Administration	11.307		148,410
National Endowment for the Arts	45.025		2,050
National Writing Project Corporation	84.367		29,355
Small Business Administration:			
Passed through Macomb County	59.006		41,089
Total Expenditures of Federal Awards			<u>\$138,050,552</u>

\* Denotes a major program.

(1) Denotes a cluster.

The accompanying notes are an integral part of the Schedule of Expenditures of Federal Awards.

## Oakland University

## Notes to Schedule of Expenditures of Federal Awards

Year ended June 30, 2013

**1. Summary of Significant Accounting Policies**

The accompanying Schedule of Expenditures of Federal Awards (Schedule) includes the federal grant activity of the University under programs of the federal government for the fiscal year ended June 30, 2013. Expenditures reported on the Schedule are reported on the same basis of accounting as the financial statements, although the basis for determining when federal awards are expended is presented in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. In addition, expenditures reported on the Schedule are recognized following the cost principles contained in OMB Circular A-21, *Cost Principles for Educational Institutions*, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Therefore, some amounts presented in this Schedule may differ from amounts presented in, or used in the preparation of, the financial statements.

Because the Schedule presents only a selected portion of the operations of Oakland University, it is not intended to, and does not, present the financial position, changes in net position, or cash flows, if applicable, of Oakland University.

The University reporting entity is defined in Note 1 to the University's financial statements. All federal financial assistance received directly from federal agencies as well as federal financial assistance passed through other government agencies is included on the Schedule.

**2. Major Programs and Clusters**

As defined in OMB Circular A-133, Student Financial Assistance programs, Trio, and Research and Development programs are considered to be clusters of programs and, accordingly, have been classified as one program for testing purposes. The Student Financial Assistance Cluster, Trio Cluster, Research and Development Cluster, and the U.S. Department of Energy – ARRA CFDA Number 81.087 have been defined as major programs. In determining major programs, the entire Student Financial Assistance cluster was removed due to the large loan and loan guarantee funds within the cluster.

**3. Administrative Costs**

The following administrative cost allowances were received by the University:

Federal Perkins Loan Program	\$13,408
Federal Work-Study Program	24,620
Federal Supplemental Educational Opportunity Grant Program	33,963
Federal Pell Grant Program	28,310

The University has approved predetermined indirect cost rates that are effective for the year ended June 30, 2013. The base rate for on-campus is 48% of Modified Total Direct Cost.

## Oakland University

## Notes to Schedule of Expenditures of Federal Awards (continued)

**4. William D. Ford Federal Direct Loan Program**

During the 2012/2013 award year, the University participated in the U.S. Department of Education Federal Direct Loan Program. Under this program, Direct Subsidized Loans, Direct Unsubsidized Loans, and Direct PLUS Loans are made from the Department of Education to the students. The University is responsible for completing portions of the loan applications, verifying student eligibility, and handling the disbursement of the proceeds to these students. For the year ended June 30, 2013, Direct Student Loans totaled \$95,701,632 (\$31,038,075 subsidized and \$64,663,557 unsubsidized), Direct Parent Loans for Undergraduate Students (PLUS) totaled \$8,174,954, and Direct PLUS Graduate Loans totaled \$2,605,034.

**5. Federal Perkins Loan Program**

The University utilizes the services of University Accounting Services, Inc. (UAS) to administer the repayment of Perkins Loans and perform certain due diligence procedures. The UAS Compliance Attestation Examination of the Title IV Student Financial Assistance Programs report for the fiscal year ended June 30, 2013 was received and reviewed. No significant items of noncompliance or control weaknesses were noted. During the 2012/2013 fiscal year, Perkins Loans were issued which included no current year federal contribution. There was \$1,804,648 of Federal Perkins Loans (CFDA Number 84.038) outstanding as of June 30, 2013.

Total program disbursements under the Federal Perkins Loans program for the year ended June 30, 2013 were as follows:

Student loans awarded	\$268,164
-----------------------	-----------

The amount shown as Federal Perkins Loan Program loans and loan guarantees represents the amounts loaned by the University during the year less the current year Federal contribution, if any.

**6. Federal Pell Grant Program**

The Federal Pell Grant Program authorization is based on the most recent ED255-6; Federal Pell Grant Program Statement of Account dated June 26, 2013. Expenditures are the actual amounts incurred through June 30, 2013. The University will process amendments at year end to finalize the 2012/2013 award year.

**7. Federal Work-Study Program**

During the year, the University transferred \$14,183 from the Federal Work-Study Program to the Job Location and Development Program. This expenditure is being reported as part of the Federal Work-Study Program on the Schedule and was fully expended.

Oakland University

Schedule of Findings and Questioned Costs

Year ended June 30, 2013

Section I – Summary of Independent Auditors’ Results

**Financial Statements**

Type of auditors’ report issued:	<u>Unmodified</u>	
Internal control over financial reporting:		
Material weakness(es) identified?	_____ Yes	<u>  X  </u> No
Significant deficiencies identified that are not considered to be material weakness(es)?	_____ Yes	<u>  X  </u> None Reported
Noncompliance material to financial statements noted?	_____ Yes	<u>  X  </u> No

**Federal Awards**

Internal control over major program:		
Material weakness(es) identified?	_____ Yes	<u>  X  </u> No
Significant deficiencies identified that are not considered to be material weakness(es)?	_____ Yes	<u>  X  </u> None Reported
Type of auditors’ report issued on compliance for major program:	<u>Unmodified</u>	
Any audit findings disclosed that are required to be reported in accordance with Circular A-133, Section .510(a)?	<u>  X  </u> Yes	_____ No

Identification of major programs:

<u>Federal Grantor/Program Name</u>	<u>Federal Catalog or Grantor Number</u>
<b>Student Financial Assistance Cluster</b>	
U.S. Department of Education	84.007; 84.033; 84.038; 84.063; 84.268; 84.379
<b>Research and Development Cluster</b>	
U.S. Department of Health and Human Services	93.RD; 93.701; 93.262; 93.855; 93.879; 93.866; 93.243; 93.124
U.S. Army	12.RD
National Science Foundation	47.RD; 47.082; 47.074; 47.076; 47.079
U.S. Air Force	12.RD
U.S. Department of Agriculture	10.310
U.S. Navy	12.300; 12.RD
U.S. Department of Defense	12.RD; 12.901; 12.910
U.S. Department of Education	84.396; 84.337
U.S. Department of Energy	81.086; 81.122; 81.000; 81.RD
U.S. Department of Transportation	20.108
Environmental Protection Agency	66.469
National Writing Project Corporation	84.928A
National Aeronautics & Space Administration	43.000
<b>TRIO Cluster</b>	
U.S. Department of Education	84.047A
<b>U.S. Department of Energy – ARRA</b>	81.087

Dollar threshold used to distinguish between Type A and Type B programs:	<u>\$300,000</u>	
Auditee qualified as low-risk auditee?	<u>  X  </u> Yes	_____ No

## Oakland University

## Schedule of Findings and Questioned Costs (continued)

Section II – Findings Relating to the Financial Statements Reported in Accordance with *Government Auditing Standards*

None.

## Section III – Findings and Questioned Costs Relating to Federal Awards

## Research and Development Cluster:

2013-1 U.S. Department of Agriculture – Child Health Incubator Research Project (CHIRP) – CFDA No. 10.310

*Condition and Criteria:* The University's Internal Audit Department conducted an audit and identified deficiencies in the University's subrecipient monitoring process for the CHIRP grant, which resulted in costs that were not supported by sufficient documentation or were disallowed; therefore, the costs were unallowable. The University took action and subsequently corrected the issue.

*Effect:* Failure to properly monitor subrecipients could result in noncompliance with grant requirements and potential questioned costs.

*Cause:* The Office of Research Administration (ORA) followed its standard operating procedure for subrecipient monitoring. The CHIRP grant was an unusual grant for the University in that it has 7 subrecipients which are local not-for-profit entities that are not subject to OMB Circular A-133 audit requirements; therefore, the subrecipients are considered higher risk and require more comprehensive monitoring by the University to ensure compliance with the grant requirements. This issue is considered to be an isolated incident due to the unusual nature of the subrecipients as the University does not typically have higher risk subrecipients.

*Context:* This issue was identified during an internal audit of the ORA grant administration process that was conducted during fiscal year 2013.

*Auditor's Recommendation:* ORA should implement more comprehensive subrecipient monitoring procedures for high-risk subrecipients to ensure compliance with laws and regulations governing grant expenditures.

*Views of Responsible Officials and Planned Corrective Actions:* Management agrees with this finding. We have revised and updated our standard operating procedures for subrecipient monitoring to provide for risk analysis, appropriate oversight procedures, and delineation of responsibilities of the Principal Investigator and ORA personnel in order to provide optimal monitoring of high-risk projects.

Oakland University  
Summary Schedule of Prior Audit Findings  
Year ended June 30, 2013

No matters were reported.