

**STATE OF FLORIDA AUDITOR GENERAL**

**Operational Audit**

Report No. 2020-120  
February 2020

**FLORIDA GULF COAST UNIVERSITY**



Sherrill F. Norman, CPA  
Auditor General

## Board of Trustees and President

During the period January 1, 2018 through December 31, 2018, Dr. Michael V. Martin served as President of Florida Gulf Coast University and the following individuals served as Members of the Board of Trustees:

Blake Gable, Chair from 1-9-18 <sup>a</sup>	Dr. Mike McDonald <sup>c</sup>
Robbie Roepstorff, Vice Chair from 1-9-18	J. Leo Montgomery
J. Dudley Goodlette, Chair through 1-5-18 <sup>a</sup>	Kevin Price
Dr. Ken Smith, Vice Chair through 1-8-18	Russell Priddy through 6-20-18 <sup>b</sup>
Ashley Coone from 9-25-18 <sup>b</sup>	Stephen Smith from 1-26-18 <sup>d</sup>
Darlene Cors	Christian Spilker
Richard Eide Jr. from 1-6-18	Jalisa White <sup>e</sup>
Joseph Fogg III	

<sup>a</sup> Chair position vacant 1-6-18, through 1-8-18.

<sup>b</sup> Trustee position vacant 6-21-18, through 9-24-18.

<sup>c</sup> Faculty Senate Chair.

<sup>d</sup> Trustee position vacant 1-1-18, through 1-25-18.

<sup>e</sup> Student Body President.

The team leader was Claudia A. Salgado, and the audit was supervised by Ramon L. Bover, CPA.

Please address inquiries regarding this report to Jaime N. Hoelscher, CPA, Audit Manager, by e-mail at [jaimehoelscher@aud.state.fl.us](mailto:jaimehoelscher@aud.state.fl.us) or by telephone at (850) 412-2868.

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# FLORIDA GULF COAST UNIVERSITY

## **SUMMARY**

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This operational audit of Florida Gulf Coast (University) focused on selected University processes and administrative activities and included a follow-up on findings noted in our report No. 2017-064. Our operational audit disclosed the following:

**Finding 1:** Some unnecessary information technology user access privileges existed that increased the risk that unauthorized disclosure of sensitive personal employee and student information may occur.

**Finding 2:** As similarly noted in our report No. 2017-064, University textbook affordability procedures could be improved.

**Finding 3:** University records did not always evidence that, for administrative new hires, interviews were conducted and work experience was verified.

## **BACKGROUND**

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The Florida Gulf Coast University (University) is part of the State university system of public universities, which is under the general direction and control of the Florida Board of Governors (BOG). The University is directly governed by a Board of Trustees (Trustees) consisting of 13 members. The Governor appoints 6 citizen members and the BOG appoints 5 citizen members. These members are confirmed by the Florida Senate and serve staggered 5-year terms. The Faculty Senate Chair and Student Body President also are members.

The BOG establishes the powers and duties of the Trustees. The Trustees are responsible for setting University policies, which provide governance in accordance with State law and BOG Regulations. The University President is selected by the Trustees and confirmed by the BOG. The University President serves as the Executive Officer and the Corporate Secretary of the Trustees and is responsible for administering the policies prescribed by the Trustees for the University.

## **FINDINGS AND RECOMMENDATIONS**

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### **Finding 1: Information Technology User Access Privileges**

The Legislature has recognized in State law<sup>1</sup> that social security numbers (SSNs) can be used to acquire sensitive personal information, the release of which could result in fraud against individuals or cause other financial or personal harm. Therefore, public entities are required to provide extra care in maintaining the confidential status of such information. Effective controls restrict employees from accessing information unnecessary for their assigned functions and provide for documented, periodic evaluations of information technology (IT) access privileges to help prevent employees from accessing sensitive personal information of employees and students inconsistent with their functions.

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<sup>1</sup> Section 119.071(5)(a), Florida Statutes.

According to University personnel and records, the University established a unique identifier, other than the SSN, to identify employees and students and maintained employee and student information, including SSNs, in the University IT system. Pursuant to State law, the University collects and uses SSNs for various purposes, such as to identify and verify employees and students, process employee benefits, comply with Federal employee tax requirements, register newly enrolled students, and comply with Federal and State requirements related to financial and academic assistance.

Student SSNs are also maintained to provide student transcripts to other universities, colleges, and potential employers based on student-authorized requests. To help protect employee and student information from unauthorized disclosure, modification, or destruction, the University requires documented approval of IT user access privileges including access to employee and student SSNs based on a demonstrated need for such access and annual evaluations of these privileges to confirm the propriety of the privileges. For prospective students who apply for entrance into the University but do not enroll, the University retains records containing sensitive personal information for 2 years and then purges the records.

As of November 14, 2019, University personnel indicated that the IT system contained SSNs and other sensitive personal information for a total of 264,567 employees and students, including 4,396 current and former employees and 260,171 current, former, and prospective students. According to University personnel, 81 employees had user access privileges to that information and the IT system did not have a mechanism to differentiate user access privileges to:

- Employee information from access privileges to student information.
- Current employee information from access privileges to former employee information.
- Current student information from access privileges to former and prospective student information.
- Employee and student SSNs from access to vendor tax identification numbers.

As part of our audit procedures, we examined University records demonstrating that the security administrators or their designees performed periodic evaluations of IT user access privileges. Notwithstanding, our examination of the 81 employees' user access privileges disclosed that 67 employees had unnecessary access privileges primarily because the IT system could not limit user access privileges to only the data required for the user to perform their assigned functions. Specifically:

- 61 employees (e.g., admission operations, financial aid and scholarship, records and registration, and campus life employees) had necessary IT user access privileges to student SSNs but also had unnecessary access to employee SSNs.
- 3 University Controller Department employees required IT user access privileges to all University employee SSNs, including University-employed students, for Federal tax reporting purposes. However, these 3 employees also had unnecessary access to the SSNs in the IT system of all former, current, and prospective students, including those who were not University employees.
- 3 Procurement Services Department employees had unnecessary access privileges to both employee and student SSNs. While the 3 employees' responsibilities required access to vendor tax identification numbers for Federal tax reporting purposes, these 3 employees did not need access privileges to employee or student SSNs.

The existence of unnecessary access privileges increases the risk of unauthorized disclosure of sensitive personal information and the possibility that such information is used to commit a fraud against or otherwise harm University employees and students. In response to our inquiry, University personnel indicated in October 2019 that the University plans to replace the IT system in July 2020 with a system that will provide improved features and functionality and more robust security.

**Recommendation:** To properly safeguard and protect employee and student sensitive personal information, the University should ensure that only those employees who have a demonstrated need to access sensitive personal information of employees and students, including SSNs, and vendor tax identification numbers be granted such access. To help accomplish this, the University should ensure that the IT system enables the differentiation of IT user access privileges to:

- Employee information from access privileges to student information.
- Current employee information from access privileges to former employee information.
- Current student information from access privileges to former and prospective student information.
- Employee and student SSNs from vendor tax identification numbers.

## Finding 2: Textbook Affordability

State law<sup>2</sup> requires universities to post prominently in the course registration system and on the university Web site, as early as feasible, but not less than 45 days before the first day of class for each term, a hyperlink to lists of required and recommended textbooks and instructional materials for at least 95 percent of all courses and course sections offered at the university during the upcoming term.

The University contracted with the Bookstore Vendor to manage and operate the bookstore, as well as compile and post adopted textbooks and instructional materials in the course registration system and on the University Bookstore Web site. University policies<sup>3</sup> require that course instructors submit a list of required and recommended textbook and instructional materials to the Bookstore Vendor by the designated date<sup>4</sup> posted in the academic calendar for each term to determine whether the items are available for purchase. If available, the textbooks and instructional materials are to be posted simultaneously on the University course registration system and University Bookstore Web site. University policies also require the Provost Office to e-mail notifications to faculty members who had not submitted the list to the Bookstore Vendor by the designated date.

As part of our audit procedures, we selected for examination University records for the Spring 2018 and Fall 2018 Semesters supporting the dates that textbook and instructional materials were posted in the University course registration system and on the University Bookstore Web site. For those semesters, Table 1 shows the number and percentage of courses and course sections with textbook and instructional materials posted timely and the number with textbook and instructional materials posted late.

<sup>2</sup> Section 1004.085(5), Florida Statutes.

<sup>3</sup> University Policy 3.036 - *Textbook Adoption and Affordability Policy*.

<sup>4</sup> The designated dates for the Spring 2018 and Fall 2018 Semesters were October 13, 2017, and April 13, 2018, respectively, or 87 and 129 days before the first day of class for each term.

**Table 1  
Textbook and Instructional Materials Postings**

<b>Number Posted</b>	<b>Spring 2018 Course and Course Sections</b>	<b>Fall 2018 Course and Course Sections</b>
Timely	1,434	1,687
Late	233	478
<b>Percent Timely</b>	<b><u>86%</u></b>	<b><u>78%</u></b>

Source: University records.

As the University only timely posted the textbooks and instructional materials for 86 and 78 percent of the course and course sections for the Spring 2018 and Fall 2018 Semesters, respectively, the University did not comply with State law requiring such information be timely posted for at least 95 percent of the courses. In response to our inquiries, University personnel indicated that untimely postings occurred primarily because, for several course sections, the instructors revised the materials to be used in their courses after the statutory required time frame for posting the information.

The timely posting of required textbook and instructional materials information on the University course registration system and University Bookstore Web site is necessary for students to understand course textbook and instructional materials requirements, have sufficient time to consider purchase options, and potentially limit their textbook and instructional materials costs. A similar finding was noted in our report No. 2017-064.

**Recommendation: The University should take appropriate action to comply with State law by posting prominently in the course registration system and on the University Bookstore Web site, as early as feasible, but not less than 45 days before the first day of class for each term, a hyperlink to lists of required and recommended textbooks and instructional materials for at least 95 percent of all courses and course sections offered at the University during the upcoming term. Such action should include continued Provost Office e-mail notifications to remind faculty members of the statutory textbook affordability requirements.**

**Finding 3: Employment Practices**

Among other things, effective employment practices require, before individuals are selected to fill vacancies, employers to interview suitable applicants and verify that individuals meet the position work experience requirements. Employers should maintain records of the interview and verification processes to support hiring decisions.

University employment practices involve, for example, completion of an interview form to document the interview process, including applicant responses to interviewer questions, and a reference check form to document verifications with former employers regarding the applicant’s previous position, length of employment, and performance. After the interview and verification processes are completed, these forms are forwarded to the University Human Resources Department and the applicable University hiring official before a job offer is made to the applicant.

As part of our audit, we requested for examination University records supporting 28 selected administrative new hires from the 205 administrative new hires during the period April 2016 through December 2018. Interview and reference check forms were not provided for 5 administrative new hires who were required to have 2 to 5 years of relevant work experience. In response to our inquiries, University personnel indicated that, for those new hires, interviews were conducted and work experience was verified but that, due to University personnel oversights, the forms were either not completed or completed and not maintained. Interview and reference check forms document information essential for making personnel decisions and provide assurances that individuals selected for hire meet the applicable job requirements.

**Recommendation: The University should enhance procedures to ensure that, before individuals are selected to fill position vacancies, required interview and reference check forms are completed. Such documentation should be maintained in the applicable personnel files to support the hiring decisions.**

## ***PRIOR AUDIT FOLLOW-UP***

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The University had taken corrective actions for findings included in our report No. 2017-064, except that Finding 2 was also noted in our Report No. 2017-064 as Finding 1.

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

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

We conducted this operational audit from March 2019 through September 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The objectives of this operational audit were to:

- Evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering assigned responsibilities in accordance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines.
- Examine internal controls designed and placed in operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, reliability of records and reports, and safeguarding of assets, and identify weaknesses in those controls.
- Determine whether management had taken corrective actions for findings included in our report No. 2017-064.
- Identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

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

As described in more detail below, for those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included transactions, as well as events and conditions, occurring during the audit period of January 2018 through December 2018, and selected University actions taken prior and subsequent thereto. Unless otherwise indicated in this report, these records and transactions were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

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

In conducting our audit, we:

- Reviewed University information technology (IT) policies and procedures to determine whether the policies and procedures addressed certain important IT control functions, such as security, systems development and maintenance, and disaster recovery.
- Evaluated University procedures for maintaining and reviewing employee access privileges to IT resources. We examined access privileges to the IT system finance and human resources applications during the audit period for 15 of the 166 employees who had such access to determine the appropriateness and necessity of the access based on the employees' job duties and the need to separate incompatible duties.
- Evaluated University procedures that prohibit former employees' access to University IT data and resources. Specifically, we examined the access privileges for 15 former employees to determine whether their access privileges had been timely deactivated.
- Evaluated University procedures for protecting sensitive personal information of employees and students, such as social security numbers (SSNs). Specifically, we examined University records supporting the access privileges of the 81 employees who had access to SSNs during the audit



period to evaluate the appropriateness and necessity of the access privileges based on the employees' assigned job duties.

- Evaluated the appropriateness of the University comprehensive IT disaster recovery plan during the audit period and determined whether it had been recently tested.
- Reviewed operating system, database, network, and application security settings to determine whether authentication controls were configured and enforced in accordance with IT best practices.
- Determined whether a comprehensive IT risk assessment had been established for the audit period to document the University risk management and assessment processes and security controls intended to protect the confidentiality, integrity, and availability of data and IT resources.
- Examined Board of Trustees (Trustees), committee, and advisory board meeting minutes and other records to determine whether Trustee approval was obtained for the University policies and procedures in effect during the audit period and for evidence of compliance with Sunshine Law requirements (i.e., proper notice of meetings, meetings readily accessible to the public, and properly maintained meeting minutes).
- Examined University records for the audit period to determine whether the University informed students and employees at orientation and on its Web site of the existence of the Florida Department of Law Enforcement sexual predator and sexual offender registry Web site and the toll-free telephone number that gives access to sexual predator and sexual offender public information as required by Section 1006.695, Florida Statutes.
- Examined University records supporting the internal audit function to determine whether the University followed applicable professional requirements, including assurance that peer review of the function had been conducted. In addition, we determined whether the internal audit reports were submitted to the Trustees.
- Examined University records to determine whether the University had developed an anti-fraud policy for the audit period to provide guidance to employees for communicating known or suspected fraud to appropriate individuals. Also, we examined University records to determine whether the University had implemented appropriate and sufficient procedures to comply with its anti-fraud policy.
- Examined University records supporting the 84 payments and transfers totaling \$20.4 million made during the audit period from the University to its direct-support organizations (DSOs) to determine whether the transactions were as prescribed by Section 1004.28(1)(a)2. and (2), Florida Statutes.
- Examined University records to determine whether the Trustees had prescribed by rule, pursuant to Section 1004.28(2)(b), Florida Statutes, the conditions with which the DSOs must comply in order to use University property, facilities, and personal services and whether the Trustees documented consideration and approval of anticipated property, facilities, and personal services provided to the DSOs and the related costs.
- From the population of 3,832 course sections reported to the Chancellor of the State University System for the Spring 2018 and Fall 2018 Semesters, examined University records to determine whether the University textbook affordability procedures complied with Section 1004.085(5), Florida Statutes.
- From the population of compensation payments totaling \$107.3 million made to 4,238 employees during the audit period, selected payments totaling \$2.2 million for 15 employees and examined the related payroll and personnel records to determine the accuracy of the rate of pay, the validity of employment contracts, whether performance evaluations were completed, the accuracy of leave records, and whether supervisory personnel reviewed and approved employee reports of time worked.

- For the 5 employees, including the former President, who received severance pay totaling \$227,559 during the audit period, examined related contract provisions and other University records, to determine whether the severance payments complied with Section 215.425(4), Florida Statutes, and University policies. Additionally, from the population of 39 employee contracts during the audit period, we examined severance pay provisions in 20 selected employee contracts to determine whether the provisions complied with Section 215.425(4), Florida Statutes.
- From the population of 620 administrative employees (including the President) who received compensation totaling \$18.4 million during the audit period, we examined University records for 20 selected employees (including the President) who received compensation totaling \$5.6 million to determine whether the amounts paid did not exceed the limits established in Sections 1012.975(3) and 1012.976(2), Florida Statutes.
- Selected 28 administrative new hires from the population of 205 administrative new hires during the period April 2016 through December 2018 to evaluate whether personnel records demonstrated that the employees had the necessary qualifications, education credentials, and work experience for the positions based on the applicable position descriptions.
- Examined University records to determine whether selected expenses were reasonable; correctly recorded; adequately documented; for a valid University purpose; properly authorized and approved; in compliance with applicable laws, rules, contract terms, and University policies and whether applicable vendors were properly selected. Specifically, from the population of expenses totaling \$59.5 million for the audit period, we examined University records supporting:
  - 30 selected payments for general expenses totaling \$1.5 million.
  - 21 selected payments for contractual services totaling \$0.4 million.
- From the population of 512 payments totaling \$140,396 during the audit period to employees for other than travel and compensation, examined 30 selected payments totaling \$42,395 to determine whether such payments were reasonable, adequately supported, for valid University purposes, and whether such payments were related to employees doing business with the University, contrary to Section 112.313(3), Florida Statutes.
- Reviewed documentation related to two of the nine major construction projects with total construction costs of \$1.9 million during the audit period to determine whether the University processes for selecting design professionals and construction managers were in accordance with State law; the subcontractor selection process was adequately monitored; the Trustees had adopted a policy establishing minimum insurance coverage requirements for design professionals; and design professionals provided evidence of required insurance. In addition, we selected six payments totaling \$1 million during the audit period for the two selected projects and examined University records to determine whether the payments were made in accordance with contract terms and conditions, University policies and procedures, and provisions of applicable State laws and rules.
- Determined whether the Board complied with investment requirements established in Section 218.415, Florida Statutes. Also, we determined whether any investment income was properly allocated to the funds that generated the investment income.
- Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
- Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
- Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions. Management's response is included in this report under the heading **MANAGEMENT'S RESPONSE**.

## ***AUTHORITY***

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Section 11.45, Florida Statutes, requires that the Auditor General conduct an operational audit of each University on a periodic basis. Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is fluid and cursive, with a large initial 'S'.

Sherrill F. Norman, CPA  
Auditor General

# MANAGEMENT'S RESPONSE

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February 10, 2020

Sherrill F. Norman, CPA  
Auditor General  
State of Florida  
G74 Claude Denson Pepper Building  
111 West Madison Street  
Tallahassee, Florida 32399-1450

Re: Operational Audit of Florida Gulf Coast University administered by State of Florida  
Florida Gulf Coast University (FGCU) Management Response and Corrective Action  
Plan for Audit Findings

Dear Ms. Norman:

Thank you for the opportunity to respond to the preliminary and tentative findings with regards to the FGCU Operational Audit performed by the Auditor General's Office for the period January 1, 2018 through December 31, 2018. Enclosed are the management responses from FGCU for the three audit findings. Contained within each management response is a written statement of explanation, including our actual or proposed corrective action.

If you have any questions or need additional information, please feel free to contact my office or William Foster, FGCU Director of Internal Audit, at your convenience.

Sincerely,

Michael V. Martin, Ph.D.  
President  
Florida Gulf Coast University

Enclosure

c: FGCU Board of Trustees  
Steve Magiera, Vice President for Administrative Services & Finance  
Susan Evans, Vice President and Chief of Staff  
Vee Leonard, Vice President and General Counsel  
William Foster, Director of Internal Audit  
June Gutknecht, University Controller  
Claudia Salgado, Senior Auditor, Auditor General's Office  
Ramon Bover, CPA, Audit Supervisor, Auditor General's Office

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## FGCU'S RESPONSE TO 2018 OPERATIONAL AUDIT PRELIMINARY AND TENTATIVE FINDINGS

### FINDING 1: INFORMATION TECHNOLOGY USER ACCESS PRIVILEGES

**Recommendation:** To properly safeguard and protect employee and student sensitive personal information, the University should ensure that only those employees who have a demonstrated need to access sensitive personal information of employees and students, including SSNs, and vendor tax identification numbers be granted such access. To help accomplish this, the University should ensure that the IT system enables the differentiation of IT user access privileges to:

- Employee information from access privileges to student information.
- Current employee information from access privileges to former employee information.
- Current student information from access privileges to former and prospective student information.
- Employee and student SSNs from vendor tax identification numbers.

#### FGCU RESPONSE:

The University agrees that in order to protect employee and student sensitive personal information, only those employees who have a demonstrated need to access sensitive personal information should be granted such access. FGCU requested assistance from the vendor of the current IT system to assess the changes necessary to correct this finding. The vendor and FGCU agree that the changes needed to comply with this finding would require extensive customization of the system that would be costly and time-consuming. At this time FGCU is mid-way through the first phase of an extensive replacement of the current IT system. In July 2020, the new IT system for employees will be implemented and will be configured to comply with this finding. Immediately following, the student system replacement will begin. The student system will also be configured to comply with this finding.

Implementation Date: July 2020

### FINDING 2: TEXTBOOK AFFORDABILITY

**Recommendation:** The University should take appropriate action to comply with State law by posting prominently in the course registration system and on the University Bookstore Web site, as early as feasible, but not less than 45 days before the first day of class for each term, a hyperlink to lists of required and recommended textbooks and instructional materials for at least 95 percent of all courses and course sections offered at the University during the upcoming term. Such action should include continued Provost Office e-mail notifications to remind faculty members of the statutory textbook affordability requirements.

#### FGCU RESPONSE:

The University agrees that procedures should be enhanced as related to the timely posting of required and recommended textbooks and materials. The University has implemented a new adoption system called Follett Discover in an effort to improve the adoption rate greater than 45 days before the first day of classes. The new system is more user-friendly and it provides more options for the faculty and the

students. This not only supports affordability but the system allows the faculty member to store course materials from one semester to the next; therefore when it is time to make new adoptions, it is less time-consuming when trying to search out course materials. If changes to course materials are made or needed, a list would appear showing all available materials for the respective course. This in itself should garner more cooperation by the faculty; thus more timely adoptions.

Another positive aspect of Follett Discover is that it provides real-time data which allows supervisors to go into the system at any time and see what the status is for adoptions in their respective departments. This data allows prompting of the faculty to make adoptions as deadlines draw near. Additionally, a representative from Academic Affairs, the University bookstore, the Office of the Registrar and the Controller's Office has met and designed a team to ensure accurate and consistent reporting. The effort has led to better communication among the offices and an agreed upon method of compilation. The efforts yielded a 97.4 percent timely adoption rate for Spring 2020. In addition to increased coordination among the relevant offices and the new adoption system, the Office of the Provost will continue to send out reminders to the faculty as a way to ensure timely adoptions.

Implementation Date: January 2020

### **FINDING 3: EMPLOYMENT PRACTICES**

**Recommendation: The University should enhance procedures to ensure that, before individuals are selected to fill position vacancies, required interview and reference check forms are completed. Such documentation should be maintained in the applicable personnel files to support the hiring decisions.**

#### **FGCU RESPONSE:**

The University agrees with the recommendation that we should enhance procedures to ensure that the hiring process documentation be maintained to support hiring decisions. FGCU Human Resources has initiated two (2) new processes to ensure enhanced hiring procedures and record retention:

- **Search and Interview Training:** For each posted job opening, Human Resources will train the assigned Panel Members or Committee members in an hour-long session. The training will focus on responsibilities of the Committee/Panel Chair, Hiring Official, and Search Committee/Panel. Covered topics include approval of job postings, required applicant materials, approval of candidates, approval of hiring questions, interview session materials including documented interview notes, the final offer, reference check process, meeting notices, meeting minutes and search material retention.
- **Internal HR Audit:** We have assigned the search material follow-up to a specific job function within the Human Resources team. This function will act as an audit role to ensure all materials are retained and provide a real-time oversight function to guarantee each step of the Search Process is followed according to University documented procedure.

Implementation Date: January 2020