



# B O A R D O F T R U S T E E S



## AUDIT COMMITTEE

Austin Peay State University

317 College Street

Clarksville, TN 37040

June 10, 2022

At the conclusion of the Business and Finance Committee Meeting

Call to Order

Roll Call/Declaration of a Quorum

Approval of Minutes

Action Items

A.Internal Audit Plan FY2023

Information Items

A.Review of Internal Audit Reports issued between February 19, 2022 and May 10, 2022

B.Quality Assessment and Improvement Program

C.Overview of Recently Completed External Audits

Adjourn



<b>Audit Committee Minutes</b>			
<b>3.18.22</b>		<b>10:09 a.m.</b>	<b>317 College Street Clarksville, TN 37040</b>
<b>Meeting Type</b>	<b>Audit Committee</b>		
<b>Notetaker</b>	<b>Beth Chancellor</b>		
<b>Attendees</b>	<b>Committee Members</b>		<b>Present (Y/N)</b>
	Brig. Gen. Robin Mealer, Chair		Y
	Ms. Katherine Johnson Cannata		Y
	Mr. Mike O'Malley		Y
	Dr. Phil Roe		Y
	Mr. Billy Atkins(ex-officio, voting)		Y
	<b>University Personnel</b>		
	Blayne Clements, Chief Audit Officer		Y
	Dr. Michael Licari, President		Y
	Dr. Carol Clark, Secretary to the Board		Y
	Ms. Dannelle Whiteside, Vice President for Legal Affairs and Organizational Strategy		Y
	<b>Call to Order</b>		
<b>Discussion</b>			
Trustee Mealer called the meeting to order at 10:09 a.m.			
<b>Roll Call/Declaration of a Quorum</b>			
<b>Discussion</b>			
Dr. Carol Clark, secretary to the board, called the roll.			
Trustee Mealer stated there was a quorum.			

<b>Approval of Minutes</b>	
Discussion	
Trustee Mealer presented the minutes of the December 3, 2021, meeting of the Audit Committee, both the public and executive sessions, to the committee for approval. She asked if there were any corrections or additions to the minutes. There were none.	
Conclusions	
Trustee Atkins moved to approve the minutes of the Audit Committee, both the public and executive sessions, as written. Trustee Roe seconded the motion.  A voice vote was taken and the motion carried unanimously with five trustees voting yes.	
<b>Action Item A – Consideration of the Revised FY2022 Audit Plan</b>	
Discussion	
Trustee Mealer recognized Blayne Clements, chief audit officer, for a report. Clements explained the Office of Internal Audit prepares an annual Audit Plan at the beginning of each fiscal year. The plan is based on the staffing and time resources available to perform audits and is prepared in conjunction with an annual risk analysis of the university's auditable areas.  The Audit Committee approved the fiscal year 2022 Internal Audit Plan on June 4, 2021. During the year, changes in audit priorities may result in alterations to the plan. The <i>International Standards for the Professional Practice of Internal Auditing</i> , issued by the Institute of Internal Auditors (IIA), requires the audit plan, and any significant changes to the plan, to be approved by the Audit Committee.	
Conclusions	
Trustee Cannata moved to approve the Revised FY2022 Audit Plan. Trustee O'Malley seconded the motion.  A voice vote was taken and the motion carried unanimously with five trustees voting yes.	
<b>Action Item B – Consideration of Revisions to the Audit Committee Charter</b>	
Discussion	
Trustee Mealer recognized Clements for a report. Clements explained the Audit Committee Charter requires the committee to review and assess the adequacy of the charter annually. The charter must also be approved by the state Comptroller's Office. The current charter was approved by the Board of Trustees on March 9, 2018, and by the state Comptroller's Office on March 13, 2018.	

The Audit Committee Charter has been revised to mirror language in the Board Bylaws. Other minor grammatical revisions were also made. Once approved by the committee and the full board, the charter will be submitted to the Office of the Comptroller of the Treasury for approval.

Conclusions

Trustee O'Malley moved to approve the Revised Audit Committee Charter. Trustee Cannata seconded the motion.

A voice vote was taken and the motion carried unanimously with five trustees voting yes.

#### **Information Item A – Review of Various Internal Audit Related Documents**

Discussion

Trustee Mealer recognized Clements for a report. Clements explained that various guidance requires certain internal audit-related documents to be reviewed periodically by the Audit Committee. Historically, the documents are brought to the committee each March. The following charters and policies were discussed:

Internal Audit Charter - The *International Standards for the Professional Practice of Internal Auditing*, requires the chief audit officer to "periodically review the internal audit charter and present it to senior management and the board for approval."

Internal Audit Policy (Policy 1:015) - This university policy addresses the staffing, responsibilities of the internal audit function, audit planning and reporting on internal audit activities.

Preventing and Reporting Fraud, Waste, and/or Abuse (Policy 1:016) - This university policy describes the role of students, contractors and employees in helping prevent fraud, waste and/or abuse of university resources.

Employee Code of Conduct (Policy 5:043) - The Audit Committee Charter requires the committee to review the University's Code of Conduct policy to ensure it is readily available to all employees, easy to understand and implement, enforced, and provides for a confidential means of reporting violations.

Conflict of Interest (Policy 1:001) - The Audit Committee Charter requires the committee to review the University's Conflict of Interest policy to ensure "conflict of interest is clearly defined, guidelines are comprehensive, annual sign-off is required for those in key positions and procedures are in place to ensure potential conflicts are adequately resolved and documented."

Conclusions

This was an information item and required no action.

**Information Item B - Internal Audit Reports released between November 11, 2021, and February 18, 2022, and List of Outstanding Audit Recommendations**

Discussion

Trustee Mealer recognized Clements for a report. Clements discussed two audits completed between November 11, 2021, and February 18, 2022. The Review for Housing and Residence Life was released on February 3, 2022, and the Review of the Payroll Office was released on February 16, 2022.

Clements also explained that the Office of Internal Audit follows up on all recommendations included in internal audit reports, and a summary of outstanding audit recommendations was provided to the committee.

Conclusions

This was an information item and required no action.

**Information Item C – Internal Audit Client Satisfaction Survey Results – Calendar Year 2021**

Discussion

Trustee Mealer recognized Clements for a report. Clements explained that the Office of Internal Audit is committed to a continuous quality assessment and improvement program. This program includes periodically soliciting feedback directly from the clients served about the quality of services provided. At the beginning of each calendar year, the Office of Internal Audit sends a 10-question survey to staff who have had significant interaction with the office pursuant to internal audit engagements for the previous calendar year. The survey responses are anonymous to ensure candid feedback.

A copy of the survey and the results of the calendar year 2021 survey were included in the board materials.

Conclusions

This was an information item and required no action.

**Information Item D – Review of External Audits – Tennessee Department of Military Contract Monitoring Review**

Discussion

Trustee Mealer recognized Clements for a report. Clements explained that the Audit Committee Charter states the committee should review the results of external audits conducted at the university. The Tennessee Department of Military recently

performed a contract monitoring review. This review resulted in no findings of noncompliance.

Conclusions

This was an information item and required no action.

### **Information Item E – Comptroller’s Office Financial and Compliance Audit Report for Fiscal Year 2021**

Discussion

Trustee Mealer recognized Aaron Jewel, audit manager at the Comptroller’s Office, to present the results of the recent annual financial and compliance audit of the university. The report for fiscal year 2021 was issued on January 20, 2022, and stated there were no noted deficiencies in internal controls, no instances of non-compliance that needed to be reported, and the report contained no findings.

Conclusions

This was an information item and required no action.

### **Adjourn**

Discussion

Trustee Atkins moved to adjourn the public portion of the Audit Committee meeting. Trustee Roe seconded the motion.

A voice vote was taken and carried unanimously with five trustees voting yes. The meeting adjourned at 10:26 a.m.



Audit Committee - Executive Session Minutes			
3.18.22		10:29 a.m.	317 College Street Clarksville, TN 37040
Meeting Type	Audit Committee - Executive Session		
Notetaker	Beth Chancellor		
Attendees	Committee Members	Present (Y/N)	
	Brig. Gen. Robin Mealer, Chair	Y	
	Ms. Katherine Johnson Cannata	Y	
	Mr. Mike O'Malley	Y	
	Dr. Phil Roe	Y	
	Mr. Billy Atkins (ex-officio, voting)	Y	
	University Personnel		
	Blayne Clements, Chief Audit Officer	Y	
	Dr. Michael Licari, President	Y	
	Dr. Carol Clark, Secretary to the Board	Y	
	Ms. Dannelle Whiteside, Vice President for Legal Affairs and Organizational Strategy	Y	
Executive Session			
Discussion			
Trustee Mealer called the confidential, nonpublic executive session to order at 10:29 a.m. Trustee Mealer recognized Blayne Clements, chief audit officer, for a discussion of ongoing investigations and reminded the attendees that everything discussed is to be considered confidential and not shared outside the session.			
Adjourn			
Discussion			
Trustee Atkins moved to adjourn the meeting. Trustee Roe seconded the motion.			

A voice vote was taken and carried unanimously with five trustees voting yes. The meeting adjourned at 10:56 a.m.



**Austin Peay State University**  
**Internal Audit Plan**  
**Fiscal Year Ended June 30, 2023**

Type	Area	Audit
Required	FM	President's Expenses 2022
Required	FM	President's Expenses 2023 - Preliminary
Required	AT	Athletic Affiliate 2022
Required	AT	Athletic Affiliate 2023 - Preliminary Work
Required	IS	Internal Audit External Assessment - Prep
Follow Up	FM	State Audit Follow-Up
Management's Risk Assessment	SS	Risk Assessment - Student Affairs
Required	PP	Physical Plant (Carried Forward)
Investigations	IS	Unscheduled Investigations
Follow Up	IS	Internal Audit Follow Up
Consultation	IS	General Consultation
Risk Based	FM	Budgets and Financial Planning
Risk Based	SS	Dining Services
Risk Based	IS	Emergency Preparedness
Risk Based	IS	Office of Equity, Access and Inclusion
Risk Based	FM	Hiring, Onboarding and Termination Process
Risk Based	RS	Grants Administration
Risk Based	AT	Athletic Department

Functional Areas:

AD - Advancement

AT - Athletics

AX - Auxiliary

FM - Financial Management

IA - Instruction & Academic Support

IS - Institutional Support

IT - Information Technology

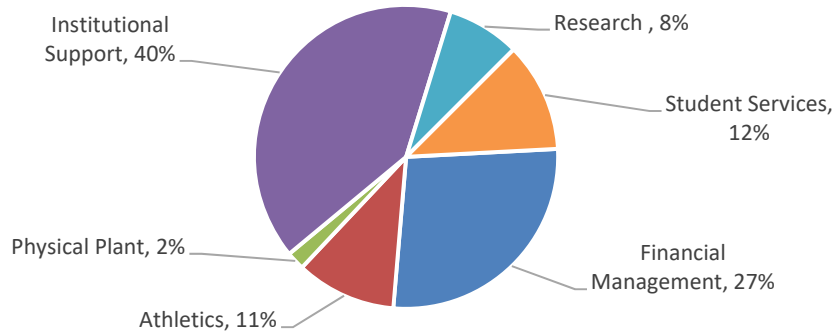
PP - Physical Plant

RS - Research

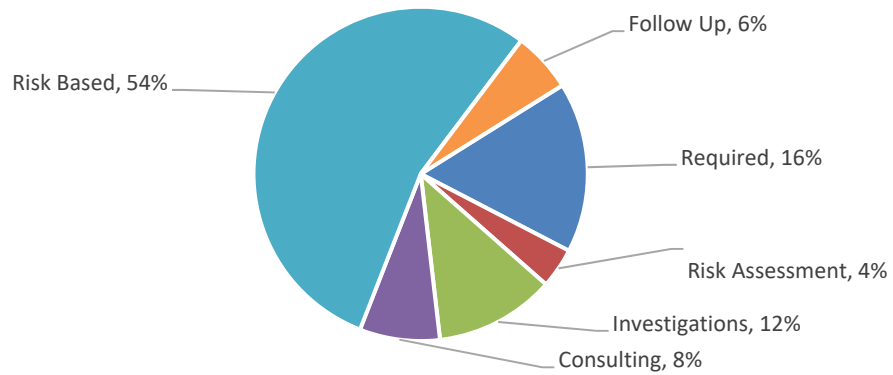
SS - Student Services

Note: The audit universe includes 83 programs, departments or processes.

Internal Audit Plan  
FY2023  
Audit Time By Area



Internal Audit Plan  
FY2023  
Audit Time by Audit Type





## The Office of Internal Audit

### Review of the Provost's Office

October 2021 through January 2022

April 14, 2022

**Restrictions on Report Use:** This report is intended solely for the internal use of the Austin Peay State University Board of Trustees and the management of Austin Peay State University. It is not intended to be, and should not be, used for any other purpose. The distribution of the report to external parties must be approved by Austin Peay State University, Office of Internal Audit, and handled in accordance with institutional policies; however, this report is a matter of public record.



## Internal Audit

April 14, 2022

Dr. Michael Licari, President  
Austin Peay State University  
Clarksville, Tennessee 37044

Dear President Licari,

Enclosed is the internal audit report entitled Review of the Provost's Office. The audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*, issued by the Institute of Internal Auditors.

The audit objective was to conduct a comprehensive review of the Provost's Office. Our review did not result in any recommendation in the report. Other less significant issues were communicated to management but not included in the report.

We would like to thank Dr. Cronley and her staff for their assistance and cooperation during this review.

Please contact me should you have any questions regarding this review.

Sincerely,

A handwritten signature in blue ink, reading 'Blayne M. Clements', with a long horizontal flourish extending to the right.

Blayne M. Clements CIA, CFE, CRMA

CC: Dr. Maria Cronley, Provost and Senior Vice President for Academic Affairs

**Austin Peay State University**  
**Review of the Provost's Office**  
**Internal Audit Report**  
**April 14, 2022**

<b>Key Staff:</b> Provost and Senior Vice President for Academic Affairs	<b>Auditor:</b> Beth Chancellor, CFE
<p><b>Introduction:</b> The Provost's Office is staffed by six regular/full-time employees and provides leadership to the College of Arts and Letters, College of Behavioral and Health Sciences, College of Business, Eriksson College of Education, College of STEM (Science, Technology, Engineering, and Mathematics), and the College of Graduate Studies. The six academic colleges currently offer fifty-three bachelor's degree programs, twenty-two master's degree programs, and two doctoral programs.</p> <p>The Provost's Office also provides leadership to Student Achievement which includes Enrollment Management, the Woodward Library, the Center for Extended and International Education, the Senior Vice Provost and Associate Vice President for Academic Affairs, the Austin Peay Center at Fort Campbell, and the Office of Research and Sponsored Programs.</p> <p>This review focused on the Provost's Office. The academic units and other areas that report to the Provost's Office were not reviewed during this audit but could be reviewed in a departmental audit at a later time.</p>	
<p><b>Objectives:</b> The objective was to review operations of the Provost's Office and provide assurance on a variety of topics, including but not limited to managing:</p> <ul style="list-style-type: none"><li>• Fixed Assets and Equipment</li><li>• Department Payroll</li><li>• Procurement Card</li><li>• System Access</li><li>• Travel</li><li>• Physical Security</li><li>• Compliance Issues</li><li>• Financial Matters</li></ul>	
<p><b>Scope:</b> October 2021 through January 2022</p>	
<p><b>Field Work:</b> The audit included interviewing key staff, reviewing a variety of documents, and performing tests of significant controls.</p>	
<p><b>Results:</b> The results of the review indicate the Provost's Office has adequate controls over operations.</p>	

**APSU - Status Report on Outstanding Internal Audit Recommendations as of May 10, 2022**

Date of report	Recommendation	Responsible Staff	Date Management's Actions to be Implemented	Status of Internal Audit Follow-up	Internal Audit's Conclusion on Management's Actions
1 2/16/2022	Payroll Office  Mangement should ensure aid provided to international students is properly and timely considered for any potential tax considerations.	Assistant Vice President for Finance/ Executive Director of International Education	8/1/2022	Not Yet Due	NA



## COMPTROLLER'S INVESTIGATIVE REPORT

### Austin Peay State University Track and Field and Cross Country

*June 2, 2022*

**Jason E. Mumpower**  
*Comptroller of the Treasury*



**DIVISION OF INVESTIGATIONS**



JASON E. MUMPOWER  
*Comptroller*

June 2, 2022

Austin Peay State University  
601 College Street  
Clarksville, TN 37044

Austin Peay State University Officials:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of the Austin Peay State University Track and Field and Cross Country, and the results are presented herein.

Copies of this report are being forwarded to Governor Bill Lee, the State Attorney General, the District Attorney General of the 19<sup>th</sup> Judicial District, certain state legislators, and various other interested parties. A copy of the report is available for public inspection in our Office and may be viewed at <http://www.comptroller.tn.gov/ia/>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason E. Mumpower".

Jason E. Mumpower  
Comptroller of the Treasury

JEM/MLC



# INVESTIGATIVE REPORT

## Austin Peay State University Track and Field and Cross Country

The Office of the Comptroller of the Treasury investigated allegations of malfeasance related to the Austin Peay State University (APSU) Track and Field and Cross Country athletic programs. The Comptroller's Office initiated the investigation after APSU officials reported possible missing funds from a 2018 Track and Field event hosted by the university. The investigation was limited to selected records for the period from January 2015 through June 2019. The results of the investigation were communicated with the Office of the District Attorney General of the 19<sup>th</sup> Judicial District.

### BACKGROUND



APSU is in Clarksville, Tennessee, and is a public doctoral-level university with over 10,000 students enrolled for the 2020-2021 school year. The APSU Athletic Department supports athletic teams, including Track and Field and Cross Country, that compete in the NCAA Division 1 Ohio Valley Conference.

Between 2015 and 2018, APSU's Track and Field (track) and Cross Country (cross country) teams hosted multiple fundraiser events including: the Austin Peay Governors Invitational, the High

School Classic, the Wilma Rudolph Relay, and the Cross Country Festival. The track and cross country teams charged entry fees of varying amounts to event participants to raise funds for APSU's respective programs. These events were fundraisers for the APSU teams and were not official Ohio Valley Conference events.

Douglas Molnar (Molnar) was the Head Track and Field/Cross Country Coach from September 2004 until June 30, 2019, when APSU chose not to renew his contract.

### RESULTS OF INVESTIGATION

#### **1. FORMER TRACK AND CROSS COUNTRY COACH DOUGLAS MOLNAR MISAPPROPRIATED APSU FUNDS TOTALING \$30,600.45**

During the period January 1, 2015, through June 30, 2018, former track and cross country coach Douglas Molnar misappropriated APSU funds totaling \$30,600.45. Molnar employed the following three schemes to misappropriate funds for his personal benefit without the authority or knowledge of APSU officials:

A. *Misappropriated Fundraiser Event Collections totaling \$29,775*

Molnar misappropriated fundraiser event cash and check collections entrusted to him totaling \$29,775 from both track and cross country fundraiser events for his personal benefit. Participants were charged entry fees to compete in the fundraiser events. Entry fees were turned over to Molnar for deposit into the university's bank account. However, Molnar withheld collections from the 2016 and 2018 Austin Peay Governors Invitational events (\$10,365); the 2015, 2016, 2017, and 2018 High School Classic events (\$12,020); the 2015, 2016, and 2017 Wilma Rudolph Relay events (\$2,200); and the 2015, 2016, and 2017 Cross Country Festival events (\$5,190) and retained the entire amount of \$29,775 for his personal benefit.

Registration information inappropriately instructed participants to make checks payable to Tennessee Athletic Project (TAP) and mail the checks to Douglas Molnar at APSU for the 2015, 2016, 2017, and 2018 High School Classic events. Investigators determined that Molnar established, maintained, and controlled a bank account "Doing Business As" (DBA) Tennessee Athletic Project where some checks were deposited, which enabled him to control and convert the funds for his personal use and benefit. All entry fee payments should have been made payable to APSU and deposited into a designated APSU bank account.

B. *Fraudulent Travel Claims totaling \$600*

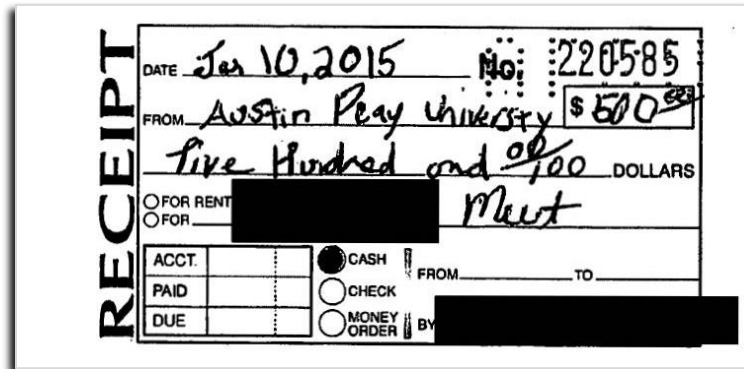
Molnar submitted fabricated receipts, as part of his travel claims to the university, to claim reimbursements for entry fees he purportedly paid totaling \$600, to which he was not entitled, for two separate track events that APSU attended.

1. APSU's track team attended a track meet at a local state university on January 10, 2016. On April 27, 2016, Molnar submitted a travel claim to APSU claiming he paid the team's \$500 entry fee with his personal funds and was due reimbursement. Although Molnar was due a reimbursement, he was only due reimbursement of \$350 – the actual amount of the entry fee he paid. Molnar effectively overstated the amount of his entry fee payment and received an additional \$150 (\$500 less \$350) from APSU to which he was not entitled.

To support his claim of the \$500 entry fee, Molnar submitted to APSU the receipt he allegedly received from the host state university. **[Refer to Exhibit 1.]** However, the receipt that Molnar submitted as documentation appeared to have come from an APSU receipt book since it fell within the same receipt number sequence of other receipts APSU had issued to participants for APSU-hosted events. The event

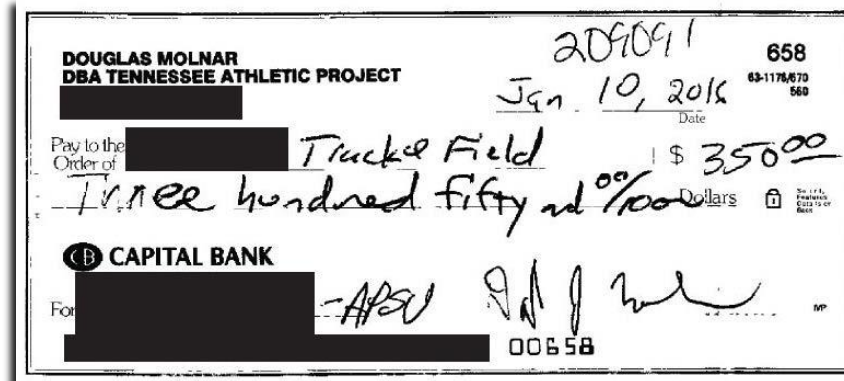
flier for the meet indicated APSU's entry fee was \$350. Additionally, Molnar issued a check from the DBA Tennessee Athletic Project bank account he controlled to cover the \$350 entry fee. [Refer to Exhibit 2.]

**Exhibit 1**



*Copy of fraudulent receipt Molnar submitted in an April 2016 travel claim in which he overstated an entry fee payment to obtain \$150, which he was not entitled.*

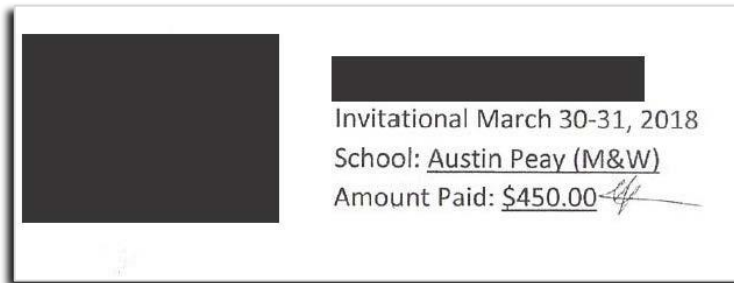
**Exhibit 2**



*Entry fee payment Molnar made to a university for \$350. Molnar was due reimbursement of \$350 from APSU. However, he fraudulently submitted a receipt and claimed reimbursement for \$500.*

2. On March 30-31, 2018, APSU's track team attended an invitational meet in Missouri. On June 25, 2018, Molnar submitted a travel claim for reimbursement of \$450 for the entry fee that he supposedly paid with his personal funds. In fact, there were no entry or other associated fees for the event. Molnar submitted to APSU a fabricated receipt and effectively received \$450 from APSU to which he was not entitled. [Refer to Exhibit 3.]

**Exhibit 3**



*Fabricated receipt Molnar allegedly created for an entry fee payment to obtain a \$450 reimbursement, which he was not entitled.*

Fraudulent Travel Claims	
	Amount
1. Overstated Entry Fee	\$ 150.00
2. Fabricated Receipt for Entry Fee	450.00
<b>Total Fraudulent Travel Claims</b>	<b>\$ 600.00</b>

**C. Diverted Money Order Collection totaling \$225.45**

Molnar diverted a money order totaling \$225.45, intended for APSU, into a bank account he controlled for his personal benefit. APSU had a contract with a vendor to handle concessions at APSU athletic events, including some track fundraiser events. The vendor sold concessions and gave a percentage of the proceeds to APSU. The concessions vendor issued a money order payable to “Austin Peay” on April 4, 2017, three days after the April 1, 2017, High School Classic track fundraiser event. **[Refer to Exhibit 4.]** Instead of turning over the funds for deposit with APSU, on May 24, 2017, Molnar deposited the money order into a bank account he controlled for his personal benefit.

**Exhibit 4**



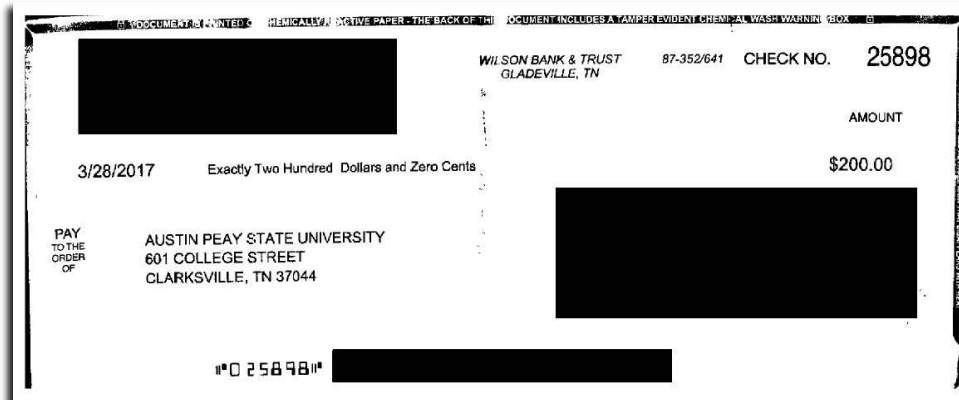
*Copy of money order from concessions vendor intended for the benefit of APSU that Molnar diverted for his personal benefit.*

Summary of Misappropriation	
	Amount
A. Misappropriated Event Collections	\$ 29,775.00
B. Fraudulent Travel Claims	600.00
C. Diverted Money Order	225.45
<b>Total Misappropriation</b>	<b>\$ 30,600.45</b>

## **2. FORMER TRACK AND CROSS COUNTRY COACH DOUGLAS MOLNAR DEPOSITED MISAPPROPRIATED FUNDS TOTALING \$12,695.45 INTO BANK ACCOUNTS HE CONTROLLED**

Molnar deposited \$12,695.45 in misappropriated funds noted in Finding 1. above into bank accounts he controlled for his personal benefit instead of depositing the funds into an APSU bank account. Molnar deposited the misappropriated money order totaling \$225.45 from the concessions' vendor as well as \$12,470 in misappropriated event fundraiser check collections into a joint checking bank account and a "Douglas Molnar, DBA Tennessee Athletic Project" (TAP) bank account he controlled. Twenty-one of the checks he deposited into his bank accounts were made payable to APSU. [Refer to Exhibit 5.] Investigators were unable to determine whether any of the misappropriated entry fee cash collections were deposited into his TAP or other personal bank accounts.

**Exhibit 5**



*Copy of check Molnar deposited into the Tennessee Athletic Project bank account that he controlled for his personal benefit.*



On June 2, 2022, Douglas Molnar entered a plea of guilty by criminal information in the Circuit Court of Montgomery County to the felony offense of Attempted Theft of Property over \$10,000. The Court granted judicial diversion relief, placed the defendant on four (4) years supervised state probation, and ordered him to pay restitution in the total amount of \$30,600.45.

The charges and allegations contained in the criminal information are merely accusations of criminal conduct, and not evidence. The defendant is presumed innocent unless and until proven guilty beyond a reasonable doubt and convicted through due process of law.

[Austin Peay State University Track and Field and Cross Country Investigative Exhibit](#)

## INTERNAL CONTROL AND COMPLIANCE DEFICIENCIES

Our investigation revealed the following deficiencies in internal controls and compliance, some of which contributed to Molnar's ability to misappropriate funds without prompt detection:

**Deficiency 1: APSU officials failed to provide appropriate oversight and accountability over the track and cross country athletic programs**

APSU officials failed to ensure track and cross country fundraiser event collections were turned over for deposit to university accounts and failed to reconcile event collections with amounts deposited. Officials only became aware of a missing track deposit for an event when another university contacted the APSU Accounting Services Department in April 2019, regarding an outstanding check from the 2018 invitational. Failure to reconcile fundraiser event collections allowed the former track coach's misappropriation to go undetected for years. Providing adequate oversight and requiring reconciliations help ensure that all APSU funds are accounted for properly.

**Deficiency 2: The former track and cross country coach failed to account for collections and deposits adequately**

The former track and cross country coach failed to account for fundraiser event collections and did not promptly remit for deposit to university accounts all funds collected at track and cross country fundraiser events. Due to the lack of records of payments received, investigators were unable to determine whether additional proceeds of \$4,140 from event collections were misappropriated. Failure to produce and retain adequate documentation for collections and deposits increases the risk that errors or misappropriations will occur without prompt detection.

**Deficiency 3: The former track and cross country coach failed to issue official prenumbered receipts for all event collections as required by university policy**

The former coach failed to ensure official prenumbered receipts were issued for all collections. University policy for Cash Receipts, page 5, states, “Generally, there are three methods of receipting funds remitted to the University. The first method is a manual receipting process utilizing the University official pre-numbered receipt books, pre-numbered tickets, cash registers or other devices to establish accountability for money received.” The former coach failed to issue official prenumbered receipts for all collections. In some instances, investigators could not find where a receipt was generated at all. In other instances, the former coach issued receipts that had been printed from a computer that contained no receipt number. Officials failed to ensure accountability of track and cross country event collections since they did not verify the coach’s compliance with the university’s receipting policy. Failure to issue official receipts increases the risk that errors or misappropriations will occur without prompt detection.

**Deficiency 4: The former track and cross country coach failed to provide adequate documentation for his travel claims**

On more than one occasion, the former coach fabricated receipts that he purportedly received from other universities and submitted the fabricated receipts to APSU to support his travel claims. In two of these instances, the former coach used the fabricated receipts to fraudulently obtain APSU funds to which he was not entitled. Failure to provide adequate documentation to support travel claims increase the risk that errors or misappropriations will occur without prompt detection.

APSU officials indicated that they have corrected or intend to correct these deficiencies.

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