

**UNIVERSITY OF DENVER**  
**Annual Sub-Certification Disclosure**

**Submit this form to Margaret Henry/Controller, Mary Reed Building, Room 107A.**

I understand that the University prepares annual financial statements subject to an independent audit, and that the Chancellor, Vice Chancellor and Controller must make representations to the independent auditors certifying the accuracy and completeness of the financial statements. In accordance with the University's Corporate Governance and Responsibility Policy 2.10.070, Section II. B. 3, I submit this sub-certification, confirming that I am responsible for the timely and accurate recording of financial transactions initiated within my division.

Certain representations in this letter are described as being limited to matters that are material. The materiality limit of my representations applies to the scope of my University division and does not require me to assess materiality to the University's financial statements. Accordingly, the threshold of materiality for my representations should be based on what a reasonable person would customarily apply to another division comparable to mine.

Except as noted below, I confirm, to the best of my knowledge and belief, the following representations made to you:

1. There are no unasserted claims or assessments that I am aware of. (Unasserted claims and assessments generally arise from an event that has occurred and because of which a third party may subsequently assert a claim or assessment that might result in an unfavorable outcome to the University (e.g., a lawsuit claiming damages or a fine assessed by a governmental agency).)
2. There are no material transactions that have not been properly recorded in the accounting records of the division, specifically:
  - During the fiscal year, the financial records of the division have been reviewed and reconciled on a monthly basis to ensure revenue and expenses are properly recorded. As necessary, correcting accounting entries have been prepared, completed and recorded into the University's financial system.
  - During the fiscal year, all divisional transactions, which record inventory, accounts receivables, pre-paid items, deferred income and accounts payable, are reconciled on a quarterly basis.
  - To ensure the safekeeping of University resources, all cash receipts are:
    - Accounted for and deposited in a timely basis (i.e., at least once weekly);

- The division has procedures in place to properly safeguard cash receipts prior to delivery to the University cashier's office. This would include a secured location with access limited to authorized employees;
  - The division has procedures in place that establish a separation of duties as it relates to cash handling (e.g., the person who prepares the deposit is not the person who reconciles monthly transactions).
- On a monthly basis, all divisional payroll transactions are:
    - Reviewed for accuracy to ensure amounts paid coincide with documented effort, approved pay rate and leave utilized;
    - The division has procedures in place to ensure all employment actions (i.e. hiring, position changes and terminations) are performed on a timely basis in accordance with payroll deadlines;
    - All payroll system transactions are reconciled to the financial system.
3. There are no events that have occurred subsequent to the end of the fiscal year and through the date of this letter that should have been recorded in the accounting records of the division or that would affect a material change in the amounts already included in the accounting records of the division. (One example of the latter would be a recorded pledge that is subsequently deemed uncollectible).
  4. I have no knowledge of any fraud or suspected fraud affecting the division involving management or employees who have significant roles in internal control.
  5. I have no knowledge of any allegations of fraud or suspected fraud affecting the division received in communications from employees, former employees, analysts, regulators, or others.
  6. I and my division have complied with all aspects of laws, regulations, contracts and grants, and University policies, which include:
    - The division has procedures in place to ensure the ordering, receipt, and payment of goods and services have been completed in accordance with the University's procurement policy. (See purchasing manual: <http://www.du.edu/purchasing/policy/> )
    - The division has procedures in place to ensure the University policies regarding the Propriety of Expense and Purchasing Cards have been followed.
    - Any sales subject to state and local sales taxes have been properly recorded into the financial system.
    - The acceptance of credit cards as payment for goods and services is handled in a secure and safe manner, as required by the standards set forth in the Payment Card Industry Data Security Standard (PCI DSS) and University Policy 2.30.070

