DATE: June 30, 2013

TO: Budget Officers

FROM: Craig Woody, Vice Chancellor Business & Financial Affairs

SUBJECT: Annual Sub-Certification Representation

The University’s Corporate Governance and Responsibility Policy 2.10.070 Section II. B. 3. requires all Budget Officers and Division Heads to complete a sub-certification representation on an annual basis. The policy and the sub-certification disclosure are posted on the Business and Financial Affairs web site at http://www.du.edu/bfa/subcertifications.html.

The FY2013 sub-certification representation is attached for your review and signature. Please read the instructions and comply with the signature requirement. If you manage budgets for several units, please print and execute a sub-certification for each unit you manage.

Please note that effective this year there are two separate sub-certification representations, one sent to divisional budget officers and one sent to divisional deans/directors/vice chancellors.

Please return the executed sub-certification form to Margaret Henry/Controller in Mary Reed Room 107A by **August 1, 2013**.

Should you have questions please direct them to the Controller’s Office at extension 12404.

Thank you for your support in strengthening the internal controls of the University.
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:

      o 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/](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
These standards, which relate to the protection and safe handling of credit card information, only apply to divisions that accept credit cards as payment for goods and services.

7. I have disclosed all related party (See University Policy 3.20.060 for the definition of related party) transactions including sales, purchases, loans, transfers, leasing arrangements, guarantees, ongoing contractual commitments and amounts receivable from or payable to related parties.

8. The information, both financial and non-financial, that I have reported to outside entities, including but not limited to accrediting agencies and media organizations, has been accurate.

9. I certify that gift and endowment spending activity is in compliance with donor imposed fund restrictions.

Exceptions, if any, to the above representations have been reported to the division head and are described below (please state “none” if no exceptions are taken to the above representations):

**Annual Sub-Certification Acknowledgement:**

Department Name: __________________________________________

Budget Officer Printed Name: _________________________________

Signature: _________________________________________________

Date: _____________________________________________________

**Exceptions:**