



Board of Regents

Audit Committee
Monday, May 9, 2022 @ 10:00 a.m.
Conducted Via Remote Participation

Meeting Minutes

AUDIT COMMITTEE MEMBERS	PARTICIPATING REMOTELY
Elease Wright, Chair	Yes
Aviva Budd	Yes
Rick Porth	Yes

CSCU STAFF PRESENT:

Ben Barnes, Chief Financial Officer
Melinda Cruanes, Controller
Pam Heleen, Recorder/Assoc. Director of Board Affairs

GUESTS:

Carolyn Kurth, CohnReznick
Claire Esten, Dave Stoffel, Chris Bradford - Grant Thornton

1. CALL TO ORDER

With a quorum present, Chair Wright called the meeting to order at 10:01 a.m.

2. APPROVAL OF JANUARY 20, 2022 AUDIT MEETING MINUTES

With a motion from Regent Budd and a second from Regent Porth, the motion was approved by unanimous voice vote.

3. DISCUSSION ITEMS

A. APA Audit Update - Melinda Cruanes

- The Community Colleges 2018, 2019, and 2020 APA Audits were released on March 16.
- The University and System Office 2019 and 2020 APA Audits were released on March 14.
- All matters in the reports have been discussed with the BOR Audit Committee. The team is currently working to ensure that any future findings are minimized.
- APA is currently working on their 2021 and 2022 audits. Final results are not expected for quite a while.

B. Management Update - Melinda Cruanes

- System Office Accounting has been busy working on the CT State Community College merger, especially the transition of the Banner Financial System. They are moving into a new Banner system for the FY23 College transition year. There should be no affect on the FY22 close.

- GASB 87 and 96 will be implemented this year. GASB 87 is the lease standard which requires that all leases that meet certain criteria are recorded on the balance sheet. There is no longer a distinction between operating and capital leases. GASB 96 is like GASB 87, but for subscription-based information technology arrangements. These arrangements will also have to be brought onto the balance sheet if they meet certain criteria.
 - Implementation of GASB 87 and 96 will require the analysis of every contract that may contain a lease. Because of the size of the portfolio at the colleges, universities, and Charter Oak and to ensure consistency in data extraction, accurate evaluation, and accounting entries for the initial implementation, System Office Accounting has engaged Grant Thornton's Advisory Team to assist in extracting and compiling data from the contracts and POs. They will not be performing calculations for entries.
 - SO Accounting is investigating the purchase of software to maintain the lease and software listings.
 - The decision to implement GASB 96 this year instead of FY23 when it's required was made due to its similarity to GASB 87 and the assistance of Grant Thornton.
 - Regent Wright asked what the size of the project was expected to be. Claire Esten could not estimate what the entry to the balance sheet would be, but between 200 - 300 leases are expected to be included in the implementation. From a financial reporting benefit, the work may help with decisions about whether to purchase or to lease, as well the policies and procedures for entering a financing arrangement.
 - Regent Budd asked if the cost of the leases could be discounted going forward creating a more realistic commercial value. Claire Esten responded that they were and added that the rationale for GASB 87 was to create consistency for US accounting with the rest of the world's process to capitalize the leases.
 - Regent Porth asked if these were new GASB requirements. Claire Esten responded that they were, and the implementation was required, not optional. Regent Porth asked if the 200 - 300 leases were mostly equipment and if so, what type of equipment. Melinda Cruanes responded that about 2/3 of the portfolio was comprised of copiers; other items include real estate leases, postage machines, and embedded leases.

C. 2020 Bond Audit Planning - Carolyn Kurth/CohnReznick

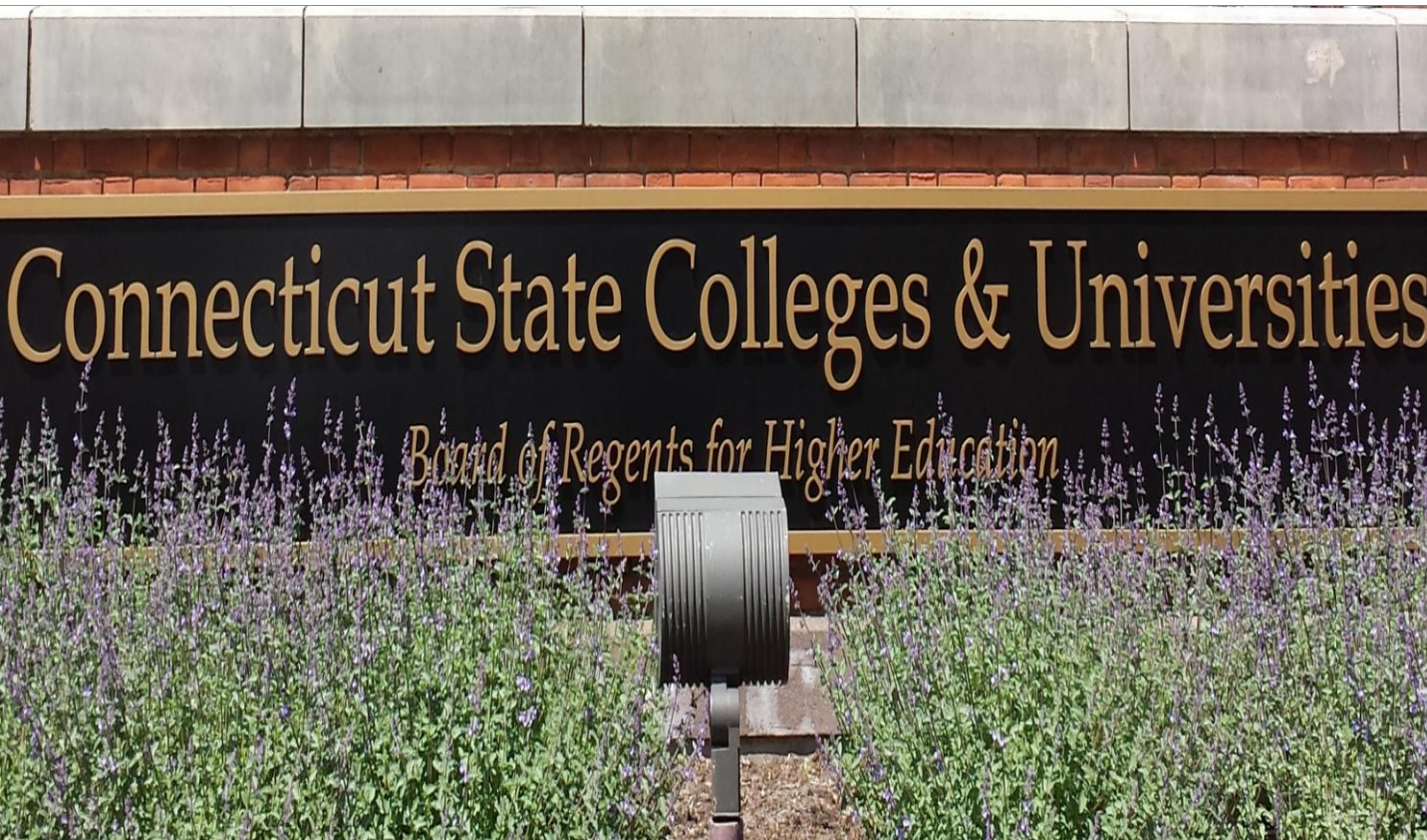
- The full PowerPoint is included as Attachment A. Their presentation focuses on the timetable for the 2020 Construction Audit (page 9).
- Planning started in April and will be very similar to prior years. There will be a slight change this year as field work at a couple of campuses have been swapped.
- Field work begins right after July 4th.
- An initial draft of the schedule and management letter is due in August. Any issues will be noted and brought to management's attention so that corrections can be made before the final draft is completed. Final draft is due in September.
- A change to the overall look of the report is planned this year to place the opinion as the second paragraph, instead of buried in the second page.

D. FY22 Audit Planning Presentation - Grant Thornton

- Claire Esten, Dave Stoffel, and Chris Bradford of Grant Thornton provided an Audit Planning update. Their presentation (Attachment B) focused on:
 - timeline and scope (slide 1)
 - significant risks and other areas of focus (slides 2 - 4)
 - work of other auditors (slide 5)
 - Grant Thornton Advisory and the GASB 87 work (slide 6)
- Claire Esten also commented on the reformatting of the content of the report. The opinion paragraph will be right at the beginning.
- Industry updates and trends in higher education were also discussed (slides 9 - 25).
 - pension funding status - CT was pointed out as one of the states with the worst funded ratio.
 - environmental, social, and government matters (ESG) - something to watch.

4. ADJOURNMENT

On a motion by Regent Budd, seconded by Regent Porth, the meeting adjourned at 10:36 a.m.



Attachment A



Connecticut State Colleges and Universities System

2022 Audit Plan

Presented to:

CT Board of Regents for Higher Education

May 9, 2022



CohnReznick is an independent
member of Nexia International

May 9, 2022

Dear Members:

Thank you for the opportunity to provide professional services to the Connecticut State Colleges and Universities System (“CSCU System”) again this year, an organization we are extremely proud to serve. We are pleased to meet with you today to discuss our plan to perform the audit of the expenditures paid during the year ended June 30, 2022 as reported in the schedule of CSCU 2020 Construction Expenditures - Cash basis (the schedule). This meeting will serve as a forum to validate our understanding of key issues, confirm your expectations, and make certain that our efforts are aligned with your expectations. We welcome your suggestions regarding areas of special concern and ideas to aid us in presenting the most appropriate and valuable reports to you.

Our audit is designed to express an opinion on CSCU System’s 2022 Schedule. We will consider the CSCU System’s current and emerging business needs, along with an assessment of risks that could materially affect the Schedule and design our audit procedures accordingly. Our audit will be conducted with the objectivity and independence that you and the entire Board of Regents expect. Rest assured that our unceasing commitment to quality is and will be reflected in every aspect of our work.

The attached report outlines the scope of our work and key considerations affecting the audit of the 2022 Schedule. If you have questions or comments on this material, please don’t hesitate to contact Carolyn at 959-200-7055.

We look forward to working with you again this year.



Carolyn S. Kurth, CPA, CFE
Director
CohnReznick LLP



COHNREZNICK'S COMMITMENT TO YOU

- To provide forward-thinking solutions, service that exceeds expectations, and create opportunity, value, and trust for our clients, our people, and our communities.
- We will be a firm of excellence and innovation – providing invaluable services and insights to our clients; fostering a workplace culture that develops leaders and values diversity; and working to make our communities better.

Meeting the **challenges**. Providing **value**.

CohnReznick 

SERVICES AND DELIVERABLES TO THE CSCU SYSTEM

Schedule of CSCU 2020 Construction Expenditures – Cash basis	<ul style="list-style-type: none">Express an opinion on the schedule of CSCU 2020 Construction Expenditures – Cash basis (the schedule)
	<ul style="list-style-type: none">Communicate matters in accordance with AU-C 265, “Communicating Internal Control Related Matters Identified in an Audit.
Non-attest services	<ul style="list-style-type: none">Assist in the preparation of the Schedule

KEY MEMBERS OF THE ENGAGEMENT TEAM

Audit Resources

- Paul Ballasy, Not-for-Profit Engagement Partner
- Patricia McGowan, Higher Education Partner
- Carolyn Kurth, Director
- Alexandra Marsh, Manager

AUDIT PLAN CONSIDERATIONS



Understanding and Evaluating Controls

- Review accounting policies and procedures
- Understand internal control documentation and perform walkthroughs of key processes:
 - Cash receipts
 - Cash disbursements
 - Payroll
 - Revenue recognition
 - Journal entries
 - Financial reporting and closing



Significant Risks

- Management override of controls
- Improper recognition of and reporting of project costs and budgets



Key Audit Areas

- Direct Cost | Expenditures
- Labor Costs
- Ensure that the Schedule of Values (SOV) is based on management's original estimates and supported by the budget and bid documents.
- Make sure that the schedule is properly updated for any change order additions or deducts.
- Testing of the approved allocation methodologies utilized on the various projects for appropriate and accurate application.



USE OF TECHNOLOGY

Converge is CohnReznick's preferred method of sharing electronic information with our clients. We leverage Converge to securely and efficiently communicate with our clients. Our portal allows our clients to upload and download documents, share open items, and review project information.



Microsoft Office 365 Email Encryption is CohnReznick's method for sending protected emails to our clients. With this easy-to-use and proven service, our professionals can securely send clients sensitive, personal information, such as personally identifiable information ("PII"), protected health information ("PHI"), and credit card information, as regulated by the Payment Card Industry Data Security Standard ("PCI DSS").



CCH Engagement is a powerful trial balance and engagement workflow tool that not only allows us to automate financial statements, workpapers, and tax return preparation, but also provides the tools to manage and perform our engagements in a completely paperless environment.



WorkFlow enables our professionals to track entire tax processes, from the creation of an electronic tax folder, to the routing of client source documents, to the final delivery of the tax return reports to the client. It gives us convenient access to reports and the ability to easily monitor and manage project workflow.



IDEA data extraction software allows our professionals to gather and analyze financial information from your systems.



GoFileRoom is a Web-hosted document management service that maintains all paper and electronic files in a secure data center, allowing for convenient, 24/7 access from any location. CohnReznick professionals can access all client documents quickly and easily, which results in increased efficiency and quick response times for client requests. Other significant advantages of GoFileRoom include advanced document security and business continuity.



TeamMate Analytics data extraction software allows our professionals to gather and analyze financial information from your systems, aiding in the efficiency of our audit.



Artificial Intelligence Software Tool

CohnReznick uses Leverton, an artificial intelligence software tool, to automatically extract data from documents to create structured data for better data analysis and document management. Leverton is a time-saving platform that uses optical character recognition and data extraction to efficiently consolidate data from disparate sources. Once data is consolidated, it can be validated, accessed, analyzed, and exported.



TIMETABLE OF AUDIT SERVICES

	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT
Audit design and planning							
Planning meeting with audit committee and management							
Year-end field work							
Present draft of the Schedule and if applicable, management letter, to management & audit committee							
Issue Schedule and if applicable, management letter							

RESPONSIBILITIES

Management's Responsibilities*

- The preparation and fair presentation of the Schedule in accordance with the Cash Basis of accounting.
- Designing, implementing, and maintaining of internal controls relevant to the preparation and fair presentation of Schedule that are free from material misstatement, whether due to fraud or error, fraudulent financial reporting, misappropriation of assets or violations of laws, governmental regulations, grant agreements, or contractual agreements.
- Accepting responsibility for nonattest services, including identifying the proper party with the skills, knowledge, and experience to oversee the nonattest services provided.
- Informing us of any known or suspected fraud affecting the entity involving management, employees with significant role in internal control and others where fraud could have a material effect on the Schedule.
- Ensuring the accuracy and completeness of all information provided.
- The audit of the Schedule does not relieve management or those charged with governance of their responsibilities.

Auditor's Responsibilities*

- Communicating with those charged with governance the responsibilities of CohnReznick regarding the audit of the Schedule and an overview of the planned scope and timing of the audit.
- Obtaining from those charged with governance information relevant to the audit.
- Providing those charged with governance with timely observations arising from the audit that are significant and relevant to their responsibility to oversee the financial reporting process.
- Promoting effective two-way communication between the auditor and those charged with governance.
- Communicating effectively with management and third parties.
- Forming and expressing an opinion about whether the Schedule has been prepared by management, with the oversight of governance, are prepared, in all material respects, in accordance with the applicable financial reporting framework.
- Establish the overall audit strategy and audit plan, including the nature, timing, and extent of procedures necessary to obtain sufficient appropriate audit evidence.

**The complete terms of our mutual responsibilities are included in our engagement letter.*

EFFECTIVE ACCOUNTING AND AUDITING UPDATES

Auditing		
Effective Year Beginning Date for the Organization	Auditing Standards Number	Pronouncement Description
Effective	Auditing Standards 134	Auditor Reporting and Amendments, Including Amendments Addressing Disclosures in the Audit of the Schedule.

KEY CHANGES TO THE AUDITOR'S REPORT

Current Auditor's Report

1. A title that includes the word independent
2. Addressee
3. A statement that the financial statements identified in the report were audited
4. Management's responsibility for the financial statements
5. Auditor's responsibility
6. Basis for opinion
7. Opinion
8. Other matters



SAS 134 Changes - Auditor's Report

1. A title that includes the word independent
2. Addressee
3. Opinion and identify the entity and financial statements audited
4. Basis for opinion
5. Going concern (if applicable)
6. Key audit matters (if engaged to communicate key audit matters)
7. Management's responsibility for the financial statements
8. Auditor's responsibility
9. Other matters

SAS 134 - Other Changes:

- Amends AU-C section 260, *The Auditor's Communication With Those Charged With Governance*.
- Expanded description of the auditor's responsibilities
- Clarifies the relationship between Emphasis-of-Matter (EOM) paragraphs and the communication of key audit matters.
- Amends various AU-C sections to focus auditor attention on disclosures throughout the audit process.

PRESENTATION TO THOSE CHARGED WITH GOVERNANCE

2022 Annual Audit Planning Presentation

Connecticut State Colleges and Universities

May 2022

This communication is intended solely for the information and use of management and those charged with governance of CSCU and is not intended to be and should not be used by anyone other than these specified parties.



Audit timeline & scope

April 2022	Client continuance	<ul style="list-style-type: none">• Client continuance• Conduct internal client service planning meeting, including coordination with audit support teams (IT, tax, actuarial)
May/June 2022	Planning	<ul style="list-style-type: none">• Meet with management to confirm expectations and discuss business risks• Issue engagement letter• Discuss scope of work and timetable as well as identify current year audit issues• Initial Audit Committee communications
May/June 2022	Preliminary risk assessment procedures	<ul style="list-style-type: none">• Develop an audit plan that addresses risk areas/identify significant risks & focus areas• Update understanding of internal control environment
June/July 2022	Interim fieldwork	<ul style="list-style-type: none">• Perform walkthroughs of certain business processes and controls• Perform selective substantive testing on interim balances
September-December 2022	Final fieldwork	<ul style="list-style-type: none">• Perform year-end fieldwork procedures• Meet with management to discuss results, including review of draft financial statements, misstatements (if any) and completeness/accuracy of disclosures• Present results to the Audit Committee
Report Issuance date	Deliverables	<ul style="list-style-type: none">• Financial Statements• Listing of unrecorded/recorded misstatements and omitted disclosures (if any)

Significant risks and other areas of focus

The following provides an overview of significant risks and areas of focus based on our risk assessments.

Significant risk	Planned procedures
Management override of controls (presumed fraud risk and therefore significant risk in all audits)	<ul style="list-style-type: none">• Consider the design and implementation of entity-level controls, including information technology controls, designed to prevent/detect fraud.• Assess the ability of the University to segregate duties in its financial reporting, information technology, and at the activity-level.• Conduct interviews of individuals involved in the financial reporting process to understand (1) whether they were requested to make unusual entries during the period and (2) whether they are aware of the possibility of accounting misstatements resulting from adjusting or other entries made during the period.• Perform risk assessment for journal entries and detail test a sample of journal entries based on our risk assessments to ensure propriety of the entries.

Significant risks and other areas of focus (continued)

Area of focus	Planned procedures
Tuition revenue, auxiliary enterprises and related receivables/deferred revenue	<ul style="list-style-type: none">• Obtain an understanding of internal controls over student tuition and fees, including the awarding of federal and institutional aid• Perform reasonableness test on tuition and fees, student aid and auxiliary revenue amounts• Perform detailed testing of a sample of transactions, agreeing to source documentation• Review reserves on aged accounts receivable
Grant revenue and accounts receivable	<ul style="list-style-type: none">• Test a selection of grant receivable and grant deferred revenue balances• Perform detailed transaction testing over grant revenue
Adoption of GASB 87- Lease Accounting	<ul style="list-style-type: none">• Perform detail testing to ensure the completeness of leases considered for implementation• Select a sample of leases included in the population to capitalize and test accuracy of the entries related to those leases• Review management's methodology and journal entries to record the GASB 87 adoption entries

Significant risks and other areas of focus (continued)

Area of focus	Planned procedures
Net Pension and OPEB Liabilities (and related deferred inflows/outflows and pension/OPEB expense)	<ul style="list-style-type: none">• Review management's methodology and journal entries to record pension/OPEB liability and related accounting• Review the reports issued by the Auditors of Public Accounts• Perform testing over the census data used by the actuary
State appropriations	<ul style="list-style-type: none">• Reconcile amounts to the GL, including confirmation of certain amounts with the state
Capital Assets	<ul style="list-style-type: none">• Test a rollforward of capital asset balances• Test additions on a sample basis (if material)
Cash and cash equivalents	<ul style="list-style-type: none">• Confirm all material cash balances, and reconcile confirmed balances to the GL

Use of the work of other auditors

Component

Response

Foundations

Each of the Foundations has a separate auditor. In our auditor's report on each entity's financial statements, we make reference to the audits performed by the other unaffiliated auditors.

Net Pension and OPEB Liabilities
and related accounts

The State engages the State Auditor of Connecticut to perform the audit of the valuation prepared by independent actuaries as part of recording the Net Pension and OPEB Liabilities and related deferred inflows/outflows and pension/OPEB expense. Grant Thornton assesses the qualifications of the APA and takes responsibility for their work.

Independence

Non-audit services

CSCU has engaged GT Advisory to assist with extraction of data from lease agreements to a database to be used as a basis for the entries to be recorded in connection with the adoption of the lease accounting standard (GASB 87).

Risk

GT cannot audit its own work.

Safeguards

Management has project oversight, takes responsibility and will validate a sample of the extractions performed by GT.

Appendix

- 1) Higher education industry trends
- 2) Ethicspoint



Industry updates



S&P's 2022 outlook for the Higher Education sector* has changed to “stable” after four years of “negative”

“Out Of The Woods, But Not Yet In The Clear”

Positive Developments

- Substantial federal emergency funding to higher education provided major fiscal support (over \$152 Billion awarded)
- Record fiscal 2021 investment returns
- Return to campus learning in Fall 2021 with corresponding increase in tuition and auxiliary revenues

Risks to Monitor

- Enrollment pressures from troubling demographic outlook and inflation concerns
- New COVID-19 variants will test effectiveness of health and safety measures
- Gaps in credit quality remain between higher rated and lower rated institutions

Bottom line → higher education sector weathered the unprecedented crisis caused by the COVID-19 pandemic and no S&P rated colleges or universities defaulted on their debt

S&P Outlook Factors, continued

What We're Watching - Not-For-Profit Higher Education



Economic recovery

U.S. economy strengthens, but differentiated rates of recovery lead to disparate economic conditions.



Federal stimulus

Strong support for higher education provides financial flexibility; usage and reporting of funds will span several years.



State budgets

State operating appropriations are generally stable to growing for public universities, bolstered by extraordinary federal aid.



Inflationary pressures

Elevated inflation through 2022 could pressure budget expectations, even as tuition increases resume post-pandemic.



Financial flexibility

More stable state budgets, federal funds, and strong investment returns provide greater financial flexibility.



Enrollment and demand

New variants affecting in-person learning again. With entrance tests optional, applications have increased significantly, skewing selectivity.



Event risk

Cyber security breaches, social unrest, staffing issues, governance scandals, unforeseen economic events, will continue to affect credit in 2022.

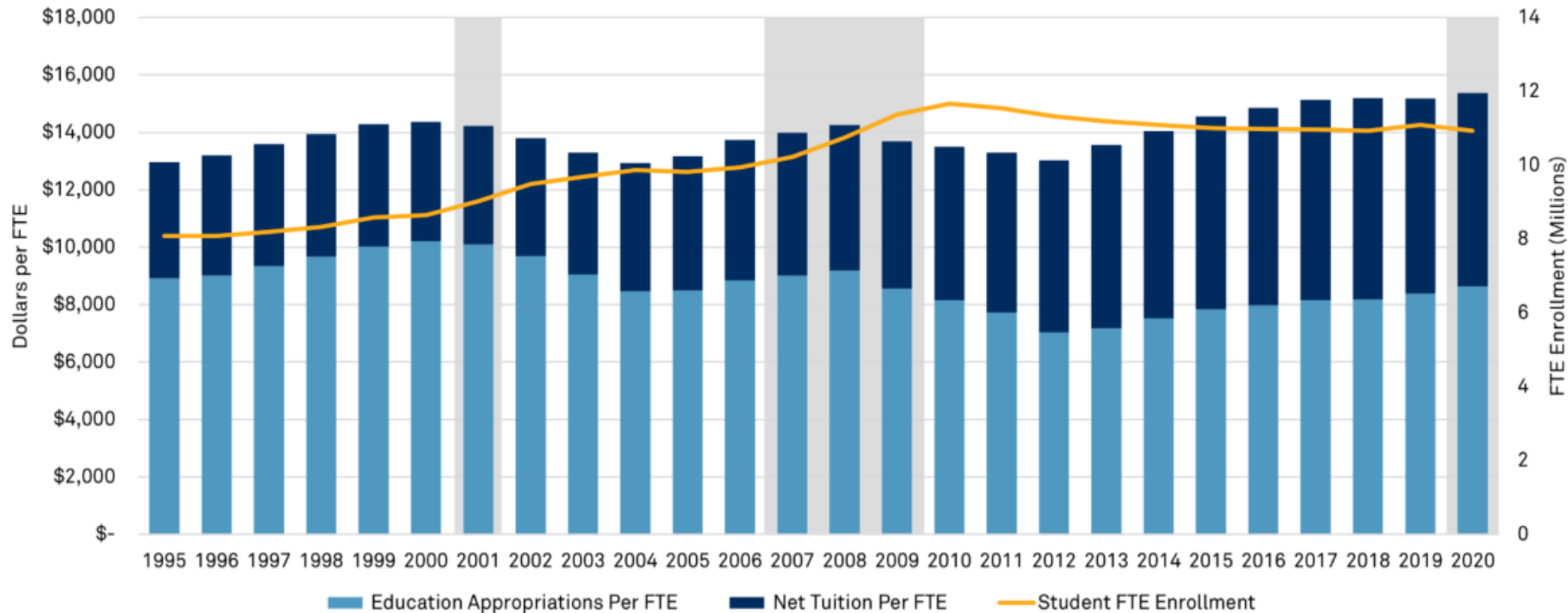


Credit quality bifurcation

There are winners and losers across the industry.

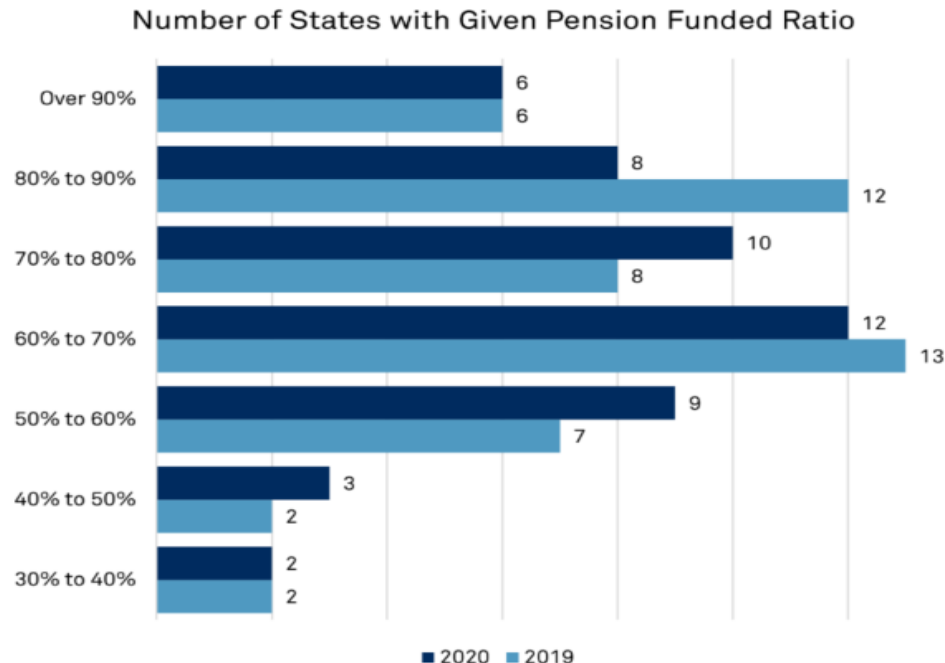
S&P Outlook Factors, continued

State funding and FTE enrollment trends



S&P Outlook Factors, continued

Pension funding status



State	Best 2020 Funded Ratio
Wisconsin	103%
South Dakota	100%
Washington	95.3%
Tennessee	92%
Utah	91.7%

State	Worst 2020 Funded Ratio
Illinois	37.5%
New Jersey	38.4%
Connecticut	43.1%
Kentucky	44.6%
New Mexico	50%

Moody's 2022 outlook for the Higher Education sector* has changed to “stable” from “negative”

“Emergence from remote learning supports revenue growth”

Positive Developments

- Operating revenue projected to rise 4-6% following Fall return to campus
- Record fiscal 2021 investment returns strengthen financial positions and liquidity
- Substantial federal emergency funding to higher education aids rebound

Risks to Monitor

- Inflation and labor shortages will lead to higher costs and lower margins
- Social and cyber risks pose key risks
- Operating budgets for most institutions remained strained

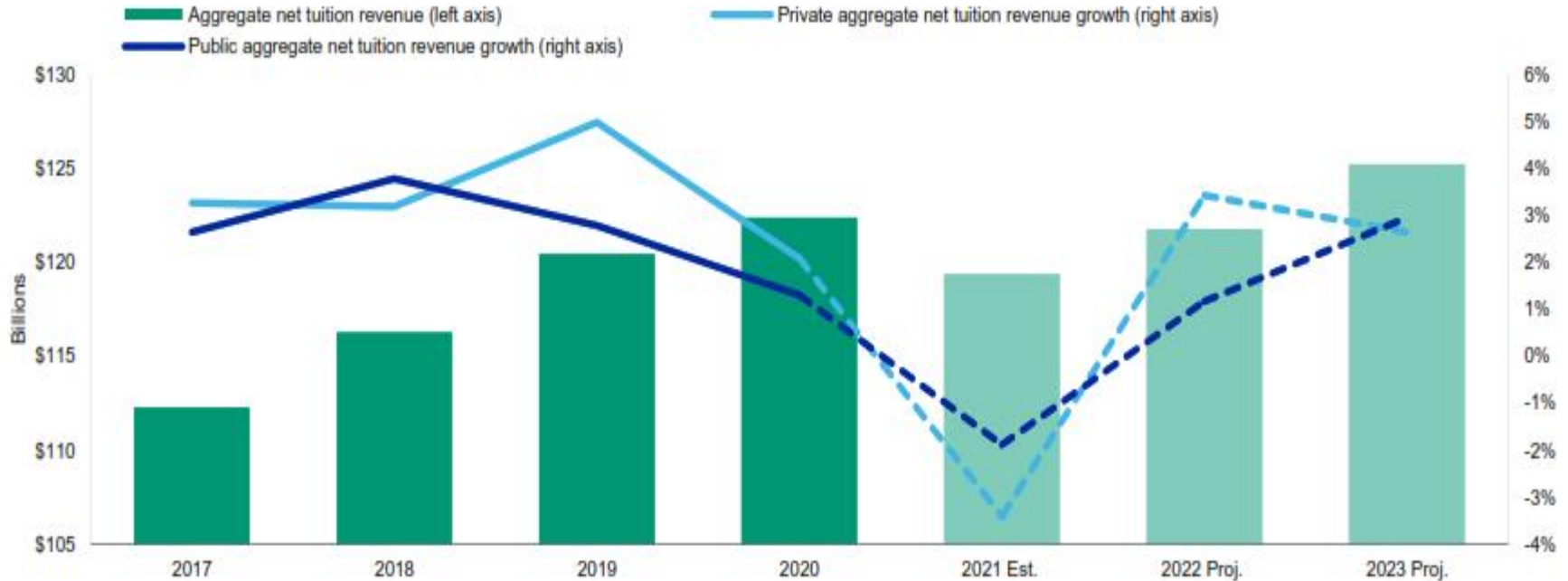
Outlook could turn negative if operating revenue growth falls substantially below inflation, constrained states' tax revenues lead to cuts in state appropriations, or new surges and variants with the coronavirus reverse the resumption of in-person operations.

Moody's Outlook Factors, continued

MOODY'S

Exhibit 3

Net tuition revenue will improve in fiscal 2022, with private universities showing stronger gains



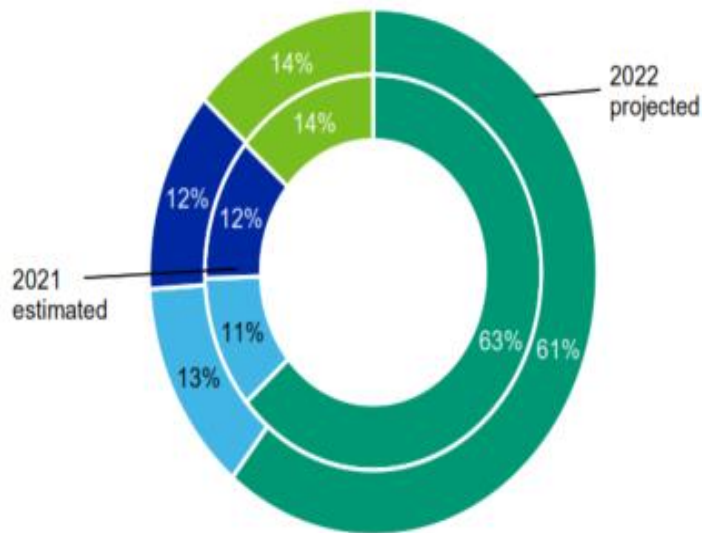
Source: Moody's Investors Service

Moody's Outlook Factors, continued

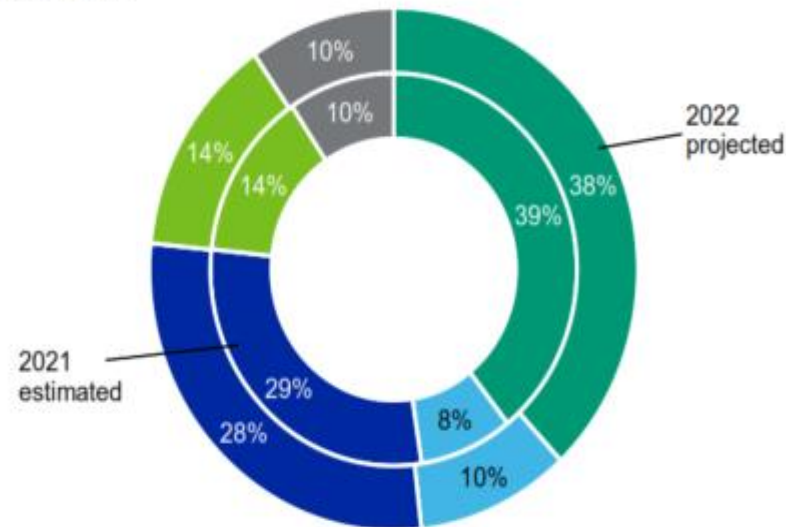
The proportion of auxiliary revenue will climb at private universities...

...and at public universities

■ Net tuition revenue ■ Auxiliary revenue ■ Investment income ■ Other revenue



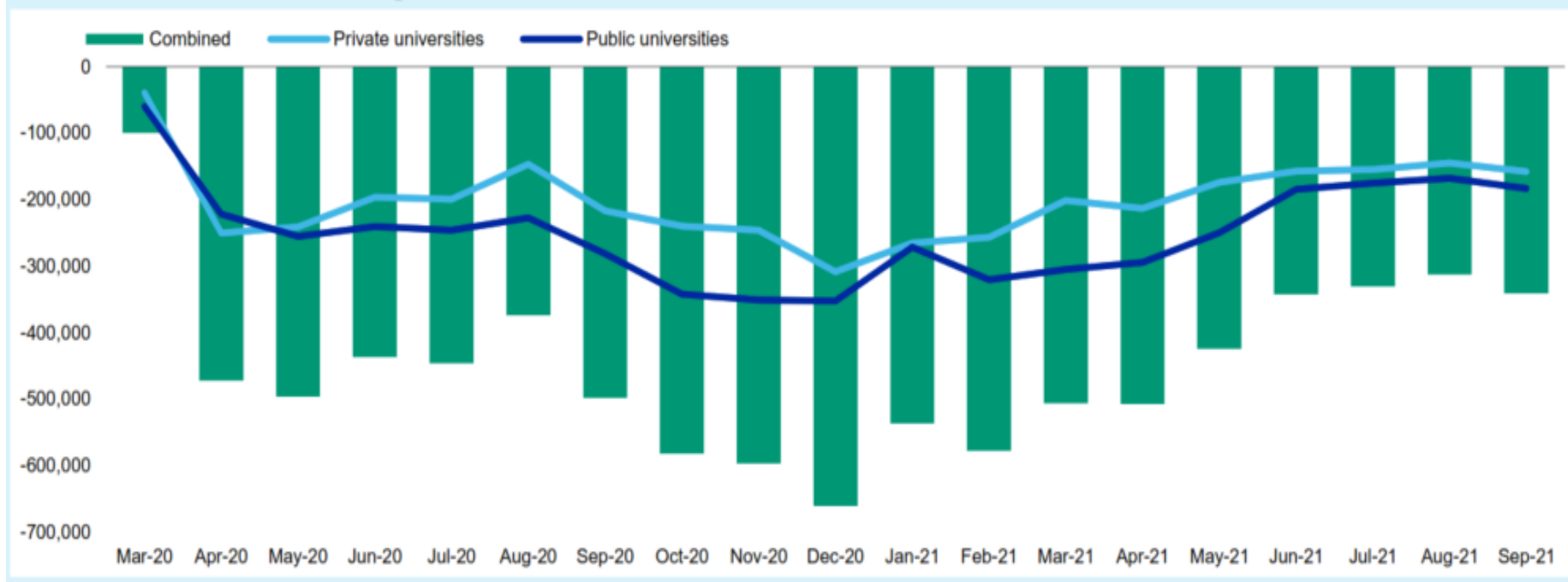
■ Net tuition revenue ■ Auxiliary revenue
■ Government operating appropriations ■ Grants and contracts
■ Other Revenue



Moody's Outlook Factors, continued

MOODY'S

Job losses increased to 14% in higher education in fiscal 2021

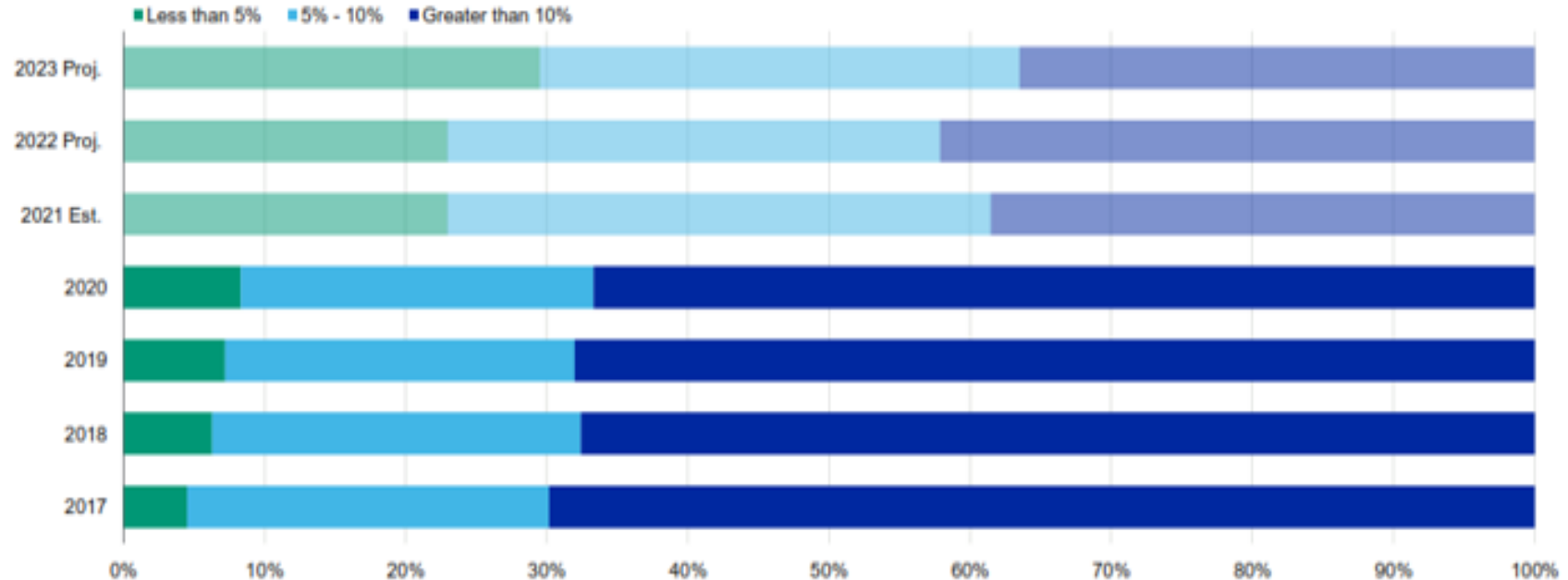


Moody's Outlook Factors, continued

Exhibit 6

EBIDA margins will improve gradually but below pre-COVID levels

Public and private universities



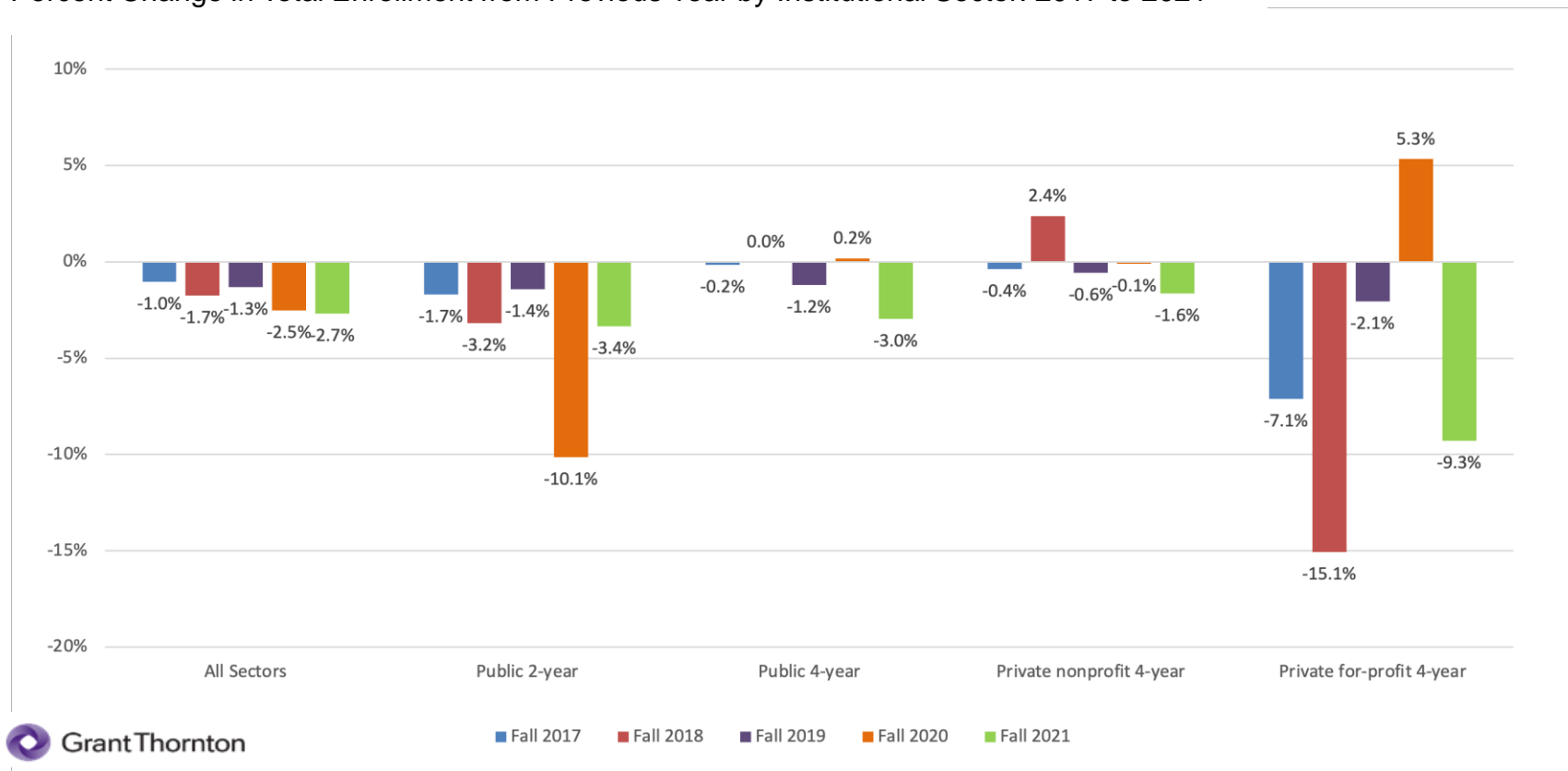
Source: Moody's Investors Service

ESG in Higher Education

- 1) S&P describes how credit ratings will now consider “ESG Factors”
- 2) SEC disclosure requirements related to ESG, will FASB/GASB follow suit?
- 3) Recently the Municipal Securities Rulemaking Board issued a Request for Information (RFI) regarding “disclosures of information regarding ESG-related risk factors and ESG-related practices” and “labeling and marketing of municipal securities with ESG designations”- any colleges/universities that list publicly traded debt securities could be subject to these disclosures in the future
- 4) Donors are paying more attention to **how** nonprofits conduct their work, focused on ESG, rather than simply **what** they do to effectuate mission
- 5) The Association for the Advancement of Sustainability in Higher Education (AASHE) has 1,000+ colleges and universities that participate in the “Sustainability Tracking, Assessment and Ratings System” (STARS) with 600+ in the “good” category (Platinum, Gold, Silver or Bronze), showing progress towards transparency. Maybe future expansion into social and governance metrics could be addressed in the future?

Enrollment Changes – by sector

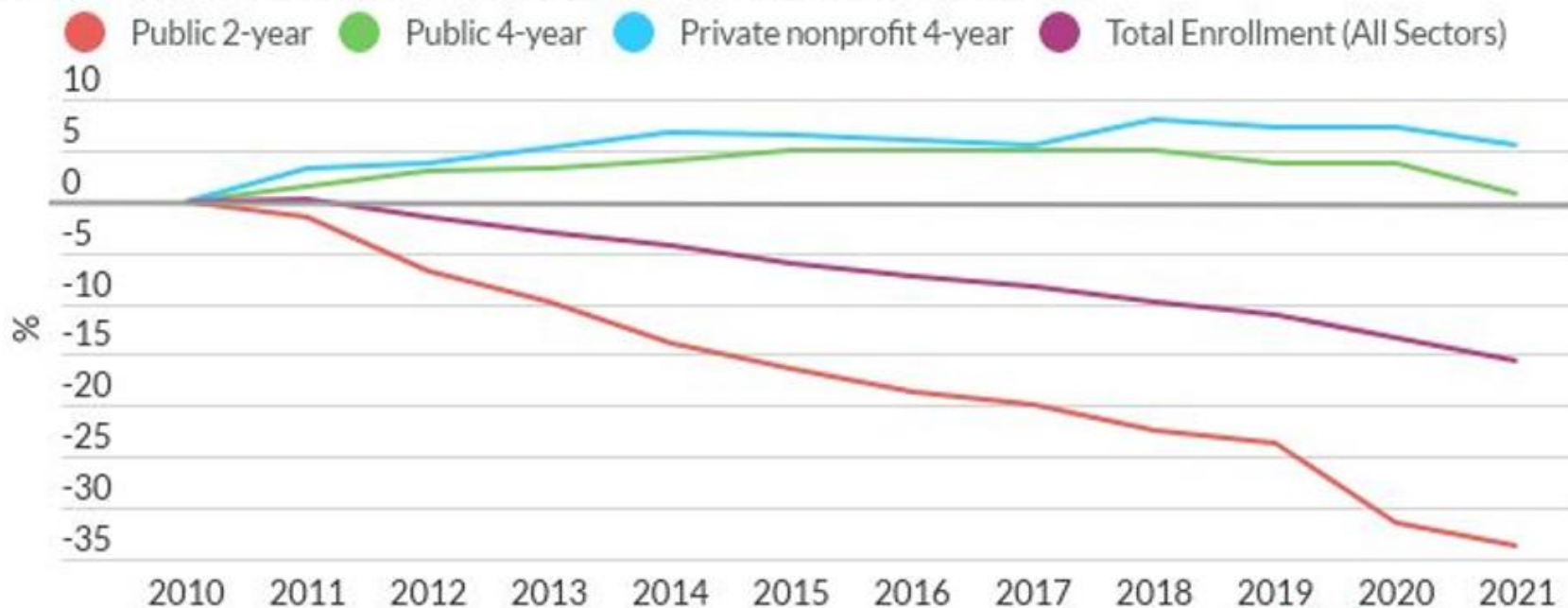
Percent Change in Total Enrollment from Previous Year by Institutional Sector: 2017 to 2021



Enrollment Changes – by sector

Higher Education Cumulative Enrollment

Two-year public colleges have lost a third of enrollment since 2010



Washington Update

- ✓ Pell Award levels:
 - Increased by \$400 to \$6,895 for Academic Year 22-23
 - Biden's FY23 proposed budget includes proposal to increase max Pell award to \$8,670 for 2023-24 Academic Year

- ✓ FASFA Simplification Act implementation deadline extended one year, to be implemented in 2024-25 award year (requires changes to the FAFSA and student aid determinations)

- ✓ Dept of Ed is reviewing rules around Financial Responsibility regulations and focusing on transcript withholding practices of colleges and universities

What presidents are saying:

"Confident my institution will be financially **stable**"

"College Presidents Confident, With an Asterisk"

Over five years...

81%

All institutions "agree" or "strongly agree"

84%

Public universities "agree" or "strongly agree"

78%

Nonprofit private colleges "agree" or "strongly agree"

Over ten years...

77%

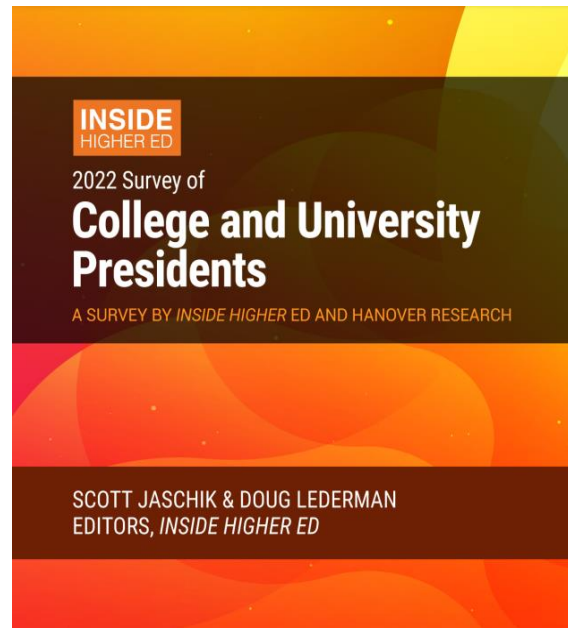
All institutions "agree" or "strongly agree"

76%

Public universities "agree" or "strongly agree"

79%

Nonprofit private colleges "agree" or "strongly agree"



This most recent survey was published in **March 2022**

Quality of courses based on format

How would you rate the overall/average quality of each of the following types of courses being delivered this spring at your institution?

Very poor Poor Fair Good Excellent

In-Person (n=334)



Hybrid (n=319)

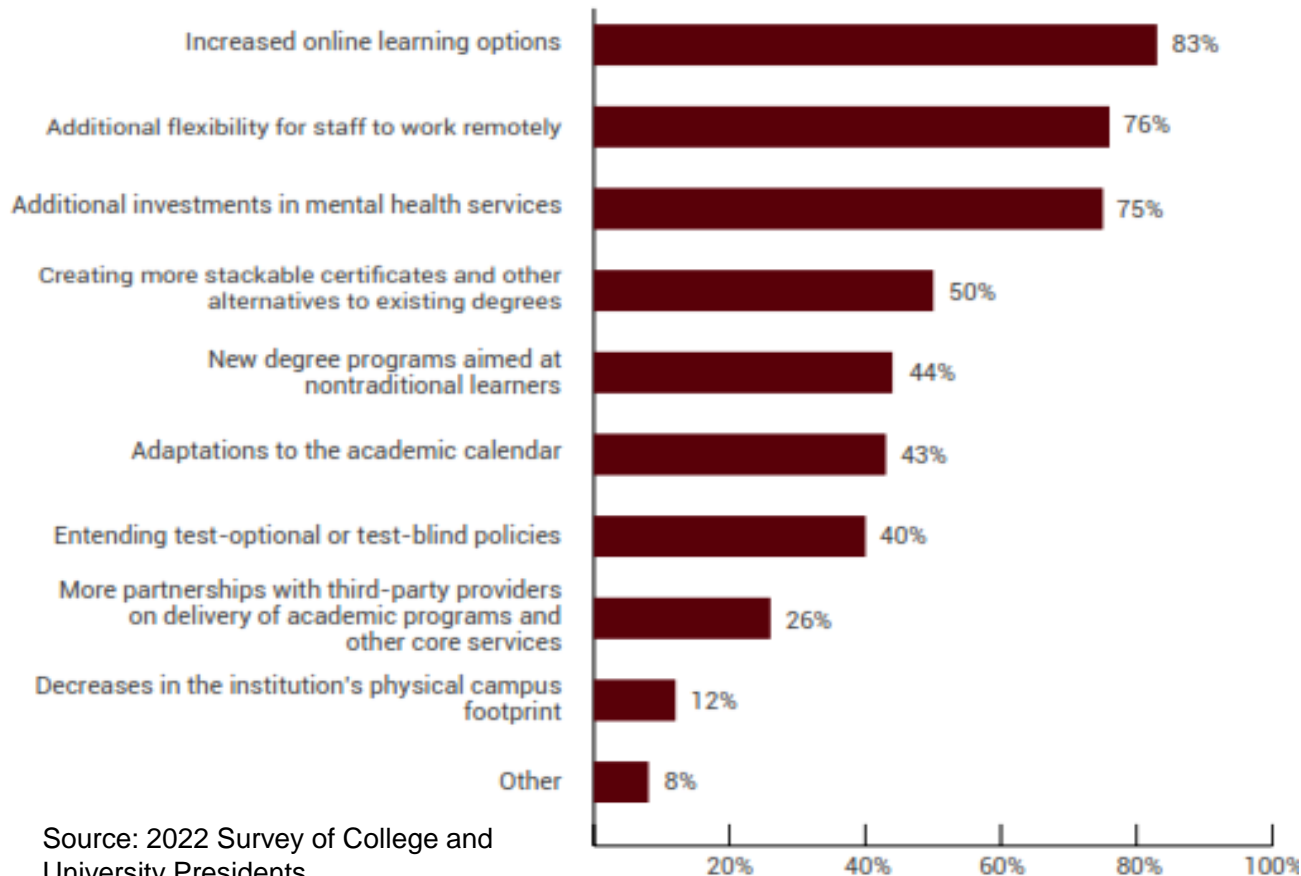


Fully online (n=332)



Changes from the pandemic that institutions plan to keep

Which of the following changes has your institution made because of the pandemic that it plans to keep in the long term? Please select all that apply.
(n=331)



What chief business officers say overall:

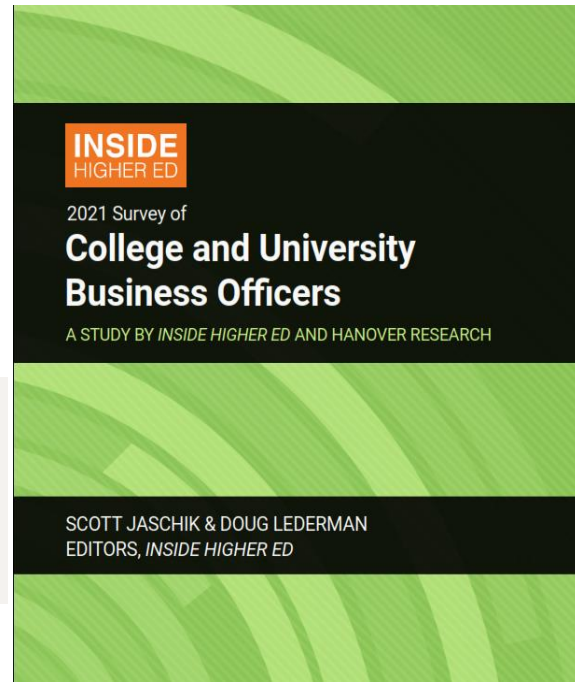
"Confident my institution will be financially **stable over ten years**"

73%
in 2021

53%
in 2020

50%
in 2019

Confidence has increased with a growing split between public (79%) and private (68%) with private baccalaureate colleges having the lowest ten-year confidence at 65% while public doctoral is the highest at 88%.



This most recent survey was completed in **July 2021**

Commitment to promote ethical and professional excellence

We are committed to promoting ethical and professional excellence. To advance this commitment, we have put in place a phone and internet-based hotline system.

The Ethics Hotline (1.866.739.4134) provides individuals a means to call and report ethical concerns.

The EthicsPoint URL link can be accessed from our external website or through this link:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=15191



Disclaimer: EthicsPoint is not intended to act as a substitute for a company's "whistleblower" obligations.