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, Matt McCormick, Chris Bradford, Audit Interns - 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 DECEMBER 16, 2020 AUDIT MEETING MINUTES

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

3. DISCUSSION ITEMS

A. Management Update - Melinda Cruanes

- Year-end processing is going very well for colleges, universities, and Charter Oak.
- A new Director of Accounting for the Colleges has been hired and has been assisting with the year-end and post-closing process.
- The accounting team has been very busy with the complexities of all the COVID-related funding sources and are confident in the timeliness of financials this year.
- The accounting team has been in contact with Foundation management teams for those audits that were delayed last year; they are confident that audited statements will be timely.
- The Magnet School at Manchester, Great Path Academy, will no longer be required to be presented as a component unit in the College’s financial statements.
Overview of some of the GASB 84 and 87 changes that will be coming to the financial statements:
- GASB 84 will be implemented this year and GASB 87 will be implemented for Fiscal 22
- GASB 84 - Fiduciary Activities will require the presentation of the activity of custodial accounts, (i.e., student activity funds) on the face of the statements and in a statement of fiduciary net position and changes in fiduciary net position.
- GASB 87 will require that all leases be recorded on the balance sheet as there is no longer a distinction between operating and capital leases. This will take some time to implement; data and information is being compiled to ensure compliance with this standard next year.

B. APA Audit Update - Ben Barnes

- CFO Barnes provided an update on the audit reports for the colleges and universities conducted by the Auditors of Public Accounts (APA) office:
  - Many Community College findings in the draft report were COVID-related. Staff was unavailable on-site to assist with information gathering. They are working to provide the necessary data to remove the findings.
  - Compensation of college employees for work done on behalf of their Foundation has been identified by the Auditors as an item for review. Staff has identified an Attorney General opinion that permits these arrangements where the foundations are conducting fundraising or other key services under an agreement with the institution; staff is reviewing relationships with each foundation.
  - Findings in HR/Payroll management on campuses (i.e., advertising for positions) are being addressed through the implementation of Shared Services. Procedures will now be consistent across the system.
  - Dual employment issues and a failure to have a written agreement were cited. HR Shared Services is working to establish formality and clarification of issues.
- Generally, organizational changes for the CT State Community College provide opportunities for consistent information, procedures, and transactions.

C. 2020 Bond Audit - Carolyn Kurth/CohnReznick

- There was no formal report.
- Field work has just begun, is totally remote, and is progressing according the agreed upon timeline.

D. Audit Planning Presentation - Grant Thornton

- Claire Esten, Matt McCormick, and Chris Bradford of Grant Thornton provided an Audit Planning update. Their presentation (attached) focused on:
  - timeline and scope (pg. 2)
  - significant risks and other areas of focus (pg. 3 - 4)
  - technology support and cybersecurity (pg. 5)
  - coordination with Foundations (pg. 6)
  - GASB 87 - Leases (pg. 11 - 12)
  - trends in higher education (pg. 14)

4. ADJOURNMENT

On a motion by Regent Budd, seconded by Regent Ryan, the meeting adjourned at 10:53 a.m.
2021 Annual Audit Planning Presentation
Connecticut State Colleges and Universities
July 2021

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.
Your GT Team

Claire Esten
Audit Partner

Matt McCormack
Audit Manager

Chris Bradford
Audit Senior Associate
# Audit timeline & scope

<table>
<thead>
<tr>
<th>April 2021</th>
<th>Client continuance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Client continuance</td>
</tr>
<tr>
<td></td>
<td>• Conduct internal client service planning meeting, including coordination with audit support teams (IT, tax, actuarial)</td>
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<table>
<thead>
<tr>
<th>May/June/July 2021</th>
<th>Planning</th>
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<tbody>
<tr>
<td></td>
<td>• Meet with management to confirm expectations and discuss business risks</td>
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<tr>
<td></td>
<td>• Issue engagement letter</td>
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<tr>
<td></td>
<td>• Discuss scope of work and timetable as well as identify current year audit issues</td>
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<tr>
<td></td>
<td>• Initial Audit Committee communications</td>
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<table>
<thead>
<tr>
<th>May/June 2021</th>
<th>Preliminary risk assessment procedures</th>
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<tbody>
<tr>
<td></td>
<td>• Develop an audit plan that addresses risk areas</td>
</tr>
<tr>
<td></td>
<td>• Update understanding of internal control environment</td>
</tr>
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<td></td>
<td>• Coordinate planning with management and develop work calendar</td>
</tr>
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<table>
<thead>
<tr>
<th>June / July 2021</th>
<th>Interim fieldwork</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>• Perform walkthroughs of business processes and controls</td>
</tr>
<tr>
<td></td>
<td>• Perform selective substantive testing on interim balances</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>September 2021-December 2021</th>
<th>Final fieldwork</th>
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<tbody>
<tr>
<td></td>
<td>• Perform year-end fieldwork procedures</td>
</tr>
<tr>
<td></td>
<td>• Meet with management to discuss results, including review of draft financial statements, misstatements (if any) and completeness/accuracy of disclosures</td>
</tr>
<tr>
<td></td>
<td>• Present results to the Audit Committee</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Report issuance date</th>
<th>Deliverables</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Financial Statements</td>
</tr>
<tr>
<td></td>
<td>• Listing of unrecorded misstatements and omitted disclosures (if any)</td>
</tr>
</tbody>
</table>
### Significant risks and other areas of focus

The following provides an overview of the areas of significant audit focus based on our risk assessments.

<table>
<thead>
<tr>
<th>Area of focus</th>
<th>Procedures</th>
</tr>
</thead>
</table>
| Tuition revenue, auxiliary revenue, and related receivables/deferred revenue ( Significant Risk) | • 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 revenue amounts.  
  • Perform detailed testing of a sample of transactions, agreeing to source documentation.  
  • Perform deferred revenue testing to determine proper cut-off. |
| Grant revenue and accounts receivable | • Test a selection of grant receivable and grant deferred revenue balances.  
  • Perform detailed transaction testing over grant revenue (with a focus on HEERF revenues in FY21) |
| Adoption of GASB 84- Fiduciary Activities | • Discuss potential activities that may meet the criteria of a “fiduciary activity”  
  • Review accounts/activities to determine if exemptions apply  
  • For any activities that meet the criteria, test management’s accounting and disclosures related to fiduciary activities to ensure compliance with new requirements |
### Significant risks and other areas of focus, continued

<table>
<thead>
<tr>
<th>Area of focus</th>
<th>Procedures</th>
</tr>
</thead>
</table>
| **Net Pension and OPEB Liabilities (and related deferred inflows/outflows and pension/OPEB expense)** | • 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**                                                      | • Reconcile amounts to the GL, including confirmation of certain amounts with the State.                                                                                                                      |
| **Capital Assets**                                                            | • Test a rollforward of capital asset balances.  
• Test additions on a sample basis (if material)                                                                                                    |
| **Cash and cash equivalents**                                                 | • Confirm all material cash balances, and reconcile confirmed balances to the GL                                                                                                                              |
| **Management override of controls (presumed fraud risk and therefore significant risk in all audits)** | • 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. |
An important component of our audit approach is to understand how IT is used and deployed in supporting business operations and producing financial reports. Our technology specialists place particular emphasis on the risks relating to the use of technology and its associated controls, processes and practices.

Our general controls review evaluates the design of controls that mitigate risk in areas such as organization and operations, protection of physical assets, application systems development and maintenance, access controls and computer operations.
# Use of the work of other auditors

<table>
<thead>
<tr>
<th>Component</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foundations</td>
<td>Each of the Foundation 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.</td>
</tr>
<tr>
<td>Net Pension and OPEB Liability</td>
<td>Management engages the State Auditor of Connecticut to perform the audit of the valuation prepared by independent actuaries as part of recording the Net Pension Liability and related deferred inflows/outflows and pension expense. Grant Thornton assesses the qualifications of the APA and takes responsibility for their work.</td>
</tr>
</tbody>
</table>
Appendix

1) GASB technical updates
2) Higher education industry trends
3) Grant Thornton thought leadership
4) Ethicspoint
Technical updates - GASB
Selected pronouncements effective for the year ending June 30, 2021 or subsequent periods - GASB

<table>
<thead>
<tr>
<th>Title</th>
<th>Effective date</th>
<th>Effective for CSCU</th>
</tr>
</thead>
<tbody>
<tr>
<td>GASB 84 – Fiduciary Activities</td>
<td>Periods beginning after December 15, 2019**</td>
<td>FY21</td>
</tr>
<tr>
<td>GASB 87 – Leases</td>
<td>Periods beginning after June 15, 2021**</td>
<td>FY22</td>
</tr>
<tr>
<td>GASB 89 – Accounting for Interest Cost Incurred before the end of a Construction Period</td>
<td>Periods beginning after December 15, 2020**</td>
<td>FY22</td>
</tr>
<tr>
<td>GASB 90 – Majority Equity Interests – an amendment of GASB Statements No. 14 and No. 61</td>
<td>Periods beginning after December 15, 2019**</td>
<td>FY21</td>
</tr>
<tr>
<td>GASB 91 – Conduit Debt Obligations</td>
<td>Periods beginning after December 15, 2021**</td>
<td>FY23</td>
</tr>
<tr>
<td>GASB 92 – Omnibus 2020</td>
<td>Periods beginning after June 15, 2021*</td>
<td>FY22</td>
</tr>
</tbody>
</table>

* Effective dates vary by topic.

** Reflective of effective date deferrals under GASB 95.
GASB Statement 84, *Fiduciary Activities*

**Summary**

- Guidance addresses the following:
  - The categorization of fiduciary activities for financial reporting
  - How fiduciary activities are to be reported
  - When liabilities to beneficiaries must be disclosed
- Types of fiduciary funds that must be reported include the following:
  - Pension (and other employee benefit) trust funds
  - Investment trust funds
  - Private-purpose trust funds
  - Custodial funds
- A government controls the assets of an activity if it holds the assets or "has the ability to direct the use, exchange or employment of the assets in a manner that provides benefits to the specified or intended recipients"
- Fiduciary activities must be disclosed in the basic financial statements of the government entity and a statement of fiduciary net position and changes in fiduciary net position should be presented (unless the period of custody is less than three months).

**Potential impact**

Universities often will agree to act as a fiduciary for certain third-party organizations that might be somehow affiliated to the university (such as student clubs, alumni clubs, or other such organizations). Under this new requirement, the University must report the fiduciary activity on its financial statements, where it may not have done so in the past. Management should identify which fiduciary activities it is engaged in to inventory the relationships which may need to be reported. Management may want to consider changing the terms of the relationships such that they are not subject to reporting on the financial statements of the University when the requirement becomes effective.
Summary

• The GASB issued guidance which resembles the FASB guidance on leases
• To determine whether a lease exists, a government should assess whether it has both:
  1) The right to obtain the present service capacity from use of the underlying asset as specified in the contract, and
  2) The right to determine the nature and manner of use of the underlying asset as specified in the contract
• For Lessees:
  • In general, all leases will be reported on the statement of net position (the distinction between operating and capital leases is no longer relevant) as a "right of use" intangible asset and a corresponding lease liability within long term debt
  • On the statement of changes, rent expense will be replaced by amortization expense of the right-of-use asset as well as interest expense on the lease liability (thus accelerating expenses in the beginning years of the lease term)
  • There is an exemption for short term leases (those with a term of 12 months or less, including extension options) as well as leases that transfer ownership at the end of the term
  • Disclosures regarding matters such as total leased assets by major class of underlying assets and related accumulated amortization (in total), principal and interest payments for each of the five subsequent fiscal years and in five year increments thereafter and commitments under leases before a lease commencement period, among other items
Summary, continued

• For Lessors:
  • Record a lease receivable and a deferred inflow of resources equal to the present value of future lease payments (which should generally equal the amount recorded as a liability by the lessee), and also continue to report the leased asset
  • The receivable will be reduce as cash is received, the asset will be depreciated (generally) and the deferred inflow will be recognized over the lease term
  • Disclosures include matters such as general description of leasing arrangements, total amount of inflows of resources, and those related to variable payments, residual guarantees, etc., and the existence, terms and conditions of options by the lessee to terminate the lease or abate payments in certain circumstances, among other disclosures
• Effective for periods beginning after June 15, 2021, with early adoption encouraged. Existing leases will be adjusted based on the remaining lease payments as of the beginning of the period of adoption or beginning of any earlier periods restated (for example, for June 30 year ends, adoption is June 15, 2022 so the beginning period is July 1, 2021).

Potential Impact

• For those universities which use operating leases to finance certain capital activities, this standard could have a significant impact on the financial statements of the University upon adoption. Management should consider the impact on financial covenants, as well as ensuring a complete inventory of existing leases that will be subject to the new accounting and disclosures.
Higher Education industry updates
Moody’s revised 2021* outlook for the Higher Education sector went from “negative” to “stable”

“Improved revenue prospects over the coming 12-18 months”

- Potential return to campus in Fall 2021, bolstering not only tuition and fee revenue, but auxiliary revenue as well
- Federal funding boost
- Steadier outlook for state funding
- Strong investment returns

Possible return to negative outlook if:

- Public health crisis continues
- A deterioration in macroeconomic conditions that threaten state funding and higher education affordability
- Material decline in financial markets

Not all universities will benefit equally; sector continues to face long-term demographic changes and shifts in consumer preferences

* Outlook as of March 2021
Global credit themes affecting Higher Education

Uneven recovery

- State support will vary across the country as states grapple with their own budget issues
- Larger universities with a national draw will fare better than smaller, more regional colleges
- Consumer confidence and the pace of economic recovery will affect where a student attends college

Policy challenges

- Federal higher education policy will be increasingly important over the next several years
- Affordability and accountability will remain in the spotlight at both the state and national levels
- Federal funding priority shifts may limit federally sponsored research growth

Rising debt burdens

- Universities will continue to use a variety of balance sheet tools to mitigate mounting deficits
- The largest universities have moved-up borrowing to take advantage of low interest rates
- Rise in taxable borrowing will likely continue, giving universities greater financial flexibility
Global credit themes affecting Higher Education

- Pandemic has accelerated use of technology in education; students will demand more digital engagement
- Confidence in a university’s digital infrastructure will factor into student choices
- Universities will have to embrace shift toward online teaching to remain competitive
- Sustainability will continue to play a key role in campus infrastructure and investment
  - Wildfires, hurricanes and flooding continue to cause financial and operational disruption for some
- Debate over value offered by higher education will continue
- Universities will focus on offering programs with strong employment outcomes at affordable prices
- Pricing scrutiny means universities may not be able to offset lower state support with tuition increases
Operating revenue declines

Exhibit 1
Revenue will decline in fiscal 2021 with potential for a recovery in the second half of the year
Revenue and expense change with and without patient care

- Annual change in total operating revenue
- Annual change in total operating revenue less patient care revenue
- Annual change in total operating expense
- Annual change in total operating expenses less patient care expenses

E reflects estimate and F reflects forecast
Source: Moody’s investors Service
Enrollment projections remain stagnant

Exhibit 6
Enrollment for traditional-age students will be stagnant over the next decade, particularly in the Midwest and Northeast
% change in enrollment growth indexed to academic year 2000-01

Source: Western Interstate Commission for Higher Education
S&P’s 2021* outlook for the Higher Education sector also remains “negative”

“Many schools were having difficulty meeting enrollment and revenue targets pre-COVID; the pandemic has exacerbated those pressures, and has forced a fundamental shift in business models for all.”

* Outlook as of January 2021
“Limited flexibility in financial operations, enrollment, resources or student draw will most likely weaken credit profiles in 2021 and beyond”
Major decrease in international enrollment

- Multi-year trend in declines of net international students enrolled in the U.S.
- Massive 43% decline in new international students for Fall '20
- One positive would be to see changes to federal visa regulations that increase international enrollment
- International increases could then potentially help offset domestic decreases
Fall 2021-> Major increase in U.S. student applications submitted

- Common Applications reports an increase of 11% nationwide
- The shift by many schools to not requiring standardized test scores is a major factor driving the increase
- Increases are concentrated in the Ivies and other elite privates (for example, as of March 1, 2021, Harvard reports an increase of 42%, SUNY reports a decrease of 17%)

Source: WSJ

Percentage change in Common Applications submitted, 2019-20 to 2020-21

- Private, large, more selective: 20.7%
- Public, large, more selective: 15.5%
- Private, small, more selective: 14.1%
- Public, large, less selective: 13.0%
- Private, large, less selective: 2.2%
- Private, small, less selective: 0.4%
- Public, small, more selective: -0.6%
- Public, small, less selective: -2.1%

Note: Data through March 1. Large schools have 10,000 or more total students. More selective schools have undergraduate admit rates below 50%. Source: Common Application
Washington Update

• Unprecedented federal relief for Higher Education due to COVID19
  ➢ April 2020-> HEERF $14B
  ➢ December 2020-> CRRSAA ("HEERF round 2") $23B
  ➢ March 2021-> ARA nearly $40B
  • At least half will be spent on emergency grants to students
  • Allocation formula similar to formula used for CRRSAA
  • Stated allowable uses are similar to CRRSAA, with two new requirements- institutions must use a portion of their allocation to:
    1) implement evidence-based practices to monitor and suppress coronavirus in accordance with public health guidelines; and
    2) conduct direct outreach to financial aid applicants about the opportunity to receive a financial aid adjustment due to the recent unemployment of a family member or independent student, or other circumstances.

• Higher Education topics expected to be addressed during the Biden Administration
  ➢ Higher Education Act Reauthorization
  ➢ Title IX
  ➢ DACA
  ➢ Comprehensive immigration reform
Trends in pricing

Average Published and Net Prices in 2020 Dollars, Full-Time Undergraduate Students at Private Nonprofit Four-Year Institutions, 2006-07 to 2020-21

While published prices show large increases, net tuition and fees continue to show small increases.
Trends in pricing

Average Published and Net Prices in 2020 Dollars, Full-Time Undergraduate Students at Public Four-Year Institutions, 2006-07 to 2020-21

While published prices show large increases, net tuition and fees show small increases.

Source: The College Board, Trends in College Pricing 2020
Donor giving to higher education experienced a slight increase from 2019

- Fiscal 2020 giving increased 3.6% from 2019 (excluding a $1.8 billion gift to Johns Hopkins University in fiscal 2019)
- Fiscal 2020 saw MacKenzie Scott donate over $860 million to nonprofits, with individual donations of up to $50 million to 35+ colleges and universities, including many historically black colleges and universities including:
  - Borough of Manhattan Community College and Lehman College (City University of New York)
  - Texas A&M International University
  - Clark Atlanta University
  - Howard University
  - Prairie View A&M University
  - North Carolina A&T State
  - Morgan State University
  - Norfolk State University
  - Santa Fe College

Figure 9: Percentage of Institutions Reporting Increased and Decreased Charitable Gift Receipts by Type, 2020

SOURCE: Case.org Voluntary Support of Education Key Findings, 2019-20
Endowment spending up 4% from FY2019

- Institutions spent $23.3 billion from endowments, up 4% from FY2019
- 70% of institutions increased endowment spending; an average increase of about $3.3 million
- Endowments’ average effective annual spending rate in FY2020 was 4.59%, up from 4.36% in FY2019

Source: 2020 NACUBO – TIAA Study of Endowments
Diversity in asset manager selection

- Small minority (6%) of survey respondents report their institution has a formal policy addressing diversity and inclusion related to investment manager selection.
- Leading the way are those institutions with the largest ($1B) endowments (15% responded in the affirmative)

Source: 2020 NACUBO – TIAA Study of Endowments
2021 Top IT Issues in Higher Education

**RESTORE**

1. **Cost Management**
   - Reducing institutional costs and increasing workforce efficiency

2. **Online Learning**
   - Strengthening online and hybrid education

3. **Financial Health**
   - Revising budget models and IT governance

4. **Affordability & Digital Equity**
   - Providing increased support for students' technology needs and enabling technology availability

5. **Information Security**
   - Providing information security leadership

**EVOLVE**

1. **Student Success**
   - Advancing student support services to help students attain academic and career goals

2. **Equitable Access to Education**
   - Providing technologies, support, and policies for diverse users

3. **Online Learning**
   - Progressing from emergency remote teaching to online learning

4. **Information Security**
   - Developing a cybersecurity operations strategy

5. **Financial Health**
   - Partnering to develop new funding sources

**TRANSFORM**

1. **Institutional Culture**
   - Contributing to a culture of transformation

2. **Technology Alignment**
   - Identifying and applying sustainable digital strategies and innovations

3. **Technology Strategy**
   - Developing an enterprise architecture that keeps pace with strategic change

4. **Enrollment & Recruitment**
   - Exploring and implementing creative holistic recruitment solutions

5. **Cost Management**
   - Focusing on digital transformation

**SOURCE:** Educause “Top IT Issues, 2021: Emerging from the Pandemic”
Closed or merged 2016-2020

- 49 closings and mergers 2016-2020
- Moody’s projects closures and mergers to continue to accelerate
Closed or merged in 2016-2020 by region

2020 Closings:
- Holy Family College (WI)
- Urbana University (OH)
- Nebraska Christian College (NE)
- MacMurray College (IL)
- Concordia University – Portland (OR)
- Pacific Northwest College of Art (OR)

2020 Mergers:
- Wesley College (MA)
- School of Architecture at Taliesin (AZ)
- Pine Manor College (MA)
- Robert Morris University (IL)
- Watkins College of Art (TN)
- Martin Methodist College (TN)
Guidance on important emerging developments and challenges

Articles in our 2021 report:

• Navigating the IRS during COVID
• The case for agility in times of turmoil
• Cultural transformation in higher education
• Something old, something new, something borrowed, and something blue
• Social media trends and strategies in the digital age
• New challenges, new solutions: Innovative funding in the private foundation space
• Tomorrow’s working world: Envisioning remote work after COVID
• Driving value creation for nonprofit stakeholders
• Budgeting transformation in higher education
• Caution ahead: The future for higher education administrators, students and faculty
• Is online program management right for your institution?

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Additional resources

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2021 Webcast series

Each year, leaders from Grant Thornton LLP’s Not-for-Profit and Higher Education Practices provide learning opportunities through our webcast series. These sessions cover a wide variety of trending topics and regulatory updates relevant to not-for-profit and higher education management and trustees. We welcome you to visit grantthornton.com/nfp “Upcoming webcasts and events” for more information on upcoming webcasts or to access past webcasts, which are archived for one year.

- Attracting diverse candidates to board and senior leadership positions
  
  FEB 17

- State of the not-for-profit and higher education sectors
  
  MAR 24

- The future of ERM in not-for-profit organizations
  
  MAY 19

- Nonprofit accounting, regulatory and Uniform Guidance update
  
  AUG 11

- Applying a customer lens to measure your nonprofit’s performance
  
  NOV 17

All webcasts are from 1:00-2:30 p.m. CT.

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.