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Legal and Compliance

Responsible Office:  
[University Controller](#)

**Policy Title:**  
Internal Control Program

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This policy item applies to:  
State-Operated Campuses  
Statutory Colleges

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## Summary

Pursuant to the New York State Government Accountability, Audit and Internal Control Act (Act) this policy outlines the State University of New York's (University) formalized program of internal control, which is designed to ensure that the University has a system of accountability for and oversight of its operations and to assist the University in achieving its goals and objectives.

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## Policy

### I. Purpose

The New York State Government Accountability, Audit and Internal Control Act (Act) requires that all state agencies institute a formal internal control program. This system of internal controls is designed to ensure that the University and its campuses meet their mission, promote performance leading to the effective accomplishment of goals and objectives, safeguard assets, provide for the accuracy and reliability of financial and other key data, promote operational efficiency and effectiveness, and encourage adherence to applicable laws, regulations and prescribed policies and practices.

### II. Requirements

The Act requires that all state agencies institute a formal internal control program as outlined in the Division of Budget (DOB) Budget Policy and Reporting Manual Item B-350. The University is required to annually certify compliance with the provisions of the Act to DOB.

### III. Design

The University's internal control program and guidelines incorporate concepts set forth by The Office of the State Comptroller's Standards for Internal Control in New York State Government, and the Committee of Sponsoring Organizations of the Treadway Commission's (COSO) updated version of its report titled *Internal Control – Integrated Framework*. The COSO framework consists of five basic components to internal controls. Each

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component should be present and functioning throughout the system of internal control and referred to when conducting risk assessments. These components are as follows:

- Control environment
  - Risk assessment
  - Control activities
  - Information and communication
  - Monitoring activities
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### Definitions

The following link to FindLaw's [New York State Laws](#) is provided for users' convenience; it is not the official site for the State of New York laws.

Definitions to be used in connection with Duties of the New York State Comptroller, NYS Finance Law §8(2-b) & (2-c) are found in: [NYS Finance Law §§ 2 & 2a](#) (Definitions)

In case of questions, readers are advised to refer to the New York State Legislature site for the menu of [New York State Consolidated](#).

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### Other Related Information

[COSO Internal Control - Integrated Framework](#).

[Standards for Internal Control in New York State Government](#).

SUNY, [SUNY System Internal Controls Website](#).

- [Understanding Internal Controls](#), from the [SUNY System Internal Controls Website](#).
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### Procedures

[Internal Control Program Guidelines](#)

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### Forms

Evaluation templates are available as part of the Internal Control Program Guidelines, [SUNY Procedure, Internal Control Guidelines, Document #7501](#)

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### Authority

[New York State Governmental Accountability, Audit and Internal Control Act, Chapter 814, Laws of 1987, as amended by Chapter 510, Laws of 1999.](#)

State University of New York Board of Trustee Resolutions, No. 96-45, adopted March 25, 1996, No. 89-45, adopted March 22, 1989, and No. 88-80, adopted May 24, 1988.

[State University of New York Board of Trustee Resolutions, No. 14-\\_\\_\\_\\_, adopted June 17, 2014, Approval of Revisions to the State University of New York Internal Control Program.](#)

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### History

- May 14, 2013 – Committee of Sponsoring Organizations of the Treadway Commission (COSO) released an updated version of the Internal Control – Integrated Framework segmenting the five components of internal control into principles and points of focus.
- April 20, 1999 – Chapter 510, Laws of 1999, effective January 1, 1999 amending the provisions of the New York State Governmental Accountability, Audit and Internal Control Act of 1987
- March 25 and 26, 1996 - Board of Trustee Resolution No. 96-45, Approval of Revisions to State University of New York Internal Control Program
- March 22, 1989 – Board of Trustee Resolution No. 89-48, Implementation of the New York State Governmental Accountability, Audit and Internal Control Act of 1987 as it relates to Internal Audit
- May 24, 1988 – Board of Trustee Resolution No. 88-80, Establishment of the Audit Committee of the Board of Trustees
- July 2, 1987 – New York State Governmental Accountability, Audit and Internal Control Act, Chapter 814, Laws of 1987

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## **Appendices**

There are no appendices relevant to this policy.