

# **Kentucky State University**

MANAGEMENT IMPROVEMENT PLAN QUARTERLY REPORT FOR Q2 2024

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### I. BACKGROUND, SCOPE, AND METHODOLOGY

Moss Adams LLP (Moss Adams) was engaged by the Kentucky Council on Postsecondary Education (CPE) to monitor and report on Kentucky State University's (KSU, the University) progress toward implementing its established Management Improvement Plan (MIP). The MIP for KSU was adopted in November 2022. It was designed to assist with organizational and financial stability and includes, but is not limited to, the following elements:

- Policies and Procedures: A comprehensive cataloging and review of KSU policies and procedures to ensure efficiency and compliance with state and federal law
- Salary Ranges: Guidelines for salary ranges and benefits for all faculty, staff, and administrators
- **Board Training:** Mandatory board member training and development, including but not limited to financial oversight and effective committee structure
- Academic Programs: Academic program offerings, course offerings, and faculty productivity guidelines
- **Finance:** Accounting and fiscal reporting systems, collections, budget, and internal controls over expenditures and financial reporting
- Student Success: Student success and enrollment management strategies
- Student Academic Progress: Student academic progress and results
- **Online Programs:** Development of online curricula with the intent of offering bachelor's and master's degrees.

As detailed in the validation summaries throughout this report, each element includes required objectives and associated deliverables. CPE reviewed completed deliverables prior to March 1, 2023, and Moss Adams started reviewing deliverables March 1, 2023. This quarterly report reflects deliverables due during Quarter 2 2024 (October 1, 2023 through December 31, 2023) and all deliverables from prior quarters. Procedures used to assess progress toward completion varied based on the nature of the deliverable.

In this report, each deliverable includes a result of "Implemented," "Partially Implemented," "Not Implemented," or "Undetermined" as defined below:

- Implemented: KSU fully implemented the deliverable as of Q2 2024.
- Partially Implemented: Steps toward implementation were noted as of Q2 2024; however, KSU deliverable exceptions were identified.
- **Not Implemented:** Evidence of implementation or steps toward implementation by KSU were not available as of Q2 2024.
- Undetermined: Implementation could not be determined, or evidence could not be verified.



# **II. VALIDATION SUMMARY**

#### A. ELEMENT 1: POLICIES AND PROCEDURES

Element 1 is related to the need to create a comprehensive catalog and review of University policies and procedures to ensure efficiency and compliance with state and federal law.

| #     | Objective   | Deliverable  | Deadline   | Validation Comments   | Validation<br>Result     |
|-------|---|--|------------|---|--------------------------|
| 1.1.1 | Review all university policies and procedures for compliance with the Policy on Policies.                       | Summative<br>Report  | Q2 FY 2024 | Staff reported the Policy on Policies is in progress.   | Partially<br>Implemented |
| 1.3.1 | Review all policies and procedures and revise for content must be completed by a specific data specific by CPE. | The Gold Book,<br>Bylaws of<br>Kentucky State<br>University<br>Revised Policy            | Q2 FY 2024 | The Gold Book was approved by the KSU Board of Regents (the Board) at the November 28, 2023 Board Meeting.  | Implemented              |
| 1.6.1 | Review all policies and procedures and revise for content must be completed by a specific data specific by CPE. | The K-Book, The<br>Kentucky State<br>University<br>Student<br>Handbook<br>Revised Policy | Q2 FY 2024 | The Behavioral Code of Conduct and the Academic Code of Conduct of the K-Book were approved by the Board at the November 28, 2023 Board Meeting. However, other elements of the K-Book have not yet been updated or separated into their own policy, including: Equal Opportunity/Affirmative Action, Veterans, Americans with Disabilities, Campus Security, Hazing, Medical Amnesty, Pet, Student Organizations, Greek life, and Behavioral Intervention Team. KSU's General Counsel noted the K-Book should be completely revamped so that it is an informational manual rather than a policy. | Partially<br>Implemented |



| #     | Objective   | Deliverable                               | Deadline             | Validation Comments  | Validation<br>Result     |
|-------|---|---|----------------------|--|--------------------------|
| 1.7.1 | Review all policies and procedures and revise for content or elimination on a schedule provided to CPE by KSU, except for those polices listed below, which must be completed by a date specified by CPE.  The Gold Book, Bylaws of Kentucky State University, The Faculty Handbook, Human Resource Policy Manual, The K-Book, The Kentucky State University Student Handbook | Policy review<br>and revision<br>schedule | Q4 FY 2023           | KSU developed a policy review and revision timeline and provided it to CPE. All policies and procedures are scheduled to be reviewed by December 2024.   | Implemented              |
| 1.7.2 | Review all policies and procedures and revise for content must be completed by a specific data specific by CPE.   | Revised Policies                          | Separate<br>Schedule | A separate schedule (Appendix I) for all policies has been developed and departments are working on revising university policies and procedures.  Nine policies, from this schedule were completed and approved by the Board in December 2023 and several policies in the Business Manual have also been approved. | Partially<br>Implemented |
|       |   |   |                      |  |                          |

| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 0          | 1          | 2          |            |            |
| Objectives Partially Implemented | 0          | 0          | 4          |            |            |
| Objectives Not Implemented       | 1          | 0          | 0          |            |            |
| Undetermined                     | 0          | 0          | 0          |            |            |



| Due Later        | 10 | 10 | 5  |  |
|------------------|----|----|----|--|
| Total Objectives | 11 | 11 | 11 |  |

#### **B. ELEMENT 2: SALARY RANGES**

Element 2 is related to the need for guidelines for salary ranges and benefits for all faculty, staff, and administrators.

| #     | Objective   | Deliverable   | Deadline   | Validation Comments   | Validation<br>Result     |
|-------|---|---|------------|---|--------------------------|
| 2.1.1 | Review all currently offered benefits, vacation, sick leave and holiday policies at other Kentucky institutions and ensure competitiveness and consistency. | Summative<br>Report                                 | Q3 FY 2023 | CPE verified that KSU implemented this objective. KSU staff completed a review of benefits in comparison to Kentucky public and peer institutions. The review found that benefits are generally competitive with other Kentucky public institutions, though KSU offers more paid holidays and higher than average vacation leave. | Implemented              |
| 2.1.2 | Review all currently offered benefits, vacation, sick leave and holiday policies at other Kentucky institutions and ensure competitiveness and consistency. | Updated policy<br>and approved<br>paid holiday list | Q1 FY 2024 | KSU completed the review of benefits in comparison to other institutions (see 2.1.1) and submitted the updated HR policy that reflects the revised holiday schedule and the updated approved paid holiday list.   | Implemented              |
| 2.2.1 | Review all positions at the University, including those filled and unfilled, to determine need.   | Summative<br>Report                                 | Q4 FY 2023 | KSU provided restructuring proposals for Student Affairs and Academic Affairs. Moss Adams requested clarification if all positions had been reviewed and if there are any other planned restructures. In addition, Dr. Akakpo is working on updating the organization chart which should be completed in January 2024.            | Partially<br>Implemented |



| #     | Objective  | Deliverable  | Deadline   | Validation Comments   | Validation<br>Result     |
|-------|--|--|------------|---|--------------------------|
| 2.3.1 | Identify positions that should be eliminated or reconstituted to meet the needs of the University.   | Summative<br>Report  | Q4 FY 2023 | Staff reported the process to review staffing levels is expected to be completed in 2024.   | Partially<br>Implemented |
| 2.4.1 | Establish descriptions for all positions including any qualification requirements and an outline of duties and responsibilities.   | Summative<br>Report  | Q4 FY 2023 | Staff reported job descriptions will be completed in January 202. To date, HR provided guidance documents to all employees informing them of this process.  | Partially<br>Implemented |
| 2.5.1 | Establish salary and benefit guidelines for all faculty, staff, and administrator positions using other Kentucky institutions and national peer institutions for comparison. | Contract for salary range and benefit study                                    | Q4 FY 2023 | A contract with Gallagher to complete a total compensation survey was executed. The contractor will consider faculty, staff, and administrative positions with KSU's peer group and regional institutions. The survey is expected to be completed by the end of 2023. | Implemented              |
| 2.5.2 | Establish salary and benefit guidelines for all faculty, staff and administrator positions using other Kentucky institutions and national peer institutions for comparison.  | Summative<br>Report to Include<br>Guidelines                                   | Q2 FY 2024 | Staff reported the summative report and guidelines are expected to be completed after the Gallagher total compensation survey (2.5.1) is completed.   | Partially<br>Implemented |
| 2.7.1 | Establish a master position list and develop protocols for adding and subtracting positions to and from the list.  | Master Position<br>List and<br>Modification<br>Policy                          | Q3 FY 2023 | CPE verified that KSU implemented this objective. A master position list was established, and protocols were developed for adding and subtracting positions to and from the list.   | Implemented              |
| 2.7.2 | Establish a master position list and develop protocols for adding and subtracting positions to and from the list.  | Finalized<br>modification<br>policy including<br>process for<br>regular master | Quarterly  | The protocols for adding and subtracting positions from the master position list are awaiting approval from senior administration. Once the process is finalized, Moss Adams will review the master position list   | Partially<br>Implemented |



| # | Objective | Deliverable             | Deadline | Validation Comments   | Validation<br>Result |
|---|-----------|-------------------------|----------|---|----------------------|
|   |           | position list<br>review |          | compared to quarterly hirings,<br>dismissals, and reassignments on a<br>quarterly basis for at least two<br>quarters. |                      |

| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 3          | 3          | 3          |            |            |
| Objectives Partially Implemented | 3          | 5          | 6          |            |            |
| Objectives Not Implemented       | 1          | 0          | 0          |            |            |
| Undetermined                     | 0          | 0          | 0          |            |            |
| Due Later                        | 6          | 5          | 3          |            |            |
| Total Objectives                 | 13         | 13         | 12*        |            |            |

<sup>\*</sup>Note, objective 2.8.1 was deleted as this objective was similar to objective 2.9.1.



#### C. ELEMENT 3: BOARD TRAINING

Element 3 is related to the need for mandatory board member training and development, including but not limited to financial oversight and effective committee structure.

| #     | Objective   | Deliverable                       | Deadline      | Validation Comments  | Validation<br>Result  |
|-------|---|-----------------------------------|---------------|--|-----------------------|
| 3.1.1 | Complete Association of Governing Boards (AGB) training on Foundational Aspects of Trusteeship.   | Summative<br>Report               | Q3 FY 2023    | CPE verified that KSU implemented this objective. The KSU Board participated in the AGB Foundational Aspects of Trusteeship training in fall 2022.   | Implemented           |
| 3.3.1 | Conduct a review of the current board committee structure as compared to those at peer institutions, as well as best practices for effective university board committees. | Summative<br>Report               | Q1 FY 2024    | The KSU Board discussed its committees and approved the creation of two new committees at its quarterly July 2023 meeting. The Board committees now include: the Executive Committee, the Finance and Audit Committee, the Investment and Advancement Committee, the Academic Affairs Committee, and the Student Engagement and Campus Life Committee. | Implemented           |
| 3.4.1 | Determine the optimal board committee structure and composition and outline the charge of each committee.   | Revised<br>Committee<br>Structure | Q1 FY 2024    | The KSU Board discussed and agreed to changes to the compositions and responsibilities of its existing Board committees at its quarterly July 2023 meeting.  | Implemented           |
| 3.5.1 | Establish an Audit and Compliance<br>Committee and define its relationship to the<br>internal auditor.  | Creation of New<br>Committee      | Q4 FY 2023    | The KSU Board approved the creation of a Finance and Audit Committee at its quarterly July 2023 meeting.   | Implemented           |
| 3.6.1 | Establish a regular meeting calendar annually for both the full board and board committees.   | Calendar                          | Annually – Q2 | The Board approved meeting dates for the next fiscal year. This objective will be evaluated again at Q2 2025.  | Implemented (FY 2024) |



| #      | Objective   | Deliverable                          | Deadline   | Validation Comments  | Validation<br>Result |
|--------|---|--------------------------------------|------------|--|----------------------|
| 3.7.1  | Receive approval of KSU's new board member orientation programs per KRS 164.020(25)(c).   | Orientation<br>Program<br>Curriculum | Q2 FY 2024 | KSU staff reported this program is in progress but there are no new Board members and staff are focused on other priorities before completing this program.  | Not Implemented      |
| 3.9.1  | Make Regent attendance at the annual CPE Trusteeship conference mandatory.  | Board Action                         | Q3 FY 2023 | CPE verified that KSU implemented this objective. The Board took action to state Board member attendance at the annual CPE Trusteeship conference is expected and strongly recommended.                          | Implemented          |
| 3.10.1 | Complete CPE-facilitated training on the history of the University as a state entity that covers its recent financial crisis.       | Training<br>Completed                | Q4 FY 2023 | CPE verified that KSU implemented this objective. The Kentucky Auditor of Public Accounts (APA) report was presented to the Board, which provided the Board with an understanding of KSU's fiscal circumstances. | Implemented          |
| 3.11.1 | Participate in the Association of Governing<br>Boards (AGB)/Gardner Institute Governing<br>Board Equity in Student Success Project. | Participation<br>Confirmation        | Quarterly  | KSU provided documentation confirming participation of two KSU Board members in the Governing Board Equity in Student Success Project.   | Implemented          |
| 3.12.1 | With CPE, develop financial oversight training modules for Regents.   | Training Modules                     | Q1 FY 2024 | Financial oversight training was presented to the Board on November 27, 2023.  | Implemented          |

| Deliverable Status     | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented | 3          | 7          | 9          |            |            |



| Objectives Partially Implemented | 0  | 1  | 0  |  |
|----------------------------------|----|----|----|--|
| Objectives Not Implemented       | 1  | 0  | 1  |  |
| Undetermined                     | 1  | 0  | 0  |  |
| Due Later                        | 11 | 8  | 6  |  |
| Total Objectives                 | 16 | 16 | 16 |  |

#### D. ELEMENT 4: ACADEMIC PROGRAMS

Element 4 is related to the need for academic program offerings, course offerings, and faculty productivity guidelines.

| #     | Objective  | Deliverable  | Deadline   | Validation Comments   | Validation<br>Result |
|-------|--|--|------------|---|----------------------|
| 4.1.1 | Utilizing Gray Associates PES+ Market system and Institutional Research data: Evaluate the viability of all current academic programs.   | Summative<br>Report  | Q3 FY 2023 | CPE verified that KSU implemented this objective. KSU conducted an evaluation of its current program portfolio in collaboration with CPE. As part of this effort, Gray Associates completed a Program Portfolio Analysis that included analysis of KSU's current programs and potential new programs. | Implemented          |
| 4.1.2 | Utilizing Gray Associates PES+ Market system and Institutional Research data: Close low-performing programs (as defined by CPE) and those not aligned with the University's mission. | Suspend<br>programs with<br>plan to close in<br>CPE program<br>inventory and<br>teach out plan | Q4 FY 2023 | Staff provided documentation that indicated the low-performing programs were suspended for close out in five years.   | Implemented          |
| 4.1.3 | Utilizing Gray Associates PES+ Market system and Institutional Research data:  | Summative report and performance   | Q4 FY 2023 | The viability of dual-credit programming was assessed as part of KSU's Program Market Assessment. Staff provided a report and   | Implemented          |



| #     | Objective  | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result |
|-------|--|--|------------|--|----------------------|
|       | Evaluate the costs/benefits of dual credit programs.   | improvement<br>plan  |            | implementation plan detailing the plan to establish the Kentucky State University Dual-Credit Thorobred Academy.   |                      |
| 4.1.4 | Utilizing Gray Associates PES+ Market system and Institutional Research data: Evaluate potential new program offerings aligned with the University's mission and supported by market demand.           | Summative<br>report and<br>proposal<br>development<br>plan     | Q4 FY 2023 | The Program Market Assessment Workshop noted above under objective 4.1.3 also resulted in identification of new program opportunities. KSU is using the Gray report as the proposal development plan for new programs.   | Implemented          |
| 4.5.1 | Facilitate a curriculum complexity discussion and streamline course offerings and programs: Utilize an evaluation tool, such as Curricular Analytics, to determine the efficiency of each degree plan. | Summative<br>report and<br>Program<br>Modification Plan        | Q2 FY 2024 | KSU staff reported the University uses<br>Courseleaf curriculum inventory<br>management system to support<br>course offerings, but it is unclear how<br>or if this system is being used as an<br>evaluation tool.  | Undetermined         |
| 4.7.1 | Facilitate a curriculum complexity discussion and streamline course offerings and programs: Ensure alignment of course program plans with CPE's Academic Program Inventory and degree plan site.       | Summative report and inventory/site updates                    | Q4 FY 2023 | Staff reported CPE's Academic Program Inventory and degree plan site were updated, but no supporting documentation was provided for validation.  | Undetermined         |
| 4.9.1 | Evaluate course offering schedules and program degree plans to maximize efficiency and promote retention, progression and graduation.  | Summative<br>report and<br>updated course<br>offering schedule | Q1 FY 2024 | Staff provided the summative report and course offerings for Spring 2024 through Summer 2024, which shows courses were evaluated to maximize efficiency with the elimination of 150 courses while also promoting progression toward graduation with offerings of certain classes in the summer or winter when needed and ensuring all necessary classes for each degree are offered. | Implemented          |



| #      | Objective   | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result     |
|--------|---|--|------------|--|--------------------------|
| 4.10.1 | Evaluate and improve the Credit for Life process to include a consistent evaluation, documentation and awarding of academic credit.   | Summative<br>report and Policy<br>update and<br>training | Q2 FY 2024 | No documentation or update was provided.   | Not Implemented          |
| 4.11.1 | Review educator preparation programs and redesign them to provide culturally responsive teaching, improve the K12 pipeline, meet market demands, and address teacher shortages, particularly among teachers of color. | Posted RFP and contract awarded                          | Q4 FY 2023 | Staff reported a request for proposal (RFP) was posted to achieve this objective, but it did not yield a suitable provider. Staff are working with CPE to determine next steps.                    | Partially<br>Implemented |
| 4.12.1 | Determine the number of faculty needed in each program area based on revised program offerings and high-demand degree programs.   | Summative report   | Q4 FY 2023 | Staff reported they will discuss next steps for this objective soon.   | Not Implemented          |
| 4.13.1 | Determine appropriate class sizes, approval processes, and pay structures for faculty overload and adjunct faculty in conjunction with the previously described salary band study.                                    | Summative<br>report and<br>updated HR<br>policy          | Q4 FY 2023 | Staff reported appropriate class sizes, approval processes, and pay structures for faculty overload and adjunct faculty have been determined, but a supporting updated HR policy was not provided. | Partially<br>Implemented |
| 4.17.1 | Evaluate the curriculum for all non-educator preparation programs.  | Posted RFP and contract awarded                          | Q4 FY 2023 | Staff reported an RFP was posted to achieve this objective, but it did not yield a suitable provider. Staff are working with CPE to determine next steps.  | Partially<br>Implemented |

| Deliverable Status     | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented | 1          | 4          | 4          |            |            |



| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Partially Implemented | 6          | 4          | 4          |            |            |
| Objectives Not Implemented       | 1          | 1          | 2          |            |            |
| Undetermined                     | 1          | 1          | 2          |            |            |
| Due Later                        | 9          | 8          | 6          |            |            |
| Total Objectives                 | 18         | 18         | 18         |            |            |

#### **E. ELEMENT 5: FINANCE**

Element 5 is related to the need for accounting and fiscal reporting systems, collections, budget, and internal controls over expenditures and financial reporting. The finance section includes separate tables with recurring quarterly and annual objectives.

| #     | Objective   | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result     |
|-------|---|--|------------|--|--------------------------|
| 5.1.4 | Evaluate and revise internal budgetary controls and provide a quarterly budget to actual report to the Board of Regents.  | Audit of all contracts to determine institutional need   | Q1 FY 2024 | Staff provided evidence that two contracts were terminated and reported a comprehensive review of remaining contracts is forthcoming. KSU's new budget director is working on this process.  | Partially<br>Implemented |
| 5.2.1 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Issue RFP and award a contract for accounting services to assist in the addressing ongoing accounting issues | Q3 FY 2023 | CPE verified that KSU implemented this objective. In late 2022, KSU entered into a contract with Your Part-Time Controller (YPTC). The vendor provides supplemental accounting services, as well as budgeting and forecasting services, allowing KSU to address ongoing accounting issues directly tied to improving the accounting and reporting systems. | Implemented              |



| #     | Objective   | Deliverable   | Deadline   | Validation Comments   | Validation<br>Result     |
|-------|---|---|------------|---|--------------------------|
| 5.2.6 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Revise and<br>update Business<br>Procedures<br>Manual                                       | Q2 FY 2024 | KSU staff reported they are in the process of revising Business Procedures. The Board approved several policies including the Policy on Deposits, Policy on Disbursements, Contract Management Policy, Space Management Policy, Ethics Hotline Policy, and the Collections Policy at the November 2023 Board Meeting. | Partially<br>Implemented |
| 5.3.1 | Outsource or co-source the internal audit function and reinstate the externally managed tip line.   | Award contract<br>for internal<br>auditing services   | Q3 FY 2023 | CPE verified that KSU implemented this objective. KSU entered into a contract with Century Business Services, Inc. (CBIZ) for internal audit services in November 2022. Kentucky's Government Contract Review Committee approved the contract on November 9, 2022.  | Implemented              |
| 5.3.2 | Outsource or co-source the internal audit function and reinstate the externally managed tip line.   | Adopt audit plan for internal audit   | Q3 FY 2023 | CPE verified that KSU implemented this objective. CBIZ has created an internal audit plan, which is currently being implemented.  | Implemented              |
| 5.3.4 | Outsource or co-source the internal audit function and reinstate the externally managed tip line.   | Create external<br>tip line policy<br>and procedure   | Q1 FY 2024 | The Board approved the Ethics Hotline (Tipline) Policy at the November 2023 Board Meeting.  | Implemented              |
| 5.3.5 | Outsource or co-source the internal audit function and reinstate the externally managed tip line.   | Update KSU's website to make the hotline more easily accessible to employees and the public | Q1 FY 2024 | KSU's website has been updated to include the tipline information.  | Implemented              |



| #     | Objective   | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result |
|-------|---|--|------------|--|----------------------|
| 5.3.7 | Outsource or co-source the internal audit function and reinstate the externally managed tip line. | Provided training on the tip line and related policies and procedures to the entire organization | Q2 FY 2024 | The Ethics Tipline policy was approved at the November 28, 2023 Board meeting. Staff sent out a campus wide email informing employees about the tipline.                                     | Implemented          |
| 5.4.1 | Implement a formal accounting and reporting framework for endowment distributions.                | Review endowment agreements and execute new agreements where needed                              | Q4 FY 2024 | KSU provided all endowment agreements and the Endowment Investment and Spending Policy was approved by the Board at the December 18, 2023 Board Meeting.                                     | Implemented          |
| 5.4.2 | Implement a formal accounting and reporting framework for endowment distributions.                | Correct<br>accounting for<br>prior withdrawals<br>in 2019 and<br>2020                            | Q4 FY 2024 | KSU provided the monthly endowment journal entries, which were appropriately approved.   | Implemented          |
| 5.4.3 | Implement a formal accounting and reporting framework for endowment distributions.                | Correct accounting structure for endowment accounts  | Q4 FY 2024 | KSU provided the full list of endowments and Moss Adams verified the chart of accounts for endowments encompasses all endowments.  | Implemented          |
| 5.4.4 | Implement a formal accounting and reporting framework for endowment distributions.                | Correct<br>endowment<br>reporting on FY<br>2021 and FY<br>2022 financial<br>statements           | Q4 FY 2024 | KSU's 2021 Financial Audit includes the corrected endowment reporting and states this correction resolves the prior audit finding so the 2022 Financial Audit does not need to be corrected. | Implemented          |



| #     | Objective  | Deliverable   | Deadline   | Validation Comments  | Validation<br>Result     |
|-------|--|---|------------|--|--------------------------|
| 5.4.5 | Implement a formal accounting and reporting framework for endowment distributions.   | Review and update endowment investment policy                   | Q4 FY 2024 | The Endowment Investment & Spending Policy was approved by the Board at the December 18, 2023.   | Implemented              |
| 5.4.6 | Implement a formal accounting and reporting framework for endowment distributions.   | Conduct a review of endowment manager performance               | Q1 FY 2024 | Cerity Partners presented their review of endowment manager performance at the November 28, 2023 Board meeting.  | Implemented              |
| 5.5.3 | Improve the collection of student accounts receivable, including implementation of a comprehensive Student Financial Responsibility Agreement and utilization of external collection agencies, including Kentucky's Department of Revenue. | Executed<br>Student<br>Financial<br>Responsibility<br>Agreement | Q4 FY 2023 | The Student Financial Responsibility Agreement has been updated and approved by the Board. KSU has engaged the Keys to Recovery collection agency to collect outstanding student balances. | Implemented              |
| 5.5.4 | Improve the collection of student accounts receivable, including implementation of a comprehensive Student Financial Responsibility Agreement and utilization of external collection agencies, including Kentucky's Department of Revenue. | Revised collection policy                                       | Q4 FY 2023 | KSU provided the Board-approved Collection Policy which outlines the payment guidelines for students and the collection process.   | Implemented              |
| 5.6.1 | Complete a comprehensive review of expenses to ensure they are charged to the correct functional area and that costs are appropriately allocated to grants and auxiliary units.  | Revised chart of accounts                                       | Q4 FY 2023 | Staff reported the chart of accounts is being revised and is pending the new university organizational structure.  | Partially<br>Implemented |
| 5.6.2 | Complete a comprehensive review of expenses to ensure they are charged to the correct functional area and that costs   | Summative report on   | Q4 FY 2023 | KSU provided a summative report on the process of reviewing account  | Implemented              |



| #      | Objective  | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result     |
|--------|--|--|------------|--|--------------------------|
|        | are appropriately allocated to grants and auxiliary units.   | account revisions  |            | revisions that appeared to be complete and reasonable.   |                          |
| 5.7.1  | Complete the Banner accounting system optimization project and ADP payroll system transition to Banner.          | Completed optimizations by module                          | Q2 FY 2024 | KSU reported the Banner optimization project continues with support from Ellucian and the Board approved a work order for additional services through 2024.  | Partially<br>Implemented |
| 5.7.2  | Complete the Banner accounting system optimization project and ADP payroll system transition to Banner.          | Summative report on necessary optimizations                | Q2 FY 2024 | KSU submitted a report on the Banner optimization project with support from Ellucian and noted the Board approved a work order for additional services through 2024.   | Implemented              |
| 5.8.1  | Implement a long-range planning process to support the strategic and capital investment decision-making process. | Contract for custodial, grounds, and facilities management | Q3 FY 2023 | CPE verified that KSU implemented this objective. The Board approved a contract with Sodexo on December 28, 2022, to oversee the facilities management function. Kentucky's Government Contract Review Committee approved the contract on January 10, 2023.  | Implemented              |
| 5.8.2  | Implement a long-range planning process to support the strategic and capital investment decision-making process. | Deferred<br>Maintenance<br>Schedule                        | Q4 FY 2023 | KSU reported there is not currently an articulated account of all necessary deferred maintenance for each building. KSU is working with a consulting firm to assess facilities on campus. One assessment on Student Housing was completed at the end of 2023 but this assessment didn't include a deferred maintenance schedule for Student Housing. | Partially<br>Implemented |
| 5.10.1 | Develop appropriate policies and procedures governing the key functions  | Cash and<br>Treasury                                       | Q4 FY 2023 | Moss Adams reviewed a working draft of how state accounts are managed,   | Partially<br>Implemented |



| #      | Objective  | Deliverable                                       | Deadline   | Validation Comments  | Validation<br>Result |
|--------|--|---|------------|--|----------------------|
|        | of treasury management, including cash management, operating investment management, debt management and internal loans.  | management<br>procedures<br>manual                |            | and a Treasury Management policy related to state deposits. Staff did not provide other cash management, operating investment management, debt management, and internal loans policies and procedures. |                      |
| 5.11.1 | Implement a formal endowment management framework.   | Summative report                                  | Q2 FY 2024 | KSU provided the updated Endowment and Investment policies. Moss Adams is confirming these policies were approved by the Board.  | Implemented          |
| 5.13.1 | Develop a campus master plan and a three- and five-year capital project plan focused on asset preservation.  | Campus Master<br>Plan and Capital<br>Project Plan | Q2 FY 2024 | KSU provided the campus master plan and three and five year capital project plan focused on asset preservation along with the approval from the Board.   | Implemented          |
| 5.15.1 | Determine professional organizations that provide resources to assist the University with planning and evaluating effectiveness and secure membership.   | Summative report                                  | Q1 FY 2024 | KSU provided a list of professional organizations that provide resources to assist the University with planning and evaluating effectiveness and secure membership.                                    | Implemented          |
| 5.16.1 | Encourage finance staff to attend the College Business Management Institute (CBMI).  | Registration and report of attendance             | Q1 FY 2024 | Moss Adams reviewed registration for four staff to attend CBMI in 2023: Rachelle Ashcraft, Tonya Walker, Danielle Barber, and Justin Peach.  | Implemented          |
| 5.17.1 | Incorporate National Association of College and University Business Officers (NACUBO) Financial Accounting and Reporting Manual for Higher Education (FARM) as a guiding document for all business procedures. | Revised<br>business<br>procedures<br>document     | Q2 FY 2024 | KSU staff reported they are currently reviewing FARM for incorporation into procedures, but no documentation was provided.   | Undetermined         |



| #      | Objective  | Deliverable         | Deadline   | Validation Comments  | Validation<br>Result     |
|--------|--|---------------------|------------|--|--------------------------|
| 5.18.1 | Complete a software audit to determine if all purchased and licensed software is necessary and being used effectively. | Summative<br>Report | Q2 FY 2024 | KSU staff reported the software audit continues to be in progress with an updated timelines submitted to Moss Adams with an estimated final report to be done at the end of Q1 2024, however, no updates have been provided on the progress of the software audit. | Partially<br>Implemented |

| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 4          | 8          | 21         |            |            |
| Objectives Partially Implemented | 6          | 8          | 7          |            |            |
| Objectives Not Implemented       | 3          | 1          | 0          |            |            |
| Undetermined                     | 4          | 0          | 1          |            |            |
| Due Later                        | 23         | 23         | 10         |            |            |
| Total Objectives                 | 40         | 40         | *39        |            |            |

<sup>\*</sup>Objective 5.8.3 was moved to the recurring section.

### **Recurring Quarterly Objectives**

The table that follows includes a summary of validation results for the recurring quarterly objectives.



|       |  |   |   |                          | Valid                    | lation Results           |               |               |
|-------|--|---|---|--------------------------|--------------------------|--------------------------|---------------|---------------|
| #     | Objective  | Deliverable   | Validation Comments   | Q4 FY 2023               | Q1 FY 2024               | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |
| 5.1.1 | Evaluate and revise internal budgetary controls and provide a quarterly budget to actual report to the Board of Regents. | Master list of<br>budgeted<br>positions<br>reconciled to<br>departmental<br>budgets<br>monthly                          | Staff provided the budget position listing for September and November 2023 and the new budget director is working on a reconciliation of budgeted positions to departmental budgets.  | Partially<br>Implemented | Partially<br>Implemented | Partially<br>Implemented |               |               |
| 5.1.2 | Evaluate and revise internal budgetary controls and provide a quarterly budget to actual report to the Board of Regents. | Monthly budget<br>to actual<br>reports for<br>E&G,<br>Auxiliaries,<br>Land Grant<br>Match, and<br>Asset<br>Preservation | Moss Adams verified<br>budget to actual reports<br>were completed for<br>September, October,<br>and November 2023.  | Implemented              | Partially<br>Implemented | Implemented              |               |               |
| 5.1.3 | Evaluate and revise internal budgetary controls and provide a quarterly budget to actual report to the Board of Regents. | Budget projection prepared monthly for E&G, Auxiliaries, Land Grant Match, and Asset Preservation                       | KSU provided a draft of the budget projections through the end of the fiscal year with projections for some budgeted items. The budget director is working on filling out the draft to include projections for all budget item. | Partially<br>Implemented | Partially<br>Implemented | Partially<br>Implemented |               |               |



|       |   |   |   |                          | Valid                    | dation Results           |               |               |
|-------|---|---|---|--------------------------|--------------------------|--------------------------|---------------|---------------|
| #     | Objective   | Deliverable   | Validation Comments   | Q4 FY 2023               | Q1 FY 2024               | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |
| 5.2.2 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Clearing<br>accounts<br>reconciled<br>within 14 days<br>of end of each<br>month | Moss Adams reviewed clearing account reconciliation reports submitted by staff. Staff noted reconciliations are still in progress for September, October, and November and KSU is working with Ellucian and the Bursar to complete monthly reconciliations for the clearing accounts. | Partially<br>Implemented | Partially<br>Implemented | Partially<br>Implemented |               |               |
| 5.2.3 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Bank accounts<br>reconciled<br>within 14 days<br>of end of each<br>month        | Staff noted several bank reconciliations are still in progress for September, October, and November. KSU noted they are working with Ellucian to complete all bank reconciliations.   | Implemented              | Partially<br>Implemented | Partially<br>Implemented |               |               |



|       |   |  |  |                          | Valid       | dation Results           |               |               |
|-------|---|--|--|--------------------------|-------------|--------------------------|---------------|---------------|
| #     | Objective   | Deliverable  | Validation Comments  | Q4 FY 2023               | Q1 FY 2024  | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |
| 5.2.4 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Monthly closing<br>entries posted<br>within 14 days<br>of end of each<br>month | Moss Adams reviewed September, October, and November closing entries but several questions about the closing process remain outstanding. KSU and Moss Adams are planning a meeting in January 2024 to review this process. | Partially<br>Implemented | Implemented | Partially<br>Implemented |               |               |
| 5.2.5 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Month closed<br>by the 15th day<br>of each month                               | Moss Adams verified<br>September, October,<br>and November months<br>were closed by the 15th<br>of the month.  | Partially<br>Implemented | Implemented | Implemented              |               |               |



|       |   |   |   | Validation Results       |                          |                          |               |               |
|-------|---|---|---|--------------------------|--------------------------|--------------------------|---------------|---------------|
| #     | Objective   | Deliverable   | Validation Comments   | Q4 FY 2023               | Q1 FY 2024               | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |
| 5.2.7 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Statement of<br>Revenues,<br>Expenses and<br>Changes in Net<br>Position by<br>15th of each<br>month (income<br>statement) | Moss Adams reviewed statements for September, October, and November.  | Partially<br>Implemented | Implemented              | Implemented              |               |               |
| 5.2.8 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Statement of<br>Net Position by<br>15th of each<br>month (cash<br>flow and trial<br>balance)                              | KSU did not provide the Statement of Net Position for September 2023 but did provide the statement for October and November 2023. | Not<br>Implemented       | Not<br>Implemented       | Partially<br>Implemented |               |               |
| 5.2.9 | Improve the accounting and reporting system,  | Credit card account reconciliations   | Moss Adams reviewed credit card reconciliations for   | Partially<br>Implemented | Partially<br>Implemented | Partially<br>Implemented |               |               |



|            |   |   |   |                          | Valid                    | lation Results           |               |               |
|------------|---|---|---|--------------------------|--------------------------|--------------------------|---------------|---------------|
| #          | Objective   | Deliverable   | Validation Comments   | Q4 FY 2023               | Q1 FY 2024               | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |
|            | as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents.  |   | September, October, and November, but several questions about the reconciliation process remain outstanding. KSU and Moss Adams are planning a meeting in January 2024 to review this process.      |                          |                          |                          |               |               |
| 5.2.1      | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Balance of<br>asset<br>preservation<br>fund reserves<br>for month-end | Moss Adams reviewed the asset preservation reserve amount and transaction listing for September through November 2023 showing the asset preservation balance decreased by \$82,866 for the quarter. | Partially<br>Implemented | Partially<br>Implemented | Implemented              |               |               |
| 5.2.1<br>2 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide   | Accounts payable aging summary  | Moss Adams reviewed the accounts payable (AP) aging details for September, October, and November but have some outstanding questions on the AP  | Partially<br>Implemented | Implemented              | Partially<br>Implemented |               |               |



|       |   |   |  |                    | Valid                    | dation Results           |               |               |
|-------|---|---|--|--------------------|--------------------------|--------------------------|---------------|---------------|
| #     | Objective   | Deliverable   | Validation Comments  | Q4 FY 2023         | Q1 FY 2024               | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |
|       | quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. |   | process including back<br>up support. KSU and<br>Moss Adams are<br>planning a meeting in<br>January 2024 to review<br>AP aging processes<br>and reporting.   |                    |                          |                          |               |               |
| 5.3.3 | Outsource or co-<br>source the internal<br>audit function and<br>reinstate the<br>externally<br>managed tip line.             | Reinstitute<br>external tip line  | The external tip line was reinstated in the middle of 2022 and an external vendor was contracted in April 2023 to handle all calls. Moss Adams verified the tipline phone number is active and website reporting is available. | Implemented        | Implemented              | Implemented              |               |               |
| 5.3.6 | Outsource or co-<br>source the internal<br>audit function and<br>reinstate the<br>externally<br>managed tip line.             | Monitor execution of internal audit plan and delivery of audit reports to the audit committee | The internal auditor presented audit updates at the November 2023 Board Meeting.   | Not<br>Implemented | Implemented              | Implemented              |               |               |
| 5.3.8 | Outsource or co-<br>source the internal<br>audit function and<br>reinstate the<br>externally<br>managed tip line.             | Quarterly reports on tip line activity provided to the audit committee                        | Tipline activity reports were not provided to Moss Adams but KSU reported all activity is reported directly to the Board and staff do not  | Not<br>Implemented | Partially<br>Implemented | Partially<br>Implemented |               |               |



|       |  |   |   |                          | Valid                    | dation Results |               |               |
|-------|--|---|---|--------------------------|--------------------------|----------------|---------------|---------------|
| #     | Objective  | Deliverable   | Validation Comments   | Q4 FY 2023               | Q1 FY 2024               | Q2 FY 2024     | Q3 FY<br>2024 | Q4 FY<br>2024 |
|       |  |   | have access to this information.  |                          |                          |                |               |               |
| 5.5.1 | Improve the collection of student accounts receivable, including implementation of a comprehensive Student Financial Responsibility Agreement and utilization of external collection agencies, including Kentucky's Department of Revenue. | Monthly report of collection activity                   | KSU provided reports of currently enrolled students and Keys 2 Recovery collection reports for September, October, and November. A total of \$14,143 was collected in Q2 FY 2024.   | Partially<br>Implemented | Partially<br>Implemented | Implemented    |               |               |
| 5.5.2 | Improve the collection of student accounts receivable, including implementation of a comprehensive Student Financial Responsibility Agreement and utilization of external collection agencies, including                                   | Monthly report<br>of outstanding<br>student<br>balances | Moss Adams verified KSU has reports of outstanding students balances for September, October, and November. The total balance of outstanding student bills increased from September to October by about \$460k and by about \$1M from October to November. | Partially<br>Implemented | Implemented              | Implemented    |               |               |



|            |  |   |   | Validation Results       |                          |                          |               |               |  |
|------------|--|---|---|--------------------------|--------------------------|--------------------------|---------------|---------------|--|
| #          | Objective  | Deliverable                                   | Validation Comments   | Q4 FY 2023               | Q1 FY 2024               | Q2 FY 2024               | Q3 FY<br>2024 | Q4 FY<br>2024 |  |
|            | Kentucky's<br>Department of<br>Revenue.  |   |   |                          |                          |                          |               |               |  |
| 5.8.3      | Implement a long-<br>range planning<br>process to support<br>the strategic and<br>capital investment<br>decision-making<br>process.              | Asset Preservation Funding Allocation Program | Moss Adams reviewed the Asset Preservation spreadsheet showing the allocation of asset preservation by project as of June 2023 and another report as of December 2023, but documentation detailing the asset preservation program, such as policies and procedures, was not provided. | Partially<br>Implemented | Partially<br>Implemented | Partially<br>Implemented |               |               |  |
| 5.12.<br>1 | Implement<br>quarterly reporting<br>to the Board of<br>Regents on the<br>President's travel,<br>entertainment, and<br>discretionary<br>expenses. | Quarterly<br>report                           | Moss Adams verified the quarterly reports for the president's travel, entertainment, and discretionary expenses have been prepared and reviewed by the Board.   | Partially<br>Implemented | Implemented              | Implemented              |               |               |  |

<sup>\*</sup>Objective 5.8.3 was moved from the one-time section to the recurring quarterly section.



| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 3          | 7          | 9          |            |            |
| Objectives Partially Implemented | 13         | 11         | 10         |            |            |
| Objectives Not Implemented       | 3          | 1          | 0          |            |            |
| Undetermined                     | 0          | 0          | 0          |            |            |
| Total Objectives                 | 19         | 19         | 19         |            |            |

## **Recurring Annual Objectives**

The table that follows includes a summary of validation results for the recurring annual objectives.

|        |  |  |  |             | Validation | Results    |            |
|--------|--|--|--|-------------|------------|------------|------------|
| #      | Objective  | Deliverable                            | Validation Comments  | Q1 FY 2024  | Q2 FY 2024 | Q1 FY 2025 | Q2 FY 2025 |
| 5.1.5  | Evaluate and revise internal budgetary controls and provide a quarterly budget to actual report to the Board of Regents.   | Annual<br>Budget<br>Variance<br>Report | KSU provided the FY 2023 budget to actual report that was presented to the Board.  | Implemented | N/A        |            |            |
| 5.10.2 | Develop appropriate policies<br>and procedures governing the<br>key functions of treasury<br>management, including cash<br>management, operating<br>investment management,<br>debt management and<br>internal loans. | Annual<br>cash flow<br>projection      | Staff provided the draft cash forecast as of August 31, 2023, which includes forecasted to actual cash over the next fiscal year ending June 2024. To date, KSU has updated the monthly actuals. | Implemented | N/A        |            |            |



|        |   |  |   |            | Validation         | Results    |            |
|--------|---|--|---|------------|--------------------|------------|------------|
| #      | Objective   | Deliverable                                  | Validation Comments   | Q1 FY 2024 | Q2 FY 2024         | Q1 FY 2025 | Q2 FY 2025 |
| 5.2.10 | Improve the accounting and reporting system, as well as internal controls over financial reporting, and provide quarterly Generally Accepted Accounting Principles (GAAP) statements and other financial information to the Board of Regents. | Annual<br>Financial<br>Statement<br>Analysis | The 2023 Financial Statement Audit has not been completed yet. The external auditors finished the 2021 audit in October of 2023 and then initiated the 2022 audit which is in progress.   | N/A        | Not<br>Implemented |            |            |
| 5.4.7  | Implement a formal accounting and reporting framework for endowment distributions.  | Report on<br>Fundraising<br>Efficiency       | KSU provided the Office of Institutional Advancement presentation to the Board's Investment and Advancement Committee on October 18, 2023. Included in the presentation was the report on fundraising metrics, specifically, the dollars raised each fiscal year. | N/A        | Implemented        |            |            |

| Deliverable Status               | Q1 FY 2024 | Q2 FY 2024 | Q1 FY 2025 | Q2 FY 2025 |
|----------------------------------|------------|------------|------------|------------|
| Objectives Implemented           | 2          | 0          |            |            |
| Objectives Partially Implemented | 0          | 1          |            |            |
| Objectives Not Implemented       | 0          | 1          |            |            |
| Undetermined                     | 0          | 0          |            |            |
| Due Later                        | 2          | 2          |            |            |



| Deliverable Status | Q1 FY 2024 | Q2 FY 2024 | Q1 FY 2025 | Q2 FY 2025 |
|--------------------|------------|------------|------------|------------|
| Total Objectives   | 4          | 4          |            |            |

#### F. ELEMENT 6: STUDENT SUCCESS

Element 6 is related to the need for student success and enrollment management strategies.

| #     | Objective  | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result     |
|-------|--|--|------------|--|--------------------------|
| 6.1.1 | Review the current reporting and organizational structure across student success and enrollment management units to improve communication, efficiency, and effectiveness.      | Summative<br>report and<br>updated<br>organizational<br>chart            | Q3 FY 2023 | CPE verified that KSU implemented this objective. The Student Services division was restructured to refocus Student Services on creating intentionality in the conditions that enhance student learning and development, as well as encouraging student commitment to educationally purposeful activities both inside and outside the classroom. Enrollment Services, Student Success, and the Dean of Students Office are included in Student Services. | Implemented              |
| 6.2.1 | Develop a coordinated enrollment management function and plan, including but not limited to specific targeting of Kentucky students.   | Summative<br>report and<br>Implementation<br>Plan                        | Q2 FY 2024 | Staff provided the Admissions Recruitment Plan that addresses enrollment management and targets specific Kentucky students.  | Implemented              |
| 6.3.1 | With the assistance of a private consultant, develop a student success model rooted in evidence-based best practices to support KSU admits from enrollment through completion. | Participation in<br>James Graham<br>Brown<br>Foundation Grant<br>Project | Q4 FY 2023 | Staff reported KSU has made substantial progress in developing a student success model to support KSU admits from enrollment to completion. KSU collaborated with the Advising Success Network (ASN) to reimagine academic advising, including developing a shared understanding of the role of the advisor in student   | Partially<br>Implemented |



| #     | Objective  | Deliverable  | Deadline   | Validation Comments  | Validation<br>Result     |
|-------|--|--|------------|--|--------------------------|
|       |  |  |            | performance and results, creating a definition for operational advising, and examining and improving process mapping for advising processes. ASN is also assisting KSU with developing an advising outline, handbook, and training modules. Once these items are complete, this objective will be implemented.   |                          |
| 6.4.1 | Redesign the first-year experience course to integrate career exploration, academic planning and transition support content, and resources.  | Summative<br>report and<br>Implementation<br>and Training Plan | Q4 FY 2023 | Staff reported training was provided to staff and faculty members who will serve as adjuncts for the first-year experience course (KSU 118). Participants were given the opportunity to provide feedback on the course and propose assignments to enhance the course. An RFP is in the approval process to find a contractor to support redesigning the course. The redesigned course is expected to be offered in Fall 2024.  | Partially<br>Implemented |
| 6.5.1 | Develop and improve processes at the opening of each academic term, including a student communication plan, housing (application, assignment, and billing), student orientation, tuition/room and board billing, and payment deadlines and student financial responsibilities. | Summative<br>Report and<br>Implementation<br>Plan              | Q4 FY 2023 | Staff reported KSU is continuing to work on improving processes at the opening of each academic term. To improve processes moving forward, the Division of Student Affairs plans to optimize and better integrate its systems to support automatic entry of housing charges and key card activation and has established key dates for opening academic term processes. Additionally, the Office of Admissions will coordinate New Student Orientation. This objective is | Partially<br>Implemented |



| #      | Objective  | Deliverable  | Deadline   | Validation Comments   | Validation<br>Result     |
|--------|--|--|------------|---|--------------------------|
|        |  |  |            | expected to be implemented in 2024-2025 academic year.  |                          |
| 6.7.1  | Establish cross-training expectations and succession planning across student affairs units to limit the impact of staff turnover and vacancies.  | Summative<br>Report and<br>Implementation<br>Plan    | Q2 FY 2024 | Staff provided a summative report and implementation plan on cross-training expectations and succession planning across student affairs to limit the impact of staff turnover and vacancies.  | Implemented              |
| 6.10.1 | Evaluate athletics programming (including the marching band) and structures to improve processes around enrollment, recruitment and student success measures and determine the cost benefit of athletic program offerings, recommending any necessary restructuring, including competition level and conference affiliation. | Summative<br>Report                                  | Q1 FY 2024 | KSU provided a draft annual review of athletics and another document reviewing the state of athletics, which reference several pieces of the objective but do not fully evaluate enrollment, recruitment and student success, cost benefit of athletic program offerings, or restructuring within athletics.  | Partially<br>Implemented |
| 6.11.1 | Create a sustainable Summer Bridge Program for potentially at-risk incoming freshmen.  | Detailed Summer<br>Bridge Program<br>plan and budget | Q4 FY 2023 | KSU developed the Accelerate Summer Bridge Program that aims to serve as an accelerated supplemental instruction model designed to prepare participating students to enter credit- bearing coursework in the first semester of college. KSU previously offered a five-week summer bridge program via the Pre-College Academy. Accelerate was designed as a two- week program for financial stability purposes but may be returned to a five-week program in the future. | Implemented              |



| #      | Objective                                 | Deliverable   | Deadline   | Validation Comments  | Validation<br>Result     |
|--------|---|---|------------|--|--------------------------|
| 6.12.1 | Improve support for student mental health | Participate in the<br>Jed Foundation<br>Program and<br>provide Mental<br>Health First Aid<br>training | Q4 FY 2023 | Staff reported KSU continues to participate in the four-year Jed Foundation Program. KSU aims to train 25 students, staff, and faculty in Mental Health First Aid in the 2024 academic year. Staff reported challenges in hiring staff to support mental health initiatives but a new staff member was hired to perform this work. | Partially<br>Implemented |

| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 2          | 2          | 5          |            |            |
| Objectives Partially Implemented | 4          | 5          | 4          |            |            |
| Objectives Not Implemented       | 0          | 0          | 0          |            |            |
| Undetermined                     | 0          | 0          | 0          |            |            |
| Due Later                        | 7          | 6          | 4          |            |            |
| Total Objectives                 | 13         | 13         | 13         |            |            |



#### G. ELEMENT 7: STUDENT ACADEMIC PROGRESS

Element 7 is related to the need for student academic progress and results.

| #     | Objective   | Deliverable                                       | Deadline    | Validation Comments  | Validation<br>Result |
|-------|---|---|-------------|--|----------------------|
| 7.2.1 | Meet first- to second-year retention and progression targets to support completion goals (graduation rate and degrees conferred). | N/A   | Q2 FY 2024  | No documentation or update provided.   | Not Implemented      |
| 7.6.1 | Develop a system to manage institution-wide and program/departmental student cohorts to improve completion rates.                 | Summative<br>Report and<br>Implementation<br>Plan | Q2 FY 2024  | KSU provided an updated summative report detailing the system put in place to manage institution-wide and program student cohorts to improve completion rates. | Implemented          |
| 7.7.1 | Implement a predictive analytics model to develop a student recruitment profile and early warning system for enrolled students.   | Summative<br>Report and<br>Implementation<br>Plan | Annually Q2 | No documentation or update provided.   | Not Implemented      |

| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 0          | 0          | 1          |            |            |
| Objectives Partially Implemented | 0          | 0          | 0          |            |            |
| Objectives Not Implemented       | 1          | 0          | 2          |            |            |
| Undetermined                     | 0          | 0          | 0          |            |            |
| Due Later                        | 6          | 7          | 3          |            |            |
| Total Objectives                 | 7          | 7          | 6*         |            |            |

<sup>\*</sup> Note, objective 7.9.1 was deleted as this objective was similar to objective 7.6.1.

#### H. ELEMENT 8: ONLINE PROGRAMS

Element 8 relates to the need for development and enhancement of online offerings.

| #     | Objective   | Deliverable  | Deadline   | Validation Comments   | Validation<br>Result     |
|-------|---|--|------------|---|--------------------------|
| 8.1.1 | Identify a partner to develop an online program infrastructure and model, which shall include but not be limited to competency-based programs for business, public administration, and education. | Issue RFP and contract award                               | Q4 FY 2023 | KSU provided the contract with Magellan Learning Solutions to develop an online program infrastructure and model.   | Implemented              |
| 8.2.1 | Utilize Gray Associates PES+ Market system to identify high-demand online programs to implement.  | Summative<br>report and<br>proposal<br>development<br>plan | Q4 FY 2023 | The Program Market Assessment Workshop noted under objective 4.1.3 also resulted in identification of new program opportunities. However, University leadership has not yet made final decisions about new programs, so a proposal development plan has not yet been created. | Partially<br>Implemented |



| Deliverable Status               | Q4 FY 2023 | Q1 FY 2024 | Q2 FY 2024 | Q3 FY 2024 | Q4 FY 2024 |
|----------------------------------|------------|------------|------------|------------|------------|
| Objectives Implemented           | 0          | 1          | 1          |            |            |
| Objectives Partially Implemented | 2          | 1          | 1          |            |            |
| Objectives Not Implemented       | 0          | 0          | 0          |            |            |
| Undetermined                     | 0          | 0          | 0          |            |            |
| Due Later                        | 3          | 3          | 3          |            |            |
| Total Objectives                 | 5          | 5          | 5          |            |            |



# III. APPENDIX I: KSU POLICY REVIEW AND REVISION TIMELINE

| Policy Name                              | Current Policy Owner                                      | Last Revision Date       | Revision<br>Deadline | Completed by Deadline? (Y/N) | Policy Notes   |
|--|---|--------------------------|----------------------|------------------------------|--|
| Academic Calendar                        | Academic Affairs  | 9/1/2023                 | 12/31/2023           | Yes                          |  |
| Academic Code of Conduct                 | Academic Affairs & Student<br>Affairs and General Counsel | 11/28/2023               | No due date          | Yes                          | Policy added to the schedule by Moss Adams after approval by the Board       |
| Academic Load                            | Unspecified   | Unknown                  | 1/31/2024            | Due Later                    |  |
| Academic Scholarships                    | Academic Affairs  | Unknown                  | 1/31/2024            | Due Later                    |  |
| Academic Standing                        | Academic Affairs, Registrar                               | Unknown                  | 1/31/2024            | Due Later                    |  |
| Active Shooter Emergency Plan            | Student Affairs   | Unknown                  | 12/31/2023           | No                           |  |
| Admission to University                  | Student Affairs   | Unknown                  | 1/31/2024            | Due Later                    |  |
| Anti-Harassment & Retaliation Protection | Student Affairs   | Within last two<br>years | 1/31/2024            | Due Later                    |  |
| Appeals to Academic Status               | Academic Affairs  | Unknown                  | 3/31/2024            | Due Later                    |  |
| Appropriate Usage                        | Finance & Business Affairs                                | Unknown                  | 1/31/2024            | Due Later                    |  |
| Background Check                         | Finance & Business Affairs                                | 12/18/2023               | 12/31/2023           | Yes                          |  |
| Behavioral Code of Conduct               | Student Affairs and General<br>Counsel                    | 11/28/2023               | No due date          | Yes                          | Policy added to the<br>schedule by Moss Adams<br>after approval by the Board |
| Budget Policy and Planning               | Finance & Business Affairs                                | Unknown                  | 1/31/2024            | Due Later                    |  |
| Business Casual Dress Code               | Office of the President                                   | Unknown                  | 1/31/2024            | Due Later                    |  |
| Business Manual                          | Finance & Business Affairs                                | 2010                     | 3/31/2024            | Due Later                    |  |
| Calculating GPA                          | Academic Affairs  | Unknown                  | 1/31/2024            | Due Later                    |  |
| Catalogue of Record                      | Academic Affairs  | Unknown                  | 1/31/2024            | Due Later                    |  |
| Challenge by Examination                 | Academic Affairs  | Unknown                  | 3/31/2024            | Due Later                    |  |



| Clear Bag Policy  | Office of the President                                  | 12/18/2023 | 12/31/2023  | Yes       |  |
|---|--|------------|-------------|-----------|--|
|   |  |            |             |           | Policy added to the  |
|   |  |            |             |           | schedule by Moss Adams   |
| Collections Policy                                      | Finance & Business Affairs                               | 11/28/2023 | No due date | Yes       | after approval by the Board  |
| Computer Replacement Policy                             | Finance & Business Affairs                               | Unknown    | 1/31/2024   | Due Later |  |
| Computer Software Policy                                | Finance & Business Affairs                               | Unknown    | 3/31/2024   | Due Later |  |
| Concurrent Degrees                                      | Academic Affairs   | Unknown    | 3/31/2024   | Due Later |  |
| Conflict of Commitment and<br>Interest                  | Board of Regents   | Unknown    | 3/31/2024   | Due Later |  |
| Consumer Information Guide                              | Academic Affairs   | Unknown    | 6/30/2024   | Due Later |  |
| Contract Management Policy                              | Finance & Business Affairs;<br>Office of General Counsel | 6/30/2023  | 12/31/2023  | Yes       |  |
| Contract Management Policy                              | Finance & Business Affairs and General Counsel           | 11/28/2023 | No due date | Yes       | Policy added to the schedule by Moss Adams after approval by the Board |
| Cost-Sharing Policy                                     | Grants & Sponsored Programs                              | Unknown    | 1/31/2024   | Due Later |  |
| Course Attendance and Title IV                          | Academic Affairs   | Unknown    | 3/31/2024   | Due Later |  |
| Course Enrollment Policy                                | Academic Affairs   | Unknown    | 1/31/2024   | Due Later |  |
| Course Numbering System                                 | Academic Affairs   | Unknown    | 1/31/2024   | Due Later |  |
| Course Repeat Policy                                    | Academic Affairs   | Unknown    | 3/31/2024   | Due Later |  |
| Course Withdrawal Policy                                | Academic Affairs   | Unknown    | 3/31/2024   | Due Later |  |
| Credit Earning Alternatives                             | Academic Affairs   | Unknown    | 3/31/2024   | Due Later |  |
| Credit Hour Policy                                      | Academic Affairs   | Unknown    | 1/31/2024   | Due Later |  |
| Data Classification Policy                              | Finance & Business Affairs                               | Unknown    | 3/31/2024   | Due Later |  |
| Data Policy   | Academic Affairs   | Unknown    | 3/31/2024   | Due Later |  |
| Delays and Cancellations                                | University Police  | Unknown    | 1/31/2024   | Due Later |  |
| Deposits to the Kentucky State<br>University Foundation | Institutional Advancement                                | 11/28/2023 | No due date | Yes       | Policy added to the schedule by Moss Adams after approval by the Board |



| Deposits to the KSU                                       | Office of Institutional                       |               |             |           |  |
|---|---|---------------|-------------|-----------|--|
| Foundation, Inc.  | Advancement                                   | 6/20/2023     | 12/31/2023  | Yes       |  |
| Disbursements from the                                    |   |               |             |           | Policy added to the                        |
| Kentucky State University                                 |   |               |             |           | schedule by Moss Adams                     |
| Foundation  | Institutional Advancement                     | 11/28/2023    | No due date | Yes       | after approval by the Board                |
| Disbursements from the KSU                                | Office of Institutional                       |               |             |           |  |
| Foundation, Inc.  | Advancement                                   | 6/20/2023     | 12/31/2023  | Yes       |  |
| Dismissal from the University                             | Academic Affairs                              | Unknown       | 3/31/2024   | Due Later |  |
|   | Global Strategies and                         |               |             |           |  |
|   | International Affairs,                        |               |             |           | D. P I I . I f. H.                         |
| Domestic and International                                | Academic Affairs & Student Affairs, and Human |               |             |           | Policy added to the schedule by Moss Adams |
| Exchange Policy   | Resources                                     | 11/28/2023    | No due date | Yes       | after approval by the Board                |
|   |   |               |             |           | alter approval by the board                |
| Drug- and Alcohol-Free Policy Dual Enrollment/Dual Credit | Human Resources                               | Unknown       | 3/31/2024   | Due Later |  |
| Policy  | Academic Affairs                              | Unknown       | 3/31/2024   | Due Later |  |
|   | Finance & Business Affairs                    | Unknown       | 3/31/2024   | Due Later |  |
| Email Policy  |   | _             | 1           |           |  |
| Employment and Job Posting                                |   | Unknown       | 1/31/2024   | Due Later |  |
| F., d.,   | Finance & Business Affairs                    |               |             |           | Policy added to the                        |
| Endowment Investment &                                    | and Institutional Advancement                 | 12/18/2023    | No due date | Yes       | schedule by Moss Adams                     |
| Spending Policy Establishment of Kentucky                 | Advancement                                   | 12/10/2023    | No due date | res       | after approval by the Board                |
| Residency   | Academic Affairs                              | Unknown       | 6/30/2024   | Due Later |  |
|   | Board of Regents, Finance &                   |               |             |           | Policy added to the                        |
|   | Business Affairs, and                         |               |             |           | schedule by Moss Adams                     |
| Ethics Hotline Policy                                     | General Counsel                               | 11/28/2023    | No due date | Yes       | after approval by the Board                |
|   |   | Unknown, but  |             |           |  |
| Faculty Benefits  | Human Resources                               | probably 2018 | 3/31/2024   | Due Later |  |
| Faculty Handbook  | Academic Affairs                              | 8/27/2019     | 3/31/2024   | Due Later |  |
| FERPA Policy  | Academic Affairs                              | Unknown       | 4/30/2024   | Due Later |  |
| Finance & Business Affairs                                |   |               |             |           |  |
| Policies  | Finance & Business Affairs                    | 4/30/2010     | 3/31/2024   | Due Later |  |



| General Education Transfer                               | Academic Affairs; Student   |            |            |           |   |
|--|---|------------|------------|-----------|---|
| Policy   | *   | Unknown    | 4/30/2024  | Due Later |   |
| Gift Acceptance  | Academic Affairs  | Unknown    | 4/30/2024  | Due Later |   |
| Grading System   |   | Unknown    | 1/31/2024  | Due Later |   |
| Graduate Catalogue                                       |   | 2020       | 6/30/2024  | Due Later |   |
| Graphics Standards Manual                                | Brand Identity/Marketing  | Unknown    | 3/31/2024  | Due Later |   |
| Grievance Policy   | , ,   | Unknown    | 3/31/2024  | Due Later |   |
| Holiday Schedule and Leave                               | Human Resources; Finance<br>& Business Affairs                            | Unknown    | 3/31/2024  | Due Later |   |
| HR Policy Manual   | Human Resources   | 3/26/2013  | 3/31/2024  | Due Later |   |
| Instructional Technology/Online Course Enrollment/Access |   | Unknown    | 3/31/2024  | Due Later |   |
| Integrity and Ethics                                     | Office of General Counsel;<br>Human Resources                             | Unknown    | 1/31/2024  | Due Later |   |
| Internal Audit Policy Manual                             | Internal Auditor  | Unknown    | 6/30/2024  | Due Later |   |
| International Students                                   | Unspecified   | Unknown    | 1/31/2024  | Due Later |   |
| IRB Guidelines   | Office of Research, Grants  | 9/1/2023   | 12/31/2023 | Yes       |   |
| IT Audit and Accountability                              | Finance & Business Affairs  | 12/18/2023 | 12/31/2023 | Yes       |   |
| IT Password Policy                                       | Information Technology and<br>Department of Finance &<br>Business Affairs | 12/18/2023 | 12/31/2023 | Yes       |   |
| IT Security Policy                                       | Finance & Business Affairs  | 12/18/2023 | 12/31/2023 | Yes       |   |
| K-Book (Student Handbook)                                | Student Affairs   | 7/1/2022   | 12/31/2023 | No        |   |
| Maintaining Students Records                             | Finance & Business Affairs  | Unknown    | 12/31/2024 | Due Later |   |
| Mission Statement  | Brand Identity/Marketing  | 12/18/2023 | 12/31/2023 | Yes       |   |
| Naming or Renaming Policy                                |   | Unknown    | 12/31/2024 | Due Later | _ |
| Nepotism Policy  | Human Resources; Board of Regents   | Unknown    | 12/31/2024 | Due Later |   |



|  | Office of General Counsel;   |            |             |           |  |
|--|--|------------|-------------|-----------|--|
| Non-Fraternization Policy                                  | Human Resources  | Unknown    | 12/31/2024  | Due Later |  |
| Office of Internal Audit Policies                          |  |            |             |           |  |
| & Procedures Manual  | Internal Auditor   | Unknown    | 12/31/2024  | Due Later |  |
| Online Learning Policy                                     | Academic Affairs   | Unknown    | 12/31/2023  | No        |  |
| Open Records Policy  | Unspecified  | 12/18/2023 | 12/31/2023  | Yes       |  |
| Outside Activities   | Finance & Business Affairs   | Unknown    | 12/31/2023  | No        |  |
| Outside Employement and<br>Activities Policy               | Human Resources  | 12/18/2023 | No due date | Yes       | Policy added to the schedule by Moss Adams after approval by the Board |
| Philanthropic Donations From<br>Faculty and Staff          | Office of Institutional<br>Advancement   | 6/20/2023  | 12/31/2023  | Yes       |  |
| Photo Release  | VP Nathalie Evans  | Unknown    | 1/30/2024   | Due Later |  |
| Policy on Internal Endowment<br>Agreements                 | Institutional Advancement<br>and Finance & Business<br>Affairs                           | 11/28/2023 | No due date | Yes       | Policy added to the schedule by Moss Adams after approval by the Board |
| Policy on Philanthropic                                    |  |            |             |           | Policy added to the  |
| Donations from Faculty and                                 |  |            |             |           | schedule by Moss Adams   |
| Staff  | Institutional Advancement  | 11/28/2023 | No due date | Yes       | after approval by the Board  |
| Policy on Policies   |  | 2/16/2024  | 12/31/2024  | Yes       |  |
| Policy on Policies Appendices                              |  | 7/15/2022  | 12/31/2024  | Due Later |  |
| Policy on Service Animals and<br>Emotional Support Animals | Student Affairs, Accessibility<br>and Disability Resource<br>Center, and General Counsel | 11/28/2023 | No due date | Yes       | Policy added to the schedule by Moss Adams after approval by the Board |
| Readmission to the University                              | BREDS Office   | Unknown    | 12/31/2024  | Due Later |  |
| Returned Check Policy                                      | Finance & Business Affairs   | 12/18/2023 | 12/31/2023  | Yes       |  |
| Satisfactory Academic Progress                             | Finance & Business Affairs   | Unknown    | 12/31/2023  | No        |  |
| Shared Sick Leave Policy                                   | Human Resources  | Unknown    | 12/31/2024  | Due Later |  |
| Sick Leave Policy  | Human Resources  | 3/1/2021   | 12/31/2024  | Due Later |  |



|   |   |              |             |           | Policy added to the  |
|---|---|--------------|-------------|-----------|--|
|   | President and Finance &   |              |             |           | schedule by Moss Adams   |
| Space Management Policy                     | Business Affairs  | 11/28/2023   | No due date | Yes       | after approval by the Board  |
| Sponsored Programs                          | Office of the President   | Unknown      | 1/31/2024   | Due Later |  |
| Staff Senate Constitution                   | Unspecified   | 6/4/2020     | 3/31/2024   | Due Later |  |
| Student Athlete Handbook                    | Unspecified   | Unknown      | 1/31/2024   | Due Later |  |
| Student Complaints                          | Academic Affairs  | Unknown      | 1/31/2024   | Due Later |  |
| Student Financial Aid Policy                | Finance & Business Affairs  | Unknown      | 12/31/2024  | Due Later |  |
| Student Government Association Constitution | Unspecified   | Unknown      | 3/31/2024   | Due Later |  |
| Students in Research Policy                 | Academic Affairs  | 2012 or 2013 | 12/31/2024  | Due Later |  |
| Study Abroad Policy                         | Global Strategies and<br>International Affairs,<br>Academic Affairs & Student<br>Affairs, and Registrar | 11/28/2023   | No due date | Yes       | Policy added to the schedule by Moss Adams after approval by the Board |
| Support Services Animal Policy              | ADRC; Student Affairs; Office of General Counsel  | 11/28/2023   | 12/31/2023  | Yes       |  |
| Technology Complaints                       | Finance & Business Affairs  | 8/15/2023    | 10/31/2024  | Due Later |  |
| Telecommute Policy                          | Finance & Business Affairs  | Unknown      | N/A         | N/A       | May need to be revoked   |
| Temporary Telecommuting Policy              |   | Unknown      | N/A         | N/A       | Policy revoked by the Board.   |
| The Gold Book                               | Board of Regents; Office of<br>General Counsel  | 11/28/2023   | 12/31/2023  | Yes       |  |
| Title IV Policy                             | Finance & Business Affairs  | 12/5/2019    | 1/31/2024   | Due Later |  |
| Title IX Policy                             | Office of General Counsel   | 9/3/2020     | 1/31/2024   | Due Later |  |
| Trainings Policy                            | Finance & Business Affairs  | Unknown      | 12/31/2023  | No        |  |
| Transcript Requests                         | Academic Affairs  | 12/18/2023   | 12/31/2023  | Yes       |  |
| Tuition Refund Policy                       | Office of the Bursar; Finance & Business Affairs  | Unknown      | 1/30/2024   | Due Later |  |
| Tuition Waivers                             | Finance & Business Affairs  | Unknown      | 12/31/2024  | Due Later |  |



| Undergraduate Catalogue        | Unspecified                  | Unknown    | 12/31/2024  | Due Later |  |
|--------------------------------|------------------------------|------------|-------------|-----------|--|
| University Equipment           | Finance & Business Affairs   | 2019       | 3/31/2024   | Due Later |  |
| University Vehicles Policy     | Finance & Business Affairs   | Unknown    | 1/31/2024   | Due Later |  |
| Use of University Internet for |                              |            |             |           |  |
| Faculty & Staff                | Finance & Business Affairs   | Unknown    | 12/31/2024  | Due Later |  |
| Use of University Internet for |                              |            |             |           |  |
| Students                       | IT                           | Unknown    | 12/31/2024  | Due Later |  |
| Vacation Policy                | Unspecified                  | 3/1/2021   | 1/31/2024   | Due Later |  |
|                                | Academics Affairs; Finance & |            |             |           |  |
| Visiting Student Policy        | Business Affairs             | 12/18/2023 | 12/31/2023  | Yes       |  |
|                                |                              |            |             | .,        | Policy added to the schedule by Moss Adams |
| Zero Tolerance Policy          | Student Affairs              | 11/28/2023 | No due date | Yes       | after approval by the Board                |

