MUSC Standards of Behavior for Persons Authorizing or Processing Financial Transactions

MUSC’s business organization extends beyond the institutional financial area to encompass a network of personnel from colleges and administrative departments. These areas work together in partnership to achieve effective business practices. It is the collective and shared responsibility of these areas to work cooperatively in ensuring the financial integrity of the University.

Any person at any level at MUSC that directly or indirectly authorizes, approves, processes or is otherwise accountable for financial transactions, reconciliations, and oversight assumes responsibility for the fair presentation of financial information. Financial transactions include data entry to the general ledger system of record, as well as the time and leave attendance system of record.

As detailed in MUSC Administrative Policy 1-1.1 Expectations and Ethical Standards of Behavior for Persons Authorizing or Processing Financial Transactions, prudent business practices require that all such persons abide by and assume responsibility for the following:

1. The financial records under my responsibility are fairly presented in conformity with University financial policies, accounting principles, and sponsor/donor agreements.
   a) I have provided complete information on all proposed transactions to enable University officials to identify and properly account for the transactions.
   b) The financial records under my responsibility properly classify all transactions and activities. Expenditures have been charged to the appropriate entity, department, project, and function that benefits from the expense and with the object code that most accurately describes the nature of the expense. Where an account has insufficient spending authority, either cash or budget, available resources have been reallocated from other accounts and recorded in the financial records. Where an account has a preexisting deficit balance, steps have been taken to develop, implement and communicate to the appropriate authorities the results of a plan to address those balances.

2. Except as previously disclosed to the appropriate University Officials in writing, there have been no:
   a) Communications from sponsors, donors, and regulatory agencies concerning issues of noncompliance, instances of fraud, management of
institutional resources, or reporting of financial information, whether or not material, involving management or other employees who have significant roles in internal controls.

b) Violations or possible violations of laws or regulations, the effects of which should be evaluated by University Officers to record or report a loss contingency.

c) False statements affecting the University’s financial statements made to University officers or their staff, the University’s internal auditors, or any other auditor.

d) Allegations, either written or oral, of misstatements or other misapplication of accounting principles in the University’s financial records.

e) Material transactions that have not been properly recorded in the accounting records underlying the basic financial statements.

f) Events that have occurred after June 30th that would require adjustments to, or disclosure in the University’s financial statements.

3. There are no significant deficiencies in the design or operation of internal controls, which could adversely affect our ability to record, process, summarize and report financial data, and I have identified no material weaknesses in internal controls.

4. I am responsible for the identification of and compliance with all aspects of University policies, and sponsor and donor restrictions that could have a material effect on the financial records under my responsibility and have disclosed all aspects of sponsor and donor restrictions to the appropriate University office.

5. Except as previously disclosed to the appropriate University Officials in writing, I have complied, in all material respects, with applicable University policies, sponsor, and donor restrictions that could have a material effect on the financial records under my responsibility in the event of noncompliance.

Certain representations are limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in the light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.