

HARVARD UNIVERSITY
OFFICE OF THE CONTROLLER

TO: Harvard University Financial Community
FROM: Office of the Controller - Financial Accounting and Reporting (FAR)
SUBJECT: COVID-19 Impact on Internal Controls

Please note that no major changes are expected to be implemented on key business cycles controls as a result of the COVID-19 remote work environment. The following information is intended to answer questions you may have regarding this topic. If changes to control or new controls are necessary, we will work with you to implement these changes.

- I. **Segregation of Duties** – the separation of certain functions such as initiating, authorizing and recording transactions might present a challenge given the restrictions of face-to-face interactions with most people working in different physical locations
 - Most Harvard business processes are supported by systems that include workflow management – HCOM, Total Supplier Management (TSM), Concur, GMAS, PeopleSoft (including Position Tracking and Reporting), Wasabi, Aurora, Oracle CSMA, P-Card Settlement System and others
 - If workflow management is not an option:
 - continued reliance on email (**using a Harvard email address**) is appropriate to request an activity/transaction and to evidence review and approval of such transaction
- II. **Authorization/Approval Processes** – to the extent possible, approving and authorizing responsibilities within Harvard’s schools, local units and departments should continue to be limited to those individuals who have enough knowledge to make informed judgements that the transactions are appropriate
 - Online approvals - continue to rely on the built-in workflow management of many of the University systems, or acknowledge approval via email when workflow is not an option (as noted in the **Segregation of Duties** section above)
 - Paper-based, manual approvals - these present a bigger yet manageable challenge. Potential approaches include:
 - Requester scans document (i.e., invoice) to PDF format, attaches PDF document and emails to Approver who has the following options to proceed
 - Acknowledge review and approval via email (using a Harvard email address)
 - Use Adobe Acrobat which would enable the Approver to provide review comments electronically on the document itself and to acknowledge approval via a digital signature. See *Digital Signatures - Adobe – Guidelines* in the Internal Controls web site for guidance on using digital signatures via Adobe Acrobat
<https://hwpi.harvard.edu/internalcontrols/internal-controls-guidelines-and-other-resources>
 - Print documents, manually approve, scan approved documents and email back to Requester (if necessary)
 - Requester takes picture of document (i.e., invoice) with smart phone and emails to Approver who acknowledges review and approval via email. Or, Approver prints document, manually approves, scans approved document and emails back to Requester (if necessary)

- HUIT recommends using the Microsoft OneDrive for Business iOS Application to scan Level 3 and Level 4 data documents. Harvard OneDrive is part of the University's Microsoft Office 365 suite of services available to the Harvard community
https://harvard.service-now.com/ithelp?id=kb_article&sys_id=3fa77236dbe3889430ed1dca48961967
- If you need to send files/documents that ought to be protected, then use a Harvard approved method. **Accellion Kitemworks** is the HUIT-recommended tool to transfer Level 4 data or large files securely
https://harvard.service-now.com/ithelp?id=kb_category&kb_category=f71fa2c1db63530043f21bfa4b9619db

III. **Safeguarding Access to Assets and Records** – continue to follow defined University (i.e., Authorized Requestor) and local unit processes to ensure effective access to key University and local unit financial and administrative systems and records. Also, refer to the following University sites for further technology guidance and resources on the use of technology resources while working remotely

- Working remotely and accessing secured shared drives - Harvard University Information Technology (HUIT)
<https://huit.harvard.edu/remote>
- Using personal devices to access University resources, and Corona Virus scam alerts - Harvard University Information Security
<https://security.harvard.edu/coronavirus-scam-alert>

IV. **Documentary Evidence** – although it may be challenging during these times to retain and store backup documentation to furnish evidence or information regarding a decision, event, or transaction, documentary evidence retention is even more important than during normal business operations. We might be subject to more rigorous examination from our external and internal auditors - complete, clear and accurate documentation of transactions should enable an independent party to trace each transaction from inception through completion. Most Harvard systems support online storage of backup documentation, so consider the following options:

- Electronic documents – continue to follow existing practices and upload these documents as required by the business process and application (i.e., HCOM, Concur)
- Paper documents -
 - If feasible, scan these documents and upload to the appropriate application
 - See above for guidance regarding the use of Microsoft OneDrive for Business iOS Application to scan Level 3 and Level 4 data documents
 - If scanning is not an option, then capture an image via your smart phone, send the image to your Harvard email address and upload to the applicable system
 - In both cases, do retain the original paper documentation at least through FY2021
 - Please refer to the University General Records Schedule and other University (i.e., Purchasing Card Policy) and Local Unit policies for specific guidance regarding record retention

- V. **Additional Resources** – please refer to communication from University management, central units and/or your school/tub for further guidance on specific business processes affected by the Coronavirus
- Harvard University (COVID-19) main information and communication
<https://www.harvard.edu/coronavirus>
 - Harvard University Information Technology (HUIT) – IT Help for multiple categories including working remotely, secure file transfer, file sharing, and other
https://harvard.service-now.com/ithelp?id=kb_category&kb_category=c1ed6574374176009aa163d2b3990edd
 - Harvard University General Records Schedule – for record retention policy and guidance
<https://library.harvard.edu/services-tools/general-records-schedule>
 - Office of Treasury Management (OTM) – cash receipts
<https://otm.finance.harvard.edu/cash-receipts-0>
 - Strategic Procurement – A/P operations guidance
<https://oc.finance.harvard.edu/coronavirus-covid-19-accounts-payable-operations-guidance>
 - Harvard Travel Services – travel, cancellation and reimbursement guidance
<https://travel.harvard.edu/>
 - Office of the Controller (OC) – payroll and NRA emergency operations changes and guidance regarding I-9 collection
<https://oc.finance.harvard.edu/services/central-payroll>
 - Office of Sponsored Programs (OSP) – sponsored expenses
<https://osp.finance.harvard.edu/covid-19-research-related-information-and-websites>