



# MICHIGAN

OFFICE OF THE AUDITOR GENERAL

## AUDIT REPORT



THOMAS H. MCTAVISH, C.P.A.  
AUDITOR GENERAL

The auditor general shall conduct post audits of financial transactions and accounts of the state and of all branches, departments, offices, boards, commissions, agencies, authorities and institutions of the state established by this constitution or by law, and performance post audits thereof.

– Article IV, Section 53 of the Michigan Constitution

Audit report information can be accessed at:

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Michigan  
*Office of the Auditor General*  
**REPORT SUMMARY**

*Financial Audit*

Report Number:  
 271-0284-14

*Michigan Education Trust Plans B and C*

*(A Discretely Presented Component Unit of the State of Michigan)*

*Fiscal Years Ended September 30, 2013 and  
 September 30, 2012*

Released:  
 December 2013

*A financial audit determines if the financial statements are fairly presented; considers internal control over financial reporting; and determines compliance with requirements material to the financial statements. This financial audit of the Michigan Education Trust (MET) Plans B and C was conducted as part of the constitutional responsibility of the Office of the Auditor General.*

**Financial Statements:**

**Auditor's Report Issued**

We issued an unmodified opinion on the MET Plans B and C basic financial statements.

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**Internal Control Over Financial Reporting**

We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, we did identify a significant deficiency (Finding 1).

MET had not implemented a formal process to regularly monitor user access rights to the Prepaid Records Information Management Administrative (PRIMA) System (Finding 1).

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**Noncompliance and Other Matters  
 Material to the Financial Statements**

We did not identify any instances of noncompliance or other matters applicable to the financial statements that are required to be reported under *Government Auditing Standards*.

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**Agency Response:**

Our audit report contains 1 finding and 1 corresponding recommendation. MET's preliminary response indicates that it agrees with the recommendation.

~ ~ ~ ~ ~

**Background:**

MET was created under Act 316, P.A. 1986, to operate a prepaid college tuition program that will provide a

Michigan child's undergraduate tuition at any Michigan public university or community college. MET is governed by a 9-member Board of Directors that consists of the State Treasurer and 8 public members who are appointed by the Governor with the advice and consent of the Senate.

The Plan D enrollments are accounted for and reported separately from the Plans B and C enrollments. These financial statements report only Plans B and C enrollments.

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A copy of the full report can be obtained by calling 517.334.8050 or by visiting our Web site at: <http://audgen.michigan.gov>



Michigan Office of the Auditor General  
201 N. Washington Square  
Lansing, Michigan 48913

**Thomas H. McTavish, C.P.A.**  
Auditor General

**Scott M. Strong, C.P.A., C.I.A.**  
Deputy Auditor General



STATE OF MICHIGAN  
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THOMAS H. MCTAVISH, C.P.A.  
AUDITOR GENERAL

December 20, 2013

Mr. R. Kevin Clinton, State Treasurer and Chair  
Michigan Education Trust Board of Directors  
and  
Ms. Robin R. Lott, Executive Director  
Michigan Education Trust  
Richard H. Austin Building  
Lansing, Michigan

Dear Mr. Clinton and Ms. Lott:

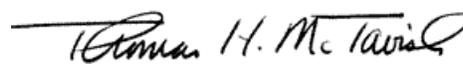
This is our report on the financial audit of the Michigan Education Trust (MET) Plans B and C, a discretely presented component unit of the State of Michigan, for the fiscal years ended September 30, 2013 and September 30, 2012.

This report contains our report summary, our independent auditor's report on the financial statements and other reporting required by *Government Auditing Standards*, the MET management's discussion and analysis, and the MET Plans B and C basic financial statements. This report also contains our independent auditor's report on internal control over financial reporting and on compliance and other matters; our finding, recommendation, and agency preliminary response; and a glossary of abbreviations and terms.

The agency preliminary response was taken from the agency's response at the end of our audit fieldwork. The *Michigan Compiled Laws* and administrative procedures require that the audited agency develop a plan to comply with the audit recommendation and submit it within 60 days after release of the audit report to the Office of Internal Audit Services, State Budget Office. Within 30 days of receipt, the Office of Internal Audit Services is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

We appreciate the courtesy and cooperation extended to us during this audit.

Sincerely,

  
Thomas H. McTavish, C.P.A.  
Auditor General



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# INDEPENDENT AUDITOR'S REPORT



STATE OF MICHIGAN  
OFFICE OF THE AUDITOR GENERAL  
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THOMAS H. MCTAVISH, C.P.A.  
AUDITOR GENERAL

Independent Auditor's Report on the Financial Statements  
and Other Reporting Required by *Government Auditing Standards*

Mr. R. Kevin Clinton, State Treasurer and Chair  
Michigan Education Trust Board of Directors  
and  
Ms. Robin R. Lott, Executive Director  
Michigan Education Trust  
Richard H. Austin Building  
Lansing, Michigan

Dear Mr. Clinton and Ms. Lott:

**Report on the Financial Statements**

We have audited the statement of net position; the statement of revenues, expenses, and changes in net position; and the statement of cash flows of the Michigan Education Trust Plans B and C, a discretely presented component unit of the State of Michigan, as of and for the fiscal years ended September 30, 2013 and September 30, 2012 and the related notes to the financial statements, which collectively comprise the Michigan Education Trust Plans B and C basic financial statements.

***Management's Responsibility for the Financial Statements***

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

***Auditor's Responsibility***

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

**Opinion**

In our opinion, the financial statements referred to in the first paragraph present fairly, in all material respects, the financial position of the Michigan Education Trust Plans B and C as of September 30, 2013 and September 30, 2012 and the changes in financial position and cash flows for the fiscal years then ended in accordance with accounting principles generally accepted in the United States of America.

**Emphasis of Matter**

As discussed in Note 1, the financial statements present only the Michigan Education Trust Plans B and C and do not purport to, and do not, present fairly the financial position of the State of Michigan or its component units, or the Michigan Education Trust Plan D, as of September 30, 2013 and September 30, 2012, the changes in its financial position, or, where applicable, its cash flows for the fiscal years then ended in accordance with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

**Other Matter**

*Required Supplementary Information*

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

**Other Reporting Required by Government Auditing Standards**

In accordance with *Government Auditing Standards*, we have also issued our report dated December 16, 2013 on our consideration of the Michigan Education Trust's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Michigan Education Trust's internal control over financial reporting and compliance.

Sincerely,



Thomas H. McTavish, C.P.A.  
Auditor General  
December 16, 2013

# MANAGEMENT'S DISCUSSION AND ANALYSIS

This is a discussion and analysis of the financial performance of the Michigan Education Trust (MET) Plans B and C for the fiscal years ended September 30, 2013 and September 30, 2012. MET is an Internal Revenue Code Section 529 qualified tuition program and is a discretely presented component unit of the State of Michigan, administratively located within the Department of Treasury. MET's management is responsible for the financial statements, notes to the financial statements, and this discussion.

### **Using the Financial Report**

This financial report includes the report of independent auditors, management's discussion and analysis, the basic financial statements, and notes to the financial statements.

Generally accepted accounting principles applicable to governments require a statement of net position; a statement of revenues, expenses, and changes in net position; and a statement of cash flows. These financial statements are interrelated and represent the financial status of MET Plans B and C.

The statement of net position includes the assets, liabilities, and net position at the end of the fiscal year. The statement of revenues, expenses, and changes in net position presents the revenues earned and expenses incurred during the fiscal year. The statement of cash flows presents information related to cash inflows and outflows summarized by operating and investing activities.

### **Financial Analysis of MET Plans B and C**

The MET Board of Directors approves an annual budget and the investment portfolio allocation. The Bureau of Investments, Department of Treasury, under the direction of the MET Board of Directors, is responsible for short-term and long-term investment of MET funds. The MET portfolio for Plans B and C is invested 100% in fixed income investments.

MET funds are invested to coincide with the students' expected years of high school graduation. Once students activate their contracts, colleges and universities submit invoices to MET every semester for tuition and mandatory fees. In 2006, the MET Board of Directors approved an amendment allowing students 15 years from the expected year of high school graduation to completely use MET contract benefits. Prior to that change, students had 9 years to use MET contract benefits.

Annually, the actuary determines the actuarial soundness of each MET plan. Key factors used in the soundness analysis are tuition increases (short-term and long-term), investment performance, and college selection by students and purchasers.

### **Comparison of Current Year and Prior Year Results**

#### **Condensed Financial Information From the Statement of Net Position**

As of September 30

(In Thousands)

	<u>2013</u>	<u>2012</u>	<u>2011</u>
Current assets	\$ 38,006	\$ 65,382	\$ 85,667
Noncurrent assets	117,627	109,137	114,729
Total assets	<u>\$155,633</u>	<u>\$174,519</u>	<u>\$200,396</u>
Current liabilities	\$ 51,009	\$ 61,007	\$ 63,011
Noncurrent liabilities	87,267	96,145	126,262
Total liabilities	<u>\$138,275</u>	<u>\$157,153</u>	<u>\$189,274</u>
Net position - Restricted	<u>\$ 17,358</u>	<u>\$ 17,366</u>	<u>\$ 11,122</u>
Total net position	<u>\$ 17,358</u>	<u>\$ 17,366</u>	<u>\$ 11,122</u>

**Total net position** decreased by \$9,000 in fiscal year 2012-13 and increased by \$6.2 million in fiscal year 2011-12. The net position decreased in fiscal year 2012-13 because of unfavorable investment performance. The net position increased in fiscal year 2011-12 because of favorable investment performance at year-end.

**Current assets** decreased by \$27.4 million in fiscal year 2012-13 and decreased by \$20.3 million in fiscal year 2011-12 primarily because of the decrease in cash and cash equivalents that were used to pay tuition benefit payments.

**Noncurrent assets** increased by \$8.5 million in fiscal year 2012-13 and decreased by \$5.6 million in fiscal year 2011-12. The increase in fiscal year 2012-13 resulted primarily from the investment of short-term proceeds into the long-term portfolio. The

decrease in fiscal year 2011-12 was a result of the MET Plans B and C being closed to new contracts and the liquidation of investments to meet the increased tuition benefit payments.

**Total liabilities** decreased by \$18.9 million in fiscal year 2012-13 and decreased by \$32.1 million in fiscal year 2011-12. The tuition benefits payable decrease reflects the increase in tuition contract payments made to colleges.

**Condensed Financial Information**  
**From the Statement of Revenues, Expenses, and Changes in Net Position**  
Fiscal Years Ended September 30  
(In Thousands)

	2013	2012	2011
Operating revenues			
Interest and dividends income	\$ 3,206	\$ 3,273	\$ 3,340
Net increase (decrease) in the fair value of investments	(2,252)	520	(942)
Other miscellaneous income	26	25	28
Total operating revenues	<u>\$ 981</u>	<u>\$ 3,818</u>	<u>\$ 2,427</u>
Operating expenses			
Salaries and other administrative expenses	\$ 605	\$ 698	\$ 846
Net increase (decrease) in the present value of tuition benefits payable	385	(3,124)	18,933
Total operating expenses	<u>\$ 990</u>	<u>\$ (2,426)</u>	<u>\$ 19,779</u>
Operating income (loss)	<u>\$ (9)</u>	<u>\$ 6,244</u>	<u>\$ (17,352)</u>
Increase (Decrease) in net position	\$ (9)	\$ 6,244	\$ (17,352)
Net position - Beginning of fiscal year	<u>17,366</u>	<u>11,122</u>	<u>28,475</u>
Net position - End of fiscal year	<u>\$ 17,358</u>	<u>\$ 17,366</u>	<u>\$ 11,122</u>

**Interest and dividends income** decreased by \$0.07 million in fiscal year 2012-13 and decreased by \$0.07 million in fiscal year 2011-12. The decrease in fiscal year 2012-13 was attributed to unfavorable investment performance. The decrease in fiscal year 2011-12 was attributed to decreases in investments held during the fiscal year.

The **net increase (decrease) in the fair value of investments** decreased by \$2.8 million in fiscal year 2012-13 and increased by \$1.5 million in fiscal year 2011-12. The decrease in fiscal year 2012-13 was because of unfavorable investment performance. The increase in fiscal year 2011-12 was because of favorable investment performance. The actual investment rate of return was 0.62% in fiscal year 2012-13 and 2.2% in fiscal year 2011-12.

The **net increase (decrease) in the present value of tuition benefits payable** increased by \$3.6 million in fiscal year 2012-13 and decreased by \$22.1 million in fiscal year 2011-12. The increase and decrease in both fiscal years resulted from the change in the present value of the future tuition benefit obligation compared to actuarial tuition assumptions.

**Condensed Financial Information**  
**From the Statement of Cash Flows**  
Fiscal Years Ended September 30  
(In Thousands)

	2013	2012	2011
Net cash provided (used) by:			
Operating activities	\$ (13,364)	\$ (31,665)	\$ (41,076)
Investing activities	(10,742)	6,111	25,224
Net cash provided (used) - All activities	\$ (24,105)	\$ (25,554)	\$ (15,852)
Cash and cash equivalents - Beginning of fiscal year	51,632	77,186	93,038
Cash and cash equivalents - End of fiscal year	\$ 27,527	\$ 51,632	\$ 77,186

The **net cash used by operating activities** decreased by \$18.3 million in fiscal year 2012-13 and decreased by \$9.4 million in fiscal year 2011-12. The decreases in cash used by operating activities in both fiscal years were primarily the result of decreases in tuition contract payments to colleges and refund designees.

The **net cash provided by investing activities** decreased by \$16.9 million in fiscal year 2012-13 and decreased by \$19.1 million in fiscal year 2011-12. The decrease in cash provided by investing activities in fiscal year 2012-13 is the result of investments maturing and the proceeds being reinvested into new investment securities. The decrease in cash provided by investing activities in fiscal year 2011-12 resulted from the decreased amount of cash available for investing purposes.

Overall, the **cash and cash equivalents at the end of the fiscal year** decreased by \$24.1 million in fiscal year 2012-13 and decreased by \$25.6 million in fiscal year 2011-12.

### **Factors Impacting Future Periods**

It is expected that Michigan public universities will adopt higher tuition increases next year if State appropriated funds decrease.

MET Plans B and C reached the peak matriculation period during fiscal year 2005-06. During fiscal year 2013-14, 1,456 students will be eligible to begin using MET contracts to attend college along with 6,297 students currently in the process of using MET contracts. After fiscal year 2012-13, the number of students expected to enroll in college under MET Plans B and C will continue to decrease significantly because MET has fulfilled its contractual obligations for the majority of these contract holders and has not offered additional enrollments in these plans since 1990.

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# BASIC FINANCIAL STATEMENTS

MICHIGAN EDUCATION TRUST PLANS B AND C  
Statement of Net Position  
As of September 30

	2013	2012
<b>ASSETS</b>		
Current assets:		
Cash and cash equivalents (Notes 2 and 3)	\$ 27,526,951	\$ 51,632,310
Amounts due from MET Program (Plan D)	3,023,012	3,215,643
Amounts due from primary government	6,833,007	9,645,286
Interest and dividends receivable	622,709	888,739
Total current assets	\$ 38,005,678	\$ 65,381,979
Noncurrent assets:		
Investments (Note 3)	117,627,363	109,137,337
Total assets	\$ 155,633,041	\$ 174,519,316
 <b>LIABILITIES</b>		
Current liabilities:		
Tuition benefits payable (Note 4)	\$ 51,000,000	\$ 61,000,000
Compensated absences	8,802	7,418
Total current liabilities	\$ 51,008,802	\$ 61,007,418
Noncurrent liabilities:		
Tuition benefits payable (Note 4)	87,053,980	95,994,889
Compensated absences	212,640	150,537
Total liabilities	\$ 138,275,422	\$ 157,152,844
 <b>NET POSITION</b>		
Net position - Restricted	\$ 17,357,619	\$ 17,366,472
Total net position	\$ 17,357,619	\$ 17,366,472

The accompanying notes are an integral part of the financial statements.

**MICHIGAN EDUCATION TRUST PLANS B AND C**  
**Statement of Revenues, Expenses, and Changes in Net Position**  
**Fiscal Years Ended September 30**

	2013	2012
<b>OPERATING REVENUES</b>		
Interest and dividends income	\$ 3,206,408	\$ 3,273,398
Net increase (decrease) in the fair value of investments	(2,251,607)	519,832
Other miscellaneous income	26,100	25,012
Total operating revenues	\$ 980,901	\$ 3,818,241
<b>OPERATING EXPENSES</b>		
Salaries and other administrative expenses	\$ 604,925	\$ 698,365
Net increase (decrease) in the present value of tuition benefits payable	384,829	(3,124,392)
Total operating expenses	\$ 989,754	\$ (2,426,026)
Operating income (loss)	\$ (8,853)	\$ 6,244,268
Increase (Decrease) in net position	\$ (8,853)	\$ 6,244,268
Net position - Beginning of fiscal year	17,366,472	11,122,204
Net position - End of fiscal year	\$ 17,357,619	\$ 17,366,472

The accompanying notes are an integral part of the financial statements.

MICHIGAN EDUCATION TRUST PLANS B AND C  
Statement of Cash Flows  
Fiscal Years Ended September 30

	2013	2012
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>		
Interest and dividends received	\$ 3,472,438	\$ 3,010,579
Benefits paid	(19,325,738)	(28,969,407)
Administrative and other expenses paid	2,463,473	(5,731,330)
Application and other fees collected	26,100	25,012
Net cash provided (used) by operating activities	\$ (13,363,727)	\$ (31,665,146)
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
Purchase of investment securities	\$ (46,216,508)	\$ (55,191,905)
Proceeds from sale and maturities of investment securities	35,474,875	61,303,069
Net cash provided (used) by investing activities	\$ (10,741,633)	\$ 6,111,164
Net cash provided (used) - All activities	\$ (24,105,359)	\$ (25,553,983)
Cash and cash equivalents - Beginning of fiscal year	51,632,310	77,186,293
Cash and cash equivalents - End of fiscal year	\$ 27,526,951	\$ 51,632,310
<b>RECONCILIATION OF OPERATING INCOME (LOSS) TO NET CASH PROVIDED (USED) BY OPERATING ACTIVITIES</b>		
Operating income (loss)	\$ (8,853)	\$ 6,244,268
Adjustments to reconcile operating income (loss) to net cash provided (used) by operating activities:		
Unrealized and realized (gains) losses	2,251,607	(519,832)
Changes in assets and liabilities:		
Amounts due from MET Program (Plan D)	192,632	(186,366)
Amounts due from primary government	2,812,279	(4,819,626)
Interest and dividends receivable	266,030	(262,819)
Compensated absences	63,487	(26,972)
Tuition benefits payable	(18,940,909)	(32,093,799)
Net cash provided (used) by operating activities	\$ (13,363,727)	\$ (31,665,146)

The accompanying notes are an integral part of the financial statements.

## Notes to the Financial Statements

### Note 1 Basis of Presentation and Reporting Entity

#### a. Basis of Presentation

The financial statements of the Michigan Education Trust (MET) Plans B and C have been prepared in accordance with accounting principles generally accepted in the United States of America as applicable to governmental units.

#### b. Reporting Entity

MET was created under Act 316, P.A. 1986 (Sections 390.1421 - 390.1444 of the *Michigan Compiled Laws*), to operate a prepaid college tuition program. MET is governed by a 9-member Board of Directors that consists of 1 ex-officio member (the State Treasurer, acting as chair) and 8 public members who are appointed by the Governor with the advice and consent of the Senate. MET is administratively located within the Department of Treasury. The State Treasurer, as MET's agent, may not commingle funds and must maintain a separate bank account for MET. MET is a proprietary component unit of the State of Michigan and is reported as such in the *State of Michigan Comprehensive Annual Financial Report*. The accompanying financial statements present only MET Plans B and C. Accordingly, they do not purport to, and do not, present fairly the financial position and changes in financial position and cash flows of the State of Michigan or its component units, or MET Plan D, in accordance with accounting principles generally accepted in the United States of America as applicable to governmental units.

Act 316, P.A. 1986, as amended, empowers MET, on behalf of itself and the State of Michigan, to enter into a contract with a purchaser which provides that, in return for a specified actuarially determined payment, MET will provide a Michigan child's undergraduate tuition at any Michigan public university or community college. The purchase amount is based on several factors, including tuition costs, anticipated investment earnings, anticipated tuition rate increases, and the type of contract purchased.

MET offers a full benefits contract, a limited benefits contract, and a community college contract. MET's property, income, and operations have been statutorily exempted from all taxation by the State and its political subdivisions. The Act and the contracts specifically provide that the State is not liable if MET becomes actuarially unsound. In that event, the contracts provide for refunds to participants based on a proration of the remaining assets.

As of September 30, 2013, there have been 21 enrollment periods over 25 years for MET. The 1988, 1989, and 1990 enrollments are known as Plans B and C. The 1995, 1997, 1998, 1999, 2000, 2002, 2003, 2004, 2005, 2006, 2007 (two enrollment periods), 2008, 2009, 2010, 2011, 2012, and 2013 enrollments are known as Plan D. The Plan D enrollments are accounted for and reported separately from the Plans B and C enrollments. These financial statements report only Plans B and C enrollments. Separate financial statements and actuarial valuation of the Plan D enrollments are available from the MET office at P.O. Box 30198, Lansing, Michigan 48909.

## Note 2 Summary of Significant Accounting Policies

### a. Measurement Focus and Basis of Accounting

The financial statements contained in this report are prepared using the economic resources measurement focus and the accrual basis of accounting as provided by accounting principles generally accepted in the United States of America as applicable to governmental units. Under the accrual basis of accounting, revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of cash flows.

MET follows the accounting rules promulgated by the Governmental Accounting Standards Board (GASB).

b. Assets, Liabilities, and Net Position

- (1) Cash and Cash Equivalents: Cash and cash equivalents reported on the statement of net position include deposits with financial institutions and short-term investments with original maturities of less than three months used for cash management rather than investing activities.
- (2) Investments: MET's deposits and investments are held in a fiduciary capacity by the State Treasurer. Act 316, P.A. 1986, as amended, authorizes the MET Board of Directors to invest MET's assets in any instrument, obligation, security, or property that it considers to be appropriate. The Act also authorizes the pooling of MET's assets with assets of the State, such as the pension funds, for investment purposes. Investments are carried at fair value (see Note 3).
- (3) Liabilities: The actuarial present value of the future tuition benefits obligation is recorded as a current and noncurrent liability of MET (see Note 4).
- (4) Net Position: MET's net position represents the investment appreciation and the investment revenue in excess of the actuarial present value of the future tuition benefits obligation and expenses (see Note 4). Net position is restricted because of the contractual obligations that MET must adhere to on behalf of the purchasers and beneficiaries for which prepaid tuition was collected and invested. The enabling legislation for MET is Act 316, P.A. 1986, as amended. Section 17 of the Act indicates that the assets of MET shall be preserved, invested, and expended solely pursuant to and for the purposes set forth in the Act and shall not be loaned or otherwise transferred or used by the State for any purpose other than the purposes of the Act.

### Note 3 Deposits and Investments

a. General Information

In accordance with GASB Statement No. 40, *Deposit and Investment Risk Disclosures*, policies and practices with respect to custodial credit risk, foreign currency risk, interest rate risk, credit risk, and concentration of credit risk are discussed in the following paragraphs.

b. Deposits

(1) Custodial Credit Risk

Custodial credit risk for deposits is the risk that, in the event of the failure of a depository financial institution, MET will not be able to recover deposits or will not be able to recover collateral securities that are in the possession of an outside party. MET does not have a policy for custodial credit risk for deposits.

At the end of fiscal year 2012-13, the carrying amount of MET's deposits for Plans B and C and the amount reflected in the accounts of the banks was \$7,527,573. At the end of fiscal year 2011-12, the carrying amount of MET's deposits for Plans B and C and the amount reflected in the accounts of the banks was \$10,136,086. The September 30, 2013 and September 30, 2012 balances were covered by federal depository insurance or collateral held with MET's agent in MET's name and, therefore, were not exposed to custodial credit risk.

(2) Foreign Currency Risk

Foreign currency risk for deposits is the risk that changes in exchange rates will adversely affect the fair value of a deposit. As of September 30, 2013 and September 30, 2012, MET had no foreign deposits.

c. Investments

(1) Interest Rate Risk

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. MET does not have a policy to restrict interest rate risk for long-term investments.

The following table shows the fair value of investments for Plans B and C by investment type and in total (in millions) at September 30, 2013:

	Fair Value	Investment Maturities			
		Less Than 1 Year	1 to 5 Years	6 to 10 Years	More Than 10 Years
Investments:					
Commercial paper	\$ 20.0	\$ 20.0	\$	\$	\$
U.S. agencies - sponsored	3.8		3.8		
Corporate bonds and notes	113.9	29.0	74.4	10.5	
Total investments	<u>\$ 137.7</u>	<u>\$ 49.0</u>	<u>\$ 78.2</u>	<u>\$ 10.5</u>	<u>\$ 0</u>
Less investments reported as "cash equivalents" on statement of net position	<u>(20.0)</u>				
Total investments	<u>\$ 117.7</u>				
<u>As Reported on the Statement of Net Position</u>					
Noncurrent restricted investments	<u>\$ 117.7</u>				
Total investments	<u>\$ 117.7</u>				

The following table shows the fair value of investments for Plans B and C by investment type and in total (in millions) at September 30, 2012:

	Fair Value	Investment Maturities			
		Less Than 1 Year	1 to 5 Years	6 to 10 Years	More Than 10 Years
Investments:					
Commercial paper	\$ 41.5	\$ 41.5	\$	\$	\$
U.S. agencies - sponsored	3.9		3.9		
Corporate bonds and notes	105.2	35.9	65.0	4.3	
Total investments	\$ 150.6	\$ 77.4	\$ 68.9	\$ 4.3	\$ 0
Less investments reported as "cash equivalents" on statement of net position	(41.5)				
Total investments	\$ 109.1				
<u>As Reported on the Statement of Net Position</u>					
Noncurrent restricted investments	\$ 109.1				
Total investments	\$ 109.1				

(2) Credit Risk

Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. MET limits investments in commercial paper, at the time of purchase, to the top two ratings issued by two national rating services: ratings of A-1 and A-2 from Standard & Poor's and ratings of P-1 and P-2 from Moody's Investors Service. MET's policy also limited investments in corporate bonds and mutual bond funds, at the time of purchase, to the top four ratings of the two rating services: ratings of AAA, AA, A, and BBB from Standard & Poor's and ratings of Aaa, Aa, A, and Baa from Moody's Investors Service.

As of September 30, 2013, the fair value and credit quality ratings of investments were as follows:

Investment	Fair Value	Credit Quality Rating	
		Standard & Poor's	Moody's Investors Service
American Honda Finance Corp.	\$ 2,533,900	A+	A1
AMGEN Inc.	3,044,556	A	Baa1
Apple Inc.	3,983,804	AA+	Aa1
AT&T Inc.	3,090,072	A-	A3
Avon Products, Inc.	2,520,621	BBB-	Baa2
Bank of Montreal	3,002,673	A+	Aa3
Bank of New York Mellon Corp.	2,748,955	A+	Aa3
Berkshire Hathaway Inc.	3,110,646	AA	Aa2
Cadbury Schweppes U.S. Finance LLC	4,000,000	BBB-	WR
Costco Wholesale Corp.	1,933,306	A+	A1
Duke Energy Corp.	3,055,563	BBB	Baa1
Estee Lauder Companies Inc.	3,359,733	A	A2
Federal Home Loan Bank	3,804,315	AA+	Aaa
General Electric Capital Corp.	12,291,308	AA+	A1
Georgia Power Co.	5,003,245	A	A3
Illinois Tool Works Inc.	3,067,674	A+	A2
John Deere Capital Corp.	3,002,589	A	A2
JPMorgan Chase & Co.	2,632,423	A	A2
Kayne Anderson Capital Advisors, L.P.	5,066,000	Not Rated	Not Rated
Manufacturers & Traders Trust Co.	2,989,293	A	A2
Medtronic Inc.	1,963,492	A+	A2
Oracle Corp.	3,176,768	A+	A1
PACCAR Financial Corp.	4,014,468	A+	A1
Procter & Gamble Company	3,121,803	AA-	Aa3
Public Service Electric & Gas Co.	4,015,068	A	A1
Sherwin-Williams Co.	3,087,690	A	A3
Target Corp.	2,846,550	A+	A2
Texas Instruments Inc.	4,828,910	A+	A1
Toyota Motor Credit Corp.	3,020,832	AA-	Aa3
Tyco Electronics Group S.A.	2,031,198	BBB+	Baa2
Verizon Communications Inc.	2,103,000	BBB+	Baa1
Wells Fargo & Company	4,263,060	A+	A2
Wisconsin Electric Power Co.	4,913,850	A-	A2
Total fair value	<u>\$117,627,363</u>		

As of September 30, 2012, the fair value and credit quality ratings of investments were as follows:

Investment	Fair Value	Credit Quality Rating	
		Standard & Poor's	Moody's Investors Service
American Honda Finance Corp.	\$ 2,549,008	A+	A1
AT&T Corp.	2,566,335	A-	WR
AT&T Inc.	3,152,280	A-	A2
Avon Products, Inc.	2,486,808	BBB-	Baa1
Bank of America Corp.	4,092,896	A-	Baa2
Berkshire Hathaway Inc.	3,152,313	AA+	Aa2
Cadbury Schweppes U.S. Finance LLC	4,160,420	BBB-	Baa2
Caterpillar Financial Services Corp.	4,434,601	A	A2
Duke Energy Corp.	3,219,945	BBB	Baa2
Duke Energy Ohio Inc.	2,094,846	A	A2
Eaton Corp.	3,079,455	A-	A3
Estee Lauder Companies Inc.	3,557,325	A	A2
Federal Home Loan Bank	3,910,624	AA+	Aaa
General Electric Capital Corp.	5,534,854	AA+	A1
General Electric Co.	10,432,670	AA+	A1
Georgia Power Co.	5,012,975	A	A3
Illinois Tool Works Inc.	3,207,906	A+	A1
JPMorgan Chase & Co	1,500,000	A	WR
JPMorgan Chase	2,665,625	A	A2
Oracle Corp.	1,816,367	A+	A1
PACCAR Financial Corp.	4,010,420	A+	A1
Procter & Gamble Company	3,209,412	AA-	Aa3
Public Service Colorado	2,000,000	A	WR
Public Service Electric & Gas Co.	4,027,468	A-	A1
Sherwin-Williams Co.	3,152,457	A	A3
Target Corp.	2,982,629	A+	A2
Tyco Electronics Group S.A.	2,131,750	BBB	Baa2
Verizon Virginia Inc.	2,545,990	A-	WR
Volkswagen International Finance N.V.	3,029,430	A-	A3
Wells Fargo & Company	9,420,530	A+	A2
Total fair value	<u>\$109,137,337</u>		

(3) Custodial Credit Risk

Custodial credit risk for investments is the risk that, in the event of the failure of the counterparty to a transaction, MET will not be able to recover the value of its investment or collateral securities that are in the possession of an outside party. MET's investments are registered in its name and, therefore, are not subject to custodial credit risk. MET does not have an investment policy for custodial credit risk.

(4) Concentration of Credit Risk

Concentration of credit risk is the risk of loss attributed to the magnitude of MET's investments with a single issuer. MET does not have a policy to limit the concentration of credit risk. At September 30, 2013, MET had the following investments that represented 5% or more of total investments:

Investment	Fair Value	Credit Quality Rating	
		Standard & Poor's	Moody's Investors Service
General Electric Capital Corp.	\$ 12,291,308	AA+	A1

At September 30, 2012, MET had the following investments that represented 5% or more of total investments:

Investment	Fair Value	Credit Quality Rating	
		Standard & Poor's	Moody's Investors Service
General Electric Capital Corp.	\$ 5,534,854	AA+	A1
General Electric Co.	\$ 10,432,670	AA+	A1
Wells Fargo & Company	\$ 9,420,530	A+	A2

(5) Foreign Currency Risk

Foreign currency risk for investments is the risk that changes in exchange rates will adversely affect the fair value of investments. As of September 30, 2013 and September 30, 2012, MET had no investments subject to foreign currency risk.

Note 4 Tuition Benefits Payable

The standardized measurement of the total benefits obligation of MET is the actuarial present value of the future tuition benefits obligation that will be paid in future years. The tuition benefits obligation is actuarially calculated by projecting the weighted average tuition cost, including mandatory fees, at the assumed annual rate of increase and then calculating the expected present value of the future distributions from MET based on the investment income and discount rate assumptions. The following table shows the net value of total assets less compensated absences, the present value of total tuition benefits obligation, and the net assets of MET Plans B and C (in millions) as of September 30:

	<u>2013</u>	<u>2012</u>
Net value of total assets less compensated absences	\$155.4	\$174.4
Present value of total tuition benefits obligation	<u>138.1</u>	<u>157.0</u>
Net value of assets in excess of tuition benefits obligation	<u>\$ 17.3</u>	<u>\$ 17.4</u>
Net value of assets as a percentage of total tuition benefits obligation	112.6%	111.1%

The most important assumptions used in the actuarial valuations include the following:

- (1) The investment yield that is applied to expected future cash flows to determine present value was 0.90% as of September 30, 2013 and 1.31% as of September 30, 2012. This investment yield approximates the expected investment earnings over the lifetime of the present tuition benefit contracts. It is premised that expected benefit payments will be diversified in duration to allow MET to invest at the assumed investment yield of 0.90% and to also be able to liquidate its investments in order to meet future benefit payments while still earning the investment yield of 0.90%.
- (2) For fiscal year 2012-13, the MET Board of Directors considered the relationship of tuition increases to the consumer price index in determining

the tuition increase assumption of 7.10% for year 1 through year 4 and 4.50% for year 5 and beyond. For fiscal year 2012-13, the projected tuition increase was 7.10% compounded annually for all future years.

- (3) There was no tax effect from federal income tax.
- (4) MET will pay 110% of the MET weighted average tuition in benefits and refunds.

Presented below are the key assumptions used in the actuarial valuations for Plans B and C:

	Fiscal Years				
	2012-13	2011-12	2010-11	2009-10	2008-09
Tuition increase:					
Years 1 through 4	7.10%				
Years 1 through 5		7.10%	7.10%	6.50%	6.50%
Year 5 and beyond	4.50%				
Year 6 and beyond		4.50%	7.10%	6.50%	6.50%
Present value discount rate	0.90%	1.31%	1.38%	2.20%	2.20%

The following summarizes the tuition benefits payable (in millions) as of and for the fiscal years ended September 30, 2013 and September 30, 2012:

Balance at September 30, 2011	\$189.1
Provision for net increase (decrease) in present value of tuition benefits payable	(3.1)
Payments	(29.0)
Balance at September 30, 2012	<u>\$157.0</u>
Provision for net increase (decrease) in present value of tuition benefits payable	0.4
Payments	(19.3)
Balance at September 30, 2013	<u><u>\$138.1</u></u>

The amounts due within one year for tuition benefits payable for the fiscal years ended September 30, 2013 and September 30, 2012 are \$51.0 million and \$61.0 million, respectively. The actuarial assumptions described in this note have a significant impact on the tuition benefits liability. Actual results may differ from the assumptions utilized.

Note 5 Tax Status

On November 8, 1994, the U.S. Court of Appeals for the Sixth Circuit ruled that MET is an integral part of the State of Michigan; thus, the investment income realized by MET is not currently subject to federal income tax.

Distributions made in excess of contributions (whether to the refund designee, the beneficiary, or a college on behalf of the beneficiary) are taxable income to the refund designee or the beneficiary. After January 1, 2002, these excess distributions are no longer subject to federal income tax if used for qualified higher education expenses. The federal Pension Protection Act enacted in August 2006 provides permanent tax exemption for Internal Revenue Code Section 529 qualified tuition programs.

On August 20, 1996, the Small Business Job Protection Act of 1996 (known as the "1996 Tax Act") was signed into law. The 1996 Tax Act included a provision adding a new section to the Internal Revenue Code of 1986 defining "qualified tuition programs." A qualified tuition program is generally exempt from income tax but is subject to unrelated business income tax. MET has no unrelated business income.

In May 1997, MET submitted a request for ruling to the Internal Revenue Service (IRS) for verification that MET is in compliance with the 1996 Tax Act. On December 23, 1997, the IRS issued a favorable ruling, which confirms that MET meets the requirements for exemption from federal income tax as a state qualified tuition program described in Section 529 of the Internal Revenue Code.

Note 6 Risk Management

MET participates in the State of Michigan's (primary government) risk management program. The State is self-insured for most general liability and

property losses; portions of its employee insurance benefit and bonding programs; and automobile liability, workers' compensation, and unemployment claims. The State Sponsored Group Insurance Fund and Risk Management Fund (internal service funds) have been established by the State to account for these self-insured risk management programs. As a participant, MET recognizes expenses for payments made to the State in a manner similar to purchasing commercial insurance. Charges to finance the self-insured programs are based on estimates of amounts needed to pay prior and current year claims as determined annually by the Department of Technology, Management, and Budget.

#### Note 7 Pension Plans

Plan Descriptions - MET participates in the State of Michigan's defined benefit and defined contribution pension plans that cover most State employees, as well as related component units such as MET. The defined benefit and defined contribution pension plans are part of the Michigan State Employees' Retirement System administered by the Office of Retirement Services, Department of Technology, Management, and Budget. Participants in each plan are eligible for retirement, healthcare, disability, and death benefits upon meeting certain vesting requirements. The Michigan State Employees' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the defined benefit plan. That report is available on the State's Web site at <<http://www.michigan.gov/ors>>. The financial report for the defined contribution plan may be obtained by writing to the Office of Retirement Services, Department of Technology, Management, and Budget, 7150 Harris Drive, P.O. Box 30171, Lansing, Michigan 48909 or by calling (517) 322-5103.

Funding Policy - The State funds pension and other postemployment benefits on a prefunded basis. For the defined benefit plan, MET was required to contribute 5.39% of payroll for the employer portion of defined benefit pension. Employees in the defined benefit plan were required to contribute 4.0% of their compensation for pension benefits. For the defined contribution plan, MET was required to contribute 4.0% of payroll with an additional match of up to 3.0%. Employees in the defined contribution plan are not required to contribute

to the plan but may contribute up to the IRS allowed maximum. MET was required to contribute 42.15% of payroll for the employer cost of other postemployment benefits. MET transferred \$30,914, \$27,928 and \$0.4 million of its payroll costs for its employer contribution for the defined benefit plan, defined contribution plan, and other postemployment benefits in fiscal year 2012-13 and \$0.3 million, \$21,758, and \$88,260 for its employer contribution for the defined benefit plan, defined contribution plan, and other postemployment benefits in fiscal year 2011-12. The contribution requirements of plan members and MET are established and may be amended by the State Legislature. The State Legislature establishes the extent to which the employer and employees are required to make contributions and establishes the benefit provisions for the plans.

MET participates in the State of Michigan's postemployment benefits. State statutes provide retired employees with other postemployment benefits, such as health, dental, vision, and life insurance coverage based on vesting and other requirements. The State pays 80% of the cost of health insurance for retired employees who were hired on or before March 30, 1997. For retired employees hired after March 30, 1997 and before January 1, 2012, the State pays between 30% and 80% of the cost of health insurance dependent upon years of service. Employees hired on or after January 1, 2012 will not be eligible for any retiree health insurance coverage but will receive a personal healthcare fund where they will contribute up to 2% of their compensation into a 401(k) or 457 account, earning a matching 2% employer contribution. Also, the employee will receive a credit into a health reimbursement account at termination of employment if he or she has at least 10 years of service at termination. The credit will be \$2,000 for participants who are at least 60 years old or \$1,000 for participants who are less than 60 years old at termination.

INDEPENDENT AUDITOR'S REPORT ON  
INTERNAL CONTROL AND COMPLIANCE



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THOMAS H. MCTAVISH, C.P.A.  
AUDITOR GENERAL

## Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters

Mr. R. Kevin Clinton, State Treasurer and Chair  
Michigan Education Trust Board of Directors  
and  
Ms. Robin R. Lott, Executive Director  
Michigan Education Trust  
Richard H. Austin Building  
Lansing, Michigan

Dear Mr. Clinton and Ms. Lott:

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the basic financial statements of the Michigan Education Trust Plans B and C, a discretely presented component unit of the State of Michigan, as of and for the fiscal years ended September 30, 2013 and September 30, 2012 and the related notes to the basic financial statements and have issued our report thereon dated December 16, 2013.

### **Internal Control Over Financial Reporting**

In planning and performing our audit of the basic financial statements, we considered the Michigan Education Trust's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the basic financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Michigan Education Trust's internal control. Accordingly, we do not express an opinion on the effectiveness of the Michigan Education Trust's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's basic financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified. We did identify a deficiency in internal control, as described in Finding 1, that we consider to be a significant deficiency.

### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Michigan Education Trust Plans B and C basic financial statements are free from material misstatement, we performed tests of the Michigan Education Trust's compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

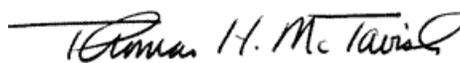
### **Michigan Education Trust's Response to Finding**

The Michigan Education Trust's preliminary response to the finding identified in our audit is included in the body of our report. The Michigan Education Trust's response was not subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we express no opinion on it.

### **Purpose of This Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Sincerely,



Thomas H. McTavish, C.P.A.  
Auditor General  
December 16, 2013

FINDING, RECOMMENDATION, AND  
AGENCY PRELIMINARY RESPONSE

## **FINDING**

### **1. Monitoring of User Access Rights**

The Michigan Education Trust (MET) had not implemented a formal process to regularly monitor user access rights to the Prepaid Records Information Management Administrative (PRIMA) System. Without a formal process, MET cannot ensure that it maintains a proper segregation of duties\* over the administration of MET benefits so that users do not have conflicting access rights and are not acting outside of their job responsibilities.

The Control Objectives for Information and Related Technology\* (COBIT) framework states that management should establish standards that enforce appropriate segregation of duties.

MET uses the PRIMA System to administer MET benefits, including processing MET contract applications, maintaining contract information, and calculating tuition payments. We reviewed access rights assigned to MET users. Our review did not disclose any users with inappropriate access rights at the time of our audit. However, MET management should establish a process to regularly monitor user access to ensure that inappropriate access has not been granted.

We noted a similar condition in our prior audit. In response to that audit report, MET stated that it would develop a plan to establish an access rights process to ensure segregation of duties over the administration of MET benefits. MET complied with the recommendation as it related to ensuring least-privilege access; however, MET did not comply with the recommendation as it related to monitoring.

## **RECOMMENDATION**

We again recommend that MET implement a formal process to regularly monitor user access rights to the PRIMA System.

## **AGENCY PRELIMINARY RESPONSE**

MET agrees with the recommendation and informed us that it had developed a process to monitor user access rights; however, the process had not been formally documented until the end of the audit period. In the interim, MET managerial staff informed us that they conducted regular monitoring of user access rights using ad hoc reports.

\* See glossary at end of report for definition.

# GLOSSARY

## Glossary of Abbreviations and Terms

Control Objectives for Information and Related Technology (COBIT)	A framework, control objectives, and audit guidelines published by the IT Governance Institute as a generally applicable and accepted standard for good practices for controls over information technology.
deficiency in internal control over financial reporting	The design or operation of a control that does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis.
financial audit	An audit that is designed to provide reasonable assurance about whether the basic financial statements of an audited entity are presented fairly, in all material respects, in accordance with the applicable financial reporting framework.
Governmental Accounting Standards Board (GASB)	An arm of the Financial Accounting Foundation established to promulgate standards of financial accounting and reporting with respect to activities and transactions of state and local governmental entities.
internal control	A process, effected by those charged with governance, management, and other personnel, designed to provide reasonable assurance about the achievement of the entity's objectives with regard to the reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations.
IRS	Internal Revenue Service.
material misstatement	A misstatement in the basic financial statements that causes the statements to not present fairly the financial position or the changes in financial position, and, where applicable, cash flows

thereof, in accordance with the applicable financial reporting framework.

material weakness in internal control over financial reporting

A deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the financial statements will not be prevented, or detected and corrected, on a timely basis.

MET

Michigan Education Trust.

PRIMA System

Prepaid Records Information Management Administrative System.

segregation of duties

Assigning different people the responsibilities of authorizing transactions, recording transactions, and maintaining custody of assets to reduce the opportunities to allow any person to be in a position to both perpetrate and conceal errors or fraud in the normal course of his or her duties. Proper segregation of duties requires separating the duties of reporting, review and approval of reconciliations, and approval and control of documents.

significant deficiency in internal control over financial reporting

A deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

unmodified opinion

The opinion expressed by the auditor when the auditor, having obtained sufficient appropriate audit evidence, concludes that the basic financial statements are presented fairly, in all material respects, in accordance with the applicable financial reporting framework.







