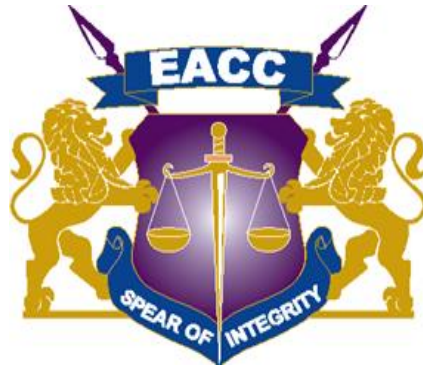


ETHICS AND ANTI-CORRUPTION COMMISSION



REPORT OF THE EXAMINATION INTO THE OPERATIONAL AND FINANCIAL MANAGEMENT SYSTEMS, POLICIES, PROCEDURES AND PRACTICES OF MOI UNIVERSITY



Corruption Prevention Department

May, 2023

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LIST OF ABBREVIATIONS

CBAs	Collective Bargaining Agreements
CCTV	Closed Circuit Television
CHS	College of Health Sciences
CRA	Corruption Risk Assessment
CUE	Commission for University Education
EACC	Ethics and Anti-Corruption Commission
ERP	Enterprise Resource Planning
FY	Financial Year
HR	Human Resources
ICT	Information and Communication Technology
ISO	International Organization for Standardization
MOU	Memoranda of Understanding
NG	National Government
PDN	Public Health Dentistry and Nursing
PFM	Public Finance Management
RMEDIA	Resource Mobilization, Enterprise Development and Institutional Advancement
SCAC	State Corporations Advisory Committee
SMIS	Student Management Information system
VC	Vice Chancellor

EXECUTIVE SUMMARY

This is a report of the examination into the Operational and Financial management systems, policies, procedures and practices of Moi University. The examination was carried out by a team of prevention officers from Ethics and Anti-Corruption Commission between 26th October, 2022 and 10th November, 2022. The aim of the examination was to identify loopholes, weaknesses and avenues that may contribute to the perpetuation of corrupt and unethical practices at Moi University and make appropriate recommendations.

To achieve this, the examination team:

- i) Conducted formal and informal interviews of University's staff and stakeholders;
- ii) Undertook content analysis and review of various documents such as policies, regulations and circulars;
- iii) Reviewed operational and financial records;
- iv) Observed work processes; and
- v) Conducted inspection of sampled projects undertaken by the University.

The examination covered the areas of: Financial Management; Supply Chain Management; Human Resource Management; Project Management; Information and Communication Technology, Administration, Academics, Research, Extension and Student Affairs and Records Management.

The findings of the examination indicate that there are weaknesses, loopholes and inefficiencies that may lead to corruption and other irregularities at the University. The identified weaknesses, loopholes, inefficiencies and recommendations have been presented in part two of this report as follows:

Legal and Policy Framework: Key findings include failure to have a strategic plan in place; failure to review and conform to the masterplan prepared in the year 1987; use of an outdated 2015-2018 Academic Calendar; and failure to developed policies and procedure manuals such as: procurement manual; fees payment policy; resource mobilization policy; creditors management policy; records management policy among others.

Recommendations include: expedite the development and implementation of the University strategic plan, develop and publish the University Academic Calendar to provide accurate information on the programmes offered by the University; review and comply

with the University Masterplan and develop, approve and implement policies, guidelines and procedures.

Governance and Administration: some of the findings in this section include: high number of unscheduled council meetings and failure to register complaints received electronically through the official email and social media accounts.

Recommendations include: adherence to the circular from Head of Public Service on Management of State Corporations and ensuring that complaints received electronically are registered, processed through the Complaints Management Committee, investigated and action taken.

Financial Management: Findings in this section include failure to establish the Public Finance Management Standing Committee; failure to fully implement ERP finance module; failure to maintain accurate record of students' fee debtors; failure to maintain memorandum cashbooks; outstanding imprests beyond stipulated surrender period and no interest charged; lack of a creditors' payment policy and creditors management plan and lack of a comprehensive fixed assets register.

Recommendations include: establishment of the Public Finance Management Standing Committee; fully implement the ERP finance module; develop and implement strategies for collection of outstanding students' fee debts; maintenance of memorandum cash book by holders of standing imprest; Imprests are accounted for and surrendered by staff within seven working days after returning to their duty station and outstanding imprests are recovered from the defaulting officer with an interest at the prevailing Central Bank rate; development and implementation of creditor's payment policy and creditors management plan; and maintenance of a comprehensive Fixed Assets Register.

Audit and Risk Management: The following weaknesses were identified; failure to develop the Internal Audit strategic plan to guide the university on risk-based audit assessment and failure to implement recommendations in the audit report.

Recommendations include developing an Internal Audit Strategic Plan and ensuring that recommendations in the audit report are implemented.

Supply Chain Management: Weaknesses in this area include: Interference with tendering process; irregular variation of projects costs and delay in termination of contracts for leased facilities, vacation of buildings and hand over of premises.

Recommendations include: Adherence to Section 30 (d) of the Public Procurement and Asset Disposal Regulations, 2020 which prohibits direct communication with any of the tenderers participating in a tender; processing of contract variations through the evaluation committee and where variations result in an increment of the contract price by more than 25%, such variations should be tendered for separately; and ensuring prudent contract management to avert losses and litigations.

Project management: Some of the findings in this section include: Failure to maintain retention account for each project and delay in completion of projects.

Recommendations include: Ensuring retention accounts are maintained for each project and completion of projects within schedule.

Human Resource Management: Weaknesses in this area include; failure to revise the staff establishment; absence of succession management plan and failure to undertake work plan and setting of performance targets under performance management.

Recommendations include: expedite the process of review and approval of the Staff Establishment; development and operationalization of succession management system and ensuring that performance management framework is undertaken in line with the Public Service Commission (Performance Management) Regulations, 2021 and the Human Resource Manual.

Information and Communication Technology: Some of the findings and observations in this section include lack of University wide guidance on management of Information systems and delay in implementation of the Enterprise Resource Planning System and resolution of emerging issues.

Recommendations include: Issuance of guidance on acquisition, development and management of Information Systems; and ensuring the implementation of the ERP system is fully completed and outstanding issues resolved.

Academics, Research, Extension and Student Affairs: Key finding in this section is on non-adherence of the Rules and Regulations Governing Undergraduate Examinations, Graduation and Certification.

Recommendations include: ensuring that all administrators of examination adhere to the University 'Common Rules and Regulations Governing Undergraduate Examinations, Graduation and Certification' and 'Rules and Regulations Governing the Conduct and

Discipline of Students, 7th Edition'. Further, employees found culpable of contravening the provisions should be held accountable for errors committed.

Records Management: Findings and observations in this area include: Lack of a records management policy; lack of designated confidential registry and lack of adequate storage space and facilities.

Recommendations include: Development and implementation of a records management policy providing guidelines for creation, classification, physical movement, appraisal, retention, disaster management and disposal of records for the University; establishment of confidential registry and provision of adequate space for maintenance and storage of records.

The Ethics and Anti-Corruption Commission expects the University to immediately embark on the implementation of the recommendations made in this Report. This will include preparation of an implementation plan to be submitted to EACC upon presentation of the report. EACC and the University will thereafter continuously monitor the implementation process.

1.0 INTRODUCTION

Moi University, was established in 1984 as the second public university in Kenya by the Moi University Act, 1984 (repealed by the Universities Act No. 42 of 2012). The Universities Act No. 42 of 2012 gives the mandate and powers to the Commission for University Education (CUE) over the governance of public and private universities on matters of general policy on higher education.

The University is located in Kesses, 35 kilometers from Eldoret Town, and 310 kilometers northwest of Nairobi. Since 1984, the University has experienced phenomenal growth leading to the establishment of several constituent colleges across the country. Many of these constituent colleges have since grown to be fully fledged Universities namely; Maseno University, Masinde Muliro University of Science and Technology (MMUST), Maasai Mara University (Mmarau), University of Kabianga (UoK), University of Eldoret (UoE), Karatina University, Rongo University, Garissa University and Alupe University.

The University governance structure consists of Moi University Council, The Moi University Senate and; the Management Board whose roles and functions are set out in the Charter and the Statutes. The University management comprises of The Vice – Chancellor; The Deputy Vice - Chancellor - Academics, Research, Extension and Student Affairs; The Deputy Vice - Chancellor - Administration, Planning and Strategy; The Principal, College of Health Sciences; Chief Finance Officer; and the Senior Legal Officer.

Moi University has 14 Schools namely; Agriculture and Natural Resources, Arts and Social Sciences, Business and Economics, Dentistry, Education, Engineering, Graduate Studies, Information Sciences, Law, Medicine, Nursing, Public Health, Tourism, Hospitality and Events Management, and Science and Aerospace Studies. In addition, it has three (3) Directorates, namely; Information Communication Technology, Quality Assurance, Compliance and Performance Contracting, and Resource Mobilization, Enterprise Development and Institutional Advancement (RMEDIA).

Moi University takes pride in its Centres of Excellence in the following fields, namely; Centre of East and South African-German, Centre of Excellence for Educational Research Methodologies and Management (CERM-ESA), Centre of Excellence in Phytochemicals, Textile and Renewable Energy (ACE II-PTRE), and Cluster Centre of Excellence in African Studies (ACC). The University envisions being a Centre of Excellence in Aerospace Studies, Information Communication Technology and Arabic Studies.

The University owns the following commercial businesses; Rivatex East Africa Limited, Innovation Firm Limited and MU Technologies, which is a plant that manufactures and assembles ICT/ digital devices.

In the 2017-2022 Strategic Plan, the University had set out to: deliver an outstanding and innovative educational experience; conduct outstanding research and creative work for the public good; secure the resources to achieve the vision; design viable programmes and activities aimed at enhancing students welfare; construct and revamp the physical facilities and ICT infrastructure; and sustain an appropriate Quality Assurance and Performance Management systems among other strategic objectives. The University is in the process of reviewing implementation of the strategic plan, 2017-2022

From 83 students in 1984, the University currently has a student population of 39,786 with a staff component of 3,000 being both academic and administrative. Moi University graduands have grown from twenty (20) in 1985 to two thousand, nine hundred and ninety-nine (2,999) in 2021 evidencing an invaluable contribution in higher education for the country. At the time of the Examination, Moi University had one constituent college namely Bomet University College (BUC) and the following campuses: Main Campus (Kesses), Nairobi Campus, Coast Campus, and Eldoret Town Campus.

The Ethics and Anti-Corruption Commission (EACC) is mandated to prevent corruption by ensuring that public institutions are managed through systems that offer no room for corrupt practices. This mandate is provided for in section 11 (1) (g) and (i) of the Ethics and Anti-Corruption Act, 2011, which states that "in addition to the functions of the Commission under Article 252 and Chapter six of the Constitution, the Commission shall:

- i) 11(1) (g) – advise, on its own initiative, any person on any matter within its functions; and
- ii) 11(1) (i) – subject to Article 31 of the Constitution, monitor the practices and procedures of public bodies to detect corrupt practices and to secure the revision of methods of work or procedures that may be conducive to corrupt practices.

The Commission, through the Department of Corruption Prevention, undertook an examination into the Operational and Financial management systems, policies, procedures and practices of Moi University between 26th October, 2022 and 10th November, 2022. The aim of the examination was to identify loopholes, weaknesses and avenues that may contribute to the perpetuation of corrupt and unethical practices at Moi University and make appropriate recommendations.

1.1 Problem Statement

The Auditor General report on Moi University for the year ended 30th June 2020 indicated that there were pending bills totaling to Kshs. 1,109,468,194 as at 30th June, 2020. At the time of the Examination, the University's had accumulated debt of upto Kshs. 6,168,494,570.00.

Other issues include: Sustainability of the university as a going concern; High Debts levels crippling operations of the university; Un-remitted pension and other statutory deductions; Stalled projects; Loss making commercial ventures among others.

1.2 Justification

The reports highlighted above points to the financial and operational challenges in the University, making it technically insolvent; consequently, paralyzing operations at the University.

Examination into systems, policies procedures, processes and practices of works of Moi University identified weaknesses and corruption loopholes, which informed recommendations to seal the loopholes. This will also promote integrity and enhance transparency and accountability.

1.3 Objective

The objective of the examination was to examine areas in the operational and financial management of the University that may be susceptible to corruption and offer appropriate advice on ways and means of managing the identified weaknesses in order to prevent corruption and enhance service delivery.

1.4 Terms of Reference

The terms of reference for the Examination team were to:

- i) Study the existing policies, procedures and methods of work;
- ii) Identify weaknesses, loopholes and avenues for corruption in the operational and financial management; and
- iii) Prepare a report of findings and recommendations on how to seal identified corruption loopholes in the operational and financial management of Moi University.

1.5 Methodology

In order to effectively address the above objective, the following methodology was applied:

- i) Formal and informal interviews of University's staff and stakeholders;
- ii) Content analysis and review of various documents such as policies, regulations and circulars;
- iii) Review of the operational and financial records;
- iv) Observations of work processes; and
- v) Inspection of sampled projects undertaken by the University.

1.6 Scope of the Examination

The scope of the examination covered operations and financial management of the University including; Policy and Legal Framework, Finance, Procurement, Asset Management, Human Resource Management, Administration, Information and Communication Technology (ICT) and Internal Audit functions at the headquarters of Moi University in Kesess, Eldoret Campus.

2.0 FINDINGS AND RECOMMENDATIONS

2.1 Legal and Policy Framework

Strategic Plan

1. The University's Strategic Plan for 2015-2022 had expired by June 2022. The university had undertaken the evaluation of the 2015-2022 Strategic Plan. During the examination the University was in the process of preparing the Strategic Plan for the year 2022 – 2027. Failure to have a strategic plan in place is a weakness that leads to lack of strategic direction in achieving the objectives of the University resulting to discretion in planning, budgeting and execution of programs and activities in the university.

The Vice Chancellor should ensure the development of the University strategic plan is expedited and implemented.

University Masterplan

2. The masterplan is a long-term spatial plan that provides a conceptual layout to guide in growth and development. The University's masterplan for main campus land spanning over 3,000 acres was prepared in the year 1987. The examination team noted that, the university had not reviewed the masterplan for the last 35 years. Further, some developments undertaken by the University were not in conformity with the existing masterplan. For instance, the university had constructed three main gates in different locations.

Failure to review and conform to the masterplan can lead to haphazard developments resulting to wastage of public funds and underutilization of the land.

The Vice Chancellor should ensure the University Masterplan is periodically reviewed and complied with during developments

University Calendar

3. The University Academic Calendar is a document issued for the general guidance of staff and students of the University and any other person interested in the programmes offered. At the time of examination, the university was using an outdated 2015 -2018 Academic Calendar. Further, the University had carried out the rationalization and harmonization of teaching staff, courses/ units and departments resulting to restructuring of academic programmes.

Failure to develop and publish an up-to-date academic calendar is a weakness that can lead to misleading information and can provide opportunities for perpetuation of bribery and extortion.

The Vice Chancellor should ensure that the University Academic Calendar is developed and published on time to provide accurate information on the programmes offered by the University.

Policies and Procedure Manuals

4. The University had developed policies, procedure manuals and guidelines to guide operations in various functional areas. Other policies and procedure manuals were at various stages of development as shown Appendix I. However, the University had not developed policies and procedure manuals such as procurement manual; fees payment policy; resource mobilization policy; creditor's management policy; records management policy among others.

Lack of clearly documented policies and procedures is a loophole for the exercise of discretionary powers in decision-making and service delivery.

The Vice Chancellor should ensure that policies, guidelines and procedures are developed, approved and implemented.

MOU between Moi University and Other Institutions

5. Moi University has entered into Memoranda of Understanding (MOU) with other institutions on consultancy, research and capacity building purposes. A status report as at 3rd June 2022 showed that 19 out of 90 MOUs (21%) were due for renewal. The renewal process had not been initiated even though the respective agreement periods had lapsed between 2014 and 2019. Further the University had no policy or framework on management of MOUs, specific budgetary allocations and monitoring and evaluation of the engagement. These are weaknesses that can lead to abuse of MOUs for personal gain, possible exploitation by the partners and wastage of public funds,

The Vice Chancellor should ensure that a policy framework including monitoring and evaluation of the MOUs with other institutions is developed and implemented.

2.2 Governance and Administration

Functional Structures

6. The examination team noted that some functions were not placed in the corresponding departments. For instance, risk management function was placed at Internal Audit (instead of Quality Assurance, Compliance and Performance Contract, the Payroll function was being handled by finance instead of human resource and the code of conduct was administered in the integrity office instead of human resource. These are weaknesses that can lead to lack of clarity, confusion and double allocation of resources leading to poor service delivery.

The Vice Chancellor should align the university roles and functions to corresponding departments for efficiency and optimal utilization of resources

Council Meetings

7. The University prepares a Council Almanac (schedule of meetings) for each financial year, showing planned meeting dates and agenda. The examination team conducted a survey on Council meetings held between July 2021 and October 2022, and noted that the number of meetings of council exceeded the allowed limits. For instance;
 - i) The University had scheduled six regular full council meetings for the period July 2021 to June 2022. The number of full council meetings held within this period were eighteen (18) with five being regular meetings and thirteen being special meetings.
 - ii) The University had scheduled two regular full council meetings for the period July 2022 to October 2022. The number of full council meetings held within this period were six with two being regular meetings and four being special meetings.
 - iii) Most Council meetings were held outside the principal or registered office. For example, fifteen (15) out of twenty-one (21) meetings held in the period between July 2021 and June 2022 took place at Nairobi Campus Boardroom.

A high number of unscheduled meetings is contrary to the advisory by the Head of Public Service and may lead to a failure to control Council expenses resulting in wastage of public resources.

The Vice Chancellor should ensure that the council complies with all requirements of the circular referenced OP/CAB.9/1A from Head of Public Service dated 11th March, 2020 on Management of State Corporations which provides among other requirements that;

- i) Board meetings are restricted to a minimum of four and capped at six meetings in a financial year.*
- ii) Approval for any extra board meetings above the maximum number specified should be justified as to the source of funds, and implications thereof, and reasons why the same cannot be adjudicated in regular meetings and approval sought from the Cabinet Secretary in consultation with SCAC*
- iii) All Board Meetings to be transacted in the Principal or Registered Office, and not Branch Offices. Board retreats to be approved by the Cabinet Secretary.*

Council Attendance Registers

8. The following issues were identified in management of council attendance registers;
 - i) All council meeting attendance registers were not closed after meetings.
 - ii) Some Council members do not sign the attendance register. For instance, a Special Meeting of Council held 15th February, 2021 one member did not sign the attendance register despite the name being listed and, in the Finance, Administration & Strategy Committee meeting held 27th January, 2021 two members did not sign the attendance register despite names being listed
 - iii) Some entries on the attendance register had cancellations where reasons for the cancellations were not provided. For example, attendance registers for council meetings held on 25th February, 2021 and 15th December, 2021, Audit, Risk and Compliance Committee meeting held on 5th March, 2021 had unexplained cancellations.

These are loopholes, which may compromise accountability on attendance of meetings and may lead to processing of irregular allowances and provide opportunities for doubting quorum and authenticity of meeting proceedings.

The Vice Chancellor should ensure that;

- i) All meeting attendees sign the attendance registers during meetings;*
- ii) Meeting attendance registers are closed on adjournment of meetings; and*
- iii) Alterations made on the meeting attendance registers be explained.*

Monitoring and Evaluation

9. After council resolutions were made, the secretariat sent action letters to respective offices for implementation. However, The Council secretariat had not developed an implementation and monitoring framework for Council resolutions. This made it difficult to establish the status or progress of implementation of council resolutions without involving the action offices.

This is a weakness, which may lead to complacency in implementation of Council resolutions and may hamper effective performance evaluation.

The Vice Chancellor should ensure that a monitoring and evaluation framework for tracking progress of implementation of Council resolutions is developed and implemented.

Complaint Management Mechanisms

10. The University has established a complaints management procedure to process complaints received through various service delivery points, whereby the complainant records the complaints in a complaint and complement register. The complaints and actions taken are reviewed by the complaints handling committee on quarterly basis. It was observed that complaints received electronically through the official email and social media accounts were forwarded to the VC for allocation to action officers. A register for such complaints was not maintained, making it difficult to follow up on action taken and feedback given to the complainant.

Failure to register complaints may provide opportunities for use of discretion in handling complaints, which may lead to bribery, extortion, delay in resolution of complaints and denial of services.

The Vice Chancellor should ensure that complaints received electronically are registered, processed through the Complaints Management Committee, investigated and action taken.

2.3 Financial Management

The Revised Statutes of Moi University, 2021, the Finance Department is now headed by the Chief finance officer. Initially the department was headed by the Deputy Vice Chancellor, Finance. The functions of the department are to maintain a comprehensive accounting system for the university that ensures that all revenues, expenditure, assets and liabilities of the University are properly accounted for. The department also prepares and submit annual University financial statements and reports. According to the new structure the Chief finance officer is deputized by two deputy chief finance officers in charge of Accounts and Finance respectively. The Accounts departments handles Expenditure and financial reporting while the Finance department has; budgetary control & vote book, Revenue, Risk management & investment sections. The following are the systemic weaknesses under financial management

Financial Management Policies

11. The University has Financial Regulations and Accounting Manual of 2007. Additionally, the University has ISO procedure for budget and budgetary control, student finance, revenue section, management of imprests and claims, cash office, payment of salaries, payment of creditors and bank reconciliations. The University Financial Regulations and Accounting Manual have not been reviewed to be in line with the Public Finance Management Act, the PFM (NG) Regulations and the revised university statutes.

These are loopholes that can lead to violations of the legal requirements leading to financial mismanagement.

The Vice Chancellor should ensure that the Finance Policy and Procedure Manual of the University is reviewed to be in line with the Constitution of Kenya 2010 Chapter 12 on Public financial management, Public Finance Management Act (2012) and the PFM (National Government) Regulations 2015. Finance Policy and Procedure Manual shall be a key reference guide for policies procedures and practices used in finance and accounting in the University and provide a standardized and official document for all university staff and officers on financial management and accounting. This will lead to accountability and transparency in financial management.

Public Finance Management Standing Committee

12. The PFM (National Government) Regulations 2015 requires that every national government entity establish Public Finance Management Standing Committee to provide strategic guidance to the entity on public finance management matters. The examination team noted that University has not established Public Finance Management Standing Committee.

This is a weakness that can lead to lack of prioritization on resources allocation and monitoring budget implementation; failure to manage risks and implement internal controls; and non-compliance with applicable laws, regulations, rules and guidelines.

The Vice Chancellor should ensure that the Public Finance Management Standing Committee is established to provide strategic guidance to the university on public finance management matters in accordance with Regulation 18 and 19 of the PFM (National Government) Regulations 2015.

Implementation of ERP Finance Module

13. The University started the implementation of ERP in the year 2019. At the time of Examination, the ERP finance module had not been fully implemented. The Student

Finance and Accounts Payables were 80% complete, while the Accounts Receivables and Final Accounts were 70% and 50% complete respectively. The Internal Audit report on the Annual and Financial Statement for the financial year ended 30th June 2022 indicated challenges experienced by the University in implementing the ERP finance module. Some of the issues are:

- i) The module accepting entries to be made after the closure of the financial year;
- ii) System allows the students to invoice themselves leading to mis posting of the ledger; and
- iii) System error duplicating entries of petty cash in the general ledger. This was reported by the Acting Chief Finance officer to the Director ICT vide a Memo dated 7th September 2022.

Failure to fully implement ERP finance module is a loophole that that may lead to lack of accountability and incomplete financial records. Further duplication of entries and unauthorized access can lead to incorrect and manipulated balances

The Vice chancellor should ensure that the ERP finance module:

- i) is fully implemented and configured to eliminate unauthorized access and system errors;*
- ii) access is controlled and that roles are segregated to guard against breaches of information, confidentiality, data integrity and loss of business continuity to comply with Rule 110 of the PFM (NG) Regulations, 2015; and*
- iii) is regularly audited to identify any risks and to seal any loopholes that may be used to perpetrate fraudulent activities.*

Revenue Collection System

14. The University allows for revenue collection through direct bank deposits, six M-pesa pay-bill accounts and at times cash collected at the income generating units. The examination team noted the following in regard to revenue collections;

- i) The payments through Mpesa Pay-bills is not integrated with ERP and thus there is no real time cash receipting. This may lead to shortfalls and difficulty in reconciliations.
- ii) At times the university accept the minimal cash collections at the income generating units which is receipted and banked through the cash office. These are loopholes that may lead to under banking, direct spending and misappropriation of the cash collected.
- iii) The receipts used for cash collections have no security features. This may lead to illegal duplication of receipt books resulting to loss of revenue.

The Vice Chancellor should ensure that:

- i) The Mpesa receipts are integrated with the ERP system for real time receipting and reconciliations;*
- ii) Only cashless receipts are accepted by the university to avoid revenue loss; and*
- iii) In the circumstances where receipts are issued, they have security vetted features to avert any loss.*

Income Generating Units

15. The University through the revised statutes has established the Directorate of Resource Mobilization, Enterprise Development and Institutional Advancement (RMEDIA). Its mandate is to mobilize resources for the University through income generating units among other sources save for the academic activities. The directorate had received various business plan proposals awaiting presentation to the Committee of Council on Finance, Administration and Strategy for consideration and approval with a view of securing funds for implementation. The examination team noted the following weaknesses in regard to income generating units:

- i) Most of the University's income generating units were making losses. For instance, the university's draft financial statements for the FY 2021/2022 reported losses from Elimu Milling Kshs (175,000), Farm Revenue Account Kshs (5,024,000), MU Technologies kshs (15,142,000) and Rivatex Trading Account Kshs (234,202,000); and
- ii) The university provides subsidized meal prices to the students. The meal prices had not been adjusted since 2012 to incorporate changes in food market prices over time despite requests for adjustment from the catering units. This had led to the catering unit's failure to break even.

These losses indicate financial imprudence and inefficiencies that leads to the loss of public funds.

The Vice Chancellor should ensure that income generating units are efficiently managed by enhancing internal controls, professional management practices and reviewing pricing to commensurate with the market trends.

Student Fee Debtors

16. The Audit, Risk and Compliance Committee meeting held on Thursday 17th and Friday 18th February 2022 minute 133/02/22 reported student fee debtors of ksh 3 billion as at 31st March 2018 of which 1.9 billion was said to be bad/doubtful debts. As at May 2019 fees debtors amounted to Ksh 1,789,736,867 classified as Recoverable Ksh

867,948,137, Doubtful Kshs 909,737,548 and Bad debts Kshs 16,051,183. As at 30th June 2021, after the debtors clean up and reconciliation during the migration to ERP, the student fee debtors stood at Kshs 801,444,446.55

The inconsistency of the students' fee debtors was attributed to some students having two or more accounts resulting to duplication and misposting of invoices. The doubtful and bad debts were owed by students who have cleared their studies.

Failure to maintain accurate record of students' fee debtors is a loophole that can lead to:

- i) Students with fees balances graduating, indicating possible collusion between staff and students during clearance, making it difficult to recover the students fee debts;
- ii) Lack of a follow up mechanisms leading to accumulation and non-recovery of debts;
- iii) Manipulation of data and reliance on unverifiable data resulting to loss of revenue;
- iv) Loss of University funds and shortfalls in budgeting.

The Vice Chancellor should ensure that:

- i) The University develop and implement strategies for collection of outstanding students' fee debts. This can be done by enforcing the University fees payments rules and engaging a debt collection agency to be paid commission based on the amount collected;*
- ii) Accurate students' fee debtors record is maintained. Any alterations on such records should be in adherence to Rule 102. (3) PFM (National Government) Regulations, 2015 which require the Accounting Officer to satisfy himself or herself that where an alteration of a financial record requires the authorization, approval and, or deletion of any transaction or data whether electronic or manual by any means other than in writing, that there is sufficient audit trail which shall identify the person who approved the transaction; and*
- iii) PFM Act 2012 section 69 and Rule 157 PFM (National Government) Regulations, 2015 is adhered to on writing off of losses when reasonable steps have been taken to recover the losses and the loss is irrecoverable.*

ERP Budgetary Module

17. The implementation of the ERP budgetary module had challenges leading to weaknesses in management of budget utilization. The following weaknesses were

noted by the budgetary control and vote book section for the attention of ICT department;

- i) There was no real time vote book balances after commitment and payment leading to over commitment;
- ii) The budgetary allocations are not displayed in some votes leading to overdrawn votes;
- iii) The module allows overdrawing the votes thus there is no budgetary control measures;
- iv) Budgetary details of the vote head are not displayed leading to wrong vote head charge; and
- v) Non-budgetary provision for transactions such as kitchen sales and expenses and therefore they end up being charged on wrong votes.

Failure to integrate the budgetary control measures in the ERP budgetary module may leads to the university expending above the approved budgets on various votes without the approval of the University Council. These are loopholes for misappropriation of public funds, pending bills and non-implementation of the prioritized projects and programmes.

The Vice Chancellor should ensure that:

- i) ERP budgetary module is configured to provide adequate budgetary control measures;*
- ii) The expenditure is contained within allocations in the approved budget; and*
- iii) Supplementary budgetary estimates is prepared and approved by the University Council when the allocated funds are not adequate for the intended purposes as stipulated in Regulation 40 of the PFM (National Government) Regulation, 2015.*

2.3.1 Imprest Management

18. The University operates an imprest system where cash advance or float is issued to officers who in the course of their duties are required to make payments which cannot conveniently be made through the cash office or bank account. The University operates two types of imprests, namely: Temporary (safari) imprest and Standing Imprest. The following were noted in regard to imprest management;

Standing Imprest

19. The University vide a memo dated 12th July 2022 issued a petty cash float for FY 2022/2023 showing amounts allocated to various departments in the university. The

facility is issued for amounts ranging from Kshs 1500 to Kshs 300,000. The following was noted in the management of Petty cash;

- i) The Petty cash is at times used to procure items which should be procured through the normal procurement processes. The standing imprest is used to pay for items above the thresholds allowable in the procurement regulations. Some Departments use the imprest for purchase of farm inputs, fuel and stationery. Failure to streamline imprest management process creates loopholes for making of irregular and fraudulent payments, leading to loss of funds.
- ii) The Petty cash holders do not maintain memorandum cashbooks for the standing imprests. The examination team noted that only the cash office maintained Petty cash book. Failure to maintain memorandum cash book may make it difficult to provide accountability on the usage of imprest.
- iii) The imprest holders do not have safes or cash boxes where the imprest advanced can be kept. Lack of cashboxes or safes for storage of petty cash may lead to loss of cash through theft.
- iv) The Head of Accounts was not conducting regular and frequent spots checks to monitor usage of the standing imprests. This is weakness that may lead to non-accountability and misuse of the imprest facility.

The Vice Chancellor should ensure that;

- i) The university complies with the provisions of Section 93(2) of the PFM (National Government) Regulation, 2015 which requires that an imprest is issued for a specific purpose, and any payments made from it, shall be only for the purposes specified in the imprest warrant.*
- ii) The university complies with the provisions of Section 93(14) of the PFM (National Government) Regulation, 2015 which requires the holder of a standing imprest to keep a memorandum cash book to record all receipts and payments and the balance at hand which should agree with the cash balance recorded in the memorandum cash book, and in the absence of any receipts, the actual cash balances and the expenses paid should always balance.*
- iii) The university provide imprest holders with safes or cash boxes for storage of the standing imprests in accordance to the provisions of Section 91(3) of the PFM (National Government) Regulation, 2015. The provision states that "Funds disbursed for imprest shall not be kept or held in an official bank account, but in a separate or personal bank account operated by the imprest holder or in the form of cash under safe."*
- iv) The University complies with Regulation 93(17) of the PFM (National Government) Regulations, 2015 which requires the head of accounts division*

to ensures that frequent spot checks are made on the standing imprests by a responsible officer to count the cash on hand and confirm that the actual cash on hand corresponds with the balance recorded in the memorandum cash book and any anomalies are reported.

Un-Surrendered Imprests

20. At the time of review, the University had outstanding (un-surrendered) imprests amounting to Ksh. 69,281,740.55, as shown in Appendix II. The examination team noted that some imprests issued are not accounted for and surrendered within seven (7) days after returning to duty station and no interest is charged. The analysis of the outstanding imprests was as follows;

Financial Year	Amounts Ksh.
2000/2001	42,000
2020/2021	797,800
2021/2022	18,422,004
2022/2023	49,937,069

Failure to account for and surrender imprest is a violation of the Public Finance Management Act, 2012 and creates a loophole for misappropriation and loss of public funds.

The Vice Chancellor should ensure that:

- i) Imprests are accounted for and surrendered by staff within seven (7) working days after returning to their duty station in line with Rule No. 93(5) of the PFM (National Government) Regulations, 2015.*
- ii) Outstanding imprests are recovered from staff in line with Rule No. 93(6) of the PFM (National government) Regulations, 2015 which requires that in the event of the imprest holder failing to account for surrender of the imprest on the due date, the Accounting officer shall take immediate action to recover the full amount from salary of the defaulting officer with an interest at the prevailing Central Bank rate.*

Imprest for Group

21. The University has a practice of issuing one officer with imprests for a group of officers involved in a particular project or activity. For instance, the following imprests were issued to an officer on behalf of other;

Personal No	Imprest No	Date issued	Amount	Purpose
5955	27556	09-09-2021	3,459,092	Facilitation of council retreat
2981	1013	03-06-2022	99,000	Facilitation to inspection and acceptance committee to Nrb
5978	42584	28-03-2022	232,500	Facilitation for practical attachment

Issuance of imprest to a staff on behalf of other employees is contrary to PFM Regulation (National Government), 2015. This may lead to inadequate accountability and unnecessary accumulation of un-surrendered imprests. It may also lead to circumventing the law, by allowing officers with outstanding imprests to obtain new imprests.

The Vice Chancellor should ensure that officers apply and account for their imprest advances individually and surrender appropriately within the stipulated period in accordance to the provisions of Section 93 (4) of the PFM Regulation (National Government), 2015.

Multiple Imprests

22. The University at times issue staff with more than two imprest before surrendering previous ones. The table below is a sample of officers holding multiple imprests.

Personal No	Date issued	Imprest No.	Amount	Purpose
2780	9/15/2021	IMP22-00196	1,684,689.00	Research
	8/31/2022	IMP22-00196	1,684,689.00	Research
4740	9/28/2021	IMP21-00460	183,420.00	Attend short courses
	10/13/2022	IMP22-00456	52,750.00	Attend crest alumni networking

This practice is a contravention of the PFM regulations and is a risk that may lead to loss of university funds.

The Vice Chancellor officer should ensure that;

- i) no imprests are issued to officers with outstanding imprest in accordance with Rule No. 93(8) of the PFM (National Government) Regulations, 2015 which require that no second imprest should be issued to any officer before the first imprest is surrendered or recovered in full from his or her salary;*
- ii) before issuing temporary imprests the hospital should ensure that the applicant has no outstanding imprests;*
- iii) the University should use automated systems that are configured to reject applications form officers with un-surrendered imprests.*

Accounting for Imprest

23. The University use Accounting for Imprest Form for surrendering imprests. The examination team noted the following weaknesses in regard to the use of the Accounting for Imprest Form:

- i) The use of the Accounting for Imprest Form for surrendering imprest instead of the Surrender Voucher lacks legitimacy of being an accountable/ payment record.
- ii) The Accounting for Imprest Form is manually given a number after processing the surrender of imprest.
- iii) Further some Accounting for Imprest Forms used for surrender of imprest are not attached with a copy of the imprest application form/ warrants. For instance, Accounting for Imprest Form Number SUR 21-001022 for Ksh 99,000 only internal memos are attached. These may lead to incomplete surrender of issued imprest leading to loss of public funds.

The Vice Chancellor should ensure that the surrender of imprest use Surrender Voucher to conform with PFM (NG) Regulation 104 (1) which require that all receipts and payments vouchers of public moneys are properly supported by pre-numbered receipt and payment vouchers and supported by the appropriate authority and documentation.

Debt Management

24. The reports of the Office of the Auditor General have expressed concern that the University is not a going concern due the fact that University has more Liabilities than its Assets. At the time of examination, the University had a total debt amounting to Ksh 6,168,494,570 consisting of:

Category	Amount in Ksh.
Payroll and Related dues and Casual wages	4,578,467,983
Contractors for Projects	55,824,184
General Service Providers	1,357,193,197
Student Holding Accounts	95,174,053
Borrowing	81,835,152
Total	6,168,494,570

The Examination team noted that; -

- i) The University did not have a Creditor's payment policy to regulate the payment accounting cycle for the procured works, goods and services. This creates a loophole for extortion from suppliers where payments can be done on a discretionary basis without following a first come first serve principle.

- ii) The University had not prepared a Creditors Management Plan to guide on settlement of outstanding creditors. This can lead to court litigations and courts orders on repayment of debts which have not been budgeted and planned for.

Lack of a creditors' payment policy and creditors' management plan may lead to favoritism in payment and collusion on the prioritization of payment of creditors. Further it may lead to disputed creditors and inaccurate pending bills.

The Vice Chancellor should ensure that:

- i) Creditor's payment policy is developed and implemented to provide for payment of creditors. Some of the issues that the policy may address include processing and approval of invoices, payment period, and payment method, frequency of payment and responsibilities of each party.*
- ii) The Creditors Management Plan is prepared to guide the University on management and settlement of outstanding creditors. This will help the university to reduce ambiguity on the payment to creditors, reducing the risks for pending bills, maintaining the credit worthiness reputation from the suppliers and managing cash flows.*

Claim for Part Time Lecturers

25. The Audit, Risk and Compliance Committee meeting held on Thursday 17th and Friday 18th February 2022 minute 133/02/22 reported that Part- time lecturers' claim was ksh 823,137,219 as at 11th October 2017. The claim was validated to a payable claim of ksh 270,067,126 in May 2019. The Committee had recommended that a memo be issued to part time lecturers to submit the relevant documents supporting the claim by 30th September 2021 failure to which they forfeit any claim against the University. The validated claims as at 31st July 2021 was kshs 274,216,261.75. The committee had noted that;

- i) There was duplication of claims for the same courses by the part-time Lecturers
- ii) The claims also included the paid claims resulting to over statement.

At the time of examination, the claim of part time lectures was Ksh 269,882,965 which has not been paid as shown in Appendix III. The information available indicated that details of the claimants for Ksh 83,852,482.96 was provided while as there were no details for a claim of Ksh 186,030,482.75. Failure to provide specific details of the claimants and the record of the work done may lead to payment of fraudulent claims resulting to loss of public funds.

The Vice Chancellor should ensure that the claim for part time lectures is scrutinized and verified to confirm the authenticity before payments are made. Further, the record of the details of the work done should be provided.

Students Creditors

26. The university owes the current and former students caution money held in students holding account. The draft financial statements for the FY 2021/2022 indicate that the Student Holding Account had a balance of Ksh 91,390,000. The examination team was informed that up to the year 2016, the former students were refunded the caution money through imprests advanced to staff, which was not fully accounted for. The university had not developed policy to guide the management of these funds. These has led to the accumulation of the monies in the university account.

These are loopholes that may lead to loss of students' money, misappropriation and diversion to other use.

The Vice Chancellor should ensure that the university develops a policy for management of caution money and puts mechanism in place for the refund of caution monies to the former students.

Court Consent to Pay Debts

27. The creditors aggrieved over non-payment for goods, services and works rendered have sued the University to enforce payment. In such circumstances, the University enters into court consent to make payment to the creditor. However, at times the university does not honour the payment agreement leading to further litigation which result to interest charges and additional legal costs. For example, in court cases Eldoret CMCC No. 681 of 2006 and Eldoret CMSCC No. E047 of 2022 the University had failed to honour the agreement.

Failure to honour court consents and signed agreements with creditors is a loophole for escalation of costs leading to loss of public funds.

The Vice Chancellor should ensure that commitment made by the University through various court consents and signed agreements with creditors are honoured and settled to avert loss of public funds.

Idle Bank Accounts

28. At the time of examination, the University had 26 bank accounts and 3 Mpesa paybill accounts which were not active as shown in Appendix IV. This is due to closure of

some programmes or the accounts are used for minimal or no activities at all. Having these accounts is a risk that can lead to;

- i) Use of the accounts for fraudulent and illegal activities;
- ii) Continuous charge of ledger fees to maintain the account which is loss to the university;
- iii) Incurring the tax burden of the costs and outcomes of unauthorized transaction; and
- iv) Losing monetary value for any balances in the accounts which are not properly invested and earning any interest since the accounts are transactional in nature.

The Vice Chancellor should ensure that idle bank accounts are closed in line with the PFM Act section 28 which require the National Treasury to authorize the opening, operating and closing of bank accounts and sub accounts for all national government entities in accordance with regulations

2.3.2 Fixed Assets Management

Policy and Guidelines on Asset and Liability Management

29. The National Treasury and Planning issued the Policy on asset and liability management in the public sector in June, 2020 and the Guidelines on asset and liability management in the public sector in March 2020. The University has not implemented the policy and guidelines on assets management. For instance, the university has not undertaken the following;

- i) Established, maintained and documented adequate asset management structures, including an Asset and Liability Management Unit and a Standing Committee on Assets and Liabilities Management
- ii) Utilized ICT-based information systems for the purposes of managing Assets and Liabilities
- iii) Prepared Assets and Liabilities registers based on the issued templates.

Failure to implement the policy and guidelines on asset and liability management is a loophole for mismanagement, theft, insecurity and misreporting of public assets by the University.

The Vice Chancellor should ensure that the Policy on asset and liability management in the public sector and the Guidelines on asset and liability management in the public sector issued by National Treasury and Planning is implemented.

Assets Register

30. The examination team noted that the University maintained an asset register in excel spreadsheet. The asset management has not been automated. The excel spreadsheet provide fixed asset posting date, document number, depreciation book code, asset number, description and acquisition cost. However other details of the register such as the source of funds, serial number, make/ model, payment voucher number and location are not recorded. Further the University assets are tagged but cannot not be tracked by location and the movement of assets is not recorded.

Lack of a comprehensive assets register is a weakness that can lead to mismanagement, pilferage and loss of public assets

The Vice Chancellor should ensure that University assets are managed in accordance with Rule 139 and 143(1) of the PFM (National Government) Regulations 2015 which require that;

- i) Proper control systems exist for assets and that preventative mechanisms are in place to eliminate theft, security threats, losses, wastage and misuse;*
- ii) Movement and conditions of assets can be tracked*
- iii) Processes and procedures both electronic and manual are in place for the effective, efficient, economical and transparent use of the government entity's assets.*
- iv) Comprehensive asset registers is put in place with adequate information as per the templates provided by the National Treasury in 2020*

Ownership of the Assets

31. The examination team was provided with a list and copies of land ownership documents for parcels of land owned by the University which were under custody. At the time of examination, the following was noted;
- i) The University's Main Campus land title number LR 12582 IR No 4007 was registered in 1989 under the East Africa Tanning Extract Company. The land had not been transferred to Moi University.
 - ii) The University's Nairobi Campus land title number LR 209/10277 IR No 39377 is registered under Thabiti Finance Company Limited. The land had not been transferred to Moi University.
 - iii) The University's PDN-CHS land title number Eldoret Municipality Block 8/20 with a size of 3.03 acres is a leasehold land for 99 years from 01/03/1910 to 08/02/2009. The leasehold ended in 2009 and the status of the renewal of lease was not availed.

- iv) The copies of titles provided included title number South Teso / Angoromo /8484 parcel of land for Alupe University. This is an indication that a transfer has not been done.

Failure to transfer legal ownership to the university is a risk that can lead to encroachment, illegal allocation and dispossession of public land.

The Vice Chancellor should ensure that;

- i) University parcels of land are transferred and registered in the name of the university.*
- ii) The expired leasehold land owned by the university is renewed*
- iii) The parcel of land for Alupe University in possession of the University is handed over and transferred to Alupe University.*

Maintenance of Assets

- 32. The University has an Aircraft registration number CESSNA 182RG which was used by the school of Aviation. The University had a service contract agreement with Pro Aviation Ltd and the aircraft was taken to the Company for maintenance. However, the company failed to maintain it and on 2nd October 2018 the court gave orders compelling the company to;
 - i) Re-assemble the aircraft to its original state in the condition in which it was as at 16th March 2018
 - ii) To obtain airworthiness certificate from Kenya Civil Aviation Authority
 - iii) Release and hand over the aircraft to the university

Pro Aviation Ltd ignored the court orders consequently the aircraft was still parked at Wilson Airport airside on the bush grass and attracting daily parking charged to the University.

Failure to enforce the court order has led to further deterioration of the aircraft and accumulation of storage charges. These are loopholes for loss of university asset and public funds.

The Vice Chancellor should ensure adherence to the requirement of Rule 139 of the PFM (National Government) Regulations 2015 on management of assets to prevent loss, wastage and misuse.

2.3.3 Audit and Risk Management

33. The University has an Internal Audit unit, which review and evaluate budgetary performance, financial management, transparency and accountability mechanisms and processes in the University. It also gives reasonable assurance through the audit risk and compliance committee on the state of risk management, control and governance within the university. The Unit reviews the effectiveness of the financial and non-financial performance management systems of the University.

The Internal Audit Unit reports administratively to the Vice Chancellor and functionally to the Audit Risk and compliance Committee. At time of examination, the following weaknesses were identified:

Risk based audit assessment strategic plan

34. The University under Minute No. 156/10/22 of the special meeting of the Audit, Risk and Compliance committee held on Wednesday 19th October, 2022 approved annual audit work plan for 2022/2023 financial year. The examination team noted that the University has not developed a three-year Internal Audit strategic plan to guide the university on risk-based audit assessment.

Therefore, the approved annual audit plan for FY 2022/2023 is not prepared on the basis of risk assessments to be set out in a three-year strategic plan to support risk-based auditing as required by law.

These are weaknesses which make it difficult to identify and prioritize areas prone to risks, and developing appropriate mitigation strategies to address systemic weaknesses and seal corruption loopholes.

The Vice Chancellor and the Chairperson of the Audit Risk and Compliance Committee should adhere to Regulation 170 (1) of the PFM (National Government) Regulations, 2015, which states that "Internal audit planning shall be carried out on the basis of risk assessment and shall be set out in a three-year strategic plan, on the basis of which an annual internal audit unit plan shall be developed."

Implementation of Audit Recommendations

35. The Internal Audit reports are tabled before the Audit, Risk and Compliance Committee and copied to the Vice Chancellor. The examination team noted that there was slow response on the audit issues raised from the departments. Minute 133/02/22 of the 51st meeting of the Audit Risk and compliance committee held on Thursday 17th and Friday 18th February 2022 raised concern on laxity on implementing and / or resolving the audit issues by management and recommended for disciplinary action

against culpable officers. For instance, the audit recommendation on the following areas have not been addressed;

- i) Privatization of Nairobi campus car park
- ii) Construction of the main gate
- iii) GOK Loan
- iv) Audit of farm issues
- v) Biometric system for students' smart cards
- vi) Vandalism of the drip irrigation equipment, green house and the fence erected on the farm
- vii) Recovery of allowances received by staff from multiple sources among other audit recommendations

Further, action plans for implementation of the recommendations contained in the internal audit reports were not prepared.

Failure to implement the recommendations of the Internal Audit Unit is a loophole for continued perpetration of malpractices at the University.

The Vice Chancellor and the Chairperson of the Audit Risk and Compliance Committee should adhere to Regulation 172 of the PFM (National Government) Regulations, 2015, which states that "(1) The accounting officer of the concerned entity shall be responsible for the implementation of the recommendations made in the audit reports and shall develop response and action plan which he or she shall submit to the Chairperson of the audit committee within fourteen days. (2) The response and action plan submitted to chairperson of the audit in paragraph (1) of this regulation shall be submitted to the Audit Committee for follow up to ensure their implementation".

2.4 Supply Chain Management

Method of Procurement

36. The procurement plan for 2020/2021, the University had indicated Request for Quotation method for items whose amount was beyond the applicable threshold. This is an irregularity which limits competition and may compromise the tendering process in the University resulting to loss of public funds

The Vice Chancellor should ensure that the thresholds for determining procurement methods is adhered to in accordance with schedule II of the PPAD Regulations, 2020.

Interference in the Tendering Process

37. The examination team noted that there are circumstances where the tendering process in the university was interfered with. For instance, the investigation report by the Security Department dated 22nd March, 2021 indicated an alleged interference of the tendering process for Tender Number MU/T/26/2019-2020 on the leasing of university facilities. It was reported that a person engaged by the University as a volunteer in the procurement unit contacted an unsuccessful bidder to provide additional documents after the tender was closed.

Interference with a tendering process is a loophole for collusion to award unqualified tenders and provides an opportunity for bribery and extortion. Where this goes unabated, it may result in procurement of substandard goods, works or services denying the university value for money.

The Vice Chancellor should ensure that Section 30 (d) of the Public Procurement and Asset Disposal Regulations, 2020 is adhered to which prohibits direct communication with any of the tenderers participating in a tender. Further the University should activate the ERP procurement module to enhance accountability and transparency in the procurement process.

Selection of Bidders

38. The PPAD 2015 and Public Procurement and Asset Disposal Regulations require fair and equitable rotation amongst the pre-qualified persons. The team noted that the University had engaged one consultant for different projects which included; construction of Amphitheatre building at the Main Campus, proposed refurbishment of the Moi University Technologies Digital Assembly at Rivatex Facility in Eldoret and construction of the main gate at the Main Campus.

Failure for a fair and equitable rotation amongst the pre-qualified persons is a loophole for collusion, bribery and lack of value for money.

The Vice Chancellor should ensure adherence to Rule 91 (5) of Public Procurement and Asset Disposal Regulations, 2020 which provide that 'an accounting officer shall ensure a fair and equitable rotation amongst the registered suppliers.

Requirements for Award of Tender

39. The Public Procurement and Disposal Act, 2015 and its Regulations (2020) provides requirements for processing and award of tenders in a public entity. The examination team noted that at times, the requirements for award of tender were not followed.

For instance, in the award of the tender for Provision of Renewable Energy Laboratory Tender number MUT/3/2019-2020, the bidder had not provided a bid security, financial parameters were not considered during evaluation, market survey was not done and the professional opinion did not form part of the proceedings.

These are loopholes for collusion, skewed decision-making, possible litigation and lack of value for money for the university.

The Vice Chancellor should ensure adherence to Public Procurement and Asset Disposal Act, 2015 section 84 (1) which states that "The head of procurement function of a procuring entity shall, alongside the report to the evaluation committee as secretariat comments, review the tender evaluation report and provide a signed professional opinion to the accounting officer on the procurement or asset disposal proceedings"

Variation of Contracts

40. The University at times did not follow the procedures for variation of contracts. For instance, variation of contract for the provision of Insurance services vide Tender Number MU/T/1/2019-2022 the following were noted
- i) Initially a proposal to vary the contract for four months and thereafter an approval was granted for one year at a premium cost of 51,721,745.00
 - ii) The justification provided for extension of the insurance contract was that the insurance industry was very volatile and underwriters put a big mark up of 18% due to COVID 19.
 - iii) The variation of contract was not processed by the evaluation committee as provided in Section 139, 2(a) of PPAD Act, 2015.

Irregular variation of projects cost create opportunities for soliciting kickbacks and extortion. These are weaknesses that may lead to loss of funds through collusion.

The Vice Chancellor should ensure that contract variations are processed through the evaluation committee, are duly justified and where the variations result in an increment of the contract price by more than 25%, such variations should be tendered for separately. The staff to be sensitized on PPAD Act 2015 on cost Variation.

Management of Suppliers

41. The university is not in good standing with some of its suppliers due to poor credit worthiness and reputation. This has led to:

- i) The University to make cash purchases through proforma invoices and issuance of imprest for payment for goods, works and services. For instance, the Local Purchase Order No 012182 issued to Nevas Vet-Agro Suppliers limited to supply veterinary drugs was declined by the supplier. An officer applied for imprest vide warrant No. IMP22-0044 of Ksh 44,150 to purchase the veterinary drugs. This practice is contrary to the PFM Regulations
- ii) Non-delivery of supplies to the University. For example, the ordered examination booklets were not delivered due to unsettled payments by the University. This was indicated in a memo ref. MU/ADM/S&S /CSO/5/269 dated 18th May 2022. This is a weakness for delay of services
- iii) Out of stock items of foodstuffs and other basic materials occasioned by failure to pay suppliers who subsequently declined to supply the items as indicated in a memo Ref: MU/CS/TC/ADMIN/12/112 dated 14th October 2019 from the catering officer to the DVC (A, P & D). This made it difficult to sustain food provision for the students. This may lead to poor service delivery and possible student unrest.

The Vice Chancellor should ensure that effective credit management procedures are established and sustained. Further advance payment to suppliers of services and goods be discouraged unless its provided for in the contractual terms and conditions contained in a valid contract signed between the university and the supplier

Contract Management

42. The University had leased facilities for accommodation of students at various campuses. The University closed some of the campuses and there was a delay in terminating the contracts for the leased facilities, vacating the buildings and handing over the premises. This led to the accrued rent arrears. For instance, letter dated 24th January, 2018 to the VC from MIVCO hostels claimed rent in arrears amounting to Kshs. 2, 257, 00.00 and threatened legal action if the claim was not settled within 7 days. A follow up claim letter was done dated 13th July, 2018 indicating that the arrears had escalated to 3,045,000.00. Further, an internal memo ref: MU/OAC/ADM/84 dated 22nd November, 2018 indicated that valuation and handing over of 2 hostels had not been undertaken since 4th September, 2018 and warned that failure to act would increase the rent arrears by Kshs. 578, 280 each subsequent month.

Delay to terminate contracts, vacate and handing over the premises is a weakness that indicates complacency and conflict of interest and a loophole for loss of public funds.

The Vice Chancellor should ensure prudent contract management to avert losses and litigations.

Stores Management

43. The University has various stores for storage of various items. The examination team noted the following weaknesses in stores management;

- i) Records maintained for stores management were not updated. For example, at the Central stores, Bin cards balances for various items did not tally the physical count of those items. The bin card for photocopying paper recorded a balance of 863 reams while the physical count was 250 reams. Similarly, the bin card for Toner 78A recorded a balance of 15 tonners while the physical count was 11 tonners. Failure to maintain accurate record of stores is a loophole for theft, pilferage and loss of public funds.
- ii) Expired items and items earmarked for disposal were mixed with useable stores. For instance, old tyres earmarked for disposal were mixed with usable computers and printers. Similarly, furniture for disposal were stored amongst usable cables. Failure to separate stores for usable and disposable items can lead to; deteriorating of value of usable items, usable items being prone to damage and theft.
- iii) The University does not maintain reorder levels. For instance, in the kitchen stores, the tea leaves had a quantity of 580 half-kilogram packets but items such as rice and maize flour were out of stock. This is a weakness that can lead to overstocking and understocking resulting to wastage and loss of public resources.



Store items mixed with disposable items at the Central stores.

Source: Examination Team

The Vice Chancellor should ensure that:

- i) *Accurate stores records are maintained to guarantee transparency and accountability in line with Section 160(1) of the PPAD Act, 2015 which requires the*

Accounting Officer to manage its inventory, assets and stores for purposes of preventing wastage and loss and continuing utilization of the supplies;

ii) Provide adequate space for systematic arrangement and labeling of stores; and

iii) Establish and maintain optimum stock re-order levels for consistent supply of required items to avoid over and under stocking.

Disposal of Assets

44. The University conducted a disposal exercise for boarded assets for the 2021/22 financial years using the sale by public auction method. Review of disposal proceedings for diverse University assets revealed that;

i) Disposal proceedings did not include a public advertisement of the intent to dispose as per Section 96 of the Public Procurement and Disposal Act;

ii) Technical valuers' report was not used to provide reserve values for different categories of items. The reserve prices were set by the members of the disposal committee as indicated in the minutes of the committee meeting held on 9th February 2022 and 23rd May 2022;

iii) Motor vehicle inspection reports from mechanical section of public works department to justify the unserviceability of the motor vehicles due for disposal was not done. For example, UD Bus KYF 115 and Toyota double cabin KAJ 930 had no inspection reports;

iv) Delayed disposal led to death of cow bearing tag no. 1004 due to old age. This was indicated in Disposal Committee minutes of 9th February, 2022; and

v) The University identified an auctioneer for the disposal process by extension of previous contract without employing a competitive process.

vi) These malpractices could lead to unfair disposal process to a few individuals, loss of revenue to the University due to reserve prices being less than market value of the disposed items and sale of serviceable items.

The Vice Chancellor should ensure adherence to;

i) Section 185. (1) of PPAD Regulations, 2020 which provides that 'a public tender notice shall be advertised in accordance with section 96 of the PPAD Act, 2015;

ii) Section 180. (1) of PPAD Regulations, 2020 which provides that 'an accounting officer shall be primarily responsible for ensuring that the procuring entity fulfils its asset disposal obligations';

iii) Section 164 (3) of the PPAD Act, 2015 on disposal procedures which provides that 'There shall be a technical report where appropriate by a relevant expert of the subject items for disposal that takes into account the real market price

and in so doing, the technical expert shall set up the price which shall be the minimum acceptable price below real market value of the boarded items'; and iv) Section 187 (1) of the regulations which requires the accounting officer of a procuring entity to ensure procurement of the services of a registered auctioneer through a competitive process in accordance with part X of the Act on Sale by public auction.

Project Management

45. The University was managing some projects. The following was noted;
- i) The University did not maintain retention accounts for projects. Retention funds were maintained in the main projects' accounts. Failure to maintain retention account for each project indicates failure to secure the retention money and leaves the University without a recourse in case of defects arising in projects before the defect liability has lapsed.
 - ii) There were delays in implementation of projects. For example; construction of Amphitheatre, contract sum 395,000,000 started in September 2021 and was to take 1095 days. During the Examination in November 2022, the project was required to be 33% complete, however the construction works were at 15%.

The University initiated new projects concurrently while prior projects stood incomplete. For example, started the construction of the main gate in May 2022 at a cost of kshs. 26,000,000, while construction of block C Block 3 of 2250 students' hostels was 80% complete, Capacity lecture hall at school of law annex campus was 80% complete.

Lack of prioritization of projects and delayed completion of projects is a weakness that necessitates unjustifiable variation costs consequentially increasing project costs, delaying benefits and lack of value for money

The Vice Chancellor should ensure that;

- i) Retention accounts are maintained for each project.*
- ii) Projects are prioritized for completion before commencement of others.*
- iii) There is clear definitions of project timelines in all projects/contracts and strict adherence of project implementation timelines*
- iv) Project management and supervision is enhanced to avoid ensure project tasks are on course and completed within reasonable time.*

2.5 Human Resource Management

Structure of the Human Resource Function

46. The Human Resource function is undertaken by two departments which are; -Human Resource department and Recruitment and Training department. The examination team noted there were some cases of duplication and overlaps of roles by the two departments in the management of leave, contract and supervision of staff.

These are weaknesses that may create confusion, inconsistencies and disparities in the management of human resources.

The Vice Chancellor should ensure that the Human Resource function is properly structured and staffed to facilitate synergy and harmony in execution of services to the staff, stakeholders and public.

Staff Establishment

47. The University's Staff Establishment was approved by SCAC in 2016. However, the following changes have taken place affecting the structure of the University:
- i) Revised statutes in 2021 which reorganized the University's governance structure; and
 - ii) Rationalization and harmonization of teaching staff, courses/ units and departments. This resulted to the disbandment of one school, merger of several departments within Schools, rationalization and realignment of academic staff.

The examination team noted that the University was undertaking recruitment before revising the existing staff establishment to incorporate the above changes.

Failure to revise the staff establishment is a loophole that creates opportunity for discretion leading to over or under staffing.

The University Council and the Vice Chancellor should expedite the process of review and approval of the Staff Establishment.

Contracted Staff Arrears

48. The University carried out a decasualization exercise and issued 6 months contract to 791 staff. These staff were working in areas of finance, ICT, Library, central services, catering, hostels, stores, farm, security and safety. At the time of the examination the contracted staff had not been paid for four months, that is July, August, September

and October 2022. The contracted staff were owed Ksh. 48,136,404.98 as shown in Appendix V.

Failure to pay contracted staff for a prolonged period while entrusting them with university assets is a weakness that may lead to pecuniary embarrassment of staff resulting to embezzlement, misappropriation of funds and theft of university property to meet their financial obligations.

The VC should ensure timely payments of all staff engaged by the University.

Training

49. Staff training and development is crucial to equip staff with relevant knowledge and skills to enable them perform their duties effectively. The examination team noted the following with regards to training and development;
- i) There was no training committee in place for co-ordination and allocation of trainings.
 - ii) Training needs assessment for staff was not being undertaken to guide in the identification of skill gaps.
 - iii) The University had not developed annual training plans.

These are weaknesses that can lead to haphazard trainings, favouritism in allocation of trainings and lack of expertise in execution of duties and poor services delivery.

The Vice Chancellor should adhere to Section H of the Human Resource Policies and Procedures manual for the Public Service on Training and Development.

Succession Management

50. Succession management is an important human resource management strategy that is geared towards ensuring continuation of effective service provision to the public. The examination team noted that the University had not put in place a succession management plan, despite having a number of staff retiring every year. For instance, six staffs have been given contracts after retirement. Further, the University at times takes long time to promote staff despite some enhancing their academic qualification.

Absence of succession management plan can lead to low morale, disruption and delay of service delivery to the public.

The Vice Chancellor and Human Resource Department should develop and operationalize succession management system to ensure sustainability and effective delivery of services to the public. This can be done by ensuring prompt filling of vacant

positions, in line with the staff establishment; Introduction of Management Training Programmes and Young Professional Development Programmes.

Performance Management

51. Performance Management is a systematic process for getting better results from an organization, teams and individuals by managing performance within an agreed framework of planned goals, objectives and standards. It also provides employees with a clear understanding of job expectations, regular feedback about performance, advice and steps for improving Performance, rewards for good performance and sanctions for poor performance.

The Moi University Human Resource Manual section 5.5 requires that "Prior to the beginning of the performance period, departments shall prepare work plans based on their strategic plans and their performance contracts. The work plan shall include the departmental priority objectives from which individual performance targets will be derived.

Individual work plans will be derived from the departmental work plans and the employee's job description. The work plan will describe the performance targets or expected results on assignments and activities for which the employee is responsible for during the performance year.

The employee (Appraisee) will hold discussions with his/her immediate supervisor to agree on the work plan and set performance targets and point out the performance indicators."

The examination team noted that the University was not carrying out the work planning and setting of performance targets. This is a loophole for laxity in execution of duties and may lead to complacency and inefficiency in delivery of services.

The VC should ensure that performance management framework is undertaken in line with the Public Service Commission (Performance Management) Regulations, 2021 and the Human Resource Manual.

Staff Performance Appraisal

52. Under the performance management framework, the University conducts evaluation of staff performance on an annual basis. The examination team noted the following weaknesses on the appraisal process;

- i) The appraisal tool in use is generic for all cadres and functions, there is no separation for teaching and non-teaching staff; or staff in management and lower cadres.
- ii) Individual performance appraisal is based on job descriptions and not from individual work plan drawn from departmental work plan.
- iii) There was no evidence of feedback from supervisors.

These weaknesses may lead to biased or unfair assessment of performance staff.

The Vice Chancellor should ensure that the appraisal tool is reviewed to take into consideration all the relevant cadres and levels of staff of the University.

Staff Disciplinary Processes

53. The examination team noted the following regarding staff disciplinary;

- i) At times the laid down procedures are not followed and there are cases where dismissed staff or aggrieved staff sued the University for unprocedural or unfair or unlawful termination or dismissal or punishment and are reinstated by the courts or awarded financial damages. This is a weakness that may lead to the University incurring legal costs that can be avoided.
- ii) The University staff disciplinary committees handle reported and investigated disciplinary cases. The various minutes of the committee and council resolutions indicate that the common charges are on negligence in the performance of duties, gross misconduct, forgery and theft of university funds, absenteeism and sexual harassment. These are indicators for weak supervision of staff and lack of enforcement of the Code of Conduct and Ethics.

The Vice Chancellor should ensure that the disciplinary procedure laid down in the various legal and binding documents are observed. Also, the Human Resource Policies and the Moi University Code of Conduct and Ethics is enforced.

2.5.1 Payroll Management

Statutory Remittance

54. The University was not remitting some payroll deductions to respective beneficiaries. For instance, the status of unremitted Pension Contribution was Kshs. 2,924,555,200 as at August 2022 while unremitted contribution for members who retired 2015-2021 was Ksh. 211,942,525. Status of unremitted Provident Fund Contributions was Kshs, 252,525,444.90 as at August, 2022 while unremitted contribution for members who retired 2015-2021 was Kshs 58,057,112.

Failure to remit statutory deductions is a loophole that may lead to litigations, penalties and huge interest charged against the University.

The Vice Chancellor should ensure that deductions are promptly remitted to respective institutions.

One Third Rule

55. A review of the September 2022 payroll indicates that about 320 staff have committed their salaries beyond the recommended two thirds (2/3) of basic salary.

This was a contravention of the Employment Act, 2007. It may also lead to officers not being able to meet their financial obligations, and thus suffer pecuniary embarrassment.

The Vice Chancellor should ensure that officers retain at least a third of basic pay after all deductions. This will ensure compliance with section 19 (3) of the Employment Act, 2007 which states that "Without prejudice to any right of recovery of any debt due, and notwithstanding the provisions of any other written law, the total amount of all deductions which under the provisions of subsection (1), may be made by an employer from the wages of his employee at any one time shall not exceed two-thirds of such wages or such additional or other amount as may be prescribed by the Minister either generally or in relation to a specified employer or employee or class of employers or employees or any trade or industry."

2.6 Information and Communications Technology

ICT Governance instruments

56. Governance instruments are intended to provide strategic direction and ensure that ICT initiatives are aligned to the University's Strategic plan and governed by existing legal and regulatory frameworks. The examination team noted the following weaknesses in regard to ICT Governance instruments:

- i) The University does not have an ICT blueprint documentation in place. This is essential in providing a unified university-wide conceptual framework on the acquisition, management and utilization of Information and Communication Technology resources in line with the objectives of the University and emerging trends. This is a weakness that can lead to haphazard acquisition, management and implementation of ICT infrastructure denying the University the opportunity to leverage on service integration, adaptability and cost savings through economies of scale in ICT investments.

- ii) The University is using an outdated Information and Communication Policy that was developed in 2011. This is a weakness that could lead to non-adherence to changes in legislative, institutional and administrative frameworks.

The Vice Chancellor should ensure that: -

- i) *An ICT Roadmap is developed and operationalized by the University. The roadmap should provide a framework for ICT governance, emerging trends and technologies, business systems and applications, IT Business Continuity, Security, project management and information management.*
- ii) *The ICT policy is reviewed to incorporate emerging changes, trends, rapid technological advancement and new requirements.*

IT Governing Committees

57. IT Governance Standard developed by ICT Authority requires MDCAs to constitute and operationalize two ICT governance committees, these are: -

- i) IT Strategy committee to provide strategic advice on ICT initiatives and investments to the board; and
- ii) IT Steering Committee to define the IT mission and goals aligned with the strategic direction of the organization; authorize and direct the development of the services and operation plans.

The University had not constituted these Committees which would provide strategic guidance and oversight in the acquisition, deployment, management and operation of ICT resources, infrastructure, processes and system across the entire University.

Failure to establish and operationalize these committees is a loophole for exercise of discretion in ICT decision making.

The Vice Chancellor should constitute and operationalize the IT Governing Committees in order to promote a unified approach in ICT decision making.

Management of Information Systems

58. The University has procured or developed a number of information systems to support academic and administrative processes in the different schools and campuses. During the review, it was noted that the ICT Department does not maintain an inventory of all the information systems in the university, in addition there is no framework to guide on procurement, hosting, management and maintenance of the Information systems. For instance, the payroll system (Memory Soft) is in Finance; the Student Management Information system (SMIS) was being hosted by a vendor.

Lack of University wide guidance on management of Information systems creates room for discretion and compromises integrity of the University data.

The Vice Chancellor and ICT Director should; -

- i) Issue guidance on acquisition, development and management of Information Systems.*
- ii) Carry out an audit of all existing Information Systems.*
- iii) Maintain an inventory of all the Information Systems in the University.*
- iv) Ensure all the ICT information systems are centrally hosted and managed by the ICT department to enhance accountability.*

Enterprise Resource Planning System

59. Moi University procured and implemented an Enterprise Resource Planning System – Microsoft Dynamics Nav 2018 from Dynasoft Solutions Limited. It was officially launched on 5th July 2019. The system has various modules which include Finance, Academics, Procurement, Human Resource Management, Hostel, Hospital, Transport, Legal and Security.

The examination team noted the following;

- i) The system had not been documented and user manual issued to the University.
- ii) The system was launched on 5th July, 2019 but at the time of the review 3 years later, some modules had not been fully completed. There was no implementation schedule with specific timeframe on expected period of completion. For instance, the procurement module, Health services module, transport module and legal module had no implementation schedules.
- iii) The system did not have adequate controls such as segregation of duties, hence allowed unauthorized transactions. For instance, there was a reported case of three officers who were involved in irregular uploading of students' marks.
- iv) The system did not have an in-built validation or automatic check that could assist in carrying out relevant computations and detecting errors in the system. As a result, some of the financial reports generated had errors;
- v) While many departments had raised concerns on areas of improvement on the ERP system, there was no implementation plan for resolution of emerging issues in a systematic and comprehensive manner.
- vi) The University had procured limited licenses, only 50 users can concurrently access the system at the same time. It was observed that users had to occasionally wait for others to log off before accessing the system.

- vii) While data migration process had been carried out before the launch of the system, there was still unreconciled electronic data in the system for example the leave balances.
- viii) The ERP software needs the following compatible computer specifications to function: Windows 10 and above; Memory – 4 GB RAM and Processor – Core i7. It was noted that some computers in the University had lower specifications hence not compatible. For example, Computers in the Main Registry.
- ix) Some Schools were allocated only one ICT support officers, who would get overwhelmed by the number of support requests.

Most of the challenges currently being faced by the university can be attributed by the weak ERP system. The system has failed to streamline various tasks and operations across departments/ faculties. These are weaknesses that compromises security and reliability of data, delay processes and affect service delivery.

The Vice Chancellor should ensure that the implementation of the ERP system is fully completed and outstanding issues resolved expeditiously. The University should explore options to undertake this since the one-year grace period after the launch of the ERP has lapsed as per the agreement with the contractor.

Email Management

60. The University was using googleApps Workspace and Zimbra for official email management. At the time of the examination, it was noted that the Zimbra mail server was full and further, most staff were using their personal emails for official purposes contrary to the Head of Public Service circular to public institutions Ref: SH/ADM/23 (1) date 14th June, 2022 on use of personal email addresses for official government business.

These are weaknesses that compromise the availability, integrity and confidentiality of emails and expose University information to access by unauthorized parties.

The Vice Chancellor should expedite the upgrading of the Zimbra mail server and discourage use of personal email for official use. This can be done by developing and implementing comprehensive email management policies to guide usage of official email accounts and general communication through official emails.

Network Security

61. The University has the following networks in place: Fiber backbone network, Wide Area Network (WAN), Local Area Network (LAN) and Wi-Fi. During the review the examination team noted the following:

- i) The University had ageing infrastructure which includes routers and switches.
- ii) The University had not procured any network security appliance like firewall.
- iii) There is no Network access control and monitoring solutions.

These are weaknesses that can allow for external malicious intrusion into the network which can lead to spreading of malware and other threats that can harm ICT infrastructure and leave the University vulnerable to attack and data loss.

The Vice Chancellor should:

- i) Consider procuring network security appliances such as Firewalls, and Intrusion Detection and Prevention systems for ICT domains where critical systems are used;*
- ii) Ensure Network access control and monitoring solutions are implemented to guarantee real-time detection and control restrictions. This ensures protection against viruses, spyware and other security threats that are transmitted via networks and network enabled applications or that take advantage of un-patched vulnerabilities in operating systems and applications;*
- iii) That all the ageing network infrastructure are replaced; and*
- iv) Consider engaging an independent ICT systems auditor to look at the vulnerability of the University's systems, including cyber security.*

Network Segmentation

62. The University has various network users who range from students – physical and online; staff – teaching and non-teaching; contractors and guests. These users use multiple devices to access the network. The university equally has many applications running in the network. The examination team noted that the University has not created segments or zones of its networks either logically or physically to improve security, protects data in critical systems and boost performance of institutional networks.

Failure to undertake network segmentation renders University's data vulnerable to hackers, cyber-attacks and other threats.

The Vice Chancellor should consider creating secure segmentation of the university network or encryption of critical data to protect Confidentiality, Integrity and Availability (CIA) of data at storage, transit and various processing stages.

ICT Assets Management

63. At the time of examination, the ICT Directorate was maintaining lists of ICT assets of some departments/schools/campuses. However, the following was noted: -

- i) ICT did not have records of ICT assets of the closed campuses that were stored at the stores. As illustrated in the picture below:



ICT assets of the closed campuses at the store

Source: Examination Team

- ii) The ICT department had not undertaken a rationalization exercise to advise on the procurement and distribution of shared common assets like printers, photocopiers, projectors and shredders.
- iii) The ICT department did not maintain records of ICT records due for disposal.

Failure to provide for proper management of ICT assets could lead to losses through theft, vandalism and misuse.

The Vice Chancellor and Director ICT should;

- i) *Maintain an inventory of all the University ICT assets, including their status and location, the inventory should be regularly updated.*

- ii) Carry out an audit of shared ICT assets and advise appropriately to ensure fair distribution and use.*
- iii) Provide adequate and secure storage areas for ICT equipment.*

Physical Security of ICT resources

64. Physical Security refers to protective measures that are applied to prevent unauthorized access to computers, databases and other ICT resources in order to ensure data and information confidentiality, integrity and availability.

The examination team noted that the University had not put in place adequate physical security to areas that stored sensitive or critical information. For instance, the payroll system (Memory Soft) used by the University is installed in a machine at the payroll office together with its server. The access to the payroll office is not restricted but accessible to other staff.

Failure to implement sufficient physical security to areas that have sensitive and critical data risks unauthorized access, manipulation of data and breach of security.

The Vice Chancellor should ensure that access to areas where confidential information is processed or stored is restricted to authorized individuals only.

ICT Incident Management

65. The team noted that there are cases where real time transactions of Information Systems stops abruptly or information is lost when power interruption is experienced or unscheduled information system downtime. For instance, the ERP Navision Server crashed in 1st quarter of FY 2021/2022 and uptime data of the first two months of the quarter was lost.

This is a weakness that result to disruption of business operations and delays in service delivery.

The Vice Chancellor and Director ICT should;

- i) Develop and implement effective Incident Response, Crisis Management and Communication Plans stipulating incident impacts and suitable preventative, detective and corrective controls.*
- ii) Consider having redundancies of critical components or functions of ICT systems to create reliability and availability of a system and services.*

ICT Change Management

66. The examination team noted that despite some processes having been automated, some departments were still using the manual system. For instances; leave processing and approvals; requisition in supply chain management and stores management. Failure to manage and plan for ICT changes is a weakness that may lead to resistance to change by stakeholders resulting to uncoordinated implementations, which may disrupt operations and affect service delivery.

The Vice Chancellor and the Director ICT should conduct elaborate and consistent ICT awareness sessions and trainings, this is to ensure better understanding, acceptance and compliance in ICT initiatives.

2.7 Academics, Research, Extension and Student Affairs

Examinations

67. The University Common Rules and Regulations Governing Undergraduate Examinations, Graduation and Certification, October, 2022 provided the duties of an Internal Examiner to including certification of the total number of scripts received in an examination and standardized marking of scripts based on detailed and well-structured marking scheme. The Rules also provide for engagement of External Examiners for quality assurance and moderation of examination processes. Common issues raised by External Examiners in marking and recording marks indicated that the Rules and Regulations were not being adhered to as follows:

- i) Some student exam sheets were not recorded in the mark sheet;
- ii) The number of exam booklets exceeded the number of students with exam marks recorded on the mark sheets;
- iii) Lecturers indicated overall marks for questions marked without accounting for every point given;
- iv) Full marks were awarded for inadequate answers. For example, students got full marks for merely 'stating' while the questions had required them to 'evaluate', 'explain' or 'examine';
- v) Proper marking schemes or guides were not provided.

Further, the following examination irregularities were noted:

- i) In some instances, some lecturers allowed students with fee arrears to sit exams without exam cards. This practice contravenes Rules and Regulations Governing the Conduct and Discipline of Students, 7th Edition, Leakage of

- Examination, Instructions to Candidates and Invigilators (f) which provides that 'Candidates who do not have examination cards shall not be allowed to sit an examination'; and
- ii) In other instances, Students, who were members of staff and graduated in 2011, irregularly collected their Post Graduate Diploma Certificates without clearing fees arrears of Ksh. 67,450 and 84,900 as indicated in a report REF: MU/ADM/S&S/SC/52/24 dated 25th April, 2022.

These weaknesses contravene the University Rules and Regulations, indicate complacency in the primary administration of examinations and can be used to perpetuate examination malpractices including incidences of bribery.

The Vice Chancellor should ensure that all administrators of examination adhere to the University 'Common Rules and Regulations Governing Undergraduate Examinations, Graduation and Certification' and 'Rules and Regulations Governing the Conduct and Discipline of Students, 7th Edition'. Further, employees found culpable of contravening the provisions should be held accountable for errors committed.

Correction of Certificates

68. It was noted that during printing of certificates, some errors occurred, necessitating students to return the certificates to the university for correction. Errors noted were on degree classification, programme naming and student names (spelling, order, omission and deletion). At times, procedure for correction of Students Certificates is not adhered to. For instance, in correction of names of a certificate for a student Reg. No. ***/***/*51/2012, the application form 3c was not filled, no record of acceptance of the returned certificate or listing on certificates for correction was maintained. Consequently, the certificate was deemed missing until a physical search was conducted in the registry where it was found.

Failure to adhere to procedure for correction of certificate leads to difficulty in retrieval and delayed service delivery, which could provide opportunities for bribery and extortion.

The Vice Chancellor should ensure that:

- i) *The Internal Procedure for Correction of Certificates after Graduation, 2022, which requires filling form 3C 'Application for correction of certificate, attaching required documents and payment of the fee is complied with.*

- ii) A mechanism to enable verification of student information before printing of certificates is developed and implemented. This will enhance accuracy and reduce errors.*

Disposal of Returned Certificates

69. Students may return certificates for correction after graduation, whereby they are issued with new (corrected) certificates. However, the University has not provided for disposal of the old (returned) certificates. The examination team was informed that the returned certificates are simply shredded.

Failure to institute a mechanism for disposal of returned certificates is a loophole that can be exploited to perpetrate academic fraud and may provide opportunities for bribery and extortion.

The Vice Chancellor should ensure that a transparent mechanism for disposal of returned certificates is developed and implemented.

Management of Scholarships

70. The University provides scholarship opportunities funded by different individuals and corporates. The scholarship partner can provide the criteria for award of scholarship. Where a criterion is not provided, the University has established an internal procedure for award of scholarships. It was noted that at times, bursaries and scholarship opportunities were awarded irregularly thereby denying the deserving students' available slots. In one instance, the criteria for award of scholarships by Kenya Community Development Foundation was flouted. An individual instead of a committee developed the list of nominees for award of scholarships and some nominees identified for the award of the previously mentioned scholarships had already cleared their fees, contrary to the criteria provided. This was indicated in a report Ref: mu/adm/s&s/sc/52/25 dated 2th April, 2022.

Laxity in supervision and management of scholarships can lead to discretion decision making resulting to misuse of funds and unfair award of bursaries.

The Vice Chancellor should ensure that a mechanism for monitoring the management of bursaries is developed and implemented. The mechanism should include measures to enhance supervision, transparency and fairness in the bursary allocation processes.

Pirating in Student Accommodation

71. Pirating is an informal arrangement whereby a student allows another to occupy university accommodation registered to the former. Such cases were commonly reported at the University indicating laxity in enforcement of accommodation rules.

This is a weakness, which could lead to unrealized revenue from hostel fees. It also indicates possible bribery and extortion amongst students and collusion with hostel staff.

The Vice Chancellor should establish mechanisms to enhance supervision in accommodation facilities and enforce the rules and Regulations governing the conduct and discipline of students, 7th Edition, which provide that it shall be an offence to pirate in the University Hostels.

Occupancy

72. At the time of the examination, the University hostel inventory stood at **** which would have accommodated ****students. However, only***** hostels were occupied. Students cited the following reasons for low uptake of the hostels: Theft of personal effects in students' halls; strict university rules; poor hygiene standards in wet areas; lack of basic amenities such as power supply, broken windowpanes and dilapidated state of hostel buildings. This was indicated in an internal memo ref: MU/RSA/PC/21 dated 8th June, 2022.

This weakness led to low occupancy levels in the hostels indicating unrealized revenue targets for the University.

The Vice Chancellor should ensure that budgetary allocation for renovation and improvement of living standards at the University hostels is undertaken.

2.8 Administration

Physical Security

73. Physical security entails security measures in place to deny unauthorized access to facilities, equipment and resources and to protect employees, students and assets from damage or harm. It was noted that varied nature of security breaches occur within the University premises. For instance, theft of student property and muggings around student hostels was reported as indicated in the security status report dated

30th Sept 2021. Encroachment on University land, Destruction and theft of trees at University farm and illegal grazing within university premises was also reported.

These were occasioned by failure to enforce curfew hours for students, weak door locks, inadequate street lighting, and lack of security installations such as CCTV and perimeter fence. Recommendations on resolving the breaches were made to the VC but had not been fully implemented by the time of the examination.

These weaknesses compromise the physical security of University staff, students and assets and can lead to litigation and loss of university assets.

The Vice Chancellor should ensure that systems to improve the physical security of staff, students and assets are installed.

Transport, Fleet and Fuel Management

74. At the time of the Examination, the University was in the process of reviewing the transport policy. The following was noted in this area:

- i) The University used cash imprest which was reimbursed on a monthly basis for purchase of fuel for University vehicles. At times, some departments ran out of the cash for fuel before reimbursement was due and 'borrowed' fuel from others. For instance, an internal memo ref MU/HS/T/12 dated 26th October 2022 showed that Health Services Unit had run out of fuel for the ambulance and thus borrowed fuel from public Health Unit.
- ii) Work ticket reconciliation on fuel consumption between fuel registers, work tickets, fuel purchase receipts and approvals to undertake official journeys were not undertaken.
- iii) Records for management of vehicles such as vehicle register, vehicle logbook – GP55, fuel registers and detail orders were not maintained for some vehicles. Where they were maintained, they were not comprehensive, as some details were not indicated.
- iv) Some drivers made local arrangements with undesignated persons to drive vehicles allocated to them. This was shown in an internal memo referenced MU/HS/T/12 on the University ambulance being driven by unauthorized persons.
- v) An instance of misuse of university vehicle and fuel was noted whereby a driver left the university premises with a vehicle without authority.

Use of cash imprest to purchase fuel is a system that is prone to fuel fraud, which may take the form of fueling private vehicles using University funds and collision.

Failure to maintain accurate fleet management records may lead to difficulties in determining vehicle-running costs, managing fuel efficiently and may provide opportunities for inappropriate use of vehicles, including loss or uncoordinated disposal of vehicles.

The Vice Chancellor should ensure that;

- i) A system for efficient fleet and fuel management is instituted;*
- ii) Work ticket reconciliation on mileage and fuel consumption is undertaken on a regular basis;*
- iii) Fleet management records are accurately maintained and all required details comprehensively captured; and*
- iv) Supervision on transport operations is enhanced to ensure accountability for vehicles and passengers/assets.*

2.9 Records Management

Records Management Policy

75. The University has not developed and implemented a comprehensive records management policy to enhance governance in authenticity, integrity, accountability and transparency in its operations. Consequently, records management processes such as classification, appraisal, disposal, transfer of records among others are dependent on the discretion of records management officers.

Failure to develop and implement a records management policy may lead to inefficiencies in work processes, congested records storage areas, safety concerns in preservation of records and delays or difficulty in retrieval of records.

The Vice Chancellor should ensure the development and implementation of records management policy that includes; guidelines for creation, classification, physical movement, appraisal, retention, disaster management and disposal of records for the University.

Registry Processes

76. Public institutions are expected to establish Records Management Units (registries) that receive, maintain, process and control the flow of information and other records. Certain classified documents require a much higher degree of protection of disclosure to unauthorized persons hence the need for establishment of different registries such

as, top secret, confidential, central, staff, technical and mail. The University's has established various registries, which are the repositories for all employee, student and administrative records. The following issues were noted in registry operations;

- i) The University file classification system provided for confidential records. However, there was no provision for a confidential registry. Instead, records classified as confidential were kept at the Office of the Deputy Vice Chancellor. A request from the Deputy Registrar, Central Services to The Registrar Admissions vide a memo referenced MU/ADM/1/50 dated 9th August, 2018 indicated the need to establish a confidential section in the central registry. This request had not been implemented by the time of the Examination.

This weakness exposes confidential records to the risk of leakage of information.

- ii) The Central Registry did not maintain a comprehensive file index for ease of reference during retrieval of physical files. Instead, file indexes existed for various classes of documents.

Failure to maintain a comprehensive file index is a loophole for difficulty in retrieval of files, misfiling and missing files. It could also lead to opening of files for subjects where files already exist thereby distorting the flow of information.

- iii) The University had not prepared records retention and disposal schedule, which is a document describing all types of records and contains predetermined retention periods and prescribed disposal actions to be taken once a record, is no longer required for the conduct of current University business.

This is a weakness that leads to congestion in the registry as inactive documents take up space that could be utilised for active files. It also increases difficulty in retrieval of documents, which may give room for poor service delivery, bribery and extortion.

The Vice Chancellor should ensure that registry processes are streamlined to establish a confidential registry to protect sensitive information from unauthorised access; prepare a comprehensive file index; determine records retention and disposal

processes in order to improve efficiency and save time during record retrieval, save records storage space and equipment and safeguard records against damage.

Records Storage Facilities and Space

77. It was observed that the University lacked adequate storage space and facilities for efficient management of records. For instance;

- i) At the Central registry, space allocated for storage of records was inadequate. Facilities provided such as storage cabinets, binders and file folders were inadequate. Closed files were stored in the same area as active files. Additional fireproof steel cabinets were required. In addition, two computers in the registry had broken down. The insufficiency on space and facilities and computers had been identified vide Internal memos ref: MU/ACD/DR/PU/18 dated 22 September 2022 requesting for additional storage and office space; and MU/ADM/1/50 dated 11th October, 2022 respectively. By the time of the examination, the requests had not been serviced.



Closed Files stored in open shelves within Central Registry

Failure to provide adequate registry space and facilities exposed the records to unfavorable conditions, leading to accelerated deterioration of records. It may also lead to difficulty in retrieval of records

- ii) The University procedure for admissions requires that the Deputy Registrar, Admissions open a file for each student using the registration number within 3 months after registration. However, Internal memo ref: MU/ACD/DR/PUR/18 dated 13th May, 2022, which was a 9th reminder on required admission

materials indicates that the university had admitted 4 consecutive cohorts of students without maintaining personal files for them. As such, student records were lumped in batches classified by courses and student registration numbers.

Failure to provide personal files for students' admission had led to difficulties in retrieving student information, which may provide opportunities for bribery by students or extortion by registry staff during requests and retrieval for records.

The Vice Chancellor should ensure that adequate budgetary provision is provided to support records management space and facilities.

Safety of Records

78. The University had installed fire extinguishers at the registry to enhance disaster response in the event of fire. However, an electric coil cooker had been installed inside the registry premises to prepare beverages for the registry staff.



Cooking area within the Central Registry

Source: Examination Team

This weakness compromises the safety of documents against the risk of fire.

The Vice Chancellor should ensure that kitchen space is allocated elsewhere, away from document storage areas. Installation of cooking equipment in offices and registries should be strictly prohibited.

CONCLUSION

Kenya recognizes that education is key for economic empowerment through building a sustainable human capital and is an irreplaceable investment in realizing enhanced productivity, social and economic growth. This is envisaged in Articles 53 (1) and 55 (a) of the Constitution of Kenya which emphasize every child's right to free and compulsory basic education and the importance of the State taking measures to ensure that youth access relevant education and training. Thus, Universities' important role in economic development of the Country cannot be underscored.

Imperatively, Moi University continues to play a fundamental role in in the development of human capital to support implementation of global, regional and national development agenda, through progressive research and knowledge impartment. Pitted against other public Universities, Moi University is inevitably grappling with common sectoral challenges in management of higher education, notably; inadequate funds due to various issues including the reduction of money disbursed by the National Treasury, surging enrolment following the lowering of university entry grade to C+, and a low number of parallel students which forced closure of some satellite campuses. Others include bloated workforce and increased debt to staff and suppliers.

The examination into the operational and financial management systems, policies, procedures and practices of Moi University revealed inherent weaknesses and corruption loopholes, which have been highlighted in this report. These need to be addressed in order to promote effective and efficient service delivery at the University. Recommendations set out in this report, when implemented, will assist in sealing corruption loopholes and strengthening operational systems within the examined functions of the University. The Vice Chancellor, being the Accounting Officer of the University is expected to immediately, upon presentation of the report, embark on the implementation of the recommendations provided in the report. The process of implementation of the recommendations spearheaded by the Management, will be sustained when all staff across board, embrace the change while stakeholders take up their role in supporting implementation.

The implementation of the report will require the University to prepare a comprehensive implementation plan incorporating all the issues raised. The implementation plan is to be forwarded to the Commission within one month after the presentation of the report. The Plan will assist EACC to continuously monitor the implementation progress and address any emerging issues.

BIBLIOGRAPHY

1. Anti-Corruption and Economic Crimes Act, 2003
2. Audit Strategic Plan
3. Creditors Management Plan
4. Creditors Management Policy
5. Ethics and Anti-Corruption Commission Act, 2011
6. Fees Payment Policy
7. Finance Policy and Procedure Manual
8. ICT Roadmap
9. Leadership and Integrity Act 2012
10. Monitoring and Evaluation Framework of Implementation of Council Resolutions
11. Policy or Framework on Management of MOUs
12. Procurement Manual
13. Public Finance (National Government) Regulations, 2015
14. Public Finance Management Act, 2012
15. Public Officers and Ethics Act, 2003
16. Public Procurement and Assets Disposal Act, 2015
17. Public Procurement and Assets Disposal Regulations, 2020
18. Records Management Policy
19. Resource Mobilization Policy
20. Strategic Plan
21. Succession Management Plan
22. University Calendar
23. University Masterplan

APPENDICES

Appendix I: Officers Interviewed

1. Ag. Chief Accountant
2. Ag. Chief Finance Officer
3. Ag. Chief Internal Auditor
4. Ag. Dean of Students
5. Ag. Deputy Register Central Services
6. Ag. Deputy Registrar Human Resource
7. Ag. Deputy Registrar Human Resource – Recruitment & Training
8. Ag. Deputy Registrar Planning
9. Ag. Deputy Registrar Student Affairs
10. Ag. Deputy Vice - Chancellor - Administration, Planning and Strategy
11. Ag. Head of Corporate Affairs & Protocol
12. Ag. Head of Development & Maintenance
13. Ag. Registrar Quality Assurance, Compliance & Performance Contracting
14. Assistant Registrar RMEDIA
15. Budget & Votebook Accountant
16. Catering & Accommodation Accountants
17. Chief Security Officers
18. Council Secretariat
19. Deputy Register Admissions
20. Deputy Vice - Chancellor - Academics, Research, Extension and Student Affairs
21. Director, Directorate of Information and Communication Technology (ICT)
22. Expenditures Accountant
23. In charge Central Registry
24. In charge of Intelligence
25. Moi University Council Chairman and two members
26. Payroll Accountant
27. Personal Claims Accountant
28. Procurement Officer
29. Revenue Accountant
30. Senior Legal Officer
31. Snr. Administration Assistant – Human Resource
32. Snr. Maintenance Officer
33. Snr. Medical Officer
34. Students Finance Accountant
35. Transport Officer
36. Vice Chancellor/ Accounting Officer Moi University

Appendix II: List of Moi University Policies and Procedures

SNo.	POLICY/MANUAL /PLAN	STATUS
1.	Strategic Plan	To be prepared
2.	University Calendar	
3.	Procurement Manual	
4.	Fees Payment Policy	
5.	Resource Mobilization Policy	
6.	Creditors Management Plan	
7.	Creditors Management Policy	
8.	Records Management Policy	
9.	Policy or Framework on Management of MOUs	
10.	Monitoring and Evaluation Framework of Implementation of Council Resolutions	
11.	Audit Strategic Plan	
12.	Succession Management Plan	
13.	ICT Roadmap	
14.	University Masterplan	
15.	Finance Policy and Procedure Manual	Yet to be submitted for consideration by University Management Board
16.	Policy of Policies	
17.	Chaplaincy Policy	
18.	Policy on Data Protection and Privacy	
19.	Research Commercialization Policy	
20.	Out Growers Policy	
21.	Apples Marketing Policy	To be discussed in Moi University Management Board
22.	Policy of Leasing of Business Premises in the University	
23.	Alcohol and Drug Abuse Policy	
24.	Security and Safety Policy and Procedures	
25.	Transport and Travel Policy	
26.	Review of ICT Policy	Pending Policies in the Senate
27.	Sexual Harassment & Discrimination Policy	
28.	Review of Disability Policy	
29.	Development of MU Science & Technology Park Policy	
30.	Quality Assurance and Performance Management Policy	
31.	Moi University Science Park Policy	
32.	Water Policy	To be discussed in the University Council
33.	Naming of Buildings and structures Policy	

Appendix III: Outstanding Imprest as at 31st October 2022

DATE	PF NO	IMPREST	AMOUNT	PURPOSE
8/25/2000	5882	IMP22-00226	42,000.00	Fuel and Staff Lunches
3/31/2021	4717	IMP20-00750	88,200.00	Settlement Allowance
3/31/2021	4845	IMP20-00753	3,000.00	Fuel for Ambulance
5/13/2021	4836	IMP21-01303	45,600.00	Funds Travel to Thika
6/10/2021	6767	IMP21-01434	619,000.00	Research Fund
9/15/2021	2780	IMP22-00196	1,684,689.00	Research
9/28/2021	4740	IMP21-00460	183,420.00	Attend Short Courses
11/24/2021	4822	IMP21-00712	187,000.00	Field Trip for Post Graduate Students
1/5/2022	5645	IMP21-00850	519,645.00	Host Moralities Workshop
1/25/2022	4189	IMP21-00891	61,200.00	Inspection of University Vehicles
2/2/2022	6471	IMP21-00917	1,129,993.00	Mu Acc Research Fund
2/8/2022	4319	IMP21-00933	28,000.00	Evaluation Committee
2/9/2022	6069	IMP21-00937	869,191.00	Purchase of Irrigation Pipes
2/10/2022	5974	IMP21-00953	1,255,779.00	Mu Acc Funds to Host Workshop
2/10/2022	6388	IMP21-00948	360,590.00	Settling Up Field Experiments
2/18/2022	5760	IMP21-00987	1,085,876.00	Mu Acc Finance Training
2/21/2022	4215	IMP21-000994	593,700.00	Facilitation Incubatees
3/10/2022	3205	IMP21-01067	853,510.00	Mu Acc Blended Workshop
3/12/2022	6164	IMP21-01071	304,520.00	Research Fund
3/23/2022	5716	IMP21-01118	424,000.00	Perdiem and Fuel
3/23/2022	6083	IMP21-001117	80,000.00	Honorarium for Guest Lecturers
4/12/2022	6312	IMP21-01184	757,895.00	Workshop
4/13/2022	3437	IMP21-00188	137,448.00	For Workshop
4/21/2022	6314	IMP22-01207	18,000.00	Analysis of Samples at Kirdi Nrb
5/6/2022	6363	IMP22-01258	506,800.00	Staff Perdiem
5/11/2022	5636	IMP21-01278	104,000.00	For Reconnaice For Two Lecturers Three Days and Transport
5/16/2022	6042	IMP21-01310	735,275.00	Workshop Practice
5/17/2022	6910	IMP21-01315	128,000.00	Hire of Prisoners to Work in Apple Farm
5/25/2022	6270	IMP21-01353	195,705.00	Research Fund
5/26/2022	6527	IMP21-01364	350,345.00	Supervision of Phd Student
6/6/2022	6439	IMP21-01407	190,000.00	Research Fund
6/9/2022	4328	IMP21-01427	549,629.00	Scarpe A Activities
6/9/2022	5072	IMP21-01429	666,490.00	Post Document Research
6/9/2022	5637	IMP2-01430	666,490.00	Post Document Research
6/13/2022	3225	IMP21-01450	426,215.00	35th Student Council Election
6/16/2022	3860	IMP21-01472	304,204.00	For Installation Of 128 Device at Ict
6/16/2022	5870	IMP21-01469	885,800.00	Network Workshop
6/21/2022	2996	IMP21-01405	74,000.00	Research

DATE	PF NO	IMPREST	AMOUNT	PURPOSE
6/22/2022	4555	IMP21-01495	795,552.00	Funds to Hold Rs Affiliation
6/22/2022	4663	IMP21-00094	311,132.80	Research Funds
6/22/2022	4695	IMP21-01498	25,911.00	Brake Lining Replacement
6/24/2022	4135	IMP21-01507	972,000.00	Research Project
7/7/2022	3523	IMP22-00012	982,341.00	Unep Intex Training of Smes
7/8/2022	2207	IMP22-00027	141,906.00	Correction of Certificates
7/8/2022	4289	IMP22-00029	798,000.00	Cobes 11 Facilitation
7/8/2022	6215	IMP22-00023	192,000.00	Field Course
7/12/2022	4599	IMP22-00039	140,300.00	Transportation of Exams
7/13/2022	2610	IMP22-00069	184,000.00	For Lerrn Research
7/13/2022	3181	IMP22-00046	134,600.00	Muso Leaders
7/13/2022	4193	IMP22-00052	1,348,700.00	3rd and 4th
7/13/2022	4602	IMP22-00070	1,180,078.00	Purchase of Reagents
7/13/2022	4608	IMP22-00043	1,480,675.00	Muso Leaders Induction
7/13/2022	5869	IMP22-000049	314,750.00	Attachment Search For 3rd \$ 4th Year
7/13/2022	5923	IMP22-00058	780,600.00	Field Attachment of Class 022
7/13/2022	5925	IMP22-00059	671,000.00	Field Attachment Group 2020
7/13/2022	5973	IMP22-00068	1,644,300.00	Attachment Supervision
7/13/2022	6523	IMP22-00067	1,756,200.00	Field Attachment
7/14/2022	3108	IMP22-00078	399,400.00	Field Trip
7/14/2022	3617	IMP22-00089	80,000.00	Fuel for Cobes Supervision
7/14/2022	4242	IMP22-00080	518,400.00	For Field Course
7/15/2022	4639	IMP22-00487	703,668.00	Workshop for Training Health Workers
7/18/2022	4772	IMP22-00114	46,400.00	University Officials to Attend Court
7/18/2022	5679	IMP22-00104	693,000.00	15th Internal Audit Follow Up
7/19/2022	4262	IMP21-000111	32,000.00	Academic Field Course
7/19/2022	4587	IMP22-00123	15,000.00	Local Running of Exams
7/21/2022	6484	IMP21-000115	1,432,500.00	Field Trip
7/26/2022	69	IMP22-00150	137,000.00	Supervision
7/27/2022	2838	IMP21-00166	42,250.00	Collection of University Property
7/27/2022	5076	IMP22-00157	423,200.00	Field Courses
7/27/2022	5241	IMP22-00158	143,862.00	Deputy Vc Appreciation Dinner
8/1/2022	4152	IMP22-00177	1,849,571.00	Research Project
8/1/2022	5622	IMP22-00179	2,120,750.00	Carrying Out Leve 2 Support
8/1/2022	6522	IMP22-00173	660,100.00	Field Attachment
8/2/2022	1570	IMP22-00125	154,803.00	Purchase of Shade Net for Apple Farm
8/3/2022	4224	IMP22-00188	622,500.00	Post Graduate Supervision
8/3/2022	6581	IMP22-00189	385,560.00	Purchase Ftir 7600detector
8/5/2022	1479	IMP22-00197	200,000.00	Research Fund for Learn Project
8/10/2022	6476	IMP22-00437	1,273,700.00	Budget for Mtc Research Project Defenses

DATE	PF NO	IMPREST	AMOUNT	PURPOSE
8/19/2022	4480	IMP22-00202	118,200.00	Relocation of University Inventory from Kiptagic
8/24/2022	3188	IMP22-00213	126,100.00	Field Work
8/29/2022	6446	IMP22-00239	44,224.00	Procurement of Executive High Back Chair
8/31/2022	2780	IMP22-00196	1,684,689.00	Research
9/8/2022	6465	IMP22-00292	1,063,780.00	Facilitation to hold a curriculum Review
9/14/2022	5962	IMP22-00307	1,002,910.00	Host Mu Acc Islamic Culture Project
9/15/2022	5704	IMP22-00313	507,520.00	Participate in Leap Stakeholders
9/15/2022	5723	IMP22-00319	8,060.00	Being for Service Gkb 609m
9/15/2022	6289	IMP21-00394	20,000.00	Field Trip
9/19/2022	4231	IMP22-00120	129,883.00	To Attend Data Protection Training
9/20/2022	3661	IMP22-00333	1,293,269.00	Perdiem of Workshop
9/21/2022	5451	IMP22-00340	216,622.00	Purchase of Dry Goods
10/3/2022	3400	IMP22-00402	11,300.00	Funds to Collect Braille Machine
10/3/2022	3414	IMP22-00407	12,000.00	Fuel for Kck 581u
10/3/2022	3836	IMP22-00399	255,897.00	To Host Mu Acc
10/3/2022	3976	IMP22-00403	80,000.00	For Fuel
10/3/2022	6629	IMP22-000400	202,660.00	Stipend Payment
10/5/2022	4344	IMP22-00424	229,696.00	Curriculum Review Workshop
10/5/2022	5802	IMP22-00422	214,752.00	Performance Contract Committee
10/5/2022	6659	IMP22-00418	108,000.00	Funeral Expenses
10/6/2022	4818	IMP22-00429	199,800.00	Research Funds Toconduct Projects
10/6/2022	5733	IMP22-00428	199,500.00	Conduct Mu Acc Project Research
10/6/2022	6329	IMP22-00426	1,346,332.00	Workshop
10/6/2022	6647	IMP22-00427	735,536.00	Purchase of Irrigation Pipes
10/11/2022	5966	IMP22-00436	659,600.00	Council Members Meeting
10/12/2022	1693	IMP22-00444	44,150.00	Purchase of Drugs and Supplements
10/12/2022	4821	IMP22-00452	466,997.00	Regional Staff Exchange
10/12/2022	5684	IMP22-00445	2,078,500.00	Field Attachment of Class 022
10/12/2022	5975	IMP22-00449	1,617,693.00	Council Members and Staff Allowances
10/12/2022	6441	IMP22-00441	684,647.00	Travel to U S for Ace11 Ptre Project
10/12/2022	6708	IMP22-00448	237,900.00	Student Assessment
10/13/2022	4090	IMP22-000455	369,166.00	Aceii Tam Meeting
10/13/2022	4203	IMP22-00453	161,421.00	To Attent Ey Tax Retreat
10/13/2022	4349	IMP22-00460	599,400.00	Mu Mgt Training
10/13/2022	4740	IMP22-00456	52,750.00	Attend Crest Alumni Networking
10/13/2022	6169	IMP22-00457	219,000.00	Facilitation for Field Data Collection
10/14/2022	5463	IMP22-00462	263,000.00	Travel to Open University of Tz
10/14/2022	5964	IMP22-00461	98,483.00	Attend Public Sector Accounting Conference

DATE	PF NO	IMPREST	AMOUNT	PURPOSE
10/17/2022	4246	IMP22-00470	175,547.00	Purchase of Furniture and Equipment
10/17/2022	5258	IMP22-00468	125,110.00	For Kitale Show
10/18/2022	3257	IMP22-00475	2,038,991.00	Training of Smes
10/18/2022	5670	IMP22-00472	57,250.00	Burial Expenses for My Husband Mr. Julius Mbaria
10/18/2022	6432	IMP22-00477	150,200.00	Staff and Students Perdiem
10/21/2022	1422	IMP22-00483	255,966.00	Ace11 For Kitale Show
10/21/2022	4353	IMP22-00484	534,000.00	Field Trip
10/21/2022	4802	IMP22-00485	833,625.75	Council Member Attending Appointment
10/21/2022	4885	IMP22-00481	124,455.00	Facilitate for Kitale Show
10/21/2022	5374	IMP22-00488	74,297.00	Perdiem To Kitale
10/21/2022	6163	IMP22-00489	361,022.00	Gcrf Catalyst Project
10/21/2022	6465	IMP22-00482	97,780.00	Exhibition by Ptre In Kitale
10/24/2022	3757	IMP22-00492	183,600.00	Consultative Meeting
10/24/2022	3980	IMP22-00494	141,975.00	For Ask Show in Kitale
10/24/2022	6649	IMP22-00491	45,000.00	For Ack Kitale Show
10/25/2022	6222	IMP22-00498	30,000.00	Picking Re-Certificate
10/25/2022	6489	IMP22-00500	88,200.00	Funeral Expenses
10/25/2022	6838	IMP22-00499	100,000.00	Reimbursable Petty Cash Float
10/26/2022	6434	IMP22-00148	49,800.00	Training on Maisha 2 Online
10/27/2022	3720	IMP22-00514	109,700.00	Burial Expenses
10/27/2022	4348	IMP22-00512	85,600.00	Perdiem And Transport T Nairobi
10/28/2022	6162	IMP22-00518	383,200.00	Field Trip
10/31/2022	2880	IMP22-00467	2,845,200.00	Research
			69,281,740.55	

Appendix IV: Claim for Part Time Lecturers

SNo.	SCHOOL	NO OF LECTURERS	AMOUNT
1.	Agriculture & Natural Resources	41	7,215,300.00
2.	Education	153	35,610,600.00
3.	Information Sciences	76	10,430,582.96
4.	Arts a & Social Sciences	To provide	52,486,010.00
5.	Engineering	31	4,237,700.00
6.	Physics & Biological Sciences	143	26,358,300.00
7.	Nursing	To provide	698,595.00
8.	Dentistry	To provide	640,642.50
9.	Medicine	To provide	1,419,210.00
10.	Public Health	To provide	471,870.00
11.	Institute of Biomedical Informatics	To provide	859,125.00
12.	ELDORET WEST CAMPUS	To provide	29,433,300.00
13.	NAIROBI CAMPUS	To provide	20,028,851.00
14.	COAST CAMPUS	To provide	24,499,800.00
15.	KITALE	To provide	1,404,000.00
16.	KERICHO	To provide	2,203,000.00
17.	NAKURU	To provide	3,010,950.00
18.	SBE DIPLOMA	To provide	13,411,677.00
19.	ODERA AKANGO	To provide	3,112,500.00
20.	EASA	To provide	1,918,800.00
21.	Law	To provide	11,923,635.00
22.	STHEM	To provide	18,508,517.25
			269,882,965.71

Appendix V: Bank Accounts Mpesa Paybill Accounts Which Are Not Active

SNo	Bank Name	Name of Account	Account No	STATUS
1.	Cooperative	Odero Akang'ó Campus	1134517252500	Not Active
2.	KCB	Moi University Evening Studies Pro.	1102488690	Not Active
3.	KCB	Moi University Endowment Fund	1101692235	Not Active
4.	KCB	Kitale Campus	1114591114	Not Active
5.	M-Pesa	MU Accommodation Fees	883181	Not Active
6.	M-Pesa	MU GSSP Fees	883182	Not Active
7.	M-Pesa	MU PSSP Fees	883185	Not Active
8.	National Bank	Moi University Bookshop	1021027998900	Not Active
9.	National Bank	Moi University Elimu Millers (S)	1282098111000	Not Active
10.	National Bank	Moi University Elimu Millers '(C)	1020098111000	Not Active
11.	National Bank	MU School of Education	1020112084500	Not Active
12.	National Bank	MU School of Business & Economics	1020112085700	Not Active
13.	National Bank	MU School of Human Resource Development	1020112084900	Not Active
14.	National Bank	MU School of Arts & Social Sciences	1020112084700	Not Active
15.	National Bank	MU School of Information Sciences	1020112085000	Not Active
16.	National Bank	MU School of Law	1020112084300	Not Active
17.	National Bank	MU School of Tourism, Hospitality & Events Management	1020112084800	Not Active
18.	National Bank	MU School of Aerospace Sciences	1020112085200	Not Active
19.	National Bank	MU School of Engineering	1020112085300	Not Active
20.	National Bank	MU School of Biological and Physical Sciences	1020112084600	Not Active
21.	National Bank	MU School of Agriculture & Natural Resources	1020112084400	Not Active
22.	National Bank	MU School of Public Health	1020112087700	Not Active
23.	National Bank	MU School of Medicine	1020112085900	Not Active
24.	National Bank	Moi University PSSP Payment Account	1020062992200	Not Active
25.	National Bank	MU School of Dentistry	1020112086300	Not Active
26.	National Bank	MU School of Nursing	1020112066100	Not Active

Appendix VI: Summary of Unpaid Contract Staff Wages

SNo	Month	Amount
1.	July	12,289,201.33
2.	August	10,944,579.23
3.	September	12,204,150.00
4.	October	12,698,474.42
		48,136,404.98