INDEPENDENT AUDITORS' REPORTS AS REQUIRED BY THE UNIFORM GUIDANCE AND GOVERNMENT AUDITING STANDARDS AND RELATED INFORMATION

JUNE 30, 2019

Independent Auditors' Reports as Required by the Uniform Guidance and Government Auditing Standards and Related Information

June 30, 2019

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INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE

To the Board of Trustees of Salem State University Salem, Massachusetts

Report on Compliance for Each Major Federal Program

We have audited Salem State University's (the "University") compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the University's major federal programs for the year ended June 30, 2019. The University's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditors' Responsibility

Our responsibility is to express an opinion on compliance for each of the University's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (the "Uniform Guidance"). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the University's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the University's compliance.

Opinion on Each Major Federal Program

In our opinion, the University complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2019.

Other Matters

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as Finding 2019-001 through 2019-002. Our opinion on each major federal program is not modified with respect to these matters.

The University's responses to the noncompliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. The University's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

Report on Internal Control over Compliance

Management of the University is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the University's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the University's internal control over compliance.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency of a federal program will not be prevented is a deficiency, or a combination of deficiencies, in internal control over compliance is a deficiency of a federal program with a type of compliance program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Schedule of Expenditures of Federal Awards

We have audited the financial statements of the University, as of and for the year ended June 30, 2019. We issued our report thereon dated October 10, 2019, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

O'(onnor + Drew, P.C.

Certified Public Accountants Braintree, Massachusetts

October 10, 2019



INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

To the Board of Trustees of Salem State University Salem, Massachusetts

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States, the financial statements of Salem State University (the "University"), which comprise the statements of net position as of June 30, 2019, the related statements of revenues, expenses and changes in net position, cash flows, the combining statements of net position of major component units, and combining statements of revenues and expenses of major component units for the year then ended, and the related notes to the financial statements, which collectively comprise Salem State University 's basic financial statements and have issued our report thereon dated October 10, 2019.

Internal Control Over Financial Reporting

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

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

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

Compliance and Other Matters

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

Purpose of this Report

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

O'(onnor + Drew, P.C.

Certified Public Accountants Braintree, Massachusetts

October 10, 2019

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

SALEM STATE UNIVERSITY

(an agency of the Commonwealth of Massachusetts)

Schedule of Expenditures of Federal Awards

Year Ended June 30, 2019

	CFDA Number	Pass-Through Entity	Pass-Through Entity Award Number	Federal Expenditures	Passed Through to Subrecipients
STUDENT FINANCIAL ASSISTANCE CLUSTER					
U.S. Department of Education:					
Direct Awards:					
Federal Supplemental Educational Opportunity Grant	84.007	N/A	N/A	\$ 408,263	\$ -
Federal Work-Study Program	84.033	N/A	N/A	352,504	-
Federal Perkins Loan Program (beginning of year)	84.038	N/A	N/A	1,363,700	-
Federal Perkins Loan Program (current year expenditure)	84.038	N/A	N/A	-	-
Federal Pell Grant Program	84.063	N/A	N/A	12,320,749	-
Federal Direct Student Loans	84.268	N/A	N/A	46,313,343	-
Teachers Education Assistance for College Grant	84.379	N/A	N/A	10,785	-
Nursing Student Loans (beginning of year)	93.364	N/A	N/A	589,093	-
Nursing Student Loans (current year expenditures)	93.364	N/A	N/A	143,500	
Total Student Financial Assistance Cluster				61,501,937	
TRIO CLUSTER					
U.S. Department of Education:					
Direct Awards:					
Student Support Services	84.042	N/A	N/A	510,015	-
Upward Bound	84.047	N/A	N/A	296,322	
Total TRIO Cluster				806,337	

See accompanying notes to the schedule of expenditures of federal awards.

Schedule of Expenditures of Federal Awards - Continued

Year Ended June 30, 2019

	CFDA Number	Pass-Through Entity	Pass-Through Entity Award Number	Federal Expenditures	Passed Through to Subrecipients
RESEARCH AND DEVELOPMENT CLUSTER National Science Foundation: Direct Awards: Agricultural Research Geosciences Learning of Physics and Programing	47.076 47.050 47.076	N/A N/A	N/A N/A	11,752 21,914 24,267	-
Subtotal - Direct Awards U.S. Department of the Interior Direct Awards: Organization of American Historians Subtotal - Direct Awards	15.946	N/A	N/A	<u> 15,260 15,260 15,260 15,260 </u>	
U.S. Department of Health and Human Services Direct Awards: Phonological Research Subtotal - Direct Awards Total Research and Development Cluster	93.173	N/A	N/A	<u>43,100</u> 43,100 <u>116,293</u>	
NON-CLUSTER U.S. Small Business Administration Pass-through Awards: Small Business Development Center Subtotal - Pass-through Awards	59.037 U	Jniversity of Massachusett	s N/A	<u> 292,006 </u> 292,006	<u>-</u>

See accompanying notes to the schedule of expenditures of federal awards.

Schedule of Expenditures of Federal Awards - Continued

Year Ended June 30, 2019

	CFDA Number	Pass-Through Entity	Pass-Through Entity Award Number	Federal Expenditures	Passed Through to Subrecipients
National Oceanic and Atmospheric Administration Direct Awards:					
Center for Sponsored Coastal Ocean Research Subtotal - Direct Awards	11.478	N/A	N/A	<u>29,007</u> 29,007	<u> </u>
National Endowment for the Humanities: Direct Awards: Promotion of the Humanities Federal/State Partnership Subtotal - Direct Awards	45.129	N/A	N/A	<u>29,412</u> 29,412	<u>-</u>
U.S. Department of Justice: Direct Awards: Violence Against Women Subtotal - Direct Awards	16.525	N/A	N/A	<u></u>	
Total Non-Cluster Total Federal Funds				418,497	2

See accompanying notes to the schedule of expenditures of federal awards.

Notes to the Schedule of Expenditures of Federal Awards

Year Ended June 30, 2019

Note 1 - Basis of Presentation

The accompanying Schedule of Expenditures of Federal Awards (the "Schedule") includes the federal award activity of Salem State University (the "University") under programs of the Federal Government for the year ended June 30, 2019. The information on this Schedule is prepared in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("Uniform Guidance"). Because the Schedule presents only a selected portion of the operations of the University, it is not intended to and does not present the financial position, changes in net position or cash flows of the University.

Note 2 - Summary of Significant Accounting Policies

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance.

Note 3 - Indirect Cost Rate

The University has elected to not use the 10-percent de minimis cost rate allowed under the Uniform Guidance.

Note 4 - Federal Student Loan Programs

Perkins Loan Program

The Federal Perkins Loan Program ("Perkins") is administered directly by the University and balances and transactions relating to this program are included in the University's basic financial statements. During the year ended June 30, 2019 there were no loans advanced under the Perkins program and no administrative costs were incurred. As of June 30, 2019, loan balances receivable, under Perkins was \$1,202,153.

There was no federal capital contribution or match by the University during the current year.

Nursing Student Loans

The Nursing Student Loan Program is administered by Salem State University. Fiscal year 2019 activity included loan funs disbursed of \$143,500. As of June 30, 2019, the loan balances receivable for this program was \$660,838.

Notes to the Schedule of Expenditures of Federal Awards

Year Ended June 30, 2019

Note 4 - Federal Student Loan Programs - Continued

Direct Student Loan Program

The University disbursed \$46,313,343 of loans under the Federal Direct Student Loans program, which include Stafford Subsidized and Unsubsidized Loans and Parent Plus Loans. It is not practical to determine the balances of the loans outstanding to students of the University under the program as of June 30, 2019. The University is only responsible for the performance of certain administrative duties and, accordingly, these loans are not included in the University's financial statements.

Schedule of Findings and Questioned Costs

Year Ended June 30, 2019

Section I – Summary of Auditors' Results:

Financial Statements

Type of auditors' report issued:	Unm	odified		
Internal control over financial reporting:				
• Material weaknesses identified?		yes	X	no
• Significant deficiencies identified that are not considered to be material weaknesses?		_ yes	X	no
Noncompliance material to the financial statements noted?		_ yes	X	no
Federal Awards				
Type of auditors' report issued on compliance for major programs:	Unmodified			
Internal control over major programs:				
• Material weaknesses identified?		yes	X	no
• Significant deficiencies identified that are not considered to be material weaknesses?		_ yes	X	_ no
Any audit findings disclosed that are required to be reported in accordance with the Uniform Guidance?		yes		no

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2019

Identification of Major Programs

Name of Federal Program or Cluster	CFDA Number
Student Financial Assistance Cluster Federal Supplemental Educational Opportunity Grant Program Federal Work-Study Program	84.007 84.033
Federal Perkins Loan Program Federal Pell Grant Program	84.038 84.063
Federal Direct Student Loans Teachers Education Assistance for College Grant Nursing Student Loans	84.268 84.379 93.364
Dollar threshold used to distinguish between type A and type B programs: \$75	0,000

<u>x</u> yes ___ no

Auditee qualified as a low-risk auditee?

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2019

Section II – Financial Statement Findings:

None

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2019

Section III – Federal Award Findings and Questioned Costs:

Finding number:	2019-001
Federal agency:	U.S. Department of Education
Programs:	Student Financial Assistance Cluster
CFDA #'s:	84.063
Award year:	2019

Criteria

According to 34 C.F.R. Section 668.22(j)(1):

An institution must return the amount of Title IV funds from which it is responsible as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew.

Condition

Federal regulations state that any unearned Title IV grant or loan assistance received by a student must be refunded to the Title IV programs upon a student's withdrawal from the institution. The academic institution is responsible for the calculation of the earned and unearned portion of Title IV assistance using a standard Return of Title IV Funds form ("R2T4"). In our testing sample of twenty-five students who were determined to have withdrawn from the University, we noted two students for whom funds were not returned within the required 45 days. Our audit disclosed that the funds were not returned until 35 and 40 days after the 45-day disbursement timeframe. The total amount to return was \$6,011.

Cause

During the Spring 2019 semester the University discovered the academic calendar set-up within the software used to calculate the earned portion of federal aid for withdrawn students was using an incorrect number of days for spring break. The University corrected this error within its system and proceeded to review all previously completed R2T4 forms in order to return the correct aid within the 45-day limit. During this time the two students above were incorrectly marked as completed and the error was not realized by the school until the 45-day disbursement timeframe has passed.

Effect

The University did not complete the R2T4 Form or return the unearned portion of aid within the established time frame.

Questioned Costs

None - Funds have been returned.

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2019

Perspective

Our sample was not, and was not intended to be, statistically valid. Of twenty-five students selected for testing, aid for two students (8%) was not returned within the required 45 days.

Identification as a Repeat Finding, if applicable

See finding 2018-001 included in Management's Summary Schedule of Prior Audit Findings.

Recommendation

The University should review their current procedures to ensure students who withdraw from the University have the appropriate Title IV aid returned within the established timeframe described above.

Views of Responsible Officials and Implementation Dates

The University agrees with this finding. The financial aid office is now using a two-step review to verify accuracy in all calendar functions. The first review is performed between financial aid and registrar during annual system set up and the second review is performed by R2T4 staff at the start of each term. The first review for 2019-20 academic year was completed upon discovery of the error noted in this finding and the second review task was performed prior to the start of the Fall 2019 term. These steps will be repeated prior to each term moving forward.

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2019

Finding number:	2019-002
Federal agency:	U.S. Department of Education
Programs:	Student Financial Assistance Cluster
CFDA #'s:	84.268
Award year:	2019

Criteria

According to 34 CFR 668.164(l):

- (1) Notwithstanding any State law (such as a law that allows funds to escheat to the State), an institution must return to the Secretary any title IV, Higher Education Act ("HEA") program funds, except Federal Work Study ("FWS") program funds, that it attempts to disburse directly to a student or parent that are not received by the student or parent. For FWS program funds, the institution is required to return only the Federal portion of the payroll disbursement.
- (2) If an EFT to a student's or parent's financial account is rejected, or a check to a student or parent is returned, the institution may make additional attempts to disburse the funds, provided that those attempts are made not later than 45 days after the EFT was rejected or the check returned. In cases where the institution does not make another attempt, the funds must be returned to the Secretary before the end of this 45-day period.
- (3) If a check sent to a student or parent is not returned to the institution but is not cashed, the institution must return the funds to the Secretary no later than 240 days after the date it issued the check.

Condition

Federal regulations require an institution to return unclaimed Title IV funds issued by check or EFT within 240 days. During our testing, we noted 1 student, out of a sample of 10, that had unclaimed funds exceeding the federal day limit.

Cause

During the audit it was noted this student's outstanding refund check had been omitted from the outstanding listing of outstanding Federal refund checks the University had been monitoring for aging.

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2019

Effect

The University did not return Title IV unclaimed funds to the Department of Education within the required 240-day time frame.

Questioned Costs

There was 1 outstanding check totaled \$1,671, which pertained specifically to federal-sourced funds.

Perspective

Our sample was not, and was not intended to be, statistically valid. Of the 10 students selected for testing, 1 student, or 10% of our sample, had unclaimed funds pertaining to federal sources that were not returned to the Department of Education within the 240-day required time frame.

Identification as a Repeat Finding, if applicable

Not applicable

Recommendation

The University should examine its policies and procedures related to unclaimed funds including the process and time frame for identifying aged balances and the process for cancelling checks and returning funds to the Department of Education.

Views of Responsible Officials and Implementation Dates

The University agrees with this finding and has returned these funds. The University has reviewed and revised its policies and procedures related to unclaimed funds.



Year Ended June 30, 2019

Finding number: Federal agency: Programs: CFDA #'s: Award year: 2018-001 U.S. Department of Education Student Financial Assistance Cluster Multiple 2018

Condition

Federal regulations state that any unearned Title IV grant or loan assistance received by a student must be refunded to the Title IV programs upon a student's withdrawal from the institution. The academic institution is responsible for the calculation of the earned and unearned portion of Title IV assistance using a standard Return of Title IV Funds form ("R2T4"). In our testing sample of 14 students who were determined to have withdrawn from the University, we noted one student for whom funds were not returned within the required 45 days. Our audit disclosed that the funds were not returned until 85 days after the 45-day disbursement timeframe. The total amount to return was \$851.

Current Year Status

As noted in finding 2019-001 there was one student whose aid was not returned within the established timeframe.



Year Ended June 30, 2019

Finding number: Federal agency: Programs: CFDA #'s: Award year: 2018-002 U.S. Department of Education Student Financial Assistance Cluster 84.063 2018

Condition

Federal regulations state that a school must designate a capable individual as the coordinating official whose responsibilities include, but are not limited to, resolving discrepancies between conflicting information received by offices within the institution. Our testing of forty students with enrollment status changes noted one instance where the withdrawal date reported to the National Student Loan Data System ("NSLDS") was inconsistent with the withdrawal date used by the University in the Return of Title IV Funds form ("R2T4") calculation.

Current Year Status

Corrective action was taken during the year.



Year Ended June 30, 2019

Finding number: Federal agency: Programs: CFDA #'s: Award year: 2018-003 U.S. Department of Education Student Financial Assistance Cluster 84.063 2018

Condition

The Financial Aid Office is responsible for completing the Return of Title IV calculation to determine how much Title IV aid the student earned and how much the University must return to the Department of Education. Once the Return of Title IV calculation is completed, the University is responsible for adjusting the student's billing statement and returning unearned Title IV funds through the U.S. Department of Education's Grant Management System ("G5"). The University has 45 days from the date they determined the student withdrew to return any unearned portions of Title IV funds. During our testing of fourteen students we noted one student where the aid returned was different than the amount correctly calculated on the R2T4. The actual amount of aid returned was \$1,610 whereas the correct amount of aid that should have been returned was \$1,645.76. The University corrected this error in August 2018.

Current Year Status

Corrective action was taken during the year.



Year Ended June 30, 2019

Finding number: Federal agency: Programs: CFDA #'s: Award year: 2018-004 U.S. Department of Education Trio Cluster 84.042 2018

Condition

The Student Support Services ("SSS") department at the University is responsible for compiling the necessary information required to complete the annual performance report ("APR"), as well as preparing and filing the APR. During our testing of thirty SSS students we noted one instance where an individual was included as a continuing participant for the academic year after they had graduated from the University.

Current Year Status

Corrective action was taken during the year.



Management's Corrective Action Plan

Year Ended June 30, 2019

Finding number: Federal agency: Programs: CFDA #'s: Award year: 2019-001 U.S. Department of Education Student Financial Assistance Cluster 84.063 2019

Corrective Action

As a result of this issue, the financial aid office is now using a two-step review process to verify accuracy in all calendar functions. The first review is performed between financial aid and registrar during the annual system set up and the second review is performed by R2T4 staff at the start of each term. The first review for 2019-20 award year was completed upon discovery of calendar issue noted in finding 2019-001. The second review, performed by staff who complete the R2T4 calculations, was completed prior to the start of the Fall 2019 semester and will be repeated prior to each term moving forward.

Timeline for Implementation of Corrective Action Plan:

Corrective action was taken during the year.

Contact Person: Bonnie Galinski Associate Vice President



Management's Corrective Action Plan

Year Ended June 30, 2019

Finding number: Federal agency: Programs: CFDA #'s: Award year: 2019-002 U.S. Department of Education Student Financial Assistance Cluster 84.268 2013

Corrective Action

As a result of this finding the University has revised its procedures to ensure all outstanding Federal refund checks are included on the report used to monitor outstanding Federal Aid refunds to ensure they are properly handled within the established timeframes.

Timeline for Implementation of Corrective Action Plan:

Corrective action was taken during the year.

Contact Person: Bonnie Galinski Associate Vice President

Russell J. Bethoney University Controller