#### STATE OF NORTH CAROLINA

OFFICE OF THE STATE AUDITOR BETH A. WOOD, CPA







#### **BRUNSWICK COMMUNITY COLLEGE**

BOLIVIA, NORTH CAROLINA
STATEWIDE FEDERAL COMPLIANCE AUDIT PROCEDURES
FOR THE YEAR ENDED JUNE 30, 2017





#### STATE OF NORTH CAROLINA

#### Office of the State Auditor



2 S. Salisbury Street 20601 Mail Service Center Raleigh, NC 27699-0600 Telephone: (919) 807-7500 Fax: (919) 807-7647 http://www.ncauditor.net

#### **AUDITOR'S TRANSMITTAL**

The Honorable Roy Cooper, Governor Members of the North Carolina General Assembly Board of Trustees Dr. Susanne H. Adams, President Brunswick Community College

As part of our audit of the State of North Carolina's compliance with requirements applicable to its major federal programs, we have completed certain audit procedures at Brunswick Community College for the year ended June 30, 2017. We conducted our audit in accordance with the 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 (Uniform Guidance). Our audit was performed by authority of Article 5A of Chapter 147 of the North Carolina General Statutes.

Our audit objective was to render an opinion on the State of North Carolina's major federal programs and not the College's administration of major federal programs. However, the report included herein is in relation to our audit scope at the College and not to the State of North Carolina as a whole. The State Auditor expresses an opinion on the State's compliance with requirements applicable to its major federal programs in the State's *Single Audit Report*.

The audit finding in this report is also evaluated to determine its impact on the State's internal control and the State's compliance with rules, regulations, contracts and grants. If determined necessary in accordance with *Government Auditing Standards*, this finding is reported in the State's *Single Audit Report*.

North Carolina General Statutes require the State Auditor to make audit reports available to the public. Copies of audit reports issued by the Office of the State Auditor may be obtained through one of the options listed in the back of this report.

Beth A. Wood, CPA State Auditor

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Beth A. Wood, CPA State Auditor

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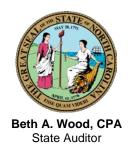
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## INDEPENDENT AUDITOR'S REPORT

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### INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE

Board of Trustees and Management of Brunswick Community College

#### Report on Compliance for Each Major Federal Program

As part of our audit of the State of North Carolina's compliance with the types of requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of its major programs for the year ended June 30, 2017, we have performed audit procedures at Brunswick Community College. Our report on the State of North Carolina's compliance with requirements that could have a direct and material effect on each major program and on internal control over compliance in accordance with Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance) is included in the State's *Single Audit Report*. Our federal compliance audit scope at Brunswick Community College included the Student Financial Assistance Cluster.

The audit results described below are in relation to our audit scope at the College and not to the State of North Carolina as a whole.

#### Management's Responsibility

Management is responsible for compliance with federal statutes, regulation, and the terms and conditions of its federal awards applicable to its federal programs.

#### Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the State of North Carolina's major federal programs based on our audit of the types of compliance requirements referred to above, which we issue in the State's *Single Audit Report*. 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* (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 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. However, our audit does not provide a legal determination of the College's compliance with those requirements.

#### Opinion on Each Major Federal Program

As stated above, our opinion on compliance for each of the State of North Carolina's major federal programs is included in the State's *Single Audit Report*.

#### Other Matters

The results of our audit procedures at Brunswick Community College disclosed an instance of noncompliance that is required to be reported in accordance with the Uniform Guidance and which is described in the Findings, Recommendations, and Responses section of this report.

#### Report on Internal Control Over Compliance

Management 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 internal control over compliance with the types of requirements that could have a direct and material effect on a 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 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, or combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal 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 the 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, and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, we consider the deficiency described in the Findings,

Recommendations, and Responses section of this report to be a material weakness in internal control over compliance.

#### Brunswick Community College's Response to Finding

The College's response to the finding identified in our audit is included in the Findings, Recommendations, and Responses section of this report. The College's response was not subjected to the auditing procedures applied in the audit of compliance, and accordingly, we express no opinion on the response.

#### Purpose of Report on Internal Control Over Compliance

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.

Beth A. Wood, CPA State Auditor

Raleigh, North Carolina

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March 19, 2018



# FINDINGS, RECOMMENDATIONS, AND RESPONSES

#### Matters Related to Federal Compliance Audit Objectives

**ENROLLMENT STATUS REPORTING ERRORS** 

The College did not timely report enrollment status changes to the National Student Loan Data System (NSLDS) for students who received federal financial assistance. During the audit period, the College disbursed approximately \$2.2 million in federal financial assistance funding to 670 students subject to this reporting requirement.

Auditors tested the enrollment status reporting for a sample of 120 students who received federal financial assistance and whose enrollment status changed. Forty-two (35%) students were not reported in accordance with federal compliance requirements. Specifically:

- 33 (28%) students were reported between 76 and 197 days after the status change occurred.
- 7 (6%) students status' were incorrectly reported.
- 2 (1%) students were reported more than 75 days after the status change occurred and had an incorrect status reported.

Failure to report student enrollment status changes to the NSLDS could impact student Pell eligibility.

The College relied on the National Student Clearinghouse (NSC), a third-party service provider, to ensure accurate and timely reporting of enrollment status changes. The College did not monitor the information reported to NSLDS to ensure its agreement with College records.

Federal regulations<sup>1</sup> require the College to notify NSLDS within 75<sup>2</sup> days of a change in student status for those students that received Pell Grant funds. In addition, the NSLDS Enrollment Reporting Guide states that the College is ultimately responsible for timely and accurate reporting.

Federal Award Information: Award Year July 1, 2016 – June 30, 2017. Federal Pell CFDA 84.063.

Recommendation: College management should monitor the student enrollment data reported to NSLDS for accuracy and timeliness.

Agency Response: See page 5 for Brunswick Community College's response to this finding.

<sup>&</sup>lt;sup>1</sup> 34 CFR 690.83 and 34CFR 685.309

The College is required to notify the NSLDS when it discovers that a student who received loans or Pell grants is no longer enrolled at least half-time. Unless the College expects to complete its enrollment roster with the NSLDS within 60 days of the student's change in enrollment, the College must notify the lender or guarantee agency, via NSLDS within 30 days. The College has 15 days to turn around the roster file. Therefore, we have determined timeliness to be established as within 75 days.



November 29, 2017

Beth A. Wood Office of the State Auditor 2 S. Salisbury Street 20601 Mail Service Center Raleigh, NC 27699-0600

Dear Ms. Wood:

Brunswick Community College agrees with the findings and recommendation that the College needs to monitor the student enrollment data reported to National Student Loan Data System (NSLDS) for accuracy and timeliness.

Based on these findings, the College is strengthening its current procedures to provide timely review of reporting enrollment data.

- The Records & Enrollment Services Department will produce a local report to identify students whose enrollment status changes to less than half time. The report will be processed on a monthly basis as part of the National Student Clearinghouse (NSC) upload of enrollment statuses. The report will help staff verify that enrollment status changes are transmitted from the College to the NSC and then, in turn, to NSLDS.
- 2. The Records & Enrollment Services Department will promptly review and correct data flagged rejected/erroneous on the Error Resolution Web Report provided by NSC/NSLDS.
- The Records & Enrollment Services Department will review details of enrollment files to ensure appropriate end dates for program codes are reported.
- The Records & Enrollment Services Department will report graduates as soon as degree audits are complete and will continue reporting graduates until all graduate records are uploaded and confirmed received.

As an additional verification check, the Financial Aid Resource Department will compare the NSLDS information provided by the Enrollment & Records Department, to an internally produced withdraw report to confirm the information sent to the Clearing House reported all student records whose enrollment status changed. The Director of Financial Aid Resources will oversee periodic checks in NSLDS to verify that students are reported correctly.

We appreciate your assistance helping us through this audit process. Please contact us if you have any questions.

Sincerely.

Dr. Susanne Adams

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President

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