# NEVADA STATE COLLEGE NEPANTLA PROGRAM Internal Audit Report July 1, 2016 through June 30, 2017

#### **GENERAL OVERVIEW**

The Nevada State College (NSC) Nepantla Program is a competitive four-year program established to educate and empower first generation, under-served, and under-represented students of Clark County transition from high school into college. Nepantla provides students with opportunities for leadership, community service, and cultural awareness. By providing an academically and socially supportive environment, the program aids students in their pursuit toward long-term success.

The Nepantla Program has a director who oversees the program and progress of the student cohorts. The program is primarily funded through donations and had an operating budget of approximately \$350,000 with roughly \$155,000 budgeted toward student scholarships.

#### SCOPE OF AUDIT

The Internal Audit Department has completed a review of the NSC Nepantla Program for the period of July 1, 2016 through June 30, 2017.

Our review was conducted in accordance with the *International Standards for the*Professional Practice of Internal Auditing issued by the Institute of Internal Auditors, and included tests of the accounting records and other auditing procedures, as necessary. The tests included, but were not necessarily limited to these areas.

- Determining how the Nepantla Program is funded and whether expenditures made were in accordance with donor requests.
- 2. Reviewing the application and admission process to gain an understanding of how

- students are recruited and admitted into the program.
- 3. Testing expenditures for reasonableness, allowability, and adequate supporting documentation.
- 4. Reviewing scholarship disbursements to ensure recipients met the requirements and timely payments were being made to student accounts.

In our opinion, we can be reasonably assured that the NSC Nepantla Program is operating in a satisfactory manner. However, implementation of the following recommendations would further improve operations.

### **EXPENDITURES**

We reviewed 28 Nepantla Program expenditures for supporting documentation and approval, reasonableness, and compliance with established purchasing procedures. The following exceptions were noted.

- 1. On four occasions, we noted prohibited expenditures were made by the cardholder.
  - a. On one occasion, a personal item was purchased on the travel card while the employee was at a conference. The institution took the appropriate action and required the employee to pay back the funds, but the funds were credited to the incorrect account.
  - b. On one occasion, a membership was purchased without prior approval of the Program Administrator in accordance with policy.
  - c. On one occasion, a gratuity greater than 20 percent was left for meal charges.
  - d. On one occasion, we noted a bus pass was purchased for a student in the

    Nepantla Program on the procurement card (PCard). We additionally saw bus

    passes purchased on an invoice from the bookstore. The documentation

maintained by the purchaser did not reconcile to the amount of bus passes purchased. Additionally, this could inadvertently create an over awarding of financial aid if transportation costs are already included in aid and the Office of Financial Aid is not made aware of the purchase.

For item a, we recommend the credit be moved to the proper account.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place;

Funds have been credited to correct account.

How compliance and performance will be measured and documented for future audit, management and performance review.

The departmental will ensure that the proper account is being affected should this occur in the future.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted;

The Nepantla Director will be responsible for ensuring that appropriate project accounts are being charged and credited.

For items a-c, we recommend cardholder transactions be reviewed and monitored. If improper use is detected, training, disciplinary action, and/or repayment for improper purchases should be made back to the college in accordance with the cardholder agreement.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place

A total amount of \$1854.52 in expenditures was transferred to a college account supported by unrestricted sources. The Director of Nepantla has the approver role and will ensure that improper transactions are declined and that appropriate measures are taken.

The Director of Nepantla has reviewed the purchasing card approver responsibilities.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted;

The Director of Nepantla is responsible for the approval of departmental transactions.

For item d, we recommend a discussion with the Office of Financial Aid be held about purchasing bus passes for students in the program.

**Institution Response** 

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place

In regard to the purchasing of bus passes, new measures are in place as of summer 2017. The program now awards transportation scholarships through the Financial Aid office and works closely with Cashier's office and bookstore to award bus pass vouchers to students needing this type of support.

How compliance and performance will be measured and documented for future audit, management and performance review

Logs are kept in the Nepantla office with award information, awards can be verified with Financial Aid, Cashiers, and campus bookstore. Student awards are documented in student accounts.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted

The Nepantla Program Director

2. On seven occasions, we noted inconsistencies in the transaction log documentation description when compared to what was purchased on the receipt.

We recommend performing additional research to determine why there are inconsistencies in the documentation maintained as well as to ensure expenditures were made in accordance with donor wishes.

## **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place

Question costs were reviewed and a total amount of \$1854.52 in expenditures was transferred to a college account supported by unrestricted sources.

How compliance and performance will be measured and documented for future audit, management and performance review.

The Director of Nepantla will ensure that any cardholders in the department are fully trained and will diligently review the documentation to ensure that it adequately supports the transaction.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Director of Nepantla is responsible for ensuring that documentation supports the Pcard transaction

3. We noted the most recent NSC Procurement Card (PCard) User manual was revised in 2012. The manual is missing information represented in the NSHE Procedures and Guidelines Manual (PGM) – Purchasing Card Program Best Practices. The NSC PCard manual does not have a section describing the supervisor's responsibility for the review and approval of cardholder expenditures or information on the timing of when reviews need to be performed.

We recommend the NSC PCard manual be updated to include best practices noted in the NSHE PGM. We recommend the NSC PCard manual be reviewed at least annually to determine if any updates are deemed necessary.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place

NSC updated the manual to incorporate the NSHE Procedures and Guidelines Manual Purchasing Card Program Best Practices and the Workday Business Process by reference. The Workday Business Process includes supervisor approval of cardholder expenditures.

How compliance and performance will be measured and documented for future audit, management and performance review

NSC will update the PCard Manual at least annually. NSC will not postpone updating the manual when procedures are in development for new PCard activities, such as Travel Card and Workday.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Controller is responsible for reviewing and updating the PCard Manual.

4. When comparing the expenditures to a Memorandum of Understanding (MOU), we noted three transactions on a travel claim with purchases that would not fall under an allowable expenditure per the agreement. Additionally, we noted the program director has never seen the MOUs.

We recommend consideration be given to replenish the funds for the purchases related to the travel claim.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

A total amount of \$1854.52 in expenditures, which includes the travel, was transferred to a college account supported by unrestricted sources.

A copy of all fund agreements will be provided to the Director of Nepantla upon execution of the agreement. Any and all modifications will be provided upon execution as well. The Director of Nepantla will indicate receipt of the agreements to the Associate Vice President of Institutional Advancement. Future donor requests will include staff development.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Director of Nepantla will be responsible for ensuring that expenditures on Nepantla program donor funds conform with the intent of the donor.

We recommend the Foundation provide a copy of the MOUs to the program director to ensure the donated funds are spent in accordance with the agreement.

## **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place

Past MOUs that support Nepantla have been shared with the program director and leadership

How compliance and performance will be measured and documented for future audit, management and performance review.

A process has been created to ensure all new MOUs or Foundation Fund Agreements (FFA's) that support Nepantla will be shared with the program director and his/her manager.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Associate Vice President of Institutional Advancement is responsible for ensuring that those responsible for financial transactions on donor funds are provided copies of donor agreements that clearly indicate any restricted or budgeting uses.

- 5. We noted multiple exceptions related to the monthly PCard Statement of Account (SOA).
  - a. For twelve transactions, the cardholder did not sign the SOA in accordance with policy. In addition, we noted the statement was not approved by a supervisor. Instead, a note was written by the cardholder stating, "awaiting new supervisor signature," when there was a supervisor in place throughout the audit period.
  - b. For one transaction, the monthly SOA was generated before the end of the cycle period. This could inadvertently leave off transactions which occurred up to the cycle end date. Additionally, the SOA was not approved by a supervisor.
  - c. For one transaction, the monthly SOA was signed by the cardholder on time, but was not approved by a supervisor.
  - d. For three expenditures reviewed, the SOA was missing.

Due to the recent implementation of a new ERP system, for items a-d we recommend determining if monthly SOAs are still applicable. We recommend a timeline be developed on when transactions must be reconciled, reviewed and approved by the cardholder and supervisor.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place

The Workday Business Process includes the equivalent of an SOA. The cardholder and supervisor reviews and approves each purchase. The Workday Business Process includes a timeline.

Workday reports can measure and document compliance and performance. The Controller's Office will ensure that processing timelines are communicated to the campus community. The Controller's Office will use deficiency memoranda to communicated violations of any Pcard policy, including missing processing deadlines, to the cardholder and the cardholder's supervisor. Failure to comply will result in suspension or revocation of Pcard privileges.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Controller is responsible for the development, maintenance of and adherence to Pcard policies and procedures.

6. On one occasion, a receipt could not be provided and additional clarification on why the cardholder made the purchase could not be provided.

We recommend receipts and documentation that can serve as proof of the purchase be maintained in accordance with policy.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

Employee responsible for inconsistencies in the documentation no longer works for Nepantla or Nevada State College. The expense was included in the \$1854.52 that was

transferred to a college account supported by unrestricted sources. In order to avoid a similar situation in the future, all purchasing is now verified through Workday which requests a receipt for all purchases. Timely verification and document upload is streamlined and verification takes place through Controllers Office.

How compliance and performance will be measured and documented for future audit, management and performance review.

In spring 2018 all purchasing processes moved to Workday where P Card verification takes place through the Manger and Controllers Office.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Director of Nepantla is responsible for ensuring that all of the program's transactions are properly documented.

7. Nevada sales tax was paid on nine transactions.

We recommend employees be reminded that vendors should not charge sales tax on purchases. If the payment of sales tax cannot be avoided at the time a purchase is made or is not noticed until a later date, the employee should request a credit from the vendor and provide an explanation on the supporting documentation.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

The Controller's Office will send reminders to PCard holders that sales tax should not be included on college financial transactions, including PCard transactions.

How compliance and performance will be measured and documented for future audit, management and performance review.

Workday reports can measure and document compliance and performance.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Controller is responsible for proper procedural training of cardholders and for the removal of any improper sales tax charges.

#### ADDITIONAL COMPENSATION

When reviewing the Summer Bridge Program (SBP) expenditures, we noted salary payments on Letter of Appointments (LOAs) to employees who were already academic faculty at NSC. A written policy regarding additional compensation is still currently being developed;

therefore, we could not verify if the employees involved in the summer program would exceed the maximum amount they could earn in a fiscal year. When reviewing the SBP LOA payments and considering other compensation received (ex. non-SBP LOAs, overload pay, etc.) to the employee's contracted amounts, we noted for two individuals, the additional pay exceeded 30% of their contracted salary.

We recommend determining if the LOAs should be considered additional compensation.

If it is determined that this should be considered additional compensation, employees participating in the summer program should be reviewed against the finalized additional compensation policy.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

We anticipate having the Extra Contractual Compensation (ECC) Policy approved by the start of the summer semester. HR will be responsible for monitoring all ECC (including LOA's) for faculty. HR will notify the appropriate Dean and Provost of any faculty members that are nearing the limits of ECC so they can adjust as necessary or approve an exception.

How compliance and performance will be measured and documented for future audit, management and performance review.

Once the ECC is approved HR will be monitoring all faculty workload. HR will be able to provide reports of all ECC by faculty member. This will be provided when faculty are nearing the maximum allowed under the policy as well as at any time requested.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Director of Human Resources will be responsible for monitoring and providing information to the Deans and Provost's Office. The Provost is ultimately responsible for the ECC policy and adherence to the policy.

Additionally, we performed a comparison between stipulated contract rates to SBP rates paid. Since NSC is still formalizing the policy as noted above, we reviewed other NSHE institution policies to provide a benchmark of summer compensation standards. We noted summer compensation paid was comparable to stipulated contract rates. From the other NSHE institution policies reviewed, summer compensation rates are typically less per month than contracted rates. Finally, we noted a SBP administrator in an oversight role over faculty was teaching a course in addition to administrative responsibilities.

While the SBP is unique with additional responsibilities that other summer courses do not have, we recommend consideration be given to performing a review of the summer compensation rates paid to SBP faculty to ensure the pay is in line with the amount of hours faculty put in and that there are no conflicting roles.

#### **Institution Response**

The College agrees with this recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

NSC realizes that this is a unique situation given the uniqueness of the program. The Provost's Office will review and determine if there is any overlap in duties that are unreasonable. With the approval of the new ECC policy the compensation for the summer bridge director will be evaluated within the guidelines of the policy. The Provost's Office has also created a guideline for stipends that will be in place starting with the next academic year. Each stipend will be evaluated based on the new guide and adjusted as necessary.

How compliance and performance will be measured and documented for future audit, management and performance review.

With the implementation of both the ECC policy and the stipend guidelines NSC will evaluate the level of compensation and duties of the Summer Bridge Director. Due to the timing and with the summer bridge activities currently underway, the duties & stipend will be evaluated prior to the start of the 2019 summer bridge program.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Provost is responsible for approving faculty stipends and monitoring workload of faculty.

#### **SCHOLARSHIPS**

A sample of 30 Nepantla Program students who received funding from the program was reviewed for award eligibility, timeliness of disbursement, and award notification. The following exceptions were noted.

The Peer Mentor scholarship agreement states that if the student maintains a 3.25 GPA for
the Fall term, the student will be eligible for a \$1,000 Spring stipend. We noted for one
peer mentor, the student met the GPA requirements but was only awarded \$500.
 We recommend a determination be made on if the student met all peer mentor
requirements as outlined in the agreement. If the student met all requirements, a
determination should be made on awarding the additional funds.

#### **Institution Response**

The College agrees with the recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

The Program Director met with student and it became apparent that students had retaken one of the courses in which originally student had received a lower grade. Due to the re-take the GPA was raised, however at the time of the GPA check the student did not meet the 3.25 GPA requirement. Because the student did not earn a 3.25 for the Fall semester in which the peer mentor service took place no further action is needed as the student did not meet requirements set out in peer educator agreement.

How compliance and performance will be measured and documented for future audit, management and performance review.

Date of GPA check will be documented along award information.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted;

#### The Nepantla Program Director

2. When reviewing notifications for the Nepantla disbursements, we noted incorrect award types in the description box on the award letter. For thirteen award letters, we noted the award type listed as a Federal Direct Subsidized Loan (FDSL) instead of a Nepantla award. For twelve award letters, we noted the award listed as "NA" instead of a Nepantla award. Although the amounts were awarded correctly, this could be confusing to the student on what type of aid they are receiving.

We recommend the item type cross reference in award letters correctly reflect Nepantla as the award type.

#### **Institution Response**

The College agrees with this recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

In order for the financial aid office to award and authorize the disbursement of an award in PeopleSoft, there must first exist an item type under which the funds will be applied to the student's account. The creation of an item type is a multi-phased process that spans over multiple offices, including the Budget Office, Cashier's Office and Financial Aid. Once the Budget Office has set up the account from which funds will be debited, and the Cashier's Office has created the item type, the financial aid office has four additional areas to set up, including the Fiscal Item Type, the Financial Aid Item Type, the Item Type Disbursement Rules, and finally updating the 3C's Item Type Cross Reference Table with the item type name so that it correctly displays in the award letter. This final step, which must be done by the FA System Analyst, was not completed for the Nepantla item type before some award letters were generated, and therefore the item displayed incorrectly for those letters. The 3C's Item Type Cross Reference Table was eventually updated, which would ensure that subsequent award letters would contain the correct description. For those letters that incorrectly displayed Federal Direct Subsidized Loan (FDSL), this was caused by the re-use of an item type number for a different fund. This practice is discontinued.

When creating item types in the future, the FA System Analyst will ensure the 3C's Item Type Cross Reference Table is updated prior to generating award letters containing a new item type. The FA System Analyst will email the Director and Assistant Director of Financial Aid to document this has been completed.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted;

The FA System Analyst will be held accountable for repeat or similar observations.

#### **ADMINISTRATIVE ITEMS**

We reviewed the admissions process to understand how potential students are recruited and admitted into the program. We reviewed a sample of 20 applicants who fell within our audit period. The following administrative items were noted.

1. Although we noted the status of applications are housed within a system, applicant ratings by Nepantla staff are maintained by each staff member individually. Because of this, we were only able to review ratings for seven applicants. For eleven applicants, no rating could be provided and for two applicants, only a high school GPA was maintained on the rating spreadsheet. This made it difficult to know for certain what the final determination was on why the student was/was not accepted into the program.

We recommend staff ratings be compiled and maintained in a file for each summer recruitment. As the program continues to grow and more applicants qualify than can be accepted into the program, this would help to alleviate any possible situation where a student challenges why they were denied.

#### **Institution Response**

The College agrees with this recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

For admissions into the 18-19 Nepantla Program, all Nepantla staff members on board were asked to complete the Nepantla Admissions Selection Sheet individually. Selection sheet will be discussed during admissions process and records will be held for 5 years. In addition to the Nepantla Admissions Selection Sheet students will have an opportunity to interview in person with a faculty member and a current member of the Nepantla community. Interview materials will be held in student files for future reference. These measures are in place as of Spring 2018.

How compliance and performance will be measured and documented for future audit, management and performance review.

Compliance documents will be archived at the conclusion of every admissions cycle. Checking for individual: Nepantla Admissions Selection Sheet and interview materials.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Nepantla Program Director will be responsible for ensuring that all applicant review materials are well documented and maintained in an effective manner.

2. Nepantla Program participants sign a Success Contract to be part of the program. We noted seven contracts could not be provided.

We recommend Success Contracts be maintained in the student file.

#### **Institution Response**

The College agrees with this recommendation.

Detailed corrective action taken, including what will be done to avoid the identified issues in the future, and when these measures will be in place.

Success Contracts collected for the 18-19 admissions cycle will be scanned and digitally archived in addition to paper copies placed in student files. Measures are in place as of spring 2018.

Compliance and performance will be measured through an end of summer bridge audit process performed by the Program Coordinator and verified by the Program Director.

Who will be responsible and may be held accountable in the future if repeat or similar observations are noted.

The Nepantla Program Director will be responsible for ensuring that all Success Contracts are maintained in an effective manner.

# STATEMENT OF REVENUES AND EXPENDITURES

The statement of revenues and expenditures provided below is based on the activity of one self-supporting and three gift accounts assigned to the Nepantla Program. The revenue and expenditure information was obtained from the financial accounting system and is provided for informational purposes only.

	Self- Supporting Accounts	Gift Accounts	Total
Balance, July 1, 2016	\$ 3	\$ 38,332	\$ 38,335
Transfers-In	35,335		35,335
Revenues			
Gifts		356,079	356,079
Total Revenue		356,079	356,079
Transfers-Out			
Expenditures			
Salaries	35,337	170,378	205,715
Travel	-	2,847	2,847
General Operations	-	14,824	14,824
Scholarships		140,779	140,779
Total Expenditures	35,337	328,828	364,165
Balance, June 30, 2017	\$ 1	\$ 65,583	\$ 65,584

The Internal Audit Department appreciates the assistance and cooperation received from the NSC staff during this review.

Las Vegas, Nevada February 7, 2018

/----SIGNATURE ON FILE----/
Lauren Tripp
Internal Audit Manager

/----SIGNATURE ON FILE----/
Joseph Sunbury
Chief Internal Auditor



April 27, 2018

Mr. Joseph Sunbury Chief Internal Auditor Nevada System of Higher Education 4300 S. Maryland Parkway Las Vegas, NV 89119

RE: Nepantla Audit July 1, 2016 – June 30, 2017 – Nevada State College

Dear Mr. Sunbury,

Attached please find NSC's responses to the above referenced audit.

AUDIT: Nepantla Program

AUDIT PERIOD: July 1, 2016 - June 30, 2017

**NUMBER OF FINDINGS: 14** 

NUMBER OF RECOMMENDATIONS COMPLETELY IMPLEMENTED: 13

NBR.	RECOMMENDATION	AGREE	IMPLEMENTED
1.	Move credit for refund to proper account.	Yes	Yes
2	Review and monitor PCard transactions	Yes	Yes
3	Discuss bus passes for students in program with Office of Financial Aid	Yes	Yes
2.	Ensure expenditures are consistent with donor wishes.	Yes	Yes
3.	Update NSC PCard manual to include best practices in NSHE PGM	Yes	Yes
4.	Replenish funds for travel claim purchases not allowable per MOU agreement	Yes	Yes

5.	Provide MOU copies to budget managers/directors	Yes	Yes
6.	Determine whether monthly PCard SOAs are applicable. Develop timeline for reconciliation, review and appropriate approvals	Yes	Yes
7.	Maintain receipts and documentation for proof of purchase in accordance with policy	Yes	Yes
8.	Remind employees vendor should not charge sales tax.	Yes	Yes
9.	Determine SBP LOAs considered additional compensation then review by using compensation policy	Yes	ECC Policy is in final review with Faculty Senate (May 7, 2018)
10.	Review summer compensation rates paid to SBP faculty	Yes	Yes
11.	Determine whether student meets peer mentor requirements for additional funding	Yes	Yes
12.	Ensure award letter notification item type cross references correctly to reflect Nepantla	Yes	Yes
13.	Compile and maintain staff ratings for each summer recruitment in a file	Yes	Yes
14.	Maintain Success Contracts in student file	Yes	Yes

Thank you and your staff for your thorough review and continued assistance.

Sincerely,

VP Finance and Business Operations