





# APA Update April 28, 2025

David Rasnic, CPA, CISA Higher Education Programs Director

# **Objectives**

• Office Update

• HEI Findings

• Workplan 2026

# **Office Update**

- New Deputy Auditor of Public Accounts – Human Capital Management
  - Former Reporting and Standards Director
  - Project Manager of Radford, George Mason
  - VSCPA Accounting and Advisory Committee - Chair
  - NSAA Audit Standards and Committee



Zachary Borgerding Deputy Auditor of Public Accounts





Reporting and Standards Directors – Amy Stokes and DeAnn Compton



Procurement and Compliance Assurance Team – George Strudgeon



Recruiting for a Capital Asset Reporting Director



60% of time in-office or on-site in a work week

#### **Updates**

- NCAA AUPs
  - APA VCU, VT, UVA
  - Anticipate bidding out the remainder
- Reaccreditation Timelines
  - 10 Year Before On-Site Review
  - 5 Year Two Weeks before Due Date

#### **More Updates**

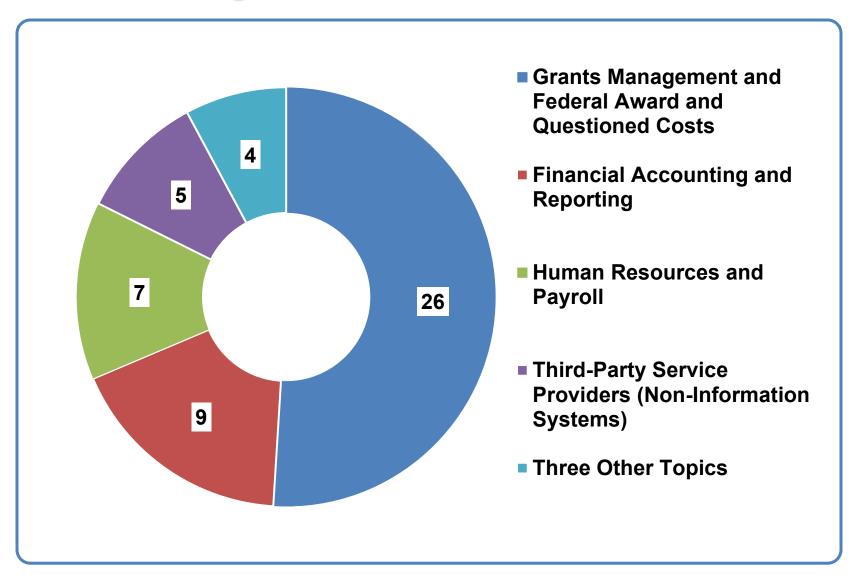
- Standalone Student Financial Aid Compliance Reports
  - To meet reaccreditation standards
- Focused on meeting BOV Deadlines
- New VCCS Approach
  - Internal Control Questionnaires

## **Discussion Question**

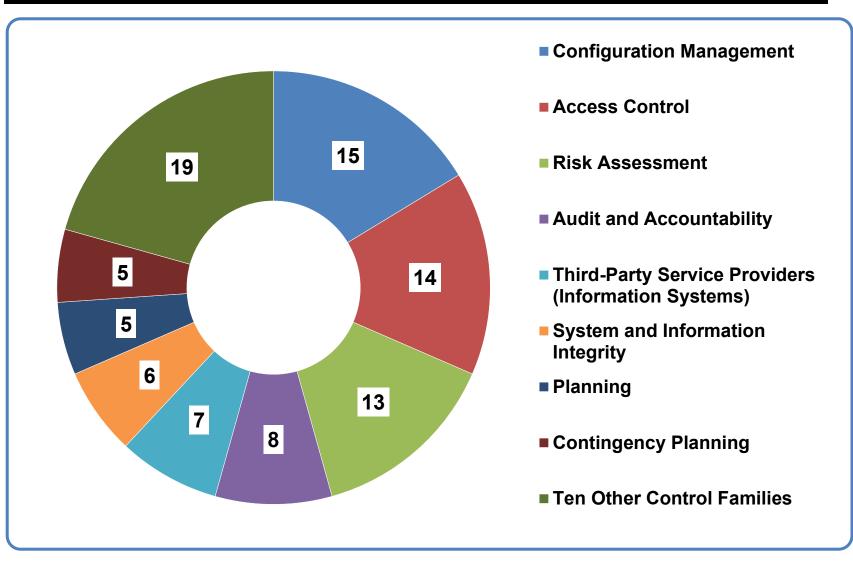
• What areas are most prone to control deficiencies in your experience?



#### **ACFR and Single Audit Results – Non-IT Issues**



#### **ACFR and SSA Results – IT Issues**

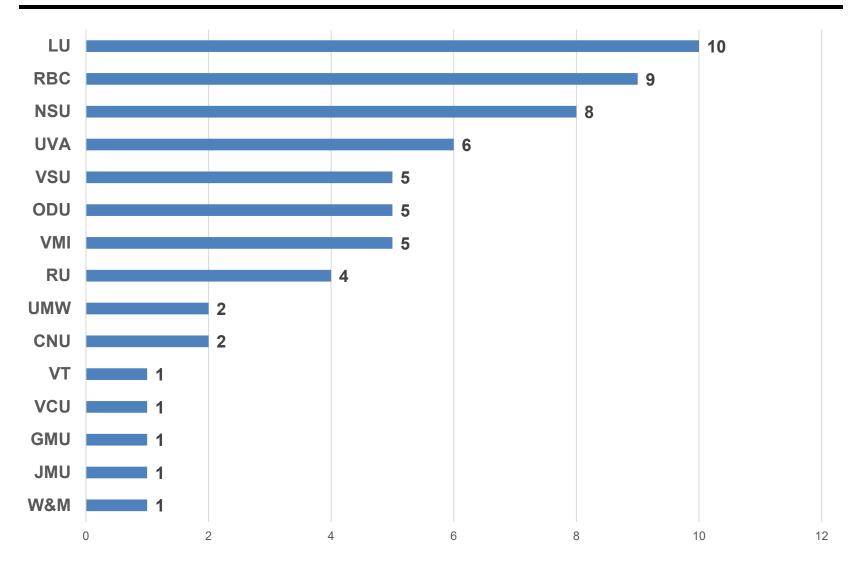


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# **Higher Education Financial Statement Audit Results**

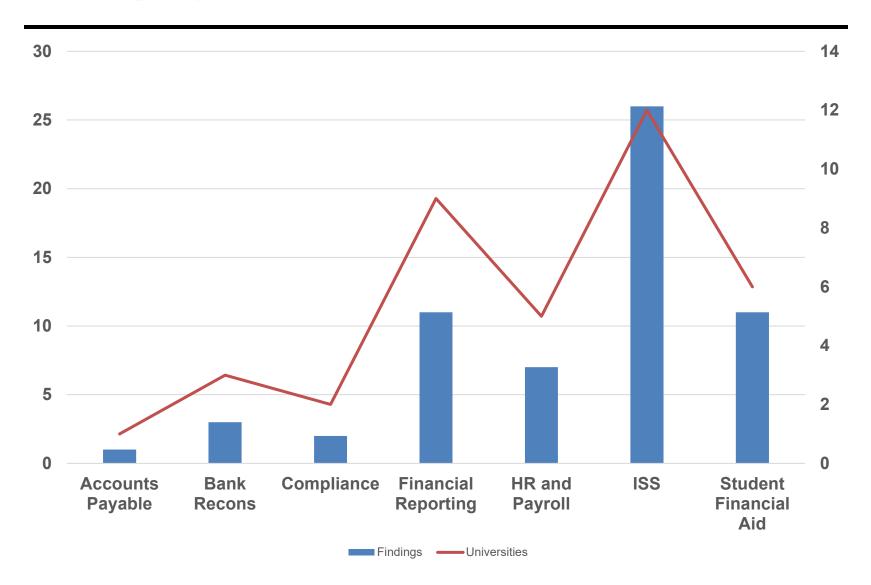
- 2024 audits for VCU, VT, UVA, and JMU
- 2023 audits of remaining institutions (excluding VCCS)
- Audited Student Financial Aid Single Audit
  - 30 findings at nine institutions
- 3 material weakness
- 61 significant deficiencies

# **Findings by HEI**



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# **Findings by Area and Number of HEIs**



## **Discussion Question**

• In your experience, what are the primary causes of your findings?



# **Financial Reporting**

• DOA Risk Alert

#### Financial Reporting Findings by Fiscal Year and Severity ACFR Audits

Table 1

|                        | 2024 | 2023 | 2022 | 2021 | 2020 |
|------------------------|------|------|------|------|------|
| Material Weakness      | 5    | 5    | 5    | 1    | 3    |
| Significant Deficiency | 1    | 1    | 1    | 2    | 2    |

#### Financial Reporting Findings by Fiscal Year and Severity Non-ACFR Audits

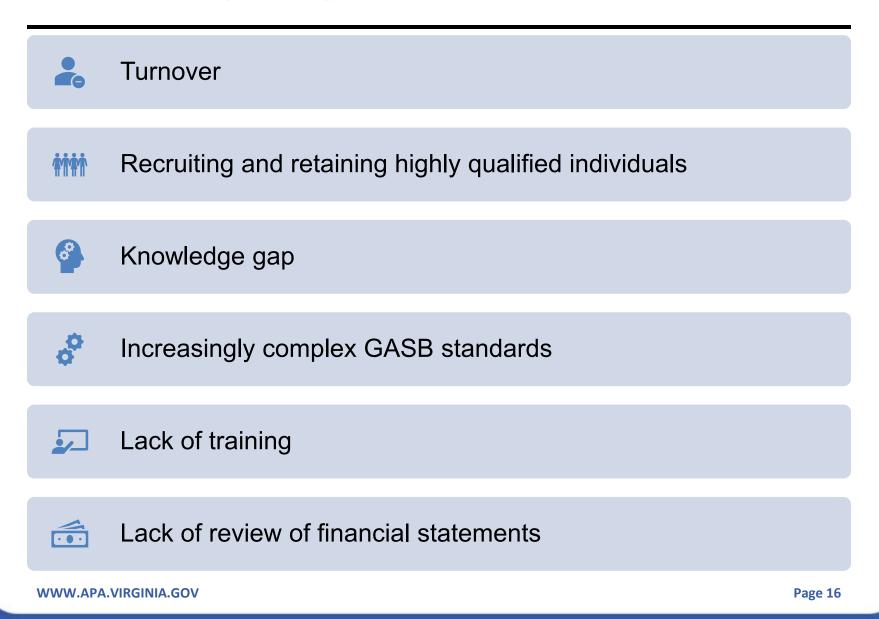
Table 2

|  | 2024 | 2023 | 2022 | 2021 | 2020 |
|--|------|------|------|------|------|
| Material Weakness  | *    | 4    | 3    | 1    | -    |
| Significant Deficiency   | *    | 6    | 2    | 2    | 1    |
| *Fiscal Year 2024 non-ACFR audits have not been performed as of the ACFR |      |      |      |      |      |
| Deadline (12/15/2024).   |      |      |      |      |      |

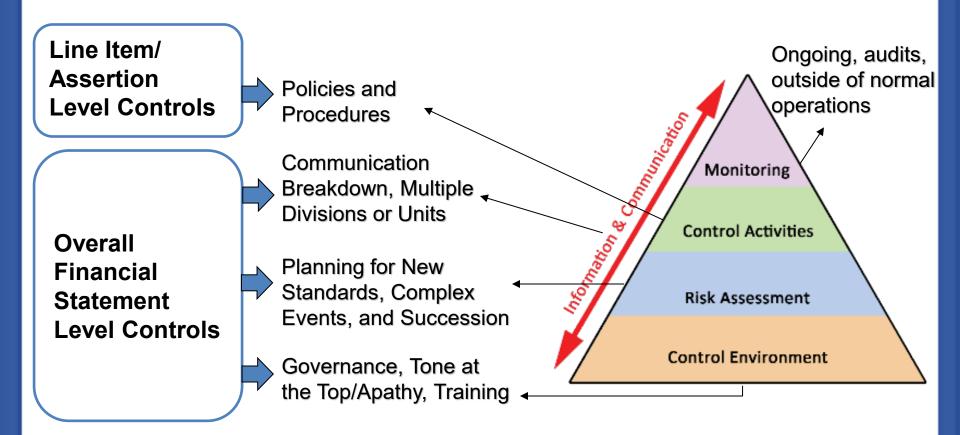
# **Financial Reporting Findings**

- Capital Asset issues present in 10 of 11 findings
  - Leases GASB 87
  - SBITAs GASB 96
  - Public Private Partnerships GASB 94
  - Aggregated Assets IG -2021-Question 5.1
- Unusual Activity or variances

# **Financial Reporting Causes**



# **Evaluating Risk with COSO**



# **Risks and Recommendations**

- Risk of Material Misstatement
  - Highest during year of implementation of new GASB standards or complex transactions
- Focus on Process
  - White Papers or Position Papers
- Prepare analytical reviews of financial statements

## **Statements and Guidance Effective FY25**

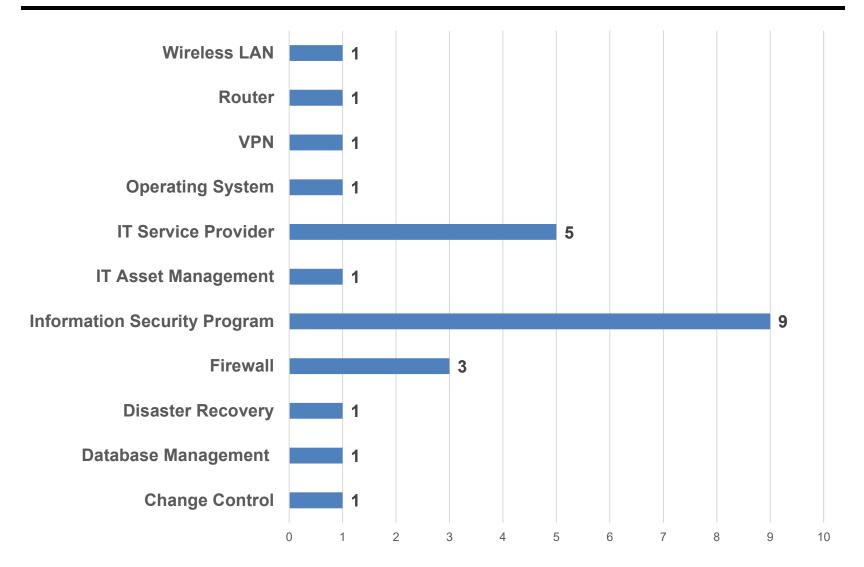
• NACUBO: Scholarship Allowance

• GASB 101: Compensated Absences

• GASB 102: Certain Risk Disclosures

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# **ISS Findings by Area**



# **ISS Findings**

- Information Security Program
  - Security Awareness Training
  - Disaster Recovery
  - Gramm-Leach-Bliley Act
  - Risk Assessments over sensitive systems

• Service Providers

• Firewall Security

# **HEI IT Findings**

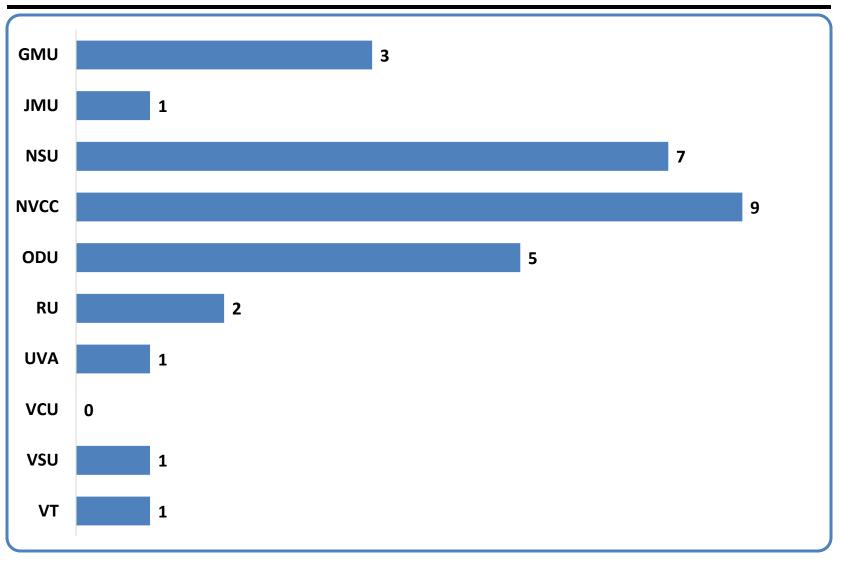
• User Access

Identity Access Management

 Controls for Active Directory

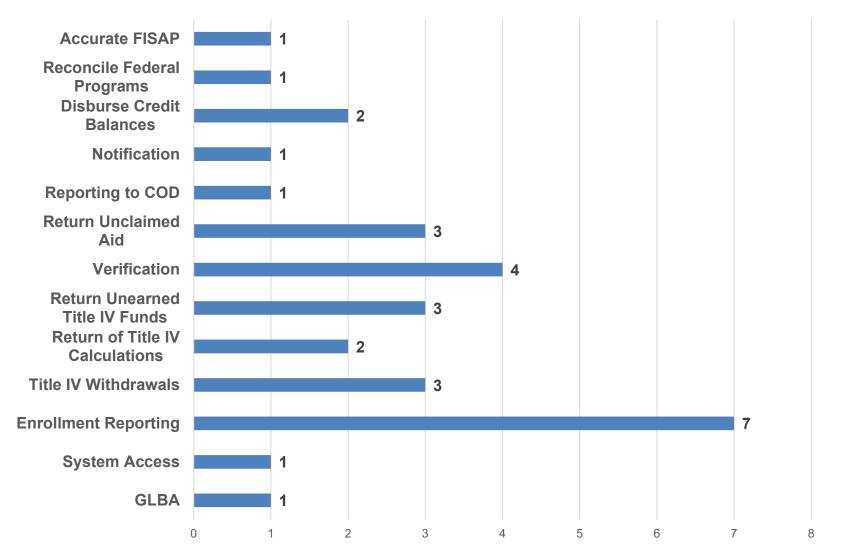
• Database Management

# **Student Financial Aid Major Program Findings FY24**



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### **SFA Findings by Area**



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# **Department of Education Top 10 Findings**

| Top Ten Domestic School Audit Findings by Number of Findings for Fiscal Year 2023 |                       |         |  |
|---|-----------------------|---------|--|
| Finding Code Description  | Number of<br>Findings | Percent |  |
| STUDENT STATUS - INACCURATE/UNTIMELY REPORTING                                    | 900                   | 16.5%   |  |
| REPEAT FINDING - FAILURE TO TAKE CORRECTIVE ACTION                                | 808                   | 14.8%   |  |
| RETURN TO TITLE IV (R2T4) CALCULATION ERRORS                                      | 501                   | 9.2%    |  |
| RETURN OF TITLE IV FUNDS MADE LATE  | 383                   | 7.0%    |  |
| STUDENT CREDIT BALANCE DEFICIENCIES   | 250                   | 4.6%    |  |
| QUALIFIED AUDITOR'S OPINION CITED IN AUDIT  | 204                   | 3.7%    |  |
| CARES ACT - HIGHER EDUCATION EMERGENCY RELIEF FUND (HEERF) NON-COMPLIANCE         | 201                   | 3.7%    |  |
| INACCURATE DISBURSEMENT DATES/AMOUNTS REPORTED TO COD                             | 194                   | 3.6%    |  |
| ENTRANCE/EXIT COUNSELING DEFICIENCIES   | 181                   | 3.3%    |  |
| PELLOVERPAYMENT/UNDERPAYMENT  | 166                   | 3.0%    |  |
| Total Top Ten Deficiencies  | 3,788                 | 69.5%   |  |
| Total 2023 Deficiencies   | 5,454                 | 100.0%  |  |

# **Risk and Causes**

- Noncompliance with Uniform Guidance
- Program Review
- Reaccreditation Warning Status

- Causes
  - Lack of Staff/Turnover
  - Management Oversight
  - Policies and Procedures
  - Batch/Coding Errors

### **Student Financial Aid Process**

- Performed every 3 years as major program
  - 10 HEI's selected based magnitude
  - Follow-up on findings each year based on DOA
     Status of Prior Year Findings
- Performed during 5-year and 10-year reaccreditation reviews

• Perkins Loan Liquidation Report

# **HR, Payroll and Compliance**

• Terminated Employees

• VNAV Reconciliations and Census Data

• Statement of Economic Interest



### **Capital Assets, Expenses and Payables**

• Prompt Pay

• Accruals

• Purchase Cards

# **Approach to Findings**

• Goal = Consistency

 Monthly Meetings with Project Manager and In-charges across all HEI

 Discuss exceptions, potential findings and adjustments

# **Common Findings and Adjustments**

# Any Questions?

### **Other Projects**

• NCAA Subsidy Report

• Comparative Report

# **Workplan Considerations**

- Fall 2025
  - William and Mary needing earlier audit for 10-year reaffirmation of accreditation
- Perkins Loan Liquidations
  - As necessary, but we appreciate as much advance notice as possible

# Proposed 2026 Work Plan

- Annual work plan = work performed primarily during fiscal year 2025
- ACFR, Single Audit of federal funds, and mandatory projects are major focus
- Use risk factors to determine the audit work to be performed with remaining resources

# Work Plan Comparison (hours)

| Proposed 2026 Work Plan | 150,645        |
|-------------------------|----------------|
| Prior Year Work Plan    | <u>144,645</u> |
| Increase                | 6,000          |

 Increases are primarily related to increases in the number of federal major programs

# **Total Hours by Function**

| Function                                | Hours   |  |
|---|---------|--|
| Special and Agency Projects:            |         |  |
| Special Projects                        | 810     |  |
| Executive Departments                   | 113,885 |  |
| Cycled Agencies                         | 6,700   |  |
| Independent Agencies                    | 14,055  |  |
| Judicial (Agencies, Clerks, and Courts) |         |  |
| and Local Governments                   | 14,175  |  |
| TOTAL 2023 WORK PLAN                    | 150,645 |  |

# **Hours by Executive Departments**

| Department                                | Hours            |  |
|---|------------------|--|
| Executive Offices and Administration      | 4.485            |  |
| Commerce and Trade                        | 1,500            |  |
| Education                                 | 2,880            |  |
| Education – Higher Education Institutions | 60,425           |  |
| Finance                                   | 22,705           |  |
| Health and Human Resources                | 13,250           |  |
| Natural and Historic Resources            | 150              |  |
| Public Safety and Homeland Security       | 1,110            |  |
| Transportation                            | 5,980            |  |
| Labor<br>www.apa.virginia.gov             | 1,750<br>Page 37 |  |

# Fall 2025 Project Manager/In-Charge Assignments

| Audit            | Project Manager                 | In-Charge          |
|------------------|---------------------------------|--------------------|
| UVA - Academic   | David Rasnic                    | Justin Rhodes      |
| UVA - Medical    | David Rasnic                    | Reann Chiappinelli |
| VCU              | Amy Stokes                      | Melinda Crawford   |
| VT               | Megan Richard                   | Noah Johnson       |
| SFA – Follow Up  | Jim Quesenberry<br>David Rasnic | Randall Johnson    |
| William and Mary | David Rasnic                    | Lindsey Millar     |

# Ask the Auditors Open Discussion



# **QUESTIONS?**

#### David Rasnic, CPA, CISA

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