

**REPORT ON AUDIT • FISCAL YEAR 2024** 

# Georgia State University Atlanta, Georgia

A Member Institution of the University System of Georgia



Greg S. Griffin | State Auditor

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# Audit Summary

We have audited the basic financial statements of the Georgia State University (University), a unit of the University System of Georgia, which is an organizational unit of the State of Georgia, as of and for the year ended June 30, 2024, and issued our report thereon, dated December 18, 2024. We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Our Independent Auditor's Report, included in the University's Annual Financial Report, is available on the Georgia Department of Audits and Accounts' website at <u>www.audits.ga.gov</u> and on the University's website at <u>www.gsu.edu.</u>

As part of our single audit of the State of Georgia (State) for the fiscal year ended June 30, 2024, we performed audit procedures at the University that we considered necessary to enable us to express our opinions and issue our reports for the statewide single audit in accordance with GAAS, Government Auditing Standards, and Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Our Report on Compliance for Each Major Federal Program, Report on Internal Control Over Compliance and Report on Schedule of Expenditures of Federal Awards required by the Uniform Guidance are included in the State's Single Audit Report.

Our audit found deficiencies in internal control over compliance and/or instances of noncompliance or other matters applicable to the University, as described in the accompanying Schedule of Findings and Questioned Costs under the heading Federal Award Findings and Questioned Costs. The findings identified in our audit are reported in the State's Single Audit Report in accordance with Title 2 CFR 200.516(a).

Our audit of the University found:

- the financial statements are presented fairly, in all material respects; •
- no internal control over financial reporting findings that require management's attention; •
- no instances of noncompliance or other matters that are required to be reported under Government Auditing Standards;
- federal award findings that require management's attention, as described in the accompanying Schedule of Findings and Questioned Costs under the heading Federal Award Findings.

#### Summary of Opinions

# **Type of Opinion**

**Opinion Unit Business-Type Activities** Unmodified Aggregate Discretely Presented Component Units Unmodified Unmodified **Fiduciary Activities** 

(Audited by Other Auditors)



#### INDEPENDENT AUDITOR'S 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

The Honorable Brian P. Kemp, Governor of Georgia Members of the General Assembly of the State of Georgia Members of the Board of Regents of the University System of Georgia and Dr. M. Brian Blake, President Georgia State University

We have audited the financial statements of the business-type activities, aggregate discretely presented component units, and fiduciary activities of the Georgia State University (University), a unit of the University System of Georgia, which is an organizational unit of the State of Georgia, as of and for the year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the University's basic financial statements, and have issued our report thereon dated December 18, 2024. We conducted our audit in accordance with the auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

Our report includes a reference to other auditors who audited the financial statements of the aggregate discretely presented component units, as described in our report on the University's basic financial statements. Those financial statements were audited in accordance with GAAS but not in accordance with *Government Auditing Standards*, except for the Georgia State University Research Foundation, Inc. Accordingly, this report does not include reporting on internal control over financial reporting or compliance and other matters associated with those component units nor does it include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors for the component unit specified above.

# **Report on Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the University's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the basic 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 a 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 or significant deficiencies may exist that were not identified.

# **Report on Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the 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 financial statements. 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.

Respectfully submitted,

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Greg S. Griffin State Auditor

December 18, 2024

Schedule of Findings and Questioned Costs

## FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

#### FA 2024-001 Improve Controls over the Awarding Process

Compliance Requirement: Internal Control Impact: Compliance Impact:	Eligibility Significant Deficiency Nonmaterial Noncompliance
Federal Awarding Agency:	U.S. Department of Education
Pass-Through Entity:	None
Assistance Listing Numbers and Titles:	84.007 – Federal Supplemental Educational Opportunity Grants 84.033 – Federal Work-Study Program 84.063 – Federal Pell Grant Program
Federal Award Numbers:	84.268 – Federal Direct Student Loans 84.379 – Teacher Education Assistance for College and Higher Education Grants (TEACH Grants) P007A231006 (Year: 2024), P033A231006 (Year: 2024), P063P230086 (Year: 2024), P268K240086 (Year: 2024), P379T240086 (Year: 2024)
Questioned Costs:	\$376

#### **Description:**

The Georgia State University Student Financial Aid Office improperly determined the Student Financial Assistance award amounts for eligible students.

#### **Background:**

To receive student financial assistance (SFA), students must complete a Free Application for Federal Student Aid (FAFSA). Once the FAFSA is processed, an Institutional Student Information Record (ISIR) is provided to Georgia State University (University). Among other things, the ISIR contains the applicant's Expected Family Contribution (EFC) and helps determine student eligibility, award amounts, and disbursements.

The following types of SFA was awarded and disbursed to students at the University:

- *Federal Pell Grant (Pell)* The Pell program provides grants to eligible students enrolled in eligible undergraduate programs and certain eligible post-baccalaureate teacher certificate programs and is intended to provide the foundation of financial aid. Maximum and minimum Pell awards are established by statute, but the amount for which each student is eligible is based on Pell Grant Payment and Disbursement Schedules published every year by the U.S. Department of Education (ED).
- *Federal Supplemental Educational Opportunity Grants (FSEOG)* The FSEOG program provides grants to eligible undergraduate students. Priority for FSEOG awards is given to Pell recipients who have the lowest EFC.

- *Federal Work-Study (FWS)* The FWS program provides part-time employment to eligible undergraduate and graduate students who need earnings to help meet the costs of postsecondary education.
- *Federal Direct Student Loans* The Direct Loan Program makes Direct Subsidized Loans and Direct Unsubsidized Loans to eligible students, and Direct PLUS Loans to eligible graduate or professional students or to eligible parents of eligible dependent undergraduate students, to pay for the cost of attending postsecondary educational institutions. Each student's ISIR, along with other information, is used by the University to originate the student's Direct Loan.
- *Teacher Education Assistance for College and Higher Education (TEACH) Grants* The TEACH Grants program is a non-need-based grant for students who are enrolled in an eligible program of study, and who agree to serve as a full-time teacher, in a high-need field, in an elementary school, secondary school, or educational service agency serving low-income students for at least four years within eight years of completing the program for which the TEACH Grant was awarded.

## Criteria:

As a recipient of federal awards, the University is required to establish and maintain effective internal control over federal awards that provides reasonable assurance of managing the federal awards in compliance with federal statutes, regulations, and the terms and conditions of the federal awards pursuant to Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), Section 200.303 – Internal Controls.

All ED SFA programs are authorized by Title IV of the Higher Education Act (HEA) of 1965, as amended (20 USC 1001 *et seq*.). The U.S. Department of Health and Human Services (HHS) SFA programs are authorized by the Public Health Service Act (PHS Act), which was amended by the Health Professions Education Partnership Act of 1998, Pub. L. No. 105-395 and, for the NFLP, further amended by the Patient Protection and Affordable Care Act of 2010 (Affordable Care Act), Pub. L. No. 111-148, Section 5311.

In addition, provisions included in Title 34 CFR Section 668 provide general provisions for administering SFA programs and Title 34 CFR Sections 675, 676, 685, 686, and 690 provide eligibility and other related program requirements that are specific to the FWS Program, FSEOG Program, Federal Direct Student Loans Program, TEACH Grants, and Federal Pell Grant Program, respectively.

# **Condition:**

A sample of 25 students from a population of 33,083 students who received student financial assistance funds was randomly selected for testing using a non-statistical sampling method. Student financial assistance files were reviewed to ensure that financial assistance was properly calculated and disbursed to eligible students. The following deficiency was identified:

• One student received \$376 more in Federal Pell Grant Program funds than they were eligible to receive based upon their enrollment status and EFC. This resulted in an over disbursement of \$376.

## **Questioned Costs:**

Upon testing a sample of \$213,145 in financial aid disbursements, known questioned costs of \$376 were identified for the student who received student financial assistance in excess of their eligibility. Using the total population amount of \$306,086,436, we project the likely questioned costs to be approximately \$539,954. The following assistance listing number was affected by the known and likely questioned costs: 84.063.

#### Cause:

In discussing this deficiency with management, they stated that a change to the student's ISIR after the term had ended resulted in the student being selected for verification. The student information was not configured to automatically adjust the student's Pell award based upon the results of verification procedures performed and caused the student to receive aid in excess of their amended eligibility.

#### Effect:

This deficiency may expose the University to unnecessary financial strains and shortages. The funds disbursed to students in excess of their eligibility must be returned to ED. Though the University may attempt to collect the funds from individual students affected by the error, these collection efforts could be unsuccessful as the students may no longer attend the University and/or fail to repay the funds. Additionally, the University was not in compliance with federal regulations concerning awarding of SFA funds to students.

#### **Recommendation:**

The University should review its processes and procedures for determining each student's financial aid eligibility. Where vulnerable, the University should develop and/or modify its policies and procedures to ensure that correct amounts will be awarded to students in conformity with federal requirements. Additionally, the University should develop and implement a monitoring process to ensure that controls are functioning properly. The University should also contact ED regarding resolution of this finding.

#### Views of Responsible Officials:

We concur with this finding.

# FA 2024-002 Strengthen Controls over the Return of Title IV Funds Process

Compliance Requirement: Internal Control Impact: Compliance Impact: Federal Awarding Agency:	Special Tests and Provisions Significant Deficiency Nonmaterial Noncompliance U.S. Department of Education
Pass-Through Entity:	None
Assistance Listing Numbers and Titles:	<ul> <li>84.007 – Federal Supplemental Educational Opportunity</li> <li>Grants</li> <li>84.033 – Federal Work-Study Program</li> <li>84.063 – Federal Pell Grant Program</li> <li>84.268 – Federal Direct Student Loans</li> <li>84.379 – Teacher Education Assistance for College and</li> <li>Higher Education Grants (TEACH Grants)</li> </ul>
Federal Award Numbers:	P007A231006 (Year: 2024), P033A231006 (Year: 2024), P063P230086 (Year: 2024), P268K240086 (Year: 2024), P379T240086 (Year: 2024)
Questioned Costs:	None Identified

#### **Description:**

Georgia State University did not properly perform the Return of Title IV funds process to ensure that unearned Title IV funds were returned in a timely manner.

#### **Background:**

Student financial assistance (SFA), or Title IV, funds are awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded. When a student withdraws from Georgia State University (University), the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive. If a recipient of Title IV grant or loan funds withdraws from a school after beginning attendance, the school must perform a Return of Title IV (R2T4) calculation to determine the amount of Title IV assistance earned by the student. Up through the 60% point in each period of enrollment, a pro rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60% point in the period of enrollment, a student is considered to have earned 100% of the Title IV funds the student was scheduled to receive during the period.

The R2T4 calculation is prepared using the following information associated with the period of enrollment:

- The student's Title IV aid information, including amounts disbursed and amounts that could have been disbursed,
- The withdrawal date and scheduled start date, end date, and break days, and
- Institutional charges, including tuition, fees, housing, food, books, supplies, materials, and equipment.

# Criteria:

As a recipient of federal awards, the University is required to establish and maintain effective internal control over federal awards that provides reasonable assurance of managing the federal awards in compliance with federal statutes, regulations, and the terms and conditions of the federal awards pursuant to Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), Section 200.303 – Internal Controls.

Provisions included in Title 34 CFR Section 668.22 provide requirements over the treatment of Title IV funds when a student withdraws. The University is required to determine the amount of Title IV funds that the student earned as of the student's withdrawal date when a recipient of Title IV funds withdraws from the University during a payment period or period of enrollment in which the recipient began attendance. A refund must be returned to Title IV programs when the total amount of the Title IV grant or loan assistance, or both, that the student earned is less than the amount of the Title IV grant and/or loan assistance that was disbursed to the student as of the withdrawal date.

Additionally, provisions included in Title 34 CFR Section 668.22(j) address the timeframe for the return of title IV funds and state "(1) An institution must return the amount of title IV funds for 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... (2) For an institution that is not required to take attendance, an institution must determine the withdrawal date for a student who withdraws without providing notification to the institution no later than 30 days after the end of the earlier of the – (i) Payment period or period of enrollment... (ii) Academic year in which the student withdrew; or (iii) Educational program from which the student withdrew."

# **Condition:**

A sample of 25 students from a population of 3,325 students who received student financial assistance (SFA) and withdrew from the University during the Fall 2023 and Spring 2024 semesters was randomly selected for testing using a non-statistical sampling method. The students' R2T4 calculations were reviewed to ensure that the refunds were calculated and returned in the correct amount to the proper funding agencies and/or student in a timely manner. The following deficiencies were noted:

• Funds were not returned to the appropriate grantor programs within the required time frame for five of the withdrawn students tested.

# Cause:

In discussing these deficiencies with management, they stated that staff turnover led to the return of funds in an untimely manner.

# Effect:

The University is not in compliance with the federal regulations concerning performing R2T4 procedures. Returning unearned Title IV funds to ED in an untimely manner may result in adverse actions and impact the University's participation in Title IV programs.

#### **Recommendation:**

The University should follow established procedures to ensure that unearned funds are returned to the appropriate accounts in a timely manner in accordance with federal regulations. Management should also develop and implement a monitoring process to ensure that controls are operating properly.

#### Views of Responsible Officials:

We concur with this finding.

## FA 2024-003 Improve Controls over Enrollment Reporting

Compliance Requirement:	Special Tests and Provisions
Internal Control Impact:	Significant Deficiency
Compliance Impact:	Nonmaterial Noncompliance
Federal Awarding Agency:	U.S. Department of Education
Pass-Through Entity:	None
Assistance Listing Numbers and Titles:	84.063 – Federal Pell Grant Program
	84.268 – Federal Direct Student Loans
Federal Award Numbers:	P063P230086 (Year: 2024), P268K240086 (Year: 2024)
Questioned Costs:	None Identified

#### **Description:**

Georgia State University did not report student enrollment information to required organizations in a timely and accurate manner.

#### **Background:**

Georgia State University (University) is required to report enrollment information under the Federal Pell Grant and Federal Direct Student Loans programs via the National Student Loan Data System (NSLDS). The University must review, update, and verify student enrollment statuses, program information, and effective dates periodically throughout the award year. The accuracy and timeliness of enrollment information reported by the University impacts its ability to properly administer the various Student Financial Assistance programs.

There are two categories of enrollment information reported to the NSLDS:

- Campus-Level, which includes data related to the student's overall enrollment at an institution's campus, and
- Program-Level, which includes data related to the student's program(s) of attendance.

The NSLDS Enrollment Reporting Guide provides institutions the requirements and guidance for reporting these specific campus-level and program-level enrollment details for students.

#### Criteria:

As a recipient of federal awards, the University is required to establish and maintain effective internal control over federal awards that provides reasonable assurance of managing the federal awards in compliance with federal statutes, regulations, and the terms and conditions of the federal awards

pursuant to Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), Section 200.303 – Internal Controls.

Regarding the enrollment reporting process, provisions included in Title 34 Section CFR 685.309(b) state that "(1) Upon receipt of an enrollment report from the Secretary, a school must update all information included in the report and return the report to the Secretary – (i) In the manner and format prescribed by the Secretary; and (ii) Within the timeframe prescribed by the Secretary. (2) Unless it expects to submit its next updated enrollment report to the Secretary within the next 60 days, a school must notify the Secretary within 30 days after the date the school discovers that – (i) … the student has ceased to be enrolled on at least a half-time basis for the period…" In addition, per the NSLDS Enrollment Reporting Guide issued by the U.S. Department of Education (ED), students who have received Federal Pell Grant Program funds will be included on the NSLDS roster file received by each institution and are subject to the same enrollment reporting requirements as those students who have received a loan under the William D. Ford Federal Direct Loan Program.

## **Condition:**

A sample of 25 students who received Federal Pell Grant Program and Federal Direct Student Loan funds and had a reduction or increase in attendance level, graduated, withdrew, dropped out, or enrolled but never attended during the audit period was randomly selected for testing using a nonstatistical sampling method. NSLDS Enrollment Detail information was reviewed for each student to ensure that the University accurately reported significant data elements under both the Campus-Level and Program-Level Record. The following deficiency was identified:

• For all students tested, the Program Enrollment Effective Date reflected on the Program-Level Record did not agree to the date on which the current enrollment status reported for the student was first effective.

#### Cause:

In discussing these deficiencies with management, they stated that a student information system defect led to the inaccurate reporting of Program Enrollment Effective Dates on the Program-Level record.

# Effect:

The University was not in compliance with federal regulations concerning enrollment reporting requirements. Additionally, if enrollment statuses are not submitted appropriately to NSLDS by the University, loan interest subsidies may be negatively affected, deferments of Federal Direct Student Loans may be continued in error, loan repayment dates could be recorded incorrectly, and the compilation of data associated with other Title IV aid programs could be adversely affected.

# **Recommendation:**

The University should follow established policies and procedures to ensure that all changes in student enrollment statuses are reported in accordance with timeframes prescribed by ED. Additionally, management should develop and implement a monitoring process to ensure that controls are operating properly.

# Views of Responsible Officials:

We concur with this finding.

Management's Corrective Action for Current Year Findings

GSU Corrective Action Response to Finding OFFICE OF THE VICE PRESIDENT FOR FINANCE & ADMINISTRATION

P.O. Box 4030 Atlanta, GA 30302-4030

Phone: 404/413-3070 Fax 404/413-3075



FA 2024-001 Improve Controls over the Awarding Process Federal Agency: Department of Education State Entity: Georgia State University

We concur with this finding.

#### **Corrective Action:**

Georgia State University (GSU) will ensure all team members are appropriately trained related to the process for locking student financial aid records and completing verifications after the term ends. Additionally, GSU has enhanced monitoring procedures to identify changes to institutional student information records after term ends with a verification indicator to ensure these accounts are resolved in a timely manner.

Estimated Completion Date: November 1, 2024

**Contact Person:** Joseph Steelman, Director of Financial Aid **Telephone:** 404-413-2126; **E-mail:** jsteelman@gsu.edu

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Dr. M. Brian Blake, President

GSU Corrective Action Response to Finding OFFICE OF THE VICE PRESIDENT FOR FINANCE & ADMINISTRATION

P.O. Box 4030 Atlanta, GA 30302-4030

Phone: 404/413-3070 Fax 404/413-3075



#### FA 2024-002 Strengthen Controls over the Return of Title IV Funds Process

Federal Agency: Department of Education State Entity: Georgia State University

We concur with this finding.

#### **Corrective Action:**

Georgia State University (GSU) will ensure all team members are appropriately trained related to the return to title IV process. Procedures have been enhanced to ensure that unearned funds required to be returned to the program due to return to title IV calculations are immediately reconciled and returned during the required window. GSU has established an Assistant Director over Electronic Processing to carry out these procedures.

Estimated Completion Date: November 1, 2024

**Contact Person:** Joseph Steelman, Director of Financial Aid **Telephone:** 404-413-2126; **E-mail:** jsteelman@gsu.edu

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Dr. M. Brian Blake, President

GSU Corrective Action Response to Finding OFFICE OF THE VICE PRESIDENT FOR FINANCE & ADMINISTRATION

P.O. Box 4030 Atlanta, GA 30302-4030

Phone: 404/413-3070 Fax 404/413-3075



FA 2024-003 Improve Controls over Enrollment Reporting Federal Agency: Department of Education State Entity: Georgia State University

We concur with this finding.

#### **Corrective Action:**

On July 29, 2024, Georgia State University (GSU) was made aware of a National Student Loan Data System (NSLDS) reporting defect in our student information system related to program level reporting. A system correction was installed on November 25, 2024. GSU will enhance monitoring procedures to ensure discrepancies in reporting to the NSLDS are identified and corrected in a timely manner.

Estimated Completion Date: January 15, 2025

**Contact Person:** Joseph Steelman, Director of Financial Aid **Telephone:** 404-413-2126; **E-mail:** jsteelman@gsu.edu

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Dr. M. Brian Blake, President

# **Georgia State University**

# Board of Regents of the University System of Georgia

Tom Bradbury	C. Everett Kennedy III
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# **Georgia State University Officials**

Dr. M. Brian Blake, President

Mr. L. Jared Abramson, Executive Vice President and Chief Operating Officer

Mr. Brad Freeman, Vice President for Finance and Administration