



Commonwealth of Massachusetts
Office of the State Auditor
Suzanne M. Bump

Making government work better

Official Audit Report – June 27, 2022

Department of Higher Education

For the period March 27, 2020 through February 28, 2021





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Dr. Carlos Santiago, Commissioner
Department of Higher Education
1 Ashburton Place, Room 1401
Boston, MA 02108

Dear Dr. Santiago:

I am pleased to provide this performance audit of the Department of Higher Education. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, March 27, 2020 through February 28, 2021. My audit staff discussed the contents of this report with management of the agency, whose comments are reflected in this report.

I would also like to express my appreciation to the Department of Higher Education for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMB", written over a light blue circular watermark.

Suzanne M. Bump
Auditor of the Commonwealth

cc: Chris Gabrieli, Chair of the Massachusetts Board of Higher Education

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LIST OF ABBREVIATIONS

BHE	Board of Higher Education
CARES	Coronavirus Aid, Relief, and Economic Security
CCAB	Commonwealth Commitment Advisory Board
COVID-19	2019 coronavirus
DHE	Department of Higher Education
EOE	Executive Office of Education
GEER	Governor’s Emergency Education Relief
HR/CMS	Human Resources Compensation Management System
ICP	internal control plan
IHE	institution of higher education
ISA	interdepartmental service agreement
MMARS	Massachusetts Management Accounting and Reporting System
OSA	Office of the State Auditor
OSFA	Office of Student Financial Assistance
SCF	standard contract form
US DOE	United States Department of Education

EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Department of Higher Education (DHE) for the period March 27, 2020 through February 28, 2021. In this performance audit, we determined the following:

- whether DHE ensured that it had interdepartmental service agreements or standard contract forms that provided guidance for the appropriate use of Governor’s Emergency Education Relief (GEER) funding with the institutions of higher education (IHEs) that received this funding
- whether DHE updated its internal control plan in compliance with policies issued by the Office of the Comptroller of the Commonwealth
- whether the DHE employees who were responsible for managing or administering GEER funding completed the required cybersecurity awareness training
- whether DHE met with the Commonwealth Commitment Advisory Board (CCAB), a group of representatives from Massachusetts’s public IHEs that helps coordinate the MassTransfer Commonwealth Commitment Program, to review the program
- whether DHE provided Massachusetts’s Board of Higher Education (BHE) with a report detailing the results of CCAB’s review of the MassTransfer Commonwealth Commitment Program.

Below is a summary of our findings and recommendations, with links to each page listed.

Finding 1 Page 11	DHE did not ensure that all employees who were responsible for managing and administering GEER funding completed annual cybersecurity awareness training.
Recommendations Page 11	<ol style="list-style-type: none">1. DHE should develop internal controls to ensure that all employees complete the required training annually.2. DHE should designate a department or individual to be responsible for overseeing the assignment and completion of required training.
Finding 2 Page 12	DHE did not meet with CCAB to review the MassTransfer Commonwealth Commitment Program.
Recommendations Page 13	<ol style="list-style-type: none">1. DHE should meet with CCAB at least annually to review the MassTransfer Commonwealth Commitment Program and make recommendations about its improvement.2. Alternatively, if DHE’s commissioner has approved the disbanding of CCAB and changes to the nature and frequency of reviews, DHE should update the <i>MassTransfer Procedures Manual</i> to accurately identify the group responsible for the review of the MassTransfer Commonwealth Commitment Program and the frequency and nature of the review.

Finding 3 Page <u>15</u>	DHE did not provide reports or communications to BHE regarding CCAB’s review of the MassTransfer Commonwealth Commitment Program.
Recommendation Page <u>16</u>	DHE should provide BHE, at least annually, with reports or communications about the review of the MassTransfer Commonwealth Commitment Program by CCAB or the group appointed to assume its responsibilities.

OVERVIEW OF AUDITED ENTITY

After a reorganization of Massachusetts’s educational governance in 2008, the Board of Higher Education (BHE), a department within the Executive Office of Education (EOE), was created by Section 1 of Chapter 15A of the Massachusetts General Laws. BHE is composed of 13 voting members, who are responsible for defining the mission of, and coordinating, the state’s system of public higher education with support from the Department of Higher Education (DHE). The system of public higher education includes 15 community colleges, nine state universities, and five University of Massachusetts campuses.

According to its website at www.mass.gov, DHE “is the staff to the 13-member Board of Higher Education (BHE), responsible for executing the Board’s policies and day-to-day operations.” DHE was created by Section 6 of Chapter 15A of the General Laws and is headed by a commissioner. DHE had 67 employees and a budget of \$5,186,847 in fiscal year 2021.

The same website states,

The mission of the Board of Higher Education is to ensure that Massachusetts residents have the opportunity to benefit from a higher education that enriches their lives and advances their contributions to the civic life, economic development, and social progress of the Commonwealth.

DHE’s website at www.mass.edu states,

At its December 11, 2018 meeting, the BHE adopted the following Vision Statement to guide the work of developing a new statewide strategic plan for public higher education.

The Massachusetts Board of Higher Education (BHE) aims to sustain and expand on Massachusetts’ unique leadership position in higher education as defined by the strength and reputation of our private and public postsecondary institutions and our nation-leading level of attainment among our adult citizens. To further realize those goals and to ensure that public higher education opens doors of opportunity and fulfillment for traditionally underserved populations, we elect to make our top statewide policy and performance priority—Significantly raise the enrollment, attainment and long-term success outcomes among under-represented student populations. We intend this equity lens priority to guide campus and system performance measurement and promote initiatives and policies that collectively expand success for residents and for our economy and society, including the development of an integrated financial planning process to ensure long term sustainability and affordability.

Emergency Education Relief Funding

The Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law March 27, 2020. The United States Department of the Treasury’s website states that the CARES Act “provided fast and direct

economic assistance for American workers, families, small businesses, and industries.” According to the United States Office of Elementary and Secondary Education, the act provided approximately \$3 billion for the Governor’s Emergency Education Relief (GEER) Fund that was awarded to states by the United States Department of Education (US DOE).

On April 21, 2020, US DOE issued a form titled “Certification and Agreement for Funding under the Education Stabilization Fund Program—Governor’s Emergency Education Relief Fund” to the Governors of all 50 states. Governors were to complete the form in order to receive their states’ GEER Fund allocations. According to the form,

Under the Governor’s Emergency Education Relief Fund (GEER Fund), [US DOE] awards grants to Governors for the purpose of providing local educational agencies (LEAs), institutions of higher education (IHEs), and other education related entities with emergency assistance as a result of the Novel Coronavirus Disease 2019 (COVID-19).

Of the \$2.95 billion dollars to be awarded, Massachusetts was awarded \$50,843,703 based on Section 18002(b) of the CARES Act. Of that amount, \$21,218,277 was to be administered by DHE, through interdepartmental service agreements with EOE, as follows:

- An allocation of \$14,806,625 for reopening grants to support the safe return of students, staff members, and faculty members to campus and to support their remote learning needs.
- A sub-allocation of \$95,400 of the above funds for DHE to administer 2019 coronavirus (COVID-19) response grants to institutions of higher education (IHEs).
- An allocation of \$1,075,000 for DHE to contract with Ernst & Young—Parthenon (a global strategy consulting organization) to support DHE’s fiscal monitoring activities.
- An allocation of \$2,500,000 for DHE’s Office of Student Financial Assistance (OSFA) to give to community colleges to distribute to students as emergency, need-based financial aid. According to DHE’s website, OSFA’s purpose is as follows:

OSFA is primarily responsible for the management and oversight of all state funded financial aid programs and advises the Board of Higher Education about financial aid policy matters. . . . OSFA is the principal agency for promoting access to higher education through early awareness initiatives that foster the recognition of college as a viable postsecondary option and the availability of financial aid resources to help students and families meet college costs.

- An allocation of \$1,000,000 to mitigate the effect of COVID-19 on junior and senior high school students who had limited access to on-campus dual-enrollment courses through the Massachusetts Commonwealth Dual Enrollment Partnership between DHE and the institutions that make up Massachusetts’s public higher education system. According to DHE’s website,

*The Massachusetts **Commonwealth Dual Enrollment Partnership (CDEP)** provides opportunities for Massachusetts high school students to take college-level courses for free or at a discounted price and earn credit toward high school completion and their future college degrees.*

- An allocation of \$1,836,652 to mitigate the effect of COVID-19 on high school students participating in Early College Initiative programs. According to DHE's website,

The purpose of the Early College Initiative is [to] create and maintain partnerships connecting our state's districts and high schools with our state's colleges in order to give thousands of Massachusetts students, especially first-generation college-goers, access to college completion and career success.

As of April 27, 2021, DHE had disbursed a total of \$20,364,340 of the \$21,218,277 to the IHEs, leaving \$853,937 for it to reallocate.

MassTransfer Program

MassTransfer was established in 1974 as the Commonwealth Transfer Compact. MassTransfer offers cost savings to help individuals attend community college to earn associate's degrees and then transfer to a state college or university to earn their bachelor's degrees. There are currently five programs and initiatives designed to meet this objective. One of them is the MassTransfer Commonwealth Commitment Program.

MassTransfer Commonwealth Commitment Program

The MassTransfer Commonwealth Commitment Program was announced in April 2016 with a goal of providing students of the Commonwealth's public IHEs with financial aid so they could complete their bachelor's degrees in a timely manner.

By participating in the MassTransfer Commonwealth Commitment Program, students commit to completing their associate's degrees within two and a half years, transferring to a state university or University of Massachusetts campus, and completing their bachelor's degrees within two more years. They must also maintain full-time continuous enrollment and earn a cumulative 3.0 grade point average. In return, they receive a tuition freeze while enrolled and a 10% rebate of tuition and mandatory fees. Expenses such as housing, health insurance, meal plans, books, parking, and supplies are not covered by the program. Participating students are guaranteed admission (space permitting in the major and college) and transfer of credits.

Commonwealth Commitment Advisory Board

The Commonwealth Commitment Advisory Board (CCAB) is a group of campus representatives from Massachusetts's IHEs who coordinate the implementation of the MassTransfer Commonwealth Commitment Program at the institutions they represent. As of September 2018, CCAB was composed of 25 campus representatives, ranging from deans and vice presidents to directors and coordinators. The Commonwealth Commitment Program Internal Implementation Team is a group of five DHE employees designated to represent DHE during CCAB meetings. This team and CCAB, as a working group, are responsible for reviewing all aspects of the MassTransfer Commonwealth Commitment Program and making recommendations to BHE for program improvement. DHE is responsible for convening this working group at least annually.

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor (OSA) has conducted a performance audit of certain activities of the Department of Higher Education (DHE) for the period March 27, 2020 through February 28, 2021.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Did DHE ensure that each institution of higher education (IHE) signed an interdepartmental service agreement (ISA) or standard contract form (SCF) for the amount of Governor’s Emergency Education Relief (GEER) funding it was to receive as determined by Massachusetts’s Executive Office of Education (EOE)?	Yes
2. Did DHE ensure that the guidance for the appropriate use of GEER funding outlined in its ISA with EOE was incorporated into the ISAs and SCFs for IHEs receiving GEER funding?	Yes
3. Did DHE update its internal control plan (ICP) to address the 2019 coronavirus (COVID-19) pandemic in accordance with the Office of the Comptroller of the Commonwealth’s “COVID-19 Pandemic Response Internal Controls Guidance,” dated September 30, 2020?	Yes
4. Did DHE employees who were responsible for managing and administering GEER Fund grants complete cybersecurity awareness training as required by Section 6.2.4 of the Executive Office of Technology Services and Security’s Information Security Risk Management Standard IS.010?	No; see Finding 1
5. Did DHE meet, at least annually, with the Commonwealth Commitment Advisory Board (CCAB) to monitor and review the MassTransfer Commonwealth Commitment Program, as required by its “Commonwealth Commitment to College Access, Affordability, and Completion” memorandum of understanding with Massachusetts’s public IHEs?	No; see Finding 2

Objective	Conclusion
6. Did DHE provide a report to Massachusetts’s Board of Higher Education (BHE) regarding DHE’s meetings with CCAB, as required by the “Commonwealth Commitment to College Access, Affordability, and Completion” memorandum of understanding?	No; see Finding 3

To achieve our audit objectives, we gained an understanding of the DHE internal controls we deemed relevant to the objectives by reviewing agency policies and procedures, as well as conducting interviews with DHE employees who were responsible for administering and managing the areas under audit.

To determine whether DHE ensured that each IHE signed an ISA or SCF for the amount of GEER funding it was to receive, we performed the following procedures:

- We received from DHE the forms and attachments for all 66 ISAs and SCFs for GEER funding that were executed during the audit period, as well as DHE’s Office of Student Financial Assistance (OSFA) payment schedule for the 15 IHEs that received emergency financial aid.
- We inspected each of the 66 ISAs and SCFs to ensure that the amount disbursed by DHE did not exceed the maximum obligation and that the agreement or form was signed and dated by the IHE and DHE.
- We inspected emails between DHE and the 15 IHEs that received GEER funding for emergency financial aid to ensure that each IHE was notified of its eligibility for, and allocation of, emergency financial aid. We reviewed the OSFA payment schedule to ensure that the amount disbursed by DHE to each IHE did not exceed the IHE’s allocated amount for emergency financial aid.

To determine whether DHE ensured that it incorporated the guidance for the appropriate use of GEER funding into the ISAs and SCFs with the IHEs, we performed the following procedure:

- For the same population of 66 ISAs and SCFs and 15 IHEs that received emergency financial aid, we inspected the forms and attachments provided to ensure that a “Terms of Performance and Justifications” attachment was included. We then inspected these terms to ensure that they contained guidance on grantee eligibility and allowable uses of grant funds.
- In one instance, DHE could not locate the attachments for an ISA. We verbally recommended to DHE that it retain all grant and contract forms and attachments.

To determine whether DHE had updated its ICP, we performed the following procedure:

- We received from DHE the ICP that was in effect during the audit period and inspected it to ensure that DHE had updated it to reflect the effect of the COVID-19 pandemic on its business and operating processes.

To determine whether DHE ensured that each employee who was responsible for administering or managing GEER funding completed cybersecurity awareness training, we performed the following procedure:

- We obtained from DHE a list of the 10 employees who were responsible for administering or managing GEER funding during the audit period. We received the training records for these employees and inspected their records to determine whether they had completed the required training during the audit period.

To determine whether DHE had met with CCAB to review the MassTransfer Commonwealth Commitment Program and submitted a report about that review to BHE, we performed the following procedures:

- We asked DHE officials about their oversight and process for scheduling and documenting meetings with CCAB to review the MassTransfer Commonwealth Commitment Program, as well as how DHE documented and reported the results of CCAB's review and reported any recommendations to BHE.
- We requested all agendas and minutes for CCAB meetings during the audit period and inspected the documentation provided to identify the topics discussed and determine whether all aspects of the MassTransfer Commonwealth Commitment Program had been reviewed.
- We requested all reports and communications from DHE to BHE regarding CCAB's review of the MassTransfer Commonwealth Commitment Program.

Data Reliability Assessment

In 2018, OSA performed a data reliability assessment of the Massachusetts Management Accounting and Reporting System (MMARS) for the period April 1, 2017 through March 31, 2018. The assessment focused on reviewing selected system controls, including access, security awareness, audit and accountability, configuration management, identification and authentication, and personnel security. During the current audit, we performed electronic testing of MMARS data to test for duplicates and blank fields and to ensure that the dates of DHE's expenses were within the audit period. Additionally, we traced the amounts on all 66 ISAs and SCFs, and the amounts of the aforesaid 15 IHEs' financial aid payments, from DHE's grant tracking file to the transaction data in MMARS by comparing the data fields "Institution Name," "Grant Type," and "Expenditure Amount" in DHE's grant tracking file to the data fields "Legal Name," "Accounting Line Description," and "Cash Expense Amount" in MMARS, respectively, to ensure that the data fields in the two sources matched.

We obtained a list of all DHE employees during the audit period from the state's Human Resources Compensation Management System (HR/CMS). To determine the accuracy of the data on the list, we

performed electronic testing to identify duplicates and blank fields and ensure that the data were within the audit period. We also traced the employee names from the list of 10 that DHE had given us to the information in HR/CMS to ensure that all 10 listed individuals were DHE employees during the audit period.

Based on the results of our data reliability assessments, we determined that the information obtained for our audit period was sufficiently reliable for the purpose of our audit objectives.

DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

1. The Department of Higher Education did not ensure that all employees who were responsible for managing and administering Governor's Emergency Education Relief funding completed annual cybersecurity awareness training.

Five of the 10 Department of Higher Education (DHE) employees who were responsible for managing and administering Governor's Emergency Education Relief funding did not complete annual cybersecurity awareness training. A lack of such training may lead to user error and compromise the integrity and security of protected information in DHE's information technology systems.

Authoritative Guidance

Section 6.2.4 of the Executive Office of Technology Services and Security's Information Security Risk Management Standard IS.010 states, "All personnel will be required to complete Annual Security Awareness Training."

Reasons for Issue

DHE does not have internal controls to ensure that all employees complete required annual training. It also does not have a department or individual designated to oversee the assignment and completion of required training. DHE relies solely on the support of the Human Resources Department of the state Executive Office of Education to notify employees of required training via email.

Recommendations

1. DHE should develop internal controls to ensure that all employees complete the required training annually.
2. DHE should designate a department or individual to be responsible for overseeing the assignment and completion of required training.

Auditee's Response

The DHE acknowledges the . . . finding that five of the ten employees did not timely complete their annual cybersecurity training during the audit period of March 27, 2020 to February 28, 2021.

The Department agrees with the auditor's note that the Department relies solely on the support of Executive Office of Education's (EOE) Human Resource Department to notify employees of required training, and would like to remind the [Office of the State Auditor] that in 2015, HR functions across the Executive Branch agencies were consolidated at the Secretariat level. Rather than a Director

for Human Resources within the DHE, each Secretariat has [a Human Resources Department] and agencies are assigned Business Partners. The fact that the function is removed and not directly managed by the DHE, coupled with lack of adequate administrative resources, has made it challenging to thoroughly assess the timely completion of required trainings. The DHE has had an agency-wide decrease in full-time-equivalent positions, from 65 in fiscal year 2015 to 55 at the end of fiscal year 2017. Further exacerbating this challenge was the transition to remote work during the period of the audit at the height of the COVID-19 global pandemic.

The Department appreciates the auditor's finding and affirms its commitment to working closely with EOE to help ensure that all staff are adequately and timely trained. To that end, the DHE has designated an Agency Learning Administrator which is a security role that allows the person the ability to run analytic reports across the Department, build and assign learning curriculum and to assign that to all employees in the agency, and to view individual employee transcripts among other functions. The Agency Learning Administrator is not a new position but is managed within the Department's [full time equivalent employee] cap and current resources. MassAchieve is the new learning system for Executive Department employees and was launched after the audit period in August 2021.

The Department notes that several of employees identified for the . . . audit have completed their cybersecurity training for this year and the Department is committed to ensuring it is in full compliance and will work with EOE to ensure all employees' trainings are complete within the appropriate training cycle.

Auditor's Reply

Based on its response, it appears that DHE is taking the recommended actions to correct the deficiencies noted during the audit and prevent their reoccurrence.

2. DHE did not meet with the Commonwealth Commitment Advisory Board to review the MassTransfer Commonwealth Commitment Program.

DHE did not meet with the Commonwealth Commitment Advisory Board (CCAB) at least annually to review all aspects of the MassTransfer Commonwealth Commitment Program. These aspects include cost structures, program operations, implementation, accreditation, and licensure-related issues.

Changes in critical components of the program or higher education environment, such as state funding availability, college or university accreditation, and degree pathway¹ availability, happen frequently. If DHE does not ensure that it meets with CCAB to review all aspects of the MassTransfer Commonwealth

1. Degree pathways are the associate's-to-bachelor's-degree agreements between community colleges and public IHEs offering bachelor's degrees under the MassTransfer Commonwealth Commitment Program. The pathways ensure that all credits earned through a community college's associate's degree program will be transferred and applied to another IHE's bachelor's degree program.

Commitment Program, the program may not operate effectively because necessary or recommended changes are not identified and made.

Authoritative Guidance

The "Commonwealth Commitment to College Access, Affordability, and Completion" memorandum of understanding states,

Annually, a working group of campus and DHE representatives will meet to review all aspects of the program, including cost structures, program operations, implementation, accreditation and licensure related issues, and will recommend operational changes or adjustments as deemed necessary.

This requirement is reiterated in DHE's *MassTransfer Procedures Manual*:

- 1. At least once annually, the Department will convene a working group of campus and Department representatives to review all aspects of the program, including cost structures, program operations, implementation, accreditation and licensure-related issues.*
- 2. This working group will recommend to the Department operational changes or adjustments as deemed necessary.*
- 3. The campus representatives to this working group will be known as the Commonwealth Commitment Advisory Board.*

Reasons for Issue

DHE officials told us in an email on November 29, 2021 that CCAB had been "absorbed by the MassTransfer statewide group"² and that they "did not identify a need to update the Board [of Higher Education, or BHE] on matters related to MassTransfer during the audit period." DHE could not provide evidence that CCAB had been formally disbanded or its responsibilities transferred to a different group.

Recommendations

- DHE should meet with CCAB at least annually to review the MassTransfer Commonwealth Commitment Program and make recommendations about its improvement.
- Alternatively, if DHE's commissioner has approved the disbanding of CCAB and changes to the nature and frequency of reviews, DHE should update the *MassTransfer Procedures Manual* to accurately

2. According to its meeting agendas and minutes, the MassTransfer Statewide Joint Transfer Group consists of approximately 100 individuals (transfer professionals, registrars, DHE staff members, and others) who receive updates on, and discuss, DHE's equity agenda and aspects of MassTransfer, such as its website, its "Policy and Implementation Guidelines," and the MassTransfer Commonwealth Commitment Program.

identify the group responsible for the review of the MassTransfer Commonwealth Commitment Program and the frequency and nature of the review.

Auditee's Response

The Department welcomes comments and ideas on ways it can continuously improve program administration and evaluation. The Department is also in agreement in principle of the need to regularly evaluate programs and their effectiveness.

To this point, the Department has recently evaluated MassTransfer, including the Commonwealth Commitment program, through an Equity Agenda related review, including conducting interviews with campus administrators and institutional transfer counselors and evaluating quantitative institutional outcomes. The MassTransfer Policy and Implementation Guidelines are reviewed and revised regularly, in partnership and with input from institutional stakeholders. The comprehensive and collaborative nature of the program has gained it state and national recognition. For example, a typology framework developed by [consulting firms] for the purposes of assessing state transfer policies in four areas: pathways and credit applicability, student supports, institutional collaboration and implementation, and accountability, found that Massachusetts has one of the most robust transfer systems in the country. Further, in the spirit of continuous improvement, the Department has partnered with external researchers and has several initiatives underway to evaluate policy outcomes for the MassTransfer policy.

The Commonwealth Commitment Advisory Board (CCAB) was absorbed by the MassTransfer Statewide Committee, and the program has been an item on the meeting agendas and a continued topic of conversation at systemwide meetings since the CCAB was dissolved. All members of the CCAB are invited [to] MassTransfer Statewide Committee meetings. The Department will update the MassTransfer Procedures Manual accordingly.

Auditor's Reply

In its response, DHE states that “the Department has recently evaluated MassTransfer, including the Commonwealth Commitment program, through an Equity Agenda related review.” No documentation was provided to us detailing the evaluation that took place. Further, DHE’s statement does not address our audit’s finding that CCAB did not review the MassTransfer Commonwealth Commitment Program at least annually.

Though DHE also states that the CCAB “was absorbed by the MassTransfer Statewide Committee,” no evidence was provided to us to support this claim. DHE continues, “The program has been an item on the meeting agendas and a continued topic of conversation at systemwide meetings since the CCAB was dissolved.” Although DHE did provide two agendas for meetings that the MassTransfer Statewide Joint Transfer Group (referred to in DHE’s response above as the MassTransfer Statewide Committee) held during the audit period, and each one did contain a line item for “MassTransfer Commonwealth

Commitment," the accompanying meeting minutes did not contain any mention of this item being discussed at the meetings. Further, we believe that a brief discussion of the program during meetings scheduled for no more than two hours, with 12 items on the agenda, would not have constituted evidence of the review of the MassTransfer Commonwealth Commitment Program by the CCAB that the *MassTransfer Procedures Manual* requires.

DHE is taking measures to address our recommendation of updating the manual with regard to the nature and frequency of its review of the MassTransfer Commonwealth Commitment Program.

3. DHE did not provide reports or communications to BHE regarding CCAB's review of the MassTransfer Commonwealth Commitment Program.

During the audit period, DHE did not provide any reports or communications to BHE regarding CCAB's review of the MassTransfer Commonwealth Commitment Program. Therefore, BHE may not be aware of the program's performance or the feedback from participating institutions of higher education about their experiences, suggestions, or complaints. This could result in BHE being unaware of program changes that DHE deems necessary for the program's continued success.

Authoritative Guidance

The "Commonwealth Commitment to College Access, Affordability, and Completion" memorandum of understanding states,

Based on feedback received from the working group . . . DHE staff will report back to the [Massachusetts] Board of Higher Education and will make any necessary recommendations to help further the goals of this initiative.

DHE's *MassTransfer Procedures Manual* states,

Based on feedback received from the Advisory Board and from the institutional experience during the program, Department staff will report back to the Massachusetts Board of Higher Education and will make any necessary recommendations to help further the goals of [the MassTransfer Commonwealth Commitment Program].

Reasons for Issue

According to DHE officials, CCAB has been dissolved (see [Finding 3](#)). Therefore, CCAB did not meet and DHE could not provide reports or communications of CCAB's reviews of the MassTransfer Commonwealth Commitment Program.

Recommendation

DHE should provide BHE, at least annually, with reports or communications about the review of the MassTransfer Commonwealth Commitment Program by CCAB or the group appointed to assume its responsibilities.

Auditee's Response

According to the BHE By-Laws, agenda setting related to Board meetings is a collaborative process which occurs between the Chair and the Commissioner. The Commissioner keeps the Board Chair up to date on procedures, processes, and priorities in implementing Board policies. During the audit period, which paralleled the beginning and height of the global COVID-19 pandemic, the Board met six times and agendas were predominantly focused on matters related to responding to the pandemic, such as supporting institutions and keeping students, faculty and staff safe. With the transition to a remote environment and competing priorities all Committee meetings were suspended and not resumed until February 2021.

Prior to the initiation of the [audit review period], MassTransfer was an agenda item at the two Academic Affairs Committee meetings that took place prior to the audit period, which is illustrative [of] a more "normal" time period during which the Board of Higher Education and its Committees would receive regular updates on several programs and policies and would have the opportunity to identify programmatic or policy issues for further review or development. During its January 28, 2020 meeting, the Academic Affairs Committee endorsed a series of transfer principles that seek to ease and clarify the process of transferring earned credit from one college to another, whether among themselves or from other public or private institutions; to provide standards for the evaluation of alternative sources of credit; to reduce the time and cost of completing a college education; and to increase the opportunities for graduation of their students. The principles were presented at the December 10, 2019 full Board meeting, and there was a robust discussion at that meeting about the MassTransfer policy and programs more broadly.

Auditor's Reply

In its response, DHE states, "With the transition to a remote environment and competing priorities all Committee meetings were suspended and not resumed until February 2021." This suggests that committees were not expected to fulfill their responsibilities from the onset of the pandemic until February 2021. No evidence was provided to us during or after the audit to support this claim. The claim is also contradicted by the fact that DHE submitted agendas and minutes for two MassTransfer Statewide Committee meetings that were conducted in June and December 2020.

Further, no evidence was provided to us during the audit to support DHE's claim that MassTransfer was "an agenda item at the two Academic Affairs Committee meetings that took place prior to the audit period." We believe that a meeting of the Academic Affairs Committee to discuss the entire MassTransfer

Program would not constitute an annual review by CCAB that was specific to the MassTransfer Commonwealth Commitment Program. Finally, MassTransfer being an agenda item or discussed by any internal DHE committee or board does not indicate that DHE reported to BHE about the MassTransfer Commonwealth Commitment Program.

We reiterate our recommendation that DHE provide BHE, at least annually, with reports or communications about the review of the MassTransfer Commonwealth Commitment Program by CCAB or the group appointed to assume its responsibilities.