



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

*Making government work better*

Official Audit Report – Issued June 28, 2019

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## Fitchburg State University

For the period July 1, 2016 through June 30, 2018





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*Making government work better*

June 28, 2019

Dr. Richard S. Lapidus, President  
President's Office  
Fitchburg State University  
160 Pearl Street  
Fitchburg, MA 01420

Dear Dr. Lapidus:

I am pleased to provide this performance audit of Fitchburg State University. This report details the audit objectives, scope, methodology, finding, and recommendation for the audit period, July 1, 2016 through June 30, 2018. My audit staff discussed the contents of this report with management of the university, whose comments are reflected in this report.

I would also like to express my appreciation to Fitchburg State University for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMBump".

Suzanne M. Bump  
Auditor of the Commonwealth

cc: Donald R. Irving, Chair, Fitchburg State University Board of Trustees

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## 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 certain activities of Fitchburg State University (FSU) for the period July 1, 2016 through June 30, 2018.

In this performance audit, we reviewed and evaluated FSU's policies and procedures for ensuring its compliance with certain requirements of the Americans with Disabilities Act of 1990.

Below is a summary of our finding and recommendation, with links to each page listed.

<b>Finding 1</b> <b>Page <a href="#">6</a></b>	FSU did not have documentation to substantiate that resident assistant staff members received required training on how to respond to emergencies.
<b>Recommendation</b> <b>Page <a href="#">7</a></b>	FSU should document that its resident assistants have received the required emergency response training.

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## **OVERVIEW OF AUDITED ENTITY**

Fitchburg State University (FSU) is a member of the Massachusetts public higher-education system, which consists of 15 community colleges, 9 state universities, and 5 University of Massachusetts campuses. Founded in 1894, the university is an accredited public four-year undergraduate and graduate institution that offers degrees in a variety of disciplines. For the 2018 fiscal year, FSU had a student enrollment of approximately 5,200.

FSU is authorized by Section 5 of Chapter 15A of the Massachusetts General Laws and operates under the direction of a board of trustees, whose members are appointed by the Governor. The board operates under regulations promulgated by the state's Board of Higher Education; its responsibilities under these regulations include setting student fees and university policies, approving annual plans, and articulating an FSU mission statement that is consistent with the mission of the Commonwealth's system of public higher education.

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## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

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 certain activities of Fitchburg State University (FSU) for the period July 1, 2016 through June 30, 2018.

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. Does FSU have procedures in place to review, monitor, and improve support for students with disabilities?	Yes
2. Has FSU developed an emergency evacuation plan that takes into account the needs of students with various disabilities, communicated it to the campus community, and trained residence hall personnel on it?	Partially; see <b>Finding 1</b>
3. Does FSU provide the necessary accommodations, auxiliary aids, and academic adjustments (including support services) to students with disabilities to ensure equal access to its programs, facilities, and services?	Yes

To achieve our objectives, we gained an understanding of FSU's internal control environment related to our audit objectives by reviewing applicable laws, regulations, and university policies and procedures, as well as conducting inquiries with management.

To determine whether FSU had procedures in place to review, monitor, and improve support for students with disabilities, we interviewed staff members from FSU's Human Resources Office and Disability Services Office to gain an understanding of the procedures used to administer disability services to students. We confirmed with outside legal counsel that no claims were filed against FSU through the Massachusetts Commission Against Discrimination or the Civil Rights Division of the

Massachusetts Attorney General's Office during the audit period for failure to accommodate people with disabilities. We reviewed all meeting minutes recorded by the board of trustees during the audit period to determine whether there were any discussions related to disability issues and whether the board of trustees approved the state Board of Higher Education's Equal Opportunity, Diversity and Affirmative Action Plan. To verify communication of disability service performance, we obtained the two annual Disability Service Reports that were prepared by the Disability Services Office during our audit period. These reports were used to communicate disability service performance (strengths, weaknesses, opportunities, and threats) to the associate dean of students and vice president of Student Affairs. We met with the vice president of Student Affairs to obtain an understanding of the communication structure within the Office of Student Affairs and FSU's executive management team. We also met with select representatives from FSU's Admissions Office and Autism Spectrum Disorder Group to determine whether support services for students with disabilities were effectively communicated to the student population.

We reviewed FSU's Emergency Management Plan to determine whether it took into account the needs of students with disabilities. We interviewed a number of key employees regarding their knowledge of the Emergency Management Plan and its emergency evacuation procedures and documented these discussions. According to FSU staff members, no students with physical disabilities lived in FSU dormitories during our audit period. We obtained and reviewed policies and procedures used to train residence hall personnel on evacuating students with disabilities from the dormitories. We met with two out of three students who were employed as resident assistants during the audit period and available during our fieldwork to confirm that they had participated in emergency evacuation training on procedures related to students with disabilities.

To determine whether FSU properly provided disability accommodations to students, we selected a nonstatistical random sample of 60 students who requested accommodations during the audit period from a list of 634 such students that was obtained from an FSU Microsoft Access database maintained by the Disability Services Office. We reviewed the Request for Accommodation Forms submitted by students and confirmed that the Disability Services Office had evaluated the forms. In addition, we reviewed supporting medical documentation confirming the disabilities. We also noted the types of disability, such as learning, emotional/psychological, or physical. For each student who received accommodations, we listed the approved accommodations.

To test the reliability of the list of 634 students who had requested disability accommodations during the audit period, we randomly selected 5 students from the Access database and traced their information back to their hardcopy files, noting completeness and accuracy. To complete our testing, we randomly selected five hardcopy files and traced their information back to the Access database, noting completeness and accuracy. Based on these procedures, we determined that the data obtained from the Access database were sufficiently reliable for the purposes of this report.

We used nonstatistical sampling methods and therefore did not project the results of our testing to the population.



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## DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

### **1. Fitchburg State University did not have documentation to substantiate that resident assistant staff members received required training on how to respond to emergencies.**

During our audit period, Fitchburg State University (FSU) did not document that its resident assistant staff members received required training on how to respond to emergencies such as fires or campus violence. We reviewed resident assistant contracts maintained by the housing director that stated that emergency response training was required; however, there was no documentation indicating that resident assistants had attended the training. As a result, there is inadequate assurance that these staff members have been properly trained to assist the students living in their residence halls during emergencies.

#### **Authoritative Guidance**

FSU's *Annual Security and Fire Safety Report* provides safety guidance to the campus community. Regarding resident assistant emergency response training, the report states,

*Each residence hall has . . . a staff of student Resident Assistants. . . . Resident Assistants receive comprehensive training before each academic year begins. This training includes how to respond to various emergencies (ranging in scope from psychological to health concerns), fire evacuations, sexual misconduct or violence, vandalism, . . . etc.*

To meet the above requirement, FSU should ensure that all students employed as resident assistant staff members have received this training by documenting it in their files.

Section 3.03 of the Office of the Comptroller of the Commonwealth's *Internal Control Guide*, dated June 2015, states,

*Documentation . . . provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel, as well as a means to communicate that knowledge as needed to external parties, such as auditors.*

#### **Reasons for Lack of Documentation**

FSU staff members stated that each resident assistant is supervised by a resident director. They noted that because resident directors provide the emergency response training, they know whether a student has attended the training and thus is qualified to be a resident assistant.

## **Recommendation**

FSU should document that its resident assistants have received the required emergency response training.

## **Auditee's Response**

*We have begun addressing the noted finding related to the documentation of resident assistant emergency response training and will soon have the necessary process in place.*