



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

Making government work better

Official Audit Report – Issued June 20, 2018

Greenfield Community College

For the period July 1, 2015 through June 30, 2017





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Dr. Robert Pura, President
Office of the President
Greenfield Community College
1 College Drive
Greenfield, MA 01301

Dear Dr. Pura:

I am pleased to provide this performance audit of Greenfield Community College. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2015 through June 30, 2017. My audit staff discussed the contents of this report with management of the college, whose comments are reflected in this report.

I would also like to express my appreciation to Greenfield Community College 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: Robert Cohn, Chair, Greenfield Community College 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 Greenfield Community College (GCC) for the period July 1, 2015 through June 30, 2017.

In this performance audit, we examined GCC's compliance with certain requirements of the Americans with Disabilities Act of 1990 (ADA) and the Massachusetts Board of Higher Education's Policy for Affirmative Action, Equal Opportunity and Diversity for Community Colleges.

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

Finding 1 Page 5	GCC did not have an emergency evacuation plan that took into account students with disabilities.
Recommendation Page 5	GCC should take the measures necessary to ensure that it complies with all of the requirements of the ADA and with its own newly created procedures for the emergency evacuation of students with disabilities.

Post-Audit Action

GCC management has developed an updated emergency evacuation plan that takes into account the needs of students with disabilities.

OVERVIEW OF AUDITED ENTITY

Greenfield Community College (GCC) is authorized by Section 5 of Chapter 15A of the Massachusetts General Laws and operates under the direction of a 10-member board of trustees. GCC's board operates under regulations promulgated by the state's Board of Higher Education; its responsibilities under these regulations include setting policy, approving annual budgets, and monitoring quarterly budget performance. The president of GCC reports to the board of trustees and is the administrative head of the college.

GCC 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. GCC's main campus is at 1 College Drive in Greenfield, and it has an additional location at 270 Main Street in Greenfield. Enrollment for the fall 2016 semester consisted of 655 full-time and 1,302 part-time students.

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 Greenfield Community College (GCC) for the period July 1, 2015 through June 30, 2017.

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. Has GCC developed an emergency evacuation plan that takes into account the needs of students with various disabilities and made it known to all relevant parties?	No; see Finding 1
2. Has GCC taken appropriate measures to ensure that students with disabilities have timely and user-friendly access to supplemental learning aids, services, and alternative testing formats?	Yes
3. Does GCC periodically examine all existing policies, practices, and facilities for admissions, student support, and other aspects of student life to ensure that they do not have a disparate impact on qualified students with disabilities?	Yes

To achieve our objectives, we gained an understanding of the internal control environment at GCC and evaluated the design of controls over the emergency evacuation training process, the disability accommodation process, and the policy and procedure review process that we deemed significant to our audit objectives.

We obtained and tested data from the Disability Services Database for students who received disability accommodations. To test the reliability of these data, we reviewed existing information security plans and policies, tested user access controls, and interviewed knowledgeable officials about the student data. Additionally, we traced a sample of student disability accommodations from the information

system to source documents. Based on these procedures, we determined that the data obtained from the Disability Services Database were sufficiently reliable for the purposes of this report.

We reviewed the emergency evacuation plan to determine whether it took into account the needs of students with disabilities and was distributed to all GCC faculty members and students. We interviewed four GCC faculty members to determine whether they were aware of their role in an evacuation.

To determine whether GCC properly provided disability accommodations to students, we selected a nonstatistical random sample of 60 out of 468 students who received disability accommodations during the audit period. We reviewed student files, which included Accommodation Agreements, Voluntary Statements of Learning Needs, and Equipment / Learning Aid Agreements (if applicable). Because this sample was nonstatistical, we could not project the results of the test to the entire population.

We interviewed GCC's Wellness Center¹ coordinator to determine whether policies, practices, and facilities for admissions, student support, and other aspects of student life were periodically reviewed. We also reviewed meeting minutes from the board of trustees, finance committee, and president's staff to determine whether this review occurred.

1. GCC's Wellness Center houses its Office of Disability Services, which ensures that students covered under the Americans with Disabilities Act of 1990 receive academic accommodations that address their needs.

DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

1. Greenfield Community College did not have an emergency evacuation plan that took into account students with disabilities.

During our audit period, Greenfield Community College (GCC) did not have an emergency evacuation plan that took into account the needs of students with disabilities. Although the college had an emergency evacuation plan that discussed assisting students in need, it did not specifically discuss how to assist students with disabilities. This places the health and wellbeing of these students at risk.

Authoritative Guidance

Section 35.130(b)(7) of the Americans with Disabilities Act of 1990 (ADA) Title II Regulations states,

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability.

Additionally, according to Section II-8.2000 of the ADA Title II Technical Assistance Manual, published by the US Department of Justice, all public entities, including community colleges, are expected to ensure that their current policies and practices do not exclude individuals with disabilities from their programs, activities, and services:

A review should be made of the procedures to evacuate individuals with disabilities during an emergency. This may require . . . special procedures for assisting individuals with disabilities from a facility during an emergency.

Establishing specific procedures for how to properly notify students with mobility, vision, or hearing issues and/or other disabilities of emergency situations, and how to properly assist these students in emergency evacuations, is consistent with the purposes of the ADA and therefore a best practice.

Reasons for Issue

GCC officials stated that the college had overlooked the requirement to address the needs of its students with disabilities in its emergency evacuation plan.

Recommendation

GCC should take the measures necessary to ensure that it complies with all of the requirements of the ADA and with its own newly created procedures for the emergency evacuation of students with disabilities.

Auditee's Response

The College recognized that the emergency evacuation plan in place at the time of review was incomplete with regard to providing explicit directions regarding the emergency evacuation of students with mobility, vision, hearing, and/or other disabilities and steps to revise the plan were underway. Since meeting with the auditors, the College has taken additional steps to address the noted deficiencies by updating of the emergency procedures page on the Public Safety web page to provide evacuation instructions for people with disabilities. . . . Additionally, the information is replicated on the Disability Services web pages. . . . Finally, the College has incorporated a link to the . . . instructions titled "Emergency Procedures" in the footer of every page on our web site.