



Board of Trustees

Audit Committee

12:30 p.m.

April 27, 2022

Loughman Living Room, Scanlon Hall

A live stream of the meeting for public viewing will also take place on YouTube at the following link: <https://www.westfield.ma.edu/live>.

For information about Westfield State's COVID-19 procedures, visit: <https://www.westfield.ma.edu/spring-2022covid/faq>

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|---|---------------------------------|
| 1. Called to Order | Trustee Boudreau |
| 2. Minutes | |
| a. February 17, 2022 | Trustee Boudreau |
| 3. President's Remarks | President Thompson |
| 4. Items for Information | |
| a. HEERF Auditing Requirements | O'Connor and Drew/Lisa Freeman |
| 5. Items for Discussion | |
| a. Annual Review of Audit Committee Charter | Trustee Boudreau |
| b. Risk Management/Internal Audit | Trustee Boudreau/Stephen Taksar |
| 6. Items for Action | |
| a. Motion – Uniform Guidance Report | O'Connor and Drew |
| b. Motion – Engagement of Financial Audit Services for FY22 | Lisa Freeman |

Attachment(s):

- a. Minutes 2-17-2022 (Draft)
- b. HEERF Auditing Requirements
- c. Annual Review of Audit Committee Charter
- d. Motion – Uniform Guidance Report
- e. Uniform Guidance Report (Draft)
- f. Motion – Engagement of Financial Audit Services for FY22
- g. Engagement of Financial Audit Services for FY22 (Planning Presentation)
- h. Engagement of Financial Audit Services for FY22 (Engagement Letter)



BOARD OF TRUSTEES

Audit Committee

February 17, 2022

Minutes

Loughman Living Room, Scanlon Hall

And via Zoom in accordance with Massachusetts Gov. Charlie Baker's Executive Order Suspending Certain Provisions of the Open Meeting Law, G.L. c. 30A, § 20 dated March 12, 2020.

A live stream of the meeting for public viewing also took place on YouTube.

MEMBERS PRESENT: Vice Chair William Reichelt (joined the meeting at 1:33 PM), Secretary Dr. Gloria Williams, and Trustee Melissa Alvarado

MEMBERS PARTICIPATING REMOTELY: Committee Chair Paul Boudreau

TRUSTEE GUESTS PRESENT: Trustees Dr. Robert Martin and Ali Salehi

TRUSTEE GUESTS PARTICIPATING REMOTELY: Trustee Landrau

Dr. Linda Thompson, President of Westfield State University, was also present.

The meeting was called to order at 1:31 AM by Committee Chair Boudreau and a roll call was taken of the committee members participating as listed above. It was announced that the meeting is being livestreamed and captured as recorded.

MOTION made by Trustee Williams, seconded by Trustee Alvarado, to approve the minutes of the December 16, 2021 meeting.

There being no discussion, **ROLL CALL VOTE** taken:

Trustee Alvarado	Yes
Trustee Reichelt	not yet in meeting
Trustee Williams	Yes
Trustee Boudreau	Yes

Motion passed unanimously.

President's Remarks. President Thompson stated she did not have remarks for this meeting.

Acceptable Use of Information Technology Resources Policy (0380). This policy is being brought to the Board as mostly an informational item. Some of the terminology has been changed to current standards and some responsibilities have moved from other departments. This policy is reviewed annually instead of every three years.

Public Safety Policy Overview. A brief overview of orders followed in Public Safety was shared, which have a significant impact on how incidents are responded to on campus. General Orders (like standard operating procedures) come from the International Association of Campus Law Enforcement Administrators (IACLEA) 215 standards. A Department Operations Plan is followed and allows all agencies involved in an event on campus to function as one group for risk management and liability. All agencies that come on campus get a copy of the Plan. Examples of such events are Red Sox and Patriots celebrations, commencement, and other large events. Because the Board oversees policies and risks, it is important to understand how Public Safety operates and the relationship between General Order structure and oversight of University policies. Public Safety is in the process of becoming IACLEA accredited.

Uniform Guidance Audit Update. The Uniform Guidance Audit is still in process with O'Connor and Drew. A draft report is scheduled to be presented at the April 27 meeting with an expected review of HEERF funding and compliance. The federal due date is September 30.

Risk Management/Internal Audit. A Title IX coordinator has been hired who has already trained the Board and Cabinet. An investigator has also been hired to support required campus investigations. These have been two important hires in the last five months. Hiring a risk manager is still on the list to do once funding is available.

Motion – Electronic Mail Policy (0550). This policy was revised with the assistance of Human Resources, Marketing, and Student Affairs. Some information was removed from the policy and put into guidelines to bring it in line with other policies through Administration and Finance. Information was added on phishing, social media, and email guidelines as well as the authority to enforce policies and restrict downloads from our networks. The response time is approximately 15 minutes after being notified of a phishing email.

MOTION made by Trustee Reichelt, seconded by Trustee Alvarado, to approve the changes and accept the newly revised Electronic Mail Policy (0550), as presented.

There being no discussion, **ROLL CALL VOTE** taken:

Trustee Alvarado	Yes
Trustee Reichelt	Yes
Trustee Williams	Yes
Trustee Boudreau	Yes

Motion passed unanimously.

There being no other business, **MOTION** made by Trustee Williams, seconded by Trustee Reichelt, to adjourn.

There being no discussion, **ROLL CALL VOTE** taken:

Trustee Alvarado	Yes
Trustee Reichelt	Yes
Trustee Williams	Yes
Trustee Boudreau	Yes

Motion passed unanimously.

Meeting adjourned at 1:58 PM.

Attachments presented at this meeting:

- a. Minutes 12-16-21 (Draft)
- b. Acceptable Use of Information Technology Resources Policy (Track Changes)
- c. Public Safety Policy Overview (Memo)
- d. Motion – Electronic Mail Policy
- e. Electronic Mail Policy (No Track Changes)
- f. Electronic Mail Policy (Track Changes)
- g. Electronic Mail Policy (Distribution List Guidelines)
- h. Electronic Mail Policy (Social Media Guidelines)

Secretary's Certificate

I hereby certify that the foregoing is a true and correct copy of the approved minutes of the Westfield State University Board of Trustees Audit Committee meeting held on February 17, 2021.

Dr. Gloria Williams, Secretary

Date

DRAFT



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

March 23, 2022

RE: Second Year Higher Education Emergency Relief Fund (HEERF) Auditing Requirements

Dear HEERF Grantee:

The purpose of this letter is to provide an overview of the Higher Education Emergency Relief Fund (HEERF) grant program auditing requirements for the second year of the HEERF program.¹ Auditing requirements for the HEERF grant fund fall into two categories—those public and private nonprofit institutions that may be required to submit an audit under the Single Audit Act Amendments of 1996 (Single Audit Act) and those audits that proprietary institutions are specifically required to submit under the HEERF program if certain conditions are met.

Audits form a critical component of the Federal Government’s proper oversight of grant programs generally, and of the disaster relief provided during the novel coronavirus (COVID-19) pandemic specifically. Quality audits are reliable and effective tools to improve the integrity and effectiveness of the Department programs and help reassure the American public, the Congress, and the Department’s Office of the Inspector General (OIG) that taxpayer dollars are used efficiently and effectively.

Single Audits of Public and Private Nonprofit Institutions

Who must obtain an audit?

Any non-Federal entity, including private nonprofit and public institutions, that expends \$750,000 or more during the non-Federal entity’s fiscal year in Federal awards, including student financial assistance under Title IV of the Higher Education Act of 1965, as amended (Title IV) and HEERF, must have a single audit conducted in accordance with [2 CFR part 200 Subpart F Audit Requirements](#).

A non-Federal entity that expends less than \$750,000 in Federal awards during the non-Federal entity’s fiscal year is exempt from Federal single audit requirements for that year, except as noted in [2 CFR § 200.503](#), but records must be available for review or audit by appropriate

¹ Please note this letter applies to HEERF grant funds provided under Coronavirus Aid, Relief, and Economic Security (CARES) Act (HEERF I), the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA) (HEERF II), and HEERF grant funds provided under the American Rescue Plan Act of 2021 (ARP) (HEERF III).

officials of the Federal agency, pass-through entity, and Government Accountability Office (GAO).

Regardless of the need to submit an audit, all financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the last HEERF grant’s final expenditure report as required by [2 CFR § 200.334](#).

What must be audited?

Auditors must evaluate assistance listing (ALN) 84.425 – Education Stabilization Fund in its entirety to determine if it meets the requirements to be audited as a major Federal program. The separate grant types or subprograms (including HEERF), which were distributed using alpha characters at the end of the assistance listing number, are not considered separate programs for major program purposes.

New Update for FY21: Auditors of private nonprofit and public institutions must use a risk-based approach, in accordance with [2 CFR § 200.518](#) and [2 CFR § 200.519](#), to determine which Federal programs are audited as major programs during a single audit. Importantly, for single audits subject to the 2021 Compliance Supplement², the Department has designated the Education Stabilization Fund as a “**higher risk program**” which requires auditors to consider several factors before declining to include the program as a major Federal program in the single audit. More information on the “higher risk” designation is available in the 2021 Compliance Supplement in Appendix IV. Based on the Department’s interpretation of the instructions provided in Appendix IV, an institution’s Education Stabilization Fund program must be audited as a major Federal program when it is considered a Type A program (a large program) because the Education Stabilization Fund program is 100% COVID-19 funding and therefore cannot qualify as a low-risk Type A program with the “higher risk” designation. Auditors should prepare audit documentation supporting risk considerations and conclusions for the Education Stabilization Fund program.

The Compliance Supplement is a document that identifies existing, important compliance requirements that the Federal government expects to be considered as part of a single audit, as well as audit objectives and suggested audit procedures for determining compliance with these requirements. The 2021 Compliance Supplement is available [here](#). Program objectives, program procedures, and compliance requirements specific to the Education Stabilization Fund and HEERF grant program can be found beginning on page 4-84.425-ESF-1 (PDF page 1097).

How can we pay for this audit?

Under [2 CFR § 200.425](#), private nonprofit and public institutions may use a reasonably proportionate share of the costs of audits required by, and performed in accordance with, the

² The 2021 Compliance Supplement is effective for audits of fiscal years beginning after June 30, 2020, and will be superseded by the 2022 Compliance Supplement, effective for audits of fiscal years beginning after June 30, 2021.

Single Audit Act. That is, if an institution is submitting a single audit of multiple Federal programs, it should reasonably distribute the costs of the single audit among the audited programs.

Because of the nature of the Student Aid Portion grants (assistance listing 84.425E), no audit costs may be charged to that program as that grant program may be used only to provide financial aid grants to students.

Where is the audit submitted?

Single Audits by private nonprofit and public institutions are submitted via the [Federal Audit Clearinghouse](#) (FAC) system. The FAC provides access information and technical support in using their system to submit your single audit. For more information, please see [their FAQs here](#) and [instructions here](#), or contact them at either 1-866-306-8779 or govs.fac.ides@census.gov.³

Submissions must include cover form SF-SAC (Data Collection Form for Reporting on Audits of States, Local Governments, Indian tribes and Tribal organizations, Institutions of Higher Education, and Non-profit Organizations), OMB Control Number 0607-0518. More information regarding this cover form [is available here](#).

When must we submit an audit?

Single audit report submission requirements are described in 2 CFR § 200.512 and generally require single audit report packages to be submitted within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period. Under OMB memorandum [M-21-20](#), institutions with fiscal year ends through June 30, 2021, were allowed to delay the completion and submission of their single audit reporting packages up to six (6) months beyond the normal due date.

Where can we find more information?

More information regarding Single Audits is available at the OIG's [Single Audit webpage here](#).

Compliance Audits of Proprietary Institutions

Who must obtain an audit?

Any proprietary institution that either (1) expended \$500,000 or more in HEERF grant funds during an institution's fiscal year⁴, (2) was on Federal Student Aid's (FSA's) [Heightened Cash](#)

³ Please note that the Department also requires institutions receiving Title IV program funds to submit via [FSA's eZAudit system](#).

⁴ This includes both the Student Aid Portion and Institutional Portion of CARES Act funding provided to propriety institutions under assistance listings (ALN) 84.425E and 84.425F as well as the Proprietary Institutions Grant Funds for Students program under assistance listing 84.425Q.

Monitoring (HCM) 1 or 2 lists in an institution's fiscal year in which it expended any HEERF grant funds, or (3) expects to close or has closed⁵ must submit a compliance audit covering the institution's administration of the entire HEERF grant program to the Department. The HEERF compliance audit must be conducted in accordance with Government Auditing Standards, issued by the Comptroller General of the United States, and the applicable audit guide developed by the Department of Education's OIG.

A proprietary institution that expended less than \$500,000 in HEERF grant funds during an institution's fiscal year and is not otherwise on HCM 1 or HCM 2 list during an institution's fiscal year in which it expended any HEERF grant funds is exempt from this HEERF compliance audit requirement for that year, but the grant records must remain available for review or audit by authorized officials of the Department.

The Department has been working with proprietary institutions that we believe may be required to submit a HEERF proprietary audit and have been following up appropriately. Please note that proprietary institutions may be asked by the Department to establish to the Department's satisfaction that they expended less than \$500,000 in HEERF grant funds during an institution's fiscal year.

Regardless of the need to submit an audit, all financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the last HEERF grant's final expenditure report as required by [2 CFR § 200.334](#).

What must be audited?

OIG's audit guide, [Guide for Compliance Attestation Engagements of Proprietary Schools Expending Higher Education Emergency Relief Fund Grants](#) (HEERF Audit Guide), provides the requirements and guidance to satisfy the HEERF compliance audit requirement. To satisfy the HEERF compliance audit requirement, this HEERF Audit Guide requires an examination-level attestation engagement. The compliance requirements identified as being subject to audit in the HEERF Audit Guide will generally be the same as those identified in the HEERF section of the 2021 Compliance Supplement addendum.

Since FSA already requires an annual audit of all proprietary schools that participate in the Title IV programs, to the extent practicable, the annual Title IV audit may be used to cover certain areas of the HEERF audit if separately auditing those areas would be duplicative.

⁵ As a reminder, institutions are under a continuing affirmative duty as a condition of their HEERF Supplemental Agreements and Certification & Agreements to inform the Department if the institution is to close or terminate operations as an institution or merge with another institution.

How can we pay for this audit?

Like private nonprofit and public institutions, proprietary institutions may use a reasonably proportionate share of the reasonable costs associated with implementation of this audit requirement.

Because of the nature of the Student Aid Portion grant (assistance listing 84.425E) and Proprietary Institutions Grant Funds for Students (assistance listing 84.425Q), no audit costs may be charged to those programs as those grant programs may be used only to provide financial aid grants to students.

Where is the audit submitted?

This audit will be submitted via [FSA's eZ-Audit System](#), the same system that is already used to submit the annual Title IV audit. Specific instructions on where and how to submit your audit are included in the [HEERF Audit Guide](#).

When must we submit an audit?

The audit report package for the FY 2021 compliance attestation engagements must be submitted within six months of the end of the institution's fiscal year, which is the same submission deadline for the institution's annual Title IV audit, as established by [34 CFR § 668.23\(a\)\(4\)](#).

Where can we find more information?

More information regarding proprietary institution auditing will be available at the OIG's [Proprietary Schools, Foreign Schools, and Third-Party Servicer Audits webpage here](#).

General Requirements and Information – All HEERF Grantees

Who can we contact for more information?

Please reach out to the following for more information:

- For technical support or information on submitting a single audit via the [Federal Audit Clearinghouse](#) (FAC) system: 1-866-306-8779 or govs.fac.ides@census.gov.
- For general inquiries about the HEERF program: HEERF@ed.gov.
- For technical assistance related to performing the audit or attestation engagement: aignon-Federalaudit@ed.gov.

Thank you for all the work you are doing on behalf of our nation's students during this challenging time and for your prompt attention to this matter.

Sincerely,

Michelle Asha Cooper, Ph.D.

Deputy Assistant Secretary for Higher Education Programs

Delegated the Authority to Perform the Functions and Duties of the Assistant Secretary
Office of Postsecondary Education

AUDIT COMMITTEE OF THE BOARD OF TRUSTEES OF WESTFIELD STATE UNIVERSITY CHARTER

I. STATEMENT OF POLICY

The primary function of the Audit Committee of Westfield State University (the "University") is to oversee the accounting and financial reporting processes of the University, audits of the University's financial statements, reports and records, and risk management systems. In addition, the Audit Committee must provide assistance to the University's Board of Trustees (the "Board") in fulfilling its responsibilities to the University's students, parents, faculty, donors and staff as to the University's accounting, auditing and reporting practices and controls. In so doing, it is the responsibility of the Audit Committee to maintain free and open means of communication among the Board, independent auditors, internal auditors and members of the senior administration of the University.

II. COMPOSITION OF THE AUDIT COMMITTEE

Per Westfield State University Board of Trustee By-laws, Section 7.A., the Audit Committee shall consist of at least three voting trustees; provided however, that no more than one committee member may also be a member of the Finance and Capital Assets Committee. In no case may a trustee serve on the committee for more than three consecutive years.

The Audit Committee chairperson shall be appointed by the Chairman of the Board and confirmed by the majority vote of the Board members. If an Audit Committee chairperson is not designated or present at a meeting, the members of the Audit Committee may designate a chairperson by a majority vote of the Audit Committee membership.

III. MEETINGS

The Audit Committee shall meet at least four (4) times a year or more frequently as circumstances require. The Audit Committee shall maintain minutes of each meeting of the Audit Committee and shall report the significant actions of the Audit Committee to the Board, with such recommendations as the Audit Committee deems appropriate.

IV. RESPONSIBILITIES AND DUTIES OF THE AUDIT COMMITTEE

The primary duties and responsibilities of the Audit Committee are to oversee and monitor the University's financial reporting process, internal controls and risk

Westfield State University

Policy concerning:

APPROVED: December 2014

Section Administrative

Number 0460

Page 2 of 4

REVIEWED: April 2021

management systems and review and evaluate the performance of the University's independent auditors. The Audit Committee will also evaluate the performance of the unit's internal auditing staff as it directly relates to internal audit functions. In fulfilling these duties and responsibilities, the Audit Committee shall take the following actions, in addition to performing such functions as may be assigned by law or regulation, or the Board:

1. The Audit Committee shall review and reassess this Charter annually and recommend any proposed changes to the Board for approval.
2. The Audit Committee shall be directly responsible for the appointment, compensation, retention and oversight of the work of any independent auditor engaged (including resolution of disagreements between administration and the auditor regarding financial reporting) for the purpose of preparing or issuing an audit report or performing other audit, review or attest services for the University. The independent auditor must report directly to the Audit Committee.
3. The Audit Committee shall act as a liaison with University administration and staff and the independent external auditor to develop an annual audit plan and schedule.
4. The Audit Committee, in its capacity as a committee of the Board, shall determine, and the University shall provide, providing the Board has approved the expenditure of funds for such engagements, funding for payment of: (i) compensation to any registered public accounting firm engaged for the purpose of preparing or issuing an audit report or performing other audit, review or attest services for the University; (ii) compensation to any advisers, including, without limitation, an independent financial expert, employed by the Audit Committee, and as permitted by this Charter; and (iii) ordinary and reasonable administrative expenses of the Audit Committee that are necessary or appropriate in carrying out its duties.
5. As part of the audit process, the Audit Committee shall meet with the independent auditors to discuss and determine the scope of the audit. The Audit Committee shall determine that the independent audit team engaged to perform the external audit consists of competent, experienced, auditing professionals.
6. The Audit Committee shall require the independent auditors to submit, on an annual basis, a formal written statement setting forth all relationships between the independent auditors and the University that may affect the objectivity and independence of the independent auditors, consistent with Independence Standards Board Standard No. 1, and the Audit Committee shall actively engage in a dialogue with the independent auditors with respect to any disclosed

relationships or services that may impact the objectivity and independence of the independent auditors. The Audit Committee shall take, or recommend that the full Board take, appropriate action to ensure the independence of the independent auditors.

7. The Audit Committee shall require the independent auditors to advise the University of any fact or circumstance that might adversely affect the outside auditors' independence or judgment with respect to the University under applicable auditing standards, including any significant changes to the University's accounting principles and any items required to be communicated by the independent auditor under prevailing audit standards.
8. The Audit Committee shall require the independent auditors to advise the University if it becomes aware that any officer or employee of the University, or its direct or indirect subsidiaries or affiliates, is related to a partner, employee or other representative of the independent auditors, to the extent that such relationship might adversely affect the University under applicable auditing standards.
9. Upon the completion of the annual audit, the Audit Committee shall review the audit findings, including any comments or recommendations of the independent auditors, with the entire Board and obtain the approval of such report from the Board. The Audit Committee shall report to the Board on any issues which may be unresolved.
10. The Audit Committee shall review the regulations and current audit trends and requirements and recommend appropriate policy and practice applications to University administration.
11. The Audit Committee shall meet at least annually with the University's internal auditor to assure itself that the University has a strong internal auditing function by reviewing the internal audit program and assessing (grading) risk areas along with a proper control environment that promotes accuracy and efficiency in the University's operations.
12. The Audit Committee shall receive reports from the University's internal auditor, which include a summary of findings from completed internal audits and a progress report on the internal audit plan, together with explanations for any deviations from the original plan.
13. The Audit Committee shall review the internal audit function of the University, including the independence and authority of its reporting obligations, the

proposed audit plans for the coming year and the coordination of such plans with the independent auditors.

14. The Audit Committee shall recommend, with consultation from the University's leadership, the appointment, replacement, reassignment or dismissal of the University's internal auditor as may be warranted.
15. The Audit Committee shall determine, with consultation from the University's leadership, whether the internal audit function may be performed by a staff internal auditor or may be outsourced to a third party, as deemed appropriate.
16. The Audit Committee shall consider and review with the University's administration and the internal auditor: (a) significant findings during the year and management's responses thereto, including the status of previous audit recommendations, (b) any difficulties encountered in the course of their audits, including any restrictions on the scope of activities or access to required information, (c) any changes required in the planned scope of the internal audit plan; and (d) the internal auditing department budget and staffing.
17. The Audit Committee shall investigate or consider such other matters within the scope of its responsibilities and duties as the Audit Committee may, in its discretion, determine to be advisable. The Audit Committee shall have the authority to engage independent counsel and other advisers or experts, as it deems necessary to carry out its duties.
18. The Audit Committee shall prepare any report required by any governmental body or to the public, if any, as required by laws of the Commonwealth of Massachusetts and any/all regulations promulgated thereunder.
19. The Audit Committee shall establish procedures for the confidential, anonymous submission by University staff and administration of concerns regarding questionable accounting or auditing matters.
20. The Audit Committee shall at all times cooperate with all state auditors and provide any/all reports, statements, minutes and other related documents as may be required by such auditors.

REVIEW

This policy shall be reviewed every year by the Board of Trustees Audit Committee Chair and the Vice President for Administration and Finance, prior to June 30th.



Board of Trustees

April 27, 2022

MOTION

To accept the audit report on the audit procedures required pursuant to the Office of Management and Budget (OMB) Uniform Guidance for fiscal year ending June 30, 2021, as prepared by the firm of O'Connor & Drew P.C., and to authorize the submission of this report to the Federal Audit Clearinghouse and to other parties as required by OMB Uniform Guidance and the Commonwealth of Massachusetts.

Robert A. Martin, Ph.D., Chair

Date

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

**INDEPENDENT AUDITORS' REPORTS AS REQUIRED
BY THE UNIFORM GUIDANCE AND *GOVERNMENT*
AUDITING STANDARDS AND RELATED
INFORMATION**

JUNE 30, 2021

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

**Independent Auditors' Reports as Required by the Uniform Guidance and
Government Auditing Standards and Related Information**

June 30, 2021

C O N T E N T S

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INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE

To the Board of Trustees of
Westfield State University
Westfield, Massachusetts

Report on Compliance for Each Major Federal Program

We have audited Westfield State University's (an Agency of the Commonwealth of Massachusetts) (the "University") compliance with the types of compliance requirements described in the *U.S. Office of Management and Budget ("OMB") Compliance Supplement* that could have a direct and material effect on each of the University's major federal programs for the year ended June 30, 2021. The University's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditors' Responsibility

Our responsibility is to express an opinion on compliance for each of the University's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (the "Uniform Guidance"). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the University's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the University's compliance.

Opinion on Each Major Federal Program

In our opinion, the University complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2021.

Report on Internal Control over Compliance

Management of the University is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the University's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the University's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Schedule of Expenditures of Federal Awards

We have audited the financial statements of the University, as of and for the year ended June 30, 2021. We issued our report thereon dated October 13, 2021, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

**Certified Public Accountants
Braintree, Massachusetts**

DATE

(except for the Schedule of Expenditures of Federal Awards, for which the date is October 13, 2021)

INDEPENDENT AUDITORS' 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*

To the Board of Trustees of
Westfield State University
Westfield, Massachusetts

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Westfield State University (the "University"), which comprise the statement of net position as of June 30, 2021, the related statements of revenues, expenses and changes in net position and cash flows for the year then ended, and the related notes to the financial statements, which collectively comprise the University's basic financial statements and have issued our report thereon dated October 13, 2021.

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 the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the 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 entity'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 may exist that have not been identified.

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.

**Certified Public Accountants
Braintree, Massachusetts**

October 13, 2021

Draft

**SCHEDULE OF EXPENDITURES
OF FEDERAL AWARDS**

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Schedule of Expenditures of Federal Awards

For the Year Ended June 30, 2021

	Assistance Listing Number	Pass-Through Entity	Pass-Through Entity Award Number	Federal Expenditures	Through to Subrecipients
STUDENT FINANCIAL ASSISTANCE CLUSTER					
U.S. Department of Education:					
Direct Awards:					
Federal Supplemental Educational Opportunity Grant	84.007	N/A	N/A	\$ 391,448	\$ -
Federal Work-Study Program	84.033	N/A	N/A	280,913	-
Federal Pell Grant Program	84.063	N/A	N/A	6,577,126	-
Federal Perkins Loan Program (beginning of year)	84.038	N/A	N/A	344,129	-
Federal Perkins Loan Program (current year expenditures)	84.038	N/A	N/A	-	-
William D. Ford Federal Direct Loan Program (Note 4)	84.268	N/A	N/A	27,231,701	-
				<u>34,825,317</u>	<u>-</u>
Total Student Financial Assistance Cluster				<u>34,825,317</u>	<u>-</u>
TRIO CLUSTER					
U.S. Department of Education:					
Direct Awards:					
Student Support Services	84.042	N/A	N/A	281,671	-
				<u>281,671</u>	<u>-</u>
RESEARCH AND DEVELOPMENT CLUSTER					
National Science Foundation:					
Pass-through Awards:					
Education and Human Resources	47.076	California Polytechnic State University	1525058	10,222	-
Education and Human Resources	47.076	University of Nebraska at Omaha	1925188	1,366	-
				<u>11,588</u>	<u>-</u>
Total Research and Development Cluster				<u>11,588</u>	<u>-</u>
NON-CLUSTER					
Library of Congress					
Pass-through Awards:					
Teaching with Primary Sources Eastern Region	42.010	Waynesburg University	GA08C0016	19,999	-
U.S. Department of Health and Human Services:					
Direct Awards:					
Mental and Behavioral Health Education and Training	93.732	N/A	N/A	449,189	-
U.S. Department of Education:					
Direct Awards:					
COVID-19 -Higher Education Emergency Relief Fund (HEERF) - Student Aid Portio	84.425E	N/A	N/A	2,275,932	-
COVID-19 -Higher Education Emergency Relief Fund (HEERF) - Institutional Portio	84.425F	N/A	N/A	5,315,593	-
COVID-19 -Higher Education Emergency Relief Fund (HEERF) - SI	84.425M	N/A	N/A	532,638	-
				<u>8,124,163</u>	<u>-</u>
Total Direct Awards				<u>8,124,163</u>	<u>-</u>
Pass-through Awards:					
COVID-19 -Higher Education Emergency Relief Fund (HEERF) - GEEI	84.425C	Massachusetts Department of Education	ISARGT70092020WSC21A	318,325	-
				<u>318,325</u>	<u>-</u>
Total U.S. Department of Education				<u>8,442,488</u>	<u>-</u>
U.S. Department of the Interior					
Direct Awards:					
National Wild & Scenic Rivers System	15.962	N/A	N/A	91,528	-
				<u>91,528</u>	<u>-</u>
Total Non-Cluster				<u>9,003,204</u>	<u>-</u>
				<u>\$ 44,121,780</u>	<u>\$ -</u>

See accompanying notes to the Schedule of Expenditures of Federal Awards.

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Notes to the Schedule of Expenditures of Federal Awards

Year Ended June 30, 2021

Note 1 - **Basis of Presentation**

The accompanying Schedule of Expenditures of Federal Awards (the “Schedule”) includes the federal award activity of Westfield State University (the “University”) under programs of the Federal Government for the year ended June 30, 2021. The information on this Schedule is prepared in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (“Uniform Guidance”). Because the Schedule presents only a selected portion of the operations of the University, it is not intended to and does not present the financial position, changes in net position or cash flows of the University.

Note 2 - **Summary of Significant Accounting Policies**

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance.

Note 3 - **Indirect Cost Rate**

The University has elected not to use the 10-percent de minimis indirect cost rate as allowed under the Uniform Guidance.

Note 4 - **Federal Student Loan Programs**

Perkins Loan Program

The Federal Perkins Loan Program (“Perkins”) is administered directly by the University and balances and transactions relating to this program are included in the University’s basic financial statements. During the year ended June 30, 2021, there were no loans advanced under the Perkins program. During the year ended June 30, 2021, \$16,058 of administrative costs were incurred. As of June 30, 2021, loan balances receivable, net under Perkins was \$253,679.

There was no federal capital contribution or match by the University during the current year.

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Notes to the Schedule of Expenditures of Federal Awards - Continued

Year Ended June 30, 2021

Note 4 - **Federal Student Loan Programs - Continued**

Direct Student Loan Program

The University disbursed \$27,231,701 of loans under the Federal Direct Student Loans program, which include Stafford Subsidized and Unsubsidized Loans and Parent Plus Loans. It is not practical to determine the balances of the loans outstanding to students of the University under the program as of June 30, 2021. The University is only responsible for the performance of certain administrative duties and, accordingly, these loans are not included in the University's financial statements.

Draft

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Schedule of Findings and Questioned Costs

Year Ended June 30, 2021

Section I – Summary of Auditors’ Results:

Financial Statements

Type of auditors’ report issued: Unmodified

Internal control over financial reporting:

- Material weaknesses identified? _____ yes x no
- Significant deficiencies identified that are not considered to be material weaknesses? _____ yes x no

Noncompliance material to the financial statements noted? _____ yes x no

Federal Awards

Type of auditors’ report issued on compliance for major programs: Unmodified

Internal control over major programs:

- Material weaknesses identified? _____ yes x no
- Significant deficiencies identified that are not considered to be material weaknesses? _____ yes x no

Any audit findings disclosed that are required to be reported in accordance with the Uniform Guidance? _____ yes x no

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2021

Identification of Major Programs

Name of Federal Program or Cluster	Assistance Listing Number
Student Financial Assistance Cluster	
Federal Supplemental Educational Opportunity Grant Program	84.007
Federal Work-Study Program	84.033
Federal Perkins Loan Program (Note 4)	84.038
Federal Pell Grant Program	84.063
Federal Direct Student Loans (Note 4)	84.268
Trio Cluster	
Student Support Services	84.042
Education Stabilization Fund (ESF):	
CARES Act Higher Education Emergency Relief Fund - Students	84.425E
CARES Act Higher Education Emergency Relief Fund – Institutional	84.425F
CARES Act Higher Education Emergency Relief Fund – Strengthening Institutions Program (SIP)	84.425M
COVID-19 -Higher Education Emergency Relief Fund (HEERF) - GEER	84.425C

Dollar threshold used to distinguish between
type A and type B programs:

\$750,000

Auditee qualified as a low-risk auditee?

 x yes no

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2021

Section II – Financial Statement Findings:

None

Draft

WESTFIELD STATE UNIVERSITY
(an Agency of the Commonwealth of Massachusetts)

Schedule of Findings and Questioned Costs - Continued

Year Ended June 30, 2021

Section III – Federal Award Findings and Questioned Costs:

None

Draft

ADMINISTRATION AND FINANCE

Management's Summary Schedule of Prior Audit Finding

Year Ended June 30, 2020

Finding number: 2020-001
Federal agency: U.S. Department of Education
Programs: Student Financial Assistance Cluster
Assistance Listing Number: 84.063 and 84.268
Award year: 2020

Condition

The Federal Government requires the University to report student enrollment changes to the National Student Loan Data System ("NSLDS") within 60 days. During our testing, we noted three students, out of a sample of 40, that had incorrect effective dates reported to NSLDS. Also, during our testing, we noted one student, out of a sample of 40, that was reported to NSLDS two days beyond the required timeframe.

Current Year Status

Corrective action was taken during the year.

ADMINISTRATION AND FINANCE

Management's Summary Schedule of Prior Audit Finding

Year Ended June 30, 2020

Finding number: 2020-002
Federal agency: U.S. Department of Education
Programs: Higher Education Emergency Relief Fund
Assistance Listing Number: 84.425E
Award year: 2020

Condition

The Student Financial Aid Office is responsible for awarding student emergency grants in accordance with the University's documented distribution plan. During our testing, we noted one student expenditure out of a sample of 39 total student and institutional expenditures, who received a student emergency grant of \$500 instead of the \$400, as prescribed by the University's documented student distribution plan.

Current Year Status

Corrective action was taken during the year.



Board of Trustees

April 27, 2022

MOTION

To engage the financial audit services of O'Connor and Drew P.C., for FY22.

Robert A. Martin, Ph.D., Chair

Date

Westfield State University

Audit Committee Meeting
April 27, 2022



25 Braintree Hill Office Park, Suite 102
Braintree, MA 02184
617.471.1120

Audit Staff

- David A. Dilulis, CPA, Engagement Partner
- Steven Cohen, CPA, Quality Control Director
- Zachary Laflash, CPA, Audit Partner
- Ryan Sheehan, CPA, Audit Manager
- Lauren Carnes, CPA, Tax Partner
- Michael Hammond, IT Director

Audit Responsibilities

- Our Responsibilities Include:
 - ❑ Forming and expressing an opinion on the fairness of the financial statements
 - ❑ Communicating significant matters related to the audit engagement
 - ❑ Forming and expressing an opinion on the supplementary information
 - ❑ Reporting under Government Auditing Standards
 - ❑ Reporting on compliance and internal control over compliance related to major federal programs (SFA)

(Note: a complete list of responsibilities is included within the engagement letter)

Audit Responsibilities

- Those Charged with Governance Responsibilities Include:
 - ❑ Overseeing the financial reporting process
 - ❑ Overseeing the strategic direction of the University
 - ❑ Appointing the auditors and overseeing our work
 - ❑ Informing us of all known or suspected fraud involving the University
 - ❑ Resolving disagreements between management and the audit team

Audit Responsibilities

- Management's Responsibilities Include:
 - ❑ Making all management decisions
 - ❑ Preparing and presenting financial statements in conformity with U.S. GAAP
 - ❑ Allowing us access to all financial records
 - ❑ Selecting and applying appropriate accounting policies
 - ❑ Safeguarding of all assets
 - ❑ Adjusting financial statements to correct material misstatements
 - ❑ Complying with laws and regulations, contracts, agreements, and grants
 - ❑ Providing us with a written representation letter
 - ❑ Tracking the status of audit findings and recommendations, if applicable

Deliverables

- Audited Financial Statements
- Single Audit Report (Federal Financial Aid)
- Management Letter – if deemed necessary

Key Dates

- April 27, 2022 Engagement Letter Signed, Audit Committee Planning Meeting
- June/July 2022 Preliminary Audit Work – Planning/SFA Testing
- August 2022 Audit Fieldwork
- Late September/Early October 2022 Draft Financial Statements
 - Discussion of Draft Financial Statements with the Audit Committee
 - Review Management letter (if necessary) and the results of the Single Audit
 - Finalize Financial Statements
- October 2022 Finalize Single Audit Report

Audit Approach

Planning

- Internal controls – documentation and systems walkthroughs
 - Cash disbursements (credit cards) / expenses
 - Cash receipts / student & grant / donation revenues
 - Payroll
 - Student Financial Aid
- Preliminary analytics and development of expectations
- Discussions with management to document any new or updated policies or procedures, and significant transactions
- Discussions with audit committee members as to any additional procedures/concerns and potential areas of additional testing

Audit Approach-Continued

Year End Field Work – Key Areas Expected to Include:

- Existence and valuation of receivables and reserves
- Student loans and related reserves
- Testing of significant capital expenditures, projects
- Cut-off related to completeness of liabilities
- Valuation of Pension and OPEB related liabilities
- Compliance and control testing related to federal funds (SFA)
- Evaluation of the completeness and accuracy of presentation of the financial statements and footnote disclosures.

Single Audit

- **Office of Management and Budget (OMB) Uniform Guidance** is the Federal law that governs the spending of Federal funds for governmental units
- OMB requires an audit if an organization spends more than \$750,000 of Federal funds per year
- The goal of the audit is to provide reasonable assurance to the Federal government that Federal funds are being spent as intended
- There were no findings from the prior year (FY 21) that require follow up on our part.

Fraud and Regulatory Matters

Our Approach:

- We will interview key personnel regarding knowledge of fraud
- Consideration of incentives, pressures, opportunities, and attitudes/tone at the top
- Follow up on matters, as necessary

Inquiries to Audit Committee:

- Is the committee aware of any fraud, suspected fraud or allegations?
- Does the committee have any concerns about specific exposures to fraud or accounts that may be susceptible to fraud?
- Has management discussed internal control to prevent, detect and deter material fraud with the committee?
- Any communications from regulators (IRS, DOL, etc)?
- Are there any other risks/areas of concern?

Relationship and Independence

- ❑ We are engaged to audit and prepare tax filings for the Foundation
- ❑ No consulting services outside of routine advice relative to accounting and tax matters
- ❑ No known roles of our staff or their relatives in any management or oversight role
- ❑ No known financial interrelationships of the firm or its staff with the University or Foundation

New GASB Pronouncements

- GASB Statement 87 – *Leases* is effective for periods beginning after **June 15, 2021**. Implementation of this standard will require lessees to recognize on their statement of net position the rights and obligations resulting from leases categorized as operating leases as assets, liabilities, or deferred inflows / outflows of resources. It provides for an election on leases with terms of less than twelve months to be excluded from this Statement.

Questions/Concerns

- Other questions, concerns, or specific issues to be reviewed as part of the audit engagement:
 - Are there any areas of concern or other areas that you would like us to investigate further?
 - Other?



April 14, 2022

Mr. Paul Boudreau
Audit Committee Chair
Westfield State University
577 Western Avenue
Westfield, MA 01086

Dear Mr. Paul Boudreau:

We are pleased to confirm our understanding of the services we are to provide Westfield State University (the "University") for the year ended June 30, 2022.

We will audit the financial statements of Westfield State University as of and for the year ended June 30, 2022, including the related notes to the financial statements, which collectively comprise the basic financial statements. Accounting standards generally accepted in the United States of America provide for certain required supplementary information (RSI), such as management's discussion and analysis, to supplement the University's basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. As part of our engagement, we will apply certain limited procedures to the University's RSI in accordance with auditing standards generally accepted in the United States of America. These limited procedures will consist of inquiries of management regarding the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We will not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance. The following RSI is required by generally accepted accounting principles and will be subjected to certain limited procedures, but will not be audited:

- Management's Discussion and Analysis
- Schedule of Proportionate Share of the Net Pension Liability
- Schedule of Contributions-Pension
- Notes to the Required Supplementary Information-Pension
- Schedule of Proportionate Share of Net OPEB Liability
- Schedule of Contributions-OPEB
- Notes to the Required Supplemental Information-OPEB

We have also been engaged to report on supplementary information other than RSI that accompanies the University's financial statements. We will subject the following supplementary information to the auditing procedures applied in our audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America, and we will provide an opinion on it in relation to the financial statements as a whole, in a separate written report.

- Schedule of Expenditures of Federal Awards

The following other information accompanying the financial statements will not be subjected to the auditing procedures applied in our audit of the financial statements, and our auditor's report will not provide an opinion or any assurance on that other information.

-Schedules of Net Position-Dormitory Trust Fund Report

-Schedules of Revenues, Expense and Changes in Net Position-Dormitory Trust Fund Report

The objectives of our audit are to obtain reasonable assurance as to whether the financial statements as a whole are free from material misstatement, whether due to fraud or error; issue an auditor's report that includes our opinion about whether your financial statements are fairly presented, in all material respects, in conformity with GAAP,; and report on the fairness of the supplementary information referred to in the second paragraph when considered in relation to the financial statements as a whole. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. Misstatements, including omissions, can arise from fraud or error and are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgement of a reasonable user made based on the financial statements. The objectives also include reporting on:

-Internal control over financial reporting and compliance with provisions of laws, regulations, contracts, and award agreements, noncompliance with which could have a material effect on the financial statements in accordance with *Government Auditing Standards*.

-Internal control over compliance related to major programs and an opinion (or disclaimer of opinion) on compliance with federal statutes, regulations, and the terms and conditions of federal awards that could have a direct and material effect on each major program in accordance with the Single Audit Act Amendments of 1996 and Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

Auditor's Responsibilities for the Audit of the Financial Statements and Single Audit

We will conduct our audit in accordance with GAAS; the standards for financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; the Single Audit Act Amendments of 1996; and the provisions of the Uniform Guidance, and will include tests of accounting records, a determination of major program(s) in accordance with Uniform Guidance, and other procedures we consider necessary to enable us to express such opinions. As part of an audit in accordance with GAAS and *Government Auditing Standards*, we exercise professional judgement and maintain professional skepticism throughout the audit.

We will evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management. We will also evaluate the overall presentation of the financial statements, including the disclosures, and determine whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation. We will plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether from (1) errors, (2) fraudulent financial reporting, (3) misappropriation of assets, or (4) violations of laws or governmental regulations that are attributable to the government or to acts by management or employees acting on behalf of the government. Because the determination of waste and abuse is subjective, *Government Auditing Standards* do not expect auditors to perform specific procedures to detect waste or abuse in financial audits nor do they expect auditors to provide reasonable assurance of detecting waste or abuse.

Because of the inherent limitations of an audit, combined with the inherent limitations of internal control, and because we will not perform a detailed examination of all transactions, there is an unavoidable risk that some material misstatements or noncompliance may not be detected by us, even though the audit is properly planned and performed in accordance with GAAS and *Government Auditing Standards*. In addition, an audit is not designed to detect immaterial misstatements or violations of laws or governmental regulations that do not have a direct and material effect on the financial statements or on major programs. However, we will inform the appropriate level of management of any material errors, any fraudulent financial reporting, or misappropriation of assets that come to our attention. We will also inform the appropriate level of management of any violations of laws or governmental regulations that come to our attention, unless clearly inconsequential. We will include such matters in the reports required for a Single Audit. Our responsibility as auditors is limited to the period covered by our audit and does not extend to any later periods for which we are not engaged as auditors.

We will also conclude, based on the audit evidence obtained, whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the government/s ability to continue as a going concern for a reasonable period of time.

Our procedures will include tests of documentary evidence supporting the transactions recorded in the accounts, tests of physical existence of inventories, and direct confirmation of receivables and certain assets and liabilities by correspondence with selected individuals, funding sources, creditors, and financial institutions. We will also request written representations from your attorneys as part of the engagement.

We may, from time to time and depending on the circumstances, use third-party service providers in serving your account. We may share confidential information about you with these service providers but remain committed to maintaining the confidentiality and security of your information. Accordingly, we maintain internal policies, procedures, and safeguards to protect the confidentiality of your personal information. In addition, we will secure confidentiality agreements with all service providers to maintain the confidentiality of your information and we will take reasonable precautions to determine that they have appropriate procedures in place to prevent the unauthorized release of your confidential information to others. In the event that we are unable to secure an appropriate confidentiality agreement, you will be asked to provide your consent prior to sharing of your confidential information with the third-party service provider. Furthermore, we will remain responsible for the work provided by any such third-party service providers.

Our audit of the financial statements does not relieve you of your responsibilities.

Audit Procedures-Internal Control

We will obtain an understanding of the government and its environment, including internal control relevant to the audit, sufficient to identify and assess the risks of material misstatement of the financial statement, whether due to error or fraud, and to design and audit procedures responsive to those risks and obtain evidence that is sufficient and appropriate to provide a basis for our opinions. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from an error. Tests of controls may be performed to test the effectiveness of certain controls that we consider relevant to preventing and detecting errors and fraud that are material to the financial statements and to preventing and detecting misstatements resulting from illegal acts and other noncompliance matters that have a direct and material effect on the financial statements. Our tests, if performed, will be less in scope than would be necessary to render an opinion on internal control and, accordingly, no opinion will be expressed in our report on internal control issued pursuant to *Government Auditing Standards*.

As required by the Uniform Guidance, we will perform tests of controls over compliance to evaluate the effectiveness of the design and operation of controls that we consider relevant to preventing or detecting material noncompliance with compliance requirements applicable to each major federal award program. However, our tests will be less in scope than would be necessary to render an opinion on those controls and, accordingly, no opinion will be expressed in our report on internal control issued pursuant to the Uniform Guidance.

An audit is not designed to provide assurance on internal control or to identify significant deficiencies or material weaknesses. However, during the audit, we will communicate to management and those charged with governance internal control related matters that are required to be communicated under AICPA professional standards, *Government Auditing Standards* and the Uniform Guidance.

Audit Procedures- Compliance

As part of obtaining reasonable assurance about whether the financial statements are free of material misstatement, we will perform tests of the University's compliance with the provisions of applicable laws, regulations, contracts, agreements, and grants. However, the objective of our audit will not be to provide an opinion on overall compliance, and we will not express such an opinion in our report on compliance issued pursuant to *Government Auditing Standards*.

The Uniform Guidance requires that we also plan and perform the audit to obtain reasonable assurance about whether the auditee has complied with federal statutes, regulations, and the terms and conditions applicable to major programs. Our procedures will consist of tests of transactions and other applicable procedures described in the *OMB Compliance Supplement* for the types of compliance requirements that could have a direct and material effect on each of the University's major programs. For federal programs that are included in the Compliance Supplement, our compliance and internal control procedures will relate to the compliance requirements that the Compliance Supplement identifies as being subject to audit. The purpose of these procedures will be to express an opinion on the University's compliance with requirements applicable to each of its major programs in our report on compliance issued pursuant to Uniform Guidance.

Other Services

We will also assist in preparing the financial statements, schedule of expenditures of federal awards and related notes and the data collection form of Westfield State in conformity with U.S. generally accepted accounting principles and the Uniform Guidance based on information provided by you. These nonaudit services do not constitute an audit under *Government Auditing Standards*. We will perform the services in accordance with applicable professional standards. The other services are limited to the financial statements, schedule of expenditures of federal awards, data collection form and the notes to schedule of expenditures of federal awards of Westfield State University as previously defined. We, in our sole professional judgment, reserve the right to refuse to perform any procedure or take any action that could be construed as assuming management responsibilities.

You agree to assume all management responsibilities for the financial statements, schedule of expenditures of federal awards, and related notes, and any other non audit services we provide. You will be required to acknowledge in the management representation letter our assistance with preparation of the financial statements, the schedule of expenditures of federal awards, and related notes and that you have reviewed and approved the financial statements, the schedule of expenditures of federal awards, and related notes prior to their issuance and have accepted responsibility for them. Further, you agree to overs the non audit services by designating an individual, preferably from senior management, with suitable skill, knowledge, or experience; evaluate the adequacy and results of those services; and accept responsibility for them.

Responsibilities of Management for the Financial Statements and Single Audit

Our audit will be conducted on the basis that you acknowledge and understand your responsibility for (1) designing, implementing, establishing, and maintaining effective internal controls, relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error, including internal controls over federal awards, and for evaluating and monitoring ongoing activities, to help ensure that appropriate goals and objectives are met; (2) following laws and regulations; (3) ensuring that there is reasonable assurance that government programs are administered in compliance with compliance requirements; (4) ensuring that management and financial information is reliable and properly reported. Management is also responsible for implementing systems designed to achieve compliance with applicable laws, regulations, contracts, and grant agreements. You are also responsible for the selection and application of accounting principles; for the preparation and fair presentation of the financial statements, schedule of expenditures of federal awards, and all accompanying information in conformity with U.S. generally accepted accounting principles; and for compliance with applicable laws and regulations (including federal statutes) and the provisions of contracts and grant agreements (including award agreements). Your responsibilities also include identifying significant contractor relationships in which the contractor has responsibility for program compliance and for the accuracy and completeness of that information.

You are also responsible for making drafts of financial statements, schedule of expenditures of federal awards, all financial records, and related information available to us and for the accuracy and completeness of that information. You are also responsible for providing us with (1) access to all information of which you are aware that is relevant to the preparation and fair presentation of the financial statements, such as records, documentation, identification of all related parties and all related-party relationships and transactions, and other matters; (2) access to personnel, accounts, books, records, supporting documentation, and other information as needed to perform an audit under the Uniform Guidance; (3) additional information that we may request for the purpose of the audit, and (4) unrestricted access to persons within the government from whom we determine it necessary to obtain audit evidence. At the conclusion of our audit, we will require certain written representations from you about the financial statements; schedule of expenditures of federal awards; federal award programs; compliance with laws, regulations, contracts, and grant agreements; and related matters.

Your responsibilities include adjusting the financial statements to correct material misstatements and for confirming to us in the written representation letter that the effects of any uncorrected misstatements aggregated by us during the current engagement and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

You are responsible for the design and implementation of programs and controls to prevent and detect fraud, and for informing us about all known or suspected fraud affecting the government involving (1) management, (2) employees who have significant roles in internal control, and (3) others where the fraud could have a material effect on the financial statements. Your

responsibilities include informing us of your knowledge of any allegations of fraud or suspected fraud affecting the University received in communications from employees, former employees, grantors, regulators, or others. In addition, you are responsible for identifying and ensuring that the University complies with applicable laws, regulations, contracts, agreements, and grants. You are also responsible for taking timely and appropriate steps to remedy fraud and noncompliance with provisions of laws, regulations, and contracts or grant agreements, or abuse that we report. Additionally, as required by the Uniform Guidance, it is management's responsibility to evaluate and monitor noncompliance with federal statutes, regulations, and the terms and conditions of federal awards; take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings; promptly follow up and take corrective action on reported audit findings; and prepare a summary schedule of prior audit findings and a separate corrective action plan. The summary schedule of prior audit findings should be available for our review at the start of our audit.

You are responsible for identifying all federal awards received and understanding and complying with the compliance requirements and for the preparation of the schedule of expenditures of federal awards (including notes and noncash assistance received, and COVID-19 related concepts, such as lost revenues, if applicable) in conformity with the Uniform Guidance. You agree to include our report on the schedule of expenditures of federal awards in any document that contains and indicates that we have reported on the schedule of expenditures of federal awards. You also agree to make the audited financial statements readily available to intended users of the schedule of expenditures of federal awards no later than the date the schedule of expenditures of federal awards is issued with our report thereon. Your responsibilities include acknowledging to us in the written representation letter that (1) you are responsible for presentation of the schedule of expenditures of federal awards in accordance with the Uniform Guidance; (2) you believe the schedule of expenditures of federal awards, including its form and content, is stated fairly in accordance with the Uniform Guidance; (3) the methods of measurement or presentation have not changed from those used in the prior period (or, if they have changed, the reasons for such changes); and (4) you have disclosed to us any significant assumptions or interpretations underlying the measurement or presentation of the schedule of expenditures of federal awards.

You are responsible for the preparation of the supplementary information, which we have been engaged to report on, in conformity with U.S. generally accepted accounting principles. You agree to include our report on the supplementary information in any document that contains and indicates that we have reported on the supplementary information. You also agree to include the audited financial statements with any presentation of the supplementary information that includes our report thereon. Your responsibilities include acknowledging to us in the written representation letter that (1) you are responsible for the presentation of the supplementary information in accordance with U.S. GAAP; (2) you believe the supplementary information, including its form and content, is fairly presented in accordance with U.S. GAAP; (3) the methods of measurement or presentation have not changed from those used in the prior period; and (4) you have disclosed to us any significant assumptions or interpretations underlying the measurement or presentation of the supplementary information.

Management is responsible for establishing and maintaining a process for tracking the status of audit findings and recommendations. Management is also responsible for identifying and

providing report copies of previous financial audits, attestation engagements, performance audits, or other studies related to the objectives discussed in the Audit scope and Objectives section of the letter. This responsibility includes relaying to us corrective actions taken to address significant findings and recommendations resulting from those audits, attestation engagements, performance audits, or studies. You are also responsible for providing managements views on our current findings, conclusions, and recommendations, as well as your planned corrective actions for the report, and for the timing and format for providing that information.

Engagement Administration, Fees, and Other

We understand that your employees will prepare all cash, accounts receivable, or other confirmations we request and will locate any documents selected by us for testing.

At the conclusion of the engagement, we will complete the appropriate sections of the Data Collection Form that summarizes our audit findings. It is management's responsibility to electronically submit the reporting package (including financial statements, schedule of expenditures of federal awards, summary schedule of prior audit findings, auditor's reports, and corrective action plan along with the Data Collection Form to the federal audit clearinghouse. We will coordinate with you the electronic submission and certification. The Data Collection Form and the reporting package must be submitted within the earlier of 30 calendar days after receipt of the auditor's reports or nine months after the end of the audit period.

We will provide copies of our reports to the University; however, management is responsible for distribution of the reports and the financial statements. Unless restricted by law or regulation, or containing privileged and confidential information, copies of our reports are to be made available for public inspection.

The audit documentation for this engagement is the property of O'Connor & Drew P.C. and constitutes confidential information. However, subject to applicable laws and regulations, audit documentation and appropriate individuals will be made available upon request and in a timely manner to the U.S. Government Accountability Office for purposes of a quality review of the audit, to resolve audit findings, or to carry out oversight responsibilities. We will notify you of any such request. If requested, access to such audit documentation will be provided under the supervision of O'Connor & Drew, P.C. personnel. Furthermore, upon request, we may provide copies of selected audit documentation to the aforementioned parties. These parties may intend, or decide, to distribute the copies or information contained therein to others, including other governmental agencies.

The audit documentation for this engagement will be retained for a minimum of five years after the report release or for any additional period requested by the governmental agency. If we are aware that a federal awarding agency, pass-through entity, or auditee is contesting an audit finding, we will contact the party(ies) contesting the audit finding for guidance prior to destroying the audit documentation.

We expect to begin our audit in approximately May 2022 and to issue our reports no later than October 15, 2022. David DiIulis is the engagement partner and is responsible for supervising the engagement and signing the reports or authorizing another individual to sign them.

Our fees for these services are \$81,000. An additional fee of \$4,500 will be included for each additional major program. These fees are based on anticipated cooperation from your personnel and the assumption that unexpected circumstances will not be encountered during the audit. If significant additional time is necessary, we will discuss it with you and arrive at a new fee estimate before we incur the additional costs. Our invoices for these fees will be rendered each month as work progresses and are payable on presentation. In accordance with our firm policies, work may be suspended if your account becomes sixty days or more overdue and may not be resumed until your account is paid in full. If we elect to terminate our services for nonpayment, our engagement will be deemed to have been completed upon written notification of termination, even if we have not completed our report. You will be obligated to compensate us for all time expended and to reimburse us for all out-of-pocket costs through the date of termination. The above fee is based on anticipated cooperation from your personnel and the assumption that unexpected circumstances will not be encountered during the audit. If significant additional time is necessary, we will discuss it with you and arrive at a new fee estimate before we incur the additional costs.

In addition, fees for any special audit-related projects, such as research and/or consultation on special business or financial issues, will be billed separately from the audit fees for professional services and may be subject to written arrangements supplemental to those in this letter.

Reporting

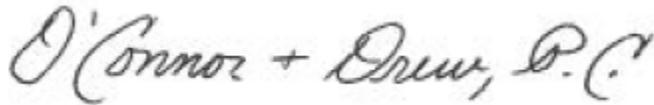
We will issue written reports upon completion of our Single Audit. Our reports will be addressed to the Board of Trustees of Westfield State University. Circumstances may arise in which our report may differ from its expected form and content based on the results of our audit. Depending on the nature of these circumstances, it may be necessary for us to modify our opinions, add a separate section, or add an emphasis of matter or other matter paragraph to our auditor's report, or if necessary, withdraw from this engagement. If our opinions are other than unmodified, we will discuss the reasons with you in advance. If, for any reason, we are unable to complete the audit or are unable to form or have not formed opinions, we may decline to express opinions or issue reports, or we may withdraw from the engagement.

The Government Auditing Standards report on internal control over financial reporting and on compliance and other matters will state that (1) the purpose of the report is solely to describe the scope of testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance, and, (2) the report is an integral part of an audit performed in accordance with Government auditing Standards in considering the entity's internal control and compliance. The Uniform Guidance report on internal control over compliance will state that the purpose of the report on internal control over compliance is solely to describe the scope of testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Both reports will state that the report is not suitable for any other purpose.

Government Auditing Standards require that we provide you with a copy of our most recent external peer review report and any letter of comment, and any subsequent peer review reports and letters of comments received during the period of the contract. Our most recent peer review report accompanies this letter.

We appreciate the opportunity to be of service to Westfield State University and believe this letter accurately summarizes the significant terms of our engagement. If you have any questions, please let us know. If you agree with the terms of our engagement as described in this letter, please sign the enclosed copy and return it to us.

Very truly yours,

A handwritten signature in cursive script that reads "O'Connor + Drew, P.C.".

O'Connor & Drew, P.C.

RESPONSE:

This letter correctly sets forth the understanding of Westfield State University.

Signature: _____

Title: _____

Date: _____

Report on the Firm's System of Quality Control

January 26, 2021

To the Owners
O'Connor & Drew, P.C.
and the Peer Review Committee of the Massachusetts Society of CPA's

We have reviewed the system of quality control for the accounting and auditing practice of O'Connor & Drew, P.C. (the firm) in effect for the year ended June 30, 2020. Our peer review was conducted in accordance with the Standards for Performing and Reporting on Peer Reviews established by the Peer Review Board of the American Institute of Certified Public Accountants (Standards).

A summary of the nature, objectives, scope, limitations of, and the procedures performed in a System Review as described in the Standards may be found at www.aicpa.org/prsummary. The summary also includes an explanation of how engagements identified as not performed or reported in conformity with applicable professional standards, if any, are evaluated by a peer reviewer to determine a peer review rating.

Firm's Responsibility

The firm is responsible for designing a system of quality control and complying with it to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. The firm is also responsible for evaluating actions to promptly remediate engagements deemed as not performed or reported in conformity with professional standards, when appropriate, and for remediating weaknesses in its system of quality control, if any.

Peer Reviewer's Responsibility

Our responsibility is to express an opinion on the design of the system of quality control and the firm's compliance therewith based on our review.

Required Selections and Considerations

Engagements selected for review included engagements performed under *Government Auditing Standards*, including compliance audits under the Single Audit Act; audits of employee benefit plans, and an examination of service organizations (SOC 2).

As part of our peer review, we considered reviews by regulatory entities as communicated by the firm, if applicable, in determining the nature and extent of our procedures.

Opinion

In our opinion, the system of quality control for the accounting and auditing practice of O'Connor & Drew, P.C. in effect for the year ended June 30, 2020, has been suitably designed and complied with to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Firms can receive a rating of *pass*, *pass with deficiency(ies)* or *fail*. O'Connor & Drew, P.C. has received a peer review rating of *pass*.

Sincerely,

A handwritten signature in cursive script that reads "Meloney + Novotny LLC". The signature is written in black ink and is positioned below the "Sincerely," text.



April 14, 2022

Mr. Paul Boudreau
Audit Committee Chair
Westfield State University
577 Western Avenue
Westfield, MA 01086

Dear Mr. Paul Boudreau:

We are pleased to confirm our understanding of the services we are to provide for Westfield State University.

We will examine Westfield State University's compliance with the "Massachusetts Office of Student Financial Assistance - Student Financial Assistance Attestation Guide" as of June 30, 2022. The objectives of our examination are to;

- (1) obtain reasonable assurance about whether Westfield State University complied with the following compliance requirements as specified in the "Massachusetts Office of Student Financial Assistance - Student Financial Assistance Attestation Guide" for the year ended June 30, 2022:
 - Institutional eligibility
 - Student eligibility
 - Reporting
 - Disbursements
 - Refunds

- (2) express an opinion as to whether Westfield State University complied, in all material respects, with the requirements set forth in the "Massachusetts Office of Student Financial Assistance – Student Financial Assistance Attestation Guide" and the Schedule of Population Items Testing and Findings for the Massachusetts State Financial Assistance programs as previously stated.

Our examination will be conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants), *Government Accounting Standards*, and the

“Massachusetts Office of Student Financial Assistance - Student Financial Assistance Attestation Guide”. Accordingly, it will include examining, on a test basis, your records and other procedures to obtain evidence necessary to enable us to express our opinion.

We will issue a written report upon completion of our examination. Our report will be addressed to Board of Trustees of Westfield State University.

We cannot provide assurance that an unmodified opinion will be expressed. Circumstances may arise in which it is necessary for us to modify our opinion. If our opinion is other than unmodified, we will discuss the reasons with you in advance. If for any reason, we are unable to complete the examination or are unable to form or have not formed an opinion, we may decline to express an opinion or may withdraw from this engagement.

Because of the inherent limitations of an examination engagement, together with the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the examination is properly planned and performed in accordance with attestation standards.

This report is intended solely for the information and use of the Board of Higher Education of the Commonwealth of Massachusetts, the Office of the State Auditor and the Office of the State Comptroller of the Commonwealth of Massachusetts, and the audit committee and management of Westfield State University and should not be used by anyone other than these specified parties. Our report will contain a paragraph indicating that had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We will plan and perform the examination to obtain reasonable assurance about whether Westfield State University complied with the requirements listed in the “Massachusetts Office of Student Financial Assistance – Student Financial Assistance Attestation Guide”. Our engagement will not include a detailed inspection of every transaction and cannot be relied on to disclose all material errors or known and suspected fraud or noncompliance with laws or regulations, or internal control deficiencies that may exist. However, we will inform you of any known or suspected fraud and noncompliance with laws or regulations, internal control deficiencies identified during the engagement, and uncorrected misstatements that come to our attention unless clearly trivial.

We understand that you will provide us with the information required for our examination and that you are responsible for the accuracy and completeness of that information. We may advise you about appropriate criteria, but the responsibility for the subject matter remains with you. You are responsible for the presentation of the Massachusetts financial aid programs in accordance with the criteria established by the Massachusetts Office of Student Financial Assistance; and for selecting the criteria and determining such criteria are appropriate for your purposes.

You are responsible for, and agree to provide us with, a written assertion about whether Westfield State University complied with the requirements listed in the “Massachusetts Office of Student Financial Assistance – Student Financial Assistance Attestation Guide”. Failure to provide such an assertion will result in our withdrawal from the engagement.

You are also responsible for providing us with (1) access to all information of which you are aware that is relevant to the measurement, evaluation, or disclosure of the subject matter; (2) additional information that we may request for the purpose of the examination; and (3) unrestricted access to persons within the entity from whom we determine it necessary to obtain evidence.

At the conclusion of the engagement, you agree to provide us with certain written representations in the form of a representation letter.

We may from time to time, and depending on the circumstances, use third-party service providers in servicing your account. We may share confidential information about you with these service providers, but we remain committed to maintaining the confidentiality and security of your information. Accordingly, we maintain internal control policies, procedures, and safeguards to protect the confidentiality of your personal information. In addition, we will secure confidentiality agreements with all service providers to maintain the confidentiality of your information, and we will take responsible precautions to determine that they have appropriate procedures in place to prevent the unauthorized release of your confidential information to others. In the event that we are unable to secure an appropriate confidentiality agreement, you will be asked to provide your consent prior to the sharing of your confidential information with the third-party service provider. Furthermore, we will remain responsible for the work provided by any such third-part service providers.

David DiIulis is the engagement partner and is responsible for supervising the engagement and signing the report or authorizing another individual to sign it.

We plan to begin our examination in June 2022 and, unless unforeseeable problems are encountered, the engagement should be completed by December 2022. Our fees for these services are \$5,000. This fee is based on anticipated cooperation from your personnel and the assumption that unexpected circumstances will not be encountered during the examination. If significant additional time is necessary, we will discuss it with you and arrive at a new fee estimate before we incur the additional costs. Our invoices for these fees will be rendered each month as work progresses and are payable on presentation. In accordance with our firm policies, work may be suspended if your account becomes sixty days or more overdue and will not be resumed until your account is paid in full. If we elect to terminate our service for nonpayment, our engagement will be deemed to have been completed upon written notification of termination, even if we have not completed our report. You will be obligated to compensate us for all time expended and to reimburse us for all out-of-pocket expenditures through the date of termination.

The working papers prepared and used during this engagement are the property of O'Connor & Drew, P.C., and constitute confidential information. However, if requested, the working papers will be provided to the Massachusetts Office of Student Financial Aid and their representatives.

Government Auditing Standards require that we provide you with a copy of our most recent external peer review report and any letter of comment, and any subsequent peer review reports and

letters of comment received during the period of contact. Our most recent peer review report accompanies this letter.

We appreciate the opportunity to assist you and believe this letter accurately summarizes the significant terms of our engagement. If you have any questions, please let us know. If you agree with the terms of our engagement as described in this letter, please sign the enclosed copy and return it to us.

Very truly yours,



O'Connor & Drew, P.C.

RESPONSE:

This letter correctly sets forth the understanding of Westfield State University.

Signature

Title

Date