IG-00-012

QUALITY CONTROL REVIEW REPORT

KPMG LLP AUDIT OF HAMPTON UNIVERSITY FOR FISCAL YEAR ENDED JUNE 30, 1998

March 6, 2000



National Aeronautics and Space Administration **OFFICE OF INSPECTOR GENERAL**

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Acronyms

| GAAP | Generally Accepted Accounting Principles |
|------|---|
| NASA | National Aeronautics and Space Administration |
| OIG | Office of Inspector General |
| OMB | Office of Management and Budget |

Office of Inspector General

March 6, 2000

Ms. Elizabeth P. Foster, Partner KPMG LLP Dominion Tower 999 Waterside Drive, Suite 2100 Norfolk, VA 23510

 Re: Final Report on Quality Control Review of KPMG LLP Audit of the Hampton University for Fiscal Year Ended June 30, 1998
Assignment No. A0001700
Report No. IG-00-012

Dear Ms. Foster:

The subject final report is provided for your use. Please refer to the Results of Review section for the overall review results.

If you have any questions concerning the report, please contact Mr. Patrick A. Iler, Director, Audit Quality, at (216) 433-5408, or Ms. Vera Garrant, A-133 Audit Manager, at (202) 358-2596. We appreciate the courtesies extended to the audit staff. The report distribution is in Appendix D.

Sincerely,

[original signed by] Russell A. Rau Assistant Inspector General for Auditing

Enclosure

cc: AO/Chief Information Officer B/Chief Financial Officer B/Comptroller BF/Director, Financial Management Division G/General Counsel H/Associate Administrator for Procurement JM/Director, Management Assessment Division

NASA Office of Inspector General

March 6, 2000

IG-00-012 A0001700

Quality Control Review of KPMG LLP Audit of Hampton University for Fiscal Year Ended June 30, 1998

Introduction

Hampton University (University) of Hampton, Virginia, is a private, coeducational university. The University's primary purpose is to provide education, knowledge, and service.

The Department of Health and Human Services (HHS) is the cognizant audit agency for the University. HHS granted the National Aeronautics and Space Administration (NASA), a Federal funding agency to the University, permission to perform a quality control review of the KPMG LLP audit of the University's fiscal year ended June 30, 1998.¹ Office of Management and Budget (OMB) Circular A-133² requires the audit. The University reported total direct fiscal year Federal expenditures for NASA of \$6,073,257 and total direct expenditures of \$48,969,129.

Appendix A provides details on the single audit requirements.

Objectives

The objective of our report review was to determine whether the report Hampton University submitted to the Federal Audit Clearinghouse³ meets the applicable reporting standards and OMB Circular A-133 reporting requirements.

The objectives of our quality control review were to determine whether KPMG LLP conducted the audit in accordance with applicable standards and whether the audit met the auditing and reporting requirements of OMB Circular A-133.

Appendixes B and C provide details on the objectives, scope and methodology.

Results of Review

We reviewed the KPMG LLP audit results, audit report format, and related working papers.

¹The Norfolk, Virginia, office of KPMG LLP, performed the single audit for the University for the fiscal year ended June 30, 1998.

²Refer to Appendix A, which contains information regarding OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations," audit requirements.

³The Single Audit Act Amendments of 1996, §7504(c), requires the Office of Management and Budget to establish the Federal Audit Clearinghouse to receive the Circular A-133 audit reports.

- **Reported A-133 Results.** Except for the report on internal control and compliance for each major program, KPMG LLP issued the audit report for Hampton University fiscal year ended June 30, 1998, on September 30, 1998. KPMG LLP issued the report on internal control and compliance for each major program on June 21, 1999. The auditors identified findings and questioned costs related to the student financial assistance programs. KPMG LLP issued an unqualified opinion⁴ on the financial statements, Schedule of Expenditures of Federal Awards,⁵ and major program compliance.⁶ The auditors also found no instances of noncompliance in the financial statement audit that must be reported under generally accepted government auditing standards.⁷ Finally, the auditors identified no material weaknesses⁸ related to internal controls for the financial statement or major programs.
- **Report Quality Review Results.** The audit report meets the applicable auditing and reporting guidance and regulatory requirements in (1) OMB Circular A-133 and its related Compliance Supplement, (2) generally accepted government auditing standards, and (3) generally accepted auditing standards.
- Audit Quality Review Results. The KPMG LLP audit work meets the applicable auditing guidance and requirements in (1) OMB Circular A-133 and its related Compliance Supplement, (2) generally accepted government auditing standards, and (3) generally accepted auditing standards.

Other Matters of Interest

During the quality control review, we obtained a copy of the September 30, 1998, KPMG LLP management letter to the Board of Trustees, Hampton University. KPMG LLP commented on year 2000 compliance and tax and periodic financial statement reporting. KPMG LLP recommends that the University (1) regularly update the University's Board of Trustees about the University's efforts to correct the anticipated computer-related business applications failures that will result from using the 2000 date in its data, (2) develop a process to ensure proper filing of an Internal Revenue Service information return for reporting payments received on behalf of its students, and (3) prepare financial

⁶Major program compliance refers to an assessment of the auditee's compliance with laws, regulations, and provisions of contracts or grant agreements that could have a direct and material effect on each major program. ⁷These standards, promulgated by the Comptroller General of the United States, are broad statements of the auditors'

⁴An unqualified opinion means that the financial statements are presented fairly in all material respects, expenditures of Federal funds are presented fairly, in relation to the financial statements taken as a whole, and the auditee has complied with all applicable laws, regulations, and contract provisions that could have a direct and material effect on each major program.

⁵The Schedule of Expenditures of Federal Awards is a schedule showing the amount of annual Federal award expenditures by Federal agency for each program, grant, or contract.

responsibilities.

⁸The American Institute of Certified Public Accountants (AICPA) Statement of Position (SOP) 98-3, Appendix D, defines material weakness as "... the condition in which the design or operation of one or more of the internal control components [control environment, risk assessment, control activities, information and communication, and monitoring] does not reduce to a relatively low level the risk that misstatements in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions."

statements periodically throughout the year. NASA Management should be aware of these issues to determine the impact to NASA awards to Hampton University.

KPMG LLP Schedule of Findings and Questioned Costs

Below are the findings and questioned costs identified by KPMG LLP on pages 12 and 13 of the OMB Circular A-133 audit report. The Department of Education is responsible for resolving the findings and questioned costs.

| Finding | Report | | Costs |
|-----------|----------|--------------------------------------|------------|
| Reference | Page No. | Finding Description | Questioned |
| 98-1 | 12 | Stipends | \$ 4,444 |
| 98-2 | 13 | Selective Service Status | 2,700 |
| 98-3 | 13 | Verification Procedures ¹ | N/A^2 |
| 98-4 | 13 | Satisfactory Academic Progress | 10,200 |
| 98-5 | 13 | Third Party Servicer | N/A |

¹This is a repeat of finding 97-2 from the fiscal year 1997 audit report. ²Not applicable.

Appendix C contains details regarding the auditor's responsibilities and the NASA OIG review of the Schedule of Findings and Questioned Costs.

The Inspector General Act of 1978, as amended (Public Law 95-452), requires an agency's Inspector General to "take appropriate steps to assure that any work performed by non-Federal auditors complies with the standards established by the Comptroller General."

The Single Audit Act of 1984 (Public Law 98-502) was intended to improve the financial management of state and local governments, while OMB Circular A-133 was intended to improve financial management for nonprofit organizations. The Act and the Circular established uniform requirements for audits of Federal financial assistance, promoted efficient and effective use of audit resources, and helped to ensure that Federal departments and agencies rely on and use the audit work to the maximum extent practicable.

The Single Audit Act Amendments of 1996 (Public Law 104-156) incorporate the previously excluded nonprofit organizations. Including the nonprofit organizations strengthens the usefulness of the audits by establishing one uniform set of auditing and reporting requirements for all Federal award recipients that are required to obtain a single audit. Major changes to the Act include: (1) increasing the audit threshold from \$25,000 to \$300,000 with respect to Federal financial assistance programs before an audit is required; (2) selecting Federal programs for audit based on a risk assessment rather than the amount of funds involved; and (3) improving the contents and timeliness of single audits.

OMB issued the revised Circular A-133 on June 24, 1997, pursuant to the Single Audit Act Amendments of 1996. In general, the Circular requires that an auditee who expends \$300,000 or more annually in Federal awards obtain an audit and issue a report of its Federal award expenditures in accordance with the generally accepted government auditing standards applicable to financial audits. The audit must be performed by auditors who meet the independent standards in generally accepted government auditing standards and in accordance with the auditing and reporting requirements of the Circular and its related Compliance Supplement. The audit report submission contains the:

- financial statements and related opinion,
- Schedule of Expenditures of Federal Awards and related opinion,
- report on the internal controls and compliance review of the financial statements,
- report on internal controls reviewed and compliance opinion on major programs, and
- Schedule of Findings and Questioned Costs.

The auditee must also submit a Data Collection Form to the Department of Commerce Clearinghouse. The form summarizes the significant information in the audit report for dissemination to the public through the Internet. Responsible officials from the audited entity and the audit organization sign the form certifying to the information presented. The Compliance Supplement is based on the requirements of the Single Audit Act Amendments of 1996 and the final June 24, 1997, revision of OMB Circular A-133, which provide for the issuance of a compliance supplement to assist auditors in performing the required audits. The National State Auditors Association study states:

The Compliance Supplement provides an invaluable tool to both Federal agencies and auditors in setting forth the important provisions of Federal assistance programs. This tool allows Federal agencies to effectively communicate items which they believe are important to the successful management of the program and legislative intent....

Compliance with the Supplement satisfies the requirements of OMB Circular A-133. The Supplement identifies Federal programs by Federal agency. The Supplement identifies existing, important, compliance requirements, which the Federal Government expects the auditors to consider as part of an audit required by the 1996 Amendments. Using the Supplement eliminates the need for the auditors to research the laws and regulations for each major program audit to determine the compliance requirements that are important to the Federal Government and that could have a direct and material effect on the major program. The Supplement is a more efficient and cost-effective approach to performing this research. It "… provides a source of information for auditors to understand the Federal program's objectives, procedures, and compliance requirements relevant to the audit as well as audit objectives and suggested audit procedures for determining compliance with the requirements."

For single audits, the Supplement replaces agency audit guides and other audit requirement documents for individual Federal programs and specifically states which of the following 14 compliance requirements are applicable to a major program that may be audited:

- 1. Activities Allowed or Unallowed
- 2. Allowable Costs/Cost Principles
- 3. Cash Management
- 4. Davis-Bacon Act
- 5. Eligibility
- 6. Equipment and Real Property Management
- 7. Matching, Level of Effort, Earmarking
- 8. Period of Availability of Federal Funds
- 9. Procurement and Suspension and Debarment
- 10. Program Income
- 11. Real Property Acquisition/Relocation Assistance
- 12. Reporting
- 13. Subrecipient Monitoring
- 14. Special Tests and Provisions

The Compliance Supplement assists the auditors in determining the audit scope for the Circular's internal control requirements. For each compliance requirement, the Supplement describes the objectives of internal control and certain characteristics that when present and operating effectively, may ensure compliance with program requirements. The Supplement gives examples of the common characteristics for the 5 components of internal controls (control environment, risk assessment, control activities, information and communication, and monitoring) for the 14 compliance requirements.

Audit Report Review

The objective of an audit report review is to determine whether the report submitted by the auditee meets the applicable reporting standards and the OMB Circular A-133 reporting requirements. As a Federal funding agency to Hampton University, we performed a review of the audit report on the University for its fiscal year ended June 30, 1998. We reviewed the report for compliance with the requirements of the Single Audit Act, Single Audit Act Amendments of 1996, and OMB Circular A-133. We focused our review on the report's qualitative aspects of (1) due professional care; (2) auditor's qualifications and independence; (3) financial statements, compliance, and internal control reporting; (4) Schedule of Expenditures of Federal Awards; and (5) Schedule of Findings and Questioned Costs.⁹

Quality Control Review

The objectives of a quality control review are to ensure that an audit was conducted in accordance with generally accepted government auditing standards¹⁰ and generally accepted auditing standards and whether the audit meets the auditing and reporting requirements of OMB Circular A-133. As a Federal funding agency to Hampton University, we conducted a quality control review of the KPMG LLP audit working papers. We focused the review on the audit's qualitative aspects of:

- auditor's qualifications,
- independence,
- due professional care,
- quality control,
- planning and supervision,
- Federal receivables and payables,
- major program determination,
- internal controls and compliance testing for major programs,
- Schedule of Expenditures of Federal Awards,
- Schedule of Findings and Questioned Costs, and
- Data Collection Form.

We organized our review by the general and field work audit standards and the required elements of a single audit. We emphasized the areas of major concern to the Federal Government such as determining and auditing major program compliance and internal controls. We conducted the

⁹Appendix C describes the information contained in the Schedule of Findings and Questioned Costs.

¹⁰These standards, promulgated by the Comptroller General of the United States, are broad statements of the auditors' responsibilities.

Appendix B

review December 1 and 2, 1999, at the Norfolk, Virginia, office of KPMG LLP. The NASA Office of Inspector General previously performed a quality control review at another KPMG LLP location that did not result in any findings.

Peer Review Report

We reviewed the December 16, 1999, report on the most recent peer review of KPMG LLP, performed by PricewaterhouseCoopers LLP. PricewaterhouseCoopers LLP determined that KPMG LLP met the objectives of the quality control review standards established by the American Institute of Certified Public Accountants and that KPMG LLP complied with the standards during the fiscal year ended March 31, 1999.

Independent Auditor's Report

The auditors are required to determine whether the financial statements are presented fairly in all material respects in conformity with generally accepted auditing principles and are free of material misstatement. We reviewed the audit programs and the testing of evidence to determine whether testing was sufficient based on an assessment of control risk to warrant the conclusion reached. We also reviewed the working papers to determine whether they supported the conclusion.

Independent Auditor's Report on Schedule of Expenditures of Federal Awards

The auditors are required to subject the Schedule of Expenditures of Federal Awards to the procedures applicable to the audit of the financial statements and to ensure that the amounts are fairly stated in relation to the basic financial statements. We reviewed the audit programs and the testing of evidence to determine whether testing was sufficient based on an assessment of control risk to warrant the conclusion reached. We also reviewed the working papers to determine whether they supported the conclusion.

Schedule of Expenditures of Federal Awards

The recipient is responsible for creating the Schedule of Expenditures of Federal Awards and the accompanying notes to the Schedule. The auditors are required to audit the information in the Schedule and review the notes to ensure it is fairly presented in all material respects in relation to the financial statements taken as a whole. We reviewed the audit programs for the appropriate procedures and traced some of the amounts to the Subsidiary Ledger and/or Trial Balance.

Independent Auditor's Report on Compliance and on Internal Control Over Financial Reporting Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards

The auditors are required to determine whether the recipient has complied with laws and regulations that may have a direct and material effect in determining financial statement amounts. The auditors are also required to obtain an understanding of internal controls that is sufficient to plan the audit and to assess control risk. We reviewed the audit programs for the appropriate procedures, the working paper documentation, and the compliance and substantive testing performed.

Appendix C

Independent Auditor's Report on Compliance with Requirements Applicable to Each Major Program and Internal Control Over Compliance in Accordance with OMB Circular A-133

The auditors are required to determine whether the recipient has complied with laws, regulations, and the provisions of contracts and grant agreements that may have a direct and material effect on each of its major Federal programs. The auditors are required to use the procedures in the OMB Circular A-133 Compliance Supplement (April 1999) to determine the compliance requirements for each major program. We reviewed the audit program for the appropriate procedures and compared the audit program steps to those in the Compliance Supplement to determine whether the applicable steps had been performed. We also reviewed the working paper documentation and its support and the compliance tests performed.

The auditors must perform procedures to obtain an understanding of internal controls over Federal programs that is sufficient to plan an audit to support a low-assessed level of control risk for major programs. The auditors must plan and perform internal controls testing over major programs to support a low level of control risk for the assertions relevant to the compliance requirements for each major program. We reviewed the audit programs for the appropriate procedures, the working paper documentation, and the test of controls performed.

Schedule of Findings and Questioned Costs

The auditors are required to prepare a Schedule of Findings and Questioned Costs that summarizes the audit results. This schedule includes information about and related to the audit that is not required to be identified in other parts of the audit report including: (1) major programs audited, (2) details on findings and questioned costs (including reportable conditions and material weaknesses), (3) dollar threshold to identify major programs, and (4) whether the recipient is considered to be low risk. We reviewed the audit programs for the appropriate procedures and the working paper documentation supporting the information in the schedule.

Summary Status Schedule of Prior Audit Findings

Hampton University is required to prepare a Summary Schedule of Prior Audit Findings that reports the status of all audit findings included in the prior audit's schedule of findings and questioned costs relative to Federal awards. The Schedule must state whether corrective action is completed, in process, or significantly different from the planned corrective action previously reported. If applicable, the Schedule must also state the reasons the auditee believes the audit findings are no longer valid or do not require further corrective action.

The auditor is required to follow-up on prior audit findings and perform procedures to assess the reasonableness of the University's Summary Schedule of Prior Audit Findings. If the auditor concludes that the Schedule materially misrepresents the status of any prior audit finding, the

auditor must report the misrepresentation as a current year audit finding. The auditor must perform audit follow-up procedures regardless of whether a prior audit finding relates to a major program in the current year. We reviewed the auditors' determination that the Schedule of Prior Audit Findings materially represents the status of the prior year findings.

Audit Firm

Ms. Elizabeth P. Foster, Partner KPMG LLP Dominion Tower 999 Waterside Drive, Suite 2100 Norfolk, VA 23510

Audited Organization

Mr. Leon L. Scott Vice President for Business Affairs and Treasurer Hampton University Administration Building Hampton, VA 23668

Federal Offices of Inspector General

Department of Agriculture Department of Commerce Department of Defense Department of Education Department of Energy Department of Health and Human Services Department of Housing and Urban Development Department of Transportation Environmental Protection Agency National Foundation for the Arts National Foundation for the Humanities National Science Foundation

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Appendix D

NASA Centers

Director, Goddard Space Flight Center Director, Langley Research Center

NASA Assistant Inspector General for Auditing **Reader Survey**

The NASA Office of Inspector General has a continuing interest in improving the usefulness of our reports. We wish to make our reports responsive to our customers' interests, consistent with our statutory responsibility. Could you help us by completing our reader survey? For your convenience, the questionnaire can be completed electronically through our homepage at http://www.hq.nasa.gov/office/oig/hq/audits.html or can be mailed to the Assistant Inspector General for Auditing; NASA Headquarters, Code W, Washington, DC 20546-0001.

Report Title: KPMG LLP Audit of Hampton University for Fiscal Year Ended June 30, 1998

Report Number: Report Date:

Strongl Strongl N/A Neutra Disagre Agree у Disagre Agree 1 e е The report was clear, readable, and logically 4 3 1. 5 2 1 N/A organized. 2. The report was concise and to the point. 5 4 3 2 1 N/A 5 4 3 2 1 N/A 3. We effectively communicated the audit objectives, scope, and methodology. 4. The report contained sufficient information to 5 4 3 2 1 N/A support the finding(s) in a balanced and objective manner.

Circle the appropriate rating for the following statements.

Overall, how would you rate the report?

| Excellent | Fair | Very Good | Poor | Good |
|-----------|------|-----------|------|------|
|-----------|------|-----------|------|------|

If you have any additional comments or wish to elaborate on any of the above responses, please write them here. Use additional paper if necessary.

How did you use the report? _____

How could we improve our report? _____

How would you identify yourself? (Select one)

| Congressional Staff | | Media | | | |
|---------------------|----------|-----------------|-----------------|--|--|
| NASA Employee | | Public Interest | Public Interest | | |
| Private Citizen | | Other: | | | |
| Government: | Federal: | State: | Local: | | |

May we contact you about your comments?

| Yes | No |
|------------|----|
| Name: | |
| Telephone: | |

Thank you for your cooperation in completing this survey.

Major Contributors to the Report

Patrick A. Iler, Director, Audit Quality Vera J. Garrant, A-133 Audit Manager Tewana Hoskins, Program Assistant Nancy C. Cipolla, Report Process Manager