

STATE OF WEST VIRGINIA
AUDIT REPORT
OF

CONCORD COLLEGE
ATHENS, WEST VIRGINIA

PELL GRANT PROGRAM
SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT PROGRAM
COLLEGE WORK-STUDY PROGRAM
PERKINS LOAN PROGRAM
GUARANTEED STUDENT LOAN PROGRAM

U.S. DEPARTMENT OF EDUCATION
ENTITY NUMBER: 1-55-6000-761-A1

FOR THE PERIOD
JULY 1, 1983 - JUNE 30, 1987



OFFICE OF LEGISLATIVE AUDITOR

CAPITOL BUILDING

CHARLESTON 5, WEST VIRGINIA

CONCORD COLLEGE
ATHENS, WEST VIRGINIA

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LEGISLATIVE AUDITOR'S OFFICE
STATE OF WEST VIRGINIA

West Virginia



LEGISLATIVE AUDITOR

CHARLESTON

The Honorable Encil Bailey
Legislative Auditor
State Capitol - West Wing
Charleston, West Virginia

Sir:

In compliance with your instructions and the provisions of the West Virginia Code, Chapter 4, Article 2, as amended, we have examined the Pell Grant, Supplemental Educational Opportunity Grant, College Work-Study, Perkins Loan and the Guaranteed Student Loan Programs at Concord College.

Our examination covers the period July 1, 1983 through June 30, 1987. The results of the examination are set forth on the following pages of this report.

Respectfully submitted,

Theodore L. Shanklin

Theodore L. Shanklin, CPA, Director
Legislative Postaudit Division

TLS/dws

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Concord College
Athens, West Virginia

Report of Audit
Pell Grant Program
Supplemental Educational Opportunity Grant Program
College Work-Study Program
Perkins Loan Program
Guaranteed Student Loan Program

U.S. Department of Education
Entity Number: 1-55-6000-761-A1

For the Period July 1, 1983 - June 30, 1987

Part I - Introduction

Background

Concord College is an institution of higher education and was last approved on December 1, 1981 by the U.S. Department of Education for participation in the Student Financial Assistance Programs. Our examination of the Pell Grant Program, Supplemental Educational Opportunity Grant Program, College Work-Study Program and Perkins Loan Program for the four-year period ended June 30, 1987 and the Guaranteed Student Loan Program for the four-year period ended June 30, 1987 was directed toward the objectives set forth in the U.S. Department of Education's March 1984 Audit Guide for Student Financial Assistance Programs (Guide).

Pell Grant Program (PGP)

The PGP (formerly Basic Educational Opportunity Grant Program) was established under Title IV, Part A-1 of the Higher Education Act of 1965 (P.L. 89-329), as amended. The College began participating in the PGP on July 1, 1973. During the four-year period ended June 30, 1987, awards to students aggregated \$3,715,857.87 while up to 808 students annually participated in the program. U.S. Department of Education authorization award letters to the College aggregated \$3,715,868.00 and were in the amounts of \$1,044,857.00, \$1,083,867.00, \$847,171.00, and \$739,973.00 for the fiscal years ended June 30, 1987, 1986, 1985 and 1984, respectively.

Supplemental Educational Opportunity Grant Program (SEOGP)

The SEOGP was established under Title IV, Part A of the Higher Education Act of 1965, as amended. The College began participating in the SEOGP on June 24, 1966. During the four-year period ended June 30, 1987, up to 283 students participated in the program each year and awards to students aggregated \$521,592.12. U.S. Department of Education authorization award letters to the College aggregated \$517,362.00 and were in the amounts of \$129,610.00, \$129,610.00 and 129,610.00, and \$128,532.00 for the fiscal years ended June 30, 1987, 1986, 1985, and 1984, respectively.

College Work-Study Program (CWSP)

The CWSP was established under Title IV, Part C of the Higher Education Act of 1965, as amended. The College began participating in the CWSP on January 25, 1965. During the four-year period ended June 30, 1987, up to 446 students participated in the program each year and expenditures for wages for the period aggregated \$1,145,392.00. U.S. Department of Education authorization award letters to the College were in the amounts of \$265,846.00, \$247,226.00, \$265,846.00, and \$265,846.00 for the fiscal years ended June 30, 1987, 1986, 1985 and 1984, respectively.

Perkins Loan Program (PLP)

The PLP (formerly National Direct Student Loan Program) was established under the National Defense Education Act of 1958, which was transferred in 1972 to Part E of Title IV of the Higher Education Act of 1965. The College began participating in the PLP on September 3, 1959 and since that date it has made 5,243 loans aggregating \$4,718,119.32. The principal outstanding on loans in default amounts to 8.95% of the matured principal on all loans as of June 30, 1987.

Guaranteed Student Loan Program (GSLP)

The GSLP was established under Title IV, Part B of the Higher Education Act of 1965, as amended. During the four-year period ended June 30, 1987, guaranteed loans were received by 2,217 students with 572 students, 593 students, 587 students and 465 students receiving loans in the fiscal years of 1987, 1986, 1985 and 1984, respectively.

Administration of Programs

The College officials responsible for overall administration of the programs are the Financial Aid Administrator and the Business Manager. The Financial Aid Administrator is responsible for application processing and loan approvals, as well as the College's compliance with the various U.S. Department of Education regulations governing the College's participation in Federal and State financial assistance programs. The Business Manager is responsible for the programs' financial management, general ledger accounting, payments, collections and financial reports.

Scope of Audit

Our audit of the Pell Grant Program, Supplemental Educational Opportunity Grant Program, College Work-Study Program, Perkins Loan Program and the Guaranteed Student Loan Program was performed in accordance with the financial and compliance elements of the Standards for Audit of Governmental Organizations, Programs, Activities and Functions (1981 Revision) and the Guide. The purpose of the audit was to formulate an opinion of the basic financial statement taken as a whole and to determine if these programs were administered in accordance with the applicable laws, regulations, agreements to participate, and U.S. Department of Education's directives which are set forth in the Guide.

The audit included:

1. Expressing an opinion on the statement of changes in Student Financial Assistance Programs fund balances and supplementary schedules.
2. Evaluation of the institution's policies, procedures and practices used to administer the programs.
3. Determination of compliance with applicable sections of the Acts, related Federal regulations and U.S. Department of Education policies and procedures.
4. Evaluation of the institution's system of internal control, accounting and reporting, and the controls maintained in the operation of and accounting for the funds provided for the programs.
5. Reconciliation of the information reported on the appropriate financial statements with ED Form 646-1 and ED Form 255-4 for the years audited.

As part of our audit, we obtained confirmation from selected students who had PLP loan balances as of June 30, 1987.

Part II - Highlights of Audit Results

During our audit, nothing came to our attention which caused us to believe that Concord College had not generally administered its Student Financial Assistance Programs (PGP, SEOGP, CWSP, PLP, and GSLP) in accordance with the U.S. Department of Education's Federal regulations and directives cited in the Guide for PGP, SEOGP, CWSP, PLP and GSLP. However, certain areas of the College's management of the Student Financial Assistance Programs were in need of attention. More specifically,

1. The College does not have adequate procedures in place to identify those students who leave without properly withdrawing.
2. The College does not maintain a record for each student which reflects the amount, date, check number and other information concerning the award for the Pell Grant Program as required by 34 CFR 690.83.
3. The College is not matching Federal Capital Contributions with Institutional Capital Contributions on a timely basis.

These matters are discussed more fully under the "Findings and Recommendations" section of this report. (See Pages 14-15.)

Part III - Auditors' Report on Statement of Changes in Student Financial Assistance Programs Fund Balances

The Honorable Encil Bailey
Legislative Auditor
State Capitol - West Wing
Charleston, West Virginia

Sir:

We have examined the accompanying statement of changes in the Student Financial Assistance Programs fund balances of Concord College for the four-year period ended June 30, 1987. Our examination was made in accordance with Standards for Audit of Governmental Organizations, Programs, Activities, and Functions issued by the U.S. Comptroller General (GAO) in June 1972 and revised February 1981 and the U.S. Department of Education's March 1984 Audit Guide for Student Financial Assistance Programs and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

The accompanying statement was prepared for the purpose of complying with the audit requirement relating to the Student Financial Assistance Programs of the U.S. Department of Education and is limited to the activities related to these programs.

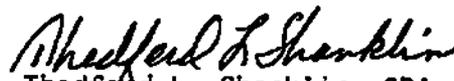
As described in Note One and in accordance with prescribed practices of the Program, the College has not accrued interest on student loans receivable nor provided an allowance for doubtful loans receivable. Interest on loans is recorded when received. Uncollectible loans are recognized when cancelled or written-off in conformity with the Perkins Loan Program requirements. These practices do not conform with generally accepted accounting principles.

In our opinion, except for the effects of not accruing earned interest on student loans receivable and of not providing an allowance for doubtful loans receivable, the statement referred to above presents fairly the changes in Student Financial Assistance Programs fund balances of Concord College for the four-year period ended June 30, 1987, in conformity with generally accepted accounting principles applied on a consistent basis.

Our examination was made for the purpose of forming an opinion on the accompanying statement of changes in Student Financial Assistance Programs fund balances taken as a whole. The information included in the supplementary schedule of disbursements and expenditures for each Student Financial Assistance Program for the four-year period ended June 30, 1987, is presented for purposes of additional analysis and is not a required part of the accompanying statement of changes in Student Financial Assistance Programs fund balances. The information has been subjected

to the auditing procedures applied in the examination of the accompanying statement of changes in Student Financial Assistance Programs fund balances of Concord College and, in our opinion, is fairly stated in all material respects in relation to the accompanying statement taken as a whole.

Respectfully submitted,



Thedford L. Shanklin, CPA, Director
Legislative Postaudit Division

July 22, 1988

Auditors: Michael E. Sizemore, CPA, Supervisor
Leonard H. Lewis, Auditor-in-Charge
Robert E. High
Ronald F. Osmianski

CONCORD COLLEGE
STATEMENT OF CHANGES IN STUDENT FINANCIAL
ASSISTANCE PROGRAMS FUND BALANCES
FOR THE FOUR-YEAR PERIOD ENDED JUNE 30, 1987

	<u>Grants and College Work-Study</u>		
	<u>Pell</u>	<u>SEOG</u>	<u>CWS</u>
Additions:			
Federal Awards	\$3,715,868.00	\$517,362.00	\$1,044,764.00
Other Administrative Cost Allowance Received	<u>15,200.00</u>	<u>-0-</u>	<u>-0-</u>
Total Additions	3,731,068.00	517,362.00	1,044,764.00
Deductions:			
Grants	3,715,857.87	521,592.12	-0-
Wages	-0-	-0-	1,145,392.00
FICA Matching	-0-	-0-	5,753.82
Other Benefits	-0-	-0-	4,918.73
Loan Cancellations	-0-	-0-	-0-
Collection Costs	-0-	-0-	-0-
Administrative Expenses	15,200.00	20,705.59	73,083.63
Defaulted Loan Principal and Interest Assigned to Dept. Ed. Job Location and Development	-0-	-0-	-0-
Amounts Returned to Government	-0-	-0-	41,390.61
	<u>-0-</u>	<u>-0-</u>	<u>4,774.25</u>
Total Deductions	3,731,057.87	542,297.71	1,275,313.04
Other Changes:			
Institutional Matching Funds	-0-	-0-	225,889.43
Non-Institutional Matching Funds	-0-	-0-	23,638.87
Interest	-0-	-0-	-0-
Reimbursement on Loans Cancelled	-0-	-0-	-0-
Transfer Among Programs	-0-	24,935.71	(24,935.71)
Federal Funds in Excess of Authorization	23,461.71	-0-	-0-
Federal Funds Not Requested	<u>-0-</u>	<u>-0-</u>	<u>(8,162.13)</u>
Total Other Changes	23,461.71	24,935.71	216,430.46
Net (Increase) Decrease in Fund Balances	23,471.84	-0-	(14,118.58)
Beginning Fund Balance, July 1, 1983	<u>10,203.48</u>	<u>-0-</u>	<u>14,210.88</u>
Ending Fund Balance, June 30, 1987	<u>\$ 33,675.32</u>	<u>\$ -0-</u>	<u>\$ 92.30</u>

See Notes to Financial Statement

<u>Student Loans</u>	
<u>Perkins</u>	<u>Total</u>
\$ 83,146.00	\$5,361,140.00
<u>-0-</u>	<u>15,200.00</u>
83,146.00	5,376,340.00
-0-	4,237,449.99
-0-	1,145,392.00
-0-	5,753.82
-0-	4,918.73
128,314.11	128,314.11
8,390.84	8,390.84
-0-	108,989.22
68,689.28	68,689.28
-0-	41,390.61
<u>-0-</u>	<u>4,774.25</u>
205,394.23	5,754,062.85
7,540.98	233,430.41
-0-	23,638.87
132,324.47	132,324.47
52,892.00	52,892.00
-0-	-0-
-0-	23,461.71
<u>-0-</u>	<u>(8,162.13)</u>
<u>192,757.45</u>	<u>457,585.33</u>
70,509.22	79,862.48
<u>2,039,757.18</u>	<u>2,064,171.54</u>
<u>\$2,110,266.40</u>	<u>\$2,144,034.02</u>

Exhibit A

Notes to Statement of Changes in Student Financial Assistance Programs Fund Balances

(1) Basis of Presentation

The accompanying statement of changes in Student Financial Assistance Programs fund balances has been prepared in accordance with accounting practices prescribed for such programs by the U.S. Department of Education's fiscal control and fund accounting procedures and the format as set forth in the publication Audit Guide for Student Financial Assistance Programs. The purpose of the statement is to present, in summary form, student financial assistance activities of Concord College for the four-year period ended June 30, 1987, which have been financed by the U.S. Department of Education. Except as described in the following paragraph, these accounting practices are in agreement with generally accepted accounting principles.

The Perkins Loan Program does not provide for accrual of interest on student loans receivable nor for a provision of allowance for doubtful loans. Interest on loans is recorded as received and uncollectible loans are recognized when the loans are cancelled or written-off. These practices are in conformity with the Perkins Loan Program requirements. The effects of these variations from generally accepted accounting principles have not been determined.

Because the statement of changes in fund balances presents only a selected portion of the activities of Concord College, it is not intended to and does not present either the financial position, changes in fund balances or the current funds, revenues, expenditures and other changes in fund balances of the College.

(2) Administrative Expenses

Participating colleges earn an Administrative Cost Allowance to use as an offset to the actual cost of administering the Student Financial Assistance Programs. The U.S. Department of Education pays the allowance earned by the Pell Grant Program directly to the College. The campus-based programs, (i.e. Supplemental Educational Opportunity Grant Program, College Work-Study Program and the Perkins Loan Program) provide for the allowance to pay the College from monies in the various programs. The Regulations also allow for the payment of the allowance from each of the programs or from any one of the programs.

The College's earned allowance from the campus-based programs was \$93,789.22 and this amount is reflected in the \$108,989.22 for Administrative Expenses in the Total Column on Exhibit A. The Administrative Expenses shown under the SEOG, CWS and Student Loans columns is the actual amount paid or to be paid from each of the programs.

(3) Other Changes

These changes represent increases or decreases to the various program funds due to transfers among programs, carry forwards and carry backs within the same programs from and to fiscal years outside our audit period, overdraws of Federal authorizations, amounts returned to the U.S. Department of Education, and Federal awards authorized but not requested.

(4) Combined Totals

The combined totals contain the totals of similar accounts of the various programs. The totaling of the accounts is for memorandum only and does not indicate that the combined balances are available for any purpose other than provided by laws, rules and regulations governing the separate programs.

Part IV - Auditors' Report on Internal Accounting Control

The Honorable Encil Bailey
Legislative Auditor
State Capitol - West Wing
Charleston, West Virginia

Sir:

We have examined the statement of changes in fund balances for the Student Financial Assistance Programs of Concord College for the four-year period ended June 30, 1987, and have issued our report thereon dated July 22, 1988.

As part of our examination, we made a study and evaluation of the system of internal accounting control of Concord College to the extent we considered necessary to evaluate the system as required by generally accepted auditing standards and the standards for financial and compliance audits contained in the U.S. General Accounting Office's Standards for Audit of Governmental Organizations, Programs, Activities and Functions (1981 Revision). For the purpose of this report, we have classified the significant internal accounting controls in the following categories:

1. Receipts
2. Disbursements
3. Granting of Loans
4. Payment of Administrative Expenses
5. Collection of Loan Principal and Interest
6. Payment of Litigation Costs
7. Cancellation of Loans
8. Federal and Institutional Capital Contribution
9. Posting of Transactions

Our study included all of the control categories listed above. The purpose of our study and evaluation was to determine the nature, timing, and extent of performing the auditing procedures necessary for expressing an opinion on the entity's financial statements. Our study and evaluation was more limited than would be necessary to express an opinion on the system of internal accounting control taken as a whole or on any of the categories of controls identified above.

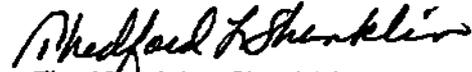
The management of Concord College is responsible for establishing and maintaining a system of internal accounting control. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of control procedures. The objectives of a system are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in accordance with generally accepted accounting principles.

Because of inherent limitations in any system of internal accounting control, errors or irregularities may nevertheless occur and not be detected. Also, projection of any evaluation of the system to future periods is subject to the risk that procedures may become inadequate because of changes in conditions or that the degree of compliance with the procedures may deteriorate.

Our study and evaluation made for the limited purpose described in the first paragraph would not necessarily disclose all material weaknesses in the system. Accordingly, we do not express an opinion on the system of internal accounting control of Concord College taken as a whole or on any of the categories of controls identified in the first paragraph. However, except as described in the "Findings and Recommendations" section of this report our study and evaluation disclosed no condition that we believe to be a material weakness.

This report is intended solely for the use of management and the U.S. Department of Education and should not be used for any other purpose.

Respectfully submitted,



Theodor L. Shanklin, CPA, Director
Legislative Postaudit Division

July 22, 1988

Auditors: Michael E. Sizemore, CPA, Supervisor
Leonard H. Lewis, Auditor-in-Charge
Robert E. High
Ronald F. Osmianski

Part V - Auditors' Report on Compliance

The Honorable Encil Bailey
Legislative Auditor
State Capitol - West Wing
Charleston, West Virginia

Sir:

We have examined the accompanying statement of changes in Student Financial Assistance Programs fund balances of Concord College for the four-year period ended June 30, 1987 and have issued our report thereon dated July 22, 1988. As part of our examination, we made a study and evaluation of those internal administrative methods and procedures established by Concord College to administer and account for Student Financial Assistance Programs in accordance with the significant administrative requirements of the U.S. Department of Education's March 1984 Audit Guide for Student Financial Assistance Programs (Guide), Section II and the following compliance requirements:

- I. Cash Management
- II. Financial Reporting
- III. Institutional Eligibility and Participation
- IV. Coordination of Student Aid Programs
- V. Student File Maintenance Fiscal Procedures and Record Keeping
- VI. Student Eligibility
- VII. Institutional Disbursements to Award Recipients
- VIII. Refund Calculation and Overpayment Determination Procedures

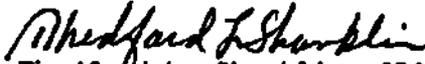
We understand that procedures and systems in conformity with the criteria contained in these significant administrative requirements are considered by the U.S. Department of Education to be adequate for its purposes in accordance with the provisions of the Higher Education Act, as amended. Based on this understanding of our study and evaluation, we believe the institution's procedures and systems were adequate for the U.S. Department of Education's purposes.

In addition, our examination also included tests of controls to ensure compliance with the provisions of certain major program terms and conditions identified in Section II - Compliance Requirements of the Guide. Based upon our examination, we found that for the items tested the institution complied with the material terms and conditions of the student financial assistance award agreements except as described in the "Findings and Recommendations" section of this report.

Further, based on our examination and the procedures referred to above, except as discussed in the preceding paragraph, nothing came to our attention to indicate that Concord College had not complied with the material terms and conditions identified in the first paragraph above of Concord College's Student Financial Assistance Programs.

This report is intended solely for the use of Concord College, the cognizant audit agency and other Federal audit agencies and should not be used for any other purpose.

Respectfully submitted,


Thedford L. Shanklin, CPA, Director
Legislative Postaudit Division

July 22, 1988

Auditors: Michael E. Sizemore, CPA, Supervisor
Leonard H. Lewis, Auditor-in-Charge
Robert E. High
Ronald F. Osmianski

Findings and Recommendations

Lack of Procedure to Identify Irregular Withdrawals

The College does not have procedures in place to identify those individuals who leave without properly withdrawing. It is possible if a student leaves without properly withdrawing that the financial aid office would not be aware of this until the end of the semester. They apparently would only know the student received a grade of "F" for each class in which the student was registered, not that the student left the school without properly withdrawing. Under this system the Student Financial Assistance Programs could be open to misuse by those individuals who are only interested in obtaining Student Financial Assistance awards and then leaving.

We recommend the College institute procedures to identify, on a timely basis, those individuals who leave school without properly withdrawing.

The college is continuing to try and identify students who leave the college and do not withdraw properly. We reported in our last audit, and we continue to follow the same procedures, that if a student does not attend class on a regular basis, the instructor informs Student Special Services. They then attempt to locate the student and counsel them to return to class or inform them of the proper withdrawing procedures. In some cases this counseling will help and students to return to class or withdraw from the college in a proper way. These results are not always positive and students do leave without going through the proper withdrawal procedures. The college will continue to work on this problem area.

Record Maintenance

The College does not maintain a record for each student which reflects the amount, date, check number and other information concerning awards as required by 34 CFR 690.83. 34 CFR 690.83 states in part: "(a) Each institution must maintain adequate records which include the fiscal and accounting records that are required under §690.82 and records indicating - . . . (2) The name, social security number, and amount paid to each recipient, (3) The amount and date of each payment; (4) The amount and date of any overpayment that has been restored to the program account; . . ."

For the Supplemental Educational Opportunity Grant Program, the College does not maintain a record for each student which reflects the amount, date, check number and other information concerning the award. Although not specifically required for this program by the Code of Federal Regulations, as in the case of the Pell Grant Program noted above, this record would provide information concerning an individual student on on document, facilitating external and internal review.

We recommend the College utilize individual student records to reflect all transactions affecting awards.

The college will institute a new comprehensive record for gathering and maintaining information suggested by the auditors.

Institution's Capital Contributions Not Deposited Timely

The College did not match Federal Capital Contributions with Institutional Capital Contributions on a timely basis. However, the College was adequately matched at the end of each program year. This situation existed for all years under audit.

34 CFR §674.21 states, "When an institution deposits any Federal Capital Contribution to its Fund, it must deposit its institutional capital contribution at the same time."

We recommend the College comply with 34 CFR §674.21.

The college will take steps to make its contributions at the same time as it receives its federal contributions.

Part VI - Auditors' Comments on Audit Resolution Matters
Relating to the Student Financial Assistance Programs

The College has taken corrective action on seven of the nine findings from the prior audit report of the Perkins Loan Program (formerly the National Direct Student Loan Program), College Work-Study Program, Supplemental Educational Opportunity Grant Program and the Pell Grant Program (formerly Basic Educational Opportunity Grant program) for the period July 1, 1982 through June 30, 1983.

Areas of Noncompliance

Application and Fiscal Operations Report (ED Form 646)

Cash in Bank for the NDSLSP did not agree with the actual cash. The College had earned interest in the amount of \$444.94 as of June 30, 1983 which they did not report in accordance with 34 CFR 674.19,3.

Action Taken: This interest is not included in the (NDSLSP) Perkins Loan Program. Records have been established to include all interest earned by the Program.

Due Diligence

The College has not fully complied with the requirements for due diligence in collecting from borrowers in the NDSLSP for the following areas:

- A) Supporting evidence establishing due diligence as specified by the Audit Guide, Subpart C, 34 CFR 674.19, 674.42 and 674.44 was not available in all cases.

Action Taken: Upon testing student files in the Test of Student Eligibility, it was determined the College is now following procedures established to comply with 34 CFR 674.19, 674.42 and 674.44.

- B) The College has not maintained a repayment history for the NDSLSP which shows the date, nature and result of each contact with a borrower in the collection of an overdue loan.

Action Taken : Upon testing student files in the Test of Student Eligibility, it was determined the College is maintaining copies of correspondence and notices mailed to borrowers as required by 34 CFR 674.19, d 3ii. Records are updated each time a collection effort is made.

- C) The College has not maintained a monthly listing of payments in arrears in the NDSLSP as required by 34 CFR 674.44.

Action Taken: The (NDSLSP) Perkins Loan Program is now computerized and is capable of providing a monthly listing of payments in arrears as required by 34 CFR 674.44.

- D) There has been no attempt to coordinate efforts between College offices to obtain the most current addresses possible for NDSL borrowers who are delinquent as specified in 34 CFR 674.44, 6 (i).

Action Taken: The College now has the Registrar and other offices, where applicable, provide the most current address to the Perkins Loan Program Accountant when received on a student borrower as required by 34 CFR 674.44, 6 (i).

E) The College has never used the free skip-trace service offered by the Department of Education to locate NDSLPL borrowers as specified in 34 CFR 674.44, 6 (iv).

Action Taken: The College is now utilizing the free skip-trace service offered to Perkins Loan Program (NDSLPL) as required by CFR 674.44, 6 (iv).

Record Maintenance

For the Pell Grant Program, the College does not maintain a record for each student which reflects the amount, date, check number and other information concerning the award as required by 34 CFR 690.83.

For the Supplemental Educational Opportunity Grant Program, the College does not maintain a record for each student which reflects the amount, date, check number and other information concerning the award. Although not specifically required for this program by the Code of Federal Regulations, as in the case of the Pell Grant Program noted above, this record would provide information concerning an individual student on one document, facilitating internal and external review.

Action Taken: None.

Current Situation: For the Pell Grant Program, the College still does not maintain a record for each student which reflects the amount, date, check number and other information concerning the award as required by 34 CFR 690.83.

For the Supplemental Educational Opportunity Grant Program, the College still does not maintain a record for each student which reflects the amount, date, check number and other information concerning the award. Although not specifically required for this program by the Code of Federal Regulations, as in the case of the Pell Grant Program noted above, this record would provide information concerning an individual student on one document, facilitating internal and external review. In the body of our report we recommend the College utilize individual student records to reflect all transactions affecting awards.

Internal Controls and Accounting System

Lack of Procedure to Identify Irregular Withdrawals

The College does not have procedures in place to identify those individuals who leave without properly withdrawing. If a student leaves without properly withdrawing, the financial aid office would not be aware of this until the end of the semester. They would only know that the student received a grade of "F" for each class in which the student was registered, not that the student left the school without withdrawing. This leaves the Student Financial Assistance Programs open to misuse by those individuals who are only interested in obtaining Student Financial Assistance Program awards and then leaving.

Action Taken: None.

Current Situation: The College still does not have procedures in place to identify those individuals who leave without properly withdrawing. If a student leaves without properly withdrawing, the financial aid office would not be aware of this until the end of the semester. They would only know that the student received a grade of "F" for each class in which the student was registered, not that the student left the school without withdrawing. This leaves the Student Financial Assistance programs open to misuse by those individuals who are only interested in obtaining Student Financial Assistance Program Awards and then leaving. In the body of our report we recommend the College institute procedures to identify, on a timely basis, those individuals who leave school without properly withdrawing.

Insufficient Internal Accounting Control Over Cash Receipts
For the National Direct Student Loan Program

The employee who opened the mail containing remittances by check for the National Direct Student Loan Program prepared a prelisting of all receipts. However, that individual did not restrictively endorse such checks and the prelisting was not utilized by an employee independent of the loans clerk to verify proper recording of all cash receipts. In addition, prenumbered cash receipt forms were not used for the National Direct Student Loan Program during the audit period. As of July 1, 1984 the College is using prenumbered cash receipt forms.

Action Taken: The College is now using prenumbered receipt forms in the Perkins Loan Program (NDSLPL). Also, the person who opens the mail prepares a list of the checks received for the PLP, and also places a restrictive endorsement (stamp) upon these checks for deposit into the PLP account.

SUPPLEMENTAL INFORMATION

CONCORD COLLEGE
 SCHEDULE OF DISBURSEMENTS AND EXPENDITURES
 FOR EACH STUDENT FINANCIAL ASSISTANCE PROGRAM
 FOR THE PERIOD JULY 1, 1983 THROUGH JUNE 30, 1987

<u>Disbursements</u>	<u>1987</u>	<u>Year Ended June 30,</u>		<u>1984</u>
		<u>1986</u>	<u>1985</u>	
Perkins Loan Fund	<u>\$309,422.02</u>	<u>\$160,226.26</u>	<u>\$124,637.17</u>	<u>\$143,045.46</u>
<u>Expenditures</u>				
College Work-Study Program	<u>\$360,813.58</u>	<u>\$311,866.15</u>	<u>\$295,850.12</u>	<u>\$331,718.90</u>
Supplemental Educational Opportunity Grant Program	<u>\$148,553.37</u>	<u>\$129,610.00</u>	<u>\$129,610.00</u>	<u>\$134,524.34</u>
Pell Grant Program	<u>\$1,048,717.68</u>	<u>\$1,087,904.78</u>	<u>\$850,977.66</u>	<u>\$743,457.75</u>

Schedule 1

CONCORD COLLEGE
STATEMENT OF CHANGES IN STUDENT FINANCIAL
ASSISTANCE PROGRAMS FUND BALANCES
FOR THE YEAR ENDED JUNE 30, 1987

	<u>Grants and College Work-Study</u>		
	<u>Pell</u>	<u>SEOG</u>	<u>CWS</u>
Additions:			
Federal Awards	\$1,044,857.00	\$129,610.00	\$265,846.00
Other Administrative Cost Allowance Received	<u>3,865.00</u>	<u>-0-</u>	<u>-0-</u>
Total Additions	1,048,722.00	129,610.00	265,846.00
Deductions:			
Grants	1,044,852.68	148,553.37	-0-
Wages	-0-	-0-	313,911.44
FICA Matching	-0-	-0-	1,760.33
Other Benefits	-0-	-0-	1,349.84
Loan Cancellations	-0-	-0-	-0-
Collection Costs	-0-	-0-	-0-
Administrative Expenses	3,865.00	-0-	12,507.50
Defaulted Loan Principal and Interest Assigned to Dept. Ed. Job Location and Development	<u>-0-</u>	<u>-0-</u>	<u>-0-</u>
Total Deductions	1,048,717.68	148,553.37	341,870.21
Other Changes:			
Institutional Matching Funds	-0-	-0-	61,549.76
Non-Institutional Matching Funds	-0-	-0-	8,086.46
Interest	-0-	-0-	-0-
Reimbursement on Loans Cancelled	-0-	-0-	-0-
Transfer Among Programs	-0-	18,943.37	(18,943.37)
Federal Funds in Excess of Authorization	<u>29,138.78</u>	<u>-0-</u>	<u>0.60</u>
Total Other Changes	29,138.78	18,943.37	50,693.45
Net Increase (Decrease) in Fund Balances	29,143.10	-0-	(25,330.76)
Beginning Fund Balance, July 1, 1986	<u>4,532.22</u>	<u>-0-</u>	<u>25,423.06</u>
Ending Fund Balance, June 30, 1987	<u>\$ 33,675.32</u>	<u>\$ -0-</u>	<u>\$ 92.30</u>

<u>Student Loans</u>	
<u>Perkins</u>	<u>Total</u>
\$ 23,713.00	\$1,464,026.00
-0-	3,865.00
23,713.00	1,467,891.00
-0-	1,193,406.05
-0-	313,911.44
-0-	1,760.33
-0-	1,349.84
30,954.50	30,954.50
1,597.07	1,597.07
-0-	16,372.50
65,539.80	65,539.80
-0-	12,341.10
98,091.37	1,637,232.63
1,004.49	62,554.25
-0-	8,086.46
47,695.76	47,695.76
16,600.00	16,600.00
-0-	-0-
-0-	29,139.38
65,300.25	164,075.85
(9,078.12)	(5,265.78)
2,119,344.52	2,149,299.80
\$2,110,266.40	\$2,144,034.02

Schedule 2

CONCORD COLLEGE
STATEMENT OF CHANGES IN STUDENT FINANCIAL
ASSISTANCE PROGRAMS FUND BALANCES
FOR THE YEAR ENDED JUNE 30, 1986

	<u>Grants and College Work-Study</u>		
	<u>Pell</u>	<u>SEOG</u>	<u>CWS</u>
Additions:			
Federal Awards	\$1,083,867.00	\$129,610.00	\$247,226.00
Other Administrative Cost Allowance Received	<u>4,040.00</u>	<u>-0-</u>	<u>-0-</u>
Total Additions	1,087,907.00	129,610.00	247,226.00
Deductions:			
Grants	1,083,864.78	124,451.75	-0-
Wages	-0-	-0-	272,456.59
FICA Matching	-0-	-0-	1,009.05
Other Benefits	-0-	-0-	930.31
Loan Cancellations	-0-	-0-	-0-
Collection Costs	-0-	-0-	-0-
Administrative Expenses	4,040.00	5,158.25	22,441.72
Defaulted Loan Principal and Interest Assigned to Dept. Ed.	-0-	-0-	-0-
Job Location and Development	-0-	-0-	10,254.23
Amounts Returned to Government	<u>-0-</u>	<u>-0-</u>	<u>4,774.25</u>
Total Deductions	1,087,904.78	129,610.00	311,866.15
Other Changes:			
Institutional Matching Funds	-0-	-0-	44,050.24
Non-Institutional Matching Funds	-0-	-0-	5,154.88
Interest	-0-	-0-	-0-
Reimbursement on Loans Cancelled	-0-	-0-	-0-
Federal Funds Not Requested	<u>(3,648.34)</u>	<u>-0-</u>	<u>(8,162.73)</u>
Total Other Changes	<u>(3,648.34)</u>	<u>-0-</u>	<u>41,042.39</u>
Net (Decrease) Increase in Fund Balances	(3,646.12)	-0-	(23,597.76)
Beginning Fund Balance, July 1, 1985	<u>8,178.34</u>	<u>-0-</u>	<u>49,020.82</u>
Ending Fund Balance, June 30, 1986	<u>\$ 4,532.22</u>	<u>\$ -0-</u>	<u>\$ 25,423.06</u>

<u>Student Loans</u> <u>Perkins</u>	<u>Total</u>
\$ 22,002.00	\$1,482,705.00
<u>-0-</u>	<u>4,040.00</u>
22,002.00	1,486,745.00
-0-	1,208,316.53
-0-	272,456.59
-0-	1,009.05
-0-	930.31
55,375.74	55,375.74
5,135.19	5,135.19
-0-	31,639.97
3,149.48	3,149.48
-0-	10,254.23
<u>-0-</u>	<u>4,774.25</u>
63,660.41	1,593,041.34
2,876.10	46,926.34
-0-	5,154.88
40,459.48	40,459.48
11,876.00	11,876.00
<u>-0-</u>	<u>(11,811.07)</u>
<u>55,211.58</u>	<u>92,605.63</u>
13,553.17	(13,690.71)
<u>2,105,791.35</u>	<u>2,162,990.51</u>
<u>\$2,119,344.52</u>	<u>\$2,149,299.80</u>

Schedule 3

CONCORD COLLEGE
STATEMENT OF CHANGES IN STUDENT FINANCIAL
ASSISTANCE PROGRAMS FUND BALANCES
FOR THE YEAR ENDED JUNE 30, 1985

	<u>Grants and College Work-Study</u>		
	<u>Pell</u>	<u>SEOG</u>	<u>CWS</u>
Additions:			
Federal Awards	\$847,171.00	\$129,610.00	\$265,846.00
Other Administrative Cost Allowance Received	<u>3,810.00</u>	<u>-0-</u>	<u>-0-</u>
Total Additions	850,981.00	129,610.00	265,846.00
Deductions:			
Grants	847,167.66	120,468.58	-0-
Wages	-0-	-0-	267,795.97
FICA Matching	-0-	-0-	904.89
Other Benefits	-0-	-0-	1,081.36
Loan Cancellations	-0-	-0-	-0-
Collection Costs	-0-	-0-	-0-
Administrative Expenses	3,810.00	9,141.42	16,480.62
Job Location and Development	<u>-0-</u>	<u>-0-</u>	<u>9,587.28</u>
Total Deductions	850,977.66	129,610.00	295,850.12
Other Changes:			
Institutional Matching Funds	-0-	-0-	63,000.00
Non-Institutional Matching Funds	-0-	-0-	3,062.26
Interest	-0-	-0-	-0-
Reimbursement on Loans Cancelled	-0-	-0-	-0-
Federal Funds in Excess of Authorization	<u>4,682.75</u>	<u>-0-</u>	<u>-0-</u>
Total Other Changes	4,682.75	-0-	66,062.26
Net Increase in Fund Balances	4,686.09	-0-	36,058.14
Beginning Fund Balance, July 1, 1984	<u>3,492.25</u>	<u>-0-</u>	<u>12,962.68</u>
Ending Fund Balance, June 30, 1985	<u>\$ 8,178.34</u>	<u>\$ -0-</u>	<u>\$ 49,020.87</u>

<u>Student Loans</u>	
<u>Perkins</u>	<u>Total</u>
\$ 17,217.00	\$1,259,844.00
<u>-0-</u>	<u>3,810.00</u>
17,217.00	1,263,654.00
-0-	967,636.24
-0-	267,795.97
-0-	904.89
-0-	1,081.36
24,250.57	24,250.57
460.92	460.92
-0-	29,432.04
<u>-0-</u>	<u>9,587.28</u>
24,711.49	1,301,149.27
2,629.10	65,629.10
-0-	3,062.26
29,912.64	29,912.64
24,416.00	24,416.00
<u>-0-</u>	<u>4,682.75</u>
<u>56,957.74</u>	<u>127,702.75</u>
49,463.25	90,207.48
<u>2,056,328.10</u>	<u>2,072,783.03</u>
<u>\$2,105,791.35</u>	<u>\$2,162,990.51</u>

Schedule 4

CONCORD COLLEGE
STATEMENT OF CHANGES IN STUDENT FINANCIAL
ASSISTANCE PROGRAMS FUND BALANCES
FOR THE YEAR ENDED JUNE 30, 1984

	<u>Grants and College Work Study</u>		
	<u>Pell</u>	<u>SEOG</u>	<u>CWS</u>
Additions:			
Federal Awards	\$739,973.00	\$128,532.00	\$265,846.00
Administrative Cost Allowance Received	<u>3,485.00</u>	<u>-0-</u>	<u>-0-</u>
Total Additions	743,458.00	128,532.00	265,846.00
Deductions:			
Grants	739,972.75	128,118.42	-0-
Wages	-0-	-0-	291,228.00
FICA Matching	-0-	-0-	2,079.55
Other Benefits	-0-	-0-	1,557.22
Loan Cancellations	-0-	-0-	-0-
Collection Costs	-0-	-0-	-0-
Administrative Expenses	3,485.00	6,405.92	21,653.79
Job Location and Development	<u>-0-</u>	<u>-0-</u>	<u>9,208.00</u>
Total Deductions	743,457.75	134,524.34	325,726.56
Other Changes:			
Institutional Matching Funds	-0-	-0-	57,289.43
Non-Institutional Matching Funds	-0-	-0-	7,335.27
Interest	-0-	-0-	-0-
Transfer Among Programs	-0-	5,992.34	(5,992.34)
Federal Funds Not Requested	<u>(6,711.48)</u>	<u>-0-</u>	<u>-0-</u>
Total Other Changes	(6,711.48)	5,992.34	58,632.36
Net (Decrease) Increase In Fund Balances	(6,711.23)	-0-	(1,248.20)
Beginning Fund Balance, July 1, 1983	<u>10,203.48</u>	<u>-0-</u>	<u>14,210.88</u>
Ending Fund Balance, June 30, 1984	<u>\$ 3,492.25</u>	<u>\$ -0-</u>	<u>\$ 12,962.68</u>

<u>Student Loans</u>	
<u>Perkins</u>	<u>Total</u>
\$ 20,214.00	\$1,154,565.00
-0-	3,485.00
<hr/>	<hr/>
20,214.00	1,158,050.00
-0-	868,091.17
-0-	291,228.00
-0-	2,079.55
-0-	1,557.22
17,733.30	17,733.30
1,197.66	1,197.66
-0-	31,544.71
-0-	9,208.00
<hr/>	<hr/>
18,930.96	1,222,639.61
1,031.29	58,320.72
-0-	7,335.27
14,256.59	14,256.59
-0-	-0-
-0-	(6,711.48)
<hr/>	<hr/>
15,287.88	73,201.10
16,570.92	8,611.49
<hr/>	<hr/>
2,039,757.18	2,064,171.54
<hr/>	<hr/>
<u>\$2,056,328.10</u>	<u>\$2,072,783.03</u>

Schedule 5

CONCORD COLLEGE
PELL GRANT PROGRAM
BALANCE SHEET AS OF JUNE 30, 1987

Assets

Cash on Hand and in Depository	\$33,613.12
Accounts Receivable:	
Accrued Grant Redeposits	643.20
Accrued Grant Recoveries	1,050.00
Accrued Administrative Allowance	25.00
	<u>1,718.20</u>
Total Assets	<u>\$35,331.32</u>

Liabilities and Fund Balance

Liabilities:	
Accrued Grants to Students Payable	\$ 1,631.00
Accrued Administrative Allowance Payable	25.00
	<u>1,656.00</u>
Fund Balance	<u>33,675.32</u>
Total Liabilities and Fund Balance	<u>\$35,331.32</u>

Schedule 6

CONCORD COLLEGE
SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT PROGRAM
BALANCE SHEET AS OF JUNE 30, 1987

Assets

Cash on Hand and in Depository	\$6,802.43
Accounts Receivable	<u>1,396.90</u>
Total Assets	<u>\$8,199.33</u>

Liabilities and Fund Balance

Liabilities:	
Accrued Awards to Students	\$ 642.70
Accrued Transfers to the CWSP	<u>7,556.63</u>
Total Liabilities	8,199.33
Fund Balance	<u>-0-</u>
Total Liabilities and Fund Balance	<u>\$8,199.33</u>

Schedule 7

CONCORD COLLEGE
COLLEGE WORK-STUDY PROGRAM
BALANCE SHEET AS OF JUNE 30, 1987

Assets

Cash in State Treasury	\$33,340.59
Accounts Receivable:	
Federal Funds Receivable	14,346.60
Matching Contributions Receivable	4,386.00
Redeposit	92.30
Transfer from SEOGP	<u>7,556.63</u>
	26,381.53
 Total Assets	 <u>\$59,722.12</u>

Liabilities and Fund Balance

Liabilities:	
Accrued Wages Payable	\$41,441.09
Accrued Payroll Expenses Payable	906.98
Accrued Administrative Expenses Payable	12,507.50
Accrued Reimbursement to Federal Government	
Due to 1985-86 Award Reduction	<u>4,774.25</u>
 Total Liabilities	 59,629.82
 Fund Balance	 <u>92.30</u>
 Total Liabilities and Fund Balance	 <u>\$59,722.12</u>

Schedule 8

CONCORD COLLEGE
PERKINS LOAN PROGRAM
BALANCE SHEET AS OF JUNE 30, 1987

Assets

Cash in Bank	\$ 115,538.05
Student Loans Receivable	<u>1,994,728.35</u>
Total Assets	<u>\$2,110,266.40</u>

Liabilities and Fund Balance

Liabilities	\$ -0-
Fund Balance:	
Federal Contributions	2,276,197.00
Institutional Contributions	<u>252,911.47</u>
Capital Fund Balance	2,529,108.47
Non-Capital Fund Deficit	<u>(418,842.07)</u>
Total Liabilities and Fund Balance	<u>\$2,110,266.40</u>

Schedule 9

CONCORD COLLEGE
 PERKINS LOAN PROGRAM
 ANALYSIS OF STUDENT LOANS RECEIVABLE
 FOR THE PERIOD JULY 1, 1983 THROUGH JUNE 30, 1987
 AND THE PERIOD SEPTEMBER 3, 1959 THROUGH JUNE 30, 1987

	For the Period September 3, 1959 Through June 30, 1987	Four-Year Period Ended June 30, 1987
Balance, Beginning of Period	\$ -0-	\$1,950,784.80
Funds Advanced to Students	<u>4,718,119.32</u>	<u>728,940.07</u>
Totals	4,718,119.32	2,679,724.87
Less Credits:		
Collections	2,004,280.94	516,288.54
Cancellations:		
Teaching Service	588,692.16	75,432.65
Military Service	3,830.06	800.02
Death	26,059.42	13,994.82
Disability	400.00	-0-
Bankruptcy	37,134.31	26,435.15
Defaulted Loan Principal Assigned/ Referred to and Accepted by the Department of Education	<u>62,994.08</u>	<u>52,045.34</u>
Total Credits	<u>2,723,390.97</u>	<u>684,996.52</u>
Balance, June 30, 1987	<u><u>\$1,994,728.35</u></u>	<u><u>\$1,994,728.35</u></u>

Schedule 10

CONCORD COLLEGE
 PERKINS LOAN PROGRAM
 STATEMENT OF CHANGES IN NON-CAPITAL
 AND CAPITAL FUND BALANCE
 FOUR-YEAR PERIOD ENDED JUNE 30, 1987

<u>Non-Capital Fund Balance</u>	<u>Year Ended June 30,</u>	
	<u>1987</u>	<u>1986</u>
Additions:		
Reimbursement on Loans Cancelled	\$ 16,600.00	\$ 11,876.00
Interest Income on Loans	45,553.07	38,109.87
Other Income	2,142.69	2,349.61
	<u>64,295.76</u>	<u>52,335.48</u>
Total Additions		
Deductions:		
Loan Principal and Interest Cancelled:		
Teaching Service	13,865.69	35,209.48
Military Service	-0-	939.15
Death	-0-	12,423.74
Bankruptcy	17,088.81	6,803.37
Other Collection Costs	1,597.07	5,135.19
Defaulted Loan Principal and Interest Assigned/Referred to and Accepted by the Department of Education	<u>65,539.80</u>	<u>3,149.48</u>
	<u>98,091.37</u>	<u>63,660.41</u>
Total Deductions		
Net (Decrease) Increase for the Period	(33,795.61)	(11,324.93)
Fund Deficit, Beginning of Period	<u>(385,046.46)</u>	<u>(373,721.53)</u>
Fund Deficit, End of Period	<u>(\$418,842.07)</u>	<u>(\$385,046.46)</u>

<u>Capital Fund Balance</u>	<u>Federal</u>	<u>Institutional</u>	<u>Total</u>
Fund Balance, Beginning of Period	\$2,193,051.00	\$245,370.49	\$2,438,421.49
Add Contributions:			
July 1, 1983 - June 30, 1984	20,214.00	1,031.29	21,245.29
July 1, 1984 - June 30, 1985	17,217.00	2,629.10	19,846.10
July 1, 1985 - June 30, 1986	22,002.00	2,876.10	24,878.10
July 1, 1986 - June 30, 1987	<u>23,713.00</u>	<u>1,004.49</u>	<u>24,717.49</u>
Fund Balance, End of Period	<u>\$2,276,197.00</u>	<u>\$252,911.47</u>	<u>\$2,529,108.47</u>

<u>Year Ended June 30.</u>	
<u>1985</u>	<u>1984</u>
\$ 24,416.00	\$ -0-
22,560.34	14,256.59
<u>7,352.30</u>	<u>-0-</u>
54,328.64	14,256.59
19,117.61	14,512.61
-0-	-0-
2,200.00	-0-
2,932.96	3,220.69
460.92	1,197.66
<u>-0-</u>	<u>-0-</u>
<u>24,711.49</u>	<u>18,930.96</u>
29,617.15	(4,674.37)
<u>(403,338.68)</u>	<u>(398,664.31)</u>
<u>(\$373,721.53)</u>	<u>(\$403,338.68)</u>

Schedule 11

CONCORD COLLEGE
 PERKINS LOAN PROGRAM
 COMPUTATION OF DEFAULT RATE
 AS OF JUNE 30, 1987
 (CUMULATIVE INFORMATION)

Principal Outstanding on Loans in Default

Total Amount Advanced on Loans in Default	\$ 442,313.00
Deduct: Principal Amount Repaid or Cancelled	<u>60,179.00</u>
Total Remaining Principal Amount Which Has Not Been Paid, Cancelled, or Assigned on Notes in Default	<u>\$ 382,134.00</u>

Total Amount of Matured Principal

Total Amount Advanced - All Borrowers	\$4,718,119.00
Deduct: Amount Not in Repayment Status:	
Student Status	341,045.00
Grace Period (Armed Forces, Peace Corps, Vista, Hardship)	<u>108,413.00</u>
Total Amount Not in Repayment Status	<u>449,458.00</u>
Total Amount of Matured Principal	<u>\$4,268,661.00</u>
Percentage of Loans in Default (\$382,134.00 ÷ \$4,268,661.00)	8.95%

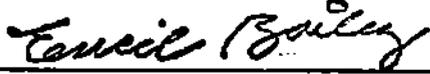
Schedule 12

STATE OF WEST VIRGINIA

OFFICE OF LEGISLATIVE AUDITOR, TO WIT:

I, Encil Bailey, Legislative Auditor, do hereby certify that the report of audit appended hereto was made under my direction and supervision, under the provisions of the West Virginia Code, Chapter 4, Article 2, as amended, and that the same is a true and correct copy of said report.

Given under my hand this 17th day of October, 1988.


Encil Bailey, Legislative Auditor

Copy forwarded to the Commissioner of the Department of Finance and Administration to be filed as a public record. Copies forwarded to the U.S. Department of Education; Concord College; West Virginia Board of Regents; Governor; Attorney General; and, State Auditor.