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TAX, AUDIT AND BUSINESS CONSULTANTS
RETIRED
GORDON A. NETHERCUT. C.P.A.

To the Board of Trustees Alpena Community College Alpena, Michigan

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

We have audited the basic financial statements of Alpena Community College, Alpena, Michigan, as of and for the year ended June 30, 2012, and have issued our report thereon dated September 18, 2012. We conducted our audit 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.

Internal Control Over Financial Reporting

Management of Alpena Community College, Alpena, Michigan, is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our audit, we considered Alpena Community College, Alpena, Michigan's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Alpena Community College, Alpena, Michigan's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Alpena Community College, Alpena, Michigan's internal control over financial reporting.

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.

Our consideration of internal control over financial reporting 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 financial reporting that might be deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Alpena Community College, Alpena, Michigan's financial statements are free of 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 determination of financial statement amounts. 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*.

We noted certain matters that we reported to management of Alpena Community College, Alpena, Michigan, in a separate letter dated September 18, 2012.

This report is intended solely for the information and use of management, the College Board of Trustees, others within the entity, and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

Straley, Islay & Lamp P.C.

September 18, 2012



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TAX, AUDIT AND BUSINESS CONSULTANTS

RETIRED
GORDON A. NETHERCUT, C.P.A.

To the Board of Trustees Alpena Community College Alpena, Michigan

INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133 AND SUPPLEMENTARY SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE.

Compliance

We have audited Alpena Community College, Alpena, Michigan's compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of Alpena Community College, Alpena, Michigan's major federal programs for the year ended June 30, 2012. Alpena Community College, Alpena, Michigan's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts, and grants applicable to each of its major federal programs is the responsibility of Alpena Community College, Alpena, Michigan's management. Our responsibility is to express an opinion on Alpena Community College, Alpena, Michigan's compliance based on our audit.

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 OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 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 Alpena Community College, Alpena, Michigan'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. Our audit does not provide a legal determination of Alpena Community College, Alpena, Michigan's compliance with those requirements.

In our opinion, Alpena Community College, Alpena, Michigan, complied, in all material respects, with the 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, 2012.

Internal Control over Compliance

Management of Alpena Community College, Alpena, Michigan, is responsible for establishing and maintaining effective internal control over compliance with the requirements of laws, regulations, contracts, and grants applicable to federal programs. In planning and performing our audit, we considered Alpena Community College, Alpena, Michigan's internal control over compliance with the requirements that could have a direct and material effect on a major federal program to determine the auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, 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 Alpena Community College, Alpena, Michigan'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.

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 deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

Schedule of Expenditures of Federal Awards

We have audited the basic financial statements of Alpena Community College, Alpena, Michigan, as of and for the year ended June 30, 2012, and have issued our report thereon dated September 18, 2012, which contained unqualified opinions on those financial statements. Our audit was performed for the purpose of forming opinions on the financial statements as a whole. The schedule of expenditures of federal awards is presented for the purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, and is not a required part of the financial statements. 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 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 financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

This report is intended solely for the information and use of management, the College Board of Trustees, others within the entity, federal awarding agencies, and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

Straley, Itsley & Lamp P.C.

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Alpena Community College SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE

For the year ended June 30, 2012

Federal Grantor/Pass Through Grantor/Program Title	Federal CFDA Number	Pass-Through Grantor's Number	Program or Award Amount
U.S. Department of Labor			
Direct Programs: Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grants Total U.S. Department of Labor	* 17.282	TC-22515-ESO	\$ 2,835,000 2,835,000
National Endowment for the Humanities			
Direct Programs:			
Education and Human Resources Sustainability on Concrete Technology	47.076	DUE-1103676	200,000
			200,000
Promotion of the Humanities - Professional Development Shipwrecks and Maritime Landscapes of the Great Lakes	45.163	BI-50128-10	124,192
			124,192
Total National Endowment for the Humanities			324,192
U.S. Department of Education Direct Programs: Student Financial Assistance Programs Cluster Federal Supplemental Educational Opportunity Grants	* 84.007		
(FSEOG) 2011/2012		P007A111973	51,908 51,908
Federal Work-Study Program	* 84.033		· · · · · · · · · · · · · · · · · · ·
(FWS) 2006/2007 (FWS) 2008/2009 (FWS) 2010/2011 (FWS) 2011/2012	0000	P033A061973 P033A081973 P033A101973 P033A111973	85,768 81,522 81,522 94,857 343,669
Federal Pell Grant Program (PELL) 2010/2011 (PELL) 2011/2012 (PELL) Administration 2009/2010 (PELL) Administration 2010/2011 (PELL) Administration 2011/2012	* 84.063	P063P101622 P063P111622 P063Q091622 P063Q101622 P063Q111622	5,420,816 4,715,129 6,880 7,695 6,860 10,157,380

^{*} Major Program

Revenue Accrued (Deferred) at June 30, 2011	Prior Year(s) Expenditures	Currer Receipts	Current Year (Deferred) at June 30, 2012		Current Year (Deferred) at		Current Year (Deferred) at Tota		Total Expenditures
\$ - 	\$ - 	\$ 346,945 346,945	\$ 358,496 358,496	\$ 11,551 11,551	\$ 358,496 358,496				
		46,565	54,494	7,929	54,494				
		46,565	54,494	7,929	54,494				
1,696	1,696	114,924	113,228		114,924				
1,696	1,696	114,924	113,228		114,924				
1,696	1,696	161,489	167,722	7,929	169,418				
<u> </u>	<u>-</u>	51,908 51,908	51,908 51,908	<u>.</u> .	51,908 51,908				
- - - - -	74,750 77,907 78,458 	11,018 3,615 3,064 70,055 87,752	11,018 3,615 3,064 70,055 87,752	- - - - - -	85,768 81,522 81,522 70,055 318,867				
(4,184) - - - - - (4,184)	5,420,816 20,000 6,875 7,380 - 5,455,071	(4,184) 4,691,290 5 315 6,860 4,694,286	4,695,129 5 315 6,860 4,702,309	3,839 - - - - 3,839	5,420,816 4,715,129 6,880 7,695 6,860 10,157,380				

Alpena Community College SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE

For the year ended June 30, 2012

Federal Grantor/Pass Through Grantor/Program Title	Federal CFDA Number	Pass-Through Grantor's Number	Program or Award Amount
U.S. Department of Education (continued)			
Direct Programs:			
(Direct Loan) 2010/2011 Federal Direct - Subsidized Federal Direct - Unsubsidized Federal Direct - Plus	* 84.268	P268K111622	\$ 3,091,984
			3,091,984
(Direct Loan) 2011/2012 Federal Direct - Subsidized Federal Direct - Unsubsidized Federal Direct - Plus	* 84.268	P268K121622	3,347,814
redefal blioot i las			3,347,814
Total Student Financial Assistance Programs Cluster			16,992,755
Total Student Financial Assistance Flograms Cluster			10,992,733
TRIO Cluster:			
TRIO - Student Support Services	* 84.042	P042A071066	1,094,541
TRIO - Student Support Services	* 84.042	P042A110358	268,611
			1,363,152
TRIO - Talent Search	* 84.044	P044A080544	1,295,184
TRIO - Talent Search	* 84.044	P044A110158	230,000
			1,525,184
TRIO - Upward Bound	* 84.047	P047A080123	1,435,873
			1,435,873
Total TRIO Cluster			4,324,209
Total Direct Programs			21,316,964
Passed through Michigan Department of Energy, Labor			
and Economic Growth:			
Career and Technical Education	84.048A	440050 44054	40.004
Local leadership Local leadership		113250 11251 113510 11211	18,384 170,605
Local leadership		123250 12251	18,199
Local leadership		123510 12211	134,484
CAP Leadership		103670 11241	27,590
			369,262
Total U.S. Department of Education			21,686,226
Total Federal Financial Assistance			\$ 24,845,418

^{*} Major Program

Revenue Accrued (Deferred) at June 30, 2011			Prior Year(s)		Current Receipts						Total
Jun	e 30, 2011	EX	Expenditures						- Ouric 30, 2012		xpenditures
\$	5,535 (306)	\$	2,076,175 1,008,532 2,926	\$	9,123 457 -	\$	3,588 763	\$	- - -	\$	2,079,763 1,009,295 2,926
	5,229		3,087,633		9,580		4,351		-		3,091,984
	- - -		- - -		1,917,253 1,084,185 23,754 3,025,192		1,980,096 1,130,505 23,754 3,134,355		62,843 46,320 - 109,163		1,980,096 1,130,505 23,754 3,134,355
	<u>-</u> _								<u> </u>		3,134,333
	1,045		8,773,819		7,868,718		7,980,675		113,002		16,754,494
	1,697 -		972,797		41,705 228,830		40,008 231,377		- 2,547		1,012,805 231,377
	1,697		972,797		270,535		271,385		2,547		1,244,182
	1,823		943,889		256,729 183,870		239,052 194,853		(15,854) 10,983		1,182,941 194,853
	1,823		943,889		440,599		433,905		(4,871)		1,377,794
	1,943		1,028,287		363,738		359,287		(2,508)		1,387,574
	1,943		1,028,287		363,738		359,287		(2,508)		1,387,574
	5,463		2,944,973		1,074,872		1,064,577		(4,832)		4,009,550
	6,508		11,718,792		8,943,590		9,045,252		108,170		20,764,044
	- 31,344 -		18,384 151,367 -		(464) 31,344 17,682		(464) - 17,796		- - 114		17,920 151,367 17,796
	- 26,769		- 26,769		47,776 26,769		131,076		83,300		131,076 26,769
	58,113		196,520		123,107		148,408		83,414		344,928
	64,621		11,915,312		9,066,697		9,193,660		191,584		21,108,972
	- 1		,,		-,		-,,		- 1		, , , , , , , =
\$	66,317	\$	11,917,008	\$	9,575,131	\$	9,719,878	\$	211,064	\$	21,636,886

NOTES TO SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE

NOTE 1--SIGNIFICANT ACCOUNTING POLICIES.

A. BASIS OF PRESENTATION

The accompanying schedule of federal financial assistance (the Schedule) includes the federal grant activity of all federal financial assistance programs of Alpena Community College, Alpena, Michigan, under programs of the federal government for the year ended June 30, 2012. The information in this Schedule is presented in accordance with the requirements of the Office of Management and Budget OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations.* In addition, expenditures reported on the Schedule are recognized following the cost principals contained in OMB Circular A-87, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Therefore, some amounts presented in this Schedule may differ from amounts presented in, or used in the preparation of the basic financial statements.

The Alpena Community College, Alpena, Michigan's reporting entity is defined in Note 1 to the College's financial statements. Expenditures reported on the schedule are reported on the same basis of accounting as the basic financial statements. Because the Schedule presents only a selected portion of the operations of Alpena Community College, Alpena, Michigan, it is not intended to and does not present the financial position, changes in net assets, or cash flows, if applicable of Alpena Community College, Alpena, Michigan. All federal financial assistance received directly from federal agencies as well as federal financial assistance passed through other governmental agencies is included on the schedule. Pass through indentifying numbers are presented where available.

The Office of Management and Budget OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations* established a risk-based approach to determine which Federal programs were major programs. This risk-based approach included consideration of current and prior audit experience, oversight by Federal agencies and pass-through entities, and the inherent risk of the Federal program. Major program determination was performed and is defined in Section 520 of the circular.

For the audit period ended June 30, 2012 the Alpena Community College, Alpena, Michigan's dollar threshold for larger Federal programs, which were regarded as Type A programs, were programs with Federal awards expended during the audit period which exceeded \$300,000. All other Federal programs were regarded as Type B programs. For the year ended June 30, 2012, Alpena Community College, Alpena, Michigan qualified as a low-risk auditee as defined in Section 530 of the circular. No federal programs were considered to be high-risk and the determination was made that major programs were all Type A programs to encompass at least 25% of the total federal awards and clusters expended. During the year ended June 30, 2012, the Alpena Community College, Alpena, Michigan expended 96.7% of its total expenditures of Federal Awards programs audited as Major Programs.

B. CFDA

This refers to the Catalog of Federal Domestic Assistance.

C. RECEIPTS

Current year receipts represent cash/payments-in-kind received from Federal sources during the period July 1, 2011 through June 30, 2012.

NOTES TO SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE

NOTE 2--RECONCILIATION TO U.S. DEPARTMENT OF EDUCATION GRANT ADMINISTRATION AND PAYMENT SYSTEM PAYMENT REQUESTS (GAPS).

The following shows a reconciliation the Total Direct Programs of the U.S. Department of Education reported on the Schedule of Federal Financial Assistance to U.S. Department of Education Grant Administration and Payment System Payment Requests (GAPS).

Current year expenditures of direct U.S. Department of Education Programs Accounts receivable - June 30, 2011 Accounts receivable - June 30, 2012	\$ 9,045,252 6,508 (108,170)
Total grant payment requests	\$ <u>8,943,590</u>
(GAPS) Drawdowns	\$ <u>8,943,590</u>

NOTE 3--RECONCILIATION TO MICHIGAN DEPARTMENT OF EDUCATION GRANT SECTION AUDITORS REPORT.

The following shows a reconciliation of current year expenditures per the Schedule of Federal Financial Assistance to current payments per Michigan Department of Education Grant Auditor Report (GAR) from the Cash Management System (CMS):

Current year expenditures passed through Michigan Department of Education:	
U.S. Department of Education Programs	\$ 148,408
Accounts receivable - June 30, 2011	58,113
Accounts receivable - June 30, 2012	<u>(83,414</u>)
Total grant payment requests	\$ <u>123,107</u>
Agency total current payments per MDE Grant Auditor Report	\$ <u>123,107</u>

NOTES TO SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE

NOTE 4--RELATIONSHIP TO BASIC FINANCIAL STATEMENTS.

Revenues from federal sources are reported in the College's financial statements as follows:

	Federal <u>Revenues</u>
General Fund Restricted Fund	\$ 7,649 <u>6,422,252</u>
Total Federal Revenues	6,429,901
Federal grant revenues from program income, receivables and refunds not reported in the audited financial statements at June 30, 2012 and reported in the Schedule of Federal Financial Assistance	2,863
Federal Vocational Education Program, C.F.D.A. #84.048 previously reported as State grants in the audited financial statements at June 30, 2012	148,408
Federal (Direct Loan) Programs, C.F.D.A. #84.268 previously not reported in the audited financial statements at June 30, 2012	<u>3,138,706</u>
Expenditures per Schedule of Federal Financial Assistance	\$ <u>9,719,878</u>

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

For the year ended June 30, 2012

Section I - SUMMARY OF AUDITOR'S RESULTS.

- 1. The Auditors' report expresses an unqualified opinion on the basic financial statements of Alpena Community College.
- 2. No reportable conditions relating to the audit of the financial statements are reported in the 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.
- 3. The results of our tests disclosed no instances of noncompliance material to the financial statements of Alpena Community College that are required to be reported under Government Auditing Standards.
- 4. No reportable conditions in internal control over Major Programs are reported in the Report on Compliance with Requirements Applicable to each Major Program and Internal Control Over Compliance in Accordance with OMB Circular A-133 and Supplementary Schedule of Federal Financial Assistance.
- 5. The Auditors' Report on Compliance for Major Programs expresses an unqualified opinion.
- 6. The Auditors' Report disclosed no instances of findings relative to the Major Federal Award Programs required to be reported under OMB Circular A-133.
- 7. Programs tested as major programs:
 - U.S. Department of Labor:

CFDA 17.282 - Trade Adjustment Assistance Community College and Career Training

U.S. Department of Education - Federal Student Aid Cluster:

CFDA 84.007 - Federal Supplemental Educational Opportunity Grant Program (SEOG)

CFDA 84.032 - Federal Family Education Loan Program (FFEL)

CFDA 84.033 - Federal Work-Study Program (FWS)

CFDA 84.063 - Federal Pell Grant Program (PELL)

CFDA 84.275 – Federal Direct Student Loans (Direct Loan)

CFDA 84.375 - Federal Academic Competitiveness Grants (ACG)

U.S. Department of Education - Trio Cluster:

CFDA 84.042 - TRIO - Student Support Services

CFDA 84.044 - TRIO -Talent Search

CFDA 84.047 - TRIO- Upward Bound

The threshold for distinguishing Type A and Type B Programs was \$300,000.

8. Alpena Community College qualified as a low-risk auditee under criteria in Section 530 of (OMB) Circular A-133.

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

For the year ended June 30, 2012

SECTION II - SUMMARY OF FINDINGS RELATING TO THE FINANCIAL STATEMENTS.

There were no findings or questioned costs related to the financial statements which are required to be reported under generally accepted government auditing standards for the year ended June 30, 2012.

SECTION III - FINDINGS AND QUESTIONED COSTS OF MAJOR FEDERAL AWARD PROGRAMS.

There were no findings or questioned costs related to major federal award programs for the year ended June 30, 2012.

INDEPENDENT AUDITORS' COMMENTS ON AUDIT RESOLUTION MATTERS RELATING TO THE SFA PROGRAMS

For the year ended June 30, 2012

PRIOR FINDINGS AND QUESTIONED COSTS OF MAJOR FEDERAL AWARD PROGRAMS.

There were no findings or questioned costs related to the major federal award programs for the year ended June 30, 2012.

ATTACHMENT A - AUDITOR INFORMATION SHEET

Alpena Community College 665 Johnson Street Alpena, MI 49707

Entity No.: 1-38-3210748-A1 Telephone: (989) 356-9021 Fax: (989) 356-0980

President: Dr. Olin H. Joynton

Contact Person: Richard Sutherland, Vice President for Administration and Finance

Lead Auditor: Mark L. Sandula, CPA Firm Name: Straley, Ilsley & Lamp P.C.

Address: P.O. Box 738

Alpena, Michigan 49707

License No.: 1101010225 Telephone: (989) 356-4531

Fax: (989) 356-0494

Student Financial Assistance Programs:

Federal Supplemental Educational Opportunity Grant Program (FSEOG) - 84.007

Federal Work Study (FWS) - 84.033 Federal Pell Grant Program (Pell) - 84.063

Federal Direct Student Loans (Direct Loan) - 84.268

Report filing status: original submission

The campuses/ facilities considered as part of this institution are as follows:

<u>Location</u> <u>Description of facility</u>

665 Johnson Main Campus

Alpena, MI SFA's & Controller's Office

Note: Even though the College has a branch location, Huron Shores Campus, all accounting

and administrative controls of SFA programs are located at the main campus listed above.

Institution's Accrediting Organization: North Central Association of Colleges and Schools, Commission on Institutions of Higher Education.

Records for the accounting and administration of the SFA Programs are located at:

Alpena Community College Main Campus 665 Johnson Street Alpena, MI 49707

The most recent annual audited financial statements were for the fiscal year ended June 30, 2012. An unqualified opinion was expressed.

UNISA, INC.

7400 E. Arapahoe Rd., Suite 10 Englewood, CO 80112-1279

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Email: cust-svc@unisainc.com

DIVISION OF RESPONSIBILITY FOR COMPLIANCE REQUIREMENTS

	Responsibility of	Responsibility of	Explanation of Divided
Compliance requirement	Institution	UNISA, INC.	Responsibility
 I. Computer operations A. Terminal and software security B. Data integrity C. System and data backup D. Disaster recovery plan 		X X X	
II. Cash managementA. DrawdownsB. Authorization vs. expendituresC. Reconcile general ledger to bankD. Bank account notes federal funds	X X X		
III. Financial reports A. FISAP B. EDPMTS/EDCAPS C. Pell IPS	X X	X	
 IV. Institutional eligibility A. Participation agreement/ECAR B. Accreditation status C. Admissions policy D. Eligible programs E. Calculation on institutional eligibility ratios F. Licenses G. Administrative capability items 	X X X X X		
 V. Student eligibility A. High school diploma or equivalent or ability to benefit B. Regularly enrolled in eligible program C. Citizen or permanent resident D. Satisfactory progress E. Default/refund status F. Social security number match requirement G. Other requirements 	X X X X X		
 VI. Coordination of programs A. Financial aid organization B. Other information available C. Needs analysis D. Professional judgment documentation 	X X X		

UNISA, INC.

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DIVISION OF RESPONSIBILITY FOR COMPLIANCE REQUIREMENTS

Compliance requirement	of	Responsibility of UNISA, INC.	of Divided
Compliance requirement	<u>Institution</u>	UNISA, INC.	Responsibility
VII. Administrative capability A. Student file maintenance B. Record retention C. Verification	X X X		
VIII. Disbursements A. Financial aid transcripts/NSLDS information B. Independent/Dependent status determination C. Timing and amount of disbursements	X X X		
 IX. Refunds or overpayments A. Policy B. Refund calculations C. Overpayment calculations D. Disbursement and accounting for refunds/overpayments 	X X X		
X. Institutional disclosureA. Accuracy of institutional dataB. Disclosure to students	X X		
 XI. Pell Grant A. Types of expenditures allowed B. Program performance 1. Program expenditures 2. Timing of payment; cutoff dates for receipts of SAR's C. Financial reports 	N/A		
XII. Campus-based programs (general) A. Types of expenditures allowed 1. Program expenditures 2. Administrative cost allowance B. Program performance 1. Accuracy of FISAP data 2. System of need analysis	X X X		

UNISA, INC.

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2. Refunds to lenders

DIVISION OF RESPONSIBILITY FOR COMPLIANCE REQUIREMENTS

DIVISION OF RESPONSIBILITY FOR COMPE	IANCE REQUIR	LIVILIVIO	
	Responsibility of	Responsibility of	Explanation of Divided
Compliance requirement	<u>Institution</u>	UNISA, INC.	Responsibility
XIII. Campus-based programs (Perkins)			
A. Type of expenditures allowed	X		
B. Matching	X		
C. Program performance			
Student eligibility	X		
Approved promissory note	X		
3. Due diligence		X	
Repayment records		X	
D. Special compliance requirements			
 Minimum cash balance; cash planning 	X		
2. Treatment of interest earned on Perkins loan balance	X		
XIV. Campus-based programs (FSEOG)	N/A		
A. Eligible expenditures			
B. Matching			
C. Selection of students for FSEOG awards			
XV. Campus-based programs (FWS)	N/A		
A. Types of expenditures and employment allowed			
Types of employment allowed			
Types of expenditures allowed			
B. Matching			
C. Program performance			
 Selection of students for employment 			
Approval of time sheets and payment to students			
D. Special compliance requirements			
JLD And CSJLD programs			
2. CSL programs (5% min.)			
XVI. Federal Family Education Loans (FFEL)	N/A		
A. Program performance			
 Determination of eligibility and completion of application 			
Default reduction measures			
Entrance and exit counseling			
Loan disbursement			
EFT Roster reconciliation			
Eligibility for disbursement			
B. Status reporting			
SSCR completion			
Change in enrollment status			
C. Special compliance requirements			
Refund policy Refunds to learning			

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XVII Federal Direct Loan Programs (FDLP)

N/A

- A. Program performance
 - 1. Determination of eligibility
 - 2. Entrance and exit counseling
 - 3. Exporting and importing electronic files to/from the LOC
 - 4. Loan disbursement
 - 5. Monthly data matching including:
 - a. Loan and cash detail records
 - b. Summary reporting
- B. FDLP Status reporting
 - 1. SSCR's
 - 2. Change in enrollment status