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STEVE J. THERIOT, CPA

DIRECTOR OF FINANCIAL AUDIT

THOMAS H. COLE, CPA

Under the provisions of state law, this report is a public document. A copy of this report has been submitted to the Governor, to the Attorney General, and to other public officials as required by state law. A copy of this report has been made available for public inspection at the Baton Rouge office of the Legislative Auditor.

This document is produced by the Legislative Auditor, State of Louisiana, Post Office Box 94397, Baton Rouge, Louisiana 70804-9397 in accordance with Louisiana Revised Statute 24:513. Six copies of this public document were produced at an approximate cost of \$15.78. This material was produced in accordance with the standards for state agencies established pursuant to R.S. 43:31. This report is available on the Legislative Auditor's Web site at www.lla.state.la.us. When contacting the office, you may refer to Agency ID No. 7273 or Report ID No. 05001033 for additional information.

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OFFICE OF LEGISLATIVE AUDITOR STATE OF LOUISIANA BATON ROUGE, LOUISIANA 70804-9397

1600 NORTH THIRD STREET POST OFFICE BOX 94397 TELEPHONE: (225) 339-3800 FACSIMILE: (225) 339-3870

May 4, 2006

LOUISIANA TECHNICAL COLLEGE LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM STATE OF LOUISIANA Baton Rouge, Louisiana

As part of our audit of the Louisiana Community and Technical College System's financial statements for the year ended June 30, 2005, we considered the Louisiana Technical College's internal control over financial reporting; we examined evidence supporting certain accounts and balances material to the System's financial statements; and we tested the college's compliance with laws and regulations that could have a direct and material effect on the System's financial statements as required by *Government Auditing Standards*. In addition, we considered the college's internal control over compliance with requirements that could have a direct and material effect on a major federal program, as defined in the Single Audit of the State of Louisiana, and we tested the college's compliance with laws and regulations that could have a direct and material effect on the major federal programs as required by U.S. Office of Management and Budget Circular A-133.

The Annual Fiscal Report of the Louisiana Technical College is not audited or reviewed by us, and, accordingly, we do not express an opinion on that report. The college's accounts are an integral part of the Louisiana Community and Technical College System's financial statements, upon which the Louisiana Legislative Auditor expresses an opinion.

In our prior management letter on the Louisiana Technical College for the year ended June 30, 2004, we reported a finding relating to inadequate control over Pell Grant. The finding relating to inadequate control over Pell Grant is addressed again in this letter.

Based on the application of the procedures referred to previously, all significant findings are included in this letter for management's consideration. All findings included in this management letter that are required to be reported by *Government Auditing Standards* will also be included in the State of Louisiana's Single Audit Report for the year ended June 30, 2005.

Unlocated and Stolen Movable Property

The Louisiana Technical College (LTC) identified unlocated movable property items at the Chancellor's Office and 34 of its 40 campuses totaling \$1,004,561 as a result of its annual property inventory procedures. Of that amount, items totaling \$140,561 were removed from the property records because they had not been located for three consecutive years. Furthermore, the amount of unlocated computers and computer-related equipment totaled \$555,684 or 55% of the total unlocated property. In addition to

the unlocated property, five campuses reported thefts of movable property totaling \$74,892.

Louisiana Revised Statute 39:325 requires entities to conduct an annual inventory of movable property and report any unlocated items to the Louisiana Property Assistance Agency (LPAA). Louisiana Administrative Code 34.VII.313 states, in part, that efforts must be made to locate all movable property for which there are no explanations available for their disappearance. In addition, good internal control dictates that assets are properly monitored to safeguard against loss or theft and that thorough periodic physical counts of property inventory be conducted. During fiscal year 2005, each of the 40 LTC campuses and the Chancellor's Office submitted their annual certifications of property inventory to the LPAA according to their individual due dates. These certifications disclosed \$63,267,762 in total movable property administered by LTC.

Although LTC has policies and procedures governing movable property, management has not placed sufficient emphasis on maintaining adequate controls over the safeguarding of its movable property. Failure to maintain adequate controls over movable property increases the risk of loss arising from unauthorized use of property and subjects LTC to noncompliance with state laws and regulations. Because of the nature of the services provided by LTC, the risk exists that sensitive information could be improperly recovered from the missing computers and/or computer-related equipment.

Management of LTC should strengthen its controls over safeguarding its movable property and devote additional efforts to locating movable property reported as unlocated in previous years. Management concurred with the finding and recommendation and outlined a plan for corrective action (see Appendix A, page 1).

Inadequate Control Over Pell Grant

For the fourth consecutive year, LTC has inadequate internal control over refunds and returns of overpayments of the Federal Pell Grant Program (CFDA 84.063). The Code of Federal Regulations (34 CFR 668.22) requires that a refund of Pell funds be made as soon as possible but no later than 30 days after the date of the institution's determination that the student withdrew. Furthermore, 34 CFR 668.21 requires that an institution return overpayments resulting from Pell checks issued but not picked up by students who subsequently withdrew, dropped out, or were expelled before the first day of class (void transactions). Although the regulations do not give a specific time for returning overpayments resulting from these void transactions, LTC's policy states that the campus should submit a void form and the original check to be voided for each student that does not pick up his/her Pell check within 30 days of the date of the check.

Pell refunds and returns of overpayments are initiated at the individual LTC campuses and sent to the LTC central office, which then credits the Pell account and remits the funds to the U.S. Department of Education (DOE). In a test of Pell refunds and void transactions initiated during fiscal year 2005, we noted the following:

- Out of 490 students, 209 (43%) had voided Pell checks (void transactions) totaling \$272,695 that were not returned to the DOE until 31 to 881 days after the checks were issued for an average of 88 days after the date of issue.
- Seven of 16 students (44%) had Pell checks totaling \$1,437 that were not remitted to the DOE until 40 to 84 days after the date of determination of the students' withdrawal for an average of 49 days.
- Four of 14 students (29%) had the incorrect Date of Determination of Withdrawal on the return forms.

Failure to adequately control Pell refunds and returns of overpayments has caused LTC to be in noncompliance with federal program requirements. Management of LTC should ensure that its policies are followed and that Pell refunds and returns of overpayments from void transactions are remitted timely to the DOE. Management concurred with the finding and recommendation and outlined a plan of corrective action (see Appendix A, pages 2-9).

Inadequate Internal Control Over Temporary Assistance for Needy Families

LTC failed to maintain adequate controls over reimbursement requests (billings) submitted for the Temporary Assistance for Needy Families (TANF) program (CFDA 93.558). Good internal control requires that program personnel maintain an adequate understanding of program requirements and should review reimbursement requests and supporting documentation before submission to the grantor to ensure that all expenses claimed are allowable for reimbursement.

In our test of TANF billings at five LTC campuses during fiscal year 2005, we found that three campuses over-billed the program for unallowable expenses as follows:

Alexandria campus	\$7,668
Sullivan campus	4,125
T.H. Harris campus	75
Total	\$11,868

These over-billings resulted from a lack of knowledge of program requirements by program personnel and from errors in preparing reimbursement requests. Before yearend, LTC reduced subsequent invoices to repay these over-billings. However, failure to ensure that all billed expenses are allowable could subject LTC to noncompliance with program requirements and result in disallowed costs. Management of LTC should adequately communicate program requirements to applicable program personnel and should establish procedures for an adequate review of reimbursement requests to ensure that all billed expenses are allowable for reimbursement. Management concurred with the finding and recommendation and outlined a plan for corrective action (see Appendix A, page 10).

The recommendations in this letter represent, in our judgment, those most likely to bring about beneficial improvement to the operations of the college. The varying nature of the recommendations, their implementation costs, and their potential impact on the operations of the college should be considered in reaching decisions on courses of action. Findings relating to the college's compliance with applicable laws and regulations should be addressed immediately by management.

This letter is intended for the information and use of the college and its management and is not intended to be, and should not be, used by anyone other than these specified parties. Under Louisiana Revised Statute 24:513, this letter is a public document, and it has been distributed to appropriate public officials.

Respectfully submitted,

evel. Theriot, CPA

Legislative Auditor

AD:BQD:THC:ss

[LTC05]

Management's Corrective Action Plans and Responses to the Findings and Recommendations



CAMPUSES:

Acadian Alexandria Ascension Avoyelles Bastrop **Baton Rouge** Charles B. Coreil Delta Ouachita Evangeline Florida Parishes Folkes Gulf Area Hammond Area Huey P. Long Jefferson Jumonville Memorial Lafayette Lafourche Lamar Salter Mansfield Morgan Smith Natchitoches North Central Northeast Louisiana Northwest Louisiana Oakdale **River Parishes** Ruston Sabine Valley Shelby M. Jackson Shreveport Bossier Sidney N. Collier Slidell Sullivan T. H. Harris Tallulah Teche Area West Jefferson Westside Young Memorial

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LOUISIANA TECHNICAL COLLEGE Office of the Chancellor

Margaret Montgomery-Richard, Ph.D., Chancellor

150 Third Street – Suite 200 Baton Rouge, LA 70801-1303 Telephone: (225) 219-0000 Fax: (225) 219-9497

January 11, 2006

Steve J. Theriot, CPA Legislative Auditor 1600 North Third Street P.O. Box 94397 Baton Rouge, LA 70804-9397

Re: Unlocated and Stolen Movable Property

Dear Mr. Theriot,

Management of Louisiana Technical College (LTC) concurs with the finding and recommendation related to unlocated and stolen movable property.

Management has discussed the movable property issue with the District Vice Chancellors and reiterated the importance of implementing and maintaining adequate controls over the safeguarding of movable property. Staff of the Chancellor's Office have and will follow up with campus personnel to review and advise on their campus procedures related to movable property. Some of the property reported as unlocated in FY 2005 has been located. This will be reflected on future movable property certifications.

The person responsible for corrective action is Beth Sigler, Vice Chancellor of Finance and Administration. She can be reached at 225-219-8787.

Cordially,

Margaret Montgomery-Richard, Ph.D. Chancellor



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150 Third Street – Suite 200 Baton Rouge, LA 70801-1303 Telephone: (225) 219-0000 Fax: (225) 219-9497

April 21, 2006

(1)

Steve J. Theriot, CPA Legislative Auditor Office of the Legislative Auditor P.O. Box 94397 Baton Rouge, Louisiana 70804-9397

Re: LTC audit finding titled "Inadequate control over Pell grant"

Management of Louisiana Technical College agrees with the finding related to inadequate control over Pell grant funds.

The management of Louisiana Technical College recognizes its responsibility to manage Pell funds in accordance with the applicable federal guidelines. For this reason, actions were put into place last year to correct the above stated finding. These actions did result in improvements in this area. However, management of LTC will continue to invest time and effort into policy and procedure development and professional development for financial aid staff and fiscal office staff throughout the college.

To ensure that Pell grant funds are managed (obtained, disbursed and returned) according to federal guidelines, the following actions have been taken for immediate implementation:

- Each campus within Louisiana Technical College will work with the Office of the Chancellor to develop procedures for handling Title IV funds at the campus level.
 - a. In the procedure, communication between the Financial Aid Office and Accounting Office is required.
- (2) The Office of the Chancellor has a procedure in place to closely monitor and verify accuracy of information submitted for Title IV fund return processing.
 - a. The College Director of Student Financial Assistance will review each form received by the Office of the Chancellor for Title IV return processing.
 - b. For those forms that are not in compliance with federal regulations based on the information stated, the College Director of Student Financial Assistance will contact the campus Financial Aid Officers, campus Accountant, and/or campus Dean to get clarification and an explanation that will be placed with the return forms for processing by the Office of the Chancellor Accounting Department.
- (3) The Louisiana Technical College Office of Student Financial Assistance Policies and Procedures Manual, which is used as a training resource for campus financial aid officers and campus accountants (optional) has been updated to address this finding. See section 18- Disbursement of Funds attached.

Ms. Lisa Jackson, LTC Director of Student Financial Assistance, is responsible for ensuring compliance with the corrective actions listed above.

Sincerely,

Richard

Margaret Montgomery-Richard, Ph. D.

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18 Section Eighteen: Disbursement of Funds

18.1 Responsibility for Disbursement of Funds

The campus Accounting Office has the responsibility for disbursement of any type of check, whether it is a loan, grant, scholarship or refund check. Upon approval to participate in the FWSP, the campus Accounting Office, which houses payroll functions, will have the responsibility for disbursing FWSP paychecks.

18.2 Separation of Functions

There is a clear and distinct separation of functions between the campus OFA and the campus Accounting Office. The campus Office of Financial Aid assures and maintains the accurate and appropriate awarding of aid funds. This information is submitted to the campus Accounting Office. These funds credit the student's account. Any monies that exceed current charges are disbursed to the student by campus Accounting Office staff.

18.3 Procedures

The campus Office of Financial Aid staff manually posts award type(s) to on the student's award letter using EDExpress. Pell Title IV funds are originated and disbursed using EDExpress. Upon receipt of approved origination and disbursement records, students are manually awarded in PeopleSoft. Request for payments (RFPs) are completed and sent to the Office of the Chancellor – Director of Student Financial Assistance for review and Once the Office of the Chancellor - Director of processing. Student Financial Assistance reviews the RFPs, matches it with the PeopleSoft entries, and verifies that the available funds in the campuses' account will cover the request, information is sent to the Office of the Chancellor - Accounting Office for the checks to be produced and mailed with signature sheets to the campus accountants for distribution. The campus accountants must work with the financial aid office staff to verify that the checks received Campus Financial Aid Officers will work with are correct. instructors to verify enrollment status of students prior to checks being issued by accountants. Checks are not to be held by the campus accountants for more than 30 days from the date of the check for students to pick up. Campus accountants must work with campus financial aid staff and instructor's to locate students. Unclaimed Title IV Pell grant checks that students are eligible to

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receive must be mailed to the Office of the Chancellor with a letter indicating they should be categorized as unclaimed property. Unclaimed Title IV Pell grant checks that need to be voided must be returned on a completed Return to Title IV Funds form. For Title IV funds that have already been deposited by the campus, a journal voucher entry can be made. The Title IV Pell grant journal voucher entries must also be placed on a completed Return of Title IV Funds forms. These forms are to be mailed to the following address: Louisiana Technical College, Pell Grant Office, 150 Third Street, 2nd Floor, Baton Rouge, Louisiana 70801-1303. Upon receipt of Title IV returns, the Office of the Chancellor Accounting Office will return the funds to the US Department of Education within 30 days from the date of determination on the Return to Title IV form.

For those funds, not returned for processing in a timely fashion, the Office of the Chancellor will inquire and require an written explanation for auditing purposes.

18.3.1 Verification of Identity of Student

Students must present a valid identification to receive financial aid monies from the campus Accounting Office (i.e. driver's license). Each student must sign a roster indicating that they received the check.

18.3.2 Verification of Status

The student's eligibility status is checked by the Office of Financial Aid. Printed schedules from the 14th day of enrollment are placed in each student's folder to verify enrollment. If, for some reason the student's check has already been requested and the student's status changes and the student became ineligible, the campus Financial Aid Officer will manually correct the error in EDExpress and inform the Accounting Office to return the funds.

18.3.3 Student Endorsement

Students are required to endorse co-payable checks and Title IV Pell grant checks before funds can be released (i.e., outside scholarship or student loan checks). The student is the only person who may endorse the check. There are no substitutions and no exceptions to this policy. If a student is not available for a signature but the campus has a signed

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promissory note and the monies are owed to the student's outstanding balance, the campus accountant must mail the check to the Office of the Chancellor Accounting Department at 150 Third Street, 2nd Floor, Baton Rouge, Louisiana 70801-1303 with a letter stating that it needs to be deposited into the campus' account due to the student's unavailability to sign.

18.4 Pell Grant Procedures for Fiscal/Accounting Staff

18.4.1 Authorization

The Pell grant program is a federal program authorized by Title IV of the Higher Education Act of 1965 as amended. This program is administered by the U.S. Department of Education to provide financial assistance to eligible undergraduate students enrolled in eligible postsecondary programs of study. Institutions that participate in the Pell program have certain accounting responsibilities related to the receipt and disbursement of federal funds. The institution's accounting records must clearly show that funds were obtained, managed, disbursed, and returned according to federal regulations.

18.4.2 Policy Statement

The Louisiana Technical College will manage the funds received under Title IV according to federal regulations. The Louisiana Technical College will reconcile the Pell grant financial transactions monthly. This process will compare the Pell grant program general ledger transactions to the transactions posted in the Department of Education's Grant Administration and Payment System (GAPS). Any differences will be researched and the records updated with the appropriate corrections.

18.4.3 Reconciliation Procedures

The responsibility for reconciling the Pell grant transactions is with the Accounting Analyst. At the end of each month, the Accounting Analyst will review each campus' revenue and expense general ledger balances for each Pell grant. For those campuses that have excess revenues or expenses, the differences will be researched and the appropriate corrections posted to the accounting system within the month.

After the general ledger revenue and expense balances are equal for each campus, the Accounting Analyst will compare the revenue ledger

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balances to the net drawdown amounts as recorded in GAPS for each campus. Any differences will be researched and the appropriate corrections posted to the accounting system or GAPS within the month.

- 18.4.4 Specific Procedures
 - 18.4.4.1 Award Disbursement, Request and Receipt
 - 1. Each campus financial aid officer will establish the student information and award amount in the student administration module of PeopleSoft.
 - 2. The Restricted Funds Accountant will batch the student awards by campus and submit the file to the Accounts Payable department to produce the student checks.
 - 3. The Senior Accountant will process batched checks for Tuition and books made payable to the LTC campus. The residual checks will be made payable to each eligible student. The checks and a corresponding residual signature sheet will be mailed to the campus accountant for distribution to the students.
 - 4. The Restricted Funds Accountant will request the appropriate amount of Pell grant funds through GAPS. The accountant will establish a receivable in PeopleSoft for the amount of the funds awarded by each campus. The journal date for the receivable shall be within the same month as the journal for the checkwrite.
 - 5. As funds are received in the Pell bank account, the appropriate campus' receivable will be liquidated.
 - 6. The funds received will be moved from the Pell bank account into the general depository account.

18.4.4.2 Returns

A return is initiated when a return request form is received from a campus. Each campus has the responsibility to submit a return form and the funds to be returned for each student that owes funds to the Pell grant program within 30 days of the date of determination of withdrawal. The return can be a **student** return and/or a **campus** return.

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When a **student** return is received, the following items must be present on the form:

- 1. Campus name
- 2. Student's name
- 3. Award year
- 4. Date of determination of withdrawal
- 5. Amount to be returned
- 6. Check or money order

The procedure for processing the student return is as follows:

- The accountant deposits the student's funds in the Pell bank account. The deposit is coded to account 5825 for the appropriate Pell project/grant id and campus.
- **2.** The Restricted Funds accountant returns the funds in GAPS for the appropriate award year.
- **3.** The return form is forwarded to the accounts payable accountant who prepares an accounts payable EFT voucher to record the return of cash. The voucher should debit revenue for the appropriate Pell project/grant id and campus.

When a **campus** return is received, the following items must be present on the form:

- 1. Campus name
- 2. Student name
- 3. Award Year
- 4. Date of determination of withdrawal
- 5. Amount to be returned
- 6. Journal voucher number and copy of journal voucher

The journal voucher which is prepared by the campus accountant should debit tuition and fee revenue in fund 10 for the appropriate amount(s) and credit cash in fund 10 for the total amount to be returned.

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The procedure for processing the campus return is as follows:

- 1. The Restricted Funds Accountant returns the funds in GAPS for the appropriate award year.
- 2. The Restricted Funds Accountant records the return in PeopleSoft by preparing a journal voucher that reduces the Pell tuition expense and cash for the appropriate Pell project/grant id and campus.
- 3. The return form is forwarded to the accounts payable accountant who prepares an accounts payable EFT voucher to record the return of cash. The voucher should debit revenue for the appropriate Pell project/grant id and campus.

18.4.4.3 Voids

A void is initiated when a request to void form, along with the original check, is received from a campus. Each campus has the responsibility to submit a request to void form and the original check to be voided for each student that does not pick up his/her Pell check within 30 days of the date of the check.

When a check is returned to be voided, the following information must be present on the void form:

- 1. Campus name
- 2. Student name
- 3. Award Year

4. Reason for void

- 5. Amount of check
- 6. Check #
- 7. Original check

The procedure for processing the void is as follows:

1. The request to void form and check is forwarded to the Senior Accountant who processes the void in PeopleSoft.

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- **2.** The Senior Accountant sends a copy of the form and the check to the Restricted Funds Accountant who returns the funds in GAPS.
- **3.** The Restricted Funds Accountant forwards a copy of the form to the accounts payable accountant who is responsible for entering an EFT voucher in PeopleSoft to record the return of cash. The voucher should debit revenue for the appropriate Pell project/grant id and campus.

SAMPLE

STEPS TO ENSURE 30 DAY COMPLIANCE RETURN OF TITLE IV FUNDS

I. Day 1

- Campus receives the checks and signature sheets
- Students picks the checks and signs signature sheet

II. Day 10 (ten class days)

- If check is not picked up, contact the Financial Aid Officer
- Financial Aid Officer must contact each instructor to determine if a Title IV refund calculation needs to be done. Contacting the instructors may take as long as a week
- III. Day 15
 - Financial Aid Officer must inform the Accounting Department the status of the student and determine what needs to be done with the pending checks:
 - o Student is coming in a day or two to pick up the check
 - Void and return the check because a new one needs to be requested
 - Return check to the Office of the Chancellor with a statement/letter that indicates the student is eligible for the funds but can not be located and the funds need to be classified as unclaimed property

NOTE:

The **Date of Determination** = the day that the Financial Aid Officer discovers "what happened to the student" or "locates the student".

IV. Day 20

• Forward checks to LTC Central Office with the appropriate Return to Title IV form completed or letter stating unclaimed property.



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January 11, 2006

Steve J. Theriot, CPA Legislative Auditor 1600 North Third Street P.O. Box 94397 Baton Rouge, LA 70804-9397

Re: Inadequate Internal Control over TANF finding

Dear Mr. Theriot,

Management of Louisiana Technical College (LTC) concurs with the finding and recommendation related to inadequate internal control over TANF funding.

Management has issued a policy regarding the proper billing procedures for grants and contracts. This policy was reviewed and discussed with campus personnel in May, 2005 at the statewide convocation of the LTC. This policy requires that appropriate documentation be maintained on all grants receivables and also requires a monthly reconciliation of all outstanding grant receivables. In addition, management has requested from the staff of the Louisiana Community and Technical College System to be included on all directives regarding the TANF and STEP program. This communication will assist management of the LTC in disseminating accurate information to campus staff regarding the requirements of the TANF and STEP programs. Finally, staff of the Chancellor's Office will be following up with campus personnel for the campuses that were cited to review their corrective actions as well as communicating with other campuses regarding the TANF and STEP program requirements.

If you have any questions or need additional information, please contact Pam Diez, LTC Comptroller at 225-219-9496.

Cordially

Margaret Montgomery-Richard, Ph.D. Chancellor