

FINANCIAL AID
CALIFORNIA STATE UNIVERSITY,
CHICO

Report Number 02-32
March 24, 2003

Members, Committee on Audit

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CONTENTS

INTRODUCTION

Purpose.....	1
Scope and Methodology	2
Background.....	2
Opinion	5
Executive Summary	6

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

General/Control Environment.....	7
Consumer Information.....	7
Computer System Backups.....	8
Financial Aid Reporting	8
Fiscal and Program Coordination/Oversight.....	10
Student Eligibility	11

APPENDICES

APPENDIX A:	Personnel Contacted
APPENDIX B:	Campus Response
APPENDIX C:	Chancellor's Acceptance

ABBREVIATIONS

AA	Academic Affairs
CFR	Code of Federal Regulations
CO	Chancellor's Office
CSU	California State University
CSUC	California State University, Chico
EADA	Equity in Athletics Disclosure Act
EFC	Expected Family Contribution
FABS	Financial Aid Business System
FADB	Financial Aid Database
FAO	Financial Aid Office
FARMS	Financial Aid Records Management System
FERPA	Family Educational Rights and Privacy Act of 1974
FY	Fiscal Year
RA(s)	Resident Advisor(s)
SAM	State Administrative Manual
SCRMS	Special Circumstances Record Management System
SFA	Student Financial Aid
SIS+	Student Information System Plus
SUG	State University Grant
UHFS	University Housing and Food Services

INTRODUCTION

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of the student financial aid program and to determine the adequacy of controls over the related processes to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- ▶ Initiatives have recently been undertaken or completed to improve the effectiveness, efficiency, and economy of financial aid operations and maximize financial aid resources.
- ▶ Adequate consumer information on financial aid has been disclosed.
- ▶ Financial aid is supported by adequate automated record-keeping systems.
- ▶ Provisions have been made for safeguarding financial aid data and automated systems from inappropriate disclosure and loss.
- ▶ Complete, correct, and consistent information is circulated on financial aid.
- ▶ Other campus offices adequately coordinate with the financial aid office.
- ▶ The campus protects against overcommitment or underutilization of financial aid resources.
- ▶ Standard student budgets and cost of attendance are appropriately established.
- ▶ Financial aid recipients were eligible to receive assistance.
- ▶ The campus has complied with federal and state requirements and conditions stipulated by financial aid resource providers.
- ▶ Financial aid is packaged in accordance with applicable policies and procedures.
- ▶ Fee waivers have been factored into financial aid awards.
- ▶ Work-study limits have not been exceeded.
- ▶ Separation of duties is adequate between awarding and disbursing.

SCOPE AND METHODOLOGY

The management review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor policies, letters, and directives. Fiscal year (FY) 2001/02 and the financial aid cycles for fall 2001 and spring 2002 were the primary periods reviewed. In certain instances, we were concerned with representations of annualized data, and it was necessary to look at the last full fiscal year completed prior to the start of the audit (FY 2000/01).

Our primary focus involved the internal administrative, compliance, and operational controls over the management of the student financial aid program. Specifically, we reviewed and tested policies, procedures, and processes for:

- ▶ Identifying financial aid resources.
- ▶ Distributing information to potential applicants.
- ▶ Calculating student budgets.
- ▶ Establishing student eligibility.
- ▶ Packaging financial aid awards.
- ▶ Managing financial aid funds.
- ▶ Securing financial aid applicant and recipient information.
- ▶ Safeguarding financial aid automated systems.

During the audit, we interviewed personnel involved in financial aid; reviewed financial aid policies, procedures, and systems; and tested financial aid records on awards and disbursements.

BACKGROUND

As a result of a systemwide risk assessment conducted by the Office of the University Auditor in the last quarter of 1999, the Board of Trustees, at its January 2002 meeting, directed that *Financial Aid* be reviewed in 2002. The Office of the University Auditor last reviewed *Financial Aid* in 1994 on six campuses.

The proposed scope of the audit as presented in Attachment B, Audit Item 2 of the January 29-30, 2002, meeting of the Committee on Audit stated that the review would include identifying financial aid resources, establishing student budgets, packaging financial aid awards, managing financial aid funds, complying with federal and state program requirements, securing financial aid applicant information, and preparing financial aid reports.

Financial aid programs provide support for students to help meet the costs of obtaining a college education. The federal government, state governments, colleges and schools, and a variety of other public and private sources provide funding for financial aid programs. There are two main categories of financial aid, differentiated primarily by the basis upon which they are awarded, as follows:

Achievement-based aid is awarded to students who have a special characteristic, skill, talent, or ability. Typically, achievement-based aid is in the form of scholarships.

Need-based aid is provided to students who demonstrate financial need. Most financial aid, particularly public-funded aid, is awarded on the basis of financial need determined through the application process and in accordance with a prescribed federal formula.

Financial aid is available in four basic types of programs as follows:

Scholarships are “gift aid” which does not have to be repaid. Scholarships typically include criteria such as academic performance or special talents.

Grants are “gift aid” and generally do not include criteria other than financial need.

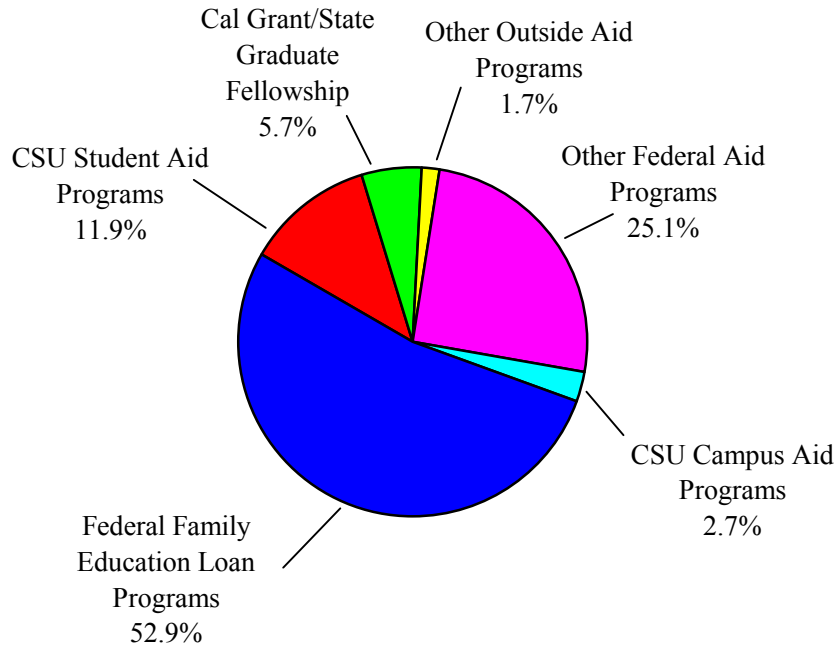
Work-study is a “self-help” program in the form of part-time employment during the student’s college career.

Loans are a form of “self-help” since they represent borrowed money that must be paid back over a period of time, typically after the student leaves school.

Federal financial aid programs provide over 70% of the funding currently available for student financial aid. On an annual basis, federal financial aid programs are audited as part of the California State University (CSU) Single Audit as required by the Office of Management and Budget Circular A-133. At June 30, 2001, the student financial assistance cluster in the Single Audit Report by KPMG included:

PROGRAM	AMOUNT
Federal Supplemental Opportunity Grants	\$12,636,585
Federal Family Educational Loan	\$325,886,005
Federal Work Study	\$16,358,009
Federal Perkins Loan – Federal Capital Contributions	\$17,060,565
Federal Pell Grant	\$246,059,734
Federal (William Ford) Direct Loan	\$280,164,585
TOTAL	\$898,165,483

Nonfederal financial aid programs include those funded by the state through the California Student Aid Commission, programs administered by the CSU, and campus-administered funds. The state administers Cal Grants and certain loan assumption programs. The CSU provides need-based assistance through state university grants and educational opportunity program grants. Certain other funds are available through the campuses such as local scholarships. In the CSU Statistical Abstract for FY 2000/01, financial aid funds by source are graphically represented as follows:



For financial aid purposes, campuses establish standard student budgets or cost of attendance allowances that vary depending on where a student lives during the academic year (e.g., at home with parents or relatives, in university or campus housing (residence halls), or off-campus in an apartment or other housing). Costs include fees and tuition, books and supplies, meals and housing, transportation, and other miscellaneous personal expenses. Students who are not classified as residents of the state of California must also pay nonresident tuition. Allowances for expenses, other than tuition and fees, are based largely on statewide survey data about the average expenses of students in California and information on the local or regional costs in the area served by particular campuses.

At the beginning of 2002, CSU campuses managed financial aid through a variety of record-keeping and automated database systems, which will be replaced by PeopleSoft as part of the CSU's Common Management System. Six CSU campuses are implementing the PeopleSoft Student Administration module in 2002 and have been excluded for purposes of this audit because of the significant implementation workload.

At California State University, Chico (CSUC), the financial aid office, which reports through the vice president for university advancement and student affairs, determines and authorizes need-based financial aid. Financial aid is then disbursed by financial aid business services, which reports through the vice president for business and finance. CSUC maintains financial aid records in a locally developed database called FARMS (Financial Aid Records Management System) that was recently augmented by SCRMS (Special Circumstances Record Management System). Disbursements are made through the Financial

Aid Business System (FABS). Related student information is maintained in the Student Information System Plus (SIS+). The director of financial aid reports to an associate vice president for university advancement and student affairs.

OPINION

We visited the CSUC campus from October 28, 2002, through December 13, 2002, and audited the controls, procedures, and systems in effect at that time.

In our opinion, the financial aid program at CSUC was capably administered and generally in compliance with applicable regulations. However, our review disclosed certain areas of the program that needed improvement. Specifically, we noted that consumer information was not disclosed in direct notices, program reports on financial aid were not reconciled to accounting records of amounts disbursed, and housing information is not properly coordinated with the financial aid office.

EXECUTIVE SUMMARY

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

GENERAL/CONTROL ENVIRONMENT [7]

CONSUMER INFORMATION [7]

Certain consumer information was not disclosed in direct individual notices. Disclosure of consumer information meets requirements for continuation of institutional eligibility to participate in federal financial aid programs.

COMPUTER SYSTEM BACKUPS [8]

Weekly backup tapes were taken off-site and stored at a personal residence. Appropriate storage of off-site backup data reduces the risk of data loss, disclosure of confidential information, and disruption of operations should a disaster occur.

FINANCIAL AID REPORTING [8]

Financial aid reported to the chancellor's office (CO) in the 2001-2002 Financial Aid Database Report was understated by \$4.5 million. Accurate reporting facilitates systemwide comparisons and proper allocations and program evaluations based on total financial aid administered.

FISCAL AND PROGRAM COORDINATION/OVERSIGHT [10]

Confirmation of student living arrangements had not been coordinated with university housing and food services. Coordination with housing reduces the risk that errors and irregularities will go undetected and increases the likelihood of an equitable distribution of financial aid based on financial need.

STUDENT ELIGIBILITY [11]

Many of the students who were resident advisors (RAs) living in on-campus housing and receiving financial aid received benefits that exceeded their out-of-pocket costs. Matching of financial aid benefits with current attendance costs reduces the risk of financial aid overpayments and provides a more equitable distribution of funds.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL/CONTROL ENVIRONMENT

CONSUMER INFORMATION

Certain consumer information was not disclosed in direct individual notices.

The campus relied upon the availability of consumer information in the campus catalog and at various website addresses for disclosure purposes. A major exception was the annual mass mailing of crime/security statistics to current students and employees.

The federal Higher Education Act, the federal Equity in Athletics Disclosure Act (EADA) and regulatory guidance provided in the Code of Federal Regulations (CFR) requires direct individual notices of prescribed information to certain target audiences including: prospective students; currently enrolled students; current employees; parents, coaches and counselors of prospective student athletes; and the general public. The disclosures are to include general school information, crime/security statistics, student completion/graduation/transfer rates, Family Educational Rights and Privacy Act (FERPA) privacy/security rights, financial aid program information, and gender-specific information on athletic participation and financial support.

At a minimum, direct individual notices must:

- ▶ Identify the required information disclosures.
- ▶ Provide the exact electronic website address where the information can be found.
- ▶ State that upon request, a person is entitled to a paper copy containing the required information.
- ▶ Inform students and others how to request a paper copy.

Regulatory guidance repeatedly states that web presentation by itself is not an acceptable disclosure.

The director of financial aid indicated that notification to various constituencies on a direct individual basis was dispersed among various other campus offices.

The lack of individual direct notice of prescribed financial aid information jeopardizes the institutional eligibility of the campus to participate in federal financial aid programs.

Recommendation 1

We recommend that the campus establish procedures to disclose consumer information by direct individual notice.

Campus Response

CSU, Chico concurs with the audit recommendation. Relevant campus personnel have been apprised of the need to provide direct consumer disclosure information. Further discussion and action are

necessary. We anticipate having updated documents that provide the required information to all continuing and prospective students by August 2003.

COMPUTER SYSTEM BACKUPS

Weekly backup tapes were taken off-site and stored at a personal residence.

The financial aid office used a vendor software package to backup files and systems. While daily backup tapes were taken from the financial aid office and stored in another campus building, weekly backup tapes were taken to a personal residence.

State Administrative Manual (SAM) §4841 requires state agencies to provide for the proper use and protection of its information assets by establishing appropriate policies and procedures for preserving the integrity and security of automated files and databases.

The director of financial aid stated that personal retention of backup tapes was an interim solution while the computer center was implementing some changes.

Inappropriate storage of off-site backup data increases the risk of data loss, disclosure of confidential information, and disruption of operations should a disaster occur.

Recommendation 2

We recommend that the campus store weekly financial aid backup tapes in the same secured off-site location used by the campus data center.

Campus Response

CSU, Chico concurs with the audit recommendation. The campus computer center is negotiating a contract with an off-site vendor for storage of back-up tapes. The financial aid office will be included in the contract. We anticipate having the contract signed and implemented by July 2003.

FINANCIAL AID REPORTING

Financial aid reported to the chancellor's office (CO) in the 2001-2002 Financial Aid Database Report was understated by \$4.5 million.

The campus generated the Financial Aid Database Report from the Financial Aid Records Management System (FARMS). However, a comparison of this report to the Financial Aid Business System (FABS) for 2001-2002 disclosed that the campus had disbursed \$4.5 million more financial aid than reported. The following differences were noted:

	Reported to the CO	Disbursed per FABS	Difference
Cal Grants	\$2,627,910	\$2,633,409	-\$5,499
Pell Grant	14,066,554	14,075,577	-9,023
State University Grant	5,827,923	5,832,335	-4,412
Perkins Loan	1,108,434	1,110,402	-1,968
Subsidized Stafford Loan	24,561,597	24,128,247	+433,350
Unsubsidized Stafford Loan	5,309,161	10,219,334	-4,910,173
Plus Loan	1,735,509	1,736,210	-701
TOTAL			-\$4,498,426

Academic Affairs (AA) coded memorandum AA 2002-41 requested campuses to submit the final 2001-2002 Financial Aid Database Report by September 16, 2002, with the full range of data required.

SAM §20050 indicates that the elements of a satisfactory system of internal accounting and administrative controls include an effective system of internal review. Further, internal accounting controls comprise the methods and procedures directly associated with assuring the reliability of accounting data.

The director of financial aid indicated that there were several reasons for the differences, although the major contributing factor was the under reporting of \$4.9 million in unsubsidized Stafford Loans due to a flaw in the FARMS program that omitted these loans for students if no other type of financial aid was received.

Inaccurate reporting undermines the validity of statistics accumulated systemwide and may affect campus allocations and program evaluations based on total financial aid administered.

Recommendation 3

We recommend that the campus establish procedures to reconcile FABS accounting records with FARMS-generated reports of financial aid activity at least annually before program reports are generated and verify that the results are consistent with information reported to the CO.

Campus Response

CSU, Chico concurs with the audit recommendation. Though procedures have been in place for monthly reconciliation of disbursement information between FABS and FAO, the Financial Aid Database (FADB) report to the CO was not checked for accuracy. As a result, \$4.5 million of unsubsidized loans were not reported. A triangular report has been created to compare disbursement amounts between FABS, FAO, and the FADB report. This triangular report will be run and evaluated before submission of data to the CO. We anticipate this process being implemented for the next annual FADB report, due in September 2003.

FISCAL AND PROGRAM COORDINATION/OVERSIGHT

Confirmation of student living arrangements had not been coordinated with university housing and food services.

We found that:

- ▶ The financial aid office did not confirm on-campus student living arrangements with university housing and food services (UHFS).
- ▶ Two of nine students reviewed, who were budgeted as living on-campus, did not live in the residence halls. One of these students had applied but then cancelled without penalty. The other student was not known to UHFS.
- ▶ The campus had established the same financial aid budgets for living on-campus and off-campus. However, budgets for students living at home with their parents were significantly lower.

Chapter 2 of the U.S. Department of Education's *Accounting, Recordkeeping, and Reporting by Postsecondary Educational Institutions for Federally Funded Student Financial Aid Programs* (Blue Book), June 2001, *General Institutional Responsibilities*, states that the institution has the responsibility to maintain accurate information about student applicants for Title IV aid and to resolve any discrepancies or inconsistencies.

The director of financial aid indicated that confirmation of living arrangements with the housing office was less important at this campus because the student financial aid budgets were the same for living on-campus and off-campus.

The risk of errors and irregularities increases when on-campus housing occupancies are not coordinated with the financial aid office, which may result in excess financial aid awards to some students, limiting the availability of award monies to other students with financial need.

Recommendation 4

We recommend that the campus coordinate information on student living arrangements between the financial aid office and UHFS to ensure that financial aid recipients budgeted as living on-campus actually establish occupancy in the residence halls.

Campus Response

CSU, Chico concurs with the audit recommendation. The financial aid office has identified all 2002/03 financial aid applicants who may have discrepant housing codes. We are in the process of making coding changes to those files to as accurately as possible reflect whether they are living off-campus, in on-campus residence halls, or with parents. CSU, Chico's policies and procedures manual has been updated to reflect the need to accurately adjust for living arrangements each year. (Timeline: July 2003)

STUDENT ELIGIBILITY

Many of the students who were resident advisors (RAs) living in on-campus housing and receiving financial aid received benefits that exceeded their out-of-pocket costs.

In 2001-2002, UHFS had 56 RAs living in on-campus housing for one or both semesters. Thirty of these fifty-six RAs also received financial aid benefits including 17 who received Pell Grants and 14 who received State University Grants.

All RAs received room and board. After one semester of service, UHFS also paid the fees for returning RAs. In 2001-2002, UHFS fee payments were \$1,035 per semester for each RA as follows:

State University Fee	\$714
Student Union Fee	105
Student Activity Fee	40
Instructionally Related Activities Fee	74
Health Services Fee	97
Health Facilities Fee	3
ID Card	2
TOTAL	\$1,035

Financial aid benefits were calculated based on a standard cost of attendance formula that included the following amounts for undergraduates living on-campus in 2001-2002:

Fees and Tuition	\$2,070
Books and Supplies	846
Room and Board	7,500
Transportation	584
Miscellaneous and Personal	1,400
TOTAL	\$12,400

RAs who had their room and board and fees paid by UHFS did not have to pay these out-of-pocket costs, yet they received financial aid benefits as if they did. Only the fee payments were captured in FARMS as other scholarships and grants.

Volume 1, Chapter 7 of the U.S. Department of Education's 2001/02 Student Financial Aid (SFA) Handbook, *Financial Need and Packaging*, states that "the total aid the student may receive from the SFA programs and other sources (when added to the student's EFC) cannot exceed the student's cost." It also indicates that the value of room and board provided to an employee should be reported as untaxed income.

The CSU State University Grant (SUG) program policy guidelines indicate that a student has to have paid the State University Fee in order to be eligible for a SUG.

The director of financial aid stated that there were options for handling RA transactions based on multiple variables such as whether the student is technically charged for the room and board and

whether the value of room and board is considered a reportable payment for income tax purposes. She further stated that the general consensus seemed to be that the federal guidelines were confusing.

Calculating financial aid benefits without considering UHFS payments overestimates RA financial aid needs.

Recommendation 5

We recommend that the campus reduce financial aid benefits for RAs to recognize payments by UHFS.

Campus Response

CSU, Chico concurs with the audit recommendation. Financial aid office staff has discussed this audit recommendation with university housing and food service staff and the two offices are working together to appropriately account for RA benefits. The trustees' audit staff has recommended we consult with CO personnel to determine the best approach for implementing this recommendation, as little federal guidance is available. We anticipate contacting appropriate CO staff and having appropriate procedures in place for the 2003/04-award year. (Timeline: September 2003)

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Manuel A. Esteban	President
Anita Barker	Athletic Director
Mark Carlsten	Programmer/Analyst, Financial Aid
Kelly Clark	Lieutenant, Public Safety
Jim Cragle	Programmer/Analyst, Financial Aid
Kentiner David	Assistant Director, Financial Aid
Adam Fernandez	Financial Operations Analyst, University Housing and Food Services
Dennis Graham	Vice President for Business and Finance
Darlene Gross	Associate Director for Financial Operations and Personnel Management, University Housing and Food Services
Jean Irving	Compliance Coordinator, Student Records and Registration
Steve Irving	Coordinator, Student Employment Office
Pam Johnstone-Lindemann	Assistant Registrar
Bill Jones	University Internal Auditor/Financial Analyst
Barbara Joronen	Account Analyst, Risk Management and Business Services
Chris Malone	Associate Director, Educational Opportunity Program/Educational Support Programs
Debbie McElroberts	Director, Computing Services
Jim Moon	Associate Vice President for University Advancement and Student Affairs
Paul Moore	Vice President for University Advancement and Student Affairs
Terryl Murphy	Scholarship Coordinator, Financial Aid
Linda Nelson	Program Specialist, Financial Aid
Stephanie Neuhart	Payroll Technician
Rez O'Sullivan	Program Leader, Financial Aid
Dan Reed	Associate Director, Financial Aid
Bruce Rowen	Registrar
John Swiney	Director, Admissions
Annette Tickner-Edwards	Director, Financial Aid
George Wellman	Associate Vice President, Financial Services
Chuck Worth	Director, Institutional Research
Stephanie Yule	Director, Risk Management and Business Services

California State University, Chico

Chico, California 95929-0025

Vice President for Business and Finance

Office: 530-898-6231 Fax: 530-898-4513

E-mail: dcgraham@csuchico.edu



May 5, 2003

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore
Long Beach, CA 90802-4210



Subject: Campus Responses to Trustees' Audit Report Number 02-32, Financial Aid, California State University, Chico

Enclosed is a copy of California State University, Chico's response to each of the five recommendations contained in the Financial Aid Audit Report Number 02-32, dated March 24, 2003. We have addressed each item with a proposed timeline.



Recommendation #1

We recommend that the campus establish procedures to disclose consumer information by direct individual notice.

Campus Response: (Timeline: August 2003)

CSU, Chico concurs with the audit recommendation. Relevant campus personnel have been apprised of the need to provide direct consumer disclosure information. Further discussion and action are necessary. We anticipate having updated documents that provide the required information to all continuing and prospective students by August 2003.

Recommendation #2

We recommend that the campus store weekly financial aid backup tapes in the same secured off-site location used by the campus data center.

Campus Response: (Timeline: July 2003)

CSU, Chico concurs with the audit recommendation. The campus computer center is negotiating a contract with an off-site vendor for storage of back-up tapes. The Financial Aid Office will be included in the contract. We anticipate having the contract signed and implemented by July 2003.

Recommendation #3

We recommend that the campus establish procedures to reconcile FABS accounting records with FARMS-generated reports of financial aid activity at least annually before program reports are generated and verify that the results are consistent with information reported to the CO.

Campus Response: (Timeline: September 2003)

CSU, Chico concurs with the audit recommendation. Though procedures have been in place for monthly reconciliation of disbursement information between FABS and FAO, the Financial Aid Database (FADB) report to the CO was not checked for accuracy. As a result, \$4.5 million of unsubsidized loans were not reported. A

Mr. Larry Mandel
May 5, 2003
Page 2

triangular report has been created to compare disbursement amounts between FABS, FAO, and the FADB report. This triangular report will be run and evaluated before submission of data to the CO. We anticipate this process being implemented for the next annual FADB report, due in September 2003.

Recommendation #4

We recommend that the campus coordinate information on student living arrangements between the financial aid office and UHFS to ensure that financial aid recipients budgeted as living on-campus actually establish occupancy in the residence halls.

Campus Response: (Timeline: July 2003)

CSU, Chico concurs with the audit recommendation. The Financial Aid Office has identified all 2002/03 financial aid applicants who may have discrepant housing codes. We are in the process of making coding changes to those files to as accurately as possible reflect whether they are living off-campus, in on-campus residence halls, or with parents. CSU, Chico's policies and procedures manual has been updated to reflect the need to accurately adjust for living arrangements each year.

Recommendation #5

We recommend that the campus reduce financial aid benefits for RAs to recognize payments by UHFS.

Campus Response: (Timeline: September 2003)

CSU, Chico concurs with the audit recommendation. Financial Aid Office staff has discussed this audit recommendation with University Housing and Food Service Staff and the two offices are working together to appropriately account for RA benefits. The trustees' audit staff has recommended we consult with Chancellor's Office personnel to determine the best approach for implementing this recommendation, as little federal guidance is available. We anticipate contacting appropriate CO staff and having appropriate procedures in place for the 2003/04-award year.

If you have any questions, please give our office a call.

Sincerely,



Dennis C. Graham

Vice President for Business and Finance

cc: Manuel A. Esteban
Bill Jones
George Wellman
Stephanie Yule
Paul Moore
Annette Edwards

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR



BAKERSFIELD

May 15, 2003

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

FRESNO

TO: Mr. Larry Mandel
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 02-32 on *Financial Aid*,
California State University, Chico

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of May 15, 2003, I accept the response as submitted with the draft final report on *Financial Aid*, California State University, Chico.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/ac

SACRAMENTO

Enclosure

SAN BERNARDINO

SAN DIEGO

cc: Dr. Manuel A. Esteban, President
Mr. Dennis C. Graham, Vice President for Business and Finance

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS