

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

**(A GOVERNMENTAL FUND OF THE
REPUBLIC OF THE MARSHALL ISLANDS)**

**INDEPENDENT AUDITORS' REPORTS ON
INTERNAL CONTROL AND ON COMPLIANCE**

YEAR ENDED SEPTEMBER 30, 2010

INDEPENDENT AUDITORS' 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

Chairman
Marshall Islands Scholarship Grant and Loan Board:

We have audited the financial statements of the Marshall Islands Scholarship Grant and Loan Board (MISGLB), a governmental fund of the Republic of the Marshall Islands (RepMar), as of and for the year ended September 30, 2010, and have issued our report thereon dated September 1, 2011. Our report includes an explanatory paragraph that the financial statements of MISGLB are not intended to present the financial position and results of operations of RepMar. 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

In planning and performing our audit, we considered MISGLB's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of MISGLB's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of MISGLB'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 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.

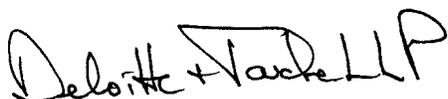
Compliance and Other Matters

As part of obtaining reasonable assurance about whether MISGLB'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 instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying Schedule of Findings and Questioned Costs (pages 7 through 10) as item 2010-1.

We noted certain matters that we reported to management of MISGLB in a separate letter dated September 1, 2011.

MISGLB's response to the findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs. We did not audit MISGLB's response and, accordingly, we express no opinion on it.

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

A handwritten signature in black ink that reads "Deloitte + Touche LLP". The signature is written in a cursive, stylized font.

September 1, 2011

**INDEPENDENT AUDITORS' 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 ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**

Chairman
Marshall Islands Scholarship Grant and Loan Board:

Compliance

We have audited the Marshall Islands Scholarship Grant and Loan Board's (MISGLB) compliance with the types of compliance requirements described in the *U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement* that could have a direct and material effect on MISGLB's major federal program for the year ended September 30, 2010. MISGLB's major federal program is identified in the summary of auditor's results section of the accompanying Schedule of Findings and Questioned Costs (pages 7 through 10). Compliance with the requirements of laws, regulations, contracts, and grants applicable to its major federal program is the responsibility of MISGLB's management. Our responsibility is to express an opinion on MISGLB'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 MISGLB'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 on MISGLB's compliance with those requirements.

As described in item 2010-2 in the accompanying Schedule of Findings and Questioned Costs, MISGLB did not comply with requirements regarding reporting that are applicable to its Compact of Free Association Sector Grants (CFDA # 15.875) major program. Compliance with such requirements is necessary, in our opinion, for MISGLB to comply with the requirements applicable to that program.

In our opinion, except for the noncompliance described in the preceding paragraph, MISGLB complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on its Compact of Free Association Sector Grants (CFDA # 15.875) major federal program for the year ended September 30, 2010.

Internal Control Over Compliance

Management of MISGLB 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 MISGLB'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 MISGLB's internal control over compliance.

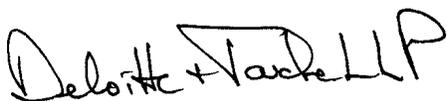
Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses and therefore, there can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses.

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. We consider the deficiencies in internal control over compliance described in the accompanying Schedule of Findings and Questioned Costs as item 2010-2 to be a material weakness.

Schedule of Expenditures of Federal Awards

We have audited the basic financial statements of MISGLB as of and for the year ended September 30, 2010, and have issued our report thereon dated September 1, 2011. Our audit was performed for the purpose of forming an opinion on the basic financial statements taken as a whole. The accompanying Schedule of Expenditures of Federal Awards (page 5) is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the basic financial statements. This schedule is the responsibility of the management of MISGLB. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated, in all material respects, in relation to the basic financial statements taken as a whole.

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



September 1, 2011

**MARSHALL ISLANDS SCHOLARSHIP
GRANTS AND LOAN BOARD**

Schedule of Expenditures of Federal Awards
Year Ended September 30, 2010

	Fund Balance Beginning of Year	Federal Funds Received	Other Funds Received	Funds Expended	Fund Balance End of Year
Funds passed through the Republic of the Marshall Islands:					
<u>U.S. Department of the Interior</u>					
<u>CFDA #15.875</u>					
Compact of Free Association, As Amended, Sector Grants:					
Section 211(a)(1) Education Sector	\$ -	\$ 471,924	\$ 5,429	\$ 6,439	\$ 470,914
Supplemental Education Grant	147,941	1,389,835	-	1,266,484	271,292
Section 211(b)(1) Kwajalein Special Needs	<u>88,488</u>	<u>100,000</u>	<u>-</u>	<u>-</u>	<u>188,488</u>
	<u>\$ 236,429</u>	<u>\$ 1,961,759</u>	<u>\$ 5,429</u>	<u>\$ 1,272,923</u>	<u>\$ 930,694</u>

See accompanying notes to schedule of expenditures of federal awards.

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

Notes to Schedule of Expenditures of Federal Awards
September 30, 2010

(1) Organization and Compact of Free Association

The Marshall Islands Scholarship Grant and Loan Board (MISGLB) is a subrecipient of funds received through Sections 211(a) and 211(b) and the Supplemental Education Grant of the Compact of Free Association, As Amended (the Compact), from the Republic of the Marshall Islands (RepMar). These funds are provided to support the post-secondary education of citizens of the Marshall Islands attending accredited post-secondary institutions.

(2) Summary of Significant Accounting Policies

Basis of Presentation

The accompanying Schedule of Expenditures of Federal Awards includes the federal grant activity of MISGLB and is presented on the modified accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements.

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

Schedule of Findings and Questioned Costs
Year Ended September 30, 2010

A. SUMMARY OF AUDITORS' RESULTS SECTION

Financial Statements

- | | |
|--------------------------------------------------------------|---------------|
| 1. Type of auditors' report issued: | Unqualified |
| Internal control over financial reporting: | |
| 2. Material weakness(es) identified? | No |
| 3. Significant deficiency(ies) identified? | None reported |
| 4. Noncompliance material to the financial statements noted? | Yes |

Federal Awards

Internal control over major programs:

- | | |
|---------------------------------------------------------------------------------------------------------------------------|---------------|
| 5. Material weakness(es) identified? | Yes |
| 6. Significant deficiency(ies) identified? | None reported |
| 7. Type of auditors' report issued on compliance for major programs | Qualified |
| 8. Any audit findings disclosed that are required to be reported in accordance with section 510(a) of OMB Circular A-133? | Yes |
| 9. Identification of major programs: | |

<u>CFDA Numbers</u>	<u>Name of Federal Program or Cluster</u>
---------------------	-------------------------------------------

15.875	Compact of Free Association, as amended, Education Sector
--------	--------------------------------------------------------------

- | | |
|------------------------------------------------------------------------------|-----------|
| 10. Dollar threshold used to distinguish between Type A and Type B programs: | \$300,000 |
| 11. Auditee qualified as a low-risk auditee? | No |

B. FINANCIAL STATEMENTS FINDINGS SECTION

<u>Reference Number</u>	<u>Findings</u>	<u>Refer Page #</u>
2010-1	Local Noncompliance	8

C. FEDERAL AWARD FINDINGS AND QUESTIONED COSTS SECTION

<u>Reference Number</u>	<u>Findings</u>	<u>Questioned Costs</u>	<u>Refer Page #</u>
2010-2	Reporting	\$ -	9

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

Schedule of Findings and Questioned Costs, Continued
Year Ended September 30, 2010

Local Noncompliance

Finding No. 2010-1

Criteria: Section 6(e) of the Scholarship Assistance of 1979 (the Act), as amended, requires MISGLB to ensure timely repayment of scholarship assistance loans. MISGLB policies and procedures require the repayment of student loans within one year of completion or cessation of studies. Furthermore, Section 7(h) of the Act authorizes MISGLB to convert scholarship assistance loans to grants.

Condition: During the year ended September 30, 2010, MISGLB was able to collect loan repayments from one scholarship recipient who completed their studies but chose not to work in the Marshall Islands. No other loan repayments were received from students, including students who withdrew from school.

Cause: The cause of the above condition is lack of enforcement of MISGLB policies and procedures requiring the repayment of scholarship assistance loans and the lack of a reconciled subsidiary loan ledger.

Effect: The effect of the above condition is the lack of loan repayments and a possibility that converted loans may not be completed.

Recommendation: We recommend that MISGLB enforce established policies and procedures requiring the repayment of scholarship assistance loans. Furthermore, we recommend that MISGLB reconstruct the subsidiary loan ledger to reconcile and agree with the general ledger in order that converted loans are complete and accurate.

Prior Year Status: The lack of loan repayments and the possibility that converted loans may not be completed was reported as a finding in the Single Audits of MISGLB for fiscal years 1997 through 2009.

Auditee Response and Corrective Action Plan: MISGLB response to the finding is as follows:

1. MISGLB, through the office staff, has continued to communicate and send out collection letters to former recipients with outstanding loans. As a result, MISGLB was able to collect \$11,647 on loan repayments during FY 2011;
2. Attempts to hire an outside collection agency, namely the Collection Service of Oregon, to assist with loan collection were made in FY 2010. However, the Attorney General's Office provided a negative legal opinion stating that such contract was in non-compliance with RMI regulations and required that MISGLB obtain 3 bidders;
3. The initiatives were taken in FY 2010 to hire a permanent Loan Collection Officer to work on student loan collection and loan repayment; however, the FY 2011 budget request for the creation of the new post was denied and therefore no funding was available;
4. MISGLB continues to find ways to better the loan collection efforts in FY 2011, such as, a revised collection list has been submitted to the Assistant Secretary of Revenue and Taxation, Ministry of Finance, for his submission to U.S. IRS for locating and providing contact information for these former scholarship recipients who have remained aboard;

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

Schedule of Findings and Questioned Costs, Continued
Year Ended September 30, 2010

Local Noncompliance, Continued

Finding No. 2010-1

Auditee Response and Corrective Action Plan, Continued:

5. MISGLB now requires all new loans to have loan guarantor who resides in the RMI. The loan guarantor will be responsible for full repayment of the student's loan if the recipient fails to comply with the Board's requirements.

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

Schedule of Findings and Questioned Costs, Continued
Year Ended September 30, 2010

Finding No. : 2010-2
Federal Agency : U.S. Department of the Interior
CFDA Program : 15.875 Economic, Social and Political Development of the Territories,
Compact Sector Grants.
Area : Reporting
Questioned Costs : \$0

Criteria: Section 8 of the U.S. Compact Funding Subaward Agreement requires MISGLB to provide quarterly and final SF269 (Financial Status Reports) and SF272 (Federal Cash Transaction Report) within 15 days after the end of the quarter to the Secretary of Finance.

Condition: At the year-end September 30, 2010, SF269 and SF272 reports were not submitted to the Secretary of Finance as required.

Cause: The cause of the above condition is lack of enforcement of MISGLB policies and procedures requiring reports to be submitted within the required time frame.

Effect: The effect of the above condition leads to potential noncompliance with the criteria.

Recommendation: We recommend that MISGLB timely submit required reports.

Auditee Response and Corrective Action Plan: MISGLB has been without a Fiscal Officer for such a long time and therefore could not provide its required financial reports on a timely manner. The Fiscal Officer post was vacant from February 2009 to May of 2009 and again from February 2010 to May 2010. Unfortunately, Patrick Langrine who took over the post in 2010 has again accepted a higher paying post at the Ministry of Finance in May 2011 leaving the Fiscal Officer post currently vacant. MISGLB continues to work with the Public Service Commission and the private sector in trying to recruit a suitable person with a bachelor degree in Accounting or Business to fill the post.

**MARSHALL ISLANDS SCHOLARSHIP
GRANT AND LOAN BOARD**

Unresolved Prior Year Findings and Questioned Costs
Year Ended September 30, 2010

The status of unresolved prior year findings is discussed within the Schedule of Findings and Questioned Costs section of this report (pages 7 through 10).