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Funds Flow and Financial Control Analysis of the Student Financial Assistance Programs (StuFAP)

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Philippine Institute for Development Studies
Surian sa mga Pag-aaral Pangkaunlaran ng Pilipinas

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Victoria Catibog

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Funds Flow and Financial Control Analysis of the Student Financial Assistance Programs (StuFAP)

Abstract

This study presents the scholarship, grant-in-aid and student loans (SGIAL) funds flow and its financial flow analysis and assesses the weaknesses and strengths of the SGIAL financial process. Some findings from the study show that the Department of Science and Technology (DOST) and the Commission on Higher Education (CHED) accounts and reports on SGIAL funds received from the General Appropriations Act (GAA) following standard government accounting rules and regulations deters scrupulous persons from misuse and misappropriation of the funds. However, administering scholarship funds have certain nuances that do not fit well with national procedures in the release of funds. For one, the fiscal year and the academic year do not jibe. DOST and CHED have to carefully consider this in their planning for the use of budgeted SGIAL funds from the GAA. The study recommends that there should be a creation of a scholarship trust fund to which releases from the GAA will be transferred. This will solve the problems caused by a non-synchronized fiscal and academic year. It will also insure the availability of actual cash to pay entitlements of scholars on time. This also enables the agency implementing the scholarship program to have a better basis for planning and budgeting the funds allocated for the purpose that is released to it.

Keywords: General Appropriations Act, Scholarships, Grants-In-Aid, Student loans, Commission on Higher Education (CHED), Student Financial Assistance Programs (StuFAP), Department of Science and Technology (DOST), Priority Development Assistance Fund (PDAF), Department of Budget and Management (DBM), Technical Education and Skills Development Authority (TESDA)

JEL: I230, I280

Funds Flow and Financial Control Analysis of the Student Financial Assistance Programs (StuFAP)

Victoria Catibog¹

I. Introduction

All government or public funds are managed subject to standard government accounting and auditing rules and regulations. In addition, specialized processes and procedures may be developed to enhance transparency and accountability suitable to the program or project for which the fund has been provided. In the development of specialized financial systems for the management of public funds, foremost concern is the rendering of reports to the people showing how the funds were utilized, who benefitted from the funds disbursed and who are accountable for the use of the funds.

Scholarship, grant-in-aid and student loans (SGIAL) are from public funds and must therefore be subject to appropriate measures that will insure that the funds are properly utilized and accounted for. Internal control mechanisms within the financial management system of the SGIAL must be put in place. Sound policies must guide the establishment of the financial management system that must be able to curtail to the extent possible every conceivable loophole to safeguard SGIAL funds from misappropriation and irregular transactions. As such, care and focus must be observed in adopting policies, processes and procedures in the management of SGIAL funds.

The Commission on Higher Education (CHED) and the Philippine Institute for Development Studies (PIDS) had entered into an agreement to jointly take the lead in the implementation of the project on “Grants-in-Aid for Research, Development and Extension (RDE) for State Universities and Colleges (SUCs).” The project aims to address the need to upgrade the institutional capability of SUCs and to provide quality higher education for generating/adapting/transferring technologies in order to enhance productivity, alleviate poverty, and further improve the country’s competitiveness. For this component of the project, *the study will present the SGIAL funds flow and its financial flow analysis and assesses the weaknesses and strengths of the SGIAL financial process.*

II. Description of Funds Flow and Financial Control System

From the National Government to Agencies

Following the established procedure for the release of funds appropriated for agencies in the national budget, scholarship, grant-in-aid and student loan funds included in the General Appropriations Act (GAA) are released by the Department of Budget and Management (DBM) to the authorized implementing agency. Allotments in general are released through approval of the

¹ Ms. Victoria Catibog is a PIDS consultant under the PIDS-CHED project entitled “Grants-in-Aid for Research, Development and Extension (RDE) for State Universities and Colleges (SUCs).”

Agency Budget Matrix (ABM). If there are withheld or additional or supplemental allotments relative to the ABM, these are released through Special Allotment Release Orders (SARO). The receipt of the fund release document signals authority for implementing agencies to enter into contracts and start committing funds for goods and services and other needs. In the case of scholarship, grant-in-aid and student loans (SGIAL), this implies that agencies authorized to administer these programs may now commence giving out awards and grants to qualified applicants technically referred to as “obligation of funds”.

Simultaneously with the approval of the ABM is the approval by DBM of the agency’s monthly cash program (MCP). Actual payments will depend on the availability of cash covering the allotments released. DBM releases cash to agencies through a Notice of Cash Allocation (NCA) which authorizes the Bureau of the Treasury (BTr) to transfer cash to the bank account of the implementing agency. Agencies withdraw cash from this account to settle their obligations. For agencies implementing SGIAL funded by the GAA actual cash payment for tuition, stipends and other entitlements of the scholarship programs may now be released.

Two of the agencies that are major implementers of SGIAL programs in the tertiary level among others are the CHED and the Department of Science and Technology (DOST). These two agencies manage sizeable amounts of SGIAL funds coming from the GAA as part of their approved budgets. Hence, they receive releases for SGIAL following the process of release described above. For the current year, CY 2012, CHED has Php500M and DOST has about Php1.2B tertiary level scholarship funds included in the GAA.

Meanwhile, a third sizeable source of funds for SGIAL is the Priority Development Assistance Fund (PDAF) of congressmen and senators. This fund is administered by the DBM and releases are made for SGIAL upon the instructions of a congressman or a senator out of his or her allocation of the PDAF. Just like the funds included in the budget of CHED and DOST, the release of PDAF fund follow the same process. DBM releases this to any of the implementing agencies identified in the “Project Menu and List of Requirements” that govern the use of the PDAF. In the menu, the implementing agencies identified for scholarships are the Department of Education (DepEd), state universities and colleges (SUC), National Commission for Indigenous People (NCIP), local government units (LGU), Technical Education and Skills Development Authority (TESDA) and the CHED. The total amount for SGIAL allocated from PDAF varies from year to year depending on the priorities of the congressmen and senators.

From the DBM website at www.dbm.gov.ph copies of the PDAF releases for the years 2009, 2010 and 2011 were downloaded and the specific releases for scholarship programs of various implementing agencies as specified in the menu were extracted. For the three years that were studied it shows an increasing trend in the allocation by legislators to scholarship of their PDAF. The allocation of half a billion in 2009 rose by 60% to more than Php800M in 2010 and almost Php1.5B in 2011. This trend underscores the fact that legislators consider scholarship programs as one of the priority uses of government funds.

From Agency Central Office to Regional Office

Almost all agencies have regional offices (RO) following the move during the early '70's decentralizing government services aiming to bring these closer to the people at the grassroots level affording them easier access. Such is true in the case of the major implementers of SGIAL like CHED, DOST, DepEd, and other decentralized departments. Notwithstanding this set-up, CHED and DOST scholarship funds are managed centrally, i.e., DBM release the funds to CHED and DOST central office (CO), who in turn release this to their respective RO by way of sub-allotments upon determination of the actual funds needed for scholars for each region. ROs then disburse the funds by paying the entitlement of scholars or grantees of the region.

From Regional Office to SGIAL Awardees and Grantees

1. DOST

DOST has a strict screening process in the selection of undergraduate scholars who must pass a qualifying test which is conducted nationwide in DOST test centers. The formal selection process enables the department to insulate itself from outside influence that may want to dictate beneficiaries to its scholarship program, particularly benefactors of SGIAL funds. Regional test centers qualify the applicant-examinees and forward these to CO for review and validation at two levels: at the level of the national committee and finally, at the level of the advisory committee. Deliberations are made at all levels with only examination numbers identifying each examinee to prevent unwanted abuse of discretion in qualifying awardees and grantees. Upon determination of the final list of qualifiers, the examination number is matched with the names of the applicants and are published on the DOST website.

A Notice of Award is given each qualifier and they are given an orientation on the contract that they must sign with DOST. All qualified scholars are then required to open accounts with the Land Bank of the Philippines with which DOST has a memorandum of agreement (MOA) and to which their stipends and other entitlements will be deposited by DOST. Land Bank issues special ATM cards that identifies the holder as a DOST scholar. In the case of tuition and other allowed school fees, DOST pays this upon receipt of the bill from the higher education institution (HEI) where the scholar is enrolled or reimburses the scholar upon presentation of official receipts issued by the HEI for the fees he paid. Scholars must enroll only in degree programs and in HEIs identified by DOST. Before payment of stipends commences, a letter of enrolment or certificate of enrolment issued by the HEI must be submitted by the scholar. This is required every semester thereafter.

For graduate scholarship programs administered by the department, there is no formal testing but a review of required documents certifying to the qualifications of the applicant is made. Meanwhile, DOST focuses the scholarship grants to fields they have determined to be priority areas that will help industry and eventually contribute to production that will fuel economic development and growth.

2. CHED

CHED evaluates and qualifies applicants for scholarship and grants by reviewing documents required for submission subjecting these to prescribed CHED requirements as provided in applicable CMOs. CHED does not conduct testing. Initially they conducted a test too in addition to evaluating documentary requirements but stopped it for lack of funds to sustain it. Upon determination of the scholars in each region, funds are sub-allotted to the RO by CO and the corresponding cash for the allotment is released subject to the availability of cash in CO. Releases are made on a quarterly basis for allotments while cash to cover the allotment is released monthly.

CHED RO observes the imprest system in paying entitlements of awardees/grantees. That is, payments are made through checks.

3. PDAF

SGIAL fund coming from PDAF is released to the implementing agency and to the scholar or HEI as the case may be. If the intended beneficiary of the fund is a private HEI then it is coursed through CHED. CHED in turn releases this to the private HEI in the form of a cash advance that the HEI must liquidate following government accounting rules and regulations on liquidation. If it is an SUC then it is released by DBM directly to the SUC. IF no HEI is specified then DBM releases it to CHED. More often than not, CHED has limited or no participation at all in the selection of scholars and grantees from PDAF SGIAL funds. In some cases such funds have pre-selected beneficiaries and pre-determined cash entitlements. That is, a list of awardees/grantees with designated amounts for each one in the list is provided by the office of the legislator. In cases such as this, CHED is powerless to require from the awardees/grantees evidences of qualification and enrolment in an HEI and simply draws the check payable to the proposed grantee. Meanwhile, PDAF funds released to SUCs are subjected to SUC processes for qualifying awardees or grantees.

CHED and SUCs implementing the scholarship program from PDAF funds observe the imprest system in paying entitlements of awardees/grantees.

III. Strengths of the Financial Process

1. DOST

DOST procedures for availing and disbursing funds for SGIAL out of the GAA is relatively safe and free from possible misuse or misappropriation. There are no adverse opinions from the Commission On Audit on the way DOST manages SGIAL funds. Moreover, eliminating the need to disburse cash directly to awardees/grantees by doing this through the bank ensures not only the safety of the cash funds but of the DOST disbursing officers and scholars as well. Furthermore, they have identified a university coordinator in each of the participating HEIs to monitor DOST scholars.

Likewise, DOST's strict screening process prevents unwanted interference from sectors that may want to influence the results of the tests to serve their vested interest. To insure that there is application of the rules and regulations for screening of applicants is uniform in all DOST ROs, DOST CO issues department memoranda and circulars.

The DOST sub-unit that implements its scholarship program is the Science Education Institute (SEI). A study of the audit reports prepared by the Commission on Audit (COA) on the operations of SEI for the years 2010 and 2011 reveal no major findings in the way the scholarship program is being managed and administered by the agency. The overall opinion of the COA is qualified but not adverse. This is an indication that generally its management is acceptable.

2. CHED

CHED has adopted rules and regulations circularized to all CHED ROs to follow and observe in the evaluation and qualification of applicants for SGIAL awards and grants. Like DOST, CHED accounts and reports on SGIAL funds received from the GAA following standard government accounting rules and regulations. They observe the imprest system in making payments and all transactions are subject to post-review by the state auditor assigned to audit CHED financial accounts. This in itself deters scrupulous persons from misuse and misappropriation of the funds.

CHED is a major recipient of scholarship funds from PDAF. It was revealed, however, that there is not much CHED can do in the evaluation and selection of grantees charged to PDAF funds because most of the time they would have been pre-determined by the legislator upon whose recommendation the funds have been released.

IV. Weakness of the Financial Process

Administering scholarship funds have certain nuances that do not fit well with national procedures in the release of funds. For one, the fiscal year and the academic year do not jibe. The fiscal year is from January to December while the academic year is from June to May. The requirements for an academic year that started in June spills over to the next fiscal year. DOST and CHED have to carefully consider this in their planning for the use of budgeted SGIAL funds from the GAA.

There is an obligation to scholars by DOST and CHED to assure a continuous flow of stipends that is affected when the fiscal year ends. Currently, maintenance and other operating expenses funds (MOOE), the expense classification that includes SGIAL funds, have a two-fiscal year life so this problem is minimized. Next year there is a plan to make funds good for just one fiscal year. If this happens it will create scheduling and timing complications for administering SGIAL funds from the GAA. Moreover, delay in the approval of the next budget that will also delay subsequent release of funds for SGIAL from the GAA will heighten this problem.

Notwithstanding the approval of the MCP of agencies, cash releases are still subject to the availability of cash in the national treasury. Thus, it is not unusual for agencies to receive less cash

than they actually need and the agency is forced to prioritize its needs for cash. The timely receipt of stipends and other entitlements of awardees/grantees will be adversely affected unless DOST and CHED prioritizes cash for this purpose at all times regardless of the agencies' other pressing needs. DBM releases cash monthly and the unutilized portions of NCAs lapse at the end of the month. Requesting for reissuance of this cash takes quite a while. This exacerbates the problem caused by the lack of cash of agencies. Stipends may be delayed and this is not good for the scholars.

The inability of CHED and other implementing agencies identified in the menu to impose the same rules and regulations on PDAF funds is a matter of concern. It diminishes the integrity of the scholarship program of government to have varying degrees of imposing controls or no control at all for the utilization of funds coming from the same source. Moreover, inasmuch as the CHED scholarship program provides for slots for all towns and municipalities, a situation is created in a municipality where a congressman decides to use part of his PDAF for scholarship. The possibility of obvious inequitable privileges will happen.

V. Recommended Solutions

1. Retention of the current two-fiscal year life for scholarship funds included in the GAA. That is, MOOE funds appropriated for scholarship programs will not be subject to immediate reversion after one year which is the plan of the national government starting CY 2013.
2. Continuous availability of NCA balances for MOOE of agencies administering scholarship funds from the GAA. That is, they will be exempt from the national policy as practiced by DBM that imposes lapsing of the unutilized portions of NCA at month's end.
3. Awardees/grantees of scholarship funds allocated from PDAF will be subject to the same rules and regulations for evaluating and qualifying scholars observed by the implementing agency through which the PDAF SGIAL fund is released. Selection of beneficiaries of PDAF scholarship funds must be competitive.
4. CHED must require awardees/grantees to pass an aptitude or a test that will indicate their capacity to pursue tertiary level education. Considering the amount of funds allocated for scholarships there should be enough assurance the investment in the selected grantees will pay off and for this to happen they must first be able to graduate. Tying up with HEIs that have credible college admission test must be considered by CHED to save on the cost of developing and administering its own.
5. As an alternative solution to the problems on lapsing NCA and expiring funds allocation from DBM is the creation of a scholarship trust fund to which releases from the GAA will be transferred. This will solve the problems caused by a non-synchronized fiscal and academic year. It will also insure the availability of actual cash to pay entitlements of scholars on time. This also enables the agency implementing the scholarship program to have a better basis for planning and budgeting the funds allocated for the purpose that is released to it. This is highly recommended.

Annex A. Matrix Analysis of Strengths, Weaknesses of Financial Controls and Recommended Solutions

| PARTICULARS | STRENGTH | WEAKNESS | RECOMMENDATION |
|--|---|---|--|
| 1. Release of fund from DBM to implementing agency: a) DOST scholarship budget b) CHED scholarship budget c) SUC d) PDAF | <ul style="list-style-type: none"> Follows standard government rules and regulations Subject to COA audit | <ul style="list-style-type: none"> Non-synchronized fiscal and academic year Cash availability for stipends affected by lapsing NCA | <ul style="list-style-type: none"> Retain two-fiscal year life of scholarship funds Exempt NCA for MOOE of DOST, CHED, SUC from policy on monthly lapsing of NCA Creation of a scholarship trust fund |
| 2. Release of fund from implementing CO to RO to awardees/grantees | <ul style="list-style-type: none"> Same as above | | |
| a) DOST | <ul style="list-style-type: none"> Releases entitlements through the bank NTA University coordinator | <ul style="list-style-type: none"> Delays due to lapsing NCA | <ul style="list-style-type: none"> Exempt cash for MOOE from policy on monthly lapsing of NCA |
| b) CHED and SUC | <ul style="list-style-type: none"> Paid by check | <ul style="list-style-type: none"> Delays due to lapsing NCA | <ul style="list-style-type: none"> Exempt cash for MOOE from policy on monthly lapsing of NCA |
| c) PDAF | <ul style="list-style-type: none"> Paid by check | <ul style="list-style-type: none"> Delays due to lapsing NCA Non-strict application of qualification process | <ul style="list-style-type: none"> Exempt cash for scholarship from policy on monthly lapsing of NCA Subject awardees/grantee to CHED/SUC selection process |

ANNEX B. Study of Audit Report with Focus on Scholarships

TESDA

-CY 2010 AAR

- A number of findings that appear to be caused by poor or lack of monitoring of TBPs by TESDA and questionable activities by some TBPs
- Cash advances amounting to almost 50% of releases remain unliquidated at the end of the year
- COA did a random sampling of the purported trainees (24,612) of the TBP with the biggest fund allocation (Php147,685,990) to verify on whether at least 60% of the graduates have been employed as called for in the MOA. The verification of 211 purported scholars revealed that only 50 responded and were reachable and the rest appeared to have provided invalid or dubious contact numbers. Of the 50 who responded 42 actually received on the job training by the call center and were made to be PGS scholars, 1 is employed but not connected to his training, 1 took the training for experience, 6 remain to be unemployed and 3 have confirmed they were made to sign receipts to accept the allowance but did not go through any training at all. COA concluded this finding is remarkable since the sample is not even 1% of the population and the findings are not favorable!
- There are deficiencies in the MOA/contract between TESDA and TBPs as it did not include sanctions for non-compliance, no obligations for graduates to report back to TBP upon employment, no monitoring of graduates, no evaluation of what training programs must be continued or discontinued, etc., and overall the lack of a data base of scholars for monitoring, evaluation and control.
- TESDA issued TESDA Order No. 172 to address the issues raised by COA and to institute monitoring and control mechanisms both structurally and policy-wise to mitigate the weakness in their scholarship program and provide stricter rules in availing of their scholarship programs.

(Comment: The materiality of the findings of COA not only in the TESDA scholarship program but in other aspects of its operations as well led them to give an adverse opinion on its CY 2010 operations.)

CHED

-CY 2010

On Scholarship Programs

- COA findings reveal that only 1,757 out of 3,500 available slots were actually awarded. CHED explained there were many reasons for non-achievement of the target number, including, lack of qualified applicants due to certain rules like non-tenure in the HEI where they are serving, unattractive benefits like too low stipend compared to DOST scholarships, DBM disregard for promotion purposes of non-thesis program, lack of HEI funds to hire substitute faculty to replace those on full time study for a thesis program, lack of support by HEI for their faculty and CHED program, lack of available HEI where faculty could enroll locally, and non-qualification of faculty due to their poor academic preparation.
- More private HEI faculty was grantees over SUC faculty and the number of graduates compared to the grantees was low partly because of extensions. COA recommends a tighter control in monitoring the progress of scholars through a complete data base and stricter enforcement of the conditions of the scholarship agreement, particularly where the scholar has defaulted on the contract and reimbursement must be made.
- CHED has addressed the above findings by re-evaluating and reducing their target from 3,500 to 2,139 to be more realistic. It has also given more slots to SUC faculty and increased the stipends to make the scholarship more attractive. In addition, a CHED Memorandum released to all HEIs both public and private to comply with the requirement that all faculty members must have master's degrees.

On "Study Now Pay Later" or the Loan Program under RA No. 6014

- CHEDROs implement the SNPLP. As recorded, a total of Php150,685,431.21 has been released to student borrowers through HEIs where they were enrolled but collections have been very minimal. From a low of .08% to 3% of total loans availed of. Region 9 has no data on collections and NCR has no data on overdue accounts available during the audit.
- CHED has adjusted the repayment scheme by allowing amortizing the loan within ten years while the law provides it be repaid two years after the borrower/graduate has started working.
- Information on the borrowers is inadequate and becomes worse once they have graduated. Monitoring is very poor and demand letters have been sent where information on addresses is available but most of this were returned as the graduates were no longer staying in those addresses. Practically, there is no data base on the profile of student borrowers.
- In response to the COA recommendations for CHED to adopt more proactive measures to collect on the loans suggesting that it may coordinate with other government agencies to

look for the addresses of the debtors/borrowers, some regions plan to coordinate with the BIR and NBI.

(Comment: Notwithstanding the findings of the COA, particularly on the SNPLP, the COA rendered a qualified and not an adverse opinion.)

SEI-DOST

-CY 2010 AAR

- Touched on the inadequacy of budget allocation to fund awarded scholarships caused presumably by the following which resulted in delays in payment of benefits to scholars which COA attributes to poor planning and targeting of requirements

(Comments: These could really be due to a) incompatibility of duration of scholarship contract which is for 4 years while funds are available only at most for 2 years, and b) conflicting provisions in RA 7687 requiring the provision of a certain number of slots per municipality while fixing the total amount of the budget for scholarship leading to the deficit. It should be noted that budgetary policy and rule does not. Notwithstanding the findings COA issued a qualified opinion and not an adverse one.)

- Touched on the lack of or inadequacy of a scholars' data base for proper monitoring and control

-CY 2011

- Issues in CY 2010 AAR have been partially addressed and deficit has been resolved but the fact of a multi-year contract viz a 2-year availability of funds remains a technical problem out of the control of SE!
- Inadequate funds for undergraduate scholarships still an issue
- Institution of a university coordinator for its graduate scholarships has minimized the problem but there are still unliquidated fund transfers to private and public HEIs where DOST scholars are enrolled implying there is room for improvement

(Comments: Except for the observations made COA did not issue an adverse opinion but only a qualified opinion.)

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