



FOLLOWUP REVIEW

**CONTROLS OVER CONTRACTS/GRANTS
WITH EXPIRED PERFORMANCE PERIODS**

**OIG Report 96-5(H)
August 1, 1996**

BACKGROUND

This attached final report updates the status of open contracts/grants with expired performance dates that were (1) identified in prior reports and memorandum and (2) included in our updated sample.

This report follows up on OIG Report 95-23(H), May 1, 1995; followup letter of October 31, 1995; and draft OIG Report 96-5(H), April 4, 1996, which identified the potential for improved controls over contracts/grants with expired performance periods, including potential deobligations. Emphasis was placed on identifying the extent of actions on expired grants noted as having fund balances and the potential for deobligations in prior reports and additional grants for which the performance period expired subsequent to our prior review samples.

SCOPE AND METHODOLOGY

Followup action was initiated on grants noted in Report 95-23(H) to identify additional actions and current status with respect to the categories of grants noted as having expired as of September 30, 1994, and having fund balances as of March 31 and June 30, 1996.

We also utilized a March 26, 1996 listing provided by the ARC Finance Office to identify open grants for which the performance period expired subsequent to September 30, 1994, and tested these grants to identify the extent of actions and potential deobligations. Data on fund balances as of March 31 and June 30, 1996, was obtained.

The following details are divided into two sections, followup on grants noted in prior reports and additional grants with expired performance periods with grant activity noted through June 30, 1996.

RESULTS

Actions are continuing to resolve the status of expired grants, including closings and deobligations; and recent expirations have received substantial attention. However, there remains a need to address a core of the oldest expired grants and initiate action to close the grants; deobligate funds, as appropriate; and redistribute available funds for better use. For example, this report notes that actions were initiated on 68 of the 94 grants identified in report 95-23(H), dated May 1, 1995, including 58 closings, and that, in 29 cases, deobligations and refunds totaling \$914,857 resulted. However, 31 of the noted grants remain open with unused balances of \$654,220. Also, 2 grants

for which performance periods were previously extended were noted as now expired with balances of \$148,675.

We also tested grants with expiration dates between October 1, 1994, and September 30, 1995, that were open as of March 31, 1996, and grants with expiration dates through March 31, 1996, for which no funds were claimed as of March 31, 1996. This analysis disclosed that closing actions had been initiated on 20 of the 51 grants included in these categories, including deobligations and refunds in 11 cases of \$350,101. As of June 30, 1996, 29 grants in these categories remained open with balances totaling \$1,372,249 and expired performance periods. Two grants were given extended performance periods.

Also included in this report are 6 older grants that were omitted from prior reports. These grants, which appeared appropriate for further action had balances of \$182,463 as of June 30, 1996.

A copy of this report was provided in draft to ARC on April 4, 1996, with updated information through March 31, 1996. This final report reflects that between April 1 and June 30, 1996, action was initiated to close 31 grants noted in the draft report, including deobligations and refunds totaling \$654,531 in 19 cases.

Our conclusions and recommendations are primarily based on good business and grant management practices that encourage and/or require timely use of funds and expenditures within approved performance periods. Significant delays in project initiation and/or completion and limited followup and performance period extensions can impact on the eligibility of claimed costs. Also, in some cases, the apparent delay in project start as evidenced by a lack of requests for funds indicates a need for increased consideration about invoking ARC Code Section 18-7.11, Time Limitation of Project Activities, which states "The Commission may revoke or revise its approval of any projects (excluding projects under Section 201) if the work intended to be assisted is not underway within 18 months after the date of approval of such project."

A recent ARC reorganization impacting on grant administration activities should permit additional control and emphasis with respect to identification and followup on expired grants. ARC management has assigned resources to address this condition and anticipates action on older grants will be completed within FY 1996. Also, continued aggressive action continues with respect to closing of basic agency administered grants; and substantial deobligations and use of recovered funds on other projects have resulted from this effort.

The following narrative information and corresponding tables summarize the results of our followup review and analysis.

A. Followup on Grants Included in Report 95-23(H) and Memorandum of October 31, 1995

1. During the period since issuance of Report 95-23(H), actions were initiated on 68 of 94 grants identified in this report. These actions, which affected about \$6.5 million in grant approvals, included 58 closings with resulting deobligations and refunds in 29 cases of \$914,857; extensions of performance periods in 9 cases;

and one progress payment. These actions are commendable and are in line with management initiatives and priorities to ensure timely use of funds and/or action to provide for use of unneeded funds on other priority projects. The following subparts identify grants and issues for which continuing and additional action is appropriate.

2. In 12 of 24 instances noted in Report 95-23(H) where grant performance periods had expired without any drawdowns, there remained no drawdowns as of June 30, 1996; and the period since grant expiration ranged from 21 to 81 months. In 10 cases, the grant had also been included in Report 94-19(H), September 30, 1994. These 13 grants had balances of \$332,848 (Table A).
3. In 4 of 16 instances noted in our prior report where 50 percent or more of approved funds remained available substantially after the end of the expiration period, no actions or additional drawdowns were noted and fund balances of \$82,805 remained for these 4 grants (Table B). The period since grant expiration ranged from 21 to 57 months for these grants.
4. In 15 of 54 instances noted in our prior report where less than 50 percent of approved funds remained available substantially after the end of the expiration period, no actions or additional drawdowns were noted; and fund balances of \$238,567 remained for these grants. The period since grant expiration ranged from 24 to 83 months for these grants (Table C).
5. In 8 cases, grants noted in Report 95-23(H) had been approved extended performance periods. As of June 30, 1996, 5 of these grants remained open with the revised performance periods expired in 2 cases as of June 30, 1996. The remaining balances for these 5 grants totaled \$239,597, including \$148,675 for the 2 grants with expired periods (Table D).
6. An interim memorandum, dated October 31, 1995, identified 29 grants with the best potential for closing and fund deobligations. As of June 30, 1996, no action had been initiated on 21 of these grants with unused balances of \$270,156. This included 9 grants, with balances of \$48,473, for which no claims for reimbursement have been submitted by grantee and the performance periods have been expired from 31 to 81 months. For 11 other cases, the last drawdown occurred between March 24, 1989, and October 4, 1993. In one instance, the grant was extended until December 31, 1997. A review of project and finance files indicates little followup action to determine the status of the projects, extend performance periods, or deobligate funds. In some cases, the projects had been assigned to project coordinators who are no longer with ARC; but we were unable to identify plausible reasons for continued inaction on these grants. The specific grants are included in the summary totals in the prior subparts and are part of Table J, which identified examples of grants for which several prior recommendations for action have been made. Priority emphasis should be placed on closing these grants.

B. Additional Grants with Expired Performance Periods

Our followup review emphasized review grants with initial or revised expiration dates between October 1, 1994, and September 30, 1995, and open grants with no drawdowns of funds as of March 31, 1996, including grants with expiration dates through March 31, 1996. The results of this work are summarized below, and examples are included in Tables E through H.

1. In 2 cases, grants expiring between October 1, 1994, and September 30, 1995, had no drawdowns and balances totaling \$146,447. The period of time since grant expiration ranged from 9 to 13 months as of June 30, 1996 (Table E).
2. In 4 cases, grants expiring between October 1, 1994 and September 30, 1995, had at least 50 percent of funds available, with the total available funds being \$72,440. The period of time since grant expiration ranged from 13 to 17 months (Table F).
3. Also, we identified 19 grants expiring between October 1, 1994, and September 30, 1995, that had less than 50-percent balances totaling \$541,559 as of June 30, 1996 (Table G).
4. In 6 cases, grants expiring between November 30, 1995 and June 30, 1996, had no drawdowns as of June 30, 1996, and balances totaling \$611,803. While these grants have more recent expiration dates, they provide examples of where ongoing followup could be initiated during the grant period to determine grant status and expectations for timely performance (Table H).
4. In 6 instances, old grants not included in our prior reports were identified as having potential for closing and fund deobligation. The balances in these grants, which had expired performance periods ranging from 24 to 93 months, totaled \$182,463 (Table I).

C. Table K identifies 31 grants included in draft Report 96-5(H), April 4, 1996, for which closing actions were initiated as of June 30, 1996. Actions included payments of \$1.7 million and deobligations and refunds of \$728,207. This includes actions on older grants identified in Report 95-23(H) as well as newer grants included in additional samples.

ANALYSIS AND EXAMPLES

As also noted in our prior report, there were few cases where performance periods had been extended; there was limited indication in grant files with respect to contacts with grantees about grant status or reasons for continued nonexpenditure of, or need for, remaining funds; and many of the noted grants were the responsibility of one current and several former project coordinators.

- o For example, Report 95-23(H) highlighted grants 91-99 and 92-184, Kentucky Work Force Development Cabinet, Kentucky Literacy Commission. These grants for \$137,281 and \$100,000, respectively, were noted as having balances of \$20,169 and \$39,806. They expired June 30, 1992, and June 30, 1993; and the last drawdowns were noted as December 8, 1992, and May 11, 1993. We reported we had been informed that one grantee (Kentucky Literacy Commission) was dissolved in 1994 and there had been no recent activity. The grantee was notified that we would recommend ARC followup to close the grants. As of June 30, 1996, no action had been taken on these grants; and balances of \$20,169 and \$39,806 remained available.

- o We also noted a pattern of underuse of funds relative to annual grants to two state agencies for technical assistance programs and delayed actions to deobligate balances for redistribution to other projects. These type grants usually involve a similar amount of funds annually, and the availability of timely reports on fund use could provide grant application reviewers with important information on which to better assess the reasonableness of fund requests. The two situations follow:

Grants related to technical assistance, 92-104, 93-79, 94-85, reflected the potential for improved grant administration resulting from improved followup with grantees. The grantee was approved \$175,000 under each of the noted grants. As of March 31, 1996, the remaining balances were \$77,748; \$68,969; and \$73,491, respectively, with grant expiration dates being May 30, 1994; June 30, 1994; and June 30, 1995, respectively. Our recent on-site review included recommendations for the grantee to advise ARC that \$220,208 should be deobligated and for requesting future funding more in line with actual needs. Timely project coordinator followup about the nonuse of available funds would have identified the condition and permitted more timely action to obtain deobligations, redistribute available funds, and improve evaluation of annual fund requests.

A similar type situation applies to grants 91-162, 92-187, 93-139, and 94-109 that were \$350,000 annual grants for a state technical assistance program. Grants 91-162, 92-187, and 93-139 had initial and/or revised expiration dates of March 31, 1994; November 30, 1993; and September 30, 1994, respectively, and were identified in prior expired grant survey reports and individual grant reviews as being open substantially after noted expiration dates. These grants were closed on February 29, 1996; December 7, 1995; January 31, 1996, and June 5, 1996, respectively, including deobligations of \$131,780; \$85,888; \$171,638, and \$138,021, respectively. Controls to ensure timely followup and procedures allowing action in such cases could result in more timely deobligation and redistribution of funds. Also, information about underuse of funds should be used when evaluating grant requests.

- o ARC Contract 92-125, for \$10,000 to assist a local community organization with the purchase of books and equipment for a planned library, had an original

expiration date of June 30, 1993. The grant was initially extended to December 31, 1995; and on April 10, 1996, it was extended to December 31, 1997. As of June 30, 1996, no funds had been disbursed. The recommendation for extension notes that, as of April 1996, the local community, through various community actions since 1992, had raised \$106,000 of the \$950,000 project cost. Although the efforts are very positive, the potential for near term accumulation of necessary funds is limited; and, in the interim period, the potential for use of ARC allocated funds on other projects should be considered..

RECOMMENDATIONS

Grant administration procedures should be issued dealing with followup on inactive and expired grants that include:

- o Followup action on active grants with expired performance periods within 30 days of the end of the performance period to determine the grant status, including the potential for closing and deobligations or justifiable performance period extensions.
- o Followup action within 30 days of the scheduled expiration date on grants for which no activity has been noted to determine grant status and necessary actions.
- o Pro-forma notification to grantees about impending expiration dates and justification for needed extensions.
- o Periodic identification of grants with expired performance periods, notification to the applicable project coordinator, and appropriate controls to ensure coordinator action.
- o Documentation of project files on the results of followup contacts, including reasons for project delay or extensions of performance periods and estimates of performance time frames.
- o Use of project performance information as a management tool in the planning and approval process.
- o Inclusion of responsibilities for grant monitoring and followup activities in project coordinator position descriptions.
- o Increased implementation of ARC Code Section 18-7.11, Time Limitation on Initiation of Project Activities.

An implementation plan should be prepared establishing time frames for staff review of, and action on, the grants noted in this report.

Auditee Comments

ARC provided updated information on the status of some grants as of June 30, 1996; and the report draft was revised to incorporate this information.

Also, ARC staff noted that the following steps have been or will be taken to place greater controls over contracts/grants with expired performance periods and to ensure appropriate action is taken on all projects identified in OIG report.

- o Reviewed project assignments among the Project Coordinators to determine responsibility for all active contract agreements listed in the report.
- o Highest priority will be given to closing out projects previously reported and to those for which 100-percent balances remain as of 6/30/96.
- o In a limited number of cases, it will be appropriate to extend the contract grant period to allow the grantee to complete ongoing work activities; however, greater emphasis will be given to closing out those projects that show no activity beyond the expiration date.
- o Staff has worked out a new process for notifying grantees about termination of expired grants that show no activity over a number of years, with followup leading to deobligation of the remaining ARC balance of funds.

Auditor Comments

We concur with the above comments and urge that time frames and assignments for action on the grants with the best potential for action be included as part of the noted followup process. We also noted that, since the April 4, 1996 issuance of our initial draft report following up on Report 95-23(H), as of June 30, 1996, closing actions had been completed on 31 grants noted in the draft report with deobligations totaling \$654,531. These grants are not included in this final report. Also, actions were initiated to extend the performance periods of several grants noted in the draft report; and closing actions are in process for several other grants.


Hubert N. Sparks
Inspector General

Attachments
Tables A-K

TABLE A

Grants From Prior Reports
Expired Over One Year With No Funds Expended

NUMBER		EXPIRED	BALANCE 6/30/96	NOTE
88-79	CO-9911CC	9/ 1/89	\$ 1,500	1/
88-86	CO-9911KK	9/ 1/89	13,596	1/
88-113	CO-10165	9/30/89	25,000	1/
92-42	CO-10947M	9/30/94	200,000	2/
92-72	CO-108130	5/30/92	756	1/
92-84	CO-9984A	4/28/93	3,660	1/
92-115	CO-10813R	9/30/92	796	1/
92-116	CO-10813Q	5/30/92	765	1/
93-11	KY-11194	5/31/94	36,000	2/
93-22	CO-10813C	12/31/92	800	1/
93-27	CO-10813T	6/30/93	1,600	1/
93-134	NC-11441	8/31/94	48,375	2/
12			\$332,848	

Note:

- 1/ Included in audit reports 94-14(H), 9/30/94, and 95-23(H), 5/1/95, and followup letter, 10/31/95.
- 2/ Included in audit report 95-23(H), 5/1/95.

TABLE B

Grants From Prior Reports Expired Over One Year
With Less Than 50-Percent of Funds Expended

NUMBER	AMOUNT	EXPIRED	LAST DRAWDOWN	BALANCE 6/30/96	NOTE
90-90	68,000	9/30/91	4/30/91	61,597	1/
92-31	4,260	5/ 1/93	8/10/92	3,200	1/
92-90	20,000	8/31/92	9/16/92	11,096	1/
94-8	10,000	9/30/94	5/9/94	6,912	2/
4	\$102,260			\$82,805	

Note:

- 1/ These grants were previously included in OIG reports 94-14(H), 9/30/94, and 95-23(H), 5/1/95, and followup letter, 10/31/95.
- 2/ Noted in OIG Report 95-23(H), 5/1/95.

TABLE C

Grants From Prior Reports Expired Over One Year
With More Than 50-Percent of Funds Expended

NUMBER	AMOUNT	EXPIRED	LAST DRAWDOWN	BALANCE 6/30/96	NOTE
88-67	\$ 30,000	8/31/89	6/21/89	\$ 9,537	1/
88-81	20,441	8/ 1/89	3/24/89	2,063	1/
89-26	12,000	1/ 3/91	4/10/91	3,090	1/
91-43	100,000	4/30/94	3/25/94	2,000	2/
91-48	65,000	6/30/92	6/18/92	12,481	1/
91-99	137,281	6/30/92	12/ 8/92	20,169	1/
91-104	219,950	6/30/92	6/26/92	52,349	1/
91-135	114,400	3/31/93	8/16/93	2,500	1/
92-136	22,662	7/31/93	10/ 4/93	3,795	1/
92-139	183,600	3/31/94	2/25/94	18,360	2/
92-166	20,000	7/ 1/94	5/10/94	2,000	2/
92-184	100,000	6/30/93	5/11/93	39,806	1/
93-10	4,485	9/30/93	5/11/93	448	2/
93-79	175,000	6/30/94	7/20/95	68,969	2/, 3/
94-43	10,000	6/30/94	5/ 6/94	1,000	2/
15	\$1,214,819			\$238,567	

Note:

- 1/ Included in OIG reports 94-4(H), 9/30/94, and 95-23(H), 5/1/95, and followup letter, 10/31/95.
- 2/ Included in narrative summary of OIG Report 95-23(H), 5/1/95.
- 3/ Progress payment or extension noted, but performance period now expired for at least 1 year.

TABLE D

Grants in Report 95-23(H), May 1, 1995,
for Which Performance Period Was Extended

NUMBER		AMOUNT	REVISED EXPIRATION DATE	BALANCE 6/30/96	NOTE
92-125	CO-11153	\$ 10,000	12/31/97	\$ 10,000	4/
93-19	CO-12220	27,820	4/ 1/96	13,820	1/
93-42	WV-11263	140,000	8/15/96	76,611	2/
93-124	WV11311	186,008	6/30/96	134,855	1/
94-10	NC-114576	30,000	12/31/96	4,311	3/
5		\$393,828		\$239,597	

Note:

- 1/ Revised performance dates expired, and followup on grant status is appropriate.
- 2/ Payment \$20,296 on 4/19/96; and grant extended to 8/15/96.
- 3/ Payment \$10,228 on 5/28/96; and grant extended to 12/31/96.
- 4/ Extended to 12/31/97.

TABLE E

Grants Expiring Between 10/1/94 and 9/30/95
for Which 100-Percent Balances Remain as of 6/30/96

NUMBER		EXPIRATION DATE	BALANCE 6/30/96
93-51	AL-11290	9/30/95	\$137,447
94-140	MS-11512	5/31/95	9,000
2			\$146,447

TABLE F

**Grants Expiring Between 10/1/94 and 9/30/95
for Which at Least 50-Percent of Funds Remain as of 6/30/96**

NUMBER		AMOUNT	EXPIRED	LAST DRAWDOWN	BALANCE 6/30/96
94-66	CO-11537	35,000	5/31/95	5/9/95	22,440
94-102	VA-11496	100,000	1/31/95	11/10/94	50,000
2		\$135,000			\$72,440

TABLE G

Grants Expired Between 10/1/94 and 9/30/95
With Less Than 50-Percent Balances and Not Included in Prior Reports

NUMBER		EXPIRED	AMOUNT	BALANCE 6/30/96	NOTE
92-22	CO-10959	4/15/95	\$ 20,000	\$ 2,938	
93-84	KY-11271	7/31/95	24,000	2,526	
93-91	MD-10952	9/30/95	290,217	84,917	
94-11	NY-11336	2/28/95	67,000	7,628	
94-14	NY-11338	9/30/95	25,000	12,226	1/
94-30	CO-11471	10/15/95	120,000	12,000	
94-36	CO-11469	3/31/95	58,000	2,900	
94-73	GA-11487	6/30/95	94,800	46,826	
94-75	GA-11520	6/30/95	38,500	11,240	
94-77	GA-11253	8/31/95	32,000	3,200	
94-80	NY-11593	2/28/95	7,500	1,432	
94-83	SC-7774	7/31/95	26,770	5,303	
94-85	MS-7763	6/30/95	175,000	73,491	
94-122	NC-7780	9/30/95	397,934	181,154	2/
94-126	NY-10994	6/30/95	76,767	20,145	
94-137	CO-11802	8/31/95	50,000	23,301	
94-145	VA-11573	9/30/95	14,000	6,759	
94-150	PA-11046	9/30/95	215,000	41,458	
95-30	CO-11819B	9/30/95	47,000	2,115	
19			\$1,779,488	\$541,559	

Note:

- 1/ Closing action in process per project coordinator.
- 2/ Grant closed 7/10/96 with deobligation of \$45,083.

TABLE H

**Grants Expiring Between 10/1/95 and 6/30/96
for Which 100-Percent Balances Remained as of 6/30/96**

NUMBER		EXPIRATION DATE	BALANCE 6/30/96	NOTE
94-128	KY-11285	11/30/95	50,000	
94-133	PA-11567	6/30/96	75,000	1/
94-154	AL-11527	3/31/96	141,703	1/
94-159	NY-11729	3/31/96	182,114	1/
95-34	CO-11895	3/31/96	14,185	1/
95-52	NC-11871	5/31/96	148,801	1/
6			\$611,803	

Note:

1/ The expiration dates noted reflect extensions from prior expiration dates.

TABLE I

Older Grants Omitted from Prior Reports

NUMBER		AMOUNT	EXPIRED	LAST DRAWDOWN	BALANCE 6/30/96	NOTE
87-172	OH-9836	\$113,000	9/30/88	7/26/90	\$ 13,045	1/
91-116	AL-10805	144,000	1/31/94	4/30/93	55,623	
92-11	NY-10952	210,000	9/30/93	6/17/93	21,000	
92-99	AL-10978	300,000	4/14/94	6/21/93	14,589	
92-104	MS-7763	175,000	5/30/94	3/23/94	77,748	
92-153	CO-11125B	4,580	6/30/94	6/30/94	458	
6		\$946,580			\$182,463	

Note:

1/

TABLE J

Old Grants for Which No Action Has Been Initiated
 Despite Repeated Recommendations (Included in Prior Tables)

NUMBER		AMOUNT	LAST DRAWDOWN	EXPIRED	BALANCE 6/30/96
88-79	CO-9911CC	\$ 1,500		9/ 1/89	\$ 1,500
88-86	CO-9911KK	13,596		9/ 1/89	13,596
88-113	CO-10165	25,000		9/30/89	25,000
92-72	CO-10813O	756		5/30/92	756
92-84	CO-9984A	3,660		4/28/93	3,660
92-115	CO-10813R	796		9/30/92	796
92-116	CO-10813Q	765		5/30/92	765
93-22	CO-10813C	800		12/31/92	800
93-27	CO-10813T	1,600		6/30/93	1,600
90-90	OH-10532	68,000	4/30/91	9/30/91	61,597
92-31	CO10813	4,260	8/10/92	11/30/92	3,200
92-90	AL-10986	20,000	9/16/92	8/31/92	11,096
88-67	CO-09911S	30,000	6/21/89	8/31/89	9,537
88-81	CO-09911EE	20,441	3/24/89	8/ 1/89	2,063
89-26	CO-10198	12,000	4/10/91	1/ 3/91	3,090
91-48	NY-10525O	65,000	6/18/92	6/30/92	12,481
91-99	KY-10766	137,281	12/ 8/92	6/30/92	20,169
91-104	NC-10793	219,950	6/26/92	9/30/92	52,349
91-135	AL-10752	114,400	8/16/93	3/31/93	2,500
92-136	SC-0774	22,662	10/ 4/93	7/31/93	3,795
92-184	KY-10766	100,000	5/11/93	6/30/93	39,806
21		\$862,467			\$270,156

TABLE K

**Summary of Closing Actions 3/31/96-6/30/96
For Grants Noted in Draft Report 96-5(H), 4/4/96**

CONTRACT NO.	BALANCE INVOLVED	PAYMENT	DEOBLIGATION	NOTE
88-87	\$ 4,536		\$ 4,536	
88-149	95,000	\$ 95,000		
90-82	203,937		203,937	
92-30	37,500		37,500	
92-78	20,000		20,000	
92-180	34,362	7,261	27,101	
93-61	49,711		49,711	
93-96	14,531	851	13,680	
93-107	40,000		40,000	1/
93-113	7,827	6,230	1,597	
93-119	26,500	120,642	15,858	
94-24	30,657		30,657	2/
94-29	3,000	3,000		
94-39	10,000	5,178	4,822	
94-41	5,000	5,000		
94-46	2,434	2,434		
94-52	2,000	2,000		
94-79	115,000	99,747	15,253	
94-89	36,812	32,363	4,449	
94-90	2,500	2,500		
94-91	500,000	496,921	3,079	
94-106	35,000	17,500	17,500	
94-109	350,000	211,979	138,021	
94-115	121,891	121,891		
94-116	36,147	10,467	25,680	
94-119	8,050	8,050		
94-149	5,000	5,000		
95-2	13,046	13,046		
95-15	325,000	323,850	1,150	
95-63	105,750	105,750		
95-93	5,000	5,000		
31	\$2,246,191	\$1,701,660	\$654,531	

Note: Two closings also included a refund for unused funds.

1/	93-107	Refund	\$ 65,714
2/	94-24	Refund	7,962
		Total Deobligation	\$728,207