

**MICRO TECH TRAINING CENTER, INC.  
DBA EASTERN INTERNATIONAL COLLEGE  
JERSEY CITY, NJ 07306**

**WITH AN ADDITIONAL LOCATION AT:  
BELLEVILLE, NEW JERSEY 07109**

**ENTITY No. 22-3145831  
OPE ID No. 031226-00/01  
DUNS No. 783-98-4073  
ACCSC No. M070039 & B070386**

**COMPLIANCE AUDIT  
OF THE TITLE IV STUDENT FINANCIAL ASSISTANCE PROGRAMS  
AT  
684 NEWARK AVENUE, JERSEY CITY, NJ 07306  
&  
251 WASHINGTON AVENUE, BELLEVILLE, NEW JERSEY 07109**

**FOR THE INSTITUTION'S FISCAL YEAR ENDED DECEMBER 31, 2017**

**MICRO TECH TRAINING CENTER, INC.  
DBA EASTERN INTERNATIONAL COLLEGE  
684 NEWARK AVENUE  
JERSEY CITY, NJ 07306**

**FOR THE PERIOD JANUARY 1, 2017 THROUGH DECEMBER 31, 2017**

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COMPLIANCE REPORT

MICRO TECH TRAINING CENTER, INC.  
DBA EASTERN INTERNATIONAL COLLEGE  
JERSEY CITY, NJ 07306

WITH AN ADDITIONAL LOCATION  
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ENTITY No. 22-3145831  
OPE ID No. 031226-00  
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COMPLIANCE AUDIT  
OF THE TITLE IV PROGRAMS

AT

684 NEWARK AVENUE, JERSEY CITY, NJ 07306  
&  
251 WASHINGTON AVENUE, BELLEVILLE, NEW JERSEY 07109

FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT (84.007)

FEDERAL PELL GRANT PROGRAM (84.063)

FEDERAL DIRECT LOAN PROGRAM (FDLP 84.268)

FOR THE INSTITUTION'S FISCAL YEAR ENDED DECEMBER 31, 2017

REPORT PACKAGE COVER PAGE-SERVICER

FINANCIAL AID SERVICES, INC.  
90 STILES ROAD #101  
SALEM, NEW HAMPSHIRE 03079-4884

COMPLIANCE AUDIT  
OF THE TITLE IV STUDENT FINANCIAL ASSISTANCE PROGRAMS

FOR THE FISCAL YEAR ENDED DECEMBER 31, 2016

**AUDITOR'S INFORMATION SHEET**

**MICRO TECH TRAINING CENTER, INC.  
DBA EASTERN INTERNATIONAL COLLEGE  
684 NEWARK AVENUE  
JERSEY CITY, NEW JERSEY 07306  
ENTITY NO. 22-3145831  
OPE ID No. 031226-00  
DUNS NO. 783-98-4073**

**Institution's Information:**

Telephone Number: (201) 216-9901  
Fax Number: (201) 216-9225  
President: Mr. Bashir Mohsen  
Contact Person & Title: Mr. Bashir Mohsen, President  
and Financial Aid Director

**Audit Firm Information:**

Lead Auditor: David A. Levy CPA  
Email Address: dlevy@dalcpapc.net  
License Number: (Home State) CA 678 C Massachusetts  
License Number: (Out of State): 20CC02214400 NJ  
Firm's Name: David A Levy CPA PC  
Partner in Charge: David A. Levy CPA  
Street: 20 Freeman Place  
City, State, Zip: Needham, MA 02492  
Telephone Number: (617) 566-3645 (866) 842-0108  
Fax Number: (866) 681-2377

**Programs Audited ("X" indicates program audited)**

FSEOG	84.007	<u>X</u>
FWS	84.033	
Perkins	84.037 and 84.038	
PELL	84.063	<u>X</u>
Direct Loan	84.268	<u>X</u>
TEACH	84.379	
IASG	84.408	

For the award year that ended during the audit period, the audited ratios for establishing institutional eligibility required by 34 CFR 600.7 (Chapter 3, Section C.1.9.) are as follows:

- |  |     |
|--|-----|
| 1. Correspondence to total courses:  | 0%  |
| 2. Regular Students enrolled in correspondence courses to total regular students | 0%  |
| 3. Regular Students that are incarcerated to total regular students              | 0%  |
| 4. Students enrolled based on ability to benefit to total regular students       | N/A |
| 5. Completion/Placement for Short Programs                                       | N/A |

**EASTERN INTERNATIONAL COLLEGE  
684 NEWARK AVENUE  
JERSEY CITY, NJ 07306**

The campuses considered as part of this entity consist of the two locations noted below:

Address and Name of Location	Was 50% or more of a program offered at this location?	Is location listed on the school's eligibility letter?	Did school notify ED before offering instruction here?	Date location was opened (mm/dd/yyyy)	Date location was closed (mm/dd/yyyy)	Date of auditor's last visit to the location (mm/dd/yyyy)	Reason the location was not visited for this audit
	Yes/ No	Yes/ No	Yes/ No				
Eastern International College 684 Newark Avenue Jersey City, New Jersey 07306	Yes	Yes	Yes	3/18/1990	N/A	2/16/2018	None
Eastern International College 251 Washington Avenue Belleville, New Jersey 07109	Yes	Yes	Yes	8/17/2005	N/A	2/16/2018	None

INSTITUTION'S PRIMARY ACCREDITING ORGANIZATION:

SERVICER

Does the school use a servicer to help it administer all or any portion of its Title IV program responsibilities?

Yes  X  No

Location of the school's accounting and administrative records for Title IV programs administered:

684 Newark Avenue Jersey City, NJ 07306  
and 251 Washington Avenue Belleville, New Jersey 07109

Has the school stopped participating in all Title IV programs?

Yes  No  X

SERVICER INFORMATION SHEET  
FISCAL YEAR 2017

FINANCIAL AID SERVICES, INC.  
90 STILES ROAD #101  
SALEM, NEW HAMPSHIRE 03079-4884  
WWW.FINANCIALAIDSERVICES.COM

**SERVICER INFORMATION**

PRESIDENT: MR. AL GILLIS

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CONTACT PERSON & TITLE: MR. RON BERTON, VP- FINANCE, Ms. SANDI O'CONNELL, VP-OPERATIONS

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TELEPHONE NO.: (603) 868-8184

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FAX NO.: (603) 868-3076

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**SERVICER AUDITOR INFORMATION**

AUDIT FIRM: DAVID A LEVY CPA PC

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PARTNER IN CHARGE: DAVID A LEVY, CPA

---

FIRM ADDRESS: 20 FREEMAN PLACE  
NEEDHAM, MA 02492

---

LEAD AUDITOR: DAVID A LEVY, CPA

---

EMAIL ADDRESS: dlevy@dalcpapc.net

---

TELEPHONE No.: (617) 566-3645 (866) 842-0108

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FAX NO.: (866) 681-2377

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LAST COMPLIANCE ATTESTATION: DECEMBER 31, 2016

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ENGAGEMENT PERIOD: JANUARY 1, 2017-DECEMBER 31, 2017

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DATES OF FIELD WORK: FIVE MONTH ONGOING AUDIT PERIOD  
JANUARY-MAY 2018

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LICENSE No.: CA 678C MASSACHUSETTS, APPROVED TO PRACTICE UNDER THE UNIFORM ACCOUNTANCY ACT AS A SUBSTANTIALLY EQUIVALENT JURISDICTION.

**FINANCIAL AID SERVICES, INC.**  
DIVISION OF DUTIES/FUNCTIONS FOR COMPLIANCE REQUIREMENTS

Compliance Requirement		Performed by School	Performed by Financial Aid Services, Inc.	Explanation of Divided Performance
<b>I.</b>	<b>Institutional eligibility</b>			
A.	Participation agreement/ ECAR	X	X	1.
B.	Legal authorizations	X	X	1.
C.	Approved locations	X	X	1.
D.	Eligible Programs	X	X	1.
E.	Accreditation	X	X	1.
F.	Bonuses, commissions, and other incentive payments	X		
G.	Student recruiting and admissions	X		
H.	Zone Alternative	X		
I.	TEACH grant eligibility and administration	X		
J.	Calculation of the 90/10 ratio	X		
K.	Calculation of other institutional eligibility ratios	X		

**FINANCIAL AID SERVICES, INC.**  
**DIVISION OF DUTIES/FUNCTIONS FOR COMPLIANCE REQUIREMENTS**

Compliance Requirement		Performed by School	Performed by Financial Aid Services, Inc.	Explanation of Divided Performance
<b>II.</b>	<b>Reporting</b>			
A.	Enrollment reporting roster file <sup>(1)</sup>			
	1. Completion	X	X	2.
	2. Changes in enrollment status	X	X	2.
B.	FISAP	X	X	3.
C.	Gainful Employment Reporting	X	X	4.
<b>III.</b>	<b>Student eligibility</b>			
A.	Determining eligibility	X	X	5.
B.	Regular Student	X	X	5.
C.	Enrolled in eligible program	X	X	5.
D.	Citizenship	X	X	5.
E.	Social security number	X	X	5.
F.	Not in overpayment or default status	X	X	5.
G.	Selective service	X	X	5.
H.	Academic credentials	X	X	5.
I.	SAR/ISIR	X	X	5.
J.	Verification	X	X	5. 6.
K.	Prior degrees	X	X	5.
L.	Incarcerated students	X	X	5.
M.	Maintaining satisfactory academic progress	X	X	5.
N.	Professional judgment decisions	X	X	5. 6.
O.	Dependency overrides	X	X	5. 6.
P.	Financial need	X	X	5. 7.
Q.	Calculating the Pell	X	X	5. 8.
R.	Calculating loan amounts	X	X	5. 9.
S.	Master promissory note confirmation process	X	X	5.
T.	PLUS loan amounts and confirmation process	X	X	5. 9.
U.	TEACH grant	X	X	5.
V.	IASG	X	X	5.
W.	Attendance in distance education program	X	X	5.
X.	Student Confirmations	X	X	5.
<b>IV.</b>	<b>Disbursements</b>			
A.	Confirming student eligible for each disbursement	X	X	10.
B.	Valid SAR/ISIR on file	X	X	10.
C.	Determining payment period	X	X	10. 11.
D.	Entering COD data	X	X	12.
E.	Early disbursements	X	X	10.
F.	Verification is complete	X	X	10.
G.	Notices	X	X	10.
H.	Transfer students	X	X	10.
I.	FWS	X	X	10. 13.
J.	Initial counseling	X	X	10.
K.	Exit counseling	X	X	10.
L.	Delivering credit balances and authorizations	X	X	10.
M.	If applicable, maintaining subsidiary ledger for students with credit balance	X	X	10.

<sup>(1)</sup> The School is always responsible, but may share the duties/functions with the Servicer. (Chapter 3, Section C.2.1.)



**FINANCIAL AID SERVICES, INC.**  
**DIVISION OF DUTIES/FUNCTIONS FOR COMPLIANCE REQUIREMENTS**

<b>Compliance Requirement</b>		<b>Performed by School</b>	<b>Performed by Financial Aid Services, Inc.</b>	<b>Explanation of Divided Performance</b>
<b>V.</b>	<b>Return of Title IV Funds</b>			
A.	Policy	X	X	14.
B.	Determining date of withdrawal	X	X	14.
C.	Post-withdrawal disbursements	X	X	14.
D.	Return calculations	X	X	14.
E.	Overpayment calculations	X	X	14.
F.	Allocation of return of Title IV funds	X	X	14.
G.	Timing of return of Title IV funds	X	X	14.
H.	Notifying borrowers of returns of loan proceeds	X	X	14.
<b>VI.</b>	<b>G5 and Cash Management</b>			
A.	Forecasting cash needs	X		
B.	Withdrawing Federal funds	X	X	15.
C.	Disbursing funds			
	1. Posting credits to student accounts	X		
	2. Making the funds available to the student	X		
D.	Returning excess funds	X	X	16.
E.	Accounting for and returning interest earnings	X		
F.	Performing monthly Direct Loan reconciliations	X	X	17.
<b>VII.</b>	<b>Perkins Loan Program</b>			
A.	Approving and maintaining deferment, loan cancellation, and discharge for death or disability documentation	N/A	N/A	18.
B.	Perkins master promissory notes	N/A	N/A	18.
C.	Loan status and loan balances in NSLDS	N/A	N/A	18.
D.	Deferment of loan payments	N/A	N/A	18.
E.	Billing and collections	N/A	N/A	18.
F.	Liquidation	N/A	N/A	18.
<b>VIII.</b>	<b>Administrative Requirements</b>			
A.	Written procedures	X	X	19.
B.	Direct Loan quality assurance system	X		
C.	Satisfactory academic progress measurements	X	X	19.
D.	Reporting change in ownership	X		
E.	Reporting possible illegal conduct	X		
F.	Perkins loan and grant overpayments	X		
G.	Annual security and fire safety reports	X	X	19.
H.	Completion, graduation, and transfer-out rates	X		
I.	Prospective student disclosures for gainful employment programs	X	X	19. 20.
J.	Student warnings for gainful employment program eligibility	X	X	19.

**FINANCIAL AID SERVICES, INC.**  
DIVISION OF DUTIES/FUNCTIONS FOR COMPLIANCE REQUIREMENTS

<b>Compliance Requirement</b>		<b>Performed by School</b>	<b>Performed by Financial Aid Services, Inc.</b>	<b>Explanation of Divided Performance</b>
<b>IX.</b>	<b>Close Out Audits (If Applicable)</b>			
A.	Retaining and storing of records	X	X	21.
B.	Collection of outstanding Perkins Loans	N/A	N/A	18.
C.	Continuing to comply with withdrawal calculations during "teach-out", if applicable	X	X	22.
D.	Returning unexpended Title IV funds to ED	X		
E.	Returning to Direct loan proceeds received but not delivered or credited to student accounts	X		
F.	Disbursements after participation ends	X		

**FINANCIAL AID SERVICES, INC.**  
FOOTNOTES TO DIVISION OF DUTIES/FUNCTIONS FOR  
COMPLIANCE REQUIREMENTS

The School is always responsible, but may share the duties/functions with the Servicer.

**1. Institutional Eligibility:**

**Participation Agreement/ECAR, Legal Authorizations, Approved Locations, Eligible Programs, Accreditation:**

Upon request from the Institution, FAS assists with administrative data entry updates of the ECAR based on information provided by the Institution. The Institution takes full responsibility of obtaining the necessary approvals, maintenance, and administration of its institutional eligibility. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**2. Reporting:**

**Enrollment Reporting Roster (ERR) File Completion/Changes in Enrollment Status:**

FAS provides the means (import/export “batch” data link) to send and receive enrollment status information between the Institution and NSLDS.

The ERR completion timeframe and the accuracy of the ERR information remains with the Institution.

For student enrollment status changes that occur between required ERR reporting periods, FAS advises the Institution to make manual changes directly on the NSLDS Professional Access website. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**3. Reporting:**

**FISAP:**

FAS provides the software interface to the Institution to collect student data for FISAP reporting. The Institution takes responsibility for the accuracy and timely reporting of this information to FAS.

FAS calculates the amount of administrative cost allowance due the Institution. The Institution retains responsibility for allocating this cost allowance.

FISAPs are created from the information supplied by the Institution and information maintained by FAS.

FAS electronically submits the Institution’s FISAP report on the FSA eCampus-Based System.

The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**4. Reporting:**

**Gainful Employment Reporting:**

FAS provides the template and means (import/export “batch” data link) to send annual Gainful Employment reporting information from the Institution to NSLDS. The Institution retains responsibility for ensuring that the template is completed accurately and in a timely manner.

FAS receives the Institution’s Gainful Employment Completer’s Lists from NSLDS and provides the information to the Institution.

The Institution is responsible for reviewing all of the information in the Gainful Employment Completer’s Lists and issuing any appeals to the Dept. of ED.

The Institution is responsible for reviewing and maintaining the accuracy of all of the Gainful Employment information contained in the NSLDS database.

The Institution retains responsibility for updating its websites with the required Gainful Employment Disclosure information.

The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**FINANCIAL AID SERVICES, INC.**  
FOOTNOTES TO DIVISION OF DUTIES/FUNCTIONS FOR  
COMPLIANCE REQUIREMENTS

**5. Student Eligibility:**

FAS examines the Institution's confirmations of student eligibility during periodic reviews of sample student files.

The Institution takes responsibility to perform corrective action based on the periodic reviews of sample student files.

The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**6. Student Eligibility:**

**Verification, Professional Judgment Decisions, Dependency Overrides:**

FAS has the responsibility as a reviewing agent for the Institution's verification, professional judgment, and dependency override processing. The duties/functions are divided between the School 90% and FAS 10% . The institution retains responsibility for the accuracy of this information

**7. Student Eligibility:**

**Financial Need:**

The Institution is responsible for notifying FAS of the direct costs per program in order to calculate cost of attendance budgets.

The Institution is responsible for surveying its student population and providing the data to FAS in order to determine the indirect cost portion of the cost of attendance budgets. The duties/functions are divided between the School 90% and FAS 10% . The institution retains responsibility for the accuracy of this information

**8. Student Eligibility:**

**Calculating the Pell:**

FAS calculates the student's Pell grant based on the student's EFC, cost of attendance (COA), program enrollment status information provided by the Institution, and academic year definition. The duties/functions are divided between the School 90% and FAS 10% . The institution retains responsibility for the accuracy of this information

**9. Student Eligibility:**

**Calculating Loan Amounts:**

The Institution is responsible for performing financial needs analysis and retains responsibility for the accuracy of this data.

During the loan certification process, FAS confirms eligibility for subsidized, unsubsidized, and PLUS loan amounts based on the needs analysis and program enrollment status information provided by the Institution. The duties/functions are divided between the School 90% and FAS 10% . The institution retains responsibility for the accuracy of this information

**10. Disbursements:**

FAS examines the Institution's confirmations of student eligibility for disbursement during periodic reviews of sample student files.

The Institution takes responsibility to perform corrective action based on the periodic reviews of sample student files. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**FINANCIAL AID SERVICES, INC.**  
FOOTNOTES TO DIVISION OF DUTIES/FUNCTIONS FOR  
COMPLIANCE REQUIREMENTS

**11. Disbursements:**

**Determining Payment Period:**

FAS calculates the amount and the timing of the appropriate disbursements based on the program notification information provided by the Institution.

The Institution takes full responsibility for the actual disbursements of the Title IV funds based on its internal student attendance and academic performance records which it must review and verify before disbursement. The duties/functions are divided between the School 80% and FAS 20% . The institution retains responsibility for the accuracy of this information

**12. Disbursements:**

**Entering COD data:**

FAS maintains the system to import/export the federal Pell Grant and Direct Loan files.

The Institution retains responsibility for the accuracy of this data.

The Institution must notify FAS of any changes in the student status (i.e. discontinued and no longer needs second disbursement; student requests reduced amount; refunds, payment period, and/or loan period changes, etc.)

Institution updates FAS on student's payment period start dates, as well as, loan period/academic year end dates per regulation. FAS then updates COD.

The Institution is responsible for submitting required loan period updates to FAS for any Title IV borrower as soon as possible after the student graduates or withdraws. FAS makes the required updates to loan period, academic year, and payment period start dates and electronically transmit this data to COD.

FAS updates the Origination Record and exports it to the ED Servicer. FAS imports the acknowledgement and updates the Origination Record. The duties/functions are divided between the School 75% and FAS 25% . The institution retains responsibility for the accuracy of this information

**13. Disbursements:**

**FWS:**

FAS processes the federal share of all campus-based Title IV funds.

The Institution is responsible for calculating the campus-based Title IV awards based on school policy. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**14. Return of Title IV Funds:**

FAS examines the Institution's confirmations of the Return of Title IV Funds during periodic reviews of sample student files.

The Institution takes responsibility to perform corrective action based on the periodic reviews of sample student files.

The Institution is fully responsible for the identification, calculation, repayment of refunds, and overpayments. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**FINANCIAL AID SERVICES, INC.**  
FOOTNOTES TO DIVISION OF DUTIES/FUNCTIONS FOR  
COMPLIANCE REQUIREMENTS

**15. G5 and Cash Management:**

**Withdrawing Federal Funds:**

FAS determines the timing and amount of the cash disbursements after contact by the Institution that the student is eligible for Title IV funds and has attended first day/week of classes. Subsequent disbursements are determined by the Institution through internal student attendance and academic progress records.

The Institution retains responsibility for ensuring that all eligibility criteria have been met prior to accepting first or subsequent disbursements. The duties/functions are divided between the School 90% and FAS 10% . The institution retains responsibility for the accuracy of this information

**16. G5 and Cash Management:**

**Returning Excess Funds:**

Through the system of authorization for disbursement between the Institution and FAS, cases of excess cash do not exist. Expenditures are reconciled with authorizations through the Institution's payment summary reports, G5, and bank account reconciliations. The duties/functions are divided between the School 90% and FAS 10% . The institution retains responsibility for the accuracy of this information

**17. G5 and Cash Management:**

**Performing Monthly Direct Loan Reconciliations:**

Within the first week of each month, the Institution is required to submit a report listing all Direct Loan disbursements made for the prior month. This report should include student name, disbursement date, and disbursement amount.

Upon receipt, FAS reconciles G5, COD, FAS' internal records, and the Institution's disbursement records.

A copy of this reconciliation packet will be uploaded to the EDGE portal for the Institution's records and a copy will be retained by FAS. This internal control system avoids any unauthorized disbursements. The duties/functions are divided between the School 51% and FAS 49% . The institution retains responsibility for the accuracy of this information

**18. Perkins Loan Program:**

FAS does not contract with any Institutions that offer Perkins Loans. The Institution must notify FAS of its participation in the Perkins Loan Program. The duties/functions are divided between the School 0% and FAS 0% . The institution retains responsibility for the accuracy of this information

**19. Administrative Requirements:**

FAS examines the Institution's administrative requirements during periodic reviews of sample student files. The Institution takes responsibility to perform corrective action based on the periodic reviews of sample student files. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information.

**FINANCIAL AID SERVICES, INC.**  
FOOTNOTES TO DIVISION OF DUTIES/FUNCTIONS FOR  
COMPLIANCE REQUIREMENTS

**20. Administrative Requirements:**

**Prospective Student Disclosures for Gainful Employment Programs**

During the Institution's periodic review, FAS confirms the existence of the Gainful Employment Disclosure only. FAS does not confirm the accuracy of the Institution's reported data.

The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**21. Close Out Audits (If Applicable):**

**Retaining and Storing of Records:**

FAS maintains financial aid records for the current award year only, and provides the Institution with a closeout package of all materials at the end of the award year for appropriate retention.

The Institution is required to comply with all applicable record retention regulations regarding in-house records. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information

**22. Close Out Audits (If Applicable):**

**Continuing to Comply with Withdrawal Calculations during "teach-out", if applicable:**

FAS performs Return of Title IV Calculations based on information provided by the Institution.

The Institution is fully responsible for the identification, calculation, repayment of refunds, and overpayments. The duties/functions are divided between the School 95% and FAS 5% . The institution retains responsibility for the accuracy of this information



**David A Levy CPA PC**  
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Needham, Massachusetts 02492  
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REPORT ON COMPLIANCE FOR STUDENT FINANCIAL ASSISTANCE  
PROGRAMS AND REPORT ON INTERNAL CONTROL OVER  
COMPLIANCE REQUIRED BY THE *Guide for Audits of Proprietary  
Schools and For Compliance Attestation Engagements  
of Third-Party Servicers Administering Title IV Programs*  
(UNMODIFIED OPINION ON COMPLIANCE, NO MATERIAL WEAKNESSES OR SIGNIFICANT DEFICIENCIES  
IN INTERNAL CONTROL OVER COMPLIANCE IDENTIFIED)

**INDEPENDENT AUDITOR’S REPORT**

To the Stockholders  
Micro Tech Training Center, Inc.  
dba Eastern International College  
684 Newark Avenue  
Jersey City, NJ 07306

**REPORT ON COMPLIANCE FOR STUDENT FINANCIAL ASSISTANCE PROGRAMS**

We have audited Micro Tech Training Center, Inc. dba Eastern International College (here after referred to as Eastern International College)’s compliance with the compliance requirements regarding Institutional Eligibility and Participation; Reporting; Student Eligibility; Disbursements; Return of Title IV Funds; G5 and Cash Management; Perkins Loan Program; Administrative Requirements; and Close Out Audit Requirements (as applicable) described in Chapter 3 of the 2016 edition of the U. S. Department of Education’s Guide For Audits of Proprietary Schools and For Compliance Attestation Engagements of Third-Party Servicers Administering Title IV Programs (Guide) relative to Eastern International College ’s Student Financial Assistance (SFA) programs, for the year ended December 31, 2017.

**MANAGEMENT’S RESPONSIBILITY**

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its SFA programs.

**AUDITOR’S RESPONSIBILITY**

Our responsibility is to express an opinion on compliance for Eastern International College’s SFA Programs based on our audit of the compliance requirements referred to above. 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 the Guide. Those standards and the Guide require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the compliance requirements referred to



above occurred. An audit includes examining, on a test basis, evidence about Eastern International College'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 on compliance for SFA programs. However, our audit does not provide a legal determination of Eastern International College's compliance.

### **OPINION ON SFA PROGRAMS**

In our opinion, Eastern International College complied, in all material respects, with the compliance requirements referred to above for the year ended December 31, 2017.

### **REPORT ON INTERNAL CONTROL OVER COMPLIANCE**

Management of Eastern International College is responsible for establishing and maintaining effective internal control over compliance with the compliance requirements referred to above. In planning and performing our audit of compliance, we considered Eastern International College's internal control over compliance with the compliance requirements to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on compliance for SFA programs and to test and report on internal control over compliance in accordance with the Guide, 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 Eastern International College's internal control over compliance.

*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 compliance requirement applicable to SFA programs 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 a material noncompliance with a compliance requirement applicable to SFA programs will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance requirements of applicable SFA programs that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance 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 compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

## PURPOSE OF REPORT

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Guide. Accordingly, this report is not suitable for any other purpose.

A handwritten signature in black ink that reads "David A. Levy CPA PC". The signature is written in a cursive, flowing style.

David A Levy CPA PC  
Needham, Massachusetts  
March 7, 2018

**EASTERN INTERNATIONAL COLLEGE**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**FOR THE ONE YEAR PERIOD ENDED DECEMBER 31, 2017**

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	FPELL	FSEOG	FDLP	TOTAL
<b>TOTAL POPULATION:</b>				
<b><u>Universe</u></b>				
Dollars (G5)	\$ 1,738,786	45,700	3,881,070	5,665,556
Number of Students	468	135	503	628
<b><u>Students Enrolled, graduated or students on an approved leave of absence (Attribute 1):</u></b>				
<b><u>Universe</u></b>				
Dollars	\$ 1,483,069	41,950	3,458,997	4,984,016
Number of Students for Attribute 1	382	119	428	513
<b><u>Sample</u></b>				
Dollars	\$ 176,804	4,400	444,913	626,117
Number of Students for Attribute 1	43	15	50	60
<b><u>Withdrew, dropped out, enrolled but never began attendance during the audit, or terminated students (Attribute 2):</u></b>				
<b><u>Universe</u></b>				
Number of Students for Attribute 2	86	16	75	110
<b><u>Returned/Refunded:</u></b>				
Dollars (G5)	\$ 15,201	1,200	48,175	64,576
<b><u>Sample</u></b>				
Number of Students for Attribute 2	22	3	16	28
<b><u>Returned/Refunded:</u></b>				
Dollars (Sch C)	\$ 4,061	-	2,226	6,287
Number of Students	3	-	1	3

**EASTERN INTERNATIONAL COLLEGE  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
FOR THE ONE YEAR PERIOD ENDED DECEMBER 31, 2017**

**MATERIALITY THRESHOLD**

For the audit of the Institution's compliance with the compliance requirements, we have determined the following materiality thresholds:

Category:	Level of Materiality:
1. Institutional Eligibility & Participation	0% issues of non-compliance
2. Reporting	5% issues of non-compliance & >1
3: Student Eligibility	5% issues of non-compliance & >1
4: Disbursements	5% issues of non-compliance & >1
5: Refunds	5% issues of non-compliance & >1

If the Institution exceeds these thresholds of materiality, we, the auditors will use professional judgment to determine if there is a materiality threshold violation and take appropriate action. These materiality threshold violations are not always considered material weaknesses as defined within the Auditors' Report on Internal Control over Compliance enclosed herein. Since this sample size is 88 files, 5% of this or 4 instances or greater of noncompliance of any of the tested attributes would be considered a materiality threshold violation and thereby reported on, quantified and acted upon.

**SAMPLING METHODOLOGY**

As outlined in the U.S. Department of Education's SFA audit/attestation guide (September, 2016) for our sampling methodology, the Institution's population is divided into two universes;

- a) Universe 1- students who were enrolled, graduated or on approved leave of absence
- b) Universe 2- students who withdrew, dropped out, enrolled but never begun attendance, or were terminated.

The sample size is determined by the size of each universe as detailed below:

Universe	Sample Size
>250	60 students from each universe
100-249	25% of students from each universe
26-99	25 students from each universe
<25	100% of students from each universe

Our sample size is 88 files as shown below:

Student Status	#of students in population	Sample Size
Currently attending / Graduate	521	60
Withdrawn	110	28
Total	631	88

Included in the sample, is the required number of transfer and verification students as outlined in the audit guide.

**EASTERN INTERNATIONAL COLLEGE  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
FOR THE PERIOD ENDED DECEMBER 31, 2017**

**CURRENT AUDIT**

There were no instances of noncompliance noted within the sample population during the current audit.

**EASTERN INTERNATIONAL COLLEGE  
RESOLUTION MATTERS RELATING TO THE STUDENT FINANCIAL  
ASSISTANCE PROGRAMS  
PRIOR AUDIT FINDINGS**

The office of David A Levy CPA PC performed the one-year attestation for the period ended December 31, 2016. There were no instances of noncompliance noted within the sample population during that attestation.

**EASTERN INTERNATIONAL COLLEGE  
684 NEWARK AVENUE  
JERSEY CITY, NJ 07306  
(201) 216-9901**

**CORRECTIVE ACTION PLAN  
FOR THE ONE YEAR PERIOD ENDED DECEMBER 31, 2017**

Audit Firm: David A Levy CPA PC  
Audit Period: January 1, 2017 - December 31, 2017

*Please see the attached, signed PDF file:  
Corrective Action Plan  
Eastern International College*

CURRENT AUDIT

There were no instances of noncompliance noted during the current audit; therefore, no corrective action is required.

PRIOR ATTESTATION

There were no instances of noncompliance noted during the prior attestation; therefore, no corrective action was required and no current status is applicable.

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Mr. Bashir Mohsen, President  
Eastern International College

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Date

**Summary Schedule A  
STUDENT ELIGIBILITY  
Eastern International College  
Jersey City, NJ  
December 31, 2017**

	A	B Not meeting satisfactory	C	D	E	F	G	H	I
Student / Number	Student file not found	academic progress (SAP)	Original ISIR not found	Not a regular student	Non- eligible citizen	Incorrect SSN	Dependency override not documented	Professional judgment not documented	Title IV exceeds need
1	N	N	N	N	N	N	N	N	N
2	N	N	N	N	N	N	N	N	N
3	N	N	N	N	N	N	N	N	N
4	N	N	N	N	N	N	N	N	N
5	N	N	N	N	N	N	N	N	N
6	N	N	N	N	N	N	N	N	N
7	N	N	N	N	N	N	N	N	N
8	N	N	N	N	N	N	N	N	N
9	N	N	N	N	N	N	N	N	N
10	N	N	N	N	N	N	N	N	N
11	N	N	N	N	N	N	N	N	N
12	N	N	N	N	N	N	N	N	N
13	N	N	N	N	N	N	N	N	N
14	N	N	N	N	N	N	N	N	N
15	N	N	N	N	N	N	N	N	N
16	N	N	N	N	N	N	N	N	N
17	N	N	N	N	N	N	N	N	N
18	N	N	N	N	N	N	N	N	N
19	N	N	N	N	N	N	N	N	N
20	N	N	N	N	N	N	N	N	N
21	N	N	N	N	N	N	N	N	N
22	N	N	N	N	N	N	N	N	N
23	N	N	N	N	N	N	N	N	N
24	N	N	N	N	N	N	N	N	N
25	N	N	N	N	N	N	N	N	N
26	N	N	N	N	N	N	N	N	N
27	N	N	N	N	N	N	N	N	N
28	N	N	N	N	N	N	N	N	N
29	N	N	N	N	N	N	N	N	N
30	N	N	N	N	N	N	N	N	N
31	N	N	N	N	N	N	N	N	N
32	N	N	N	N	N	N	N	N	N
33	N	N	N	N	N	N	N	N	N
34	N	N	N	N	N	N	N	N	N
35	N	N	N	N	N	N	N	N	N
36	N	N	N	N	N	N	N	N	N
37	N	N	N	N	N	N	N	N	N
38	N	N	N	N	N	N	N	N	N
39	N	N	N	N	N	N	N	N	N
40	N	N	N	N	N	N	N	N	N
41	N	N	N	N	N	N	N	N	N
42	N	N	N	N	N	N	N	N	N
43	N	N	N	N	N	N	N	N	N
44	N	N	N	N	N	N	N	N	N
45	N	N	N	N	N	N	N	N	N
46	N	N	N	N	N	N	N	N	N
47	N	N	N	N	N	N	N	N	N
48	N	N	N	N	N	N	N	N	N
49	N	N	N	N	N	N	N	N	N
50	N	N	N	N	N	N	N	N	N
51	N	N	N	N	N	N	N	N	N
52	N	N	N	N	N	N	N	N	N
53	N	N	N	N	N	N	N	N	N
54	N	N	N	N	N	N	N	N	N
55	N	N	N	N	N	N	N	N	N
56	N	N	N	N	N	N	N	N	N
57	N	N	N	N	N	N	N	N	N
58	N	N	N	N	N	N	N	N	N
59	N	N	N	N	N	N	N	N	N
60	N	N	N	N	N	N	N	N	N
61	N	N	N	N	N	N	N	N	N
62	N	N	N	N	N	N	N	N	N
63	N	N	N	N	N	N	N	N	N
64	N	N	N	N	N	N	N	N	N
65	N	N	N	N	N	N	N	N	N
66	N	N	N	N	N	N	N	N	N
67	N	N	N	N	N	N	N	N	N
68	N	N	N	N	N	N	N	N	N
69	N	N	N	N	N	N	N	N	N
70	N	N	N	N	N	N	N	N	N
71	N	N	N	N	N	N	N	N	N
72	N	N	N	N	N	N	N	N	N
73	N	N	N	N	N	N	N	N	N
74	N	N	N	N	N	N	N	N	N
75	N	N	N	N	N	N	N	N	N
76	N	N	N	N	N	N	N	N	N
77	N	N	N	N	N	N	N	N	N
78	N	N	N	N	N	N	N	N	N
79	N	N	N	N	N	N	N	N	N
80	N	N	N	N	N	N	N	N	N
81	N	N	N	N	N	N	N	N	N
82	N	N	N	N	N	N	N	N	N
83	N	N	N	N	N	N	N	N	N
84	N	N	N	N	N	N	N	N	N
85	N	N	N	N	N	N	N	N	N
86	N	N	N	N	N	N	N	N	N
87	N	N	N	N	N	N	N	N	N
88	N	N	N	N	N	N	N	N	N

N= No instance of noncompliance  
Y= Instance of noncompliance



**Summary Schedule B  
STUDENT DISBURSEMENTS  
Eastern International College  
Jersey City, NJ  
December 31, 2017**

	A	B	C	D	E	F	G	H
Student/ Number	Credited Student's account or paid student directly more than 10 days before the start of classes	Released funds to a student on LOA	First time borrower, released first payment before 30 days after the first day of classes	Made payment prior to student completing the previous payment period	Verification not complete within the period of time specified by the school, loan proceeds not returned promptly	Notification of crediting loan funds to student account not provided	Deficient entrance or exit counseling	Credit balance in student account not paid timely
1	N	N	N	N	N	N	N	N
2	N	N	N	N	N	N	N	N
3	N	N	N	N	N	N	N	N
4	N	N	N	N	N	N	N	N
5	N	N	N	N	N	N	N	N
6	N	N	N	N	N	N	N	N
7	N	N	N	N	N	N	N	N
8	N	N	N	N	N	N	N	N
9	N	N	N	N	N	N	N	N
10	N	N	N	N	N	N	N	N
11	N	N	N	N	N	N	N	N
12	N	N	N	N	N	N	N	N
13	N	N	N	N	N	N	N	N
14	N	N	N	N	N	N	N	N
15	N	N	N	N	N	N	N	N
16	N	N	N	N	N	N	N	N
17	N	N	N	N	N	N	N	N
18	N	N	N	N	N	N	N	N
19	N	N	N	N	N	N	N	N
20	N	N	N	N	N	N	N	N
21	N	N	N	N	N	N	N	N
22	N	N	N	N	N	N	N	N
23	N	N	N	N	N	N	N	N
24	N	N	N	N	N	N	N	N
25	N	N	N	N	N	N	N	N
26	N	N	N	N	N	N	N	N
27	N	N	N	N	N	N	N	N
28	N	N	N	N	N	N	N	N
29	N	N	N	N	N	N	N	N
30	N	N	N	N	N	N	N	N
31	N	N	N	N	N	N	N	N
32	N	N	N	N	N	N	N	N
33	N	N	N	N	N	N	N	N
34	N	N	N	N	N	N	N	N
35	N	N	N	N	N	N	N	N
36	N	N	N	N	N	N	N	N
37	N	N	N	N	N	N	N	N
38	N	N	N	N	N	N	N	N
39	N	N	N	N	N	N	N	N
40	N	N	N	N	N	N	N	N
41	N	N	N	N	N	N	N	N
42	N	N	N	N	N	N	N	N
43	N	N	N	N	N	N	N	N
44	N	N	N	N	N	N	N	N
45	N	N	N	N	N	N	N	N
46	N	N	N	N	N	N	N	N
47	N	N	N	N	N	N	N	N
48	N	N	N	N	N	N	N	N
49	N	N	N	N	N	N	N	N
50	N	N	N	N	N	N	N	N
51	N	N	N	N	N	N	N	N
52	N	N	N	N	N	N	N	N
53	N	N	N	N	N	N	N	N
54	N	N	N	N	N	N	N	N
55	N	N	N	N	N	N	N	N
56	N	N	N	N	N	N	N	N
57	N	N	N	N	N	N	N	N
58	N	N	N	N	N	N	N	N
59	N	N	N	N	N	N	N	N
60	N	N	N	N	N	N	N	N
61	N	N	N	N	N	N	N	N
62	N	N	N	N	N	N	N	N
63	N	N	N	N	N	N	N	N
64	N	N	N	N	N	N	N	N
65	N	N	N	N	N	N	N	N
66	N	N	N	N	N	N	N	N
67	N	N	N	N	N	N	N	N
68	N	N	N	N	N	N	N	N
69	N	N	N	N	N	N	N	N
70	N	N	N	N	N	N	N	N
71	N	N	N	N	N	N	N	N
72	N	N	N	N	N	N	N	N
73	N	N	N	N	N	N	N	N
74	N	N	N	N	N	N	N	N
75	N	N	N	N	N	N	N	N
76	N	N	N	N	N	N	N	N
77	N	N	N	N	N	N	N	N
78	N	N	N	N	N	N	N	N
79	N	N	N	N	N	N	N	N
80	N	N	N	N	N	N	N	N
81	N	N	N	N	N	N	N	N
82	N	N	N	N	N	N	N	N
83	N	N	N	N	N	N	N	N
84	N	N	N	N	N	N	N	N
85	N	N	N	N	N	N	N	N
86	N	N	N	N	N	N	N	N
87	N	N	N	N	N	N	N	N
88	N	N	N	N	N	N	N	N

N= No instance of noncompliance  
Y= Instance of noncompliance

