

**Office of Inspector General
Review of Foreign Influence**

Report # C-2324DOE-003

June 2024

Executive Summary

In accordance with the Department of Education’s fiscal year (FY) 2023-2024 audit plan, the Office of Inspector General (OIG) conducted a review of foreign gifts and foreign gift agreements reported by institutions of higher education (IHE) to the State Board of Education. Section 1010.25, Florida Statutes (F.S.), requires the Inspector General of the Department of Education (DOE) to annually inspect or audit at least 5 percent of the total number of gifts from a foreign source that were disclosed by, or gift agreements received from, institutions of higher education during the previous year.

The purpose of this audit was to determine the level of compliance with the statutory reporting requirements with respect to the sampled foreign gifts and gift agreements. In general, we determined the IHEs submitted their foreign gift reports timely, but we identified instances where some IHEs did not report certain gifts in full compliance with the statutory reporting requirements as noted in the audit results section of this report.

Scope, Objectives, and Methodology

The scope of our review included foreign gifts and foreign gift agreements reported by IHEs for the January 31, 2023, and July 31, 2023, reporting periods. The objective of this engagement was to determine if foreign gift disclosures are reported in compliance with the requirements outlined in section 1010.25, F.S. The engagement included a review of at least five percent of the total number of foreign gifts and foreign gift agreements totaling \$50,000 or more reported during the previous year. To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed appropriate staff; and reviewed a sample of foreign gifts reported to the State Board of Education and all related supporting documentation.

The methodology of our review included:

1. Selecting at least a five percent sample of gifts reported by institutions of higher education to determine if the gifts were reported in accordance with Section 1010.25, F.S., and
2. Reviewing all supporting documentation for the sample of foreign gifts and foreign gift agreements disclosed by IHEs to determine if the reported gifts contain the following reporting requirements in accordance with section 1010.25(3), F.S.:
 - a. The amount of the gift and the date it was received;
 - b. The contract start and end date if the gift is a contract;

- c. The name of the foreign source and, if not a foreign government, the country of citizenship, if known, and the country of principal residence or domicile of the foreign source; and
- d. A copy of the gift agreement between the foreign source and the institution of higher education, signed by the foreign source and the chief administrative officer of the institution of higher education or their respective designees. This gift agreement documentation must:
 - i. include a detailed description of the purpose for which the gift will be used;
 - ii. include the identification of the persons for whom the gift is explicitly intended to benefit; and
 - iii. include any applicable conditions, requirements, restrictions, or terms made a part of the gift regarding the control of curricula, faculty, student admissions, student fees, or contingencies placed upon the institution of higher education to take a specific public position or to award an honorary degree.

Background

The Florida Legislature passed House Bill 7017, related to foreign influence, during the 2021 Legislative Session. This act requires increased disclosure of foreign support for public entities; examination of vendors and grant applicants with foreign connections; and examination of foreign applicants for research positions, travel to foreign countries, and undertakings of employees working within research institutions. All provisions in House Bill 7017 took effect July 1, 2021.

This report relates specifically to section 1010.25, F.S., and only those foreign gifts reported by a Florida College System (FCS) institution, an independent nonprofit college or university that is located in and chartered by the state and grants baccalaureate or higher degrees, and any other institution that has a physical presence in the state and is required to report foreign gifts or contracts under federal law. Beginning July 1, 2022, section 1010.25(3)(d)(2.), F.S. requires the Inspector General of the Department of Education to annually inspect or audit at least five percent of the total number of gifts disclosed by or gift agreement received from the above noted institutions of higher education during the previous fiscal year.

All reporting IHEs must disclose information about the source, value, timing, purpose, and conditions or restrictions of their foreign gift(s). Section 1010.25, F.S., states the following pertinent definitions:

- Gift means any contract, gift, grant, endowment, award, or donation of money or property of any kind, or any combination thereof, including a conditional or an unconditional pledge of such contract, gift, grant, endowment, award, or donation; and
- Contract means any agreement for the acquisition by purchase, lease, or barter of property or services by the foreign source, for the direct benefit or use of either of the parties, and any purchase, lease, or barter of property or services from a foreign country of concern as defined in section 286.101(1)(b).

Institutions of higher education must report qualified foreign gifts two times each year. Foreign gifts received between July 1st and December 31st are reported by January 31st the following calendar year. Foreign gifts received between January 1st and June 30th are reported by July 31st of the same calendar year. Staff within the Division of Florida Colleges created and distributed a Foreign Gift & Donation Disclosure Form along with an instructional email memorandum stating what information shall be submitted at reporting deadlines to ensure compliance with the new statute. For the fiscal year 2022-2023, DOE received a total of 162 reported foreign gifts for a total value of \$192,532,823.23. One of the twenty-eight FCS institutions (Valencia College) and seven of the thirty Independent Colleges and Universities of Florida (ICUF) institutions (Eckerd College, Florida Institute of Technology, Nova Southeastern University, Embry-Riddle Aeronautical University, University of Tampa, University of Miami, and Beacon College) reported foreign gift disclosures. No Commission for Independent Education (CIE) institutions reported a qualifying foreign gift. The foreign gifts reported included contracts for goods and services, clinical research trials, awards, pledges, and student sponsorships.

Name of College	Reported Gifts for FY 2022-23	Total Value
Beacon College	1	\$ 150,000.00
Eckerd College	2	\$ 100,268.66
Embry-Riddle Aeronautical University	2	\$ 1,331,070.76
Florida Institute of Technology	100	\$ 18,759,244.12
Nova Southeastern University	6	\$ 2,505,687.44
The University of Tampa	4	\$ 1,066,053.00
University of Miami	46	\$ 168,566,588.65
Valencia College	1	\$ 53,910.60
TOTAL	162	\$ 192,532,823.23

Gifts from Foreign Countries of Concern

Section 286.101(1)(b) F.S., defines foreign countries of concern as, “the People’s Republic of China, the Russian Federation, the Islamic Republic of Iran, the Democratic People’s Republic of Korea, the Republic of Cuba, the Venezuelan regime of Nicolás Maduro, or the Syrian Arab Republic, including any agency of or any other entity under significant control of such foreign country of concern.”

Of the 162 gifts reported by IHEs for fiscal year 2022-2023, we identified six reported gifts from three foreign countries of concern. The Florida Institute of Technology received all six gifts, totaling \$345,165.10 , from the following foreign countries of concern: three from the People’s Republic of China amounting to \$182,753.76 , one from the Russian Federation totaling \$59,398.00, and two from the Venezuelan regime of Nicolás Maduro, totaling \$103,013.34. The disclosure forms for the six gifts from foreign countries of concern, as well as discussions with FIT, revealed that these six reported gifts comprised of individual student tuition payments from the student or the student’s family. FIT submitted three disclosure forms from the People’s Republic of China, one disclosure form from the Russian Federation, and two disclosure forms

from the Venezuelan regime of Nicolas Maduro. None of these six gift disclosure forms for student tuition payments were accompanied by any supporting documentation.

Audit Results

We reviewed 10 of 162 (6%) foreign gifts and foreign gift agreements totaling \$50,000 or more to determine if the gift disclosures complied with section 1010.25(3) F.S. Specifically, section 1010.25(3)(a-c) requires the IHEs to provide the amount of the gift and the date it was received, the contract start and end date if the gift is a contract, and the name of the foreign source and, if not a foreign government, the country of citizenship, if known, and the country of principal residence or domicile of the foreign source. Our review of the ten sampled foreign gift disclosures determined that all ten gifts reviewed complied with the reporting requirements.

Section 1010.25(3)(d) additionally requires the IHEs to include a “copy of a gift agreement between the foreign source and the institution of higher education, signed by the foreign source and the chief administrative officer of the institution of higher education, or their respective designees, which must include a detailed description of the purpose for which the gift will be used by the institution of higher education, the identification of the persons for whom the gift is explicitly intended to benefit, and any applicable conditions, requirements, restrictions, or terms made a part of the gift regarding the control of curricula, faculty, student admissions, student fees, or contingencies placed upon the institution of higher education to take a specific public position or to award an honorary degree.”

Our initial review determined seven of the eight IHEs included in our sample submitted copies of the gift agreements at the time they reported the foreign gifts. However, only one of the eight gift agreements submitted by those seven IHEs contained all of the statutorily required information. The other seven gift agreements were missing signatures by either the foreign source or the respective college designee (5), contained an incomplete copy of the gift agreement (1), or failed to identify the beneficiaries of the gift (2)¹. The Florida Institute of Technology submitted the one fully compliant gift agreement at the initial submission. The University of Miami reported two of the ten foreign gifts included in our sample but did not initially submit a copy of the gift agreement².

During the course of the review, the OIG contacted the IHEs and requested copies of the agreements demonstrating all information required in statute that was not included in the initial submissions. The IHEs subsequently provided updated copies of the gift agreements and additional documentation.

Upon reviewing the additional documents from the IHE's to support the nine sample gift submissions that partially met the statutory requirements at the time of the initial submission, five of the nine gifts became fully compliant with the statutory requirements. Four of the ten

¹ Beacon College's initial submission was missing both a signature by the chief administrative officer or respective designee and identification of the person for whom the gift is explicitly intended to benefit.

² The University of Miami provided evidence of multiple attempts to submit the documentation, but they could not provide evidence of a successful submission.

gifts remained partially compliant due to missing signatures by the college administrator or respective designee or by the foreign source.

- Gifts from Beacon College and Valencia College were partially compliant for not providing a signature from the chief administrative officer or their respective designee due to college practice and procedures.
- One Florida Institute of Technology gift agreement remained partially compliant for not providing a signature from the chief administrative officer or their respective designee; however; FIT indicated that a change in process should ensure compliance going forward.
- The University of Tampa remained partially compliant for providing sporadic signatures by the foreign source and no signatures by the chief administrative officer or their respective designee.

The table below shows the breakdown of compliance by IHE:

Name of IHE	Gifts Reviewed	Partially Compliant During Initial Submission	Fully Compliant Documentation Submitted During Audit
Eckerd College	1	1	Yes
Florida Institute of Technology	2	1	No
Nova Southeastern University	1	1	Yes
The University of Tampa	1	1	No
University of Miami	2	2	Yes
Beacon College	1	1	No
Valencia College	1	1	No
Embry- Riddle Aeronautical University	1	1	Yes

Management Responses

Five of the eight IHEs listed above provided a response to the report findings. Please see attached management response letters from Embry Riddle Aeronautical University (Attachment A), Beacon College (Attachment B), University of Miami (Attachment C), Valencia College (Attachment D), and Florida Institute of Technology (Attachment E). Three of the respondents generally concurred with the findings and stated that they would make the requisite policy and procedural changes to reach full compliance. The Florida Institute of Technology provided additional clarification for two gifts from a foreign country of concern in the form of contracts with China Airlines to provide flight training services to students of the China Airlines Pilot Training Program. FIT originally identified the two contracts were from “China” on the disclosure form, but clarified that the contracts were with the Republic of China (Taiwan) in their response to the draft report. After further review, we removed those two gifts from the foreign countries of concern section. FIT further asserted that the remaining gifts from foreign countries of concern were student families paying tuition and fees for their individual student as explained in the report. Finally, the University of Miami asserted that they fully complied with reporting requirements upon their initial submission and challenged the assessment that they partially complied. After reviewing the additional evidence submitted by UM, the OIG stands by the

assessment of partial compliance. As pointed out in the report, UM provided evidence that they attempted to deliver the disclosure forms and supporting documentation, but the only submission that successfully reached the department did not contain the requisite supporting documentation.

Closing Comments

The Office of the Inspector General would like to recognize and acknowledge the offices and staff of the Division of Florida Colleges and the respective institutions for their assistance during this review. Our fieldwork was facilitated by the cooperation and assistance extended by all personnel involved.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of section 20.055, F.S., and in accordance with the International Standards for the Professional Practice of Internal Auditing, published by the Institute of Internal Auditors, and Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The audit was conducted by Ayah Mahdy and supervised by Bradley Rich, Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at <https://www.fldoe.org/about-us/office-of-the-inspector-general/audit-reporting-products.shtml>. Copies may also be requested by telephone at 850-245- 0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General, 325 West Gaines Street, Suite 1201, Tallahassee, FL 32399.

EMBRY-RIDDLE Aeronautical University

Office of the Senior Vice President and Chief Financial Officer

Randall B. Howard, Ph.D.

May 28, 2024

Mr. Bradley Rich, MS
Audit Director
Office of the Inspector General
325 West Gaines Street, Suite 1201
Tallahassee, Florida 32399
Office: 850-245-0403
Direct: 850-245-9221

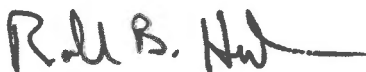
RE: Report # C-2324DOE-003 – Embry-Riddle Aeronautical University

Embry-Riddle Aeronautical University concurs with the Florida Department of Education, Office of Inspector General's finding that, for the fiscal year 2022-2023, Embry-Riddle's submission of foreign gifts and foreign gift agreements reported to the State Board of Education contained an incomplete copy of an agreement. A complete copy of the referenced agreement was subsequently submitted to the Office of Inspector General during the annual audit.

Embry-Riddle is taking immediate corrective measures to ensure compliance in the future including an additional review of the documentation (ensuring that all pages have been received, including any attachments or exhibits) and ensuring that the contract provisions and pages are sequentially numbered.

Thank you for your thorough review and feedback. Embry-Riddle values your work in ensuring compliance and accountability.

Sincerely,



Randall B. Howard
Senior Vice President and Chief Financial Officer





June 18, 2024

Mr. Bradley Rich, MS
Audit Director
Florida Department of Education
Office of the Inspector General
325 West Gaines Street
Suite 1201
Tallahassee, FL 32399

Dear Mr. Rich,

Thank you for providing a copy of the draft report from your office's review of foreign gifts and donations in relation to the requirements of Section 1010.25, Florida Statutes.

Beacon College appreciates the communication and professionalism exhibited by your office during this process.

This correspondence acts on your invitation outlined in your May 22nd email for any colleges or universities looking to share some context and response on the report.

The report cited that "Beacon College's initial submission was missing both a signature by the chief administrative officer or respective designee and identification of the person for whom the gift is explicitly intended to benefit."

A copy of Beacon College's gift agreement and pledge form – for the donation made on September 9, 2023 – was provided to DOE as part of Beacon's Foreign Gift & Donation Disclosure form dated January 27, 2023. The donor signed the pledge form and made the gift to Beacon specifying that the gift was for scholarship support for Beacon students. A copy of the gift arrangement – outlining a completed checklist of donor intent for the implementation of the scholarship support -- requested that students (a.k.a, persons) to receive these awards were to be chosen solely and specifically by the college's administration.

Given that the gift was made nearly a month into the conduct of the Fall 2022 semester, the Beacon administration decided to begin the full implementation of the scholarship program at the start of the next academic year – commencing in Fall 2023. It is customary for Beacon to start a new scholarship program at the beginning of an academic year and carry it forth, cyclically, on academic year-by-year basis.

The actual identify of the students (a.k.a., persons) receiving the actual scholarship support was not fully determined until July 2023; at the conclusion of the full enrollment of new, existing and transfer students – and, at the conclusion of a full assessment of financial need for those students.

Because these actions were determined during that timeframe, the identity of the students selected for scholarship support – that resulted, specifically, from this gift – was unknown on January 27, 2023, the date of submission of the Beacon’s Foreign Gift & Donation Disclosure form.

Given that the identity of the students were not known until some six months after the deadline for submission, Beacon was unable to provide that information on that January date.

In regards to the absence of a signature of an officer of the college on the donor’s commitment form: that is the direct result of Beacon’s practice that a donor’s commitment form is not a contract with the institution. It is our college’s practice that only the donor(s) signatures are required for a pledge form – for the donor’s signature on the document outlines the honorable intent of the donor(s) to promise to make payments towards such a gift to our institution. Our pledges are not legally binding.

The college’s acceptance and implementation of these gifts is defined by our commitment carried forth through the stewardship of that gift with the donor. This can be felt through meetings, visits, and any follow-on communications and reporting with the donor. This is done to ensure both the securement of payment from the donor and to demonstrate the institution’s fidelity to the proper implementation of donor intent.

After reviewing the draft report provided, Beacon has decided to alter our policy on gift agreements as they relate to foreign gifts. From this point on, Beacon College’s chief development officer (which I am currently serving as Vice President of Advancement and Strategy) will affix their signature – on a Beacon College gift agreement or pledge form -- alongside the signature of an individual of a foreign source who has made gift(s) and/or a gift agreement(s) totaling \$50,000 or more.

Once again, please accept our gratitude for the conduct of this process and for the opportunity to provide this information.

If you have any further questions, please do not hesitate to reach out to me at (352) 638-9801 or rkillion@beaconcollege.edu.

With appreciation and best wishes to you for a wonderful Summer,

Sincerely,



Richard J. Killion
Vice President for Advancement & Strategy

Rich, Bradley

From: Perez, Nelson Edward Sr. <nelsonperez@miami.edu>
Sent: Monday, June 10, 2024 10:28 AM
To: Rich, Bradley
Subject: RE: OIG Draft Report of Preliminary and Tentative Issues - Review of Foreign Influence
Attachments: Draft Report_Review of Foreign Influence_FL DoE_OIG.docx

Dear Bradley Rich, Audit Director, Office of the Inspector General:

The University of Miami would like to submit a response to the OIG Draft Report of Preliminary and Tentative Issues - Review of Foreign Influence Report attached.

*[I will be sending you via Box a folder with the 7 emails discussed below – You will need to download each file and then open it with Outlook. If you have any issues, please let me know.]

RESPONSE:

We believe the University of Miami has complied with the requirements outlined in section 1010.25, F.S. Therefore, we feel that the report should not indicate that the University of Miami was partially compliant during initial submission, but instead fully compliant during initial submission.

For the January 31, 2023 Foreign Gifts and Contracts submission (July 1, 2022 to December 31, 2022), the University compiled all necessary data and documentation to submit to the FL DoE. Numerous attempts were made to transmit the information to the FL DoE, specifically to an employee by the name of Christopher Brown (see attached pdfs of the emails communication with Mr. Brown). Mr. Brown insisted on sending the information via email although it was conveyed to him that the file may be too large to send. At no time did he offer any other means by which to transmit the information.

In all, there were approximately seven attempts to transmit the information. Mr. Brown ultimately responded with an acknowledgement of receipt of the submission. It was assumed that he had received all required information since there was no indication relayed to us to the contrary.

Regards,

Nelson E. Perez, JD, CCEP
Executive Director
Office of University Compliance Services
University of Miami
Phone: (305) 284-2924
Cell: (786) 390-0510
Email: nelsonperez@miami.edu



Office of the Inspector General Report # C-2324DOE-003 May 2024
Response Date: June 19, 2024

Finding

Gifts were partially compliant for not providing a signature from the chief administrative officer of their respective designee due to college practice and procedures.

Background

In accordance with Florida Statute 1010.25, a gift is defined as any contract, including a financial guarantee (sponsorship) of tuition and fees by a foreign government on behalf of a student enrolled in standard courses, which must be signed by representatives of both the foreign government and the institution of higher education.

Valencia College's current practice for third-party sponsorships is to approve agencies listed on the Authorized Third-Party Sponsors Report (ATPSR) which is signed by an authorized college designee. If the College receives a financial guarantee agreement for a specific student from a third-party agency on the ATPSR, this individual agreement is not counter signed since Valencia has already agreed to accept the written promise to pay under State Board of Education Rule 6A-14.054(10). As a result of current practice, there is not a single document of the financial guarantee signed by both the foreign government and a Valencia College representative.

Planned Corrective Action

Valencia College recognizes that financial agreements with foreign governments need to incorporate college administrator or designee signature on the financial agreement in compliance with F.S. 1010.25. A procedure has been adopted to require a college administrator signature on all foreign government third-party student sponsorship financial contracts.

Completion Date

April 12, 2024

Responsible Contact Person

Jackie Lasch, Assistant Vice President Financial Services



June 16, 2024

Bradley Rich, MS
Audit Director
Office of the Inspector General
325 West Gaines Street, Suite 1201
Tallahassee FL 32399

Re: OIG Review of Foreign Influence Report # C-2224DOE-003, May 2024

The Florida Institute of Technology (FIT) does not accept cash or cash like gifts from foreign governments or their agents and adheres to all regulations pertaining to institutional research and tech transfer activities (i.e., ITAR). FLORIDA TECH follows legal guidance for reporting requirements in federal law (as defined in 20 U.S.C. § 1011f administered by the U.S. Department of Education).

The Florida Institute of Technology respectfully submits these comments in regard to the aforementioned audit report. Section 1010.25, F.S. requires universities to report contracts over \$50,000. We note that there are differing interpretations regarding the reportability of tuition and fees paid by a student from personal or family resources. In an effort to provide as much clarity as possible, FLORIDA TECH interpreted this broadly and reported these payments. We request that the OIG not penalize the University for providing information over and above what may have been provided by other institutions. Six of the eight exceptions noted by the OIG relate to information involving these tuition and fee payments. FLORIDA TECH takes the responsibility for reporting foreign gifts grants and contracts extremely seriously and we humbly submit the following for the OIG's consideration:

Florida law recognizes the relationship between students and universities as contractual and that the terms of the University are the contract. In *Jallali v. Nova Southeastern University, Inc.* 992 So. 2d at 342 (4th Cir. 2008), the Court stated that a "student's relationship with university is based in contract arising from university's rules, regulations, regimen and publications at the time of enrollment."

The University does not have a standard contract that students sign. The courts have recognized that the service contract between students and Universities does not have a normal form. However, they have recognized that the policies and handbooks of a University contractually obligate the parties. Recently, in *re Univ. of Miami COVID-19 Tuition & Fee Refund Litig.*, 524 F. Supp. 3d 1346 (S.D. Fla. 2022), the Court stated:

*It is well-settled in Florida that "the terms of the relationship between a student and a university may be found in university catalogs, student manuals, student handbooks, and other university policies and procedures." (Quoting Rosado v. Barry University Inc., — F.Supp.3d —, —, 2020 WL 6438684, at *3 (S.D. Fla. Oct. 30, 2020)).*

In accordance with the ruling of the Court, the University provides a link to our student handbook and University policies below:

<https://www.FIT.edu/policies/student-focused-policies/student-handbook/>

The time period of the contract can be found in the University Academic Calendar from August 2022-July 2023. The calendar can be found at this link:

<https://catalog.FIT.edu/content.php?catoid=14&navoid=676>



The student handbook and the policies of the University are the terms of the contract for tuition and fees. The University wishes to be completely responsive to the OIG. Please let us know if there is any other term or proof of contract. However, according to caselaw, the student handbook should be evidence of the terms of the contract and provide the supporting documentation noted in the OIG's finding.

Specific Exceptions from the Draft OIG Report:

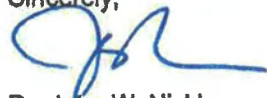
Exceptions Noted: *"Of the 162 gifts reported by IHEs for the fiscal year 2022-2023, we identified eight reported gifts from three foreign countries of concern. The Florida Institute of Technology received all eight gifts, totaling \$1,901,229.81, from the following countries of concern: five from the People's Republic of China amounting to \$1,738,818.47, one from the Russian Federation totaling \$59,398.00 and two from the Venezuelan regime of Nicolas Maduro, totaling \$103,013.34. Two of the gifts FLORIDA TECH disclosed from the People's Republic of China were contracts with China Airlines to provide flight training services to students of the China Airlines Pilot Training Program. These contracts included all required supporting documentation which showed that FLORIDA TECH entered into the contracts before the law was enacted. Both contracts ended December 31, 2023. The disclosure forms for the remaining six gifts from foreign countries of concern as well as discussions with FLORIDA TECH, revealed that these six reported gifts comprised of individual student tuition payments from the student or the student's family. FLORIDA TECH submitted three disclosure forms from the People's Republic of China, one disclosure form from the Russian Federation, and two disclosure forms from the Venezuelan regime of Nicolas Maduro. None of these six gift disclosure forms for student tuition payments were accompanied by any supporting documentation."*

Response:

1. China Airlines is headquartered in and organized under the laws of Taiwan – Republic of China not the People's Republic of China. Their address is No. 1, Hangzhan S. Rd, Dayuan Dist, Taoyuan City, 33758, Taiwan, R.O.C. as disclosed in submitted documents. Section 286.101, F.S. lists the People's Republic of China as a "foreign country of concern" but does not list Taiwan – Republic of China. Florida Senate Resolution SR 944 passed in 2023 was "A resolution expressing appreciation for the sister state relationship and bilateral economic and cultural ties between the State of Florida and Taiwan." As such, FLORIDA TECH believes that the payments received from China Airlines for the Pilot Training Program, \$ 1,021,404.93 in the audit period, should not be characterized as originating from a "foreign country of concern".
2. The remaining six disclosure forms provided involve individual students from the noted countries making tuition and fee payments from personal or family resources. Please accept the linked electronic copy of our academic year and our student handbook as the contract terms and dates for our students and fulfilling the supporting documentation exception as noted above.

Thank you again for the opportunity to respond to the OIG draft audit. The Florida Institute of Technology is committed to transparent and open reporting in all matters.

Sincerely,



Dr. John W. Nicklow
President and CEO
Florida Institute of Technology