

**WESTERN KENTUCKY UNIVERSITY
INTERCOLLEGIATE ATHLETICS DEPARTMENT**

**INDEPENDENT ACCOUNTANT'S REPORT ON
APPLYING AGREED-UPON PROCEDURES**

June 30, 2021

WESTERN KENTUCKY UNIVERSITY
INTERCOLLEGIATE ATHLETICS DEPARTMENT
Bowling Green, Kentucky

AGREED UPON PROCEDURES
REQUIRED BY THE NCAA
June 30, 2021

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INDEPENDENT ACCOUNTANT'S REPORT ON
APPLYING AGREED-UPON PROCEDURES

Dr. Timothy Caboni, President
Western Kentucky University
Bowling Green, Kentucky

We have performed the procedures included in Attachment A, which were agreed to by the President of Western Kentucky University ("the University"), and the National Collegiate Athletic Association ("NCAA") solely to assist the specified parties in evaluating the University's compliance with the NCAA Constitution Article 3.2.4.17 during the year ended June 30, 2021. The University's management is responsible for the Schedule of Revenue and Expenses of intercollegiate athletics operations ("Schedule") and the Schedule's compliance with those requirements.

Western Kentucky University has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of evaluating the University's compliance with the NCAA Constitution Article 3.2.4.17 during the year ended June 30, 2021. We make no representation regarding the appropriateness of the procedures either for the purpose for which this report has been requested or for any other purpose. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. An agreed-upon procedures engagement involves performing specific procedures that the engaging party has agreed to and acknowledged to be appropriate for the intended purpose of the engagement and reporting on findings based on the procedures performed.

The procedures and the associated findings are contained in Attachment A.

We were engaged by Western Kentucky University to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the compliance of the accompanying Schedule of Revenue and Expenses of Western Kentucky University intercollegiate athletic programs with the NCAA Constitution Article 3.2.4.17. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Western Kentucky University and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the President of Western Kentucky University and the NCAA and is not intended to be and should not be used by anyone other than these specified parties.


Crowe LLP

Louisville, Kentucky
January 13, 2022

WESTERN KENTUCKY UNIVERSITY
INTERCOLLEGIATE ATHLETICS DEPARTMENT
SCHEDULE OF REVENUE AND EXPENSES
For the Year Ended June 30, 2021
(Unaudited)

ID	Item	Football	Men's Basketball	Women's Basketball	Other Sports	Non- Program Specific	Total
Summary of Revenues:							
1	Ticket sales	\$ 350,474	\$ 363,825	\$ 58,409	\$ 13,354	\$ 31,910	\$ 817,972
2	Direct state or other government support	-	-	-	-	-	-
3	Student fees	-	-	-	-	3,454,458	3,454,458
4	Direct institutional support	4,841,427	2,214,542	1,034,453	4,902,597	-	12,993,019
5	Less – transfers to institution	-	-	-	-	(2,952,681)	(2,952,681)
6	Indirect institutional support	-	-	-	-	4,620,715	4,620,715
7	Guarantees	2,325,000	70,000	15,000	500	-	2,410,500
8	Contributions	905,758	214,814	113,610	130,465	2,043,364	3,408,011
9	In-kind	-	-	-	-	-	-
10	Compensation and benefits provided by a third party	10,244	8,332	4,429	13,019	27,375	63,399
11	Media rights	-	-	-	-	-	-
12	NCAA distributions	-	30,500	-	44,700	368,376	443,576
13	Conference distributions (non-media or bowl)	-	-	-	-	1,747,300	1,747,300
14	Program, novelty, parking and concession sales	-	-	-	-	220,796	220,796
15	Royalties, licensing, advertisement and sponsorships	-	-	-	-	963,511	963,511
16	Sports camp revenues	45,465	206	39,822	88,230	-	173,723
17	Athletics restricted endowment and investments income	38,950	36,950	35,100	18,750	-	129,750
18	Other operating revenue	9,640	-	-	30,978	53,313	93,931
19	Bowl revenues	278,043	-	-	-	-	278,043
	Subtotal operating revenues	<u>8,805,001</u>	<u>2,939,169</u>	<u>1,300,823</u>	<u>5,242,593</u>	<u>10,578,437</u>	<u>28,866,023</u>

Prepared by Management of Western Kentucky University
(Continued)

WESTERN KENTUCKY UNIVERSITY
INTERCOLLEGIATE ATHLETICS DEPARTMENT
SCHEDULE OF REVENUE AND EXPENSES
For the Year Ended June 30, 2021
(Unaudited)

ID	Item	Football	Men's Basketball	Women's Basketball	Other Sports	Non- Program Specific	Total
Summary of Expenses:							
20	Athletic student aid	\$ 2,906,300	\$ 474,597	\$ 452,797	\$ 2,382,786	\$ 107,887	\$ 6,324,367
21	Guarantees	425,000	132,390	-	15,728	-	573,118
22	Coaching salaries, benefits, and bonuses paid by the University and related entities	2,168,467	1,305,245	456,999	1,542,483	-	5,473,194
23	Coaching other compensation and benefits paid by a third-party	8,133	8,332	4,429	13,019	-	33,913
24	Support staff/administrative salaries, benefits and bonuses paid by the University and related entities	836,998	168,408	54,721	99,097	3,073,487	4,232,711
25	Support staff/administrative other compensation and benefits paid by a third-party	2,111	-	-	-	27,375	29,486
26	Severance payments	-	-	-	-	-	-
27	Recruiting	14,758	7,647	155	26,471	-	49,031
28	Team travel	714,288	529,968	147,431	531,426	-	1,923,113
29	Sports equipment, uniforms and supplies	414,550	30,162	21,541	242,249	-	708,502
30	Game expenses	345,965	90,204	57,064	135,405	513,264	1,141,902
31	Fund raising, marketing and promotion	35,366	79,684	16,313	83,330	628,874	843,567
32	Sports camp expenses	45,140	-	29,565	11,497	-	86,202
33	Spirit groups	-	-	-	-	120,751	120,751
34	Athletic facilities debt service, leases and rental fees	-	-	-	-	3,060,913	3,060,913
35	Direct overhead and administrative expenses	-	-	-	-	-	-
36	Indirect institutional support	-	-	-	-	1,559,802	1,559,802
37	Medical expenses and medical insurance expenses	51	294	43	700	540,655	541,743
38	Memberships and dues	1,303	-	-	2,674	4,269	8,246
39	Student-athlete meals (non-travel)	287,264	62,551	20,912	57,124	7,264	435,115
40	Other operating expenses	275,895	49,687	38,853	98,604	933,896	1,396,935
41	Bowl expenses	323,412	-	-	-	-	323,412
	Total operating expenses	<u>8,805,001</u>	<u>2,939,169</u>	<u>1,300,823</u>	<u>5,242,593</u>	<u>10,578,437</u>	<u>28,866,023</u>
	Excess (deficiency) of revenues over (under) expenses	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>

Prepared by Management of Western Kentucky University

NOTE 1 – CONTRIBUTIONS FROM THE WESTERN KENTUCKY UNIVERSITY FOUNDATIONS

The Western Kentucky University Foundation receives gifts and contributions that are restricted for the related athletics programs. The Hilltopper Athletic Foundation (“HAF”) raises funds for the intercollegiate athletics program and transfers them to the University when needed. The Western Kentucky University Foundation holds accounts for the Touchdown Club and Men’s Basketball Athletic Director Fund. All athletics related revenues and expenses from the WKU Foundation, HAF and College Heights Foundation are included in the Schedule of Revenues and Expenses.

NOTE 2 – CAPITAL ASSETS

Assets acquired, depreciated and disposed of for athletic purposes follow the University’s capitalization policy of \$5,000. All capital assets, as defined by University policy, are recorded at cost at the date of acquisition, or, if donated, at fair value at the date of donation. Depreciation is computed using the straight-line method over the estimated useful life of the asset and is not allocated to functional expense categories. Assets capitalized under leases are amortized over the estimated useful life of the asset, or the lease term, whichever is shorter. Routine repairs and maintenance are charged to operating expense in the year in which the expense was incurred.

NOTE 3 – LONG TERM DEBT

For the year ended June 30, 2021, there was outstanding intercollegiate athletics debt associated with a portion of the General Receipts Bonds, Series 2015A and Series 2016A, totaling \$12,657,212. Additionally, there is outstanding intercollegiate athletics debt related to the renovation of Diddle Arena and maintained by the University totaling \$12,840,000.

Future payment requirements for the Diddle Arena outstanding debt as of June 30, 2021 are as follows:

<u>Year ending June 30</u>	<u>Principal</u>	<u>Interest</u>
2022	2,525,000	480,705
2023	2,415,000	392,330
2024	2,520,000	302,975
2025	2,625,000	208,475
2026	<u>2,755,000</u>	<u>106,756</u>
	<u>\$ 12,840,000</u>	<u>\$ 1,491,241</u>

NOTE 4 – OTHER REPORTING ITEMS

Certain other reporting items are required to be included within the notes to schedule of revenues and expenses. Below are the amounts and balances as of and for the fiscal year ending June 30, 2021:

Excess Transfers to Institution	\$ -
Conference Realignment Expenses	-
Total Athletics Related Debt	25,497,212
Total Institutional Debt	132,193,781
Value of Athletics Dedicated Endowments	16,145,148
Value of Institutional Endowments	214,598,585
Total Athletics Related Capital Expenditures	24,620

WESTERN KENTUCKY UNIVERSITY
NCAA AUP REVENUE AND EXPENSE PROCEDURES
JUNE 30, 2021
Attachment A

If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Procedures

Revenue Procedures

1. Before the commencement of fieldwork, determine that the amounts reported on the Schedule agree to the institution's general ledger. Recalculate totals.

Results: No exceptions noted.

2. Compare and agree each operating revenue category reported in the Schedule during the reporting period to supporting schedules provided by the institution.

Results: No exceptions noted.

3. Compare and agree a haphazard sample of operating revenue receipts obtained from the above operating revenue supporting schedules to adequate supporting documentation (such as payment receipts, posting general and daily balancing report).

Results: We performed specific revenue procedures detailed below for all categories that were equal to or greater than 4% of total revenues. No other category exceeded this threshold, therefore, the procedures enumerated above are not applicable.

4. Compare each major revenue account over 10% of the total revenues to prior period amounts and budget estimates. Obtain and document an explanation of any significant variations over 10% from the prior year. Report the analysis as a supplement to the final agreed upon procedures report.

Results: There was one revenue category on the Schedule of Revenues and Expenses that were greater than 10% of total revenues and had a variance greater than 10% from prior year balances.

- Indirect Institutional Support increased \$873,810 or 23.3% from the prior year. Per inquiry of management, during FY 21 additional indirect institutional support was needed to cover the cost of a roof replacement project for Diddle Arena that was started in May 2021.
- Transfers to Institution increase \$1,189,533 or 67.5% from the prior year. Per inquiry of management, Transfers to the Institution reporting category is used to net to the overall amount of institutional support provided to athletics. The netting process requires transfers to be reported as a negative figure, while also grossing up the Direct Institutional Support reporting category required when the various teams and operating areas do not generating enough revenue to balance within their specific area being reported. In combination with the change in Direct Institutional Support, the net direct institutional support decreased by \$2,301,373, which was primarily the result of reduced spending.
- Contributions increased \$700,343 or 25.9% from the prior year. Per inquiry of management, increase is a result of several factors. The primary is the transfer amount required from the Hilltopper Athletic Foundation increased from \$950,000 to \$1,350,000 in FY21. The remaining increase is not isolated to one specific action or fund. With the COVID pandemic in full force during FY21, overall athletic generated revenues were down and as a result of decreased revenue opportunities, the athletic department sought private funding where possible. A portion of remaining increase is from additional donations, as well as interest earned from investments of the foundation funds.

WESTERN KENTUCKY UNIVERSITY
NCAA AUP REVENUE AND EXPENSE PROCEDURES
JUNE 30, 2021
Attachment A

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Ticket Sales

5. Compare tickets sold during the reporting period, complimentary tickets provided during the reporting period and unsold tickets to the related revenue reported by the Institution in the Schedule and the related attendance figures and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Student Fees

6. Compare and agree student fees reported by the institution in the Schedule for the reporting period to the student enrollment report obtained from the Registrar during the same reporting period and recalculate totals.

Results: No exceptions noted.

7. Obtain documentation of institution's methodology for allocating student fees to intercollegiate athletics programs.

Results: No exceptions noted.

8. If the athletics department is reporting that an allocation of student fees should be countable as generated revenue, recalculate their calculation for supporting that they are able to count each sport. Tie the calculation to supporting documents such as seat manifests, ticket sales reports and student fee totals.

Results: No exceptions noted.

Direct State or Other Governmental Support

9. Compare direct state or other governmental support recorded by the institution during the reporting period with state appropriations, institutional authorizations or other corroborative supporting documentation and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Direct Institutional Support

10. Compare the direct institutional support recorded by the institution during the reporting period with the institutional supporting budget transfers documentation and other corroborative supporting documentation and recalculate totals.

Results: No exceptions noted.

Transfers Back to Institution

11. Compare the transfers back to institution with permanent transfers back to institution from the athletics department with recalculated totals.

Results: No exceptions noted.

Indirect Institutional Support

12. Compare the indirect institutional support recorded by the institution during the reporting period with expense payments, cost allocation detail and other corroborative supporting documentation and recalculate totals.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Results: We noted an immaterial \$7,292 difference of indirect institutional support between supporting documentation and the schedule of revenue and expense. We inquired with management and were informed this difference relates to an adjustment for the accrual of interest as a result of when the interest was paid and when it was collected.

Guarantees

13. Select a haphazard sample of 5 (or all if fewer than 5) settlement reports for away games during the reporting period and agree each selection to the institution's general ledger and the schedule and recalculate totals.

Results: No exceptions noted.

14. Select a haphazard sample of 5 (or all if fewer than 5) contractual agreements pertaining to revenues derived from guaranteed contests during the reporting period and compare and agree each selection to the institution's general ledger and the schedule and recalculate totals.

Results: No exceptions noted.

Contributions

15. Obtain and agree supporting documentation for any contributions of money, goods or services received directly by an intercollegiate athletics program from any affiliated or outside organization, agency or group of individuals (two or more) not included above (e.g., contributions by corporate sponsors) that constitutes 10% or more of all contributions received for intercollegiate athletics during the reporting period and recalculate totals.

Results: No exceptions noted.

In-Kind

16. Compare the in-kind recorded by the institution during the reporting period with a schedule of in-kind donations and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Compensation and Benefits Provided by a Third-Party

17. Obtain the summary of revenues from affiliated and outside organizations (the "Summary") as of the end of the reporting period from the institution and select a haphazard sample of funds representing at least 20% of the compensation and benefits revenues from the Summary and compare and agree each selection to supporting documentation (such as a report from the third-party), the institution's general ledger, and the Summary and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Media Rights

18. Obtain and inspect agreements to understand the institution's total media (broadcast, television, radio) rights received by the institution or through their conference offices as reported in the Schedule.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

WESTERN KENTUCKY UNIVERSITY
NCAA AUP REVENUE AND EXPENSE PROCEDURES
JUNE 30, 2021
Attachment A

If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

19. Compare and agree the media right revenues recorded to a summary Schedule of all media rights identified, if applicable, and the institution's general ledger and recalculate totals. Ledger totals may be different for total conference distributions if media rights are not broken out separately.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

NCAA Distributions

20. Compare the amounts recorded in the revenue and expense reporting to general ledger detail for NCAA distributions and other corroborative supporting documents (i.e., check copy, agreement) and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Conference Distributions

21. Obtain and inspect all agreements related to the institution's conference distributions and participation in revenues from tournaments during the reporting period for relevant terms and conditions.

Results: No exceptions noted.

22. Compare and agree the related revenues to the institution's general ledger and the Schedule and recalculate totals.

Results: No exceptions noted.

Program Sales, Concessions, Novelty Sales and Parking

23. Compare the amount recorded in the revenue reporting category to a general ledger detail of program sales, concessions, novelty sales and parking as well as any other corroborative supporting documents (i.e., check copy, agreement) and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Royalties, Licensing, Advertisements and Sponsorships

24. Obtain and inspect all agreements related to the institution's participation in revenues from royalties, advertisements and sponsorships during the reporting period for the relevant terms and conditions.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

25. Compare and agree the related revenues to the institution's general ledger and the Schedule and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Sports Camp Revenues

26. Inspect sports-camp contract(s) between the institution and person(s) conducting institutional sports-camps or clinics during the reporting period to obtain documentation of the institution's methodology for recording revenues from sports-camps.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

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NCAA AUP REVENUE AND EXPENSE PROCEDURES
JUNE 30, 2021
Attachment A

If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

27. Obtain schedules of camp participants and select a haphazard sample of individual camp participant cash receipts from the schedule of sports-camp participants and agree each selection to the institution's general ledger and/or the Schedule and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Athletics Restricted Endowment and Investment Income

28. Obtain and inspect all endowment agreements (if any) for relevant terms and conditions.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

29. Compare and agree the classification and use of endowment and investment income reported in the Schedule during the reporting period to the uses of income defined within the related endowment agreement and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

Other Operating Revenue

30. Perform minimum agreed-upon procedures referenced for all revenue categories (see above under revenue procedures, points 1-3) and recalculate totals.

Results: We performed specific revenue procedures detailed above for all categories that were equal to or greater than 4% of total revenues. No other category exceeded this threshold, therefore, the procedures enumerated above are not applicable.

Bowl Revenues

31. Obtain and inspect all agreements related to the institution's revenues from post-season bowl participation during the reporting period to gain an understanding of the relevant terms and conditions.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

32. Compare and agree the related revenues to the institution's general ledger and Schedule and recalculate totals.

Results: This category was less than 4% of the total revenue. Therefore, the procedures enumerated above were not applicable.

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WESTERN KENTUCKY UNIVERSITY
NCAA AUP REVENUE AND EXPENSE PROCEDURES
JUNE 30, 2021
Attachment A

If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Expense Procedures

1. Before the commencement of fieldwork, determine that the amounts reported on the Schedule agree to the institution's general ledger. Recalculate totals.

Results: No exceptions noted.

2. Compare and agree each operating expense category reported in the Schedule during the reporting period to supporting schedules provided by the institution.

Results: No exceptions noted.

3. Compare and agree a haphazard sample of 5 operating expenses (or all if the population is less than 5) obtained from the above operating expense supporting schedules to adequate supporting documentation (such as completed expense reimbursement forms, copies of receipts and invoices).

Results: We performed specific expense procedures detailed below for all categories that were equal to or greater than 4% of total expenses.

4. Compare and agree each major expense account over 10% of the total expenses to prior period amounts and budget estimates. Obtain and document an explanation of any significant variations (significant defined as 10% or more). Report the analysis as a supplement to the final agreed upon procedures report.

Results: There were no expense categories that exceeded 10% of total expenses and fluctuated greater than 10% from the prior year.

Athletic Student Aid

5. Select a haphazard sample of students from the listing of institutional student aid recipients during the reporting period. Sample shall be no less than 10% of the total student athletes for institutions who have used NCAA's Compliance Assistant software to prepare athletic aid detail, with a maximum sample size of 40 and no less than 20% of total student athletes for institutions who have not, with a maximum sample size of 60.

Results: As the University uses the NCAA's Compliance Assistant software, we selected a sample size of 28 out of the 275 students receiving financial aid.

6. Obtain individual student-account detail for each selection and compare total aid in the institution's student system to the student's detail in CA or the institution report that ties directly to the NCAA membership Financial reporting System.

Results: No exceptions noted.

7. Perform a check of each student selected to ensure their information was reported accurately in either the NCAA's Compliance Assistant software or entered directly into the NCAA Membership Financial Reporting System using the following criteria:

Criterion: The equivalency value for each student-athlete in all sports, including head-count sports, needs to be converted to a full-time equivalency value. The full-time equivalency value is calculated using the athletic grant amount reported on the Calculation of Revenue Distribution Equivalencies Report (CRDE) from the NCAA Compliance Assistant (CA) as the numerator and the full grant amount which is the total cost for tuition, fees, course related books, room and board for an academic year as the denominator. If using the NCAA Compliance Assistant software, this equivalency value should already be calculated for you on that squad list labeled "Revenue Distribution Equivalent Award" and recalculate.

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NCAA AUP REVENUE AND EXPENSE PROCEDURES
JUNE 30, 2021
Attachment A

If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

- a. *Criterion:* Grants-in-aid is calculated by using the revenue distribution equivalencies by sport and in aggregate (Athletic grant amount dividend by the full grant amount).

Procedure: For each student selected, recalculate the grants-in-aid and compare to the CRDE report to determine any discrepancies.

Results: No exceptions noted.

- b. *Criterion:* Other expenses related to attendance (also known as cost of attendance) should not be included in grants-in-aid revenue distribution equivalencies. Only tuition, fees, room, board, and course-related books are countable for grants-in-aid revenue distribution per Bylaw 20.02.07. Note: for compliance purposes equivalencies may include other expenses related to attendance per Bylaw 15.02.2, however these expenses are not allowed to be included for revenue distribution equivalencies.

Procedure: For each student selected, observe that only tuition, fees, room, board, and course-related books are included in the grants-in-aid revenue distribution.

Results: No exceptions noted.

- c. *Criterion:* The full grant amount should be the full cost of tuition for an academic year, not semester or quarter.

Procedure: For each student selected, compare the grant amount shown to the cost of tuition as published the institution and determine whether it is for the full year, not a semester or quarter.

Results: No exceptions noted.

- d. *Criterion:* Student-athletes should only be counted once, regardless of multi-sport participation, and should not receive a revenue distribution equivalency greater than 1.00.

Procedure: For each selection, observe that the student-athlete was counted once and did not receive a revenue distribution equivalency greater than 1.00.

Results: No exceptions noted.

- e. *Criterion:* Athletic grants are valid for revenue distribution purposes only in sports in which the NCAA conducts championship competitions, emerging sports for women and bowl subdivision football.

Procedure: Obtain a list of NCAA championship competitions, emerging sports for women, and bowl subdivision football. For the students selected, compare the sports included within the calculations to those on the list and determine if there are any discrepancies.

Results: No exceptions noted.

- f. *Criterion:* Grants-in-aid are valid for revenue distribution purposes in NCAA sports that do not meet the minimum contests and participants requirements of Bylaw 20.9.6.3.

Procedure: For each student selected, compare grants-in-aid included within the calculation to NCAA sports that do not meet the minimum contests and participation requirements of Bylaw 20.9.6.3 and determine if there are any discrepancies.

Results: No exceptions noted.

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JUNE 30, 2021
Attachment A

If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

- g. Criterion:* Institutions providing grants to student-athletes listed on the CRDE as 'Exhausted Eligibility (fifth year)' or 'Medical' receive credit in the grants-in-aid component.

Procedure: If a student selected is included in the grants-in-aid calculation, obtain and observe letter(s) from the institution to the student communicating the status as 'Exhausted Eligibility (fifth year)' or 'Medical', as applicable, and determine that the student is properly flagged in the compliance software (if used).

Results: No exceptions noted.

- h. Criterion:* The athletics aid equivalency cannot exceed maximum equivalency limits. However, the total revenue distribution equivalency can exceed maximum equivalency limits due to exhausted eligibility and medical equivalencies (reference Bylaw 15.5.3.1).

Procedure: If maximum equivalency limits are exceeded, trace the excess over the limit to exhausted eligibility and medical equivalencies

Results: No exceptions noted.

- i. Criterion:* If a sport is discontinued and the grant(s) are still being honored by the institution, the grant(s) are included in student-athlete aid for revenue distribution purposes.

Procedure: For any selections where the sport is discontinued and the institution has included the related grant for the student, observe documentation that the grant is still being honored by the institution.

Results: Per inquiry of management, there were no sports discontinued. No exceptions noted.

- j. Criterion:* All equivalency calculations should be rounded to two decimal places.

Procedure: For each student selected, observe that calculations have two decimal points.

Results: No exceptions noted.

- k. Criterion:* If a selected student received a Pell Grant, observe the value of the grant is not included in the calculation of equivalencies or the total dollar amount of student athletic aid expense for the institution.

Procedure: If a selected student received a Pell Grant, observe that the value of the grant is not included in the calculation of equivalencies or the total dollar amount of student athletic aid expense for the institution.

Results: No exceptions noted.

- l. Criterion:* If a selected student received a Pell Grant, observe the student's grant was included in the total number and total dollar value of Pell Grants reported for Revenue Distribution purposes in the NCAA Membership Financial Reporting System.

Procedure: If a selected student received a Pell Grant, observe that the student's grant was included in the total number and total dollar value of Pell Grants reported for Revenue Distribution purposes in the NCAA Membership Financial Reporting System.

Results: No exceptions noted.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

8. Recalculate total student aid for each sport and overall based on detailed listing of student aid expense provided by the institution.

Results: No exceptions noted.

Guarantees

9. Obtain and inspect visiting institution's away-game settlement reports received by the institution during the reporting period and agree related expenses to the institution's general ledger and the Schedule and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

10. Obtain and inspect all contractual agreements pertaining to expenses recorded by the institution from guaranteed contests during the reporting period. Compare and agree related amounts expensed by the institution during the reporting period to the institution's general ledger and the Schedule and recalculate totals

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Coaching Salaries, Benefits, and Bonuses Paid by the University and Related Entities

11. Obtain and inspect a listing of coaches employed by the institution and related entities during the reporting period. Select a haphazard sample of 5 coaches' or all if less than 5, that must include football, and men's and women's basketball from the listing.

Results: No exceptions noted.

12. Compare and agree the financial terms and conditions of each selection to the related coaching salaries, benefits, and bonuses recorded by the institution and related entities in the Schedule during the reporting period.

Results: No exceptions noted.

13. Obtain and inspect payroll summary registers for the reporting period for each selection. Compare and agree related payroll registers for the reporting period to the related coaching salaries, benefits and bonuses paid by the institution and related entities expense recorded by the institution in the Schedule during the reporting period.

Results: No exceptions noted.

14. Compare and agree the totals recorded to any employment contracts executed for the sample selected and recalculate totals.

Results: No exceptions noted.

Coaching Other Compensation and Benefits Paid by a Third-Party

15. Obtain and inspect a listing of coaches employed by third parties during the reporting period. Select a haphazard sample of 5 coaches from the listing above, or all if less than 5.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

16. Compare and agree the financial terms and conditions of each selection to the related coaching other compensation and benefits paid by third party and recorded by the institution in the statement during the reporting period.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

17. Obtain and inspect reporting period payroll summary registers for each selection. Compare and agree the related payroll summary register to the coaching other compensation and benefits paid by a third party expenses recorded by the institution in the statement during the reporting period and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Support Staff/Administrative Salaries, Benefits and Bonuses Paid by the University and Related Entities

18. Select a haphazard sample of 5 (or all if fewer than 5) support staff/administrative personnel employed by the institution and related entities during the reporting period.

Results: No exceptions noted.

19. Obtain and inspect the reporting period summary payroll register for each selection. Compare and agree related reporting period payroll summary registers to the related support staff/administrative salaries, benefits and bonuses paid by the institution and related entities expense recorded by the institution in the Schedule during the reporting period and recalculate totals.

Results: No exceptions noted.

Support Staff/Administrative Compensation and Benefits Paid by a Third Party

20. Select a haphazard sample of 5 (or all if fewer than 5) support staff/administrative personnel employed by the third parties during the reporting period.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

21. Obtain and inspect reporting period payroll summary registers for each selection. Compare and agree related reporting period payroll summary registers to the related support/staff administrative other compensation and benefits expense recorded by the institution in the Schedule during the reporting period and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Severance Payments

22. Select a haphazard sample of 5 employees (or all if fewer than 5) receiving severance payments by the institution during the reporting period and agree each severance payment to the related termination letter or employment contract and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Recruiting

23. Obtain documentation of the Institution's recruiting expense policies.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

24. Compare and agree to existing institutional and NCAA-related policies.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

25. Obtain general ledger detail and compare to the total expenses reported.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Team Travel

26. Obtain documentation of the Institution's team travel policies.

Results: We obtained the University fiscal year 2021 Travel and Recruiting Policy.

27. Compare and agree to existing institutional and NCAA-related policies.

Results: No exceptions noted.

28. Obtain general ledger detail and compare to the total expenses reported and recalculate totals.

Results: No exceptions noted.

Sports Equipment, Uniforms and Supplies

29. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate total.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Games Expenses

30. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: No exceptions noted.

Fund Raising, Marketing and Promotion

31. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Sports Camp Expenses

32. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Spirit Groups

33. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Athletic Facility Debt Service, Leases and Rental Fees

34. Obtain a listing of debt service schedules, lease payments and rental fees for athletics facilities for the reporting year. Compare a sample of 5 facility payments including the top two highest facility payments and an additional 3 haphazardly selected payments to additional supporting documentation (e.g. debt financing agreements, leases, rental agreements).

Results: No exceptions noted.

35. Compare amounts recorded to amounts listed in the general ledger detail and recalculate totals.

Results: No exceptions noted.

Direct Overhead and Administrative Expenses

36. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if less than 5) to validate existence of transaction and accuracy of recording by agreeing to related calculations/agreements and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Medical Expenses and Medical Insurance

37. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Memberships and Dues

38. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoice and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Other Operating Expenses and Transfers to Institution

39. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Student-Athlete Meals (non-travel)

40. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

Bowl Expenses

41. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices and recalculate totals.

Results: This category was less than 4% of the total expenses. Therefore, the procedures enumerated above were not applicable.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Additional Minimum Agreed-Upon Procedures

1. For Grants-in-Aid:

- a. Compare and agree the sports sponsored reported in the NCAA Membership Financial Reporting System to the Calculation of Revenue Distribution Equivalencies Report (CRDE) from CA or other report that supports the equivalency calculations from the institution. The NCAA Membership Financial Reporting System populates the sports from the NCAA Sports Sponsorship and Demographics Form as they are reported by the institution. If there is a discrepancy in the sports sponsored between the NCAA Membership Financial Reporting System and the CRDE or other report that supports the equivalency calculations, inquire about the discrepancy and report the reason for the discrepancy in the AUP report.

Results: No exceptions noted.

- b. Compare current year Grants-in-Aid revenue distribution equivalencies to prior year reported equivalencies per the Membership Financial Report submission. Inquire and document an explanation for any variance greater than +/- 4%.

Results: Crowe noted that eleven sports had variances of +/- 4%. Per inquiry of management, fluctuations are due to an increase or decrease of scholarship team members for the given year, increase or decrease due to cost of tuition based on a student athlete having in state or out of state tuition, or an increase due to the NCAA granting an additional year of eligibility to student-athletes due to COVID-19. Crowe compared the number of athletes and cost of tuition in FY21 to FY20 and noted that these explanations appear reasonable.

2. For Sports Sponsorship:

- a. Obtain the institution's Sports Sponsorship and Demographics Forms Report for the reporting year. Compare that the countable sports reported by the institution on the report meet the minimum requirements set forth in Bylaw 20.9.6.3 for the number of contests and the number of participants in each contest that is counted toward meeting the minimum-contest requirement. Report any exceptions. If the institution requested and/or received a waiver related to minimum contests or minimum participants for a particular sport, observe that the sport was not included on the CRDE report. Compare the countable sports from the Sports Sponsorship and Demographics Forms Report to the sports the institution has reported as countable for revenue distribution purposes within the NCAA Membership Financial Reporting System. Report any exceptions.

Results: No exceptions noted. Women's basketball did not meet the minimum contests requirement of 25, but received a COVID-19 waiver. No other waivers were noted.

- b. Compare current year number of Sports Sponsored to prior year reported total per the Membership Financial Report submission. Inquire and document an explanation for any variance.

Results: No exceptions noted.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

3. For Pell Grants:

- a. Agree the total number of Division I student-athletes who, during the academic year, received a Pell Grant award (e.g. Pell Grant recipients on Full Athletic Aid, Pell Grant recipients on Partial Athletic Aid and Pell Grant recipients with no Athletic Aid) and the total dollar amount of these Pell Grants reported in the NCAA Membership Financial Reporting System to a report generated out of the institutions financial aid records of all student-athlete Pell Grants. Note: individual student-aid file testing in step 7 above should tie any selected student athletes who received Pell Grants back to the report of all student athlete Pell Grants to test the completeness and accuracy of the report.

Results: No exceptions noted.

- b. Compare current year Pell Grants total to prior year reported total per the Membership Financial Report submission. Inquire and document an explanation for any variance greater than +/- 20 grants.

Results: No exceptions noted.

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Minimum Agreed-Upon Procedures Program for Other Reporting Items

1. Before the commencement of fieldwork, determine that the amounts reported on the Schedule agree to the institution's general ledger. Recalculate totals.

Results: No exceptions were noted.

Excess Transfers to Institution and Conference Realignment

2. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices, and recalculate totals.

Results: Management of the University informed us that there were no excess transfers to the University or conference realignment expenses. Therefore, the procedures enumerated above were not applicable.

Total Athletics Related Debt

3. Obtain repayment schedules for all outstanding intercollegiate athletics debt during the reporting period and recalculate annual maturities (consisting of principal and interest) provided in the schedules obtained.

Results: No exceptions noted.

4. Agree the total annual maturities and total outstanding athletic related debt to supporting documentation and the institution's general ledger.

Results: No exceptions noted.

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If a specific reporting category is omitted from the schedule or it is less than 4% of the total revenue or expenses, the procedure is not deemed to be applicable for that specific category.

Total Institutional Debt

5. Agree the total outstanding institutional debt to the detail listing provided by the institution and the institution's audited financial statements, if available, or the institution's general ledger.

Results: No exceptions noted.

Value of Athletics Dedicated Endowments

6. Obtain a schedule of all athletics dedicated endowments maintained by athletics, the institution, and affiliated organizations. Agree the fair value in the schedule(s) to the detail listing provided by the institution, the audited financial statements, and the institution's general ledger.

Results: We obtained the University's schedule of all athletics dedicated endowments maintained by athletics, the institution, and affiliated organizations and noted no exceptions.

Value of Institutional Endowments

7. Agree the total fair value of institutional endowments to the detail listing provided by the institution and the institution's audited financial statements, and the institution's general ledger.

Results: No exceptions noted.

Total Athletics Related Capital Expenditures

8. Obtain a schedule of athletics related capital expenditures made by athletics, the institution, and affiliated organizations during the reporting period.

Results: We obtained the University's schedule of athletics related capital expenditures made by athletics, the institution, and affiliated organizations during fiscal year 2021.

9. Obtain general ledger detail and compare to the total expenses reported. Select a haphazard sample of 5 transactions (or all if fewer than 5) to validate existence of transaction and accuracy of recording by agreeing to underlying invoices, and recalculate totals.

Results: No exceptions noted.

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WESTERN KENTUCKY UNIVERSITY
 NCAA AUP YEAR-OVER-YEAR ANALYTICAL COMPARISON
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Operating Revenue:	6/30/2021 <u>Total</u>	6/30/2020 <u>Total</u>	Year-over-Year Variations <u>Totals</u>	
			<u>\$ Diff</u>	<u>% Diff</u>
Ticket Sales	\$ 817,972	\$ 2,418,206	\$ (1,600,234)	(66.2) %
Direct State or Other Government Support	-	-	-	0.0 %
Student Fees	3,454,458	3,215,375	239,083	7.4 %
Direct Institutional Support	12,993,019	14,104,858	(1,111,839)	(7.9) %
Less Transfers to Institution	(2,952,681)	(1,763,148)	(1,189,533)	67.5 %
Indirect Institutional Support	4,620,715	3,746,905	873,810	23.3 %
Guarantees	2,410,500	1,685,803	724,697	43.0 %
Contributions	3,408,011	2,707,668	700,343	25.9 %
In-Kind	-	-	-	0.0 %
Compensation and Benefits Provided by Third Party	63,399	54,013	9,386	17.4 %
Media Rights	-	-	-	0.0 %
NCAA Distributions	443,576	837,446	(393,870)	(47.0) %
Conference Distributions	1,747,300	1,753,190	(5,890)	(0.3) %
Program, Novelty, Parking, and Concessions Sales	220,796	401,208	(180,412)	(45.0) %
Royalties, Licensing, Advertisement and Sponsorships	963,511	1,228,675	(265,164)	(21.6) %
Sports Camp Revenue	173,723	179,471	(5,748)	(3.2) %
Athletics Restricted Endowment and Investment Income	129,750	124,550	5,200	4.2 %
Other Operating Revenue	93,931	125,731	(31,800)	(25.3) %
Bowl Revenues	<u>278,043</u>	<u>711,072</u>	<u>(433,029)</u>	<u>(60.9) %</u>
Total Operating Revenue	<u>\$ 28,866,023</u>	<u>\$ 31,531,023</u>	<u>\$ (2,665,000)</u>	

Please refer to the Revenue Procedures noted on page 5 for major revenue accounts over 10% of the total revenues with year-over-year changes greater than 10%.

(Continued)

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Operating Expenditures:	6/30/2021	6/30/2020	Year-over-Year Variations	
	<u>Total</u>	<u>Total</u>	<u>Totals</u>	
			<u>\$ Diff</u>	<u>% Diff</u>
Athletic Student Aid	\$ 6,324,367	\$ 6,145,294	\$ 179,073	2.9 %
Guarantees	573,118	562,996	10,122	1.8 %
Coaching Salaries, Benefits, and Bonuses Paid by the University and Related Entities	5,473,194	5,917,749	(444,555)	(7.5) %
Coaching Salaries, Benefits and Bonuses paid by a third party	33,913	30,424	3,489	11.5 %
Support Staff/Administrative Compensation, Benefits and Bonuses Paid by University and Related Entities	4,232,711	4,455,427	(222,716)	(5.0) %
Support Staff/Administrative Compensation, Benefits and Bonuses paid by Third Party	29,486	23,587	5,899	25.0 %
Severance Payments	-	620,241	(620,241)	(100.0)%
Recruiting	49,031	376,478	(327,447)	(87.0) %
Team Travel	1,923,113	1,913,038	10,075	0.5 %
Equipment, Uniforms and Supplies	708,502	716,611	(8,109)	(1.1) %
Game Expenses	1,141,902	1,604,554	(462,652)	(28.8) %
Fund Raising, Marketing and Promotion	843,567	731,715	111,852	15.3 %
Sports Camp Expenses	86,202	281,077	(194,875)	(69.3) %
Spirit Groups	120,751	70,822	49,929	70.5 %
Athletic Facilities Debt Service, Leases and Rental Fees	3,060,913	2,977,918	82,995	2.8 %
Direct Overhead and Administrative Expenses	-	934,754	(934,754)	(100.0)%
Indirect Institutional Support	1,559,802	768,987	790,815	102.8 %
Medical Expenses and Medical Insurance	541,743	635,658	(93,915)	(14.8) %
Membership Dues	8,246	402,306	(394,060)	(98.0) %
Student-Athlete Meals (non-travel)	435,115	489,726	(54,611)	(11.2) %
Other Operating Expenses	1,396,935	1,034,691	362,244	35.0 %
Bowl Expenses	<u>323,412</u>	<u>836,970</u>	<u>(513,558)</u>	<u>(61.4) %</u>
Total Operating Expenses	<u>\$ 28,866,023</u>	<u>\$ 31,531,023</u>	<u>\$ (2,665,000)</u>	

Please refer back to Expense Procedures noted on page 10 for major expense accounts over 10% of the total expenses with year-over-year changes greater than 10%.