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INDEPENDENT ACCOUNTANT’S REPORT ON APPLYING AGREED-UPON PROCEDURES

May 25, 2016

The Honorable Nikki R. Haley, Governor
and
Members of the Board
South Carolina State Board for Technical
and Comprehensive Education
Columbia, South Carolina

We have performed the procedures described below, which were agreed to by the governing body and management of the South Carolina State Board for Technical and Comprehensive Education (the Board), solely to assist you in evaluating the performance of the Board for the fiscal year ended June 30, 2015, in the areas addressed. The Board’s management is responsible for its financial records, internal controls and compliance with State laws and regulations. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified parties in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. **Cash Receipts and Revenues**
   - We inspected twenty-five selected recorded receipts to determine if these receipts were properly described and classified in the accounting records in accordance with the agency’s policies and procedures and State regulations.
   - We inspected nine selected recorded receipts to determine if these receipts were recorded in the proper fiscal year.
   - We made inquiries and performed substantive procedures to determine if revenue collection and retention or remittance were supported by law.
   - We compared current year recorded revenues at the subfund and account level from sources other than State General Fund appropriations to those of the prior year. We investigated changes in the general, earmarked, restricted and federal funds to ensure that revenue was classified properly in the agency’s accounting records. The scope was based on agreed upon materiality levels ($5,100 – general fund, $64,000 – earmarked fund, $6,700 – restricted fund, and $3,900 – federal fund) and ± 10 percent.
2. Non-Payroll Disbursements and Expenditures
   • We inspected twenty-five selected recorded non-payroll disbursements to determine if these disbursements were properly described and classified in the accounting records in accordance with the agency’s policies and procedures and State regulations, were bona fide disbursements of the Board, and were paid in conformity with State laws and regulations; if the acquired goods and/or services were procured in accordance with applicable laws and regulations.
   • We inspected twenty-five selected recorded non-payroll disbursements to determine if these disbursements were recorded in the proper fiscal year.
   • We inspected the Board’s distribution of funding to technical colleges to determine if the distributions were performed in accordance with agency policies and procedures and State regulations.
   • We compared current year expenditures at the subfund and account level to those of the prior year. We investigated changes in the general, earmarked, restricted and federal funds to ensure that expenditures were classified properly in the agency’s accounting records. The scope was based on agreed upon materiality levels ($665,000 – general fund, $100,200 – earmarked fund, $289,000 – restricted fund, and $8,600 - federal fund) and ± 10 percent.

   The individual transactions selected were chosen randomly. We found no exceptions as a result of the procedures.

3. Payroll Disbursements and Expenditures
   • We inspected twenty-five selected recorded payroll disbursements to determine if the selected payroll transactions were properly described, classified, and distributed in the accounting records; persons on the payroll were bona fide employees; and payroll transactions were properly authorized and were in accordance with existing legal requirements and processed in accordance with the agency’s policies and procedures and State regulations.
   • We inspected payroll transactions for six selected new employees and five individuals who terminated employment to determine if the employees were added and/or removed from the payroll in accordance with the agency’s policies and procedures, that the employee’s first and/or last pay check was properly calculated and that the employee’s leave payout was properly calculated in accordance with applicable State law.
   • We compared current year payroll expenditures at the subfund and account level to those of the prior year. We investigated changes in the general, earmarked, restricted and federal funds to ensure that expenditures were classified properly in the agency’s accounting records. The scope was based on agreed upon materiality levels ($665,000 – general fund, $100,200 – earmarked fund, $289,000 –restricted fund, and $8,600 federal fund) and ± 10 percent.
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- We compared the percentage change in recorded personal service expenditures to the percentage change in employer contributions; and computed the percentage distribution of recorded fringe benefit expenditures by fund source and compared the computed distribution to the actual distribution of recorded payroll expenditures by fund source. We investigated changes of ± 10 percent to ensure that payroll expenditures were classified properly in the agency’s accounting records.

The individual transactions selected were chosen randomly. We found no exceptions as a result of the procedures.

4. **Journal Entries and Transfers**
   - We inspected eight selected recorded journal entries and five transfers to determine if these transactions were properly described and classified in the accounting records; they agreed with the supporting documentation, the purpose of the transactions was documented and explained, the transactions were properly approved, and were mathematically correct; and the transactions were processed in accordance with the agency’s policies and procedures and State regulations.

The individual transactions selected were chosen randomly. We found no exceptions as a result of the procedures.

5. **Appropriation Act**
   - We inspected agency documents, observed processes, and/or made inquiries of agency personnel to determine the Board’s compliance with Appropriation Act general provisos as listed in the Appropriation Act work program, and agency specific provisos, if applicable.

We found no exceptions as a result of the procedures.

6. **Reporting Packages**
   - We obtained copies of all reporting packages as of and for the year ended June 30, 2015, prepared by the Board and submitted to the State Comptroller General. We inspected them to determine if they were prepared in accordance with the Comptroller General's Reporting Policies and Procedures Manual requirements and if the amounts reported in the reporting packages agreed with the supporting workpapers and accounting records.

Our finding as a result of these procedures is presented in Miscellaneous Commitments in the Accountant’s Comments section of this report.

7. **Schedule of Federal Financial Assistance**
   - We obtained a copy of the schedule of federal financial assistance for the year ended June 30, 2015, prepared by the Board and submitted to the State Auditor. We inspected it to determine if it was prepared in accordance with the State Auditor's letter of instructions; if the amounts agreed with the supporting workpapers and accounting records.

We found no exceptions as a result of the procedures.
8. **Status of Prior Findings**
   - We inquired about the status of the finding reported in the Accountant’s Comments section of the State Auditor’s Report on the Board resulting from our engagement for the fiscal year ended June 30, 2014, to determine if the Board had taken corrective action.

   We found no exceptions as a result of the procedures.

   The concept of materiality does not apply to findings to be reported in an agreed-upon procedures engagement. Therefore, all findings from the application of the agreed-upon procedures must be reported unless the definition of materiality is agreed to by the specified parties. Management of the Board has agreed that the following deficiencies will not be included in the State Auditor’s Report on Applying Agreed-Upon Procedures:

   - Clerical errors of less than $100 related to processing cash receipts and cash disbursements transactions unless the errors occur in ten percent or more of the transaction class tested.
   - Clerical errors of less than $100 related to reporting packages.
   - Errors in applying account coding definitions to accounting transactions unless it is determined that ten percent or more of the accounting transactions tested were found to be in error.
   - Reporting packages which are submitted less than three business days after the due date unless it is determined that more than two of the reporting packages were submitted late.
   - Submission of the Schedule of Federal Financial Assistance less than three business days late.

   We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the specified elements, accounts, or items. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

   This report is intended solely for the information and use of the Governor and of the governing body and management of the South Carolina State Board for Technical and Comprehensive Education and is not intended to be and should not be used by anyone other than these specified parties.

   [Signature]

   George L. Kennedy, III, CPA
   State Auditor
ACCOUNTANT’S COMMENTS
SECTION A - VIOLATION OF STATE LAWS, RULES OR REGULATIONS

Management of each State agency is responsible for establishing and maintaining internal controls to ensure compliance with State Laws, Rules or Regulations. The procedures agreed to by the agency require that we plan and perform the engagement to determine whether any violations of State Laws, Rules or Regulations occurred.

The condition described in this section has been identified as a violation of State Laws, Rules or Regulations.
MISCELLANEOUS COMMITMENTS

Condition:
We selected nine of the largest new project commitments for testing from approximately forty new project commitments. The testing determined that the Commitment balance reported to the Comptroller General’s Office on the Significant Miscellaneous Commitments Form was overstated due to the inclusion of new project commitments which were not yet board approved at the end of the fiscal year.

Cause:
Some budgets for projects in the discovery phase, but not yet board approved, got comingled with approved project commitments in determining the total commitment.

Effect:
Seven of the nine new project commitments tested reported a balance which was not board approved at year end and their combined commitment balance totaled approximately forty percent of the Board’s total reported commitment balance.

Criteria:
Section 3.16 of the Comptroller General’s Office Reporting Policies and Procedures Manual provides guidance for determination of the reportable miscellaneous commitment balance.

Recommendation:
We recommend the Board review its procedures for compilation of reportable miscellaneous commitments to ensure that balances are not reported until they meet the Board and Comptroller General’s Office criteria of an established commitment.

Management’s Response:
As a result of misinterpretation of the reporting package instruction, significant miscellaneous commitments were overstated because the inclusion of commitments not approved by the Board. We concur with the finding. We will adhere to the recommendation of the Office of the State Auditor, commitments will not be reported unless they meet the Board and the South Carolina Comptroller General's Office established commitment criteria.
SECTION B - STATUS OF PRIOR FINDING

During the current engagement, we reviewed the status of corrective action taken on the finding reported in the Accountant's Comments section of the State Auditor's Report on the Board for the fiscal year ended June 30, 2014, and dated May 7, 2015. We determined that the Board has taken adequate corrective action on the finding.
4 copies of this document were published at an estimated printing cost of $1.32 each, and a total printing cost of $5.28. Section 1-11-425 of the South Carolina Code of Laws, as amended, requires this information on printing costs be added to the document.