## CONTENTS

<table>
<thead>
<tr>
<th>I.</th>
<th>INDEPENDENT ACCOUNTANT’S REPORT ON APPLYING AGREED-UPON PROCEDURES</th>
<th>1</th>
</tr>
</thead>
<tbody>
<tr>
<td>II.</td>
<td>ACCOUNTANT’S COMMENTS</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SECTION A - MATERIAL WEAKNESS AND/OR VIOLATION OF STATE LAWS, RULES OR REGULATIONS</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>RECONCILIATIONS</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>SECTION B - STATUS OF PRIOR FINDING</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>MANAGEMENT’S RESPONSE</td>
<td>8</td>
</tr>
</tbody>
</table>
INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

April 23, 2004

The Honorable Mark Sanford, Governor
and
Commission Members
South Carolina Commission for the Blind
Columbia, South Carolina

We have performed the procedures described below, which were agreed to by the governing body and management of the South Carolina Commission for the Blind (the Commission), solely to assist you in evaluating the performance of the Commission for the fiscal year ended June 30, 2003, in the areas addressed. The Commission'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 selected recorded receipts to determine if these receipts were properly described and classified in the accounting records and internal controls over the selected receipt transactions were adequate to detect errors and/or irregularities.
   - We inspected selected recorded receipts to determine if these receipts were recorded in the proper fiscal year.
   - We compared amounts recorded in the general ledger and subsidiary ledgers to those in the State's accounting system (STARS) as reflected on the Comptroller General's reports to determine if recorded revenues were in agreement.
   - 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 from sources other than State General Fund appropriations to those of the prior year to evaluate the reasonableness of collected and recorded amounts by revenue account.
The individual transactions selected were chosen randomly. Our finding as a result of these procedures is presented in Reconciliations in the Accountant’s Comments section of this report.

2. **Non-Payroll Disbursements and Expenditures**
   - We inspected selected recorded non-payroll disbursements to determine if these disbursements were properly described and classified in the accounting records, were bona fide disbursements of the Commission, 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; and if internal controls over the selected disbursement transactions were adequate to detect errors and/or irregularities.
   - We inspected selected recorded non-payroll disbursements to determine if these disbursements were recorded in the proper fiscal year.
   - We compared amounts recorded in the general ledger and subsidiary ledgers to those in various STARS reports to determine if recorded expenditures were in agreement.
   - We compared current year expenditures to those of the prior year to determine the reasonableness of amounts paid and recorded by expenditure account.

The individual transactions selected were chosen randomly. Our finding as a result of these procedures is presented in Reconciliations in the Accountant’s Comments section of this report.

3. **Payroll Disbursements and Expenditures**
   - We inspected 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; payroll transactions, including employee payroll deductions, were properly authorized and were in accordance with existing legal requirements; and internal controls over the selected payroll transactions were adequate to detect errors and/or irregularities.
   - We inspected selected payroll vouchers to determine if the vouchers were properly approved and if the gross payroll agreed to amounts recorded in the general ledger and in STARS.
   - We inspected payroll transactions for selected new employees and those who terminated employment to determine if internal controls over these transactions were adequate.
   - We compared amounts recorded in the general ledger and subsidiary ledgers to those in various STARS reports to determine if recorded payroll and fringe benefit expenditures were adequate to detect errors and/or irregularities.
   - We compared current year recorded payroll expenditures to those of the prior year; 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 to determine if recorded payroll and fringe benefit expenditures were reasonable by expenditure account.

The individual transactions selected were chosen randomly. We found no exceptions as a result of the procedures.
4. **Journal Entries, Operating Transfers and Appropriation Transfers**
   - We inspected selected recorded journal entries and all operating and appropriation transfers to determine if these transactions were properly described and classified in the accounting records; they agreed with the supporting documentation, were adequately documented and explained, were properly approved, and were mathematically correct; and the internal controls over these transactions were adequate to detect errors and/or irregularities.

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

5. **General Ledger and Subsidiary Ledgers**
   - We inspected selected entries and monthly totals in the subsidiary records of the Commission to determine if the amounts were mathematically accurate; the numerical sequences of selected document series were complete; the selected monthly totals were accurately posted to the general ledger; and the internal controls over the selected transactions were adequate to detect errors and/or irregularities.

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

6. **Reconciliations**
   - We obtained all monthly reconciliations prepared by the Commission for the year ended June 30, 2003, and inspected selected reconciliations of balances in the Commission’s accounting records to those in STARS as reflected on the Comptroller General’s reports to determine if they were accurate and complete. For the selected reconciliations, we determined if they were timely performed and properly documented in accordance with State regulations, recalculated the amounts, agreed the applicable amounts to the Commission’s general ledger, agreed the applicable amounts to the STARS reports, determined if reconciling differences were adequately explained and properly resolved, and determined if necessary adjusting entries were made in the Commission’s accounting records and/or in STARS.

The reconciliations selected were chosen randomly. Our finding as a result of these procedures is presented in Reconciliations in the Accountant’s Comments section of this report.

7. **Compliance**
   - We confirmed through inspection of payroll and non-payroll disbursement vouchers, cash receipts and other documents, inquiry of agency personnel and/or observation of agency personnel performing their assigned duties, the Commission’s compliance with all applicable financial provisions of the South Carolina Code of Laws, Appropriation Act, and other laws, rules, and regulations for fiscal year 2003.

Our finding as a result of these procedures is presented in Reconciliations in the Accountant’s Comments section of this report.
8. **Closing Packages**
   - We obtained copies of all closing packages as of and for the year ended June 30, 2003, prepared by the Commission and submitted to the State Comptroller General. We inspected them to determine if they were prepared in accordance with the Comptroller General's GAAP Closing Procedures Manual requirements; if the amounts were reasonable; and if they agreed with the supporting workpapers and accounting records.

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

9. **Schedule of Federal Financial Assistance**
   - We obtained a copy of the schedule of federal financial assistance for the year ended June 30, 2003, prepared by the Commission 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 were reasonable; and if they agreed with the supporting workpapers and accounting records.

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

10. **Status of Prior Finding**
    We inquired about the status of the deficiency described in the finding reported in the Accountant’s Comments section of the State Auditor’s Report on the Commission resulting from our engagement for the fiscal year ended June 30, 2001, to determine if adequate corrective action has been taken. (We applied no procedures to the Commission’s accounting records and internal controls for the year ended June 30, 2002.)

    We found no exceptions as a result of the procedures.

    We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the specified areas, 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 Commission and is not intended to be and should not be used by anyone other than these specified parties.

[Signature]

Thomas L. Wagner, Jr., CPA
State Auditor
ACCOUNTANT’S COMMENTS
SECTION A - MATERIAL WEAKNESS AND/ VIOLATION OF STATE LAWS, RULES OR REGULATIONS

The procedures agreed to by the agency require that we plan and perform the engagement to obtain reasonable assurance about whether noncompliance with the requirements of State Laws, Rules or Regulations occurred and whether internal accounting controls over certain transactions were adequate. Management of the entity is responsible for establishing and maintaining internal controls. A material weakness is a condition in which the design or operation of one or more of the specific internal control components does not reduce to a relatively low level the risk that errors or irregularities in amounts that would be material in relation to the financial statements may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. Therefore, the presence of a material weakness or violation will preclude management from asserting that the entity has effective internal controls.

The condition described in this section has been identified as a material weakness or violation of State Laws, Rules or Regulations.
The Commission did not perform timely monthly reconciliations between its books and those of the State Comptroller General, who maintains the State's books (STARS) for revenues, expenditures, cash, and CSA467 report (federal programs). We randomly selected three fiscal months' reconciliations for testing. The September and January reconciliations were not performed until November and May, respectively. The fiscal month 13 (year-end) reconciliations were not performed until January 2004.

Because the monthly reconciliations were not performed in a timely fashion, we found numerous errors between the Commission’s books and STARS that had not been detected and corrected by year-end. We determined that the errors caused misstatements in the State’s financial statements, the schedule of federal financial assistance, and the grant/contribution receivables and deferred revenue closing package.

The STARS Policies and Procedures Manual (STARS Manual) requires reconciliations to be performed at least monthly on a timely basis, be documented in writing in an easily understandable format with all supporting working papers maintained for audit purposes, be signed and dated by the preparer, and be reviewed and approved in writing by an appropriate agency official other than the preparer. Errors discovered through the reconciliation process must be promptly corrected in the agency’s accounting records and/or in STARS as appropriate.

We recommend the Commission complete all monthly reconciliations in accordance with STARS Manual instructions. The Commission should identify and correct errors in its accounting records and/or STARS as necessary. We further recommend that all reconciliations be reviewed and approved in writing by an appropriate official other than the preparer.
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 Commission for the fiscal year ended June 30, 2001, and dated October 24, 2002. (We applied no procedures to the Commission’s accounting records and internal controls for the year ended June 30, 2002.) We determined that the Commission has taken adequate corrective action on the finding.
MANAGEMENT’S RESPONSE
AGENCY RESPONSE TO ACCOUNTANT’S COMMENTS

June 30, 2004

The Director of Finance for the Commission for the Blind, who was a long-term employee, left Commission employment on July 2, 2002. Her position was filled with two acting directors, and a permanent director was named in January 2003. During this period, a number of employees in the Finance Department found other employment. New staff and vacancies left the Finance Department with inadequate human resources to complete all of the required work. Becoming aware that the reconciliations had not been completed, beginning in September, 2003, temporary staff was hired and intense efforts to complete the reconciliations began.

Our corrective action is to place a fiscal analyst in charge of the reconciliations. Each month they will be reviewed by the Director of Finance and the Commissioner both of whom will sign off after reviewing for compliance with STARS requirements.
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