South Carolina State Commission for Minority Affairs
Columbia, South Carolina
April 10, 2008

The Honorable Mark Sanford, Governor
and
Members of the Commission
South Carolina State Commission for Minority Affairs
Columbia, South Carolina

This report resulting from the application of certain agreed-upon procedures to certain internal controls and accounting records of the South Carolina State Commission for Minority Affairs for the fiscal year ended June 30, 2007, was issued by Brown CPA, LLC, Certified Public Accountants, under contract with the South Carolina Office of the State Auditor.

If you have any questions regarding this report, please let us know.

Respectfully submitted,

Richard H. Gilbert, Jr., CPA
Deputy State Auditor

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Independent Accountant’s Report on Applying Agreed-Upon Procedures

Mr. Richard H. Gilbert, Jr., CPA
Deputy State Auditor
State of South Carolina
Columbia, South Carolina

We have performed the procedures described below, which were agreed to by the South Carolina Office of State Auditor and management of South Carolina State Commission for Minority Affairs (the “Commission”), solely to assist you in evaluating the performance of the Commission for the fiscal year ended June 30, 2007, in the areas addressed. The Commission 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 in accordance with the Commission’s policies and procedures and State regulations.
   - 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 or remittance were supported by law.
   - We compared current year recorded revenues at the subfund and object code level from sources other than State General Fund appropriations to those of the prior year. We investigated changes in the earmarked, restricted and federal funds to ensure that revenue was classified properly in the Commission’s accounting records. The scope was based on agreed upon materiality levels $6,000 – earmarked fund and ± 10 percent.

The individual transactions were chosen randomly. We found no exceptions as a result of the procedures.
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 in accordance with the Commission’s policies and procedures and State regulations, were bona fide disbursements of the South Carolina State Commission for Minority Affairs, 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 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 at the subfund and major object code level to those of the prior year. We investigated changes in the general and earmarked fund to ensure that expenditures were classified properly in the Commission’s accounting records. The scope was based on agreed upon materiality levels $13,000 – general fund, $7,900 – earmarked 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 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 processed in accordance with the Commission’s policies and procedures and State regulations.
   • 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 the employees were added and/or removed from the payroll in accordance with the Commission’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 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 in agreement.
   • We compared current year recorded payroll expenditures at the subfund and major object code level to those of the prior year. We investigated changes in the general and earmarked funds to ensure that expenditures were classified properly in the Commission’s accounting records. The scope was based on agreed upon materiality levels 13,000 – general fund, $7,900 – earmarked fund and ± 10 percent.
   • 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 ± 15 percent to ensure that payroll expenditures were classified properly in the Commission’s accounting records. 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, operating transfers, and appropriation 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 Commission’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. **General Ledger and Subsidiary Ledgers**
   - We inspected selected entries and monthly totals in the subsidiary records of the South Carolina State Commission for Minority Affairs 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 selected entries were processed in accordance with the Commission’s policies and procedures and State regulations. 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, 2007, 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 accounts reconciled. 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 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 the Accountant’s Comments section of this report.

7. **Appropriation Act**
   - We inspected documents, observed processes, and/or made inquiries of Commission personnel to determine the Commission’s compliance with Appropriation Act general and Commission specific provisos. We found no exceptions as a result of the procedures.

8. **Closing Packages**
We obtained copies of all closing packages as of and for the year ended June 30, 2007 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; and if the amounts reported in the closing packages agreed with the supporting workpapers and accounting records.

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 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, the South Carolina Office of the State Auditor, and the South Carolina State Commission for Minority Affairs and management of the Commission and is not intended to be and should not be used by anyone other than these specified parties.

BROWN CPA, LLC.

Irmo, South Carolina
April 4, 2008
ACCOUNTANT’S COMMENTS

SECTION A – OTHER WEAKNESS

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 South Carolina State Commission for Minority Affairs (the “Commission”) 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 while performing the agreed-upon procedures but it is not considered a violation of State Laws, Rules or Regulations.

Reconciliations

The Commission did not timely complete two of the thirteen monthly reconciliations during fiscal year 2007. The Commission’s internal policy requires monthly reconciliations to be performed within the 15 business days of month end.

We were told by Commission personnel that the deficiencies occurred during a period of transition when the Commission did not have a full time staff accountant.

A sound system of internal controls includes policies and procedures to ensure that personnel are properly trained.

We recognize the Commission has limitations due to the size of the agency. However, we recommend the Commission establish procedures to ensure that personnel are trained to perform multiple duties so that in the event the agency experiences turnover in key positions they will be able to timely accomplish routine accounting functions.
**SECTION B – STATUS OF PRIOR FINDING**

During the current engagement, we reviewed the status of corrective action taken on each of the findings reported in the Accountant's Comments section of the Independent Accountant’s Report for the Commission for the fiscal year ended June 30, 2006. The prior comments and status are summarized below.

<table>
<thead>
<tr>
<th>COMMENT</th>
<th>STATUS</th>
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<tbody>
<tr>
<td><strong>Cash Receipts and Revenue / Appropriation Act – Untimely Deposit of Receipts</strong>&lt;br&gt;The Commission did not timely deposit receipts. Proviso 72.1 of the 2006 State Appropriations Act specifies that all revenues must be remitted to the State Treasurer at least once each week. During our testing of cash receipts we revealed that a deposit made on March 30, 2006 contained six separate receipts from various state agencies and a private citizen received between December 2005 and February 2006.</td>
<td>Corrective Action Taken</td>
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| **Reconciliations**<br>The Commission did not timely prepare the monthly fiscal year 2006 reconciliations. The Comptroller General’s Policies and Procedures Manual (STARS Manual) requires agencies to perform reconciliations shortly after month-end in order to promptly correct errors discovered during the reconciliation process. It also requires agencies to maintain all supporting documentation for audit purposes. | See Similar Comment for the Current Year |
ATTACHMENT A
Executive Director's Response

Section A – Other Weaknesses

Failure to prepare timely reconciliations - The agency Internal Operating Policy requires reconciliation reports be prepared by the 15\textsuperscript{th} working day of the month for the preceding month. During the first quarter of fiscal year 06.07 two reports were not completed within the required time period. During this period a new employee began preparing these reports with review by a state dual employee, who assisted during the training of the new employee. These two exceptions took place during the transition and no additional exceptions were identified during the last three quarters of the fiscal year. This problem has been corrected and we are compliant with our 15 day reconciliation policy.