Independent Accountant's Report on Applying Agreed-Upon Procedures

March 26, 2020

Members of the Commission
South Carolina Human Affairs Commission
Columbia, South Carolina

We have performed the procedures described in Attachment 1, which were agreed to by the management of the South Carolina Human Affairs Commission (the Commission), on the systems, processes and behaviors related to financial activity of the Commission for the fiscal year ended June 30, 2019. The Commission's management is responsible for the systems, processes and behaviors related to financial activity. 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 in Attachment 1 either for the purpose for which the agreed-upon procedures report has been requested or for any other purpose.

This agreed-upon procedures engagement was conducted 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, the objective of which would be an opinion or conclusion, respectively, on the systems, processes and behaviors related to financial activity of the Commission. Accordingly, we do not express an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

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 Commission has agreed that the following deficiencies will not be included in the State Auditor's Report on Applying Agreed-Upon Procedures:

- Errors of less than $1,000 related to cash receipts and non-payroll cash disbursements transactions.
- Errors of less than $1,000 related to reporting packages.

This report is intended solely for the information and use of the governing body and management of the South Carolina Human Affairs Commission and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

George L. Kennedy, III, CPA
State Auditor
Cash Receipts/Revenues

1. Compare current year revenues at the subfund and account level from sources other than State General Fund appropriations to those of the prior year. Obtain from management an understanding of variations over $10,000 and 10%.

2. Randomly select ten cash receipts transactions and inspect supporting documentation to:
   - Ensure transaction amount, date, payor, document number, and account classification are properly reported in the general ledger.
   - Determine that revenues/receipts were deposited in a timely manner, in accordance with Proviso 117.1 of the Appropriation Act.
   - Ensure that both revenue collections and amounts charged are properly authorized by law.
   - Determine that receipts are recorded in the proper fiscal year.

Findings

Approximately $600,000 of contracted sales of services revenue was miscoded as operating grant revenue and approximately $475,000 of restricted grant revenue was misclassified as unrestricted.

In addition, one receipt selected for inspection was deposited approximately one month after the receipt date, and timely deposit could not be confirmed for two other receipts because the receipt date was not documented.

Management’s Response

The Commission will review the general ledger codes used to receive funds more carefully. In addition, we have worked with the staff to ensure that the receipt date for checks will be documented.

Cash Disbursements/Non-Payroll Expenditures

3. Compare current year non-payroll expenditures at the subfund and account level to those of the prior year. Obtain from management an understanding of variations over $50,000 – General Fund, $20,000 – Earmarked Fund, $10,000 – Federal Fund and 10%.

4. Randomly select fifteen non-payroll disbursements and inspect supporting documentation to determine:
   - Transaction is properly completed as required by Commission procedures; invoice(s) agree(s) with general ledger as to vendor, amount, number, and date.
   - All supporting documents and approvals required by Commission procedures are present and agree with the invoice.
   - The transaction is a bona fide expenditure of the Commission.
   - The transaction is properly classified in the general ledger.
   - Disbursement complied with applicable State laws, rules, and regulations including the State Consolidated Procurement Code, state travel regulations etc.
   - Disbursements are recorded in the proper fiscal year.
   - Clerical accuracy / confirm proper sales/use tax.
Cash Disbursements/Non-Payroll Expenditures (Continued)

For federally funded cash disbursements/non-payroll expenditures selected, inspect supporting documentation to determine:

- Charges are necessary and reasonable for the proper administration of the program, incurred during the approved grant period, given consistent accounting treatment and applied uniformly to both federally assisted and other activities of the recipient.

We found no exceptions as a result of the procedures. In the performance of the procedures, management provided information that revealed the Commission was not billed for, and did not pay, annual office rent to the Department of Administration for fiscal year 2019.

Payroll

5. Compare current year payroll expenditures at the subfund and account level to those of the prior year. Obtain from management an understanding of variations over $50,000 – General Fund, $20,000 – Earmarked Fund, $10,000 – Federal Fund and 10%.

6. Compute the percentage distribution of fringe benefit expenditures by fund source and compare to the actual distribution of recorded personal service expenditures by fund source. Obtain an explanation of variations greater than 10%.

7. Compare the percentage change in personal service expenditures between the current year and prior year to the percentage change in employer contributions expenditures between the current year and prior year. Obtain an explanation of variations greater than 10%.

8. Randomly select five employee payments and inspect supporting documentation during the fiscal year to:
   - Obtain and inspect the employee’s payroll and/or personnel file for various forms, communications, etc., to confirm that the person is a bona fide employee of the Commission.
   - Agree gross pay to supporting documentation confirming all changes to gross salary for the year. Determine that all changes have been properly approved.

9. Randomly select three employees who terminated employment during the fiscal year to determine if they were removed from the payroll in accordance with the Commission’s policies and procedures, that the employee’s last pay check was properly calculated and that the employee’s leave payout was properly calculated in accordance with applicable State law.

10. Randomly select three employees hired during the fiscal year to determine if they were added to the payroll in accordance with the Commission’s policies and procedures and that their first pay check was properly calculated in accordance with applicable State law.

11. Select five agreed upon bonus pay disbursements to determine:
   - Employee does not make more than $100,000 annually.
   - Bonuses received during the year did not exceed $3,000.
   - Payment agreed to supporting documentation.
   - Bonus pay was approved by the appropriate supervisor.

We found no exceptions as a result of the procedures.
Journal Entries

12. Select five agreed upon journal entries for the fiscal year to:

- Trace postings to the general ledger, confirming amounts agree with supporting documentation.
- Confirm transaction is properly approved.
- Inspect supporting documentation to confirm the purpose of the transaction.

We found no exceptions as a result of the procedures.

Reporting Packages

13. Obtain copies of fiscal year end reporting packages submitted to the Office of the State Comptroller General (CG). Inspect the Master Reporting Package Checklist to determine that it was completed in accordance with CG instructions and that the appropriate reporting packages were prepared and submitted by the due date established by the CG’s Reporting Policies and Procedures Manual.

14. In addition to the procedure above, perform the following:

- Grants and Contributions Revenue Reporting Package

  Select all grants to determine if the reported beginning and ending fund balances, receipts, qualified expenditures, fund, grant number, and CFDA number agree to the (South Carolina Enterprise Information System (SCEIS) general ledger and/or SCEIS Display Grant Master. In addition, recalculate the reported total receivables and deferred revenue.

- Operating Leases Reporting Package

  Determine if amounts agree to the SCEIS general ledger, the SCEIS Yearend Reporting – Operating Lease Expense w/ Vendor report and/or Commission prepared records and that package responses are accurate. In addition, based on inspection of invoices and lease agreements, determine if rental payments were properly classified, coded and calculated by inspecting and recalculating the following reported amounts: (1) Three agreed upon selected contingent rental payments; (2) One agreed upon selected payment from the remaining rental payment classifications (i.e. one time and other detailed rental charges). Additionally, inspect the information reported on the Future Minimum Lease Payment Schedule to determine that each lease was reported accurately and to determine the reported amounts were properly classified, coded and calculated. If applicable, obtain copies of the leases submitted to the CG to determine if all required leases were included in the reporting package submission.

- Accounts Payable Reporting Package

  Determine if responses and reported amounts are reasonable/accurate based on the inspection of the SCEIS general ledger, SCEIS Yearend Reporting – Prior Year Payables with Vendor and / or Commission prepared records. In addition, select all payable transactions to determine if reported amounts were properly identified, classified, and reported on the reporting package.

- Litigation Reporting Package

  Select five agreed upon transactions from the SCEIS Yearend Reporting – Litigation Expense report to determine if charges were properly coded and approved.
Reporting Packages (Continued)

- Subsequent Events Questionnaire

Determine if responses are reasonable/accurate and any required supplemental information was properly prepared and submitted based on inspection of the SCEIS general ledger and/or Commission prepared records. In addition, select all payables reported on the Subsequent Events Accounts Payable Worksheet and determine if the amounts were properly classified, calculated and reported and excluded from the original Accounts Payable Reporting Package submission.

Finding

Approximately $1,000 of service agreement payments were improperly reported as contingent rental payments.

Management’s Response

The Commission worked with the CG on the Operating Leases Reporting Package; the Commission decided that the service payments listed above should be listed as having contingent rents. Moving forward, the Commission will carefully review and classify the service agreement payments listed on the Operating Leases Reporting Package.

Appropriation Act/Laws

15. Confirm compliance with South Carolina Code of Laws 10-1-140 by observing the inventory count documentation completed by management.

16. Confirm compliance with Commission-specific state provisos by inquiring with management and observing supporting documentation, where applicable.

We found no exceptions as a result of the procedures.