

**Texas Higher Education Coordinating Board
Austin, Texas**

Blinn College

**Independent Accountant's Report
On Applying Agreed-Upon Procedures
November 16, 2010**

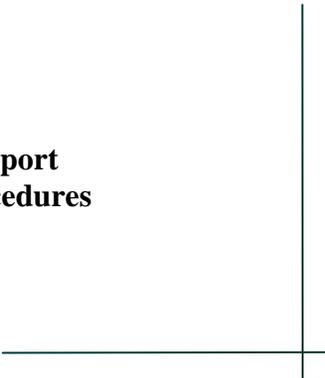


Table of Contents

INDEPENDENT ACCOUNTANT’S REPORT	1
Schedule A: Schedule of Agreed-Upon Procedures.....	2

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

Texas Higher Education Coordinating Board
Austin, TX

We have performed the procedures in the attached Schedule A, which were agreed-to by the Texas Higher Education Coordinating Board (THECB), solely to assist you in evaluating Blinn College's compliance with the American Recovery and Reinvestment Act (ARRA) grant funding policies and procedures. This agreed-upon procedures engagement was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States. The sufficiency of these procedures is solely the responsibility of THECB. Consequently, we make no representation regarding the sufficiency of the procedures described in the attached Schedule A, either for the purpose for which this report has been requested, or for any other purpose.

The agreed-upon procedures and the results are listed in the attached Schedule A.

We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the accounting records of Blinn College. 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 management of THECB and is not intended to be, and should not be, used by anyone other than those specified parties.

Clifton Gunderson LLP

Austin, Texas
November 16, 2010

Schedule A: Schedule of Agreed-Upon Procedures and Results

Procedure Step 1:

Describe the specific projects or activities the entity supported with THECB ARRA grant funds. State the amount of funds to be spent by category and any performance measures (such as hours worked, etc.) specified in the grant agreement.

Results of Step 1:

Blinn College used the grant funds to pay for consulting services provided to improve its technological infrastructure and upgrade its student information system. Its grant agreement with THECB states that the grant award is worth \$ 384,254 and the total amount is to be used on software and equipment for a new student portal that will enhance student and administrative efficiencies. There were no performance measures associated with this grant.

Procedure Step 2:

List any subawards the grantee has made using THECB ARRA grant funds.

Results of Step 2:

Blinn College did not make any subawards.

Procedure Step 3:

Fiscal and Programmatic Oversight:

- a. Verify that the entity has written procedures to ensure that it complies with the requirements of the Cash Management Improvement Act (CMIA).
- b. Verify that the entity's financial recordkeeping system provides for the segregation of THECB ARRA grant funds from other sources of funding.
- c. Has the THECB provided guidance to the entity regarding the reimbursement of THECB ARRA grant funds? If so, has the entity incorporated this guidance into its written policies and procedures in some fashion?
- d. Determine if the entity has written procedures to ensure compliance with the period of availability of federal funds requirements.
- e. Reconciliations:
 - i. Does the entity have written procedures to ensure that reconciliations of financial status reports to supporting documentation take place?
 - ii. Select two monthly/quarterly account reconciliations.
 - iii. Verify account reconciliations are performed in a timely manner (one week for monthly and two weeks for quarterly) and reconciliations are reviewed and approved.
 - iv. Verify reconciling items are identified, investigated and resolved in a timely manner (one week for monthly and two weeks for quarterly).
 - v. Verify that reports from the accounting system exist to support each balance for these account reconciliations.
 - vi. Verify that financial status reports are supported by documentation that reconciles to the general ledger and monthly reimbursement vouchers.

- f. Comparison of Data:
 - i. Verify whether the entity produces reports, such as comparison of budget to actual, to ensure that THECB ARRA grant funds will be spent within the grant period in accordance with the approved schedule and budget, and provides them to appropriate management for review on a timely basis.
- g. Obtain a copy of the entity's most recent single audit report and:
 - ii. Describe any significant or material internal control weaknesses or other findings.
 - iii. Describe what actions entity management asserts it is taking to address those findings.

Results of Step 3: Fiscal and Programmatic Oversight:

- a. Blinn College has general written procedures for its financial and grant management processes, but they do not directly address the requirements of CMIA. We verified that Blinn College's financial recordkeeping system allows for the segregation of THECB ARRA grant funds from other sources of funding.
- b. Blinn College has a financial system of record that requires separate department numbers for grant funds that allows for separate reporting of grant funds to ensure that the funds are expended in accordance with the time period required and in the amount that was budgeted according to the grant award. However, Blinn College did not actually segregate the ARRA grant funds from other sources of funding for the project, which had multiple sources of funding.
- c. THECB has provided guidance to Blinn College regarding the reimbursement of THECB ARRA grant funds. This guidance can be found on its website at: www.thecb.state.tx.us/ARRA. Blinn College already had guidance in its policies and procedures regarding reimbursement and these policies and procedures appear to incorporate THECB's guidance.
- d. Blinn College has written procedures to ensure compliance with the period of availability of federal funds requirements.
- e. Blinn College has written procedures for reconciling grant financial information to the general ledger, but not to supporting documentation. As a result, we were not able to perform the procedures set out in steps 3. e.ii. through e.v. However, in completing procedure e.vi., we identified that all ARRA grant monies were reimbursed in two payments. The \$384,254 grant award announcement was made in October 2009, the money was expensed by Blinn College from October to February of 2010, and Blinn College was reimbursed \$275,686.11 by THECB on February 12, 2010 and \$108,567.89 by THECB on March 23, 2010. We were able to reconcile all ARRA grant reimbursements to supporting documentation and to the general ledger in our testing performed in procedure step 5.
- f. We verified that Blinn College produces reports to ensure that grant funds will be spent within the grant period in accordance with the approved schedule and budget, and provides them to appropriate management for review on a timely basis.
- g. We obtained a copy of the entity's most recent single audit report that was released as a part of the 2009 Combined Annual Financial Reports. No significant or material internal control weaknesses or other findings were reported.

Procedure Step 4:

Subawards: If the organization has provided subawards to other entities in support of the THECB ARRA grant award:

- a. Determine whether the entity has written procedures to verify the eligibility of sub-recipients.
- b. Determine whether all applicable federal laws and grant terms were included in the sub-award grant contract.
- c. Determine if the entity established written monitoring procedures to cover this tier of responsibilities and compliance.
- d. Test to determine if subaward monitoring has taken place in accordance with those procedures.

Results of Procedure Step 4:

We were unable to perform the procedures described in Step 4 because Blinn College did not make any subawards.

Procedure Step 5: Testing of purchases of goods or services:

If the entity has made purchases (or goods or services):

- a. Verify whether the entity has written procedures to:
 - i. Ensure compliance with relevant federal and state procurement and contracting laws and regulations.
 - ii. Ensure that activities are allowable.
 - iii. Ensure that costs are allowable.
 - iv. Ensure that the purchases comply with procurement standards for suspension and debarment.
 - v. (If applicable) Ensure that the purchases comply with real property acquisition and relocation assistance requirements.
 - vi. (If applicable) Ensure that the purchases comply with Buy American provisions of the ARRA law.
 - vii. (If applicable) Ensure that vendors are compliant with the provisions of the Davis-Bacon Act.
- b. Select a sample of 5 expenditure transactions for each category of purchases (by budget line item).
- c. For each budget line item sample, test the following:
 - i. Is the expenditure allowable (as an activity and/or cost) under federal guidelines?
 - ii. Is the expenditure in accordance with grant provisions?
 - iii. Is it recorded in the proper accounting period (the period in which the transaction occurred)?
 - iv. Is it recorded to the correct account and program?
 - v. Is the transaction described in sufficient detail to permit the proper classification?
 - vi. Is documentation maintained to permit the tracing of funds to a level of detail that establishes that the funds have been used in compliance with grant requirements?
 - vii. If the expenditure was paid for out of multiple sources of funds, are the sources adequately identified for each fund application?
 - viii. If Buy American provisions apply, was the expenditure made in accordance with these provisions?
 - ix. Note any exceptions identified during testing.

- d. If the entity has purchased inventory or equipment:
 - i. Verify that the entity has written procedures to ensure that it:
 - 1. Maintains adequate property records (description, acquisition information, cost, estimated useful life, depreciation, location, disposition (condition, sale records, etc.),
 - 2. Safeguards against loss, theft, or damage,
 - 3. Values the items properly, and
 - 4. Keeps items in good working condition through repair and maintenance.
 - ii. Obtain an inventory report for all inventory or equipment purchased with THECB ARRA grant funds.
 - iii. Select 10 items (or the population if less than 10) and verify that the items are located where the inventory report indicates.

Results of Procedure Step 5:

- a. Blinn College does have written administrative procedures and a policy manual to ensure compliance with federal and state procurement and contracting laws. These procedures address the allowability of activities and costs, but do not address suspension and debarment. Requirements for real property acquisition and relocation assistance, Buy American provisions, and the Davis-Bacon Act were not applicable to this grant.
- b. Blinn College made all purchases in a single budget category and only consulting services were purchased. We verified there was supporting documentation for all services purchased under this grant.
- c. We found that this expenditure is allowable under federal guidelines, in accordance with grant provisions, and is recorded in the proper accounting period. The journal entry and general ledger support show that the expenditure is recorded to the correct account and program and is described in sufficient detail to permit the proper classification. We found that documentation maintained permitted the tracing of funds to a level of detail that established that the funds have been used in compliance with grant requirements. Buy America provisions were not applicable to this grant. We noted no exceptions during our testing.
- d. Blinn College used the ARRA funds to pay for consulting services, therefore, we were unable to perform the procedures under Step 5. d.

Procedure Step 6: Testing of salaries

If the entity has used THECB ARRA grant funds to pay salaries, select a sample of 10 personnel (or the population if less than 10) for two pay periods and verify that these personnel worked sufficient hours to earn the salaries paid for with THECB ARRA grant funds.

Results of Procedure Step 6:

We were unable to perform the procedures described in Step 6 because Blinn College did not use any ARRA grant funds to pay salaries.

Procedure Step 7: Verify monthly performance reports

Test of Monthly Performance Reports:

- a. Select the two most recent monthly performance reports for testing.
- b. Verify that sufficient documentation exists to support the actual hours worked as reported in those performance reports.

Results of Procedure Step 7:

As noted in Step 1 above, Blinn College did not report any performance metrics, as there were no performance measures associated with this grant.

Procedure Step 8: Verify financial reports:

Verify financial reports:

- a. Select the two most recent financial reports to THECB for testing.
- b. Verify that sufficient documentation exists to support the financial results reported and that any discrepancies were identified and corrected appropriately (i.e., verify that the reconciliations described in procedures above occurred as described and were conducted properly).

Results of Procedure Step 8:

All of the recent financial reports provided by Blinn College to THECB to support its ARRA grant were collected for testing. As part of our testing in Step 5, we confirmed that there was sufficient documentation to support the financial results reported and no discrepancies were identified.