



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

**South Texas College**

**Independent Accountant's Report  
On Applying Agreed-Upon Procedures  
December 9, 2010**

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**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 South Texas College's (STC) 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 STC. 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  
December 9, 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:

STC used the grant funds to pay salaries to 11 temporary fulltime instructors to teach sections of regular course offerings. The grant agreement with THECB states that the grant award is worth \$ 497,575.00, and the total amount is to be used for Working Capital – Personnel. The performance measure listed is for hours worked, in support of THECB’s calculation of jobs created and retained.

### Procedure Step 2:

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

### Results of Step 2:

STC did not make any subawards and we were therefore unable to perform Procedure Step 2.

### 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. We verified that STC has written procedures to ensure that it acts in compliance with the requirements of CMIA. Although CMIA is not specifically referenced, STC's procedures address cash management and record keeping.
- b. We verified that STC's financial recordkeeping system provides for the segregation of THECB ARRA grant funds from other sources of funding.
- c. THECB has provided guidance to STC regarding the reimbursement of THECB ARRA grant funds. This guidance can be found on its website at [www.thecb.state.tx.us/ARRA](http://www.thecb.state.tx.us/ARRA). Although STC's procedures do not directly reference THECB's guidance, it already had guidance in its policies and procedures for tasks to be performed when requesting, budgeting, receiving, and expending federal grant monies.
- d. We verified that STC has written procedures to ensure compliance with the period of availability of federal funds requirements, via requirements and assignment of responsibility to ensure compliance with the terms and conditions of the funding source of grants.
- e. Our results for Procedure Step 3e:
  - i. We verified that STC has written procedures to ensure that periodic reconciliations of financial status reports to supporting documentation are performed. The \$497,575 grant award was made in January 2010 and STC was reimbursed by THECB in seven payments extending from January through August, 2010.
  - ii. We selected the months of October 2009 (the start of the period of performance) and January 2010 for review.
  - iii. We verified that reconciliations were performed in a timely manner (monthly).
  - iv. We found that there were no reconciling items identified and therefore none to be investigated and resolved.
  - v. We verified that reports from the Accounting system existed to support each balance for these account reconciliations.
  - vi. We verified that financial status reports are supported by documentation that reconciles to the general ledger and monthly reimbursement vouchers.
- f. We verified that STC 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. STC also has a written policy that specifies the Grants Office and Compliance Specialist jointly review the reconciled ARRA fund monthly expenditures prior to the generation of a reimbursement request.
- 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 Report. 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:

STC did not make any sub-awards and so we were unable to perform Procedure Step 4.

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.
- a. Select a sample of 5 expenditure transactions for each category of purchases (by budget line item).
- b. 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.

- c. 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:

STC used all the ARRA funds to pay salaries and did not purchase any goods or services, so we were unable to perform Procedure Step 5.

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:

Of the 11 personnel whose salaries were funded by the THECB ARRA grant funds, we selected 10 employees for payroll testing during all pay periods from October 2009 to August 2010. We found that the amounts paid to all 10 employees with ARRA grant funds agreed to the amounts reported to the THECB. These salaries were paid to temporary fulltime faculty members who taught classes during the 2009-2010 school year. Faculty members were paid monthly during the months of October 2009 through August 2010.

We verified that personnel worked sufficient hours to earn the salaries paid for with THECB ARRA grant funds by matching the number of lecture hours for which the faculty were responsible to the Fall 2009, Spring 2010, and Summer 2010 course listings posted on the STC website. We then verified that the classes were indeed taught by the faculty members by matching the grade reports for the section the employee was hired to teach. In this manner, we verified that the personnel worked sufficient hours to earn the salaries paid with THECB ARRA grant funds.

Most colleges do not require faculty to submit timesheets, and timesheets are not required by the THECB ARRA grant. The faculty members were paid based on the number of credit hours they taught, with classroom hours calculated for each month ARRA funds were used to pay them.

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:

The two most recent monthly performance reports provided by STC to THECB to support their ARRA grant were selected for testing which included the report for August 2010 and the final report for the entire grant period of October 1, 2009 to August 31, 2010. Only the August report included hours worked, as the October report was the final closeout report. We verified the hours reported were calculated correctly for the ARRA funds expended in support of those salaries. See the results for Step 6 for the support provided and verification for the actual hours worked.

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:

We verified that sufficient documentation existed to support the financial results reported in the two most recent monthly financial reports provided by STC to THECB which included the report for August 2010 and the final report for the entire grant period of October 1, 2009 to August 31, 2010. There were no discrepancies to identify and correct. The reimbursement reports reconciled with the salaries paid to the temporary full-time instructors.