



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

South Plains College

**Independent Accountant's Report
On Applying Agreed-Upon Procedures
December 15, 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 Plains College's (South Plains) 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 the 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 South Plains. 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 15, 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:

South Plains used the grant funds to pay for the instructional costs of faculty to teach THECB-approved courses. Its grant agreement with THECB states that the grant award is worth \$248,645, 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:

South Plains did not make any subawards. Therefore, we were unable to complete the procedures in 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 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:
 - i. Describe any significant or material internal control weaknesses or other findings.
 - ii. Describe what actions entity management asserts it is taking to address those findings.

Results of Step 3: Fiscal and Programmatic Oversight:

- a. South Plains does not have written procedures to ensure that it complies with the requirements of CMIA.
- b. We verified that South Plains' financial recordkeeping system provides for the segregation of THECB ARRA grant funds from other sources of funding. South Plains has a financial system of record that requires separate tracking 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.
- c. THECB has provided guidance to South Plains regarding the reimbursement of THECB ARRA grant funds. This guidance can be found on its website at: www.thecb.state.tx.us/ARRA. South Plains does not have written procedures in which this guidance is incorporated.
- d. South Plains does not have written procedures to ensure compliance with the period of availability of federal funds requirements.
- e. South Plains does not have written procedures to ensure that reconciliations of financial status reports to supporting documentation take place. South Plains does not reconcile all of its accounts monthly. Thus, we were unable to perform Steps 3.e.ii-v. However, to complete Step 3.e.vi., we were able to verify that financial status reports are supported by documentation that did reconcile to the general ledger and the monthly reimbursement vouchers as part of our testing in Step 6.
- f. We verified that South Plains 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. South Plains produced monthly status reports that it submitted to THECB, which tracked the total amount of the grant, the amount reimbursed to date, and the current period activity.
- g. We obtained a copy of the entity's most recent single audit report. South Plains received an unqualified opinion. 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 set forth in Step 4 because South Plains 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 five 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:

South Plains did not purchase any goods or services with THECB ARRA grant funds. As a result, we could not perform the procedures described in Step 5 above.

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 selected all five of the personnel whose salaries were funded by the THECB ARRA grant funds for payroll testing during the months of November 2009 and April 2010. Four faculty salaries were paid for 100 percent with ARRA funds and 94 percent of one faculty salary was reimbursed with ARRA funds. We found that the amounts paid to all five employees paid with ARRA grant funds agreed to the amounts reported to the THECB. These salaries were paid to faculty members who taught classes during the fall semester of 2009 and the spring semester of 2010.

We verified that personnel worked sufficient hours to earn the salaries paid for with THECB ARRA grant funds by matching the class schedule and employment agreements for the sections 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 reports submitted to THECB were for August 2010 and September 2010. We verified that sufficient documentation existed to support the hours worked as reported. See the results for Procedure Step 6 relating to verification of sufficient hours worked in compliance with the grant requirements.

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:

The two most recent monthly reports submitted to THECB were for August 2010 and September 2010. We verified that sufficient documentation existed to support the expenditures South Plains reported. No discrepancies were identified.