ORANGEBURG-CALHOUN TECHNICAL COLLEGE STATE LOTTERY PROGRAMS ORANGEBURG, SOUTH CAROLINA

Independent Accountants' Report On Applying Agreed-Upon Procedures June 30, 2023

ORANGEBURG-CALHOUN TECHNICAL COLLEGE STATE LOTTERY PROGRAMS

For the Year Ended June 30, 2023

Table of Contents

Independent Accountants' Report On Applying Agreed-Upon Procedures	1-6	
Reviewer's Findings	7	

MEMBERS AMERICAN INSTITUTE OF CPAS

PRIVATE COMPANIES PRACTICE SECTION

SOUTH CAROLINA ASSOCIATION OF CPAS

GOVERNMENTAL AUDIT QUALITY CENTER

CLINE BRANDT KOCHENOWER

& Co., P.A.

Certified Public Accountants

Established 1950

ALBERT B. CLINE, CPA (1923-2013)
RAYMOND H. BRANDT, CPA

Ben D. Kochenower, CPA, CICA, CGMA TIMOTHY S. BLAKE, CPA/PFS BRANDON A. BLAKE, CPA LAURA S. ARANGO, CPA JONATHAN CRUZ, CPA

Independent Accountants' Report On Applying Agreed-Upon Procedures

Dr. Walt Tobin President, Orangeburg-Calhoun Technical College 3250 St. Matthews Road Orangeburg, SC 29118

Bryce Wilson, CPA Commission on Higher Education

We have performed the procedures enumerated below for Orangeburg-Calhoun Technical College's State Lottery programs disbursed by the Commission on Higher Education (CHE) as of June 30, 2023. Orangeburg-Calhoun Technical College's management is responsible for compliance with state requirements for the state lottery programs.

CHE has agreed to and acknowledges that the procedures performed below are appropriate to meet the intended purpose which is to assist CHE in evaluating whether Orangeburg-Calhoun Technical College's state lottery programs are in compliance with state requirements. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report, may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings are as follows:

We obtained the population of the state lottery programs disbursed by CHE from Orangeburg-Calhoun Technical College to select a sample of students for each program. For the year ended June 30, 2023, the institution had disbursements to students in the following programs:

State Lottery Programs Disbursed by CHE	June 30, 2023	
SC LIFE Scholarship	Yes	
SC National Guard College Assistance Program	Yes	
SC Need-based Grant	Yes	

We obtained the student file for each student selected and performed procedures for eligibility requirements as prescribed in the four areas of: Initial eligibility and continued eligibility, records, retention, and award amount based on the specified laws, regulations, and contracts.

The result of those procedures are as follows:

		Exceptions
State Lottery Program Disbursed by CHE	Sample Size	Noted
SC LIFE Scholarship	14	2
SC National Guard College Assistance Program	1	None Noted
SC Need-based Grant	25	None Noted

SC LIFE Scholarship – 62-1200.1 – 62-1200.75

 We obtained and documented proof of SC residency and US Citizenship at the time of high school graduation and College enrollment and proof of South Carolina residency of the parent or guardian for dependent students.

We found no exceptions as a result of this procedure.

2. We obtained financial aid records and documented the signing of the required attestation affidavit for each academic year.

We found no exceptions as a result of this procedure.

3. We obtained the student's final high school transcript signed by the school official and documented the graduation date, SC UGPA, ACT/SAT score, and class ranking.

Finding: We found two exceptions. Our finding as a result of the procedure performed is presented on the Reviewer's Findings section of the report.

- 4. For transferring students, we obtained the academic transcripts to verify the following criteria:
 - Recipient earned a cumulative LIFE GPA of 3.0 or higher and
 - Recipient met the annual credit hour requirements based on the initial enrollment date:
 - Second year transfer 30 non-remedial credit hours (or equivalent)
 - o Third year transfer 60 credit hours (or equivalent)
 - o Fourth year transfer 90 credit hours (or equivalent)

We found no exceptions as a result of this procedure.

5. We obtained the FINAL official transcript and verified that the date calculated was between 3 days prior to the date of the high school graduation and no later than June 15th. Covid-19 waivers were taken into consideration, if applicable.

We found no exceptions as a result of this procedure.

- 6. We obtained and evaluated the institutional academic transcript and documented the initial enrollment date, initial eligibility date, student's academic classification, academic term, credits earned and LIFE GPA to verify that the student met the continued eligibility criteria:
 - Earned a cumulative Life GPA of 3.0 or higher by the end of the academic year.
 - Received the award in one of eight consecutive terms from the time of initial enrollment.
 - Met the annual credit hour requirement based on initial college enrollment date:
 - Second year 30 non-remedial credit hours (or equivalent)
 - o Third year 60 credit hours (or equivalent)
 - o Fourth year 90 credit hours (or equivalent)

SC LIFE Scholarship – 62-1200.1 – 62-1200.75, Continued

7. We recalculated the student LIFE GPA and compared it to the institution's calculation.

We found no exceptions as a result of this procedure.

8. We obtained proof of full-time enrollment and documented any remedial or developmental courses taken.

We found no exceptions as a result of this procedure.

9. We agreed the student's awarding documentation to the awarding information in CHE's AS400 (CHEMIS).

We found no exceptions as a result of this procedure.

10. We obtained the financial aid record and documented the LIFE award amount to verify that the annual grant amount was not exceeded.

We found no exceptions as a result of this procedure.

11. We obtained the financial aid awarding and disbursing records to verify that the cost of attendance (COA) was not exceeded.

We found no exceptions as a result of this procedure.

12. We traced the disbursements to the student's account history from the business office.

We found no exceptions as a result of this procedure.

13. We obtained and documented award notifications to determine if scholarship terms and conditions were provided.

We found no exceptions as a result of this procedure.

14. We obtained the student account history and verified that the student did not receive Palmetto Fellows scholarship, HOPE scholarship, or Lottery Tuition Assistance during the same award year.

We found no exceptions as a result of this procedure.

SC National Guard College Assistance Program - 62-250 - 62-262

1. We obtained proof of student eligibility from CHE.

We found no exceptions as a result of this procedure.

- 2. We obtained the total lifetime award from CHE to ensure that the total lifetime maximum was not exceeded.
 - Army NG \$5,500 max per academic year
 - Air NG \$11,000 max per academic year (AIR National Guard recipients may receive up to a maximum of \$11,000 per academic year if enrolled in a two-year program at two-year or four-year eligible SC Institutions OR a maximum of \$5,500 at eligible SC four-year Institutions per academic year).
 - Lifetime max \$22,000

SC National Guard College Assistance Program - 62-250 - 62-262, Continued

3. We obtained the student's institutional transcript to verify that the amount disbursed agreed to the student's enrollment status.

We found no exceptions as a result of this procedure.

4. We obtained evidence that the student was making satisfactory academic progress as defined by the institution.

We found no exceptions as a result of this procedure.

5. We obtained evidence that the student was enrolled in a degree-seeking program.

We found no exceptions as a result of this procedure.

6. We traced the disbursements to the student's account history from the business office and verified that ROTC scholarship funds were not disbursed to the student.

We found no exceptions as a result of this procedure.

7. We obtained the student's financial aid file and documented the cost of attendance (COA) and all other gift aid to verify that COA was not exceeded.

We found no exceptions as a result of this procedure.

8. We agreed the student's awarding documentation to the awarding information in CHE's AS400 (CHEMIS).

We found no exceptions as a result of this procedure.

SC Need-based Grant - 62-450 - 62-505

1. We obtained financial records and documented proof of US Citizenship, South Carolina residency, and in-state tuition qualification.

We found no exceptions as a result of this procedure.

2. We obtained financial aid records and documented the signing of the required attestation affidavit for each academic year.

We found no exceptions as a result of this procedure.

3. We obtained proof that the student filed the Free Application for Federal Student Aid (FAFSA) and completed the process to determine eligibility for federal student aid each academic year.

We found no exceptions as a result of this procedure.

4. We obtained the Institutional Student Information Record (ISIR) to verify that the student had not received a baccalaureate degree.

We found no exceptions as a result of this procedure.

5. We obtained evidence that the student was determined to be "needy" based on Title IV regulations for determining financial aid.

SC Need-based Grant - 62-450 - 62-505, Continued

6. We obtained evidence that the student was enrolled in a degree seeking program.

We found no exceptions as a result of this procedure.

7. We obtained evidence that the student enrolled and attended or had completed at the time of the grant disbursement in a minimum of six credit hours if part-time for the semester or twelve credit hours if full-time for the semester.

We found no exceptions as a result of this procedure.

8. For first-time applicants with previous credit hours, we obtained the credit hours and GPA to verify that the student earned at least a 2.0 cumulative GPA.

We found no exceptions as a result of this procedure.

- 9. We obtained the institutional transcript and the satisfactory academic progress evaluation to verify that the student maintained continued eligibility for the SC Need-based Grant, once enrolled as follows:
 - Completed a minimum of six credit hours if part-time for the semester or twelve credit hours if full-time for the semester.
 - Made satisfactory academic progress toward a degree as determined by the institution.

We found no exceptions as a result of this procedure.

10. We obtained the students' financial aid file to verify that maximum eligibility terms were not exceeded.

We found no exceptions as a result of this procedure.

- 11. We obtained the financial aid record to verify and document the following:
 - Award not to exceed the cost of attendance (Title IV methodology)
 - Award amounts not to exceed \$1,750 per eligible part-time student per academic year.
 - Award amounts not to exceed \$3,500 per eligible full-time student per academic year.
 - Award amounts not to exceed 50 percent of the annual award in any one term.

We found no exceptions as a result of this procedure.

12. We agreed the student's awarding documentation to the awarding information in CHE's AS400 (CHEMIS).

We found no exceptions as a result of this procedure.

Other Procedures

1. We obtained the institution's current policies and procedures for monitoring lottery funded scholarships to ensure that the documents are readily available.

We found no exceptions as a result of this procedure.

2. We obtained and completed the CHEMIS variance analysis form with information provided by the institution and CHE to determine if the state lottery programs have been reconciled properly and in a timely manner.

Orangeburg-Calhoun Technical College State Lottery Programs

We were engaged by CHE to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the AICPA. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on State Lottery programs disbursed by CHE. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Orangeburg-Calhoun Technical College and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of CHE and Orangeburg-Calhoun Technical College and is not intended to be and should not be used by anyone other than those specified parties.

Cleme Brandl Kochensner July 25, 2024

Gaffney, SC

Reviewer's Findings

LIFE Scholarship

Based on a sample of fourteen (14) students

<u>Condition</u>: During our review of the LIFE scholarships awarded during the 2022-2023 academic year, we found two instances where the final high school transcript used to determine initial eligibility was not valid for scholarship awarding purposes.

<u>Criteria</u>: 62-900.135 (B) states, "...all eligible institutions that participate in the program must abide by program policies, rules, or regulations..."

In order to determine eligibility for the State scholarship programs, the institution must have a final and official transcript on file demonstrating, but not limited to, the following items:

- A valid signature (electronic or otherwise) from the principal. In the event that the principal is not available, the Superintendent signature is acceptable. For Independent/Private and home school students: The administrator, registrar, or an official from the home school/accountability group. Should provide a letter stating the designated school representative.
- SC UGP GPA: must be demonstrated.
- Calculation Date: All final official transcripts must be date calculated between the date of the high school
 graduation and no later than June 15th (regardless of academic year). For the LIFE Scholarship and the
 Palmetto Fellows Scholarship Late Award the transcript MUST demonstrate that it is the final official
 transcript, as well as reflect a graduation date.
- Rank: If an independent high school or home school association has an approved policy on rank, a rank
 must be demonstrated on the official transcript (even if the student is not using rank for scholarship
 eligibility). A rank report must also be submitted with a date calculated matching the transcripts even if
 the student is not using rank. (LIFE 62-1200.10.C)

<u>Cause:</u> For both students, the transcript provided included the South Carolina Uniform Grading Policy GPA or "SC UGP" GPA, the graduation date, and a valid signature from the principal or superintendent. However, one transcript exceeded the calculated date of June 15th, and the other transcript did not indicate a calculation date.

Student No. 1 – Calculation date: June 16, 2022

Student No. 2 – Graduation date: May 23, 2022

Calculation date: None noted

<u>Effect:</u> The institution misawarded \$5,000 to each student before obtaining a valid high school transcript for scholarship awarding purposes. The institution subsequently obtained updated valid transcripts for both students.

Recommendation: We recommend the institution evaluate all functional areas that impact how and when initial eligibility is determined and identify weaknesses that increase the risk of incorrect awarding and disbursing.

<u>Management Response:</u> To ensure that transcripts are thoroughly reviewed prior to making an award, we have updated our processes for reviewing of transcripts to include the Scholarship Coordinator's review and an additional staff's review. Since our process for reviewing transcripts is a manual process, we, felt that the additional check would ensure that we are receiving transcripts with a calculated date between the date of high school graduation and with a date no later than June 15th.