

Independent Accountants' Report on
Applying Agreed-Upon Procedures

St. Joseph's Catholic School
100 St. Joseph's Drive
Greenville, South Carolina 29607

We have performed the procedures as outlined in the Agreed Upon Procedures for Eligible School Compliance Audit as recommended by the Advisory Committee created pursuant to Provision 1.80 of Act 286 2014. These procedures were agreed to by the management of St. Joseph's Catholic School. This engagement to apply agreed upon procedures was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the management of St. Joseph's Catholic School. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are detailed in the procedures checklist attached to this report.

We were not engaged to, and did not perform an audit, the objective of which would be an expression of an opinion on the specified elements, accounts, or items. 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 use of the management of St. Joseph's Catholic School and specified users as approved by the School's management and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes.

McKinley, Cooper & Co., LLC

Greenville, South Carolina
May 7, 2015

STATE OF SOUTH CAROLINA
SECRETARY OF STATE

INDEPENDENT SCHOOL COMPLIANCE AUDIT

TYPE OR PRINT CLEARLY IN BLACK INK.

Pursuant to Part 1B, Section 1.80 of the 2014-2015 Appropriations Act, the undersigned organization hereby submits its compliance audit to the Secretary of State;

1. List the name, address, phone number and web address (if applicable) of the independent school:

St Joseph's Catholic School, Inc
Name
100 St Joseph's Drive
Street Address
Greenville Greenville SC 29607
City County State Zip Code
864-234-9009 www.sj catholic school.org
Phone Number Web Address

2. List the name, address, phone number and web address (if applicable) of the outside auditing firm that conducted the compliance audit:

McKinley Cooper & Co LLC
Name
555 North Pleasantburg Drive, Suite 225
Street Address
Greenville Greenville SC 29607
City County State Zip Code
Phone Number Web Address

3. The attached compliance audit is for the fiscal year beginning July 1, 2014
and ending June 30, 2015

Date 5/4/2015

St Joseph's Catholic School
Name of Organization
[Signature]
Signature of Officer
Ann M O'Dea, Chief Financial Officer
Type or Print Name and Title of Officer

FILING INSTRUCTIONS

1. THIS FORM MUST BE ACCOMPANIED BY A COMPLIANCE AUDIT COMPLETED WITHIN THE LAST THIRTY (30) DAYS.
2. If you would like a filed copy for your records, please submit two (2) copies of this form and two (2) copies of the attached compliance audit, along with a self-addressed, stamped envelope.

Return to: Secretary of State
ATTN: Legal Division
1205 Pendleton Street, Suite 525
Columbia, SC 29201

Agreed Upon Procedures for Eligible School Compliance Audit
As Recommended by the Advisory Committee
Created Pursuant to
Proviso 1.60, of Act 286 of 2014
Educational Credit for Exceptional Needs Children (ECENC) Program

School Name: St. Joseph's Catholic School, Inc.
Address: 100 St. Joseph's Drive
Greenville SC 29609

1. The school offers a general education to primary or secondary school students.

Yes No
Verification by Accreditation by SACS/Advanced ED D

Offering a general education to primary or secondary school students:
South Carolina Code of Regulations, 43-243. Special Education, Education of Students with Disabilities identifies "general education curriculum" as "the same curriculum as for nondisabled children." Documentation for item six may be used to demonstrate compliance.

2. The school does not discriminate on the basis of race, color, or national origin.

Yes No
Verification by IRS Form 990 Schedule E Nondiscrimination

Nondiscrimination on the basis of race, color, or national origin:
IRS Form 990 Schedule E, IRS Form 5578 or other similar federal filing demonstrates compliance.

3. The school is located in this State.

Yes No
Verification by real estate title - Greenville, SC

Location within this State: Either a title or deed; or county property tax bill demonstrates compliance.

4. The school has an educational curriculum that includes courses set forth in the state's diploma requirements and where the students attending are administered national achievement or state standardized tests, or both, at progressive grade levels to determine student progress.

Yes No
Verification by Curriculum Course Requirements, confirmation of PSAT/NMSQT, OLSAT, and KCS Pearson, Inc testing.

Educational curriculum that includes courses set forth in the state's diploma requirements and where the students attending are administered national achievement or state standardized tests, or both, at progressive grade levels to determine student progress:

Diploma Requirements (SC Code of Regulations 43-234) 1. Requirements for Earning a South Carolina High School Diploma. Include courses in English language arts; mathematics; science; U.S. History and Constitution; economics; U.S. Government; other social studies; physical education or Junior ROTC; computer science, foreign language or career and; technology education; electives. A school course offering, course directory or blank report cards listing the inclusion of courses demonstrates compliance.

Assessment tools include the PSAT, SAT, ACT, Stanford Achievement Test, TerraNova, Iowa Test of Basic Skills, and other similar test. Copies of test scores or confirmation of test grading from contractors or associations demonstrate compliance.

5. The school has facilities that are subject to applicable federal, state, and local laws.

Yes No
Verification by certificates of property tax exemption, Fire Marshall inspection, Use and Occupancy (Building safety Division)

Facilities that are subject to applicable federal, state, and local laws: Please note if school is NOT subject to such laws.

6. The school is a member in good standing of the Southern Association of Colleges and Schools, the South Carolina Association of Christian Schools or the South Carolina Independent Schools Association.

Yes No

Verification by See # 1 above

Good standing membership within Southern Association of Colleges and Schools (SACS / AdvancedED), the South Carolina Association of Christian Schools (SCACS) or the South Carolina Independent Schools (SCISA) A letter or certificate or other document issued by the association or accreditation entity communicating current membership status demonstrates compliance.

7. The school documents all individual grants received from each nonprofit scholarship funding organization on behalf of qualifying students with exceptional needs.

Yes No

Verification by copies of checks received from nonprofit scholarship organization, accounting records, student tuition records

8. The school has no knowledge or information suggesting that the grants awarded by each scholarship funding organization were contingent upon any prescribed conditions imposed by the scholarship funding organization upon the school.

Yes No

Verification by funding notification grant letter from scholarship funding organization

9. The school documents that each individual grant received was in the form of a check in the name of the qualifying student.

Yes No

Verification by copies of checks received from scholarship funding organization

10. The school documents that each individual grant received per qualifying child did not exceed \$10,000 per school year.

Yes No

Verification by copies of checks received

For issues 7. through 10. Grants received School should be able to provide copies of checks received from scholarship funding organizations for qualifying students with exceptional needs to document total revenues; to document that checks were properly prepared; and to document that no child received a grant in excess of \$10,000.

11. The school documents the enrollment dates for all qualifying children with exceptional needs who received a grant from a scholarship funding organization.

Yes No

Verification by attendance records

Enrollment data For all students receiving grants, a school should be able to document enrollment dates with copies of attendance records, letters of registration or withdrawal, etc.

12. Did any qualifying student who received a grant leave or withdraw from the school for any reason prior to the end of the semester or school year and did not re-enroll within thirty days?

Yes No

Verification by attendance records

If Yes is checked, the school documents that it returned a prorated amount of the grant to the scholarship funding organization based on the number of days the qualifying student was enrolled in the school during the semester or school year and within sixty days of the student's departure.

Yes No

Verification of NA

Student withdrawals For students who received grants and left before the end of the semester or year, the school must document through checks issued that the scholarship funding organization was reimbursed a prorated amount.

Acceptance Statement

The following outside entity or auditing firm confirms that the above school has provided documentation and verification of its compliance with the Educational Credit for Exceptional Needs Children (ECENC) program as outlined above.

Sheryl S. Medders Shareholder
Name Title
McKinley, Cooper + Co, LLC
555 North Pleasantburg Drive Greenville, SC 29607
Name Of Outside Entity Or Auditing Firm Address
Sheryl S. Medders - McKinley, Cooper + Co, LLC
Signature Date 5/7/15

By law, the compliance audit must be conducted by "an outside entity or auditing firm." The term "outside" implies a neutral or independent evaluation that is conducted by an individual or contractor who has no personal or professional conflict of interest and/or relationship with a scholarship organization or grant recipient. The school may contact the South Carolina Association of Christian Schools or the South Carolina Independent Schools for questions or assistance.

This compliance audit must be furnished with thirty days of its completion and acceptance to the Secretary of State and Department of Revenue which must be made available by them on their website for public review (H.2.). The compliance audit must

Secretary of State, ATTN: Legal Division, 1205 Pendleton Street, Suite 525 Columbia, SC 29201
and
Department of Revenue, ATTN: Ricky Taylor, Audit Services, 301 Gervais Street, Post Office Box 125, SC 29214



ST. JOSEPH'S
CATHOLIC SCHOOL

*Middle School and High School
College Preparatory Education*

May 7, 2015

McKinley, Cooper & Co., LLC
555 North Pleasantburg Drive
Suite 225
Greenville, SC 29607

In connection with the agreed-upon procedures engagement of St. Joseph's Catholic School for the purpose of assisting the School management to ascertain that the School has documented compliance with requirements that establish eligibility for funds available under Provision 1.80 of Act 286 of 2014, we confirm, to the best of our knowledge, belief, and all due diligence, the following representations made to you during your examination.

(1) We have made available to you:

- a. All available records relating to compliance with the Act.

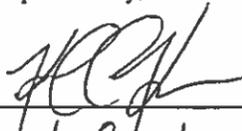
(2) There have been no:

- a. Irregularities involving management or employees who have significant roles in the system of internal control over record keeping.
- b. Irregularities involving other employees that could have a material effect on the record keeping practices.
- c. Communications from state agencies or other regulatory agencies concerning non-compliance with or deficiencies in record keeping practices.

(3) We have fully disclosed to you all information and documents requested by you and do not claim a privilege or other right to withhold any information or documents requested by you. Specifically, we have provided to you all documents and information requested.

Signed: _____

Title: _____


Headmaster