November 13, 2020

To the Retirement Committee
Non-Certificated Employees Retirement Plan
of the Community College District of St. Louis -
St. Louis County, Missouri
St. Louis County, Missouri

In planning and performing our audit of the financial statements of the Non-Certificated Employees Retirement Plan of the Community College District of St. Louis - St. Louis County, Missouri as of and for the year ended June 30, 2020, in accordance with auditing standards generally accepted in the United States of America, we considered the Plan’s internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Plan’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Plan’s internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies in internal control, such that there is a reasonable possibility that a material misstatement of the plan’s financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

In addition, during our audit, we noted certain other matters that we would like to bring to your attention. These matters are summarized as follows –

1. Administrative expenses paid by the Plan have not historically been approved prior to payment. We recommend that a member of management, other than the individual initiating the payment, formally approve expenses prior to payment and periodically compare expenses listed as paid in the State Street reports to expenses that were approved.
2. We recommend that a member of management periodically obtain a detailed listing of the Plan’s investments from State Street and review them to make sure they are in compliance with the Plan’s investment policy.

3. Minutes for some meetings of the Retirement Plan Committee were not completed in a timely manner or prior to our audit fieldwork. We recommend that all committee minutes be completed in a timely manner.

4. Although no issues were noted, we recommend a formal review take place to make sure that contributions remitted by the College and reflected in your payroll system reconcile to amounts received by State Street.

5. During our audit we noted a few instances where tax withholdings on lump-sum distributions differed slightly from our expectations. We recommend that management review withholdings being calculated by State Street before check disbursement occurs to ensure the amount being calculated is correct.

This communication is intended solely for the information and use of management, the Non-Certificated Employee Retirement Plan Committee, and others within the plan, and is not intended to be and should not be used by anyone other than these specified parties.

Sincerely,

KPM CPAs, PC
Springfield, MO