

CITY OF BEAUMONT

FEDERAL AND STATE SINGLE AUDIT REPORT

**For the Fiscal Year Ended
September 30, 2020**

CITY OF BEAUMONT
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**REPORT OF INDEPENDENT AUDITORS ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON
AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE
WITH *GOVERNMENT AUDITING STANDARDS***

To the Honorable Mayor and
Members of the City Council
City of Beaumont

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City of Beaumont (the “City”), as of and for the year ended September 30, 2020, and the related notes to the financial statements, which collectively comprise the City’s basic financial statements, and have issued our report thereon dated March 23, 2021.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the City’s internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City’s internal control. Accordingly, we do not express an opinion on the effectiveness of the City’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 a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity’s financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. 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.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the City’s financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

To the Honorable Mayor and
Members of the City Council
City of Beaumont

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Whitley Penn LLP

Houston, Texas
March 23, 2021

REPORT OF INDEPENDENT AUDITORS ON COMPLIANCE FOR EACH MAJOR FEDERAL AND STATE PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AND STATE AWARDS REQUIRED BY THE *UNIFORM GUIDANCE* AND THE *STATE OF TEXAS UNIFORM GRANT MANAGEMENT STANDARDS*

To the Honorable Mayor and
Members of the City Council
City of Beaumont

Report on Compliance for Each Major Federal and State Program

We have audited the City of Beaumont's (the "City") compliance with the types of requirements described in the U.S. Office of Management and Budget (OMB) *Compliance Supplement* and the *State of Texas Uniform Grant Management Standards* that could have a direct and material effect on each of the City's major federal and state programs for the year ended September 30, 2020. The City's major federal and state programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal and state statutes, regulations, and terms and conditions of its federal and state awards applicable to its federal and state programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the City's major federal and state programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), and the *State of Texas Uniform Grant Management Standards*. Those standards and the Uniform Guidance and the *State of Texas Uniform Grant Management Standards* require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal and state program occurred. An audit includes examining, on a test basis, evidence about the City's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal and state program. However, our audit does not provide a legal determination of the City's compliance.

To the Honorable Mayor and
Members of the City Council
City of Beaumont

Opinion on Each Major Federal and State Program

In our opinion, the City complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal and state programs for the year ended September 30, 2020.

Report on Internal Control Over Compliance

Management of the City is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the City's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal and state program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal and state program and to test and report on internal control over compliance in accordance with the Uniform Guidance and the *State of Texas Uniform Grant Management Standards*, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the City's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal and state program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal and state program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal and state program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance and the *State of Texas Uniform Grant Management Standards*. Accordingly, this report is not suitable for any other purpose.

Report on Schedule of Expenditures of Federal and State Awards Required by the Uniform Guidance and the State of Texas Uniform Grant Management Standards

We have audited the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City as of and for the year ended September 30, 2020, and the related notes to the financial statements, which collectively comprise the City's basic financial statements. We issued our report thereon dated March 23, 2021, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole.

To the Honorable Mayor and
Members of the City Council
City of Beaumont

The accompanying schedule of expenditures of federal and state awards is presented for purposes of additional analysis as required by the Uniform Guidance and the *State of Texas Uniform Grant Management Standards* and is not a required part of basic financial statements.

Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal and state awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

A handwritten signature in black ink that reads "Whitley Penn LLP". The signature is written in a cursive, flowing style.

Houston, Texas
March 23, 2021

CITY OF BEAUMONT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
For the Year Ended September 30, 2020

I. Summary of Auditors' Results

Financial Statements

Type of auditor's report issued	Unmodified
Internal control over financial reporting:	
Material weakness (es) identified?	No
Significant deficiency (ies) identified that are not considered to be material weaknesses?	None reported
Noncompliance material to the financial statements noted?	No

Federal Awards

Internal controls over major programs:	
Material weakness (es) identified?	No
Significant deficiency (ies) identified that are not considered to be material weaknesses?	None reported
Type of auditor's report issued on compliance for major federal programs:	Unmodified
Any audit findings disclosed that are required to be reported in accordance with section 2 CFR 200.516(a)?	No

Identification of Major Federal Programs:

<u>Name of Federal Program or Cluster</u>	<u>CFDA Number</u>
Special Supplemental Nutrition Program for Women, Infants and Children (WIC)	10.557
FY 2018 Port Security Grant Program	97.056
FY 2019 Port Security Grant Program	97.056
Coronavirus Relief Fund (COVID-19)	21.019

Dollar threshold used to distinguish Between Type A and Type B federal programs: \$908,096

Auditee qualified as low-risk auditee? Yes

CITY OF BEAUMONT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
For the Year Ended September 30, 2020

I. Summary of Auditors' Results (continued)

State Awards:

Internal control over major programs:

Material weakness(es) identified?	No
Significant deficiency(ies) identified that are not considered to be material weaknesses?	None reported
Type of auditors' report issued on compliance for major state programs:	Unmodified
Any audit findings disclosed that are required to be reported in accordance with the Uniform Grant Management Standards?	None

Identification of Major State Programs:

Name of State Program or Cluster

- Southeast Texas Auto Theft Task Force 2020
- Southeast Texas Auto Theft Task Force 2021

Dollar Threshold Considered Between Type A and Type B Programs	\$300,000
State Single Audit - Auditee qualified as low-risk auditee?	Yes

II. Financial Statement Findings

None Noted

III. Federal Award Findings and Questioned Costs

None Noted

IV. State Award Findings and Questioned Costs

None Noted

CITY OF BEAUMONT, TEXAS
SCHEDULE OF EXPENDITURES OF FEDERAL AND STATE AWARDS
For the Year Ended September 30, 2020

Federal Grantor/ Pass-Through Grantor/ Program or Cluster Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Passed Through to Subrecipients	Total Federal Expenditures
U.S. Department of Agriculture				
Passed Through the Texas Department of State Health Services:				
<i>Special Supplemental Nutrition Program for Women, Infants and Children (WIC)</i>	10.557	2017-049827-001A	\$ -	\$ 651,521
Total U.S. Department of Agriculture			-	651,521
U.S. Department of Commerce				
Direct Program(s):				
<u>Economic Development Cluster:</u>				
<i>Economic Adjustment Assistance Small Business Revolving Loan Fund</i>	11.307	08-39-02536	-	175,681
Total U.S. Department of Commerce			-	175,681
U.S. Department of Housing and Urban Development				
Direct Program(s):				
<u>CDBG - Entitlement Grants Cluster:</u>				
<i>Community Development Block Grants/Entitlement Grants</i>	14.218	B-17-MC-48-0003	3,685	4,330
<i>Community Development Block Grants/Entitlement Grants</i>	14.218	B-18-MC-48-0003	6,771	37,629
<i>Community Development Block Grants/Entitlement Grants</i>	14.218	B-19-MC-48-0003	226,924	590,999
<i>Community Development Block Grants/Entitlement Grants</i>	14.218	B-20-MC-48-0003	14,675	77,425
<i>Community Development Block Grants/Entitlement Grants (COVID-19)</i>	14.218	B-20-MW-48-0003	169,197	180,791
Total CDBG - Entitlement Grants Cluster			421,252	891,174
<u>HOME Investment Partnerships Program:</u>				
<i>HOME Investment Partnerships Program</i>	14.239	M-18-MC-48-0201	198,678	347,961
<i>HOME Investment Partnerships Program</i>	14.239	M-19-MC-48-0201	211,873	238,047
Total HOME Investment Partnerships Program			410,551	586,008
<i>Continuum of Care Program</i>	14.267	TX0219L6E071811	36,688	36,688
Total U.S. Department of Housing and Urban Development			868,491	1,513,870
U.S. Department of Justice				
Direct Program(s):				
<i>Asset Forfeiture</i>	16.000	N/A	-	44,479
<u>Edward Byrne Memorial Justice Assistance Grant:</u>				
<i>Edward Byrne Memorial Justice Assistance Grant (JAG) 2016</i>	16.738	2016-DJ-BX-0729	-	12,848
<i>Edward Byrne Memorial Justice Assistance Grant (JAG) 2017</i>	16.738	2017-DJ-BX-0332	-	6,053
<i>Edward Byrne Memorial Justice Assistance Grant (JAG) 2018</i>	16.738	2018-DJ-BX-0416	661	5,120
<i>Edward Byrne Memorial Justice Assistance Grant (JAG) 2019</i>	16.738	2019-DJ-BX-0566	42,216	71,801
Total Edward Byrne Memorial Justice Assistance Grant			42,877	95,822
<u>Coronavirus Emergency Supplemental Funding Program</u>				
<i>Coronavirus Emergency Supplemental Funding Program (COVID-19)</i>	16.034	2020-VD-BX-0748	-	260,512
<i>Coronavirus Emergency Supplemental Funding Program (COVID-19)</i>	16.034	2020-VD-BX-0002	-	3,465
Total Coronavirus Emergency Supplemental Funding Program			-	263,977
<i>Project Safe Neighborhood</i>	16.609	2018-GP-BX-0064	-	87,614
Total U.S. Department of Justice			42,877	491,892
U.S. Department of Transportation				
Direct Program(s):				
<u>Federal Transit Cluster:</u>				
<i>Federal Transit Formula Grants</i>	20.507	TX-2020-061-00	-	3,488,173
Passed Through Texas Department of Transportation:				
<u>Highway Planning and Construction Cluster:</u>				
<i>Highway Planning and Construction - Dowlen Road</i>	20.205	0920-38-189	-	132,594
<i>Highway Planning and Construction - 11th Street Resurfacing</i>	20.205	0920-38-260	-	850,240
<i>Highway Planning and Construction - Old Voth, Tram Road, Sherwood, Pine, Griffing, and Piney Point Lane</i>	20.205	20-245-204	-	1,364,851
Total Highway Planning and Construction Cluster			-	2,347,685
<u>Highway Safety Cluster:</u>				
<i>State and Community Highway Safety</i>	20.600	2019-Beaumont-S-1YG-00084	-	41,068
Total U.S. Department of Transportation			-	5,876,926

CITY OF BEAUMONT, TEXAS
SCHEDULE OF EXPENDITURES OF FEDERAL AND STATE AWARDS (continued)
For the Year Ended September 30, 2020

Federal Grantor/ Pass-Through Grantor/ Program or Cluster Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Passed Through to Subrecipients	Total Federal Expenditures
U.S. Department of Treasury				
Passed Through the Texas Department of Emergency Management:				
<i>Coronavirus Relief Fund (COVID-19)</i>	21.019	2020-CF-21019	-	6,587,900
Total U.S. Department of Treasury			<u>-</u>	<u>6,587,900</u>
U.S. Department of Health and Human Services				
Passed Through the Texas Health and Human Services Commission:				
<i>State Partnership Grant Program to Improve Minority Health</i>	93.296	STTMP151120-01-00	-	22,784
Passed Through the Texas Department of State Health Services:				
<u>Public Health Emergency Preparedness</u>				
<i>Public Health Emergency Preparedness</i>	93.069	537-18-0161-00001 - Amendment #2	-	97,384
<i>Public Health Emergency Preparedness</i>	93.069	537-18-0161-00001 - Amendment #3	-	29,653
Total Public Health Emergency Preparedness			<u>-</u>	<u>127,037</u>
<u>Project Grants and Cooperative Agreements for Tuberculosis</u>				
<u>Control Programs</u>				
<i>Project Grants and Cooperative Agreements for Tuberculosis Control Programs</i>	93.116	HHS000047300001 - Amendment #1	-	5,180
<i>Project Grants and Cooperative Agreements for Tuberculosis Control Programs</i>	93.116	HHS000047300001 - Amendment #2	-	14,414
Total Project Grants and Cooperative Agreements for Tuberculosis Control Programs			<u>-</u>	<u>19,594</u>
<u>Immunization Cooperative Agreements:</u>				
<i>Immunization Cooperative Agreements</i>	93.268	HHS000102200001 - Amendment #1	-	157,471
<i>Immunization Cooperative Agreements</i>	93.268	HHS000102200001 - Amendment #2	-	13,542
Total Immunization Cooperative Agreements			<u>-</u>	<u>171,013</u>
<u>Public Health Emergency Response Cooperative Agreement</u>				
<i>Public Health Emergency Response Cooperative Agreement (COVID-19)</i>	93.354	HHS0007767300001	-	91,199
<i>Public Health Emergency Response Cooperative Agreement</i>	93.354	HHS000371500004	-	2,487
Total Public Health Emergency Response Cooperative Agreement			<u>-</u>	<u>93,686</u>
<i>Preventative Health and Health Services Block Grant funded solely with Prevention and Public Health Funds (PPHF)</i>	93.758	HHS000485600031	-	85,533
<i>Cares Stimulus Act Relief Payment (COVID-19)</i>	93.498	HHS41818654442	-	63,805
Total U.S. Department of Health and Human Services			<u>-</u>	<u>583,452</u>
U.S. Department of Homeland Security				
Direct Program(s):				
<u>Port Security Grant Program:</u>				
<i>FY 2018 Port Security Grant Program</i>	97.056	EMW-2018-PU-00018-S01	-	1,599,586
<i>FY 2019 Port Security Grant Program</i>	97.056	EMW-2019-PU-00155-S01	-	792,114
Total Port Security Grant Program			<u>-</u>	<u>2,391,700</u>
Passed Through the Texas Department of Public Safety:				
<i>Disaster Grants - Public Assistance (Presidentially Declared Disasters)¹</i>	97.036	4332DRTXP0000001	-	11,886,993
<i>Emergency Management Performance Grant (EMPG)</i>	97.042	EMT-2020-EP-00004	-	37,162
<i>Homeland Security Grant Program</i>	97.067	EMW-2019-SS-00022-501	-	64,986
Total U.S. Department of Homeland Security			<u>-</u>	<u>14,380,841</u>
Institute of Museum and Library Services				
Passed Through the Texas State Library and Archives Commission:				
<i>Interlibrary Loan Lending Reimbursement Program</i>	45.310	LS-00-18-0044-18901395	-	7,773
Total Institute of Museum and Library Services			<u>-</u>	<u>7,773</u>
Total Federal Awards Expended			<u>\$ 911,368</u>	<u>\$ 30,269,856</u>

¹Amount of expenditures incurred in prior fiscal years is \$10,378,409.

CITY OF BEAUMONT, TEXAS
SCHEDULE OF EXPENDITURES OF FEDERAL AND STATE AWARDS (continued)
For the Year Ended September 30, 2020

State Granting Agency/Grant Program	Grant or Identifying Number	Passed Through to Subrecipients	Total State Expenditures
Texas Department of Transportation			
<i>State/Local Urban Transportation Grant Agreement</i>	STATE-U-2019-BEAUMONT-00126	\$ -	\$ 488,507
<i>Southeast Texas Auto Theft Task Force 2020</i>	608-20-1230100	175,337	487,148
<i>Southeast Texas Auto Theft Task Force 2021</i>	608-21-1230100	15,281	48,179
<i>Routine Airport Maintenance</i>	M1920BAMN	-	14,834
<i>CARES Act Airport Grant (COVID-19)</i>	20CRBAMNT	-	30,000
Total Texas Department of Transportation		190,618	1,068,668
Texas Department of State Health Services			
<i>Tuberculosis Prevention and Control - State (TB/PC-State)</i>	HHS000484100007	-	3,725
<i>Tuberculosis Prevention and Control - State (TB/PC-State)</i>	HHS000484100007 - Amendment #1	-	39,978
Total Texas Department of State Health Services		-	43,703
Attorney General of Texas			
<i>Chapter 59 Asset Forfeiture</i>	N/A	-	187,484
Total Attorney General of Texas		-	187,484
Texas Division of Emergency Management			
<i>Texas Infrastructure Resiliency Fund</i>	TDEM-4332	-	56,952
Total Texas Division of Emergency Management		-	56,952
Total State Awards Expended		190,618	1,356,807
Total Federal and State Awards Expended		\$ 1,101,986	\$ 31,626,663

CITY OF BEAUMONT

NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AND STATE AWARDS

For the Year Ended September 30, 2020

Note 1 - Summary of Significant Accounting Policies

The accompanying schedule of expenditures of federal and state awards (the “Schedule”) includes the federal and state grant activity of the City under programs of the federal and state government for the year ended September 30, 2020. The information in this schedule is presented in accordance with the requirements of the Office of Management and Budget (OMB) Uniform Guidance and UGMS. Because the schedule presents on a selected portion of the operations of the City, it is not intended to and does not present the financial position, changes in net position or cash flows of the City.

The City accounts for awards under federal and state programs in the General, Capital Projects, and Special Revenue governmental funds.

Expenditures reported on the Schedule are reported on the modified accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the OMB Circular A-87, *Cost Principles for State, Local and Indian Tribal Governments*, or the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Negative amounts, if any, shown on the Schedule represent adjustments or credits made in the normal course of business to amounts reported as expenditures in prior years. Pass-through entity identifying numbers are presented where available.

Note 2 - De Minimis Cost Rate

The City has elected not to use the 10 percent de minimis indirect cost rate allowed under the Uniform Guidance.

Note 3 - Federal Revolving Loan Program

The federal loan program listed is administered directly by the City. Balances and transactions relating to this program are included in the City’s basic financial statements. The federal portion of loans outstanding at the end of the fiscal year, plus cash and investment balances in the revolving loan fund and administrative expenses, are included in the federal expenditures presented in the Schedule. Figures used in this calculation are as shown below:

$$[\$4,912+ \$258,609+ \$0] \times [\$500,000 / \$750,000] = \$175,681$$

<u>CFDA Number</u>	<u>Program Name</u>	<u>Outstanding Balance at September 30, 2020</u>
11.307	U.S. Department of Commerce EDA - Small Business Revolving Loan Fund	\$4,912

Note 4 - Women, Infants and Children’s Program

The Women, Infants and Children’s program distributes Lone Star Cards as part of its operations. The number of cards on hand as of September 30, 2020 is 691. There is no monetary value to these cards until issued.

CITY OF BEAUMONT
SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS
For the Year Ended September 30, 2020

Federal regulations, Title 2 U.S. Code of Federal Regulations Section 200.511 states, “The auditee is responsible for follow-up and corrective action on all audit findings. As part of this responsibility, the auditee must prepare a summary schedule of prior audit findings.” The summary schedule of prior audit findings must report the status of the following:

- All audit findings included in the prior audit’s schedule of findings and questioned costs and
- All audit findings reported in the prior audit’s summary schedule of prior audit findings except audit findings listed as corrected.

I. Prior Audit Findings

None reported

CITY OF BEAUMONT
CORRECTIVE ACTION PLAN
For the Year Ended September 30, 2020

Federal regulations, Title 2 U.S. Code of Federal Regulations §200.511 states, “At the completion of the audit, the auditee must prepare, in a document separate from the auditor's findings described in §200.516 Audit findings, a corrective action plan to address each audit finding included in the current year auditor's reports.”

I. Corrective Action Plan

Not applicable