



CUSTER COUNTY

Financial Audit

For the fiscal year ended June 30, 2018

Cindy Byrd, CPA

State Auditor & Inspector

CUSTER COUNTY, OKLAHOMA FINANCIAL STATEMENT AND INDEPENDENT AUDITOR'S REPORT FOR THE FISCAL YEAR ENDED JUNE 30, 2018

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Cindy Byrd, CPA | State Auditor & Inspector

2300 N. Lincoln Blvd., Room 123, Oklahoma City, OK 73105 | 405.521.3495 | www.sai.ok.gov

December 8, 2020

TO THE CITIZENS OF CUSTER COUNTY, OKLAHOMA

Transmitted herewith is the audit of Custer County, Oklahoma for the fiscal year ended June 30, 2018. The audit was conducted in accordance with 19 O.S. § 171.

A report of this type can be critical in nature. Failure to report commendable features in the accounting and operating procedures of the entity should not be interpreted to mean that they do not exist.

The goal of the State Auditor and Inspector is to promote accountability and fiscal integrity in state and local government. Maintaining our independence as we provide this service to the taxpayers of Oklahoma is of utmost importance.

We wish to take this opportunity to express our appreciation for the assistance and cooperation extended to our office during our engagement.

Sincerely,

CINDY BYRD, CPA

OKLAHOMA STATE AUDITOR & INSPECTOR



Board of County Commissioners

District 1 – Wade Anders

District 2 – Kurt Hamburger

District 3 – Lyle Miller

County Assessor

Brad Rennels

County Clerk

Melissa Graham

County Sheriff

Kenneth Tidwell

County Treasurer

Janet Roulet

Court Clerk

Staci Hunter

District Attorney

Angela Marsee

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CUSTER COUNTY, OKLAHOMA FOR THE FISCAL YEAR ENDED JUNE 30, 2018





Cindy Byrd, CPA | State Auditor & Inspector

2300 N. Lincoln Blvd., Room 123, Oklahoma City, OK 73105 | 405.521.3495 | www.sai.ok.gov

Independent Auditor's Report

TO THE OFFICERS OF CUSTER COUNTY, OKLAHOMA

Report on the Financial Statement

We have audited the combined total—all county funds on the accompanying regulatory basis Statement of Receipts, Disbursements, and Changes in Cash Balances of Custer County, Oklahoma, as of and for the year ended June 30, 2018, and the related notes to the financial statement, which collectively comprise the County's basic financial statement as listed in the table of contents.

Management's Responsibility for the Financial Statement

Management is responsible for the preparation and fair presentation of this financial statement in accordance with the regulatory basis of accounting described in Note 1, and for determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statement in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on this financial statement based on our audit. We conducted our audit in accordance with 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statement. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statement.



We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As described in Note 1, the financial statement is prepared by Custer County using accounting practices prescribed or permitted by Oklahoma state law, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The effects on the financial statement of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraph, the financial statement referred to above does not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of Custer County as of June 30, 2018, or changes in financial position for the year then ended.

Unmodified Opinion on Regulatory Basis of Accounting

In our opinion, the financial statement referred to above presents fairly, in all material respects, the combined total of receipts, disbursements, and changes in cash balances for all county funds of Custer County, for the year ended June 30, 2018, in accordance with the basis of accounting described in Note 1.

Other Matters

Supplementary Information

Our audit was conducted for the purpose of forming an opinion on the combined total of all county funds on the financial statement. The accompanying schedule of expenditures of federal awards, as required by Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and the remaining supplementary information, as listed in the table of contents, are presented for purposes of additional analysis and is not a required part of the financial statement.

The schedule of expenditures of federal awards and the remaining supplementary information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statement. Such information has been subjected to the auditing procedures applied in the audit of the financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statement or to the financial statement itself, 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 awards and the remaining supplementary information is fairly stated, in all material respects, in relation to the financial statement.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 7, 2020, on our consideration of Custer County's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the

effectiveness of the County's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering Custer County's internal control over financial reporting and compliance.

CINDY BYRD, CPA

OKLAHOMA STATE AUDITOR & INSPECTOR

December 7, 2020



CUSTER COUNTY, OKLAHOMA STATEMENT OF RECEIPTS, DISBURSEMENTS, AND CHANGES IN CASH BALANCES—REGULATORY BASIS (WITH COMBINING INFORMATION) FOR THE FISCAL YEAR ENDED JUNE 30, 2018

	Beginning Cash Balances July 1, 2017	Receipts Apportioned	Transfers In	Transfers Out	Disbursements	Ending Cash Balances June 30, 2018
Combining Information:						
County General Fund	\$ 2,643,177	\$ 3,525,642	\$ -	\$ -	\$ 3,031,868	\$ 3,136,951
County Highway Fund	4,970,412	4,917,834	258,749	-	6,291,477	3,855,518
CBRI Cash Fund (County Bridge and Road Improvement)	547,138	228,136	-	-	395,159	380,115
Sales Tax Cash Fund	2,927,980	2,825,183	-	-	2,204,655	3,548,508
Capital Improvement Cash Fund	689,593	162,749	-	-	11,409	840,933
Custer County Health Department	316,501	546,310	-	-	295,690	567,121
Resale Property Fund	602,352	154,325	-	-	305,564	451,113
Custer County Local Emergency Planning Committee	32,522	43,400	-	-	54,708	21,214
Trash Cop Cash Fund	57	-	-	-	_	57
Courthouse/Jail Bond Fund	6,144	-	-	-	-	6,144
Treasurer Mortgage Tax Certification Fee	16,141	4,855	-	-	5,386	15,610
County Clerk Lien Fee	95,452	50,705	-	-	33,467	112,690
Assessor Revolving Fee	80,240	14,933	-	-	3,425	91,748
Assessor Visual Inspection Fund	17,509	83	-	-	-	17,592
Sheriff Fee Cash Fund	90,413	385,569	-	-	403,751	72,231
Sheriff Drug Enforcement/Donation Fund	54	5,000	-	-	-	5,054
Sheriff Training & Equipment Fund	56	-	-	-	-	56
Sheriff DARE	60	-	-	-	-	60
County Clerk Records Management Fee	80,169	43,720	-	-	20,121	103,768
Sheriff Jail Fund	2,566	6,031	-	-	5,127	3,470
Sheriff Commisary Fund	46,089	151,334	-	-	148,752	48,671
Free Fair	51,833	20,142	-	-	17,000	54,975
Flood Plain Cash Fund	5,002	1,125	-	-	982	5,145
Custer County Rural Fire Truck & Equipment	161,385	124,780	-	-	108,925	177,240
Custer/Washita Drug Court	3,477	660			4,137	
Combined Total - All County Funds	\$ 13,386,322	\$ 13,212,516	\$258,749	\$ -	\$ 13,341,603	\$ 13,515,984

1. Summary of Significant Accounting Policies

A. Reporting Entity

Custer County is a subdivision of the State of Oklahoma created by the Oklahoma Constitution and regulated by Oklahoma Statutes.

The accompanying financial statement presents the receipts, disbursements, and changes in cash balances of the total of all funds under the control of the primary government. The general fund is the county's general operating fund, accounting for all financial resources except those required to be accounted for in another fund, where its use is restricted for a specified purpose. Other funds established by statute and under the control of the primary government are also presented.

The County Treasurer collects and remits material amounts of intergovernmental revenues and ad valorem tax revenue for other budgetary entities, including emergency medical districts, school districts, and cities and towns. The cash receipts and disbursements attributable to those other entities do not appear in funds on the County's financial statement; those funds play no part in the County's operations. Any trust or agency funds maintained by the County are not included in this presentation.

B. Fund Accounting

The County uses funds to report on receipts, disbursements, and changes in cash balances. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain government functions or activities.

Following are descriptions of the county funds included as combining information within the financial statement:

<u>County General Fund</u> – accounts for the general operations of the government.

<u>County Highway Fund</u> – accounts for state, local, and miscellaneous receipts and disbursements for the purpose of constructing and maintaining county roads and bridges.

<u>CBRI Cash Fund (County Bridge and Road Improvement)</u> – accounts for state receipts and disbursements for the purpose of maintaining bridges and roads.

Sales Tax Cash Fund – accounts for the sales tax collected and spent on behalf of the following entities: General Government (50%); County Sheriff (30%); Rural Fire Departments (8%); OSU Extension Office (8%); Custer County Free Fair (4%).

<u>Capital Improvement Cash Fund</u> – accounts for use tax collections and disbursements for the improvements to the courthouse.

CUSTER COUNTY, OKLAHOMA NOTES TO THE FINANCIAL STATEMENT FOR THE FISCAL YEAR ENDED JUNE 30, 2018

<u>Custer County Health Department</u> – accounts for monies collected on behalf of the county health department from ad valorem taxes, state, and local revenues and disbursed for the operations of the health department.

<u>Resale Property Fund</u> – accounts for the collections of interest and penalties on delinquent taxes and disbursed as restricted by state statute.

<u>Custer County Local Emergency Planning Committee</u> – accounts for grants monies received for various grants filed for emergency services within the County.

<u>Trash Cop Cash Fund</u> – accounts for grant funds received and spent on eradication of trash in the rural areas of the County.

<u>Courthouse/Jail Bond Fund</u> – accounts for the excess proceeds from a 1982 bond issue that was to fund an addition to the courthouse for jail and courthouse offices.

<u>Treasurer Mortgage Tax Certification Fee</u> – accounts for the collection of fees by the Treasurer for mortgage tax certificates and the disbursement of the funds as restricted by state statute.

<u>County Clerk Lien Fee</u> – accounts for lien collections and disbursements as restricted by state statute.

<u>Assessor Revolving Fee</u> – accounts for the collection of fees for copies as restricted by state statute.

<u>Assessor Visual Inspection Fund</u> – accounts for the collection and expenditure of monies by the Assessor as restricted by state statute for the visual inspection program.

<u>Sheriff Fee Cash Fund</u> – accounts for the collection and disbursement of sheriff process service fees as restricted by state statute.

<u>Sheriff Drug Enforcement/Donation Fund</u> – accounts for donations received to purchase and maintain a drug dog.

<u>Sheriff Training & Equipment Fund</u> – accounts for the collections from the sale of unclaimed property and disbursed for the training and equipping of the County Sheriff's deputies.

<u>Sheriff DARE</u> – accounts for state grant funds disbursed for the purpose of drug education and awareness.

<u>County Clerk Records Management Fee</u> – accounts for fees collected for instruments filed in the County Clerk's office as restricted by state statute for preservation of records.

<u>Sheriff Jail Fund</u> – accounts for the County Sheriff's portion of the appearance bond fee assessed by the District Court and disbursed for the general operations of the jail as restricted by state statute.

<u>Sheriff Commissary Fund</u> – accounts for the collection of the sale of items to inmates and disbursements to purchase commissary goods from the vendor and to improve or provide jail services. Additionally, any surplus funds can be expended for administering expenses for training, equipment, travel or for capital expenditures.

<u>Free Fair</u> – accounts for the collection of rent of the fair building/grounds, and interest earned on investments and disbursed for the operations of the free fair organization.

<u>Flood Plain Cash Fund</u> – accounts for monies collected for flood plain permits and disbursed for flood plain training and certifications.

<u>Custer County Rural Fire Truck & Equipment</u> – accounts for the collection of use tax and disbursed for fire trucks and equipment for the rural fire departments within the County as authorized by Board of County Commissioners.

<u>Custer/Washita Drug Court</u> – accounts for monies collected from the Oklahoma Department of Mental Health and Substance Abuse Services and is disbursed for salaries of the drug court administration.

C. Basis of Accounting

The financial statement is prepared on a basis of accounting wherein amounts are recognized when received or disbursed. This basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred. This regulatory basis financial presentation is not a comprehensive measure of economic condition or changes therein.

Title 19 O.S. § 171 specifies the format and presentation for Oklahoma counties to present their financial statement in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP) or on a regulatory basis. The County has elected to present their financial statement on a regulatory basis in conformity with Title 19 O.S. § 171. County governments (primary only) are required to present their financial statements on a fund basis format with, at a minimum, the general fund and all other county funds, which represent ten percent or greater of total county revenue with all other funds included in the audit presented in the aggregate in a combining statement. However, the County has elected to present all funds included in the audit in the Statement of Receipts, Disbursements, and Changes in Cash Balances—Regulatory Basis.

D. Budget

Under current Oklahoma Statutes, a general fund and a county health department fund are the only funds required to adopt a formal budget. On or before the first Monday in July of each year, each officer or department head submits an estimate of needs to the governing body. The budget is approved for the respective fund by office, or department and object. The County Board of Commissioners may approve changes of appropriations within the fund by office or department and object. To increase or decrease the budget by fund requires approval by the County Excise Board.

E. Cash and Investments

For the purposes of financial reporting, "Ending Cash Balances, June 30" includes cash and cash equivalents and investments as allowed by statutes. The County pools the cash of its various funds in maintaining its bank accounts. However, cash applicable to a particular fund is readily identifiable on the County's books. The balance in the pooled cash accounts is available to meet current operating requirements.

State statutes require financial institutions with which the County maintains funds to deposit collateral securities to secure the County's deposits. The amount of collateral securities to be pledged is established by the County Treasurer; this amount must be at least the amount of the deposit to be secured, less the amount insured (by, for example, the FDIC).

The County Treasurer has been authorized by the County's governing board to make investments. Allowable investments are outlined in statutes 62 O.S. § 348.1 and § 348.3.

All investments must be backed by the full faith and credit of the United States Government, the Oklahoma State Government, fully collateralized, or fully insured. All investments as classified by state statute are nonnegotiable certificates of deposit. Nonnegotiable certificates of deposit are not subject to interest rate risk or credit risk.

2. Ad Valorem Tax

The County's property tax is levied each October 1 on the assessed value listed as of January 1 of the same year for all real and personal property located in the County, except certain exempt property. Assessed values are established by the County Assessor within the prescribed guidelines established by the Oklahoma Tax Commission and the State Equalization Board. Title 68 O.S. § 2820.A. states, ". . . Each assessor shall thereafter maintain an active and systematic program of visual inspection on a continuous basis and shall establish an inspection schedule which will result in the individual visual inspection of all taxable property within the county at least once each four (4) years."

Taxes are due on November 1 following the levy date, although they may be paid in two equal installments. If the first half is paid prior to January 1, the second half is not delinquent until April 1. The County Treasurer, according to the law, shall give notice of delinquent taxes and special assessments by publication once a week for two consecutive weeks at any time after April 1, but prior to the end of September following the year the taxes were first due and payable. Unpaid real property taxes become a lien upon said property after the treasurer has perfected the lien by public notice.

Unpaid delinquent personal property taxes are usually published in May. If the taxes are not paid within 30 days from publication, they shall be placed on the personal tax lien docket.

3. Other Information

A. Pension Plan

<u>Plan Description</u>. The County contributes to the Oklahoma Public Employees Retirement Plan (the Plan), a cost-sharing, multiple-employer defined benefit pension plan administered by the Oklahoma Public Employees Retirement System (OPERS). Benefit provisions are established and amended by the Oklahoma Legislature. The Plan provides retirement, disability, and death benefits to Plan members and beneficiaries. Title 74, Sections 901 through 943, as amended, establishes the provisions of the Plan. OPERS issues a publicly available financial report that includes financial statements and supplementary information. That report may be obtained by writing OPERS, P.O. Box 53007, Oklahoma City, Oklahoma 73105 or by calling 1-800-733-9008.

<u>Funding Policy</u>. The contribution rates for each member category are established by the Oklahoma Legislature and are based on an actuarial calculation which is performed to determine the adequacy of contribution rates.

B. Other Post Employment Benefits (OPEB)

In addition to the pension benefits described in the Pension Plan note, OPERS provides post-retirement health care benefits of up to \$105 each for retirees who are members of an eligible group plan. These benefits are funded on a pay-as-you-go basis as part of the overall retirement benefit. OPEB expenditure and participant information is available for the state as a whole; however, information specific to the County is not available nor can it be reasonably estimated.

C. Contingent Liabilities

Amounts received or receivable from grantor agencies are subject to audit and adjustment by grantor agencies, primarily the federal government. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable fund. The amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time; although, the County expects such amounts, if any, to be immaterial.

As of the end of the fiscal year, there were no claims or judgments that would have a material adverse effect on the financial condition of the County; however, the outcome of any lawsuit would not be determinable.

D. Sales Tax

The voters of Custer County approved an extension of a one-half percent (1/2%) sales tax effective July 1, 2017 for a period of 5 years, to fund the following: General Government (50%); County Sheriff (30%); Rural County Fire Departments (8%); OSU Extension office (8%); and County Free Fair (4%). These funds are accounted for in the Sales Tax Cash Fund.

E. Interfund Transfers

During the fiscal year, the County made the following transfers between cash funds:

• \$258,749 was transferred from the Emergency and Transportation Revolving Cash Fund (a Trust and Agency fund) to the County Highway Fund as a loan used for bridge and road projects in the County.



CUSTER COUNTY, OKLAHOMA COMPARATIVE SCHEDULE OF RECEIPTS, EXPENDITURES, AND CHANGES IN CASH BALANCES—BUDGET AND ACTUAL—BUDGETARY BASIS— GENERAL FUND

FOR THE FISCAL YEAR ENDED JUNE 30, 2018

	General Fund				
	Budget	Actual	Variance		
Beginning Cash Balances	\$ 2,643,177	\$ 2,643,177	\$ -		
Less: Prior Year Outstanding Warrants	(15,079)	(15,079)	-		
Less: Prior Year Encumbrances	(15,592)	(14,856)	736		
Beginning Cash Balances, Budgetary Basis	2,612,506	2,613,242	736		
Total Receipts, Budgetary Basis	2,603,709	3,525,642	921,933		
Total Expenditures, Budgetary Basis	5,216,215	3,076,927	2,139,288		
Excess of Receipts and Beginning Cash					
Balances Over Expenditures, Budgetary Basis	\$ -	3,061,957	\$ 3,061,957		
Reconciliation to Statement of Receipts,					
Disbursements, and Changes in Cash Balances					
Add: Current Year Outstanding Warrants		45,801			
Add: Current Year Encumbrances		29,193			
Ending Cash Balance		\$ 3,136,951			

CUSTER COUNTY, OKLAHOMA COMPARATIVE SCHEDULE OF RECEIPTS, EXPENDITURES, AND CHANGES IN CASH BALANCES—BUDGET AND ACTUAL—BUDGETARY BASIS— COUNTY HEALTH DEPARTMENT FUND FOR THE FISCAL YEAR ENDED JUNE 30, 2018

	County Health Department Fund				d	
		Budget		Actual	,	Variance
Beginning Cash Balances	\$	316,501	\$	316,501	\$	
Less: Prior Year Outstanding Warrants		(5,643)		(5,643)		-
Less: Prior Year Encumbrances		(7,306)		(6,763)		543
Beginning Cash Balances, Budgetary Basis		303,552		304,095		543
Total Receipts, Budgetary Basis		494,357		546,310		51,953
Total Expenditures, Budgetary Basis		797,909		350,008		447,901
Excess of Receipts and Beginning Cash						
Balances Over Expenditures,						
Budgetary Basis	\$			500,397	\$	500,397
Reconciliation to Statement of Receipts,						
Disbursements, and Changes in Cash Balances						
Add: Current Year Encumbrances				41,232		
Add: Current Year Outstanding Warrants				25,492		
Ending Cash Balance			\$	567,121		

1. Budgetary Schedules

The Comparative Schedules of Receipts, Expenditures, and Changes in Cash Balances—Budget and Actual—Budgetary Basis for the General Fund and the County Health Department Fund present comparisons of the legally adopted budget with actual data. The "actual" data, as presented in the comparison of budget and actual, will differ from the data as presented in the Statement of Receipts, Disbursements, and Changes in Cash Balances (with Combining Information) because of adopting certain aspects of the budgetary basis of accounting and the adjusting of encumbrances and outstanding warrants to their related budget year.

Encumbrance accounting, under which purchase orders, contracts, and other commitments for the expenditure of monies are recorded in order to reserve that portion of the applicable appropriation, is employed as an extension of formal budgetary integration in these funds. At the end of the year unencumbered appropriations lapse.



CUSTER COUNTY, OKLAHOMA SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2018

Federal Grantor/Pass-Through Grantor/Program Title	Federal CFDA Number	Pass-Through Grantor's Number	Federal Expenditures
U.S. DEPARTMENT OF INTERIOR			
Direct Grant:			
Payment in Lieu of Taxes	15.226		\$ 81,700
Total U.S. Department of Interior			81,700
U.S. DEPARTMENT OF TRANSPORTATION			
Passed Through the Oklahoma Department of Emergency Management: Interagency Hazardous Materials Public Sector Training and Planning Grants	20.703	HMEP	7,012
Total U.S. Department of Transportation			
U.S. DEPARTMENT OF HOMELAND SECURITY			
Passed Through the Oklahoma Department of Emergency Management:			
Disaster Grants - Public Assistance (Presidentially Declared Disasters)	97.036	DR 4556	2,208,719
Hazard Mitigation Grant	97.039	HMGP	13,000
Emergency Management Performance Grants (EMPG)	97.042	EMPG	34,696
Total U.S. Department of Homeland Security			2,256,415
Total Expenditures of Federal Awards			\$ 2,345,127

CUSTER COUNTY, OKLAHOMA NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2018

Basis of Presentation

The schedule of expenditures of federal awards includes the federal grant activity of Custer County, and is presented on the *cash basis of accounting*. The information in this schedule is presented in accordance with the requirements of the Uniform Guidance.

Indirect Cost Rate

Custer County has elected to not use the 10 percent de minimis cost rate allowed for by 2 CFR§ 200.414(f).





Cindy Byrd, CPA | State Auditor & Inspector

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Independent Auditor's Report 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 OFFICERS OF CUSTER COUNTY, OKLAHOMA

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 combined total—all funds of the accompanying Statement of Receipts, Disbursements, and Changes in Cash Balances (with Combining Information) of Custer County, Oklahoma, as of and for the year ended June 30, 2018, and the related notes to the financial statement, which collectively comprises Custer County's basic financial statement, prepared using accounting practices prescribed or permitted by Oklahoma state law, and have issued our report thereon dated December 7, 2020.

Our report included an adverse opinion on the financial statement because the statement is prepared using accounting practices prescribed or permitted by Oklahoma state law, which is a basis of accounting other than accounting principles generally accepted in the United States of America. However, our report also included our opinion that the financial statement does present fairly, in all material respects, the receipts, disbursements, and changes in cash balances – regulatory basis of the County for the year ended June 30, 2018, on the basis of accounting prescribed by Oklahoma state law, described in Note 1.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statement, we considered Custer County's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of Custer County's internal control. Accordingly, we do not express an opinion on the effectiveness of Custer County'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 entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or 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 and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did identify a certain deficiency in internal control, described in the accompanying schedule of findings and questioned costs that we consider to be a material weakness: 2018-001.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Custer County's financial statement is 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 determination of financial statement amounts. 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*.

Custer County's Response to Findings

Custer County's response to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. Custer County's response was not subjected to the auditing procedures applied in the audit of the financial statement and, accordingly, we express no opinion on the response.

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 result 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.

This report is also a public document pursuant to the Oklahoma Open Records Act (51 O.S. § 24A.1 et seq.), and shall be open to any person for inspection and copying.

CINDY BYRD, CPA

OKLAHOMA STATE AUDITOR & INSPECTOR

December 7, 2020



Cindy Byrd, CPA | State Auditor & Inspector

2300 N. Lincoln Blvd., Room 123, Oklahoma City, OK 73105 | 405.521.3495 | www.sai.ok.gov

Independent Auditor's Report on Compliance for Each Major Federal Program and on Internal Control Over Compliance Required by the Uniform Guidance

TO THE OFFICERS OF CUSTER COUNTY, OKLAHOMA

Report on Compliance for Each Major Federal Program

We have audited the compliance of Custer County, Oklahoma, with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on Custer County's major federal program for the year ended June 30, 2018. Custer County's major federal program is 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 statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the County's major federal 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). Those standards and the Uniform Guidance 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 program occurred. An audit includes examining, on a test basis, evidence about Custer County'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 program. However, our audit does not provide a legal determination of Custer County's compliance.



Basis for Qualified Opinion on Disaster Grants- Public Assistance (Presidentially Declared Disasters)

As described in Finding 2018-019 in the accompanying schedule of findings and questioned costs, Custer County did not comply with requirements regarding the following:

Finding #	CFDA#	Program (or Cluster) Name			Compliance Requirement	
2018-019	97.036	Disaster	Grants-	Public	Assistance	Cash Management
		(President	ially Declar	red Disaste		
2018-019	97.036	Disaster	Grants-	Public	Assistance	Period of Performance
		(President	ially Declar	red Disaste		

Compliance with such requirements is necessary, in our opinion, for Custer County to comply with the requirements applicable to that program.

Qualified Opinion on Disaster Grants- Public Assistance (Presidentially Declared Disasters)

In our opinion, except for the noncompliance described in the Basis for Qualified Opinion paragraph, Custer County complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on Disaster Grants - Public Assistance (Presidentially Declared Disasters) for the year ended June 30, 2018.

Other Matters

Custer County's response to the noncompliance findings identified in our audit is described in the accompanying schedule of findings and questioned costs. Custer County's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Report on Internal Control Over Compliance

Management of Custer County 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 County's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal 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 program and to test and report on internal control over compliance in accordance with the Uniform Guidance, 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 Custer County'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 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 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 combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal 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 and therefore, material weaknesses or significant deficiencies may exist that have not been identified. We identified certain deficiencies in internal control over compliance, as described in the accompanying schedule of findings and questioned costs as items 2018-017, 2018-018, that we consider to be material weaknesses.

Custer County's Response to Findings

Custer County's response to the internal control over compliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. Custer County's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

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. Accordingly, this report is not suitable for any other purpose. This report is also a public document pursuant to the Oklahoma Open Records Act (51 O.S., section 24A.1 et seq.), and shall be open to any person for inspection and copying.

CINDY BYRD, CPA

OKLAHOMA STATE AUDITOR & INSPECTOR

December 7, 2020

SECTION 1—Summary of Auditor's Results

<u>Financial Statements</u>
Type of auditor's report issued: Adverse as to GAAP; unmodified as to statutory presentation
Internal control over financial reporting:
Material weakness(es) identified? Yes
Significant deficiency(ies) identified?
Noncompliance material to financial statements noted?
Federal Awards
Internal control over major programs:
Material weakness(es) identified? Yes
Significant deficiency(ies) identified?
Type of auditor's report issued on compliance for major programs:
Any audit findings disclosed that are required to be reported in accordance with 2 CFR § 200.516(a) of the Uniform Guidance?
Identification of Major Programs
<u>OFDA Number(s)</u> 97.036 Name of Federal Program or Cluster Disaster Grants - Public Assistance (Presidentially Declared Disasters)
Dollar threshold used to distinguish between Type A and Type B programs: \$750,000
Auditee qualified as low-risk auditee?

SECTION 2—Findings related to the Report 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*

Finding 2018-001 – Lack of County-Wide Internal Controls (Repeat Finding: 2012-001, 2013-001, 2016-001, 2017-001)

Condition: Through the process of gaining an understanding of the County's internal control structure, it was noted that county-wide controls regarding Risk Assessment and Monitoring have not been designed.

Cause of Condition: Policies and procedures have not been designed and implemented to address the risks of the County.

Effect of Condition: Without an adequate system of county-wide controls, there is greater risk of a breakdown in control activities which could result in unrecorded transactions, undetected errors, or misappropriation of funds.

Recommendation: The Oklahoma State Auditor & Inspector's Office (OSAI) recommends that the County design and implement a system of county-wide procedures to identify and address risks related to financial reporting and to ensure that information is communicated effectively. OSAI also recommends that the County design and implement risk assessment and monitoring procedures to assess the quality of performance over time. These procedures should be written policies and procedures and could be included in the County's policies and procedures handbook.

Management Response:

Chairman of the Board of County Commissioners: The Board of County Commissioners will work to set up quarterly meetings with all elected officials to discuss and take action regarding risk management and monitoring. We will work to assess and identify risks to design county-wide controls going forward.

Criteria: The United States Government Accountability Office's (*Standards for Internal Control in the Federal Government*) (2014 version) aided in guiding our assessments and conclusion. Although this publication (GAO Standards) addresses controls in the federal government, this criterion can be treated as best practices and may be applied as a framework for an internal control system for state, local, and quasi-governmental entities.

The GAO Standards – Section 1 – Fundamental Concepts of Internal Control – OV1.01 states in part:

Definition of Internal Control

Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

Additionally, GAO Standards – Section 2 – Establishing an Effective Internal Control System – OV2.04 states in part:

Components, Principles, and Attributes

Control Environment - The foundation for an internal control system. It provides the discipline and structure to help an entity achieve its objectives.

Risk Assessment - Assesses the risks facing the entity as it seeks to achieve its objectives. This assessment provides the basis for developing appropriate risk responses.

Information and Communication - The quality information management and personnel communicate and use to support the internal control system.

Monitoring - Activities management establishes and operates to assess the quality of performance over time and promptly resolve the findings of audits and other reviews.

SECTION 3— Independent Auditor's Report on Compliance for Each Major Federal Program and on Internal Control Over Compliance Required by the Uniform Guidance

Finding 2018-017 – Lack of County-Wide Controls Over Major Federal Programs – FEMA (Repeat Finding 2016-017, 2017-017)

PASS-THROUGH GRANTOR: Oklahoma Department of Emergency Management

FEDERAL AGENCY: U.S. Department of Homeland Security

CFDA NO: 97.036

FEDERAL PROGRAM NAME: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

FEDERAL AWARD YEAR: 2016

FEDERAL AWARD NUMBER: DR-4256

CONTROL CATEGORY: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Cash Management; Matching, Level of Effort, Earmarking; Period of Performance of Federal Funds; and Special Tests and Provisions

OUESTIONED COSTS: \$-0-

Condition: County-wide controls regarding Control Environment, Risk Assessment, Information and Communication, and Monitoring have not been designed.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure the County complies with grant requirements.

Effect of Condition: Without an adequate system of county-wide controls over major programs, there is greater risk of a breakdown in control activities which could result in unrecorded transactions, undetected errors, or misappropriation of funds.

Recommendation: OSAI recommends the County implement a system of internal controls to ensure compliance with grant requirements.

Management Response:

Chairman of the Board of County Commissioners: We will work to implement a risk assessment plan. We will implement controls to help make sure we are in compliance with all grant requirements and federal funds are expended in accordance with grant agreements and in a timely manner. We will ensure employees have the current and correct compliance supplement to work from. Furthermore, we will work with the County Treasurer and County Clerk's office to ensure all checks and balances are done correctly.

Criteria: The GAO Standards – Section 1 – Fundamental Concepts of Internal Control – OV1.01 states in part:

Definition of Internal Control

Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

Additionally, GAO Standards – Section 2 – Establishing an Effective Internal Control System – OV2.04 states in part:

Components, Principles, and Attributes

Control Environment - The foundation for an internal control system. It provides the discipline and structure to help an entity achieve its objectives.

Risk Assessment - Assesses the risks facing the entity as it seeks to achieve its objectives. This assessment provides the basis for developing appropriate risk responses.

Information and Communication - The quality information management and personnel communicate and use to support the internal control system.

Monitoring - Activities management establishes and operates to assess the quality of performance over time and promptly resolve the findings of audits and other reviews.

Finding 2018-018 – Lack of Internal Controls Over Major Programs - FEMA (Repeat Finding 2016-018, 2017-018)

PASS-THROUGH GRANTOR: Oklahoma Department of Emergency Management

FEDERAL AGENCY: U.S. Department of Homeland Security

CFDA NO: 97.036

FEDERAL PROGRAM NAME: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

FEDERAL AWARD YEAR: 2016

FEDERAL AWARD NUMBER: DR-4256

CUSTER COUNTY, OKLAHOMA SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE FISCAL YEAR ENDED JUNE 30, 2018

CONTROL CATEGORY: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Cash Management; Matching, Level of Effort, Earmarking; Period of Performance of Federal Funds; and Special Test and Provisions **QUESTIONED COSTS:** \$-0-

Condition: During the process of documenting the County's internal controls regarding federal disbursements, we noted that Custer County has not established procedures to ensure compliance with the following compliance requirements: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Cash Management; Matching, Level of Effort, Earmarking; and Period of Performance of Federal Funds.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure federal expenditures are made in accordance with federal compliance requirements.

Effect of Condition: This condition resulted in noncompliance to grant requirements and could result in a loss of federal funds to the County.

Recommendation: OSAI recommends that the County implement a system of internal controls to ensure compliance with grant requirements.

Management Response:

Chairman of the Board of County Commissioners: The Board of County Commissioners will work to ensure internal controls are designed and implemented.

Criteria: *OMB 2 CFR 200, Subpart D.* § .303(a) reads as follows:

Subpart D-Post Federal Award Requirements

§200.303 Internal Controls

The non-Federal entity must:

(a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

Further, accountability and stewardship should be overall goals in management's accounting of federal funds. Internal controls should be designed to monitor compliance with laws and regulations pertaining to grant contracts.

Finding 2018-019 – Noncompliance with Allowable Costs/Cost Principles, Cash Management, and Period of Performance of Federal Funds, Over Major Programs - FEMA

PASS-THROUGH GRANTOR: Oklahoma Department of Emergency Management

FEDERAL AGENCY: U.S. Department of Homeland Security

CUSTER COUNTY, OKLAHOMA SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE FISCAL YEAR ENDED JUNE 30, 2018

CFDA NO: 97.036

FEDERAL PROGRAM NAME: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

FEDERAL AWARD YEAR: 2016

FEDERAL AWARD NUMBER: DR-4256

CONTROL CATEGORY: Cash Management; Period of Performance of Federal Funds

QUESTIONED COSTS: \$-0-

Condition: The following exceptions were noted regarding federal compliance requirements:

• In six (6) of the seven (7) projects tested, federal expenditures extended outside the period of performance and extensions were not requested.

• Federal funds were not expended in a timely manner and interest was not allocated to the federal funds held by the County. The County received \$3,070,657 for their small projects in fiscal year 2017 and only expended \$1,047,961 during the 2017 year. The remainder \$2,022,696 was not expended until fiscal year 2018.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure federal expenditures are made in accordance with federal compliance requirements.

Effect of Condition: This condition resulted in noncompliance to grant requirements and could result in loss of federal funds to the County.

Recommendation: OSAI recommends the County implement a system of internal controls to ensure all federal compliance requirements are met.

Management Response:

Chairman of the Board of County Commissioners: The Board of County Commissioners will work to ensure internal controls are designed and implemented so that federal compliance requirements are met.

Criteria: Accountability and stewardship should be overall goals in management's accounting of federal funds. Internal controls should be designed to monitor compliance with laws and regulations pertaining to grant contracts.

Title 2 CFR § 200.303(a) Internal Controls reads as follows:

The non-federal entity must:

Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

Title 2 CFR § 200.318 (a), General procurement standards, reads as follows:

a) The Non-Federal entity must use its own documented procurement procedures which

reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this part. $\lceil \dots \rceil$

Title 2 CFR § 200.84 Questioned Cost reads as follows:

Questioned cost means a cost that is questioned by the auditor because of an audit finding:

- (a) Which resulted from a violation or possible violation of a statute, regulation, or the terms and conditions of a Federal award, including for fund used to match Federal funds;
- (b) Where the costs, at the time of the audit, are not supported by adequate documentation; or
- (c) Where the costs incurred appear unreasonable and do not reflect the actions a prudent person would take in the circumstances.

Title 2 CFR $\S.305(b)(9)$ Payment -reads as follows:

Interest earned amounts up to \$500 per year may be retained by the non-Federal entity for administrative expense. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. Remittances must include pertinent information of the payee and nature of payment in the memo area (often referred to as "addenda records" by Financial Institutions) as that will assist in the timely posting of interest earned on federal funds. Pertinent details include the Payee Account Number (PAN) if the payment originated from PMS, or Agency information if the payment originated from ASAP, NSF or another federal agency payment system.

Further, GAO Standards – Section 2 – Objectives of an Entity - OV2.23 states in part: *Compliance Objectives*

Management conducts activities in accordance with applicable laws and regulations. As part of specifying compliance objectives, the entity determines which laws and regulations apply to the entity. Management is expected to set objectives that incorporate these requirements. [....]

SECTION 4—This section contains certain matters not required to be reported in accordance with *Government Auditing Standards*. However, we believe these matters are significant enough to bring to management's attention. We recommend that management consider these matters and take appropriate corrective action.

No matters were noted.

APPENDIX A

CORRECTIVE ACTION PLAN

(Prepared by County Management)

CUSTER COUNTY Office of the County Commissioners



Corrective Action Plan in accordance with 2 CFR § 200.511c for the fiscal year ended June 30, 2018

Finding No.	Title (Financial) or CFDA No. & Program Name (Federal)	Planned Corrective Action	Anticipated Completion Date	Responsible Contact Person
2018-001	Lack of County- Wide Controls	The Board of County Commissioners (BOCC) will work with all officials to assess and identify risks.	6-30-2021	Wade Anders, BOCC Chairman
2018-017	CFDA 97.036 – Disaster Grants – Public Assistance (Presidentially Declared Disasters)	The BOCC will work to implement a Risk Assessment Plan.	6-30-2021	Wade Anders, BOCC Chairman
2018-018	CFDA 97.036 – Disaster Grants – Public Assistance (Presidentially Declared Disasters)	The BOCC will work to ensure internal controls are designed and implemented.	6-30-2021	Wade Anders, BOCC Chairman
2018-019	CFDA 97.036 – Disaster Grants – Public Assistance (Presidentially Declared Disasters)	The BOCC will work to ensure com0pliance requirements are met.	6-30-2021	Wade Anders, BOCC Chairman

APPENDIX B

SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

(Prepared by County Management)

CUSTER COUNTY

Office of the County Commissioners



Schedule of Prior Audit Findings and Questioned Costs in accordance with 2 CFR § 200.511b for the fiscal year ended June 30, 2018

FINANCIAL AUDIT FINDINGS

Finding 2012-001, 2013-001, 2016-001, 2017-001

Lack of County-Wide Controls

Finding Summary: County-wide controls regarding Risk Assessment and Monitoring have not been designed.

Status: No corrective action taken.

FEDERAL AUDIT FINDINGS

Finding 2016-017, 2017-017

Lack of County-Wide Controls Over Major Federal Programs – FEMA Pass-Through Grantor: Oklahoma Department of Emergency Management

Federal Agency: U.S. Department of Homeland Security

CFDA No: 97.036

Federal Program Name: Disaster Grants – Public Assistance (Presidentially Declared Disasters)

Federal Award Number: DR-4222

Federal Award Year: 2016

Control Category: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Matching, Level of Effort, Earmarking; Period of Performance of Federal Funds; Procurement and Suspension and Debarment; and Special Tests and

Provisions

Questioned Costs: \$-0-

Finding Summary: County-wide controls regarding Control Environment, Risk Assessment, Information and Communication, and Monitoring have not been designed.

Status: No corrective action taken.

Finding 2016-018, 2017-018

Lack of Internal Controls Over Major Programs - FEMA

Pass-Through Grantor: Oklahoma Department of Emergency Management

Federal Agency: U.S. Department of Homeland Security

CFDA No: DR-4222

Federal Program Name: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

Federal Award Year: 2016

Control Category: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Matching, Level of Effort, Earmarking; Period of Performance of Federal Funds; Procurement and Suspension and Debarment; and Special Tests and Provisions

Ouestioned Costs: \$-0-

Finding Summary: Internal controls to ensure compliance with the following compliance requirements: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Matching, Level of Effort, Earmarking; Period of Performance of Federal Funds; Procurement and Suspension and Debarment; and Special Tests and Provisions have not been established.

Status: No corrective action taken.



