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Travis County Auditor's Office
Subrecipient Risk Assessment Results – Capital IDEA
July 19, 2024

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TRAVIS COUNTY
AUDITOR'S OFFICE

PATTI SMITH, CPA
COUNTY AUDITOR

TRAVIS COUNTY
700 LAVACA
P.O. BOX 1748
AUSTIN, TX 78767
(512) 854-9125
FAX: (512) 854-9164

To: Pilar Sanchez, County Executive
Health & Human Services

From: Patti Smith, CPA
Travis County Auditor

Date: July 19, 2024

Subject: Capital IDEA Risk Assessment Results

The American Rescue Plan Act (ARPA) of 2021 is a $1.9 trillion federal economic stimulus bill. Within the ARPA, the Coronavirus State and Local Fiscal Recovery Fund (LFRF) provides $130 billion for local governments, split evenly between municipalities and counties. Travis County has been allocated $247,450,630 in LFRF funds.

When the County remits LFRF funds to another organization to carry out the federal award, that organization may be considered a subrecipient by the federal government, depending on the details of the County's relationship with that organization. Travis County is required to comply with applicable Code of Federal Regulations (CFR) for its subrecipients. Specifically, the County must comply with 2 CFR §200.332 (b), which requires the County to perform a risk assessment and evaluate internal controls for federal grant subrecipients. The County is required to use these risk assessment results to develop a monitoring plan for the subrecipients.

The Risk Evaluation & Consulting (REC) Division of the Travis County Auditor's Office has completed a risk assessment of grant subrecipient Capital IDEA; the following report details our findings for this risk assessment.

RISK RATINGS

For subrecipient risk assessments, REC utilizes a five-level risk rating scale from very low to very high to quantify risks based on 12 criteria. The ratings for these criteria are then utilized to assign an overall risk rating to the subrecipient of very low, low, medium, high, or very high. We determined the overall risk rating for Capital IDEA to be medium; details about risk criteria rated high and very high are provided in the Areas of Concern paragraph below. See Attachment A for a summary of the individual risk ratings for the 12 risk criteria.

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AREAS OF CONCERN

In this section, we report on risk criteria rated high or very high. We noted the following for Capital IDEA:

High Risk Rating:

Documented Procedures

The County and its subrecipients are required to adhere to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), which include the requirement for documented procedures. We performed a high-level review of the procedures for procurement, record retention, cost principles, and real property submitted by Capital IDEA, noting the following:

Although some of the procedures appeared reasonable, the bulk of the procedures were insufficient for the following reasons:

- The procedure(s) did not address the CFR requirements.
- The procedure(s) covered only a portion of the CFR requirements.
- The procedure(s) consisted of policies rather than procedures.

Policies are the entity's business rules, or in this case, their CFR requirements. Procedures are the steps to be taken to ensure adherence to policy. Note that we only evaluated the submitted procedures and not their actual implementation by the entity.

Very High Risk Rating:

Single Audit

Capital IDEA has not undergone a Single Audit because they have not managed a large enough amount of federal grant funds in the past. The purpose of a Single Audit is to determine if the federal grant recipient has complied with the applicable grant rules and regulations. There is increased risk associated with this subrecipient since the County cannot obtain an external auditor's opinion on this entity's past compliance with federal grant rules and regulations. Because the County is a pass-through entity, if the subrecipient is noncompliant, the County is also noncompliant.

State/Federal Agency Monitoring During the Past 3 Years

Capital IDEA was not subjected to state or federal grant monitoring during the past 3 years. The purpose of monitoring is to determine if the grant recipient has complied with applicable grant rules and regulations. There is increased risk associated with this subrecipient since the County is unable to obtain information about this entity's past compliance with grant rules and regulations. As previously mentioned, the County is a pass-through entity, so if the subrecipient is noncompliant, the County is also noncompliant.

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Personnel Experience and/or Turnover

Capital IDEA hasn't experienced a large amount of personnel turnover, but the turnover it has experienced is in key financial/grant staff positions. A consistency of experienced staff typically results in a more reliable subrecipient performance. There is increased risk associated with this subrecipient due to a high percentage of employees who are relatively new and/or inexperienced in their roles and responsibilities under our agreement.

RECOMMENDATIONS FOR IMPROVEMENT

The concerns reported above are significant because the County is a pass-through entity. If the subrecipient is found to be noncompliant, the federal government will also consider the County to be noncompliant. We recommend the following to Capital IDEA:

- The federal government requires their grant recipients to document, implement, and maintain procedures for several functional areas to improve the entity's overall internal control environment. If a subrecipient is unable to provide the requested procedures, it is likely they have not determined the processes their organization will utilize to comply with federal requirements. Consequently, it will be difficult for the subrecipient to comply with the numerous LFRF grant rules and regulations. Capital IDEA should review their current procedures and make improvements as necessary to ensure compliance with all grant terms and federal requirements as stated in 2 CFR 200.

- Capital IDEA's lack of experience with federal grants and regulations could result in a loss of County funds and/or difficulty with the grantor. We recommend Capital IDEA ensure they implement a strong system of internal controls for their accounting and grant processes.

- Capital IDEA should improve their record keeping for their monitoring visits, and they should request a monitoring report from entities performing monitoring if one is not provided.

- Due to the number of open positions and employees who are new to their jobs, there is an increased likelihood of grant reporting errors that could result in the County making incorrect LFRF reimbursements. We recommend Capital IDEA ensure their system of internal controls includes sufficient independent supervisory review of the work completed by the new employees and provide training as needed.

FINANCIAL OBSERVATIONS

The following observations are based on the September 30, 2023, audited financial statements provided by Capital IDEA:

Financial Statements

- Annual revenues totaled $4,329,428. Revenues were comprised of government grants (78.7%), contributions (15.3%), employer partner fees (4.0%), and other revenue (2.0%). Expenditures totaled $5,601,081, which resulted in an excess of expenditures over revenues of $1,271,653.

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- Assets totaled $4,163,339 and liabilities $1,005,018, resulting in net assets of $3,158,321. There were donor restrictions of $104,225 on these net assets.

Financial Ratios

Ratios of Concern:

- The savings indicator ratio is -22.7% [(revenues - expenses)/total expenses], which is well below the average for nonprofits of this size of 4.3%. This ratio measures the net revenues that are retained by the organization as a percentage of expenses.

- The contributions and grants ratio is 94.0% [(contributions + grant revenue)/total revenue], which far exceeds the average of 47.0% for nonprofits of this size. This ratio measures the organization's reliance on voluntary support, so high values indicate less diverse revenue sources and greater susceptibility to downturns in the economy.

- The fundraising efficiency ratio is $6.87 [total contributions (other than government grants)/fundraising expenses], which is below the average of $11.45 for nonprofits of this size. This ratio measures the dollar amount of contributions raised for each dollar spent on fundraising, so a higher amount is better.

Ratios Within Acceptable Limits*:*

- The program efficiency ratio is 84.4% (program expense/total expenses), while the average for nonprofits of similar size[1] is 85.2%. Ideally, the ratio is at least 75%, but less than 90%. It is important to invest in infrastructure to help ensure a strong administrative support system for program activities.

- The current ratio is 4.8:1 (current assets/current liabilities), with 1:1 being the minimum suggested. This ratio measures the nonprofit's ability to pay short term obligations (due within one year) with current assets.

- Net assets without donor restrictions as a percentage of total expenses is 54.5%, meaning expenses could be paid with net assets for 199 days (54.5% x 365 days). The Government Finance Officers Association recommends having a minimum of two months, so Capital IDEA is well beyond this threshold.

- The days cash on hand ratio is 184 days (cash + cash equivalents)/[(total expenses - depreciation expense)/365 days], which is well beyond the average of 99 days for nonprofits of this size, although there is both a benefit and an opportunity cost to holding cash reserves. This calculation measures the number of days of expenses that can be covered from existing cash and cash equivalents.

[1] Cashwell, K., Copley, PhD, CPA, P., & Dugan, DBA, M. (May 2019 Issue) *Using Ratio Analysis to Manage Not-for-Profit Organizations.* The CPA Journal. https://www.cpajournal.com/2019/06/05/using-ratio-analysis-to-manage-not-for-profit-organizations/. Nonprofits of a similar size refer to those with assets totaling $100,000 to $500,000. Capital IDEA's assets totaled $311,644 on December 31, 2021.

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- The fundraising expense ratio is 1.7% (fundraising expenses/total expenses), which is under the average of 2.2% for nonprofits of similar size. Generally, donors prefer revenues to be spent on program expenses rather than administrative costs such as fundraising, so a lower fundraising expense ratio is considered better to those considering donation to the nonprofit.

RISK ASSESSMENT TEAM

Ely Allen, Financial Analyst III

CLOSING

This report is intended solely for the information and use of County departments and offices involved with processing LFRF grant funds and the Commissioners Court. Please contact us if you have any concerns or questions regarding this report.

DocuSigned by:
David Jungerman
5B5801D13DFE48D...

David Jungerman, CIA
Chief Assistant County Auditor II
Risk Evaluation & Consulting Division

DocuSigned by:
Patti Smith
53FF54208085479...

Patti Smith, CPA
Travis County Auditor

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Risk Assessment File

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ATTACHMENT A – RISK ASSESSMENT RATINGS

Risk Assessment Criteria	Rating
1. Financial impropriety involving the subrecipient reported in the media	Very Low
2. Amount of grant award for this project/program	Medium
3. Experience managing any type of grant funds	Very Low
4. Grant experience: dollar amount of grant revenue for most recent fiscal year.	Very Low
5. Single Audit	Very High
6. Financial statement audit	Very Low
7. Financial records and reporting	Very Low
8. State/federal agency monitoring during the past 3 years	Very High
9. Personnel experience and/or turnover	Very High
10. Internal Controls Questionnaire	Medium
11. Documented procedures 2 CFR 200	High
12. Financial Ratios	Medium
Overall Risk Rating	Medium