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Subrecipient Risk Assessment Memo – Travis County Emergency Services District No. 4

September 20, 2026



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To: Charles Brotherton, County Executive
Emergency Services

From: Patti Smith, CPA
Travis County Auditor

Date: September 20, 2026

Subject: Travis County Emergency Services District No. 4 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 Travis County Emergency Services District No. 4 (TravCo ESD4); 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 TravCo ESD4 to be high; 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 TravCo ESD4:

High Risk Rating:

Experience Managing Grant Funds
TravCo ESD4 has one year of federal grant experience; consequently, TravCo ESD4 was not required to comply with federal regulations and grant rules in the past. This lack of experience represents an increased risk to the County.

Internal Controls Questionnaire
TravCo ESD4 completed an Internal Control Questionnaire for this risk assessment. In evaluating, REC noted four internal control issues and four segregations of duties issue. This subrecipient demonstrates an elevated risk level due to weaknesses identified in its internal control environment.

Very High Risk Rating:

Single Audit
TravCo ESD4 has not undergone a Single Audit since they have not previously managed federal grant funds that meet the required threshold. 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

State/Federal Agency Monitoring During the Past Three Years
TravCo ESD4 was not subjected to state or federal grant monitoring during the past three 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.

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 includes 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 TravCo ESD4. 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.

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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.

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. In this connection, we recommend TravCo ESD4 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. We also recommend TravCo ESD4's system of internal controls includes increased independent supervisory review, formalized approval processes, and clear separation of financial duties.

FINANCIAL OBSERVATIONS

The following observations are based on September 30, 2025, audited financial statements provided by TravCo ESD4:

Financial Statements

- Annual revenues totaled $9,697,799. Revenues were comprised of sales taxes (59.4%), property taxes (29.7%), interest (10.7%), and other revenue (0.2%). Expenditures totaled $5,882,529, which resulted in an excess of revenues over expenditures of $3,815,270.

- Assets totaled $28,504,834 and liabilities $70,497, resulting in net assets of $28,434,337.

Financial Ratios

Ratios of Concern:
The days cash on hand ratio is two days (cash + cash equivalents)/[(total expenses - depreciation expense)/365 days], which is less than the average of 396 days for entities of this size[1]. This calculation measures the number of days of expenses that can be covered from existing cash and cash equivalents.

Ratios Within Acceptable Limits:

- The current ratio is 360:1 (current assets/current liabilities), with 1:1 being the minimum suggested. This ratio measures the entities' ability to pay short-term obligations (due within one year) with current assets.

[1] A comparison base for financial ratios was built utilizing the financial statements of all seventeen Travis County Emergency Services Districts as well as 8 other Emergency Services Districts from similar population sizes or similar divisions of districts.

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- The savings indicator ratio is 64.9% [(revenues - expenses)/total expenses], which is above the average for entities of this size of 42.5%. This ratio measures the net revenues that are retained by the organization as a percentage of expenses.

RISK ASSESSMENT TEAM

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Conner Wanees, Financial Analyst II
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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.

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