




Elizabeth Comfort  
Finance Director

**Department of Finance**

Public Services Building  
2051 Kaen Road, Suite 490 | Oregon City, OR 97045

**MEMORANDUM**

TO: Clackamas County Board of County Commissioners (BCC)  
FROM: Elizabeth Comfort   
RE: FY22 Single Audit Finding  
DATE: July 11, 2023

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**REQUEST:** Informational only.

**BACKGROUND:** The County is required to participate in a Single Audit every year, where an external auditor goes over a financial management processes, including its financial management system and its compliance with federal grant requirements. Single Audits are required for grantees that receive money from the federal government (grants, cooperative agreements, etc) and expend more than \$750,000 of federal dollars in a single fiscal year. During the Single Audit, the auditors perform a risk assessment and major program determination to determine specific Federal programs for testing. For the Single Audit of the year-ended June 30, 2022, there were five major federal programs tested.

The Fiscal Year 2022 audit, one of the major federal programs tested, Assistance Listing Number 21.023 Emergency Rental Assistance, has a "Significant Deficiency in Internal Control" over Compliance. A significant deficiency in internal control is less severe than a material weakness, but important to share.

The US Treasury's COVID-19 Emergency Rental Assistance Program grant required monthly reporting 15 days following the previous month. The reporting deadlines were very difficult to meet due to the amount of information requested, including demographic information for each recipient. Subsequent to the fiscal year-end, the US Treasury changed from monthly to quarterly reporting.

County departments were not able to locate the documentation of the January requested extension from the US Treasury, and the US Treasury has not responded to requests for documentation they may have. Social Services has demonstrated a history of actively communicating with the US Treasury, as well as following procedures for extensions. However, in this one month, documentation could not be located in their records.

The Corrective Action Plan document from Finance is attached to this memo and included in the Single Audit final report from the independent auditors, Moss Adams.

Respectfully Submitted,

Elizabeth Comfort, Finance Director

Attachments: Corrective Action Plan



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June 29, 2023

In accordance with OMB Uniform Guidance, we have provided below Clackamas County's response and corrective action plan addressing the findings in the "Report on Federal Awards in Accordance with the OMB Uniform Guidance" for the fiscal year that ended June 30, 2022.

**Finding 2022-001: Reporting – Significant Deficiency in Internal Control over Compliance**

Management agrees with the finding and the auditor's recommendation.

**Contact Person responsible for corrective action:**

Patrick Williams  
Deputy Finance Director  
pwilliams@clackamas.us  
971-325-5392

**Corrective Action Planned:**

Procedures will be incorporated into the County workflow to provide additional monitoring, oversight, and record retention related to reporting. These will include:

- Compiling a comprehensive inventory of grants and reporting deadlines
- Timely monitoring for the status of reporting and tracking of extensions
- Obtain copies of all grant reports and documentation of extensions with Finance records

**Anticipated Completion Date:**

December 31, 2023

Sincerely,

Elizabeth Comfort  
Finance Director