

COUNTY OF HUMBOLDT
SINGLE AUDIT REPORT
YEAR ENDED JUNE 30, 2024



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**INDEPENDENT AUDITORS' 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***

Board of Supervisors
County of Humboldt
Eureka, California

We have audited 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, the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the County of Humboldt (the County), as of and for the year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the County's basic financial statements, and have issued our report thereon dated November 26, 2025. Our report included an adverse opinion for the omission of the discretely presented component unit.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the County'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 County's internal control. Accordingly, we do not express an opinion on the effectiveness of the County's internal control.

Our consideration of internal control was for the limited purpose described in the preceding 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. However, as described in the accompanying schedule of findings and questioned costs, we identified certain deficiencies in internal control that we consider to be material weaknesses and significant deficiencies.

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.

We consider the deficiencies described in the accompanying schedule of findings and questioned costs as items 2024-001, 2024-002, 2024-003 and 2024-005 to be material weaknesses.

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. We consider the deficiency described in the accompanying schedule of findings and questioned costs as item 2024-004 to be a significant deficiency.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the County'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*.

The County of Humboldt's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the County's response to the findings identified in our audit and described in the accompanying schedule of findings and questioned costs. The County's response was not subjected to the other auditing procedures applied in the audit of the financial statements 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 County'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.



CliftonLarsonAllen LLP

Roseville, California
November 26, 2025



**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR
FEDERAL PROGRAM, REPORT ON INTERNAL CONTROL OVER COMPLIANCE,
AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL
AWARDS REQUIRED BY THE UNIFORM GUIDANCE**

Board of Supervisors
County of Humboldt
Eureka, California

Report on Compliance for Each Major Federal Program

Qualified and Unmodified Opinions

We have audited County of Humboldt's compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of County of Humboldt's major federal programs for the year ended June 30, 2024. County of Humboldt's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

Qualified Opinion on Airport Improvement Program, ALN 20.106

In our opinion, except for the noncompliance described in the Basis for Qualified and Unmodified Opinions section of our report, County of Humboldt complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on Airport Improvement Program for the year ended June 30, 2024.

Unmodified Opinion on Each of the Other Major Federal Programs

In our opinion, County of Humboldt 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 other major federal programs identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs for the year ended June 30, 2024.

Basis for Qualified and Unmodified Opinions

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); 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). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditors' Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of County of Humboldt and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified and unmodified opinions on compliance for each major federal program. Our audit does not provide a legal determination of County of Humboldt's compliance with the compliance requirements referred to above.

Matter(s) Giving Rise to Qualified Opinion on Airport Improvement Program, ALN 20.106

As described in the accompanying schedule of findings and questioned costs, County of Humboldt did not comply with requirements regarding Assistance Listing No. 20.106 Airport Improvement Program as described in finding numbers 2024-006 for reporting.

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

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to the County's federal programs.

Auditors' Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the County's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the County's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the County's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the County's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances 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 the County's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Other Matters

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as item 2024-007. Our opinion on each major federal program is not modified with respect to these matters.

Government Auditing Standards requires the auditor to perform limited procedures on the County's response to the noncompliance findings identified in our compliance audit described in the accompanying schedule of findings and questioned costs. The County's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Report on Internal Control Over Compliance

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

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 a 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. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2024-006 to be a material weakness.

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 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. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2024-007 to be a significant deficiency.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

Government Auditing Standards requires the auditor to perform limited procedures on the County's response to the internal control over compliance findings identified in our audit described in the accompanying schedule of findings and questioned costs. The County's response was not subjected to the other 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.

Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

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 County, as of and for the year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the County's basic financial statements. We issued our report thereon dated November 26, 2025, which contained unmodified opinions on all opinion units except for the discretely presented component unit, which was an adverse opinion for the omission of the discretely presented component unit. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the 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 basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic 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 awards is fairly stated in all material respects in relation to the basic financial statements as a whole.



CliftonLarsonAllen LLP

Roseville, California
November 26, 2025

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**COUNTY OF HUMBOLDT
SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS
YEAR ENDED JUNE 30, 2024**

Federal Grantor/Pass-Through Grantor/Program Title	Federal Assistance Listing Number	Pass-Through Grantor's Number	Disbursements/Expenditures	Passed-Through to Subrecipients
<u>U.S. Department of Agriculture</u>				
Passed-through State Department of Food & Agriculture:				
Phytophthora Ramorum	10.025	6570000016/017	18,561	-
PDCP/GWSS/Bio Control	10.025	9990000K01	4,043	-
PDCP/GWSS/Bio Control	10.025	9990000K04	2,135	-
Asian Defoliating Moth Survey	10.025	6570000385	3,060	-
Subtotal Federal Assistance Listing Number 10.025			27,799	-
Passed-through State Department of Public Health:				
Special Supplemental Nutrition Program for Women, Infants, and Children	10.578	19-10150 A02	1,177,876	-
Supplemental Nutrition Assistance Program (SNAP)	10.551	19-10355	243,623	-
Passed-through State Department of Social Services:				
State Administrative Matching Grants for the Supplemental Nutrition Assistance Program	10.561		8,216,176	-
Subtotal SNAP Cluster			8,459,799	-
Passed-through State Department of Education:				
National School Lunch Program	10.555		30,751	-
Subtotal Child Nutrition Cluster			30,751	-
Passed-through CA Fire Safe Council:				
Flash USDA Clearinghouse Grant	10.664	21 SFA 356365	565,011	-
Clearinghouse 2021 Phase III	10.664		72,443	-
Subtotal Federal Assistance Listing Number 10.664			637,454	-
Passed-through United States Endowment for Forestry and Communities:				
USDA Forest Services Campground/Patrol	10.704		7,619	-
Direct Programs:				
Secure Rural Schools Title III	10.665		430,146	-
Subtotal Schools and Roads Cluster			430,146	-
Total U.S. Department of Agriculture			\$ 10,771,444	\$ -
<u>U.S. Department of Commerce</u>				
Passed-through National Oceanic and Atmospheric Administration:				
Intertidal Coastal Marsh Restoration and Transportation Corridor Protection in Humboldt Bay	11.473		\$ 103,042	\$ -
<u>U.S. Department of Housing and Urban Development</u>				
Passed-through the State Department of Housing and Community Development:				
CDBG Microenterprise Program	14.228	16-CDBG-12992	\$ 6,225	\$ -
CDBG Microenterprise Program	14.228	16-CDBG-12992	543	-
CDBG Microenterprise Program	14.228	16-CDBG-12992	293	-
CDBG Redwood Rural Hospital Roads (COVID)	14.228	20-CDBG-CV1-00029	760	-
CDBG Redwood Rural Hospital Roads (COVID)	14.228	20-CDBG-CV1-00029	123,400	-
CDBG Redwood Rural Hospital Sidewalks (COVID)	14.228	20-CDBG-CV2-3-00317	712	-
CDBG Redwood Rural Hospital Sidewalks (COVID)	14.228	20-CDBG-CV2-3-00317	56,559	-
CDBG Boyd Road Homeless Shelter Improvements (COVID)	14.228	20-CDBG-CV1-00097	918	-
CDBG Boyd Road Homeless Shelter Improvements (COVID)	14.228	20-CDBG-CV1-00097	21,761	-
CDBG Boyd Road Homeless Shelter Improvements (COVID)	14.228	20-CDBG-CV1-00097	179	-
CDBG Humboldt Inn - Elevator (COVID)	14.228	20-CDBG-CV2-3-00336	253	-
CDBG - Outstanding Loans	14.228		2,286,967	-
Subtotal Federal Assistance Listing Number 14.228			2,498,571	-
HOME Program Income Expenses	14.239		34,577	-
HOME - Outstanding Loans	14.239		13,729,515	-
Subtotal Federal Assistance Listing Number 14.239			13,764,092	-
Passed-through State Department of Public Health, Office of AIDS:				
Housing Opportunities for Persons with AIDS (HOPWA)	14.241	19-11126	121,411	-
Continuum of Care Program (HART)	14.267	CA0313L9T221912	97,143	-
Total U.S. Department of Housing and Urban Development			\$ 16,481,217	\$ -

See accompanying Notes to Schedule of Expenditures of Federal Awards.

**COUNTY OF HUMBOLDT
SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS
YEAR ENDED JUNE 30, 2024**

Federal Grantor/Pass-Through Grantor/Program Title	Federal Assistance Listing Number	Pass-Through Grantor's Number	Disbursements/ Expenditures	Passed-Through to Subrecipients
<u>U.S. Department of the Interior</u>				
Direct Program:				
Federal in Lieu - Public Land	15.226		\$ 1,117,527	\$ -
Total U.S. Department of the Interior			<u>\$ 1,117,527</u>	<u>\$ -</u>
<u>U.S. Department of Justice</u>				
Passed-through Governor's Office of Emergency Services:				
Victim Witness Assistance Program -VW	16.575	VW21390120	99,057	-
Victim Witness Assistance Program - VW	16.575	VW22400120	371,067	-
Child Advocacy Center Program - KC	16.575	KC21050120	178,899	-
Child Advocacy Center Program - KC	16.575	KC22010120	45,945	-
Subtotal Federal Assistance Listing Number 16.575			<u>694,968</u>	<u>-</u>
Violence Against Women Vertical Prosecution	16.588	VV23010120	66,768	-
Probation Specialized Units (PU) Program	16.588		111,346	-
Subtotal Federal Assistance Listing Number 16.588			<u>178,114</u>	<u>-</u>
Passed-through Office of Justice Programs:				
Criminal Alien Assistance Program (SCAAP)	16.606		28,094	-
Bulletproof Vest Program (BVP)	16.607		5,650	-
Byrne JAG State	16.803		233,495	20,662
Byrne JAG Local Grant 2022	16.804		4,375	-
Passed-through Board of State and Community Corrections:				
Edward Byrne Memorial Justice Assistance Grant Program	16.738	BSCC 649-19	20,000	-
Byrne JAG Local Grant 2023	16.738		23,071	-
Subtotal Federal Assistance Listing Number 16.738			<u>43,071</u>	<u>-</u>
Passed-through Drug Enforcement Agency:				
Domestic Cannabis Eradication/Suppression Program (DCE/SP) FY21	16.202		32,475	-
Domestic Cannabis Eradication/Suppression Program (DCE/SP) FY22	16.202		69,696	-
Subtotal Federal Assistance Listing Number 16.202			<u>102,171</u>	<u>-</u>
Total U.S. Department of Justice			<u>\$ 1,289,938</u>	<u>\$ 20,662</u>
<u>U.S. Department of Labor</u>				
Passed-through State Employment Development Division (EDD):				
Workforce Investment and Opportunity Act (WIOA) Adult	17.258	AA311007	421,082	417,060
Workforce Investment and Opportunity Act (WIOA) Adult	17.258	AA411007	178,024	126,686
Subtotal Federal Assistance Listing Number 17.258			<u>599,106</u>	<u>543,746</u>
Workforce Investment and Opportunity Act (WIOA) Youth	17.259	AA311007	307,374	278,319
Workforce Investment and Opportunity Act (WIOA) Youth	17.259	AA411007	134,336	90,293
Subtotal Federal Assistance Listing Number 17.259			<u>441,710</u>	<u>368,612</u>
Workforce Investment and Opportunity Act (WIOA) Additional Assistance Offshore Wind	17.278	AA211007	485,391	-
Workforce Investment and Opportunity Act (WIOA) Additional Assistance Offshore Wind	17.278	AA311007	345,508	-
Workforce Investment and Opportunity Act (WIOA) Dislocated Worker	17.278	AA311007	69,318	57,990
Workforce Investment and Opportunity Act (WIOA) Dislocated Worker	17.278	AA411007	109,000	80,039
Workforce Investment and Opportunity Act (WIOA) Rapid Response	17.278	AA311007	92,795	15,490
Workforce Investment and Opportunity Act (WIOA) Rapid Response	17.278	AA411007	104,220	70,576
Workforce Investment and Opportunity Act (WIOA) Rapid Response Layoff Aversion	17.278	AA311007	22,386	-
Workforce Investment and Opportunity Act (WIOA) Rapid Response Layoff Aversion	17.278	AA411007	18,693	-
Subtotal Federal Assistance Listing Number 17.278			<u>1,247,311</u>	<u>224,095</u>
Subtotal WIOA Cluster			<u>2,288,127</u>	<u>1,136,453</u>
Workforce Investment and Opportunity Act (WIOA) NDWG	17.277	AA311007	129,760	116,139
Total U.S. Department of Labor			<u>\$ 2,417,887</u>	<u>\$ 1,252,592</u>

See accompanying Notes to Schedule of Expenditures of Federal Awards.

COUNTY OF HUMBOLDT
SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS (CONTINUED)
YEAR ENDED JUNE 30, 2024

Federal Grantor/Pass-Through Grantor/Program Title	Federal Assistance Listing Number	Pass-Through Grantor's Number	Disbursements/ Expenditures	Passed-Through to Subrecipients
<u>U.S. Department of Transportation</u>				
Direct Programs:				
COVID-19 Airport Improvement Program (COVID)	20.106		\$ 669,784	\$ -
COVID-19 Airport Improvement Program (COVID)	20.106		508,043	-
COVID-19 Airport Improvement Program (COVID)	20.106		404,696	-
COVID-19 Airport Improvement Program (COVID)	20.106		107,520	-
COVID-19 Airport Improvement Program (COVID)	20.106		15,054,909	-
Subtotal Federal Assistance Listing Number 20.106			16,744,952	-
Passed-through State Department of Transportation:				
Highway Bridge Replacement & Rehabilitation	20.205		5,802,517	-
Emergency Relief	20.205		6,881,342	-
Highway Safety Improvement Program	20.205		79,405	-
Active Transportation Program	20.205		3,913,917	-
Subtotal Highway Planning and Construction Cluster			16,677,181	-
Total U.S. Department of Transportation			\$ 33,422,133	\$ -
<u>U.S. Department of Treasury</u>				
Direct Programs:				
COVID-19 Coronavirus State and Local Fiscal Recovery Funds	21.027		2,770,822	-
Total U.S. Department of Treasury			\$ 2,770,822	\$ -
<u>U.S. Environmental Protection Agency</u>				
Direct Programs:				
Brownfield Grant	66.818	BF-96986701-0	\$ 2,862	\$ -
Brownfield Grant	66.818	BF-96986801-0	13,500	-
Brownfield Grant	66.818	BF-96986801-0	14,069	-
Total U.S. Environmental Protection Agency			\$ 30,431	\$ -
<u>U.S. Department of Health and Human Services</u>				
Passed-through State Department of Public Health:				
Public Health Emergency Preparedness	93.069	22-10648	\$ 150,610	\$ -
Federal Reimbursement Grant (Public Health Emergency Preparedness Lab)	93.069	22-10648	345,728	-
Pandemic Flu	93.069	22-10648	61,606	-
Subtotal Federal Assistance Listing Number 93.069			557,944	-
Epidemiology and Laboratory Capacity for Infectious Diseases SHARP	93.323	ELCPHLSHARP-03	29,375	-
LAB Advanced Molecular Detection (AMD)	93.323	AMDPHL02	73,110	-
Epidemiology and Laboratory Capacity for Infectious Diseases (ELC) Enhancing Detection	93.323		219,876	-
Epidemiology and Laboratory Capacity for Infectious Diseases (ELC) Enhancing Detection Expansion	93.323		754,279	-
COVID-19 ELC Detection & Mitigation of COVID-19 in Confinement Facilities Funding	93.323		118,545	-
Subtotal Federal Assistance Listing Number 93.323			1,195,185	-
COVID-19 California Immunization Program Covid-19	93.268	22-11036	423,995	-
Public Health Crisis Response Cooperative Agreement:				
COVID-19 Public Health Workforce Supplemental Funding	93.354	17-10155	107,656	-
HIV CARE Program X07	93.917	18-10867	151,798	-
Hospital Preparedness Program	93.889	22-10648	158,346	-
Maternal Child And Adolescent Health	93.994		303,429	-

See accompanying Notes to Schedule of Expenditures of Federal Awards.

**COUNTY OF HUMBOLDT
SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Federal Grantor/Pass-Through Grantor/Program Title	Federal Assistance Listing Number	Pass-Through Grantor's Number	Disbursements/ Expenditures	Passed-Through to Subrecipients
U.S. Department of Health and Human Services (Continued)				
Child Health and Disability Prevention	93.778		\$ 41,098	\$ -
California Childrens Services	93.778		325,806	-
Medi-Cal Administrative Activities	93.778		1,115,186	-
Targeted Case Management	93.778		179,523	-
Passed-through the State Department of Health Care Services:				
CHDP - Health Care Program for Children in Foster Care	93.778		144,331	-
CHDP - HCPCFC Caseload Relief	93.778		66,679	-
CHDP - HCPCFC Foster Care Administration	93.778		108,476	-
CHDP - HCPCFC PIMM&O	93.778		10,589	-
Medical Assistance Program (CEC)	93.778		8,922,659	-
Subtotal Medicaid Cluster			<u>10,914,347</u>	<u>-</u>
Passed-through State Department of Social Services:				
Guardianship Assistance (CEC)	93.090		31,190	-
Guardianship Assistance (CA 800)	93.090		913,548	-
Subtotal Federal Assistance Listing Number 93.090			<u>944,738</u>	<u>-</u>
Promoting Safe and Stable Families (CEC)	93.556		116,009	-
Temporary Assistance for Needy Families (CEC)	93.558		15,512,046	-
Temporary Assistance for Needy Families (CA 800)	93.558		5,825,741	-
Subtotal TANF Cluster			<u>21,337,787</u>	<u>-</u>
Refugee and Entrant Assistance State Administered Program	93.566		6,394	-
Adoptions Incentives (CEC)	93.603		6,481	-
Stephanie Tubbs Jones Child Welfare Services Program	93.645		102,068	-
Foster Care Title IV-E (CEC)	93.658		8,247,113	-
Foster Care Title IV-E (CA 800)	93.658		1,740,277	-
Subtotal Federal Assistance Listing Number 93.658			<u>9,987,390</u>	<u>-</u>
Adoption Assistance (CEC)	93.659		227,579	-
Adoption Assistance (CA 800)	93.659		9,801,288	-
Subtotal Federal Assistance Listing Number 93.659			<u>10,028,867</u>	<u>-</u>
Social Services Block Grant (CEC)	93.667		253,484	-
Social Services Block Grant (CA 800)	93.667		482,302	-
Subtotal Federal Assistance Listing Number 93.667			<u>735,786</u>	<u>-</u>
Chafee Foster Care Independence Program	93.674		159,826	-
Elder Abuse Prevention Interventions Program (CEC)	93.747		698,799	-
Passed-through SAMSHA:				
Drug Free Communities	93.276	5H79SP080807-07	18,329	-
Community Mental Health Services Block Grant (MHBG)	93.958		856,832	-
American Rescue Plan Act (ARPA) (MHBG supplemental)	93.958		201,855	-
Subtotal Federal Assistance Listing Number 93.958			<u>1,058,687</u>	<u>-</u>
Substance Abuse Block Grant (SABG)	93.959		1,075,155	-
American Rescue Plan Act (ARPA) (SABG supplemental)	93.959		167,241	-
Subtotal Federal Assistance Listing Number 93.959			<u>1,242,396</u>	<u>-</u>
Passed-through State Department of Child Support Services:				
Child Support Enforcement	93.563		2,800,019	-
Total U.S. Department of Health and Human Services			<u>\$ 63,056,276</u>	<u>\$ -</u>

See accompanying Notes to Schedule of Expenditures of Federal Awards.

COUNTY OF HUMBOLDT
SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS (CONTINUED)
YEAR ENDED JUNE 30, 2024

Federal Grantor/Pass-Through Grantor/Program Title	Federal Assistance Listing Number	Pass-Through Grantor's Number	Disbursements/ Expenditures	Passed-Through to Subrecipients
<u>U.S. Department of Homeland Security</u>				
Direct Programs:				
Disaster Grants - Public Assistance	97.036		\$ 2,214,179	\$ -
Passed-through the Governor's Office of Emergency Services:				
FEMA - COVID-19 Assistance project #168652	97.036		314,806	-
FEMA - COVID-19 Assistance project #684343	97.036		740,508	-
FEMA - COVID-19 Assistance project #684350	97.036		594,896	-
FEMA - COVID-19 Assistance project #684142	97.036		765,189	-
FEMA - COVID-19 Assistance project #181067	97.036		464,463	-
Subtotal Federal Assistance Listing Number 97.036			<u>5,094,041</u>	<u>-</u>
Emergency Management Performance Grant FY22	97.042		47,655	-
Emergency Management Performance Grant FY23	97.042		101,205	-
Subtotal Federal Assistance Listing Number 97.042			<u>148,860</u>	<u>-</u>
Homeland Security Grant Program FY21	97.067		162,210	47,935
Homeland Security Grant Program FY22	97.067		45,348	-
Homeland Security Grant Program FY20	97.067		19,263	-
Subtotal Federal Assistance Listing Number 97.067			<u>226,820</u>	<u>47,935</u>
Passed-through Federal Emergency Management Agency:				
Hazard Mitigation Grant Program	97.039		1,117	-
Port Security Grant Program	97.056		<u>236,250</u>	<u>-</u>
Total U.S. Department of Homeland Security			<u>\$ 5,707,088</u>	<u>\$ 47,935</u>
Total Expenditures of Federal Awards			<u>\$ 137,167,804</u>	<u>\$ 1,321,189</u>

See accompanying Notes to Schedule of Expenditures of Federal Awards.

COUNTY OF HUMBOLDT
NOTES TO SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS
JUNE 30, 2024

NOTE 1 BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the County of Humboldt under programs of the federal government for the year ended June 30, 2024. The information in this Schedule is presented in accordance with the requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of Humboldt County, it is not intended to and does not present the financial position or changes in net position of the County.

NOTE 2 BASIS OF ACCOUNTING

The accompanying Schedule of Expenditures of Federal Awards is presented using the modified accrual basis of accounting and the accrual basis of accounting for program expenditures accounted for in governmental funds and proprietary funds, respectively, as described in Note 1 of the County's basic financial statements. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

NOTE 3 PASS-THROUGH ENTITIES' IDENTIFYING NUMBER

When federal awards were received from a pass-through entity, the Schedule shows, if available, the identifying number assigned by the pass-through entity. When no identifying number is shown, the County either determined that no identifying number is assigned for the program or was simply unable to obtain an identifying number from the pass-through entity.

NOTE 4 INDIRECT COST RATE

The County did not elect to use the 10% de minimis indirect cost rate as covered in 2 CFR §200.414.

COUNTY OF HUMBOLDT
NOTES TO SCHEDULE OF EXPENDITURES AND FEDERAL AWARDS
JUNE 30, 2024

NOTE 5 LOANS WITH CONTINUING COMPLIANCE REQUIREMENT

Outstanding federally funded program loans, with a continuing compliance requirement, carried balances as of June 30, 2024 as follows:

Federal ALN	Program Title	Loans Outstanding June 30, 2023	New Loans	Loan Payments	Loans Outstanding June 30, 2024
14.228	Community Development Block Grants/States Program	\$ 2,286,967	\$ -	\$ -	\$ 2,286,967
14.239	HOME Investment Partnerships Program	13,729,515	19,001	(196,851)	13,551,665

NOTE 6 OTHER LOANS

CFDA 66.818 – Brownfields Revolving Loan Fund Grants are not included in the Schedule of Expenditures of Federal Awards (SEFA) as they do not have ongoing compliance requirements under the Uniform Guidance.

Outstanding federally funded program loans, carried balances as of June 30, 2024 as follows:

Federal ALN	Program Title	Outstanding Loans June 30, 2024
66.818	Brownfield Loans	\$ 2,320,000

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED JUNE 30, 2024**

Section I – Summary of Auditors’ Results

Financial Statements

1. Type of Auditors' Report Issued:

<u>Opinion Unit</u>	<u>Type of Opinion</u>
Governmental Activities	Unmodified
Business-type Activities	Unmodified
Major Funds	Unmodified
Aggregate Remaining Fund Information	Unmodified
Discretely Presented Component Unit	Adverse

2. Internal Control over Financial Reporting:

- Material Weakness(es) Identified? X Yes No
- Significant Deficiency(ies) Identified not Considered to be Material Weakness(es)? X Yes None Reported

3. Noncompliance Matters to Financial Statements Noted? Yes X No

Federal Awards

1. Internal Control over Major Programs:

- Material Weakness(es) Identified? X Yes No
- Significant Deficiency(ies) Identified not Considered to be Material Weaknesses? X Yes None Reported

2. Type of Auditors' Report Issued on Compliance for

Major Programs:

Unmodified for all major federal programs except for the Airport Improvement Program, ALN 20.106 which is qualified.

3. Any Audit Findings Disclosed that are Required to be Reported in Accordance with the Uniform Guidance? X Yes No

4. Identification of Major Programs:

<u>Federal Assistance Listing Number(s)</u>	<u>Name of Federal Program</u>
93.778	Medicaid Cluster
20.106	Airport Improvement Program
14.239	HOME Investment Partnerships Program
20.205	Highway Planning and Construction Cluster

5. Dollar Threshold used to Distinguish Between Type A and Type B Programs? \$3,000,000

6. Auditee Qualified as Low-Risk Auditee Under the Uniform Guidance, Section 520? Yes X No

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Section II – Financial Statement Findings

2024 – 001

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: The County did not present the discretely presented component unit, Fortuna Fire Protection District (District), in the reporting entity as required because the audited financial statements for the district excluded the Volunteer Fire Department, a blended component unit of the District.

While the governing board of the County appoints all the members of the district's governing board, the district should be discretely presented because its governing board is not substantively the same as the County's.

Criteria: Generally Accepted Accounting Principles in the United States of America (GAAP) requires the County's financial statements to present the activities of the County and its component units.

Context: The District represents the County's only discretely presented component unit.

Effect: Users of the financial statements are not able to completely rely on the District's financial statements since they may not be complete and accurate.

Cause: The District's records were not fully available for the audit.

Repeat Finding: Finding is a repeat finding from the prior year (2023-001).

Recommendation: We recommend the County work closely with the district to report on all component units that make up the district.

Views of Responsible Officials: There is no disagreement with the audit finding.

COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024

Section II – Financial Statement Findings (Continued)

2024 – 002

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: Testing over the existence of accounts receivable identified four duplicate accruals totaling \$1,294,985 in the Road Fund and \$8,702,791 in the mental health department of the General Fund. Testing over the completeness of accounts receivable also identified revenues earned in FY24 but not accrued totaling \$579,041 in the Road Fund. The duplicate accrual in the Road Fund was initially accrued by the department based on anticipated revenue and was accrued a second time when funding was received in FY25. Revenues earned in FY24 but not accrued related to reimbursement for project expenses that were incurred in both FY24 and FY25 but recorded only in FY25. Duplicate accruals in the General Fund related to long term receivables for Cost Settlements with the State of California Department of Health Services. These receivables were accrued in prior years when the revenues were determined to be earned and measurable. A portion of this balance was received in FY25 and accrued to FY24 a second time. Based on these findings the department performed a full review and reconciliation of accounts receivable balances. This reconciliation identified additional duplicate accruals in the mental health and public health departments. As a result of these duplicate and missed accruals accounts receivable and unavailable revenue were overstated by \$715,944 in the Road Fund and \$19,493,217 in the general fund. Additionally, government-wide revenue was overstated by \$19,493,217.

Criteria: Under GAAP and GASB standards, revenue should be recognized when it is both measurable and available. GASB Statement No. 33 and Codification Section 1600.108 emphasize that accruals must be based on reliable estimates and that governments must adopt consistent and well-documented revenue recognition policies.

Context: CLA reviewed 32 accounts receivable balances as of June 30, 2024. During the review, we identified 4 duplicate transactions. As a result, 4 of these transactions should not have been accrued. CLA also review 56 subsequent revenue transactions and identified 1 transaction relating to FY24 revenue that was not accrued. Based on these findings the County performed a full review of and reconciliation of accounts receivable for the mental health department of the general fund and identified additional duplicate accruals in the mental health and public health departments. This resulted in a net adjustment of \$715,944 in the road fund and \$19,493,217 in the general fund.

Effect: The duplicate accruals and missed accruals resulted in an overstatement of accounts receivable, unavailable revenue, and revenue in the County's financial statements. Specifically, accounts receivable and unavailable revenue were overstated by \$715,944 in the Road Fund and \$19,493,217 in the General Fund and the government-wide intergovernmental revenue was overstated by \$19,493,217. These errors inflated Fiscal Year 2024 receivable balances at both the government-wide and fund levels, unavailable revenue at the fund level, and revenue at the government-wide level, misrepresenting the County's financial position and potentially impacting budgetary decisions and financial reporting accuracy.

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Section II – Financial Statement Findings (Continued)

Cause: This misstatement occurred due to confusion regarding changes in the County's accrual process. The County implemented additional procedures related to review of subsequent revenue receipts intended to identify revenues earned in the previous fiscal year. However, this process did not include reconciliation of and comparison with existing accruals. As a result, departments accrued revenue based on expectations and then re-accrued the same revenue upon receipt, without verifying existing accruals.

Repeat Finding: This is not a repeat finding.

Recommendation: We recommend that the County develop formal procedures related to accounts receivable accruals. These procedures should include a review and reconciliation of existing accruals prior to recording new accruals to prevent duplication. Additionally, training should be provided to departments to ensure consistent understanding and application of the updated accrual process.

Views of Responsible Officials: There is no disagreement with the audit finding.

COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024

Section II – Financial Statement Findings (Continued)

2024 – 003

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: During our review of the County’s year-end working trial balance, we identified \$600,958 in unavailable revenue recorded in the Aviation Enterprise Fund. Enterprise Funds follow the accrual basis of accounting, under which revenue should be recognized when earned, regardless of availability.

Criteria: Under Generally Accepted Accounting Principles (GAAP) and GASB standards, Enterprise Funds must recognize revenue when it is earned, not when it becomes available. Recording unavailable revenue in an accrual-based fund is inconsistent with these principles and may result in misstated financial statements.

Context: CLA reviewed the County’s unavailable revenue balances as part of the financial statement audit and noted that the Aviation Enterprise Fund included balances that should not be classified as unavailable under the accrual basis.

Effect: The County understated revenue and overstated deferred inflows in the Aviation Enterprise Fund by \$600,958, misrepresenting the fund’s financial position and performance for the fiscal year.

Cause: The misstatement occurred due to a lack of review procedures over unavailable revenue balances in accrual-based funds and limited staff understanding of revenue recognition principles applicable to Enterprise Funds.

Repeat Finding: This is not a repeat finding.

Recommendation: We recommend the County implement a formal review process for unavailable revenue balances during the financial statement closing process. Additionally, we recommend the County provide staff training on revenue recognition principles specific to accrual-based funds.

Views of Responsible Officials: There is no disagreement with the audit finding.

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Section II – Financial Statement Findings (Continued)

2024 – 004

Type of Finding:

- Significant Deficiency in Internal Control over Financial Reporting

Condition: During our review of the County’s subsequent payments, we identified two transactions totaling \$355,624 that were not properly accrued for Fiscal Year 2024 in the Road Fund.

Criteria: Under Generally Accepted Accounting Principles (GAAP) and GASB standards, expenditures should be recognized in the period in which the liability is incurred, regardless of when payment is made. For governmental funds using the modified accrual basis, liabilities should be recorded when goods or services have been received and payment is due.

Context: CLA reviewed a sample of transactions from the County’s subsequent payments and noted that these two items met the criteria for accrual but were omitted from the year-end entries.

Effect: The County understated expenditures and liabilities in the Road Fund by \$355,624, resulting in an inaccurate representation of the fund’s financial activity for Fiscal Year 2024.

Cause: The misstatement occurred due to a breakdown in the County’s year-end accrual process, where certain liabilities were not identified or reviewed in time for inclusion in the financial statements.

Repeat Finding: This is not a repeat finding.

Recommendation: We recommend the County enhance its year-end closing procedures to ensure all liabilities incurred during the fiscal year are properly identified and accrued. This should include a thorough review of outstanding invoices and purchase orders near year-end.

Views of Responsible Officials: There is no disagreement with the audit finding.

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Section II – Financial Statement Findings (Continued)

2024 – 005

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: Testing over the existence of accounts receivable in the mental health department of the General Fund identified several duplicate revenue accruals. As a result, the department performed a full reconciliation of long-term accounts receivable. The department's initial reconciliation included an additional \$4,448,345 in accounts receivable accruals that lacked adequate supporting documentation. These accruals were subsequently removed after it was determined they did not meet the criteria for recognition under modified accrual accounting.

Criteria: Per GASB Statement No. 33 and GASB Codification Section 1600, revenue in governmental funds should only be recognized when it is measurable and available. If revenue is not expected to be collected within the current period or soon enough thereafter, it must be reported as unavailable revenue. Accruals must be supported by documentation showing a valid receivable and reasonable expectation of collection.

Context: CLA requested support for one transaction totaling \$3,630,751 from the revised reconciliation of long-term receivables in the mental health department of the General Fund. The department was unable to provide supporting documentation for the requested transaction. The department also determined that four additional transactions totaling \$817,594 could not be substantiated. As a result, five transactions totaling \$4,448,345 were removed from the county's long-term accounts receivable.

Effect: The unsupported accruals resulted in an overstatement of accounts receivable, unavailable revenue, and revenue in the County's financial statements. Specifically, accounts receivable and unavailable revenue were overstated in the General Fund by \$4,448,345, and accounts receivable and intergovernmental revenue were overstated at the government-wide level by \$4,448,345. These errors inflated Fiscal Year 2024 revenue, unavailable revenue, and receivable balances at both the government-wide and fund levels, and fund-level unavailable revenue balances, misrepresenting the County's financial position and potentially impacting budgetary decisions and financial reporting accuracy.

Cause: This misstatement occurred due to a lack of understanding of revenue recognition and a failure to maintain proper reconciliations and documentation.

Repeat Finding: This is not a repeat finding.

Recommendation: We recommend that the County require departments to maintain documentation supporting the existence of all Accounts Receivable accruals.

Views of Responsible Officials: There is no disagreement with the audit finding.

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Section III – Federal Award Findings and Questioned Costs

2024 – 006

Federal agency: Federal Aviation Administration

Federal program title: Airport Improvement Program

Assistance Listing Number: 20.106

Pass-Through Agency: N/A

Pass-Through Number(s): N/A

Award Period: July 1, 2023 to June 30, 2024

Type of Finding: Material Weakness in Internal Control over Compliance, Material Noncompliance

Criteria: Federal Aviation Administration (FAA) guidelines require Airport Improvement Program recipients to submit periodic financial reports, including SF-425 (Federal Financial Report), Form 5100-127 (Operating and Financial Summary), Form 5100-126 (Financial Government Payment Report), Form 5370-1 (Construction Progress and Inspection Report), and Form SF-271 (Requests for Reimbursement) in accordance with 2 CFR §200.328 and §200.329.

Condition: During our testing, we noted that for each of the County's seven Airport Improvement Program grants, only Form SF-271 was submitted for the audit period, despite requirements to submit five distinct report types per grant.

Questioned costs: None

Context: We initially sampled 31 of 105 reports required to be submitted during the year by the granting agency. 11 of the 11 SF-271 reports were received from the county and tested without exception. The department explained that Forms SF-425, 5100-127, 5100-126, and 5370-1 had not been submitted for the year under audit and therefore could not be provided.

Cause: The aviation department was previously not aware of the reporting requirements of the grant. When the department became aware of the requirements they began working with the FAA to ensure all required reports were submitted. The delay in becoming aware of these requirements resulted in a significant backlog to be submitted which was exacerbated by understaffing at the department.

Effect: The County's failure to submit four of the five required reports for each of its seven Airport Improvement Program grants resulted in noncompliance with FAA reporting requirements under 2 CFR §200.328 and §200.329. This lack of reporting may impact the County's ability to demonstrate proper stewardship of federal funds, delay reimbursement processing, and potentially affect future grant eligibility or funding decisions.

Repeat Finding: This is not a repeat finding.

Recommendation: CLA recommends that the County provide staff with training related to identifying and complying with grant requirements. Additionally, CLA recommends that the County implement tracking procedures, such as a monitoring checklist, to ensure all required reports are submitted in a timely manner.

Views of responsible officials: There is no disagreement with the audit finding.

**COUNTY OF HUMBOLDT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2024**

Section III – Federal Award Findings and Questioned Costs (Continued)

2024 – 007

Federal agency: Centers for Medicare and Medicaid Services

Federal program title: Medical Assistance Program

Assistance Listing Number: 93.778

Pass-Through Agency: State of California, Department of Health Care Services

Pass-Through Number(s): N/A

Award Period: July 1, 2023 to June 30, 2024

Type of Finding: Significant deficiency in Internal Control over Compliance, Other Matters

Criteria: As required at 42 CFR 435.916, states must renew MAGI-based determinations of eligibility once every 12 months and no more frequently than once every 12 months. For non-MAGI beneficiaries, states must renew eligibility at least once every 12 months as described in the Medicaid state plan.

Condition: During the review of 60 sampled cases, 2 cases were found where redeterminations were performed outside the required 12-month window, indicating non-compliance with federal renewal timing requirements. And one of the two cases were deemed ineligible during the re-evaluation.

Questioned costs: None

Context: Out of 60 sampled cases, 2 cases had redeterminations performed outside the federally required 12-month window. And one of the two cases were deemed ineligible during the re-evaluation. Additionally, of the 60 cases scheduled for lead or supervisor-level review, 6 were not completed in accordance with the review requirements. This gap in oversight may contribute to procedural inconsistencies and potential noncompliance with Medicaid renewal protocols.

Cause: The delay in performing redeterminations beyond the required 12-month window was due to understaffing, which limited the team's capacity to process eligibility renewals in a timely manner. Additionally, the failure to complete scheduled lead/supervisor reviews in 6 cases was attributed to ineffective internal controls, including insufficient tracking and oversight mechanisms to ensure that supervisory reviews were consistently executed.

Effect: Failure to perform redeterminations within the required 12-month timeframe may result in individuals retaining Medicaid coverage beyond their eligibility period, potentially leading to inaccurate benefit payments and noncompliance with federal regulations. Additionally, the absence of scheduled lead/supervisor reviews weakens oversight and quality assurance processes, increasing the risk of procedural errors, inconsistent eligibility determinations, and reduced program integrity.

Repeat Finding: This is not a repeat finding.

Recommendation: CLA recommends that the County implement or reinforce tracking procedures, such as a monitoring checklist, to ensure lead and supervisor reviews are completed and accountability is maintained. Additionally, CLA recommends that the County conduct targeted refresher training for staff and supervisors on renewal timelines and review protocols to strengthen procedural compliance and minimize errors.

Views of responsible officials: There is no disagreement with the audit finding.



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