Paramount, California

Single Audit and Independent Auditors' Reports

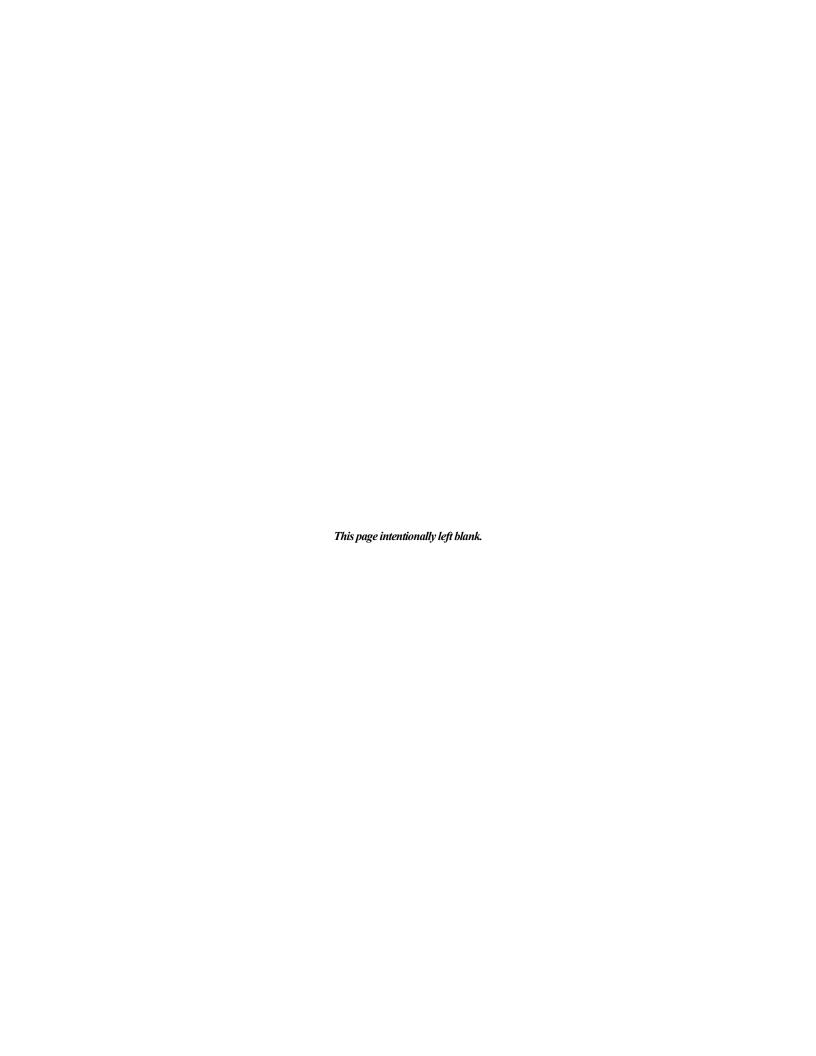
For the Year Ended June 30, 2023



City of Paramount Single Audit and Independent Auditors' Reports For the Year Ended June 30, 2023

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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

Independent Auditors' Report

To the Honorable Mayor and the Members of City Council of the City of Paramount
Paramount, California

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 ("*Government Auditing Standards*"), the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City of Paramount, California (the "City"), as of and for the year ended June 30, 2023, and the related notes to the financial statements, which collectively comprise the City's basic financial statements, and have issued our report thereon dated December 20, 2023.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the City'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 City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City'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 a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the City's financial statements will not be prevented, or detected and corrected, on a timely basis. 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.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section 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 not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weakness. We identified certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as item 2023-001 that we consider to be significant deficiencies.







To the Honorable Mayor and the Members of City Council of the City of Paramount
Paramount, California
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The Ren Group, LLP

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the City's financial statements are free of 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 instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of findings and questioned costs as item 2023-001.

The City's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the City's response to the findings identified in our audit and described in the accompanying schedule of findings and questioned costs. The City'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 results 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.

Santa Ana, California December 20, 2023



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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

Independent Auditors' Report

To the Honorable Mayor and the Members of City Council of the City of Paramount
Paramount, California

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the City of Paramount, California's (the "City") 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 the City's major federal programs for the year ended June 30, 2023. The City's major federal programs are identified in the summary of the auditors' results section of the accompanying Schedule of Findings and Questioned Costs.

In our opinion, the City complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2023.

Basis for Opinion on Each Major Federal Program

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 ("Government Auditing Standards"), 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 the City 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 opinion on compliance for each major federal program. Our audit does not provide a legal determination of City's compliance with the compliance requirements referred to above.

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 City's federal programs.







To the Honorable Mayor and the Members of City Council of the City of Paramount
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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 City'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 City'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 City'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 City'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 City'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.

Report on 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 a combination of deficiencies, in internal control over 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 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.

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. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

To the Honorable Mayor and the Members of City Council of the City of Paramount
Paramount, California
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The Red Group, LLP

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.

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 the 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 City as of and for the year ended June 30, 2023, and the related notes to the financial statements, which collectively comprise the City's basic financial statements. We issued our report thereon dated December 20, 2023 which contained unmodified opinions on those financial statements. 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 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 GAAS. In our opinion, the Schedule of Expenditure of Federal Awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

Santa Ana, California

March 28, 2024, except for the Schedule of Expenditures of Federal Awards, which is as of December 20, 2023.

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City of Paramount Schedule of Expenditures of Federal Awards For the Year Ended June 30, 2023

	Assistance	Agency or		
Federal Grantor/Pass-Through Grantor	Listing	Pass-Through	Federal	Expenditures
Program Title	Number	Number	Expenditures	to Subrecipients
U.S. Department of Housing and Urban Development				
Direct Programs:				
CDBG - Entitlement Grants Cluster:				
Community Development Block Grants/Entitlement Grants	14.218	B-22-MC-06-0591	\$ 314,058	-
Community Development Block Grants/Entitlement Grants	14.218	B-21-MC-06-0591	218,351	-
Community Development Block Grants/Entitlement Grants	14.218	B-20-MC-06-0591	131,576	-
COVID-19 - Community Development Block Grants/				
Enrirlement Grants	14.218	B-20-MW-06-0591	232,082	
Total - CDBG - Entitlement Grants Cluster			896,067	
Direct Programs:				
HOME Investment Partnerships Program	14.239	M-22-MC-06-0558	30,791	-
HOME Investment Partnerships Program	14.239	M-20-MC-06-0558	47,568	-
HOME Investment Partnerships Program	14.239	M-19-MC-06-0558	36,456	-
HOME Investment Partnerships Program	14.239	M-18-MC-06-0558	31,467	-
HOME Investment Partnerships Program	14.239	M-17-MC-06-0558	5,430	-
Total - HOME Investment Partnerships Program			151,712	
Total U.S. Department of Housing and Urban Development			1,047,779	
U.S. Department of the Treasury				
Direct Program:				
COVID-19 - Coronavirus State and Local Fiscal Recovery Fund	1 21.027	2021	14,025,993	712,000
Total U.S. Department of the Treasury			14,025,993	712,000
U.S. Environmental Protection Agency				
Direct Program:				
Surveys, Studies, Research, Investigations, Demonstrations, and				
Special Purpose Activities Relating to the Clean Air Act	66.034	98T58701	35,688	
Total U.S. Environmental Protection Agency			35,688	
Total Expenditures of Federal Awards			\$15,109,460	\$ 712,000

Notes to the Schedule of Expenditures of Federal Awards For the Year Ended June 30, 2023

Note 1 – Reporting Entity

The financial reporting entity, as defined by the Governmental Accounting Standards Board ("GASB") Codification, consists of the primary government, which is the City of Paramount, California (the "City"), organizations for which the primary government is financially accountable, and other organizations for which the nature and significance of their relationship with the primary government are such that exclusion would cause the City's financial statements to be misleading or incomplete.

The City Council acts as the governing body and is able to impose its will on the following organization, establishing financial accountability:

- The Paramount Housing Authority
- The Paramount Parking Authority
- The Paramount Industrial Development Authority
- The Paramount Public Financing Authority

Note 2 – Summary of Significant Accounting Policies

Basis of Accounting

Funds received under the various grant programs have been recorded within the General Fund, special revenue funds and enterprise fund of the City. The City utilizes the modified accrual basis of accounting for the General Fund and special revenue funds and the accrual basis of accounting for the enterprise funds. The accompanying Schedule of Expenditures of Federal Awards (the "Schedule") is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations ("CFR") Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the "Uniform Guidance"). Therefore, some amounts presented in the Schedule may differ from amounts presented in, or used in, the preparation of City's basic financial statements.

Schedule of Expenditures of Federal Awards

The accompanying Schedule presents the activity of all federal award programs of the City. All federal financial awards received directly from federal agencies, as well as federal financial awards passed through other governmental agencies, are included in the Schedule. The Schedule was prepared from only the accounts of various grant programs and, therefore, does not present the financial position or results of operations of the City.

Indirect Cost Rate

The City did not elect to use the 10% de minimis cost rate.

Schedule of Findings and Questioned Costs For the Year Ended June 30, 2023

Section I – Summary of Auditors' Results

Financial Statements

Types of report the auditors issued on whether the financial statements audited were prepared in accordance with GAAP:

Unmodified

Internal control over financial reporting:

• Material weakness(es) identified?

No

• Significant deficiency(ies) identified?

2023-001

Noncompliance material to financial statements noted?

No

Federal Awards

Internal control over major federal programs:

• Material weakness(es) identified?

No

• Significant deficiency(ies) identified?

None Reported

Type of auditors' report issued on compliance for major federal programs:

Unmodified

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?

No

Identification of major federal programs:

Assistance Listing Numbers	Major Federal Program or Cluster	Federal Expenditures
21.027	COVID-19 - Coronavirus State and Local Fiscal Recovery Funds	\$ 14,025,993
	Total Expenditures of All Major Federal Programs	
Total Expenditures of Federal Awards Percent of Total Expenditures of Federal Awards		\$ 15,109,460
		92.83%

Dollar threshold used to distinguish between type A and type B programs: \$750,000

Auditee qualified as a low-risk auditee in accordance with 2 CFR 200.520?

Yes

City of Paramount Schedule of Findings and Questioned Costs (Continued) For the Year Ended June 30, 2023

Section II – Financial Statement Findings

A. Current Year Findings – Financial Statement

Finding 2023-001 Internal Control and Compliance over Measure W Reporting

Criteria

Los Angeles County Code of Ordinance §18.06B requires each municipality prepare, prior to the start of the municipality's fiscal year, a plan for how SCW Program funds will be used in the ensuing fiscal year. In accordance with Safe, Clean Water Program - Municipal Program Transfer Agreement, Section IV A, the Municipality shall annually prepare and submit to the District, an Annual Plan. The Annual Plan for the 2020-21 Fiscal Year shall be submitted to the District no later than 45-days after the execution of this Agreement by the last party to sign. An Annual Plan for each subsequent Fiscal Year shall be submitted not later than 90-days prior to the start of the Fiscal Year for which the Plan is prepared.

Los Angeles County Code of Ordinance §18.06D requires each municipality prepare and submit an annual report to the Los Angeles County Flood Control District (the "District"), no later than six months after the end of the municipality's fiscal year. In accordance with Safe, Clean Water Program - Municipal Program Transfer Agreement, Exhibit B – General Terms and Conditions, Section B-30, the Los Angeles County Flood Control District may withhold all or any portion of the SCW program payment for any fiscal year in the event that the Municipality has violate any provision of the Transfer Agreement or fail to submit annual reports on meeting SCW Program goals. Los Angeles County Code of Ordinance §18.07F requires infrastructure program project developers prepare and submit quarterly progress and expenditures report for the regional program. It also requires submission of annual summary of the quarterly progress and expenditures reports.

In accordance with Safe, Clean Water Program - Regional Program Transfer Agreement, Exhibit B – General Terms and Conditions, Section B-33, the Quarterly Progress/Expenditure Reports are due within 45 days following the end of the calendar quarter and the annually, a summary of the Quarterly Progress/Expenditures Reports within 6 months after the close of the fourth quarter (June 30). In accordance with Safe, Clean Water Program - Regional Program Transfer Agreement, Exhibit B – General Terms and Conditions, Section B-14, shall the recipient of regional program fail to submit timely Quarterly Progress/Expenditure Reports, the District shall provide a notice of default and give the recipient 10 calendar days or longer to cure the default. If the recipient fails to cure the default within the prescribed time, the District may 1) declare the contribution be immediately repaid, with interest at the rate equal to the State of California general obligation bond interest rate in effect at the time of the default, 2) terminate any obligation to make future payments to the recipient, 3) terminate the agreement, or 4) take any other action that it deems necessary.

Condition:

We noted the Annual Progress/Expenditure Report only reported \$221,762 and \$111,807 for the years ended June 30, 2023 and 2021, respectively, where the expenditures incurred were in the amounts of \$636,233 and \$208,577, respectively.

City of Paramount Schedule of Findings and Questioned Costs (Continued) For the Year Ended June 30, 2023

Section II – Financial Statement Findings (Continued)

A. Current Year Findings – Financial Statement (Continued)

Finding 2023-001 Internal Control and Compliance over Measure W Reporting (Continued)

Condition (Continued):

We also noted the following late reporting.

Required Report	Freqquency	Period End	Deadline	Date Submitted
Municipal Program				
Initial Annual Spending Plan	Annual	June 30, 2021	November 21, 2020	January 12, 2021
Subsequent Annual Spending Plan	Annual	June 30, 2022	April 1, 2021	April 8, 2021
Subsequent Annual Spending Plan	Annual	June 30, 2023	April 1, 2022	March 30, 2022
Annual Progress/Expenditure Report	Annual	June 30, 2021	December 31, 2021	December 28, 2021
Annual Progress/Expenditure Report	Annual	June 30, 2022	December 31, 2022	January 4, 2023
Annual Progress/Expenditure Report	Annual	June 30, 2023	December 31, 2023	January 4, 2024
Regional Program				
Quarterly Progress/Expenditures Report	Quarterly	March 31, 2022	May 15, 2022	May 19, 2022
Quarterly Progress/Expenditures Report	Quarterly	June 30, 2022	August 15, 2022	August 24, 2022
Quarterly Progress/Expenditures Report	Quarterly	September 30, 2022	November 15, 2022	November 28, 2022

Cause:

There are inadequate monitoring controls to ensure the reports are filed timely and correctly.

Effect or Potential Effect:

Without timely and correctly submitting the required annual spending plan and the quarterly/annual reports, the City is not in compliance with the SCW Program requirements and could result in loss of funding.

Recommendation:

We recommend the City develop policies and procedures to ensure timely submission of the annual spending plans and the reports and the accuracy of the reports.

View of Responsible Officials:

Staff has been working closely with the Los Angeles County Flood Control District on clarification regarding certain aspects of the reporting as this is a new program and has been going through many internal modifications. Although this was done verbally, the County approved the minor delays given the new program reporting tools. Staff has made modifications to its internal management of the Measure W Program to process extensions in writing when needed for auditing compliance purposes. Moving forward all future reports have been placed on a master calendar to achieve timely compliance with this new program.

B. Prior Year Findings – Financial Statement

No prior year findings were reported.

Schedule of Findings and Questioned Costs (Continued) For the Year Ended June 30, 2023

Section III - Federal Award Findings and Questioned Costs

A. Current Year Findings and Questioned Costs – Major Federal Award Program Audit

No current year findings were reported.

B. Prior Year Findings and Questioned Costs - Major Federal Award Program Audit

Finding 2022-001 Internal Control and Compliance over Procurement, Suspension and Debarment

Identification of the Federal Program:

Assistance Listing Number: 21.027

Assistance Listing Title: Coronavirus State and Local Fiscal Recovery Funds (CSLFRF)

Federal Agency: U.S. Department of the Treasury

Federal Award Identification Number: 2021

Condition:

The following required procurement standards were not addressed in the City's policy:

- Conflict of interest, including disciplinary actions for failure to adhere (2 CFR 200.318)
- Avoid acquisition of duplicative items (2 CFR 200.318)
- Cost effective purchasing (2 CFR 200.318)
- Document retention (2 CFR 200.318)
- Provisions to ensure all solicitations (2 CFR 200.319): Incorporate clear and accurate descriptions of technical requirements, do not restrict competition, and identify all requirements which the offerors must fulfill and factors used in evaluation
- Disadvantaged Business Enterprise program (2 CFR 200.321)
- Recovered materials, if subject to EPA requirements (2 CFR 200.322)
- Contract price/types (2 CFR 200.323)
- Bonding requirements (2 CFR 200.325)
- Contract provisions (2 CFR 200.326)

Additionally, 3 instances were noted in which the City did not verify whether the vendor was not suspended, debarred, or otherwise excluded before entering into a covered transaction rather, verification was performed after entering into the transaction. The City asserted that they verified the vendors were not suspended or debarred; however, no documentation of the procedure being performed prior to entering into the transaction was presented.

Recommendation:

It recommended that the City modify and strengthen its policies and procedures to ensure that the required Uniform Guidance standards are addressed.

Status:

Finding was resolved during the year ended June 30, 2023.

Schedule of Findings and Questioned Costs (Continued) For the Year Ended June 30, 2023

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

B. Prior Year Findings and Questioned Costs – Major Federal Award Program Audit (Continued)

Finding 2022-002 Internal Control and Compliance over Reporting

Identification of the Federal Program:

Assistance Listing Number: 21.027

Assistance Listing Title: Coronavirus State and Local Fiscal Recovery Funds (CSLFRF)

Federal Agency: U.S. Department of the Treasury

Federal Award Identification Number: 2021

Condition:

4 instances in which the City did not retain evidence to document the individual approving the City's required performance reports were identified.

Current obligations were reported inaccurately for the Quarter 1 and 2 Project and Expenditure Reports. Additionally, expenditure information was reported inaccurately for the Quarter 2 Project and Expenditure Report and the report was submitted past the required deadline.

Further, \$48,834 for the purchase of energy efficient lighting upgrades to City Hall were reported incorrectly under "Public Health - Negative Economic Impact" instead of "Revenue Replacement".

Recommendation:

It was recommended that the City enhance internal controls to ensure Interim and Project and Expenditure Reports are prepared in accordance with program requirements.

Status:

Finding was resolved during the year ended June 30, 2023.

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