



Audit of Passed-through Texas Parks and Wildlife Department COVID-19 Coronavirus State and Local Fiscal Recovery Funds Grant

March 26, 2026

Mamatha Sparks
Interim City Auditor

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Executive Summary

The City of Dallas was awarded \$20 million in Coronavirus State and Local Fiscal Recovery Funds through a Texas Parks and Wildlife Department grant, authorized by the 87th Texas Legislature under the American Rescue Plan Act of 2021. The intent of the grant is to support projects for State House District 111 and the southern Dallas community.

On August 24, 2022, the grant funds were accepted by the Dallas City Council through Council Resolution No. 22-1240 and appropriated as follows:

- \$10 million to Park and Recreation for parks and trails in State House District 111, including athletic field improvements and facilities lighting projects.
- \$3.5 million for digital signage similar to that on display at the National Museum of African American History and Culture in Washington, D.C.; subsequently, appropriated to the Office of Arts and Culture for unidentified programs.
- \$6.5 million to City staff to identify additional projects in collaboration with Texas Parks and Wildlife Department and the State House District 111 representative; subsequently, appropriated to the Office of Housing and Community Empowerment (formerly Office of Community Care and Empowerment).

The scope of this audit included all City activities supporting the use of Passed-through Texas Parks and Wildlife Department COVID-19 -Coronavirus State and Local Fiscal Recovery Funds Grant for the period from November 8, 2021 to December 31, 2024.

As of October 31, 2025, \$20 million was appropriated as follows:

- Park and Recreation—\$9,514,976, with 88.14 percent unexpended.
- Office of Housing and Community Empowerment—\$6,549,500, with 48.8 percent unexpended.
- Office of Arts and Culture—\$3,500,000, with 100 percent unexpended.
- Office of Budget and Management Services—\$435,524, with 97.85 percent unexpended.

Objectives and Conclusions

1. Has the City complied with all City procurement and fund administration requirements as well as American Rescue Plan Act requirements?

Generally, yes. The procurement process for awarding the grant funds followed the City's procurement process and fund administration requirements, as well as American Rescue Plan Act, except for Park and Recreation's selection of landscape architectural firms for landscape design services.

In this one instance, Park and Recreation did not fully apply the evaluation criteria stated in the Request for Proposal when evaluating the submitted proposals. Also, when awarding the contracts to the three highest-rated firms, Park and Recreation moved Twin Falls Park from Group 3 to Group 1, as listed in the Request of Proposal, which was the basis of the proposals submitted. (See [Objective I.](#))

2. Has the City been a good steward in using the grant funds?

Generally, yes. Throughout the procurement process the City worked to advance shared interests and promote equitable delivery of government benefits and opportunities within State House District 111. However, plans to use the \$3.5 million originally appropriated for a digital sign were not finalized until August 4, 2025—approximately three years after the grant was accepted by City Council—when Amendment No. 2 to the grant agreement was executed. (See [Objective II.](#))

Recommendations

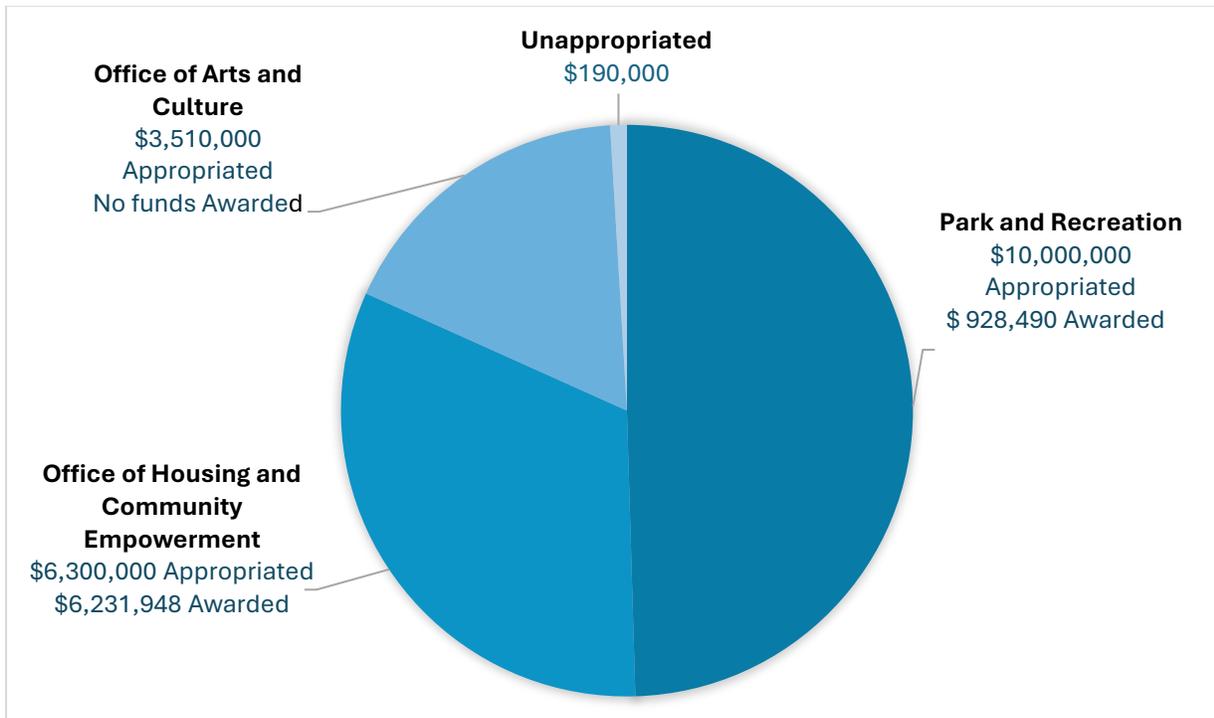
There were no reportable observations or recommendations.

Audit Results

Objective I: Compliance with Procurement and Administration Requirements

Exhibit 1 shows how the City has appropriated and awarded¹ the Texas Parks and Wildlife Department grant funds as of December 31, 2024.

Exhibit 1: Appropriations and Awards by Office and Department

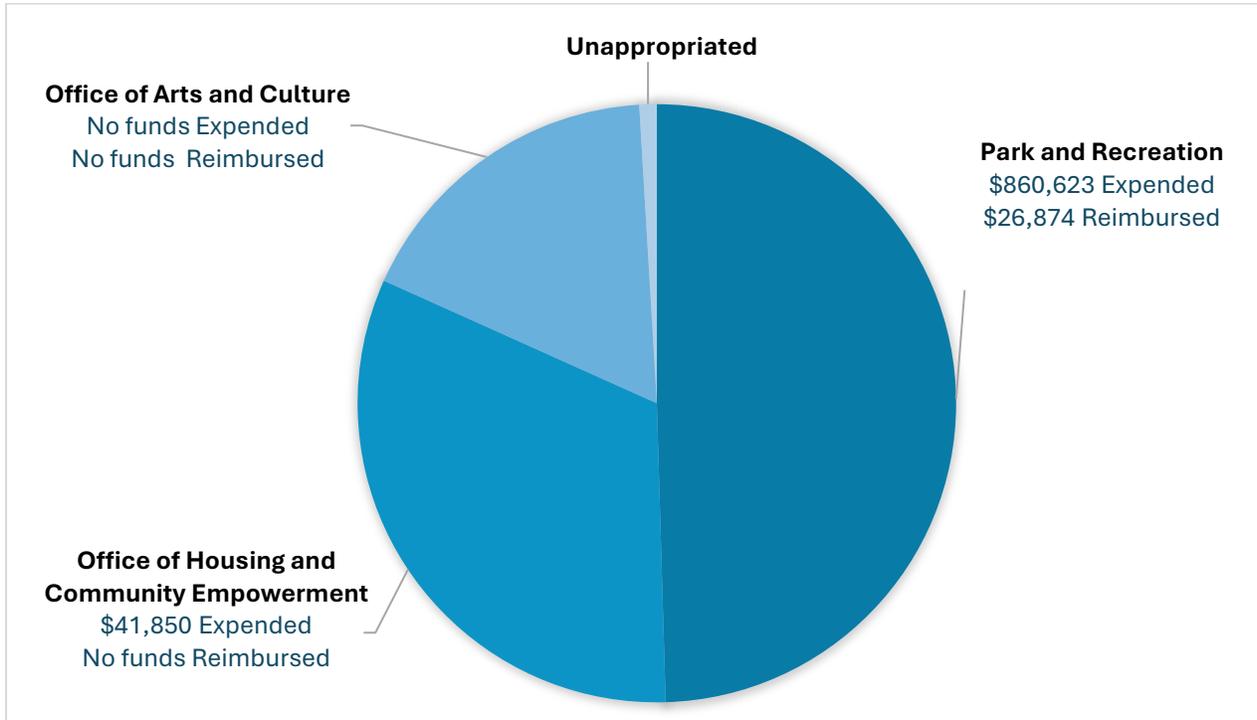


Source: Office of Budget and Management Services, Park and Recreation, Office of Housing and Community Empowerment, and Office of Arts and Culture.

¹ **Appropriation** means a grant of money made by the legislature for a purpose other than the payment of a judgment or a preexisting debt incurred by the state (Texas Local Government Code Title 3, Subtitle B, Chapter 317, Subchapter A). Federal **award** means the assistance that a recipient receives or administers in the form of grants, cooperative agreements, non-cash contributions, or other assistance. (C.F.R. § 200.1)

Exhibit 2 shows the Texas Parks and Wildlife Department grant funds expended and reimbursed by office and department as of December 31, 2024.

Exhibit 2: Expended and Reimbursed by Office and Department



Source: Office of Budget and Management Services, Park and Recreation, Office of Housing and Community Empowerment, and Office of Arts and Culture.

The selection procedures for the amount awarded by Park and Recreation and the Office of Housing and Community Empowerment as of December 31, 2024, were reviewed for compliance with Administrative Directive 4-05, Contracting Standards and Procedures, applicable federal and state laws, and departmental policies and procedures. See **Exhibit 3** for the results.

Exhibit 3: Compliance Procedure Audit Results

Compliance Procedure	Results
The scope of work/specifications/service provided were written in a manner that promotes competition and competitive pricing.	No Exception
The specification identifies the criteria to determine that a proposal is responsive and responsible.	No Exception
The specifications were posted for a reasonable period of time on the City's solicitation system.	No Exception
Nondisclosure and conflict-of-interest forms for subject matter experts were obtained, and policy language was included in the scope of work/specifications.	<p>Exception Noted</p> <p>No signed nondisclosure and conflict of interest forms were provided for the proposal evaluators for Park and Recreation.</p>
The review and evaluation process confirmed the highest ranked consultants and appropriately documented the determination.	<p>Exception Noted</p> <p>While Park and Recreation selected the three highest-ranked landscape architectural firms, the evaluation process did not fully follow the criteria identified in the Request for Proposal. The evaluation did not include the "ability to achieve sustainable development goals" criterion identified in the Request for Proposal. Therefore, the point value assigned to the "ability to achieve sustainable development goals" was redistributed to two other criteria to reach 100 points.</p> <p>Management's Response</p> <p>The Request for Proposal did not specifically request the landscape architectural firms to address the "ability to achieve sustainable goals." As a result, Park and Recreation adjusted the evaluator's sheet point values accordingly to reach the evaluator criteria scoring total points of 100.</p>

Compliance Procedure	Results
	<p>Exception Noted</p> <p>At the time contracts were awarded to the three highest-rated landscape architectural firms, Twin Falls Park was moved from Group 3 to Group 1. The Request for Proposal required a separate proposal for each group. The Request for Proposal had Twin Falls Park in Group 3. No documentation was provided to explain the reason for the change at the time of the award nor was documentation provided to demonstrate Director or City Council approval of the change.</p> <p>Management's Response</p> <p>Upon review of the group scopes, and to moderate the increase of design scope at Thurgood Marshall project, it was determined that design consistency and cost efficiency would be better addressed by moving Twin Falls project from Group 3 to Group 1. All four (4) parks in Group 1 have identical scopes of work, share a general physical similarity, and all are located within two (2) miles of each other, creating further synchronicity of budget, design, and construction feasibility.</p> <p>As an athletic field, Group 3 has a very different scope and budget from the Group 1 projects. It requires very different design and construction techniques. Repositioning the Twin Falls project to Group 1 allowed the City to minimize and focus design scope for Group 3, reducing the overall fee and optimizing the development schedule of that specific park project.</p>

Compliance Procedure	Results
	<p>Additionally, the Request for Proposal contains language that states:</p> <p>“After the issuance of this Request for Proposal, the Park and Recreation Department reserves the right to amend it, waive any requirement or irregularity, request modifications to proposals, provided that all firms are treated equally. The Park and Recreation Department further reserves the right to award the contract for this project as deemed in its best interest, and to request changes in the composition of any team.”</p> <p>As documented, Park and Recreation discussed and notified the consultant firms awarded Group1 and Group 3 of the change before fee proposals were obtained.</p>
The City’s Business Inclusion and Development policies outlined by City Council were followed by the Park and Recreation.	No Exception
Administrative actions process is properly followed to increase contract amounts previously awarded.	No Exception
As a grant subrecipient of the Texas Parks and Wildlife Department Coronavirus State and Local Fiscal Recovery Funds Program, the City’s reporting and regulations requirements are with the Texas Parks and Wildlife Department not the federal government. Quarterly reports are submitted to the Texas Parks and Wildlife Department and cover the progress made during the quarter, and expectations of meeting the project goals, using the complete grant amount and completion date.	No Exception

As of the end of the audit period December 31, 2024, the City complied with the City's procurement and grant fund administration requirements, and the Texas Parks and Wildlife quarterly reporting requirements, except as noted above.

Objective II: City's Steward of Grant Funds

To determine if the City has been a good steward of the grant funds the following procedures were performed.

- Interviewed City management and staff from the relevant departments and offices (Park and Recreation, Office of Housing and Community Empowerment, Office of Arts and Culture, and Office of Budget and Management Services) to understand:
 - Rationale for the procurement process used.
 - Interactions with the State House District 111 representative.
 - Causes of delays in the original estimated timelines for each stage of the funds appropriated to them.
 - The intended goals of the funds appropriated to their office or departments.
- Reviewed presentations made to City Council to assess project status, identify causes of any delays, evaluate accuracy of the information presented, and note feedback received.
- Requested and reviewed feedback received from the Texas Parks and Wildlife Department related to improper use of the grant funds and refund requests.

As of the end of the audit period December 31, 2024, the City has proceeded in a manner that indicates the City has been a good steward of the grant funds, except as follows:

- Plans to use the \$3.5 million originally appropriated for a digital sign were not finalized until August 4, 2025—approximately three years after the acceptance of the grant by City Council—when Amendment No. 2 to the grant agreement was signed. The funds are planned to be used at the African American Museum to:
 - Digitize, inventory, and rehouse archival and art collections.
 - Improve security systems.
 - Modernize the *Facing the Rising Sun* exhibition with digital and interactive elements to improve accessibility.
 - Expand educational programming, workshops and community engagement initiatives.

Methodology

The audit methodology included: (1) interviewing personnel from Park and Recreation, Office of Housing and Community Empowerment, Office of Arts and Culture, and Office of Budget and Management Services and other City departments; (2) reviewing policies and procedures, Texas Local Government Code, applicable Administrative Directives, City Resolutions, and (3) performing various analyses. In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.

Government Auditing Standards Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our observations and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our observations and conclusions based on our audit objectives.

Report Classification

Final Report – For Public Use.

This report is a product of the Office of the City Auditor and is issued in accordance with the Texas Public Information Act (Texas Government Code, Chapter 552).

Major Contributors

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Appendix A – Acknowledgement Letter

Audit of Passed-through Texas Parks and Wildlife Department COVID 19 Coronavirus State and Local Fiscal Recovery Funds Grant

Management Acknowledgement Letter (see following pages)

Memorandum



DATE: March 26, 2026

TO: Mamatha Sparks – Interim City Auditor

SUBJECT: Response to Audit of Passed-through Texas Parks and Wildlife Department COVID-19 - Coronavirus State and Local Fiscal Recovery Funds Grant

This letter acknowledges the City Manager's Office received the *Audit of Passed-through Texas Parks and Wildlife Department COVID-19 Coronavirus State and Local Fiscal Recovery Funds Grant* and submitted responses in consultation with Park and Recreation, the Office of Housing & Community Empowerment (formerly the Office of Community Care and Empowerment), the Office of Arts and Culture, the Office of Budget and Management Services, and other City departments.

We appreciate the auditor's work. Departments have noted the few exceptions identified by the auditors and are committed to improving the future administration of passed-through funding.

Please let me know if you need additional information.

Service First, Now!

Kimberly Bizer Tolbert
City Manager

John Jenkins
Director, Park and Recreation

C: Jack Ireland, Chief Financial Officer
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Janette Weedon, Director, Office of Budget and Management Services
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