Austin
City Auditor's Office

Audit Report

Credit Cards

November 2026



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Austin uses credit cards more than other Texas cities and does not follow all best practices related to card access or training. Transaction documentation often does not show thorough review by City staff. Additionally, Austin's process does not include a consideration of whether purchases are an efficient use of public funds. These conditions increase the risk of fraud, misuse, and unnecessary spending.

Austin City Auditor's Office

Audit Highlights
November 2026

Credit Cards

Objective

Does the City manage credit cards according to policy and best practices?

What We Found

In fiscal year 2025, the City of Austin spent almost $45 million across 1,571 individual credit cards, not including Austin Energy cards. The City is an outlier compared to Texas peer cities in how it manages credit cards. We found three key areas where Austin's activities do not meet best practices and increase the risk of fraud, misuse, and unnecessary spending of public funds.

First, Austin has more credit cards and uses them more than peer cities. City staff favor using credit cards to help reduce their administrative burden. The City also earns rebates on credit card purchases. Best practices say organizations should periodically review the number of cards issued for necessity, but Austin does not do this. We determined that 27% of Austin's credit cards were used less than once a month in fiscal year 2025.

Second, Austin does not adequately train staff who play roles in credit card management. Best practices say organizations should train users thoroughly with periodic refreshers. Austin's training is one-time, outdated, and has gaps in several topic areas. Based on a staff survey, 37% of respondents reported they did not remember the training or thought it was not helpful. Respondents also highlighted several unclear City policy areas related to credit card use.

Third, the City's transaction monitoring is not robust. We looked at 120 transactions across four departments and noted about a third of the transaction documentation is unclear and does not demonstrate thorough review. In other transactions, we saw instances where some were not coded to the correct spending category. Also, it appears staff do not always consider cost efficiency in all purchases. These issues may decrease public trust that City staff are spending public funds responsibly.

What We Recommend

We recommend the Director of Austin Financial Services take several steps to clearly define and improve the credit card program. Specific actions include implementing a process to review and revoke cards that are underutilized or not needed, updating the City's initial training and adding an annual refresher training, revising City policies to strengthen the effectiveness of transaction documentation and reviews, and implementing a strategy to identify cost-saving opportunities in credit card purchases.

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Cover: Credit Card Chip. Photo by Michael Kuhn.

Objective

Does the City manage credit cards according to policy and best practices?

Background

The City of Austin issues credit cards to staff through its ProCard (procurement card) program to streamline purchases in support of City functions. These credit cards are one of the primary vehicles used by City staff to spend City funds. In fiscal year 2025, the City had 1,571 individual credit cards assigned to City staff and spent almost $45 million on them.[1] These figures do not include Austin Energy (AE) credit cards.[2] During this audit, Austin Financial Services (AFS) was transitioning management of AE cards to be under their control. This audit focuses on AFS processes since they will manage all City credit cards moving forward. Because AE cards were managed separately during fiscal year 2025, AE activities were not included in this audit.

Responsibility for the City's credit cards is shared between AFS and City departments. AFS has a team dedicated to credit card management. This team distributes cards, provides guidance, and conducts high-level compliance audits. City departments have various staff with credit card responsibilities. Credit card users make purchases for business operations and submit documentation for approval. Credit card approvers, including cardholder supervisors and department accountants, review and approve submitted purchases.

Since 2020, the City Auditor's Integrity Unit (CAIU) has published several investigative reports related to the inappropriate use of City credit cards. In most of these cases, City staff exploited weaknesses in supervisory review or falsified supporting information. The results of these investigations highlight the importance of managing City credit cards to protect public funds.

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[1] In fiscal year 2025, Austin also had 137 contract and scoped cards which are named for a vendor or purchase category, such as AT&T. The City spent about $32 million on these cards. Since these purchases are limited to specific areas, this audit focused on Austin's individual credit cards.

[2] In fiscal year 2025, Austin Energy reported 237 individual credit cards were assigned to staff. AE reported about $10 million was spent on these cards.

Finding 1

Austin uses credit cards more than other Texas cities and does not follow best practices for managing credit cards, increasing the risk of fraud, misuse, and unnecessary spending.

Individual cards are cards assigned to City staff by name.

The City of Austin uses credit cards as a tool for purchasing goods and services in support of City functions and programs. We spoke with City staff who said they favor credit card use because it allows them to buy things more quickly and easily compared to other City purchasing methods. They also note the City receives a rebate on credit card purchases. In fiscal year 2025, staff reported the total rebate was about $1.2 million. However, benefits to high credit card use such as time saved or rebates may be offset by fraud, misuse, or unnecessary spending as detailed in this report.

Austin uses credit cards more than other cities in Texas. In fiscal year 2025, Austin had 1,571 individual cards and spent almost $45 million. These figures surpass all five peer cities we reviewed: Dallas, El Paso, Fort Worth, Houston, and San Antonio. To help normalize differences among cities for better comparison, we divided the total number of staff in each city by their number of individual credit cards issued. Using this ratio, Austin still has more cards than every other city with over three times more than Dallas and almost four times more than San Antonio. Also, Austin spent significantly more overall than the peer cities. We divided the amount spent by number of cards for the cities that reported their figures and noted Austin still spent about $5,000 more per card than the next city.

Exhibit 1: Austin is an outlier among Texas peer cities in the number of credit cards issued and the amount of money spent

City	Individual Cards Issued	City Staff per Card	Amount Spent (million)*	Amount Spent per Card
Austin**	1,571	~10	~$44.6	~$28,400
El Paso	449	~16	~$2.9	~$6,500
Fort Worth	436	~18	~$10.1	~$23,200
Houston	867	~26		
Dallas***	475	~32	~$8.4	~$17,600
San Antonio	370	~37		

* We were unable to collect this information from Houston and San Antonio.
** In Austin, for "Individual Cards Issued," this figure does not include Austin Energy cards which were managed separately during this audit. We also noted there may be a few contract and scoped cards in this figure that were labeled as individual cards. For "Amount Spent," this figure may include instances where City staff used their individual credit card to make contract or scoped purchases.
*** Dallas reported using 158 other cards for specific purchases such as travel.
Source: Austin City Auditor's Office (ACAO) analysis of issued credit cards and amount spent by Austin and Texas peer cities in fiscal year 2025, June 2026

We looked at three key areas related to the City's management of credit cards including granting access, providing training, and conducting monitoring. In each of these areas, the City does not follow all best practices. Doing so would provide confidence that credit cards are only held by staff that need them, that staff are educated on City policies, and that purchases are reviewed to ensure they are legitimate and an efficient use of public funds.

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Austin does not regularly review the need for all issued credit cards and does not revoke cards from staff who do not regularly use them.

The City has processes to distribute and revoke credit cards from staff. However, relaxed policies allow staff to keep cards they have been issued even though they may not need them. Austin's ProCard Policy Manual states that cards are taken away once a staff member has left their role or they can be taken away because of repeat policy violations. According to best practices, the City should also require a periodic review of cards to identify those that are not regularly used or have not been used at all. Three of the five Texas peer cities follow this best practice by requiring an annual review process or a process to deactivate cards for inactivity.

Best practices come from the Office of Management and Budget and the Council of the Inspectors General on Integrity and Efficiency. Peers that follow these practices include Dallas, Fort Worth, and San Antonio.

In Austin, department management is responsible for determining how many credit cards are needed for effective City operations. They are also responsible for protecting public funds. We analyzed City credit card use to determine how often cards were used by staff. At least 27% of Austin's cards were used less than once a month. It is likely that removing cards used less than once a month would not significantly affect City operations. Management is best able to determine where that line should be drawn. However, continuing to grant access to underused cards exposes the City to more chances for inappropriate use and unnecessary financial loss.

Exhibit 2: Over 400 of Austin's credit cards are used less than once per month

Card Used Less than Once Every:	Number of Cards	Percent of All Cards
Quarter (less than 4 times a year)	159	10%
Month (less than 12 times a year)	419	27%
Two Weeks (less than 26 times a year)	682	43%
Week (less than 52 times a year)	941	60%

Source: ACAO analysis of Austin's credit card utilization in fiscal year 2025, July 2026

Austin does not ensure that users are trained on how credit cards should be used.

Best practices come from the Government Finance Officers Association (GFOA) and the Association of Certified Fraud Examiners.

Best practice guidance says an organization's credit card program should define what purchases are allowable and require periodic training for users. This training should cover several areas, including roles, documentation, approvals, and consequences for not following policies. All the Texas peer cities that we looked at require both initial and periodic refresher training. However, Austin only requires initial training.

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Exhibit 3: Austin does not require periodic refresher training like peers

City	Initial Training	Refresher Training Annual or Every Two Years*
Austin	✓	✗
Dallas	✓	✓
El Paso	✓	✓
Fort Worth	✓	✓
Houston	✓	✓
San Antonio	✓	✓

* Houston requires refresher training every two years. All other peers require annual refreshers.
Source: ACAO analysis of training requirements by Austin and Texas peer cities, July 2026

The Works system is used to document, submit, and approve credit card transactions.

In Austin, users must complete the initial training before being issued a card or getting access to the Works system. We took this training and noted it focuses on the mechanics of the Works system and does not include substantive information on card use policies. When we spoke to City staff, they said gaps in training lead to issues with credit card use, such as poorly documented transactions or late approvals. We also learned some departments have created their own training courses to supplement guidance the City's initial training does not provide.

Austin's training does not provide specific guidance for a cardholder to assess whether using a credit card is appropriate and necessary. For example, before using a card, staff may question whether a purchase should be made using a credit card as well as what they are allowed to buy. Having clear answers to these two questions would help staff better understand their role and should help limit any unallowable or questionable purchases. While Austin provides some guidance related to allowable and unallowable purchases, AFS staff noted that having relaxed guidance allows departments flexibility to make purchases based on their needs.

In our survey of Austin credit card users, 37% (285 of 769) of respondents reported they did not remember the training or noted it was not helpful. In other words, about 4 of every 10 credit card users did not benefit from the City's initial training. We also asked respondents to identify policies they found unclear. The responses indicate gaps in knowledge as not all staff

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fully understand the City's credit card policies well enough to effectively implement them.

- 16% (118 of 728) reported being unclear on what is and is not allowed to be purchased,
- 17% (123 of 728) reported being unclear on transaction limits and contracting requirements,
- 12% (86 of 728) reported being unclear on policies on transaction documentation, and
- 21% (151 of 728) reported being unclear on policy non-compliance and consequences.

Austin's credit card transaction documentation is sometimes unclear.

Best practices come from the Government Accountability Office and the GFOA.

Best practices note the importance of having safeguards against inappropriate purchases using credit cards. Clear documentation, separation of duties, and monitoring are all measures that can help protect City credit cards against inappropriate purchases. Austin's credit card monitoring structure has multiple department reviewers. Transactions are reviewed by the cardholder, the cardholder's supervisor, and the department accountant. Texas peer cities have similar monitoring structures. Dallas and San Antonio have also incorporated additional periodic checks of all transactions by a designated reviewer within the department.

We analyzed 120 transactions across four Austin departments to determine how well department staff documented and monitored transactions.[3] We could not easily interpret some transaction descriptions. These unclear descriptions caused challenges when we compared the purchase description to a receipt. Lack of clear documentation does not demonstrate that these transactions were properly reviewed and approved when they were made. Of the transactions we reviewed:

- 21% (25 of 120) did not have a clear description of what was bought,
- 35% (42 of 120) did not have a clear description of the business need for the purchase, and
- 32% (38 of 120) had descriptions that only partially matched or did not match the receipt.[4]

Department accountants conduct a high-level review of transactions. We asked them about our observations of unclear transaction documentation. Most accountants felt their primary role is to check that transactions have supporting documentation and an assigned purchase category. Accountants did not see their role as ensuring the purchases were clear and necessary, instead deferring to the supervisor's review and judgment. They also cited high workloads as a contributing factor for the unclear documentation.

[3] Department staff are responsible for ensuring all transactions are justified, documented, and approved. AFS staff audits a sample of department transactions for compliance each month.

[4] Unmatched receipts were mainly due to purchase descriptions where a blanket statement such as "supplies" was used to describe the purchase of numerous different items.

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Based on City data, department accountants approved as many as 7,381 transactions each in fiscal year 2025. On average, each accountant approved 1,253 transactions. Supervisors, the first-level review of cardholder purchases, approved as many as 2,070 transactions each in fiscal year 2025. Additionally, 4,541 City transactions were auto-approved. This means the transaction did not have a first-level review and went straight from the cardholder to the accountant. As the final sign-off reviewer, if accountants do not question unclear documentation, the City's review process effectively becomes a single review.

GFOA best practices cite the importance of documenting the purpose and use of a purchase to enhance and preserve public trust. In Austin, credit card transactions are subject to open records requests. Later this year, the City plans to proactively post that data publicly. Based on our observation, some Austin transactions are not documented in a way that would reassure the public that all City credit card spending is needed or appropriate.

Exhibit 4: Some City credit card documentation does not clearly explain what was bought or why it was needed

City staff's description of what was bought:	Cost
"PDC Coffee Supplies"	$1,521
"automatic toll charge"	$1,050
"out on leave"	$285
"video"	$168

Source: ACAO analysis of City documentation in the Works system, June 2026

Austin does not analyze overall credit card purchase information and cost-efficiency does not seem to be a primary focus.

In addition to the monitoring challenges noted above, we did not identify anyone in the City responsible for reviewing overall spending on credit cards. A Citywide analysis of credit card spending could help City management identify areas where common items are bought across departments. It could also help identify different ways the City can buy these goods and services on better terms.

We analyzed Austin's credit card data to see if we could better understand the spending. Two of the top three purchase categories were generic. That is, these categories do not provide specific insights into what goods and services were bought:

- $4.2 million was coded to "small tools/minor equipment,"
- $2.8 million was coded to "services-other," and
- $2.5 million was coded to "educational travel."

Also, not all City purchases may be coded correctly to provide accurate insights about what goods and services were bought. For example, we observed instances where the item description did not match the purchase category, including the following examples.

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Exhibit 5: Some City credit card purchases do not appear to be assigned to the correct purchase category

City Staff's Purchase Item Description	City Staff's Assigned Purchase Category
"6542 – Step Stool – Office Supplies"	*"clothing/clothing material"*
*"JSOM Subscription"**	*"clothing/clothing material"*
"Chat GPT"	*"clothing/clothing material"*

* This purchase appears to be for a medical journal subscription.
Source: ACAO analysis of City documentation in the Works system, June 2026

We also asked staff that play a role in the City's purchase management process whether cost-savings is a consideration in credit card purchases. Generally, staff noted responsibility lies at the department level, and noted spending decisions focus on staying within established budgets:

- Department accountants said they do not review how much an item costs as part of their process, and cost-appropriateness should be determined by the purchaser and supervisor.
- Department financial staff, including a financial manager and a chief administrative officer, said purchase costs are determined by operations staff, and any review of spending is done from the perspective of staying within budget.
- AFS staff said they trust departments to justify their activity.
- Austin Budget and Organizational Excellence staff said departments hold the responsibility to detect unusual purchases, and formal oversight occurs when departments are near their budget limit.

AFS staff said they have done a review of purchases to see if using a contract might work better. However, they noted this type of review does not happen regularly.

Departments we spoke to did not have practices to assess their credit card spending for efficiency, nor does AFS do this Citywide. In our analysis of credit card spending categories, we noted a category for toll road charges and explored how those purchases are managed. In fiscal year 2025, Citywide credit card spending on tolls was about $863,000. About $560,000 (65%) was spent by two departments. According to department staff, neither department had done a formal cost-benefit analysis to determine whether money spent on tolls was cost-effective. Additionally, neither department reported regularly reviewing nor assessing toll use by staff.

Austin's approach has contributed to financial losses across departments.

Austin staff have access to credit cards and use them more than peer cities. Guidance to inform users about their proper use is limited, as is monitoring to ensure the spending is needed, allowed, and justified. While the City has rules in place, those rules do not include all aspects of best practice guidance. As such, the City is not doing all it can to protect public funds, and the City's current approach has real consequences. The City Auditor's Integrity Unit (CAIU) has issued multiple recent investigative reports detailing weaknesses that have resulted in substantial losses:

- A 2020 report detailed a City staff member using their City credit card to purchase at least $1.3 million in goods for personal use by exploiting weak reviews.

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- A 2023 report detailed a City staff member using their City credit card to purchase goods for personal use by submitting falsified documentation.
- A 2024 report detailed a City staff member using their City credit card to purchase goods for personal use by submitting falsified documentation.
- A 2025 report detailed a City staff member using their City credit card to pay for services on private property and to support a non-profit organization, bypassing purchasing rules.

A stronger framework for Austin's credit card program – that regularly reviews and limits card access and regularly trains users – will help ensure that only those who need cards have them, and they know how to use them properly. Also, more detailed and robust monitoring that considers cost effectiveness should increase trust that City staff are doing all they can to ensure public funds are spent properly.

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Recommendations and Management Response

1 To ensure Austin's credit cards are only held by active users who need them, the Director of Austin Financial Services should implement a process to review and revoke cards that are underutilized, at least on an annual basis. This strategy should be documented and include a clear definition of what level of use is considered underutilized.

Management Response: Agree

Proposed Implementation Plan: AFS will revise its purchasing card policy to require an annual review of all purchasing card accounts and establish documented usage thresholds to identify underutilized cards.

Cards identified as low-use or no-use will be evaluated for ongoing business need. As a general practice, AFS will recommend that departments retire cards with little or no activity to reduce risk and ensure card access is limited to employees with a demonstrated business need.

Departments may request exceptions for underutilized cards when a legitimate operational need exists, such as emergency response, seasonal programs, or other infrequent but essential business functions. Requests for continued retention will require written justification.

The revised policy will define the review process, documentation requirements, response timelines, and follow-up actions for underutilized cards. AFS will communicate these requirements to departments and maintain documentation supporting card retention or cancellation decisions resulting from the annual review.

Proposed Implementation Date: October 2027

2 To ensure City staff are educated on the appropriate use of Austin's credit cards, the Director of Austin Financial Services should revise the initial training and develop and implement recurring annual refresher training for all users. The trainings should include guidance on all aspects of Austin's credit card process to enable City staff to use credit cards appropriately, document and justify purchases, and ensure all levels of monitoring are working as intended.

Management Response: Agree

Proposed Implementation Plan: AFS will enhance its purchasing card training program by updating the initial training and implementing a mandatory annual refresher training for all users with purchasing card responsibilities. The updated training will incorporate relevant audit findings and recommendations.

The revised initial training, delivered through authorized training platforms, will provide instruction on purchasing card requirements, documentation and purchase justification standards, role-specific responsibilities, approval expectations, fraud awareness and detection, internal controls, monitoring responsibilities, compliance with City procurement policies and procedures, and the consequences of noncompliance. Training will also incorporate practical examples and scenarios to reinforce appropriate decision-making.

AFS will implement a mandatory annual refresher training for all cardholders, approvers, and accountants. The annual training will reinforce key program requirements, communicate policy and procedure updates, and address recurring compliance issues and emerging risks. Completion of the training will be required to maintain purchasing card privileges and associated system access.

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AFS will establish training completion deadlines and corrective actions for individuals who do not meet training requirements, including the potential suspension of purchasing card privileges or removal of associated system access. Training requirements and standards will be communicated to all affected personnel and departments to support consistent compliance across the City.

Proposed Implementation Date: October 2027

3 To safeguard City resources from improper use, the Director of Austin Financial Services should strengthen monitoring by reviewing and revising current policies to:

- Clearly define allowable and unallowable purchases and documentation standards
- Clarify roles and responsibilities related to credit card transactions
- Ensure all transactions have two or more levels of review and eliminate auto-approved transactions
- Ensure updated guidance is communicated to stakeholders
- Assign responsibility to appropriate department staff to periodically assess and attest to whether the monitoring process is functioning effectively

Management Response: Agree

Proposed Implementation Plan: AFS will revise its purchasing card policies and related guidance to strengthen program oversight, clarify roles and responsibilities, reinforce documentation requirements, and enhance monitoring controls. Updated requirements will be communicated through policy revisions, training, and ongoing program communications.

AFS will continue efforts to reduce or eliminate shared and auto-approver cards and will review departmental approval structures to ensure all purchasing card transactions receive the required two levels of review and approval. Approval workflows will be evaluated periodically to ensure they remain appropriate as organizational structures and business needs evolve.

AFS will establish and communicate program-wide standards for documentation, approvals, monitoring, and internal controls. Departments will remain responsible for determining the appropriateness of purchases within their operational authority, while AFS will support compliance through policy updates, training, and guidance promoting the use of established procurement methods and contracts where appropriate.

To strengthen accountability and oversight, AFS will implement an annual departmental assessment process requiring designated department representatives to review purchasing card activity, evaluate monitoring practices, identify opportunities for improvement, and attest to the effectiveness of departmental controls. AFS will provide standardized reporting tools and guidance to support a consistent review process across departments.

Proposed Implementation Date: October 2027

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4 To ensure the City is focused on cost-efficiency, the Director of Austin Financial Services should implement a strategy to analyze credit card purchases on an annual basis to identify cost-saving opportunities. This strategy should be documented and communicated to the responsible individuals. Strategies can include, but are not limited to, working with stakeholders to review past purchases, identifying alternative ways to buy goods and services such as using contracts, forecasting future purchases, and ensuring staff consider cost-efficiency when making and reviewing purchases.

Management Response: Agree

Proposed Implementation Plan: AFS will implement an annual review of purchasing card spending across all City departments to identify off-contract spending and purchasing patterns that may support the development of future City contracts. Results will be shared with Central Procurement Category Managers and other stakeholders to support procurement planning, contract development, and strategic sourcing efforts.

AFS will also provide departments with annual purchasing card spending reports highlighting opportunities to reduce off-contract purchases, consolidate spending under existing or future contracts, and improve purchasing practices.

AFS will update the Procurement Manual, related guidance, and training materials to reinforce expectations that employees and approvers consider cost-efficiency and utilize existing contracts and established procurement methods whenever practical and in the best interest of the City.

AFS will also continue to support implementation of the City's new procurement system, including the planned contract marketplace module, which is expected to improve access to existing contracts and further encourage contract utilization for routine purchases.

Proposed Implementation Date: October 2027

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Scope

The audit scope included policies, procedures, and activities related to the the City's ProCard program managed by AFS for fiscal year 2025. This audit focused on purchases made on individual credit cards assigned to City staff by name. This audit did not include Austin Energy activities.

Methodology

To complete this audit, we performed the following steps:

- Reviewed City policies and guidance related to credit cards
- Researched best practices related to credit card management
- Interviewed ProCard program staff in the Austin Financial Services department
- Interviewed City staff in the Austin Budget and Organizational Excellence, Austin Facilities Management, Austin Parks and Recreation, Austin Public Health, and Austin Water departments
- Analyzed and assessed credit card transaction data from fiscal year 2025
- Analyzed and assessed credit card and expenditure data from fiscal year 2025
- Selected and reviewed a random sample of 120 transactions across the Austin Facilities Management, Austin Parks and Recreation, Austin Public Health, and Austin Water departments. We did not design the sample to be statistically significant, so the results cannot be projected to the population of transactions.
- Surveyed current City staff including department directors, credit card liaisons, credit card users, and credit card transaction approvers. We sent the survey to 2,060 users and received 769 responses for a response rate of 37%. The results of our testing apply to the responses received and cannot be projected to the total population.
- Collected and reviewed information about credit card practices in five Texas peer cities (Dallas, El Paso, Fort Worth, Houston, and San Antonio)
- Evaluated the risk of fraud, waste, and abuse related to the City's management of credit cards
- Evaluated internal controls related to the City's management of credit cards

Audit Standards

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 findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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The Austin City Auditor's Office was created by the Austin City Charter as an independent office reporting to City Council to help establish accountability and improve City services. We conduct performance audits to review aspects of a City service or program and provide recommendations for improvement.

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