Vermont Community Development Program

Single Audit Walk Through

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Learning Objectives

Participants will be able to identify:

- Why Single Audits are necessary
- When Single Audits need to happen
- Who is responsible for a Single Audit
- What is required in a Single Audit



- The Federal Government issued the Uniform Guidance Subpart F, 2 CFR 200, stating all recipients of federal funds must have a Single Audit conducted when their total federal grant expenditures are \$750,000 or more during a fiscal year.
- Specific Federal Funding Agency Requirements: Uniform Guidance: 2
 CFR Chapter I, Chapter II; and 24 CFR, Part 570 Housing and Urban
 Development, Community Development Block Grants
- https://www.govinfo.gov/content/pkg/CFR-2013-title24-vol3/pdf/CFR-2013-title24-vol3-part570.pdf



- State Requirements to Comply with Uniform Guidance:
 - Vermont State Bulletin 5
 - The policies & procedures that govern the issuance & monitoring of grant awards issued by the State
 - Requires Pass-through entities to monitor subrecipients' compliance



- State Grant Agreement reflects Uniform Guidance
 - Attachment C: Customary State Grant Provision
 - Attachment D: Other Provisions (CDBG Standard Provisions)
 - Attachment E: Certifications and Assurances federal requirement for funds



State Grant Agreement

- Is the legal instrument to secure federal funds
- Defines project terms and relationship between State Pass
 Through & Subrecipient are defined
- Expectations and responsibilities are laid out in the 'four corners" of document
- Before you Sign, Ask ?'s



Goal of Federal & State Requirements

- To Ensure accountability of public funds
- Share joint responsibility with Subrecipient for carrying out program activities and complying with federal & state laws and regulations.
- Documentation: Good record keeping is a must.



When do Single Audits happen?

With the Uniform Guidance, Compliance:

- Begins before the grant award, at the time of application.
- Requires States to use a Risk-Based Assessment to determine eligibility & highlight other risk factors of an applicant before an award is made.
- Carries on throughout the life of grant agreement.
- Continues until after final Financial Audit with Subrecipient Annual Report and a Single Audit, if required.



Who is responsible for an Audit?

- Partners are defined as:
- Pass Through Entity State Agency/Department/Grantor = Federal Funds are 'passed through' to the State of Vermont Agency-Department



- Subrecipient Municipal Grantees = are granted federal funds by a State Agency-Department
- State Pass Through Entity & Municipal Subrecipient enter into a Grant Agreement together



What is Required in a Single Audit? State

Compliance Requirements for State Pass-through entities:

- All agencies follow consistent procedures and grant agreements.
 *See attachments below
- The State Primary Pass-Through Agency is responsible to review status of Subrecipient Annual Report and any required Single Audit.
- Each State Agency/Department is required to create a Granting Plan.



Grant Agreement: Attachment C, 31A

- 31. Requirements Pertaining Only to Federal Grants and Subrecipient Agreements: If this Agreement is a grant that is funded in whole or in part by Federal funds:
 - A. Requirement to Have a Single Audit: The Subrecipient will complete the Subrecipient Annual Report annually within 45 days after its fiscal year end, informing the State of Vermont whether or not a Single Audit is required for the prior fiscal year.
 - If a Single Audit is required, the Subrecipient will submit a copy of the audit report to the granting Party within 9 months. If a single audit is not required, only the Subrecipient Annual Report is required.



Grant Agreement: Attachment C, 31A

31. A. continued

- For fiscal years ending before December 25, 2015, a Single Audit is required if the subrecipient expends \$500,000 or more in Federal assistance during its fiscal year and must be conducted in accordance with OMB Circular A-133.
- For fiscal years ending on or after December 25, 2015, a Single Audit is required if the subrecipient expends \$750,000 or more in Federal assistance during its fiscal year and must be conducted in accordance with 2 CFR Chapter I, Chapter II, Part 200, Subpart F.
- The Subrecipient Annual Report is required to be submitted within 45 days, whether or not a Single Audit is required.



Grant Agreement: Attachment C, 31B

B. Internal Controls: In accordance with 2 CFR Part II, §200.303, the Party must establish and maintain effective internal control over the Federal award to provide reasonable assurance that the Party is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the award.

These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States and the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).



Grant Agreement: Attachment D, XII. Audit(s)

10/27/22 Updated language:

XII. (A). Grantees must complete and submit the State of Vermont's **Subrecipient Annual Report annually within 45 days after the grantees fiscal year end**. All submissions of both original and revised Subrecipient Annual Reports must be submitted through the online form, and the **State is no longer accepting the Subrecipient Annual Report paper versions via mail or email**.

Grantees must go to this link to submit their original or revised Subrecipient Annual Reports at: https://finance.vermont.gov/suppliers-and-grantees, select 'Subrecipient Annual Report' link and complete the online form.

For Common Subrecipient Annual Report questions visit: https://finance.vermont.gov/training-and-support/faqs-and-glossaries/grants-faq/sar



Compliance Requirements for Municipal Subrecipients

- A **Subrecipient Annual Report** must be completed and submitted to the State within 45 days after fiscal year end; which reports all Federal funds expended. (State & Direct)
 - This determines if a **Single Audit** is needed.
- Single Audit must be submitted to <u>Federal Audit</u> <u>Clearinghouse</u> and to <u>all State Pass-through Agencies</u> within 30 days of completion.



Compliance Requirements for Municipal Subrecipients

Due within 30 days of auditor's report, or 9 months after fiscal year end to:

- 1. FAC: Federal Audit Clearinghouse https://harvester.census.gov/facweb/default.aspx/ The FAC operates on behalf of the OMB: Office of Management and Budget and is the primary place for Single Audit reporting; and to
- 2. Each State Pass-through Entity listed on your Subrecipient Annual Report
 - For a list of State Agency-Department contacts: https://finance.vermont.gov/sites/finance/files/documents/FIN-B5_Dept_Contact_List_0.pdf



200.508

The Auditee must:

- a. Procure or otherwise arrange for the audit...and ensure it is properly performed and submitted when due;
- b. Prepare appropriate financial statements, including the schedule of expenditures of Federal award;



- c. Promptly follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan
- d. **Provide auditor** with access to personnel, accounts, books, records, supporting documentation and other information as needed for the audit.



Properly Procuring an Auditor

- 2 CFR 200.509 (a) Auditor Procurement, is outlined below:
 - 1. Objective is to obtain high quality audits;
 - 2. Proposals for auditing services must have clearly defined objectives and scope;
 - 3. Auditee must request a copy of firm's peer review report;



- 4. Evaluate proposals based on:
 - Responsiveness to request for proposal
 - Relevant experience
 - Availability of staff with professional qualifications and technical ability
 - Results of peer and external quality control reviews; and
 - price



What is Required in a Single Audit?

Auditing

- Independent CPA examines financial systems and project compliance
- Audits required are based on the level of federal funds expended or incurred in one fiscal year
- Funds expended versus funds received, based on Grantees accounting system



What is Required in a Single Audit?

Schedule of Expenditures of Federal Awards = SEFA **200.510 (b)** Schedule of expenditures of Federal Awards at minimum, must include :

- 1. List Individual Federal programs by Federal Agency.
- 2. Federal awards received as a subrecipient
 - Name of Pass-through entity
 - b. Pass-through Grant number
- 3. Total Federal Award expended for each individual Federal Program, and the Code of Federal Domestic Assistance (CFDA) #



What is Required in a Single Audit?

- 4. Total Paid **out to subrecipients** from each Federal Program.
- 5. Speak to loans and loan guarantees, and
- 6. Notes to include accounting policies used and whether or not elected to use 10% de minimis Indirect cost rate
- * Examples below



Schedule of Expenditures of Federal Awards Key Parts

Schedule of Expenditures of Federal Awards must:

- 1. List Individual Federal Programs by Federal agency:
 - Housing and Urban Development (HUD)
- 2. Name and Grant Number when received as subrecipient:
 - a. Name: ACCD DHCD Dept of Housing & Community

 Development
 - b. Number: #07110-IG-2021-Municipality-000123



Schedule of Expenditures of Federal Awards Key Parts

Schedule of Expenditures of Federal Awards must:

- 3. Total Federal Award expended for each individual Federal Program, and the Catalog of Federal Domestic Assistance (CFDA) #: **CDBG = 14.228**
- 4. Total Paid out to subrecipients from each Federal Program.
- 5. Speak to loans and loan guarantees, and
- 6. Notes to include accounting policies used and whether or not elected to use 10% de minimis Indirect cost rate



Schedule of Expenditures of Federal Awards Example

Sample SEFA: Schedule of Expenditures of Federal Awards

City of Example Schedule of Expenditures of Federal Awards For the Year Ended December 31, 2016

Federal Agency					Expenditures			
(Pass-Through Agency)	Federal Program	CFDA Number	Other Award Number	From Pass- Through Awards	From Direct Awards	Total	Passed through to Subrecipients	Note
Highway Planning and Construction Cluster	r	10						100
Federal Highway Administration (fhwa), Department of Transportation (via WA State Department of Transportation)	Highway Planning and Construction	20.205	TAP- 7034(002)/LA- 8362	216,000		216,000	0	1,2
Federal Highway Administration (fhwa), Department of Transportation (via WA State Department of Transportation)	Highway Planning and Construction	20.205	STPUL- 7031(003)/LA- 8373	2,200,000		2,200,000	1,000,000	1,2
	Total Highway	Planning and	Construction Cluster:	2,416,000		2,416,000	1,000,000	
Highway Safety Cluster								
National Highway Traffic Safety Administration (nhtsa), Department of Transportation (via WA State Traffic Safety Commission)	State and Community Highway Safety	20.600	N/A	2,299		2,299	0	1,2
		Total Hig	hway Safety Cluster:	2,299		2,299	0	
Department of Homeland Security	Staffing for Adequate Fire and Emergency Response (SAFER)	97.083	2011-FH- 000439		198,900	198,900	0	1,2
		Total Feder	al Awards Expended:	2,418,299	198,900	2,617,199	1,000,000	



What is Required?

UG Subpart F. Auditees, 200.510, (b) 1-4 four (4) key parts can be found on the <u>State</u> of <u>Vermont Grant Agreement Detail</u>, <u>Part 1</u> cover page as highlighted in yellow in the example below:

- 1. Grant #
- 16. State Granting Agency:
- 31. Federal CFDA #: 14.228
- 32. Federal Program Title: CDBG
- 39. Federal Awarding Agency: HUD
- *Total Federal Expenditures by Grant Award
- *Funds Passed through to Subrecipient = Check Attachment A for a Subawardee



STATE OF VERMONT GRANT AGREE		Part 1	- Gran	t Award	Detail		
	N I - GENERA	L GRANT I					
¹ Grant #: 07110-PG-2016-Bristol-00003		² Original	x	Amendmer	nt #		
3 Grant Title: Bristol Family Housing Feasibility							
⁴ Amount Previously Awarded: \$ 0.00	³ Amount Aw	Amount Awarded This Action: 6 Tot			tal Award Amount: \$ 30,000.00		
⁷ Award Start Date: 10/20/2016 ² Award	d End Date: 12/	31/2018	⁹ Subrecipi	ent Awa	rd: YES	NO 🗌	
¹⁰ Vendor #: 399 21	Town of Brist	ol					
¹² Grantee Address: PO Box 249, 1 South Street							
¹³ City: Bristol		14 State: VT 13 Zip Code: 05 443					
¹⁶ State Granting Agency: Agency of Commerce a	and Community	Community Development-DHCD			¹⁷ Business Unit: 07110		
¹² Performance Measures: ¹⁹ Match/In-Kind: 9 YES ☑ NO ☐ Budget, 4. Sources		iption: See	Attachment	B - Paγr	nent Provi	sions and Pr	oject
²⁰ If this action is an amendment, the following Amount: Funding Allocation:		mance Perio	d: 🗌	Sco pe d	of Work: [Ot	her:
SECTION I	I - SUBRECIPI	ENT AWAF	RD INFORM	ATION			
²¹ Grantee DUNS #: 80 5663 79 6	22	22 Indirect Rate: N/A			28 FFATA: YES NO		
²⁴ Grantee Fiscal Year End Month (MM format): δ/	30	[A pproved rate or de minimis 10%]			25 R&D:		
²⁶ DUNS Registered Name (if different than VISLON	Vendor Name in	80x 11):					
SEC	CTION III - FU	NDING AL	LOCATION				
	STA	TE FUNDS					
Fund Type	²⁷ Awarded Previously	²³ Award This Actio			^{so} Special & Other Fund Descriptio		Descriptions
General Fund	\$0.00	\$0.0	00	\$0.00			
Special Fund	\$0.00	\$0.0	00	\$0.00			
Global Commitment (************************************	\$0.00	\$0.0	00	\$0.00			
Other State Funds	\$0.00	\$0.0	00	\$0.00			
FEDERAL (includes subrecipient Glob	funds)	unds)			Required Federal Award Information		
CFDA **********************************	55 Awarded Previously	44Award This Actio			59FAIN	≦²Federal Award Date	^{sa} Total Federal Award
14.222 Community Development Block Grant [CDBG]	\$0.00	\$30,000	00 \$30	.000.00	8.16.DC.50.0 001	7/22/2016	\$30,000.00
²² Federal Awarding Agency: U.S. Department of Housing and Urban Development (HU	, D)	** Federal i	Award Project	Descr:			
	\$0.00	\$0	.00	\$0.00			\$0.00

When a Single Audit is required, Upload Plan and Single Audit to Gears

- Single Audit Plan Required SA-2022-Municipality-000XX
- Single Audit Plan due within 10 days of Single Audit
 Open status. Change status: Submit Single Audit Plan
- Single Audit Submit due within 30 days after
 Auditor's Report or no later than 9 months after end
 of fiscal year. Change status: Submit Single Audit

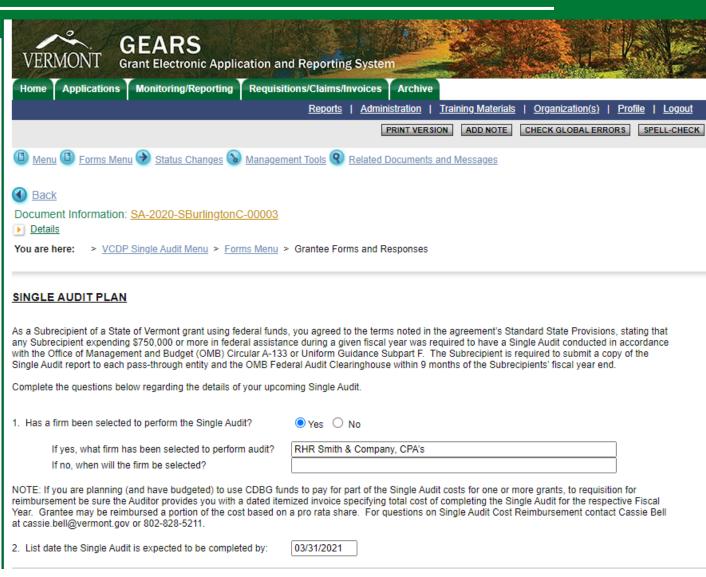


When a Single Audit is required, Complete Single Audit Plan

Single Audit Plan

- Has Firm been selected to perform the Single Audit? Yes or No
 If Yes, what firm selected?
 If No, when will firm be selected?
- 2. List date the Single Audit is expected to be complete by:





When a Single Audit is required, Upload Single Audit

Single Audit

- Date Auditor completed SA:
- Date SA was submitted to FAC
- Do you plan to requisition CDBG funds to pay for part of SA costs?
- Upload Single Audit & Financial Statements package, including any findings, Corrective Action Plan, etc.

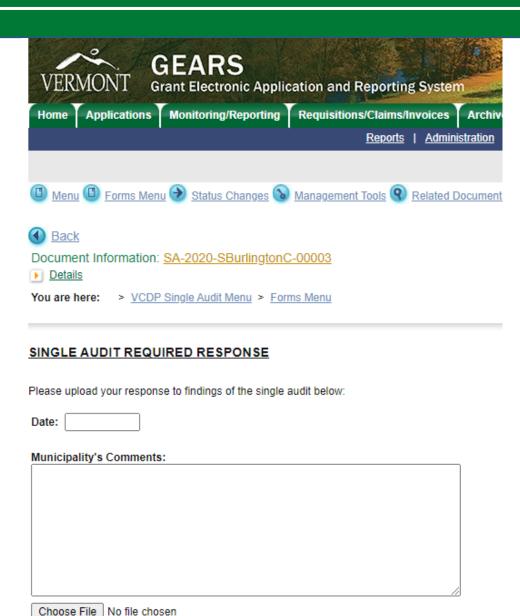


Document Ir Details	nformation: <u>SA-2020-SBurlingtonC</u>	C-00003		
	VODD Girola Audi Marris San	M Ot 5		
You are here:	> VCDP Single Audit Menu > For	ms Menu > Grantee F	orms and Responses	
_				
SINGLE AU	DIT UPLOAD			
Please comple	ete the following information, save a	nd then change the st	atus to "Single Audit Su	bmitted".
Date Auditor co	ompleted Single Audit:			03/02/2021
Date Single Au	dit was submitted to Federal Audit Clea	aringhouse:		03/23/2021
Do you plan to	requisition CDBG funds to pay for any	part of the Single Audit	costs?	○ Yes
If yes, creat	e a requisition for each CDBG grant	listed on the Single A	udit Schedule of Expend	
Audit cost:	ards (SEFA) and provide the following	g for reimbursement o	or a pro rata snare of the	Single
1. From th (SEFA) pa	e completed Single Audit, a copy of the	complete Schedule of	Expenditures of Federal A	wards
2. The Aud	ditor's dated itemized invoice specifying	total cost of completing	the Single Audit for respe	ective
Fiscal Yea 3. The Mu	r. nicipality's calculation for the prorata sh	are of Single Audit cost	s based on the SEFA for e	each
grant.	ed check the Town used to pay the Sing	ulo Audit bill		
4. Cancele	d check the fown used to pay the Sing	ne Audit bill.		
Single Audit [Occumentation			
Please upload	below, the complete Single Audit & Fir	nancial Statements pa	ckage and include:	
* Single Au	udit - Any findings, Corrective Action Pla			
	Statements tional documentation generated such as	s the Auditor's Commun	ication Deficiencies	
Single Audit [Ocument(s) (each upload limited to 20	mb) Please indicate w	hat is being uploaded in D	ocument Name field:
Document Nan			Choose File No file ch	
	12-SouthBurlingtonCityFS20Final.pdf			
Document Nan	16:		Choose File No file ch	osen
Comments:				

When a Single Audit is required, Upload Corrective Action Plan to Gears

- If any Single Audit findings:
 - Provide a <u>Corrective Action Plan</u> on Municipalities letter head to Auditors for Single Audit package.
 - Primary State Agency/Department may also issue a Management Decision Letter requesting a Corrective Action Plan on Municipalities letter head to address outstanding issues such as Schedule of Expenditures of Federal Awards or SEFA issues.



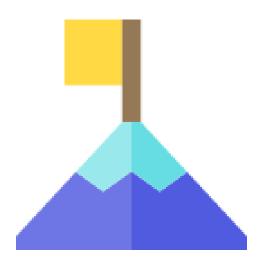


Review of Audit Overview

- Why? *OMB Uniform Guidance (replaced A-133); State of Vermont Bulletin 5 & Grant Agreement outlines rules to ensure accountability of public funds When?*Begins at application, through grant agreement, until after final Financial Audit
- What? *Timely and accurate completion of: Subrecipient Annual Report (for all Subrecipients), Single Audit & Schedule of Expenditures of Federal Awards documents evidence of rule following
 - *Establishes & maintains adequate financial management system & strong internal controls;
- Who? (is responsible) *Partners: State Agency Pass Through Entity (Grantor) and Municipal Subrecipient Treasurer or lead Financial staff.



For Success, areas to Avoid

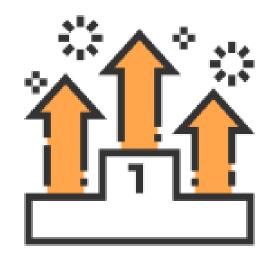


- Commingling funds from one program to another
- Supplanting existing funds with federal funds
- Lack of written procedures and/or employees who are not aware of procedures
- Not checking the federal suspension and debarment when procuring goods and services
- Not competitive in procurement



Most successful Subrecipients

- Reads the grant thoroughly & follows it.
- Asks Questions Early and Often
- Strong Internal Controls Prevents Common findings
- Establishes & maintains an adequate financial management system – effective control and accountability for federal funds, property and other assets
- Timely and accurate completion of Subrecipient Annual Report; Single Audit with Schedule of Expenditures of Federal Awards, if required





Resources

Must Do & How To Handout



Obtain a SAM UEI Numb	er:		
How do I get a SAM →	Acc	ess: https://sam.gov/content/duns-uei UEI is a 🗦 How long does this 🗦 5 bus	iness days
Unique Entity ID	12 c	haracter alphanumeric ID assigned to an entity step usually take?	
number?	by S	AM.gov. Select Public view	
Register with SAM.GOV	– an	nnual registration required	
low do I register with the	e	Access: https://sam.gov/content/entity-registration You'll How long does	10 business
ystem for Award		→ need the authorizing official of your organization (best → this step =	days
Management (SAM) if I		practice: assign at least 2 people to Entity Administrator for usually take?	
vant to apply or bid direc	tly	backup to entity renewal), an Employer Identification Number	
or federal awards?		(EIN) etc. And select <u>Public</u> view.	
Submit Subrecipient Ann	nual	Report – annually when receiving any federal funds -*NOTE NEW ONLINE FORM AS O	F 7/1/22
How do I submit a			ries: allow time
Subrecipient Annual	→		complete online
Report to the State of			m and submit.
/ermont?		complete the online form	
Submit Single Audit repo	ortin	ng package <u>to:</u> 1. FAC & 2. all State of Vermont granting agencies whose grant funds yo	u expended
low do I submit a Single		Due within the earlier of 30 days after receipt of auditor's How long does this	5-7 business
Audit to the <u>Federal</u>	→	report, or 9 months after end of the fiscal year. step usually take?	→ days (more if
Audit Clearinghouse	-	Access: https://harvester.census.gov/facweb/default.aspx/	new account
FAC)?		and create an account if you are not already a current user.	
		*If due date falls on a Saturday, Sunday or Federal holiday,	
		reporting package is due the next business day.	
	1 . 7	Required components checklist for the Audit Package at:	
	>	https://facides.census.gov/Files/2019-	
		2021%20Checklist%20Instructions%20and%20Form.pdf	
How to submit a Single		Contact State of Vermont Department contacts at: How long does this	Varies: allow
Audit to State of VT	>	 https://finance.vermont.gov/sites/finance/files/d → step usually take? 	→ time to
ranting agar	3 1	ocuments/FIN-B5 Dept Contact List.pdf	
randing agency whose	1 1		complete and
		Submit Single Audit to each department contact via email	complete and email.
		Submit Single Audit to each department contact via email	
funds we expended?		Log onto GEARS at: https://egrants.vermont.gov, go to	
unds we expended?	→	Log onto GEARS at: https://egrants.vermont.gov, go to blue banner, Organization(s) → Organization Documents →	
unds we expended?	→	Log onto GEARS at: https://egrants.vermont.gov, go to blue banner, Organization(s) → Organization Documents → scroll down to SA-2022-NAME-000XX	
unds we expended? How to Submit a Single Audit to ACCD-DHCD	→	Log onto GEARS at: https://egrants.vermont.gov, go to blue banner, Organization(s) → Organization Documents → scroll down to SA-2022-NAME-000XX When to submit Plan?	email.
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dunds we expended? How to Submit a Single Audit to ACCD-DHCD A. Single Audit Plan for Single Audit: confirms understanding of Single		Log onto GEARS at: https://egrants.vermont.gov , go to blue banner, Organization Documents ⇒ scroll down to SA-2022-NAME-000XX A. Single Audit Plan Due within 10 days of Single Audit Open status. Change status to submit Plan	Due within 1 days of Single Audit Open sta

Single Audit Questions

Thank You

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Phone: 802-828-5211

