





 **Uniform Guidance for Federal Awards: How Clients will Need to Monitor Subrecipients Going Forward**

October 15, 2014




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Presenters



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Candor. Insight. Results.



Kevin Smith, CPA



What will we cover


- ▶ Background and Overview of New Subrecipient Monitoring Requirements
- ▶ Subrecipients versus Contractors
- ▶ Roles & Responsibilities of Pass-Through Entities and Subrecipients
- ▶ Risk Assessment Considerations
- ▶ Auditor Considerations
- ▶ Relevant questions contained in the recently released Council on Financial Assistance Reform (COFAR) frequently asked questions (FAQ) document
- ▶ Preparing for the Uniform Guidance

For More Information on Cost Principles and Other Administrative Requirements

- ▶ **October 24, 2014, CPE rebroadcast of recent GAQC Web Event, *Uniform Guidance for Federal Awards: The New Cost Principles, Time and Effort Reporting, Procurement and Other Administrative Requirements***
 - 1:00 PM – 3:00 PM (Eastern)
 - Non-GAQC members can register at: http://www.cpa2biz.com/AST/Main/CPA2BIZ_Primary/PRDOVR-PC-WBC14265I/PC-WBC14265I.jsp
 - GAQC members see *GAQC Alert #261* for member registration information
- ▶ **GAQC Members Can Access No-CPE Archived Web Event at: *Uniform Guidance for Federal Awards: The New Cost Principles, Time and Effort Reporting, Procurement and Other Administrative Requirements***

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Background and Overview of New Subrecipient Monitoring Requirements



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OMB Uniform Guidance for Federal Awards

- ▶ ***Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance for Federal Awards)***
 - [Electronic Code of Federal Regulations \(e-CFR\)](#) version
 - PDF version of the [Federal Register Notice](#) in its entirety
 - Issued Late December 2013 by OMB

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COFAR

- ▶ **Council on Financial Assistance Reform (COFAR) working with OMB on rollout and related guidance**
 - Visit www.cfo.gov/COFAR access to the following:
 - Archived Training webcast 1/27/2014 and 10/2/2014
 - [Frequently Asked Questions for New Uniform Guidance at 2 CFR 200](#) (COFAR FAQs) issued 8/29/2014 this document includes previously submitted and answered questions.
 - In case of any discrepancy, the guidance at 2 CFR Part 200 governs.
 - Award specific questions should be addressed to the Federal awarding agency or pass-through entity.

Uniform Guidance for Federal Awards Contents

- ▶ **Subpart A - Acronyms and Definitions**
- ▶ **Subpart B - General Provisions**
- ▶ **Subpart C - Pre-Federal Award Requirements and Contents of Federal Award**
- ▶ **Subpart D - Post Federal Award Requirements**
- ▶ **Subpart E - Cost Principles**
- ▶ **Subpart F Audit Requirements**
- ▶ **Numerous Appendix**

Uniform Guidance for Federal Awards - Effective Dates

- ▶ **Federal agencies must implement policies and procedures by promulgating regulations to be effective December 26, 2014**
- ▶ **Non-federal entities will need to implement the new administrative requirements and Cost Principles for all new federal awards made after December 26, 2014, and to additional funding to existing awards (referred to as funding increments) made after that date**
 - Non-federal entities wishing to implement entity-wide system changes to comply with the guidance after **December 26, 2014**, will not be penalized for doing so
- ▶ **Audit requirements effective for fiscal years beginning on or after December 26, 2014**
 - Not permitted to early implement any of the audit provisions

Effective Date – Are You Sure You Get it??

- ▶ **June 30, 2014, September 30, 2014, and December 31, 2014, year ends:**
 - No impact from the Uniform Grant Guidance for non-federal entities and auditors
- ▶ **March 31, 2015, June 30, 2015, and September 30, 2015 year-ends:**
 - Non-federal entities will have to adopt new administrative requirements and Cost Principles relating to all new federal awards and additional funding to existing awards
 - Single audit requirements continue to use “old” regulation but auditor compliance testing will be affected by client adoption of “new” requirements (i.e., will likely have to test some awards subject to the old requirements and some the new requirements)
- ▶ **December 31, 2015, year-ends and beyond:**
 - New single audit requirements apply

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COFAR FAQ .110-13 and 13 - Effective Date for Funding Increments

- ▶ **Uniform Guidance will apply to funding increments to existing awards in cases where the federal agency considers the funding increments to be an opportunity to modify the terms and conditions of the award.**
- ▶ **Existing federal awards that do not receive incremental funding with new terms and conditions will continue to be governed by the terms and conditions of the Federal award.**


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Changes in Audit Threshold that Can Affect Subrecipient Monitoring

- ▶ **Audit threshold increased to \$750,000**
 - Reduces audit burden for approximately 5,000 non-federal agencies while maintaining coverage of over 99%.
- ▶ **Type A/B threshold is a sliding scale with new minimum**
 - Minimum increases from **\$300,000** to **\$750,000**

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Subrecipients Versus Contractors



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Subrecipient Monitoring and Management – A High-Level Overview

- ▶ **Subrecipient versus contractor determination expanded and relocated to administrative requirements in sec. 200.330**
 - Criteria for determination basically unchanged
- ▶ **New requirements for Pass-Through Entities (PTEs) with regard to monitoring activities**
 - Much more detailed than guidance contained in *Compliance Supplement*
 - Includes a required risk assessment of subrecipients
- ▶ **New subaward requirements**

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Subrecipient Monitoring and Management – Definitions in Subpart A

Pass-through Entity – A non-Federal entity that provides a **subaward** to a **subrecipient** to carry out part of a Federal program. (section 200.74)

Subaward – An award provided by a PTE to a subrecipient for the subrecipient to carry out part of a Federal award received by the PTE. It does not include payments to a **contractor** or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the PTE considers a **contract**. (section 200.92)

Subrecipient – A non-Federal entity that receives a subaward from a PTE to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. (section 200.93)

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Subrecipient Monitoring and Management – Definitions in Subpart A

Contract – A **legal instrument** by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in Part 2 CFR does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward. (section 200.22)

Contractor* – An entity that receives a contract, i.e. a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. (section 200.23)

*Contractor replaces the term "Vendor" from OMB Circular A-133.

Subrecipient / Contractor Determination


- ▶ **A non-federal entity may concurrently receive Federal awards as a:**
 - Recipient
 - Subrecipient
 - Contractor
- ▶ **PTE must make case-by-case determination whether each agreement it makes for the disbursement of federal program funds casts the party receiving the funds in the role of a:**
 - Subrecipient, or
 - Contractor

Subrecipient / Contractor Determination

- ▶ **All characteristics need not be present**
- ▶ **Judgment should be used in the determination process**
- ▶ **Substance of the agreement is more important than the form**

Subrecipient / Contractor Determination	
Subrecipient	Contractor
Creates a Federal assistance relationship	Purpose is to obtain goods and services for the non-Federal entity's own use and creates a procurement relationship
Determines who is eligible to receive what Federal assistance	Provides the goods and services within normal business operations
Has its performance measured in relation to whether objectives of a Federal program were met	Provides similar goods or services to many different purchasers
Has responsibility for programmatic decision making	Normally operates in a competitive environment
Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and	Provides goods or services that are ancillary to the operation of the Federal program; and
In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the PTE	Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons

Roles & Responsibilities of Pass-Through Entities and Subrecipients



Requirements for PTEs – Section 200.331

- ▶ Ensure that every subaward is clearly identified to the subrecipient as a subaward
- ▶ Provide certain subaward information (see slides 26 – 28) at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification
- ▶ Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring, based on provided criteria (see slide 29 for requirement and best practice slides 46-51)

Requirements for PTEs – Section 200.331

- ▶ Consider imposing specific subaward conditions upon a subrecipient, if appropriate
 - Based on risk or prior history of failure to comply
 - Example conditions that may be added in section 200.207
- ▶ Monitor activities of the subrecipient (see slides 30-40)
- ▶ Other potential PTE monitoring tools depending on risk (see slide 31)
- ▶ Consider whether the results of subrecipient audits, on-site reviews, or other monitoring activity indicate conditions that necessitate adjustment to the PTEs own records
- ▶ Consider taking enforcement action against noncompliant subrecipients as described in section 200.338 (see slide 39)

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Subaward Requirements

- ▶ **Federal Award Identification**
 - Subrecipient name and DUNS number
 - Federal award identification number (FAIN) and award date
 - Subaward period of performance – start and end date
 - Amount of federal funds obligated by the action
 - Total amount of federal funds obligated to the subrecipient
 - Total amount of the federal award
 - Federal award project description
 - Name of the federal awarding agency, PTE, and contact information for awarding official
 - CFDA number and name; must identify the dollar amount made available under each CFDA number at time of disbursement
 - Whether the award is R&D
 - Indirect cost rate for the federal award, including if de minimis rate is charged

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Subaward Requirements

- ▶ All requirements imposed by the PTE
- ▶ Any additional requirements that the PTE imposes on the subrecipient in order for the PTE to meet its own responsibility to the federal awarding agency including identification of any required financial or performance reports
- ▶ An approved federally recognized indirect cost rate negotiated between the subrecipient and the federal government or, if no such rate exists, either a rate negotiated between the PTE and the subrecipient or a de minimis indirect cost rate as defined in section 200.414

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Subaward Requirements

- ▶ A requirement that the subrecipient permit the PTE and auditors to have access to the subrecipient's records and financial statements, as necessary for the PTE to meet its requirements
- ▶ Appropriate terms and conditions concerning the closeout of the subaward (see slide 43)

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Evaluate Subrecipient Risk of Noncompliance – Section 200.331(b)

- ▶ Evaluate subrecipient risk of noncompliance for purposes of determining appropriate subrecipient monitoring including consideration of such factors as:
 1. Subrecipient experience with the same or similar subawards;
 2. Results of previous audits, including whether the subrecipient receives a single audit and the extent to which the subaward has been audited as major;
 3. Whether subrecipient has new personnel or substantially changed systems; and
 4. Extent and results of Federal awarding agency monitoring.

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Required Subrecipient Monitoring Activities – Section 200.331(d)

- ▶ Review financial and programmatic reports
- ▶ Follow-up and ensure that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the federal award through audits, on-site reviews, and other means
- ▶ Issue management decisions for audit findings pertaining to the federal award provided to the subrecipient

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Other Potential PTE Monitoring Tools Depending on Risk

- ▶ **Section 200.331(e) identifies the following tools that may be useful for the PTE to ensure proper accountability and compliance with program requirements and achievement of performance goals**
 - Providing training and technical assistance
 - Performing on-site reviews of program operations
 - Arranging for agreed-upon procedures (AUP) engagements that meet certain requirements (see slide 32)
 - Verifying that every subrecipient is audited as required by Subpart F

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AUP Engagements – Section 200.425

- ▶ **PTE may charge federal awards for the cost of agreed-upon procedures engagements to monitor subrecipients who are exempted from the requirements of Subpart F. The cost is only allowable if the AUP engagement is:**
 - Conducted in accordance with the attestation standards in *Government Auditing Standards*
 - Paid for and arranged by the PTE
 - Limited in scope to one or more of the following types of compliance requirements:
 - Activities allowed or unallowed; allowable costs/cost principles; eligibility; and reporting

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Monitoring Best Practices - What, Why, Who, and When?

- ▶ **What is monitoring?**
 - A process that evaluates how a grantee is administering a grant according to the requirements of the grant:
 - Eligibility Determination
 - Allowability of Services
 - Allowable Costs
 - Internal Management Systems
 - Procurement Policy
 - Other
- ▶ **Why is monitoring important?**
 - Ensure compliance with federal rules and regulations
 - Ensure services are provided in accordance with subaward agreement
- ▶ **What is the role of a monitor?**
 - Notification of review
 - Request necessary policies and documents
 - Provide technical assistance as needed
- ▶ **When do you monitor?**
 - As deemed necessary based on annual risk assessment

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Monitoring Best Practices - Monitoring Plan

- ▶ **Clearly identify necessary activities and responsible parties;**
- ▶ **Review debarment lists;**
- ▶ **Allow for consistency throughout monitoring activities;**
- ▶ **Characteristics include:**
 - Data quality reviews;
 - Required progress reporting;
 - Site and desk reviews, potentially critical for large-scale projects;
 - Compliance auditing; and
 - Develop corrective action plans.



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Monitoring Best Practices - Monitoring Plan

- ▶ **Once the process has concluded, develop and implement an internal action plan:**
 - Revise policies and procedures;
 - Enforce compliance with the internal requirements; and
 - Execute ongoing monitoring.
- ▶ **Utilize your internal auditors to conduct regular, detailed reviews; and**
- ▶ **Know where others have faltered.**

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Monitoring Best Practices - How Do You Monitor?

- ▶ **Techniques for conducting monitoring activities**
 - Desk reviews
 - On-site field reviews
 - AUPs
 - Consider need to separate fiscal monitoring from programmatic monitoring.

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Monitoring Best Practices - Monitoring Results

▶ **Upon conclusion of monitoring:**

- Findings will be completed by the reviewer and signed by the director of the or designee of the PTE.
- A copy will be provided to the subrecipient identifying any deficiencies.
- Immediate action should be taken by subrecipient to correct issues involving ineligible uses of federal funds.
- A corrective action plan should be developed by the subrecipient within a specified period (e.g., 60 days) from the issuance of the review findings to address deficiencies or noncompliance issues.

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Monitoring Best Practices - Monitoring Results

▶ **Upon conclusion of monitoring (continued):**

- Review corrective action plans based on the PTEs monitoring work or the results of independent audits;
- Consider applying remedies for noncompliance, if appropriate (see slide 39)
- Report noncompliance or sanctioning activities to the federal government for follow-up when required.

▶ **Document the execution of monitoring activities and corrective action taken.**

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Remedies for Non-Compliance – Section 200.338

▶ **If non-federal entities fail to comply with requirements, the PTE may impose additional conditions as described in section 200.207**

▶ **If noncompliance cannot be remedied with additional conditions, the PTE may take one or more of the following actions, as appropriate:**

- Temporarily withhold cash payments
- Disallow all or part of cost of the activity not in compliance
- Wholly or partly suspend or terminate the federal award
- Recommend that the federal agency initiate suspension and debarment proceedings
- Withhold further federal awards
- Take other remedies that may be legally available

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Monitoring Best Practices - Monitoring Follow-Up

- ▶ **Why is follow-up important?**
- ▶ **Identify recurring problems to a program**
 - Example: Incorrect eligibility determinations could result in unallowable charges to federal program.
- ▶ **Identify recurring problems with a subrecipient**
 - Example: Subrecipient that fails to correct monitoring findings is at risk of incurring additional unallowable costs or audit findings.

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Fixed Amount Subawards – Section 200.332

- ▶ **With prior written approval from the federal awarding agency, a PTE may provide subawards based on fixed amounts up to the Simplified Acquisition Threshold, provided that the subawards meet the requirements for fixed amount awards in section 200.201**
- ▶ **Compliance with additional PTE requirements, e.g., SEFA considerations**

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Schedule of Expenditures of Federal Awards – Section 200.510(b)(4)

- ▶ **Total amount provided to subrecipients from each federal program:**
 - Previous guidance only required “to the extent practical”

Federal Grantor/Pass Through Grantor/Program Title	Federal CFDA Number	Pass Through Entity Identifying Number	Federal Expenditures	Expenditures to Subrecipients
Department of Education Direct Program – Title I Grants to Local Educational Agencies	84.010	N/A	\$1,000,000	\$800,000

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Closeout – Section 200.343

- ▶ **The PTE should complete all closeout actions for federal awards no later than one year after receipt and acceptance of all required final reports.**


Report Submission – Section 200.512(b)

- ▶ **Data Collection. The Federal Audit Clearinghouse is the repository of record for Subpart F—Audit Requirements of this Part, reporting packages and the data collection form. All Federal agencies, PTEs and others interested in a reporting package and data collection form must obtain it by accessing the FAC.**
 - This is a different process than currently used by PTEs and subrecipients today

Subrecipient Responsibilities

- ▶ **Non-federal entities must comply with requirements in Uniform Guidance for Federal Awards regardless of whether the non-federal entity is a recipient or subrecipient of a federal award.**
- ▶ **Uniform Guidance for Federal Awards is explicit on requirements for PTEs, but subrecipient responsibilities are scattered throughout the guidance and are not generally called out separately as a subrecipient requirement (i.e., refers instead to non-federal entity requirements)**

Risk Assessment Considerations



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A Clarification Regarding the Slides in this Section

- ▶ See slide 29 for Uniform Guidance for Federal Awards requirements for evaluating the risk of noncompliance.
- ▶ The slides in this section contain a discussion of best practices when it comes to performing the required risk assessment

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Best Practice - What is a Risk Assessment?

- ▶ Risk assessment measures two quantities:
 - Magnitude of the potential non-compliance
 - Probability that the non-compliance will occur
- ▶ What is the overall risk assessment for the subrecipient?
 - Determines frequency of monitoring
 - Determines depth of monitoring
- ▶ Should be done annually

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Best Practice - Identify and Limit Risk

- ▶ Understand subrecipients' familiarity with the program and applicable regulations;
- ▶ Design contracts in accordance with federal regulations and to account for all data and reporting requirements;
- ▶ Incorporate contract language that allows your organization to amend contracts as additional guidance from the federal government is received;
- ▶ Review the results of previous audits for any findings that may have resulted; and
- ▶ Submit timely, detailed enforcement reports to the federal government to demonstrate that subrecipient monitoring is a priority and is being executed when issues are observed.


Best Practice - Additional Risk Items to Consider, Beyond those in 200.338

- ▶ Provider history
- ▶ Policies and procedures
- ▶ Financial stability
- ▶ Management systems
- ▶ Size of the award
- ▶ Percentage of award vs. total federal awards received by the agency
- ▶ Complexity of award requirements
- ▶ Single or multi-year award

Best Practices – Risk Assessment Documentation

1. Be explicit in criteria used to evaluate risk
2. Customize the risk factors for the program
3. Update frequently (at least annually)
4. Consider multiple levels of risk (beyond high/low)
5. Match risk assessment conclusion to related monitoring activity

Auditor Considerations



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2015 Compliance Supplement

- ▶ **2015 Supplement will be used for audits performed under Circular A-133 and the Uniform Guidance:**
 - Transition auditing to be challenging
- ▶ **Update process includes receiving input from AICPA and others.**
- ▶ **Likely release an early vett draft for Part 3**
 - To include updated/revised section on Subrecipient Monitoring

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2015 Compliance Supplement – Part 3

- ▶ **Plan to have two Part 3 sections in 2015:**
 - Awards under Uniform Guidance requirements
 - Awards prior to Uniform Guidance
- ▶ **Consistency between two Part 3 sections where requirements are the same.**

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Auditor Review of Monitoring Activities
Audit Objectives

Audit Objectives

- ▶ **Internal Control to support a low control risk assessment.**
- ▶ **Compliance**

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Relevant COFAR FAQ Questions



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COFAR FAQs

- ▶ **While few of the recently released COFAR FAQs apply specifically to subrecipient monitoring, there are several questions of relevance to PTEs and subrecipients.**
- ▶ **In particular, several questions related to required subaward information described in section 200.331 (a)(4) as follows:**
 - An approved federally recognized indirect cost rate negotiated between the subrecipient and the federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this Part), or a de minimis indirect cost rate as defined in section 200.414 Indirect (F&A) costs, paragraph (b) of this Part.

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COFAR FAQs

► **Questions of Interest to PTEs and Subrecipients**

- Pass-through Entities, Indirect Cost Rates, and State Funds
- Limits on layers of Subrecipients for Indirect Costs
- Delayed Federal funds and Indirect Cost Rates
- Indirect Cost Rates and Blended Subawards
- Indirect Cost Rates and Entities Who Do Not Have Indirect Costs
- Pass-through Entities and Indirect Cost Rate Negotiation
- Indirect Cost Rates and non-Compliance with Guidance

COFAR FAQs

► **200.331-1 Pass-through Entities, Indirect Cost Rates, and State Funds**

Q: When a pass-through entity uses Federal and non-Federal funds to make a subaward to a nonprofit as a subrecipient, is the requirement in section 200.331(a)(4) for pass-through entities to provide an indirect cost rate applicable for only for the portion of the funds from Federal award that are utilized or the total funds?

A: Federal Uniform Guidance including section 200.331(a)(4) applies to Federal funds as specified in the terms and conditions of the Federal award.

COFAR FAQs

► **200.331-2 Limits on Layers of Subrecipients for Indirect Costs**

Q: Is there a limit on the number of layers of subrecipients at which the requirement to pay indirect costs is no longer applicable? For example, a state may pass-through Federal grant funds to a local government. The local government may then pass all or some of the funds through to a local nonprofit, which then also utilizes the services of other nonprofit providers as subrecipients.

A: No, there is no limit under the Uniform Guidance, but the Federal award may have a limit.

COFAR FAQs

▶ 200.331-4 Indirect Cost Rates and Blended Subawards

Q: States often blend several Federal funding streams to pay for services performed by nonprofit organizations. Each Federal funding stream may have a different set of requirements, particularly as it relates to indirect costs — some with statutory caps on indirect costs and others without a cap and are covered by the new provision in the Uniform Guidance. How should a pass-through entity calculate the indirect cost rate it must reimburse the nonprofit?

A: Each Federal award is subject to its own terms and conditions, and the funding streams would be tracked accordingly. For payments of indirect cost to the subrecipients, the pass-through entity must follow any statutory caps required by the funding streams. If a non-Federal entity wishes to blend funds from multiple Federal awards and apply only one set of terms and conditions to all the funds, the terms and conditions of that arrangement must be agreed to in advance by all participating Federal awarding agencies.

COFAR FAQs

▶ 200.331-6 Pass-through Entities and Indirect Cost Rate Negotiation

Q: This section states that pass-through entities are expected to honor a subrecipient's negotiated F&A rate agreement, or use a 10% MTDC de minimis rate, or negotiate an F&A rate with the subrecipient. Is it acceptable to require a subrecipient to accept a rate lower than 10% MTDC via negotiation, or in lieu of their negotiated F&A rate? If a subrecipient requests to establish a rate via negotiation, does the pass-through entity have to establish the rate via negotiation?

A: If the subrecipient already has a negotiated F&A rate with the Federal government, the negotiated rate must be used. It also is not permissible for pass-through entities to force or entice a proposed subrecipient without a negotiated rate to accept less than the de minimis rate. The cost principles are designed to provide that the Federal awards pay their fair share of the costs recognized under these principals. (See section 200.100(c).) Pass-through entities may, but are not required, to negotiate a rate with a proposed subrecipient who asks to do so.

Preparing for the New Uniform Guidance for Federal Awards



Tips for Entities Implementing the New Uniform Guidance for Federal Awards

- ▶ Ensure an Appropriate Understanding of Effective Dates
- ▶ Obtain an Understanding of the New Requirements. There is no getting around reading the new requirements!
- ▶ Focus on Areas of Most Significance First (e.g., subrecipient monitoring)
- ▶ Developing a Plan to Become Compliant. To include identification of needed policy and procedure changes; internal controls that might need to be established or modified; action items that will be needed to implement needed changes; who within the entity is responsible for each action item; and timing
- ▶ Senior Management Should Be Involved. The tone at the top is important as it relates to major changes like this
- ▶ Access Available Resources. See slides at end of presentation
- ▶ Training is Important. (Both new requirements and new entity-specific policies and procedures)

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What Should Auditors be Doing this Year?

- ▶ Client education!
- ▶ Firm and State Audit Organization (SAO) leaders should learn the details of the Uniform Guidance for Federal Awards in its entirety.
- ▶ Provide staff with high-level training to ensure knowledgeable in the event auditees have questions during the 2014 audit process
- ▶ Establish firm/SAO policies for areas that will be affected now (e.g., ensuring that responses to requests for proposal and audit contracts contemplate new requirements)

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Uniform Guidance For Federal Awards Resources

- ▶ OMB/COFAR resources that clients and auditors should access:
 - Access all the various Uniform Grant Guidance documents at: http://www.whitehouse.gov/omb/grants_docs
 - Go to the [COFAR Mailing List link](#) to register and receive future announcements, information on upcoming webcasts, and other COFAR resources
 - Access an [archive of an OMB Web event and related presentation materials](#) covering the contents of the various Subparts and requirements
 - Access a COFAR FAQ document titled, [Frequently Asked Questions for New Uniform Guidance at 2 CFR 200](#) issued 8/29/2014 this document includes previously submitted and answered questions.

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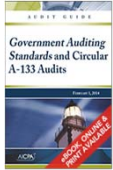
Future Uniform Guidance Activities

- ▶ **Federal Register notice expected by end of year to announce each federal agency adoption of Uniform Guidance:**
- ▶ **OMB to release technical corrections to Uniform Guidance by end of year:**
 - Some may be more substantive than others (e.g., changing must to should or visa versa)
- ▶ **More from COFAR?**
 - FAQs? Web events? Other?
- ▶ **AICPA to issue updated Audit Guide, *Government Auditing Standards and Circular A-133 Audits*, in 2015**
 - Will include an updated chapter on PTE/Subrecipient issues

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GAS-A133 Audit Guide

- ▶ **Government Auditing Standards and Circular A-133 Audits - Audit Guide**
 - Significant changes expected for 2015 edition of GAS-A133 Guide
 - ✓ Need to maintain old and new single audit guidance through transition period
 - ✓ All single audit chapters addressing Circular A-133 audits to be updated and maintained.
 - ✓ New chapters to be added addressing the Uniform Guidance
 - ✓ Transition guidance likely to be added to each chapter as well
 - ✓ Will re-look at auditors reports to determine if any changes in Uniform Guidance for Federal Awards will result in reporting changes




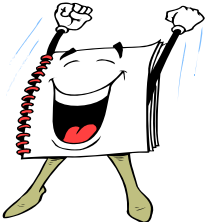
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Uniform Guidance For Federal Awards Resources

- ▶ **GAQC Resources:**
 - [GAQC Alert #241](#) - OMB's New Uniform Grant Guidance Subparts A-D and Other Key Related Information
 - [GAQC Alert #243](#) - Information about the New COFAR FAQs on the Uniform Grant Guidance
 - [GAQC Alert #250](#) - OMB's New Uniform Grant Guidance Subpart E and Other Key Related Information
 - Future *GAQC Alerts* on specific guidance in the Uniform Grant Guidance

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Questions ?????



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Thank You for Attending!



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