

ENTITY 2023 Audit Programs

June 30, 2023

SINGLE AUDIT

PROCEDURE	OBJ.	DONE BY	W/P REF	N/A	REMARKS
<p>Audit Objectives:</p> <p>A. Federal revenues and expenditures are valid and complete and, if applicable, indirect costs are allocated properly.</p> <p>B. Federal revenues and expenditures are properly presented in the financial statements.</p> <p>C. The Entity has complied with laws and regulations affecting the expenditure of grant funds.</p> <p>Note: Programmatic requirements are unique to each federal program and can be found in the laws, regulations, and provisions of contract and grant agreements pertaining to the program. For programs listed in the Compliance Supplement, the programmatic requirements can be found in Part 4. For those not covered in the Compliance Supplement, review Part 7 of the supplement.</p> <p>Please note that the Compliance Supplement has a large amount of explanations and descriptions included in the Compliance Requirement and Audit Objective sections, such as factors to consider when evaluating risk. If you do not understand an audit procedure, please review the Compliance Supplement.</p> <p>Note: The following audit program steps were developed utilizing Part 3.2 of the 2023 Compliance Supplement.</p> <p>Audit Procedures:</p> <p>A. Review applicable reference material:</p> <ol style="list-style-type: none"> 1. The Uniform Guidance. 2. CFR Part 200, Appendix X1 Compliance Supplement. 3. Compliance Audits (AU-C 935). 4. GAO Government Auditing Standards (the Yellow Book), 2018 revision. 5. AICPA Audit Guide, Audits of State and Local Governmental Units. 6. OMB Federal Assistance Listings. 7. Applicable sections of the Code of Federal Regulations. 					

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<p>8. U.S. Department of the Treasury, Coronavirus State and Local Fiscal Recovery Funds: Overview of the Final Rule. (https://home.treasury.gov/system/files/136/SLFRP-Final-Rule-Overview.pdf)</p> <p>B. Obtain or prepare a Schedule of Expenditures of Federal Awards. If prepared by auditor, determine Independence will not be impaired. The schedule should include:</p> <ol style="list-style-type: none"> 1. Federal grantor or pass-through agency, if applicable. 2. Program name. 3. Assistance listing number. 4. Grant number. 5. Program or award amount. 6. Program disbursements/expenditures (for cash awards) or the value of non-cash assistance (for non-cash awards). 7. All programs completed and/or terminated during the year and all programs open without monies being received or expended during the audit period. 8. Any program with Coronavirus Relief Funds (COVID-19) must be listed separately and include the prefix "COVID-19," in the federal grant program name and distinguish from non-COVID-19 subawards. <p>C. Determine each program's name and Assistance Listing number reported in the Schedule of Expenditures of Federal Awards agrees with the Agency Program Index.</p> <p>D. Reconcile appropriate amounts on the Schedule of Expenditures of Federal Awards to amounts in the financial statements and to amounts in the accounting records and document accordingly.</p> <p>E. For each major program, obtain the following information:</p> <ol style="list-style-type: none"> 1. Include the relevant Compliance Supplement pages for each major program. 2. Grant agreement, application or pass-through agreement and any amendments. 3. Pertinent correspondence, including budget and program modifications. 4. Financial reports. 	A				
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5. Reference material for clarification of grant/program audit objectives and compliance requirements.					
6. Identification of subrecipients, if applicable.					
7. Basis of accounting.					
8. Contact person.					
9. Account codes used to account for program activities.					
10. Names and addresses of grantors (direct and indirect).					
F. Include copies of pertinent information relating to major programs in the permanent file.					
G. Search for unlisted federal programs not previously identified.	A				
H. Review prior year audit reports to determine the nature of previous findings and questioned costs. Document the status, which will be included in the Entity's report in a Summary Schedule of Prior Audit Findings.	C				
I. If applicable, send a letter of understanding to the cognizant agency.					
J. Compliance testing for major programs:	C				
1. Test compliance with applicable compliance requirements. (See following separate audit program sections.)					
2. Review Compliance Supplement for any special tests and provisions and perform appropriate procedures to ensure compliance.					
3. Report the following items in Part III of the Schedule of Findings and Questioned Costs in accordance with the Uniform Guidance (2 CFR 200.516):					
a. Significant deficiencies and material weaknesses in internal control over major programs and significant instances of abuse relating to major programs.					
b. Material non-compliance with the provisions of laws, regulations, contracts or grant agreements related to a major program.					

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<p>c. Known or likely questioned costs which are greater than \$25,000 for a type of compliance requirement for a major program. (Should include information to provide proper perspective for judging the prevalence and consequences of the questioned costs)</p> <p>d. Known questioned costs, which are greater than \$25,000 for a type of compliance requirement for a federal program, which is not audited as a major program. (Note: except for audit follow-up, the auditor is not required to perform audit procedures for such federal programs)</p> <p>e. The circumstances concerning why the auditor's report on compliance for major programs is other than an unmodified opinion, unless such circumstances are otherwise reported as findings.</p> <p>f. Known or likely fraud affecting a federal award, unless such fraud is otherwise reported as a finding.</p> <p>g. Instances where the results of audit follow-up procedures disclosed that the summary schedule of prior audit findings prepared by the auditee materially misrepresents the status of any prior audit finding.</p> <p>4. Report other findings in Part IV of the Schedule of Findings and Questioned Costs.</p> <p>Compliance Requirements:</p> <p>The following applicable compliance requirements should be tested in conjunction with the other tests of detail or through other appropriate tests:</p> <p>A. ACTIVITIES ALLOWED OR UNALLOWED:</p> <p>1. Identify the types of activities allowed and unallowed for the program(s) tested.</p> <p>2. If allowability is determined based upon summary level data, verify allowability of the activity and that individual transactions were properly classified and accumulated into the activity total.</p>					

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<p>3. If allowability is determined based upon individual transactions, select a sample of transactions and verify allowability of the activity. Be alert for any large dollar transfers from program accounts, which may have been used to fund unallowable activities.</p> <p>B. ALLOWABLE COSTS/COST PRINCIPLES:</p> <p>1. For transactions selected which involve federal funds determine whether the costs meet the following criteria:</p> <p>a. Costs were necessary and reasonable for the performance of the Federal award and allocable to the federal award under the principles in 2 CFR part 200, subpart E.</p> <p>b. Conform to any limitations or exclusions set forth in 2 CFR part 200, subpart E, or in the Federal award as to types or amount of cost items.</p> <p>c. Consistent with policies and procedures that apply uniformly to both federal and non-federal activities of the Entity.</p> <p>d. Not allocable to or included as a direct cost of a federal program if the same or similar costs are allocated to the Federal award as an indirect cost.</p> <p>e. Not included as a cost or used to meet cost sharing or matching requirements of another federally supported activity in either the current or a prior period.</p> <p>f. Supported by underlying documentation.</p> <p>g. Determined in conformity with general accepted accounting principles, except, as otherwise provided for in 2 CFR part 200.</p> <p>2. If unallowable direct costs have been identified, determine whether "directly associated costs" have also been charged.</p> <p>3. Determine costs were approved by the federal awarding agency if required, or in accordance with 2 CFR section 200.407 for selected items of costs.</p>					

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<p>4. Determine costs did not consist of improper payments including:</p> <ul style="list-style-type: none"> a. Payments which should not have been made or were for incorrect amounts (including overpayments and underpayments) under statutory, contractual, administrative or other legally applicable requirements. b. Payments which do not account for credit for applicable discounts. c. Duplicate payments. d. Payments to an ineligible party or for an ineligible good or service. e. Payments for goods and services not received (except where authorized by law). <p>5. If the Entity is using a de minimis indirect cost rate:</p> <ul style="list-style-type: none"> a. Determine the Entity has not previously claimed indirect costs on the basis of a negotiated rate. Auditors are required to test only for the three fiscal years immediately prior to the current audit period. b. Test selected transactions for conformance with 2 CFR section 200.414 (f). <ul style="list-style-type: none"> 1) Verify the de minimis rate was used consistently, the rate was applied to the proper base and amounts claimed were the product of applying the rate to a modified total direct costs base. 2) Verify the costs included in the base are consistent with the costs included in the base year, i.e. verify current year modified total direct costs do not include costs items that were treated as indirect costs in the base year. c. Determine if the Entity's use of the de minimis rate resulted in the Entity double-charging or inconsistently charging costs as both direct and indirect. 					

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<p>6. Cost Allocation Plans/Indirect Cost Rate Agreements</p> <p>Determine whether material indirect costs or centralized or administrative services are being charged to federal programs. If such costs are being charged, perform the following procedures:</p> <ol style="list-style-type: none"> Obtain and read the Indirect Cost Rate Agreement (ICRA) and/or the current Cost Allocation Plan (CAP) and determine the types of rates and procedures required. Determine the terms of the allocation plan and/or rate agreement in effect (i.e., predetermined, fixed with carryforward provisions or provisional/final). Verify the methods of charging costs to federal awards are in accordance with the provisions of the approved Indirect Cost Rate Proposal (ICRP) or CAP, or prepared ICRP or CAP, on file. Determine whether the CAP or ICRP includes the required documentation in accordance with 2 CFR part 200, Appendix VII, paragraph D or Appendix V, paragraph E, as applicable. If the Entity does not have a negotiated ICRA, determine whether documentation exists to support costs. Report Question Costs if no support. If ICRP is not complete, consider whether interim testing is necessary of the costs charged to the cost pools and the allocation bases to minimize questioned costs, if any. Examine claims submitted to the federal agency for reimbursement. Determine if the amounts charged and rates used are in accordance with the plan and if rates are being applied to the appropriate base. Review, on a test basis, supporting documentation to determine whether: <ol style="list-style-type: none"> The indirect cost pool or centralized service costs contain only allowable costs in accordance with 2 CFR part 200. The methods of allocating the costs are in accordance with the provisions of 2 CFR part 200, other applicable regulations and negotiated agreements. 					

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<p>3) Employee time report system results are mathematically and statistically accurate, allowable and properly allocated to the various functional and programmatic activities to which the salary and wage costs are charged.</p> <p>4) If ICRP uses the multiple allocation base method, test statistical data to determine if the proposed allocation or rate bases are reasonable, updated as necessary and do not contain any material omissions.</p> <p>5) The indirect costs charged to federal programs are supported by amounts recorded in the accounting records from which the most recently issued financial statements were prepared.</p> <p>7. When material charges are made from internal service, central service, pension or similar activities or funds, verify the charges from these activities or funds are in accordance with the 2 CFR part 200:</p> <p>a. For activities accounted for in separate funds, ascertain if:</p> <p>1) Net position/fund balances (including reserves) were computed in accordance with cost principles.</p> <p>2) Working capital was not excessive in amount (generally not greater than 60 days for cash expenses for normal operations incurred for the period exclusive of depreciation, capital costs and debt principal costs).</p> <p>3) Adjustments were made when there is a difference between the revenue generated by each billed service and the actual allowable costs.</p> <p>4) Refunds were made to the federal government for its share of any amounts transferred or borrowed from internal service or central service funds for purposes other than to meet the operating liabilities, including interest on debt, of the fund.</p> <p>b. Verify all users of services were billed in a consistent manner.</p> <p>c. Verify the billing rates exclude unallowable costs.</p>					

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<p>d. Where billing rates are not accounted for in separate funds, verify the billing rates are developed based on actual costs and were adjusted to eliminate profit.</p> <p>e. For organizations which have self-insurance and certain type of fringe benefit program (e.g., pension funds), verify independent actuarial studies appropriate for such activities are performed at least biennially and current costs were allocated based on an appropriate study which is not over two years old.</p> <p>C. CASH MANAGEMENT:</p> <p>1. Review Entity trial balances for unearned federal revenue. Consider if such balances are consistent with the requirement to minimize the time between drawing and disbursing federal funds.</p> <p>2. If an advancement method is used, select cash drawdowns and verify the Entity minimized the time elapsing between the transfer of funds from the U.S. Treasury or pass-through entity and disbursement by the Entity.</p> <p>3. If a reimbursement method is used, select expenditures included in the cash drawdowns made during the period from the U.S. Treasury or pass-through entity. Trace to supporting documentation and determine if the expenditures were incurred prior to the date of the reimbursement request. (2 CFR section 200.305(b)(3)).</p> <p>4. Determine program income (including payments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, or interest) was disbursed before requesting additional federal cash draws. (2 CFR section 200.305(b)(5)).</p> <p>5. Review records to determine if interest in excess of \$500 per year was earned on advances and whether it was returned to the Department of Health and Human Services Payment Management System. (2 CFR section 200.305(9)).</p>					

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<p>6. For cost-reimbursement contracts under the Federal Acquisition Regulation: Perform tests to ascertain if the Entity requesting reimbursement a) disbursed the funds prior to the date of the request or b) meets the conditions allowing for the request for costs incurred, but not necessarily paid for (i.e., ordinarily within 30 days of the request (48 CFR section 52.216-7(b))).</p> <p>7. For loans, loan guarantees, interest subsidies and insurance, perform tests to ascertain if the Entity complied with applicable program requirements.</p> <p>8. For pass-through entities: Review selected subrecipient payments and determine if the Entity implemented procedures to ensure that the time elapsing between transfer of federal funds to the subrecipient and disbursement for program purposes by the subrecipient was minimized (2 CFR section 200.305(b)(1)).</p> <p>D. RESERVED</p> <p>E. ELIGIBILITY:</p> <p>1. Individuals:</p> <p>a. For some federal programs with a large number of individuals receiving benefits, the Entity may use a computer system for the processing of individual eligibility determinations and the delivery of benefits. U.S. generally accepted auditing standards provide guidance for the auditor when computer processing relates to accounting information that can materially affect the financial statements being audited. When eligibility is material to a major program, and a computer system is integral to eligibility compliance, the auditor should follow this guidance and consider the Entity's computer processing.</p> <p>1) Perform audit procedures relevant to the computer system as needed to support the opinion on compliance for the major program.</p> <p>2) These tests may be performed as part of testing the internal controls for eligibility.</p>					

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<ul style="list-style-type: none"> b. For split eligibility functions, determine that testing for internal controls and compliance objectives are performed regardless of whether the State performs part of the determination. c. Perform procedures to determine completeness of the population. d. Select a sample of individuals receiving benefits and perform tests to determine if the: <ul style="list-style-type: none"> 1) Individuals were eligible in accordance with the compliance requirements of the program. (Note: Some programs have initial and continuing eligibility requirements. Some programs require periodic redeterminations of eligibility.) 2) Benefits paid to or on the behalf of the individuals were calculated correctly and in compliance with the requirements of the program. 3) Benefits were discontinued when the period of eligibility expired, or if the person became ineligible. e. Review the quality control process and perform tests to ascertain if it is operating to effectively meet the objectives of the process and in compliance with applicable program requirements. <p>2. Group of Individuals or Area of Service Delivery:</p> <ul style="list-style-type: none"> a. Test information used in determining eligibility and determine if the population or area of service delivery was eligible. b. Perform test to determine if: <ul style="list-style-type: none"> 1) The population or area served were eligible. 2) The benefits paid to or on behalf of the individuals or area of service delivery were calculated correctly <p>3. Subrecipients:</p> <ul style="list-style-type: none"> a. If the determination of eligibility is based on an approved application or plan, obtain a copy of the document and identify the applicable eligibility requirements. 					

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<p>b. Select a sample of the awards to the subrecipients and perform procedures to verify that the subrecipients were eligible and amounts awarded were within funding limits.</p> <p>F. EQUIPMENT AND REAL PROPERTY MANAGEMENT:</p> <p>1. Inventory Management:</p> <p>a. Identify equipment acquired during the audit period and trace selected purchases to the property records. Verify the property records contain the following required information about the equipment (under 2 CFR section 200.313(d)(1):</p> <ol style="list-style-type: none"> 1) Description (including serial numbers or other identification numbers). 2) Source of funding for the property (including the federal award identification number). 3) Title holder. 4) Acquisition date and cost. 5) Percentage of federal participation in the cost. 6) Location, use and condition of the property. 7) Ultimate disposition data, including the date of disposal and sale price of the property. <p>b. Verify that the required physical inventory of equipment was performed. (A physical inventory of property must be taken and results reconciled with the property records at least once every two years per 2 CFR section 200.313(d)(2). Test whether any differences between the physical inventory and equipment records were resolved.</p> <p>c. Select a sample of equipment acquired under federal awards from the property records and observe the equipment to ensure equipment is appropriately safeguarded and maintained. (2 CFR section 200.313(d)(2), (4))</p> <p>2. Disposition of Equipment</p> <p>a. Determine equipment dispositions for the audit period and verify the dispositions were properly reflected in the property records.</p>					

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<p>b. For dispositions of equipment acquired under grants and cooperative agreements with a current per-unit fair market value in excess of \$5,000, determine whether the awarding agency was reimbursed for the appropriate federal portion.</p> <p>c. For dispositions of equipment acquired under cost-reimbursement contracts, verify the Entity followed the federal awarding agency disposition instructions.</p> <p>3. Disposition of Real Property:</p> <p>a. Identify real property dispositions for the audit period and determine whether such property was acquired or improved under federal awards.</p> <p>b. Perform procedures to verify the Entity followed the instructions of the awarding agency or pass-through entity, which will normally require reimbursement to the awarding agency of the federal portion of net sales or fair market value at the time of disposition, as applicable.</p> <p>G. MATCHING, LEVEL OF EFFORT, EARMARKING:</p> <ul style="list-style-type: none"> • <u>Matching</u> – includes requirements to provide contributions (usually non-federal) of a specified amount or percentage to match federal awards. Match may be in the form of cash or in-kind contributions. • <u>Level of Effort</u> – includes requirements for (a) a specified level of service to be provided from period to period, (b) a specified level of expenditures from non-federal or federal sources for specified activities to be maintained from period to period and (c) federal funds to supplement and not supplant non-federal funding of services. • <u>Earmarking</u> – includes requirements that specify the minimum and/or maximum amount or percentage of the program's funding that must/may be used for specified activities, including funds provided to subrecipients. <p>Matching:</p> <p>1. Perform test to verify the required matching contributions were met.</p>					

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<p>2. Determine the sources of matching contributions and perform tests to verify they were from an allowable source.</p> <p>3. Test records to corroborate the value placed on in-kind contributions are in accordance with 2 CFR sections 200.306, 200.434 and 200.414, and the terms and conditions of the award.</p> <p>4. Test transactions used to match for compliance with allowable costs/cost principles requirements. This test may be performed in conjunction with the testing of the requirements related to allowable cost/cost principles.</p> <p>Level of Effort:</p> <p>1. Identify the required level of effort and perform tests to verify the level of effort requirement was met.</p> <p>2. Perform tests to verify only allowable categories of expenditures or other effort indicators (e.g., hours, number of people served) were included in the computation and the categories were consistent from year to year.</p> <p>3. Perform procedures to verify the amounts used in the computation were derived from the books and records from which the audited financial statements were prepared.</p> <p>4. Perform procedures to verify the non-monetary effort indicators were supported by official records.</p> <p>Level of Effort - Supplement not Supplant:</p> <p>1. Determine if the Entity used federal funds to provide services which it was required to make available under federal, state or local law and were also made available by funds subject to the supplement not supplant requirement.</p> <p>2. Determine if the Entity used federal funds to provide services which were provided with non-federal funds in prior years.</p> <p>a. Identify the federally funded services.</p> <p>b. Perform procedures to determine whether the federal program funded services that were previously provided with non-federal funds.</p>					

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<p>c. Perform procedures to determine if the total level of services applicable to the requirement increased in proportion to the level of federal contribution.</p> <p>Earmarking:</p> <ol style="list-style-type: none"> 1. Identify the applicable percentage or dollar requirements for earmarking. 2. Perform procedures to verify the amounts recorded in the financial records meet the specified requirements (e.g., minimum amounts determine the records show at least the minimum was charged). 3. When requirements specify a minimum percentage or amount, select a sample of transactions supporting the specified amount or percentage and perform tests to verify proper classification to meet the minimum percentage or amount. 4. When requirements specify a maximum percentage or amount, review the financial records to identify transactions for the specified activity were not improperly classified in another account. (e.g., If administrative costs are limited to 10%, review other accounts charged to the activity for administrative expense which, if incorrectly coded, would cause the maximum percentage to be exceeded). 5. When requirements prescribe the minimum number or percentage of specified types of participants that can be served, select a sample of participants that are counted toward meeting the minimum requirement and perform test to verify that they were properly classified. 6. When requirements prescribe the maximum number or percentage of specified types of participants that can be served, select a sample of other participants and perform test to verify that they were not of the specified type. <p>H. PERIOD OF PERFORMANCE:</p> <ol style="list-style-type: none"> 1. Review the award documents and regulations pertaining to the program and determine any award specific requirements related to the period of performance. 					

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<p>2. Test selected transactions for the following:</p> <p>a. For costs recorded during the beginning of the period of performance, verify costs were not incurred prior to the start of the period of performance unless authorized by the Federal awarding agency or the pass-through entity.</p> <p>b. For costs recorded during the latter part and after the period of performance, verify the costs had been incurred within the period of performance.</p> <p>c. For costs for which the obligation had not been liquidated (payment made) as of the end of the period of performance, verify the liquidation occurred within the allowed time period.</p> <p>3. Select a sample of adjustments to the federal funds and verify these adjustments were for transactions that occurred during the period of performance.</p> <p>I. PROCUREMENT AND SUSPENSION AND DEBARMENT:</p> <p>1. Obtain the Entity's procurement policies and verify the policies comply with applicable federal requirements.</p> <p>2. Determine the Entity has written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection, award and administration of contracts. (2 CFR section 200.318(c) and 48 CFR sections 52.203-13 and 52.203-16)</p> <p>3. Determine if the Entity has a policy to use statutorily or administratively imposed in-state or local geographical preferences in the evaluation of bids or proposals. If such policy exists, verify these limitations were not applied to federal procurements except where applicable federal statutes expressly mandate or encourage geographical preference. (2 CFR section 200.319(c))</p> <p>4. Select a sample of procurements and perform the following:</p> <p>a. Examine contract files and verify they document the history of the procurement, including the rationale for the method of procurement, selection of contract type, basis for contractor selection and the basis of contract price. (2 CFR section 200.318(i) and 48 CFR Part 44 and section 52.244-2)</p>					

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<p>b. For grants and cooperative agreements, verify the procurement method used was appropriate based on the dollar amount and conditions specified in 2 CFR section 200.320. Current micro-purchase and simplified acquisition thresholds can be found in the FAR (48 CFR Subpart 2.1, "Definitions")</p> <p>c. Verify procedures provide for full and open competition. (2 CFR section 200.319 and 48 CFR section 52.244-5)</p> <p>d. Examine documentation in support of the rationale to limit competition in those cases where competition was limited and determine if the limitation was justified. (2 CFR sections 200.319 and 200.320(f) and 48 CFR section 52.244-5)</p> <p>e. Determine a cost or price analysis was performed in connection with procurement actions exceeding the simplified acquisition threshold, including contract modifications and that this analysis supported the procurement action taken. (2 CFR section 200.323 and 48 CFR section 15.404-3)</p> <p>Note: A cost or price analysis is required for each procurement action, including each contract modification, when the total amount of the contract and related modifications is greater than the simplified acquisition threshold.</p> <p>f. Verify the procurement method used was appropriate based on the dollar amount and conditions specified in 2 CFR section 200.320. The five methods of procurement are as follows:</p> <ol style="list-style-type: none"> 1) Micro-purchases: Less than \$10,000 effective December 23, 2016 (\$2,000 for purchases subject to the Davis-Bacon Act) – No competitive quotes required. Spread purchases out among qualified suppliers. 2) Small purchases: Between \$10,000 and \$250,000 – Rate quotes must be obtained from an "adequate" number of qualified sources. ("adequate" is not specifically defined by The Uniformed Guidance.) Quotes can be obtained from suppliers or from public websites. 					

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<p>3) Sealed bids: More than \$250,000 (construction projects) – Two or more qualified bidders. Publicly advertised and solicited from adequate suppliers. Lowest responsive and responsible bidder for the fixed price contract wins.</p> <p>4) Competitive proposals: More than \$250,000 – Written policy for conducting technical evaluations of reviewing proposals and selecting the recipient. Most advantageous bid wins, price and other factors considered.</p> <p>5) Sole source: Any amount. Must meet one of the following four requirements:</p> <p>a) Good/service is only available from a single source.</p> <p>b) Only one source can provide the good/service in the timeframe required.</p> <p>c) Written pre-approval from the Federal awarding agency.</p> <p>d) Competition is deemed inadequate after solicitation attempts through one of the other methods.</p> <p>g. Verify consent to subcontract was obtained when required by the terms and conditions of a cost reimbursement contract specified in 48 CFR section 52.244-2.</p> <p>Note: If the entity has an approved purchasing system, consent to subcontract may not be required unless specifically identified by contract terms or conditions. The auditor should verify the approval of the purchasing system for the audit period being reviewed.</p> <p>5. Test a sample of procurements and subawards to determine if the Entity performed a verification check for covered transactions by checking the System for Award Management (SAM) website (www.sam.gov), collecting a certification from the entity or adding a clause or condition to the covered transaction with the entity (2 CFR section 180.300).</p>					

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<p>6. Test a sample of procurement and subawards against SAM and determine if contracts or subawards were awarded to suspended or debarred parties.</p> <p>7. Test a sample of procurement agreements for infrastructure projects subject to "Build America, Buy America Act (BABAA). Determine whether the entity included the Buy America domestic preference provisions in each agreement or obtained a BABAA waiver.</p> <p>J. PROGRAM INCOME:</p> <p>1. Identify any program income.</p> <p style="padding-left: 40px;">a. Review laws, regulations and terms and conditions of the federal award applicable to the program and determine if program income was anticipated. If so, determine the requirements for recording and using program income.</p> <p style="padding-left: 40px;">b. Inquire of management and review accounting records to determine if program income was received.</p> <p>2. Perform tests to verify that program income was properly determined or calculated in accordance with stated criteria and classified as program income only if collected from allowable sources.</p> <p>3. Perform tests to verify all program income was properly recorded in the accounting records.</p> <p>4. Perform tests to determine if program income was used in accordance with 2 CFR section 200.307(e) and the program requirements set by the federal awarding agency in its regulations and the terms and conditions of the award.</p> <p>K. RESERVED</p> <p>L. REPORTING:</p> <p>1. Review applicable statutes, regulations and the terms and conditions of the federal award pertaining to reporting requirements.</p> <p>2. Determine the types and frequency of required reports.</p> <p>3. Obtain and review federal awarding agency, or pass-through entity in the case of a subrecipient, instructions for completing the reports.</p>					

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<ul style="list-style-type: none"> a. For financial reports, determine the accounting basis used in reporting the data (i.e., cash or accrual). b. For performance and special reports, determine the criteria and methodology used in compiling and reporting the data. <p>4. Perform appropriate analytical procedures and determine the reason for any unexpected differences. Examples of analytical procedures include:</p> <ul style="list-style-type: none"> a. Comparing current period reports to prior periods. b. Comparing anticipated results to the data included in the reports. c. Comparing information obtained during the audit of the financial statements to the report. <p>5. Select a sample of each of the following report types and test for accuracy and completeness.</p> <ul style="list-style-type: none"> a. Financial reports: <ul style="list-style-type: none"> 1) Determine if the financial reports were prepared in accordance with the required accounting basis. 2) Review accounting records and determine if all applicable accounts were included in the sampled reports. 3) Trace the amounts reported to accounting records that support the audited financial statements and the Schedule of Expenditures of Federal Awards and verify agreement. 4) For any discrepancies noted in SF-425 reports concerning cash status when the advance payment method is used, review subsequent SF-425 reports to determine if the discrepancies were appropriately resolved with the applicable payment system. b. Performance reports and special reports: <ul style="list-style-type: none"> 1) Review supporting records and determine if all applicable data elements were included in the sampled report. 					

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<p>2) Trace reported data to records that accumulate and summarize data.</p> <p>3) Perform tests of the underlying data to verify the data were accumulated and summarized in accordance with the required or stated criteria and methodology, including the accuracy and completeness of the reports.</p> <p>c. Special reports for FFATA</p> <p>1) Document understanding of the recipient's methodology used to identify which, if any, awards were subject to the Transparency Act based on inclusion of the award term, assignment by the federal awarding agency of a new FAIN, the effective date of the reporting requirement and whether the Entity passed funds through to first tier subrecipients.</p> <p>2) Select a sample of first tier subawards. Obtain related subaward agreements/ amendments/modifications and determine if the subaward/subcontract was subject to reporting under the Transparency Act based on (a) the date of the award and (b) the amount of the obligating action for subawards or face value of the first-tier subcontracts.</p> <p>If the subaward/subcontract was subject to reporting under the Transparency Act:</p> <p>a. Using the FAIN, find the award in FSRS.</p> <p>FSRS is the portal where the recipient enters the award information; it is only accessible by the subrecipient. Therefore, in order for recipients to demonstrate that information has been properly input, they should coordinate with the auditor regarding the auditor's review of the information, physically or virtually (eg, by logging into its FSRS account either in the auditor's presence or remotely using technology such as screensharing, screenshot evidence, etc.) so that the auditor is able to find the awards in the system as required in this procedure.)</p>					

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<p>b. Compare the award information accessed in Step 2a to the subaward/subcontract documents maintained by the recipient to assess if:</p> <p>(i) Applicable subaward obligations/modifications have been reported.</p> <p>(ii) key data elements (see below) were accurately reported and are supported by the source documentation.</p> <p>(a) Subawardee name.</p> <p>(b) Subawardee DUNS #.</p> <p>(c) Amount of subaward.</p> <p>(d) Subaward obligation/action date.</p> <p>(e) Date of report submission.</p> <p>(f) Subaward number.</p> <p>(g) Subaward project description.</p> <p>(h) Subawardee names and compensation of highly compensated officers.</p> <p>(ii) The action was reported in FSRS no later than the last day of the month following the month in which the subaward/subaward amendment obligation was made or the subcontract award/subcontract modification was made.</p> <p>c. The auditor must provide the following information for non-compliance findings as the results of step 2b.</p> <p>(i) The Entity did not report the subaward information.</p> <p>(ii) The Entity did not report the subaward information timely.</p> <p>(iii) The Entity reported incorrect amount.</p> <p>(iv) The Entity did not report all the key data elements.</p>					

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<p>d. For each type of report:</p> <ol style="list-style-type: none"> 1) When intervening computations or calculations are required between the records and the reports, trace reported data elements to supporting worksheets or other documentation that link reports to data. 2) Test mathematical accuracy of reports and supporting worksheets. <p>6. Obtain written representation from management the reports provided to the auditor are true copies of the reports submitted or electronically transmitted to the federal awarding agency, the applicable payment system or pass-through entity in the case of a subrecipient.</p> <p>M. SUBRECIPIENT MONITORING:</p> <p>Note: The auditor may consider coordinating the tests related to subrecipients performed as part of C “Cash Management” (tests of cash reporting submitted by subrecipients); E “Eligibility” (tests that subawards were made only to eligible subrecipients), I “Procurement and Suspension and Debarment” (tests of ensuring that a subrecipient is not suspended or debarred); and L “Reporting” (tests of performance data reported to funding sources) with the testing of “Subrecipient Monitoring”.</p> <ol style="list-style-type: none"> 1. Review the Entity’s subrecipient monitoring policies and procedures to gain an understanding of the process used to identify subawards (2 CFR section 200.331(a)(1-3), evaluate risk of noncompliance (2 CFR section 200.332(b)) and perform monitoring procedures (2 CFR sections 200.332(d) through (f) and 2 CFR section 200.521 based upon identified risks. <p>If subrecipients are for-profit entities, determine the procedures the entity required to ensure compliance. The agreement must describe applicable compliance requirements and the for-profit subrecipient compliance responsibility. Methods to ensure compliance may include pre-award audits, monitoring during the agreement and post-award audits (2 CFR Section 200.501(h)).</p>					

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<p>2. Test subaward documents, including the terms and conditions of the subaward to ascertain if, at the time of subaward (or subsequent modification), the Entity is sufficiently notifying subrecipients of the award information required by 2 CFR 200.331(a) in order for the Entity to comply with federal statutes, regulations and terms and conditions of the award.</p> <p>Ensure the subaward is clearly identified to the subrecipient as a subaward and the following information is provided at the time when the subaward is made (2 CFR 200.332):</p> <ul style="list-style-type: none"> • Subrecipient's name (which must match the Entity's registered name in the Data Universal Numbering System, DUNS expired April 4, 2022 into Unique Entity Identifier (UEI)). • Subrecipient's UEI. • Federal Award Identification Number (FAIN). • Federal award date (see the definition of Federal award date in §200.1) of award to the recipient by the Federal agency. • Subaward period of performance, including a start and end date. • Subaward budget period start and end date. • Amount of federal funds obligated by this action by the pass-through entity to the subrecipient. • Total amount of federal funds obligated to the subrecipient. • Total amount of the federal award committed to the subrecipient by the pass-through entity. • Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA). • Name of federal awarding agency, pass-through entity and contact information for awarding official of the pass-through entity. • Assistance listing number and name.; the pass-through entity must identify the dollar amount made available under each Federal award and assistance listings number. • Identification of whether the award is R&D (research and development). 					

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<ul style="list-style-type: none"> Indirect cost rate for the federal award (including if the de minimis rate is charged) per §200.414. <p>Note: If any of this information changes over the course of the subaward, include the changes in subsequent subaward modifications.</p> <ol style="list-style-type: none"> Review the Entity's documentation of monitoring the subaward to determine if the Entity's monitoring provides reasonable assurance that subrecipients used the subaward for authorized purposes and complied with federal statutes, regulations, and the terms and conditions of the subaward. Determine if the Entity verifies that subrecipients expected to be audited as required by 2 CFR Part 200, Subpart F, met this requirement (2 CFR section 200.331(f)). This verification may be performed as part of the required monitoring under 2 CFR section 200.331(d)(2) to ensure the subrecipient takes timely and appropriate action on deficiencies detected through audits. <p>N. SPECIAL TESTS AND PROVISIONS:</p> <ol style="list-style-type: none"> Review the laws, regulations and provisions of grant and contract agreements to identify special tests and provisions. Develop procedures to test these requirements. <p>Miscellaneous Provisions:</p> <ol style="list-style-type: none"> If the Entity is a pass-through agency of federal funds, ensure the appropriate receipts/revenues and disbursements/expenditures are recognized in compliance with GASB 24. Prepare the Data Collection Form. (The Federal programs listed in Part II should be in the same order as the Schedule of Expenditures of Federal Awards and any program with COVID-19 funds should be listed on a separate line and include the prefix "COVID-19, - " in the federal grant program name). Obtain Corrective Action Plan for audit findings, including findings reported under <u>Generally Accepted Government Auditing Standards</u> (GAGAS), from the Entity (prepared on Entity letterhead) and review for propriety. 					

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<p>D. Obtain Summary Schedule of Prior Audit Findings, including findings reported under (GAGAS), from the Entity (prepared on Entity letterhead) and review for propriety.</p> <p>E. Determine if risk of material misstatement due to fraud or error has changed based on results of substantive tests performed. If so, perform appropriate procedures.</p> <p><u>ALTERNATE/ADDITIONAL PROCEDURES:</u></p> <p><u>CONCLUSION:</u></p> <p>We have performed procedures sufficient to achieve the audit objectives for Single Audit requirements and the results of these procedures are adequately documented in the accompanying workpapers.</p>					