

TIPS

- Review past State audits and agency audits – even if CSBG isn't a “major,” do they provide clues?
- Revisit the ACF-issued Terms and Conditions – Are all points addressed within contracts/grant documents/somewhere?
- Know the A-133 Compliance Supplement –
http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2010
and particularly, the CSBG Cluster
http://www.whitehouse.gov/sites/default/files/omb/circulars/a133_compliance/2010/hhs.pdf
(Enter “CFDA 93.569” in the “find” box to zip to the CSBG Cluster).
- Revisit applicable OMB circulars.
- Double check pass-through entity responsibilities (OMB Circular A-133, Subpart D), paraphrased -
 - Ensure that Federal funds are used for authorized purposes in accordance with laws, regulations and provisions of the prime award.
 - Ensure that performance goals are met.
 - Monitor activities to ensure compliance.
 - Ensure that **all** subrecipients expending \$500k or more annually have met the audit requirements for the fiscal year. (A-133 Audit Certification, Guidestar and/or 990s)
 - Issue a management decision (in accordance w/OMB A-133 and w/in 6 months) on audit findings, if necessary, and ensure that the subrecipient takes appropriate and timely corrective action.
 - Provide prime award information to subrecipients (e.g. CFDA title and number, award name, award year, Federal agency).
 - Conduct on-going review and oversight of subrecipient progress and compliance.
 - Require each subrecipient to permit the pass-through entity and auditors to have access to the records and financial statements that allow the pass-through entity to meet its responsibilities.
- Test “is it being done?” Identify the evidence that supports that it **is** being done. Know, . . . if you see a hole, the auditors will too.
- “Scrub” operating documents (grant agreements, State Plan, Policy/Procedure Manuals, . . .) to be sure all points are addressed. Consider using language that mirrors the requirement; it will eliminate the possibility of an unfavorable interpretation.
- Demonstrate that a second set of eyes have reviewed all critical elements (payment orders, program & financial reports, . . .).
- Insure processes are in place to systematically reconcile multiple systems.
- Tap into available resources/experts.
- Understand that staff changes may interrupt solid processes. (Something that was working, now, doesn't work.)
- Learn from the experience; view it as an opportunity to improve.

QUESTIONS TO WHICH THE INITIAL RESPONSE MIGHT BE . . . UHH.

What evidence do you have that those who are receiving a share of the 90% are eligible to receive a share?

Why aren't you submitting an SF-425? Specifically, "could you please provide something that says that you did not have to do the 425 reports for CSBG? I realize that you did not see anything in any of the Terms and Conditions that stated that they were required, but, since the 269 report was converted during the year, I would have expected them to tell you something to the effect that they still wanted the 269, even though the 425 was now being used by most agencies."

What do you use "to determine whether or not something is an allowable cost?"

"How do you make sure that subrecipients are minimizing the time elapsing between the transfer of federal funds from KHRC to the subrecipient and the pay out of those federal funds by the subrecipient for program purposes?"

What evidence do you have that the reviewer is someone different than the preparer . . . ARRA 1512 Report? . . . SF 269A?

"How do you ensure that an entity gets its proportionate share each year?"

"Have you heard any reports of information under the Trafficking in Persons Act?" (Won't do it, will report and will include the requirement in any subaward.)

"Why was your first ARRA report in October . . . not July?" (Dr. Butler's letter of July 24, 2009 – "The first reporting deadline will be October 10, 2009.")

"Do any of the programs involve children under the age of 18?" (Getting to how the smoke-free requirements of the Pro-Children Act of 1994 are made known.)

How did you inform the ARRA subrecipients to "separately identify the expenditures for Federal awards under the Recovery Act on the Schedule of Expenditures of Federal Awards (SEFA) and the Data Collection Form (SF-SAC) required by OMB Circular A-133. This shall be accomplished by identifying expenditures for Federal awards made under Recovery Act separately on the SEFA, and as separate rows under Item 9 of Part III on the SF-SAC by CFDA number, and inclusion of the prefix 'ARRA-' in identifying the name of the Federal program on the SEFA and as the first characters in Item 9d of Part III on the SF-SAC"?