



FISCAL POLICY MANUAL

POLICY RE-2

Grant Subrecipient Monitoring and Management

APPROVED:

Auditor-Controller-Treasurer-Tax Collector (ACTTC)

AUTHORITY:

Auditor-Controller-Treasurer-Tax Collector

ISSUE/REVISED DATE: October 6, 2023

I. PURPOSE

To minimize the County's risk of non-compliance with grant requirements as a pass-through entity.

II. POLICY

It is the responsibility of grantee departments and dependent districts to understand and comply with grant subrecipient monitoring requirements. This includes identifying subrecipients during the award process and including appropriate language in contracts, performing a risk evaluation, performing and documenting adequate and timely subrecipient monitoring and contract management, and compliance with the single audit requirements of 2 CFR Part 200, Subpart F.

This policy supplements Fiscal Policy RE-3 Policies and Procedures for Grants, the objective is to expand on the requirements related to pass-through awards to subrecipients.

III. RESPONSIBILITIES

A. DEPARTMENT

Department staff responsible for contract management shall determine whether each agreement it makes for the disbursement of Federal program funds casts the supplier receiving the funds in the role of a subrecipient or a contractor. The Department is responsible for implementing procedures and maintaining adequate documentation to support that the appropriate level of subrecipient monitoring has been completed.

The following is a list of key items, this list is not all inclusive:

1. **Access to Records:** Contracts shall include provision to ensure access to subrecipient records and financial statements as necessary for the County to comply with federal requirements.
2. **Identification and Notice Requirements:** Contracting staff shall confirm the Assistance Listing Number (ALN) and title, award name, award amount and name of federal agency are listed on all subrecipient contracts. Board items presenting contracts for Board approval must also include the required information in the body of the report.
3. **Risk evaluation:** Contracting staff must evaluate each subrecipient's risk of noncompliance, this evaluation should be documented for purpose of determining the

appropriate subrecipient monitoring. Risk evaluation should be performed during the award process or at the beginning of the contract term so that appropriate monitoring can occur throughout the contract term.

4. Ongoing Monitoring: Contract or program staff must develop a monitoring plan for each subrecipient based on the risk evaluation and adequately document monitoring activities.
5. Review of Subrecipient Single Audit Reports: The designated contact of each department shall:
 - i. Include a Single Audit Data Collection Form (see Example A) as an exhibit in subrecipient contracts.
 - ii. Ensure each subrecipient completes a Single Audit Data Collection Form (see Example A).
 - iii. Compile Single Audit Data Collection Forms into a Subrecipient Monitoring Form (see Example B) to ensure subrecipients meeting the audit requirements of 2 CFR Part 200, Subpart F during the subrecipients' fiscal year, have timely completed a single audit.
 - iv. Collect and review subrecipient single audit reports and confirm awards were reported in their SEFA.
 - v. Create a central location for collected single audit reports.
 - vi. Inform Auditor-Controller-Treasurer-Tax Collector (ACTTC) if audit reports were not received by the due date and take corrective action to obtain these reports.
 - vii. Issue a timely corrective action requirement for subrecipient's single audit findings and ensure subrecipients take appropriate and timely corrective action.
 - viii. In cases of continued inability or unwillingness of a subrecipient to have the required audits, the department shall inform the ACTTC and the County shall take appropriate action using sanctions.

B. ACTTC

If applicable, ACTTC staff shall work with departments to ensure the County takes appropriate action using sanctions.

IV. ATTACHMENTS

Example A: Single Audit Data Collection Form

Example B: Subrecipient Monitoring Form

EXHIBIT A (form to be distributed to all Subrecipients)

Subrecipient Single Audit Data Collection Form	
To be filled out by County Department:	
Contract Number:	
Subrecipient Name:	
ALN Number:	
ALN Title:	
Federal Agency & Title of Award:	
Amount:	
To be filled out by Subrecipient:	
1)	During the fiscal year, did you expend \$750,000 or more in federal awards, including the award referenced above?
	Yes <input type="checkbox"/>
	No <input type="checkbox"/>
	a) If no, no further action is necessary.
	b) If yes, you are required to complete a Single Audit in accordance with Uniform Guidance (2 CFR Part 200), within 9 months of your fiscal year end.
	i) What is your fiscal year end? <input type="text"/>
2)	Please provide a copy of the Single Audit Report when completed and ensure the following:
	a) Expenditures related to the award detailed above are included in the Schedule of Expenditures of Federal Awards (SEFA). Yes/No <input type="checkbox"/>
Comments:	
<p>Please return completed form and Single Audit Report (if applicable) to:</p> <p><i>County Department Contact's name, phone number, email address</i></p>	

EXHIBIT B (form to be maintained by Department as support and be provided to ACTTC or external auditors upon request)

Subrecipient Monitoring Form									
Department Name:									
Department Contact:									
Funding:									
Name of Subrecipient	ALN #	Program Title	Fiscal Year End	Due Date of Single Audit	Amount of Funds Passed Through	Single Audit Required (Y/N)	Copy of Single Audit Received (Y/N)	Date Single Audit Received (If Applicable)	Corrective Action Required (Y/N)
Comments (be sure to document any non-compliance and notify the ACTTC):									
Review Approval Confirmation:									
Reviewed and Approved By:					Date:				
					Thank you for your review! Please send completed workbook to <u>County Department Contact</u>				