STATE OF CONNECTICUT

DEPARTMENT OF EDUCATION



TO: Local School Business Officials

FROM: Nora Chapman

Supervising Accounts Examiner, Office of Internal Audit

DATE: September 3, 2020

SUBJECT: Audit Requirements – 2019-2020 Audits of Federal Awards

and State Financial Assistance

The purpose of this letter is to advise grantees of the Connecticut State Department of Education (CSDE) of the audit requirements associated with Federal Awards and State Financial Assistance. A copy of this letter and the attachments should be provided to your auditor.

Please note that every entity which has received funding from the CSDE must submit the following:

- A Federal Single Audit if their expenditures meet or exceed \$750,000.
- A State Single Audit if their expenditures meet or exceed \$300,000.
- A Notification of Exemption for either the Federal Single Audit and/or State Single Audit (if their expenditures are below the applicable thresholds).

I. Federal Awards

Audits must be conducted on the expenditure of all U.S. Department of Education (USDE) Awards, U.S. Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) Awards (Child Nutrition funds), in accordance with the Office of Management and Budget's (OMB) December 26, 2013 release of the Uniform Guidance for Federal Awards (Uniform Guidance) pursuant to the Single Audit Act Amendments of 1996. Audits must be submitted no later than six months after the close of the entity's fiscal year.

If the entity operates on a fiscal year which is other than July 1 - June 30, please notify the Office of Internal Audit in writing of the date of the fiscal year end. If you have notified us previously of your entity's fiscal year end, you need to provide this information again only if the fiscal year end has changed.

Code of Federal Regulations (CFR)

The Uniform Guidance contains the set of cost principles and audit requirements that apply to grants and subgrants awarded to non-federal entities. Information regarding Grants Management Circulars and Uniform Guidance may be found at:

- www.whitehouse.gov/omb/circulars
- Electronic Code of Federal Regulations

Schedule of Expenditures of Federal Awards (SEFA)

The purpose of the SEFA is to report distributions of federal awards. Separate schedules are required for expenditures of Federal Awards and expenditures of State Financial Assistance. It is imperative that the SEFA accurately identifies all federal programs. To this end, please report the proper Catalog of Federal Domestic Assistance (CFDA) numbers and account codes for all grant programs listed.

Additionally, OMB Uniform Guidance §200.500 (b) (1) now requires that the SEFA include the total amount provided to sub-recipients from each Federal program.

The following may assist you in the completion of your SEFA:

- Attachment I contains a table that lists the CFDA title and number in addition to the CSDE award name and CORE-CT number. Please refer to this information when preparing the SEFA. The 2019-2020 Grant Award Listings are available on the CSDE web site at the Bureau of Fiscal Services' (BFS) Grant Payment Reports page:
 - http://www.csde.state.ct.us/public/dgm/grantreports1/paydetlMain.aspx
- Attachment II contains instructions for accessing and printing the 2019-2020 Grant Award Listings.

Important Note: Coronavirus Aid, Relief and Economic Security Act (CARES Act)

The CARES Act was passed in March 2020 to provide direct economic assistance in response to COVID-19. The Act created an Educational Stabilization Fund to support K-12 schools, colleges and universities during the COVID-19 national emergency. CSDE is the Connecticut state agency that was charged with implementing programs under the CARES act that supported elementary and secondary education.

The major program areas receiving CARES Act funds are as follows:

- Elementary and Secondary School Education Relief Fund
- Child Nutrition Grants

Please note that the revised (August 2020) 2 CFR Part 200 — Compliance Supplement (Appendix VII) contains importation information regarding CARES Act compliance, reporting and auditing requirements.

The OMB is working with federal agencies to identify the needs for additional audit guidance for new COVID-19 related programs and existing programs with compliance requirement changes and plans to publish an addendum to this Supplement in the fall of 2020. The addendum will be posted to the OMB Management website:

https://www.whitehouse.gov/omb/management/office-federal-financial-management/

Audit Exemption

A non-Federal entity that expends less than \$750,000 during the non-Federal entity's fiscal year in Federal awards is exempt from Federal audit requirements for that year, however records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity, and Government Accountability Office (GAO).

Notifications of Exemption must be made in writing to the Office of Internal Audit (email to sde.audit@ct.gov) no later than six (6) months after the end of the entity's fiscal year and include a statement of the amount of federal awards expended.

II. State Financial Assistance

State Financial Assistance provided by the CSDE to municipalities for fiscal years which began on or after July 1, 2019, is to be audited pursuant to the 2009 revisions to the State Single Audit Act, Sections 4-230 through 4-236 of the Connecticut General Statutes (CGS), and applicable regulations:

- Non-state entities that expend \$300,000 or more in its fiscal year in State Financial
 Assistance must have a state single audit performed. Under certain circumstances, an
 auditee may elect to have a program-specific audit conducted. CGS Section 4-231 should be
 consulted for specific guidance relative to this option.
- Additional information regarding the legislative revisions to the State Single Audit Act may be found in Part i Introduction of the Compliance Supplement.

Schedule of Expenditures of State Financial Assistance

The purpose of the Schedule of Expenditures of State Financial Assistance is the reporting of distributions of state financial assistance. As previously mentioned, separate schedules are required for expenditures of Federal Awards and expenditures of State Financial Assistance.

Additionally, the Compliance Supplement now requires grant recipients to report the amounts they have passed through to sub-recipients on the Schedule.

The following may assist you in the completion of your Schedule of Expenditures of State Financial Assistance:

- An illustrative schedule can be found as Example 4 in "Part 9 Illustrative Auditor's Reports
 and Schedules for Local Governmental Entities Municipalities and Audited Agencies and
 Nonprofit Organizations," of the "Compliance Supplement to the State Single Audit Act for
 Fiscal Years Beginning On or After July 1, 2019" issued by the state Office of Policy and
 Management.
- Attachment II contains instructions for accessing and printing the 2019-2020 Grant Award Listings. A listing which identifies State Financial Assistance is available on the CSDE web site at the BFS's Grant Payment Reports page:
 - http://www.csde.state.ct.us/public/dgm/grantreports1/paydetlMain.aspx
- Attachment III contains a table that lists the CSDE award name and CORE-CT number.
 Please refer to this information when preparing the Schedule of Expenditures of State Financial Assistance.

Audit Exemption

A non-state entity that expends less than \$300,000 in its fiscal year in State Financial Assistance is exempt from the state audit requirements for that year. A State Single Audit Filing Exemption Notification must be submitted (See Compliance Supplement— Part 16) to the Office of Policy and Management (OPM) no later than sixty (60) days subsequent to the entity's fiscal year end. Additionally, records must be available for review or audit by appropriate officials of the state agency.

Notifications of Exemption must be made in writing to the Office of Internal Audit (email to sde.audit@ct.gov) no later than six (6) months after the end of the entity's fiscal year and include a statement of the amount of State Financial Assistance expended.

III. <u>Audit Responsibility of Town's within Regional School Districts for Federal and State</u> Prepayment Grants

It is the responsibility of the grantee, as designated on the grant award letter, to provide an audit of

financial awards/assistance. A question regarding audit responsibility sometimes arises in the situation where multiple grantees are members of the same secondary regional school district. In some instances, each grantee may receive prepayment grants from the CSDE. Each grantee then gives its grant funds to the regional school district which contracts to operate the program and expend the funds on behalf of the individual grantees. In these cases, each grantee is responsible for providing an audit of its financial awards/assistance even though program disbursements were made by the regional school district. This may be accomplished by one of the following:

- (a) The regional school district may provide a schedule of expenditures and audit report to each grantee subject to the approval of each grantee's audit firm. Each audit firm may submit the region's audit as an addendum to its audit report for the grantee. Please note that each grantee must provide an audit of its own financial awards/assistance, and its audited grant expenditures are not to be commingled with expenditures from funds of other grantees.
- (b) In the absence of an audit report from the regional district, the grantee's auditor must examine the regional district's records and include a Statement of Cash Receipts, Total Expenditures, and any findings in the schedule submitted to the CSDE.

It is not sufficient to submit an audit report of CSDE funds indicating a lump sum amount as "expenditures" to another agency or institution.

IV. Resolution of Differences Between Audit Amounts and Amounts Filed on the Statement of Expenditures Report (ED-141) for Federal and State Grants

Any differences between the ED-141 filed by the grantee with the CSDE and the audit report must be reconciled and resolved immediately. To facilitate this reconciliation process, the auditee must list the amount of the awards expended for each award year separately. If necessary, the grantee must file a revised ED-141 with CSDE.

V. Audit Report Submission Instructions

Audit reports must be submitted no later than December 31, 2020, via the Electronic Audit Report System (EARS). For entities that do not have a June 30th fiscal year end, audit reports must be submitted six months after the close of the fiscal year or by the extension date granted by the cognizant state agency.

Electronic Audit Report System

EARS is a web site made available by OPM to provide independent auditors an electronic process for uploading audit reports of their clients on-line. In addition, EARS allows State grantor agencies and the public to access and view the reports that have been filed.

- The filing on EARS for all parts of the audit reporting package to be submitted to OPM is mandatory. This includes corrective action plans in response to audit findings.
- The EARS can be accessed at www.appsvcs.opm.ct.gov/Auditing/Home.aspx. Please contact the Municipal Finance Services Section of the Office of Policy and Management at 860-418-6400, if you should encounter any problems or have any questions.
- EARS also allows for the filing of financial audit reports and federal single audit reports that
 would normally be filed with other state agencies whether or not a State Single Audit report is
 being filed.
- Once an electronic version of the reports has been submitted on EARS, no other Single Audit submission directly to CSDE is required.

NC:jc Attachments

Attachment I

2020 SID Codes for Federal Awards									
with Corresponding CFDA Numbers and Titles (where applicable)									
Grant Title	Core Fund	Core SID	CFDA Number	Grant Title per Catalog of Federal Domestic Assistance (CFDA)					
Special School Milk	12060	20500	10.556	Special Milk Program for Children					
School Breakfast	12060	20508	10.553	School Breakfast Program					
Child and Adult Care Food Program	12060	20514	10.558	Child and Adult Care Food Program					
Child and Adult Food Program	12060	20518	10.558	Child and Adult Care Food Program					
Summer Food Service Program - Operational	12060	20540	10.559	Summer Food Service Program for Children					
Cash-in-Lieu/Commodities-CCFP	12060	20544	10.558	Child and Adult Care Food Program					
Summer Food Service Program - Admin	12060	20548	10.559	Summer Food Service Program for Children					
National School Lunch Program Combined	12060	20560	10.555	National School Lunch Program					
Fresh Fruit & Vegetable Program	12060	22051	10.582	Grants for Enhanced Assessment Instruments					
National School Lunch Program – School Equipment	12060	22386	10.579	Child Nutrition Discretionary Grants					
Title I – Grants	12060	20679	84.010A	Title I Grants to Local Educational Agencies					
Title I - Neglected & Delinquent	12060	20680	84.013A	Title I State Agency Program for Neglected and Delinquent Children and Youth					
Voc. Education Act-Carl Perkins	12060	20742	84.048A	Career and Technical Education – Basic Grants to States					
Educ. Homeless Children and Youth	12060	20770	84.196A	Education for Homeless Children and Youth					
Adult Education	12060	20784	84.002A	Adult Education – Basic Grants to States					
Title II Part A Improving Teacher Quality	12060	20858	84.367A	Improving Teacher Quality State Grants					
21st Century Community Learning Centers	12060	20863	84.287C	Twenty-First Century Community Learning Centers					
English Language Acquisition	12060	20868	84.365A	English Language Acquisition Grants					
IDEA-Part B Section 611	12060	20977	84.027A	Special Education Grants to States					
Pre-School (IDEA Part B) Grant	12060	20983	84.173A	Special Education Preschool Grants					
School Improvement Grant	12060	22223	84.377A	School Improvement Grants					
Student Support & Academic Enrichment Grant	12060	22854	84.424A	Student Support & Academic Enrichment					
Emergency Impact Aid for Displaced Students	12060	22911	84.938C	Temporary Emergency Impact Aid for Displaced Students					
Hurricane Recovery Assistance for Homeless Children/Youth	12060	22939	84.938B	Assistance for the Homeless Children and Youth					
Project AWARE	12060	22939	93.243	Substance Abuse and Mental Health Services Administration					

Attachment I (continued)

2020 SID Codes for Federal Awards									
with Corresponding CFDA Numbers and Titles (where applicable)									
Grant Title	Core Fund	Core SID	CFDA Number	Grant Title per Catalog of Federal Domestic Assistance (CFDA)					
Elementary and Secondary School Emergency Relief Fund	12060	29571	84.425D	Elementary and Secondary School Emergency Relief Fund					
National School Lunch – CARES Act	12060	29572	10.555	National School Lunch Program					
Summer Food Service Program Admin – CARES Act	12060	29573	10.559	Summer Food Service Program for Children					
Summer Food Service Program Operational – CARES Act	12060	29574	10.559	Summer Food Service Program for Children					
Child & Adult Food Care Program – CARES Act	12060	29575	10.558	Child and Adult Care Food Program					
School Breakfast Program – CARES Act	12060	29576	10.553	School Breakfast Program					
Special Milk Program for Children – CARES Act	12060	29577	10.556	Special Milk Program for Children					

Attachment II

FY 2019-2020 Grant Listing Instructions

Payment Reports may be accessed at:

http://www.csde.state.ct.us/public/dgm/grantreports1/paydetlMain.aspx

Under A. Select Year, choose 2019-2020.

Under *B. Report type*, choose *Summary*. Once you select the town or other grantee (from the *All Others* category), and either *All Grants* or a specific grant from the drop down list, then click *Submit*. From the next screen, click *Download CSV* to get the coding string breakdown.

If you choose a grantee from the *All Others* category, you must click on the circle that says *All Others* and then choose the grantee which is in alphabetical order by name on the list below.

Please note: In regards to federal awards, the grant titles referenced in the payment report may not be the same as the CFDA Title. When preparing the **Schedule of Expenditures of Federal Awards**, please use the CFDA Title as indicated in Attachment I.

ED-141 Expenditure Reports may be accessed at:

https://www.csde.state.ct.us/

When you click on this link enter the following:

Username: cmed111 Password: ca\$hman

This will get you to the following menu:



Select a menu option below by clicking on it.

- ED-111 Monthly Cash Management Report
- ED-114 Prepayment Grants Budgets & Grant Award Letters
- ED-141 Prepayment Grants Statement of Expenditures

For Help Click Here

If you are interested in summary statistics regarding these data collections, see <u>Commonly Requested Data Table</u>
If you are interested in a brief summary and interpretation of selected data from these data collections, see <u>Data Bulletins</u>

The **Read-Only** Username and Password for these reports are:

Username: grants Password: exprpt

Grantees will use the same Username, Password and Certification codes as those used for the monthly ED-111 Cash Management Report system.

Attachment II (continued)

School Districts

- School Districts access this application through the website: https://www.csde.state.ct.us/districts/
- 2. Enter your first *User Name* and *Password* that you normally use to access this menu. The User Name and Password are case-sensitive.
- 3. From the menu, click on the link: *ED-141 Prepayment Grants Statement of Expenditures*.
- 4. On the Prepayment Grants Log In screen enter your *User Name* and *Password*, the one you usually use for the ED-111 or EFS application. This User Name and Password is not casesensitive.
- Click on **Select** for FY 2019-2020.

Other Grantees

- Other Grantees will access this application through the website: http://www.csde.state.ct.us/
- Enter User Name: cmed111 and Password: ca\$hman. The User Name and Password are case-sensitive.
- 3. From the menu, click on the link: ED-141 Prepayment Grants Statement of Expenditures.
- 4. On the Prepayment Grants Log In screen enter your *User Name* and *Password*, the one you usually use for the ED-111 or EFS application. This User Name and Password is not casesensitive.
- 5. Click on **Select** for FY 2019-2020.

Please note: If you remain idle on these screens for longer than 30 minutes, the system will automatically log you off.

Attachment III

2020 SID Codes for State Financial Assistance						
Grant Title	Core Fund	Core SID	Program Code			
Primary Mental Health	11000	12198				
Leadership Education and Athletics in Partnership	11000	12211				
Neighborhood Youth Centers	11000	12318				
Sheff Settlement	11000	12457				
Parent Trust Fund	11000	12506				
Commissioner's Network	11000	12547				
Local Charter Schools	11000	12549				
Talent Development – TEAM	11000	12552				
School Based Diversion Initiative	11000	12587				
Career Pathways Tech Collaborative	11000	12602				
Sheff Transportation	11000	12610				
American School for the Deaf	11000	16021				
Family Resource Centers	11000	16110				
State Charter Schools	11000	16119				
Child Nutrition State Matching Grant	11000	16211				
Health Foods Initiative	11000	16212				
Vocational Agriculture	11000	17017				
Adult Education	11000	17030				
Nonpublic Health Services	11000	17034				
Two Percent Education Cost Sharing Grant	11000	17041	82002			
Education Equalization Grants	11000	17041	82010			
Alliance District Funding	11000	17041	82164			
Bilingual Education	11000	17042				
Priority School Districts (PSD)	11000	17043	82052			
Interdistrict Cooperation	11000	17045				
State School Breakfast Program	11000	17046				
Excess Cost - Student Based	11000	17047				
Open Choice Program	11000	17053				
Magnet Schools	11000	17057				
After School Programs	11000	17084				
Extended School Hours	11000	17108	82054			
School Accountability – Summer School	11000	17109	82055			
Charter School Building Project and Improvements	12052	43003				
Low Performing Schools	12052	43539 43728				

Attachment IV

Contact Listings

All written correspondence should be sent to:

Mrs. Nora Chapman
Office of Internal Audit
Connecticut State Department of Education
P.O. Box 2219
Hartford, CT 06145-2219

If you have any questions, please contact Justin Cleary at Justin. Cleary@ct.gov or 860-713-6540.

Federal Single Audit

OMB has issued a revised (August 2020) 2 CFR Part 200 — Compliance Supplement (Appendix XI) for auditors to use in performing single and program-specific audits in accordance with 2 CFR Part 200, Subpart F — Audit Requirements. This Compliance Supplement is effective for audits of fiscal years beginning after June 30, 2019, and it supersedes the OMB 2 CFR Part 200 — Compliance Supplement issued in July 2019.

Audit Requirements under 2 CFR Part 200, Subpart F can be accessed on the Internet at:

https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200 main 02.tpl

The August 2020 CFR Part 200 — Compliance Supplement (Appendix XI) can also be obtained from:

- U. S. Government Printing Office 710 North Capitol Street, NW Washington, DC 20401
- Telephone: 866-512-1800 (Toll-Free)
- 县 Fax: 202-512-2104
- Web: https://www.whitehouse.gov/wp-content/uploads/2020/08/2020-Compliance-Supplement_FINAL_08.06.20.pdf

Attachment IV (continued)

State Single Audit

OPM has issued the May 2020 *Compliance Supplement to the State Single Audit Act* for auditors to use in performing state single audits in accordance with CGS 4-230 through 4-236 (2009 Revision). This Compliance Supplement is effective for audits of fiscal years beginning on or after July 1, 2019, and it supersedes all previous compliance supplements and updates issued by OPM.

The May 2020 Compliance Supplement to the State Single Audit Act may be obtained from:

Lori Stevenson
Office of Policy and Management
Intergovernmental Policy Division
450 Capitol Avenue
MS-54SLP
Hartford, CT 06106-1308
Lori.Stevenson@ct.gov

Telephone: 860-418-6402

■ Fax: 860-418-6493

■ Web: www.ct.gov/opm/cwp/view.asp?A=2984&Q=383180