

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



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TO: Child and Adult Care Food Program (CACFP) For-Profit Institutions

FROM: John Frassinelli, Chief

Bureau of Health/Nutrition, Family Services and Adult Education

DATE: December 21, 2015

SUBJECT: Operational Memorandum No. 1P-16

Audit Requirements for For-profit Subrecipients

The Connecticut State Department of Education (CSDE) is required to institute audit procedures applicable to for-profit subrecipients participating in the Child and Adult Care Food Program (CACFP). Each State agency has the authority to establish audit policy for for-profit child care and for-profit adult day care (Title XIX) institutions with regard to the receipt of Federal funds.

In order to maintain continuity between non-profit and for-profit institutions, the CSDE has used Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations* revised June 27, 2003 and June 26, 2007, as a guide for establishing the audit policies for for-profit institutions.

The audit policies and procedures for for-profit child care and for-profit adult day care (Title XIX) institutions participating in CACFP are as follows:

- For-profit institutions that expend \$500,000 or more in a year in total federal awards will be required to have an annual organization-wide audit performed in accordance with the provisions of OMB Circular A-133, Audits of States, Local Governments and Non-Profit Organizations revised June 27, 2003 and June 26, 2007, and the applicable Compliance Supplement (revised June 2015) to be used in conjunction with that audit.
- For-profit institutions that expend total federal awards of more than \$100,000 but less than \$500,000 in a year must submit a copy of the entity's annual audited financial statements (or in lieu thereof, compiled financial statements that include at a minimum, the entity's Balance Sheet and Income Statement), and the enclosed Notice of Audit Exemption form.
- For-profit institutions that expend total federal awards of less than \$100,000 in a year are not required to submit either an annual organization wide audit or audited financial statements, but must still complete and return the enclosed Notice of Audit Exemption form.

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Additionally:

- Federal funds include CACFP program and cash-in-lieu reimbursements, as well as any other Federal funds expended by the institution.
- Cost principles and procedures for the audit will fall under the guidance in 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl
- The cost of the audit is an allowable cost to the CACFP. Those institutions required to have an organization-wide audit performed can, with prior State agency approval, amend their approved CACFP budgets to include the prorated cost of conducting the audit.
- The annual organization-wide audit (for institutions that expend more than \$500,000 in a year in total federal awards) or audited financial statements (for institutions that expend between \$100,000 and \$500,000 in a year in total federal awards) must be submitted to the Connecticut State Department of Education's Child Nutrition Unit within six months from the end of the institution's fiscal year.

The address is as follows:

Connecticut State Department of Education Child Nutrition Unit 25 Industrial Park Road Middletown, CT 06457

- State agencies are required to take immediate corrective action when subrecipients are noncompliant with the audit requirements. Failure to submit the required organization-wide audit, audited financial statements or the *Notice of Audit Exemption* form may result in the State agency instituting the Serious Deficiency process.
- OMB Circulars can be found at: http://www.whitehouse.gov/omb/circulars_default/
- The **June 2015 revision of the** *OMB Circular A-133 Compliance Supplement* can be found at: https://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2015

Please contact Susan Boyle at 860-807-2074, Celia Cordero at 860-807-2076, Benedict Onye at 860-807-2080 or Terese Maineri at 860-807-2145 if you have any questions.

JF:shb

Enclosure

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain in a binder for future reference. All CSDE operational memoranda are posted on the CSDE's Operational Memoranda for the CACFP Web page.

Notice of Audit Exemption

For-Profit Child Care and For-Profit Adult Day Care (Title XIX) Child and Adult Care Food Program Institutions

Instructions: Please complete this form and return it to the State Department of Education, Child Nutrition Unit, 25 Industrial Park Road, Middletown, CT 06457, *ATTENTION:* Susan Boyle no later than February 1, 2016.

Child and	Adult Care Food P	gram (CACFP) Agreement #	
Name of I	nstitution		
Institution	Fiscal Year (check	ne fiscal operating cycle covered by this report):	
☐ Ju	uly 1, 2014 – June 3), 2015	
□ 0	october 1, 2014 – Se	otember 30, 2015	
☐ Ja	anuary 1, 2015– De	ember 31, 2015	
□ 0	other (indicate):	through	
by this rep	oort (<i>approximate a</i>	ds expended during the fiscal operating cycle covered rount from all federal sources): \$	
Audit Exe	mption (<i>check one</i>)		
	This CACFP institution has expended total federal awards of more than \$100,000 but less than \$500,000 for the fiscal year indicated above, and therefore, is not required to have an annual organization-wide audit performed in accordance with the provisions of OMB Circular A-133, but will submit a copy of the entity's audited financial statements to the Child Nutrition Unit upon completion.		
	This CACFP institution has expended total federal awards of less than \$100,000 for the fiscal year indicated above, and therefore, is not required to submit either an annual organization-wide audit or audited financial statements to the Child Nutrition Unit.		
Signature: Authorized Representative (Signature)		Date:	
Αι	ıthorized Represeni	tive (Signature # 1 ED-099)	

Note: For-profit CACFP institutions that expend \$500,000 or more of federal awards in a year are required to have an annual organization-wide audit performed in accordance with the provisions of OMB Circular A-133 and the applicable Compliance Supplement to be used in conjunction with that audit.

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