



# **FEDERAL FINANCIAL MANAGEMENT REQUIREMENTS**

## **An Overview**



# What's Covered

- **Financial Management**
  - Rules and regulations
  - Allowable costs
  - Cost allocation
  - Administrative costs
- **Salary cap requirements**
- **Financial reporting requirements**





## And...

- **Grant Management requirements**
  - Program income
  - Intellectual property
  - Property management
  - Procurement
- **Audit requirements**
- **What else is on your mind??**





# What Are The Rules?

Department of Labor - ETA Grantees Applicable OMB Circulars and Federal Regulations				
	OMB Circulars			DOL Regulations
Nature of Grantee/Subgrantee	Federal Audit Requirements	Federal Cost Principles	Uniform Administrative Requirements	Uniform Administrative Requirements
State/Local, & Indian Tribal Governments	<b>A-133</b> Revised 6/27/03 (effective 12/31/03)	<b>A-87</b> Revised 05/10/04	<b>A-102</b> Amended 8/29/97	29 CFR Part 97
Institutions of Higher Education		<b>A-21</b> Revised 05/10/04	<b>A-110</b> Amended 9/30/99 Republished as <b>2 CFR Part 215</b> 5/11/04	29 CFR Part 95
Non-Profits		<b>A-122</b> Amended 05/10/04		
Hospitals		45 CFR Part 74		
For-Profits	Per program or grant agreement	<b>48 CFR Part 31 (FAR)</b>	Per program or grant agreement	





# Standards

- **Necessary and reasonable**
  - Sound business practices
  - Prudent person principle
- **Allocable**
  - Only charge costs that clearly **BENEFIT** grant
  - Proper allocation methods
- **Authorized or not prohibited**
  - Federal, State, or local laws





## More Standards

- **Consistent treatment**
  - Across all programs
  - Year to year
  - Both indirect and direct
- **Not used for matching requirements**
  - Unless specifically authorized
- **Conform to ETA grant exclusions & limitations**
  - Specific unallowable costs
  - Administrative cost limitation





## And More...

- **Adequately documented**
  - Traceable to source documentation
  - Consistent with GAAP
- **Source documentation**
  - Evidence of authority to incur cost
  - Demonstrate actual amount
  - Receipts for goods
  - Subcontractor invoices
  - Time sheets for staff costs (payroll records)





# Internal Controls

- **System to safeguard integrity of funds**
- **Accounting system**
  - Timely recording of expenditures
  - Qualified personnel
  - Limited access to records
- **Separation of duties**
  - Dual signatures for checks
  - Reconciliations by different staff
  - Timesheets and payroll approvals





## Budget Controls

- **Accounting records need to track to budget categories**
  - Linking spreadsheets or chart of accounts
- **Spending according to quarterly budget estimates**
- **Spending within approved line items**
- **Monitor costs and make adjustments**
- **Indication of potential modification needs**





# The Cost Principles

- **OMB A-21 Educational Institutions**
- **OMB A-87 State/Local Governments and Indian Tribes**
- **OMB A-122 Non-profit Organizations**
- **48 CFR 31 Contract Cost Principles and Procedures dealing with Commercial Organizations**





# Federal Cost Principles

- **Federal government bears only its fair share of costs except where restricted or prohibited by law**
- **Reasonable & Necessary**
  - “Prudent Person Rule”
- **Allocable**
  - Clearly benefit program
  - Both direct & indirect costs





## More Cost Principles

- **Authorized or not prohibited**
  - Federal or state statutes
- **Consistent with the Federal Rules & Circulars**
- **Consistent treatment**
  - Across time & program lines
  - Direct & indirect costs





## Cost Principles continued...

- **Not used as match**
  - Unless specifically authorized
- **Documented**
  - Traceable to source documentation
- **Consistent with GAAP**
  - Accounting standards & treatment
- **Conform to limitations/exclusions**
- **Net of applicable credits**





## Selected Items of Cost

- **A-21, Section J**
- **54 items of cost**
- **3 types of Costs**
  - Allowable
  - Unallowable
  - Allowable with Conditions
- **If Cost not Treated-**
  - Principles of necessary and reasonable apply





## Unallowable Costs

- **Specifically identified in the grant/contract as being unallowable**
  - Real property
- **Specifically identified in the applicable Circular as being unallowable**
  - Alcohol, entertainment
- **Does not meet the criteria listed in the applicable Circular to be allowable**
  - Sole source contracts without following requirements





# Prohibited Activities

- **Employment generating**
  - Specific exceptions
- **Public service employment**
  - Allowable with conditions under some programs
- **Business relocation**
- **Sectarian activities**





# Cost Allocation

- **Direct**
  - Single cost objective
- **Shared**
  - Multiple cost objectives,  
or
  - Multiple fund sources
- **Indirect**
  - F & A costs
  - SWICAP





## Indirect Costs

- **Allowable to the extent**
  - Contained in a Cost Allocation Plan
    - Identify as a separate cost pool & allocated to programs based on equitable benefit
    - Approved by cognizant Federal Agency, if required
- **Must be within Administrative Cost limitations**
- **Generally overhead costs of organization**
  - Can not include unallowable costs such as fundraising





# Treatment of Costs

- **Consistent treatment**
  - In accounting system
  - Over time
- **Measuring benefit**
  - Critical requirement of cost allocation
  - Benefit determines allocation





## **Allocation Bases**

- **Fair basis**
- **Minimal distortion**
- **Actual effort or cost**
- **General acceptability**
- **Timely control**
- **Variations in funding/costs**
- **Materiality, cost, and practicality of use**





## Allocating Personal Services

- **Based on documented & approved payrolls**
- **Supported by time distribution system**
  - As specified in OMB Circulars
  - Method of allocation & support for allocation varies
- **Major part of allocated costs**





## **Unacceptable Allocation Bases**

- **Fail to meet standards**
- **Distort final results**
- **No direct relationship to costs**
- **Developed from plans, budgets, or estimates**
- **Allocation must result in equitable distribution of costs**





## Cost Allocation Plans

- **Written documentation of**
  - Direct and allocated costs
  - Allocation methods used
- **Supported by formal accounting records**
- **Signed by authorized agency official**





## **PL 109-234**

- **Applies to all ETA appropriated funds**
  - All grants, contracts and interagency agreements
- **Limits salary and bonus payments to individuals**
- **Implementation guidance in TEGL 5-06**





## Who is Covered?

- **Individuals paid with ETA appropriated funds**
- **Direct recipients and all subrecipients**
- **Direct costs and costs paid through an Indirect Cost Rate**
- **Vendors are not subject to limitation**
  - More on this later





## What is Subject to Limitation

- **Covered individuals**
  - Anyone receiving wages or bonus payments from subrecipients from ETA appropriations
- **Salaries paid at a specific rate**
- **Bonus payments paid to the individual**
- **Exclusions**
  - Fringe benefits
  - Non-monetary compensation such as a car





## Salaries

- **Wages paid to an individual in accordance with IRS instructions**
  - Included in W-2
  - Full Time RATE not exceed Executive Level II
  - 2007 maximum is \$168,000
  - 2008 maximum is \$172,200
  - Adjusted annually by OPM
- **Expressed as annual or hourly amount**
- **Calendar year basis – IRS definition**





## **Bonuses**

- **Included in IRS form W-2**
  - Reported as income on form 1040
- **Includes monetary awards, bonus payments, and monetary prizes**
- **Calendar year application – same as salaries**
- **Excludes non-monetary compensation and corporate profit**





## Profits and Profit Sharing

- **Corporate profits paid on per share basis that have required investment are excluded**
- **Profit sharing, when part of personnel policies, as supplement to salary are included**
- **Sole proprietor or partnership**
  - Income realized on Schedule C or E, IRS Form 1040





## **Other Considerations**

- **States may set lower limits for subrecipients**
- **Salaries paid by multiple fund sources must be allocated and calculated accordingly**
- **Salaries paid through indirect cost rates must be calculated accordingly**





# Cost Categories

- **Only 2 cost categories**
  - Administration
  - Program activities
- **Reporting categories**
  - As specified on the ETA 9130
  - Classify within books of account
  - Classify through linking spreadsheets





# Administrative Costs

- **20 CFR 667.220(a)**
- **Not related to direct services**
  - Either to clients or employers
- **List of specific functions**
  - Unlike traditional definitions
- **Limitation**
  - Percentage specified in grant award
  - Based on grant award amount





# Administrative Functions

- **Overall general administrative functions**
  - Accounting, financial, & cash management
  - Procurement
  - Property management
  - Personnel management
  - Payroll
- **Coordinating resolution of findings**
  - Audit, monitoring, investigations





# Administrative Functions

- **General administrative functions**
  - Audit functions
  - General legal services
  - Developing systems and procedures
    - Includes information systems
    - Required for administrative functions
  - Monitoring of administrative functions





# Administrative Costs

- **Goods & services**
  - Required for administrative functions
- **Travel costs**
  - Carry out administrative activities
  - Related to overall management
- **Awards for administrative functions**
  - Payroll service for staff





## Administrative Costs

- **Administrative cost limitation is specific for each formula and discretionary grant**
- **Measured at conclusion of grant period**
- **Tracked, accounted for & reported**
  - Must be appropriately allocated and cost allocation plans should be:
    - Supported by methodology documentation
    - Reconciled at regular intervals





# Indirect Costs & Admin Limits





# Property

- **Capital Assets**
  - 29 CFR 95.2(ee)
  - 29 CFR 97.3
- **Property defined as real property, equipment, intangible property and debt instruments.**





# Real Property

- **29 CFR 95.2(ff)**
- **29 CFR 97.3**
- **Real Property defined as land, structures, improvements and additions**
- **Costs of real property NOT allowable**
  - Specific exceptions





## Renovations & Alterations

- **Addressed in OMB Circulars-selected items of cost**
- **Allowable costs**
  - Cannot impact equity value
- **Prior approval of the Grant Officer**
- **Examples**
  - Refitting laboratory space-yes
  - Internal reconfiguration of offices-yes
  - HVAC system installation-no





# Equipment

- Acquisition cost of \$5,000 or more
- Tangible
- Useful life of 1 year or more
- Prior approval requirements
- Title remains with grantee





# Prior Approval

- **Submit detailed description to FPO**
  - Requested in writing
- **Must be approved by Grant Officer**
  - Prior means Before
    - Costs are incurred
- **Budget description**
  - Approval of budget is not equipment approval
  - Unless specific in grant award letter





# Property Management

- **29 CFR 95.30-37**
- **Management System**
  - Required of all grantees
  - Acquisition costs
  - Serial numbers
  - Other identifying information
  - % of Federal participation
  - Condition & use data





# Management System

- **Physical inventory**
- **Loss prevention & control system**
- **Maintenance procedures**
- **Disposition process**
  - Awarding agency instructions
  - Use in other programs
  - Based on fair market value
  - Compensation to Federal funding agency





# Supplies

- **Any tangible personal property other than equipment**
- **Title remains with grantee**
- **Disposition**
  - Aggregate fair market value





# Program Income

- **29 CFR 97.25 & 29 CFR 97.25**
  - Address earning, accounting and reporting of funds
- **Income generated**
  - Grant supported activity
  - During grant period
- **Addition method required**
  - 20 CFR 667.200





## What's Included

- Fees for services
- Sale of products
- User or rental fees
- List included in Part 97





# WIA Requirements

- **Interest income**
  - All WIA Title I programs
  - Allocated if earned under WIA and non-WIA
- **Revenues in excess of expenditures**
  - Applies to governmental or nonprofit entities
  - Applies to all WIA Title I programs
    - Community College, High-Growth





## **What's Not Included**

- **Applicable credits**
- **Sale of property**
- **Royalties**
- **Donations**
- **Profits of commercial organizations**
- **Income earned after the grant period**
- **Interest (non-WIA) & matching funds**





## More Program Income

- **Addition method required - WIA**
  - 20 CFR 667.200(a)(5)
- **Reported on ETA 9130**
- **Expenditure within grant period**
- **ETA does not reduce grant awards**
  - Addition method always applies
- **Both revenues and expenditures identified in books of account**





## **Use of Program Income**

- **No administrative cost limitation**
- **Allowable activities**
- **Allowable costs and proper classification**
- **Included in the scope of audit**
- **Other administrative rules apply**
- **Sanctions for misuse**





# Procurement Principles

- Applies to ALL grantees, subrecipients, & sub-awards.
- Must maintain a system for administration of contracts
- “Full & Open Competition”





# Procurement Requirements

- **OMB Circulars**
- **DOL-ETA Federal regulations**
- **If a pass through agency –**
  - grant recipient issued policy or guidance
- **Specific requirements and special clauses contained in the grant agreement**





# Procurement Standards

- **Written procedures**
- **Written code of conduct & conflict of interest policies**
- **Procedures to review procurements**
  - Cost price analysis (determination of needs, costs, estimates, etc.)
  - Demonstrated ability to perform
- **Close-out & protest process of contracts**





## Partner? Vendor? Recipient?

- **Regardless of the name, it is the relationship between the two parties that matters**
- **Definitions**
  - OMB Circular A-133, Item 210 and/or 29 CFR 99.210
    - Can anyone buy their product or service (off the shelf)?  
Or
    - Is the product or service customized to fit your program needs?  
Or
    - Are DOL funds passed on to this agency from a direct grant recipient?





## Subrecipients & Vendors

- **Subrecipients & vendors can:**
  - Receive funds directly from a Federal agency
  - Receive funds through a sub-award or pass-thru from a grantee
- **Difference between subrecipients & vendors is:**
  - Critical in determination of applicable Federal grant management requirements & rules
    - Sub-recipients must follow such rules & vendors do not





## Recipient & Subrecipient

- **Direct award**
- **Sub-award of Federal funds**
- **Provides a service/product**
  - Fulfills a program goal/need
- **Customized to meet requirements**
- **Can be a non-profit entity, local government or a commercial entity**
- **Subject to Federal requirements**





# Vendor

- **Services or goods are purchased “off the shelf”**
- **Vendor**
  - A dealer, distributor, merchant, or seller of goods and services
  - Available to the general public
  - Within normal business operations
  - Operates in a competitive environment
- **Not subject to Federal requirements**





## Partner or Provider

- **Partner**
  - Joint proposal for funding
  - Integral part of scope of work
  - One partner receives grant award
    - On behalf of the partnership
- **Provider**
  - Performs in accordance with specifications
  - Usually procured through an RFP
  - May be subrecipient or vendor





# Procurement Methods

1. **Small purchase - INFORMAL**
2. **Sealed bids – FORMAL (technical specifications & price)**
3. **Competitive proposals – FORMAL (request for proposals)**
4. **Non-competitive proposals – sole source or limited competition**





## **Cost Reimbursement Agreements**

- **Service-based, higher-risk**
- **Approved budget**
- **Billed based on actual allowable costs incurred and invoiced.**
- **Must track performance closely!**
- **Required for work between governmental entities (city to state, etc.)**





## Fixed Price Agreements

- **Performance based- low risk**
- **Approved budget**
- **Approved payment units easily measured**
  - Per unit payment based on completion of activity
  - Can use Payment Points (% of payment per type of activity).
    - \$500 completion of training
    - \$300 at placement
    - \$250 for 90 day retention, etc.
- **Report & verify earned program income**





# Procurement Cycle

- **Cost / Price Analysis**
- **Solicitation**
- **Evaluation**
- **Negotiation (Costs and/or Fixed Fee)**
- **Selection & Award**
- **Contract Administration**
- **Closeout**





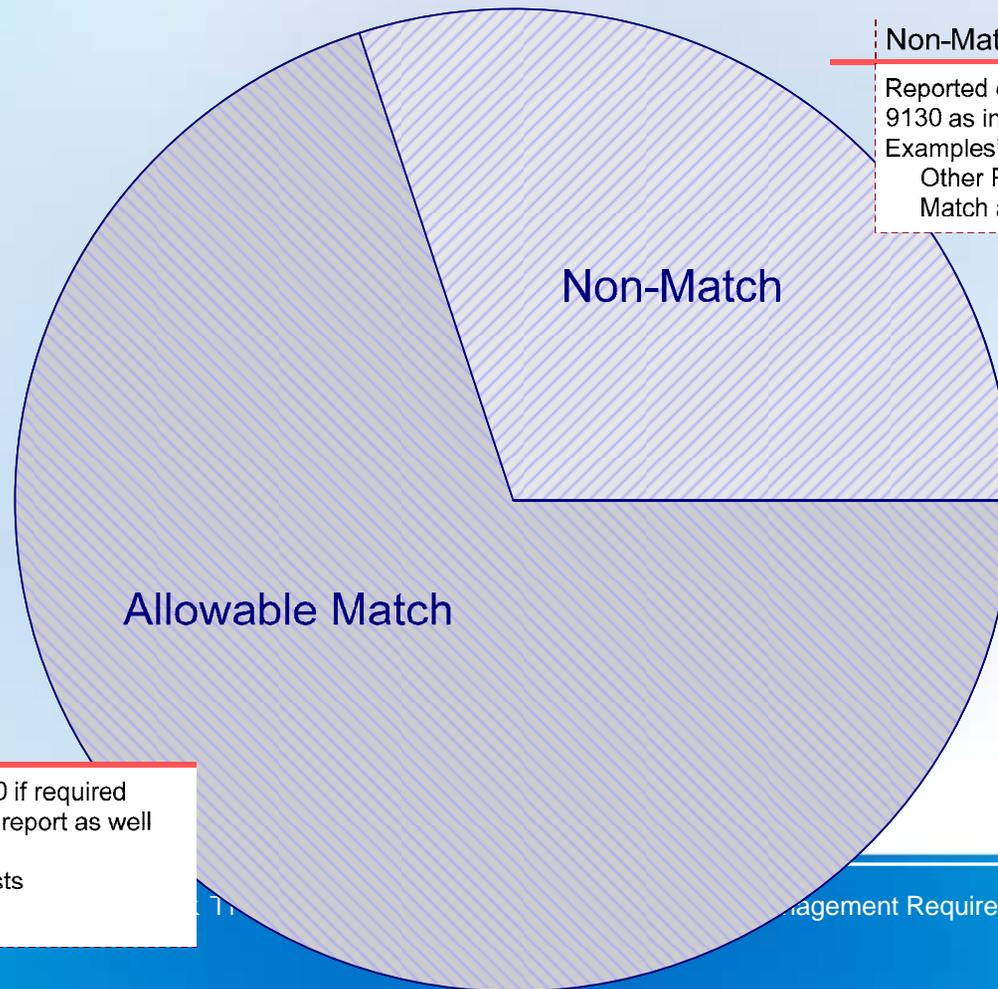
# Contract Clauses

- **Agreements**
  - Fixed-price or reimbursement
  - Agreements with nonprofits
    - Excess revenues = program income
- **Every agreement must contain clauses**
  - 29 CFR 95.48
  - 29 CFR Part 95, Appendix A
- **One-Stop TAG Chapter II-10**
  - Provides additional guidance and examples





## Leveraged Resources



### Non-Match

Reported on performance report and 9130 as instructed

Examples:

- Other Federal program costs
- Match above requirement

### Allowable Match

Reported on the ETA 9130 if required  
Reported on performance report as well

Examples:

- Unclaimed Indirect Costs
- Donated Space Costs



## Leveraged Resources

- **Allowable match**
  - Non-Federal funds used for grant purposes
  - Reported on the ETA 9130
- **Non-match**
  - Funds available for the project that don't meet criteria for allowable match
  - Reported on the performance report
  - Federal funds also reported on ETA 9130





## Budgets

- **Only required match is shown on the SF-424a**
- **Do not include leveraged resources on the SF-424a**
- **Amounts shown on SF-424**
  - Considered as match
  - If not met, may lead to disallowance or grant reduction





## Examples

- **Federal funds expended by other organizations**
- **Foundation grants expended by partners**
- **Scholarships for participants not paid by grant funds**
- **City donated bus tokens**





# What is Intellectual Property

- **Tangible & intangible property**
- **Examples**
  - Training models
  - Curricula
  - Videos & other media
  - Technical assistance products





## Who Owns It?

- **The developer retains title or ownership**
- **The Federal grantor (DOL) retains**
  - Rights in distribution
  - This means that DOL may distribute in whole or in part, any such property developed with grant funds
- **Rights accrue only to the Department**





# Requirements

- **29 CFR 97.34 Copyrights**
- **29 CFR 95.36 Intangible Property**
  - Provide Federal agency with rights to distribute, use, copy, etc. any materials developed with grant funds
- **Grant Agreement, Additional Provisions**
  - Requires grantee to provide ETA with all materials, curricula, training models, etc.
  - Products posted on Workforce3One





## **IP Issues**

- **Distribution rights for products developed with match funds**
- **For electronic media, issues of hosting**
- **Confidential or proprietary information**
- **Length of retention for products**
- **Ability to sell or license products**





# Financial Reporting Requirements

- **DOL Regulations**
  - 29 CFR 97.41
  - 29 CFR 95.52
- **Program-specific regulations**
- **Grant agreement specifications**
- **Financial cooperative agreements**





# ETA 9130

- **NEW Required Financial Report**
- **To be used for ALL ETA programs**
- **Program-specific data elements**
- **Cash information**





# Reporting Basics

- **BASIS - Accrual**
- **FREQUENCY – Quarterly**
- **DUE – 45 Days after quarter end  
for ALL ETA Programs**





## More Reporting Basics

- **Final Quarterly Report**
  - Due 45 days after grant end or expiration of funds (whichever comes first)
- **Closeout Report**
  - Due 90 days after grant end (triggered by DOL acceptance of Final Report)
- **Transmission Method**
  - ETA on-line reporting system





# Federal Cash

- **10.a. Cash Receipts**
  - tied to PMS drawdowns
- **10.b. Cash Disbursements**
  - checks, cash, advances to subs
- **10.c. Cash on Hand**
  - 10.a. minus 10.b.





# Federal Expenditures and Unobligated Balance

- **10.d. Total Federal Funds Authorized**
  - Grant award
- **10.e. Federal Share of Expenditures**
  - Cash disbursements PLUS goods/services received but not paid





# Federal Funds Authorized

- **Pre-entered for most ETA grants**
  - First reporting quarter
- **Reflects grant award total**
  - Updates with modifications





# Federal Expenditures and Unobligated Balance

- **10.f. Total Administrative Expenditures**
- **NEW line item**
- **The portion of line 10.e.(expenditures) attributable to administrative costs**
- **Follow appropriate guidance on administrative vs. program costs**





# Administrative Cost Limitations

- **Set forth in most ETA grant agreements**
  - 10% for Earmark grants
- **Line 10.f. identifies administrative portion of total federal expenditures**
- **Provides ability to assess compliance with administrative limitation**





# Federal Expenditures and Unobligated Balance

- **Line 10.g. Federal Unliquidated Obligations**
  - Equals line 10.h.(Obligations) minus line 10.e. (Expenditures)
- **Line 10.h.Total Federal Obligations**
  - Equals line 10.e plus line 10.g.
- **Line 10.i. Unobligated Balance of Federal funds**
  - Equals line 10d.(Authorized) minus line 10.h.(Obligations)





## Recipient Share

- **Line 10.j. Total Recipient Share Required**
  - Match requirements
  - Will be zero for Earmark grants
- **Line 10.k. Recipient Share of Expenditures**
  - Non-DOL/non-federal expenditures incurred for purposes of subject grant
- **Line 10.l. Recipient Share of Unliquidated Obligations**
  - Equals line 10.m.(obligations) minus 10.k (expenditures)





## Recipient Share

- **Line 10.m. Total Recipient Obligations**
  - Equals line 10.k.(expenditures) plus line 10.l.(unliquidated obligations)
- **Line 10.n. Remaining Recipient Share to Be Provided**
  - Equals line 10.j.(required) minus line 10.m.(obligated)
  - Will be zero





# Program Income

- **Line 10.o. Total Federal Program Income Earned**
- **Line 10.p. Program Income Expended**
- **Line 10.q. Unexpended Program Income**





## Program Income Method

- **ADDITION** method required for all ETA programs
- Revenue earned as result of allowable grant activity
- **Added** to grant to further eligible program objectives
  - ETA does not reduce grant award amounts





## Accounting for Program Income

- **NET** – Line 10.o. reflects total PI earned minus costs incidental to generation
  - \*\* No cost reported on line 10.e.
- **or**
- **GROSS** – Line 10.o. reflects 100% of PI earned
  - \*\* Costs incidental to generation reported on line 10.e.





# Additional Expenditure Data Required

- **Section 11**
  - Federal leveraged funds
- **11.a. Other Federal Funds Expended**
- **Required if non-grant Federal funds are expended for grant purposes**
  - WIA funds expended on tuition





# Accrual Reporting

- **Required for ALL ETA programs**
- **Provides more reliable data**
- **Cash basis understates true spending**
- **Failure to report on accrual basis may result in loss of funds**





# **Accrued Expenditures**

**Cash Disbursements**

**PLUS**

**Goods and services received  
but not yet paid for**





## Common Accruals

- **Salaries of employees**
  - Paid subsequent to work performed
- **Training**
  - Tuition paid prior to completion
- **Travel expenses**
  - Reimbursement subsequent to travel
- **Public utilities**





## What are Not Accruals?

- **Obligations**
  - Goods or services have NOT been received
- **Orders placed for which**
  - Goods or services have NOT been received or paid
- **Performance contracts**
  - Benchmarks have NOT been achieved





# Obligations



- UNDELIVERED ORDERS -UNPAID



**UNLIQUIDATED  
OBLIGATIONS**

- DELIVERED ORDERS - UNPAID

- DELIVERED ORDERS - PAID



**ACCRUED  
EXPENDITURES**





# Online Reporting System

- **Program-specific software with required data elements provided to grantees**
- **Pop-up instructions embedded for quick and easy reference**





# Accessing Reporting System

- **Follow instructions**
  - Grant transmittal letter or as otherwise provided by ETA
- **Grantee provides requested contact information**
- **e-mail is sent to primary contact**
  - Contains password and PIN





# On-Line Reporting

- Password used to access reporting system
- PIN used to certify submitted report
- Instructions on how to use system embedded in report





## On-Line Reporting

- **Mandatory quarterly submission**
- **Modifications can be made**
  - Until report is locked
  - requires re-certification of report
- **After 2 quarters of data are accepted by Federal Project Officer, 1<sup>st</sup> of 2 quarters will lock**





## Data Integrity

- **Grantees are responsible for data**
- **Incomplete or erroneous data and/or late submittal of reports impacts ETA's financial credibility**
- **Expending current year funds in the current period**
  - Key to ETA future funding levels





# Reporting Resources

- **Forms and Instructions**
  - <http://www.doleta.gov/grants>
- **Questions go first to your Federal Project Officer**
- **On-Line Reporting System - Password and PIN**
  - Shantay Logan – [logan.shantay@dol.gov](mailto:logan.shantay@dol.gov)
  - Elizabeth Norris – [norris.elizabeth@dol.gov](mailto:norris.elizabeth@dol.gov)





## Single Audit Act Audits

- **Government-wide auditing standards**
- **Audit responsibilities at each level**
- **Expenditure threshold of \$500,000**
  - Total combined Federal expenditures
  - Within organization's fiscal year
- **No requirements for commercial organizations**





## **SAA, Continued**

- **Annual audits**
  - Exceptions
- **Submission**
  - Within 1 month of completion
  - No later than 9 months
- **Applies to all recipients and subrecipients**





# Commercial Requirements

- **Direct recipients**
  - ETA responsible for audit
  - 29 CFR 96.32
- **Subrecipients**
  - Organization wide or program specific audit
  - \$500,000 expenditure threshold





# Federal Audit Clearing House

- **Send Single Audit Reports to:**
  - Federal Audit Clearinghouse - FAC  
Bureau of the Census  
1201 East 10th Street  
Jeffersonville, IN 47132
- **FAC's website allows users to query its audit database**
  - <http://harvester.census.gov/sac/>





# Regulatory References

- **OMB Circular A-133**
  - Including the Compliance Supplement
- **29 CFR Part 96**
- **29 CFR Part 99**
- **Auditing standards – Yellow Book**
- **DOL's Office of Inspector General (OIG) summarizes the audit requirements on their website**
  - <http://www.oig.dol.gov/public/reports/oa/documents/singleau ditcfoBrochure.pdf>





# Auditee Responsibilities

- **Entities that pass through federal funds to subrecipients are responsible for:**
  - Monitoring to ensure compliance with federal requirements
  - Ensuring that the requirements of A-133 and the grant are met
  - Preparing management decisions on subrecipient audit findings





## Record Retention

- 29 CFR 95.53
- Financial & program records
- Supporting documents
- Other records
  - Pertinent to grant
- Apply equally to grantees & subgrantees





# Access Records

- **Who?**
  - DOL
  - Comptroller General
  - Grant recipient
  - Director, Office of Civil Rights
- **What?**
  - Books, documents, papers, & other records





# Access to Records

- **Recipients/subrecipients**
  - Define conditions for providing access
- **FOIA & Privacy Act**
  - Applies only to records transferred to Secretary
- **Fees only to recover costs of process information requests**





## Closeout

- **Perform the following:**
  - Liquidate all obligations
  - Submit all required reports
  - Refund any obligated funds/cash
  - Account for all real or personal property
- **Completed**
  - 90 days of expiration of grant period





## On-line Training Resources

- **www.workforce3one.org**
  - Interactive communications and learning platform designed to build the capacity of the Workforce Investment System to develop strategies that enable individuals to be successful in the 21st century economy.
  - Recorded sessions:
    - Grant Management Requirements – April 11<sup>th</sup>
      - [www.workforce3one.org/view.cfm?id=4913](http://www.workforce3one.org/view.cfm?id=4913)
    - Financial Management – April 4<sup>th</sup>
      - [www.workforce3one.org/view.cfm?id=4887](http://www.workforce3one.org/view.cfm?id=4887)
    - Financial Reporting – April 11<sup>th</sup>
      - [www.workforce3one.org/view.cfm?id=4904](http://www.workforce3one.org/view.cfm?id=4904)





# Questions?

Ask your FPO

Workforce3One  
recordings

