OPERATIONS ISSUANCE NO. 2017-13

DATE: March 16, 2017

TO: Adult & Youth Program Service Providers
    America’s Job Center of California Operators

FROM: Chris Burlaka
      Chief Financial Officer

SUBJECT: FY 2015-2016 AUDIT REQUIREMENTS & QUESTIONNAIRE

PURPOSE

This operations issuance is to transmit an updated copy of the Subrecipient Questionnaire (Attachment A) for completion and submittal to the San Diego Workforce Partnership (SDWP), and a reference to the Office of Management and Budget (OMB) Uniform Guidance, 2CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart F.

AUDIT THRESHOLD

The OMB Uniform Guidance audit threshold is $750,000. This applies to non-profits and local government organizations that expend $750,000 or more per year in Federal awards (all sources). This includes all Federal awards and not only those awarded under WIOA. SDWP will consider additional compliance monitoring or other actions for agencies with less than $750,000 per year in Federal awards. Non-profit and government organizations may not charge the cost of an audit to WIOA or any other Federal grant, if the organization expended less than $750,000 in total Federal Awards. Note that this Federal rule supersedes and replaces any conflicting requirements in your contracts, including the SDWP Operations Manual and previous Operations Issuances.

AUDITOR INDEPENDENCE REQUIREMENTS

An auditor that prepares the indirect cost proposal or cost allocation plan for an organization, when indirect costs exceeded $1 million in the prior year may not perform the organization’s audit required by OMB Uniform Guidance (Attachment B).

REPORT DUE DATE
The audit reports of subrecipients are to be completed within 9 months after the end of the subrecipient’s fiscal year and are to be delivered to SDWP within thirty (30) days after the completion of the audit.

The revised OMB Uniform Guidance contains additional requirements, which are less significant, and we encourage organizations to carefully read the OMB Uniform Guidance and appropriately comply with these regulations if they are not already part of the organization’s policies and procedures. The OMB Uniform Guidance is law and must be followed.

**SUBRECIPIENT QUESTIONNAIRE REQUIREMENT**

Subrecipients are required to complete and return the attached “Subrecipient Questionnaire” to SDWP **no later than Friday, March 31, 2017**. This correctly completed questionnaire will help us to identify your audit requirements. This is not a substitute for, or all inclusive of OMB Uniform Guidance requirements. Appropriate personnel in your organization should review this circular and make decisions as to the particular audit requirements applicable to your organization.

**Failure to submit your correctly completed questionnaire by Friday, March 31, 2017 shall result in a suspension of all contract invoice reimbursements and/or other sanctions for your organization.**

If you have any questions regarding this issuance contact your Program Specialist at (619) 228-2900.

**Attachments**

A. [Subrecipient Questionnaire](#)
B. [OMB Uniform Guidance](#)

cc: Workforce Partnership Internal Distribution List
Simpson & Simpson CPA’s. LLP