Best Practices for Grant Administration



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BEST PRACTICES

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LEGAL ASSISTANCE

Resources regarding answers relating to audit matters and other topics of common interest.

LOUISIANA GOVERNMENTAL AUDIT GUIDE

The Louisiana Governmental Audit Guide (LAGAG) provides resources to set forth the standards by which the engagements of local governments and quasi-public organizations (local auditees) are to be performed.



Best Practices for Grants Administration

- 1. Internal Controls
- 2. SEFA Preparation
- 3. Grants Management





Top 10 Audit Findings for Local Governments

- 1. Inadequate internal controls, improper segregation of duties
- 2. Noncompliance with the Local Government Budget Act
- 3. Inadequate grant administration
- 4. Inadequate reconciliations
- 5. Incomplete or poor accounting records and documentation
- 6. Late filing of the audit report with the Legislative Auditor
- 7. Failure to provide financial reports to the governing body
- 8. Inadequate or lack of written policies and procedures
- 9. Noncompliance with bond covenants
- 10. Noncompliance with the Open Meetings Law; failure to file and pay payroll taxes timely



Types of Internal Control Findings

- 1. Amounts don't agree with supporting documentation
- 2. Lack of evidence of approvals
- 3. Inaccurate data entry (coding, dates, etc.)
- 4. Failure to follow written policies and procedures
- 5. Failure to comply with Single Audit internal control requirements
- 6. Lack of evidence of reviews
- 7. Failure to reconcile, incorrect reconciliations, untimely reconciliations
- 8. Improper segregation of incompatible duties (custody, authorization, recording, reconciling), inadequately trained staff
- 9. Lack of controls over leave (no records, no written policy, no approval, no deductions from balances, etc.)
- 10. Unlimited computer and software access



Internal Controls Simply Defined

Internal controls are nothing more (or less) than **the combination of people, policies, and procedures** that managers rely upon to be able to provide positive answers to these questions:

- How do I know that my organization is operating effectively and efficiently and is safeguarding its assets?
- How do I know that financial statements and other reports can be relied upon?
- How do I know that my organization is complying with applicable laws, regulations and policies?

Stephen J. Gauthier, former Director of Technical Services, Government Finance Officers Association (GFOA)



The Only Thing We Can Control is Opportunity



- Lack or end-around of internal controls
- Senior management not watching

MOTIVE/PRESSURE

- ▶ Personal financial pressure
- ▶ Addiction

RATIONALIZATION

- "I haven't received a raise"
- "It's only a loan; I'll pay it back."



Internal Control Roles and Responsibilities

- The CEO (Superintendent) has primary responsibility for the system of internal controls
- The governing body (School Board) oversees management, provides direction, and is ultimately responsible
- Internal auditors independently validate management's assertions
- Everyone in the organization has responsibility for internal control – risk assessment and performance
- Outside parties (vendors and contractors) may perform aspects of internal control



GFOA Best Practice: Internal Control Framework

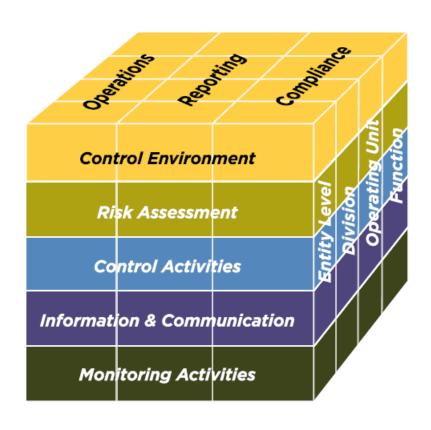


GFOA recommends that state and local governments adopt the COSO's Internal Control – Integrated Framework (2013) as the conceptual basis for designing, implementing, operating, and evaluating internal control so as to provide reasonable assurance that they are achieving their operational, reporting, and compliance objectives. To implement that guidance, a government should

- 1. Establish a **comprehensive framework** for internal control that includes all five essential components identified by COSO;
- 2. Ensure that each component of internal control is **functioning** in a manner consistent with all relevant *Integrated Framework* principles; and
- 3. Ensure that various components compliment one another and operate together effectively.



COSO Integrated Framework



- 3 categories of objectives are across the top
- 5 essential components of internal control are down the front
- Organizational structure is across the side



GFOA Best Practice: Internal Control for Grants

It is crucial that governments have the proper framework for internal control to ensure that

- Federal, state, local, and private entity grant funds are being utilized effectively and efficiently;
- Assets purchased or developed with grant funds are being safeguarded properly;
- Financial and other reporting required by these grants is accurate and timely; and
- Grant resources are being utilized in **compliance** with appropriate laws and regulations.



GFOA Best Practice: Internal Control for Grants



GFOA recommends that governments adhere to a comprehensive framework of internal control for grants that includes components of

- 1. Control environment,
- 2. Risk assessment,
- 3. Control activities,
- 4. Information and communication, and
- 5. Monitoring.



Control Environment

- The control environment is the set of standards, processes, and structures that provide the basis for carrying out internal control across the organization.
- The governing body and senior management establish the tone
 at the top regarding the importance of internal control including
 expected standards of conduct.
- Management reinforces expectations at the various levels of the organization.



The Control Environment Comprises

- √The integrity and ethical values of the organization;
- √The parameters enabling the governing body to carry out its governance oversight responsibilities;
- √The organizational structure and assignment of authority and responsibility;
- ✓The process for attracting, developing, and retaining competent individuals; and
- ✓ The rigor around performance measures to drive accountability to performance.



Control Environment for Grants Administration



- 1. Alert agencies that **policy decisions** concerning grants are made entity-wide to ensure consistency and adherence to strategic planning goals;
- 2. Ensure that each area of the grant process (programmatic, budgeting, accounting, etc.) is managed by **competent staff** who are trained and knowledgeable in their areas of responsibility;
- 3. Give staff **authority and responsibility** for their tasks associated with the grant;
- 4. Hold staff accountable for their tasks; and
- 5. In larger organizations, create cross-functional teams to support entity-wide grants management.



Risk Assessment



- Risk is defined as the possibility that an event will occur and adversely affect the achievement of objectives.
- Risk assessment involves a dynamic and iterative process for identifying and assessing risks to the achievement of objectives (operating, reporting, compliance).
- Risk assessment forms the basis for how risks will be managed.
- Risk assessment also requires management to consider the impact of possible changes in the external environment and within its own business model that may render internal controls ineffective.

Risk Assessment for Grants Administration



- 1. Perform and document a risk assessment of the entity's grants management processes;
- 2. Utilize a comprehensive internal control questionnaire to facilitate risk analysis;
- 3. Consider the level of program risk (high, medium, low) when establishing control activities;
- 4. Perform a cost/benefit analysis prior to installing a new control activity;
- 5. Consider the possibility and likelihood of fraud in the entity's grants management process; and
- 6. Identify and assess changes in the regulatory, technology, personnel, and operating environment under which the grants are managed.







- Control activities are the **actions** established through policies and procedures that help ensure that management's directives to mitigate risks to the achievement of objectives are carried out.
- Control activities are performed at all levels of the entity, at various stages within the business processes, and over the technology environment.



Elements of Effective Internal Controls

- 1. Written policies and procedures
- 2. Segregation of incompatible duties (custody, authorization, recording, reconciling)
- 3. Proper authorization
- 4. Compliance with laws and regulations
- 5. Complete and accurate documentation
- 6. Management reviews and reconciliations
- 7. Analytical reviews
- 8. Safeguarding of assets
- 9. Accuracy and efficiency in recording and processing transactions
- 10. Reporting and monitoring





Control Activities for Grants Administration



- 1. Document both government-wide and individual grant policies;
- 2. Document both government-wide and individual grant procedures;
- 3. Develop a timeline and process for **updating policies and procedures** as changes occur;
- **4. Ensure that staff are knowledgeable** of and adhere to federal, state, and local laws and regulations and the specific requirements of the grant and Uniform Guidance;
- Establish control activities to ensure the reliability of information obtained from third parties (contractors, subrecipients, beneficiaries);
- 6. Develop comprehensive information technology policies and procedures;



Control Activities for Grants Administration



- 7. Ensure that information technology policies and procedures are **reviewed** at least annually;
- 8. Become knowledgeable of and implement, as necessary, federal and state standards for financial management systems;
- 9. Utilize financial management systems to support **compliance** with grant-related legal and regulatory requirements;
- 10. Become knowledgeable of and implement, as necessary, federal and state standards for **procurement**; and
- 11. Utilize federal, state, and local governments' official **debarment lists** to update the government's list of contractors.



Procuring	Procurement Method	LA Public Bid Law R.S. 38:2211 et seq	LA Procurement Code R.S. 39:1551 et seq	Federal 2 CFR 200:317 et seq	
	Direct purchase	\$29,999 or less	\$10,000 or less	Less than \$10,000 (micro-purchase)	
Goods (materials and supplies)	Obtain at least 3 documented quotes	Between \$30,000 and \$60,000	\$10,000 to \$20,000: 3 documented quotes; \$20,000 - \$30,000: 5 documented quotes	Between \$10,000 and \$249,999 (small purchase)	
	Advertise and bid publicly	At least \$60,001	Greater than \$30,000	\$250,000 or more (simplified acquisition threshold)	
	Direct purchase	\$250,000 or less	\$250,000 or less	Less than \$10,000 (micro-purchase)	
Public works	Obtain at least 3 documented quotes	N/A	N/A	Between \$10,000 and \$249,999 (small purchase)	
(construction)	Advertise and bid publicly	Greater than \$250,000	Greater than \$250,000	\$250,000 or more (simplified acquisition threshold)	
	Direct purchase		\$10,000 or less	Less than \$10,000 (micro-purchase)	
Professional services	Obtain at least 3 documented quotes	Exempt	\$10,000 to \$20,000: 3 documented quotes; \$20,000 - \$30,000: 5 documented quotes	Between \$10,000 and \$249,999 (small purchase)	
	Advertise and bid publicly		Greater than \$30,000	\$250,000 or more (simplified acquisition threshold)	

Information and Communication

- Management obtains or generates and uses relevant and quality information from both internal and external sources to support the functioning of other components of internal control.
- Communication is the continual iterative process of providing, sharing, and obtaining necessary information, both internally within an organization and externally to outside parties.





Information and Communication for Grants Administration



- 1. **Document** in a format accessible to stakeholders the purpose and the government's responsibilities for each of its grants;
- 2. Distinguish grants by **source** (federal, state, local, and private entity);
- 3. Identify **time periods** required by grants;
- 4. Identify grant **reporting requirements**;
- 5. Identify grants that require specialized administration;



Information and Communication for Grants Administration



- 6. Ensure that grant requirements are documented in **contractor communication**;
- 7. Ensure that grant **information** is available to internal stakeholders;
- 8. Develop **ongoing communication** and knowledge of grantors, passthrough organizations and subrecipients, including confirmation of the nature of the relationship (contractor or subrecipient);
- 9. Develop an ongoing dialog with financial statement, Single Audit, and program auditors concerning **grant reporting and compliance**; and
- 10. Develop processes to ensure that **quality**, **supportable information** is utilized in grant decision making.



STEP 1: Determine if the Transferee is a Vendor or Subrecipient

NO		Vendor	Sub recipient
1	Are funds provided to transferee in advance of any expenditure?	No 🔘	Yes 🔵
2	Are funds being transferred in return for receipt of goods or services?	Yes 🔵	No 🔘
3	Does the transferee provide the goods or services within its normal business operations?	Yes 🔵	No 🔘
4	Does the transferee provide the same or similar goods or services commercially to others?	Yes 🔵	No 🔘
5	Are actual costs (including indirect charges) reimbursed?	No 🔘	Yes 🔵
6	Does transferee have authority to make programmatic decisions (i.e. decide which activities and services are provided)?	No 🔘	Yes 🔵
7	Is the entity a political subdivision or was it created by one?	No 🔘	Yes 🔵
8	Are the goods or services implicit/essential to the Federal/State program?	No 🔘	Yes 🔘
9	Is the transferee a political subdivision with no profit motive?	No O	Yes 🔵
10	Is on-site monitoring performed by the transferor?	No 🔘	Yes 🔵
11	Is the transferee required to provide matching funds?	No 🔵	Yes 🔵

Vendor/Quasi-Public Decision Tree

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Monitoring Activities

- Ongoing evaluations, separate evaluations, or some combination of the two are used to ascertain whether the components of internal control are present and functioning.
- Ongoing evaluations, built into business processes at different levels of the entity, provide timely information.
- To the extent control deficiencies are found they are communicated in a timely manner to responsible parties, including senior management and the governing body for corrective action.





Monitoring Activities for Grants Administration



- 1. Develop a process of ongoing (daily, weekly) and periodic (quarterly, annually) **programmatic control activities** that ensures compliance with laws and regulations;
- 2. Provide an annual periodic review of the **risk assessment** process;
- Ensure that program deficiencies are communicated to all responsible parties, including management and the governing body; and
- 4. Ensure that **corrective action plans** addressing the control deficiencies are written, identify responsible parties and timelines, and are implemented in a timely manner.

Limitations of Internal Control

- Consideration of cost will prevent management from ever installing a "perfect" system
- Reality that human judgment in decision making can be faulty and subject to bias
- Breakdowns that can occur because of human failures such as simple errors
- Ability of management to override internal control
- Ability of management, other personnel, and/or third parties to circumvent controls through collusion
- External events beyond the organization's control



GFOA Best Practice: SEFA Preparation



- Governments that are subject to the Single Audit Act are required to prepare and have audited a Schedule of Expenditures of Federal Awards (SEFA).
- Uniform Guidance requires that the independent auditor performing a Single Audit render an in-relation-to opinion on the SEFA as part of the independent auditor's report on the government's financial statements.
- GFOA recommends that governments that are subject to the Single Audit Act implement procedures to ensure an accurate and complete SEFA.



GFOA Best Practice: SEFA Preparation



- A. Governments should create a **repository** (**electronic file**) **of relevant grant information** that is accessible to the preparers of the SEFA and those who administer the grants. At a minimum, the repository should contain the following for each federal grant:
 - 1. Grant agreement and notice of award,
 - 2. Type of grant (reimbursement basis or structured payments),
 - 3. Program name and cluster title,
 - 4. Name of federal funding agency,
 - 5. Pass-through entity,
 - 6. Assistance listing number,



GFOA Best Practice: SEFA Preparation



- A. Governments should create a **repository** (**electronic file**) **of relevant grant information** that is accessible to the preparers of the SEFA and those who administer the grants. At a minimum, the repository should contain the following for each federal grant (continued):
 - 7. Pass-through entity identifying number,
 - 8. Amount passed through to each subrecipient,
 - 9. Award amount,
 - 10.Award date,
 - 11. Match requirement, and
 - 12. Period of performance.



GFOA Best Practice: SEFA Preparation



- B. The SEFA should be prepared on the same **basis of** accounting as the financial statements:
 - 1. In order to facilitate timely and accurate preparation of the SEFA for fiscal year end, a **monthly reconciliation** of expenditures in the general ledger should be performed;
 - 2. Governments should include **grant-specific coding** in their charts of accounts in order to identify eligible expenditures;
 - 3. Governments should review grants included in the **previous year's SEFA** to determine if they should be included in the current year SEFA;



GFOA Best Practice: SEFA Preparation



- B. The SEFA should be prepared on the same **basis of accounting** as the financial statements (continued):
 - 4. In situations where expenditures reported in the SEFA are not the same as expenditures reported in the general ledger (due to outstanding loan balances, timing of grant awards, expenditures incurred in a prior period, etc.) a reconciliation should be included in the **notes** to the SEFA; and
 - 5. Governments should ensure that the **Single Audit** is submitted to the Federal Audit Clearinghouse in accordance with federal guidelines.



U.S. DEPT. OF HEALTH AND HUMAN SERVICES

Summer Food Service Program for Children

TOTAL DEPT. OF AGRICULTURE

Fresh Fruit and Vegetables

Child and Adult Care Food Program

PROGRAM NAME	FEDERAL ASSISTANCE LISTING NUMBER	GRANTOR PROJECT NUMBER	EXPENDITURES	TOTALS BY ASSISTANCE LISTING NUMBER	AMOUNTS PROVIDED TO SUBRECIPIENTS
LDH Covid-19 Testing	93.323	N/A	\$ 238,730 \$	238,730	116,000
PDG Contract	93.434	N/A	55,750		
B-3 Seats PDG	93.434	28-21-B3SP-17	377,833		_
Ready Start Preschool Development	94.434	28-21-RSB5-17	66,130	499,713	
LA Healthy Schools	93.981	28-18-LHSC-17	8,607		
LA Healthy-Supplement	93.981	28-22-LHSS-17	8,888	17,495	-
Child Care and Development Fund (CCDF):					
Early Childhood Lead Agency Consolidated-CCDF	93.575 (3)	28-21-CO-17	236,577		-
Ready Start CCDF	93.575 (3)	28-21-RSCC-17	45,428		
B-3 Seats CRRSA	93.575 (3)	28-21-B3SC-17	1,292,700		-
COVID 19 CRRSA	93.575 (3)	28-21-CCRC-17	391,760		_
Ready Start CRRSA	93.575 (3)	28-21-RSNC-17	65,733		
Community Building and Access	93.575 (3)	28-21-SBEC-17	83,012	2,115,210	
TOTAL DEPT. OF HEALTH AND HUMAN SERVICES			2,871,148		\$ 116,000
U.S. DEPT. OF AGRICULTURE					
	FEDERAL ASSISTANCE LISTING	GRANTOR PROJECT		TOTALS BY ASSISTANCE	AMOUNTS PROVIDED TO
PROGRAM NAME NUMBER		NUMBER	EXPENDITURES	LISTING NUMBER	SUBRECIPIENTS
National School Breakfast Program	10.553 (6)	N/A	7,515,995		-
National School Lunch Program	10.555 (6)	N/A	17,927,524		-
Commodities Program	10.555 (6)	N/A	1,829,359		-

N/A

N/A

N/A

450,272

684,924

12,192,035

40,600,109

28,408,074

12,192,035

(continued)

10.559 (6)

10.582 (6)

10.558

H



Common Audit Findings Related to Grants

- Charging improper expenditures to grants
- Inaccurate grant budgets
- Incorrect amounts reported on the SEFA
- Lack of employee certifications
- Lack of review and approval of reimbursement requests before submission
- Lack of supporting documentation for expenditures (time charged to grant work, procurement documents, etc.)
- Inadequate written policies and procedures over federal funds
- Failure to follow eligibility requirements



Top 8 Effective Grants Management Core Competencies

1. Using management systems

Maintain an organizational structure for managing a grant that produces results, ensures coordination, and builds accountability.

2. Managing risk

➤ Understand what constitutes financial and program risk as it relates to a grant, and the ability to characterize a program according to risk assessment principles.

3. Understanding federal and non-federal requirements

➤ Understand all federal and/or non-federal requirements pertaining to a grant, including grant provisions, and take steps to ensure they are addressed.



Top 8 Effective Grants Management Core Competencies

4. Translating a proposal into a program plan and using it

➤ Create a program plan for implementing a grant and a process to track its progress.

5. Managing and administering sub-grants

> Develop a judicious, reasonable, and effective process for selecting and managing sub-grants.

6. Managing budget and finances

➤ Understand financial management principles and have a comprehensive system for organizing financial statements, managing and documenting costs, and ensuring internal controls.



Top 8 Effective Grants Management Core Competencies

7. Keeping records and documentation

>Understand documentation needs and requirements and meet them regularly.

8. Continuous review

Address prior programmatic and financial weaknesses, and continue to review a program's performance making mid-course corrections as needed.



OMB's Proposed Revisions to Guidance for Grants Agreements (2 CFR)

- Intended to reduce agency and recipient burden
- Both policy changes and clarifications to existing guidance including plain language revisions
- Update to reflect recent OMB priorities related to federal financial assistance
- Make the guidance more accessible and readily comprehensible
- Align with Transparency Act and DATA Act of 2014
- Accepting comments through December 4, 2023 (process started in February 2023)



OMB's Proposed Revisions to Guidance for Grants Agreements (2 CFR)

- Increase Single Audit threshold from \$750,000 to \$1 million
- Increase equipment threshold from \$5,000 to \$10,000
- Raise de minimis indirect cost rate from 10% to 15%
- Add state, municipal, or local entity recipient or subrecipient on the SEFA to increase transparency
- Approval to charge administrative costs specifically associated with the closeout of a federal award
- Revising Notice of Funding Opportunity (Appendix I)



Major Areas of Grants Administration

- 1. Administration and operation
- 2. Financial management
- 3. Support
- 4. Internal controls
- 5. Subrecipient monitoring
- 6. Continuous communications
- 7. Reporting requirements
- 8. Compliance with auditing requirements
- 9. Post-implementation review process





- 1. To ensure the **efficient administration and operation** of grant programs, the government should:
 - a. Maintain a process to **monitor for changes** in grant terms and conditions that occur after acceptance of a grant;
 - b. Establish a **project plan** identifying timelines and parties responsible for implementing the plan;





- 1. To ensure the **efficient administration and operation** of grant programs, the government should (continued):
 - c. Provide initial **training** for new and unfamiliar programs and continuing training for the government (both for oversight agencies, such as finance, and department/program staff that directly administer the grants) and others involved with the grant program (e.g., subrecipients); and
 - d. Maintain a process to address **specific personnel issues** related to grants (e.g., whether salaries and/or benefits are eligible expenditures and, if so, what are the related time-keeping requirements).





- 2. To ensure the **efficient financial management** of grants, governments should:
 - a. Establish a central grants management function;
 - Establish one or more grant funds or unique grant project identifiers to account for all financial transactions for each grant;
 - c. Develop appropriate cash management procedures for drawdown and receipt of funds as well as disbursement of funds;





- 2. To ensure the **efficient financial management** of grants, governments should (continued):
 - d. Develop procedures to **reconcile** internal records with federal and state reports;
 - e. Maintain a process to ensure that **costs charged to grants** are allowable, necessary and reasonable, and properly allocated, and that these determinations are made in a consistent manner;
 - f. Determine whether **indirect costs** will be allocated to grant programs, and if so, maintain an appropriate process to make the allocation;





- 2. To ensure the **efficient financial management** of grants, governments should (continued):
 - g. Determine if the government will use a negotiated rate or the *de minimis* **indirect cost rate**;
 - h. Maintain a process to track information about **local matching funds**, including identification of the source of such funds;
 - Integrate grants into the annual budget process;





- 2. To ensure the **efficient financial management** of grants, governments should (continued):
 - j. Integrate grants into the government's cash flow planning; and
 - k. Develop a **contingency plan** for funding services that will be continued even if the grant funding is reduced or terminated.







- 3. To **support** grants administration, governments should maintain systems that:
 - a. Ensure that systems will provide information to all involved parties to allow them to comply with both generally accepted accounting principles (GAAP) and grant requirements;
 - **b. Identify and segregate costs** as necessary for the grant (e.g., separate allowable and unallowable costs, separate direct costs from indirect costs, and separate administrative costs);





- 3. To **support** grants administration, governments should maintain systems that (continued):
 - c. Account for and track grant funded capital items;
 - d. Track information for non-cash grants; and
 - e. Store and provide information **electronically** so that it is available for multiple users.





- 4. To maintain proper **internal control procedures**, governments should:
 - a. Document grant procedures;
 - b. Maintain internal control procedures over accounting, financial reporting, and program administration;
 - Maintain internal control procedures over the identification of, and adherence to, federal and state compliance requirements, such as those relating to contracting;





- 4. To maintain proper **internal control procedures**, governments should (continued):
 - d. Consider the **level of program risk** (e.g., high, medium, low) when establishing internal control procedures; and
 - e. Design and use internal control procedures to ensure the reliability of information obtained from third parties.







- 5. To ensure proper **subrecipient monitoring**, governments should:
 - a. Establish requirements for subrecipients to submit progress reports;
 - b. Provide for **administrative monitoring**, including timely reporting and adherence to compliance requirements by subrecipients;
 - c. Provide for **financial monitoring**, including obtaining an understanding of, and adhering to, cost principles;





- 5. To ensure proper **subrecipient monitoring**, governments should (continued):
 - d. Provide for the receipt, review, and appropriate follow-up of **Single Audit reports**, when applicable; and
 - e. Develop **contacts with the state** for funds that pass through the state.







- 6. Establish **continuous communications** with:
 - a. The grant sponsor/provider;
 - b. Those with oversight responsibility including, when applicable, the Federal Cognizant Agency;
 - c. External financial statements and Single Audit providers; and
 - d. An interdisciplinary implementation task force within the government that meets regularly to discuss necessary program and control changes and how they should be implemented.





- 7. Establish processes to meet various specialized **reporting requirements** including:
 - a. Maintaining a comprehensive list of reporting requirements and a reminder system for meeting the reporting deadlines;
 - b. Identifying **who is responsible** for the various reporting requirements;
 - c. Establishing **methodologies** for the preparation of specialized reports;





- 7. Establish processes to meet various specialized reporting requirements including (continued):
 - d. Establishing **approval processes** for certifying specialized reporting; and
 - e. Establishing processes for obtaining all of the information needed for the Schedule of Expenditures of Federal Awards (**SEFA**).

Louisiana Department of Education

Welcome to the E-Grants Management System





- 8. Ensure **compliance** with auditing requirements for grants by
 - a. Developing and documenting an understanding of **audit** requirements specific to grants, including those in Generally Accepted Government Auditing Standards (GAGAS; Yellow Book), Generally Accepted Auditing Standards (GAAS), and Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance); and
 - b. Developing and documenting an understanding of audit requirements for **grant close-out**.





- 9. To identify and address potential program shortcomings, governments should establish a **post-implementation review** process that evaluates the program, answering questions such as
 - a. Whether or not the program achieved its goals, and
 - b. Were any process or internal control issues that were identified by staff, grantor, or auditors resolved?





Thank You!

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