HOW TO: FENAA and other SAI Updates



General Updates of State Auditor's Office





Why is the State Auditor's Office prescribing a chart of accounts?

Oklahoma Constitution - Article 6 § 19:

"The State Auditor and Inspector ... shall also prescribe a uniform system of bookkeeping for the use of all treasurers."





Chart of Accounts - How Does This Help Me?

- Standardized
- SOP for all circumstances
- Fund descriptions
- Budgeting
- Analyzing numbers





Chart of Accounts – How does this help me?

- Inventory tracking
- Jail expenditures
- Revenue declines/increases





Chart of Accounts – How does this help me?

- Financial Statement rolled up into budget
- Partial tracking of SEFA





Financial statements and bonds

• How do bond issues of authorities affect the timing of my county audit?





Financial statements and bonds

• At this time, which counties are affected?

Caddo	Okmulgee
Cleveland	Pawnee
Craig	Payne
Creek	Rogers
Delaware	Washita
Haskell	Woodward





Proposed monthly report of Sheriff's Revenues, expenditures, and balances





Incarceration Rate Worksheet



Presented by: Cheryl Wilson County Management Services



- New and improved form 240
 - More details as to what is being corrected.
 - Disbursements.
 - Apportionment/appropriations.
 - Financial Statement presentation.



OSAI Form # 240 (2019)		C (0111
	Transfer of Funds	County, Oklahoma
Error Correction Adjustment to Disbursements Adjustment to Revenue	 Temporary Transfer (68 O.S. § 3021) Emergency Transportation Revolving Fund L Residual Balance Transfer 	oan (69 O.S. § 687.3)
Error Correction		
Date Error Occurred (if applicable):		
Warrant number (if applicable):		
Miscellaneous Receipt Number (if applicable):		
Description of error or transfer:		
	Amount	
Transfer of funds from:		
	nsfers Out:	0.00
Transfer of funds to:		
Total Tr	ansfers In:	0.00
Total II	MARKAN AND	



✓ Error Correction	Temporary Transfer (68 O.S. § 3021)
Adjustment to Disbursements	Emergency Transportation Revolving Fund Loan (69 O.S. § 687.3)
Adjustment to Revenue	Residual Balance Transfer

Transfer of Funds

Error Correction

	Date Error Occurred (if applicable):	06/01/19
Warrant number (if applicable):	Warrant number (if applicable):	
Miscellaneous Receipt Number (if applicable):	Miscellaneous Receipt Number (if applicable):	

Description of error or transfer:

Accidentally appropriated commissary revenue to sheriff service fee because my super annoying co-worker was distracting me.

Amount

M·A

ECTOR

Amount
5,000.00
5,000.00
5,000.00
5,000.00

Form 240 Error Correction

- Example: Resale property maintenance.
 - Highway department mowed some resale properties and removed debris from the yard.
 - Highway district will prepare an itemized list of the properties cleaned and mowed and the associated costs.



OSAI Form # 240 (2019)

Pottawatomie County, Oklahoma

Error Correction	Temporary Transfer (68 O.S. § 3021)
🖌 Adjustment to Disbursements	Emergency Transportation Revolving Fund Loan (69 O.S. § 687.3)
Adjustment to Revenue	Residual Balance Transfer

Transfer of Funds

Error Correction

Date Error Occurred (if applicable): Warrant number (if applicable): Miscellaneous Receipt Number (if applicable): Description of error or transfer: July cleaning and mowing of resale properties by district 2. Itemization of costs is attached. Amount Transfer of funds from: Resale property fund 1,500.00 **Total Transfers Out:** 1,500.00 Transfer of funds to: Highway District 2 M & O 500.00 Personnel Services 1,000.00 Total Transfers In: 1,500.00





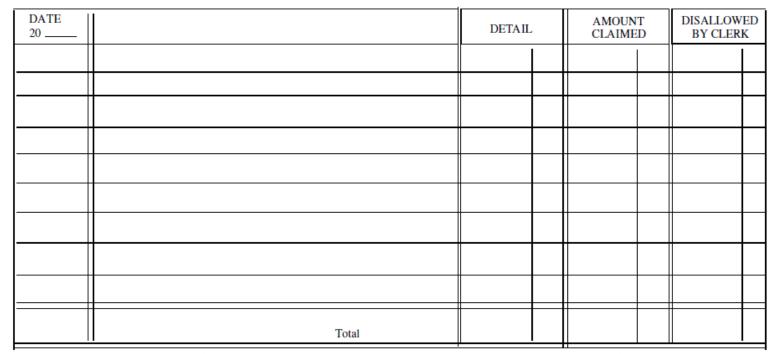
Old Form 270

CASH VOUCHER CLAIM

S.A.&I. 270 (2000)

COUNTY, OKLAHOMA

THE COUNTY TREASURER	Oklahoma.	20
In Account With	Oktaiona,	20
NAME	ADDRESS	



The County Clerk Is hereby authorized to mail Voucher issued in payment of this Claim to Claimant at address hereinabove stated.

I, the undersigned, upon oath, do depose and say that I have full knowledge of the above and foregoing account; that the said account is just, correct, due and according to law; that the amount claimed, after allowing all just credits, is now due and wholly unpaid; and that I am authorized to make this affidavit, so help me God.

Subscribed and sworn to before me this

Claimant.

day of _____ 20 ____

County Clerk

CLERK'S APPROVAL AUDITED AND APPROVED FOR - - \$

Cash Voucher Claims

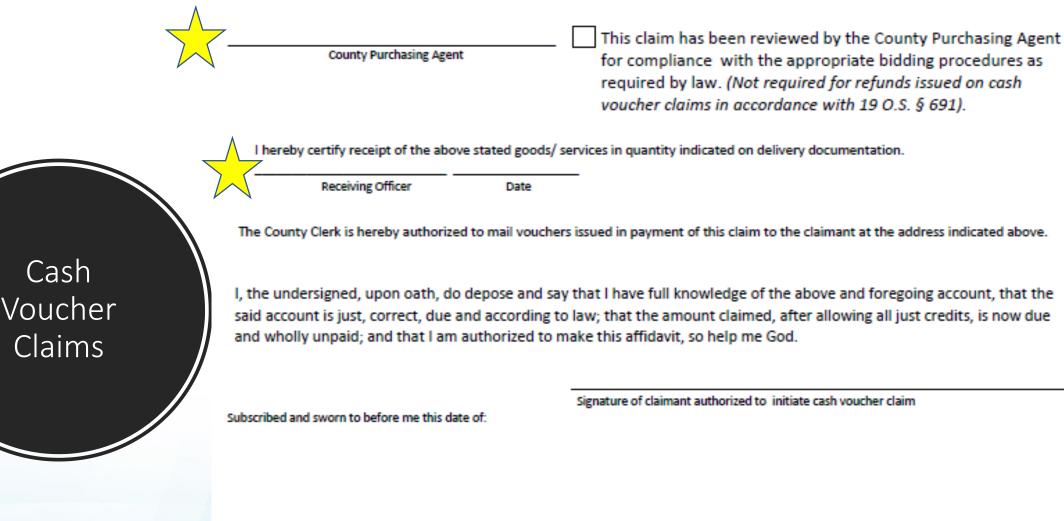
MA
M·A
PECTOR

New and improved form 270

	OSAI Form 270 (2019) 19 O.S. §§ 691 & 693	Cash Voucher Claim	Clair	m #	
	Office or Department: In account with:	County, Oklahoma	Vouche Fun Acc Da	d #	
Cash Voucher Claims	Address:	Description	A	mount Claimed	Disallowed
			Totals:	\$ 0.00	



New and improved form 270 (continued)



County Clerk: _____ Audited and approved for _____

By Deputy:_

NOTICE: This form is to be used in making claims for those accounts specifically authorized as a cash voucher account, not subject to Board of County Commissioners' Approval.

Cash Voucher Claims

- What funds use cash voucher claims?
 - Resale.
 - Law Library.
 - Drug Court.
 - Court Clerk Records Management and Preservation.
- Can't we just make them all cash voucher accounts?

NO



Court Clerk Records Management and Preservation

- Effective November 1, 2019 until November 1, 2023 a ten dollar fee will be collected on civil cases.
- The Court Clerk is required to keep an accurate accounting of this fund.
 - Prepare a monthly report of the funds collected and expended including the nature of each expenditure.
 - File the monthly report with the Board of County Commissioners and the Administrative Director of the Courts.



Court Clerk RM&P

- Trust and Agency fund #7210
 - ➢Not subject to purchase order process.
 - ➤Cash voucher claims will be initiated in the court clerk's office.
 - Filed with the county clerk who prepares the cash voucher.
 - Cash voucher is registered with the treasurer.
 - Payment is transmitted to the vendor.



Documentary Stamps

Changes to the DOC Stamp statute:

- Revenue diverted back to a county governmental purpose as it was originally intended.
- Still remitted to the Oklahoma Tax Commission in the same amount, it just has a different final destination than before the effective date SB 3372 (July 1, 2019).
- The main change at the county level was the removal of the words "general fund" referring to the 5% designated to cover the administration cost.

The county clerks shall retain five percent (5%) of all monies collected for such stamps as their cost of administration and shall pay the same into the county general fund.



Resources

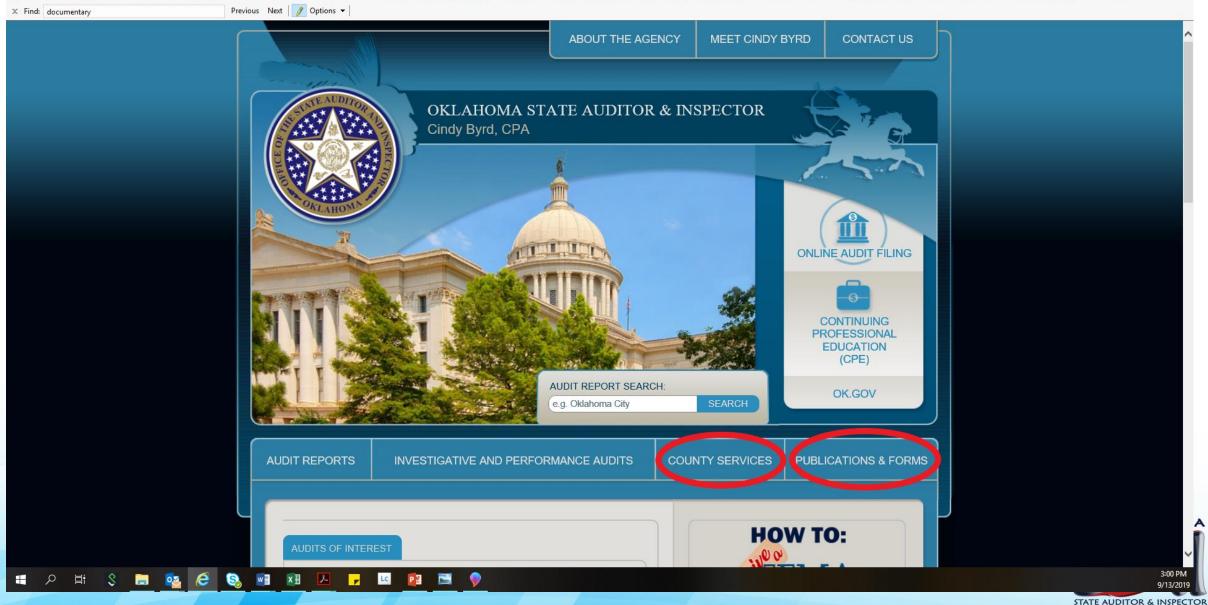
- <u>https://www.sai.ok.gov/</u>
 - Bulletins.
 - Forms.
 - SEFA resources.
 - Financial statement template.
 - Audits.
 - Current Chart of Accounts/Standard Operating Procedures.



← → 🧟 https://www.sai.ok.gov/	5 O 🔒 👻	Search P- 价 ☆ 戀	
🤗 Oklahoma State Auditor & I 🗴 📑			

File Edit View Favorites Tools Help

🚕 🤣 Norman, OK 📓 Welcome to Oklahoma's ... 🚳 Oklahoma State Auditor ... 🦉 Title 19 🧕 Statutes Citationized 💪 Google 🤜 http--www.ecapitol.net- 🚺 Bing 🗿 Oracle PeopleSoft Enterpr... 🥥 OMES 🐠 Mesonet Local Condition... 🛞 Oklahoma Department of ... 🦉 OSCN The Oklahoma Sup... 🛃 Road Conditions



Resources: http://www.agecon.okstate.edu/ctp/

to Oklahoma's ... 🚳 Oklahoma State Auditor ... 🧃 Title 19 🧃 Statutes Citationized 💪 Google 🔜 http--www.ecapitol.net- 🕟 Bing 🚑 Oracle PeopleSoft Enterpr... 🥥 OMES 🐠 Mesonet Local Condition... 🏐 Oklahoma Department of ... 🦉 OSCN The Oklahoma Sup... 🧃 Rc

-	boards, help create published	
Duties and	materials, and sometimes participate	
Responsibilities	directly in instruction.	
Certification Guidelines		Sept. 27, 2019
County Treasurers	The County Training Program benefits	
Duties and	from the oversight and direction	(6 hours)
Responsibilities	provided by the Commission on	
Certification Guidelines	County Government Personnel	Oct. 1, 2019
County Assessors	Education and Training mandated in	-
Certification Guidelines	the Oklahoma State Statutes.	hours)
CLEET Accreditation	Commission members consist of the	class is full
Handbooks	President of OSU, the State Auditor	
Related Publications	and Inspector, the President of the	OCt. 2, 2019
Resources	County Officers and Deputies	Purchasing Procedures 2 (6
Links	Association, the Director of the	hours)
Program Contributors	Department of Transportation, and	class is full
Rural Development	the Chairman of the Tax Commission.	
		Oct. 2, 2019
	Certification programs have been	Court Clerk New Officer or
	established for each elected office.	Refresher Course
	Certification programs range from	
	three-level programs for County	Oct. 10, 2019
	Commissioners, County Clerks, and	Overview of County
	County Treasurers to a single level of	Government (6 hours)
	certification for Court Clerks. County	

STATE AUDITOR & INSPECTOR

The End

Questions?



What is a SEFA?

• <u>Schedule of Expenditures of Federal Awards</u>



What authority makes Counties Responsible for the Schedule of Expenditures of Federal Awards?

§200.510(b) states in part:

"The auditee (THE COUNTY) must also prepare a schedule of expenditures of Federal awards for the period covered by the auditee's financial statements which must also include the total Federal awards expended as determined in accordance with §200.502 - Basis for determining Federal awards expended."



Recipients must:

- 1. Keep track of all funds received and expended.
- 2. Ensure internal controls are in place with county staff.
- 3. Maintain compliance with provisions of contracts & grants.
- 4. Prepare financial statements & SEFA.



OSAI has a deadline of August 31st for receiving the SEFA.

Why is the deadline important? Why do we care?

Federal requirementsOSAI has to plan audits



What is reported on the SEFA?

All federal awards awarded to the County.
CFDA numbers.
All receipts.
All expenditures.
Balances of federal awards.

NOTE: Record FEDERAL amounts only.



Examples of Federal Grants

- FEMA
- CDBG
- Payments in Lieu of Taxes
- Flood Control
- Law Enforcement Block Grants
- Violence Against Women
- BIA



Who is responsible for completing the SEFA?

➤The person designated by the Board of County Commissioners.



Responsibilities

COUNTY:	STATE AUDITOR:
Keep accurate records	Perform timely audits
Prepare financial statements	Help counties with compliance
Assist SAI with audit steps	Submit audit to Feds



Most Important Elements of The SEFA

All required elements of the SEFA can be found in the Code of Federal Regulations at:

Title 2, Subtitle A, Chapter II, Part 200



The Federal Office of Management and Budget is always changing something!





The Federal Office of Management and Budget has issued:

The Uniform Grant Guidance (UGG)

Effective for the County's fiscal year audits for July 1 through June 30, 2019 and future periods.



What has changed?

• The threshold for an audit of federal funds is \$750,000.

Previously this amount was \$500,000.



What has changed?

 Bigger emphasis placed on Internal Controls and reporting deficiencies.

 Requires the County to formally respond to the findings issued in the prior report and write a formal corrective action plan on how the findings will be corrected.



What has changed?

 Requires the grantor agency to perform more detailed monitoring.

Grantor agencies for Counties include
 Oklahoma Emergency Management,
 Department of Commerce, Bureau of
 Indian Affairs.



What has changed?

 The compliance requirements related to many grant programs has changed.

 The County will be responsible for knowing what applies and designing internal controls to ensure compliance.



Where can you find the guidance?

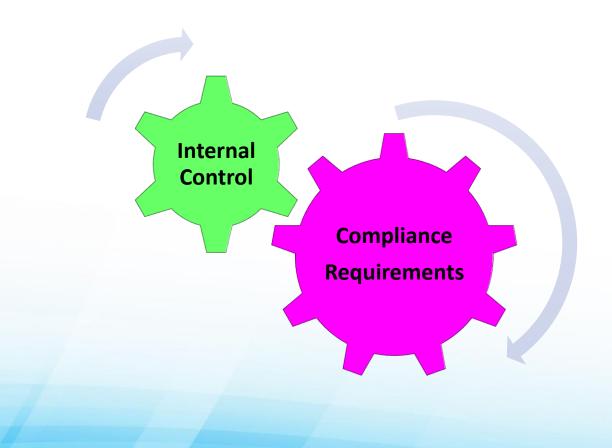
o Title 2, Subtitle A, Chapter II, Part 200

• Compliance Supplement for each fiscal year.

SEE HANDOUT (Matrix & Compliance Supplement)



There are two separate criteria associated with utilizing federal grant funds:





Federal Programs – Internal Control

The UGG states that nonfederal entities (Counties) must establish and maintain effective internal control over the federal award that provides reasonable assurance that the nonfederal entity is managing the federal award in compliance with:

- Federal statutes
- Regulations
- Terms and conditions of the federal award



Federal Programs – Internal Control

Internal control over Federal programs means a process effected by an entity's management and other personnel designed to provide reasonable assurance regarding the achievement of the following objectives for Federal programs:

- a) Transactions are properly recorded and accounted for;
- b) Transactions are executed in compliance with laws, regulations, and grant requirements.



Federal Programs – Compliance Requirements

- Specific requirements outlined in the grant document.
- Compliance requirements applicable to all grants:
 - Activities Allowed
 - Allowable Costs
 - Matching



Federal Programs – Compliance Requirements

How do you know what requirements apply to your grant?

- Grant Agreement (FEMA PW, CDBG Grant)
- https://beta.sam.gov/ (formerly <u>https://www.cfda.gov/</u>)



Federal Programs – Compliance Requirements

How do you know what the requirements apply to your grant?

- OMB Federal Compliance Supplement
- Website: <u>https://www.whitehouse.gov/omb/management/ment/office-federal-financial-management/</u>



Federal Programs

Compliance Requirements

How do you know what the requirements apply to your grant?

Grant Agreement (FEMA PW, CDBG Grant)

OMB Federal Compliance Supplement



Now that we've become familiar with the SEFA, let's discuss FEMA...



Federal Emergency Management Agency

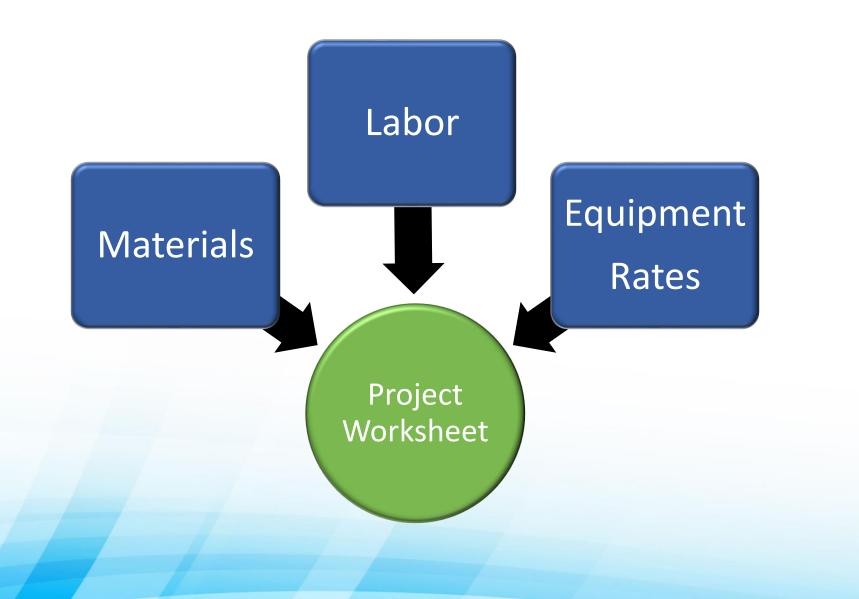
Why is FEMA reporting so difficult?

 Reporting FEMA expenditures is much more than completing documentation for each project worksheet....





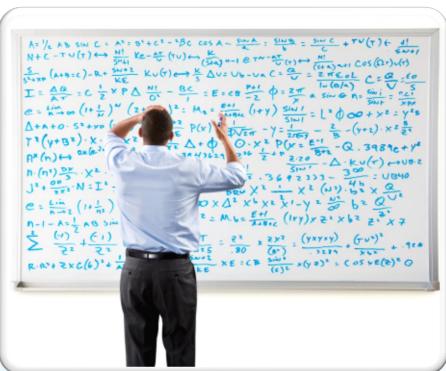
Documentation for PWs:





The Problem...

- More than one disaster, & many project worksheets (PW) for each disaster.
- Each District/Officer maintains information for the PW.
- The County Officers have not designated one person to compile the SEFA.





ORGANIZATION is the KEY!

1. Maintain ledgers for each disaster declared.

• This can be done by each office!

2. On June 30, review ledgers and compile all expenditures for that fiscal year.



• The SEFA covers July 1 to June 30

• FEMA projects cover several months

• Project worksheets from all Highway Districts must be compiled and put on one schedule.



More Helpful Tips...

- 1. Utilize the ledger templates provided by OSAI.
- 2. Keep the ledgers up-to-date.
- 3. If you have questions, call OSAI for technical assistance.



Let's Get Started.....



Project Worksheet:

- What type of project?
 - Large project
 - ➢ Prior to September 30, 2019 − \$128,900 and over
 - ≻After September 30, 2019 to be determined
 - Small project
 - Prior to September 30, 2019 under \$128,900
 - ≻After September 30, 2019 to be determined



Project Worksheet:

- What is the difference between large and small project requirements?
 - > Large projects are funded on actual documented costs.
 - For small projects, if the project is completed for less than the award the county is allowed to use the excess for other projects.



Project Worksheet:

- What category of work?
- How do I get started?



FEMA CATEGORIES AND EXAMPLES OF COMMON ELIGIBLE WORK

Α	В	С	D	E	F	G
Debris Removal	Emergency Protective Measures	Roads & Bridges	Water Control Facilities	Buildings & Equipment	Utilities	Parks, Recreation, & Other
Debris removal must be in the public interest and necessary to: • Eliminate immediate threats to lives, public health & safety; • Eliminate immediate threats of significant damage to improved public or private property Trees and Woody Debris Building Components Sand, Mud, Silt, & Gravel Removal of Temporary Levees	Search & Rescue Security Emergency Pumping Sandbagging Detour & Warning Signs EOC Activation Emergency & Temporary Repairs Overhead Power Lines Emergency Medical Facilities Emergency Evacuations Activities undertaken before, during and following a disaster to save lives, protect improved property	Roads Surfaces Bases Shoulders Ditches Drainage Structures Low Water Crossings Bridges Decking & Pavement Piers Girders Abutments Slope Protection Approaches Slope Failures	Dams and Reservoirs Levees Engineered drainage Channels Canals Aqueducts Sediment Basins Shore Protective Devices Irrigation Facilities Pumping Facilities	Buildings Structural Components Interior Systems • Electrical • Mechanical • Contents	Water Treatment Plants Power Generation & Distribution Facilities • Natural Gas Systems • Wind Turbines • Generators • Substations • Power Lines	Playground Equipment Swimming Pools Bath Houses Tennis courts Boat Docks Piers Picnic Tables Golf Courses Fish Hatcheries Mass Transit Facilities

Materials:

- Stock piles and inventory cards at barns
- Purchases from 6-month bids
- Items delivered directly to job site
- Requires good documentation



Labor:

How do I report time?



Labor:

Regular Employee (Full-Time, Part-Time, Seasonal)							
Type of Work	Category	Is Straight-Time Costs Allowed	Is Overtime Costs Allowed				
Emergency - Debris removal	А	No	Yes				
Emergency - Emergency Protective measures	В	No	Yes				
Permanent - Roads/bridges	С	Yes	Yes				
Permanent - Water control facilities	D	Yes	Yes				
Permanent - Buildings/equipment	Е	Yes	Yes				
Permanent - Utilities	F	Yes	Yes				
Permanent - Parks, recreational, & other facilities	G	Yes	Yes				



<u>Temporary</u> - Labor:

Temporary Employee (Hired to Perform Disaster Work)							
Type of Work	Category	Is Straight-Time Costs Allowed	Is Overtime Costs Allowed				
Emergency - Debris removal	А	Yes	Yes				
Emergency - Emergency Protective measures	В	Yes	Yes				
Permanent - Roads/bridges	С	Yes	Yes				
Permanent - Water control facilities	D	Yes	Yes				
Permanent - Buildings/equipment	E	Yes	Yes				
Permanent - Utilities	F	Yes	Yes				
Permanent - Parks, recreational, & other facilities	G	Yes	Yes				



Equipment:

Can the County be reimbursed for equipment usage?

YES!

- Print FEMA equipment rate schedule and keep it as a reference.
- Since I am not issuing a purchase order...how are these funds accounted for?



What are bidding requirements?

Follow your normal purchasing requirements.



How do I record expenditures that occurred prior to being awarded the Project worksheet?



Why are internal controls important and how can I meet this requirement?

Let's take a look at the forms!



Activities allowed or unallowed (A)

• The allowed activities for the PA program are for the approved project as described on the PW and supporting documentation. The approved project may be repair or replacement of the damaged facility, an improved project, or an alternate project

(44 CFR section 206.203).



Allowable costs/Cost principles (B)

1. Equipment Usage

- Schedule of Equipment Rates published by FEMA
- The PA program restricts eligible direct costs for applicant-owned equipment used to perform eligible work to reasonable rates that were established under State guidelines, or when the hourly rate exceeds \$75, rates may be determined on a case-by-case basis by FEMA.

(44 CFR section 206.228(a)(1)).



Allowable costs/Cost principles (B)

- *3. Force Account Labor Costs*
- The straight- or regular-time salaries and benefits of a county's permanently employed personnel are not eligible in calculating the cost of eligible work for emergency protective services or debris removal under Sections 403 and 407 of the Stafford Act (42 USC 5170b and 5173, respectively).
- For performance of eligible permanent restoration under Section 406 of the Stafford Act (42 USC 5172), straight-time salaries and benefits of a subrecipient's permanently employed personnel are eligible (44 CFR section 206.228(a)(2)).



Allowable costs/Cost principles (B)

4. Insurance and Other Recoveries

• Auditors are advised that there are likely to be amounts from insurance settlements, salvage, or other sources that must be considered in determining allowable costs because allowable costs must be net of applicable credits (42 USC 5155).



Matching (G)

Costs must be on a shared basis, as specified in the FEMA-State Agreement.

In general, the minimum Federal share is 75 percent of eligible costs (44 CFR section 206.65).

The non-Federal share that is split between the State and each subrecipient may vary.

The accountability for meeting the matching requirement resides with the State and is determined at the time of project accounting as part of project closeout (i.e., the non-Federal share does not have to be met until the end of the project).



Period of Performance (H)

Federal awards may specify a time period during which the non-Federal entity may use the Federal funds. Where a funding period is specified, a non-Federal entity may charge to the award only costs resulting from obligations incurred during the funding period and any pre-award costs authorized by the Federal awarding agency.



Reporting (L)

Refer to requirements for reporting mandated by Oklahoma Emergency Management.

REMEMBER! There are more stringent reporting requirements for large project worksheets vs. small project worksheets.



Subrecipient Monitoring (M)

Generally not applicable for county government.



Special tests and provisions (N)

Project Accounting

- For large projects, the State is required to make an accounting to FEMA of eligible costs.
- Similarly, the subrecipient must make an accounting to the State.
- In submitting the accounting, the entity is required to certify that reported costs were incurred in performance of eligible work, that the approved work was completed, that the project is in compliance with the provisions of the FEMA-State Agreement, and that payments for that project were made in accordance with the applicable payment provisions.





New Forms

- <u>https://www.sai.ok.gov/county_services/</u>
- Then select 'SEFA Resources' tab









QUESTIONS?

For a copy of this presentation, please email <u>bspencer@sai.ok.gov</u>





WHAAAA?!?!



New Change to FEMA Reporting:

If the County incurs expenditures in 2019 but FEMA does not award the Project Worksheet until 2020 – The County should report the expenditures incurred in 2019 and 2020 on the 2020 SEFA.

Also...a footnote should be included that states how much of the total expenditures were incurred in 2019.



QUIZ

What is the new dollar threshold for requiring a Federal Single Audit?

\$750,000 in County-Wide federal expenditures.





When did this new guidance – the UGG – take effect?

July 1, 2015



QUIZ

Who should approve all grant awards?

The Board of County Commissioners in an open meeting.





Where does the County find the grant requirements?

- Grant Agreement
- OMB Compliance Supplement



Where can I find the CFDA number for my grant?

- 1. Grant documents
- 2. https://beta.sam.gov/

(formerly <u>https://www.cfda.gov/</u>)



QUIZ

If I expended funds in May 2019, but FEMA did not award my project worksheet until 2020 – which year should I report the expenditures on the County's SEFA?

The expenditures should be reported on the County's 2020 SEFA with a note reflecting how much was spent in 2019.

