# APPENDIX V LIST OF CHANGES FOR THE 2016 COMPLIANCE SUPPLEMENT

This Appendix provides a list of changes from the 2015 Compliance Supplement, dated June 2015.

### Global

- Because all audits using the 2016 Supplement will be performed under 2 CFR part 200, subpart F, i.e., audits of entity fiscal years beginning on or after December 26, 2014, the 2016 Supplement has removed references to OMB Circular A-133 that in 2015 were shown as dual references to A-133 and 2 CFR part 200. In some cases, e.g., in Part 3.1, certain references to OMB Circular A-133 have been retained because they include information that does not pertain specifically to the audit. These references have been footnoted where they occur.
- All parts and appendices were reviewed for use of the words "should" and "must," both for consistency in usage and clarity of intent, and changes made, as appropriate. Also see Parts 1 and 3 below.
- In order to assist auditors in using Part 2 in conjunction with the program/cluster supplements in Parts 4 and 5, each program/cluster now includes the applicable row from Part 2. In addition, the **bold** introductory wording under III, "Compliance Requirements," has been changed to indicate how the program/cluster supplement is to be used. This includes changing "should" to "must" concerning auditor use of the requirements specified in program/cluster supplements. As part of making this change, the **bold** introductory language has been removed from the BIA/BIE (15.000), DOT (20.000), and ED (84.000) Cross-Cutting sections because it is redundant and there is no corresponding row in the matrix in Part 2.

## **Table of Contents**

- The Table of Contents has been changed to:
  - Modify the program titles for the following programs in Part 4 to make them consistent with the names as they appear in the *Catalog of Federal Domestic Assistance* (CFDA):

CFDA 14.231 - Emergency Solutions Grant Program

CFDA 17.258 - WIA/WIOA Adult Program

CFDA 17.259 - WIA/WIOA Youth Activities

CFDA 17.278 - WIA/WIOA Dislocated Worker Formula Grants.

- Add to Part 4 CFDA 14.225 Community Development Block Grants/ Special Purpose Grants/Insular Areas to form a cluster with CFDA 14.218, Community Development Block Grants/Entitlement Grants.
- Add to Part 4 CFDA 14.272 National Disaster Resilience Competition (CDBG-NDR) to form a cluster with CFDA 14.269, Hurricane Sandy Community Development Block Grant Disaster Recovery Grants (CDBG-DR).
- Delete from Part 4 CFDA 11.010 Community Trade Adjustment Assistance.
- o Delete from Part 4 CFDA 14.880 Family Unification Program (FUP).
- Delete from Part 4 the following American Recovery and Reinvestment Act (ARRA) programs based on their completion or the limited amount of funds still subject to audit:

CFDA 14.257 - Homelessness Prevention and Rapid Re-Housing Program (HPRP) (Recovery Act Funded)

CFDA 81.128, Energy Efficiency and Conservation Block Grant Program

CFDA 84.388 - School Improvement Grants, Recovery Act

- Update the title of Appendix III
- Update the title of Appendix V
- o Update the title of Appendix VIII based on the changes in that appendix.

# Part 1 - Background, Purpose, and Applicability

- Updated to clarify the use of "should" and "must" in the Supplement.
- Updated to reflect the use of the Internet Data Entry System (IDES) for submission of audits to the Federal Audit Clearinghouse.
- Updated for the effective date of the Supplement and changes in the titles or contents of different parts and appendices of the Supplement.
- Updated to reflect the changed approach in Part 6, "Internal Control."

## Part 2 - Matrix of Compliance Requirements

- Changed throughout to use "N," in lieu of a shaded cell, if a program normally does not have activity subject to this type of compliance requirement or the compliance requirement generally would not have a direct and material effect on the program. "D" and "K," which are reserved in their entirety, remain shaded. References below to the 2015 Supplement use the term "shaded."
- Modified the introductory language to Part 2 to reflect the change to "N" in lieu of shaded cells.
- Updated matrix to add and remove programs to make it consistent with the Table of Contents and Part 4.
- Updated matrix based on added and deleted compliance requirements in Part 4 program supplements, or to make corrections, as follows:
  - CFDAs 10.760 and 10.781 added an "N" in "Special Tests and Provisions" because shading was omitted in the 2015 Supplement
  - o CFDAs 10.766 and 10.780 added an "N" in "Special Tests and Provisions" because shading was omitted in the 2015 Supplement
  - CFDA 14.231 changed "Eligibility" from shaded to "Y" to correct an error
  - CFDA 14.241 changed "Procurement and Suspension and Debarment" from shaded to "Y" to correct an error
  - o CFDA 14.267 changed "Eligibility" from shaded to "Y" to correct an error
  - o CFDAs 14.269, 14.272 changed "Eligibility" from "Y" to "N" to correct an error
  - CFDA 14.872 changed "Matching, Level of Effort, Earmarking" from shaded to "Y" to correct an error
  - CFDA 14.873 changed "Procurement and Suspension and Debarment" from shaded to "Y" to correct an error, and changed "Subrecipient Monitoring" from shaded to "Y"
  - o CFDA 15.047 changed "Special Tests and Provisions" from "Y" to "N" to correct an error in the 2015 Supplement
  - o CFDAs 17.207, 17.801, and 17.804 changed "Eligibility" from shaded to "Y"
  - CFDA 81.041 changed "Special Tests and Provisions from "Y" to "N" as the period for expenditures using ARRA funding has ended

- CFDA 81.042 changed "Special Tests and Provisions" from "Y" to "N" as ARRA funding has been exhausted
- CFDA 84.126 changed "Special Tests and Provisions" from shaded to "Y" to correct an error in the 2015 Supplement
- CFDA 93.090 changed "Eligibility" from shaded to "Y" to correct an error in the 2015 Supplement
- CFDAs 93.224 and 93.527 changed "Special Tests and Provisions" from "Y" to "N" due to removal of that section from the program supplement
- o CFDA 93.600 changed "Special Tests and Provisions" from "Y" to "N" as a correction to what was shown in the 2015 Supplement, i.e., the Wage Rate requirements are not required to be audited under this program.
- Changed entries under USDA for clarity as follows:
  - o 10.000 moved the endnote, which applied only to 10.000, to the entry for 10.000
  - o CFDAs 10.551 and 10.561 under "Eligibility," changed "See Part 4" to "N," as Part 4 indicates that auditors are not required to test eligibility.

## Part 3 - Compliance Requirements

- Revised "Introduction" to, among other things, update the date of the Frequently Asked Questions (FAQs), and modified the contents of the table showing the applicability of 2 CFR part 200.
- Revised the section on "Relationship between Frequently Asked Questions and the 2 CFR Part 200, Subpart F, Audit" to indicate the effect of FAQs that may be published after the issuance of the 2016 Supplement.
- Added in the "Introduction" a new section on use of the terms "should," "must," and "should not" in this part.
- Added "Note" indicating references to audit requirements now refer only to 2 CFR part 200, subpart F.
- In 3.1,
  - Provided explanatory material for the allowable costs of audit because provisions tied to OMB Circular A-133 were rescinded with the issuance of 2 CFR part 200 and replaced by different coverage.

- o In I, "Procurement and Suspension and Debarment," updated references to the System for Award Management's Exclusions.
- o In I, "Procurement and Suspension and Debarment," added language to the note regarding the simplified acquisition threshold (SAT) about the effect on non-Federal entities who are delaying implementation of the procurement standards in 2 CFR part 200.
- o In L, "Reporting," removed note about transition to standard progress reporting and added language concerning the Department of Health and Human Services' (HHS) transition from pooled payment to award-by-award payment requests.
- o In M, "Subrecipient Monitoring," updated references to 2 CFR part 200, removed references to separate identification of ARRA funding in the Schedule of Expenditures of Federal Awards, and removed outdated language.

## • In 3.2,

- o In B, "Allowable Costs/Cost Principles," corrected or clarified language.
- In B, "Allowable Costs/Cost Principles," changed language to reflect the current requirements and process related to submission of the DS-2 by institutions of higher education and the role of the cognizant agency for indirect costs.
- o In I, "Procurement and Suspension and Debarment," removed Federal Acquisition Regulation (FAR) citations that apply to Federal agencies rather than contractors, and updated FAQ on grace period for procurement.
- o In I, "Procurement and Suspension and Debarment," added a link to the FAR location where the current micro-purchase and simplified acquisition thresholds may be found. As of October 1, 2015, the micro-purchase threshold is \$3,500, while the SAT remains at \$150,000.
- o In L, "Reporting," added language concerning HHS' transition from pooled payment to award-by-award payment requests.

## Part 4 - Agency Program Requirements

- In addition to any changes noted in the Table of Contents (program additions, deletions, and name changes or corrections), changes discussed above as "global changes," and the changes listed for individual programs/clusters below, the following change was made in Part 4:
  - o In a number of program supplements, replaced bullets with letters or numbers in I, "Program Objectives," and "II, "Program Procedures," to provide for more consistent formatting.
- CFDAs 10.551 and 10.561 Updated II, "Program Procedures," including changes to conform to the changes in Appendix VIII of the Supplement (as described below), and III.G.1, "Matching, Level of Effort, Earmarking Matching." Updated website in III.N.1, "Special Tests and Provisions ADP System for SNAP." Deleted IV, "Other Information," as all ARRA funds have been spent.
- **CFDAs 10.553, 10.555, 10.556, and 10.559** Updated websites in II, "Program Procedures," and III.E.1, "Eligibility Eligibility for Individuals." Updated III.M.1, "Subrecipient Monitoring," and III.N.4, "Special Tests and Provisions Paid Lunch Equity."
- CFDA 10.557 Updated II, "Program Procedures;" III.B.2.b, "Allowable Costs/Cost Principles," to revise a website; III.L.1.d and e, "Reporting Financial Reporting," to revise OMB clearance numbers; and III.N.2, "Special Tests and Provisions Review of Redeemed Food Instruments and Cash-Value Vouchers," to add "farmers' market."
- **CFDA 10.566** Updated II, "Program Procedures," to conform to the changes in Appendix VIII of the Supplement (as described below) and update the citations in "Source of Governing Requirements." Updated III.J, "Program Income," and III.L.1.d, "Reporting Financial Reporting."
- **CFDA 10.568** Changed "USDA foods" to capitalize "Foods" throughout the program supplement. Updated I, "Program Objectives," and II, "Program Procedures." Updated citations in III.E.1.a, "Eligibility Eligibility for Individuals."
- **CFDAs 10.665 and 10.666** Updated I, "Program Objectives;" II, "Program Procedures;" III.G.3.a, "Matching, Level of Effort, Earmarking Earmarking;" and III.H, "Period of Period of Performance." Most changes were due to the locking-in of amounts for Fiscal Years (FYs) 2014 and 2015 payments to FY 2013 amounts.
- **CFDAs 11.300 and 11.307** Removed CFDA 11.010 from the cluster and made conforming changes throughout the program supplement.

- **CFDA 14.157** Updated website in II, "Program Procedures Availability of Other Program Information." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.181** Updated II, "Program Procedures," to reflect requirements in 2 CFR part 200. Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.182** Updated website in II, "Program Procedures Availability of Other Program Information." Removed III.L.3.c, "Reporting Performance Reporting."
- **CFDAs 14.218 and 14.225 -** Added CFDA 14.225, which resulted in the creation of a cluster and changes in I, "Program Objectives;" II, "Program Procedures;" and III.A, "Activities Allowed or Unallowed." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.228** Updated websites in II, "Program Procedures." Updated III.L.1.d, "Reporting Financial Reporting." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.231** Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.235** Removed III.L.1.d, "Reporting Financial Reporting." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.238** Removed III.L.1.d, "Reporting Financial Reporting."
- **CFDA 14.239** Updated citation in III.H, "Period of Performance." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.241** Updated eligibility information included in an application in III.E.1.a, "Eligibility Eligibility for Individuals." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- CFDA 14.256 Updated websites in II, "Program Procedures Availability of Other Program Information." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements. Removed websites in III.N.4, "Special Tests and Provisions Environmental Reviews."

- **CFDA 14.267** Removed III.L.1.d, "Reporting Financial Reporting." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- CFDAs 14.269 and 14.272 Added CFDA 14.272, which resulted in the creation of a cluster and changes in I, "Program Objectives;" II, "Program Procedures;" III.A, "Activities Allowed or Unallowed;" III.G.3, "Matching, Level of Effort, Earmarking Earmarking;" III.H, "Period of Performance;" and III.M, "Subrecipient Monitoring." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements. In III.N, "Special Tests and Provisions," updated N.2, "Citizen Participation;" N.3, "Required Certifications and HUD Approvals;" and N.5, "Rehabilitation."
- CFDA 14.850 Updated websites in II, "Program Procedures Availability of Other Program Information," and III.N.1, "Special Tests and Provisions Wage Rate Requirements." Updated III.B.2, "Allowable Costs/Cost Principles." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.862** Updated website in II, "Program Procedures Availability of Other Program Information." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.866** Updated website in II, "Program Procedures Availability of Other Program Information." Updated III.L.2, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.867** Updated II, "Program Procedures." Updated III.L.2.b, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- CFDAs 14.871 and 14.879 Removed CFDA 14.880 as an individual program, but retained it as a subprogram under CFDA 14.871. Updated II, "Program Procedures;" III.B.2, "Allowable Costs/Cost Principles;" and III.C, "Cash Management." Updated citations in III.A.1, and 3, "Activities Allowed or Unallowed." Updated III.L.2.b, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.872** Updated website in II, "Program Procedures Availability of Other Program Information." Updated III.B.2, "Allowable Costs/Cost Principles." Updated III.L.2.b, "Reporting Performance Reporting," to reflect automated HUD 60002 reporting requirements.
- **CFDA 14.873** Updated website in II, "Program Procedures Availability of Other Program Information." Added III.L.2.b, "Reporting Performance Reporting."

- **CFDA 14.881** Updated website in II, "Program Procedures Availability of Other Program Information." Updated III.B.2, "Allowable Costs/Cost Principles."
- **CFDA 16.710** Updated II, "Program Procedures;" III.B.2, "Allowable Costs/Cost Principles;" III.G.1, "Matching, Level of Effort, Earmarking Matching;" and IV, "Other Information," to add two subprograms, remove references to ARRA, and revise dates.
- **CFDA 16.738** Updated II, "Program Procedures," and III.A, "Activities Allowed or Unallowed."
- **CFDAs 17.207, 17.801, and 17.804** Updated I, "Program Objectives;" II, "Program Procedures;" and III.A.6, "Activities Allowed or Unallowed." Added III.E, "Eligibility," for inclusion of "Eligibility for Individuals."
- **CFDA 17.245** Updated I, "Program Objectives;" II, "Program Procedures;" III.A, "Activities Allowed or Unallowed;" and III.E.1, "Eligibility Eligibility for Individuals."
- CFDAs 17.258, 17.259, and 17.278 Updated throughout to reflect statutory changes resulting from the Workforce Innovation and Opportunity Act, while retaining coverage of the Workforce Investment Act for funds awarded prior to July 1, 2015. Deleted IV, "Other Information."
- **CFDA 17.264** Updated throughout to reflect statutory changes resulting from the Workforce Innovation and Opportunity Act, while retaining coverage of the Workforce Investment Act for funds awarded prior to July 1, 2015. In III.L.2, "Reporting Performance Reporting," added a new 2.b, ETA-9164-NFJP Housing Assistance Summary." Removed III.M, "Subrecipient Monitoring," as the language is essentially that of 2 CFR part 200 and not unique to the program.
- **CFDA 17.265** Updated throughout to reflect statutory changes resulting from the Workforce Innovation and Opportunity Act, while retaining coverage of the Workforce Investment Act for funds awarded prior to July 1, 2015.
- **CFDA 20.000** Updated III.I.2.b.(3), "Procurement and Suspension and Debarment," to revise threshold amount, and updated III.J, "Program Income," to clarify what items are not considered program income in Department of Transportation requirements in 2 CFR part 1201.
- **CFDA 20.001** Updated the list of programs covered by this compliance requirement, including removing the entries for CFDAs 11.010, 81.041, 81.042, and 81.128 because funding (ARRA or other) has ended or the programs have been removed from the Supplement.

- **CFDA 20.106** Updated II, "Program Procedures," and III.G.1, "Matching, Level of Effort, Earmarking Matching," to remove references to ARRA.
- CFDAs 20.205, 20.219, and 23.003 Updated II, "Program Procedures," and III.G.1.b, "Matching, Level of Effort, Earmarking Matching," to remove references to ARRA. In III.I, "Procurement and Suspension and Debarment," added a requirement, and the existing requirement was updated and moved to a new III.N.9, "Special Tests and Provisions Administration of Engineering and Design-Related Service Contracts." Deleted III.N.4, "Project Extensions," and renumbered existing N.5, through N.9 in III.N, "Special Tests and Provisions," to N.4 through N.8, respectively.
- **CFDA 20.223** Updated website in I, "Program Objectives." Updated III.I, "Procurement and Suspension and Debarment," to move the requirements that apply to highway projects to a new III.N.2, "Special Tests and Provisions Administration of Engineering and Design-Related Service Contracts." Renumbered existing III.N to III.N.1.
- CFDAs 20.500, 20.507, 20.525, and 20.526 Updated II, "Program Procedures," III.A.1.h, "Activities Allowed or Unallowed," and III.G.3, "Matching, Level of Effort, Earmarking Earmarking," to add subprograms and remove references to ARRA. Added a requirement to III.I, "Procurement and Suspension and Debarment."
- **CFDA 20.509** Updated II, "Program Procedures," and III.G.3, "Matching, Level of Effort, Earmarking Earmarking," to remove references to ARRA.
- **CFDA 20.600** Updated website in III.A.1.b.(1), "Activities Allowed or Unallowed."
- **CFDAs 21.012 and 21.020** Updated website and capitalized "Financial Assistance" and "Technical Assistance" throughout to eliminate confusion because these are defined terms.
- CFDAs 66.458 and 66.482 Corrected statutory citation under II, "Program Procedures Source of Governing Requirements," and abbreviation for Water Resources Reform and Development Act of 2014 (WRRDA) in III.G.3.b, "Matching, Level of Effort, Earmarking Earmarking." Updated III.G.3.b, "Matching, Level of Effort, Earmarking Earmarking," to reflect current requirements, and IV, "Other Information," to remove unnecessary language. Added a new III.N.7, "Cost Effectiveness Analysis Certification."
- **CFDAs 66.468 and 66.483** Updated III.G.3.c.(1), "Matching, Level of Effort, Earmarking Earmarking," to reflect current requirements, and IV, "Other Information," to remove unnecessary language.

- **CFDA 81.041** Updated throughout to reflect the end of ARRA funding availability (other than through continuing revolving loan fund activity as described in IV, "Other Information"), including removal of III.N, "Special Tests and Provisions." Modified "H," Period of Performance," to reflect a change in the funding process, and IV, "Other Information."
- **CFDA 81.042** Updated throughout to reflect current practice and end of ARRA funding, including removal of III.N, "Special Tests and Provisions" (see also 20.001). Modified III.A, "Activities Allowed or Unallowed," and III.G.3, "Matching, Level of Effort, Earmarking Earmarking," to clarify the use of funds for administration and more appropriately reflect the applicable regulatory language.
- CFDA 84.000 Updated Introduction; II, "Program Procedures;" III.A.1 and 2, "Activities Allowed or Unallowed;" III.B, "Allowable Costs/Cost Principles;" III.G.2.1, "Matching, Level of Effort, Earmarking Level of Effort;" III.H, "Period of Performance;" and III.N, "Special Tests and Provisions." These changes are based on the end of ARRA funding, updated information on waivers under the Elementary and Secondary Education Act of 1965 (ESEA) (ESEA flexibility), and addition of a website. Also updated III.B, "Allowable Costs/Cost Principles," to reflect requirements in 2 CFR part 200.
- **CFDA 84.010** –Updated ESEA flexibility information in II, "Program Procedures;" III.A.2, "Activities Allowed or Unallowed;" III.E.2.b, "Eligibility Eligibility for Groups of Individuals or Area of Service;" III.G.3.b, "Matching, Level of Effort, Earmarking Earmarking;" and, in III.N. "Special Tests and Provisions," N.5, "Special Tests and Provisions Identifying Schools and LEAs Needing Improvement," and N.7, "Special Tests and Provisions Annual Report Card, High School Graduation Rate."
- **CFDA 84.011** Updated references to subgrants in II, "Program Procedures Source of Governing Requirements;" III.A.1, "Activities Allowed or Unallowed;" and III.N.5, "Special Tests and Provisions Subgrant Process (SEAs)." Updated III.E.1, "Eligibility for Individuals;" III.L.3.b.(3), "Reporting Special Reporting;" and III.N.4, "Special Tests and Provisions Priority for Services."
- **CFDAs 84.027 and 84.173** Updated III.G.2.1, "Matching, Level of Effort, Earmarking Level of Effort."
- CFDA 84.032-G Updated websites in III.L.3, "Reporting Special Reporting," and III.N.14, "Special Tests and Provisions Correct Handling of Loans Sold to the U.S. Department of Education." In III.N, "Special Tests and Provisions," updated N.1, "Current Records," to add a test of the status date; updated citations in N.3, "Conditions of Reinsurance Coverage," N.5, "Default Aversion Assistance," N.6, "Collection Efforts," and N.7, "Federal Share of Borrower Payments;" updated citations and deleted out-of-date material in N.9, "Federal

- Fund and Agency Operating Fund;" and updated N.11, "Collection Charges," to revise limits on collection cost charges.
- **CFDA 84.032-L** Updated II, "Program Procedures," and III.L.1.d, "Reporting Financial Reporting," in Part III Special Allowance.
- **CFDAs 84.042, 84.044, 84.047, 84.066, and 84.217** Updated website in II, "Program Procedures;" maximum grant amounts in III.E.1.a.(2), "Eligibility Eligibility for Individuals;" citation in III.G.3.e, "Matching, Level of Effort, Earmarking Earmarking;" and key line item names in III.L.2.b and c, "Reporting Performance Reporting."
- **CFDA 84.048** Updated example years in III.G.2.1.a.(1), "Matching, Level of Effort, Earmarking Level of Effort."
- **CFDA 84.126** Updated I, "Program Objectives;" II, "Program Procedures;" III.E.1, "Eligibility Eligibility for Individuals;" III.G.1, "Matching, Level of Effort, Earmarking Matching;" III.G.2.1, "Matching, Level of Effort, Earmarking Level of Effort;" and III.J, "Program Income."
- **CFDA 84.282** Updated II, "Program Procedures Availability of Other Program Information." Updated citations in III.A.3.c, "Activities Allowed or Unallowed," and III.G.3.c, "Matching, Level of Effort, Earmarking Earmarking."
- **CFDA 84.287** Updated I, "Program Objectives;" II, "Program Procedures;" III.A.1, "Activities Allowed or Unallowed;" III.G.2.2, "Matching, Level of Effort, Earmarking Level of Effort;" and III.G.3, "Matching, Level of Effort, Earmarking Earmarking."
- **CFDA 84.365** Updated II, "Program Procedures Source of Governing Requirements," and III.A.2, "Activities Allowed or Unallowed."
- CFDA 84.366 Updated I, "Program Objectives."
- **CFDA 84.367** Updated website in II, "Program Procedures Availability of Other Program Information."
- **CFDA 84.377** Deleted ARRA program (CFDA 84.388), thus removing this as a cluster. Updated I, "Program Objectives;" II, "Program Procedures;" III.A, "Activities Allowed or Unallowed;" III.E.3.b.(3), "Eligibility Eligibility for Subrecipients;" III.G, "Matching, Level of Effort, Earmarking;" and III.H, "Period of Performance."
- **CFDAs 93.224 and 93.527** Updated name of cluster; I, "Program Objectives;" and II, "Program Procedures." Removed N, "Special Tests and Provisions," as this requirement is monitored by the Federal program office.

- CFDA 93.508 Updated II, "Program Procedures."
- **CFDA 93.525** Updated ending date for approved exception in III.B, "Allowable Costs/Cost Principles."
- **CFDA 93.563** Updated II, "Program Procedures Source of Governing Requirements."
- **CFDA 93.568** Updated II, "Program Procedures."
- CFDAs 93.575 and 93.596 Updated example in III.H, "Period of Performance."
- **CFDA 93.659** Corrected cross reference in III.A.2.c, "Activities Allowed or Unallowed."
- **CFDAs 93.775, 93.777, and 93.778** Updated II, "Program Procedures," and the suggested audit procedures in III.N.3.a, "Special Tests and Provisions ADP Risk Analysis and System Security Review," to conform with the changes to Appendix VIII of the Supplement (as described below).
- **CFDA 94.006** Updated living allowance in III.E.1.c, "Eligibility Eligibility for Individuals."
- **CFDAs 96.001** and **96.006** Updated I, "Program Objectives;" II, "Program Procedures;" III.B.3, "Allowable Costs/Cost Principles;" and III.N, "Special Tests and Provisions." Deleted III. L.1.f, "Reporting Financial Reporting, SSA 871, State Agency Schedule for Equipment Purchases for SSA Disability Programs," because the form is outdated and alternate means of capturing this information are in place.
- **CFDA 97.036** Updated II, "Program Procedures," to add the 2015-2016 threshold for classifying small and large projects and to update the coverage on the alternative procedures for the debris removal pilot.
- **CFDA 97.039** Updated II, "Program Procedures," to indicate federally recognized Indian tribal governments are the eligible tribal entities. Updated throughout to reflect the program's use of the terminology in 2 CFR part 200.
- CFDA 97.067 Updated II, "Program Procedures," and III.A, "Activities Allowed or Unallowed," to, among other things, correct or update statutory citations. Updated III.G.3, "Matching, Level of Effort, Earmarking Earmarking," and III.N, "Special Tests and Provisions Subgrant Awards," to clarify the applicability of these related requirements and include Operation Stonegarden. Updated IV, "Other Information."

## Part 5 - Clusters of Programs

#### • Student Financial Assistance Cluster

- ED programs— Updated II, "Program Procedures Title IV Programs -0 General," to replace "Statement on Auditing Standards No. 70" with "AICPA Codification of Clarified Statements on Auditing Standards (AU-C) Section 402, Audit Considerations Relating to an Entity Using a Service Organization." Updated II, "Program Procedures - Teacher Education Assistance for College and Higher Education Grants (TEACH Grants) (CFDA 84.379)," and II, "Program Procedures - Availability of Other Program Information." Updated a website, dates, Appendix A references, and information on annual limits for unsubsidized loans in III.E.1, "Eligibility – Eligibility for Individuals." Updated information related to availability of 100 percent Federal share under the Federal Work-Study Program (CFDA 84.033). Updated III.L.3, "Reporting – Special Reporting." Updated follow-up requirements in III.L.1.e, "Reporting - Financial Reporting." In III.N, "Special Tests and Provisions," updated the following: N.2, "Verification;" N.3, "Disbursements To or On Behalf of Students;" N.4, "Return of Title IV Funds;" N.6, "Student Loan Repayments (FPL, HPSL/PCL/LDS and NSL, and NFLP);" N.9, "Institutional Eligibility;" and N.13, "Federal Perkins Loan Liquidation." Updated III.N.5, "Special Tests and Provisions – Enrollment Reporting," to reduce the number of days institutions have to submit the Enrollment Reporting roster file from 30 to 15 days. Updated III.N.8, "Special Tests and Provisions – Borrower Data Transmission and Reconciliation (Direct Loan)," to reduce the reporting time from 30 to 15 days. Updated Appendices A and B, including addition of a footnote in item 21 concerning the issuance of a Dear Colleague Letter (GEN-16-05) under the Federal Perkins Loan program.
- o *HHS programs* Updated citations in III.E.1, "Eligibility Eligibility for Individuals," and, in Appendix A, added a statutory citation in item 3. and deleted duplicate language.

### • Research and Development Cluster

- o Added clarifying language in II, "Program Procedures."
- O Updated the web link in III.B, "Allowable Costs/Cost Principles."
- Expanded the language in III.L.1, "Reporting Financial Reporting," and III.N, "Special Tests and Provisions – Key Personnel," to include more complete and accurate coverage for cost-reimbursement contracts under the Federal Acquisition Regulation and to clarify the guidance under 2 CFR part 200.

o In IV, "Other Information – Schedule of Expenditures of Federal Awards," conformed the language to that in 2 CFR section 200.515(a).

#### Other Clusters

 Updated list of other clusters (both those in the Supplement and those not in the Supplement) to remove clusters based on deletion of ARRA programs, update program names, and add new clusters.

#### Part 6 - Internal Control

• Updated to provide an overview of internal control; discuss the Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government' (Green Book) and the Committee of Sponsoring Organizations of the Treadway Commission's (COSO) "Internal Control Integrated Framework" (revised in 2013); and describe characteristics of internal control relating to each of the five components of internal control (as defined by the Green Book).

## Part 7 - Guidance for Auditing Programs Not Included in This Compliance Supplement

 Changed to conform with changes in other parts, including use of terms "should" and "must."

# Appendix I - Federal Programs Excluded from the A-102 Common Rule and Portions of 2 CFR Part 200

• Updated language related to the Omnibus Budget Reconciliation Act of 1981 and the Community Services Block Grant.

# Appendix II - Federal Agency Codification of Governmentwide Requirements and Guidance for Grants and Cooperative Agreements

- Updated to include the dates of agencies' issuance of final rules or regulatory actions subsequent to December 19, 2014 to implement the OMB guidance in 2 CFR part 200.
- Clarified footnote related to OMB-approved exceptions and information provided in Appendix VII of the Supplement.

# Appendix III - Federal Agency Single Audit, Key Management Liaison, and Program Contacts

- Added a listing of key management liaisons and changed the title of the appendix.
- Updated information on responsible single audit offices/officials and program contacts.

• Added language distinguishing the roles of the different type of contacts listed in this appendix.

# **Appendix IV - Internal Reference Tables**

• Updated tables to make corrections, i.e., to add or delete programs that should have been addressed in the 2015 Supplement, and for changes in the 2016 Supplement.

## Appendix V - List of Changes for the 2016 Compliance Supplement

• Updated to provide a list of changes from the Compliance Supplement, dated June 2015, to this 2016 Supplement.

## Appendix VI – Program-Specific Audit Guides

- Removed entry for the Department of Agriculture because it is outdated and is being deleted from the agency's website.
- Removed entry for the Department of Energy for audits of for-profit recipients. That audit guidance is now included at 2 CFR section 910.501-528.
- Added entry for the Department of Education.

## **Appendix VII - Other Audit Advisories**

- Added a new I, "Effect of Implementation of the Uniform Guidance on Major Program Determination," and renumbered the remaining sections accordingly.
- Modified II, "Effect of Changes to Generally Applicable Compliance Requirements in the 2015 Supplement," to change the title of the section to "Effect of Changes to Compliance Requirements," and make it a generic statement of the effect of the removal or addition of compliance requirements in a program/cluster.
- In III, "American Recovery and Reinvestment Act," removed paragraph entitled *Schedule of Expenditures of Federal Awards*.
- Updated IV, "Clarification of Low-Risk Auditee Criteria," by changing the title to "Due Date for Audit Reports and Low-Risk Auditee Criteria;" added coverage of extensions based on the non-availability of the Federal Audit Clearinghouse (FAC) during part of calendar year 2015; added coverage of timing of submission to the FAC of audits completed pursuant to 2 CFR part 200, subpart F; and updated terminology to be consistent with the FAC website.
- Updated web links in V, "Treatment of National Science Foundation and National Institutes of Health Awards," and VII, "Report on the National Single Audit Sampling Project."

- In VI, "OMB-Approved Exceptions to the Guidance in 2 CFR Part 200," clarified that the listing pertains to the December 19, 2014 interim final rulemaking and noted that the dates of agencies' final rulemaking, as shown in Appendix II, can be used to determine any other approved exceptions.
- Removed "Safe Harbor Coverage for Treatment of Large Loan and Loan Guarantee Programs in Type A Program Determination under OMB Circular A-133," based on inclusion of the coverage in 2 CFR part 200, subpart F.
- Removed discussion of effect of review of principals under S&D, as it is no longer needed.

## **Appendix VIII – Examinations of EBT Service Organizations**

- Updated name and contents to reflect issuance of the American Institute of Certified Public Accountants (AICPA) "Statement on Standards for Attestation Engagements (AT) Section 801, Reporting on Controls at a Service Organization." Also, updated to clarify the name of the audit report, i.e., service organization control (SOC) 1 type 2 report. Added clarifying language in several areas.
- Made corresponding changes in Part 1, CFDA 10.551, CFDA 10.566, and CFDA 93.778.

## **Appendix IX - Compliance Supplement Core Team**

• Updated to recognize contributions of the interagency team responsible for the production of the Supplement.