POLICY: COMPLIANCE WITH OMB CIRCULAR A-133

I. PURPOSE:

It is the policy of Marin County Mental Health and Substance Use Services (MHSUS) to operate its programs in compliance with all federal, state, and local laws and regulations. The Office of Management and Budgets (OMB) Circular A-133 sets forth those standards for obtaining consistency and uniformity among Federal agencies for the audit of states, local governments, and non-profit organizations expending Federal funds.

II. REFERENCES:

NNA/DMC State-County Contract, Exhibit B, Part III, Section 1A
OMB Circular A-133

III. POLICY:

Marin County Mental Health and Substance Use Services ensures that the County and its programs with Federal expenditures of more than $500,000 during their respective fiscal years receive a single audit as prescribed in OMB Circular A-133.

IV. AUTHORITY/RESPONSIBILITY:

Contract Managers
Alcohol and Drug Administrator
MHSUS Director

V. PROCEDURE:

The County ensures that the County and its contractors receiving funding under the NNA/DMC State-County Contract comply with requirements of funding sources and applicable laws and regulations through the below methods.

Contractor compliance with this policy shall be achieved through:
1. Distribution of the NNA-SAPT Block Grant Requirements in the Contractor Manual annually at contract renewal.
2. Approval of contract as to form and legal affect by county counsel.
3. Signature of Contractor on contract agreeing to all conditions set forth in the contract.
4. Approval and execution of contract by the County Board of Supervisors or County Administrative Officer.
5. Annual fiscal audit, in which County fiscal staff review contractor’s single audit to ensure requirements of OMB A-133 are met.
6. Annual completion of Self Audit by Contractor, and subsequent review by MHSUS Contract Manager, including Contractor’s signed attestation of adherence to all laws and regulations.

County procedures for complying with OMB Circular A-133 are as follows:
1. The County of Marin undergoes a single audit process each year annually that is initiated at the year-end close of the fiscal year (July 1 to June 30).
2. The County Department of Finance distributes instructions to all departments for reporting single audit information on federal fund expenditures each year. The departments that do not incur expenditures related to federal funding during the fiscal year must send a verification statement indicating as such, from the Department Head or his/her designee to the County’s Department of Finance, Internal Audit Division. The departments that do incur expenditures related to federal funding during the fiscal year are required to complete the “Schedule of Expenditure of Federal Awards (SEFA)” worksheet and attach corresponding supporting documentation and send to the County’s Department of Finance, Internal Audit Division. The department must also complete and submit a “Departmental Questionnaire” and an “Internal Control/Risk Assessment Questionnaire” for each program with federal expenditures over $150,000.
3. The Department of Finance submits the independent audit report to the Board of Supervisors.
4. Submit to the State Controller’s Office within 180 days of the close of the contractor fiscal year a certified copy of an annual audit report from an independent CPA firm.

County compliance with this policy shall be achieved through:
1. Approval of State-County NNA/DMC Contract by Board of Supervisors or authorized designee agreeing to all conditions set forth in the contract.
2. Attestation to compliance with the OMB Circular A-133 requirements at the annual DHCS Monitoring review.
3. Annual completion of Self Audit, including County Alcohol & Drug Administrator’s signed attestation of adherence to all laws and regulations.
4. At annual Site Visit, MHSUS Quality Management shall review a copy of the County’s single audit or documentation from the Department of Finance that the single audit has been submitted as required.