

Audit Extensions

OMB M-20-26

June 18, 2020

The Federal OMB released memorandum M-20-26 on June 18, 2020. The memo rescinded M-20-17 and M-20-20 and allows M-20-11 to expire on July 26, 2020. In addition, OMB reversed the requirements of the single audit extensions from applying the extension to the Fiscal Year End of the grantee to applying the extension to the due of the audit. The extensions are now applied to audits with DUE DATES of June 30, 2020.

This guidance is subject to change based on any additional guidance provided by the Federal OMB.

M-20-26 states:

As the Country is now recovering from the Coronavirus pandemic and some areas are starting the re-opening process, the ramp-up effort is also starting for the performance of Federally-funded projects. In addition, during the Coronavirus pandemic, many recipients learned the capabilities and are now getting the experience to perform the objectives of the Federal programs remotely with limited access to their physical office. However, due to the uncertainty of the re-opening phase and the speed of the ramp-up effort, this memorandum provides an extension of item 1, *Allowability of salaries and other project activities* (item 6 in M-20-17) through September 30, 2020 and item 2, *Extension of Single Audit submission* (item 13 in M-20-17) through December 31, 2020 to allow a responsible transition to normal operations. In light of the limited funding resources provided for each Federal award to achieve its own public performance goals, OMB added restrictions to the flexibilities allowed in item 1, *Allowability of salaries and other project activities*.

Appendix A describes the two flexibilities extended under this memorandum to recipients affected by the loss of operational capacity due to the COVID-19 pandemic. All flexibilities provided in this memorandum are time limited and will expire on September 30, 2020. M-20-17 and M-20-20 are rescinded. M-20-11 expires on July 26, 2020.

Extension of Single Audit Submission from Appendix A, M-20-26:

1. Extension of Single Audit Submission and COVID-19 Emergency Acts Fund Reporting. (2 CFR § 200.512)

Awarding agencies, in their capacity as cognizant or oversight agencies for audit, may allow recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2020 that have normal due dates from March 30, 2020 through June 30, 2020 to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR § 200.501

-Audit Requirements, up to six (6) months beyond the normal due date. Audits with normal due dates from July 31, 2020 through September 30, 2020 will have an extension up to three (3) months beyond the normal due date. **No further action by awarding agencies is required to enact this extension. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients should maintain documentation of the reason for the delayed filing.** Recipients and subrecipients taking advantage of this extension would still qualify as a "low-risk auditee" under the criteria of 2 CFR § 200.520 (a) Criteria for a low-risk auditee.

Additionally, in order to provide adequate oversight of the COVID-19 Emergency Acts funding and programs, recipients and subrecipients must separately identify the COVID-19 Emergency Acts expenditures on the Schedules of Expenditures of Federal Awards and audit report findings.

Applying this flexibility to the GATA Audit Requirements

GATA adopts federal Uniform Guidance for state grant making requirements. As such, the automatic audit extension, including the requirement for documentation of the reason, will be afforded to State of Illinois grantees subject to all audits **required** by GATA. If a grantee is required to have an audit conducted due to other law or regulation, the grantee should contact the entity requiring the audit to confirm the audit due date extension.

Audit Due Dates

Fiscal Year End	Single Audit Due Date - Original	Single Audit Due Date - Extended		Financial Audit Due Date - Original	Financial Audit Due Date - Extended
6/30/2019	3/31/2020	9/30/2020		12/31/2019	N/A
7/31/2019	4/30/2020	10/31/2020		1/31/2020	N/A
8/31/2019	5/31/2020	11/30/2020		2/29/2020	N/A
9/30/2019	6/30/2020	12/31/2020		3/31/2020	9/30/2020
10/31/2019	7/31/2020	10/31/2020		4/30/2020	10/31/2020
11/30/2019	8/31/2020	11/30/2020		5/31/2020	11/30/2020
12/31/2019	9/30/2020	12/31/2020		6/30/2020	12/31/2020
1/31/2020	10/31/2020	N/A		7/31/2020	10/31/2020
2/29/2020	11/30/2020	N/A		8/31/2020	11/30/2020
3/31/2020	12/31/2020	N/A		9/30/2020	12/31/2020
4/30/2020	1/31/2021	N/A		10/31/2020	N/A
5/31/2020	2/28/2021	N/A		11/30/2020	N/A
6/30/2020	3/31/2021	N/A		12/31/2020	N/A