

Snapshot

AUGUST 20, 2024
SNAPSHOT 2024-06

2024 OMB Compliance Supplement released

The Office of Management and Budget (OMB) issued the *2024 Compliance Supplement – 2 CFR Part 200, Appendix XI (2024 Supplement)* for single audit engagements. The 2024 Supplement identifies the compliance requirements for auditors to consider when performing single audits under the OMB's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Entities subject to single audits can refer to the 2024 Supplement to familiarize themselves with the types of compliance testing that auditors may perform and reporting submission deadlines. This Snapshot highlights key changes made from the 2023 Compliance Supplement.

Effective date

The 2024 Supplement is effective for audits of fiscal years beginning after June 30, 2023. It supersedes the 2023 Compliance Supplement (dated May 2023).

The OMB posted the 2024 Supplement by section on [whitehouse.gov](https://www.whitehouse.gov).

Key 2024 Supplement changes

The 2024 Supplement provides essential guidance for auditors that perform single audits as well as

potential insights for auditees. The following list summarizes areas of the 2024 Supplement with key changes:

- [Appendix IV](#), “Higher Risk Designation” (previously titled “Internal Reference Tables”), identifies programs that are designated as “higher risk” and includes guidance on how the “higher risk” designation impacts the major program determination process.
- [Appendix V](#), “List of Changes for the 2024 Compliance Supplement,” identifies changes that could affect single audit engagements. These changes apply across many of the programs in the 2024 Supplement that affect the scope of the single audit.
- [Appendix VII](#), “Other Audit Advisories,” provides information on the latest OMB announcements that may impact 2024 single audits, including
 - The continuation of the requirement for recipients of federal awards to separately identify COVID 19-related expenditures from non-COVID 19 expenditures on the Schedule of Expenditures of Federal Awards (SEFA)
 - Guidance on determining whether an auditee’s prior-year Data Collection Form was submitted to the Federal Audit

Clearinghouse on time for purposes of meeting the low-risk auditee criteria in the current year

- A new section on the 2024 revisions to the OMB’s *Guidance for Federal Financial Assistance*, which are effective Oct. 1; federal agencies may elect to implement these revisions for new awards and amendments made to existing awards as early as June 21
- The Student Financial Assistance cluster revises several compliance requirements, including revising several requirements in Special Tests and Provisions.
- Provider Relief Fund (PRF) and American Rescue Plan (ARP) Rural Distribution (collectively referred to as PRF) adds clarifications on (a) how and when to report PRF expenditures and lost revenue on the

SEFA for fiscal year-ends on or after June 30, 2024, and (b) the timing of when expenditures and lost revenue are to be reported in the PRF portal for Period 7.

- Coronavirus State and Local Fiscal Recovery Funds (SLFRF) updates the definition of “obligation,” adds three new program objectives, and continues to allow the alternative for certain recipients to elect a compliance examination in accordance with *Government Auditing Standards* in lieu of a full single audit or program-specific audit.

Other reminders

The terminology change from “Catalog of Federal Domestic Assistance” (CFDA) to “Assistance Listing” (AL) announced in the 2021 Compliance Supplement continues in the 2024 Supplement. The reference to AL is also reflected on the SEFA and the Data Collection Form. The AL is located at www.sam.gov.

Contacts



Dennis Morrone
*National Managing Partner – Not-
for-Profit & Higher Education
Industry Practices*
T +1 732 516 5582
E Dennis.Morrone@us.gt.com



Angelica Roiz
*Partner
Audit – Not-for-Profit & Higher
Education Industry Practices*
T + 1 215 814 1711
E Angelica.Roiz@us.gt.com



Rachel Stushek
*Professional Practice Director
Audit and Assurance Services*
T + 1 703 637 2633
E Rachel.Stushek@us.gt.com

This Grant Thornton Advisors LLC content provides information and comments on current issues and developments. It is not a comprehensive analysis of the subject matter covered. It is not, and should not be construed as, accounting, legal, tax, or professional advice provided by Grant Thornton Advisors LLC. All relevant facts and circumstances, including the pertinent authoritative literature, need to be considered to arrive at conclusions that comply with matters addressed in this content.

Grant Thornton Advisors LLC and its subsidiary entities are not licensed CPA firms. For additional information on topics covered in this content, contact a Grant Thornton Advisors LLC professional.

* “Grant Thornton” refers to the brand name under which the Grant Thornton member firms provide services to their clients and/or refers to one or more member firms, as the context requires.

Grant Thornton LLP and Grant Thornton Advisors LLC (and their respective subsidiary entities) practice as an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations, and professional standards. Grant Thornton LLP is a licensed independent CPA firm that provides attest services to its clients, and Grant Thornton Advisors LLC and its subsidiary entities provide tax and business consulting services to their clients. Grant Thornton Advisors LLC and its subsidiary entities are not licensed CPA firms.

Grant Thornton International Limited (GTIL) and the member firms, including Grant Thornton LLP and Grant Thornton Advisors LLC, are not a worldwide partnership. GTIL and each member firm are separate legal entities. Services are delivered by the member firms; GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another’s acts or omissions.

© 2024 Grant Thornton Advisors LLC | All rights reserved | U.S. member firm of Grant Thornton International Ltd.