

## **Single Audit Act Requirements Office of Management and Budget Circular A-133**

On November 6, 2001, the U.S. Environmental Protection Agency (EPA) clarified Single Audit Act (SAA) and Office of Management and Budget (OMB), Circular A-133 (Revised, June 27, 2003), requirements as they apply to loans made from the Drinking Water Revolving Fund (DWRF) and State Revolving Fund (SRF). EPA Program Guidance states that funds “directly” made available from DWRF or SRF capitalization grants are to be considered federal funds. Funds drawn for a DWRF or SRF loan will often, at least in part, be considered federal funds. OMB Circular A-133, requires any non-federal entity expending \$500,000 or more in federal funds from any source in a fiscal year to comply with the requirements of the Single Audit Act and the Circular.

The SAA and OMB Circular A-133 specify that the reporting threshold is met when a sub-recipient’s (in this case the recipient of an SRF or DWRF loan) expenditures of any federal funds exceed the \$500,000 threshold during a fiscal year. For the purposes of the DWRF and SRF, an expenditure occurs at the time that funds are disbursed by the loanee/sub-recipient for the purpose of which the assistance is provided (i.e., construction.) Non-federal entities meeting that threshold must have a single audit conducted for that year.

This single audit must be performed and copies provided to the Department of Environmental Quality within nine months from the end of the entity’s fiscal year.

In order to ensure that the SRF/DWRF programs are included in the Single Audit activities, it is the responsibility of the non-federal entity to report the federal financial assistance related to this program on its annual Schedule of Expenditures of Federal Awards. The specific amount of each draw considered to be federal funds and that must be reported on the Schedule is identified in the loan draw confirmation letter transmitted to the loan recipient by the Michigan Finance Authority (MFA).

The Catalog of Federal Domestic Assistance (CFDA) lists SRF and DWRF assistance under the following:

<u>CFDA Number</u>	<u>Program Title</u>
66.458	Capitalization Grants for Clean Water State Revolving Funds
66.468	Capitalization Grants for Drinking Water State Revolving Funds

Questions can be directed to your project manager or MFA staff.