### BO4. Update on Auditing Requirements for *Title IV Programs* (Q&A)

**Question:**

Does the new 30 day/6 month audit submission requirement apply to public schools.

**Response:**

SME Bales: No, they do not. Public schools are subject to the due dates established for single audits, which is the earlier of 9 months after FYE or 30 days from receipt of the report (2 CFR 200.512(a)).

**Question:**

Do slides 15-18 apply to Single Audits?

**Response:**

SME Bales: No, those slides apply only to proprietary schools audited under the new 2023 Title IV Audit Guide. You'll hear now about changes to single audits.

**Question:**

below there is an answer to a question about 9 months and six months. where did the $750,000, which is now 1 million come in?

**Response:**

SME Bales: $750,000 in Federal expenditures is currently the threshold for single audit, though there is a proposal to increase that threshold to $1,000,000. All proprietary schools are subject to audit because there is no established audit threshold.

**Question:**

Does this applies to foreign schools as well?

**Response:**

SME -Felski: These changes apply to audits of proprietary schools per the new 2023 Title IV Audit Guide. They do not apply to audits of foreign schools. Are you asking about a specific requirement for foreign school audit?

**Response:**

Thank you for your reply. Just the changes covered in the slides. Just so I am clear, the Foreign Schools Audit Guide from 2020 remains unchanged?

**Response:**

SME - Felski: Yes, the 2020 Foreign Schools Audit Guide remains in effect. However, please note that we issued several Dear CPA Letters amending some sections of the Guide.

**Response:**

Thank you!

**Question:**

when do these regulations go into effect? which audit?

**Response:**

SME Bales: If you are asking when the new audit guide is effective, it's for FY beginning January 1, 2023. So if you have a FYE of 12/31, then you're FYE 12/31/23 audit will be using this guide. If you have a 6/30/23 FYE, then your first audit subject to this guide will be 6/30/24.

**Question:**

Does testing for SAP now include an institution proving they review their SAP policy annually and document said reviews?

**Response:**

I ask because I do not see that in the audit supplement.

**Response:**

SME Bales: Yes, this is still a required procedure at C.8.1.d. It was just moved into the Written Policies and Procedures section, from the Student Eligibility section.

**Response:**

Where can I find C.8.1.d.? And is this applicable for reviewing other policies such as R2T4 and Verification among others?

**Response:**

SME Bales: C.8.1.d refers to a section within the 2023 Title IV Audit Guide, that requires the auditor to evaluate a school's SAP policy. There are other requirements in C.8.1 for the auditor to evaluate the verification and LOA policies, as well as procedures for the approval, disbursement, and delivery of Title IV funds.

**Question:**

why are you saying that audits have to be submitted in 6 months or 30 days from the report. Isn't in 9 months from the end of the fiscal year?

**Response:**

SME Bales: Single audits are still due 9 months from the end of the fiscal year or 30 days from report receipt. The new rules apply to audits other than single audits (propriety schools, foreign schools, third-party servicers) and their reports are due 6 months from FYE or 30 days from the report date, whichever is sooner.

**Question:**

I was unable to locate the HEERF report on the oig site. Can you provide the link where it can be accessed?

**Response:**

SME - Felski: The flash report on HEERF audit resolution activities can be found at this link https://oig.ed.gov/reports/other/us-department-educations-higher-education-emergency-relief-fund-audit-resolution. Please click on Download PDF at the top of the page to open a copy of the report.

**Response:**

SME - Felski: You can also go to the Reports section on OIG's website and scroll down to November 15, 2023, and click on the link for the HEERF flash report.