



<b>Health Care Agency Behavioral Health Services Policies and Procedures</b>	Section Name:	Compliance
	Sub Section:	Fiscal
	Section Number:	07.02.01
	Policy Status:	<input type="checkbox"/> New <input checked="" type="checkbox"/> Revised

	SIGNATURE	DATE APPROVED
Chief of Operations Behavioral Health Services	<u>Signature on File</u>	<u>8/13/15</u>

**SUBJECT:** Compliance with Federal Award Requirements for Substance Abuse Programs

**PURPOSE:**

To ensure compliance with all pertinent Federal regulations pertaining to the operation of Substance Abuse Prevention and Treatment (SAPT) Block Grant funded Alcohol and Other Drug treatment programs in the County of Orange. This policy is not meant to exclude any and all other laws, statutes, and regulations pertinent to the operation of SAPT Block Grant funded Substance Use Disorders Services (SUDS) Programs.

**POLICY:**

It is the policy of County of Orange Behavioral Health and its SUDS Programs to comply with all audit requirements set forth in the County of Orange's Net Negotiated Amount (NNA) contract including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 CFR Part 200) formerly referred to as the Single Audit Act (OMB Circular A-133).

**SCOPE:**

County of Orange County Behavioral Health – Substance Use Disorders Services (SUDS) Programs

**REFERENCES:**

County of Orange Net Negotiated Amount (NNA) Contract, Exhibit B, Section H

Code of Federal Regulations, Title 2, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

**PROCEDURE:**

1. Upon notification of award, the program administrator shall review the award document and verify federal funding and provide information to Program Support and Contract Services who shall verify all required information such as the CFDA #, etc is provided. Contract Services is required to provide specific information on the award notification to all sub recipients. This must be done timely to ensure contracts are executed properly.

2. The Program Administrator shall review the award document and note any special compliance requirements and ensure they are met.
3. Program Support shall review transactions for the program to ensure coding is correct and make any corrections timely.
4. Contract Administrator shall receive, review, and approve all contractor invoices and supporting documentation to monitor compliance and reasonableness prior to submitting to the Auditor-Controller for payment.
5. On a regular basis, processes shall be reviewed to ensure proper controls are in place to ensure compliance with the grant agreement. This includes reasonable monitoring of all sub-recipients.
6. At the end of each fiscal year, all applicable expenditures of federal awards are properly reported to the Auditor-Controller's Office to be included in their Schedule of Federal Expenditures Report (SEFA) which may be subject to a Single Audit.
7. In the event of a Single Audit, the Program Manager, Program Support, and Accounting shall collaborate and provide all required documentation and respond timely to auditor questions. Any finding shall be discussed with management and corrective action plans agreed to and implemented timely.