

GATA Audit Submission Extension Process

Single Audit Report Request for Extension

The Office of Management and Budget (OMB) issued revisions to the Single Audit requirements in 2 CFR 200 Subpart F which were effective for non-Federal entities' fiscal years beginning on or after October 1, 2024. Per 2 CFR 200.512(a)(1), the audit, the data collection form, and the reporting package must be submitted within 30 calendar days after the auditee receives the auditor's report(s) or nine months after the end of the audit period (whichever is earlier). *The cognizant agency for audit or oversight agency for audit (in the absence of a cognizant agency for audit) may authorize an extension when the nine-month timeframe would place an undue burden on the auditee.* If the due date falls on a Saturday, Sunday, or Federal holiday, the reporting package is due the next business day.

Only the *federal* cognizant agency for audit or *federal* oversight agency for audit (in the absence of a cognizant agency for audit) may authorize an extension to the single audit reporting package submission.

- If a grantee is required to have a single audit conducted and has a *federal* cognizant agency for audit or *federal* oversight agency for audit (in the absence of a cognizant agency for audit), the grantee must obtain authorization, for a single audit reporting package submission extension, from its applicable *federal* agency.
- If a grantee is required to have a single audit conducted, but only received pass-through funding from a State awarding agency and did not receive direct federal funding, the single audit extension request may be sent by the grantee to its State cognizant agency, who will then submit the single audit extension request to its *federal* cognizant agency.

Financial Statement Audit Report Request for Extension

As GATA adopts federal guidance, the revisions to the Single Audit requirements in 2 CFR 200 Subpart F, which were effective for non-Federal entities' fiscal years beginning on or after October 1, 2024, are to be applied to all State-issued awards. Therefore, the extension guidance provided in 2 CFR 200.512(a)(1) is applicable to the financial statement audit rules and policies set forth by 44 Illinois Administrative Code 7000.90.

Undue Burden Definition and Examples

An undue burden is defined as an unforeseen event that disrupts operations beyond the grantee's control. Such an event can impose significant challenges limiting the grantee's ability to function effectively. It must be a substantial or an unjust obstacle that could not have been avoided or overcome by the grantee (or its auditor) through planning and reasonable diligence.

Examples of undue burden, include, but are not limited to:

- Natural Disasters (hurricanes, earthquakes, floods, wildfires, tornadoes, ice storms)
- Pandemics (COVID-19)

- National Emergencies
- Cybersecurity/Ransomware Attacks
- Server Crash
- Property Destruction (office fire, pipes burst)
- Auditor issues (obstacles) out of the grantee's control (grantee dropped as client, resignation, bankruptcy)

Request for Single Audit or Financial Statement Audit Extension – Grantee Requirements

The requirements for a grantee to request a one-time audit package submission extension include:

- All audit extension requests should be received, by the State cognizant agency, at least 60 calendar days prior to the audit package submission deadline.
- The extension request, completed by the grantee in the Grantee Portal, must include:
 - Grantee Name
 - GATA ID
 - Audit ID
 - Grantee's Audit Review Period
 - Grantee's Audit Type
 - Justification for extension, including an explanation of how external events significantly hindered the grantee's ability to meet the deadline.
 - New proposed date for the report submission (3 month maximum).
 - Corrective action plan to ensure that future reports will be filed timely.
 - Audit Engagement Letter – The engagement letter must be signed within 3 months after the grantee's fiscal year-end.
- If the grantee is required to have a single audit conducted and has a *federal* cognizant agency for audit or a *federal* oversight agency for audit (in the absence of a cognizant agency for audit), in addition to the above, the grantee **must** upload:
 - The authorization received from its *federal* cognizant agency for audit or *federal* oversight agency for audit that supports its approved single audit submission extension.

Request for Single Audit or Financial Statement Audit Extension – State Cognizant Agency Requirements

The requirements for the State cognizant agency include:

- Review previous fiscal year audit cases to determine if the grantee has had untimely audit package submissions in the past. The State cognizant agency should also review previous fiscal year audits to determine if the grantee has received audit findings related to untimely audit submissions.
- Determine if the undue burden affects other project deliveries and performance activities under the award beyond the audit process described in 2 CFR 200, Subpart F-Audit Requirements.
- Utilize the Grantee Compliance Enforcement System (GCES) for grantees who misuse extension requests or fail to demonstrate a valid undue burden.

- Respond to extension requests within a reasonable timeframe to ensure timely communication.

If the grantee is required to have a single audit conducted and has a *federal* cognizant agency for audit or a *federal* oversight agency for audit (in the absence of a cognizant agency for audit), the requirements for the State cognizant agency includes:

- Review the *federal* agency authorization uploaded by the grantee that supports the single audit submission extension.

If the grantee is required to have a single audit conducted, but only received pass-through funding from a State awarding agency and did not receive direct federal funding, the requirements for the State cognizant agency includes:

- Submit the grantee's single audit extension request to its *federal* cognizant agency for authorization.