



## SUMMARY OF COMMENTS

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There were 3 comments to the draft version of this policy:

Comment #1 -The policy references the OMB Circular A-133, but didn't the Uniform Guidance supersedes eight OMB Circulars, including OMB Circular A- 133?

Resolution #1 – This reference was used due to the relevant directives from the State of California still referencing OMB Circular A-133. This reference should be changed to Uniform Guidance, Subpart F – Audit Requirements.

Comment #2 – When wouldn't the WANB keep a control log?

Resolution # 2 – The Alliance would not keep a control if the Alliance determines that a finding is not relevant to the subrecipients relationship with Alliance. For example, a subrecipient has findings on a non-WIOA program that the Alliance has no oversight over. These findings may or may not be a concern to the Alliance.

This language will be clarified to “Complete a Control Log when relevant to subrecipient contract with the Alliance”.

Comment #3 – Will the WANB provide written notification during the “informal resolution process”? And how long is this process and what is the turnaround time for the Subrecipient to submit documentation?

Resolution #3 – Section I-C. states that the resolution process should be completed within 6 months. The resolution process is completed when a final determination is issued. Per section I-E-4, a subrecipient has 30 calendar days after the final determination is issued to submit a written request for a hearing if they wish to dispute the final determination.