



City of San Antonio

Agenda Memorandum

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In Control: Audit and Accountability Committee

CITY OF SAN ANTONIO
FINANCE DEPARTMENT
Interdepartmental Correspondence

TO: Erik Walsh, City Manager

FROM: Troy Elliott, CPA, Deputy Chief Financial Officer

COPIES: Audit and Accountability Committee; Ben Gorzell, CPA, Chief Financial Officer; Kevin Barthold, City Auditor

SUBJECT: Discussion on OMB Super Circular (Grant) Requirements for Procurements

DATE: February 18, 2020

Organizations receiving federal funds are subject to the procurement guidelines under the Super Circular. The Federal Office of Management and Budget ("OMB") issued the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule (Uniform Guidance) on December 26, 2013", which is referred to as OMB "Super Circular" and is codified at 2 CFR Part 200. The Super Circular supersedes and streamlines requirements of eight previously issued OMB Circulars applicable to the administration, use and audit of federal grant funds by non-profit organizations, state, local and tribal governments, and colleges and universities. The effective date of the procurement guidelines required by the Super Circular were delayed. The City was required to be in full compliance on October 1, 2018.

Finance has been monitoring all existing annual contracts awarded as a result of the new compliance guidelines, since its effective date of October 1, 2018, and has not identified any contracts impacted by the introduction of the Super Circular. Currently, an upcoming solicitation has been identified as the first annual contract in which federal grant funds would have an impact and would limit the use of the Local Preference Program.

Staff will provide a briefing to the Audit and Accountability Committee on the current Office of Management and Budget (OMB) Uniform Guidance (Super Circular) guidelines and procurement standards for federally funded annual contracts awarded by the City.