

accounting for pass through grants

Accounting for Pass-Through Grants: A Comprehensive Guide

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Dr. Evelyn Reed is a certified public accountant (CPA) and Chartered Global Management Accountant (CGMA) with over 20 years of experience in governmental and non-profit accounting. She has specialized in the intricacies of grant accounting, particularly focusing on pass-through grants, and has published numerous articles and presented at national conferences on the subject. Her expertise includes auditing, financial reporting, and compliance related to pass-through grant regulations.

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The IIA is a globally recognized professional organization dedicated to the advancement of the internal audit profession. Their publications are widely respected for their rigor and accuracy, providing authoritative guidance on a wide range of financial and operational topics, including the complex area of accounting for pass-through grants. Their authority stems from their dedication to professional standards, ongoing research, and a vast network of experienced internal auditors.

Editor: Mr. Arthur Miller, CIA, CPA

Mr. Arthur Miller is a Certified Internal Auditor (CIA) and a Certified Public Accountant (CPA) with extensive experience in government auditing and compliance. His expertise in financial regulations and his deep understanding of the challenges organizations face in accounting for pass-through grants provide significant credibility to this article.

Keywords: accounting for pass-through grants, pass-through grant accounting, government grants, grant accounting standards, compliance, audit, financial reporting, non-profit accounting, governmental accounting, single audit

1. Historical Context of Pass-Through Grant Accounting

The practice of awarding grants through intermediary organizations – the essence of pass-through grants – has evolved alongside the growth of government funding programs. Initially, simpler methodologies were used, often lacking the stringent regulatory requirements of today. However, as government funding

increased, so did the need for greater transparency, accountability, and consistency in how these funds were managed and reported. The rise of sophisticated federal programs, such as those under the purview of the US Department of Health and Human Services (HHS) and the Department of Education, significantly impacted the development of accounting standards and compliance requirements for pass-through grants. This led to the development of more formal guidelines and regulations aimed at ensuring the proper accounting for pass-through grants. The increasing emphasis on preventing fraud and waste further propelled the formalization of accounting principles specific to this area.

2. Understanding Pass-Through Grants

A pass-through grant is a financial award from a federal, state, or local government agency to a recipient organization (the subrecipient) that is tasked with subsequently distributing a portion of the funds to other organizations (sub-recipients). The primary recipient is responsible for ensuring that the subrecipients comply with all applicable terms and conditions of the grant. This arrangement differs from direct grants, where funding is provided directly from the grantor to the ultimate beneficiary. The complexity of accounting for pass-through grants stems from the layered responsibility and the need for meticulous tracking of funds from the original grantor down through each subrecipient. Proper accounting for pass-through grants necessitates a comprehensive system for monitoring the subrecipients' financial activity and ensuring compliance with regulations.

3. Key Accounting Standards and Regulations

Accounting for pass-through grants is governed by a complex web of regulations and accounting standards. Key standards include the Uniform Guidance (2 CFR 200), which provides comprehensive requirements for the administration of federal awards. This guidance outlines the responsibilities of both the primary recipient and the subrecipients in managing and accounting for the funds. Understanding and adhering to these regulations is crucial for avoiding penalties and maintaining the integrity of the grant program. The specifics of accounting for pass-through grants can vary depending on the grantor's requirements, the nature of the grant program, and the type of recipient organization involved. Compliance requires a thorough understanding of all applicable regulations and consistent application of accounting principles throughout the grant lifecycle.

4. Challenges in Accounting for Pass-Through Grants

Effective accounting for pass-through grants presents several significant challenges. These include:

Maintaining accurate records: Tracking funds through multiple layers of recipients necessitates robust record-keeping systems.

Ensuring compliance: Meeting the diverse requirements of various grantors and regulatory bodies requires substantial expertise and diligent oversight.

Monitoring subrecipients: Overseeing the financial activities of subrecipients and ensuring adherence to

grant terms can be resource-intensive.

Internal controls: Implementing strong internal controls to prevent fraud and misuse of funds is paramount.

Reporting requirements: Preparing accurate and timely reports to both the grantor and subrecipients can be complex and time-consuming.

5. Best Practices for Accounting for Pass-Through Grants

Organizations managing pass-through grants should adopt best practices to mitigate risks and ensure compliance. These include:

Developing clear policies and procedures: Establishing documented guidelines for all aspects of grant management and accounting is essential.

Implementing robust internal controls: Strong internal controls help prevent errors and fraud.

Providing training to staff: Ensuring that all personnel involved understand the regulations and procedures is crucial.

Regular monitoring and oversight of subrecipients: Frequent communication and monitoring help identify potential issues early.

Maintaining detailed documentation: Comprehensive documentation is crucial for auditing and compliance purposes.

6. Auditing and Compliance

Regular audits are crucial for ensuring compliance with grant regulations. The single audit process, often mandated for recipients of federal awards exceeding a certain threshold, is particularly relevant for entities receiving and managing pass-through grants. These audits provide an independent assessment of the recipient's financial management practices and compliance with applicable regulations. Effective accounting for pass-through grants reduces audit risks and ensures the continued receipt of grant funding.

7. Current Relevance and Future Trends

Accounting for pass-through grants remains a critical area, particularly given the increasing reliance on government funding for various programs and initiatives. The ongoing evolution of regulations and the increased scrutiny around transparency and accountability necessitates a continuous adaptation of accounting practices. Future trends will likely involve greater use of technology for streamlined grant management and improved reporting, along with a heightened focus on data analytics to detect and prevent fraud and misuse of funds.

8. Conclusion

Accounting for pass-through grants is a complex but essential aspect of managing government funding. A strong understanding of relevant regulations, coupled with robust internal controls and meticulous record-

keeping, is crucial for ensuring compliance, minimizing risks, and maintaining the integrity of grant programs. Organizations must stay informed about evolving regulations and best practices to effectively manage these grants and continue to secure funding for their vital work.

FAQs

1. What is the difference between a direct and pass-through grant? A direct grant goes directly from the grantor to the end beneficiary, while a pass-through grant goes from the grantor to a primary recipient, who then distributes it to sub-recipients.
1. What is the Uniform Guidance (2 CFR 200)? The Uniform Guidance is a set of federal regulations that governs the administration of federal awards, including pass-through grants.
1. What are the key responsibilities of a primary recipient in a pass-through grant? The primary recipient is responsible for ensuring that sub-recipients comply with all applicable terms and conditions, monitoring their financial activity, and reporting to the grantor.
1. What are some common challenges in accounting for pass-through grants? Challenges include maintaining accurate records, ensuring compliance with complex regulations, monitoring subrecipients, implementing strong internal controls, and preparing accurate reports.
1. What are some best practices for accounting for pass-through grants? Best practices include developing clear policies and procedures, implementing robust internal controls, providing training to staff, regular monitoring of subrecipients, and maintaining detailed documentation.
1. What is the single audit? The single audit is an independent audit of a recipient's financial statements and compliance with federal regulations, often required for organizations receiving significant federal funding.

1. What are the penalties for non-compliance with pass-through grant regulations? Penalties can include loss of future funding, repayment of funds, and legal action.
1. What role does technology play in accounting for pass-through grants? Technology can streamline grant management, improve reporting accuracy, and facilitate better monitoring of subrecipients.
1. Where can I find more information on accounting for pass-through grants? You can find more information from the websites of the federal government, professional accounting organizations, and grant-related resources.

Related Articles:

1. "Understanding the Uniform Guidance (2 CFR 200): A Practical Guide for Grant Recipients": This article provides a detailed explanation of the Uniform Guidance and its implications for organizations receiving pass-through grants.
1. "Best Practices for Monitoring Subrecipients in Pass-Through Grants": This article focuses on strategies for effectively monitoring and overseeing subrecipients to ensure compliance and prevent fraud.
1. "Implementing Robust Internal Controls for Pass-Through Grants": This article explores different internal control mechanisms to minimize risks associated with pass-through grants.
1. "Navigating the Single Audit Process for Pass-Through Grants": This article offers a comprehensive guide to the single audit process and its implications for organizations receiving pass-through grants.

1. "The Role of Technology in Streamlining Pass-Through Grant Management": This article examines how technology can improve efficiency and transparency in managing pass-through grants.
1. "Developing Clear Policies and Procedures for Pass-Through Grants": This article provides guidance on creating well-defined policies and procedures for effective grant management.
1. "Case Studies in Pass-Through Grant Accounting: Lessons Learned": This article explores real-world examples of successful and unsuccessful pass-through grant management to highlight key lessons.
1. "Fraud Prevention in Pass-Through Grants: A Comprehensive Approach": This article focuses on strategies to prevent and detect fraud in the context of pass-through grants.
1. "Financial Reporting Requirements for Pass-Through Grants: A Step-by-Step Guide": This article details the specific reporting requirements for organizations managing pass-through grants, clarifying what information must be reported and how.

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trials'. These may be complex and expensive undertakings, requiring the follow-up of hundreds, or thousands, of individuals, often for long periods. Descriptions of the detailed procedures and methods used in the trials that have been conducted have rarely been published. A consequence of this, individuals planning such trials have few guidelines available and little access to knowledge accumulated previously, other than their own. In this manual, practical issues in trial design and conduct are discussed fully and in sufficient detail, that Field Trials of Health Interventions may be used as a 'toolbox' by field investigators. It has been compiled by an international group of over 30 authors with direct experience in the design, conduct, and analysis of field trials in low and middle income countries and is based on their accumulated knowledge and experience. Available as an open access book via Oxford Medicine Online, this new edition is a comprehensive revision, incorporating the new developments that have taken place in recent years with respect to trials, including seven new chapters on subjects ranging from trial governance, and preliminary studies to pilot testing.

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- Understand the challenges posed by the changing context of public administration
- Explore how relationships and decisions influence public policies and programs
- Learn the critical skills and tools public administrators must master to be effective
- Explore the ethics and liabilities of public administration, and what it means to take part

The role of public administration is evolving, and the changing nature of the field will impact the way policies and programs are designed and implemented. This book fully explores current and upcoming changes domestically and internationally against the backdrop of public administration fundamentals. For the student or professional seeking a deeper understanding of the public administrator's role, *Handbook of Public Administration* is a clear, comprehensive resource.

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GASB Statement #24 addresses the proper accounting for pass-through grants. According to this statement, “All cash pass-through grants received by a governmental entity (referred to as a ...

3. ACCOUNTING

Reporting for Certain Grants and Other Financial Assistance, defines pass-through grants as those grants and other financial assistance received by a governmental entity (recipient ...

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ABFR CHAPTER 11 Schedule of Expenditures of Federal ...

awarding agency or pass-through entity provides a specific level of support without regard to actual costs incurred under the Federal award. This type of Federal award reduces some of the ...

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Implementing the Uniform Guidance - U.S. Department of...

The Uniform Guidance is now in effect for grants awarded on or after 12/26/2014 . 6 ... The entity must make available, upon request from the Department or a pass-through entity, technical ...

International Public Sector Accounting Standards Funding ...

d) For pass-through grants, guidance on accounting for advance transfers to implementing partners vs. beneficiaries; guidance on the definition of an agent in this context; see section 7.1 ...

CHARITIES SORP (FRS 102) - GOV.UK

accounting and reporting by charities: ... general principles for recognising income from donations and grants 52 identification of terms and conditions ... accounting for activities partly ...

(GAAP Manual Part 1: Charts of Accounts, Budgeting and ...

Certain Grants and Other Financial Assistance (Formerly Pass-Through Grants) 3.7.2 Expenditures 3.8 Confidential Funds (Drug Buy Money, Investigative Funds) 3.8.9 Electronic ...

CALIFORNIA SCHOOL ACCOUNTING MANUAL - OCDE

Publishing Information. The . California School Accounting Manual (2019 Edition) was approved by the California State Board of Education on January 9, 2019.

Grant Reimbursement Manual Contents

The State of Minnesota, acting through its Commissioner of the Natural Resources, administers federal pass-through grant projects for Minnesota's Lake Superior Coastal Program. Coastal ...

Fund Accounting for Townships and Districts - ohioauditor.gov

• Effective cash-basis fund accounting is accomplished through the use of journals and ledgers. • Cash Journal ... transactions, with the exception of pass-through grants, for which the ...

Language Provisions - The Official Web Site for The State of ...

Division of Budget and Accounting: emergency disaster aid funds including grants for preventive measures; pass-through grants to political ... Division of Budget and Accounting shall notify the ...

Budgeting, Accounting and Reporting System (BARS)

Jan 30, 2024 · Awards (Formerly Grants) Certain Grants and Other Financial Assistance (Formerly Pass-Through Grants) 3.7.2 Federal Awards – Accounting (Formerly Grants – ...

Ohio Auditor of State

villages to maintain uniform accounting practices. 3/7/2019 2 Numeric Account Code •Fund •Receipt-forrevenues •Program-forexpenditures •Object-forexpenditures ... 424 State - Pass ...

Cash Basis - Office of the Washington State Auditor

Oct 29, 2021 · Grants 3.7 Grants Accounting 3.7.1 Pass-Through Grants 3.7.2 Expenditures 3.8 Confidential Funds (Drug Buy Money, Investigative Funds) 3.8.9 Electronic Funds Transfer – ...

DOJ Grants Financial Guide - Office of Justice Programs

Mar 31, 2022 · Recipients are required to adhere to all applicable uniform (grants) administrative requirements, cost principles, and audit requirements set forth in 2 C.F.R. Part 200 and other ...

FEMA Systems FAQ

reports and interfaces with FEMA's accounting system. PMS is a tool to help draw down funds and file the Federal Financial Report (FFR) . Primary responsibilities include: Executing ...

Accounting for Fiduciary Activities -- Agency Funds & Trust

Accounting for Fiduciary Activities -- Agency Funds & Trust. 2 ... Pass-Through Grants "Grants, Entitlements, Shared Revenues "Lack of Administrative Involvement & / or Direct Financial ...

Chapter 4: POST-AWARD - HUD.gov

Requirements for pass-through entities are found in in the program regulations and 2 CFR part 200 (e.g., 2 CFR 200.332). 5. The pass-through entity must handle any non-compliance issues ...

FINANCIAL MANAGEMENT GUIDE FOR NON-PROFIT ...

General for guidance. Please note also that the pass-through funds retain their Federal identify for A-133 audit threshold determinations. SHORTCOMINGS TO AVOID Audits, evaluations and ...

California School aCCounting Manual - ocde.us

aCCounting Manual . 2008 Edition . officially approved by the . California State Board of Education . in accordance with . Education Code. Section 41010 ... Procedure 750 Pass-Through Grants ...

GOVERNMENTAL ACCOUNTING 101 - HintonBurdick

FUND ACCOUNTING Governmental accounting systems are organized and operated on a fund basis. A fund is defined as: A fiscal and accounting entity with a self-balancing set of accounts ...

State of Arizona Accounting Manual - gao.az.gov

3.8.5. The effective implementation of a pass-through entity's monitoring plan may also result in the identification of potential areas for training and technical assistance. 3.9. Pass-through ...

CALIFORNIA SCHOOL ACCOUNTING MANUAL - OCDE

The California School Accounting Manual (2016 Edition) was approved by the California State Board of Education on March 9, 2016. The members of the State Board were the following: Dr. ...

Cost Allocation Plans and Indirect Cost Rates under the ...

– Pass-through entities may, but are not required to, negotiate a rate with a proposed subrecipient who asks to do so (FAQ .331-6) 38 Subpart E Cost Principles • Modified Total Direct Costs ...

Annual Pass-Through Grant Training - Minnesota ...

DNR Pass-Through Grants Website . 5 . The Reimbursement Manual is one of the core documents this presentation is structured around, and contains the procedures you'll need ...

Cash Basis - Office of the Washington State Auditor

Awards (Formerly Grants) 3.7 Certain Grants and Other Financial Assistance (Formerly Pass-Through Grants) 3.7.2 Federal Awards (Formerly Grants Accounting) 3.7.1 Expenditures 3.8 ...

CATEGORICAL PROGRAMS - Cloudinary

• Pass through federal categorical programs: For pass through grants, the State of California is the recipient organization and the school district is the subrecipient. Pass through categorical - ...

Accounting For Pass Through Grants (2024) - x-plane.com

Accounting For Pass Through Grants and Bestseller Lists 5. Accessing Accounting For Pass Through Grants Free and Paid eBooks Accounting For Pass Through Grants Public Domain ...

Language Provisions - The Official Web Site for The State of ...

Division of Budget and Accounting: emergency disaster aid funds including grants for preventive measures; pass-through grants to political ... Division of Budget and Accounting shall notify the ...

Accounting For Pass Through Grants (Download Only)

Accounting for pass-through grants is governed by a complex web of regulations and accounting standards. Key standards include the Uniform Guidance (2 CFR 200), which provides ...

FINANCIAL MANAGEMENT GUIDE FOR NON-PROFIT ...

General for guidance. Please note also that the pass-through funds retain their Federal identify for A-133 audit threshold determinations. SHORTCOMINGS TO AVOID Audits, evaluations and ...

Training for EPA Pass-Through Grant Applicants, Recipients, ...

EPA staff work with pass-through entities to: • Include the aggregate amount for subawards in a line item in the narrative for the "Other" budget category of the Standard Form (SF) 424A, ...

Accounting For Pass Through Grants [PDF] - x-plane.com

Accounting For Pass Through Grants Uncover the mysteries within is enigmatic creation, Accounting For Pass Through Grants . This downloadable ebook, shrouded in suspense, is ...

Theodore Roosevelt Conservation Partnership, Inc.

May 3, 2021 · Pass through grants. 39,083 . 1,000 - 1,000 40,083 Professional services: Legal. 9,473 - ... The accompanying policies of the organization are in accordance with accounting ...

CALIFORNIA SCHOOL ACCOUNTING MANUAL - OCDE

Accounting Instructions for Abatement of Revenue 515-1 Items Allowable as Abatements of Revenue 515-1 Relationship of Abatements of Revenue to Revenue Control ... Procedure ...

Subrecipient Monitoring Of Federal Grants

• Pass-through entity – Reviews adequacy of their proposed plan – Issues management decision • Subrecipient: – Conforms with steps listed in the corrective action plan • Pass-through entity: – ...

Federal Grant Procedures For New Business Managers

School Audit Manual - brief summary of MDE pass through grants, including key requirements • Audit Alert issued Office of Audits • Grantor approved budget for each grant • Reimbursement ...

Auditor of State Bulletin 2020-003

Feb 27, 2020 · Governmental Accounting Standards Board Statement No. 84 – Fiduciary Activities Page 2 . Fiduciary Component Units . GASB 84 establishes criteria in paragraphs 6 ...

Accounting for the Employee Retention Credit and the Pass ...

Feb 2, 2024 · H. Accounting for Dubious ERC Claims- IRS Withdrawal Program- 2024 26. Test Your Knowledge #1 31 Solutions and Suggested Responses #1 33 III. Accounting- Financial ...

2025 LGOC Fund Accounting - ohioauditor.gov

Fund Accounting Presented by: Michelle R. Wears, CPA LGS Chief Project Manager Justin W. Sloan, CGFM ... voluntary nonexchange transactions, with the exception of pass-through ...

CALIFORNIA SCHOOL ACCOUNTING MANUAL

Accounting for Acquisition of Capital Assets 430-2 Valuation of Property and ... Procedure 750 Pass-Through Grants and Cooperative Projects Revised November 2024 750-1 . Cash ...

CALIFORNIA SCHOOL ACCOUNTING MANUAL - ocde.us

California School Accounting Manual (2013 Edition) was approved by the California State Board of Education on November 7, 2013. The members of the State Board were the following: Dr. ...

Fund Accounting for Townships Course Catalog - Ohio Auditor

Fund Accounting for Townships 2 Course Catalog • Part of a three-course session 1. Fund Accounting for Townships 2. Chart of Accounts for Townships ... with the exception of pass ...

The Devil Is in the Details: Distinguishing Subrecipient Awards ...

The distinction between subawards (pass-through grants) and procurements under grants (contracts) has been an issue in single audits conducted under Circular A-133 as far back as ...

Accounting For Pass Through Grants (PDF) - x-plane.com

Accounting For Pass Through Grants Accounting for Pass-Through Grants: A Comprehensive Guide

Author: Dr. Evelyn Reed, CPA, CGMA Dr. Evelyn Reed is a certified public accountant ...

INSTRUCTIONS FOR COMPLETING THE - hpo.nc.gov

May 10, 2024 · Total funding for CLG pass-through grants for local projects in 2024 is estimated to be approximately \$140,000, depending on Congressional action. This amount is at least ten ...

Indirect Cost Rate Questions and Answers - Office of ...

Flow-through funds: Flow-through funds (Pass-through Grants) are grants and other financial assistance received by a governmental entity (school district) to transfer to or spend on behalf ...

FISCAL POLICY AND PROCEDURES MANUAL - Alabama

Rev. 02/2024 State of Alabama Fiscal Policy and Procedures Manual P a g e | 5 2. Emergency Purchases Greater Than \$5,000.00 and Up To \$25,000 (Ala. Admin.

Library Fund Accounting - Ohio Auditor

transactions, with the exception of pass-through grants, for which the government does not have administrative involvement or direct financial involvement 16 ... • All money received by the ...

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