

APRIL 2024

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**MATERNAL AND CHILD HEALTH SERVICES BLOCK GRANT
TO THE STATES**

**State Project/Program: KENNETH C. ROYALL, JR. CHILDREN'S VISION SCREENING
IMPROVEMENT PROGRAM**

U. S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

Federal Authorization: Title 2 Code of Federal Regulations, Chapter I, Chapter II, Part 200

**State Authorization: Senate Bill 1366 of 1198, Prevent Blindness, Inc./Reporting Section
12.41**

**Section 15.33 of S.L. 1997-443; Conference Report on the
Continuation, Capital and Expansion Budgets, FY 02-03**

**N.C. Department of Health and Human Services
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SFY 2024 audit confirmation reports for payments made to Counties, Local Management Entities (LMEs), Managed Care Organizations (MCOs), Boards of Education, Councils of Government, District Health Departments and DHHS Grant Subrecipients will be available by mid-October at the following web address: <https://www.ncdhhs.gov/about/administrative-offices/office-controller/audit-confirmation-reports>. At this site, click on the link entitled "Audit Confirmation Reports (State Fiscal Year 2023-2024)". Additionally, audit confirmation reports for Nongovernmental entities receiving financial assistance from DHHS are found at the same website except "Non-Governmental Audit Confirmation Reports."

The auditor should not consider the Supplement to be "safe harbor" for identifying audit procedures to apply in a particular engagement, but the auditor should be prepared to justify departures from the suggested procedures. The auditor can consider the supplement a "safe harbor" for identification of compliance requirements to be tested if the auditor performs reasonable procedures to ensure that the requirements in the Supplement are current.

The grantor agency may elect to review audit working papers to determine that audit tests are adequate.

Auditors may request documentation of monitoring visits by the State Agencies.

This compliance supplement must be used in conjunction with the OMB 2024 Compliance Supplement which will be issued in the summer. This includes "Part 3 - Compliance Requirements," for the types that apply, "Part 6 - Internal Control," and "Part 4 - Agency Program" requirements if the Agency issued guidance for a specific program. The OMB Compliance Supplement is Section A of the State Compliance Supplement.

I. PROGRAM OBJECTIVES

The purpose of the contract with the National Society to Prevent Blindness North Carolina (NSPBNC) is to provide a certification program to train active certified vision screeners in all 100 counties. Prevent Blindness staff will collaborate with the Division of Child and Family Well-Being, Whole Child Health's Regional School Nurse Consultants in the utilization of certified screeners in local school health vision screening programs. The project utilizes recommendations from the NC Pediatric Vision Task Force Report of February 1995 and the Early Childhood Vision Commission Vision Screening Guidelines of 2007. It is recommended that all children in grades K-6 be screened each year.

In addition, NSPBNC will offer a preschool vision screening program using certified vision screeners to be implemented in 28 North Carolina counties. Prevent Blindness staff will collaborate with the Division of Child and Family Well-Being, Whole Child Health Section, and the Division of Child Development to maximize effectiveness of this screening program. The project utilizes recommendations from the NC Pediatric Vision Task Force report of 1995 and recommendations from the Child Health Committee Report of 2000. Photo-refraction is noninvasive and takes approximately one minute per child. This screening method requires no verbal response that enables children with language or developmental barriers to be screened effectively. The primary reason to screen preschool children is the detection of amblyopia (lazy eye), a potentially blinding condition that is present in approximately one out of every 20 preschool children. When caught early, loss of sight can be prevented.

II. PROGRAM PROCEDURES

The Division of Child and Family Well-Being, Whole Child Health Section has contracted with Prevent Blindness North Carolina for a statewide training and certification program for school-based vision screeners. Funds were appropriated by the 1999 General Assembly to Prevent Blindness to offer this service statewide. The project consists of a training and certification program of approximately 3 hours duration offered to participants in all 100 counties. Prevent Blindness works with county coordinators from each school system. Training is made available throughout the year. Schools are encouraged to use only certified personnel to conduct vision screening.

Prevent Blindness North Carolina (PBNC) has also contracted with the State to design and provide a second program to meet the vision screening requirements unique to preschool age children. PBNC will utilize two screeners trained in photo-refraction to conduct the screenings. Childcare centers across the State will be contacted to receive onsite vision screenings for preschoolers. Parents of the preschoolers will receive educational materials prior to the screening and will receive the actual photo and interpretation following the screening. Follow-up information will be recorded and tracked, and referral information will also be communicated back to the child's medical home.

III. COMPLIANCE REQUIREMENTS

Noted below in the following matrix are the types of compliance requirements that are applicable to the federal program. These Types are determined by the federal agency, noted as “Y,” on the “Matrix of Compliance Requirements” located in Part 2 of the OMB 2024 Compliance Supplement; however, the State Agency may have added the Type and this should be noted by “Y.” If the State determines that the federal requirement does not apply at the local level or if the State modifies the federal requirements, this is noted in the supplement under the type of compliance requirement. If the federal and/or State agencies have determined that the type is not applicable, it is noted by “N.”

If the Matrix indicates “Y,” the auditor must determine if a particular type of compliance requirement has a direct and material effect on the federal program for the auditee. For each such compliance requirement subject to the audit, the auditor must use the OMB 2024 Compliance Supplement, Part 3 (which includes generic details about each compliance requirement other than Special Tests and Provisions) and Part 4 (which includes any program-specific requirements) to perform the audit.

If there is no program listed on the “Matrix” in Part 2 or Part 4, the State has determined the Type that is applicable. If a Type is determined direct and material, the auditor should refer to the requirements found in Part 3 and listed in this supplement.

A	B	C	E	F	G	H	I	J	L	M	N
Activities Allowed or Unallowed	Allowable Costs/ Cost Principles	Cash Management	Eligibility	Equipment/ Real Property Management	Matching, Level of Effort, Earmarking	Period Of Performance	Procurement Suspension & Debarment	Program Income	Reporting	Subrecipient Monitoring	Special Tests and Provisions
Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

A. Activities Allowed or Unallowed

TRAINING FOR SCHOOL-AGE VISION SCREENERS Prevent Blindness uses contract funds to offer a certification program to train vision screeners. Prevent Blindness staff collaborates with the Division of Child and Family Well-Being, Whole Child Health Regional School Nurse Consultants in the utilization of certified screeners in local school health vision screening programs. Volunteers attending certification classes are provided with all screening materials and charts needed to conduct screenings and record results. In addition to school personnel, area nurses, health departments and family practices register to attend the courses. All certified personnel receive a certificate upon completion of the course. Certification is for two years. Screening data is collected from certified screeners in each county to track numbers screened and referred. PRE-SCHOOL VISION SCREENING Prevent Blindness certifies trainers for utilizing a vision screening method for pre-school age children. Childcare centers in thirty-four counties across the State are contacted to receive onsite vision screenings for preschoolers, ages 2-5.

The screening methodology requires the use of photo-refractive equipment with specially purchased retrofits and film specifically designed for vision research photographs. Those children requiring additional care are referred to an eye doctor. Extensive phone and mail follow-up is conducted with all referred children to ensure that they have been seen by an eye doctor. Free eye examinations and glasses will be made available to all referred children in financial need.

B. Allowable Costs/Cost Principles

All grantees that expend State funds (including federal funds passed through the N. C. Department of Health and Human Services) are required to comply with the cost principles described in the N. C. Administrative Code at 09 NCAC 03M .0201.

C. Cash Management- Not Applicable at local level.

E. Eligibility

School Age Vision Training Certification – School personnel, area nurses, health departments and family practices may register to attend the courses for training and certification for school-based vision screening. Preschool Vision Screening – The target age for preschool vision screening is children, ages 2-5, in childcare centers. Suggested Audit Procedures If the determination of eligibility is based upon an approved application or plan, obtain a copy of this document and identify the applicable eligibility requirements. Select a sample of the awards to subrecipients and perform procedures to verify that the subrecipients were eligible and amounts awarded were within funding limits.

F. Equipment and Real Property Management

The grantee has agreed to reimburse the State for any loss or damage to equipment furnished by the grantee for use in connection with the performance of his contract as specified in the contract document. The grantee has also agreed to put into place equipment controls and safeguards for equipment costing more than \$500 as specified in the contract document.

G. Matching, Level of Effort, Earmarking- Not applicable at local level

H. Period of Performance- Not applicable at local level.

I. Procurement and Suspension and Debarment

Procurement All grantees that expend federal funds (received either directly from a federal agency or passed through the N. C. Department of Health and Human Services) are required to conform with federal agency codifications of the grants management common rule accessible on the Internet at <https://www.whitehouse.gov/omb/information-for-agencies/circulars/>. All grantees that expend State funds (including federal funds passed through the N. C. Department of Health and Human Services) are required to comply with the procurement standards described in the North Carolina General Statutes and the North Carolina Administrative Code, which are identified in the State of North Carolina Procurement Manual accessible via the internet at: http://www.pandc.nc.gov/documents/Procurement_Manual_5_8_2013_interactive.pdf.

Suspension and Debarment

Non-federal entities are prohibited from contracting with or making subawards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred.

Suggested Audit Procedures

1. Test a sample of contracts and ascertain if the required suspension and debarment certifications were received for subawards and covered contracts
2. Test a sample of contracts to the List of Parties Excluded from Federal Procurement or Non-procurement Programs, issued by the General Services Administration and ascertain if contracts were awarded to suspended or debarred parties.

J. Program Income

Any fees collected must be utilized only for the continuation and expansion of direct patient services. All fees must be budgeted during the fiscal year earned or within the subsequent fiscal year. All fees brought forward from the prior fiscal year shall be expended prior to expenditure of State appropriations (10A NCAC 42H .0309).

L. Reporting

1. Financial Reporting

Contractors must submit monthly expenditure reports for reimbursement. The final monthly expenditure report is due no later than 45 days after the end of the fiscal year. All income earned and spent during each month must be reported on the monthly expenditure report (10A NCAC 42H .0309)

2. Performance Report

The contractor must submit quarterly data reports indicating the number of patients served according to race, provider's name, age groupings, etc. (10A NCAC 42H .0308).

M. Subrecipient Monitoring

The contractor shall not subcontract any of the work contemplated under this contract without obtaining prior written approval from the Division. Any approved subcontract shall be subject to all conditions of this contract. Only the subcontractors specified in the contractor's application are to be considered approved upon award of the contract. The contractor shall be responsible for the performance of any subcontractor.

N. Special Tests and Provisions

Conflict of Interest and Certification Regarding Overdue Tax Debts All non-State entities (except those entities subject to the audit and other reporting requirements of the Local Government Commission) that receive, use or expend State funds (including federal funds passed through the N. C. Department of Health and Human Services) are subject to the financial reporting requirements of G. S. 143C-6-23 for fiscal years beginning on or after July 1, 2007. These requirements include the submission of a Conflict-of-Interest Policy (see G. S. 143C-6-23(b)) and a written statement (if applicable) completed by the grantee's board of directors or other governing body that the entity does not have any overdue tax debts as defined by G. S. 105-243.1 at the federal, State or local level (see G. S. 143C-6-23(c)). All non-State entities that provide State funding to a non-state entity (except any non-State entity subject to the audit and other reporting requirements of the Local Government Commission) must hold the subgrantee accountable for the legal and appropriate expenditure of those State grant funds.

Audit Objective – Determine whether the grantee has adopted and has on file a conflict-of-interest policy, before receiving and disbursing State funds.

Suggested Audit Procedures

1. Ascertain that the grantee has a conflict-of-interest policy.
2. Check the policy and verify through board minutes that the policy was adopted before the grantee received and disbursed State funds.