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NOVEMBER 25, 2025

Update on Delayed Release of Final 2025 OMB Compliance Supplement (Update to blog post published October 16, 2025)

Note: This post has been updated to reflect the Nov. 25 release of the 2025 OMB Compliance Supplement.

The recent federal government shutdown caused a significant delay in the release of the final Office of Management and Budget (OMB) Compliance Supplement for 2025. The supplement was released Nov. 25, 2025, and <u>can be viewed on the OMB website</u>

(https://www.whitehouse.gov/omb/information-resources/guidance/compliance-supplement/?

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LGC staff are aware of the impact of this delay for local governments and public authorities in North Carolina as it relates to completion and submission of their FY 2025 audits. With these circumstances in mind, the following adjustments have been made to the FY 2025 audit submission timeline:

- FY 2025 Audit Reports not subject to Single Audit requirements are still due six months
 after fiscal year end (December 31 for units with a June 30 fiscal year end). An auditor
 may submit an audit performed under State Single Audit requirements if the auditor
 believes the final OMB 2025 Compliance Supplement will not have an impact on the
 audit submitted.
- For units with a June 30, 2025, fiscal year end that are subject to Single Audit requirements, FY 2025 audited financial statements will be considered timely if submitted within 6 months **plus 43 days** from fiscal year end **(February 12, 2026)**.
- Units planning to take advantage of this due date change **must** provide a contract amendment to LGC staff on or before January 1, 2026. The reason for the amendment should be listed as "Other Late Release of 2025 Compliance Supplement," and the submission date listed on the amendment should be no later than February 12, 2026.
- For units with amendments on file by January 1, 2026, the date that triggers an FPIC will be adjusted to February 13, 2026.
- Units requesting approval for debt financings at the January, February, or March 2026
 LGC meetings that are unable to timely submit their audits **solely due to the delayed**release of the OMB Compliance Supplement should send a draft audit directly to the
 Director of Fiscal Management (Kendra.Boyle@nctreasurer.com
 (mailto:Kendra.Boyle@nctreasurer.com)). Do not upload the draft audit to LOGOS or the
 LGC File Transfer Portal. Each page of the draft audit should be marked "DRAFT," with the
 assurance that there will be no changes to the financial information between the draft
 and the eventual final audit.

In addition, the unit will need to complete a Data Input Report (DIR) in the LOGOS Audit Module based on the information in the draft audit. Both the draft audit and the DIR must be available to LGC staff at least two months prior to the LGC meeting at which the unit's debt application will be considered.

Please note that the invoice approval process will not change. In addition, other entities may have separate filing deadlines or requirements that are unaffected by the delayed release of the OMB Compliance Supplement. The changes described here apply only to the submission of audited financial statements to LGC staff for units with a June 30 fiscal year end that are subject to Single Audit requirements.

Lastly, units are advised that the <u>dates associated with Notices of Noncompliance and withholding of sales tax distributions (https://www.nctreasurer.gov/session-law-2023-59-act-increase-compliance-counties-and-municipalities-fail-timely-submit-annual) for counties and municipalities that have not submitted audits are set in <u>North Carolina General Statute 159-34 (https://ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_159/GS_159-34.pdf)</u> and remain unchanged.</u>

Counties and municipalities that do not submit an audit by April 1 **will** receive a Notice of Noncompliance per G.S. 159-34(e), and those that do not submit an audit by July 1 **may** have a portion of their sales tax distributions withheld per G.S. 159-34(g).

A link to the final 2025 OMB Compliance Supplement is available on our <u>State Compliance Supplements</u> (https://www.nctreasurer.gov/2025-state-compliance-supplements#OMBUniformGuidanceComplianceSupplement-4699) webpage.