



November 20, 2025

To the Honorable Commission Board Members  
Northern Virginia Transportation Commission  
Arlington, Virginia

In connection with our audit of the financial statements of the Northern Virginia Transportation Commission (Commission) for the year ended June 30, 2025, we have the following comments and suggestions for your consideration.

***OMB Guidance for Grants and Agreements***

In April 2024, the United States Office of Management and Budget (OMB) issued a comprehensive revision to the OMB Guidance for Grants and Agreements, now titled the OMB Guidance for Federal Financial Assistance. This update represents the most significant overhaul of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly referred to as the “Uniform Guidance”) since its original release in 2013.

The revised guidance, codified in 2 CFR Part 200, becomes effective for federal awards issued on or after October 1, 2024. Federal agencies may elect to apply the guidance to awards issued prior to this date, but are not required to do so.

Key changes include:

- **Cybersecurity Requirements:** Entities receiving federal financial assistance must now implement appropriate cybersecurity measures to safeguard data and systems.
- **Threshold Adjustments:** Increases to the de minimis indirect cost rate, audit threshold, and Type A program threshold aim to reduce administrative burden.
- **Procurement Standards:** Clarifications and updates to procurement requirements, including micro-purchase and simplified acquisition thresholds.
- **Subrecipient Monitoring:** Enhanced expectations for oversight and documentation of subrecipient activities.
- **Plain Language and Accessibility:** The guidance has been rewritten to improve clarity and reduce ambiguity, making it more accessible to recipients and stakeholders.

We recommend that the Commission take proactive steps to ensure compliance with the revised guidance. Specifically, the Commission should:

- Review all existing federal awards to determine applicability of the new guidance, especially for awards issued on or after October 1, 2024.
- Conduct a gap analysis of current policies and procedures against the revised requirements, including cybersecurity, procurement, and subrecipient monitoring.
- Update internal policies and procedures to reflect the new thresholds and standards.

- Engage with granting agencies to clarify expectations and confirm applicability of the revised guidance to current and future awards.
- Communicate whistleblower protections and other compliance-related updates to employees and subrecipients.
- Train relevant staff on the new requirements and ensure documentation practices align with the updated standards.

These actions will help the Commission maintain compliance and reduce risk under the new federal framework.

### ***New GASB Pronouncements***

As of June 30, 2025, the Governmental Accounting Standards Board (GASB) had issued several statements not yet implemented by the Commission. The statements which might impact the Commission are as follows:

#### **GASB Statement No. 103, *Financial Reporting Model Improvements***

This Statement will improve key components of the financial reporting model to enhance its effectiveness in providing information that is essential for decision making and assessing a government's accountability.

Statement No. 103 will be effective for the Commission beginning with its year ending June 30, 2026.

#### **GASB Statement No. 104, *Disclosure of Certain Capital Assets***

This objective of this Statement is to provide users of government financial statements with essential information about certain types of capital assets. This statement requires certain types of capital assets to be disclosed separately in the capital assets not disclosures required by Statement 34. Lease assets recognized in accordance with Statement No. 87, *Leases*, and intangible right-to-use assets recognized in accordance with Statement No. 94, *Public-Private and Public-Public Partnership and Availability Payment Arrangements*, should be disclosed separately by major class of underlying asset in capital assets note disclosures. Subscription assets recognized in accordance with Statement No. 96, *Subscription-Based Information Technology Arrangements*, also should be separately disclosed. In addition, this Statement requires intangible assets other than those three types to be disclosed separately by major class.

Statement No. 104 will be effective for the Commission beginning with its year ending June 30, 2026.

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This communication is intended solely for the information and use of management, Board Members and others within the Commission and is not intended to be and should not be used by anyone other than these specified parties.

If you have any questions concerning any of these items or if we may be of further assistance, please contact us. We thank you for the opportunity to conduct your audit for the year ended June 30, 2025 and express our appreciation to everyone for their cooperation during this engagement.

*PBMares, LLP*

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