

Flint Hills Regional Council Grant Management Policy

FLINT HILLS
REGION

April 2023

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**Flint Hills Regional
Council
Grant Management Policy
Adopted
April 2022**

I. BACKGROUND INFORMATION

A. Flint Hills Mission

The Flint Hills Regional Council, Inc. (the “Council”) is a voluntary nonprofit organization of local governments, serving multiple member jurisdictions. The Council is the administrator of the Flint Hills Economic Development District (FHEDD), as designated by the Economic Development Administration (EDA). The FHEDD consists of a seven-county area including Chase, Geary, Lyon, Morris, Pottawatomie, Riley and Wabaunsee counties. The Council’s mission is to enhance the economic viability and improve the quality of life through regional collaboration in the Flint Hills.

The Council works to capture external dollars to support and benefit the region. As an official economic development district the Council has access to non-competitive funding from the EDA to implement the FHEDD’s regional economic development plan and competes for other funding as opportunities are identified.

Working collaboratively throughout the region, the Council provides community planning, grants, and technical assistance to members. Issues where collaboration and cooperation can be beneficial include: community development projects; workforce capacity with skills required for today’s jobs, public health and access to quality healthcare and mental health services, emergency services, and enhancing opportunities for economic growth while reversing negative impacts (e.g., population loss). . Addressing and impacting these issues is aided by communities that engage in cooperation and coordination. The Council exists to ensure the region is globally competitive and relevant while preserving and providing a high quality of life.

B. Policy Purpose

The Grant Management Policy (the “Policy”) is intended to establish guidelines for application, approval, implementation, reporting, and management of federal, state, and local grants. Although the grants are applied to various purposes and come from various sources, all grants must be properly researched, applications submitted, and their administration monitored. All administration and reporting must comply with granting entity requirements as dictated in grant guidelines and the Code of Federal Regulations (CFR).

This Policy will describe the procedures as follows:

- Preapplication Assessment Considerations.
- Grant Application Review and Approval Procedure.
- Award Notification and Acceptance Procedure.
- Legal Review Procedure.
- Implementation Plans.
- Grant Reporting and Accounting Procedures.
- Grant Closing Procedure.
- Subrecipient Monitoring.
- Document Retention Policy.

C. Scope

Grant funds are administered according to federal and state laws and regulations, grantor guidelines, and the Council’s Board of Directors. Governance of grant awards are disclosed in the federal and state laws and policies listed below. This list is not intended to be a complete listing of all processes and procedures, rules, regulations, or laws relating to federal funds management. Each award should be examined for additional governance within the agency or program issue.

Federal

- Federal Grant and Cooperative Agreement Act of 1977, 31 U.S.C. § 6304 et. seq.
- Office of Management and Budget, Uniform Administrative Requirement, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. Pt. 200 et. seq.
- Office of Management and Budget, Circular A-133

- Equal Employment Opportunity Program, Policy Against Discrimination, Harassment, and Retaliation
- Title VI, Nondiscrimination Plan

Kansas

- Kansas Administrative Regulations, K.S.A. § 77-415 et. seq.
- Kansas Uniform Grant Guidance, <https://admin.ks.gov/offices/accounts-reports/state-agencies/finance/single-audit/uniform-grant-guidance>.

D. General Responsibility by Position

a. Board of Directors

- i. Assess, evaluate, and prioritize district funding needs.
 1. Work with the Executive Director to identify region wide opportunities presented by public funding sources, private foundations, and partnerships with other organizations or agencies.
 2. Maintain the Needs Assessment System and as funding opportunities are identified, determine the most appropriate entity to pursue the funding opportunity, if deemed feasible (Council staff, member jurisdiction staff, or other).
 3. Identify the source of any cash and/or in-kind match contribution that may be required of the grant.
- ii. As required by the Board or other entities, the President and Treasurer must sign official documents in conjunction with the Executive Director, such as loan and grant extension agreements or other documents.
- iii. At the regularly scheduled monthly board meetings, review grants and grant management at all stages of the process.
- iv. The Board must designate a signatory for approved Council resolutions and policies. If no signatory is designated, the responsibility shall fall to the Executive Director and the Board President.
- v. If the Executive Director position is vacant:
 1. The Board President must serve as the authorized official of the Council, assuming the authority that the Executive Director would otherwise serve as
 - outlined by resolution, and
 - approved by the Board of Directors.
 2. These duties include but are not limited to:
 - representing the Council to the public, the media, and our partners,

- serving as the authorized signatory to sign and submit grant applications, certifications, agreements, amendments, reports, and draws,
 - contracting for services, and
 - conducting all banking business, loan extensions and bank checks.
3. The Treasurer serves as an additional authorized signatory to sign financial-related documents, including financial reports, draws, contracts for services, banking business, loan extensions, and bank checks.
- b. Executive Director.
- i. Act on behalf of the Council as the “Authorized Official” on all grants.
 - ii. Review potential funding opportunities that align with regional needs.
 - 1. If those opportunities are feasible and favorable to the Council and/or member jurisdictions, the Executive Director presents details of funding opportunities to the Board to seek approval to pursue application and accept if awarded or otherwise pass along to the most appropriate entities to consider.
 - iii. Confirm source of required match funding and seek formal authorization from entity providing match funding.
 - iv. Confirm ability to comply with all requirements of the grant funding terms and conditions.
 - v. Review and submit grant applications as the Council’s authorized official.
 - vi. Reconfirm ability of the Council to comply with all grant award terms and conditions and execute grant agreement should funding be awarded.
 - vii. Ensure required cash match funding is deposited within the grant fund prior to the start of the grant period and prior to any expenditures related to the grant.
 - viii. Review and sign off on financial and performance reports.
 - ix. Confirm and reconcile grant expenses and grant budgets with Grant Managers.
 - x. Submit plans and proposals to Board for review and input.
 - xi. Attend monthly Board meetings and keep the Board updated on all grant scope implementation progress and grant budgets, to include at least:
 - 1. budget details by line item,
 - 2. federal/state/private foundation grant balance,
 - 3. match cash and/or in-kind contribution balances, and
 - 4. overall total balance.
 - xii. Ensure staff are prepared for site visits and audits for each grant assigned, at any given time.
 - xiii. Monitor, maintain, and update SAM and DUNS accounts yearly, with renewals due each December.
 - xiv. Perform Grant Manager functions as needed.

c. Grant Manager

i. *Research*

1. Research potential projects and present at staff meetings. Take note of the key basics of the grant, the project goals, the Council’s eligibility, and whether a grant has match requirements.
2. If a grant opportunity is ultimately approved by the Board, prepare the application and supporting documents. Prepare the grant budgets with an eye towards match requirements, and costs that are and are not reimbursable under the grant.
3. Prepare a staffing plan detailing each staff member that will be working on the grant with the associated salary amount and fringe amount per staff member anticipated necessary to implement the grant. This will serve as support documentation for any salary funding being requested in the overall grant budget.
 - Any indirect cost must be applied consistently across all grants being administered by the Council.

ii. *Implementation and Reporting*

1. Provide approved grant budgets to Accountant and request the creation of a new grant fund and sub accounts for all financial activities related to the grant.
2. Ensure cash match is deposited to newly established grant fund prior to the grant period start date and prior to expending any grant dollars.
3. If the grant is a multi-year grant that is awarded annually, ensure reconciliation and financial close-out at year-end. Provide Accountant with
 - next year’s approved grant budget,
 - any cash match deposit to support the new year’s match requirement prior to the start date of the new grant year (if collected annually, such as with the EDA Partnership Planning Grant.)
4. Complete special conditions and any required training required of the grant prior to expending grant funding.
5. Develop implementation work plans.
6. Host subrecipient kick-off meeting to discuss grant requirements and draft subrecipient agreements.
7. Execute subrecipient agreements prior to any expenditures related to the subrecipient portion of the grant budget.
8. Gather and reconcile expense reports versus grant budgets from the program, partners, and subrecipients.
9. Prepare programmatic and financial reports for review by Executive Director within submission deadlines.
10. Maintain communications with any partners or subrecipients under the grant project.

11. Monitor expenditures and activities.
12. Conduct subrecipient site visits to ensure compliance.
13. Identify and investigate any issues with management of grants.
14. At the conclusion of the program or project, make sure files are appropriately closed out and marked for retention as required by grant terms.
15. Maintain accurate files (in FHRC G drive or official file storage) in accordance with the Document Retention Policy and any additional terms of the grant award. If the terms of the grant and the Document Retention Policy are in conflict, defer to the terms of the grant.

d. Accountant

- i. Assist in providing data necessary for staff to prepare accurate grant budgets and monthly grant reconciliations for awarded funds.
- ii. Review financial reports prepared by staff to ensure accuracy as a second review prior to submission to the Executive Director for review and submission.
- iii. Work with the Executive Director to ensure grant management and daily operations do not exceed financial abilities of the Council.
- iv. Journal entry funding from grant fund to General Fund after draw downs to reimburse indirect costs as requested per draw down.
- v. Develop monthly financial reports for the Board, detailing each grant fund.

II. GRANT MANAGEMENT POLICY OPERATIONAL GUIDELINES

A. Pre-Award Phase

- a. Preapplication Assessment Considerations. When considering potential grants, the Grant Manager and Executive Director must assess the Council’s ability to administer the grant. Use the following considerations to guide research and begin constructing a plan for administration.
 - i. *Programmatic Considerations.*
 - Eligibility for the grant.
 - Alignment with Council’s mission.
 - Alignment with Council’s strategic priorities and needs as identified, submitted, and prioritized
 - Provision for or expansion of services required.
 - Council's capacity to administer the programmatic and administrative aspects of the grant.
 - Existing relationships with partners or subrecipients.
 - ii. *Financial Considerations.*
 - Total anticipated project cost.
 - Match requirements and sources of funding to meet the match requirement based on entities or organizations that would benefit from the grant if awarded.
 - Consider if multiple partners may be able to provide portions of the match to create a combined match source. .
 - Types of program expenditures expected.
 - Direct cost items, including salaries, supplies, equipment, travel, contractual costs, membership fees, conference registration fees, etc.
 - Eligible indirect costs as outlined in CFR 200, consistent across all grants.
 - Indirect costs that will not be recouped in the grant award.
 - This may include property, liability, or other insurance requirements for the project.
 - This may also include staffing costs like salary and benefits increases for multi-year grants.
 - Continuation plans if funding is reduced or terminated.
- b. Grant Proposal Review and Approval Procedure.
 - i. Once the application is prepared, it must be submitted to the Executive Director for review. The Executive Director must ensure the application:
 - i. aligns with a Council priority,
 - ii. meets Council expectations of document quality,

- iii. has available matching funds if required, and
- iv. that any processes for continuing the program or project after funding has terminated have been fully and realistically assessed.
- ii. After review, the application must be submitted to the Board for final approval. The Grant Manager and Executive Director must present the application no later than seven days before the submission deadline. This can be waived if the timeline and workloads are too pressing.
- iii. The Board must review the application for accuracy, document quality, alignment with Council mission, and ability of Council to administer the grant as laid out in the application.

B. Award Phase

a. Award Notification and Review Procedure.

- i. The Grant Manager, in partnership with the Executive Director, must assess the Notice of Award, and note
 - if funds have been reduced from the amount requested in the application.
 - if factors have changed since the preapplication assessment.
 - whether the goals, objectives, and evaluative components can still be accomplished within the prescribed timeframe set by the grantor.
 - whether partners or subrecipients are still able to implement the grant.
- ii. If award terms require amendment before the award can be accepted, the Grant Manager must negotiate with the grantor and obtain the amendments in writing.
- iii. The Grant Manager and Executive Director are responsible for reviewing the final grant award. Once the Executive Director approves the final grant award, they must sign and submit the award agreement, serving as the Council's acceptance.
- iv. After submitting the Council's acceptance, the Grant Manager must update the grant's file with a copy of the Notice of Award and approved budgets.

b. Legal Review Procedure.

General Counsel shall conduct a legal review of the grant agreement to assess whether the terms and conditions of the agreement are legally enforceable and ensure the Council's interests are protected prior to the acceptance of grant awards within three business days of the award notification.

- i. If the legal review identifies any potential legal issues stemming from the terms and conditions of the agreement, the Grant Manager must contact the grantor to resolve the issue.
- ii. If a resolution cannot be reached, the Grant Manager must obtain authorization from the Executive Director and prepare a letter to the grantor to decline the award. The

Grant Manager should provide a copy of the letter to the Executive Director and the Board. The letter should express the Council's regret in declining the award and clearly articulate the specific reason(s) the award is being declined.

- iii. If the legal review identifies no potential legal issues stemming from the terms and conditions of the agreement, the Executive Director is authorized to accept the award by signing the award agreement and submitting to the funding agency.

C. Post-Award Phase.

a. Implementation Plans.

- i. Grant Managers must develop a working implementation plan to submit to the Executive Director within 15 days of award acceptance.
- ii. The grant implementation plan shall have the following elements:
 - a project schedule, to include reporting deadlines, expected programmatic milestones, and grant closing dates.
 - activities and their estimated completion dates.
 - roles and associated responsibilities.
 - procurement plan and timelines for anticipated expenditures (RFP schedule, etc.).
 - measurable objectives, the metrics used to measure them, and the anticipated completion date.
 - fields to enter actual costs, completion dates and objective metrics.

b. Grant Reporting and Accounting.

i. Reporting Procedure.

- Grant Managers must prepare timely and accurate progress or programmatic reports.
 - Note actual or anticipated problems and areas where technical assistance may be necessary.
- Grant Managers must submit programmatic reports to the Executive Director. The Executive Director must review for content and quality and address any issues with the Grant Manager. Upon satisfaction with the report, the Grant Manager will submit reports to the grantor and retain a copy in the grant file.

ii. Accounting Procedure

- The Grant Manager must maintain all supporting documentation related to grant expenditures, including the completed and signed Purchase Authorization form, all Request for Proposal materials (including the RFP, all proposals received, the Committee Score Sheet, and scoring methodology/matrix), invoices, receipts, etc.

- The Grant Manager must reconcile the grant funds monthly. The Grant Manager must monthly review the submitted invoices and remaining award amount to track the rate of spending.
- The Grant Manager must submit all financial reports, grant budget adjustments, and reimbursement requests to the Executive Director and Accountant for review and approval before submission to the grantor.
- The Executive Director and Accountant must review the financial reports for content and quality and may collaborate with the Grant Manager on any issues.
- Once the financial reports have been reviewed, the Executive Director must approve for submission to the grantor. The Grant Manager must retain a copy of the report in the grant’s file on the FHRC Google drive .

c. Grant Closing Procedures.

- i. Once all invoices and expenditures have been received, paid and reconciled, the Grant Manager must alert the Accountant to place the grant fund in no-posting status.
- ii. The Grant Manager must perform a final audit of final invoices and prepare the final financial report and final programmatic report. The final reports must be submitted to the Executive Director for review and approval prior to submission.
- iii. The Grant Manager must prepare a memorandum to the Executive Director identifying the name of the grant to be closed, the grant award number, the final disposition of grant funds and assets, the objectives achieved, and the document retention schedule for the grant files per funding agency requirements.
- iv. After review of the memorandum, the Accountant must update the Council budget and confirm the grant closeout with the Executive Director.
- v. The Grant Manager must retain a copy of all final documentation and the memorandum in the grant file.
- vi. The Grant Manager must review the Council’s file saving system and records to ensure all documentation is saved electronically, and any hard copy files should be stored at the Council office, clearly marked with the appropriate retention dates.

D. Subrecipient Monitoring.

a. Pre-Award Phase.

- i. The Grant Manager must perform a search on SAM.gov to determine if the subrecipient has been debarred or excluded from doing business with the federal government. Print the screen shot of the SAM.gov search for the grant file.
- ii. The Grant Manager must review subrecipient’s Annual Comprehensive Financial Report (“CAFR”) if applicable.

- iii. The Grant Manager must complete Attachment 1 “Award Stage Subrecipient Risk Assessment” and keep in the grant file.
- b. Award Phase.
- i. Complete attached Subrecipient Monitoring Form and retain in the grant file. The form identifies federal award information for the subrecipient, including
 - Award name, number, and date.
 - Subrecipient name and DUNS number.
 - Start and end date for the sub award period of performance.
 - Amount of funding obligated to the subrecipient.
 - Total amount of award to the Council.
 - Award project description.
 - CFDA number.
 - All requirements imposed by the prime recipient on the subrecipient to comply with federal statutes, regulations, and the terms and conditions of the grant award
 - Appropriate terms and conditions concerning closeout of the sub award.
 - ii. The Grant Manager must pass down applicable special conditions of grant award. The Grant Manager must acquire and retain subrecipient’s acknowledgement of receipt of, and agreement to comply with, the special conditions.
 - iii. The Grant Manager must provide Attachment 2 “Requirements of Sub Award Documentation” to the subrecipient before any expenditures are made.
- c. Post-Award Phase
- i. *Internal Controls.* (2 CFR 200.303) – ensure the subrecipient provides reasonable assurance of subrecipient compliance with federal statutes, regulations, and the terms and conditions of the federal award.
 - Subrecipient must return signed acknowledgement of the terms and conditions of the sub award to the Grant Manager, if applicable.
 - Subrecipients must agree to evaluation and monitoring of their compliance with statutes, regulations, and terms and conditions of the sub award by allowing access to the subrecipient records and financial statements, and the performance of onsite reviews of the subrecipient’s program operations.
 - Subrecipient must take prompt action when instances of noncompliance are identified.
 - Subrecipient must take reasonable measures to safeguard sensitive information consistent with applicable federal, state, and local laws.
 - Subrecipient must participate in programmatic reporting training, when available.
 - ii. *Reporting Procedure.*
 - The Grant Manager must monitor quarterly programmatic progress and the ability of the subrecipient to meet objectives of the sub award.

- The Grant Manager must perform [annual] subrecipient site visits.
- The Grant Manager must follow up with subrecipient regarding findings from site visits and request the subrecipient’s resolution of the site visit findings.
- The Grant Manager must coordinate with the subrecipient to complete financial and programmatic reporting.

iii. *Accounting Procedure.*

- The Grant Manager must review and record all subrecipient invoices.
- Invoices must be submitted along with the completed Council’s Request for Reimbursement form. They must be submitted in a timely manner (based on deadlines established during the kick-off meeting), accurate, and contain the appropriate backup documentation to support the expense.
- For questionable expenses, the Grant Manager must request additional information or documentation from the sub-recipient within [two] days of invoice receipt, and prior to any payment.
- If backup documentation cannot be provided, or if an ineligible expense was submitted as part of a request for reimbursement, the Council will not reimburse for the expense.
- The Grant Manager must reconcile the subrecipient’s financial reports with submitted invoices and the remaining sub award amount after expenses. The Grant Manager must monitor the rate of spending and ensure cumulative expenses do not exceed the total sub award amount.
- [The Grant Manager must review subrecipient expenditures with Attachment 4 “Sub Award Monitoring Checklist” monthly.]

d. Subrecipient Closing Procedures.

- i. The Grant Manager will establish a deadline for all subrecipient funding to be expended and invoices paid as a part of the subrecipient agreement terms and conditions. This will include a deadline for any liquidation period, if applicable.
- ii. The subrecipient agreement will provide a deadline for the subrecipient to provide confirmation via email that subrecipient will spend the entire sub award and liquidate all encumbrances, or in the alternative if the subrecipient anticipates de-obligating funding to be assessed for potential use for other eligible expenses prior to the grant end date, or for the Council to notify the funding agency that funding may be be-obligated back to the agency.
- iii. The subrecipient must submit all final invoices to the Grant Manager along with a final financial report that shows sub award amount, all invoices reimbursed by the grant, and the amount remaining in sub award.
- iv. The Grant Manager must complete the final programmatic report during the last quarter of the grant period.

- v. The Grant Manager must obtain the following documents from the subrecipient to close out the grant:
 - Final invoices.
 - Final financial report.
 - Final programmatic reports.
 - All correspondence.
 - Final supplies and equipment report
- v. The Grant Manager will perform a final audit of final invoices, final financial reports, and final programmatic responses and, if necessary, may request additional supporting documentation.

E. Document Retention Policy.

a. Grant File Management Procedure.

- i. The Grant Manager must maintain the grant files, and include copies of all grant management materials, including grant proposals or applications, Notices of Award, memoranda of understanding, contracts, financial and programmatic reports, procurement documentation, timesheets, in-kind timesheets, correspondence, requests for reimbursements, etc.
- ii. The Grant Manager must maintain a file structure that include the following sections, with clear separations between different grant years, unless otherwise directed by the grantor:
 1. Application or Proposal (e.g., application guidance, a copy of the application and research including statistical information used in preparation of and support of the grant, match commitment letters, etc.).
 2. Award Documents (e.g., award letter, Board agenda item, grant agreement, notification of completing all special conditions and related support documentation and permission from funding agency to begin expending funds from the grant, grant amendments, modifications, extensions, cancellations and terminations and anything else related to the award).
 3. Financial Reports (e.g., account set up, monthly reconciliation reports, contracts, purchase orders, invoices, reimbursement requests, purchase authorization forms, RFP proposals, RFP score sheets, RFP scoring matrix, etc.).
 4. Programmatic Reports (e.g., reports to grantor and evaluation components).
 5. Scope Deliverables / Project Files
 6. Subrecipient Agreements and Monitoring

7. Site Visit and Audit

b. File Retention Procedure.

- i. The Council must maintain its grant records for the period of time specified by each funding agency following the closure date of the grant award. If any litigation, claim, negotiation, audit, or other action involving grant records has been started before the expiration of the specified period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the specified retention, whichever is later.
- ii. Notwithstanding the previous statement, Grant Managers must comply with any retention requirements specified by each grantor.
- iii. Retention requirements extend to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, cancelled checks, and related documents and records.
 1. Source documents include copies of all awards, applications, and required recipient financial and narrative reports.
 2. Personnel and payroll records include time and attendance reports; personal activity reports or equivalent documentation for all individuals reimbursed under the awards.
- iv. Grant Managers must reasonably protect records against loss, theft, fire, or other damage in accordance with statutory provisions. All work product and grant documents to be stored on FHRC Google drive daily.

Attachment 1

Award Stage Subrecipient Risk Assessment - Checklist

_____ Performed search of SAM.gov for debarment/exclusion.

_____ Reviewed single audit (CAFR) of subrecipient organization

_____ Reviewed subrecipient single audit (CAFR) recommendations and findings to determine timely and effective resolutions and corrections by subrecipient organization

_____ Issued grant award special conditions to subrecipient and received acknowledgement from the subrecipient of receipt and agreement for compliance to grant special conditions

Based on my review and subrecipient’s past performance, this subrecipient is determined to be

Low Risk

Medium Risk

High Risk

Grant Manager

Date

Attachment 2

Requirements of Sub Award Documentation

Requirements of sub award documentation to be submitted by subrecipient:

1. Copy of signed Sub Award Agreement.
2. Signed acknowledgement of receipt of grant award special conditions and agreement to comply with grant award special conditions, if applicable.
3. Financial and progress reports as outlined in the Sub Award Agreement.
4. At grant closeout, within the time frame defined by the prime grantee:
 - a. Final invoice(s)
 - b. Final Financial Report
 - c. Final Programmatic Report
 - d. Final Supplies and Equipment report (see *Attachment 5 for example*)

By signing below, I agree to provide all documents listed above, and additional documentation if needed, to the prime grantee by the date requested by the prime grantee.

Sub-awardee Representative

Date

Attachment 3

SUBRECIPIENT MONITORING FORM

This form will be considered valid for three (3) years from the date of signature by your organization’s Authorized Official.

SECTION A: SUBRECIPIENT INFORMATION	
Legal Name:	DUNS #:
Organization’s Address (Include ZIP):	Congressional District:
Performance Site Address (if different from above):	Congressional District:
What is the subrecipient’s classification? (Check only if applicable): <input type="checkbox"/> Large Business <input type="checkbox"/> Veteran-Owned <input type="checkbox"/> Small Business <input type="checkbox"/> Government Entity <input type="checkbox"/> Tribal <input type="checkbox"/> Historically Black College/University <input type="checkbox"/> Historically Underutilized Business Zone <input type="checkbox"/> Woman-Owned <input type="checkbox"/> Small Disadvantaged Business <input type="checkbox"/> Volunteer Organization <input type="checkbox"/> Minority Institution/Owned	
Domestic Organizations: Federal Employer Identification Number Registered in CCR? <input type="checkbox"/> Yes <input type="checkbox"/> No Expiration Date: _____ Cage Code:	International Organizations: NAIS Code: NCAGE Code:

Executive Compensation (complete when collaborating on a U.S. Federal project only):

Yes No During the previous fiscal year my organization received eighty percent (80%) or more of its annual gross revenues in federal awards AND twenty-five million dollars (\$25M) or more in annual gross revenues from federal awards.

Yes No My organization regularly reports information on the compensation of its senior executives in response to section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78(d) or Section 6104 of the Internal Revenue Code of 1986.

Name of Subrecipient Project Director/PI (Required): _____

Phone: _____ Email: _____

Amount of Funding Requested by Subrecipient: \$ _____

Cost Sharing Provided By Subrecipient (if applicable): \$ _____

SECTION B: SUBRECIPIENT ELIGIBILITY AND CERTIFICATIONS

1. Please answer the following questions BEFORE completing the rest of the form.

- Yes No Is your organization presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in any Federal department or Agency?
- Yes No Is your organization delinquent on repayment of any Federal debt including direct and guaranteed loans and other debt as defined in OMB Circular A-129, “Managing Federal Credit Programs”?

2. Lobbying (for U.S. Federal projects only):

- Yes No My organization certifies that no payments have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this proposed project. (If “No,” attach an explanation).

3. Additional Debarment and Suspension Information (check as applicable):

- Yes No Is the project director (or any other employee planning to participate in this project) debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities? (If “yes,” attach an explanation.)
- Yes No Is the organization presently indicted for, or otherwise criminally or civilly charged by a government entity? (If “yes,” attach an explanation.)
- Yes No Has the organization within three (3) years preceding this offer had one or more contracts terminated for default by any federal agency? (If “yes,” attach an explanation.)

4. Audit Status / Fiscal Responsibility

- Yes No Does your organization receive an annual audit in accordance with OMB Circular A-133?

If “Yes” please provide a link:

If “No” please indicate why your organization is not subject to A-133 audit requirements:

- My organization is a non-profit that expended less than \$500,000 in U.S. Federal funds during our previous fiscal year.
- My organization is a foreign entity.
- My organization is a for-profit entity.
- My organization is a U.S. government entity.

If “Yes” respond to the following:

- Yes No Has your organization’s A-133 audit has been completed for the most recent fiscal year?
- Yes No Were there any findings or exceptions noted? If “Yes”, attach an explanation.

5. Does the Subrecipient have a formal, written personnel policy that addresses the following:

- | | | |
|--------------------------------------|------------------------------|-----------------------------|
| Pay Rates and Benefits | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Time and Attendance | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Leave | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Discrimination | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Federally Approved Travel Policy | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Federally Approved Purchasing System | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

SECTION C: AUTHORIZED REPRESENTATIVE APPROVAL

APPROVED FOR SUBRECIPIENT

The information, certifications and representations above have been read, signed and made by an authorized official of the Subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of agency policy in regard to sub awards and are prepared to establish the necessary inter-institutional agreements consistent with those policies. Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the Subrecipient’s own risk.

Signature of Subrecipient’s Authorized Official

Date

Attachment 4

Sub Award Monitoring Checklist

Below is a sub award monitoring checklist that satisfies administrative, financial, and programmatic elements of a site visit.

_____ Is Prime Recipient in receipt of signed Memorandum of Understanding (MOU), signed acknowledgement of grant special conditions, and signed ‘Requirements of Sub Award Documentation’ from subrecipient’?

_____ Are the lists of invoices paid under each federal grant and corresponding list of equipment/supplies to be reviewed during the annual site visit provided to subrecipient?

_____ Are invoices from subrecipient delayed, inconsistent, lacking sufficient backup or improperly documented?

_____ Do the subrecipient’s invoices support the goals and objectives of the grant?

_____ Does subrecipient submit a financial report each quarter that lists invoices paid by the sub award and the sub award’s remaining balance?

_____ Does subrecipient submit information required for quarterly programmatic progress reports?

_____ Is the subrecipient’s rate of spending appropriate for their progress?

_____ Has the subrecipient provided a list (inventory) of supplies and equipment purchased with grant funds?

_____ Is programmatic performance progressing in an expected manner to support the goals and objectives of the grant?

_____ Are there severe programmatic or administrative issues which will lead to the sub award being terminated?

_____ Does the subrecipient respond timely to requests for financial, programmatic, budget/scope revision information?