

Governor's Office*of* PLANNING AND BUDGET

THE STATE OF GEORGIA

Grantee Onboarding

Capital Projects Fund Grant January 26, 2023

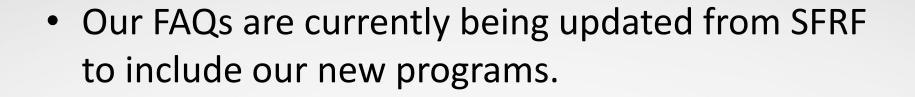


- Jennifer Wade, OPB Grants Division Director
- Jonna West, OPB Grants Manager
- David Luker, RSM





FAQs





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Guidance

This webinar provides additional detail for subrecipient compliance and reporting responsibilities under the Capital Projects Fund (CPF) grant program, and should be read in concert with the Award Terms and Conditions, the authorizing statute, and other regulatory and statutory requirements, including regulatory requirements under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance" or 2 CRF Part 200) and the Compliance Supplement.



- Recognize your obligation to comply with federal requirements and resources
- Identify next steps in the award process
- Identify your key grant documents
- Become familiar with available grant resources
- Understanding resources for audit requirements



Presentation Outline

- Overview of Program
- Award Next Steps
 - SAMS / UEI
 - Terms and Conditions
 - Portal Access
 - Vendor Management Forms- New Process
 - Final Budget Approval
 - Reimbursement Submissions
- Reporting
- Audits (RSM)



Grant Overview

The CPF Grant Program funds projects to provide funding for Broadband Infrastructure Projects (that reliably meet or exceed download and upload speeds of 100 Mbps) to unserved homes and businesses in Georgia. Additionally, CPF Grant Program awardees must participate in the Affordable Connectivity Program ("ACP") and are strongly encouraged to provide at least one low-cost, affordable option offered at speeds that are sufficient for a household with multiple users to simultaneously telework and engage in remote learning which the State deems as a minimum of 100/20 Mbps.

Performance Period: Date of Signed Terms and Conditions Agreement-December 31, 2026

The awardee may use CPF grants funds to cover costs incurred beginning from the date of executed terms and conditions, however, you must submit and have a final budget approved by OPB before costs are approved under this grant. No payments can be submitted for reimbursement without approval in the submitted and approved final budget.



- Eligible Use of Funds:
 - Allowable costs are determined in accordance with the cost principles identified in 2 C.F.R. Part 200, Subpart E. Federal funds committed to an award may only be used to cover allowable costs incurred during the period of performance and for allowable closeout costs incurred during the grant closeout process. Please refer to Treasury's Capital Projects Fund Guidance for States, Territories, and Freely Associated States and the FAQs issued on April 28, 2022, for additional information on eligible costs.
 - Costs must align to the approved final budget. Budget amendments may be submitted for consideration, however the final budget submitted to OPB upon award must align to the scope of your original application submitted to and approved for award by the State.



Recipients of CPF must use documented procurement procedures which conform to applicable Federal law and procurement standards covered in 2 CFR Part 200 Sections 200.317-200.326 and procedures which echo applicable State and local laws and regulations.

The following 2CFR policy requirements apply to this assistance listing:

- Subpart B, General provisions
- Subpart C, Pre-Federal Award Requirements and Contents of Federal Awards
- Subpart D, Post Federal; Award Requirements
- Subpart E, Cost Principles
- Subpart F, Audit Requirements



- The following 2 CFR Policy requirements also apply to this assistance listing:
 - 2 C.F.R. Part 25, Universal Identifier and System for Award Management;
 - 2 C.F.R. Part 170, Reporting Subaward and Executive Compensation Information; and
 - 2 C.F.R. Part 180, OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Non-procurement).



- The following 2 CFR Policy requirements are *excluded* from coverage under this assistance listing: For 2 CFR Part 200, Subpart C, the following provisions do not apply to the CPF program:
 - 2 C.F.R. § 200.204 (Notices of Funding Opportunities);
 - 2 C.F.R. § 200.205 (Federal awarding agency review of merit of proposal);
 - 2 C.F.R. § 200.213(Reporting a determination that a non-Federal entity is not qualified for a Federal award)
- For 2 CFR Part 200, Subpart D, the following provisions do not apply to the CPF program:
 - 2 C.F.R. § 200.306 (cost sharing or matching)
 - 2 C.F.R. § 200.316 (federal interest in property purchased or improved)



Procurement Standards

- **200.317** Procurements by states
- **200.318** General procurement standards.
- 200.319 Competition.
- **200.320** Methods of procurement to be followed.
- **200.321** Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.
- **<u>200.322</u>** Procurement of recovered materials.
- **200.323** Contract cost and price.
- **<u>200.324</u>** Federal awarding agency or pass-through entity review.
- **200.325** Bonding requirements.
- **200.326** Contract provisions.



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Subpart D Procurement

Recipients are responsible for ensuring that any procurement using CPF funds, or payments under procurement contracts using such funds, are consistent with the procurement standards set forth in the Uniform Guidance at 2 CFR 200.317 through 2 CFR 200.327, as applicable. 2 CRF 200.317 (i) states that the non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. The Uniform Guidance establishes in 2 CFR 200.319 that all procurement transactions for property or services must be conducted in a manner providing full and open competition, consistent with standards outlined in 2 CFR 200.320, which allows for non-competitive procurements only in circumstances where at least one of the following conditions is true: the item is below the micro-purchase threshold; the item is only available from a single source; the public exigency or emergency will not permit a delay from publicizing a competitive solicitation; or after solicitation of a number of sources, or competition is determined inadequate.



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Subpart D Procurement

Recipients must have and use documented procurement procedures that are consistent with the standards outlined in 2 CFR 200.317 through 2 CFR 200.320. The Uniform Guidance requires an infrastructure for competitive bidding and contractor oversight, including maintaining written standards of conduct and prohibitions on dealing with suspended or debarred parties. Your organization must ensure adherence to all applicable local, State, and federal procurement laws and regulations. (Treasury Reporting and Compliance Guide, P. 9)

See Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance" or 2 CRF Part 200) and the Compliance Supplement for exceptions and details.



Subpart D Procurement

2 CFR Part 200 Section 200.320 specifies five methods of procurements to be followed as illustrated in the table below^[1]:

Method	Aggregate Dollar Amount	Notes	Additional Notes		
1. Micro-Purchase	*Not to exceed	No quotations required if	To extent practicable		
	\$50,000	the price is reasonable.	distribute equitably among qualified suppliers.		
2. Small Purchase	Up to \$250,000 **	Rate quotations from an adequate number of qualified sources.	No cost or price analysis required		
3.Formal Procurement	>\$250,000 **	Primarily construction	Price is a major factor-		
a. Sealed Bid		projects-Firm fixed price contract.	formal process for bidding.		
4. Formal Procurement	>\$250,000 **	A procurement method in	RFP with evaluation		
b. Proposals		which either a fixed price or cost-reimbursement type <u>contract</u> is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids	methods for an adequate number of qualified sources.		
5.Formal Procurement	Available for	No competition	Must meet specific		
c. Non-Competitive (Sole-Source)	procurements of any dollar amount		circumstances including but not limited to the item is available only from a single source;		

^[1] See Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance" or 2 CRF Part 200) and the Compliance Supplement for exceptions and details. ^[2] Exceptions to this threshold can be found here https://www.ecfr.gov/current/title-48/chapter-1/subchapter-A/part-2/subpart-2.1

** Certain exemptions may apply. Recipients should consult the code of federal regulations https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1 for all thresholds and exemption



Subpart F Audit Requirement

Auditees

200.508 Auditee responsibilities.

200.509 Auditor selection.

200.510 Financial statements.

200.511 Audit findings follow-up.

200.512 Report submission.



(a) Audit required. A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of this part.

(b) Single audit. A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted in accordance with § 200.514 Scope of audit except when it elects to have a program-specific audit conducted in accordance with paragraph (c) of this section.

(d) Exemption when Federal awards expended are less than \$750,000. A non-Federal entity that expends less than \$750,000 during the non-Federal entity's fiscal year in Federal awards is exempt from Federal audit requirements for that year, except as noted in § 200.503 Relation to other audit requirements, <u>but records must be available for review or audit by</u> <u>appropriate officials of the Federal agency, pass-through entity, and</u> <u>Government Accountability Office (GAO).</u>



Subpart F Audit Requirement

(f) Subrecipients and Contractors. An auditee may simultaneously be a recipient, a subrecipient, and a contractor. Federal awards expended as a recipient or a subrecipient are subject to audit under this part. The payments received for goods or services provided as a contractor are not Federal awards. Section § 200.330 Subrecipient and contractor determinations sets forth the considerations in determining whether payments constitute a Federal award or a payment for goods or services provided as a contractor.

(g) Compliance responsibility for contractors. In most cases, the auditee's compliance responsibility for contractors is only to ensure that the procurement, receipt, and payment for goods and services comply with Federal statutes, regulations, and the terms and conditions of Federal awards. Federal award compliance requirements normally do not pass through to contractors. However, the auditee is responsible for ensuring compliance for procurement transactions which are structured such that the contractor is responsible for program compliance or the contractor's records must be reviewed to determine program compliance.



Also, when these procurement transactions relate to a major program, the scope of the audit must include determining whether these transactions are in compliance with Federal statutes, regulations, and the terms and conditions of Federal awards.

OPB Short Guide on Procurement



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Next Steps

Awardee Checklist

All applicants must complete the following list of items prior to submitting a request for reimbursement. Each program has an Grant Specialist assigned as the Program Specialist to assist awardees with any questions or concerns through the process.

This information can be found on the For Grantees webpage, linked below.

For Grantees - OPB

Next Step: Post Award Checklist

On April 4, 2022, the federal government transferred from using a DUNS Number to a Unique Entity Identifier that grantees must create in SAM.gov. In order to comply with this requirement, all grantees with the designation of subrecipient will require an active UEI (12-character, alpha-numeric code assigned by the U.S. General Services Administration (GSA)) to request a payment for reimbursement while all grantees with a designation of beneficiary will be required to have an EIN/TIN (employee identity number/tax identification number) to submit a payment request.

The icons below will walk you through the process of award acceptance and the necessary steps to getting set up in our system. All applicants must complete the following list of items prior to submitting requests for reimbursement. Each program is has an OPB Grant Specialist assigned as the Program Specialist to assist awardees with any questions or concerns throughout the process.

Important Note: Your award will show in the GeorgiaGrants portal as awarded under My Grants once the terms and conditions is signed, the vendor form is processed (see step 4 below), and the final budget is approved (Step 5 is only applicable for subrecipients).

Please see our Post Award FAQs for updates on deadlines and processes. This document can be found at the following link:

https://opb.georgia.gov/document/cocument/csfrf-post-award-faqs/download





The UEI number issued through SAM.gov is a federal requirement that must be completed in order to request a reimbursement for an awarded grant. Additionally, Treasury requires that your UEI be public in order to validate it is active and you have no exclusions at the time of payment. OPB has a step by step guide to help grantees who may have opted out of the public search option.

Note: Your UEI must remain active throughout your award. If your UEI expires, your payment requests will be rejected until you rectify the inactive UEI.



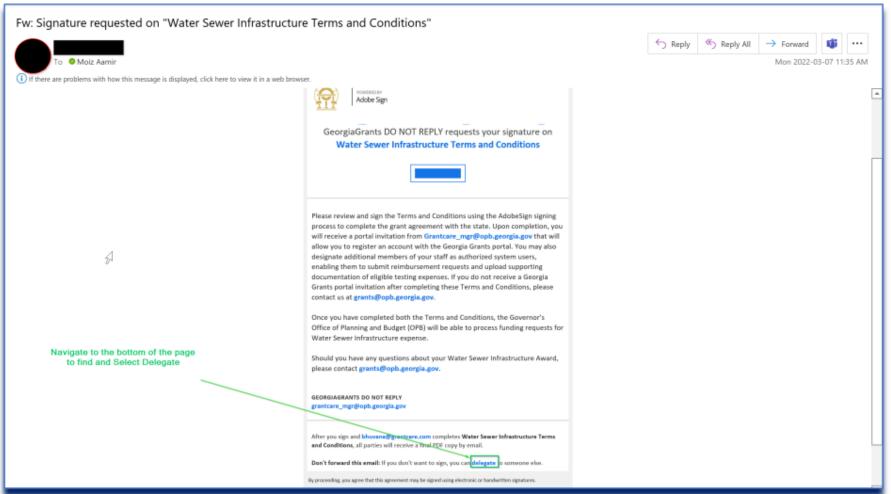
An agreement outlining the terms of your award called the Terms and Conditions has been sent to you after your award notification has been sent. While the timeframe for sending this differs by program, once sent, this document will need to be signed by an Authorized Official to accept the conditions of your award.

- The Terms and Conditions email come from adobesign@adobesign.com
- Must be signed within 60 days from initial dissemination.
- User guide under important documents on the For Grantee website <u>https://opb.georgia.gov/covid-response/grantees</u>
- Users may delegate, however if you need OPB to resend it to an authorized user not listed on your account, you must update your contacts through an official designation form.



Delegating Terms & Conditions

Navigate to the bottom of the email in the agreement details to find "Delegate" and click.





Delegating Terms & Conditions

Selecting Delegate will take you to another link allowing you to Delegate the Document.

Email: Message:			
	Delegate		



Delegating Terms & Conditions Video

A step-by-step video is available on the OPB website to assist you with delegating Terms & Conditions. It can be found under the For Grantees Section, then under Webinars and Tutorials, or click the link below.



Terms and Conditions Delegation

Instructions on how to delegate the signing of the terms and conditions (award agreement) to the authorized official or representative for your entity. Accompanying pdf instructions can be found **Delete**.

CLICK HERE FOR VIDEO

How to Delegate Terms & Conditions Video



Awardees will receive an email from OPB's Grant Management System, GeorgiaGrants to facilitate account set up and award management. This email will go to the POC listed on the awardee's application.

The GeorgiaGrants Portal User guide with instructions on adding users can be found under the important document section on our For Grantees website.



To facilitate payments to grantees, awardees must be registered as a vendor with the state and provide information to accept electronic ACH payments.

- Awardees will receive a notification from the GeorgiaGrants portal to complete the vendor management form.
- Awardees will be required to upload a completed Form W-9 (2018 IRS Updated version found at <u>www.irs.gov</u>)
- Website Link with Instructions:
 - <u>https://opb.georgia.gov/step-4-vendor-management</u>



Before submitting reimbursement requests, you must submit a final detailed budget worksheet. This budget is project specific.

Grantees will be assigned a programmatic grant specialist to review the budget and provide the final approval. Grantees will receive final approval in the GeorgiaGrants portal for their approved budget.

Below are links to the Budget Worksheet and Budget Worksheet Guide. They can be found on the OPB website under the For Grantees section, then Important Documents and Guides.

- Detailed Budget Worksheet
- Budget Worksheet Guide



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Final Budget

- Final budgets should contain CPF grant related project costs only. Please do not include project costs that will be funded with fund sources outside of the CPF grant. Match funds should not be included in your final budget.
- Contracts/Services, etc. are subject to 2CFR 200 procurement requirements. As such, if these contracts, etc. do not align to federal guidance, do not include them in your final budget submitted to OPB. Funds sources outside of CPF funds awarded should follow any requirements or restrictions for the fund source used.



A budget revision increases or decreases specific budget category line items but does <u>not affect the total awarded amount.</u>

Reasons for a budget revision may include:

- Change in a key person specified in the application or the award.
- Disengagement from the project.
- Costs that require prior approval.
- The transfer of funds budgeted for participant support costs to other categories of expense.

Budget Adjustments and Scope Change forms along with processes instructions are located in the important document section of the For Grantees webpage.



A change in scope occurs when the recipient proposes to change the objectives, aims, or purposes identified in the approved application. Grant recipients must submit a change in scope request in order to change the scope or objectives for federally supported projects.

Reasons for a Change in Scope Amendment may include:

- Changes to the objectives, aims, or purposes, such as changes to the service area or elimination of a care delivery site.
- Transfer of the performance of substantive programmatic work.
- Budget revisions that cause a project to change substantially from that which was approved.

The State does not anticipate project location changes for Broadband project. For this program, scope changes should not include location changes unless extenuating circumstances apply.



Payment Requests will be submitted through the Georgia Grants Portal.

Grantees should submit any submission template associated with the grant program in the portal along with the supporting documentation for each budget category. <u>Please ensure you submit each request under the</u> <u>appropriate file type to ensure it is not returned for revision.</u>

Required Documentation

- <u>**1. Payment Template</u>** (Click to download)</u>
- 2. Supporting Documentation (dependent on type of expense, see Documentation Guide tab on template)



- Payment requests will be made in GeorgiaGrants portal using the required template on the OPB website and the required supporting documentation
- Funds will be dispersed through the bank account listed on the vendor management form submitted to SAO.
- If a change to their banking information is required, the grantee will work with OPB and the State Accounting Office to verify new banking info before a payment is made.
- Timing of payments depends upon correct banking, signing of terms and conditions, <u>and providing complete documentation</u>
- All returns for revision notifications will be sent through the portal
- How to Submit a Payment Request Video



Budget categories vary per project. Not all projects will have allowable expenses in all categories. These will align to your proposed application and approved final budget.

- Personnel
- Fringe
- Travel
- Equipment (over \$5,000)
- Supplies (Under \$5,000)
- Contracts, Consultants, and Subawards
- Other



The link to the payment request template is below and can be found on the OPB website under the For Grantees section, then Important Documents and Guides.

1	ver 5.3.22	-		-	-	- ·	
2	Governor's Office of Planning a	nd Budget					
3	Payment Request Summary						
4							
5	Payment Request Summary Instructions						
6	Grant Program Name:						
7	Grant ID Number (GA-xxxxxxx):	-					
8	Grantee Organization Name:						
9	Contact Name:						
10	Contact Title :						
11	Contact Email:						
12	Contact Phone Number:						
13	Date Range included in Payment Request:						
	Total Amount Requested :	\$0.00					
	ATTESTATION: I have reviewed the amoun the appropriate totals on the respective tabs I certify that I have reviewed each expense s supporting documentation and that to my kr with each item of supporting documentation	in this workbook. ubmitted in this form along with owledge, the description and tot	each corresponding item tal of each expense along				
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17		Payment Request Summary	Personnel and Fringe	Trave 🕂 🕴 🚺			
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The template includes a tab for instructions, as well as a tab for documentation guide. Please review these tabs and information as they will assist you in completing the payment request template and help us to process your request in a timely manner.

Payment

<u>Request</u>

Template



Point of Contact / Authorized User Updates

There are two ways in which a point of contact or authorized user can be changed

- Users can add or update authorized users in the system so an existing point of contact in the grant can add a new primary contact or authorized user.
 Instructions can be found on page 27 of our GeorgiaGrants Portal User Guide here: <u>Portal User Guide</u>
- 2. A new POC can complete the request online at the link below: Please note that this second option requires a signature from an authorized official within the requestor's organization or entity on letterhead to validate that the requested contact be added to the grant on file or replace an existing POC. The second method also takes up to two weeks to process.

Authorized User Designation Survey (surveymonkey.com)



Reporting Timeline

Grantees must complete the mandatory reporting survey for the following quarters in order to fulfill the reporting requirements placed upon the State of Georgia by the United States Department of the Treasury. Awardees should prepare for these reports after signed the terms and conditions agreement to ensure the information is available for timely reporting by the 15th of each month following each quarter.

- Quarter 1: January-March (Due April15th)
- Quarter 2: April-June (Due July 15th)
- Quarter 3: July-September (Due October 15th)
- Quarter 4: October-December (Due January 15th)

Please note that due dates are subject to change based Treasury or OPB updates



Required Programmatic Data

Grantees will receive an email from Survey Monkey Apply, OPB's reporting tool, for mandatory quarterly reporting data as required by Treasury in the <u>Compliance and Reporting Guide</u> for each grant program. OPB may add additional metrics to the Treasury requirements where relevant. More details regarding the updated tool are forthcoming. OPB will conduct reporting training prior to the next deadline and grantees can continue to check the FOR Grantees webpage for reporting updates.



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Davis-Bacon

Davis-Bacon: Davis-Bacon prevailing wage requirements DO apply to projects receiving \$5 million or more in CPF funding (based on expected total costs). All grantees with applicable projects receiving \$5 million or greater in total project costs are required to comply with the Davis-Bacon prevailing wage requirement and certify that they are in compliance during quarterly reporting. Projects that do not certify with compliance do not meet this requirement and will not be funded.

Davis-Bacon specifies the prevailing wages, including fringe benefits, which are determined to be prevailing for the described classes of laborers and mechanics employed on construction projects of a similar character in the localities specified therein. Recipients will have two options with regards to complying with this requirement in their quarterly report:



1. Certify that the project with a total CPF funding of \$5 million or greater complies with Davis Bacon

2. If the project does not certify Davis Bacon, as an alternative, they must complete and upload a Project Employment and Local Impact Report to include linked in the report and on our website:

- The number of employees of contractors and subcontractors working on the project
- The number of employees on the project hired directly and through a third party
- The wages and benefits of workers on the project by classification
- Whether those rates are less than prevailing



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Audits

Monitoring for fraud, fiscal negligence, and non-compliance

Pursuant to the terms and conditions of each award. Grantees will be enrolled in a fraud monitoring program administered by OPB and its third-party audit representative RSM US LLP ("RSM"). This program will require Grantees to comply with requests for information including, but not limited to, budgets, solicitations, bid evaluations, contracts, invoices, payments and other documentation. OPB and RSM will coordinate onsite inspections with Grantees, whom will provide fraud monitors unfettered access to project site(s), field laborers, project management personnel, and documentation. The scope of this program will include the activities and information of subrecipients, subsubrecipients, vendors, suppliers and any other parties whom receive direct financial benefit as a result of the grant award.



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Audits

How to prepare

Budgets

- Complete the OPB Detailed Budget Worksheet timely, and with the greatest level of detail available to you
- Clearly identify underlying unit prices and quantities where available, do not enter lump sum amounts without a corresponding justification / narrative
- Provide detailed descriptions and supporting schedules regarding how cost estimates were developed for Construction, Equipment, and Contracts/Consultants/Subawards

Procurement and Disbursements

- Enact strong document management and retention controls for all project related commitments and expenditures including but not limited to:
 - · Solicitations, advertisements
 - Bids
 - · Contracts / purchase orders (Appendix II)
 - Invoices
 - · Payroll registers, timesheets, daily logs
 - Proof of payment
 - Policies and procedures
- Ensure high value contractors and their subcontractors are aware of the monitoring program, and are responsive to requests

Audit Areas^{N1}

- State Reporting
- 2 CFR Compliance
- Procurement
- Permitting
- Disbursements
- Subcontracting
- Change Orders / Contingency Use
- Inspections
- Construction fieldwork
- Labor
- Environmental
- Safety
- Equity and Inclusion

N1 - Example, not a comprehensive listing



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Recipients may consult the following for more resources on compliance with Treasury Guidance:

- <u>Uniform Administrative Requirements, Cost Principles, and Audit</u> <u>Requirements for Federal Awards ("Uniform Guidance" or 2 CRF Part</u> <u>200</u>)
- <u>CPF Program Guidance</u>
- <u>CPF Reporting Guidance</u>
- Please see the in SAM.gov under assistance listing number (formerly known as CFDA number), 21.029. for more information.



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Contact Us

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