

Governor's Office*of* PLANNING AND BUDGET

THE STATE OF GEORGIA

# **Grantee Onboarding**

# Georgia Investments in Housing Grant October 2022



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 Many of your questions can be answered by reviewing our Post-Award FAQs available on the OPB website under For Grantees, Important Documents.

-Post-Award FAQs

FAQs

 Includes information on 2 CFR 200, Payment Requests and the reimbursement process, as well as Environmental Review, where applicable.



- There are federal guidelines attached to these funds.
- SFRF are grant funds under ARPA, not loans.
- It is the subrecipient's responsibility to review and understand the requirements of agreeing to federal funding.
- 2 CFR 200 Policy Requirements are applicable to these funds. This includes but is not limited to Single Audits, Competitive Procurement, among others that we will highlight in this webinar. However, the subrecipient should read through each Subpart to understand their responsibilities.
- DAVIS Bacon is applicable for any project whose Total Project
   Costs (SFRF+ Additional Funding) is \$10m or greater.
  - Contracts (for goods or services with vendors) are required to have Treasury specific language.



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#### Expectations

- Awardees will be expected to align to the affordability criteria that was outlined by Treasury in Final Rule, the State's application, the OPB website, the attestation signed by awardees, and within the terms and conditions agreement.
- Treasury's Eligible Income Levels Outlined in Final Rule: Low • or moderate-income households and communities are those with (i) income at or below 300 percent of the Federal Poverty Guidelines for the size of the household based on the most recently published poverty guidelines by the Department of Health and Human Services (HHS) or (ii) income at or below 65 percent of the Area Median area median income for the county and size of household based on the most recently published data by the Department of Housing and Urban Development (HUD).



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- Awardees affordability metrics will be captured throughout the subrecipient monitoring process.
- Awardees will not be reimbursed for costs associated with the project that are dated prior to the award approval date (Signed terms and conditions, vendor management, and final budget approval).
- Awardees have 60 days to sign the terms and conditions agreement under this program. Awardees should notify OPB of the intent to decline the award as soon as possible.



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Guidance

This webinar provides additional detail for subrecipient compliance and reporting responsibilities under the State Fiscal Recovery Fund (SFRF) program, and should be read in concert with the Award Terms and Conditions, the authorizing statute, the final rule, 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.



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- 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
  - Final Budget Approval
  - Reimbursement Submissions
- Reporting
- Audits (RSM)



The Georgia Investments in Housing Grant will support nonprofits that are 501(c)(3) or 501(c)(19) tax-exempt organizations who provide affordable housing and aid individuals experiencing homelessness. This program is intended to support non-profit housing project applications that aid individuals experiencing homelessness.

**Performance Period:** Date of Onboarding Completion (Grant Approval)-October 31, 2026\*



- Eligible Use of Funds:
  - Real property acquisition (Housing Trust Fund)
  - Site improvements and development hard costs (Housing Trust Fund)
  - Reasonable administrative and planning costs (Housing Trust Fund)
  - Housing rehabilitation; (HOME Investment Partnership)
  - New construction of housing (HOME Investment Partnership)



#### **Grant Overview**

- Please Note:
  - Note that the HOME and Housing Trust Fund programs use different income limits than the definition of low- and moderate-income adopted by Treasury.
    - "Treasury's Eligible Income Levels Outlined in Final Rule: Low or moderate-income households and communities are those with (i) income at or below 300 percent of the Federal Poverty Guidelines for the size of the household based on the most recently published poverty guidelines by the Department of Health and Human Services (HHS) or (ii) income at or below 65 percent of the Area Median Income for the county and size of household based on the most recently published data by the Department of Housing and Urban Development (HUD)."
  - Although State Local Fiscal Recovery funds allow for a broad range of allowable uses, the award funding under this grant through the Office of Planning and Budget must align to the allowable uses approved by OPB and agreed upon in the grant agreement.



Recipients of SFRF 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 21.027 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

Additional requirements may be placed on awards as outlined in an executed terms and conditions agreement to accept the award.



#### **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.
- **200.322** Procurement of recovered materials.
- **200.323** Contract cost and price.
- **200.324** 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 SLFRF 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)

#### **OPB Short Guide on Procurement**

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<sup>[1]</sup>:

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		or cost-reimbursement	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;

<sup>[1]</sup> 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. <sup>[2]</sup> 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



(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>



(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.



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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 OPB 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 Steps: Awardee Check List

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 by the State Accounting Office (see step 4 below), and the final budget is approved (Step 5 is only applicable for grants awarded as a result of a competitive application submission).

Please see our Post Award FAQs for updates on deadlines and processes. This document can be found here:https://opb.georgia.gov/document/document/csfrf-post-awardfaqs/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. The registration process could take some time, so OPB strongly encourages applicants to begin today, if they have not already.

# SAM.gov

Grantees will not be able to sign Terms & Conditions without having their UEI available to enter onto the form.



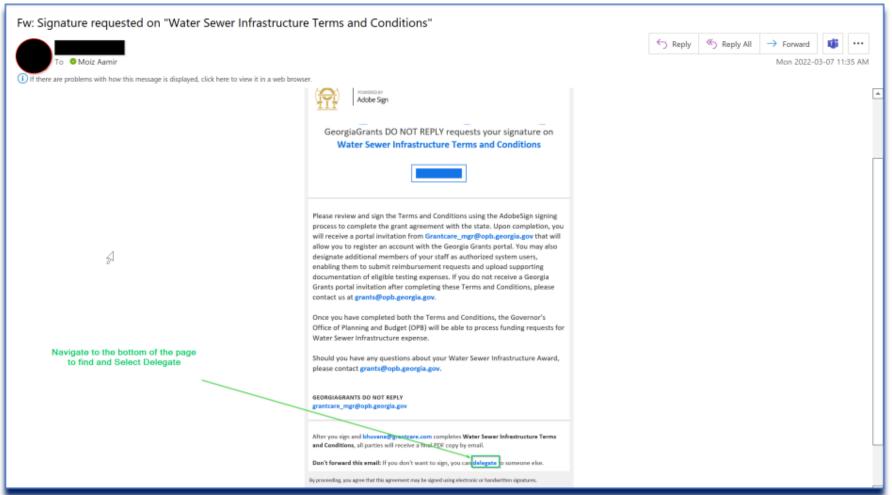
An agreement outlining the terms of your award called the Terms and Conditions will be sent to you after your award notification has been sent. While the timeframe for sending this differs by program, once sent, this document will need to be signed by an Authorized Official to accept the conditions of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

- T&Cs are forthcoming
- The Terms and Conditions email will 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



## **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.

Delegate this document To send this document to another individual in your organization for signature, enter their email address and a message below.	
Email: Message: Delegate	



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 **main here.** 

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.

- To facilitate payments to grantees, awardees must be registered as a vendor with the state and provide information to accept electronic ACH payments. Processing of these forms may take up to 4 weeks.
- 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 and capital expenditure form (Treasury Requirement). 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



## **Final Budget**

- Final budgets should contain OPB State Fiscal Recovery Fund (SFRF) grant related project costs only. Please do not include project costs that will be funded with fund sources outside of the ARPA SFRF. 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 ARPA 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.



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.



#### What to Include in Your Request

Email the request for budget revision to your Program Specialist with Budget Revision Request GA-(insert your award #) in the subject

1. Cover Letter

- Explain the change in scope to your project and why it is necessary. Include a detailed explanation of any potential impact on the approved project budget, and on accomplishing the aims and objectives of the funded project.
- Discuss and document any unique circumstances that will impact the ability to meet the expectations of the funded project.
- 2. Updated Project Narrative
- 3. Updated Budget Worksheet with line-item justifications

#### Additional items may be requested by your Program Specialist



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</u> <u>submit each request under the appropriate file type to ensure it</u> <u>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 3 Payment Request Summary	and Budget		
<u>Payment</u>	4 5 Payment Request Summary Instructions 6 Grant Program Name: 7 Grant ID Number (GA-xxxxxxx):			
<u>Request</u>	8 Grantee Organization Name: 9 Contact Name: 10 Contact Title : 11 Contact Email:			
<u>Template</u>	<ol> <li>Contact Phone Number:</li> <li>Date Range included in Payment Request:</li> <li>Total Amount Requested :</li> </ol>	\$0.00		
	ATTESTATION: I have reviewed the amounts and certify the totals are correct as shown and agree to the appropriate totals on the respective tabs in this workbook. I certify that I have reviewed each expense submitted in this form along with each corresponding item of supporting documentation and that to my knowledge, the description and total of each expense along with each item of supporting documentation is accurate, and complies with the requirements for this form along ant.			
	Instructions     Documentation Guid Ready	Payment Request Summary Personnel and Fringe Trave () : (	▼ ■ □ □ + 100%	

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.



# 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)



OPB will collect information from awardees as part of their reporting requirement outlined by Treasury in The Compliance and Reporting Guide and in the Terms and Conditions agreement between OPB and the grantee. The current version is located here for reference:

**SLFRF Compliance and Reporting Guide** 

 Expense Category for this program is: Georgia Investments in Housing, Other CFDA 21.027



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# Environmental Review and Historic Preservation

Section 106 of the NHPA does not apply to Treasury's administration of SLFRF funds, including funds expended under the revenue loss, public health and negative economic impacts, and water, sewer, and broadband infrastructure eligible use categories. Projects supported with payments from the funds may still be subject to Section 106 of the NHPA if they involve participation from other federal agencies, including funding from other federal financial assistance programs, or are subject to receipt of approvals from other federal agencies.

Consultation with DCA/Historic Preservation Division is only required if there is additional federal involvement beyond the ARPA SLFRF funding.



# Environmental Review and Historic Preservation

The State Environmental Review Process under the Environmental Protection Division is applicable to these projects. More information on ARPA State Fiscal Recovery Funds SERP process for water/sewer infrastructure projects can be found <u>here</u>. Broadband infrastructure projects should consult with their Broadband <u>EPD Office</u> with regards to environmental impact. Additional information on this process can be found in a webinar published under the webinars and tutorial section of the <u>For Grantees</u> <u>website</u>.

It is the responsibility of the subrecipient to consult with the appropriate state office with regards to the project's impact and any necessary environmental review. Please note that consultation with the appropriate office needs to be completed prior to beginning any activities for projects that have not begun. Grantees will be required to submit environmental review documentation prior to any payment request submissions. Additionally, please note that while consultation with DCA/Historic Preservation Division is typically expected as part of the State Environmental Review Process, consultation for ARPA SLFRF projects is only applicable in some instances, as outlined above.

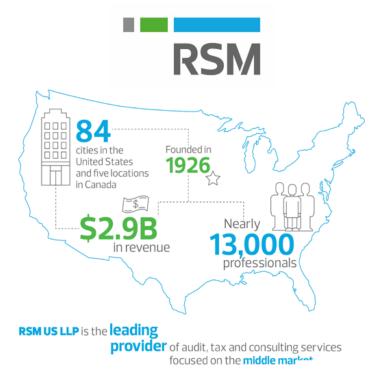


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#### Audits

#### 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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#### 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<sup>N1</sup>

- 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 Final Rule:

- State Local Fiscal Recovery Compliance and Reporting Guide
- <u>Statement Regarding Compliance with the Coronavirus State and Local</u> <u>Fiscal Recovery Funds Interim Final Rule and Final Rule</u>
- Final Rule
- <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>Compliance Supplement</u>
- Please see the <u>Assistance Listing</u> in SAM.gov under assistance listing number (formerly known as CFDA number), 21.027 for more information.



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# Contact Us

General Grant Inquiries – grants@opb.Georgia.gov

Housing Program Grant Specialist – <a href="mailto:shelly.thoms@opb.Georgia.gov">shelly.thoms@opb.Georgia.gov</a>

Audits - GeorgiaARPA@rsmus.com