

Governor's Office*of* PLANNING AND BUDGET

THE STATE OF GEORGIA

## GEER II -EANS GRANTEE ORIENTATION

## Presented By

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## Program Overview

- Allowable Use of Funds
- Federal Requirements
  - Uniform Grant Guidance 2 CFR 20
  - Procurement Standards
- Risk Assessment
- Entity Onboarding Process
- Payments
- Budget Revisions
- Questions



## General Principles for Costs to be Allowable

#### To be allowable the costs must:

- Align with the grant award terms and conditions
- Be consistently categorized by the grantee across awards
- Comply with grantee's established policies and procedures
- Adhere to Generally Accepted Accounting Principles
- And not be included in other federally funded programs including matching or inkind contributions; and
- Be necessary, reasonable, or allocable for the grant project
  - Necessary to complete the activities within the grant. See 2 CFR 200.403
  - Reasonable is a cost that if in its nature or amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. See 2 CFR 404
  - Allocable means it can be traced to specific activities of a grant project. Costs to the project are in accordance with the benefits received. See 2 CFR 405



- The allowability of costs are detailed at <u>2 CFR 200.420-.475</u>
  - Currently 54 cost categories
  - Recommend bookmarking for easy reference
- Keep in mind that Uniform Grant Guidance allows for program laws and regulations to deviate from allowable and unallowable costs. Thus, a review of the grant award is also necessary to determine allowability
- Funds will not be used to support administrative or executive salaries and benefits as referenced at § 18002(c)(3) of the CARES Act.



Additional Spending Rules and Considerations

GEER II funds are subject to EDGAR and the UGG, including the requirement that spending be necessary and reasonable.

#### **Equitable Services**

LEAs are not required to provide equitable services with ESSER II or GEER II funds. Instead, Congress created a separate program under CRRSA (the Emergency Assistance for Non-Public Schools program) for non-public schools administered by the state. LEAs must continue to comply with the CARES Act equitable services requirements for ESSER I and GEER I.

#### Reporting

ESSER II and GEER II are subject to the same reporting requirements as ESSER I and GEER I. Therefore, the state will continue to collect the information necessary to comply with CARES reporting requirements, which is done through Federal Funding Accountability and Transparency Act (FFATA) reporting. In addition, we will collect additional information if required by ED.



## Federal Requirements

#### **Uniform Guidance**

The following 2 CFR policy requirements apply to 21.027 assistance listing for Coronavirus State and Local Fiscal Recovery Funds (CSLFRF), Coronavirus State Fiscal Recovery Fund (CSFRF) and Coronavirus Local Fiscal Recovery Fund (CLFRF):

- 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



## 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 Post Federal Award Requirements

### **Procurement Standards**

- 200.317 Procurements by states
- 200.318 General procurement standards. 200.319 Competition.
- 200.320 Methods of procurement to be followed.
- <u>200.321</u> 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.
- <u>200.324</u>Federal awarding agency or pass-through entity review. 200.325Bonding requirements.
- 200.326 Contract provisions



# There are two thresholds that recipients should keep in mind related to procurement requirements:

**Micro purchase threshold (MPT)** 2 C.F.R. § 200.320(a)(1): Purchase of supplies and services for a price below the MPT, currently set at \$10,000, are not required to be solicited competitively. However, there are circumstances when a recipient may have a MPT that is greater than \$10,000. For example, all non-Federal entities may increase their MPT up to \$50,000 if they follow the protocols described in 200.320(a)(1)(iv).

**The Simplified Acquisition Threshold (SAT)** 2 C.F.R. § 200.320(a)(2): Purchases of property and services at a price above the recipient's MPT and below the SAT, currently set at \$250,000, may be made following the small purchase procedures described in the definition of SAT in 2 C.F.R. § 200.1 and 2 C.F.R. § 200.320(a)(2). Procurement of property and services at a price above the SAT must follow the formal procurement methods outlined in 2 C.F.R. § 200.320(b)



## Procurement Methods

Method	Aggregate Dollar Amount	Notes	Notes Additional Notes
Micro-purchases ( <u>2 CFR</u> <u>200.320(a) (1)</u> )	*Not to exceed \$50,000	No quotations required if the price is reasonable.	To extent practicable distribute equitably among qualified suppliers.
Small purchases ( <u>2 CFR</u> <u>200.320(a)</u> ( <u>2</u> ))	Up to \$250,000 **	Rate quotations from an adequate number of qualified sources.	No cost or price analysis required
Competitive a. Sealed bids <u>(2 CFR_200.320(b))</u>	>\$250,000	Primarily construction projects- Firm fixed price contract	Price is major factor formal process for bidding
. Formal Procurement b. Proposals (200.320(b))	.>\$250,000	A procurement method in which either a fixed price or cost-reimbursement type contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids	RFP with evaluation methods for an adequate number of qualified sources
Formal Procurement c. Non-Competitive (Sole-Source) ( <u>2 CFR_200.320(c)</u> )	Available for procurements of any dollar amount	No competition/Must be authorized by the agency (or Pass- through entity)	Must meet specific circumstances including but not limited to the item is available only from a single source;



## **Procurement Required Documentation**

Procurement Method	Documentation needed for reimbursement	
Micro-Purchase	No documentation	
Small purchase (less than or equal to the Simplified Acquisition Threshold of \$250,000)	Documentation (e.g., quote from a vendor or notes from a verbal quote) that price quotes were obtained from "an adequate number of qualified sources" (a minimum of three is recommended) and a brief explanation as to why the successful vendor was chosen.	
Formal Procurement a. sealed bid	<ul> <li>The Invitation for Bid;</li> <li>Copy award notification and contract to the successful vendor</li> </ul>	
Formal Procurement b. competitive proposal	<ul> <li>The Request for Proposal</li> <li>The RFP advertisement</li> <li>The vendor evaluation criteria</li> <li>A copy of the notification and contract to the successful vendor</li> </ul>	
Formal Procurement c. noncompetitive proposals (Sole Source)	Sole Source Justification Form https://opb.georgia.gov/document/document/sole-source- justification-form/download	



## Risk Assessment

### **OPB Risk Assessment Tool**

Link: <u>https://opb.georgia.gov/document/document/tool-assessing-</u> <u>risk/download</u>

The Governor's Office of Budget and Planning requires sub-recipients to complete a risk assessment to ensure that awarded grant funds are used for authorized purposes in compliance with Uniform Guidance (2 CFR 200) which echoes applicable State and local laws. Depending on the sub recipients risk assessment results, monitoring tools may be used to ensure proper accountability and compliance with program requirements and achievement of performance goals.



## Awardee Checklist

Guidance on how to complete each step can be found on the OPB Grantee Webpage

For Grantees | Governor's Office of Planning and Budget (georgia.gov)

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#### Entity Onboarding Process

#### Next Steps: Awardee Checklist

All applicants must complete the awardee checklist prior to submitting reimbursement submissions. Each program has an OPB Grant Specialist to assist awardees with any questions or concerns throughout the process of award acceptance.

Guidance and information for each step can be found on the OPB Grantee Webpage

For Grantees | Governor's Office of Planning and Budget (georgia.gov)

#### For Grantees





## Step 1: Unique Entity Identifier

**Unique Entity Identifier (UEI):** All eligible payees are required to have a Unique Entity ID (UEI) as part of registration in addition to maintaining an active registration in the System for Award Management (SAM) (<u>https://www.sam.gov</u>). (Treasury Final Rule FAQ 11.4. <u>https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-FAQ.pdf</u>) The Federal Government has transitioned from the use of the DUNS Number to the Unique Entity Identifier (UEI) as the primary means of entity identification for Federal awards government-wide. UEIs are required in accordance with 2 CFR Part 25, and the transition from DUNS to UEI has resulted in the UEI being issued by the Federal Government in <u>SAM.gov</u>.

SAM.gov is currently experiencing a delay due to the large volume of requests so it is recommended that you complete your SAM.gov registration as soon as possible to avoid any additional delays in funding. You cannot execute your terms and conditions grant agreement without a valid UEI and SAM registration.



# Step 2: Sign the Award Terms and Conditions

#### All Terms and Conditions must be signed within 30 calendar days of receipt

- The agreement will be sent to the POC list on the application in the weeks following award announcements.
- The signature of a person must possess the authority to enter into a legal agreement on behalf of the entity.
- Delegating Terms and Conditions directions can be found on the OBP website <u>https://opb.georgia.gov/document/document/how-delegate-</u> <u>terms-and-conditions/download</u>
- The terms and conditions email will come from <a href="mailto:adobesign@adobesign.com">adobesign@adobesign.com</a>.



Awardees will need to obtain access to the GeorgiaGrants portal upon signing the Terms and Conditions.

- An Authorized User can add or update user accounts in the portal.
- The GeorgiaGrants Portal User guide with instructions on adding users can be found by clicking <u>https://opb.georgia.gov/document/document/georgiagrants-</u> <u>portal-user-guide/download</u>



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.

#### Already a state vendor/supplier?

- 1. Complete Sections 2-4 & 6 of the attached Vendor Management Form (VMF).
  - 1. Driver's license is NOT needed.
- 2. Section 3 must include the full bank account and routing number.
  - 1. Check only the 2nd box for "specific purpose."
  - 2. On that line, include "Grant Name." (if you do not know what the grant name is, please <u>email</u> <u>us</u> to confirm as an incorrect name will result in processing delays)
- 3. Section 4, select box "Other."
- 4. Section 6, write in "Grant Name" and "Validate Existing Bank Account."
- 5. Submit VMF form to grantforms@opb.georgia.gov



#### Need to register as a state vendor/supplier?

- Complete a Form W-9 (2018 IRS Updated version found at <u>www.irs.gov</u> or attached).
  - 1. All sections should be complete.
  - 2. Ensure your TIN/EIN number is correct.
  - 3. Date of signature must be within the past 12 months.
- 2. Complete the attached Vendor Management Form (VMF).
  - 1. Complete *Sections 2-4* only.
  - 2. Driver's license is NOT needed.
  - Section 3 must include the full bank account and routing number. Check only 2nd box for "specific purpose." On the line, include the grant program name (if you do not know what the grant name is, please <u>email us</u> to confirm as an incorrect name will result in processing delays)
- 3. Submit VMF and W9 forms to grantforms@opb.georgia.gov



# Step 5: Final Budget and Program Justification

Before submitting reimbursement requests, awardees must submit a final budget to their Grant Specialist. Once the final budget review has been completed for approval grantee will receive an email notification through the portal.

All budgets are required to submit details on how the funds will be spent to the greatest extent possible. Adequate detail should be provided in the budget narrative to justify the expense under the approved award.

- Budget Worksheet:
- <u>https://opb.georgia.gov/document/document/budget-</u> worksheet/download
- Budget Worksheet Instructions: <u>https://opb.georgia.gov/document/document/budget-worksheet-instructions-0/download</u>



#### A budget revision increase or decreases specific budget category line items but does not affect the total awarded amount.

- Follow and monitor your approved grant budget and project
- The following changes would require a budget revision request
  - Budget changes in any category of plus or minus 25% or more
  - Changes in scope or objective of the grant
  - Changes in key personnel
  - <u>See 2 CFR 308</u>
- Change requests may result in audit findings, additional monitoring requirements, and/or modifications to the grant award



# 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 may include:

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

#### How to submit a Change of Scope Request.

- Complete a <u>Change of Scope Form</u>
- Updated **Budget Worksheet**

Email the request to your Program Specialist with Change of Scope Request GA-(insert your award #) in the subject with attached required documentation



# Grantees can submit for eligible reimbursements within their approved budget categories once all steps are completed.

- Payment Requests will be submitted through the Georgia Grants Portal.
- Grantees must submit an OPB payment template and the required supporting documentation.
- Supporting documentation is required for all payment requests and is needed for OPB to ensure compliance with the allowable use of funds. Expenses must be necessary, reasonable, allocable, and allowable under the grant agreement. Grantees must maintain file copies of all documentation related to the grant including documents submitted to OPB
- To avoid a return, please ensure that all purchases are supported by proof of payment such as a canceled check, bank statement, electronic reference, etc. All payment request for reimbursement for allowable contracts should be supported by an executed contract, invoice, and proof of payment

How to Submit a Payment Request Video
Payment Template



#### Grantee can check the status of a payment request in the portal

- Draft: Payment request has not been submitted
- Submitted: Subrecipient has submitted the payment request Review In Progress: A reviewer is reviewing your documents
- Decision in Progress: The request has been approved by the level 1 reviewer Approved: The request has been approved by the level 2 reviewer
- Payment In Progress: The request is in progress for payment.
- Payment Complete: The payment has been completed
- Return for Revision: OPB has returned the payment request back to the subrecipient for revision.
- Rejected: The payment request has been rejected
- Funds will be dispersed through the bank account listed on the vendor management form submitted.
- If a change to their banking information is required, the grantee will work with OPB and the State Accounting Office (SAO) to verify new banking info before a payment is made.



## **Tools and Resources**

**Entity Onboarding** Authorized User Designation Risk Assessment Tool SAM.gov **Delegating Terms and Conditions** GeorgiaGrants Portal Authorized User Form <u>Vendor Management Form (VMF)</u>. **Budget Worksheet Directions Budget Worksheet Template** Change of Scope Form

**Reimbursement Submissions** How to Submit a Payment Request Video Payment Template Policy and Procedures 2 CFR Procurement Resource Guide Reporting and Compliance Guidance Sole Source Justification Form Additional Information and Guidance can be found on the OPB Grantee Webpage https://opb.georgia.gov/covidresponse/grantees



## Questions