

Grantee Orientation

American Rescue Plan Act February 2022



Presenters

OPB

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- Kristi Fuss, Grants Specialist

RSM

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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 <u>final rule</u>, and other regulatory and statutory requirements, including regulatory requirements under the <u>Uniform Administrative Requirements</u>, <u>Cost Principles</u>, and <u>Audit Requirements</u> for Federal Awards ("Uniform Guidance" or 2 CRF Part 200) and the <u>Compliance Supplement</u>.



Grantee Accounts Reminder

In accordance with best practices for grant management and internal controls, persons outside of an organization directly receiving a grant award should not have access to the awardee's account within the GeorgiaGrants portal.

OPB will work to remove any such users on or before March 25, 2022. Both the Primary Point of Contact and any related users for a given account must be direct employees of the grant receiving entity. To assist us in this effort, if you are a primary point of contact within your organization, please check that all listed authorized users are employees of your organization and remove any that are outside of your organization. We appreciate your assistance in this matter.



Objectives

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

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Webinar Presentation Outline

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



Grant Overview

Program Total: \$467,957,734.04

Award Amount: Varies depending on project award

Project Period: March 3, 2021-October 31, 2026

- Funding has been authorized for eligible expenditures incurred by the Grantee during the performance period for this Grant which is between March 3, 2021 and October 31, 2026 or the date of exhaustion of funding for the purpose of this Grant as solely determined by OPB, whichever is earlier ("performance period").
- All expenditures must be incurred on or before October 31, 2026, and the Grantee must submit expenses for reimbursement through GeorgiaGrants during the performance period for this Grant by no later than December 31, 2026. The State will not be obligated to reimburse expenses incurred prior to or after the performance period.

Grantee Orientation Video:

https://www.youtube.com/watch?v=0KY5VN_iCD8



Allowable Use of Funds

- Although State Local Fiscal Recovery funds allows 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.
- The grantees final budget must be approved by OPB outlining allowable activities detailed in the competitive application submitted during the State Local Fiscal Recovery fund application process.
- Funds must be used in accordance with allowable expenses.
 Outside funds sources may be used for project costs outside the scope of the ARPA award but should not be included in the final budget submitted to OPB.



Federal Requirements, Uniform Guidance

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 and are outlined in an executed terms and conditions agreement to accept the award.

2 CFR 200 Highlights

- Recipients should familiarize themselves with all applicable requirements outlined in 2 CFR 200
- The grantee is responsible for ensuring that the activities under the award align to the federal guidelines and criteria outlined in the terms and conditions including but not limited to:
 - Procurement
 - Audits
 - Record Retention



Subpart D Post Federal Award Requirements

Procurement Standards

200.317 Procurements by states

200.318General procurement standards.

200.319 Competition.

200.320Methods of procurement to be followed.

200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

200.322Procurement of recovered materials.

200.323 Contract cost and price.

200.324 Federal awarding agency or pass-through entity review.

200.325Bonding requirements.

200.326Contract provisions.



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.



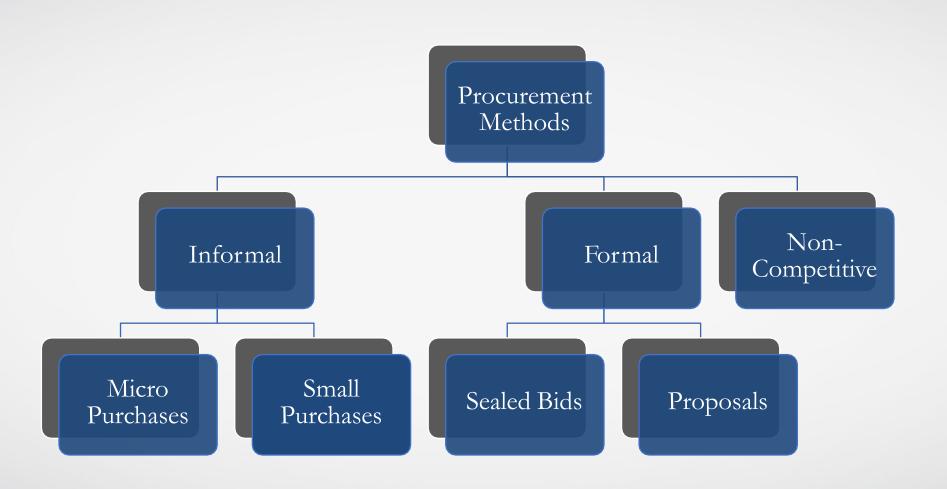
Subpart D Procurement

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 Methods





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.
	*updated from \$10,000		
	to \$50,000 but requires		
	documented justification		
2. Small Purchase	Up to \$250,000 **	Rate quotations from an	No cost or price analysis
		adequate number of	required
		qualified sources.	
3.Formal Procurement	>\$250,000 **	Primarily construction	Price is a major factor-
C. J. J. P. J.		projects-Firm fixed price	formal process for
a. Sealed Bid		contract.	bidding.
4. Formal Procurement	>\$250,000 **	A procurement method in	RFP with evaluation
b. Proposals		which either a fixed price	methods for an adequate
		or cost-reimbursement	number of qualified
		type <u>contract</u> is awarded.	sources.
		Proposals are generally	
		used when conditions are	
		not appropriate for the	
		use of sealed bids	
5.Formal Procurement	Available for	No competition	Must meet specific
c. Non-Competitive	procurements of any		circumstances including
	dollar amount		but not limited to the item
(Sole-Source)			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-



Subpart D Procurement

For **micro-purchase**, 2 CFR 200 threshold is \$10,000, but in November 2020, the regulation was updated to allow for the non-federal entity to increase that to \$50,000. The increase must have a documented justification of the the increase as shown below:

The non-Federal entity may self-certify a threshold up to \$50,000 on an annual basis and must maintain documentation to be made available to the Federal awarding agency and auditors in accordance with § 200.334. The self-certification must include a justification, clear identification of the threshold, and supporting documentation of any of the following:

- (A) A qualification as a low-risk auditee, in accordance with the criteria in § 200.520 for the most recent audit;
- (B) An annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or,
- (C) For public institutions, a higher threshold consistent with State law.



Other Requirements

- When possible, must use minority businesses, women's business enterprises, and labor surplus area firms
- As appropriate and consistent with law, provide preference for purchase, acquisition, or use of goods, products, or materials produced in the United States
- Various other contract provisions as outlined in Appendix II to 2
 CFR Part 200 these are items your statutory legal counsel should assist with.



Subpart D Post Federal Award Requirements

Subrecipient Monitoring and Management

200.330 Subrecipient and contractor determinations.

200.331Requirements for pass-through entities.

200.332 Fixed amount subawards.

Record Retention and Access

200.333 Retention requirements for records.

200.334Requests for transfer of records.

200.335 Methods for collection, transmission and storage of information.

200.336 Access to records.

200.337Restrictions on public access to records.



Auditees

200.508 Auditee responsibilities.

200.509 Auditor selection.

200.510Financial statements.

200.511 Audit findings follow-up.

200.512Report submission.



Single Audit Requirement

Single Audit Requirements.

Recipients and subrecipients that expend more than \$750,000 in Federal awards during their fiscal year will be subject to an audit under the Single Audit Act and its implementing regulation at 2 CFR Part 200, Subpart F regarding audit requirements.*

Note that the Compliance Supplement provides information on the existing, important compliance requirements that the federal government expects to be considered as a part of such audit. The Compliance Supplement is routinely updated, and is made available in the Federal Register and on OMB's website:

https://www.whitehouse.gov/omb/office-federal-financial-management/ Recipients and subrecipients

*For-profit entities that receive SLFRF subawards are not subject to Single Audit requirements. However, they are subject to other audits as deemed necessary by authorized governmental entities, including Treasury and Treasury's OIG. (Treasury Compliance and Reporting Guide, page 12)



2 CFR

- (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, but records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity, and Government Accountability Office (GAO).



- (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.

(h) For-profit subrecipient.*

1. When I log in, my award isn't showing under "My Grants." When will I be able to see my award status as awarded under "My Grants" to request reimbursement?

The onboarding process requires several steps. Once you have checked off all items on the list below, you will be able to access your list to request reimbursement for allowable expenses. Until you complete the items below, it will show as "accepted" under "My applications"

- ☐ DUNS and SAM number listed in Organizational Profile
- Signed Terms and Conditions
- ☐ Vendor Management and W-9 submitted to psvendor@sao.ga.gov
- ☐ GeorgiaGrants Access
- Final Budget Approval

2. Does Uniform Guidance apply to Water/Sewer funds for projects that have already begun?

Treasury allows grantees to request reimbursement for projects dating back to March 3, 2021. 2CFR policy requirements apply to 21.027 assistance listing for all Coronavirus State Recovery Funds and for ALL grantees awarded under OPB's Water/Sewer grant program.

- ✓ 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

Subrecipients will be required to evidence procurement of the contractor (even if performed before March 3, 2021) was done in compliance with 2 CFR, which states in 200.318 (i):

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.

3. Does NEPA apply to ARPA grants?

While NEPA is not applicable to ARPA State Fiscal Recovery Funds, the State Environmental Review Process (SERP) still applies.

4. Are match funds subject to restrictions of Interim or Final Rule?

Match funding is subject to whatever separate terms it was received under and is not subject to the restrictions of the final rule.



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 under Contacts By Grant Program.

For Grantees

Are you a new or existing grantee? We have several resources coming to support you and the success of your project.

You can access information on your grant via our **Grants Portal.**

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.



Step 1: DUNS and SAMS Registration



Step 2: Terms and



Step 3: Georgia Gran



Step 4: Vende

Click here for OPB Grants Division contacts by program.

CONTACTS BY GRANT PROGRAM

Click here for a list of active grant programs.

ACTIVE GRANT PROGRAMS

Click here for grant program documents, including budget worksheets and user

IMPORTANT DOCUMENTS



Step 5: Final Budget and Program Justification (Competitive Awards

.

Step 6: Submit Reimbursement Requests



1. DUNS and SAMS

DUNS Number

If your organization does not have a DUNS number, please visit the Dun & Bradstreet (D&B) website or call 1-866-705-5711 to register https://www.dnb.com/. This number is required for all awardees of American Rescue Plan Act Funds.

SAMS Number

The SAMs number is a federal requirement that must be completed in order to request a reimbursement for an awarded grantee. This process could take some time, so OPB strongly encourages applicants to begin today. https://sam.gov/content/home. Grantees will not be able to sign Terms & Conditions without having their DUNS and SAMS number available to enter into the form.



2. Terms and Conditions (T&C)

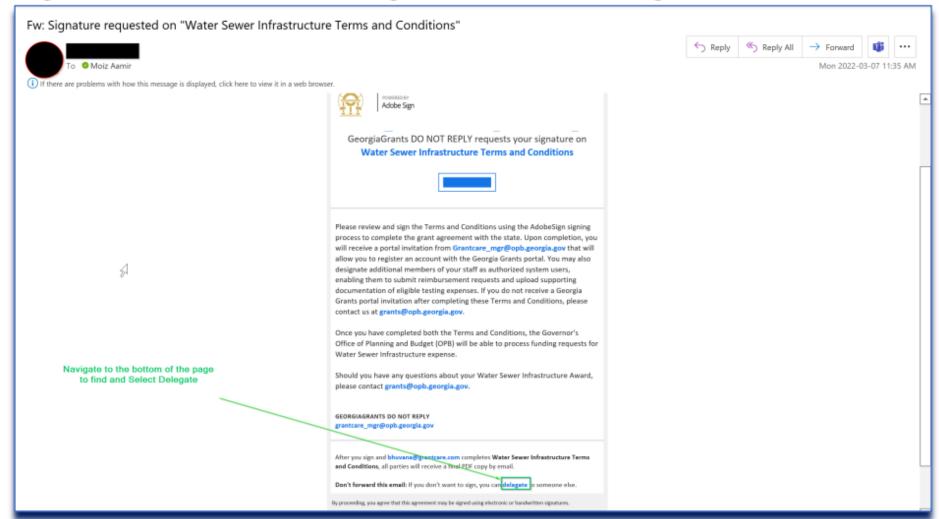
An agreement outlining the terms of your award called the Terms and Conditions will be sent to you after your award notification has been sent. While the timeframe for sending this differs by program, once sent, this document will need to be signed by an Authorized Official to accept the conditions of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

- T&Cs have gone out to POC in the account
- The Terms and Conditions email will come from echosign@echosign.com.
- Must be signed within 30 days from initial dissemination.
- User guide under important documents on the For Grantee website https://opb.georgia.gov/covid-response/grantees
- Users may delegate



Delegating Terms and Conditions

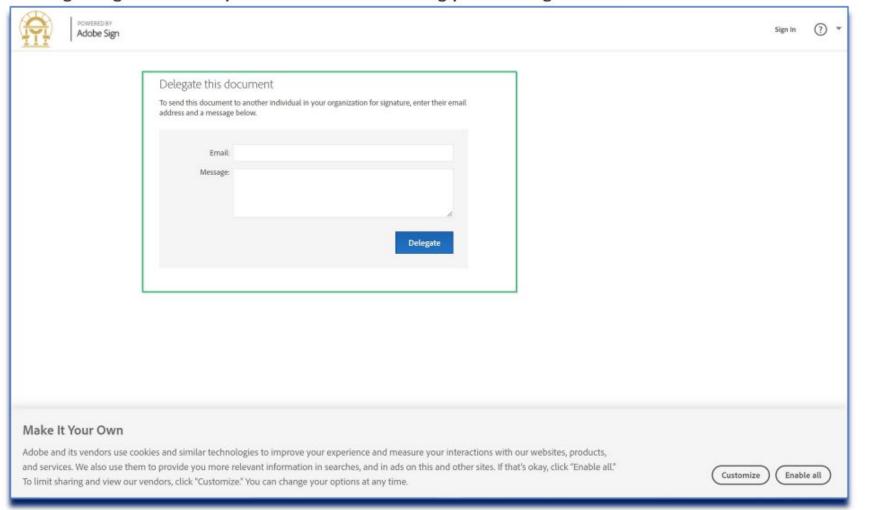
Navigate to the bottom of the email in the agreement details to find "Delegate" and click.





Delegating Terms and Conditions

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





Delegating Terms and Conditions Video



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 here.

CLICK HERE FOR VIDEO



4. GeorgiaGrants Portal Access

Awardees who created an account at the time of application will use this account to log in to https://cares.georgia.gov/. Once the terms and conditions are signed, your award will be visible under "My Grants" in the portal.

Award Points of Contact/T&C Signee may designate Authorized Users in the portal to submit reimbursements.

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



5. Vendor Management

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

Already a state vendor/supplier?

Complete Sections 2-4 & 6 of the attached <u>Vendor Management Form (VMF)</u>. Driver's license is NOT needed.

Section 3 must include the full bank account and routing number. Check only the 2nd box for "specific purpose." On that line, include "Grant Award Name" Section 4, select box "Add new Bank Acct." and "Other."

Section 6, write in "Grant Award Name: Validate Existing Bank Account." Submit VMF form to psychologisao.ga.gov. (Submitting to personal emails will delay processing.)



6. Vendor Management

Need to register as a state vendor/supplier?

Complete a Form W-9 (2018 IRS Updated version found at www.irs.gov or attached).

All sections should be complete.

Ensure your TIN/EIN number is correct.

Date of signature must be within the past 12 months.

Complete the attached <u>Vendor Management Form (VMF)</u>.

Complete Sections 2-4 only.

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 "Grant Award Name"

Section 4, select box "Add new bank account." and "Other"

Submit VMF and W9 forms to psychology (Submitting to personal emails will delay processing.)



7. Final Budget Approval

Before submitting reimbursement requests, OPB will request certain program awardees to submit a final program budget. This budget is project specific, not the city or county budgets.

Grantees will be assigned a programmatic grant specialist to review the budget and provide the final approval.

Grantees will receive final approval in communication from their Grant Specialist.

- Detailed Budget Worksheet
- Budget Worksheet Guide



7. Final Budget Approval

- 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. for projects that have already started 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.
- Detailed Budget Worksheet
- Budget Worksheet Guide



Budget Revision

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

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.



Change in Scope

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.



Budget Revisions

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

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Payment Request

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. Please ensure you submit each request under the appropriate file type to ensure it is not returned for revision.

Required Documentation

- 1. Payment Template
- 2. Supporting Documentation

Payments

- Payment requests will be made in GeorgiaGrants portal using the required template on the OPB website and the
- Funds will be dispersed through the bank account listed on the vendor management form submitted to State Accounting Office (SAO).
- 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.
- Timing of payments depends upon correct banking, signing of terms and conditions, and providing complete documentation
- All returns for revision notifications will be sent through the portal

Budget Categories

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



Payment Request Template

Governor's Office of Planning and Budget Payment Request Template Instructions

This template must be submitted in order for your payment to be processed.

General Template Instructions

The most expeditious way to receive payment is to ensure that template is completed accurately and supporting documentation is easily traced to the template. The template should not be modified in anyway. If the template is not submitted as designed by OPB, the payment request may be returned.

The total shown on the Payment Request Summary must agree with the amount requested for the DEXP.

Entering the data on each tab in order and with appropriate reference to the supporting documentation will expedite the review process.

Not every budget category provided in the template will apply to every grant or payment request. Complete the template as appropriate for the individual grant or payment request being submitted.

Expenses submitted for reimbursement should be entered into the template in alignment with the approved budget.

All applicable budget categories should be completed in a single template document for each payment request. Documentation should be uploaded by budget category and document type. Ensuring that the appropriate budget category and document type is selected when uploading payment request will be helpful during the review process.

Best efforts have been made to simplify and streamline the template and eliminate the need for individual grantee modifications. Cells and worksheets are protected to minimize changes to the template. If the number of rows on a sheet is not sufficient, please use a second template instead of additional rows. The number of rows should be sufficient for most requests.

NOTE: Formulas are utilized throughout the document and can not be modified by the grantee. Contact the grant specialist if there are any problems or concerns.

Payment Request Summary tab		est Summary tab	
Thi	is tab is used	I to obtain program and cor	ntact information and summarize data from the various tabs in this worksheet for the payment request.
1	Row 6	Grant Program Name	Enter the Program/Grant Name for the payment request
2	Row 7	Grant ID Number (GA- xxxxxx)	Enter the Grant ID associated with the payment request as GA-xxxxx with the respective numbers in place of xxxxxx
3	Row 8	Grantee Organization Name	Enter the Organization Name as shown on the grant award
4	Row 9	Contact Name	Enter the contact name for the person responsible for completing the payment request
	Rows 10,11,12	Contact Title, Email, Phone Number	Enter the title, email, and phone number for the contact on line 9 (lines 10,11,12)
6	Row 13	Date Range included in Payment Request	Enter the date range for expenses included in the payment request



Personnel

Salaries and wages for all personnel who will be working on the project should be included.

Justifications for payment requests should include rationale for any existing salaries paid with grant funds and documentation to support the intention to backfill positions for existing employees.

Detailed proof of payment is required. Payroll document should be provided for all personnel and fringes.



Personnel

Supporting Documentation Examples:

- Timesheets
- Payroll
- Daily Logs
- Personnel Policies
- Calculations



Equipment (Over \$5,000)

Non-expendable items.

The federal government defines permanent equipment as property with a purchase price of \$5000 or more and a useful life of two or more years. As such, expendable items costing less than \$5,000 should be included in the supply category.)

Detailed proof of payment and receipt are required.



Equipment (Over \$5,000)

Supporting Documentation Examples:

- Invoice for non-expendable items
- Inventory List
- Proof of Payment
- Equipment Rates
- Purchase Order



Supplies (Under \$5,000)

Non-expendable items.

Materials and supplies including consumable items such as office supplies, postage, training materials, copy paper, and expendable equipment items costing less than \$5,000 such as books, handheld tape recorders, etc.)

Detailed proof of payment and receipt are required.

Supporting Documentation Examples:

- Invoice for Supplies
- Inventory List
- Proof of Payment
- Purchase Order



Contracts, Consultants, and Subawards

Document field to provide information regarding subrecipients, procurement documentation and contracts, consultant cost breakdown, labor documentation.

Supporting documentation to demonstrate 2 CFR 200 procurement methods must be attached under procurement documentation to be reviewed.

Detailed proof of payment is required



Contracts, Consultants, and Subawards

Supporting Documentation Examples:

- Contract
- Invoice
- Procurement Documentation (Requests For Information, Request For Proposal, Request, For Quotation, Sole Source Justification, Documentation of Procedures, etc.)
- Labor Documentation
- Compliance with Historic Preservation Requirements
- Engineering Plans

Note: OPB's acceptance of documents does note denote final approval. OPB will collect procurement documentation as a condition to reimburse and to provide to Treasury, who has ultimate approval authority.

Other

Other

Other costs associated with the project that are not covered in OPB budget categories as assigned.

Detailed proof of payment and receipt (where applicable) is required.

Supporting Documentation Examples:

- Invoice
- Contract
- Template
- Rental Agreement



POC Updates

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

- 1. 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.
- 2. Instructions can be found on page 27 of our GeorgiaGrants Portal User Guide here:

https://opb.georgia.gov/document/document/georgiagrants-portal-user-guide/download.

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POC Updates

2. A new POC can fill out the point of contact change form found here:

https://opb.georgia.gov/document/document/poc-change-request-form-0/download.

Please note that the second option requires a signature from an authorized official within the requestor's organization or entity 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.

Reporting

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: https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf.

Guidance on reporting is forthcoming and will be provided via an additional webinar series.

Resources

Recipients may consult the following for more resources on compliance with IFR and the final rule:

- <u>State Local Fiscal Recovery Compliance and Reporting Guide</u>
- Statement Regarding Compliance with the Coronavirus State and Local Fiscal Recovery Funds Interim Final Rule and Final Rule
- <u>Final Rule</u>
- <u>Uniform Administrative Requirements, Cost Principles, and Audit Requirements</u> for Federal Awards ("Uniform Guidance" or 2 CRF Part 200)
- Compliance Supplement
- Please see the <u>Assistance Listing</u> in SAM.gov under assistance listing number (formerly known as CFDA number), 21.027 for more information.

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

Pre-Award

- 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

Post Award

- Enact strong document management and retention controls for all project related documentation, especially those related to commitments and expenditures
- For ease of information exchange, be prepared to provision system access to auditors (read / download only)
- Ensure high value contractors and their subcontractors are aware of the Fraud Monitoring program, and are responsive to requests for information
- Be prepared to cooperate! Our team is committed to working with your designated project representative(s) to develop reasonable response times to our information requests, and we will work hard to develop a seamless and efficient process for conducting audits.

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
- Mbps and locations served

N1 - Example, not a comprehensive listing



Procurement overview

Grantee

- Uniform Guidance 2 CFR and local jurisdictional procurement policies
- Full and open competition (2 CFR 200.320), sole source justification where allowed, documented audit trail for all awards
- Prioritization of high safety and training standards, certification, licensure, local workers, workers from historically underserved communities, and high labor standards, equity, domestic preference, etc.

Contractors, subcontractors, suppliers,

- Subcontracting plan must be included in contractor bid to Grantee
- Contractor must have documented audit trail for selection and award of subcontractors and suppliers
- Policies and procedures for notifying Grantee of new or modified subcontracts / obligations
- Federal passthrough requirements included in subcontracts / supplier purchase orders
- Contractors must have policies, procedures and documented audit trail to ensure and evidence compliance with Federal passthrough requirements (i.e. DBA, domestic preference, termination, Equal Employment Opportunity, Clean Air, etc.)



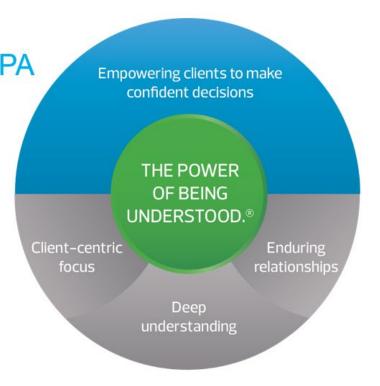




Who to reach out to with questions



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