Advancing Digital Opportunities to Promote Technology (ADOPT)

Equipment Distribution Projects

Subrecipient Onboarding and Post-Award Activities

Agenda: ADOPT Equipment Distribution Onboarding and Post-Award Activities

1. Federal Subrecipient Requirements Overview
    a. Single Audit Threshold Requirement
2. Federal Requirements for KOBD
    a. Required Monitoring Activities
    b. Transparency Act Reporting
3. Contract Review
4. Items Submitted to KOBD: Pre- and Post-Award
5. Reporting Requirements Overview
6. Monthly Reporting
7. Expenditure Reporting
8. Eligible Costs
9. Event Reporting
10. Closeout
11. Next Steps

Federal Funding Requirements for KOBD

Capital Projects Fund (CPF) General Overview

- Created by the American Rescue Plan
- Administered by the U.S. Treasury
- Subject to 2 CFR 200, 2 CFR 200 Subpart E Cost Principles, and US Treasury Program Guidance

Select KOBD Requirements:

- Subrecipient Risk Assessment and Monitoring
  - ✓ In addition to monitoring monthly expenditure and progress reports, subrecipient monitoring may include desk reviews and on-site monitoring visits
- Compliance with the Federal Funding Accountability and Transparency Act (FFATA)
  - ✓ Data will be reported to the portal at FSRS - Federal Funding Accountability and Transparency Act Subaward Reporting System

Federal Funding Subrecipient Requirements

Capital Projects Fund (CPF) General Overview

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Select Federal Requirements for Subrecipients

- Financial management system that tracks each federal fund source's revenue and expenditures separately and does not co-mingle funds
- Time and Effort maintenance for all employees paid with federal funds
- Single Audit Requirement
- Audit related information may be required by KOBD
- Funds cannot be used as match for non-federal grants
- Maintain a Conflict of Interest Policy and disclose in writing potential conflicts of interest to KOBD
- Retain grant project records for 5 years after the project end date
- Maintain registration in SAM.gov

Single Audit Requirement

Overview

- Organizations that expend over $750,000 in federal funds during their fiscal year are subject to a Single Audit.
    - ✓ On 10/1/2024, the threshold increases to $1 M
- See 2 CFR 200.514
- If your organization is subject to the single audit requirement, provide KOBD with most recent completed single audit and any material findings and final responsive documents
- Entities that do not meet the threshold must make records available for review or audit by KOBD or federal agencies.
- Submit the most recent single audit upon contract execution and annually thereafter, as applicable.

Contract Review

Select Contents and Attachments

- Contents
  - Federal and state required information
  - Reporting and reimbursement requirements
  - Required deliverables (closeout)
- Attachments
  - Approved Application
  - Approved Budget
  - Program Guidelines
  - Standard Report Template

The entity named in the contract, in the UEI registration in SAM.gov, and the W-9 must be the same.

Submit to KOBD

Before Contract Execution	After Contract Execution
✓ 3 State of Kansas Required Contract Attachments ✓ Valid W-9 ✓ ACH Payment Authorization Contact Information ✓ Risk Assessment Questionnaire ✓ Contact information for primary contact and technical contact Note: Remember to check and maintain your UEI at SAM.gov	✓ Single Audit ✓ Internal controls policies and procedures ✓ Accounting system compliance with segregated expenditures ✓ Conflict of Interest policy ✓ Organization chart ✓ FFATA reporting form

Updates for most of these items will be requested at least annually

Reporting Requirements

The grant period ends two years following the date of your executed grant agreement

Eligible expenses can start as early as the contract execution date, with project completion no later than 24 months from the contract execution date

Subrecipient reporting categories:

Submit monthly program and financial reports by the 5th of every month.	Inform KOBD of recipient organization changes or proposed material changes prior to implementing the change	Participate in subrecipient monitoring activities at the request of KOBD	Attend quarterly calls with the KOBD office to discuss project progress	Submit a completed closeout report within 45 days of project completion.

Report Types:

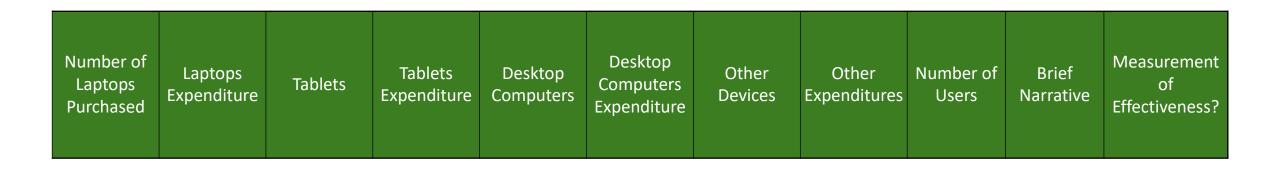| Monthly Template	Event Reporting and Change Request Forms	Varies Per Request	Varies Per Request	Closeout Report

Monthly Reporting

Via Submittable.com by the 5th of each month

- If the 5th is a weekend, submit by the following Monday
- The report will cover the prior month and is cumulative
- First monthly report is due by the 5th of the month after the contract is executed
- Monthly reports received after the 5th may be paid out the following month

Reports will include:

- Narrative
- Expenditures and proof of payment
- Completion Status (contractual metrics)
- Federal metrics data
- Success Stories

Example of Monthly Reporting Performance Elements

Number of Laptops Purchased	Laptops Expenditure	Tablets	Tablets Expenditure	Desktop Computers	Desktop Computers Expenditure	Other Devices	Other Expenditures	Number of Users	Brief Narrative	Measurement of Effectiveness?

- Each item will be reported initially and updated with actuals monthly and at project closeout.
- Other measures of effectiveness may be required or optional, based on your individual application, final agreement, or US Treasury requirements.
- Additional monthly reporting includes expenditures, narrative, progress toward and milestones

Expenditure Reporting

Included in the monthly report

- Amount of reimbursement request
- Invoices with allowable purchases
- Proof of payment for each invoice
- KOBD encourages regular monthly reimbursements

Reimbursement Process

- KOBD holds 10% of the grant amount until final closeout is complete
- Reimbursements are processed by the end of each month as long as all required information is received from the subrecipient
- ACH payment is preferred
- WOB will work with you when additional information is needed

Eligible Costs

Cost Eligibility Criteria

- Are considered eligible according to the <u>2 CFR 200 Subpart E Cost Principles</u>, Treasury Department's regulations, and the ADOPT Program Guidelines.
- Are both reasonable in nature and amount, and necessary to carry out the project.
- Are consistent with policies and procedures that apply uniformly to the subrecipient's activities.
- Are allocated to the grant in accordance with the relative benefit received by the grant project.
- Be determined in accordance with <u>generally accepted accounting principles (GAAP)</u>
- Occur during the subaward's period of performance
- Are included in the approved budget
- Do not exceed budgeted amounts, except for a maximum 10% variance, unless a budget revision has been approved
- Are supported by proof of purchase, proof of payment and other documentation.

Event Reporting and Material Project Changes

Grantee shall notify Commerce within 10 days

- Any significant change in the financial position of the grantee
- Changes in the ownership of the grantee entity
- Any change in key project personnel or contact information of key project personnel
- Event Reporting Form emailed to KDC_broadband@ks.gov

"Material Project Changes" require pre-approval

- Expenditures incurred without prior approval from KOBD may be unallowable and may not be reimbursed
- KOBD will provide an initial response within 3 business days
- Examples: Any deviation from the original approved plan including services outside the approved project area or targeted population, electronics manufacturer and model number changes from original bill of material, budget variances greater than 10% for any line item.
- Change Request Form emailed to KDC_broadband@ks.gov

Quarterly Meetings

Up to 4 times per year

- January, April, July, October
- Monitor progress toward implementation

Agenda to include:

- Overview of project status and progress toward implementation
- Project-specific technical assistance as needed
- Achievements and concerns

Project Closeout Requirements

Via Submittable.com

- A narrative overview including successes, challenges, partners involved, and the overall impact of the project.
- Final metrics as required by the grant program.
- A closeout budget report providing detailed descriptions of all final project expenditures with supporting invoices and proofs of payment for grant funds, matching funds, and in-kind contributions
- Success stories

Closeout Meeting

- A final interview to review the closeout report submission and share relevant information related to the project and its impact.

Additional Reporting

Additional Reporting As Requested

- Provide reports and information as requested by Commerce.

Next Steps

Review the pre-award forms:

1. Complete the Risk Assessment Questionnaire.

2. Sign the three State of Kansas Standard Contract documents.

3. Fill out and sign the W-9.

Once you have completed the above forms, return them to marie.e.mcneal@ks.gov

Once you agree with the contents of the agreement, inform Marie via email.

Marie routes agreement for signature in DocuSign.

After KOBD executes the agreement, complete and return the required post-award documents.

Questions?

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