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Robin M Partour

Department of Transportation

FINANCIAL ASSISTANCE REQUIREMENTS FOR GRANT DISBURSEMENT AGREEMENTS

AUTHORITY: Section 20.23(3)(a) and 334.048(3), Florida Statutes (F.S.)

REFERENCES:

2 CFR 200.331-332 and Subpart F—Audit Requirements

215.97, F.S., Florida Single Audit Act

215.971, F.S., Agreements funded with state or federal assistance

216.3475, F.S., Maximum rate of payment for services funded under General

Appropriations Act or awarded on a noncompetitive basis

Ethics Policy No. 001-010-020

<u>Chapter 69I-5, F.A.C.</u>, Rules of the Department of Financial Services – Schedule of

Expenditures of State Financial Assistance

Chapter 10.550, Rules of the Auditor General

CFO No. 06 (2011-2012) Contract Monitoring and Documenting Contractor

Performance

CFO No. 02 (2012-2013) Contract and Grant Reviews and Related Payment

Processing Requirements

CFO No. 03 (2014-2015) Compliance Requirements for Agreements

Procedure No. 350-020-301, Financial Provisions for Department Funded Agreements,

Disbursement Handbook for Employees and Managers

Federal Aid Technical Bulletin 21-01 (FFATA)

Work Program Instructions

PURPOSE:

To define responsibilities within the Florida Department of Transportation (Department) for agreements funded with state and federal financial assistance.

SCOPE:

The procedure's primary users are Central Office Grant Program Administrators (Program Administrators) and Grant Managers responsible for administering state and federal financial assistance passed through to local government entities, non-profit organizations, for-profit organizations, and other state agencies.

1. ROLES AND RESPONSIBILITIES

1.1 STATEWIDE FINANCIAL ASSISTANCE COORDINATOR

The Statewide Financial Assistance Coordinator is responsible for ensuring the Department's compliance with Department of Financial Services requirements for agreements funded with state and federal financial assistance. This includes receiving and reviewing all single audit reporting packages for each recipient of financial assistance.

1.2 CENTRAL OFFICE GRANT PROGRAM ADMINISTRATORS (PROGRAM ADMINISTRATORS)

These positions are responsible for providing policies and procedures for the administration of specific grant programs, including federal and/or state program requirements, contract management requirements and guidance for risk assessment and monitoring plans, as well as Quality Assurance Reviews (QARs) to ensure compliance.

1.3 GRANT MANAGERS

These positions are responsible for managing the contracts between the Department and the subrecipients. Contract management includes adherence to program requirements outlined in the agreements and review and approval of invoices, during the award monitoring and close out of the agreement.

2. FINANCIAL ASSISTANCE

Financial assistance is federal or state resources provided to a recipient to carry out specific program requirements.

2.1 FEDERAL AWARDS

Federal financial assistance is a federal award that a non-federal entity receives directly from a federal awarding agency or indirectly from a pass-through entity. Federal financial assistance includes grants, cooperative agreements, non-cash contributions or donations of property (including donated surplus property), direct appropriations, and other financial assistance.

The Department receives most of its federal awards directly from the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and the National Highway Traffic Safety Administration (NHTSA). The Department uses most of the federal awards received on contracts (vendor agreements) for professional and construction services; however, the Department is a pass-through entity that provides federal financial assistance for local infrastructure improvements, transit systems, and safety initiatives.

2.2 CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA)*

*2 CFR 200.1 renamed the CFDA Number to Assistance Listing Number and defines it as a unique number assigned to identify a Federal Assistance Listings. The State of Florida documentation and systems still refer to it as CFDA.

The Catalog of Federal Domestic Assistance (CFDA) is a comprehensive listing of federal programs available to state and local governments (including the District of Columbia), federally-recognized Indian tribal governments, territories (and possessions) of the United States, domestic public, quasi-public and private profit and nonprofit organizations and institutions, and specialized groups and individuals. The catalog contains detailed program descriptions, including authorization, objectives, types of assistance, uses and restrictions, eligibility requirements, and application and award process.

A CFDA number is the number assigned to a federal program in the catalog. The CFDA number is used to track the awards through the Florida Accounting Information System (FLAIR) and in the subrecipient's single audit report. The Department's federal award programs typically begin with the CFDA number 20.xxx. The Statewide Financial Assistance Office maintains a list of active CFDA programs passed-through the Department on their SharePoint site: https://fldot.sharepoint.com/sites/FDOT-OOC/CGFM/Grants/Lists/CFDACSFA%20Grant%20Programs/AllItems.aspx

If a new federal program is received by the Department that will be passed through to a subrecipient, notify the Statewide Financial Assistance Office to add it to the SharePoint site and ensure it is set up in compliance with the requirements set forth in this procedure.

2.3 FEDERAL AWARD IDENTIFICATION

2 CFR 200.332 (1) requires agreements funded with federal financial assistance to include the information below. The Program Administrator and Grant Manager are responsible for ensuring the agreement includes the required information for federal awards.

- (i) Subrecipient name (which must match the name associated with its unique entity identifier).
- (ii) Subrecipient's unique entity identifier.

- (iii) Federal Award Identification Number (FAIN).
- (iv) Federal Award Date
- (v) Subaward Period of Performance Start and End Date.
- (vi) Subaward Budget Period Start and End Date.
- (vii) Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient.
- (viii) Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current financial obligation.
- (ix) Total Amount of the Federal Award committed to the subrecipient by the pass-through entity.
- (x) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA) <u>See Federal Aid Technical Bulletin 21-01 (FFATA)</u>.
- (xi) Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity.
- (xii) Assistance Listings number and Title; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listings Number at time of disbursement.
- (xiii) Identification of whether the award is R&D; and
- (xiv) Indirect cost rate for the Federal award (including if the de minimis rate is charged)

2.4 STATE FINANCIAL ASSISTANCE

State financial assistance encompasses resources provided to subrecipients for carrying out state programs, and includes cooperative agreements, direct appropriations, non-cash assistance, grants, insurance, investments, loans, loan guarantees, property, tax credits, and tax refunds. State financial assistance does not include federal awards, state matching on federal programs, or procurement contracts (vendor agreements) used to buy goods or services from vendors.

The Department manages several state grant programs authorized in Florida Statutes or General Appropriations Act by specific appropriation. The programs provide financial assistance for aviation development, seaport projects, transit systems, and local infrastructure improvements.

2.5 CATALOG OF STATE FINANCIAL ASSISTANCE (CSFA)

The Catalog of State Financial Assistance (CSFA) is a comprehensive listing of state financial assistance programs that contains the responsible state agency, standard state program number identifier, official title, legal authorization, and description of the program. It also provides objectives, restrictions, application and awarding procedures, and other relevant information.

A CSFA number is the number assigned to a state program in the catalog. Rule 69I-5.005, F.A.C., provides guidance on evaluating applicability of the Florida Single Audit Act to a state program for inclusion in the catalog. To establish a CSFA number, the Program Administrator works with the Statewide Financial Assistance Office to complete the State Project (Program) Determination Checklist, CSFA Request Form, and Compliance Supplement.

The Compliance Supplement is used by subrecipients' independent auditors to determine risk when conducting an audit. The Program Administrator must include procedures and compliance requirements, such as allowable costs, eligibility, matching, and reporting for the independent auditors to use when performing their audit of the subrecipients. The Compliance Supplement is included by reference in the grant disbursement agreement in the Single Audit Exhibit.

The CSFA number is used to track the awards through FLAIR and in the subrecipient's single audit report. The Department's state grant programs typically begin with the CSFA number 55.xxx.

Pursuant to Rule 69I-5.005(4), F.A.C., state agencies are required to annually certify the accuracy and completeness of their state programs included in the CSFA. The Statewide Financial Assistance Office is responsible for filing the certification. The Statewide Financial Assistance Office coordinates with Program Administrators to identify any additions, deletions, or changes applicable to the current fiscal year's catalog information. The Statewide Financial Assistance Office maintains a list of active CSFA programs on their SharePoint site: https://fldot.sharepoint.com/sites/FDOT-OOC/CGFM/Grants/Lists/CFDACSFA%20Grant%20Programs/AllItems.aspx

3.0 VENDOR DETERMINATION

The Department's Work Program is tracked in the Work Program component of the Financial Management System. Before a project can be included ("programmed") in the Financial Management System, it must be determined if the funding will be provided to a vendor/contractor or a subrecipient.

3.1 VENDOR/CONTRACTOR (VENDOR)

A vendor provides goods or services for the Department's own use. The Department's vendor agreements include maintenance and construction contracts, contractual and professional services agreements, and joint participation agreements. Joint participation agreements (JPAs) are typically vendor agreements with local agencies to provide goods or services such as utility, lighting, and signal maintenance on the State Highway System. These agreements are <u>not</u> providing state and/or federal financial assistance and a grant disbursement agreement is not required.

3.2 RECIPIENT/SUBRECIPIENT (SUBRECIPIENT)

A subrecipient is responsible for carrying out the activities of a particular program. Subrecipients include local government entities and non-profit or for-profit organizations. Subrecipients receive state or federal financial assistance directly from the Department and are subject to the single audit requirement.

3.3 DETERMINATION AND DOCUMENTATION

The Department makes most determinations by program category, but occasionally a determination must be completed for a new grant program, a discretionary grant, or a vendor agreement. For state financial assistance, the determination is made using the Florida Single Audit Act Checklist for Non-State Organizations-Recipient/Subrecipient vs. Vendor Determination. For federal financial assistance, the requirements for determination are in 2 CFR 200.331.

The state and federal subrecipient determination forms are available and maintained on the Statewide Financial Assistance SharePoint page for each program: https://fldot.sharepoint.com/sites/FDOT-
OCC/CGFM/Grants/Lists/CFDACSFA%20Grant%20Programs/AllItems.aspx

The Statewide Financial Assistance Coordinator is available for assistance in completing determinations.

3.4 PROGRAMMING

The <u>Work Program Instructions</u> include the required financial programming for each state and federal grant program. Financial project numbers for grant disbursement agreements have the following key elements:

Phase type 4 and Contract Class 2, or Phase type 8 and Contract Class 5 (Local Agency Program)

4.0 RISK ASSESSMENT AND MONITORING PLANS

CFO No. 06 (2011-2012) Contract Monitoring and Documenting Contractor

Performance and 2 CFR 200.332 (b) require each state and federal grant program to have a process for assessing risk and developing an appropriate monitoring plan for each agreement. The risk assessment and monitoring plan are the responsibility of the grant manager.

Risk assessment may include, but is not limited to:

- Size of the award
- Complexity of the award
- Subrecipients experience and expertise
- Subrecipients past performance
- Timely invoicing
- Turnover
- Single audit results

Monitoring plans should be developed prior to execution of grant disbursement agreements and take into consideration the results of the risk assessments. Monitoring plans include financial and program monitoring. Financial monitoring includes review and approval of invoices. Program monitoring includes assurances that the subrecipient is satisfactorily meeting the program requirements. Monitoring activities can range from desk procedures to site visits depending on the program requirements and the complexity of the program. An example of a Risk Assessment and Monitoring Plan is included in Attachment A. All risk assessment and monitoring activities should be documented in contract files.

If the subrecipient is not meeting the financial or program requirements, a corrective action plan should be developed. Future awards could be impacted for recipients that are classified as high risk and/or do not satisfy the corrective action requirements.

5.0 GRANT DISBURSEMENT AGREEMENTS

Grant Disbursement Agreements (GD) are agreements used to provide state or federal financial assistance to a subrecipient. The subrecipient is subject to programmatic requirements provided in the CSFA or CFDA described above. In addition, Section-215.971, F.S., requires agreements funded with state or federal assistance to include the following provisions. These requirements are also outlined in Topic No. 350-020-301, Financial Provisions for Department Funded Agreements:

- (a) A provision specifying a scope of work that clearly establishes the tasks that the subrecipient is required to perform.
- (b) A provision dividing the agreement into quantifiable units of **deliverables** that must be received and accepted in writing by the agency before payment. Each deliverable

must be directly related to the scope of work and specify the required minimum level of service to be performed and the criteria for evaluating the successful completion of each deliverable.

- (c) A provision specifying the **financial consequences** that apply if the subrecipient fails to perform the minimum level of service required by the agreement.
- (d) A provision specifying that a subrecipient of state or federal financial assistance may expend funds only for **allowable costs** resulting from obligations incurred during the specified agreement period.
- (e) A provision specifying that any balance of **unobligated funds which has been** advanced or paid must be refunded to the state agency.
- (f) A provision specifying that any funds paid in excess of the amount to which the subrecipient is entitled under the terms and conditions of the agreement must be refunded to the state agency.

Pursuant to Rule 69I-5.006(3), F.A.C., whenever an entity is determined to be a subrecipient of a federal and/or state financial assistance, the standard audit language contained on Form DFS-A2-CL must be included in the agreement. The standard language is available on the Statewide Financial Assistance SharePoint site: https://fldot.sharepoint.com/sites/FDOT-OOC/CGFM/Grants/Single%20Audit%20Contract%20Language/Forms/AllItems.aspx

Or, at the following link: https://apps.fldfs.com/fsaa/documents/contract_language.doc.

In addition, each agreement must include a Single Audit Exhibit that provides the information for the CSFA and/or CFDA number including; the official title; legal authorization; objectives; restrictions; and a link to the compliance supplement for the auditors. The required exhibits for each program are maintained on the Statewide Financial Assistance SharePoint site: https://fldot.sharepoint.com/sites/FDOT-OOC/CGFM/Grants/Shared%20Documents/Forms/AllItems.aspx

5.1 COST ANALYSIS

<u>Section 216.3475, F.S.</u>, requires agencies to maintain records to support a cost analysis (or budget analysis) for grant disbursement agreements. Detailed budgets or estimated project costs are required to be evaluated as per the certification statement below prior to programming and awarding the funding. The Schedule of Financial Assistance includes the budgeted expenditures by category. The following certification statement must be included on the Schedule of Financial Assistance or in the contract file:

I certify that the cost for each line item budget category has been evaluated and
determined to be allowable, reasonable and necessary as required by Section
216.3475, F.S. Documentation is on file evidencing the methodology used and the
conclusions reached.

Name	
Signature	
Title	
Date	

5.2 FLORIDA CERTIFIED CONTRACT MANAGER (FCCM or GRANT MANAGER)

<u>Section 215.971(2), F.S.</u>, requires each agreement funded with state or federal financial assistance to designate an employee to function as a grant manager. The manager is responsible for enforcing performance of the agreement's terms and conditions and serves as a liaison with the subrecipient.

The grant manager is recorded in the Contact Funds Management System (CFM) and his or her contact information must be communicated to the subrecipient.

Effective December 1, 2014, each grant manager responsible for agreements in excess of \$100,000 annually must complete training and become a Florida Certified Contract Manager (FCCM) as required by Section 287.057(14)(b), F.S. The Department requires all grant managers to complete the training, regardless of dollar thresholds. The Procurement Office is responsible for ensuring that contract and grant managers are registered for training. The Statewide Financial Assistance Office provides the Procurement Office with a list of grant managers that is updated quarterly or as notified for new hires.

Once training is complete, certification is valid for five years or until the expiration date shown on the certificate, whichever is later.

5.2.1 CONFLICT OF INTEREST AND REQUIRED DISCLOSURE OF RELATED PARTY TRANSACTIONS

In accordance with Sections <u>112.311</u> and <u>334.193</u>, F.S., a grant manager should be independent and have no conflict of interest with an entity that he or she is directly responsible for managing and monitoring. Each year, in accordance with generally accepted accounting principles, the Department is required to disclose any related party transactions. For additional information, please refer to <u>Policy No. 001-010-020</u>, <u>Ethics Policy</u>.

6.0 FUNDS APPROVAL

Funds approvals for grant disbursement agreements are required to be obtained in accordance with Procedure No. 350-020-200, Contract Funds Management - Funds Approval, and the Office of Comptroller's Contract Funds Management (CFM) User Manual.

The funds approval process requires the use of an object code. Grant disbursement agreements are assigned specific object codes. Federally funded projects have a **78xxxx** code, while state funded projects have a **75xxxx** code. Object codes available are listed below:

75****	State Financial Assistance				
751000	STATE FINANCIAL ASSISTANCE - GENERAL				
751003	STATE FINANCIAL ASSISTANCE - ADVANCE				
751100	STATE FINANCIAL ASSISTANCE - LOANS				
78****	Federal Financial Assistance				
780000	FEDERAL FINANCIAL ASSISTANCE - GENERAL				
780003	FEDERAL FINANCIAL ASSISTANCE - ADVANCE				
780005	FEDERAL FINANCIAL ASSISTANCE - BETWEEN AGENCIES				
780100	FEDERAL FINANCIAL ASSISTANCE - LOANS				

The funds approval process also requires use of an appropriate CSFA or CFDA number as described in **Section 2.2** or **Section 2.4**, as well as a contract type. For grants, the contract type is GD, Grant Disbursement.

Occasionally, an agreement will blend multiple grant programs together. These programs can be included on one agreement but must be broken out on separate encumbrance lines using the correct CSFA or CFDA number. The agreement must also include a Single Audit Exhibit referenced in **Section 4** for each program.

Some programs authorize state matching funds to meet federal financial participation matching requirements. These funds are <u>not</u> considered financial assistance and they require a separate object code (740100) and contract type (AK, Project Participation). These agreements are <u>not</u> grant disbursement agreements and they do <u>not</u> require single audit language <u>or</u> a CSFA or CFDA number.

74***	Aid to Others
740100	AID TO OTHERS – GENERAL

6.1 CFM FACTS

After the funds approval process is complete, contract images must be uploaded within 30 days of execution of a new contract, or within 30 days of a major change to a contract. A major change to a contract includes but is not limited to, contract renewal, termination, extension, amendment or modification to the terms of the contract; and issuance of a task work order or Memorandum of Agreement/Memorandum of Understanding.

7.0 SINGLE AUDIT REQUIREMENTS

A single audit must be conducted in accordance with <u>Section 215.97 F.S.</u>, and/or <u>2 CFR Part 200</u>, <u>Subpart F</u> if the subrecipient expends a total amount of federal awards and/or state financial assistance greater than \$750,000 or more. All sources, including noncash assistance, must be considered as financial assistance when determining whether a subrecipient met the single audit threshold. The thresholds for federal awards and state financial assistance are calculated separately. An audit conducted in accordance with <u>Section 215.97</u>, <u>F.S.</u>, is in addition to any audit of federal awards required by the <u>2 CFR Part 200</u>, <u>Subpart F</u> and other federal laws and regulations.

In accordance with <u>Rule 10.558(3)</u>, <u>Rules of the Auditor General</u>, audit reports of state financial assistance must be submitted to the Auditor General and state awarding agency within 45 days after the independent auditor delivers the audit report to the auditee (subrecipient), but no later than nine (9) months after the end of the fiscal year of the auditee.

In accordance with <u>2 CFR 200.512</u>, audits of federal awards must be submitted within the earlier of 30 calendar days after receipt of the audit report, or nine months after the end of the audit period to the <u>Federal Audit Clearinghouse</u>.

Subrecipients who expend less than \$750,000 per fiscal year in federal awards and/or state financial assistance, from all sources, are exempt from federal and/or state single audit requirements for the concurrent fiscal year. Subrecipients are required to submit an exemption notification letter within nine (9) months after their fiscal year-end if total federal awards and/or state financial assistance expended from all sources were under the \$750,000 threshold.

7.1 SINGLE AUDIT REVIEW

The standard language in **Section 4.0** requires all single audit reporting packages to be submitted to the Statewide Financial Assistance Office. The Statewide Financial Assistance Office is responsible for receiving and reviewing the single audit reporting packages, including the management letters and corrective action plans, to the extent necessary to determine whether timely and appropriate corrective action has been taken with respect to audit findings and recommendations pertaining to state and federal financial assistance that was provided by the Department. The review and related documentation is maintained in the <u>Single Audit Reporting Application (SARA)</u>.

A corrective action plan must be included in the audit report for findings and/or questioned costs. If it is determined that findings and/or questioned costs represent a risk to Department funding, the Statewide Financial Assistance Office coordinates the issuance of a management decision letter with the appropriate Program Administrator within six (6) months of receiving the subrecipient's audit report to ensure that timely and appropriate action was or will be taken to correct the audit findings. The management decision must be signed by director level or above and must clearly state:

- Whether the audit findings are sustained;
- The reasons for the decision; and
- The expected subrecipient action to repay disallowed costs, make financial adjustments, or take other action.

The Program Administrator may specify corrective action requirements for the subrecipient, if needed. If corrections are not made in a timely manner, the Program Administrator, in consultation with the Grant Manager and the Office of General Counsel, may consider the following actions:

- Temporarily withhold cash payments pending correction of deficiency
- Disallow all or part of cost of activity or action not in compliance
- Partially suspend award
- Wholly terminate award
- Withhold further awards for project or program
- Recommend for suspension or debarment proceedings

Other

If a subrecipient fails to submit a single audit to the Department in accordance with <u>Section 215.97, F.S.</u>, or <u>2 CFR 200, Subpart F</u>, the Statewide Financial Assistance Office will take appropriate corrective action to enforce compliance. Through consultation with the Program Administrator, necessary action can be determined. This includes, but is not limited to, legal action, and/or the withholding of federal and/or state funds.

8.0 INVOICING

The method of payment for the Department's grant disbursement agreements is cost reimbursement. The subrecipient is reimbursed for allowable and budgeted expenditures that are directly related to the Scope of Work. Allowable expenses must be expressed or implied by federal or state statute or rule. The Department of Financial Services Reference Guide for State Expenditures and Disbursement Handbook for Employees and Managers also includes authoritative guidance on allowable costs. When there is a conflict between federal and state authority, the more restrictive guidance is applied.

Invoices for cost reimbursement contracts must be supported by an itemized listing of expenditures by category (salary, travel, expenses, etc.). Supporting documentation shall be submitted by the subrecipient for each amount for which reimbursement is being claimed, indicating that the item has been paid. Check numbers may be provided in lieu of copies of actual checks. Each piece of documentation should clearly reflect the dates of service. Only expenditures for categories in the approved agreement budget may be reimbursed. These expenditures must be allowable (pursuant to law) and directly related to the services being provided.

The Grant Manager is responsible for reviewing and approving the invoice for payment using the Form No. 350-060-02, Summary of Contractual Services

Agreement/Purchase Order Receiving Report and Invoice Transmittal. Supporting documentation must be maintained on file for post audit review.

8.1 ALTERNATIVE ADVANCED PAYMENT

Pursuant to <u>Section 334.044(29), F.S.</u>, the Department's Comptroller may approve alternative advance payments for grant disbursement agreements with governmental entities. Alternative Advance Payment allows the subrecipient to invoice prior to payment. The agreement must be modified to include Alternative Advance Payment Financial Provisions in accordance with the requirements outlined in <u>Topic No. 350-020-301</u>, <u>Financial Provisions for All Department Funded Agreements</u>. The process for requesting and obtaining approval for alternative advance payments is included in the <u>Disbursement Handbook for Employees and Managers</u>.

8.2 INDIRECT COSTS

Indirect costs may be allowable for reimbursement, but the rate must be included in the grant disbursement agreement and the subrecipient must have a state or federally approved indirect cost allocation plan or a de minimis rate supporting the rate paid.

Per <u>Appendix VII to 2 CFR 200</u>, if the subrecipient of federal financial assistance only receives funds from a pass-through entity, the pass-through entity will be responsible for negotiating and/or monitoring the subrecipient's indirect costs. Indirect Cost Plans must be submitted to the Statewide Financial Assistance Coordinator for review and approval.

9.0 CLOSE OUT

Prior to close out, the grant manager shall ensure that the items included in the scope of work were met, deliverables were accepted, and all allowable costs were paid. Once complete, the contract status should be changed to "closed" in CFM.

10. TRAINING

Grant Disbursement Training CBT Florida Certified Contract Manager

11. FORMS

The following forms are available from the Department's Forms Library.

Form No. 350-060-02, Summary of Contractual Services Agreement/Purchase Order Receiving Report and Invoice Transmittal

Grant Manager Signature: _

ATTACHMENT A

Recipient Risk Assessment and Monitoring Plan

[PROGRAM AREA NAME]

Florida Department of Transportation

Agend	cy/Organization:		т			
CFD/	A/CSFA Number:		Program Name:			
Pro	· · · · Descriptions					
Proj	ject Description:	 				
	Total Award	\$0.00		Required Match?	Yes or No	
	Total Project	\$0.00		Total Match	\$0.00	
	Total Trojes.	30.00		Total H.D.C.	30.00	
		_			of the program. Programs that	
					rement experience. Programs	
provide op	erating funds mu	st take into consid	leration their finance	cial management sys	item.	
Risk Level	Τ	Criteri	ria		Monitoring Plan	
Low	1. No program	related single audi	it findings	1. Revi	Review invoice	
	2. No programn	matic issues		2. Revi	iew Project Monitoring Report	
	3. Prior experie	ence with program	or similar program	1.		
			-			
/loderate	1. Exempt from	n Single Audit or re	esolved program rel	lated 1. Revi	iew invoice	
	single audit f	findings				
	2. Limited expe	experience			Review Project Monitoring Report	
					3. Technical Assistance as needed	
				•		
High	Unresolved program related single audit findings			1. Revi	1. Review invoice	
	2. No experience			2. Revi	ew Project Monitoring Report	
	3. High employ	ee turnover		3. Site	visit	
				4. Tech	4. Technical Assistance required	
	1					
Risk Leve	el Determination:	Low M	floderate High	Decision to Awa	ard: Yes No	
	Comments:					

Date: __