



Program and Grants Offices

# COMMON GRANTS QUESTIONS AND COMPLIANCE

**SLIGP** State and Local Implementation Grant Program

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# Agenda

- Quarterly Reporting
- Monitor Match Proportionality
- Subrecipient Guidelines
- Human Subjects Research (HSR) Protection
- Audit requirements
- Award modifications
- Site visits
- Questions and Answers
- Contact Information



# QUARTERLY REPORTING

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## Required Reports

During the period of performance, the recipient shall submit performance progress and financial reports on a calendar year quarterly basis for the period ending March 31, June 30, September 30, and December 31, or any portion thereof. All reports should be submitted electronically, unless otherwise directed by the grants office and program office.

# Report Submission



Document	Due Date	Submission Method
Federal Financial Report (FFR)/ SF-425	Due 30 days after the end of each calendar quarter	Submit via email to the SLIGP email account ( <a href="mailto:sligp@ntia.doc.gov">sligp@ntia.doc.gov</a> ) and Ebony Simmons ( <a href="mailto:ebony.simmons@nist.gov">ebony.simmons@nist.gov</a> )
Performance Progress Report (PPR)	Due 30 days after the end of each calendar quarter	Submit via email to the SLIGP email account ( <a href="mailto:sligp@ntia.doc.gov">sligp@ntia.doc.gov</a> ) and your assigned FPO
Human Subjects Research (HSR) Memo	Prior to conducting any activities determined to be HSR or when the recipient has determined they are not conducting HSR.	Submit via email to the SLIGP email account ( <a href="mailto:sligp@ntia.doc.gov">sligp@ntia.doc.gov</a> ) and your assigned FPO

# Performance Progress Report (PPR) Common Errors



- List Project Deliverable Quantity (#11)
  - List data reflecting actual achievement during the reporting quarter
- Describe the progress you made or challenges you encountered in meeting each major activity/milestone (#11b)
  - Provide a narrative summary on progress and accomplishments, describe challenges faced particularly if the challenges have impeded progress in meeting milestone activity goals. Activities described in this section should also match the achievements numbers listed in section 11.
- List potential baseline and expenditure (B/E) plan changes, additional data and/or best practices (#11 b, c and d)
  - Please indicate if you plan on deviating from your B/E plan goals in the upcoming quarter. Provide any information you think would be useful to NTIA. Provide any best practices.



## PPR Common Errors (continued)

- Staffing Table (#12b)
  - List any staff who worked on SLIGP during the quarter. Please provide their FTE. Also include any staffing changes.
- Budget Worksheet Chart (#14)
  - Please round all totals reflected in the chart to the nearest whole dollar
  - Columns 2,3 and 4 should match your current approved budget
  - Row “i” for columns 5,6,7 should reflect the cumulative % spent through the reporting period. Total funds expended should equal 100%
- Budget Worksheet Chart (Total Costs #14) and SF-425
  - The total federal funds expended (Column 5, Row H) and the total matching funds expended (Column 6, Row H) should match the total federal share and total non-federal share as reported in your SF 425 (10.e and 10.j)

# Federal Financial Report (FFR) SF-425



The FFR must reflect obligations and expenditures, which occurred during the reporting period



## FFR Common Errors

- Federal Grant or Other Identifying Number Assigned by Federal Agency (#2)
- Project/Grant Period (#8)
- Cash on Hand (#10c)
- Total Federal Funds Authorized (#10d)
- Total recipient share of expenditures (#10i)
- Signature of Authorized Certifying Official (#13b)



# MONITOR MATCH PROPORTIONALITY

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# Match Requirements

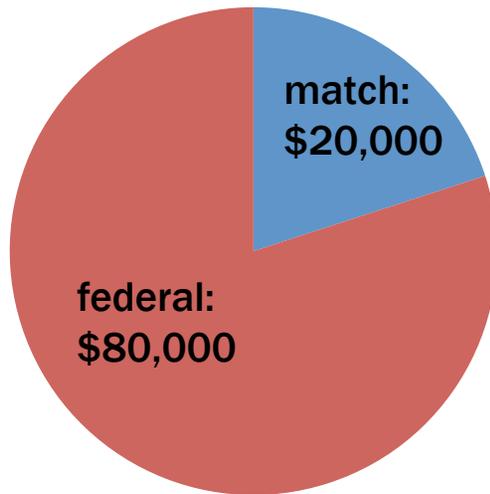
- Pursuant to section A.03 of the DOC Standard Terms and Conditions, the non-federal share, whether in cash or in-kind, is expected to be paid out at the same general rate as the federal share
- If you are unable to meet match proportionality requirements, you must request a proportionality waiver from the grants office



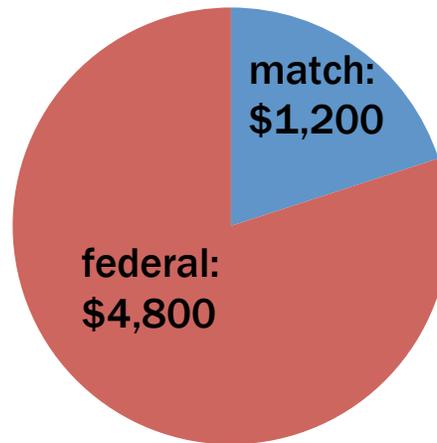
# Match Proportionality Requirements

## Sample

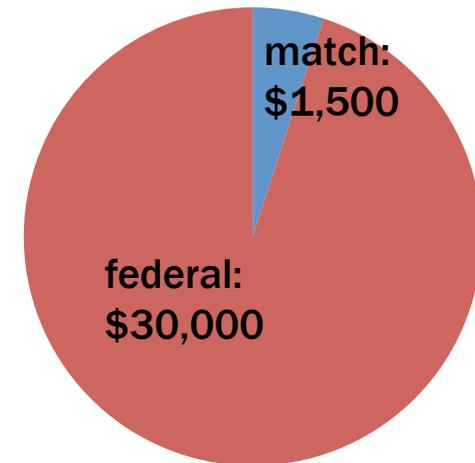
**Total Project Budget**



**Q1 Actual Expenditures:  
In Proportion**



**Q2 Actual Expenditures:  
NOT In Proportion**





# Match Requirements

## Tracking Match Contributions

- Contributions must be allowable, allocable, reasonable and documented
- Costs/contributions must be verifiable from the records of recipients and subrecipients or contractors
- Match contributions should be entered into your accounting system, as practical, and must be reported on the SF-425

# Match Requirements

## Tracking Match Contributions



Document

Document

Document



# Match Requirements

## Tracking Match Contributions

- Records must show how the value assigned to third party in-kind contributions are derived
- Volunteer services should be documented using the same methods that the organization uses to support the allocability of regular personnel costs, to the greatest extent possible
- Recipients should establish a process for valuing and documenting all match contributions that will hold up to scrutiny in an audit

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# SUBRECIPIENT GUIDELINES

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# Subrecipient Requirements

Pursuant to section I.02 of the DOC Standard Terms and Conditions, the recipient shall require all subrecipients, including lower tier subrecipients, under the award to comply with the provisions of the award, including applicable cost principles, administrative, audit requirements and all associated terms and conditions



# Subrecipient Requirements

A revised Special Award Condition has been created to ensure that recipients comply and understand the subaward agreement guidelines.

# Roles of Subrecipients vs. Contractors



Subrecipient	Contractor/Vendor
<p>An entity is a subrecipient when the organization:</p> <ul style="list-style-type: none"> <li>• Has some responsibility for programmatic decision-making</li> <li>• Has responsibility to adherence to applicable federal program compliance requirements</li> <li>• Uses the federal funds to carry out a program of the organization as compared to providing goods or services for a program of the pass-through entity</li> </ul>	<p>An entity is a contractor/vendor when the organization being paid:</p> <ul style="list-style-type: none"> <li>• Provides the goods and services within a normal business operation</li> <li>• Provides similar goods and services within normal business operation</li> <li>• Operates in a competitive environment</li> <li>• Provides goods or services that are ancillary to the operation of the federal program</li> <li>• Is not subject to compliance requirements of the federal program</li> </ul>



# HUMAN SUBJECTS RESEARCH PROTECTION

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# Human Subjects Research Triggers

The term “research” means a **systematic investigation** (e.g., surveys, interviews, observations, research development of testing, and evaluations) **designed to develop or contribute to generalizable knowledge**. To determine whether research contributes to the generalizable knowledge ask:

- Will the information collected be applied beyond a particular program?
- Will you examine whether the program had the desired effect on program participants to inform other programs?
- Do you intend to replicate the program?
- Is the activity designed to draw general conclusions?

The term “human subject” means a living individual about whom an investigator conducting research obtains (1) data through intervention or interaction with the individual or (2) identifiable private information.

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# Human Subjects Research (HSR) Memo



If you believe you **are** conducting human subjects research:

1. Talk to your FPO
2. Submit an exemption request (exemption request 1: conducting a systematic investigation involving human subjects) to [SLIGP@ntia.gov](mailto:SLIGP@ntia.gov) copying your FPO

If you determine you are **not** conducting human subjects research(majority of recipients):

1. Submit a memo stating you are not conducting systematic investigation to [SLIGP@ntia.gov](mailto:SLIGP@ntia.gov) copying your FPO



# AUDIT REQUIREMENTS

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# Audit Requirements for SLIGP



Audit Type	Type of Entity	Audit Trigger	Year(s) Audited	Frequency	Due Date
A-133	State, Local, Tribal, Non-Profit	Expend $\geq$ \$ 500K of federal funds in one year	Fiscal	Annually	30 days after auditor completes or within nine months, after end of fiscal year



# Common Compliance Pitfalls

Category	Specific Issue(s)
1 Documentation	<ul style="list-style-type: none"> <li>• Lack of written procedures (e.g., for volunteer hours)</li> <li>• Difficulty locating requested documents</li> <li>• Difficulty producing accurate reports</li> </ul>
2 Financial	<ul style="list-style-type: none"> <li>• Ineligible costs</li> <li>• Deficient timesheet verification</li> <li>• Match valuation &amp; expenditures not well documented</li> <li>• Financial controls &amp; oversight insufficient</li> </ul>
3 Staffing	<ul style="list-style-type: none"> <li>• Insufficient organizational capacity</li> <li>• Internal communication problems</li> </ul>
4 Communication	<ul style="list-style-type: none"> <li>• Failure to request permission for project changes</li> <li>• Lack of signed agreements with partners</li> <li>• Failure to include flow-down terms in contracts</li> <li>• Insufficient monitoring of subrecipients or vendors</li> </ul>



# AWARD MODIFICATIONS

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## Modification Guidelines

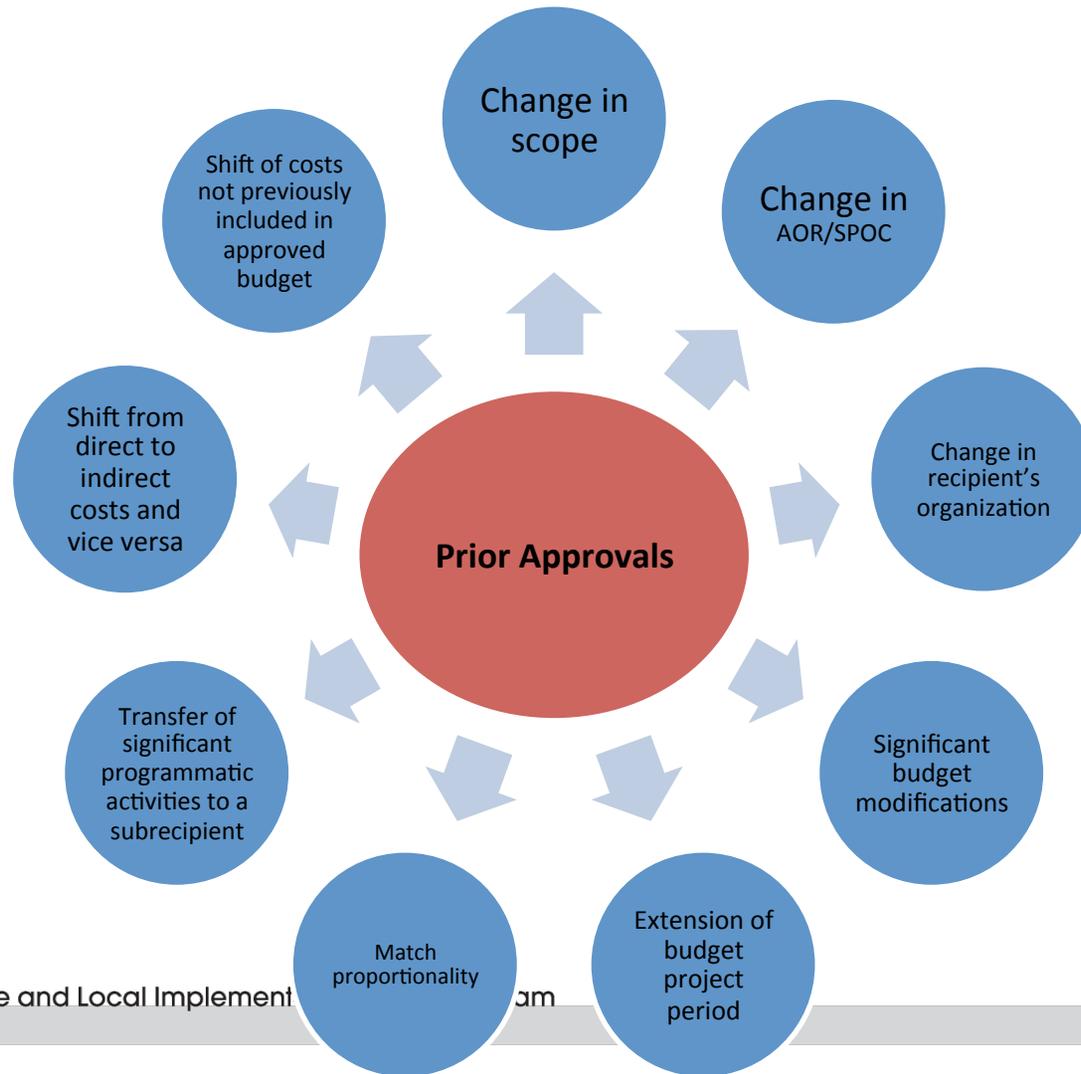
Pursuant to the DOC Standard Terms and Conditions section A.04, requests for budget changes to the approved estimated budget in accordance with the provision noted in the terms and conditions must be submitted to the grants office who shall make the final determination on requests and notify the recipient in writing.



## Modification Guidelines (continued)

- Recipients will likely make changes to their program staffing, activities, and budgets during the grant period
- There is flexibility to make changes as part of the day-to-day implementation and management of their projects
- Some changes to the grant need prior approval by the program office and grants office.

# Prior Approval Overview



# Award Modification Required Documentation



- For key personnel changes submit:
  - SPOC: Letter of designation signed by the Governor for the new SPOC.
  - AOR: Letter indicated change including full name, title and contact information for new AOR.
- For budget modifications submit:
  - Budget modification request
  - Revised SF-424A
  - Revised detailed budget
  - Revised budget justification
- For programmatic activity modifications:
  - Discuss with your FPO



# SITE VISITS

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## Site Visits

**Who:** Any SLIGP recipient may receive a site visit. Typically, the federal program officer (FPO) will attend. Grants office staff or other personnel may also attend

**What:** Site visits provide an opportunity for FPOs to programmatically engage in-person with recipients for at least a day

**Where:** Site visits generally occur at the recipient's headquarters and/or the location(s) of project implementation

**When:** NTIA notifies recipients well in advance of a site visit, and coordinates to ensure that recipient staff are available

**Why:** Site visits help federal staff get a more complete picture of a project's status and challenges through in-person meetings and document review sessions, and is an opportunity to observe programmatic activities

# SLIGP Points of Contact



Inquiry	Point of Contact
General feedback, comments and concerns	Mike Dame, Program Director (202) 482-1181, <a href="mailto:mdame@ntia.doc.gov">mdame@ntia.doc.gov</a>
Assistance with required program documents and/or day-to-day program activities for specified states	Claudia Wayne, Federal Program Officer (202) 482-2714, <a href="mailto:cwayne@ntia.doc.gov">cwayne@ntia.doc.gov</a>
	Carolyn Dunn, Federal Program Officer (202) 482-4103, <a href="mailto:cdunn@ntia.doc.gov">cdunn@ntia.doc.gov</a>
	Yuki Miyamoto, Federal Program Officer (202) 482-5571, <a href="mailto:ymiyamoto@ntia.gov">ymiyamoto@ntia.gov</a>
General Grants Management feedback, comments and concerns	Calvin Mitchell, Grants Officer (301) 975-4585, <a href="mailto:calvin.mitchell@nist.gov">calvin.mitchell@nist.gov</a>
Assistance with required grants management documents and /or day-to-day grant activities	Husai Rahman, Non-Supervisory Grants Officer (301) 975-4355, <a href="mailto:husai.rahman@nist.gov">husai.rahman@nist.gov</a>
	Ebony Simmons, Grants Management Specialist (301) 975-4166, <a href="mailto:ebony.simmons@nist.gov">ebony.simmons@nist.gov</a>