



WASHOE COUNTY

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CM/ACM_____

Finance_____

DA_____

Risk Mgt._____

HR_____

Other_____

STAFF REPORT

BOARD MEETING DATE: January 26, 2016

DATE: January 6, 2016
TO: Board of County Commissioners
FROM: Gabrielle Enfield, County Grants Administrator
genfield@washoecounty.us, 775-328-2009
THROUGH: Al Rogers, Management Services Director
SUBJECT: **Recommendation to Approve the Updated Washoe County Grant Management Policy Manual 2016. (All Commission Districts)**

SUMMARY

The Washoe County Grant Management Policy Manual provides standardized policies and procedures to assist staff in complying with contractual, regulatory, and statutory provisions of grant awards. Since the last grant manual update in 2013, the Office of Management and Budget has issued the *Uniform Administrative Requirements, Cost Principles and Audit Requirements*. This policy document represents the most comprehensive change in federal grants administration since 1959 when the federal government began issuing government-wide directives on grants administration. The updated manual incorporates the changes in the *Uniform Guidelines*, provides more in-depth information, and includes a number of administrative tools for ensuring compliance.

County Priority/Goal supported by this item:

- **Safe, secure and healthy communities**

PREVIOUS ACTION

On July 9, 2013 the Board of County Commissioners approved the updated Washoe County Grant Management Policy Manual 2013.

BACKGROUND

Grant funds received by Washoe County support important programs and services that the county provides to the community. These funds allow the county to extend existing services, introduce new initiatives, gain technological advances, and support programmatic staffing. Grant funds are utilized throughout the county and impact: public safety, social services, public health, recreation, and infrastructure improvements.

The financial integrity of Washoe County is of utmost importance, and maintaining comprehensive grant administration policies is a key element to maintain this integrity. The grants management manual provides standardized policies and procedures to assist staff in complying with contractual, regulatory, and statutory provisions of grant awards.

Since the last grant manual update in 2013, the Office of Management and Budget has issued the *Uniform Administrative Requirements, Cost Principles and Audit Requirements*. This policy document represents the most comprehensive change in federal grants administration since 1959 when the federal government began issuing government wide directives on grants administration. The updated manual incorporates the changes in the *Uniform Guidelines*, provides more in-depth information, and includes a number of administrative tools for ensuring compliance.

FISCAL IMPACT

No Fiscal Impact

RECOMMENDATION

Recommendation to approve the updated Washoe County Grant Management Policy Manual 2016.

POSSIBLE MOTION

Should the Board accept staff's recommendation a possible motion would be: "*Move to approve the updated Washoe County Grant Management Policy Manual 2016.*"



**WASHOE COUNTY
GRANT MANAGEMENT
POLICY MANUAL
2016**

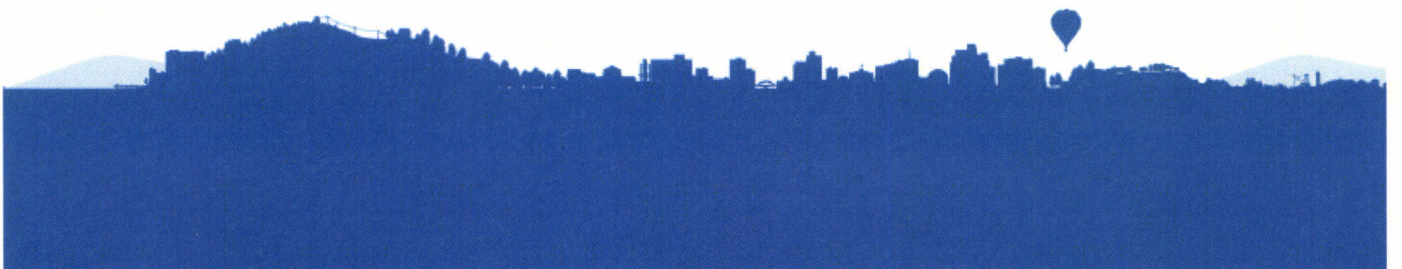


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I. INTRODUCTION

Grant funds received by Washoe County support important programs and services that the County provides to the community. These funds allow the County to extend existing services, introduce new initiatives, improve infrastructure, gain technological advances, and support programmatic staffing. Grant funds are utilized throughout the County and impact a variety of efforts including public safety, homeland security, social services, public health, recreation, infrastructure improvements, and others. Because grant funding allows the County to leverage local public funds in order to extend and enhance the services offered to the community, the impact of grant funding upon the community is significant, with the process of grants administration and management a critical and important function. The financial integrity of Washoe County is of utmost importance and adopting comprehensive grant administration policies is a key element to maintain this integrity.

These policies and procedures are intended to foster exceptional stewardship of the public trust through a rigorous adherence to ethical and professional standards associated with grant related activity. Adherence to these policies and procedures will promote efficiency, better transparency, greater accountability, a strategic approach to funding opportunities, and generally place the County in a more competitive position for securing grant funds. The manual is designed to provide general guidance and direction for the staff of Washoe County responsible for the administration and management of grant funding. It is not intended that all details of grants management be covered, rather that the user is informed of the general policies and procedures of grants management.

The goal of this manual is to provide standardized policies and procedures and assist staff in complying with contractual, regulatory, and statutory provisions of the grants. To this end the County Grants Administrator is available to provide information and assistance. It is recognized that there may be exceptions to any rule. As those exceptions arise, this manual can be revised, amended or overruled as appropriate, when approved by the Board of County Commissioners, or the County Manager. Adherence with the provisions contained herein is mandatory and incumbent upon all County employees.

The majority of grant funds received by Washoe County departments, divisions, offices and districts are Federal funds. These funds are received either directly from the Federal agency, or as a pass-through grant from a state agency, or in some cases as pass-through from another local government. Federal funds received directly from the Federal agency, or as a pass-through grant from a State of Nevada agency, or from another local government all require strict adherence to the guidelines and regulations imposed on Federal grant funds. A good portion of this manual focuses on the requirements for Federal assistance, as those requirements are generally stricter than the requirements imposed on State of Nevada funds, or funds received from other local governments or from foundations or corporations.

II. GRANT ROLES AND RESPONSIBILITIES

A. Office of the County Manger

The Manager's Office through the County Grants Administrator is responsible for the general management and administration of the County grant activities to include chairing the Grant Committee; facilitation of departmental grant planning and collaborative grant submittals; grant training and technical assistance to County staff; ensuring that departments track and report departmental grant activity; development and maintenance of grant policies and procedures; promoting grant opportunities; and identifying and investigating issues that may arise with respect to the management of County grants.

The County Grants Administrator may provide grant proposal development services to a collaborative grant writing team when the grant is focused on the mission, goals and/or client population of one or more county departments. Services may include: supporting the development of the grant team, coordinating of the proposal development, grant writing, demographics and statistics, editing, and electronic submission.

The Grants Division also maintains the County's participation and authorizes departmental users for the various electronic grant management and draw request systems. The County Grants Administrator acts as the Point of Contact for each of these systems including, but not limited to: System for Award Management (SAM), Grants.gov, federalreporting.gov, and eRA Commons (Electronic Research Administration).

Budget Division Analysts review Request to Submit forms submitted for their assigned departments and provide recommendation regarding approval to the Assistance County Manager for Finance and Administration.

B. District Attorney's Office

The District Attorney's Office through the Civil Division provides legal representation to all elected and appointed officials of Washoe County, as well as to over 68 boards, agencies, and commissions through which services are provided to the public. All contracts, agreements, memorandums of understanding, subawards, and resolutions are reviewed by the District Attorney's Office prior execution or approval by the authorizing Board. The District Attorney's Office also determines whether there is appropriate authority to carry out the grant program activities.

C. Comptroller's Office

The Comptroller's Office provides general fiscal oversight of grant-related activity. Responsibilities include management of the annual Single Audit, creation (at the request of department grant coordinators) of internal orders to facilitate accounting for grant revenues and expenditures, and maintaining the County's capital assets system in accordance with capitalization policies established by the Board of County Commissioners.

The Comptroller's Office also works closely with the Budget Division and County Grants Administrator to establish and maintain policies and procedures that support effective financial control over grant funds.

D. Purchasing Division

The Purchasing Division processes purchase orders in accordance with state laws and County code. It is the responsibility of the grant receiving department to make the Purchasing Division aware of any Federal requirements or stipulations regarding the expenditure of grant funds prior to or at the time of submission of the purchase requisition. Purchasing is also responsible for maintaining the County's physical inventory system for capital assets that include all tangible equipment and personal property that has an estimated useful life of more than one year and an actual or replacement cost of \$5,000 or more. This inventory may also include lower value assets deemed to have a high risk of loss.

E. Community Services Department

On grant funded projects, the Community Services Department is responsible for ensuring that departments meet the Federal, State and local requirements for construction projects. These requirements include, but are not limited to: Environmental Review statutes and regulations; Davis Bacon and Related Acts, and Contract Work Hours and Safety Standards Act.

F. Technology Services Department

Technology Services provides customer service, support and maintenance services to assist departments in the success of their business applications. On grant funded projects that purchase and/or implement technology items, Technology Services should be advised early on of computer, network, software, radio, phone, GIS and paging purchases. It is the responsibility of the grant receiving department to make Technology Services aware of grant awards involving the purchase of technology and/or requiring support from Technology Services staff, prior to or, at the time of award.

G. County Grants Committee

The County Grants Committee is a committee comprised of liaisons from each department, designated divisions and offices to facilitate information sharing and policy and procedure support. The County Grants Committee is the mechanism for communication between the County Grant Administrator and the County Departments and support for grants management and administration.

H. Grants Committee Liaison

The Liaison is a key component in successfully achieving the County's grants management goals. To facilitate communication, each Department Head shall select an individual to represent the department on the County Grants Committee and to be the department's point of contact with the County Grants Administrator. The Department Head may designate more than one Liaison if department activity requires more than one Liaison. The Liaison shall:

1. Communicate grant related information from the County Grants Administrator, attend Grants Committee meetings, and relay communications to all staff in their department with grant responsibilities.
2. Serve as the conduit for grant related ideas and information from the department back to the County Grant Administrator and Grants Committee.
3. Monitor departmental grant activity and facilitate compliance with Federal grant requirements and County grant policies and procedures.
4. Report his/her department's grant activity to the County Grants Administrator and/or enter his/her department's grant activity in the grants management tracking system.
5. Participate in Grants Committee meetings and subcommittee meetings to accomplish committee goals and objectives, as needed.
6. Share ideas and expertise in grant meetings and training events, as requested.

I. County Departments, Divisions, and Offices

County Departments, Divisions, and Offices that apply for and utilize grant funds are responsible for all aspects of the grant process including preparation and submission of grant proposals, grant writing, conducting comprehensive award reviews, obtaining prior approvals, preparing and authorizing Board agenda items to accept grant awards, developing grant implementation plans, managing grant programs and projects, planning for grant acquisitions, ensuring compliant grant expenditures, including alerting the Purchasing Division of grant related expenditure requirements, subrecipient management, preparing and submitting reports to sponsors, and properly closing out grant projects, as detailed in this policy, and the grant agreement or contract that delineates the terms and conditions of the grant.

Direct grant management involves program design, proposal development, project management, fiscal administration, and compliance adherence. The primary responsibilities described below may be carried out by one staff member throughout the life cycle of the grant, but often are carried out by multiple staff for an individual grant project. Staff responsible for each of these components must ensure that the grant is compliant with applicable guidelines and regulations.

Grant Proposal Development – Developing the grant proposal and coordinating a grant submission.

Grant Coordination– Reviewing the award documents, setting up the grant files, ensuring compliance with grant requirements including but not limited to: procurement, eligibility, subrecipient management, contract management, labor requirements, and environmental review.

Grant Project Management –Managing the implementation and evaluation of the program or project funded by the grant assuring the goals and objectives are met, and developing programmatic reporting.

Grant Fiscal Management - Ensuring compliance with fiscal requirements of the grant including but not limited to: cost principles, audit and fiscal reporting.

III. AUTHORITY

A. OMB Uniform Guidance

2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Office of Management and Budget, December 26, 2013. Title 2, Subpart A, Chapter II, Part 200.

The final guidance supersedes and streamlines the grants management requirements from OMB Circulars A-21, A-87, A-110, and A-122; Circulars A-89, A-102, and A-133; and the guidance Circular A-50 on Single Audit Act follow up.

The OMB guidelines are the common guidelines for all Federal grants management. All County staff involved in grant management and reporting must be familiar and compliant with 2 CFR Part 200, Uniform Guidance.

B. Agency Specific Implementation

Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards – Interim Final Rule December 19, 2014.

This joint interim final rule implements for all Federal award-making agencies the final guidance Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) published by the Office of Management and Budget (OMB) on December 26, 2013. This rule is necessary in order to incorporate into regulation and thus bring into effect the Uniform Guidance as required by OMB. Each federal agency has or will be releasing revised regulations to implement the Uniform Guidance. For links to federal agency-specific regulations, go to: <https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>

B. Single Audit

The A-133 Circular was issued pursuant to the Single Audit Act of 1984, P.L. 98-502, and the Single Audit Act Amendments of 1996, P.L. 104-156. It set forth standards for obtaining consistency and uniformity among Federal agencies for the audit of states, local governments, and non-profit organizations expending Federal awards. The Uniform Guidance noted above supersedes the A-133 Circular, see Subpart F Audit Requirements.

OMB Circular A-133 incorporated the requirements of the Single Audit Act. The Single Audit Act was enacted to ensure the accurate accounting of grant funds and compliance with program standards. Material non-compliance findings in the Single Audit report, including failure to accurately report federal expenditures on the Schedule of Expenditure of Federal Awards (SEFA), could result in loss of applicable grant funding. Grantors are required to monitor their subrecipient's Single Audit findings to help ensure that findings are corrected. Therefore, it is mutually beneficial for both the Comptroller's Office and the county departments to ensure that grant activity is accurately reported on both the grantor financial reports filed by the

departments, and the SEFA prepared by the Comptroller's Office for the County's Single Audit report.

(1) Single Audit Process at Washoe County

The Single Audit Act requires governmental entities that expend over \$750,000 of Federal funds in a year to prepare a Schedule of Expenditures of Federal Award (SEFA), which is audited annually. At Washoe County the SEFA is compiled by the Comptroller's Office, and an external accounting firm is contracted to conduct the Single Audit. The Single Audit is conducted at the same time as the year-end audit. However, the Single Audit testing scope is determined by the size and type of the grant programs expenditures for the year as directed by the federal guidelines. Copies of the County's most recent Single Audit report are available upon request and available via the Washoe County web site.

To meet the sampling and scope requirements, Comptroller's staff prepares several estimates prior to year-end final numbers. The details of the Single Audit requirements are included with the year-end calendar and procedures issued by the Comptroller's Office before the end of May. An overview of the Washoe County Single Audit process follows:

- May – a preliminary expenditure trend is prepared for the auditors by CFDA program. This estimate, in combination with our past program history, is used to establish the initial scope. Comptroller's Office staff may contact grantees with larger unspent budget at this point, to help improve the estimates.
- May – department responses on corrective actions taken on prior year audit findings is due to the Comptroller's Office.
- June - the auditors will contact departments to schedule audits for known high-risk, Type-A programs with the audit work starting in July. Type-A programs are those grants by cluster (by CFDA #) that have year to date expenditures more than \$900,000. This target dollar changes as the County's total spending changes.
- July – a preliminary SEFA is prepared by the Comptroller's Office during the first week of July. The Comptroller's Office will also list the major items for year-end yet to be completed, so the auditors can adjust the preliminary estimates accordingly. Based on this preliminary report, the number of programs to be tested could change requiring additional departments to be contacted for on-site audits.
- July – Auditors will begin on-site audit work at the Comptroller's Office and at the departments to review the selected programs. During field work all grant documentations at the departments are expected to be complete and available for audit.
- July – Departments submit Federal commodities and/or equipment receipts lists to the Comptroller's Office.
- August – By August 1st, the grant confirmations should be completed by the departments and a draft SEFA is prepared for the auditors that is reconciled to the SAP general ledger. The auditors review and comment on this draft with Comptroller's Office staff providing backup research and documentation as required.

- August – Auditors continue field work and may have begun to report findings to departments.
- October-November – The auditor field work is completed with findings reported to the departments and to Comptroller’s Office staff. Department responses to these findings are required by the end of the month. The SEFA is finalized. In addition, the auditors will perform other required inquiries, including questions about other audits, fraud, commitments and contingencies, and subsequent events that may affect the federal programs. The auditors will send management representation letters to key major program personnel and the Comptroller’s Office approximately one week before the anticipated issue date. The responses should be sent to the auditors in a timely manner. The auditors will not issue the audit report until all of the signed representation letters are received.
- October-November – After the auditor’s internal quality control reviews, reports are finalized for inclusion in the County’s Comprehensive Annual Financial Report (CAFR) and for submission to the Federal Audit Clearinghouse.

IV. NATIONAL POLICIES AFFECTING GRANTS

In addition to the federal requirements specifically related to the management of Federal grants there are numerous cross-cutting Executive Orders, regulations, and Acts of Congress that grantees must comply with when receiving federal financial assistance. National Policies fall into a number of specific issue categories including: Civil Rights, Labor Standards, Crimes and Prohibited Activities, Lobbying Restrictions, and Environmental Review, among others. Below are a number of significant national policies that impact the implementation of grant projects. Grantees should closely review their grant awards for requirements related to national policies and other agency specific laws and policies.

In some cases the County, as a grantee, is required to have adopted specific assurances, certifications, and policies related to compliance issues in these national policies (e.g. Equal Employment Opportunity Plan, Certification Prohibiting Excessive Use of Force, etc.). The County Grants Administrator maintains records of such policies adopted by the Board of County Commissioners, and can assist with policy updates and/or development of new policies required for compliance with grant requirements.

A. Civil Rights

Title VI of the Civil Rights Act of 1964, P. L. 88-352. Prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Title VIII of the Civil Rights Act of 1968, P.L. 90-284 (Fair Housing Act). Prohibits discrimination in the sale, rental and financing of dwellings based on race, color, religion, national origin, disability or familial status, as well as establishing administrative enforcement mechanisms, revised and expanded Justice Department jurisdiction, and contains design and

construction accessibility provisions for certain new multifamily dwellings developed for first occupancy.

Title VIII amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions. The Amendment:

- expended coverage of the Fair Housing Act to prohibit discrimination based on disability or on familial status (presence of child under age of 18, and pregnant women);
- established new administrative enforcement mechanisms with HUD attorneys bringing actions before administrative law judges on behalf of victims of housing discrimination; and
- revised and expanded Justice Department jurisdiction to bring suit on behalf of victims in Federal district courts.

The Age Discrimination Act of 1975 prohibits discrimination on the basis of age in programs or activities receiving Federal financial assistance, directly or through contractual, licensing, or other arrangements use age distinctions or take any other actions which have the effect, on the basis of age be excluded from participation in, denied benefits of, or be subjected to discrimination under, a program or activity receiving Federal financial assistance.

Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency requires that greater emphasis be put on existing requirements under Title VI of the Civil Rights Act to protect persons who, as a result of national origin, are limited in their English proficiency (LEP).

Section 504 of the Rehabilitation Act of 1973: Section 504 provides that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

B. Labor Standards

The Fair Labor Standards Act: The FLSA established minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the private sector and in Federal, State, and local governments.

The Davis Bacon and Related Acts (DBRA) require all contractors and subcontractors performing work on federally assisted contracts in excess of \$2,000 to pay their laborers and mechanics not less than the prevailing wage rates.

The Contract Work Hours and Safety Standards Act (CWHSSA) applies to Federal service contracts and Federal and federally assisted construction contracts over \$100,000. It requires contractors and subcontractors on covered contracts to pay laborers and mechanics employed in the performance of the contracts one and one-half times their basic rate of pay for all hours worked over 40 in a workweek. This Act also prohibits unsanitary, hazardous, or dangerous working conditions on Federal and federally financed and assisted construction projects.

Drug-Free Workplace Act of 1988: Grantee shall certify to the agency that it will provide a drug-free workplace.

C. Crimes and Prohibited Activities

The Copeland "Anti-Kickback" Act, 40 USC §276c and 18 USC §874: The "Anti-Kickback" section of the Act precludes a contractor or subcontractor from inducing an employee to give up any part of the compensation to which he or she is entitled under his or her contract of employment. The Act also requires the contractor and subcontractor to submit a weekly statement of the wages paid to each employee performing on covered work during the preceding payroll period.

The False Claims Act 31 U.S.C. §3729–3733 imposes liability on persons and companies (typically Federal contractors) who defraud governmental programs. The law includes a "qui tam" provision that allows people who are not affiliated with the government to file actions on behalf of the government (informally called "whistleblowing"). Persons filing under the Act stand to receive a portion (usually about 15–25 percent) of any recovered damages.

Federal Executive Order 12549 "Debarment and Suspension" requires that all contractors receiving individual awards, using Federal funds of \$25,000 or more, and all subrecipients certify that the organization and its principles are not debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency from doing business with the Federal government.

D. Accountability and Transparency

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The FFATA legislation requires information on Federal awards (Federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is www.USASpending.gov.

The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e. prime contractors and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. Prime contract awardees will report against sub-contracts awarded and prime grant awardees will report against subgrants awarded. The subaward information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award furthering Federal spending transparency.

E. Lobbying Restriction

Section 319 of Public Law 101-121 (certification required for contracts and subcontracts of \$100,000 or more) prohibits use of Federal funds for lobbying the Executive or Legislative Branches of Government in connection with a specific contract, grant or loan, etc. which prohibits grantee/subrecipient from using appropriated Federal funds for lobbying the Executive or Legislative Branches of the Federal Government in connection with a specific contract, grant, or loan, and requires that no Federal appropriated funds have been paid or will be paid, by or on

behalf of grantee/subrecipient, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement

F. Environmental Review

The National Environmental Policy Act (NEPA) [42 U.S.C. 4321 et seq.] established national environmental policy and goals for the protection, maintenance, and enhancement of the environment and provided a process for implementing these goals within the Federal agencies. NEPA applies to all proposals for Federal action that have the potential to affect the quality of the human environment. Environmental Review under NEPA requires the examination of ALL Federal laws and authorities that address the environment with respect to a Federal activity.

V. PRE-AWARD ACTIVITIES

The purpose of this policy is to ensure that each grant application submitted by the County is aligned with an established County priority, has matching funds available, if required by the sponsor, and that the means for continuation of the project or program after the grant period, has been given thorough consideration. The department submitting the grant application is responsible for ensuring the pre-application assessment factors noted below have been evaluated and completed prior to submission.

A. Pre-Application Assessment

A pre-application assessment begins with the review of the Notice of Funding Availability, and evaluates the following factors:

Eligibility & Competition

- Is the County an eligible applicant?
- Is a partnering non-profit entity an eligible applicant?
- Is a coalition or partnership necessary for a competitive proposal?
- How many total awards will be made nationally?

Programmatic Factors

- Alignment with department mission and County strategic priorities
- Community and service delivery benefits
- Provision or expansion of services to address critical needs
- Department's capacity to implement the program and achieve successful outcomes

Financial & Resource Factors

- Total anticipated project cost (including: reimbursable and non-reimbursable costs and costs associated with subgranting).

- Match requirements and sources
- Program income considerations
- Staffing requirements (including salary and benefits) increase for multi-year grants
- Department's capacity to administer the requirements of the grant
- Plan for sustaining/terminating the program in the event of loss of grant funding and/or end of the grant term.

The pre-application assessment should be done in consultation with the department's Fiscal Manager or equivalent, Budget Analyst, and the Department Head.

Program planning and development consists of all activities required to assess needs and identify strengths, weaknesses, opportunities, and threats (SWOT Analysis) through collaboration with program partners, proposed participants, and stakeholders. Partners, participants, and stakeholders then formulate a strategy, preferably using best practices, to address the identified need. This encompasses setting objectives or targets for program accomplishment, selecting the program content, methods of service or product delivery, establishing baseline data through assessment in order to evaluate program success, and identifying the roles of each partner, participant, and stakeholder.

B. Participation in Community Collaborative Grants

External organizations frequently seek support from Washoe County for grant applications they intend to submit to a sponsor. Washoe County has a long standing commitment to partnering with other jurisdictions, agencies, and community based organizations. Requests for such support are often made to department staff or directors.

The purpose of the Letter of Support process is to avoid supporting grant applications that are competing with County Departments for the same grant opportunity. This process also prompts consideration, communication, and analysis prior to supporting a grant proposal, as there may be other reasons why it would not be in the County's interest to provide a letter of support.

(1) Request for Letters of Support

Letters of support for a grant application prepared by an external entity shall be coordinated by the Department Head in consultation with the County Grants Administrator and the District Attorney's Office before submission to the requesting organization.

1. Upon receiving a request for a letter of support from an external organization for a grant application it intends to submit, the department must decide whether to support the request.
2. The Department Head is responsible for documenting the information and reasoning behind the decision and for ensuring that no potential liabilities to the County will be incurred as a result of their action.
3. If the Department Head decides he/she supports the request and intends to provide a letter of support, he/she must provide the County Grants Administrator with the

name, mission, and activities of the requesting organization, and whether or not there will be future obligations by the County.

4. The County Grants Administrator will determine whether a department of the County is in competition, or likely to be in competition for the same grant opportunity by reviewing the Request to Submit forms received from County departments.
5. If a department of the County is likely to be in competition for the same grant opportunity, the competing department will be notified. If the Department Head supplies a letter of support, a copy of the letter should also be sent to the County Grants Administrator.

If the requesting organization is seeking a commitment of County resources (staff participation, space, matching funds, etc.) the request is for a collaborative relationship rather than just a letter of support. Collaborative partnerships may or may not involve the County as a recipient of a grant award.

(2) Collaborative Grant Applications

Many grants require partnering with other organizations to develop projects that demonstrate commitment and participation from a broad base of organizations. Collaborations may encompass a broad spectrum of organizations across a defined region, interdisciplinary agencies working toward a continuum of services, and/or a combination of governmental and community-based organizations. Through collaborative partnerships the impact of the program can be intensified and the sponsor benefits from the value of leveraging the resources of numerous partner organizations.

Washoe County has historically participated in and provided leadership for collaborative grant programs. As with all grant opportunities, careful consideration is required to assess the value and benefit of the County's participation in these projects. When a County Department is considering participation in a collaborative grant application the Pre-Application Assessment and the Letter of Support process should be conducted, whether the County is to receive funding from the grant or not. Additionally if the County is to receive grant funds as a grantee or subgrantee, then a Request to Submit form needs to be completed.

The County Grants Administrator can provide grant proposal development services to a collaborative grant writing team when the grant is focused on the mission, goals and/or client population of one or more county departments. Services may include: supporting the development of the grant team, coordinating of the proposal development, grant writing, demographics and statistics, editing, and electronic submission.

C. Internally Competing Applications

Sponsors generally will not consider any proposal from a jurisdiction, if that jurisdiction has submitted more than one proposal during the same funding round. Even if the sponsor allows competing applications, it may not be in the best interest of the County to compete against itself.

The purpose of this policy is to identify the procedures for resolving such conflicts.

- Upon identifying the potential for the submission of multiple grant applications to the same sponsor during the same funding cycle, the Grant Coordinator shall confirm with the sponsor's program manager in writing to determine, if the sponsor permits multiple submissions and inform their department or division's CGC Liaison and the County Grants Administrator.
- The County Grants Administrator shall work with competing departments to identify a mutually agreed upon solution, such as determining whether one department is better suited to pursue the grant, if more than one department should work together to pursue the grant or if more than one application may be submitted.
- If the departments cannot agree upon a solution, the County Grants Administrator will present the competing recommendations to the County Manager who will recommend a resolution. The ultimate decision on whether or not to submit competing grant applications will stand with the County Manager or elected Department Head as applicable.

D. Application Submission - Request to Submit

All County grant applications must be approved by the Assistant County Manager for Finance or the appropriate governing/managing board (Board of County Commission or District Board of Health) **prior to application**. Board approval for applications is only necessary when required by the granting agency. For all other grant applications the Assistant County Manager for Finance's approval is appropriate.

1. The Request to Submit form should be submitted using the online form, at least ten (10) working days prior to the date on which the proposal must be submitted. Forms submitted after the due date will not be reviewed.
2. The Management and Budget Division will process your request within ten (10) working days. If the request is denied, the grant contact will be notified.
3. The grant contact should check the Request to Submit site to ensure that the request has been approved prior to submitting the grant proposal.
4. Request to Submit forms are required for all new grant applications, amendments or supplements.

On-going grants (new awards for continuing projects) are NOT exempt from the Request to Submit procedure.

E. Single Point of Contact (SPOC)

To foster intergovernmental partnerships and strengthen federalism by relying on state and local processes for the coordination and review of proposed federal financial assistance and development, Federal Executive Order (EO) 12372, "Intergovernmental Review of Federal Programs," was issued. The Office of Grant Procurement, Coordination and Management, (also referred to as the State Grant Office), is the designated single point of contact (SPOC) for

Nevada State agencies submitting federal grants and for all statewide grant-related SPOC inquiries.

The SPOC works to eliminate duplicate efforts by public entities for competitive grants where there may be cross-agency supports or that may only allow one entity to submit. The State can also work with public entities in situations where they may be more competitive to provide a state bona-fide representative letter. Letters of support or designations for federal grants from the Governor's Office, and designations of bona-fide state agencies are also handled through the State Grant Office. <http://grant.nv.gov/Contact/>

F. Federal Grant eSystems

(1) System for Award Management(SAM)

The System for Award Management (SAM) is the official U.S. government system that consolidated the capabilities of Central Contractor Registry (CCR), Federal Agency Registration (FedReg) Online Representation and Certifications Application (ORCA), and Excluded Parties List System (EPLS). Washoe County is registered on SAM under the County DUNS number, and the County Grants Division maintains the registration.

(2) Grants.gov

Grants.gov was established as an E-Government initiative in 2002. The system provides a centralized location for grant seekers to find and apply for federal funding opportunities. The Grants.gov system houses information on over 1,000 grant programs and vets grant applications for 26 federal grant-making agencies.

The County Grants Division is registered with Grants.gov under the County DUNS number. All staff responsible for submitting grants through grants.gov must set-up an Authorized Organizational Representative (AOR) account. Setting up an AOR account is a simple process.

1. Register under Organizational Applicant.
2. Enter Washoe County's DUNS number.
3. Click the Register button.
4. Complete the Applicant Registration page, which includes creating a username and password.
5. Submit your Applicant Registration.
6. An email is automatically sent to the E-Biz POC upon submission.
7. The County E-Biz POC will review your request and authorize account set-up for grant related County employees. The E-Biz POC may contact the requesting Department's designated Grants Representative prior to authorization.

(3) USAspending & FFATA Subaward Reporting System (FSRS)

USAspending.gov is the publicly accessible, searchable website mandated by the Federal Funding Accountability and Transparency Act (FFATA) of 2006 to give the American public access to information on how their tax dollars are spent. The FFATA legislation required that federal contract, grant, loan, and other financial assistance awards of more than \$25,000 be displayed on a searchable, publicly accessible website. As a matter of discretion, USAspending.gov also displays certain federal contracts of more than \$3,000. Federal agencies are required to report the name of the entity receiving the award, the amount of the award, the recipient's location, the place of performance location, as well as other information. In 2008, FFATA was amended by the Government Funding Transparency Act to require prime recipients to report details on their first-tier sub-recipients for awards made as of October 1, 2010.

The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e. prime contractors and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. Prime contract awardees will report against sub-contracts awarded and prime grant awardees will report against subgrants awarded. The subaward information entered in FSRS will then be displayed on www.USAspending.gov associated with the prime award.

If a County department is a Federal prime awardee and subawards funds, the department is responsible for reporting first-tier subawards in the FSRS.

(4) Federal Awardee Performance Integrity Information System (FAPIS):

FAPIS is a system designed to ensure Federal awards are issued to reliable and qualified recipients by providing award officials with information pertaining to the past performance of applicants. FAPIS is used to collect contractor and grantee performance information including Terminations for Cause or Default, Defective Cost and Pricing Data, Determinations of Non-Responsibility, Terminations for Material Failure to Comply (grants), Recipient Not Qualified Determinations (grants), DoD Determination of Contractor Fault and Administrative Agreements. Once records are completed in FAPIS, they become available in the Federal Past Performance Information Retrieval System (PPIRS) where they are used to support future acquisitions.

On July 22, 2015, the Office of Management and Budget (OMB) released the final rule to implement the Federal Awardee Performance Integrity Information System (FAPIS) for Federal grant awards. The final rule is implemented by amending 2 CFR 200 and 2 CFR 180.

Beginning on January 1, 2016, Federal awarding officials are required to review FAPIS as part of a pre-award risk assessment before making a grant award greater than \$150,000. During the FAPIS review, agency officials will determine if an applicant is "qualified" or "not qualified" to receive an award. Federal awarding agencies will be required to notify grant applicants if they have been deemed "not qualified" for an award.

Grant applicants should review the information in FAPIIS about their entity before submitting an application. Grant applicants have the opportunity to submit a response about any information about their entity contained in FAPIIS.

As a result of the final rule, 2 CFR 200 has been amended in multiple places, including:

- 2 CFR 200.205 has been revised to require Federal agencies to review FAPIIS as part of the pre-award risk assessment before making an award in excess of the simplified acquisition threshold.
- 2 CFR 200.212 now details the reporting requirements for agencies when a grant applicant has been determined to be “not qualified” for a Federal award.
- 2 CFR 200.213 contains information regarding suspension and debarment which was previously found at 2 CFR 200.212.
- 2 CFR 200.339 and 2 CFR 200.340 provide information regarding an agency’s responsibility to the termination of an award to FAPIIS.
- Appendix XII has been added to 2 CFR 200 to explain the award term and condition for recipient reporting on integrity and performance matters.

The new requirements are not applicable to pass-through entities. However, since FAPIIS is publically available, pass-through entities may want to review the system before making a subaward.

VI. POST-AWARD ACTIVITIES

A. Award Review

Upon notice of a grant award the department is responsible for conducting a comprehensive review of the award documents. Department staff both programmatic and fiscal are required to read the grant award documentation. The award review should consider the budget conditions; matching costs; and the terms and conditions of the grant agreement. If there are questions about wording in the award documents, the department should contact the funding entity that issued the award to ensure a clear understanding of expectations and requirements.

In the event that funds awarded by the sponsoring agency are reduced from those requested in the original application, or factors previously evaluated at the time of application have changed, the department must ensure that the goals, objectives, and evaluative components of the grant can still be accomplished within the prescribed timeframe set by the sponsor.

If the award terms need to be amended before the grant award can be accepted, the department will negotiate with the sponsor and obtain changes to the grant award in writing. If award terms cannot be negotiated to the department’s satisfaction, the Department Head of the recipient department will prepare a letter to the sponsoring agency declining the award, and provide a copy of the letter to the County Grants Administrator. The letter should express the County’s regret in declining the award and clearly articulate the specific reason(s) the award is being declined.

Consideration should be paid to the cost of accepting, expending and administering a small grant award. Grant awards of less than \$500 are discouraged due to the costs incurred to complete award review and approval, expend the grant funds and comply with grant reporting requirements.

(1) Instrument of Award

The Federal awarding agency or pass-through entity will decide on the appropriate instrument of award: grant agreement, fixed amount award, cooperative agreement, or contract. The instrument of award has a significant impact on the relationship between the awarding entity and the grantee, as well as on the administrative guidelines for the award. Award documents must be received by the County prior to acceptance of the grant funds by the Board of County Commissioners.

Grant Agreement: A grant agreement is a financial assistance mechanism whereby money or other items of value is provided to carry out approved activities.

Fixed amount award: A type of grant agreement under which the Federal awarding agency or pass-through entity provides a specific level of support without regard to actual costs incurred under the Federal award. This type of Federal award reduces some of the administrative burden and record-keeping requirements for both the non-Federal entity and Federal awarding agency or pass-through entity. Accountability is based primarily on performance and results.

Cooperative Agreement: A Cooperative Agreement is a financial assistance mechanism used in lieu of a grant when substantial Federal programmatic involvement with the recipient during performance is anticipated by the awarding agency. A substantial involvement means that the recipient can expect Federal programmatic collaboration or participation in managing the project.

Contract: A legal instrument used to purchases property or services needed to carry out a project or program.

(2) Terms & Conditions

By accepting funds under a federal grant, the County agrees to comply with and include in all sub-grants, the grant provisions, all applicable federal statutes, regulations and guidelines, and any amendments. The County agrees to operate the funded program in accordance with the approved grant application and budget, supporting documents, and other representations made in support of the approved grant application. Any inconsistency in the Grant Award shall be resolved by giving precedence in the following order: (a) Applicable Federal Statute, (b) Awarding agency and other federal regulations, (c) Special Provisions, (d) General Provisions, (e) Notice of Funding Opportunity and (f) The approved grant application including assurances, certifications, attachments, and pre-award negotiations.

(3) Grant Set-up in SAP

The Internal Order Request Form must be completed and submitted to the Comptroller's Office to initiate the Internal Order (IO) set up along with supporting documentation. Supporting documentation (grant award documents, NOGA, etc.) must be included to substantiate the following:

- Amount of the grant;
- Name of the sponsor;
- CFDA number;
- Description of the grant;
- Time period of the grant (begin date and end date);
- Allowable indirect costs (or statement of "unallowable");
- Match required; and
- Request to Submit number must be included on the Request for New Internal Order form.

Electronic copies of supporting documentation should also be attached to the IO in SAP upon setup. Once the IO is established, department staff is responsible for completing the information required in the new "Task Monitoring" tab on the master data record.

(4) Board Acceptance of Grant Award

The Board of County Commissioners (BCC) has the sole authority to accept grants and cash donations from private and public sources or other financial assistance from the Federal government or any agency or instrumentality thereof and to comply with such conditions as may be necessary. All grant awards (except those of District Court) must be accepted by the BCC, or other authoritative Board e.g. District Board of Health. District Court grant awards are not approved by the BCC rather grant awards are submitted to the BCC to acknowledge receipt of the revenue and approval of the budget adjustments.

Department heads, division directors and managers are not authorized to sign grant award documentation and agreements, unless authorized to do so by action of the Board of County Commissioners or other authoritative board.

Grant Award: An award is financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money, or property in lieu of money, by the Sponsor to an eligible recipient. The term generally does NOT include technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; and contracts that are required to be entered under procurement laws and regulations. A grant award should be submitted to the Board of County Commissioners only after the formal grant award documents with applicable terms and conditions have been received.

When a grant is submitted to the BCC for approval the BCC Staff Report Template for grants must be used. The BCC Staff Report Template Grants can be downloaded from the County intranet at the Grants Division page, and is attached to this document as Appendix A. Specifically the following items must be included:

Subject Line:

- Funding Program Name
- Awarding Agency
- Award Amount
- Match Amount
- Grant Term Any award submitted for approval after the effective date, must identify the term as “retroactive from”
- Direct the Comptroller’s Office to make the necessary budget adjustments
- Commission Districts impacted

Summary:

If the award is approved retroactively, a summary statement must be included identifying the reason for retroactive approval.

Grant Award Summary:

The Grant Award Summary provides the County Commissioners, and the public with detailed information that defines the grant awarded.

Project/Program Name: Name of the Washoe County grant program/project.

Scope of the Project: Provide a brief summary of the project scope.

Benefit to Washoe County Residents: Provide a brief statement identifying the project’s benefit.

On-Going Program Support: Identify if the grant award will be used to support the costs of on-going programs. If so, describe how the program will be funded once the grant is complete.

Award Amount: Amount of the award identified on the award documents

Grant Period: Start date and end date on the award documents

Funding Source: Original sponsor entity/grantor of the funds

Pass Through Entity: Pass through entity awarding funds to the County (if applicable)

CFDA Number: Code of Federal Domestic Assistance number or NA if not federal grant funding.

Grant ID Number: Federal or State Grant ID number on award documents

Match Amount and Type: Identify the total amount of matching funds, and briefly describe the matching contribution.

Subawards and Contracts: If applicable identify any subawards or contracts anticipated as a component of this grant award. If known include the name of the sub-recipient(s) or contractor(s), amount of the award(s), and result of pre-award risk assessment and management supports for High Risk grantees; if unknown include a brief summary of the process for awarding the sub-grants and/or contracts.

Fiscal Impact:

- Grant internal order number, account number, and amount (revenue must equal expenses).
- Identify if a budget amendment is required and if so define the budget amendment needed: including cost object, account number, and amount.
 - If award amount was estimated in County approved budget, indicate budgeted amount and adjustment needed to equal the grant award amount.
 - If award is less than budgeted, indicate if there are any impacts on FTE/Personnel, and actions needed.
- Identify match amount, if any, cost object, and account number within current adopted budget where match will be charged.
- Identify if grant funds will be drawn as an advance or reimbursement
 - If reimbursement, identify the source of the upfront cash.
- Are indirect costs included in the grant budget?
- How much indirect cost does the department intend to collect?
\$ _____.

No grant funds shall be disbursed until the grant award has been approved by the Board of County Commissioners.

When awards are submitted for Agenda review the following items must be attached:

1. Award Documents

For Subgrants to other agencies:

1. Subrecipient Risk Assessment (for internal review)
2. SAM Debarment Status Check (for internal review)
3. Subrecipient Agreement checklist (for internal review)
4. Subrecipient Agreement
5. Subrecipient Resolution

B. Financial Management

(1) Reasonable, Allocable, and Allowable Costs

The foundation to financial management of grant funds is the allowability of costs. Only those costs that are allowable under the award can be charged to the grant (as direct or indirect), or considered as cost sharing or matching. The factors affecting the allowability of costs are unique to each Federal program and are found in the laws, regulations, and the provisions of the contract or grant agreements pertaining to the program. Uniform Guidance

Subpart E—Cost Principles, establishes principles and standards for determining costs for Federal awards carried out through grants, cost reimbursement contracts, and cooperative agreements. These principles must be used in determining the allowable costs of work performed by Washoe County under Federal awards. See Appendix B for Washoe County’s General Principles for Determining Allowable Costs.

These principles must also be used as a guide in the pricing of fixed-price contracts and subcontracts where costs are used in determining the appropriate price.

Reasonable Costs:

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. In determining reasonableness of a given cost, consideration must be given to:

- Whether the cost is necessary for the operation of the County or the proper and efficient performance of the grant award.
- The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, and other laws and regulations; and terms and conditions of the grant award.
- Market prices for comparable goods or services for the geographic area.
- Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the County, its employees, the public at large, and the Federal Government.
- Whether the County significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the grant award's cost.

Allocable Costs:

A cost is allocable to a particular grant award or other cost objective if the goods or services involved are chargeable or assignable to that grant award or cost objective in accordance with relative benefits received. This standard is met if the cost:

- Is incurred specifically for the grant award;
- Benefits both the grant award and other work of the County and can be distributed in proportions that may be approximated using reasonable methods; and
- Is necessary to the overall operation of the County and is assignable in part to the grant award in accordance with the Cost Principles.

Any cost allocable to a particular grant award may not be charged to other grant awards to overcome fund deficiencies, to avoid restrictions imposed by statutes, regulations, or terms and conditions of the grant awards, or for other reasons. This prohibition would not preclude the County from shifting costs that are allowable under two or more grant awards in accordance with existing statutes, regulations, or the terms and conditions of the grant awards.

Direct Cost Allocation Principles:

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding the paragraph above, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis.

Factors Affecting Allowability of Costs:

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under grant awards:

- Be necessary and reasonable for the performance of the grant award,
- Conform to any limitations or exclusions set forth in Cost Principles of the Uniform Guidance or in the grant award as to types or amount of cost items.
- Be consistent with policies and procedures that apply uniformly to both grant-funded and other activities of the County.
- Be accorded consistent treatment. *A cost may not be assigned to a grant award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the grant award as an indirect cost.*
- Be determined in accordance with generally accepted accounting principles (GAAP), except,
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- Be adequately documented.

(2) Prior Approval

Under any given Federal award, the reasonableness and allocability of certain items of costs may be difficult to determine. In order to avoid subsequent disallowance or dispute based on unreasonableness or nonallocability, the County may seek the prior written approval of the Federal awarding agency (or pass-through entity) in advance of the incurrence of special or unusual costs. Prior written approval should include the timeframe or scope of the agreement.

The absence of prior written approval on any element of cost will not, in itself, affect the reasonableness or allocability of that element, unless prior approval is specifically required for allowability as described under certain circumstances.

The following items **require** Prior Approval.

1. **Significant Changes:** Changes in principal investigator, project leader, project partner, or scope of effort must receive the prior written approval of the Federal awarding agency or pass-through entity; 2 CFR §200.201
2. **Cost Sharing:** Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity's approved negotiated indirect cost rate. 2 CFR §200.306
3. **Program Income Addition:** With prior approval of the Federal awarding agency, program income may be added to the Federal award by the Federal agency and the County. The program income must be used for the purposes and under the conditions of the Federal award. 2 CFR §200.307
4. **Program Income as Cost Sharing:** With prior approval of the Federal awarding agency, program income may be used to meet the cost sharing or matching requirement of the Federal award. The amount of the Federal award remains the same. 2 CFR §200.307
5. **Budget Revisions:**
 - Prior approval is required if there are changes in the budget related to: changes in a key person specified in the application for the Federal Award or changes in scope. Prior approval is required for these changes even if there are no changes in the budget. 2 CFR §200.308
 - Prior approval is required for the transfer of funds budgeted for participant support costs to other cost categories. 2 CFR §200.308
 - Unless described in the application and funded in the approved Federal Award, the subawarding, transferring, or contracting out of any work under a Federal Award requires prior approval. 2 CFR §200.308
 - Changes in the amount of cost sharing or matching. 2 CFR §200.308
 - The Federal awarding agency may, at its option, restrict the transfer of funds among direct cost categories or programs, functions and activities for Federal awards in which the Federal share of the project exceeds the Simplified Acquisition Threshold and the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget as last approved by the Federal awarding agency. 2 CFR §200.308
6. **Fixed Amount Subawards:** With prior written approval from the Federal awarding agency, a pass-through entity may provide subawards based on fixed amounts up to the Simplified Acquisition Threshold, provided that the subawards meet the

requirements for fixed amount awards in the Uniform Guidance 2 CFR §200.201 Use of Grant Agreements (including fixed amount awards), cooperative agreements, and contracts. 2 CFR §200.332

7. Administrative and Clerical staff as Direct Costs: The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if the following conditions are met:
 - Administrative or clerical services are integral to the project or activity;
 - Individuals can be specifically identified with the project or activity;
 - Such costs are explicitly included in the budget or have written approval of the Federal awarding agency; and
 - The costs are not also recovered as indirect costs.
8. Entertainment Costs: Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency. 2 CFR §200.438
9. Equipment and Other Capital Expenditures: Capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except with the prior written approval of the Federal awarding agency or pass-through entity.
 - Capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$5,000 or more have the prior written approval of the Federal awarding agency or pass-through entity.
 - Capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life are unallowable as a direct cost except with the prior written approval of the Federal awarding agency, or pass-through entity. See 2 CFR §200.436 Depreciation, for rules on the allowability of depreciation on buildings, capital improvements, and equipment. See also 2 CFR §200.465 Rental Costs of Real Property and Equipment.
10. Fines, penalties, damages and other settlements: Costs resulting from non-Federal entity violations of, alleged violations of, or failure to comply with, Federal, state, tribal, local or foreign laws and regulations are unallowable, except when incurred as a result of compliance with specific provisions of the Federal award, or with prior written approval of the Federal awarding agency. 2 CFR §200.441
11. Fundraising and Investment Management Costs: Fund raising costs for the purposes of meeting the Federal program objectives are allowable with prior written approval from the Federal awarding agency. 2 CFR §200.442
12. Housing for Personal Use: Costs of housing (e.g., depreciation, maintenance, utilities, furnishings, and rent), housing allowances and personal living expenses are only

allowable as direct costs regardless of whether reported as taxable income to the employees. In addition, to be allowable direct costs must be approved in advance by a Federal awarding agency. 2 CFR §200.445

13. Participant Support: Participant support costs are allowable with prior approval of the Federal awarding agency. 2 CFR §200.456
14. Pre-award Costs: Pre-award costs are those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.
15. Disposition of Equipment: Under specific circumstances the Federal awarding agency must be contacted for disposition instructions, see 2 CFR §200.313 for circumstances.
16. Travel Costs: Notwithstanding the provisions of 2 CFR §200.444, General Costs of Government, travel costs of officials covered by that section are allowable with the prior written approval of the Federal awarding agency or pass-through entity when they are specifically related to the Federal award. 2 CFR §200.474

(3) Direct Costs

Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a grant award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect cost. Identification with the grant award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs of grant awards.

Typical direct costs that are chargeable to grant awards are:

- Personnel costs for employees time devoted and identified specifically to the performance of the grant program;
- Cost of materials acquired, consumed or expended specifically for the purpose of the grant program;
- Equipment and other approved capital expenditures; and
- Travel expenses incurred specifically to carry out the activities of the grant program.

(4) Indirect Costs

Indirect costs are typically those costs incurred for a common or joint purpose that benefit multiple departments or programs. Consequently, an allocation methodology must be developed to fairly and consistently distribute these common “across the board” costs to departments or programs that received the benefit of the cost incurred. An indirect rate can be defined as the ratio of indirect costs to direct costs.

It is the intention of Washoe County to recover indirect costs at all opportunities. In support of departments' efforts to do so, the Budget Division procures a County-wide Cost Allocation Plan and Indirect Cost Rate report on an annual basis. This report is prepared to establish cost allocations of allowable costs and is prepared in accordance with the requirements of the Uniform Guidance.

The County-wide Indirect Cost Rate, contained in the County Cost Allocation Plan, is calculated utilizing detailed allocable costs, and varies from year to year. All departments are directed to use the County-wide Indirect Cost Rate, as allowed by the Uniform Guidance; except where implementation of the indirect cost requirement would impair public safety, as determined by the appropriate constitutional officer or the Board of County Commissioners. The rate is to be applied to the appropriate salary and wage base to recover indirect costs for grants. The rate is not applied to benefits, equipment, supplies, contracts or other budget items.

Additionally, Washoe County utilizes the County Cost Allocation Plan to assess an allocation of indirect costs to all non-general fund departments, to account for their portion of central service costs. This process allows for more accurate and complete costing data to be assessed within the department or program where the service is provided. The allocation enables a clearer picture of the total cost of providing specific programs and services and is offset by any revenues dedicated for that purpose.

Washoe County is classified by the Federal government as a non-major local government, and as such, we are **NOT** required to have our County Cost Allocation Plan certified by a Federal Cognizant Agency. Non-major governmental units are not required to submit their proposals unless they are specifically requested to do so by the cognizant agency. See CFR 200 Appendix V State/Local Government Central Service Cost Allocation Plans D (3). Because of our non-major local government status, Washoe County does not have an identified Federal Cognizant Agency, when there is no OMB identified cognizant agency, the cognizant agency is determined based on the Federal agency providing the largest amount of Federal funds. To date we have **NOT** been requested to submit our Cost Allocation Plan for review. However, it is ready for submission upon request, at any time. The Washoe County Cost Allocation Plan is a public document, and as such, can be shared with any requesting entity, including potential grantors. The County Cost Allocation Plan report is reconciled to our annual financial statements during the report's preparation and, the County Cost Allocation Plan is reviewed annually by our external auditors, as part of their fiscal year end Comprehensive Annual Financial Report (CAFR) review.

Some larger Washoe County Departments also procure an annual departmental indirect cost rate proposal (ICRP) that can be applied to grant applications, to capture indirect administrative overhead costs of the department, exclusive of County-wide indirect costs.

So that Washoe County can maximize recovery of indirect costs incurred by County supported grants, all allowable indirect costs must be included in grant budget proposals, and subsequent draw requests submitted for reimbursement of these costs. Indirect cost revenue reimbursed will be recorded in the appropriate department or fund.

Federal Agency Acceptance of Negotiated Indirect Cost Rates:

The Uniform Guidance explicitly notes that the negotiated rate must be accepted by all Federal awarding agencies. If the Federal awarding agency deviates from the negotiated rates, they must implement, and make publicly available, the policies, procedures, and general decisions related to the deviation from the negotiated rate. (2 CFR §200.414(c)) Additionally pass-through entities are subject to the requirement to accept an approved federally recognized indirect cost rate, or if no such rate exists, negotiate a rate with the subrecipient. 2 CFR §200.331

(5) Cost Sharing or Matching

Sponsors regularly require that the grantee share a portion of the grant program costs; usually allowing either cash match or in-kind match. It is important to understand the specific requirements of the grant program in regard to matching costs, as there is some variation in the definition of cash match and in-kind match.

Cash Cost Share: Cash cost share is outlays of funds to support the total project through acquiring material, buying equipment, paying labor (including fringe benefits associated with that labor), and other cash outlays required to perform the statement of work.

In-Kind Cost Share: In-kind matching sources include: volunteer time, building space, equipment use, and property. In-kind cost share is the reasonable value of equipment, materials or other property used in the performance of the statement of work. In-kind contributions are sometimes hard to value (such as space, use of equipment, and intellectual property). The in-kind value of equipment (including software) cannot exceed its fair market value and must be prorated according to the share of its total use dedicated to carrying out the project. The in-kind value of space (including land or buildings) cannot exceed its fair rental value and must be prorated according to the share of its total use dedicated to carrying out the project.

Unrecovered Indirect Costs as Match: Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity's approved negotiated indirect cost rate.

Volunteer Services: Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching, if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by the County. When the work is not similar to work paid for by the County, rates must be consistent with rates paid in the local labor market. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.

A helpful tool in determining the value of volunteer time is the website for the nonprofit Independent Sector. The current value of volunteer time can be obtained by the State at the following link: https://www.independentsector.org/volunteer_time .

Third Party Employee Services: When a third-party organization furnishes the services of an employee, these services must be valued at the employee's regular rate of pay plus an amount of fringe benefits that is reasonable, necessary, allocable, and otherwise allowable, and indirect costs at either the third-party organization's approved federally negotiated indirect cost rate, provided these services employ the same skill(s) for which the employee is normally paid.

Key requirements for expenses used in meeting cost sharing or matching requirements:

- Verifiable from grantee's records
- Not included in matching for any other Federal programs
- Allowable under applicable cost principles
- Necessary and reasonable
- Not paid by the Federal government under a different award (Federal funds cannot match Federal funds, unless provided for by statute)
- Provided for in the approved budget when required by the Federal awarding agency
- Conform to other provisions of the Uniform Guidance, as applicable
- In-kind contributions are valued on an acceptable basis and the basis and valuation are documented

Expenses used in meeting cost sharing or matching requirements on awards must be supported in the same manner as expenses claimed for reimbursement. It is the responsibility of the grantee department to ensure that compliant documentation is maintained on all expenses used in meeting cost sharing or matching requirements. For detailed information on allowable cost share see Uniform Guidance section. 2 CFR §200.306

(6) Cash Management

Although advance payments are allowable, and are necessary in certain situations, the County typically receives grant funds on a reimbursement basis. When a County grant is funded on a reimbursement basis, program costs are paid for by County funds before reimbursement is requested from the sponsor.

All grant funds received in advance are reserved in fund balance for that program. Advanced grant funds are managed by the department receiving the funds and periodically monitored by the grant accountant in the Comptroller's Office for cash management requirements. When funds are advanced, recipient departments must follow procedures to minimize the time elapsing between the transfer of funds from the sponsor, and disbursement.

These procedures include:

1. Disburse funds received before requesting new funds.

2. Disburse program income, refunds and rebates before requesting new funds.
3. Limit cash advances to sub-recipient.
4. Forecast cash requirements for each program.
5. Compare forecast to actual expenditures, investigate variances (*This should be done by someone other than person authorized to do expenditures*).
6. Drawdowns should be based on actual cash outlays.
7. Tracking drawdowns against award amount.
8. To the extent possible segregate responsibilities
 - a. Forecasting cash requirements
 - b. Preparing request for draw downs
 - c. Reviewing and approving the request for draw down.
9. Department grant coordinator will calculate an estimate of the interest that could be earned on the advance, and if that amount exceeds \$500 per year, a yearly calculation is completed on the interest earned and is forwarded to the appropriate federal agency in accordance with 2 CFR §200.449.

(7) Reimbursement Requests

In order to minimize the cash outlay of County funds, grant funds are to be drawn down monthly. Grantee departments are responsible for requesting reimbursement of grant funds on a monthly basis. Grant billings need to be processed in SAP at the time of funds request. If the grant sponsor does not allow for monthly reimbursements, draws should be requested as frequently as permitted in the grant agreement.

In the event monthly grant expenses are immaterial, as determined by the Department, the draw may be postponed till the following month. Because each department's budget and available cash resources are different; each department shall set a minimum threshold for the amount of monthly expenses required to trigger a monthly draw request.

Reimbursement requests should reflect the actual costs expended during the billing period. It is **not allowable** to request reimbursement for a percentage of the grant based on the reporting period, such as 12% of an annual grant monthly, or 25% of a grant quarterly. Reimbursement requests require backup documentation (invoices, time and effort reports, SAP reports, etc.) for all expenses actually incurred during the period.

(8) Fiscal Year-end Reconciliation and Reporting

All grants must be reconciled to the County's general ledger as of the end of the fiscal year, June 30th, with confirmations that the expenditures accurately report the grant status required by the Comptroller's Office. A closing schedule of the required steps and deadlines for year-end is published by the Comptroller's Office by June, 1st of each year. In general, the grantee department will have about three (3) weeks in July to receive and process billings for the prior fiscal year, as well as processing adjustments and final billings.

To be reconciled to the County's general ledger, the individual grant internal order should report allowable expenses for the fiscal year and revenue for billings submitted to the granting agency. After grant confirmations are received, if needed, the Comptroller's Office will accrue the revenue earned, but not yet billed for each grant. Note that these accruals automatically reverse in the next fiscal year, so that the total revenue over the life of the grant will reflect only actual billings.

If reporting or other issues cause delays in receiving material payments on grant billing beyond the allowed 90 days (for governmental funds), then the Comptroller's Office will reverse the revenue posted to the internal order and, instead, show a deferred revenue liability on the fund's books. Timely collection of grant billings is recommended, because this deferral will reduce fund balance and, for some special revenue funds, could limit the carry-forward of encumbrances.

An additional reporting requirement at year-end is providing the list of Federal commodities and/or equipment receipts and their values to the Comptroller's Office. These items, with supporting documents, are a requirement component of the Federal Single Audit.

(9) Program Income

Program income is income directly generated by the grant supported activity, or earned only as a result of the grant agreement during the grant period. The grant period is the time between the effective date of the award and the end date of the award reflected in the final financial report.

In the event that a Federal grant project generates program income the funds shall be used as follows and/or as stated in the terms of the grant award. Program Income funds shall be used for the purposes and under the conditions of the grant agreement.

1. **Deduction:** Ordinarily program income shall be deducted from total allowable costs to determine the net allowable cost. Program income shall be used for current costs unless the awarding agency authorizes otherwise. Program income which the County did not anticipate at the time of award shall be used to reduce the Sponsor and County contributions rather than to increase the funds committed to the project.
2. **Addition:** When authorized, program income may be added to the funds committed to the grant agreement by the Sponsor and the County. Program income shall be used for the purposes and under the conditions of the grant agreement.
3. **Cost Sharing or Matching:** When authorized by the Sponsor, program income may be used to meet the cost sharing or matching requirements of the grant agreement. The amount of the grant award remains the same.

Program income is required to be reported in the County's financial records using a unique and identifiable general ledger account or internal order for proper reporting on the County's SEFA.

(10) Documentation of Personnel Expenses

Many grantees make mistakes in charging time for Federal reimbursements. Below are some of the most prevalent time keeping mistakes.

| Top Timekeeping Mistakes |
|---|
| 1. Charging eight straight hours per day to a grant (time reporting must be actual and therefore an employee cannot charge eight straight hours, as it is probable that there might be other work assigned that occurred during that work day). |
| 2. Charging a fixed percentage of time to a grant (percentages may work to develop a budget, but time reporting must be actual and therefore, time must be recorded as it happens). |
| 3. Not using information from the activity record to charge the grant. |
| 4. Not including sick time and vacation (if these items are not included on the time and activity record, it is not possible to allocate expenses to the proper accounts). |
| 5. Not linking time to an eligible activity (if time is not linked to a grant eligible activity, it is not reimbursable with Federal funds). |
| 6. Not linking time to an eligible grant. |
| 7. Not identifying a project and/or client (time that cannot be linked to an eligible project and/or client is not eligible for Federal reimbursement, because it cannot be allocated to a grant). |
| 8. Not showing time spent on non-grant activities (while the grant only reimburses for grant eligible activities, the time and activity record must show all work done to determine, which time is eligible and what time is not). |

Special attention must be paid to the documentation of staff time funded with grant dollars. For personnel costs to be allowable for reimbursement, appropriate documentation is required.

When employees work solely on a single Federal award or cost objective, charges for their salaries and benefits will be coded to the grant through the position control in SAP, and the employee’s supervisor will approve the time and account coding.

Most County employees funded by grants will be working on more than one activity or project (possibly more than one grant project). When an employee works on more than one activity or project, the employee will code their time to the grant on their time entry and their supervisor will approve the time and account coding before releasing to payroll for processing.

The documentation supporting compliant time and activity records:

- Reasonably reflect the total activity for which the employee is compensated by the county, not exceeding 100% of compensated activities;
- Encompass both federally assisted and all other activities compensated by the county on an integrated basis;
- Comply with the established accounting policies and practices of the county;
- Support the distribution of the employee's salary or wages among specific activities or cost objects if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity or direct or indirect cost activity.

Washoe County has a system for tracking actual time spent on grant eligible activities. The County's Employee Self Service (ESS) system can be effectively used to meet all of the required standards for personnel expense documentation. Departments should utilize the ESS system for recording grant eligible activity.

Payroll reports should be used to determine actual salary expenses by tying eligible grant activities back to approved budgets, and allowable expenses. SAP Report **zpc00_grant_man** can be used for documenting and requesting reimbursement for payroll expenses relating to grants.

(11) Substitute Systems for Allocating Salaries and Wages

Substitute systems for allocating salaries and wages to Federal awards may be used in place of activity reports. These systems are subject to approval, if required by the cognizant agency. Such systems may include, but are not limited to, random moment sampling, case counts, or other quantifiable measures of employee effort.

Substitute systems which use sampling methods (primarily for Temporary Assistance to Needy Families (TANF), Medicaid, and other public assistance programs) must meet acceptable statistical sampling standards including:

- The sampling universe must include all of the employees whose salaries and wages are to be allocated based on the sample results.
- The entire time period involved must be covered by the sample; and
- The results must be statistically valid and applied to the period being sampled.

(12) Period of Performance

The Federal awarding or pass-through entity must specify the period of performance. The time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. A grantee may charge to the award only those expenses resulting from obligations incurred during the funding period and any pre-award costs authorized by the awarding agency. Also, if authorized, unobligated balances may be carried

over and charged for obligations of a subsequent funding period. Grantee department staff and management should be aware of grant cut-off dates.

(13) Internal Controls

Washoe County has established effective internal controls over Federal awards. Internal controls provide reasonable assurance that an entity is managing the Federal award in compliance with Federal regulations, statutes, and the terms and conditions of the award. The County's internal controls for grants are developed and maintained by the Comptroller's Office, and are attached as Appendix C Washoe County Internal Controls – Overview – FY 2015-16 Grants. The most current version of the grants internal controls are posted on the Grants Division webpage and the Comptroller's Office webpage.

Department grant coordinators should be familiar with the Washoe County internal controls for grants, and ensure that grant management within their department are in compliance with the internal controls.

C. Purchasing Goods and Services

Procurement systems and procurement activities impact all phases of grant management from the pre-award phase to post-award closeout. Guidelines for procuring goods and services with Federal funds can be found primarily in the Uniform Guidance. Federal grant procurement requirements are in addition to State statutory purchasing requirements contained in NRS 332, County Code requirements, and the County's purchasing policies and procedures.

(1) Conflict of Interest

Grant audit findings due to conflicts of interest can damage the reputation and credibility of the County. Further, the appearance of a conflict of interest can be just as damaging to the County's reputation and credibility as an actual conflict. Washoe County Code 5.335 and 5.337 defines conflicts of interest for all Washoe County employees. The purpose of this policy is to avoid the actuality, as well as the appearance, of a conflict of interest or breach of trust by an official or employee of the County.

No officer or employee of the County shall have any interest, financial or otherwise, direct or indirect, or have any arrangement concerning prospective employment that will, or may be reasonably expected to, bias the design, conduct, or reporting of a grant funded project on which he or she is engaged in the selection, award or administration.

The department grant coordinator for each particular grant funded project shall ensure that in the use of project funds, officials or employees of the County or of the sub-recipients shall avoid any action that might result in, or create the appearance of:

- Using his or her official position for private gain
- Giving preferential treatment to any person or organization
- Losing complete independence or impartiality
- Making an official decision outside of official channels

- Affecting adversely public confidence in the grant funded program in particular and the County in general

No employee, officer or agent of Washoe County shall participate in selection, or in the award or administration of a contract supported by grant funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

1. The employee, officer, or agent,
2. Any member of his or her immediate family,
3. His or her partner, or
4. An organization, which employs or is about to employ any of the above, has a financial or other interest in the firm selected for award.

County officers, employees, or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub agreements.

An officer or employee shall not directly or indirectly use or attempt to use the officer's or employee's official authority or influence to intimidate, threaten, coerce, command, influence, or attempt to intimidate, threaten, coerce, command, or influence another officer or employee, as applicable, in an effort to interfere with or prevent the disclosure of information concerning improper governmental action.

Employees shall not engage in any employment, activity or enterprise which has been determined to be inconsistent, incompatible or in conflict with their duties as Washoe County officers and employees, or with the duties, functions or responsibilities of their appointing authorities or departments by which they are employed.

The grant awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest. The grantee department must disclose in writing any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy.

(2) Mandatory Disclosures

The non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Non-Federal entities that have received a Federal award including the term and condition outlined in Appendix XII—Award Term and Condition for Recipient Integrity and Performance Matters are required to report certain civil, criminal, or administrative proceedings to SAM. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338 Remedies for noncompliance, including suspension or debarment. (See also 2 CFR part 180, 31 U.S.C. 3321, and 41 U.S.C. 2313.) 2 CFR §200.113

(3) Subrecipient or Contractor

It is not uncommon for a grant program to make use of contractors or subrecipients in order to effectively implement a project. The Uniform Guidance requires the County, as the pass-through entity, to make case-by-case determinations whether each arrangement resulting from a particular award creates a subrecipient or contractor relationship between the County and that organization.

The accurate classification of subrecipients and contractors is critical to a program's success and integrity. Federal administrative and audit requirements flow through to subrecipients, but not to contractors. Procurement activities with contractors are subject to different standards and requirements than agreements with subrecipients.

Subrecipients: A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient.

Contractors: A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See 2 CFR §200.22 Contract.

Subrecipient and Contractor Determination

| SUBRECIPIENT | CONTRACTOR |
|--|---|
| Determines who is eligible to receive what Federal financial assistance | Provides the goods and services within normal business operations |
| Has its performance measured in relation to whether objectives of the Federal program are met | Provides similar goods or services to many different purchasers |
| Has responsibility for programmatic decision making | Normally operates in a competitive environment |
| Has responsibility for adherence to applicable Federal program requirements specified in the award | Provides goods or services that are ancillary to the operation of the Federal program |
| Uses the Federal funds to carry out a program for a public purpose specified in authorized statute | Is not subject to compliance requirements of the Federal program |

All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

There may be unusual circumstances or exceptions to the listed characteristics. In making the determination whether a subrecipient or a contractor relationship exists, the substance of the relationship is more important than the form of the agreement or the profit or non-profit status of the parties. Regardless of what the agreement is called it's the nature of the relationship between the parties and the principle purpose of the work being performed that

determine whether it is grant assistance or procurement and thus, which standards and regulations apply.

If the primary purpose of the activity is to directly enhance the program or serve the program participants, it is generally a grant. If the work or product will benefit or support the agency responsible for the program, it is likely a contract. In some instance the appropriate award instrument is clear, when it is not, it may be necessary to scrutinize the role of the party delivering the services to make the proper determination. Is the entity providing these same services for profit to multiple customers in a competitive environment? If so, the entity is a contractor. Is the entity already operating a program to assist these clients and using the funds to build on or expend the services? If so, the entity is a subrecipient.

The subrecipient vs. contractor role should be assessed early in the grant cycle beginning with the grant program design and included in the grant proposal. It is critical that the determination is made early in the purchasing process, if not before. Early determination facilitates the request and consideration of appropriate information during the selection process, and impacts whether the resulting agreements include appropriate terms and conditions that require compliance with program requirements. The responsibilities contracted to an organization ultimately affect the level of oversight that needs to occur by the County in order to best manage the risks that impact the program's integrity and overall success.

Departments should use Appendix E Washoe County Subrecipient and Contractor Determination Form to guide the assessment and to document the determination.

(4) Procurement

The first rule of procurement standards for grant management dictates that when procuring goods and services with grant funds County employees comply with Washoe County procurement procedures. These procedures can be found in the Washoe County Purchasing Division's, Purchasing Policies and Procedures Manual. Additionally the following sections define procurement policies, and procedures for grant funded purchasing. All grant procurement guidelines apply to the entire grant program budget including grant funds, matching funds, and program income.

Procurement requests from departments to the Purchasing Division must include assurance by the department that all special procurement conditions have been identified and relayed to Purchasing, or the department may request technical assistance from the County Grants Administrator to ensure that special procurement conditions have been identified and relayed to Purchasing.

County grantees will identify a contract administrator to maintain oversight and ensure that contractors perform in accordance with the terms, conditions and specifications of their contracts or purchase orders.

The contract administrator in most cases will be someone located in the department directly benefiting or overseeing contract performance. The contract administrator is responsible for

the performance of the contract and should alert the Purchasing Division and/or the County Grants Administrator if there are specific contract compliance issues that the contract administrator is unable to resolve.

The grantee department must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made for lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

a. Procurement Records:

An essential component of the procurement process is careful, accurate documentation of the procurement. The records must be sufficient to provide a significant history of the procurement. The procurement file should be a comprehensive record of all the activities, and decisions of the procurement process. The grant procurement file must include, but is not limited to the following documentation.

1. Selection procedures for the procurement transactions;
2. The rationale for the method of procurement;
3. Selection of contract type;
4. Contractor selected or rejected; and
5. The basis of contract price.

Additionally, the documentation must verify that the procurement provided for full and open competition. In those cases where competition was limited, the documentation must support the rationale to limit competition.

b. Full and Open Competition:

All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards of the Uniform Guidance 200.319. Some of the situations considered to be restrictive of competition include, but are not limited to:

1. Placing unreasonable requirements on firms in order for them to qualify to do business.
2. Requiring unnecessary experience and excessive bonding.
3. Noncompetitive pricing practices between firms or between affiliated companies.
4. Noncompetitive awards to consultants that are on retainer contracts.
5. Organizational conflicts of interest.
6. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.

When using Federal funds the County will conduct procurement in a manner that prohibits the use of statutorily or administratively imposed in-state or local geographic preference in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference.

Washoe County must follow Federal procurement procedures for grant expenditures when they are more restrictive than our State and local procurement practices. Federal procurement procedures do not recognize NRS bidding exemptions including professional services. An adequate number of quotes are required for professional services unless the procurement meets the non-competitive procurement criteria. Refer to the Washoe County Purchasing Division's, Purchasing Policies and Procedures Manual to ensure compliance with procurement standards.

c. Methods of Procurement:

In Uniform Guidelines 200.320 the following procurement methods are identified. *If you are uncertain of the appropriate method, consult with the Purchasing Division and review the information provided in 2 CFR 200.317-200.326.*

1. Procurement by micro-purchases: Acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$3,000 (or \$2,000 in the case of acquisition for construction subject to Davis-Bacon Act). To the extent practicable micro purchases must be distributed equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the price is considered reasonable.
2. Procurement by small purchase procedure: Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies and other property that do not cost more than the State required acquisition threshold (currently \$50,000 or less per NRS 332.039). If small purchase procedures are used, price and rate quotations shall be obtained from an adequate number of qualified sources. Written quotes should be obtained from at least two qualified sources.
3. Procurement by sealed bids (formal advertising): Bids are publically solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid is deemed to be the lowest, responsible bid pursuant to NRS 332.065 and conforms to all the material terms and conditions of the invitation for bids. Sealed bid method is the preferred method for procuring goods and services in excess of \$50,000 and public works construction in excess of \$100,000. If sealed bids are used the following requirements apply:
 - a. The invitation of bids must be publically advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids;

- b. The invitation of bids which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
 - c. All bids will be publically opened at the time and place prescribed in the invitation for bids;
 - d. A firm fixed price contract award will be made in writing to the lowest responsive and responsive bidder;
 - e. Any and all bids may be rejected if there is a sound documented reason.
4. Procurement by competitive proposals: The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids and price is just one of many considerations. If this method is used the following requirements apply:
- a. Request for proposal must be publicized and identify all evaluation factors and their relative importance. Any response to publicized request for proposals must be considered to the maximum extent practical;
 - b. Proposals must be solicited from an adequate number of qualified sources;
 - c. A written method for conducting the technical evaluation of the proposals received and for selecting recipients, must be used and included in the file;
 - d. Contracts must be awarded to the responsive firm whose proposal is most advantageous to the program, with price and other factors considered; and
 - e. The grantee may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.
5. Procurement by noncompetitive proposals: Procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.
- a. Procurement by noncompetitive proposals may be used only when one of the following circumstances applies:
 - The item is available only from a single source;
 - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
 - The awarding agency authorizes noncompetitive proposals; or

- After solicitation of a number of sources, competition is determined inadequate.

Noncompetitive awards to professionals or consultants that are on retainer contracts are restrictive of competition and not allowable under OMB guidelines.

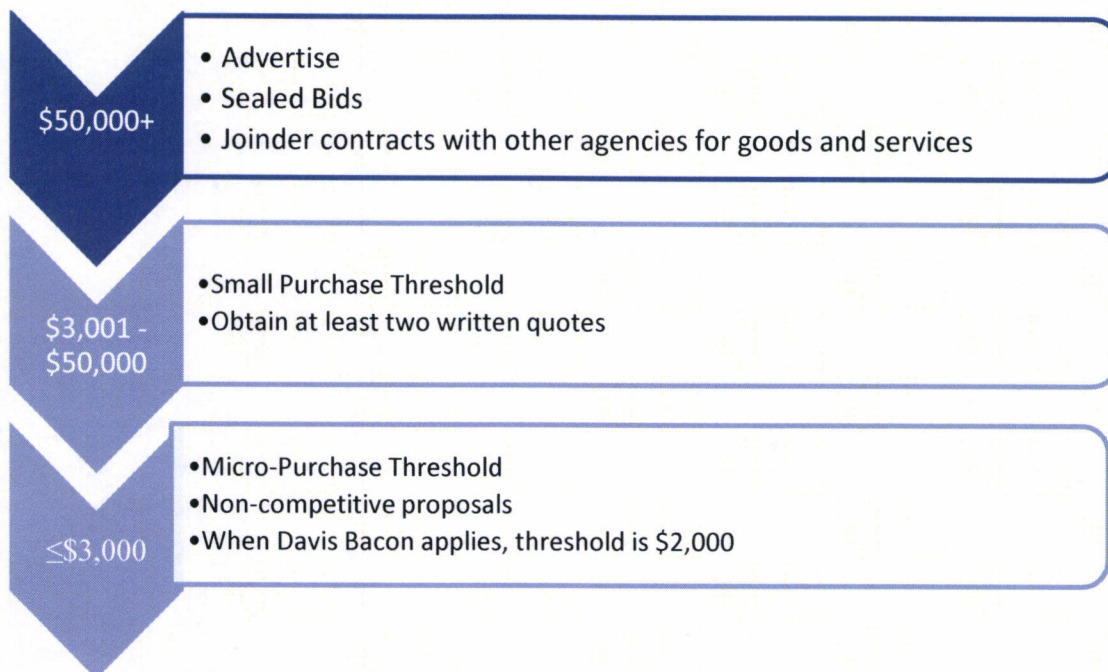
d. Solicitations:

The grantee department must ensure that all solicitations:

1. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and
2. Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.
3. The grantee department must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the grantee department must not preclude potential bidders from qualifying during the solicitation period.

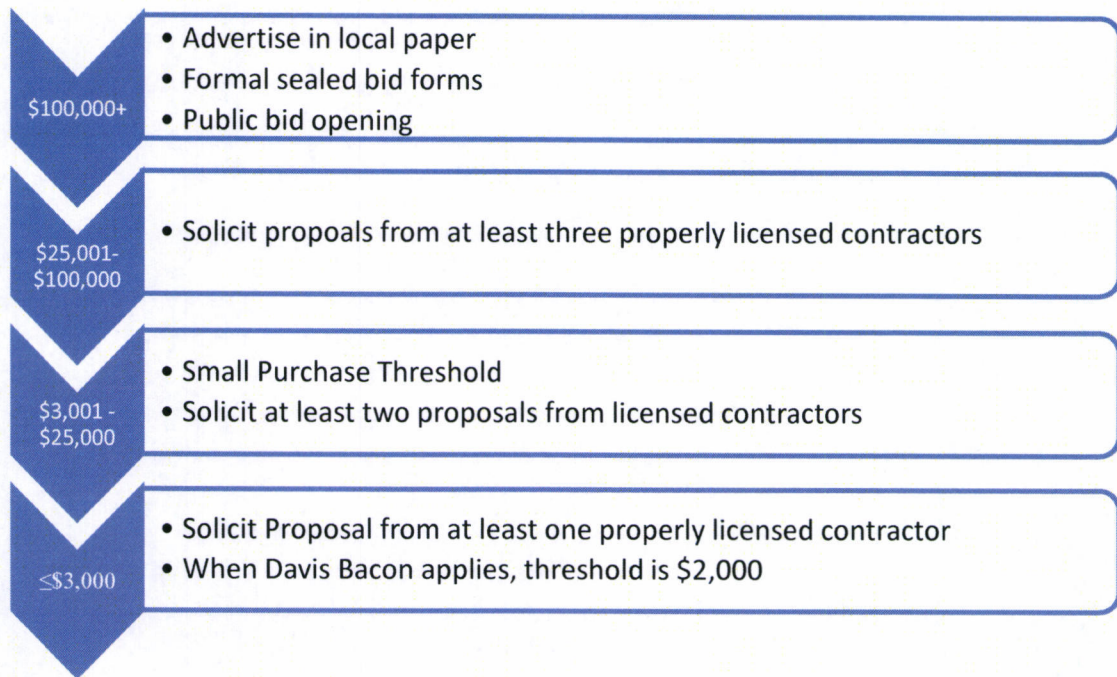
e. Purchasing Summary:

Grant Funded Services and Supplies



- Up to \$3,000 (\$2,000 in the case of acquisition for construction subject to Davis Bacon) may be awarded without solicitation of competitive quotations if the price is determined to be reasonable.
- \$3,001 (or \$2,000 if subject to Davis Bacon) - \$50,000 obtain at least two written quotes and submit with purchase requisition.
- \$50,001 and above for services and supplies require advertising in the newspaper. Joinder contracts with other agencies for goods and services may be used in lieu of the above.
- All purchases in excess of \$100,000 per year require Board approval.
- Exemptions under NRS 332.115 do not apply to grant funded procurement.

Grant Funded Public Works

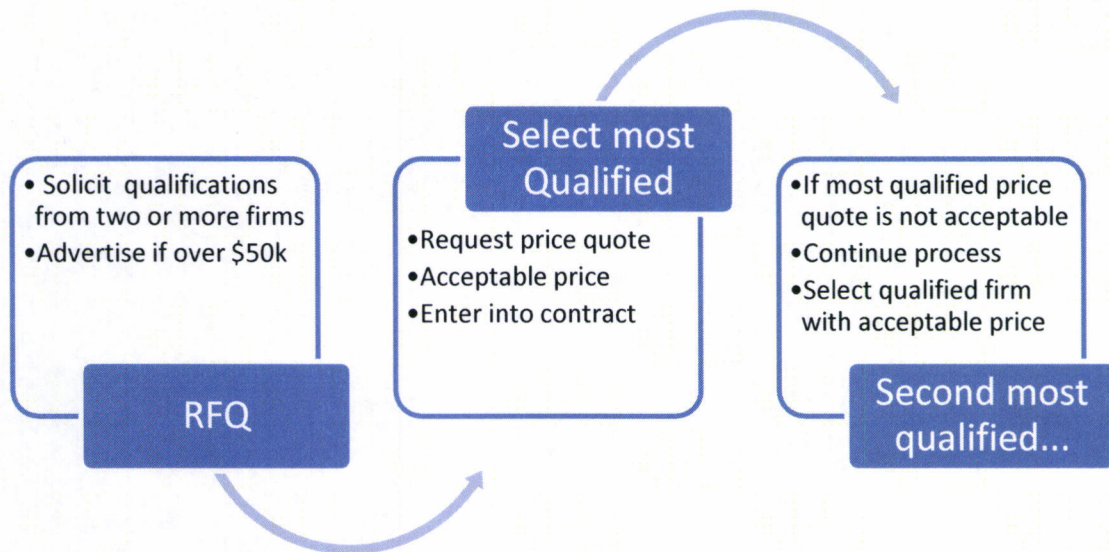


- \$0 - \$3,000 (\$2,000 in the case of acquisition for construction subject to Davis Bacon) solicit a proposal from at least one properly licensed contractor.
- \$3,001 (or \$2,000 if subject to Davis Bacon) - \$25,000 solicit proposals from at least two properly licensed contractors.
- \$25,000+ - \$100,000: solicit proposals from at least three properly licensed contractors. At least once each quarter, prepare and maintain in the contract file, a report for each contract awarded in this manner detailing the name of the contractor, amount of the contract, brief description of the project and the names of all contractors from whom bids were solicited.
- Over \$100,000: must advertise in a local newspaper, use formal sealed bid forms, and process with public bid opening. Award on bid forms.
- Exemptions under NRS 332.115 do not apply to grant funded procurement.

f. Professional Services:

Services performed by an independent contractor within the scope of accounting, medicine, architecture, law, engineering or other licensed professions.

Grant Funded Architectural/Engineering Professional Services



Grant-funded Architectural/Engineering professional services may be purchased using qualifications based procurement. For A/E professional services the steps include the following:

1. Conduct RFQ to two or more firms up to \$50,000 and advertise RFQ in newspaper, if project is over \$50,000. Do not ask for price.
2. Select most qualified.
3. Request price quote from firm selected as most qualified
4. Enter contract, if price is acceptable
5. If price is not acceptable, go to second most qualified and request price.
6. Process continues until a firm deemed qualified and with acceptable price is selected.

The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services.

g. Small and Minority Businesses, Women’s Business Enterprises:

When Federal funds are used affirmative steps must be taken to assure that minority firms, women’s business enterprise, and labor surplus area firms are used when possible.

Affirmative steps shall include:

1. Placing qualified small and minority business and women’s business enterprises on solicitation lists;
2. Assuring that small and minority business and women’s business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business and women’s business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business and women’s business enterprises;
5. Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency for the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

h. Contract Type:

At Washoe County nearly all of our contracts are fixed-price contracts. Fixed-price types of contracts provide for a firm price or, in appropriate cases, an adjustable price. Fixed-price contracts providing for an adjustable price may include a ceiling price, a target price (including target cost), or both. Unless otherwise specified in the contract, the ceiling price or target price is subject to adjustment only by operation of contract clauses providing for equitable adjustment or other revision of the contract price under stated circumstances.

A firm-fixed-price contract provides for a price that is not subject to any adjustment on the basis of the contractor’s cost experience in performing the contract. This contract type places upon the contractor maximum risk and full responsibility for all costs and resulting profit or loss. It provides maximum incentive for the contractor to control costs and perform effectively and imposes a minimum administrative burden upon the contracting parties.

Cost-reimbursement types of contracts provide for payment of allowable incurred costs, to the extent prescribed in the contract. These contracts establish an estimate of total cost for the purpose of obligating funds and establishing a ceiling that the contractor may not exceed (except at its own risk) without the approval of the contracting officer. Cost-reimbursement contracts are suitable for use only when uncertainties involved in contract

performance do not permit costs to be estimated with sufficient accuracy to use any type of fixed-price contract.

The fixed price contract places the risk on the vendor, while the cost- reimbursement contract places the greater risk on the County.

i. Contact Cost and Price:

For every procurement action, including contract modifications, the grantee department must perform a cost or price analysis. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, grantees must make independent estimates before receiving bids or proposals. Some form of cost or price analysis shall be made and documented in the procurement file in connection with every procurement action.

Price Analysis: Comparison of prices of multiple bids or information from other sources such as established catalogs or market prices, or prices for similar past purchases.

Cost Analysis: Evaluation of the separate elements that make up a contractor's total cost proposal or price to determine if they are allowable, directly related to the requirement and reasonable for the value received.

Grantees will negotiate profit as a separate element of price for each contract in which there is not price competition and all cases where cost analysis is performed.

Costs or prices based on estimated costs for contracts under grants will be allowable only to the extent that costs incurred or cost estimates in negotiated prices are consistent with the Uniform Guidance, Cost Principles.

The cost plus percentage of cost and percentage of construction cost methods for contracting shall not be used.

j. Contract Provisions:

All contracts made by Washoe County under a Federal award must contain provisions covering the following as applicable. (see Uniform Guidance 2 CFR Pt. 200 App.II.)

- a. Contracts for more than the simplified acquisition threshold currently set at \$150,000, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.
- b. All contracts in excess of \$10,000 must address termination for cause and for convenience by the County including the manner by which it will be effected and basis for settlement.

- c. Equal Employment Opportunity: All contracts that meet the definition of federally assisted construction contract must include the equal opportunity clause provision.
- d. Davis Bacon Act: All prime construction contracts of \$2,000 or more must include a provision for compliance with Davis Bacon.
- e. Contract Work Hours and Safety Standards Act: Where applicable, all contracts in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C 3701-3708.
- f. Rights of inventions made under a contract or agreement: As applicable, if Washoe County or a subrecipient of Washoe County enters into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, development or research work under the funding agreement, the County or the subrecipient must comply with the requirements of 37 CFR Part 401.
- g. Clean Air Act and Federal Water Pollution Act: Contracts and sub-grants of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations under the Clean Air Act and the Federal Water Pollution Act.
- h. Mandatory standards and policies relating to energy efficiency which are contained in the State energy conservation plan.
- i. Debarment and suspension: A contract award must not be made to parties listed on the government wide Excluded Parties List System in the System for Award Management (SAM).
- j. Byrd Anti-Lobbying Amendment: Contractors that apply or bid for an award of \$100,000 or more must file the required certification.

(5) Davis-Bacon and Related Acts

The Davis-Bacon and Related Acts (DBRA) requires all contractors and subcontractors performing work on Federal or District of Columbia construction contracts or federally assisted contracts in excess of \$2,000 to pay their laborers and mechanics not less than the prevailing wage rates and fringe benefits for corresponding classes of laborers and mechanics employed on similar projects in the area. The prevailing wage rates and fringe benefits are determined by the Secretary of Labor for inclusion in covered contracts. Laborers and mechanics must be paid the higher of the two wage rates: Davis-Bacon prevailing wage or State Prevailing wage.

In addition to the Davis-Bacon Act itself, Congress added Davis-Bacon prevailing wage provisions to approximately 60 laws "related Acts" under which Federal agencies assist construction projects through grants, loans, loan guarantees, and insurance. (Examples of the related Acts are the Federal-Aid Highway Acts, the Housing and Community Development Act of 1974, and the Federal Water Pollution Control Act). Generally, the application of

prevailing wage requirements to projects receiving Federal assistance under any particular "related" Act depends on the provisions of that law.

The Davis-Bacon and Related Acts (DBRA), require that grantees ensure that all bid documents, contracts and subcontracts for DBRA covered work contain Federal labor standards provisions and the applicable Davis-Bacon wage decision.

Under the DBRA, covered contractors must maintain payrolls and basic records and submit certified weekly payrolls. Although use of form WH-347 is optional, the form will satisfy the requirements of Regulations, Parts 3 and 5 (29 CFR, Subtitle A), as to payrolls submitted in connection with contracts subject to the DBRA. Records to be maintained include:

- Name, address, and social security number (last 4 digits) of each employee;
- Each employee's work classification(s);
- Hourly rate(s) of pay (including rates of contributions or costs anticipated for bona fide fringe benefits or cash equivalents thereof);
- Daily and weekly numbers of hours worked;
- Deductions made; and
- Actual wages paid.

The grantee must collect the payroll records, using the Department of Labor Form WH- 347 or its equivalent, for all laborers and mechanics for all weeks of project construction. These payroll records must be collected from the prime contractor for each contract and checked **each week**.

The grantee must document, using General Services Administration Form SF-1445 or its equivalent, that wage interviews were conducted periodically to verify that contractors and subcontractors are paying the appropriate wage rates. It is recommended that at least two interviews be conducted on every project, which will take six or fewer months to complete. A higher frequency is recommended for projects, which will take twelve or more months to complete or where the grantee finds a pattern of errors in weekly payroll submissions.

Every employer performing work covered by the labor standards of the DBRA shall post a notice (including any applicable wage determination) at the site of the work in a prominent and accessible place where it may be easily seen by employees.

Labor Standards Objectives:

1. Apply Davis-Bacon requirements properly: Make sure that labor standards, including Davis-Bacon prevailing wage rates, are applied where required. Ensure that any exemptions or exceptions are identified.
2. Through education and advice, support contractor compliance with labor standards. Provide basic training and technical assistance to contractor to ensure that they understand their obligations under prevailing wage and reporting requirements.

3. Monitor contractor performance: Perform reviews of certified payroll submissions and other information to help ensure contractor compliance with labor standards provisions and the payment of prevailing wages to workers.
4. Investigate probable violations and complaints of underpayment: Thoroughly explore any evidence of violations, especially allegations of underpayment.
5. Pursue debarment and other available sanctions against repeat labor standards violators.

It is the responsibility of the grantee department to ensure that the DBRA requirements are met on all contracts of \$2,000 or more when Federal funds are used. The above description of DBRA requirements is a summary of the primary requirement and is not intended as a complete representation of the activities necessary to ensure compliance. When DBRA applies the grantee department should work closely with the Community Services Department to ensure their grant implementation is compliant with all requirements.

6. Debarment and Suspension

Federal Executive Orders 12549 and 12689 require that a contract or grant award with an amount expected to equal or exceed \$25,000 shall not be made to parties listed on the government wide Excluded Parties List System. The Excluded Parties List System contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than E.O. 12549. A number of sponsor agencies require verification of debarment and suspension status on all grant funds expended on any award (subgrant or contract).

The Excluded Parties List System (EPLS) on the System for Award Management (SAM) website will be checked for exclusions before an award is made. For all contracts using Federal funds the Purchasing Division will check the EPLS for exclusions before a purchase order is issued.

- For small purchases using a County Procurement Card no debarment check is required when the purchase is within standard ProCard limits.
- For subgrant awards the grantee department must check the EPLS for each subgrantee agency prior to submitting an agreement to their authorizing Board. See Appendix D Instructions on conducting a SAM search.

When the debarment verification is conducted by the grantee department, documentation of the status check must be included in the grant record. A copy of the entity status should be printed and included in the grant file. If the grant file is maintained in electronic format, an electronic copy of the verification is allowable. If using paper files, it is recommended that the printout also be signed, as some sponsors request this level of documentation. When the status check is conducted by the Purchasing Division the dated screen view is attached to the purchase documentation in SAP.

No award (contract or sub-grant) is to be made before debarment status has been reviewed and no exclusions found. Grant files should include documentation verifying the excluded parties review, and the contractor or subrecipient status as identified by EPLS.

(7) Subaward Programs

A subaward is an award of financial assistance in the form of money, or property in lieu of money, made under a grant by a recipient to an eligible subrecipient. A grantee that passes funds through to a subrecipient is responsible for monitoring their activities to ensure that the Federal dollars are used for authorized purposes in compliance with the Federal program laws, regulations, and grant agreements, and ensuring that performance goals are achieved.

As a pass-through entity the County is responsible for determining subrecipient eligibility. The specific requirements for subrecipient eligibility are unique for each Federal program and are found in the laws, regulations, and provisions of the contract or grant agreement pertaining to the program.

In addition to any programmatic eligibility criteria imposed by the specific grant program, for subawards made on or after October 1, 2010, a subrecipient must provide the County with their Dun and Bradstreet Data Universal Numbering System (DUNS) number before an award is made.

a. Pre-award Risk Assessment:

An evaluation of each subrecipient's risk of noncompliance with Federal statutes, regulations and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring is required by federal regulation 2 CFR, Part 200.331 (4)(b).

The assessment of County subrecipients must be conducted prior to a subaward and the results of the assessment must be taken into consideration when developing the monitoring plan. Departments should use Appendix E Washoe County Pre-award Risk Assessment Instructions and Form to guide the assessment and to document the determination.

The Washoe County pre-award risk assessment includes consideration of such factors as:

1. The subrecipient's prior experience with the same or similar subawards;
2. The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F-Audit Requirements of the Uniform Guidance, and the extent to which the same or similar subaward has been audited as a major program;
3. Whether the subrecipient has new personnel or new or substantially changed systems; and
4. The amount of the grant award. *Larger grants, such as those in excess of \$100,000, constitute a greater risk.*

If the subrecipient is determined to be High Risk, it is appropriate to impose specific conditions on the subrecipient.

Specific Conditions should include one or more of the following:

1. Requiring payments as reimbursements rather than advance payments;
2. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
3. Requiring additional, and/or more detailed financial reports;
4. Requiring additional project monitoring;
5. Requiring the grantee to obtain technical or management assistance; or
6. Establishing additional prior approvals.

Additionally the granting department may:

- Provide subrecipients with training and technical assistance on program-related matters; and
- Perform on-site reviews of the subrecipient's program operations.
- Arranging for agreed-upon-procedures engagements as described in 2 CFR §200.425 Audit Services.

The awarding Department must notify the subrecipient as to the nature of the additional requirements including:

1. The reason why the additional requirements are being imposed;
2. The nature of the action needed to remove the additional requirement, if applicable;
3. The time allowed for completing the actions if applicable, and
4. The method for requesting reconsideration of the additional requirements imposed.
5. Any specific conditions must be promptly removed once the conditions that prompted them have been corrected.

b. Subaward Agreement:

When Washoe County makes a subaward of Federal funds, it must ensure that the award is clearly identified to the subrecipient as a subaward of Federal funds.

All pass-through entities must: Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the County must provide the best information available to describe the Federal award and subaward. 2 CFR §200.331

The subaward agreement must include the following information:

- Subrecipient Name (must match DUNS number)
- Subrecipient DUNS number
- Federal Award Identification Number (FAIN)
- Federal Award Date¹
- Subaward Period of Performance (Start and End date)
- Amount of Federal Funds obligated by this action by County to Subrecipient
- Total amount of the Federal Funds obligated to subrecipient by County including current obligation.
- Total amount of the Federal Award committed to subrecipient by County
- Federal award project description, (purpose and intended outcomes)
- Name of Federal awarding agency, pass-through entity
- Contact information for the awarding official at County
- CFDA number and name
- Identification of whether the award is for research and development
- Indirect cost rate for the federal award (including if the de minimis rate is charged)
- Eligible expenses covered by the grant
- Special terms and conditions
- Reporting requirements (financial reports, and performance reports)
- Define how parties can make amendments to the agreement
- Requirement that subrecipient permit County and auditors to have access to subrecipient's records and financial statements
- Provision that authorizes monitoring the performance of the subrecipient
- Terms and Conditions concerning closeout of subawards
- Termination for cause or convenience
- Requirement that the subrecipient notify Washoe County if they become debarred or suspended
- Termination for cause or convenience
- Additional provisions imposed by County or granting department

Departments should use Appendix F Subaward Agreement Checklist to ensure and document that all required information is included in the agreement.

Board of County Commission Grant Award Resolution:

A grant or donation to a nonprofit organization created for religious, charitable, or educational purposes and a donation to a governmental entity pursuant to NRS 244.1505 must be made by resolution of the Board of County Commissioners. The resolution must specify:

- The purpose of the grant or donation;
- If applicable, the maximum amount to be expended from the grant; and

¹ Federal award date means the date when the Federal award is signed by the authorized official of the Federal awarding agency.

- Any conditions or other limitations upon the expenditure of the grant or the use of the donated property.

The resolution should go to the Board of County Commissioners for approval at the same meeting as the subaward agreement. Subgranting departments may use the Appendix G Sample Grant Award Resolution.

c. Subrecipient Monitoring:

Monitoring the subrecipient’s use of Federal funds is a required function of all subawards. Monitoring can be conducted using reporting, site visits, regular contact, or other means to provide reasonable assurance that the subrecipient administers Federal awards in compliance with laws, regulations and the provisions of contracts and grant agreements and that performance goals are achieved. The following factors affect the nature, timing and extent of the monitoring:

- Program Complexity: Programs with complex compliance requirements have a higher risk of non-compliance.
- Percentage passed through: The larger the percentage of program awards passed through the greater the need for subrecipient monitoring.
- Amount of awards: Larger dollar awards are of greater risk.
- Subrecipient risk: Subrecipients should be evaluated as higher or lower risk, to determine the need for closer monitoring. Generally, new subrecipients would require closer monitoring, as would subrecipients with a history of non-compliance.

Monitoring activities should occur throughout the year and may take various forms such as:

- Reporting: Reviewing financial and performance reports submitted by the subrecipient.
- Site Visits: Performing visits to the subrecipient organization to review financial records, programmatic records, client files, and observe operations.
- Regular Contact: Regular contacts with subrecipients and appropriate inquiries concerning program activities.

As a pass through entity Washoe County must monitor the activities of the subrecipient to ensure the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

Pass-through entity monitoring of the subrecipient must include:

1. Reviewing financial and performance reports required by the pass-through entity.
2. Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the

subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.

3. Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by 2 CFR §200.521 Management decision.

As part of the monitoring responsibilities, pass-through entities must verify that every subrecipient is audited in accordance with 2 CFR 200 Subpart F – Audit Requirements, when it is expected that the subrecipient’s Federal awards expended during the respective fiscal year equaled or exceeded the threshold of \$750,000. The pass through entity is also responsible for reviewing these audits; issuing a management decision on audit findings within six months after receipt of the subrecipient’s audit report; and ensuring that the subrecipient takes timely and appropriate corrective action on all audit findings.

The monitoring department must also consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

When there are issues of noncompliance the monitoring department must consider taking enforcement action against noncompliant subrecipients as described in 2 CFR §200.338 Remedies for Noncompliance of this part and in program regulations.

Monitoring Plans:

A written monitoring plan should be included in the grant file and regularly updated to document monitoring activities. The objective of grantee monitoring is twofold: 1) To ensure the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and terms and conditions of the award; 2) To ensure the subaward performance goals are achieved.

Grant files should include specific documentation that demonstrates the subrecipient monitoring activities that have been performed throughout the life of the subgrant. Departments should use Appendix H Monitoring Form Reports & Contacts and Onsite Monitoring Form or similar documents to facilitate and document the monitoring activities.

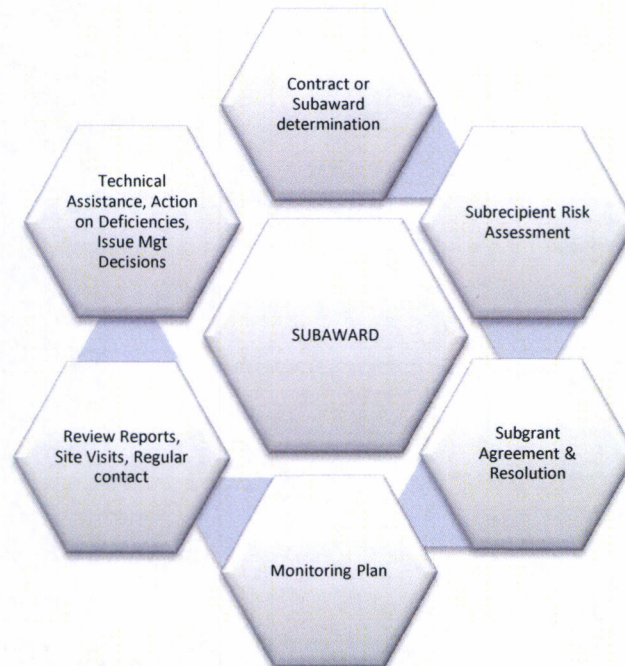
Subrecipient Monitoring Plans

| | |
|--------------------|---|
| High Risk | Quarterly/Monthly Site Visits Monthly Financial Reporting Monthly Progress Reporting Weekly Conference Calls |
| Medium Risk | Annual Site Visit Quarterly Progress and Financial Reports Periodic Conference Calls/Phone Visits |
| Low Risk | Annual Site Visit Review Single Audit Annual Progress and Financial Reports |

Fixed Amount Subawards:

With prior written approval from the Federal awarding agency, a pass-through entity may provide subawards based on fixed amounts up to the Simplified Acquisition Threshold, provided that the subawards meet the requirements for fixed amount awards in 2 CFR §200.201. Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts.

Subaward Life Cycle



(8) Equipment Management

For grants management purposes, equipment is defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which, equals or exceeds \$5,000.

2 CFR §200.33.

When equipment is purchased by Washoe County with grant funds, title vests with Washoe County unless otherwise noted in the grant award. The equipment must be used by the program or project for which it was acquired as long as needed, whether or not the project continues to be supported by Federal funds. If the purpose of the property changes, the equipment may be used in other activities currently or previously supported by a Federal agency. If the property is no longer needed, disposition of the property must be carried out in accordance with County code and the grant requirements. Prior approval is required for disposition of federally funded equipment.

All grant funded equipment will be recorded and tracked in the County's physical inventory system in SAP. County departments must ensure that their grant funded equipment data is included and maintained in the County's physical inventory system.

Detailed equipment information should be entered into SAP when entering a MIGO - Goods Receipt for the equipment. The process starts with the creation of the purchase requisition by checking the inventory asset flag. This will in turn create an equipment master record in "inactive" status. Once the goods are received and the MIGO transaction is completed, the status on the equipment master will change to "active". If a Goods Receipt is not entered for the equipment (e.g. Framework P.O., etc.) then the department must provide Purchasing with a Bar Code Request Form, and request the equipment be entered into inventory.

Federal guidelines require that property records must be maintained that include:

- A description of the property,
- A serial number or other identification number,
- The source of funding for the property including (Federal Award identification number FAIN),
- Who holds title,
- The acquisition date,
- Cost of the property,
- Percentage of Federal participation in the project costs for the Federal award under which the property was acquired,
- The location,
- Use,
- Condition of the property, and
- Ultimate disposition data including the date of disposal and sale price of the property.

The County's physical inventory system in SAP collects all of these data points. To review your department's equipment, use the SAP procedure ZA26 - Equipment Tracking Report for grants.

To update equipment information use the SAP procedure IE02, or ZMM_EQP_U – Equipment Update (Mass). It is the responsibility of the department to ensure that the applicable equipment detail is recorded in SAP. The Grant Committee Liaison is responsible for conducting or coordinating the annual review and update of their department’s grant funded equipment records.

Federal guidelines require a physical inventory of the property be taken and the results reconciled with the property records at least every two years. Washoe County Code Chapter 15, Sections 110 through 130 requires that each department complete an annual inventory of capital and fixed assets that are in the department’s possession in that calendar year.

Although the new Uniform Guidance characterizes communication and computing devices, like smart phones, tablets, etc., as supplies, in some cases funders require inventory tracking for items that cost below \$5,000 which would be considered “high risk” for personnel use or theft. These may include:

- Digital cameras and attachments
- Firearms
- Computer equipment, tablets and iPads
- Cell phones or items that may be assigned to an employee.

In situations where a grant funder requires inventory tracking of high risk items the same procedures for tracking of grant funded equipment must be followed.

Adequate maintenance procedures must be developed to keep the property in good condition. Additionally, a control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.

(9) Disposition of Federally Funded Equipment

In all cases disposition of federally funded equipment must comply with Federal guidelines 2 CFR §200.313(e). The Purchasing Division, under the supervision of the Purchasing and Contracts Manager, shall determine the most beneficial manner of disposal of County property and equipment.

Prior to disposal, the department staff responsible for the grant equipment shall complete the following assessment.

- 1) If the equipment is no longer needed for the program or project for which it was acquired, can the equipment be used in other activities currently or previously supported by a Federal agency? If so, first preference for other use shall be given to the programs or projects supported by the awarding agency.
- 2) If the equipment is being replaced, the grantee department may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property, subject to the approval of the awarding agency.

When it is determined that the property is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, disposition of the equipment will be made as follows:

- (1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency.
- (2) Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value of proceeds from sale by the awarding agency's share of the equipment.

Disposition of Grant Funded Real Property: When real property is no longer needed for the original authorized purpose, the grantee or subgrantee department shall request disposition instructions from the awarding agency. The instructions will provide for one of the following alternatives:

- (1) Retention of Title.
- (2) Sale of Property.
- (3) Transfer of Title.

The disposal or sale of property or equipment acquired from a Federal or State grant may be prohibited or contain restrictions. In such instances, the using department shall arrange for the transfer of the property to the grant authority or, in the case of a transfer, donation, or sale to another entity, the transferring department shall notify the Property Inventory Agent (Buyer) of any grant related restrictions applying to the equipment. The Property Inventory Agent (Buyer) shall then advise the transferee of any such known grant or other award restrictions prior to the transfer of equipment and removal from Departmental inventory. Such advice to the receiving party shall be made in writing, and a record of the restriction notification maintained with the asset number and/or asset history.

D. File Management, Retention, and Access

Document, Document, Document. If you don't have documentation that substantiates grant activities – it never happened. One of the primary responsibilities of grants management is to maintain accurate, compliant documentation for the financial and programmatic activities of the grant project. This applies to all financial and programmatic records, supporting documents, statistical reports, and other records of the grantee and subgrantees.

(1) File Management

A systematic approach to compiling grant files facilitates the maintenance of accurate, appropriate documentation for the financial and programmatic grant activities and allows for consistent grant management. It is important that the filing system provides for segregation of the major grant functions, and is organized in such a way to be easily used.

All departmental files associated with a grant award must maintain a file structure that includes the following sections:

1. Application (e.g., application/proposal, NOFA/RFA, and Request to Submit)
2. Award (e.g., grant award and agreements, BCC approval staff report, award extensions, sub awards, MOUs and contracts)
3. Financial Management (e.g., budgets and revisions, invoices, financial reports, purchasing orders, draw request with backup documentation)
4. Reports and Evaluation (e.g., evaluation plan and reports to the grant sponsor)

Additional sections may be needed, as applicable, such as Environmental Review, Labor Standards, Procurement, and Contract Management, etc.

Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

Documentation supporting the activities of the grant and backup documentation for grant expenditures must be maintained in a manner and location that ensures costs charged to the grant can be substantiated.

(2) Storage of Grant Files

Due to the importance of storage and retention of adequate supporting documentation for grant related activities extra care must be taken. The grantee department is responsible for maintaining the Grant File and ensuring that active and inactive grant records are stored in a secure location. The storage location must provide appropriate confidentiality and protection from unauthorized inspection, theft, and physical damage. The responsible staff member must use sound judgment in restricting access to grant records, giving consideration to the degree of confidentiality warranted for such records.

Personally Identifiable Information (PII):

Reasonable measures must be taken to safeguard protected personally identifiable information and other information the Federal awarding agency or the County designates as sensitive or the County considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.



Methods for collection, transmission and storage of information:

County departments should, whenever practicable, collect, transmit, and store grant-related information in open and machine readable formats rather than in closed formats or on paper. The County must always provide or accept paper versions of award-related information to and from a sub-recipient upon request. If paper copies are submitted, the County must not require more than an original and two copies. When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided that they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable. 2 CFR §200.335

(3) Length of Retention Period

It is the County policy that all grant records be retained for a minimum of three years from the starting date of the retention period. If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three year period, the records must be retained until completion of the action and resolution of all issues, which arise from it or until the end of the regular three year period, whichever is later.

A Federal awarding agency or pass-through entity in the case of a subrecipient must not impose a retention period longer than three years from the date of submission of the final expenditure report, or for Federal awards that are renewed quarterly or annually, from the date of submission of the quarterly or annual financial report, respectively as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Only in specific situations should records be kept beyond the three year retention period. These exceptions are the following:

- If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- When the County is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
- When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to County.
- Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the County's fiscal year in which the program income is earned.

See 2 *CFR* §200.333

For State or private awards grant sponsors may impose a retention period in excess of three years. Departments must ensure they comply with the retention requirements of each grant award.

Generally the retention period starts on the day the grantee submits its final expenditure report. If an expenditure report has been waived, the retention period starts on the day the report would have been due. When grant support is continued or renewed at annual or other intervals, the retention period for the records of each funding period starts on the day the grantee or subgrantee submits to the awarding agency its single or last expenditure for that period.

All grant documents should be destroyed upon expiration of the retention period; including electronic or digital format records

(4) Disposition of Records

At the end of the appropriate retention period, inactive records, including transaction records, inactive agreements, and other non-permanent records shall be destroyed according to the grant requirements. The disposal process and methods should preserve the confidentiality of documents through the final point of disposition. Records containing personally identifiable information and confidential information must be shredded. Non-confidential paper records may be put into recycling containers.

(5) Access to Records

Records must be easily retrievable for examination by authorized department or County administrators, auditors, and other authorized individuals.

The Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives have the right to access any, documents, papers or other records of grantees and subgrantees, which are pertinent to a Federal grant, in order to make audit, examinations or excerpts, and transcripts. This right of access is not limited to the required retention period, but lasts as long as the records are retained.

VII. GRANT CLOSEOUT

A. Federal Grant Award Closeout

The Federal awarding agency or pass-through entity will close-out the Federal award when it determines that all applicable administrative actions and all required work of the Federal award have been completed by the non-Federal entity. This section specifies the actions the non-Federal entity and Federal awarding agency or pass-through entity must take to complete this process at the end of the period of performance.

- a) The non-Federal entity must submit, no later than 90 calendar days after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the Federal award. The Federal awarding agency or pass-through entity may approve extensions when requested by the non-Federal entity.
- b) Unless the Federal awarding agency or pass-through entity authorizes an extension, a non-Federal entity must liquidate all obligations incurred under the Federal award not later than 90 calendar days after the end date of the period of performance as specified in the terms and conditions of the Federal award.
- c) The Federal awarding agency or pass-through entity must make prompt payments to the non-Federal entity for allowable reimbursable costs under the Federal award being closed out.

- d) The non-Federal entity must promptly refund any balances of unobligated cash that the Federal awarding agency or pass-through entity paid in advance or paid and that are not authorized to be retained by the non-Federal entity for use in other projects. See OMB Circular A-129 and see 2 CFR §200.345 Collection of Amounts Due, for requirements regarding unreturned amounts that become delinquent debts.
- e) Consistent with the terms and conditions of the Federal award, the Federal awarding agency or pass-through entity must make a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received.
- f) The non-Federal entity must account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with 2 CFR §200.310 Insurance Coverage through 200.316 Property Trust Relationship and 200.329 Reporting on Real Property.
- g) The Federal awarding agency or pass-through entity should complete all closeout actions for Federal awards no later than one year after receipt and acceptance of all required final reports. See 2 CFR §200.343 Closeout.

B. *Grant Expiration or Termination Reconciliation and Reporting*

After the expiration or termination of the grant, the grantee must submit to the funder all financial performance and other reports required as a condition of the grant.

The first step after the expiration of a grant is the reconciliation to the general ledger. The Comptroller's Office recommends that this be done within 30 days following the end of the grant term. All expenditures to the grant should be reviewed for allowable purposes and for appropriate documentation. Any non-allowable expenditure must be moved from the grant internal order via journal entry. Once the expenditures are confirmed, a final billing is posted to the grant internal order to cover all allowable expenses. A grant close-out form can be found on the internal web site under: Comptroller's Office /Accounting/Accounting Forms. This form, along with supporting documentation, can be e-mailed to Comptrollers – Accountant. The internal order can be "locked" on request to prevent further postings.

C. Final Reporting

Within 60 to 90 days of grant expiration or termination, as specified by the granting agency, the grantee must submit all financial, performance, and other required reports, as a condition of the grant. Some agencies may, upon request of the grantee, extend the time frame. However, since an extension of this reporting term will frequently also extend the time frame for reimbursement, putting cash and earnings pressures on the fund, it should not be requested unless necessary. Some of the reports required may include, but are not limited to:

1. Final performance or progress reports
2. Financial status reports
3. Final request for payment
4. Federal property report

D. Beyond Grant Closeout

The closeout of a grant does not affect:

- The awarding agency's right to disallow costs and recover funds on the basis of a later audit or other review;
- The County's obligation to return any funds due as a result of later refunds, corrections, or other transactions;
- Record retention requirements;
- Property management requirements; and
- Audit requirements.

VII. DEFINITIONS

Advance Payment: A payment made to a grantee upon its request either before outlays are made by the grantee or through the use of predetermined payment schedules.

Allocable Cost: A cost that can be assigned to a project that meets a specific project objective based on relative benefits received. A cost may be allocable to a specific project, but paid for by the County depending on what the sponsor determines is allowable for a particular grant.

Allowable Cost: A cost that can be charged to a project per sponsor's guidelines. A cost may be allowable per sponsor's guidelines, but if it does not meet any specific project objectives, it is not allocable.

Approved Grant Budget: The Approved Budget is the financial expenditure plan, including any revisions approved by the awarding office for the grant-supported project or activity. For Federal grants, the approved budget consists of Federal (grant) funds and non-Federal participation, or Federal funds only, and will be specified on the Notice of Grant Award and on any subsequent revised or amended award notice.

Block Grant: A Block Grant is a type of mandatory grant in which the recipients (normally States or their subdivisions) have substantial authority over the type of activities to support, with minimal Federal administrative restrictions. The basic premise is that Block Grant recipients should be free to target resources and design administrative mechanisms to provide services to meet the needs of their citizens.

Cage Code: A five-character code which identifies companies or organizations doing or planning to do business with the Federal government and is assigned through the System for Award Management (SAM).

Carry Forward: Unexpended funds carried from one budget period to another.

Cash Cost Share: Cash cost share is outlays of funds to support the total project through acquiring material, buying equipment, paying labor (including fringe benefits and direct overhead associated with that labor), and other cash outlays required to perform the statement of work.

Certifications: Certifications is a section of the grant application that sets forth certain requirements concerning debarment and suspension, drug-free workplace requirements, lobbying, the Program Fraud Civil Remedies Act, and environmental tobacco smoke with which an organization must comply, if a grant is awarded.

CFDA Number: The CFDA (Catalog of Federal Domestic Assistance) number is a unique identifier for a particular Federal grant. The CFDA is the encyclopedia of all funding programs and the way that all grants are cataloged.

Cooperative Agreement: A Cooperative Agreement is a financial assistance mechanism used in lieu of a grant when substantial Federal programmatic involvement with the recipient during performance is anticipated by the awarding agency. A substantial involvement means that the recipient can expect Federal programmatic collaboration or participation in managing the project.

Disallowed Costs: Charges to an award that the awarding agency determines to be unallowable, in accordance with the applicable Federal cost principles or other terms and conditions contained in the award.

Discretionary Grant: A grant (or cooperative agreement) for which the Federal awarding agency generally may select the recipient from among all eligible recipients, may decide to make or not make an award based on the programmatic, technical, or scientific content of an application, and can decide the amount of funding to be awarded.

DUNS Number: The Dun and Bradstreet Data Universal Numbering System number is composed of a unique nine-digit number provided to the applicant to serve as identification. This is a requirement for Federal grant applications. The D-U-N-S® Number is widely used by both commercial and federal entities and was adopted as the standard business identifier for federal electronic commerce in October 1994. The D-U-N-S Number® was also incorporated into the Federal Acquisition Regulation (FAR) in April 1998 as the Federal Government's contractor identification code for all procurement-related activities.

Expiration Date: The expiration date is the date signifying the end of the current budget period, as indicated on the Notice of Grant Award, after which the grantee does not have authority to obligate grant funds.

Federal Financial Assistance: Federal Financial Assistance is the transfer of money, property, or other direct assistance to an eligible recipient to support or stimulate a public purpose authorized by statute.

Fixed Amount Awards: A type of grant agreement under which the Federal awarding agency or pass-through entity provides a specific level of support without regard to actual costs incurred under the Federal award. This type of Federal award reduces some of the administrative burden and record-keeping requirements for both the non-Federal entity and Federal awarding agency or pass-through entity. Accountability is based primarily on performance and results. See 2 CFR §200.201 Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts, paragraph (b) and 200.332 Fixed amount subawards.

Formula Grant: Formula Grants are allocations of money to states or their subdivisions in accordance with the distribution formulas prescribed by administrative regulation, for activities of a continuing nature not confined to a specific project. The formula is often based on population, crime statistics, or previous years' services provided.

Grant: A grant is a financial assistance mechanism whereby money or other items of value is provided to carry out approved activities. A grant can be classified on the basis of type of activity supported; degree of discretion allowed the awarding office (mandatory or discretionary award); and/or the method of determining amounts of award (negotiated basis or formula).

Grantee: The grantee is the organizational entity or individual to which a grant (or cooperative agreement) is awarded and which is responsible and accountable both for the use of the funds provided and for the performance of the grant supported project or activities.

Grant Award: An award is financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money, or property in lieu of money, by the Sponsor to an eligible recipient. The term generally does not include technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; and contracts that are required to be entered under procurement laws and regulations.

Grant Equipment: An article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost, which equals or exceeds \$5,000.

Indirect Cost: Those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools must be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived. Indirect Cost is an accounting term used to assign or charge costs that are common to two or more of a grantee's projects or operations. Usually, this includes the cost of building occupancy, equipment usage, procurement, personnel administration, accounting, and other overhead activities that are charged to grants and contracts proportionately. It is imperative that grantees remain consistent in declaring costs as either direct or indirect for all projects and activities of the organization, regardless of the source of funding.

In-Kind Costs: In-kind cost share is defined as the reasonable value of equipment, materials or other property used in the performance of the statement of work. In-kind contributions are sometimes hard to value (such as space, use of equipment, and intellectual property). The in-kind value of equipment (including software) cannot exceed its fair market value and must be prorated according to the share of its total use dedicated to carrying out the project. The in-kind value of space (including land or buildings) cannot exceed its fair rental value and must be prorated according to the share of its total use dedicated to carrying out the project.

Institutional Review Board (IRB): The IRB is an administrative body established to protect the rights and welfare of human research subjects recruited to participate in research activities conducted under the auspices of the institution with which it is affiliated. The IRB has the authority to approve, require modifications in, or disapprove all research activities that fall within its jurisdiction. More information on IRBs can be obtained from the Office for Human Research Protections website.

Logic Model: A program Logic Model is a systemic, visual way to present a planned program with its underlying assumptions and theoretical framework. It is a picture of why and how the program will work and causes the author to describe, share, discuss, and improve program theory as the program is developed.

Maintenance of Effort (MOE): MOE is a requirement contained in certain legislation, regulations, or administrative policies that a grantee must maintain a specified level of financial effort in the area for which Federal funds will be provided in order to receive Federal grant funds. This requirement is usually given in terms of a previous base-year dollar amount.

Matching Funds: The portion of project or program costs not borne by the Sponsor. Sponsors regularly require that the grantee share a portion of the grant program costs; usually allowing either cash match or in-kind match. Matching Funds include the value of grantee and third-party cash and in-kind contributions. Costs used to satisfy matching requirements are subject to the same policies governing allowability as other costs under the approved budget.

Modified Total Direct Cost (MTDC): All direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and sub awards and subcontracts up to the first \$25,000 of each subaward or subcontract. MTDC excludes equipment, capital expenditures, and charges for patient car rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward and subcontract that exceeds \$25,000.

Monitoring: Monitoring is a process whereby the programmatic and business management performance aspects of a grant are reviewed by accessing information gathered from various reports, audits, site visits, and other sources.

New Application: A new application is a request for financial or direct assistance for a project/program not currently receiving financial assistance.

No Cost Extension: A no cost extension is a formal extension of the grant period to allow the grantee additional time to complete grant-funded activities at no additional cost to the Sponsor (sponsor does not provide additional money).

Noncompeting Continuation Application: A noncompeting continuation application is a request for continued financial or direct assistance for a subsequent budget period within a previously approved project period.

Non-profit Organization: A Non-profit Organization is any organization, including a faith-based organization or community development corporation, exempt (and documented as exempt by the IRS) from taxation by reason of paragraph (3) or (4) of section 501 (c) of the Internal Revenue Code of 1986.

Notice of Funding Availability (NOFAs): NOFAs are announcements that appear in the *Federal Register*, printed each business day by the U.S. Government, inviting applications for Federal grant programs. NOFAs generally include information on eligibility, funding areas, amount of funding, deadline for submission of applications, and contact information.

Notice of Grant Award: The Notice of Grant Award is a legally binding document that notifies the grantee and others that a grant or cooperative agreement has been made, refers to all terms of the award and contains or references all terms of the award and it documents the obligation of Federal funds.

Outcome: Outcomes are benefits or changes for individuals or populations during or after participation in program activities. Outcomes may relate to behavior, skills, knowledge, attitudes, values, conditions or other attributes. Outcomes are what participants know, think, or can do; how they behave, or what their conditions are that is different following program implementation.

Outcome Evaluation: An outcome evaluation is a form of evaluation that assesses the extent to which a program's outcome oriented objectives are achieved. It focuses on outputs and outcomes, including unintended effects, to determine the program's effectiveness but may also assess the program process to evaluate how outcomes are produced. An outcome evaluation will determine the net effects of the interventions applied in the program and will produce and interpret findings related to whether the interventions produced desirable changes and their potential for replicability.

Outputs: Outputs are program activities and their direct products. Usually outputs are measured in terms of the volume of work accomplished. Outputs have little inherent value in themselves, however they are important, because they are intended to lead to a desired benefit for participants or target populations.

Personally Identifiable Information (PII): PII means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public Web sites, and university listings. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual

Period of Performance: The time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. The Federal awarding agency or pass-through entity must include start and end dates of the period of performance in the Federal award (see 2 CFR §200.210 Information contained in a Federal award paragraph (a)(5) and 200.331 Requirements for pass-through entities, paragraph (a)(1)(iv)).

Pre-Application: A pre-application is a summary statement of the intent of the applicant to request funds. It is often used to predetermine the applicant's eligibility, determine how well the proposed project can compete with similar applications, and eliminate any proposals that have little or no chance of funding. Pre-applications are often required by the grantor agency to prepare for the grant review process.

Pre-Award Costs: Costs incurred prior to the effective date of an award or budget period. Such costs are allowable only to the extent that they would have been allowable, if incurred after the date of the award and only with the written approval of the awarding agency.

Prior Approval: Written approval by an authorized awarding agency official evidencing prior consent. Prior approval is required for various grant activities such as: changes in key personnel, significant budget revisions, disposition of equipment, and pre-award costs.

Private Foundation: A nongovernmental, nonprofit organization with funds (usually from a single source, such as an individual, family, or corporation) and program managed by its own trustees or directors. Private foundations are established to maintain or aid social, educational, religious, or other charitable activities serving the common welfare, primarily through the making of grants.

Process Evaluation: Process Evaluation assesses the extent to which a program is operating as it was intended. It typically assesses the program activities' conformance to statutory and regulatory requirements, program design, professional standards and customer expectations. A process evaluation is an ongoing examination of the implementation of the program. It focuses on the effectiveness and efficiency of the program's activities and interventions. It should answer questions such as: Who is receiving what services and are the services being delivered as planned? It is also known as a formative evaluation, because it gathers information that can be used as a management tool to improve the way a program operates while the program is in progress. It should also identify problems that occurred and how they were dealt with and recommend improved means of future implementation.

Program: A program may be an activity, project, function, or policy that has an identifiable purpose or set of objectives. A program may also be defined as a series of activities designed to collectively hasten development and testing, consideration, and adoption of technologies and practices toward improving social, economic, and environmental conditions. These activities adapt, systematize, and transfer information to program participants and also provide them with non-formal education. Program participants include end users of targeted practices and technologies, as well as intermediate users that support and influence those who are end users.

Program Announcement (PA): The PA is an awarding agency's formal published announcement of the availability of funding through one of its assistance programs. The announcement invites applications and provides information such as eligibility and evaluation criteria, funding preferences and priorities, procedures for obtaining application kits, and submission deadlines. The difference between PAs and RFAs is that PAs have recurring receipt dates. Both are referred to as grant announcements.

Program Evaluation: Program evaluation consists of individual systematic studies conducted periodically or on an ad hoc basis to assess how well a program is working. They are often conducted by experts external to the program, inside or outside the organization, as well as by program managers. Whether the evaluation is conducted internally, externally, or by the program manager is often dictated by the grantor agency.

Program Income: Program income is the gross income generated by grant-supported activity. The common rule for State and local government grant administration defines program income as income earned during the grant period.

Program Participant: Those recipients participating in grant-funded activities and receiving benefits from services provided by the grant program.

Program Planning and Development: Program Planning and Development consists of all activities required to assess needs and identify strengths, weaknesses, opportunities and threats (SWOT Analysis) through collaboration with program partners, proposed participants, and stakeholders. Partners, participants, and stakeholders then formulate a strategy, preferably using best practices, to address the identified need. This encompasses setting objectives or targets for program accomplishment, selecting the program content, methods of service or product delivery, establishing baseline data through assessment in order to evaluate program success, and identifying the roles of each partner, participant, and stakeholder.

Project Director: The Project Director is the individual designated by the recipient to direct the project or program being supported by a grant. He or she is responsible and accountable to officials of the recipient organization for the proper conduct of the project. The organization is, in turn, responsible and accountable to the funding agency for the performance and financial aspects of the grant-supported activity.

Public Benefits: Public benefits flow beyond individual participants and provide economic, social and environmental benefits to a community or society.

Quantitative Objectives: Quantitative Objectives, often referred to as Targets, are measurable conditions to be reached in a defined period of time.

Recipient: The Recipient is the grantee, or where subgrants are authorized by law, the subgrantee that receives financial assistance in the form of grants or cooperative agreements or the recipient of goods or services provided with grant funds.

Replicability: Replicability, or the ability to duplicate a program, is often a requirement of demonstration grants. Sponsors want to know if the project or program can be replicated at other locations.

Request for Applications (RFA): The RFA is a grant announcement that contains all the instructions and information needed to prepare a grant application. It describes the intent and goals of the program; provides special requirements, applicable policies, and procedures; and includes complete guidance for preparing and submitting an application.

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 except when it elects to have a program-specific audit conducted in accordance with the Uniform Grant Guidance Subpart F.

Stakeholder: A Stakeholder is any person, inside or outside the organization that has a real and active interest in the organization and its programs; who has an investment (time, energy, emotional, or money) in the program; and who has a commitment to the program's success.

Stipend: A stipend is a payment made to an individual under a fellowship or training grant in accordance with pre-established levels to provide for the individual's living expenses during the period of training.

Subaward/Subgrant: An award of financial assistance in the form of money, or property in lieu of money, made under an award by a recipient to an eligible subrecipient or by a subrecipient to a lower tier subrecipient. The term includes financial assistance when provided by any legal agreement, even if the agreement is called a contract, but does not include procurement of goods and services nor does it include any form of assistance which is excluded from the definition of award.

Subrecipient: The legal entity to which a sub award is made and which is accountable to the recipient for the use of the funds provided.

Substantive Programmatic Work: Substantive programmatic work is the primary project activities for which grant support is provided and/or a significant portion of the activities to be conducted under the grant.

Supplemental Application: A supplemental application is a request for an increase in support during a current budget period for expansion of the project's scope or research protocol or to meet increased administrative costs unforeseen at the time of the new, noncompeting continuation, or competing continuation application.

Suspension: Temporary withdrawal (or Suspension) of the grantee's authority to obligate grant funds pending corrective action by the grantee. A post-award action by the awarding agency that temporarily withdraws the agency's financial assistance sponsorship under an award, pending corrective action by the recipient or pending a decision to terminate the award.

Sustainability: To sustain means to hold up, keep in existence, to supply with necessities, to support from below, to encourage, and affirm validity. Stakeholders develop alliances at the local, state, regional and national levels to maximize the chances of sustaining the effects of successful programs over time. Alliances that support leadership development, technical assistance, and funding are especially important. Systems are put in place to establish early, ongoing efforts to identify alternative funding sources and leverage support. Effective sustainability strategies encourage community engagement around issues that are priorities.

System for Award Management (SAM): A Federal Government owned and operated free web site that consolidates the capabilities in Central Contractor Registry (CCR), Federal Agency Registration (FedReg) Online Representation and Certifications Application (ORCA), and Excluded Parties List System (EPLS). Future phases of SAM will add the capabilities of other systems used in Federal procurement and awards processes.

Termination: Termination, in grant terms, is the permanent withdrawal of the grantee's authority to obligate previously awarded funds before that authority would otherwise expire, including voluntary relinquishment of that authority by the grantee.

Terms of Award: For Federal grant programs, the Terms of Award are all the legal requirements imposed on a grant by the Federal government, whether by statute, regulation, or terms in the grant award document. Each Notice of Grant Award may include both standard and special provisions that are considered necessary to attain the objectives of the grant, facilitate post-award administration of the grant, conserve grant funds, or otherwise protect the Federal government's interests.

Third Party: A Third Party is any individual, organization, or business entity that is not the direct recipient of grant funds.

Third Party Agreement: A Third Party Agreement is a written agreement entered into by the grantee and an organization, individual or business entity, by which the grantee makes an equity investment in support of grant purposes.

Third Party In-kind Contributions: Third party in-kind contributions are the value of non-cash contributions provided by non-Federal third parties who may be in the form of real property, equipment, supplies and/or other expendable property, and the value of goods and services directly benefiting and specifically identifiable to the project or program.

Total Project Costs: Total project costs are the total allowable costs incurred by the grantee to carry out an approved grant supported project or program, including direct, indirect, and matching funds. For Federal programs, this amount will be listed in the grant application, Notice of Grant Award, and included on the Financial Status Report.

The Washoe County Grant Management Policy Manual was originally approved by the Board of County Commissioners (BCC) on May 15, 2012. The 2013 updated version was approved by the BCC on July 23, 2013, and the 2016 version was approved by the BCC on January 26, 2016.

APPENDICES



WASHOE COUNTY

"Dedicated To Excellence in Public Service"

www.co.washoe.nv.us

APPENDIX A
STAFF REPORT
BOARD MEETING DATE:

CM/ACM _____
Finance _____
DA _____
Risk Mgt. _____
HR _____
Grant Mgt. _____

DATE:

TO: Board of County Commissioners

FROM:

THROUGH:

SUBJECT: Recommendation to approve

Each of the following items should be included in the subject line:

- *Funding Program Name*
- *Awarding Agency*
- *Award Amount*
- *Match Amount*
- *Grant Term - Any award submitted for approval after the effective date, must identify the term as "retroactive from"*
- *Direct the Comptroller's Office to make the necessary budget amendments*
- *Commission Districts impacted*

Please use the standard paragraph format.

SUMMARY

If the award is approved retroactively, a summary statement must be included identifying the reason for retroactive approval.

County Priority/Goal supported by this item:

PREVIOUS ACTION

BACKGROUND

AGENDA ITEM # _____

GRANT AWARD SUMMARY

Project/Program Name: *Name of the Washoe County grant program/project.*

Scope of the Project: *Provide a brief summary of the project scope.*

Benefit to Washoe County Residents: *Provide a brief statement identifying the project's benefit.*

On-Going Program Support: *Identify if the grant award will be used to support the costs of on-going programs. If so, describe how the program will be funded once the grant is complete.*

Award Amount: *Amount of the award identified on the award documents*

Grant Period: *Start date and end date on the award documents*

Funding Source: *Original sponsor entity/grantor of the funds*

Pass Through Entity: *Pass through entity awarding funds to the County (if applicable)*

CFDA Number: *Code of Federal Domestic Assistance number*

Grant ID Number: *Federal or State Grant ID number on award documents*

Match Amount and Type: *Identify the total amount of matching funds, and briefly describe the matching contribution.*

Sub-Awards and Contracts: *If applicable identify any sub-awards or contracts anticipated as a component of this grant award. If known include the name of the sub-recipient(s) or contractor(s), amount of the award(s); and result of preaward risk assessment and management supports for High Risk grantees; if unknown include a brief summary of the process for awarding the sub-grants and/or contracts.*

FISCAL IMPACT

Should the board accept this grant award and approve these amendments, the adopted budget will be increased by \$XX,XXX in both revenues and expenditures in the following accounts:

Use of the table format is optional:

| Cost Object | G/L Account | Amount |
|-------------|-------------|--------|
| | | |
| | | |
| | | |
| | | |

Each of the following items should be included in the Fiscal Impact.

- *Include grant internal order number, account number, and amount (revenue must equal expenses).*
- *Identify if a budget amendment is required and if so define the budget amendment needed: including cost object, account number, and amount.*
 - *If award amount was estimated in County approved budget, indicate budgeted amount and adjustment need to equal the grant award amount.*
 - *If award is less than budgeted, indicate if there are any impacts on FTE/Personnel, and actions needed.*
- *Identify match amount if any, and cost object and account number within current adopted budget where match will be charged.*
 - *Identify if grant funds will be drawn as an advance or reimbursement*
 - *If reimbursement, identify the source of the upfront cash.*
- *Are indirect costs included in the grant budget?*
- *How much indirect cost does the department expect to collect?*
\$ _____

RECOMMENDATION

It is recommended that the Board of County Commissioners.....

POSSIBLE MOTION

Should the Board agree with staff's recommendation, a possible motion would be:
"move...

When awards are submitted for Agenda review the following items must be attached:

1. *Award Documents*

For Subgrants to other agencies attach:

1. *Subrecipient Agreement checklist*
2. *Subrecipient Agreement*
3. *Subrecipient Risk Assessment*
4. *Subrecipient Resolution*
5. *SAM Debarment Status Check*



Appendix B

WASHOE COUNTY GENERAL PRINCIPLES FOR DETERMINING ALLOWABLE COSTS

This document is provided to assist county staff as a guide in determining what grant costs are considered **allowable** and **unallowable** based on the Federal Cost Principles and County policy. Only those costs that are allowable under the award can be charged to the grant (as direct or indirect), or considered as cost sharing or matching. The factors affecting the allowability of costs are unique to each Federal program and are found in the laws, regulations, and the provisions of the contract or grant agreements pertaining to the program.

Basic Guidelines

To be allowable under Federal awards costs must meet the following:

1. **Necessary** and **reasonable** for the proper and efficient performance and administration of the Federal award,
2. **Allocable** to the award,
3. Authorized or not prohibited under State or local laws and regulations,
4. Allowable under the grant program guidelines, and terms and conditions of the Federal award (and pass-through award),
5. Treated consistently when applied to both Federal and non-Federal activities of the county,
6. Adequately documented.

To determine the allowability of **Selected Items of Cost** county staff should use:

1. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Office of Management and Budget. Title 2, Subpart A, Chapter II, Part 200. Subpart E. Cost Principles.
2. Federal Agency regulations, grant program guidelines, and terms and conditions of the Federal award (and as applicable the pass-through award) to identify unallowable items of cost.

Under recovery of Costs

Any excess costs over the grant award amount under one award are unallowable under other grant awards.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Appendix C

Objective: There are procedures in place for identifying federal, state, and other awards.

GR - 1.1.

Risk: Grants will be incorrectly classified. Schedule of Expenditures of Federal Awards (SEFA) will not include all federal awards. Potential noncompliance with legal, contractual and regulatory provisions.

Control ID: All grants are required to be accepted by the Board of County Commissioners (BCC). All grants require an internal order for recording financial data. All internal orders are created by the Grants Accountant or Comptroller's Office management from the department's request to establish document. Comptroller's Office accountants review BCC agenda items and follow up with departments if an IO request is not received. Grant documents or award letters are required for the creation of an internal order. Documentation is reviewed to determine the funding source (identification), CFDA number, amount awarded and grants ID as appropriate, for entry into reporting fields on the internal order. All set ups are reviewed by someone other than the person who did the set up. Accountants upload budget as appropriate (documented on the agenda staff report) and that has been approved by the BCC.

GR - 1.1.1.

Objective: There are accounting procedures, charts of accounts, etc., for identifying and recording receipts and expenditures of program funds separately and in the appropriate cost category for each award or grant.

GR - 1.2.

Risk: Grants will be incorrectly classified. SEFA will not include all federal awards. Potential for noncompliance with legal, regulatory and contractual requirements. Errors could be made and not timely identified and corrected.

Control ID: All grants require an internal order for recording financial data. There are separate accounts for federal and state grant revenue. Internal orders generally include both revenue and expenditures for that program.

GR - 1.2.1.

Objective: Written notification is provided to employees when grant provisions or regulations impose requirements that differ from the government's normal policies and procedures.

GR - 1.3.

Risk: Potential for noncompliance with legal, regulatory and contractual requirements. Errors could be made and not timely identified and corrected.

Control ID: County Grants Administrator prepares and updates the official grant manual, which establishes standards for applying, reporting and managing grants. Department Grant Coordinators are responsible for reading and understanding grant provisions including reporting requirements. County Grants Administrator and the Grants Accountant in the Comptroller's Office review email and other sources regarding grant updates and/or changes as well as changes to the Uniform Guidance and distribute information to appropriate departments, as needed. In addition, periodic grants committee meetings are held where updates and information are transmitted and discussions take place. Additional grant education is provided when practical and/or needed.

GR - 1.3.1.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Objective: Time schedules for filing financial reports with grantors are documented and policies are in place for identifying special requirements of grants.
GR - 1.4.

Risk: Grants will be incorrectly classified. SEFA will not include all federal awards. Potential for noncompliance with legal, regulatory and contractual requirements. Errors could be made and not timely identified and corrected.

Control ID: Department Grant Coordinators are responsible for reading and understanding grant provisions including reporting requirements. Grant start and end date fields are available in the SAP system. This allows the Grants Accountant and County Grants Administrator (as well as other users) to review data and correspond timely with departments on grants near closing dates or after grants have ended. Schedules of report due dates are kept by Department Grant Coordinators and reviewed to ensure timely report submission. **Reports are reviewed by supervisors prior to submission.**
GR - 1.4.1.

Objective: Procedures are in place, including cash requirement projections, minimizing the time between the transfer of funds from the governmental grantor agency or primary recipient and disbursement.
GR - 1.5.

Risk: For advance grants the County could risk being in noncompliance with cash management requirements under the Single Audit. For reimbursement type grants the County could risk not being able to provide non-grant funded services if grants are not billed and cash is not received timely.

Control ID: The County's grants are typically on a reimbursement basis. If and when the County has advance grants, the Department Grant Coordinator calculates an estimate of the interest that could be earned on the advance, and if that amount exceeds \$500 per year, a yearly calculation is computed on the interest earned and is forwarded to the appropriate federal agency in accordance with the requirements of the Single Audit. Accountants in the Comptroller's Office perform fund reviews periodically. For funds with grants, cash and grant receivables are monitored for trends and the analysis is sent to department management as appropriate. Cash-flow projections are prepared where required on a case-by-case basis.
GR - 1.5.1.

Objective: Grant funds are accounted for separately and can be easily tracked and identified.
GR - 1.6.

Risk: Costs associated with specific grants could not be isolated and errors in reporting grant revenues and expenditures could exist. Compliance with grant requirements could not be adequately monitored and errors and noncompliance could exist.

Control ID: All grants require a unique internal order for recording financial data in SAP. Grant revenue and program income is recorded in the internal order in unique general ledger accounts. Grant internal orders are set up in SAP by the Grant Accountant and reviewed by Comptroller's Office management. Departments submit requests that include the grant information, grant documents and award letter. Reports by internal order number containing grant information can be run in SAP. If interest earnings are restricted for the grant, a separate cash fund in the general ledger with pooled cash earnings allocations is established and reviewed by Comptroller's Office management.
GR - 1.6.1.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Objective: Controls are established to preclude charging federal award programs with unallowable costs and expenditures.
GR - 1.7.

Risk: Costs will be disallowed by the grantor. Granting agencies may be billed for unallowed costs.

Control ID: Department Grant Coordinators are knowledgeable regarding allowable cost requirements and other restrictions on their respective grant awards. Purchase requisitions are approved by Department Grant Coordinators via workflow and are tied to the grant internal order and have an appropriate account number in SAP prior to a purchase order being issued. Expenditures are reviewed for allowability by Department Grant Coordinators prior to billing the grantor for reimbursement. The County's Accounts Payable department audits all claims prior to payment for reasonableness and questions unusual expenditure amounts. They may consult with the Grant Accountant in the Comptroller's Office whether particular expenditures are allowable under the grant. If further clarification is required, the County Grant Accountant follows-up with the department. Any determination made is documented and attached to the invoice in question for filing and audit support. The Purchasing Department is aware of special federal requirements, for instance, if debarment tests are performed.
GR - 1.7.1.

Objective: Procedures are in place for tracking property and equipment purchased with federal award funds.
GR - 1.8.

Risk: Washoe County could be out of compliance with equipment management requirements for federal awards.

Control ID: The federal percentage and the CFDA number are recorded during the manual asset creation in SAP by the accountant in the Comptroller's Office responsible for capital assets. A checklist is used by the fund accountant for the required fields to be setup. A review process is in place to ensure accurate entry. The physical inventory system also records the grant funding source information for tracking equipment that may not be capitalizable. Departments are responsible for entering grant equipment data into SAP.
GR - 1.8.1.

Objective: Awards or grants with matching requirements, levels of effort, and earmarking limitations, are monitored to ensure that requirements and limitations are met and amounts claimed or used for matching are determined in accordance with applicable laws and regulations (i.e., Uniform Guidance).
GR - 1.9.

Risk: Washoe County could be out of compliance with matching requirements.

Control ID: Responsible department management reviews reports prior to submission to the awarding agency including matching funds reported.
GR - 1.9.1.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Objective: Compliance with state and federal grant requirements in relation to personnel, salary and benefits.
GR - 1.10. Personnel policies covering job descriptions, hiring procedures, salary or wage levels, promotions, dismissals, and conflicts of interest are documented.

Risk: Potential for noncompliance with grant provisions and Single Audit and other state or federal regulations resulting in audit findings and potential loss of grant revenue.

Control ID: Personnel policies exist covering job descriptions, hiring procedures, salary or wage levels,
GR - 1.10.1. promotions, dismissals, and conflicts of interest and are documented in Washoe County Code Chapter 5. Additional documentation is available on the Human Resources department website and in the agreements between the County and various employee associations.

Objective: Procedures are in place to provide reasonable assurance that consistent treatment is applied to all awards or grants in the distribution of charges, direct or indirect.
GR - 1.11.

Risk: The County could be out of compliance with cost principle requirements. Granting agencies may be billed for unallowed costs.

Control ID: Direct costs are charged to grants at the time expenditures are made, either through the purchasing /
GR - 1.11.1. accounts payable process or through the payroll process. Each grant is assigned its own internal order for capturing direct costs associated with the grants. Indirect costs are allocated only to those grants that allow indirect charges. Social Services/CPS, Health and the District Attorney's Office have department specific Cost Allocation Plans that have been reviewed at both the state and federal level and those departments charge indirect costs based on those plans. Other departments that do not have department specific cost allocation plans, use the County-wide Shared Costs Plan that has been prepared in accordance with the provisions of Uniform Guidance. The rate that will be applied is approved by the grantor at the time the grant is awarded.

Objective: The appropriate level of management or another appropriate person reviews reports prepared by internal or external auditors for awards or grants.
GR - 1.12.

Risk: Management and those charged with governance may be unaware of noncompliance with legal, regulatory or contractual requirements. Implementation of preventative procedures would not be addressed and grant funding could be jeopardized.

Control ID: Audit results from internal and independent auditors are communicated to the department
GR - 1.12.1. management, Department Grant Coordinators, and others as appropriate. Audit findings are discussed with program management and the Comptroller's Office during the Single Audit. Audit results from audits conducted by state and federal agencies are communicated to department management.

Washoe County Internal Controls - Overview - FY 2015-2016
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GR - Grants

Objective: Reconciliations of grant financial reports with supporting accounting records are prepared, reviewed, and approved by responsible official before filing.
GR - 1.13.

Risk: Reports submitted may be inaccurate and not reconciled with accounting system. Potential noncompliance with legal, regulatory and contractual requirements. Misstatements could occur in the financial statements. Grant funding could be jeopardized.

Control ID: Grant financial reports are reconciled to SAP and reviewed by program management prior to timely submission to the granting agency.
GR - 1.13.1.

Objective: Financial reports are prepared for required accounting periods within the time imposed and on the basis of accounting required by the grantor agencies.
GR - 1.14.

Risk: Reports submitted may be inaccurate and not reconciled with the accounting system. Potential noncompliance with legal, regulatory and contractual requirements. Misstatements could occur in the financial statements. Grant funding could be jeopardized.

Control ID: Grant financial reports are reconciled to SAP general ledger by department staff and reviewed by program management prior to timely submission to granting agency.
GR - 1.14.1.

Objective: Financial reports and claims for advances and reimbursements agree with the supporting financial record and general ledger.
GR - 1.15.

Risk: Reports submitted may be inaccurate and not reconciled with accounting system. Potential noncompliance with legal, regulatory and contractual requirements. Misstatements could occur in the financial statements. Grant funding could be jeopardized.

Control ID: Grant financial reports including claims for advances and reimbursements are reconciled to SAP general ledger by department staff and reviewed by program management prior to timely submission to granting agency.
GR - 1.15.1.

Objective: A responsible official approves requests for advances or reimbursement.
GR - 1.16.

Risk: Reports submitted may be inaccurate and not reconciled with accounting system. Potential noncompliance with legal, regulatory and contractual requirements. Misstatements could occur in the financial statements. Grant funding could be jeopardized.

Control ID: Requests for advances or reimbursements are prepared by Department Grant Coordinators, reviewed and approved program management prior to timely submission to the granting agency.
GR - 1.16.1.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Objective: Estimates of allowable program costs and estimated timing of payments are carefully calculated
GR - 1.17. reducing exposure to potential violations.

Risk: If funds are received in advance based on estimated payment of costs, the County may be in violation of federal cash management requirements.

Control ID: All grant funds received in advance are reserved in fund balance for that program. Any required
GR - 1.17.1. matching funds must be identified in the existing budget before the BCC accepts the award. Advance federal grants are managed by the department receiving the funds and periodically monitored by the grant accountant in the Comptroller's Office for cash management requirements.

Objective: A formal approval process exists for activities generating program income.
GR - 1.18.

Risk: Program income may be improperly classified and not reported on the SEFA, as required. Potential noncompliance with legal, regulatory and contractual requirements.

Control ID: The BCC approves all grants including those that will be generating program income. The Grant
GR - 1.18.1. Accountant in the Comptroller's Office reviews grant documents for possible program income and communicates with Department Grant Coordinators and program personnel in the departments to determine the appropriate classification.

Objective: A responsible member of management reviews costs charged to direct and indirect cost centers in
GR - 1.19. accordance with applicable grant agreements and applicable cost principle sections in the Uniform Guidance.

Risk: Granting agencies may be billed for unallowed costs. Potential noncompliance with legal, regulatory and contractual requirements.

Control ID: Department Grant Coordinators are knowledgeable regarding allowable costs and review expenditures
GR - 1.19.1. prior to submitting requests for reimbursements. Requests for reimbursements and supporting documentation are reviewed by program management prior to submission to granting agency. Managers and supervisors responsible for cost centers related to internal orders approve all purchases prior to the expenditures posting to the grant internal orders via workflow in SAP. Employees charged to grants on a full-time basis are coded to the grant through position control in SAP. Employees working on grants on an intermittent basis, code their time to the grant on their time entry and their supervisors approve the time and account coding before releasing to payroll for processing. Appropriate and accurate timekeeping is a topic at grant committee meetings and trainings.

Washoe County Internal Controls - Overview - FY 2015-2016
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GR - Grants

Objective: If services are provided under award programs with eligibility requirements, a responsible member of management uses a set checklist to review and approve the provision of services to ensure that recipients are eligible under specific program requirements.
GR - 1.20.

Risk: Granting agencies may be billed for unallowable costs. Potential noncompliance with legal, regulatory and contractual requirements.

Control ID: Department Grant Coordinators are knowledgeable of eligibility requirements and only eligible clients receive services under grant programs.
GR - 1.20.1.

Objective: The depreciation policies or methods of computing use allowances are in accordance with the standards outlined in federal circulars or agency regulations.
GR - 1.21.

Risk: Granting agencies may be billed for unallowable costs. Potential noncompliance with legal, regulatory and contractual requirements.

Control ID: Washoe County does not currently routinely bill grantors for use allowances on fixed assets. However, fixed assets used for Federal Emergency Management Agency (FEMA) declared emergencies are billed to the Federal Government under a FEMA grant at the federal approved equipment rate.
GR - 1.21.1.

Objective: If the organization has an indirect cost allocation plan, it is prepared in accordance with the provisions of the Uniform Guidance.
GR - 1.22.

Risk: Granting agencies may be billed for unallowable costs. Potential noncompliance with legal, regulatory and contractual requirements.

Control ID: Washoe County prepares a County-wide Shared Costs Plan that has been prepared in accordance with Uniform Guidance as certified by the Comptroller or other member of senior financial management. The Social Services, Health and DA departments also have plans prepared in accordance with Uniform Guidance and reviewed by the state and federal governments.
GR - 1.22.1.

Objective: Audit cognizance for the indirect cost allocation plan has been established, and the rates are accepted by all participating federal and state agencies.
GR - 1.23.

Risk: Granting agencies may be billed for unallowable costs. Potential noncompliance with legal, regulatory and contractual requirements.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Control ID: Indirect costs are allocated only to those grants that allow indirect charges. Social Services/CPS, Health and the District Attorney's office have department specific Cost Allocation Plans that have been reviewed at both the state and federal level and those department charge indirect costs based on those plans. Other departments that do not have department specific cost allocation plans, use the County-wide Shared Costs Plan that has been prepared in accordance with the provisions of the Uniform Guidance and the rate that will be applied is approved by the grantor at the time the grant is awarded. Indirect costs are included on financial reports by Department Grant Coordinators, reviewed and approved by program managers prior to submission to the granting agency.

Objective: Employee time allocation methods are in accordance with the standards outlined in federal circulars or agency regulations. Time and effort reporting could be rejected.
GR - 1.24.

Risk: Granting agencies may be billed for unallowable costs. Potential noncompliance with legal, regulatory and contractual requirements.

Control ID: Employees charged to grants on a full time basis are coded to the grant through position control in SAP. Employees working on grants on an intermittent basis, code their time to the grant on their time entry and their supervisors approve the time and account coding before releasing to payroll for processing. Payroll reports are reviewed by Department Grant Coordinators prior to request for reimbursement. Appropriate and accurate timekeeping is a topic at grant committee meetings and trainings.
GR - 1.24.1.

Objective: A written procurement manual exists that complies with the applicable grant agreements and the Uniform Guidance.
GR - 1.25.

Risk: Appropriate procurement procedures are not followed. Potential for noncompliance with legal, regulatory contractual requirements and County policy and procedures. Errors could be made and not be timely identified and corrected.

Control ID: Department Grant Coordinators follow the County's procurement procedures and ensure that charges comply with applicable grant agreements and OMB circulars. Department Grant Coordinators are knowledgeable regarding allowable costs and review expenditures prior to submitting requests for reimbursements. Requests for reimbursements and supporting documentation are reviewed by program management prior to submission to granting agency. Managers responsible for cost centers approve all purchases prior to the expenditures posting to the grant internal orders via workflow in SAP. Procurement is managed through the Purchasing Department. The Purchasing Department is aware of state and federal purchasing requirements. For example, debarment tests are conducted on vendors.
GR - 1.25.1.

Washoe County Internal Controls - Overview - FY 2015-2016
Comptroller's Office
GR - Grants

Objective: Establish and maintain effective internal controls over personally identifiable information received through a Federal award.
GR - 1.26.

Risk: Individual's personally identifiable information received through a federal award can be accidentally publicly disclosed if appropriate safety measures are not being taken.

Control ID: Departments need to establish and maintain effective internal controls over individual's personally identifiable information received through a Federal award and take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings. Reasonable measures have to be taken to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive and confidential.
GR - 1.26.1.

Appendix D

SYSTEM OF AWARD MANAGEMENT (SAM) SEARCH

When checking the SAM registration and excluded parties status for a potential subrecipient go to Sam.gov.

Select SEARCH RECORDS



The screenshot shows the SAM.gov website interface. At the top, there is a dark blue navigation bar with the following links: HOME, SEARCH RECORDS, DATA ACCESS, GENERAL INFO, and HELP. A red arrow points to the 'SEARCH RECORDS' link. Below the navigation bar, there are three main content panels. The first panel is titled 'CREATE USER ACCOUNT' and contains text about needing a new SAM User Account. The second panel is titled 'REGISTER/UPDATE ENTITY' and contains text about registering or updating an entity, with a 'Register/Update Entity' button. The third panel is titled 'SEARCH RECORDS' and contains text about searching for records, with a 'Search Records' button. Below these panels, there is a 'WHAT IS SAM?' section with a 'Need Help?' button. Further down, there are three columns of news and announcements: 'NEWS AND ANNOUNCEMENTS', 'USER GUIDES/HELPFUL HINTS', and 'ATTENTION EXTRACT AND WEB SERVICE USERS'. At the bottom of the page, there is a footer with the text 'SAM | System for Award Management 1.0', 'IBM v1.P.40.20151201-1827', 'WWW8', and logos for GSA, the Department of the Interior, and USA.gov.

HOME SEARCH RECORDS DATA ACCESS GENERAL INFO HELP

CREATE USER ACCOUNT
Your CCR username will not work in SAM. You will need a new SAM User Account to register or update your entity records. You will also need to create a SAM User Account if you are a government official and need to create Exclusions or search for FOUO information.
Create User Account

REGISTER/UPDATE ENTITY
You can register your Entity (business, individual, or government agency) to do business with the Federal Government. If you are interested in registering or updating your Entity, you must first create a user account.
Register/Update Entity
New! Use the SAM Status Tracker to: Check Status

SEARCH RECORDS
All entity records from CCR/FedReg and ORCA and exclusion records from EPLS, active or expired, were moved to SAM. You can search these records and new ones created in SAM. If you are a government user logged in with your SAM user account, you will automatically have access to FOUO information.
Search Records

WHAT IS SAM? Need Help?

The **System for Award Management (SAM)** is the Official U.S. Government system that consolidated the capabilities of CCR/FedReg, ORCA, and EPLS. There is **NO** fee to register for this site. Entities may register at no cost directly from this page. User guides and webinars are available under the Help tab.

NEWS AND ANNOUNCEMENTS
FY2015 Service Contract Reporting (SCR) is now enabled at SAM. By December 15, 2015, users with the role of Entity Administrator, Entity Registration Representative or Reporter should log into SAM, select Register/Update Entity and click Service Contract Report. If the user does not see the "Service Contract Report" option, then FPDS has not identified any actions that are subject to the SCR requirement for the applicable reporting period (FY2015). For instructions on how to complete SCR, please refer to the [SAM Quick Start Guide for Service Contract Reporting](#) or the [SAM User Guide](#).

USER GUIDES/HELPFUL HINTS
Find the full SAM User Guide, Quick Start Guides, Helpful Hints, and Webinars on the HELP tab.
Use the [SAM Status Tracker](#) to check your SAM entity registration status.
Federal Service Desk
Search FAQs or request additional help at the [Federal Service Desk](#).

ATTENTION EXTRACT AND WEB SERVICE USERS
Support for the legacy-formatted extracts and web services in SAM ended on October 31st, 2014. Federal systems using SAM data must convert to the SAM-formatted extracts and web services. If you see "You do not have access to this extract" you need to submit a Data Access Request for the appropriate role by logging in with the account that needs the role. Go to "Data Access" then click on either "System Data Access Request" or "Individual Data Access Request" (depending on your user account type) and follow the prompts to submit the request. Visit the [openIAE GitHub site](#) for more information about SAM's data, web services, and [RESTful API](#).

SAM | System for Award Management 1.0 IBM v1.P.40.20151201-1827 WWW8

Note to all Users: This is a Federal Government computer system. Use of this system constitutes consent to monitoring at all times.

GSA Department of the Interior USA.gov

Enter Entity DUNS Number and SEARCH

SAM
SYSTEM FOR AWARD MANAGEMENT

USER NAME PASSWORD **LOG IN**
[Forgot Username?](#) [Forgot Password?](#)
[Create an Account](#)

HOME SEARCH RECORDS DATA ACCESS GENERAL INFO HELP

Search Records

Search Tips to Get Started:

- Looking for entity registration records or entity exclusion records in SAM? Use **Quick Search** if you know an entity's Business Name, DUNS Number or CAGE Code. Use **Advanced Search** to structure your search using multiple categories and criteria.
- Are you a Federal government employee? Create a SAM user account with your government e-mail address and log into SAM before searching to see FOUO information and registrants who chose to opt out of the public search.
- Conducting small business-focused research? In addition to what is contained in SAM, small businesses can provide the Small Business Administration (SBA) supplemental information about themselves. Use the [SBA's Dynamic Small Business Search](#) to conduct further market research.
- Trying to find a contractor participating in the Disaster Response Registry? Use the **Disaster Response Registry Search** to locate contractors willing to provide debris removal, distribution of supplies, reconstruction, and other disaster or emergency relief services in the event of a national disaster.

QUICK SEARCH:

Enter your specific search term
(Example of search term includes the entity's name, etc.)

DUNS Number Search:

CAGE Code Search:

ADVANCED SEARCH:
Use specific criteria in multiple categories to structure your search.

SAM | System for Award Management 1.0 IBM v1.P.40.20151201-1827 WWW7

Note to all Users: This is a Federal Government computer system. Use of this system constitutes consent to monitoring at all times.

GSA USA.gov

SEARCH may also be done by Name if DUNS number is not known at the time of search.

Select View Details

SAM
SYSTEM FOR AWARD MANAGEMENT

USER NAME: PASSWORD: [LOG IN](#)
[Forgot Username?](#) [Forgot Password?](#) [Create an Account](#)

HOME SEARCH RECORDS DATA ACCESS GENERAL INFO HELP

Search Results

- Your search results represent the broadest set of records that match your search criteria. You may get entity registration records that are still in progress or have been submitted, but not yet activated. Check the status of each record.
- Of note, some entities choose to opt out of public display. Even if they are registered in SAM, you will not see their entity registration records in a public search. You can only see them if you log in as Federal Government user.
- You can refine your search results. If you used the Quick Search, select the search filters on this page. If you used one of the Advanced Search options, select the Edit Search button.
- If you want to perform a new search, use the Clear button to remove your current search results. If you are logged in with your SAM User Account, you can save your search criteria to run again later using the Save Search button.
- NOTE:** Please read this important message when searching for exclusion records.

Current Search Terms: children's cabinet*

[Clear Search](#)

TOTAL RECORDS: 1
Result page 1 of 1

Save PDF Export Results Print

Sort by Modified Date Order by Descending

FILTER RESULTS

Your search for ""children's"cabinet*" returned the following results...

| | | |
|---|--------------------------------------|------------------------------|
| Entity | Children's Cabinet, Inc., The | Status: Active |
| DUNS: 623996514 | CAGE Code: 4DL77 | View Details |
| Has Active Exclusion?: No | DoDAAC: | |
| Expiration Date: 03/09/2016 | Delinquent Federal Debt? No | |
| Purpose of Registration: Federal Assistance Awards Only | | |

By Record Status

Active
 Inactive

By Functional Area

Entity Management
 Performance Information

Glossary

Search Results

Entity
Exclusion

Search Filters

By Record Status
By Functional Area - Entity Management
By Functional Area - Performance Information

If using search by Name ensure that both Active and Inactive record status selected. If nothing comes up then the entity is not registered with SAM.gov (send the SAM.gov registration worksheet).

Verify that:

1. Registration status is Active and
2. There are no Exclusions,
3. Name must match Name of entity on the sub-award agreement.

SAM
SYSTEM FOR AWARD MANAGEMENT

USER NAME: PASSWORD: LOG IN
[Forgot Username?](#) [Forgot Password?](#) [Create an Account](#)

HOME SEARCH RECORDS DATA ACCESS GENERAL INFO HELP

Entity Dashboard

Children's Cabinet, Inc., The
DUNS: 623996514 CAGE Code: 4DL77
Status: Active
Expiration Date: 03/06/2016
Purpose of Registration: Federal Assistance Awards Only

1090 S Rock Blvd
Reno, NV, 89502-7116,
UNITED STATES

Entity Overview

Entity Information

Name: Children's Cabinet, Inc., The
Business Type: Business or Organization
POC Name: Michael Po
Registration Status: Active
Activation Date: 03/16/2015
Expiration Date: 03/06/2016

Exclusions

Active Exclusion Records: No

RETURN TO SEARCH



Identifying Entities Registered for Grants

1 How can I check to see if an entity is active in SAM?

Use the following steps to see if an entity is actively registered for grants and financial assistance in SAM:

- Log in to SAM using your SAM individual account. You must be logged in using your SAM account, which was created using your government email, in order to view those entities who have chosen not to have their information displayed publicly (i.e., the entity has chosen to 'opt-out').
- Perform a search in SAM for the entity's DUNS number at www.sam.gov from either the homepage or from the Search tab. Type the DUNS number into the search box and click "Search".
- If no match is found for the entity's DUNS number, the entity is not actively registered in SAM.
- If a match is found, it will show in a box marked "Entity". Check the status in the top-right corner of the box. If the status indicates "Active", the entity is actively registered in SAM for grants and financial assistance.
- Click on the '+' icon in the box to expand it. Expanding the box will allow you to view whether the entity has current Delinquent Federal Debt, as determined by the Department of Treasury.

Click "View Details" to open the entity's dashboard for more information. Use the navigation links on the left side of the screen to review the entity's specific data in the provided sections. Note that grants and financial assistance registrants are only required to complete the "Core Data" and "Points of Contact" sections.



Identifying Entities Registered for Contracts

1 How can I check to see if a prospective contractor is active in SAM?

Registrants in SAM are asked to indicate if they wish to be considered for federal contracts. If yes, they complete the provisions associated with the annual representations identified in FAR subpart 4.1202. Only if this is completed can an entity be considered actively registered, per FAR subpart 4.11.

Use the following steps to see if the prospective contractor is actively registered for contracts in SAM:

- Log in to SAM using your SAM individual account. You must be logged in using your SAM account that was created using a government email, in order to view those entities who have chosen not to have their information displayed publicly (i.e., the entity has chosen to 'opt-out').
- Perform a search in SAM for the entity's DUNS number at www.sam.gov either from the homepage or from the Search tab. Type the DUNS number into the search box and click "Search".
- If no match is found for the entity's DUNS, the entity is not actively registered in SAM. You can apply the inactive filter by clicking on inactive and hitting apply filter.
- If a match is found, it will show in a box marked "Entity". Check the status in the top right corner of the box. If the status indicates "Active", then the entity is actively registered in SAM for at least one type of federal award.
- Click on the '+' icon in the box to expand it. Expanding the box will allow you to view if the entity has current Delinquent Federal Debt, as identified by the Department of Treasury.
- Click "View Details" to open the dashboard to confirm the entity is registered for contracts.
 - If the annual renewal date shown on the dashboard is July 31, 2013 or earlier, the entity's record was migrated from CCR. Consider this entity actively registered, per FAR subpart 4.11. You can review the registration details using the navigation bar on the left side of the screen. Note that there will be information in the Representations and Certifications section only if the entity also had a previous ORCA record.
 - If the annual renewal date shown on the dashboard is August 1, 2013 or later, the entity has entered or renewed their record directly in SAM. Review the Representations and Certifications section using the navigation links on the left side of the screen.
 - If there is data in the Representations and Certifications section, the entity has registered for contracts and is actively registered, per FAR subpart 4.11.
 - If there is no data provided in the Representations and Certifications section, the entity is not registered for contracts. The entity is not active, per FAR subpart 4.11.



2 Where can I find specific data in the entity's registration?

An entity's registration is split into sections. For potential contractors these sections include:

- Core Data
- Assertions
- Representations and Certifications
- Points of Contact

2.1 Core Data

Core Data includes: DUNS number, address information, Tax Identification Number (TIN), Electronic Funds Transfer (EFT) information (i.e., bank account), CAGE code, general business information (corporate data, company type classifications, etc), criminal proceedings data, executive compensation data, and disaster relief registration. Note that in the General Information section of the Core Data, you will only see SBA Certifications for 8(a) Program Participants entities if the certification exists; you will not see a 'No' or other negative response. Similarly, if the entity has no Federal Debt then there will be no entry here, you will not see a 'No' or other negative response.

Can government users see all of the data in the Core section?

Some information is not displayed or is available based on user access levels.

- EFT information is available only to those government users who have completed paperwork requesting sensitive access to SAM data. If you would like to request this access, login to your SAM account and click on "Individual Data Access Request" located under "Data". You should also check with your agency system administrator to confirm you need access to this information.
- Executive compensation information is only provided, per the FAR, in conjunction with specific awards meeting the Federal Funding Accountability and Transparency Act (FFATA) requirements. If an entity receives an award that meets the FFATA requirements, its executive compensation information will be displayed in USASPENDING.gov along with that award.
- Criminal proceeding information is displayed at the Federal Awardee Performance Integrity Information System (FAPIS) at www.fapiis.gov.

2.2 Assertions

What are Assertions? And what information is in this section?

Size metrics (total annual receipts/number of employees), NAICS codes in which the entity does business, and Product Service Codes (PSCs) the entity normally sells are captured here.



The size metric information (i.e., total annual receipts and number of employees), provided by the entity, is used by the Small Business Administration (SBA) to provide a size indicator for each NAICS by comparing the entity's information to the SBA's NAICS size standards table.

PLEASE NOTE: THE INDICATOR IS NOT FOUND IN THE ASSERTIONS SECTION BUT IN THE REPRESENTATIONS AND CERTIFICATIONS SECTION.

The entity provides the major NAICS codes with which it would like to be identified for purposes of government market research. Size status indicators per NAICS code ARE NOT provided in this section but in the representations and certifications section, per the FAR. Government officials should be aware that simply because an entity has not listed a NAICS code here in the assertions section DOES NOT preclude you from accepting an offer from or awarding an action to an entity.

The entity also provides the Product Service Codes with which it would like to be identified for purposes of government market research.

2.3 Representations and Certifications

Representations and Certifications include the annual FAR provisions that are required in solicitations, per FAR 4.12. These include an entity's certification to size status (i.e., small or other than small), whether they are an SBA-certified HUBZone entity (validated by SBA), and other socio-economic information. If the entity is interested in Department of Defense (DoD) contracts, DFARS annual provisions are also provided here. Finally, if the entity is interested in Architect and Engineering (A&E) opportunities, additional information is provided here as well.

2.4 Points of Contact

Points of Contact are provided by the entity and provide names of individuals responsible for activities at the entity, such as financial information.



Quick Start Guide for Entities Interested in Being Eligible for Government Contracts



How to register your entity to be eligible for CONTRACTS in SAM:

Before you register, you need to know the following:

What is an Entity?

In SAM, your company/business/organization is now referred to as an "Entity."

- **REGISTERING IN SAM IS FREE.**
- If you were registered in CCR, your company's information is already in SAM. You just need to set up a SAM account. See the "Migrating Roles" Quick Start Guide.

Your Entity's DUNS Number

You need a DUNS to register your entity in SAM.

- If you do not have a DUNS number, you can request a DUNS number for free by visiting D&B at <http://fedgov.dnb.com/webform>
- It takes 1-2 business days to obtain a DUNS.

Your Entity's Taxpayer Identification Number (TIN)

You need your entity's Tax ID Number (TIN) and taxpayer name (as it appears on your last tax return). Foreign entities that do not pay employees within the U.S. do not need to provide a TIN.

- A TIN is an Employer Identification Number (EIN) assigned by the Internal Revenue Service (IRS).
- Sole proprietors may use their Social Security Number (SSN) assigned by the Social Security Administration (SSA) if they do not have a TIN, but please be advised it will not be treated as privacy act data in SAM.
- To obtain an EIN visit: www.irs.gov/businesses/small/article/0,,id=102767,00.html
- Activating a new EIN with the IRS takes 2-5 weeks.

Steps For Registering Your Entity in SAM

1. Go to www.sam.gov
2. Create a Individual Account and Login
3. Click "Register New Entity" under "Register/Update Entity" on your "My SAM" page
4. Select your type of Entity
5. Select "Yes" to "Do you wish to bid on contracts?"
6. Complete "Core Data"
 - ✓ Validate your DUNS information
 - ✓ Enter Business Information (TIN, etc.)
 - ✓ Enter CAGE code if you have one. If not, one will be assigned to you after your registration is completed. Foreign registrants must enter NCAGE code.
 - ✓ Enter General Information (business types, organization structure, etc)
 - ✓ Financial Information (Electronic Funds Transfer (EFT)Information)
 - ✓ Executive Compensation Proceedings Details
7. Complete "Assertions"
 - ✓ Goods and Services (NAICS, PSC, etc.)
 - ✓ Size Metrics
 - ✓ EDI Information
 - ✓ Disaster Relief Information
8. Complete "Representations and Certifications"
 - ✓ FAR Responses
 - ✓ Architect-Engineer Responses
 - ✓ DFARS Responses
9. Complete "Points of Contact"
10. Your entity registration will become active after 3-5 days when the IRS validates your TIN information.

How do I get more information? Take a look at the SAM User Guide.



Go to Our Website: www.sam.gov

Contact the SAM Help Desk: www.fsd.gov

Appendix E



WASHOE COUNTY SUBRECIPIENT & CONTRACTOR DETERMINATION

Project/Program Title:

Amount of Award: \$

To determine if the contracting relationship is one of a subrecipient or a contractor review the scope of work to be performed, characteristics of the entity or entities being considered, and the role of the entity in the operation of the federally funded project. See 2 CFR 200.330.

SUBRECIPIENTS

A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- Determines who is eligible to receive what Federal financial assistance;
- Has its performance measured in relation to whether objectives of the Federal program are met;
- Has responsibility for programmatic decision making;
- Has responsibility for adherence to applicable Federal program requirements specified in the award; and
- In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorized statute, as opposed to providing goods or services for the benefit of the pass-through entity.

CONTRACTORS

A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds:

- Provides the goods and services within normal business operations;
- Provides similar goods or services to many different purchasers;
- Normally operates in a competitive environment;
- Provides goods or services that are ancillary to the operation of the Federal program;
- The contractor is not subject to compliance requirements of the Federal program; and
- Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

There may be unusual circumstances or exceptions to the listed characteristics. If the primary purpose of the activity is to directly enhance the program or serve the program participants, it is generally a grant/subaward. If the work or product will benefit or support the agency responsible for the program, it is likely a contract.

In some instance the appropriate award instrument is clear, when it is not, it may be necessary to scrutinize the role of the party delivering the services to make the proper determination. Is the entity providing these same services for profit to multiple customers in a competitive environment? If so, the entity is a vendor. Is the entity already operating a program to assist these clients and using the funds to build on or expend the services? If so, the entity is a subrecipient.

§200.92 Subaward.

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

§200.22 Contract.

Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward see (§200.92 Subaward).

DETERMINATION:

Subrecipient Contractor Date of Determination: _____

Reason(s) for Determination:

Preparer Signature: _____ Date: _____
Name/Title:



Appendix F

WASHOE COUNTY PREAWARD RISK ASSESSMENT

INSTRUCTIONS

An evaluation of each subrecipient's risk of noncompliance with Federal statutes, regulations and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring is required by federal regulation 2 CFR, Part 200.331 (4)(b). The assessment of county subrecipients must be conducted prior to award of a subagreement and the results of the assessment must be taken into consideration when developing the monitoring plan.

This assessment was developed to be comprehensive; some items may not be applicable to certain programs or subrecipients. If items are not applicable, "N/A" should be used. Grant staff should document the rationale for not applying a particular risk item.

Staff should use professional judgment in determining the overall risk level of a subrecipient based on the information gathered from each component of the assessment. The level of assessment required is determined by the amount of the subaward as noted below.

1. For all subawards up to \$99,999 a risk assessment must be completed using the General Assessment, and conducting a SAM debarment check.
2. For subawards of \$100,000 or more a risk assessment should be completed using:
 - a. General Assessment
 - b. Expanded General Assessment
 - c. Overall Fiscal Assessment
 - d. Financial System Assessment,
 - e. Programmatic Assessment, and
 - f. Conducting a SAM debarment check.
3. For subawards of \$500,000 or more the sub-award risk assessment should also include:
 - a. General Assessment
 - b. Expanded General Assessment
 - c. Overall Fiscal Assessment
 - d. Financial System Assessment
 - e. Nonprofit Financial Stability Assessment (as applicable)
 - f. Programmatic Assessment, and
 - g. Conducting a SAM debarment check.

This preaward risk assessment is a modification of a tool developed as a result of an intergovernmental partnership established by the Association of Government Accountants (AGA) in cooperation with the US Office of Management and Budget¹.

¹ Risk Assessment Monitoring Tool, AGP Partnership for Intergovernmental Management and Accountability, February 2009.

ENTITY INFORMATION

ENTITY NAME: _____

ENTITY ADDRESS: _____

ENTITY CONTACT: _____

PHONE NUMBER: _____ EMAIL: _____

DUNS Number: _____ Entity name associated with DUNS # must match entity name on grant agreement.

SAM - Excluded Parties List System review: Check SAM.gov for entity status. Verify the following items, and attach a screen shot of the status verification to the Preaward Risk Assessment documents.

- Entity Name matches _____
- Status is Active _____
- No Active Exclusions _____
- No Delinquent Federal Debt _____
- Expiration Date: _____

Subaward Program Name:

Amount of potential Subaward: \$

Larger grants such as those in excess of \$100,000 constitute a greater risk.

Is a Single Audit Required? Yes _____ No _____

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.

Fiscal Year Start Date: Subrecipient entity's fiscal year start date.

Scope of Work: Provide a brief summary of the project components to be performed by the subrecipient. Include specific detail for the work to be performed, key functions of the subgrantee and expected outcomes.

Complete the following sections as appropriate based on the amount of the subaward.

GENERAL ASSESSMENT – All Awards *Yes responses indicate risk.*

EXPANDED GENERAL ASSESSMENT- Awards of \$100,000 or greater *Yes responses indicate risk.*

OVERALL FISCAL ASSESSMENT - Awards of \$100,000 or greater *Yes responses indicate risk.*

FINANCIAL SYSTEM ASSESSMENT- Awards of \$100,000 or greater *No responses indicate risk.*

PROGRAMMATIC ASSESSMENT- Awards of \$100,000 or greater In addition to questions one and two, departments should review their applicable programmatic requirements found in statute, rule and supplements to develop one appropriate program specific risk criteria to assess compliance (question #3).

Nonprofit Financial Stability Assessment - Awards of \$500,000 or greater

REVIEW OF ADDITIONAL DOCUMENTS MAY INCLUDE (optional)

Reviewing the entity’s policies and procedures related to eligibility and purchasing is of critical importance if the subrecipient entity is responsible for these functions as a part of their scope of work. Additionally, the quality and capability of staff carrying out the activities has a significant impact on the success of a project. Review of key personnel is especially important when the key personnel are new to the subrecipient entity or unknown to the granting department. Review of additional documents is recommended, especially when the entity awarding department does not have previous experience with a subrecipient entity.

1. Eligibility Policy and Procedures:

- a. Written procedures _____
- b. Complies with all eligibility requirements _____
- c. Mandatory for all participants _____
- d. Staff is versed policy and consistently uses _____
- e. Participant recorded confirm compliance _____

2. Procurement Policy and Procedures:

- a. Written procedures _____
- b. Code of Conduct _____
- c. Conflict of Interest _____
- d. Acceptable methods of procurement _____
- e. Features of solicitation _____

3. Key Personnel

- a. Job Descriptions or Roles and Responsibilities _____
- b. Resume/Vita or details qualifications _____

SUBAWARD RISK ASSESSMENT RATING AND DETERMINATION

Total the number of points for each section as related to risk. Record the number of Yes’s for sections 1-3, and number of No’s for items 4 and 5, and indicate NA for those sections that are not applicable. Total all sections.

- 1. GENERAL ASSESSMENT - *Yes responses indicate risk.* Total YES _____
- 2. EXPANDED GENERAL ASSESSMENT - *Yes responses indicate risk.* Total YES _____
- 3. OVERALL FISCAL ASSESSMENT - *Yes responses indicate risk.* Total YES _____
- 4. FINANCIAL SYSTEM ASSESSMENT - *No responses indicate risk.* Total NO _____
- 5. PROGRAMMATIC ASSESSMENT - *No responses indicate risk.* Total NO _____
- 6. NONPROFIT FINANCIAL STABILITY ASSESSMENT- *Summary comments:*
TOTAL _____

OVERALL RISK LEVEL DETERMINATION:

Staff should use professional judgment in determining the overall risk level of a subrecipient based on the information gathered from each component of the assessment. The grant professional should consider the experience of the subrecipient, the number of items included in the ratings tally, and the specifics of the responses that indicate increased risk.

The grant professional must indicate the level of risk, and provide a date of the determination

High Risk _____ Low Risk _____ Date of Determination: _____

Reason for Determination:

The grant professional must provide a brief summary regarding the reason(s) for the determination as High Risk, or as Low Risk.

If High Risk - Specific Conditions to be included in sub-recipient Agreement and/or Monitoring Plan:

If the subrecipient is determined to be High Risk, the grant professional must indicate the specific conditions to be imposed on the subrecipient, and/or additional technical assistance or support to be provided. *Any specific conditions must be promptly removed once the conditions that prompted them have been corrected.*

It is appropriate to impose specific conditions upon the subrecipient, if the subrecipient is determined to be High Risk. Specific Conditions should include one or more of the following:

1. Requiring payments as reimbursements rather than advance payments;
2. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
3. Requiring additional, and/or more detailed financial reports;
4. Requiring additional project monitoring;
5. Requiring the grantee to obtain technical or management assistance; or
6. Establishing additional prior approvals.

Additionally the granting department may:

- Provide subrecipients with training and technical assistance on program-related matters; and
- Perform on-site reviews of the subrecipient's program operations.
- Arranging for agreed-upon-procedures engagements as described in §200.425 Audit services.

The awarding Department must notify the subrecipient as to the nature of the additional requirements including:

1. The reason why the additional requirements are being imposed;
2. The nature of the action needed to remove the additional requirement, if applicable;
3. The time allowed for completing the actions if applicable, and
4. The method for requesting reconsideration of the additional requirements imposed.

Preparer Signature: The grant professional completing the assessment must sign and date the Preaward Risk Assessment.

WASHOE COUNTY PREAWARD RISK ASSESSMENT

ENTITY INFORMATION

ENTITY NAME: _____

ENTITY ADDRESS: _____

ENTITY CONTACT: _____

PHONE NUMBER: _____ EMAIL: _____

DUNS Number: _____

SAM - Excluded Parties List System review:

- Entity Name matches _____
- Status is Active _____
- No Active Exclusions _____
- No Delinquent Federal Debt _____
- Expiration Date: _____

Subaward Program Name:

Amount of potential Subaward: \$

Is a Single Audit Required? Yes _____ No _____

Fiscal Year Start Date:

Scope of Work:

GENERAL ASSESSMENT – All Awards

Yes responses indicate risk.

2. Is the entity new to operating or managing State and/or Federal funds (has not done so within the past five years)? Obtain a summary of subrecipient's federal funds experience (how much, what programs, and for how long).

Yes ____ No ____ N/A ____

Comments:

3. Is this program new for the entity (managed for less than three years)?

Yes ____ No ____ N/A ____

Comments:

If Yes, has the entity managed a similar project or subaward?

4. Has it been more than one year since the recipient received a single audit (no single audit=higher risk)?

Yes ____ No ____ N/A ____

Comments:

5. Has it been more than two years since the program or a similar program was audited as a major program?

Yes ____ No ____ N/A ____

Comments:

If no, then were there findings?

Yes ____ No ____ N/A ____

What were the number and extent of findings/violations in prior audits (more violations/more sever-higher risk), and does the entity have a corrective action plan for correcting findings?

Comments:

6. Are the staff assigned to the program inexperienced with the program (worked with the program less than two funding cycles)?

Yes ____ No ____ N/A ____

Comments:

7. Are the entity's financial and/or administration management systems new or substantially changed?

Yes ____ No ____ N/A ____

Comments:

8. Has the entity received monitoring directly from a Federal awarding agency, which resulted in findings/ violations?

Yes ___ No ___ N/A ___

If yes, *what were the number and extent of findings/violations (more violations/more sever-higher risk), and does the entity have a corrective action plan for correcting findings?*

Comments:

EXPANDED GENERAL ASSESSMENT- Awards of \$100,000 or greater

Yes responses indicate risk.

9. Has there been high staff turnover or agency reorganization that affects this program?

Yes ___ No ___ N/A ___

Comments:

10. Has the entity been untimely in the submission of:

- a. Applications Yes ___ No ___ N/A ___
- b. Amendments Yes ___ No ___ N/A ___
- c. Fiscal Reporting Yes ___ No ___ N/A ___
- d. Draw Downs Yes ___ No ___ N/A ___
- e. Budgets/Revisions Yes ___ No ___ N/A ___

11. Has the entity been untimely in responding to program and/or fiscal questions?

Yes ___ No ___ N/A ___

Comments:

12. Is the program unusually complex (e.g. program, funding, match requirements)?

Yes ___ No ___ N/A ___

Comments:

13. Have any other entities (program offices, auditors, staff employed by the entity, etc.) alerted us to potential risk areas?

Yes ___ No ___ N/A ___

Comments:

14. Does the entity lack effective procedures and controls?

(Programmatic, eligibility, fiscal, purchasing, personnel activity reporting, etc...)

Yes ___ No ___ N/A ___

Comments:

15. Have more than three funding cycles passed since the entity had an on-site monitoring visit?

Yes ____ No ____ N/A ____
Comments:

16. Were there findings/violations in the prior visit?

Yes ____ No ____ N/A ____
Comments:

OVERALL FISCAL ASSESSMENT - Awards of \$100,000 or greater
Yes responses indicate risk.

1. Is this grant large in terms of percentage of overall funding for the entity?

Yes ____ No ____ N/A ____
Comments:

2. Has the entity frequently been untimely in the drawdown of funds?

Yes ____ No ____ N/A ____
Comments:

3. Are there variations between expenditures and the budget?

Yes ____ No ____ N/A ____ (*large variations=higher risk*)
Comments:

4. Has the entity returned significant unspent funds?

Yes ____ No ____ N/A ____
Comments:

5. Does the entity have a large amount of budget carryover?

Yes ____ No ____ N/A ____
Comments:

6. Are the entity's fiscal statistics outside of tolerance or trends (*e.g. much more expenditures on supplies than average*)?

Yes ____ No ____ N/A ____
Comments:

FINANCIAL SYSTEM ASSESSMENT- Awards of \$100,000 or greater

No responses indicate risk.

1. Does the entity have a financial management system in place to track and record the program expenditures? (Example QuickBooks, Visual Bookkeeper, Socrates Media, Peachtree or a Custom Proprietary System)

Yes ____ No ____ N/A ____

Comments:

2. Does the accounting system identify the receipts and expenditure of program funds separately for each award?

Yes ____ No ____ N/A ____

Comments:

3. Will the accounting system provide for the recording of expenditures for each award by budget cost categories shown in the approved budget?

Yes ____ No ____ N/A ____

Comments:

4. Does the entity have a time and accounting system to track effort by cost objective?

Yes ____ No ____ N/A ____

Comments:

5. Does the entity have an indirect cost rate that is approved and current?

Yes ____ No ____ N/A ____

If Yes, who approved the rate?

If No, does the entity use the De Minimis 10% MTDC?

PROGRAMMATIC ASSESSMENT- Awards of \$100,000 or greater

1. Did the entity meet annual measurable achievement objectives?

Yes___ No___ N/A_____

Comments:

2. Does the entity have a system in place for ensuring client eligibility?

Yes___ No___ N/A_____

Comments:

3. Other (Program Specific) criteria which is required by applicable statute/program rule.

Nonprofit Financial Stability Assessment - Awards of \$500,000 or greater

1. Purpose:

The purpose of this section is to use the Financial Statements of the entity/organization to determine its financial health. If independently audited financial statements are not available, the organization's Chief Financial Officer should be asked to prepare and certify a financial statement. Generally accepted Accounting Principles require organizations to maintain the following information:

b. Financial Statements

- Balance sheet or statement of financial position
- Income statement or statement of operations

c. Notes to the Financial Statements such as:

- Accounting policies (financial internal controls)

2. The balance sheet statement can answer these questions:

- Can the organization pay its bills?

Yes ___ No ___ N/A ___

Comments:

- Is there cash left over after the organization pays its bills?

Yes ___ No ___ N/A ___

Comments:

2.. Notes to the Financial Statement and Report of the Independent Auditor

The notes and "management letters" contain information and disclosures important to the understanding of the financial statements. The notes may seem lengthy and detailed, but some of the real story may be gleaned from a careful reading of these notes.

- a. Does the independent audit report for the most recent fiscal year contain an unmodified audit opinion?

Yes ___ No ___ N/A ___

If not, what kind of opinion did the auditor express? Why did the entity not receive an unmodified opinion?

REVIEW OF ADDITIONAL DOCUMENTS MAY INCLUDE (optional)

4. Eligibility Policy and Procedures:

- a. Written procedures _____
- b. Complies with all eligibility requirements _____
- c. Mandatory for all participants _____
- d. Staff is versed policy and consistently uses _____
- e. Participant recorded confirm compliance _____

5. Procurement Policy and Procedures:

- a. Written procedures _____
- b. Code of Conduct _____
- c. Conflict of Interest _____
- d. Acceptable methods of procurement _____
- e. Features of solicitation _____

6. Key Personnel

- a. Job Descriptions or Roles and Responsibilities _____
- b. Resume/Vita or details qualifications _____

SUBAWARD RISK ASSESSMENT RATING AND DETERMINATION

- 1. GENERAL ASSESSMENT - *Yes responses indicate risk.* Total YES _____
- 2. EXPANDED GENERAL ASSESSMENT - *Yes responses indicate risk.* Total YES _____
- 3. OVERALL FISCAL ASSESSMENT - *Yes responses indicate risk.* Total YES _____
- 4. FINANCIAL SYSTEM ASSESSMENT - *No responses indicate risk.* Total NO _____
- 5. PROGRAMMATIC ASSESSMENT - *No responses indicate risk.* Total NO _____
- 6. NONPROFIT FINANCIAL STABILITY ASSESSMENT- *Summary comments:*

TOTAL _____

OVERALL RISK LEVEL DETERMINATION:

High Risk _____ Low Risk _____ Date of Determination: _____

Reason(s) for Determination:

If High Risk - Specific Conditions to be included in sub-recipient Agreement and/or Monitoring Plan:

Preparer Signature: _____ Date: _____

Name/Title:

Appendix G



WASHOE COUNTY SUBAWARD AGREEMENT CHECKLIST

Project/Program Title:

Sub-Grantee Entity:

Amount of Award: \$

2 CFR 200.331 Requirements for pass-through entities. All pass-through entities must: Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward.

The agreement must include the following required information:

- Subrecipient Name (must match DUNS number)
- Subrecipient DUNS number
- Federal Award Identification Number (FAIN)
- Federal Award Date¹
- Sub-Award Period of Performance (Start and End date)
- Amount of Federal Funds obligated by this action by County to Subrecipient
- Total amount of the Federal Funds obligated to subrecipient by County including current obligation.
- Total amount of the Federal Award committed to subrecipient by County
- Federal award project description, (purpose and intended outcomes)
- Name of federal awarding agency, pass-through entity
- Contact information for the awarding official at County
- CFDA number and name
- Identification of whether the award is for research and development
- Indirect cost rate for the federal award (including if the de minimis rate is charged)
- Eligible expenses covered by the grant

¹ *Federal award date* means the date when the Federal award is signed by the authorized official of the Federal awarding agency.

- Special terms and conditions
- Reporting requirements (financial reports, and performance reports)
- Define how parties can make amendments to the agreement
- Requirement that subrecipient permit County and auditors to have access to subrecipient's records and financial statements
- Provision that authorizes monitoring the performance of the subrecipient
- Terms and Conditions concerning closeout of subawards
- Termination for cause or convenience
- Requirement that the subrecipient notify Washoe County if they become debarred or suspended
- Termination for cause or convenience
- Additional provisions imposed by County or granting department

The agreement must also advise the subrecipient of any requirements imposed on them by Federal laws, regulations, and the provisions of contracts or grant agreements.

Preparer Signature: _____ Date: _____
Name/Title:

Appendix H



**WASHOE COUNTY
SAMPLE GRANT AWARD RESOLUTION**

RESOLUTION: Authorizing grant of funds to the Food Bank of Northern Nevada

WHEREAS, NRS 244.1505 provides that a board of county commissioners may expend money for any purpose which will provide a substantial benefit to the inhabitants of the county and that a board may make a grant of money to a nonprofit organization created for religious, charitable or educational purposes, or other governmental entity, to be expended for a selected purpose; and

WHEREAS, the Board of Commissioners of Washoe County has determined that a certain amount of money is available from the U.S. Department of Housing and Urban Development, Community Development Block Grant (CDBG) States Program, CFDA #14.228, passed through the Nevada Governor's Office on Economic Development, State award number 14/PS/15, will provide a substantial benefit to the inhabitants of Washoe County;

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF WASHOE COUNTY, that the Board hereby enters into the attached Sub-Grant Agreement to provide funds to Food Bank of Northern Nevada for the purposes set forth in the attached Sub-Grant Agreement.

1. The Board hereby grants to the Food Bank of Northern Nevada, a grant in the amount of \$180,900.
2. The purpose of the CDBG Program is to provide decent housing, suitable living conditions, and expand economic development opportunities.
3. The maximum amount to be expended from the grant and the conditions and limitations upon the grant are set forth in the Sub-grant Agreement.

Adopted this 12th Day of August 2014

David Humke, Chairman
Washoe County Commission

ATTEST:

County Clerk

Appendix I



WASHOE COUNTY SUBRECIPIENT MONITORING FORM

Monthly/Quarterly Desk Monitoring

Subrecipient name: _____
Review Period: _____
County reviewer: _____
Grant number: _____
Subaward program name: _____
Subaward amount: \$ _____

The objective of subrecipient monitoring is twofold: 1) To ensure the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and terms and conditions of the award; 2) To ensure the subaward performance goals are achieved.

PREAWARD RISK DETERMINATION: High Risk Low Risk

Monthly/quarterly financial reporting and/or regular communication:

1. Were quarterly/month financial and programmatic reports required by the County received on time and complete, during this reporting period? Yes ___ No ___
2. Were any deficiencies identified during this reporting period? Yes ___ No ___
 - a. If yes, how and when was subrecipient notified of deficiency?
 - b. Action plan for addressing deficiency?
3. Were deficiencies identified during the prior reporting period? Yes ___ No ___
 - a. If yes, note current status of deficiency and action plan.
4. Were any deficiencies identified during subrecipient's last on-site monitoring?
Yes ___ No ___
 - a. If yes, was follow-up conducted to ensure subrecipient took timely and appropriate action on all deficiencies pertaining to the federal award?
Yes ___ No ___
 - b. Note current status of deficiency:

WASHOE COUNTY SUBRECIPIENT MONITORING FORM



Onsite Monitoring

SUBRECIPIENT NAME: _____

DATE OF REVIEW: _____

SUBRECIPIENT REPRESENTATIVE: _____

COUNTY REVIEWER: _____

GRANT NUMBER: _____

SUBAWARD PROGRAM NAME: _____

SUBAWARD AMOUNT: \$ _____

PREAWARD RISK DETERMINATION: High Risk Low Risk

The objective of grant monitoring is twofold: 1) To ensure the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and terms and conditions of the award; 2) To ensure the subaward performance goals are achieved.

APPLICATION/AWARD

1. Are the original application and any supplement information in the grant file?
Yes ____ No ____ N/A ____
2. Is the grant agreement in the grant file?
Yes ____ No ____ N/A ____
3. If the grant was extended, are the extensions recorded and on file?
Yes ____ No ____ N/A ____
4. Are quarterly/monthly reports on file?
Yes ____ No ____ N/A ____

MANAGEMENT & OPERATIONS

1. Are the entity's financial and/or administration management systems new or substantially changed?
Yes _____ No _____ N/A _____
Comments:
Comments:

2. Has there been high staff turnover or agency reorganization that affects this program?
Yes _____ No _____ N/A _____
Comments:

3. Has the entity been untimely in the submission of:
 - a. Applications Yes _____ No _____ N/A _____
 - b. Amendments Yes _____ No _____ N/A _____
 - c. Fiscal Reporting Yes _____ No _____ N/A _____
 - d. Draw Downs Yes _____ No _____ N/A _____
 - e. Budgets/Revisions Yes _____ No _____ N/A _____

4. Has the entity been untimely in responding to program and/or fiscal questions?
Yes _____ No _____ N/A _____
Comments:

5. Does the entity lack effective procedures and controls?
(Programmatic, eligibility, fiscal, purchasing, personnel activity reporting, etc...)
Yes _____ No _____ N/A _____
Comments:

6. Have more than three funding cycles passed since the entity had an on-site monitoring visit?
Yes _____ No _____ N/A _____
Comments:

7. Were there findings/violations in the prior visit?
Yes _____ No _____ N/A _____
Comments:

FINANCIAL MANAGEMENT

5. Is there a clear and working budget on file?
Yes ____ No ____ N/A ____
6. Were budget changes requested and approved?
Yes ____ No ____ N/A ____
- a. Is there supporting evidence of these budget change requests/approvals?
Yes ____ No ____ N/A ____
7. Has the entity frequently been untimely in the drawdown of funds?
Yes ____ No ____ N/A ____
Comments:
8. Does the file contain the supporting information for each draw request?
Yes ____ No ____ N/A ____
Comments:
9. Are there variations between expenditures and the budget?
Yes ____ No ____ N/A ____ (*large variations=higher risk*)
Comments:
10. Does the entity have a large amount of budget carryover?
Yes ____ No ____ N/A ____
Comments:
11. Is the entity on track to expend awarded funds by the end of the grant term?
Yes ____ No ____ N/A ____
Comments:
12. Does the entity consistently use a time and accounting system to track effort by cost objective?
Yes ____ No ____ N/A ____
Comments:
13. Are the entity's fiscal statistics outside of tolerance or trends (*e.g. much more expenditures on supplies than average*)?
Yes ____ No ____ N/A ____
Comments:

FINANCIAL MANAGEMENT (continued)

14. Is a Single Audit Required? Yes _____ No _____

15. If yes, then were there findings?

Yes _____ No _____

What were the number and extent of findings/violations in prior audits (more violations/more sever-higher risk), and does the entity have a corrective action plan for correcting findings?

FINANCIAL SYSTEM ASSESSMENT

1. Does the entity have a financial management system in place to track and record the program expenditures? (Example QuickBooks, Visual Bookkeeper, Socrates Media, Peachtree or a Custom Proprietary System)

Yes _____ No _____ N/A _____

Comments:

2. Does the accounting system identify the receipts and expenditure of program funds separately for each award?

Yes _____ No _____ N/A _____

Comments:

3. Does the accounting system provide for the recording of expenditures for each award by budget cost categories shown in the approved budget?

Yes _____ No _____ N/A _____

Comments:

PROGRAMMATIC ASSESSMENT

Departments using this tool should review their applicable programmatic requirements and develop questions based upon the governing compliance statutes, rules, supplements for the program; and terms and conditions for the award.

1. Did the entity meet annual measurable achievement objectives?

Yes ___ No ___ N/A _____

Comments:

2. Does the entity have a system in place for ensuring client eligibility?

Yes ___ No ___ N/A _____

Comments:

3. Are active and inactive client records stored in a secure location?

Yes ___ No ___ N/A _____

Comments:

4. Did the entity meet public participation requirements?

Yes ___ No ___ N/A _____

Comments:

5. Other criteria which are required by applicable statute/program rule.

SPECIFIC CONDITIONS: (High Risk)

1. If the subrecipient was determined to be High Risk, were any specific conditions imposed upon the subrecipient?

Yes ___ No ___ N/A _____

If Yes, What were the specific conditions?

2. Was any additional training and technical assistance provided?

Yes ___ No ___ N/A _____

Any specific conditions must be promptly removed once the conditions that prompted them have been corrected.

MONITORING COMMENTS:

Appendix J



NRS PROCEDURES FOR LOCAL GOVERNMENT PURCHASING

Procedures for Nevada local government purchasing define the following standards:

NRS 332.039 Advertisements or requests for bid on contract.

1. Except as otherwise provided by specific statute:
 - (a) A governing body or its authorized representative shall advertise all contracts for which the estimated annual amount required to perform the contract exceeds \$50,000.
 - (b) A governing body or its authorized representative may enter into a contract of any nature without advertising, if the estimated annual amount required to perform the contract is \$50,000 or less.
 - (c) If the estimated annual amount required to perform the contract is more than \$25,000, but not more than \$50,000, requests for bids must be submitted or caused to be submitted by the governing body or its authorized representative to two or more persons capable of performing the contract, if available. The governing body or its authorized representative shall maintain a record of all requests for bids and all bids received for the contract for at least 7 years after the date of execution of the contract.
2. This section does not prohibit a governing body or its authorized representative from advertising for or requesting bids regardless of the estimated annual amount required to perform the contract.

(Added to NRS by 1993, 2553; A [1999, 1682](#); [2003, 667](#); [2005, 2551](#); [2007, 496](#))

NRS 332.045 Advertisement to be by notice to bid; publication; contents of notice.

1. The advertisement required by paragraph (a) of subsection 1 of [NRS 332.039](#) must be by notice to bid and must be published:
 - (a) In a newspaper qualified pursuant to [chapter 238](#) of NRS that has a general circulation within the county wherein the local government, or a major portion thereof, is situated at least once and not less than 7 days before the opening of bids; and
 - (b) On the Internet website of the local government, if the local government maintains an Internet website, every day for not less than 7 days before the opening of bids.
2. The notice must state:
 - (a) The nature, character or object of the contract.
 - (b) If plans and specifications are to constitute part of the contract, where the plans and specifications may be seen.
 - (c) The time and place where bids will be received and opened.
 - (d) Such other matters as may properly pertain to giving notice to bid.

(Added to NRS by 1975, 1536; A 1979, 172; 1983, 1659; 1993, 2554; [1999, 1036](#); [2003, 667](#); [2005, 2552](#); [2011, 1863](#))