

Lincoln/Lancaster County Human Services Grant Guidelines

December 2020

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CHAPTER 1

PURPOSE STATEMENT AND SCOPE OF SERVICES

Lincoln/Lancaster County Human Services serves as a liaison, facilitating and advising elected officials, funding sources, and the community at-large in the areas of human services and its delivery system. Its purpose is to guide this community to respond to human needs in a collaborative, cost efficient, and expedient manner with available resources; and to assist in generating new resources when necessary.

- 1.1 **Purpose Statement of Guidelines:** To establish procedures governing the distribution and management of grants funded and administered through the Lincoln/Lancaster County Human Services Department.
- 1.2 **Scope of Grant Funding:** Applicable to non-profit agencies providing community-based services in Lincoln/Lancaster County.

“It was once said that the moral test of government is how that government treats those who are in the dawn of life, the children; those who are in the twilight of life, the elderly; and those who are in the shadows of life, the sick, the needy and the handicapped”.

- Hubert H. Humphrey

CHAPTER 2

JOINT BUDGET COMMITTEE FUNDING

Government is one of the key players in the important provision of human services for Lincoln and Lancaster County. Often times the nonprofit sector can provide those services at less cost and with greater expertise. The City and County formed the Joint Budget Committee (JBC) which oversees the distribution of city and county tax dollars for this purpose. These funds augment city/county services and assist in securing a safety net for citizens in need.

- 2.1 **Funding Amount:** This amount is between \$1,200,000 and \$1,500,000 set annually by the County Board and City Council. Minimum amount awarded is \$5,000 per program. There is no set maximum amount.
- 2.2 **Statutory Reference:** Nebraska Revised State Statutes §23-104.03 and §13-801 et seq.
- 2.3 **Funding Focus:** JBC funding is available for programs that specifically augment city/county human services with emphasis on basic and emergency needs and behavioral health. JBC funds programs in the following five strategies:

Food
Victim Safety
Shelter
Adult Behavioral Health
Youth Behavioral Health

- 2.4 **Application Process:** The Request for Proposal is released in January. Such proposal will be made available on the Human Services website at <https://www.lancaster.ne.gov/255/Human-Services>. Applications are due in early to mid-March. Funding is July 1 through June 30 for county grants and September 1 through August 31 for city grants. Funding is awarded for 2 consecutive years.

Lancaster County uses a web-based grant application. In order to apply, agencies must register an account which provides access to the online application process.

- 2.5 **Fund Matching:** Cash (non-federal) and/or In-Kind (existing contributions from the organization) match is required for this fund.

2.6 **Review Process:**

1. Preliminary review of applications is conducted by review committees consisting of stakeholders in the community who are not funded through the JBC. The two committees are Stable and Safe Communities (Food, Shelter, & Victim Safety) and Healthy Communities (Youth and Adult Behavioral Health).

2. Information from the review committees is forwarded to JBC. The JBC is composed of two members of the Lincoln City Council, two members of the Lancaster County Board of Commissioners, a representative appointed by the Lancaster County Board, and a representative appointed by the Mayor's office. The Lincoln/Lancaster County Human Services Director serves as support staff to the Joint Budget Committee. After review of the information supplied by the grant review committee, the JBC determines funding amounts. The decision to move recommendations forward is made by a majority vote of the JBC.
3. The Human Services Director presents the recommended funding amounts determined by JBC to the City Council and County Board for their final approval.
4. Agencies will be notified via the Human Services Department of the final decision. For applicants who receive funding, the notification will inform the applicant of the final status of the application and the requirement to meet any contingencies. For applicants who receive funding with no contingencies, the notification will include the contract. For applicants who were denied funding, the notification will inform the applicant of the final status of the application and the reason(s) for the denial.
5. If at any time a reviewer has a conflict of interest, he/she shall recuse themselves from participating in any discussion or vote regarding the grant application. A conflict of interest shall be determined in situations where the reviewer would be required to take any action or make any decision that may cause financial benefit or detriment to him or her, a member of his or her immediate family, or a business or organization with which he or/she is affiliated.

2.7 Acceptance of Funds & Conditions:

Applicants who are required to meet contingencies will have fifteen (15) days from the notification to satisfy the requirements. After contingencies have been approved by the Human Services Director, the applicant will be required to return the signed contract and insurance requirements within thirty (30) days. Once the contract is received, the grantee will be eligible to receive funds as outlined in the contract.

In the event that the contract is not received by the deadline, the Human Services Department will make three attempts via phone and e-mail to contact project personnel listed on the application. If contact is unsuccessful within ten (10) business days, the applicant will be considered to have withdrawn their application for funding. The Human Services Director will notify the applicant of said withdrawal.

CHAPTER 3

KENO PREVENTION FUNDING

Over 20 years ago, the City and the County formed a nine person Keno Advisory Board. At the time, the City and County agreed that 5% of the gross profits from Keno would be set aside for prevention purposes.

3.1 Funding Amount: Varies depending on Keno proceeds. This amount is usually approximately \$200,000. There is no minimum amount awarded. The maximum amount awarded is \$15,000.

3.2 Statutory Reference: Nebraska Revised State Statutes §9-629

3.3 Funding Focus: The purpose of the fund is to fund programs designed for children and families to prevent crisis situations through early intervention.

3.4 Application Process: The Request for Proposal is released in October. Such proposal will be made available on the Human Services website at <https://www.lancaster.ne.gov/255/Human-Services>. Applications are due in early to mid-November. Grant term is January 1 through December 31.

Lancaster County uses a web-based grant application. In order to apply, agencies must register an account which provides access to the online application process.

3.5 Fund Matching: Cash (non-federal) and/or In-Kind (existing contributions from the organization) match is required for this funding.

3.6 Review Process:

1. Keno applications are reviewed by the Keno Advisory Board. The Keno Advisory Board is an eight (8) member committee consisting of one (1) City Council Representative, one (1) Lancaster County Board Representative, three (3) Appointments by the Mayor and three (3) Appointments by the Lancaster County Board.
2. The Keno Advisory Board will make recommendations for funding based on the following criteria:
 - Eligibility of the applicant;
 - Completeness, clarity, continuity, and consistency of the written application. The written application shall include all sections and information as outlined in the Request for Application;
 - Ability and capacity of the proposed program to make an impact on the identified priority;

- Other resources available to address the problem, including an explanation of how the grant applicant’s proposal will work with or coordinate with existing resources;
 - Cost effectiveness of the proposed project;
 - Amount of funds available; and
 - If previously funded, the performance and ability of the applicant to manage a grant program, including the timely submission of required reports.
3. Recommendations from the Keno Advisory Board are forwarded to JBC for review and determination of amounts. The JBC is composed of two members of the Lincoln City Council, two members of the Lancaster County Board of Commissioners, a representative appointed by the Lancaster County Board, and a representative appointed by the Mayor’s office. The Lincoln/Lancaster County Human Services Director serves as support staff to the Joint Budget Committee. The decision to move recommendations forward to the Lincoln City Council and the Lancaster County Board is made by a majority vote of the JBC.
 4. The Human Services Director presents the recommended funding amounts determined by JBC to the City Council and County Board for their final approval.
 5. Agencies will be notified via the Human Services Department of the final decision. For applicants who receive funding, the notification will inform the applicant of the final status of the application and the requirement to meet any contingencies. For applicants who receive funding with no contingencies, the notification will include the contract. For applicants who were denied funding, the notification will inform the applicant of the final status of the application and the reason(s) for the denial.
 6. If at any time a reviewer has a conflict of interest, he/she shall recuse themselves from participating in any discussion or vote regarding the grant application or appeal hearings. A conflict of interest exists in situations where the reviewer would be required to take any action or make any decision that may cause financial benefit or detriment to him or her, a member of his or her immediate family, or a business or organization with which he or/she is affiliated.

3.7 Acceptance of Funds & Conditions:

Applicants who are required to meet contingencies will have fifteen (15) days from the notification of application approval to satisfy the requirements. After contingencies have been approved by the Human Services Director, the applicant will be required to return the signed contract and insurance requirements within thirty (30) days. Once the contract is received, the grantee will be eligible to receive funds as outlined in the contract.

In the event that the contract is not received by the deadline, the Human Services Department will make three attempts via phone and email to contact project personnel listed on the application. If contact is unsuccessful within ten (10) business days, the applicant will be considered to have withdrawn their application for funding. The Human Services Director will notify the applicant of said withdrawal.

CHAPTER 4

JUVENILE JUSTICE FUNDING

4.1 Comprehensive Juvenile Services Community Plan: To be eligible for funding under the Nebraska Crime Commission Grant Program or the Juvenile Services Aid Program, a county must adopt a comprehensive juvenile services plan in accordance with Nebraska Revised State Statute §43-2404.01. This document is created by the community planning team, passed by a majority vote of the Juvenile Justice Review Committee and approved by the Lancaster County Board. It covers three years of planning for juveniles within the identified community. The comprehensive juvenile services plans shall:

(a) Be based on data relevant to juvenile and family issues; (b) Identify policies and practices that are research-based or standardized and reliable and are implemented with fidelity and which have been researched and demonstrate positive outcomes; (c) Identify clear implementation strategies; and (d) Identify how the impact of the program or service will be measured. All juvenile justice funding requests must address priorities and/or strategies set forth in the Lancaster County Comprehensive Juvenile Services Community Plan.

4.2 Funding Sources:
The following funding is administered through the Nebraska Crime Commission. Lancaster County is the applicant/grantee of such funding and subcontracts with agencies to provide direct services.

1. Community Aid: Pursuant to Nebraska Revised Statutes §43-2404.02, Community Aid is administered through the Nebraska Crime Commission. It is a predetermined amount based on the County's juvenile population. The Juvenile Justice Review Committee is instrumental in determining who is funded.

Funding Available: Approximately \$900,000 for Lancaster County as set during the State's biennium budget process.

Purpose: Funds received through the Community-based Juvenile Services Aid Program shall be used exclusively to assist the aid recipient in the implementation and operation of programs or the provision of services identified in the aid recipient's comprehensive juvenile services community plan, including:

- programs for local planning and service coordination;
- screening, assessment, and evaluation;
- diversion;
- alternatives to detention;
- family support services;
- treatment services;
- truancy prevention and intervention programs;

- pilot projects approved by the commission;
- payment of transportation costs to and from placements, evaluations, or services;
- personnel when the personnel are aligned with evidence-based treatment principles, programs, or practices;
- contracting with other state agencies or private organizations that provide evidence-based treatment or programs;
- pre-existing programs that are aligned with evidence-based practices or best practices; and
- other services that will positively impact juveniles and families in the juvenile justice system.

Funding Cycle: Request for Proposals is usually released in October. Applications are due in January. Grant term is July 1 through June 30.

2. Community Aid Enhancement: Pursuant to Nebraska Revised Statutes §43-2404.02, Community Aid Enhancement is administered through the Nebraska Crime Commission. Community Aid Enhancement is competitive.

Funding Available: Fluctuates annually

Purpose: Funds received through the Community-based Juvenile Services Aid Enhancement Program shall be used exclusively to assist the aid recipient in the implementation and operation of programs or the provision of services identified in the aid recipient's comprehensive juvenile services community plan, including:

- programs for local planning and service coordination;
- screening, assessment, and evaluation;
- diversion;
- alternatives to detention;
- family support services;
- treatment services;
- truancy prevention and intervention programs;
- pilot projects approved by the commission;
- payment of transportation costs to and from placements, evaluations, or services;
- personnel when the personnel are aligned with evidence-based treatment principles, programs, or practices;
- contracting with other state agencies or private organizations that provide evidence-based treatment or programs;
- pre-existing programs that are aligned with evidence-based practices or best practices; and
- other services that will positively impact juveniles and families in the juvenile justice system.

Funding Cycle: Request for Proposals is usually released in October. Applications are due in January. Grant term is July 1 through June 30.

3. Juvenile Services: Pursuant to Nebraska Revised Statutes §43-2408, Juvenile Services state funding is competitive funding appropriated by the legislature and awarded annually by the Nebraska Crime Commission.

Funding Available: Approximately \$500,000 statewide as set during the State's biennium budget process.

Purpose: The Juvenile Services Act was enacted to assist communities in the implementation and operation of needed programs or services for youth as identified in their Comprehensive Juvenile Services Plan, including, but not limited to, programs for:

- assessment/evaluation;
- prevention of delinquent behavior;
- diversion and other alternatives to detention;
- shelter care;
- intensive juvenile probation services;
- restitution;
- family support services; and
- community centers for the care and treatment of juveniles in need of services.

Priority areas are:

- Mental Health Services;
- Diversion;
- School Programs;
- Gender Specific Programs;
- Delinquency Prevention;
- Alternatives to Detention; and
- Disproportionate Minority Contact-DMC.

Funding Cycle: Request for Proposals is usually released in November. Applications are due in January. Grant term is July 1 through June 30.

4. Office of Violence Prevention: Pursuant to Nebraska Revised Statutes §81-1450 this funding gives priority to communities and organizations seeking to implement violence prevention programs that reduce street and gang violence, homicides and injuries caused by firearms, and the creation of youth employment opportunities in high-crime areas.

Funding Available: Approximately \$800,000 Statewide as set during the State's biennium budget process.

Purpose: The Office of Violence Prevention was created to help develop, foster, promote and assess violence prevention programs in the State of Nebraska. The Office of Violence Prevention (OVP) aids privately funded organizations, local government subdivisions, and other community advocacy groups in developing proven and cutting-edge prevention, intervention, and enforcement strategies and techniques.

Funding Cycle: Request for Proposals is usually released in November. Applications are due in January. Grant term is July 1 through June 30.

The following funding is through Lancaster County General Funds:

5. **Juvenile Justice Prevention Funds:** Lancaster County has set aside prevention funding to provide services to youth at risk of entering or re-entering the juvenile justice system.

Funding Available: Approximately \$400,000 set annually by the County Board. No minimum or maximum amount.

Purpose: Priority has been given to:

- youth ages 17 and under who are or have been involved in our juvenile justice system;
- youth with high truancy rates, at risk of dropping out of school;
- homeless youth without structure in their lives to enable them to become productive adults; and
- youth at risk of being removed from school due to documented behavioral issues.

Funding Cycle: Request for Proposals is released in April. Applications are due in early to mid-May. Grant term is July 1 through June 30.

- 4.3 **Application Process:** Anyone interested in applying for juvenile justice funding through the Juvenile Justice Review Committee is required to submit a Letter of Intent prior to the November Juvenile Justice Review Committee grants meeting. This Letter of Intent shall include a brief description of the program, funding requested, and priority the program will address. The Letter of Intent form will be available on the Human Services website at <https://www.lancaster.ne.gov/255/Human-Services> in September.

Lancaster County uses a web-based grant application. In order to apply, agencies must register an account which provides access to the online application process.

- 4.4 **Fund Matching:** Cash (non-federal) and/or In-Kind (existing contributions from the organization) match is required for Juvenile Services, Office of Violence Prevention Funding, and Juvenile Justice Prevention Funding. The Human Services Director will work with agencies to establish the required match in both Community Aid and Community Aid Enhancement.

4.5 Review Process:

1. All Letters of Intent are reviewed by the Juvenile Grants Review Committee. This committee is composed of the Lincoln/Lancaster County Juvenile Justice Coordinator, Chief Deputy County Attorney of the Lancaster County Attorney's Office, Chief Deputy Public Defender of the Lancaster County Public Defender's Office, Director of the Lancaster County Youth Services Center, Chief Juvenile Probation Officer of the District 3J Juvenile Probation Office, Captain of Lincoln Police Department, Health and Human Services Administrator, and Director of Student Services for Lincoln Public Schools.
2. The Juvenile Grants Review Committee will make recommendations to the Juvenile Justice Review Committee for submission of the grant application based on the following criteria:
 - Eligibility of the applicant;
 - Adherence to federal and state requirements and guidelines;
 - Completeness, clarity, continuity, and consistency of the written application. The written application shall include all sections and information as outlined in the Request for Application;
 - Ability and capacity of the proposed program to make an impact on the identified problem and comprehensive juvenile services community planning priorities;
 - Other resources available to address the problem including an explanation of how the grant applicant's proposal will work with or coordinate with existing resources;
 - Cost effectiveness of the proposed project;
 - Amount of funds available; and
 - If previously funded, the performance and ability of the applicant to manage a grant program, including the timely submission of required reports to the Commission.
3. The Juvenile Justice Review Committee determines the suggested level of funding and if the agency should apply under Community Aid, Community Aid Enhancement, Juvenile Services, Office of Violence Prevention, or Juvenile Justice Prevention Funds through a majority vote.
 - A. For Community Aid, Community Aid Enhancement, Juvenile Services, Office of Violence Prevention:

The Human Services Director presents the recommended funding amounts determined by the Juvenile Justice Review Committee to the County Board for their final approval to submit the grant application to the Crime Commission.

The decision to fund these grants is determined by the Nebraska Crime Commission. Once the Human Services Department receives notification on funding decisions, agencies will be notified via the Human Services Department of the final decision. For applicants who receive funding, the notification will inform the applicant of the final status of the application and the requirement to meet any contingencies. For applicants who receive funding with no contingencies, the notification will include the contract. For applicants who were denied funding, the notification will inform the applicant of the final status of the application and the reason(s) for the denial.

B. For Juvenile Justice Prevention Funds:

The Juvenile Grants Review Committee determines the suggested level of funding through a majority vote. Recommendations from the Juvenile Grants Review Committee are forwarded to JBC for review and determination of funding amounts.

The JBC is composed of two members of the Lincoln City Council, two members of the Lancaster County Board of Commissioners, a representative appointed by the Lancaster County Board, and a representative appointed by the Mayor's office. The Lincoln/Lancaster County Human Services Director serves as support to the Joint Budget Committee. The decision to move recommendations forward to the Lincoln City Council and the Lancaster County Board is made by a majority vote of the JBC. The Human Services Director presents the recommended funding amounts determined by JBC to the County Board for their final approval.

4. Agencies will be notified via the Human Services Department of the final decision. For applicants who receive funding, the notification will inform the applicant of the final status of the application and the requirement to meet any contingencies. For applicants who receive funding with no contingencies, the notification will include the contract. For applicants who were denied funding, the notification will inform the applicant of the final status of the application and the reason(s) for the denial.
5. If at any time a reviewer has a conflict of interest, he/she shall recuse themselves from participating in any discussion or vote regarding the grant application or appeal hearings. A conflict of interest exists in situations where the reviewer would be required to take any action or make any decision that may cause financial benefit or detriment to him or her, a member of his or her immediate family, or a business or organization with which he or/she is affiliated.

4.6 Acceptance of Funds & Conditions:

Applicants who are required to meet contingencies will have fifteen (15) days from the notification of application approval to satisfy the requirements. After contingencies have

been approved by the Human Services Director, the applicant will be required to return the signed contract and insurance requirements within thirty (30) days. Once the contract is received, the grantee will be eligible to receive funds as outlined in the contract.

In the event that the contract is not received by the deadline, the Human Services Department will make three attempts via phone and email to contact project personnel listed on the application. If contact is unsuccessful within ten (10) business days, the applicant will be considered to have withdrawn their application for funding. The Human Services Director will notify the applicant of said withdrawal.

CHAPTER 5

STATE and FEDERAL FUNDING

Lancaster County will work with community partners to apply for federal and state grants collaboratively. In the event the County, as a recipient or pass-through entity of a federal or state grant award, determines that the organization receiving funds meets the characteristics of a subaward or contractor recipient as defined in Part 200.330 (a), Human Services will ensure compliance with all applicable federal regulations. Agencies that are debarred or suspended are ineligible for any federal or state funding. If Lancaster County serves in any administrative or fiscal capacity in administering said grants, rates under the Lancaster County's established indirect cost plan will be applied.

5.1 Suspension and Debarment:

Prior to drafting any contracts, the Grants Coordinator will check the System for Award Management website to ensure the subrecipient is not suspended or debarred by the federal government. This website will be checked annually and/or prior to each contract renewal period, whichever comes first. The Grants Coordinator in the Human Services Office will maintain a log for each grant administered. Such log will include: date of check, any findings, and initials of person who ran the check.

5.2 Contracts:

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.

1. Contractor Classification

As determined in CFR 200.331 characteristics indicative of a procurement relationship between the non-federal entity and a contractor are when the contractor:

- 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; 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.

2. Contractor Roles and Responsibilities

Any agency deemed to be a contractor will adhere to the policy and procedures as outlined in the *City of Lincoln and Lancaster County Federal Procurement Manual rev 11/20/20*.

5.3 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. Lancaster County Human Services will initiate, develop, secure approval, monitor, report and monitor services provided by organizations receiving federal or state grant funding in accordance with federal

guidance, including Title 2 of the Code of Federal Regulations (2 CFR), Part 200.330 and the Federal Funding Accountability and Transparency Act (FFATA).

1. Subrecipients Classification

As defined in CFR 200.331 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 assistance;
- Has performance measured in relation to whether objectives of a Federal program are met;
- Has responsibility for programmatic decision making;
- Is responsible for adherence to applicable Federal program requirements specified in the federal award; and
- Uses the federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

2. Subrecipient Contract Requirements & Special Conditions

Lancaster County Human Services will ensure every subaward is clearly identified to the subrecipient as a subaward and include the following information found in D.F.R. 200.303 and 200.331 in the subaward agreement or contract at the time of the subaward. If any of these data elements change, the County will issue and amendment. The County agreement/contract includes:

A. Federal Award Identification

- Subrecipient name (which must match the name associated with its unique entity identifier);
- Subrecipient's unique entity identifier;
- Federal Award Identification Number (FAIN);
- Federal Award Date (the date of award to the recipient by the Federal agency);
- Subaward Period of Performance Start and End Date;
- Amount of federal funds obligated by the County to the subrecipient;
- Total Amount of federal funds obligated to the subrecipient including the current obligation;
- Total amount of the federal award committed to the subrecipient;
- Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);
- Name of federal awarding agency, pass-through entity, and contact information for awarding official of the pass-through entity;
- CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement;
- 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); and
- Identified risk level with associated financial and program monitoring.

B. Requirements to ensure that the federal award is used in accordance with federal statutes, regulations and the terms and conditions of the federal

award;

- C. An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government or, if no such rate exists, either a rate negotiated between the County and the subrecipient or a de minimis indirect cost rate as defined in Federal regulations.
- D. A requirement allowing the County to have access to the subrecipient's records and financial statements as necessary for the County to meet the federal requirements;
- E. Clear outline of applicable federal special conditions passed down to the subrecipient;
- F. Expectation of collecting relative performance data measures and associated outcome measured identified in the grant;
- G. Appropriate terms and conditions concerning closeout of the subaward; and
- H. Additional requirements in order for the County to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports.

3. Subrecipient Post Award

Within 30 days of the subrecipient receiving the fully executed contract, the following activities will be completed:

A. Federal Funding Accountability and Transparency Act: Sub-award Reporting System

In accordance with 2 CFR Chapter 1, Part 170 REPORTING SUB-AWARD AND EXECUTIVE COMPENSATION INFORMATION, Prime Awardees awarded a federal grant are required to file a FFATA subaward report by the end of the month following the month in which the prime awardee awards any sub-grant equal to or greater than \$25,000. The reporting requirements are as follows:

- All subaward information must be reported by the prime awardee.
- For those new Federal grants as of October 1, 2010, if the initial award is equal to or over \$25,000, reporting of subaward and executive compensation data is required.
- If the initial award is below \$25,000 but subsequent grant modifications result in a total award equal to or over \$25,000, the award will be subject to the reporting requirements, as of the date the award exceeds \$25,000.
- If the initial award equals or exceeds \$25,000 but funding is subsequently de-obligated such that the total award amount falls below \$25,000, the award continues to be subject to the reporting requirements of the Transparency Act and this Guidance.
- Within thirty (30) of the determination of a subaward relationship, the Grants Coordinator will report the subaward to the Federal Subaward Reporting System. <https://www.fsrs.gov/>.

B. Training

The Human Services Administrator and Grants Coordinator will meet with the Project Coordinator and Fiscal Point of Contact (FPOC) from the subrecipient agency. The agency is welcome to have additional staff attend as needed so long as

the Project Coordinator and FPOC are in attendance. The training will incorporate:

- Thorough review of the contract requirements and special conditions.
- Fiscal responsibility to include documentation needed, review of requirements for payroll, program income, process and forms for reimbursement, and length of time to store grant files.
- Program specific requirements including but not limited to: program narrative semi-annual reporting, confidential tracking of program participants, and process to ensure accurate data collection needed for performance measures.

C. Risk Assessment for Contacted Agencies

The Human Services Administrator and Grants Coordinator will evaluate each subrecipient's risk of noncompliance with federal statutes, regulations and the terms and conditions of the subaward for purposes of determining appropriate subrecipient monitoring using the *Risk Assessment for Contracted Agencies*. A copy of this will be kept in the subaward grant file with the Grant Coordinator.

D. Monitoring

The Human Services Department will perform on-site reviews of each subrecipient to ensure that 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. County monitoring of the subrecipient include reviewing financial and performance reports as required by the County and following-up to ensure that the subrecipient takes timely and appropriate action on all deficiencies identified via site visit or audits.

Each fiscal year the Grants Coordinator will prepare a monitoring plan for current subrecipients. Such plan will be presented to the Human Services Administrator. The plan will include the agencies requiring monitoring, type of monitoring, and the timeframe for the monitoring. Subrecipients will be notified 30 days prior to the monitor. The following actions will be followed in monitoring grants:

- Monitoring guidance shall reflect the specific grant risk level requirements of the award along with compliance to Federal Open Government Directives.
- Monitoring guidance will be maintained within the designated agency grant folder along with copies of the grant submission, signed grant award, federal grant requirements document, executed contract, financial status reports, budget and drawdown activity, performance data, FFATA submission, and other documentation as required.
- Consideration whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments.
- On-site visits will be conducted by a monitoring team comprised of the Human Services Administrator (Role: Grant requirements/processes and award requirements/compliance), and the Grants Coordinator (Role: Financial)

- County staff will utilize the *Grant Monitoring Form* as guidance to effectively monitor the subaward recipient and ensure knowledge and compliance with county, state, and federal and grant requirements.

E. Findings

Subrecipients will be given 30 days to address any needed corrections found during the monitor. All corrections will be presented in writing on the *Grant Monitoring Form*. The subrecipients is expected to return the corrections in writing to the Grants Coordinator. If needed action is not taken by the established deadline, the agency will be prohibited from drawing down funds. If the action is not corrected within 90 days, the subaward and associated contract may be terminated.

F. Audit and Audit Findings

The Grants Coordinator will verify that every subrecipient is audited when it is expected that the subrecipient's federal awards expended during the respective fiscal year equaled or exceeded the federally established thresholds.

- Subaward recipients are required to provide all program audits to the County for review within thirty (30) days of receipt.
- All findings within an audit will require follow-up by the County in writing to obtain resolution and ensure compliance.
- Subaward recipients must document progress and resolution to audit findings in writing to the County in order to continue to receive subaward funding. Resolution must be demonstrated to the County's satisfaction.
- All audits and subsequent findings will be maintained in the grants folder.

4. Subrecipient Closeout

Ninety days prior to the grant closing, the Human Services Administrator will contact the Project Coordinator to ensure the following:

- All funding will be spent in accordance with the approved budget;
- Final program report will be prepared and presented to the Human Services Administrator prior to the grant closing;
- Performance measure data will be completed, and a final performance report will be submitted per the reporting requirements; and
- Subrecipient will submit a quarterly financial status report as well as a financial reconciliation no later than 45 days after the close of the grant.

APPENDIX A

SUBRECIPIENT OR CONTRACTOR DETERMINATION CHECKLIST (FEDERAL AWARDS ONLY)

Name of Subawardee: _____

CHECKLIST OF QUESTIONS (Complete both lists to ensure accuracy)

SUBRECIPIENT – Check the boxes below if the answer to the question is “yes”. (*“Yes” indicates the awardee has the characteristics of a Subrecipient*). Per 2 CFR 200.93, “Subrecipient” means a non- Federal entity (subawardee) that receives a subaward from a pass-through entity (prime awardee) to carry out part of a Federal program/project, but does not include an individual that is a beneficiary of such a program/project. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Check if “Yes”	Will the Awardee:
	Determine who is eligible to receive what federal financial assistance?
	Have its performance measured in relation to whether the objectives of the federal program/project was met?
	Have responsibility for programmatic decision-making?
	Have responsibility for adherence to applicable federal program requirements specified in the federal award?
	In accordance with its subaward, use the federal funds to implement a program/project for a public purpose specified in an authorizing statute, as opposed to providing goods or services for the benefit of the county?

CONTRACTOR – Check the boxes below if the answer to the question is “yes”. (*Under this list “Yes” indicates the awardee has the characteristics of a Contractor*). Per 2 CFR 200.23, “Contractor” means an awardee that receives a contract as defined in 2 CFR 200.22 Contract. Per 2 CFR 200.92, “Contract” is defined as a legal instrument by which a non-federal entity (awardee) obtains goods and 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).

Check if “Yes”	Does the Contractor:
	Provide the goods and services within normal business operations?

Check if "Yes"	Does the Contractor:
	Provide similar goods and services to many different purchasers?
	Normally operate in a competitive environment?
	Provide goods or services that are ancillary (secondary) to the operation of a federal program?
	Fall under the compliance requirements of the Federal program as a result of the agreement (though similar requirements may apply for other reasons)?

Based on checklist results, the awardee characteristics under the two checklists above indicate the Subawardee is a *(Circle one)*: **SUBRECIPIENT** or **CONTRACTOR**

Explanation for Decision (As Needed): _____

Grants Coordinator Name: _____

Signature: _____ Date: _____

Human Services Director: _____

Signature: _____ Date: _____

APPENDIX B

RISK ASSESSMENT WORKSHEET

Subrecipient/Contractor/Vendor: _____

Grant Agreement #: _____

Project Title: _____

Contract #: _____

RAW Performed By: _____

County Strategic Plan #: _____

Risk Categories	Criteria	Scale (Check the appropriate rating scale for each question)				Comments
		High	Medium	Low	N/A	
Complexity of Project/Program	Is the project/program unusually complex? What is the potential for implementation problems?	<i>(Highly Complex)</i>		<i>(Not Complex)</i>		
Number of Programs Funded	Are there multiple programs funded with one subrecipient/contractor?	<i>3 or more programs</i>	<i>2 programs</i>	<i>1 program</i>		
Dollar Amount of Award	What is the dollar amount of the award to the subrecipient/contractor per year?	<i>(Over \$500,000)</i>	<i>(Between \$150,000 and \$500,000)</i>	<i>(Less than \$150,000)</i>		
Match Funding	Does the subrecipient provide match funding? (Cash or in-kind)	Yes		No		
Organization Certifications	Is subrecipient/contractor properly licensed or certified by a recognized source and documentation provided (i.e. Non-profit status, bonded and insured, etc)?	<i>(No)</i>	<i>(Yes - ask for)</i>	<i>(Yes - on file)</i>		
	Is subrecipient/contractor on the Federal HHS Suspension & Debarment List (date checked)	<i>(Yes)</i>		<i>(No)</i>		

Risk Categories	Criteria	Scale (Check the appropriate rating scale for each question)				Comments
		High	Medium	Low	N/A	
Experience and Staffing	Does subrecipient/contractor have experience managing federal/state grants and/or programs?	(New)		(Experienced)		
	Does the subrecipient/contractor have experience in performing stated activities of award/contract?	(No experience)	(Less than 5 years experience)	(5+ Years Experience)		
	Has the subrecipient/contractor experienced substantial change to its key management or control systems in the prior year? If so, document how this could affect federal programs.	(Yes)		(No)		
Performance (to be completed six (6) months post contract)	Does the subrecipient/contractor operate within the defined scope?	(No)		(Yes)		
	Does the subrecipient/contractor have written performance outcomes in the contract/agreement?	(No)	(Program Only; not contractor specific)	(Yes)		
	How often are Program Outcomes Reports or grant reports submitted?	(Annually)	(Bi-annually)	(Quarterly/Monthly)		
	How often is the Quality Assurance Team reviewing Program Outcomes report?	(Annually)	(Bi-annually)	(Quarterly/Monthly)		
	Has the subrecipient/contractor been timely in their submission of Program Outcomes Reports?	(No)		(Yes)		
	Has the subrecipient/contractor been timely in their submissions of invoices?	(No)		(Yes)		
	Has the subrecipient/contractor been timely in their request/ submission of Amendments to the Contract?	(No)		(Yes)		

Risk Categories	Criteria	Scale (Check the appropriate rating scale for each question)				Comments
		High	Medium	Low	N/A	
Site Monitoring	Has the subrecipient/contractor had a monitoring visit by the County within the past year.	(No)	(Yes- corrections needed)	(Yes – no corrections needed)		
Financial <i>(to be reviewed by Business Services)</i>	Single Audit performed with last two years?	(No)		(Yes)		
	Timely single audit report?	(No)		(Yes)		
	Single Audit's opinion on major program compliance?	(Adverse/ disclaimer)	(Qualified)	(Unqualified)		
	Number of significant deficiencies in internal control over compliance?	(More than 2 deficiencies)	(1-2 deficiencies)	(None)		
	Has subrecipient/contractor taken appropriate & timely action to remedy prior findings?	(No)		(Yes)		
	Did Business Services identify areas of concern on annual audit?	(Yes)		(No)		
Other Risk Review Questions	Are we aware of any findings for non-compliance by other agencies (Licensing Board State, Local, Private Foundations)	(Aware)		(Not Aware)		
	Has the subrecipient/contractor reported any incidents as defined in the contract in the last twelve (12) months.	(Yes- corrections needed)	(Yes – no corrections needed)	(No)		
	HIPAA: Is the subrecipient a "covered entity?" If no, Does the subrecipient/contractor have a signed BAA on file?	(No BAA on file)	(No- Covered Entity; Yes- BAA)	(Yes - Covered Entity and/ or BAA on file)		

Criteria Definitions/Explanations

Complexity of the Project Criteria

- 1) Program Requires Matching Funds
- 2) Multiple Program Partners/Contractors/Subrecipients
- 3) Research/Evaluation Components
- 4) New or Pilot Program (not new or continued funding for a current program)
- 5) Involves one or more local board or political system (HLB, PSCC, 6th Judicial Circuit)
- 6) 2 or more program-related committees or regular (no less than quarterly) meetings

0 Elements: Not Complex
1-2 Elements: Moderately Complex
3 or More Elements: Highly Complex

Suspensions/Debarments

Information: https://www.sam.gov/sam/transcript/Public_-_Identifying_Excluded_Entities.pdf

Searchable Database: <http://sam.gov>

Key Management (Over the Program)

Local Executive Leadership (local CEO, CFO, COO, or Directors)

Key Program Management Staff (Program Manager, Lead or Key Case Managers, Supervisors)

Administrative Oversight (primary accounting or reporting point of contact)

Substantial change includes change in any of the listed employees within the last 12 months

Incidents (see contract language)

Incidents which may reasonably be considered to jeopardize its capability to continue to meet its obligations under the terms of this Agreement. Incidents may include, but are not limited to, those resulting in injury, media coverage or public reaction that may have an impact on the AGENCY's or COUNTY's ability to protect and serve its participants, or other significant effect on the AGENCY or COUNTY.

Risk Assignment

HIGH	MEDIUM	LOW
<p>Agency is required to provide 100% supporting documentation for ALL following expenses (federal and match) with every reimbursement.</p> <p>Agency will receive a minimum of 1 full financial and program monitor every year.</p>	<p>Agency is required to provide supporting documentation for the following expenses (federal and match) with every reimbursement:</p> <ul style="list-style-type: none"> a. Payroll (wages, payroll taxes) b. Client assistance expenses <p>In general, agencies will receive a minimum of one desk review each fiscal year to review at least two full months of all reimbursements with complete supporting documentation. Staff will use their professional judgement and experience working with agencies to determine the frequency and intensity of additional monitoring.</p> <p>Agency will receive a minimum of 1 full financial and program monitor every two years.</p>	<p>Agency is required to provide supporting documentation upon request.</p> <p>In general, agencies will receive one desk review each fiscal year to review at least two full months of all reimbursements with complete supporting documentation. Staff will use their professional judgement and experience working with agencies to determine the frequency and intensity of additional monitoring.</p> <p>Agency will receive a minimum of 1 full financial and program monitor every three years.</p>

APPENDIX C

Lancaster County Grant Monitoring Form

Date of Monitor:		Date of Report:	
Type of Monitor <input type="checkbox"/> On-site Desk Review Other (specify):			
AGENCY NAME:			
Program/Project Name:			
Location (on-site visit):			
GRANTS REVIEWED (list grant #s):			
Monitoring Assessment Scores			
Completed By:			

Agency Personnel in Attendance:	
NAME	TITLE
Lancaster County Personnel in Attendance:	
NAME	TITLE

I. Monitor Preparation				
	Yes	No	N/A	Comment
Compliant with Training?				
Financial billing status current?				
Any outstanding issues?				
Supporting Documentation - Following documents should be provided prior to the monitor:				
	Yes	No	N/A	Comment
Articles of Incorporation				
By-laws				
Mission Statement				
Organizational Chart -				
Board of Directors listing (minutes will be reviewed on-site)				
Federal Civil Rights Form (completed/self-reported)				

Survey Tools & Survey Protocols (Consumer Satisfaction Survey)				
Personnel Policies				
Grievance Policy (Employee)				
Grievance Policy (Client)				
Training Curriculum				
Record of training for staff/volunteers				
Program Brochure(s)				
LEP Plan				
Anti-Discrimination Policy (Employee)				
Anti-Discrimination Policy (Client)				
Drug-Free Workplace Policy				
New or Updated Job Descriptions				
Financial & Accounting Policies				
Contracts - Subawards				
Procurement Policy or Procedure				
Travel Policy				
Whistle Blower Policy				
Record Retention Policy				
Other:				
Other:				

NOTE: All remaining sections of this report will be completed through information reviewed during on-site visits or desk review processes.

II. Agency / Program Profile				
	Y	N	NS	NA
The program(s) can describe/substantiate the purpose of the grant funded services?				
The program(s) can verify the client population served.				
The program(s) can verify the geographic area served.				
The program(s) can describe the services and needs in its community, including demographics and underserved populations.				
The program(s) can describe other resources in the community that support/assist victims.				
The program(s) can address collaborative efforts being made with other stakeholders in the community.				
The program(s) is able to address barriers/challenges in collaborative efforts with other stakeholders.				
The program(s) is able to identify the gaps/barriers in services and plans to address such gaps/barriers.				
The program(s) can describe survey methods used to improve funded activities.				
The program(s) can describe any other means utilized to ensure high quality funded services.				

Comments:

III. Program(s) Timetables and Statistics				
	Y	N	NS	NA
Agency can provide an overview of the current deliverables of its grant funded program(s).				
The timetable, goals & objectives accurately reflect services being provided.				

Able to verify the number of clients served by the grant during the most recent grant reporting period.				
Quantity of services offered (frequency of visits; length of sessions; length of service delivery).				
Program(s) can describe barriers or special circumstances affecting goals and objectives.				
Program has a system in place to track required data.				
Data reports are submitted accurately and in a timely manner.				
Activity Summaries are submitted in a timely manner.				

Comments :

IV. Personnel - (focus on grant funded and match supported positions)				
	Y	N	NS	NA
Personnel records are maintained that include job application, resume, background checks, performance appraisals, etc.				
Employees are provided written job descriptions that accurately reflect responsibilities and duties.				
New employees are trained on agency policies and procedures.				
Training records indicate professional development opportunities are offered on a regular basis.				
Project staff have an understanding of the grant program and are conducting allowable grant activities.				
Supervision is provided to staff on a regular basis.				
Employees receive annual performance appraisals. New employees have a six-month review and annual performance appraisals thereafter.				
Agency has a written grievance procedure for employees.				
Personnel policies address fringe benefits, OT, leave, travel, etc.				
Agency has policies that comply with Federal wage and hour laws. Check for the display the following six posters at each work place location with one or more employees. FLSA Minimum Wage Employee Polygraph Protection OSHA FMLA USERRA EEO-Addressed on Personnel Policy				
Special Conditions: Employees are informed in writing of their rights and remedies regarding discrimination as a reprisal for the disclosure of information related to gross mismanagement of federal grants, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant as indicated under 41U.S.C. 4712				

Comments:

V. Grant Requirements/Conditions				
	Y	N	NS	NA
Agency has a written grievance procedure for clients				
Program(s) use brochures/pamphlets, which accurately reflects services provided for outreach efforts. Agency website and written materials include grant funded activities.				
Grant funded materials include the required funding language.				
Special Conditions:				

Confidentiality:				
Agency has a written confidentiality policy that all clients are informed of.				
Agency has a written consent to release information that indicates to whom information can be released, type of information to be released and an appropriate expiration date.				
Agency documents compliance with confidentiality and privacy provision for minors who are permitted by law to receive services without parent or guardian consent to authorize release of information without parent or guardian consent.				
Client records are kept in a secure and confidential location.				
Office space includes areas that are confidential and safe.				

Comments:

VI. Internal Controls

Accounting System:	Y	N	NS	NA
Which best describes the agency's accounting system (circle): Manual Automated Combined				
Is your accounting method (circle): Cash Accrual				
Agency has written financial/accounting policies and procedures in accordance with Federal Financial Requirements i.e (Personnel, Travel, Separation of Duties, Internal Controls. Etc.) Where are these policies? Can we have a copy?				
Agency tracks leave earned by employee and funding source based on actual time worked or allocation?				
How is the agency reimbursed for employee leave time (vac., sick, holiday, etc.)? (circle one) Cash (reimbursed when the employee uses the time) Accrual (reimbursed when the employee earns the time)				
Checks are signed by two authorized agency representatives.				
There is a clear audit trail for each source of funding for each fiscal budget period.				
Identifies the receipt and expenditure of program funds separately for each grant.				
Agency has separation of duties in place to ensure that the person approving the expense is not the same person recording the expense or making the payment a. Who approves expenses: b. Who records expenses: c. Who makes payments:				
	Y	N	NS	NA
Agency has all required documents in grant file organized and logical. (Budget, Award Documents, Sub-grant Adjustments, essential correspondence, reports, Expenditures				
Records expenditures for each grant/contract by budget cost categories shown in the approved budget.				
Documents match for each grant with proper reference to supporting vouchers or bills properly approved.				
Hourly timesheets describe work activity are signed by the employee and supervisor and document hours personnel worked on grant related activities. Match hours are documented in same manner.				
Agency's compliant with Single Audit requirement (completed annually if received more than \$750,000 in federal funding				

during agencies last FY). Note: It is recommended that agencies not required to have a Single Audit, undergo an audit every three years.				
Has one copy of the audit and letter of findings been sent to the Crime Commission?				
Special Conditions: Subrecipients will maintain time records that comply with the Office of Management and Budget (OMB) A-87 Circular to clearly document the hourly activity of each grant funded or match funded position to show the actual percentage of time charged to the funding source. Records will be maintained by the subrecipient to document any differences between budgeted and actual federal and match personnel grant costs. Timesheets for grant funded positions should include the signature of the employee and their supervisor. Volunteer positions used as match are to be documented and, to the extent feasible, supported by the same methods used for employees. Refer to the following website for further details on the guidelines on accounting for personnel and other cost principles: http://ojp.gov/financialguide/DOJ/pdfs/2015_DOJ_FinancialGuide.pdf				
Indirect Cost:				
Agency has federally approved indirect cost rate and paperwork is current.				
Agency uses a 10% de minimis rate and has provided: (1) list of administrative cost items and the corresponding cost of each item; (2) copy of the agency's written allocation policy for the costs; and (3) written certification that agency has never had a federally approved indirect cost rate agreement.				
Agency has documented evidence of indirect costs or de minimis costs.				
Income Ledger:				
Agency has control mechanisms in place to adequately safeguard financial records.				
Agency has policies in place for handling checks written by the agency. A. Checks payable to "Cash" are prohibited B. Checks are not made out to the person signing the check				
How is income handled: How are receipts recorded: Are checks endorsed immediately upon receipt, by whom? Are deposits made in a timely manner (one working day) by whom?				
Donations: Should NOT be the same person, but 3 different people. Below list names and positions.				
Who is responsible for receiving donated money?				
Who is responsible for depositing the money?				
Who is responsible for writing the thank-you?				
Does the thank-you indicate the amount donated?				
Supplies and Operating:	Y	N	NS	NA
Agency				
Travel records are maintained (i.e., mileage logs, gas receipts).				
Does documentation show Dates of Travel Purpose of Travel Odometer Readings Signed by person traveling Signed by supervisor				
Travel:	Y	N	NS	NA

Agency has written travel policy.				
Travel records are maintained (i.e., mileage logs, gas receipts).				
Does documentation show Dates of Travel: Purpose of Travel Odometer Readings Signed by person traveling Signed by supervisor				
Property Standards -- System provides for maintaining:	Y	N	NS	NA
Equipment:				
A description of equipment.				X
An identification number (serial number)				X
Source of property, including the award number				X
Where title vests				X
Acquisition date				X
Federal share of property cost				X
Location and condition of the property				X
Acquisition cost				X
Ultimate disposition information				X
Special Conditions: Office of Justice Program Financial Guidelines and Federal and/or State guidelines must be followed for the purchase of equipment and or services and for the property management or disposal of equipment purchased with federal funds. Property records for equipment purchased must be maintained which include a description, serial number, source, title holder, acquisition date, cost, percentage of federal dollars funded, location, and use and condition of the equipment. Subrecipients must adhere to written procurement procedures. If the agency does not have these they should defer to the State's procurement guidelines.				
Procurement Standards	Y	N	NS	NA
Agency has written procurement procedures, which (1) avoid unnecessary purchases; (2) provide an analysis of lease and purchase alternatives; and (3) provide a process for soliciting goods and services.				
Procurement process provides for selection on a competitive basis and documentation of cost or price analysis for each procurement action.				
	Y	N	NS	NA
Procurement system includes provisions for checking the "Excluded Parties List" for suspended or debarred subgrantees or contractors, prior to award? https://www.sam.gov/				
Contracts - Is there a written contract Y or N				
Review for the following:				
1. Name of contracting agency & contractee/persons/positions paid with grant funds				
2. Start & end dates.				
3. Amount to be paid to contractee.				
4. A listing of what is required from the contractee.				
5. A listing/statement of what the contracting agency will provide.				
6. Appropriate signatures for the contracting agency & the contractee.				
7. Termination clause.				
Agency monitors the effectiveness of its contracts.				
Other:				

Subaward Management & Monitoring:	Y	N	NS	NA
Agency passes through grant funds to other entities to achieve project's performance goals.				
Subawardees are provided written notification of funding level.				
Review award documents.				
Controls are in place to monitor activities of subawards to determine that federal funds are used for authorized purposes and in compliance with applicable laws, regulations, and provisions of the award and that performance goals are achieved.				

Comments :

VII. Governing Body				
Non-Profit Agencies	Y	N	NS	NA
Articles of Incorporation				
Agency By-laws				
Grant activities fit within agency's stated mission.				
Agency has written policies and procedures that are regularly updated to reflect best practice.				
Organizational Chart provides overview of structure and supervision.				
Are there any unreported Lawsuits at this time?				
Board of Directors (BOD)	Y	N	NS	NA
Agency has an established BOD comprised of volunteers.				
By-laws or policies address conflict of interest for board members.				
There is a process in place for informing board members of grant funded activities and requirements of grant awards and special conditions.				
Board approval is necessary for agency's annual budget, salary levels, agency policies, etc. Review meeting minutes for noted approvals.				
Board meets regularly.				
Meeting minutes are approved and kept on file. Request most recent.				
Board conducts fund raising activities, strategic planning, etc.				
There is clear evidence that the BOD adequately supervises appropriate staff.				
Board has a Finance Committee that meets regularly to review expenditures.				
Agency has current 990 available for public view. (Non Profit Only) Date submitted:				
Is the subgrantee certified by the IRS as a 501 (c) (3)				
Special Conditions - A private non-profit agency awarded funds shall have two (2) members of the Board of Directors review, on a quarterly basis, all expenditures for the agency. This review shall include, but is not limited to, checks written for the period, deposits, assurance of a balanced checkbook, review of the entries in the agency's ledgers and review of the income received from funding agencies and donations.				
Government Entities	Y	N	NS	NA
Grant activities fit within agency's stated mission.				
The program is adequately supervised by position indicated as responsible party.				
The program has written policies and procedures that are regularly update to reflect best practice.				
Communication occurs across departments as needed for grant and program purposes.				
Organizational Chart provides a clear chain of command.				

Comments :

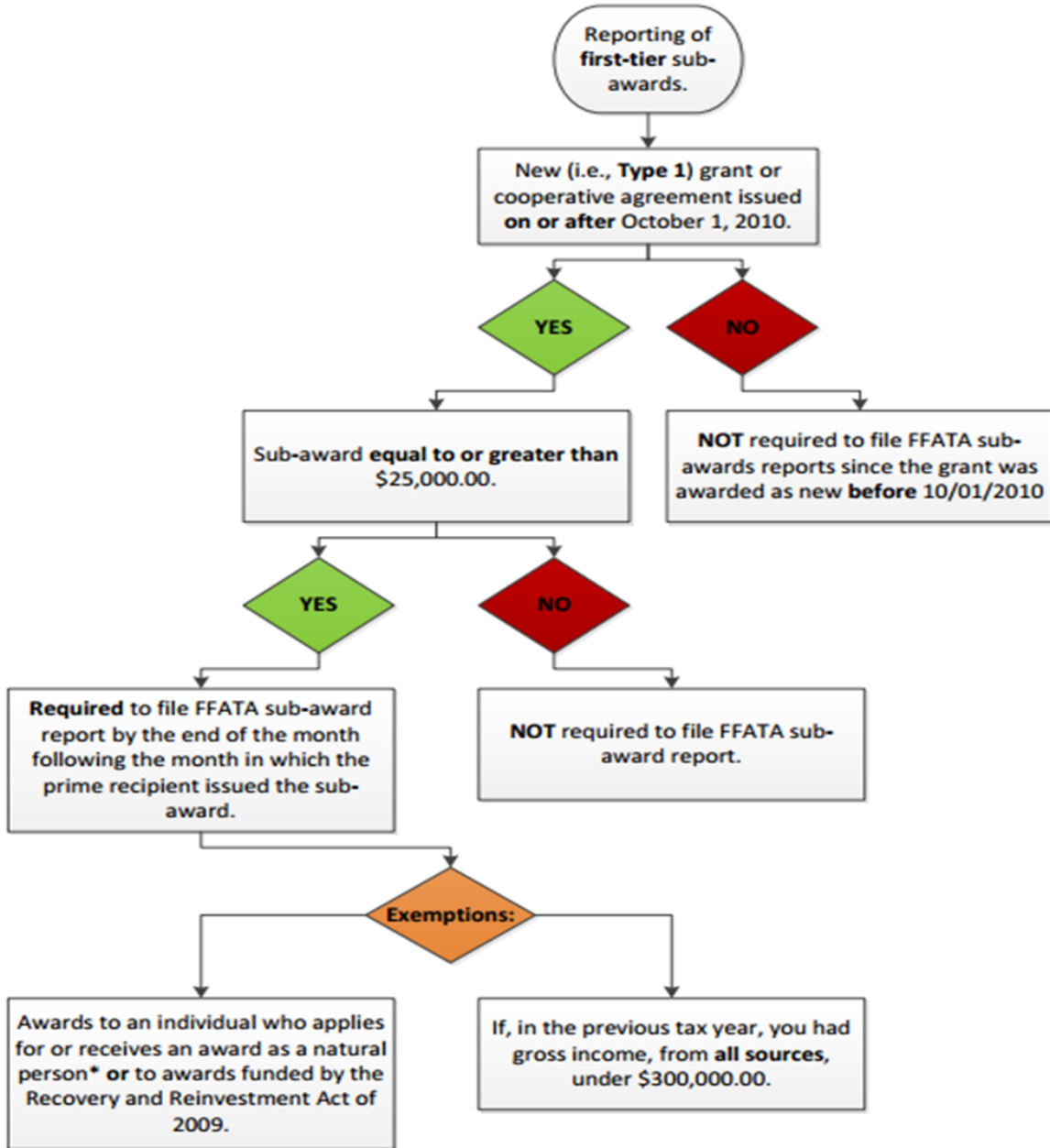
VIII. Federal Civil Rights Requirements				
	Y	N	NS	NA
Agency has submitted an EEOC Certification form to OCR.				
Agency has a written Anti-Discrimination policy for employees and is provided to them.				
The agency has a written Anti-Discrimination policy for clients and is posted for clients to access.				
The agency includes in the Anti-Discrimination policy how to file a complaint for staff and clients. Includes contact information for Office of Civil Rights.				
The agency has submitted an LEP Plan that meets the criteria.				
Staff and volunteers are knowledgeable of LEP Plan and have been trained on it.				
Important notices in agency are posted in other languages that are highly served. (i.e. safety, Anti-Discriminatory policy, brochures)				
Project services are accessible for individuals with a physical disability or have a hearing impairment.				
Training on civil rights issues is conducted annually with staff and a record of attendance is maintained.				
Agency has submitted all discrimination findings to OCR.				
Issues that would not pertain to all agencies:				
Agency (has 50+ employees and receives federal funding of \$25,000 or more) has a due process to address discrimination complaints on the basis of disability in employment practices. (Rehabilitation Act of 1973)				
Agency has an educational program/activity and has appropriately addressed Title IX 28 C.F.R. Part 54 as required.				
All religious activities of program are offered on a voluntary basis and agency does not base services offered on religious affiliation.				

Comments:

IX. Site Visit Summary	
Conclusions:	Check All That Apply
No changes to current grant funded program(s) are necessary.	
Changes in current grant funded program(s) are recommended.	
Changes in current grant funded program(s) are required.	
Recommendations:	
Follow Up Required: To be in compliance with grant funding the following items are required. Submit to shoyle@lancaster.ne.gov	Due Date:

APPENDIX D

Federal Funding Accountability and Transparency Act (FFATA): Sub-Recipient Reporting Requirements



*Unrelated to any business or non-profit organization he/she may own or operate in his/her name.