Grants Management Policies and Procedures Guide

EMPOWER RURAL IOWA
EMERGENCY BROADBAND EXPANSION GRANT
NOFA #003
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Overview

Introduction
Consistent with Section 4.1.6 of Notice of Funding Availability #003, the Office is issuing this Grants Management Policies and Procedures Guide, which may be updated from time to time, and which guide will describe the financial, oversight, and administrative requirements, policies, and procedures the Office will require Grantee’s to follow in the Office’s administration of CARES Act Requirements. The primary purpose of this guide is to assist grant recipients in navigating Project verification, reporting, claims, and other administrative processes in a manner that will facilitate the Office’s compliance with CARES ACT Requirements, and to develop, implement, and maintain meaningful grant oversight and coordination for the Office of the Chief Information Officer (OCIO) and its awardees. This Management Policies and Procedures Guide is considered a contractual obligation of Grantee.

Key Provisions for Federal Grants Management
The Empower Rural Iowa Emergency Broadband Expansion Program is funded through the Coronavirus Relief Fund CFDA Number 21.019. Schedule A, entitled Federal Funding ‐ Required Provisions, of the grant agreement generally contains the federally required provisions and requirements with which grantee is expected to comply. This Management Policies and Procedures Guide identifies key requirements, and generally outlines the manner in which the Office intends to coordinate and monitor compliance with these key requirements.

Registering on the SAM.gov
State agencies are responsible for reporting sub-recipient award data when federal funds are used and the total award amount (based on initial award or sum total of initial award and subsequent amendments) is equal to or greater than $50,000 (threshold required by U.S. Department of the Treasury). Grant recipients meeting the threshold above are required to register on the federal System for Award Management, sam.gov. Below is information available on the Federal Service Desk, fsd.gov, regarding how to register on SAM, and the information required to register:

- How do I register a new entity in SAM?
- What information do I need to register my entity in SAM?
- How do I update my entity’s existing SAM registration?
In addition to any additional or more restrictive terms in the grant agreement, the following key 2 C.F.R. requirements apply to this grant funding:

- **Internal Controls, 2 C.F.R. § 200.303**
  - Subrecipients are responsible for establishing and maintaining effective internal controls that provide assurances that the project is managed in compliance with the applicable federal statutes, regulations, and the terms and conditions of the federal award. Examples of these include:
    - Written policies and procedures for who can approve grant spending, how labor is recorded and charged to the project, and procedures for purchasing goods and services.
    - Adequate monitoring to ensure charges to the grant are reasonable, allocable, and not limited or excluded by federal cost principles.
    - Reconciliations such as your organization taking a physical inventory of property purchased with federal funds?
    - The segregation of duties, such as having different people recording transactions, authorizing transactions, and having custody of the assets.
    - Documentation that supports the expenditure of project funding such as:
      - Receipts that have enough detail to determine if the costs are allowable.
      - Timecards or time reporting records showing what grants and other activities the employee spent their time on.
- **Monitoring, and management are subject to the requirements in the Uniform Guidance as applicable to federal financial assistance 2 C.F.R. § 200.330 through 200.332.**
  - OCIO will monitor by reviewing financial information and project completion materials submitted through the claims process. The Office reserves the right to monitor subrecipient performance through site visits.
- **Subpart F, Audit Requirements, as applicable**
  - Nonprofit and local government subrecipients that expend $750,000 or more in a year in federal awards (from all sources) shall have a single audit conducted for that year in accordance with the provisions of the OMNI Circular, OMB Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 C.F.R. 200. A copy of the final audit report shall be submitted to the Office if either the schedule of findings and questioned costs or the summary schedule of prior audit findings includes any audit findings related to federal awards provided by the Office. The audit report, if required, shall include a schedule of the prior year’s questioned costs (to the extent applicable), along with a response to the current status of the prior year’s questioned costs. Copies of all management letters written as a result of the audit shall also be forwarded to the Office within one (1) month of the time of receipt by the Grantee accompanied by an action plan, if applicable, for each. Grantee shall provide the Office with a copy of any written audit findings or reports, whether in draft or final form, required to be submitted to the Office per the criteria above within two (2) Business Days following receipt by the Grantee. If an audit report is not required
to be submitted per the criteria above, the subrecipient must provide written 
notification to the Office that the required audit was conducted in accordance with 
Government Auditing Standards and that neither the schedule of findings and 
questioned costs nor the summary schedule of prior audit findings includes any audit 
findings related to federal awards provided by the Office. See the OMNI Circular, Section 
200.330, Subrecipient and Contractor Determinations for a discussion of subrecipient 
versus contractor (vendor) relationships.

- These audit requirements do not generally apply to a for-profit business; however, the 
Office remains responsible for ensuring compliance with the Agreement and CARES Act 
Requirements through the implementation of audit and monitoring controls pursuant to 

The Following Federal CARES Act Requirements that Apply to this Funding: 

- Sub-recipients shall maintain and make available to the Treasury OIG upon request all 
documents and financial records sufficient to establish compliance with subsection 601 (d) of 
the Social Security Act, as amended (42 U.S.C. 801(d), which may include:
  - A general ledger or unique identifier used to account for:
    - The recipient of Coronavirus Relief Fund payments and;
    - The disbursement from such payments to meet eligible expenses of the 
      Empower Rural Iowa Emergency Broadband Expansion Program.
  - Budget records from 2019 and 2020;
  - Payroll, time records, human resource records to support costs incurred for payroll 
    expenses related to grant.
  - Receipts of purchases made related to implementing the awarded project.
  - All documentation related to contracts entered into using Coronavirus Relief Fund 
    payments and all documents related to such contracts.
  - All documentation of reports, audits, and other monitoring of contractors.

- Federal Funding Accountability and Transparency Act (FFATA). Upon request of the awarding 
state agency, the sub recipient shall provide their DUNS number, and submit information 
related to highly compensated officers information when:
  - In preceding fiscal year, federal funds made up more than 80% of gross annual revenue;
  - In preceding fiscal year, their organization received more than $25 million annual gross 
    revenue in federal funds; and
  - The compensation of the senior executives in their organization (including parent 
    organization, all branches, and all affiliates worldwide) is not publicly available

Federal Requirements –Grantee Certification/Supporting Documentation in Grant File 

- Drug Free Workplace. This certification is required by the regulations implementing Sections 
701 et seq.).

- Lobbying. This certification is required by the provisions of Section 319 of Public Law 101-121, 

- Certification Regarding Environmental Tobacco Smoke. This certification is required by Public 
Law 103-227, also known as the Pro-Children Act of 1994 (“Pro-Children Act”).
• Equal Treatment for Faith Based Organizations. Grantee shall comply with any applicable requirements of 28 C.F.R. Part 38, governing “Equal Treatment for Faith Based Organizations.”
• Immigration and Naturalization Service. Grantee certifies that it keeps on file, as appropriate, Immigration and Naturalization Service Employment Eligibility Verification Form (I-9) forms for applicable Grantee Personnel
• Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended.
The Grants Management System
To ensure consistency and accountability in securing and managing grant funds, all subrecipients must utilize the iowagrants.gov system. This grants management system shall process all application submissions, programmatic and financial reporting, claims, and project closeout documents.

Tips for working within the IowaGrants.gov system:
● Always use the navigation buttons within the IowaGrants.gov screen (e.g. Back, Add, Delete, Edit, Save, etc.) instead of using the web-browser buttons at the top of the window.
● When entering information, fields marked with a red asterisk are required.
● If you are having trouble logging into iowagrants.gov, email OCIO staff at: ociogrants@iowa.gov

Step 1: Navigating the Main Menu
The main menu screen of IowaGrants.gov will look like this:

Click on the “My Grants” icon to access current projects that are underway.
Step 2: Select the Project Title for a Claims Processing

Step 3: Select the “Claims” Project Component
Step 4: Click “Add” to Create Claim

Step 5: Enter the Claim General Information

Select the Claim Type* “Advance” or “Reimbursement”

Enter the Report Period “From Date” as the beginning date of project work. *This date cannot be earlier than the issuance of the Notice of Funds Availability (March 1, 2020).*

Enter the Report Period “To Date” as the date of all work completed and allowable expenditures incurred. When completing an Advance Payment Request select the “To date” that best represents the timeframe these Advance funds will be spent.

Click “Save” when complete.
Step 6: Return to Components

Click the “Return to Components” link.

Step 7: Advance Payment Claim Components
Step 8: Complete the Component Form- Reimbursement

Your screen will now have two components (forms) that require information regarding project completion. Select the “Reimbursement” link.
Step 9: Edit the Reimbursement Budget Component

The Reimbursement Form will prepopulate with the Iowa Grants Application Budget incorporated into your project’s grant agreement. Click “Edit” to begin populating the form. Enter in the anticipated expenses that the advance payment will fund.

**Adoption Projects were approved an amount per school district ($500 x number of Non-adopters). Advances will not be paid out for this portion of your project.**
Step 10: Enter Projected Expenses for Advance Payment

Once you are complete with the form edits, “Click Save”.

**An Advance Payment cannot exceed 50% of the total Infrastructure awarded grant budget.**
Step 11: Click “Mark as Complete”

Once you have reviewed your requested expenses this period (arrow), click “Mark as Complete”.

Step 12: Submit the Advance Claim
In order to submit the Advance Claim both forms must be complete (check marks). Click “Submit” when your claim is ready for OCIO review and payment. Once a claim is submitted all sections will be locked from further editing.

Step 13: Print and Save Claim Form and Place in Grant File

Please refer to the Addendum in this guide that provides a grant file checklist. The project grant file will assist the Office or other federal agency in auditing your federally funded project for compliance with the applicable regulations.

Project Completion and the Claims Reimbursement Process

Step 14: Navigating the Main Menu – Project Completion and Claims Reimbursement

Click on “My Grants” to begin the project closeout and claims reimbursement process.
Step 15: Select Grant

Click on the project title of your grant. Make sure to cross reference the Project ID number and award amount.

Step 16: Begin the Claims Process

First click “Claims”. 
Next click “Add”.

Select “Reimbursement” as the Claim Type. Enter in the project performance period. Click “Save”.
Click “Return to Components”.

Step 17: Certification of Project Completion

Select “Certification of Project Completion NOFA #003

Infrastructure Project Performance and Certification

Click “Edit”.
If your grant included an Infrastructure Project, read through the certification statements above. Select “Yes” to certify your infrastructure project was completed as represented in the applicable statement.

**If your grant award did not include an infrastructure project, click “Not Applicable”.

Submit Project Completion Materials and GIS Data

Upload your completed project materials. This includes an updated Exhibit B (Infrastructure Project) and/or Exhibit B.1 (Adoption Project). Also upload GIS data that demonstrates specifically where your broadband Infrastructure Project has been installed. Examples include an as built of the completed...
project or other visual representation. Adoption Projects submit GIS that represents the projects served areas by school district.

Infrastructure Project Permit Field Testing Certification

If you completed an Infrastructure Project, read the statements above and select “Yes” or “No”. If you only completed an Adoption Project, select “Not Applicable”.

Infrastructure Project Qualified Certification

If you selected “No” to any of the Infrastructure project certifications, enter your project qualification narrative in this space.
Infrastructure Project Acknowledgement

Read the Instructions and select “Yes” or “No”.

Select “Not Applicable” if you are completing an Adoption Project.

Step 18: Adoption Project Certification

If you completed an Adoption Project as part of your grant award, read the certification statements and select “Yes” or “No”.

If you only completed an Infrastructure Project, select “Not Applicable”.

If you completed an Adoption Project as part of your grant award, read the certification statements and select “Yes” or “No”.

If you only completed an Infrastructure Project, select “Not Applicable”. 
Step 19: Complete Certification of Project Completion Form

Click “Save”

Click “Mark as Complete”. Remember to complete all of the questions that have a *. These questions are required and must be answered before the form can be completed.
Step 20: The Summary of Allowable Expenses Form

Click on the “Summary of Allowable Expenses NOFA #003 Form

Enter in the Infrastructure Project “Total Project Costs” and “Reimbursement Requested” amounts into the chart. If you cannot enter amounts, click “Edit” at the top of the webpage.
If you received an Advance Payment, include that amount in the Reimbursement Requested total.

Infrastructure Project Allowable Expenditures Uploads

Collecting the Required Documentation for Reimbursement – Infrastructure Projects

The Office of the Chief Information Officer requires two types of proof for each project expenses:

1. Proof of Purchase
2. Proof of Payment

Proof of Purchase

Identifies what was purchased and when. Acceptable documents include:

- Detailed invoices
- Itemized receipts

Requirements:

- Invoices must have an itemized list or a description of the items or services purchased. OCIO cannot accept a statement that lists invoice numbers without descriptions.
- If there are unrelated items on the invoice or receipt, identify them.
- Purchases must occur within the date of the issuance of the Notice of Funds Availability (based on your award cycle) and the project completion date.

Proof of Payment

Identifies how and when payment for items was made. Acceptable documents include:

- Bank statements
- Cleared checks
- Credit card statements

Requirements:

- Checks must be cleared by your bank or credit union. Carbon copies of checks are not sufficient proof.
- Date of payment cannot occur before purchase.
- If there is sensitive information on the documents, cover or remove it before uploading into IowaGrants.gov. We do not need to know your account number or routing number.

Documents that Provide both Proof of Purchase and Proof of Payment Include:

- Zero-balance invoices or statements
- Zero‐balance receipts

Requirements:
- Zero‐balance proof must have payment date(s) and identify method of payment.
- Handwritten zero‐balance receipts or invoices require additional proof of payment.

**SAMPLE INVOICE**

To Calculate **Total Allowable Expenditures**:

Locate the total costs on the invoice. *e.g. Total: $86,701.00*
Calculate total ineligible item costs based on the awarded application budget line items. *e.g. Detailed Cost Analysis $10,000*
Subtract ineligible total costs *(including tax if applicable) = $10,000*
Identify Total Allowable Costs = $76,701.00
The Authorized Fiscal Officer must initial and date the change on the invoice.

Internal Time Reporting Reimbursement Requirements (Include in Proof of Payment Upload)
- Compensation must be reasonable and in line with work on similar activities performed by your organization.
- Personnel Activity Reports for each employee (by pay period) must be uploaded as supporting documentation.

**Personnel Activity Reports (PAR)**
- Your time and effort reporting system must be supported by a strong system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
  - Must allocate salary, wages, and benefits to the appropriate project accounts.
- Must account for 100% of the employee’s compensated time. Non-federal activities may be lumped together as “other”.
- Comply with the established accounting policies and practices of your organization.

Filling Out the Summary Invoice

A summary invoice, included on the Grantee organization letterhead, is the first upload of required supporting documentation files. Be sure to include the following for each item on the summary invoice:

- **Proof of Purchase**—lists the type of proof (invoice or receipt) and include the invoice number, if available.
- **Description of Purchase**—briefly describe the item(s) and how it relates to the grant project (allowable expenditure category code).
- **All items Allowable**—write “yes” if all items are all allowable or “no” if the proof of purchase includes unallowable items.
- **Vendor Name**—identify the business that provided the goods or services.
- **Date of Purchase**—include the date the item or service was purchased (must be after the applicable issuance of the Notice of Funds Availability and before the completion of the project).
- **Proof of Payment**—list the type of proof (bank statement, cleared check, zero-balance invoice with payment date, zero-balance receipt with payment date, or credit card statement)
- **Total Invoice Amount**—enter the invoice total.
- **Total Allowable Cost**—enter the amount the Grantee is submitting for the total allowable expenditures.

SAMPLE SUMMARY INVOICE CHART

<table>
<thead>
<tr>
<th>Proof of Purchase</th>
<th>Description of Purchase</th>
<th>All items Eligible</th>
<th>Vendor Name</th>
<th>Date of Purchase</th>
<th>Proof of Payment</th>
<th>Total Invoice Amount</th>
<th>Total Allowable Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Invoice #123</td>
<td>Conduit (Code DC1)</td>
<td>Yes</td>
<td>Conduit Inc.</td>
<td>1/20/2020</td>
<td>Check #1000</td>
<td>$3,500</td>
<td>3,500.00</td>
</tr>
<tr>
<td>Receipt</td>
<td>Fiber (Code DC2)</td>
<td>Yes</td>
<td>Fiber, LLC.</td>
<td>1/21/2020</td>
<td>Credit Card Statement</td>
<td>$500.00</td>
<td>$250.00</td>
</tr>
<tr>
<td>Invoice DC3, DC4</td>
<td>No</td>
<td>AAA Engineering</td>
<td>4/1/2019</td>
<td>Check #378</td>
<td>$76,701.00</td>
<td>$75,701.00</td>
<td></td>
</tr>
</tbody>
</table>

SAMPLE INTERNAL STAFF TIME REPORTING SUMMARY CHART

<table>
<thead>
<tr>
<th>Pay Period</th>
<th>Employee ID</th>
<th>Classification-Budget Category</th>
<th>Rate of Pay</th>
<th>Hours Worked</th>
<th>Total Requested Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/21/-9/3/2020</td>
<td>T1235</td>
<td>Knifing (DC10)</td>
<td>$20.00</td>
<td>15.00</td>
<td>$300.00</td>
</tr>
</tbody>
</table>
Adoption Project Uploads

Collecting the Required Documentation for Reimbursement – Adoption Projects
The Office of the Chief Information Officer requires two forms of project documentation for the claim’s reimbursement process:

1. A Project Summary Report
2. Project Supporting Documentation

The Adoption Project Summary Report
A summary invoice, included on the Grantee organization letterhead, is the first upload of required supporting documentation. Be sure to include the following for each item on the summary report:

- Non-Adopter Identification (Name and Address)
- Was the Non-Adopter able to obtain 25/3 at their location before December 1, 2020?
- The Non-Adopter did not qualify for or participate in the FCC’s Lifeline Program for Low Income Consumers?
- Did the Non-Adopter otherwise lack the ability to adopt 25/3 Broadband or greater without the discount as a result of a hardship related to COVID-19 public health disaster emergency? Identify the hardship.
- Amount of grant funds provided.

Sample Summary Adoption Project Chart

<table>
<thead>
<tr>
<th>Name</th>
<th>Street Address</th>
<th>City</th>
<th>Zip</th>
<th>25/3 Service Provided</th>
<th>FCC’s Lifeline Program Participant</th>
<th>COVID-19 Hardship</th>
<th>Grant Funds Expended</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jessica Turba</td>
<td>200 East Grand Ave</td>
<td>Des Moines</td>
<td>50309</td>
<td>Yes</td>
<td>No</td>
<td>Telework</td>
<td>$500.00</td>
</tr>
</tbody>
</table>

Adoption Project Supporting Documentation
Upload supporting documentation for the Non-Adopters identified on the Adoption Project Summary Report. This includes:

- Customer billing that identifies the service timeframe, the internet package purchased (minimum 25/3 service), and the amount of the credit issued to the account. *The credit can be spread across multiple billing cycles, but must be completed expended by December 1, 2020.*
Certification of Project Allowable Expenditures

By completing the Summary of Allowable Expenditures form, you hereby certify and attest the following:

- That such Allowable Expenditures are true, accurate, and in fact constitute Allowable Expenditures, incurred after the period established by the CARES Act Requirements. The period of performance for Infrastructure Projects began March 1, 2020 and ends at the date of Project Completion or July 1, 2021 (whichever comes first). The Adoption Project period of performance began with the issuance of the NOFA (July 20, 2020) and ends December 1, 2020.

- That such Allowable Expenditures are directly related to the installation of Broadband Infrastructure that facilitates at least 25/3 Broadband.

- That such Allowable Expenditures were utilized for the installation of Broadband Infrastructure in Census blocks identified in the original Application/forming the basis of the Project (except and solely to the extent as otherwise permitted by an exception granted to a Grantee by the Office as part of the Application process).

- The expenditures are directly related to furthering telework, telehealth, distance learning, and other remote services in connection with the COVID-19 pandemic.

Read the statements and select the applicable answer based on project types and expenses incurred.

Complete the Summary of Allowable Expenditures Form

Click “Save”.
Click “Mark as Complete”.

Step 21: Complete the Reimbursement Form

Select the “Reimbursement Form”.
Enter in the expenses that are part of this reimbursement request. If you received an advance payment, **do not include** those expenses in this column. Adoption Project expenses are at the bottom of this chart and organized by school district. Enter in the total amount claimed by approved school district. Click “Save” once complete.

**If you cannot enter in amounts into this form, go to the top of the webform and click “Edit”.**
Review the Reimbursement Form and click “Mark as Complete”.

All of the Components must be complete. Click “Submit”.
This screen will appear once your claim is submitted.

The Claims Payment Process
OCIO Broadband Program staff will receive notification of the claim once it is submitted by the Grantee. When the claim is reviewed, staff will notify the grantee of an action taken. These actions could include:

1. Approval of the claim— the Iowa Department of Administrative Services will issue payment.
2. Negotiation of the claim— the claim form is sent back to the Grantee for an edit.

All correspondence related to claims payment will be generated within the IowaGrants.gov grants management system.

Negotiating Claims
The purpose of negotiating a claim is to allow the Grantee to change the claim based on OCIO staff review.

Examples could include:

- The total requested reimbursement amount does not match the supporting documentation provided.
- The amount requested for reimbursement does not match the grant award amount.

Once a claim is negotiated back for an edit, one or more of the claim form components will be unlocked for editing. The status of the claim will be changed to “Correcting”. Once the Grantee resubmits the claim, the status will change to “submitted”. OCIO staff will review the changes and determine if the claim can be approved for payment. OCIO recommends printing a copy of your approved claim forms for records keeping.

Iowa Broadband Program Office Contact Information:
If you have questions, please email OCIO at: ociogrants@iowa.gov or call (515)-281-5503.

Attn: Jessica Turba, Special Projects Administrator
Office of the Chief Information Officer, State of Iowa
200 East Grand Ave.
Des Moines, IA 50309