|  |
| --- |
| STATE OF NEW JERSEY  DEPARTMENT OF LAW AND PUBLIC SAFETY  OFFICE OF THE ATTORNEY GENERAL  **FFY 2018**  **Addressing the Training Needs of Juvenile Prosecutors Grant Program**    **Program Administration and Funding Guidelines**  October 2019 |

STATE OF NEW JERSEY

DEPARTMENT OF LAW AND PUBLIC SAFETY

OFFICE OF THE ATTORNEY GENERAL

**Addressing the Training Needs of Juvenile Prosecutors**

**Program Administration and Funding Guidelines**

# ADMINISTRATION

The Addressing the Training Needs of Juvenile Prosecutors program, Department of Justice Appropriations Act, 2018, Pub. L. No. 115–141, 132 Stat. 348, 423, 426, funds states to provide training and professional development and develop resources needed to ensure that juvenile prosecutors have access to information that addresses the unique framework of the juvenile court. This program addresses the need for more trainings and resources dedicated to familiarizing attorneys with special procedures and challenges that arise with juvenile prosecution. This involves more than training on trial techniques and procedural law, but also training on age-related characteristics of youth, assessing risk and protective factors for youth, and assessing readiness for rehabilitation.

In New Jersey, the Department of Law and Public Safety (L&PS) administers this grant program. L&PS will provide technical assistance to both applicants, during the development of the proposal, and to subrecipients, during the implementation of the project. L&PS monitors all grants awarded under program, and ensures subrecipients are in compliance with State and federal laws, rules, regulations, guidance, and reporting requirements. L&PS also prepares and submits programmatic and fiscal reports.

***Recipients of federal grant funds are bound by changes made in federal and State law/policy regardless of inclusion in these guidelines.***

All inquiries concerning the Subaward application process should be addressed to:

Samantha Hamilton, DAG at 609-376-3373

# PROGRAM INFORMATION

The goal of the Addressing the Training Needs of Juvenile Prosecutors program is to increase the capacity of juvenile prosecutors to seek justice in their cases by providing them access to professional development opportunities, trainings, and resources that will enhance their current knowledge base compassion, and respect by the criminal justice system to prevent secondary victimization by the system.

The program will strengthen the prosecution of juvenile delinquency cases by providing training, technical assistance, resources, and professional development opportunities to juvenile prosecutors and their support staff that will address the unique issues and challenges that juvenile prosecutors encounter.

# APPLICATION REQUIREMENTS

## SUBMISSION

Refer to the Notice of Availability of Funds (NOAF) for application due dates.

**Unless otherwise noted, the head of the subrecipient State Agency, organization, or local unit of government should sign these documents** (e.g. State Agency head, Chief Executive, President, Chairperson of the Board, County Executive, County Manager, County Supervisor, County Board President, Mayor, or Village President).

To promote consistency, applicants should use the format outlined on the following pages for the development of the proposal.

L&PS reserves the right to decline any application for grant funding and to award subawards in amounts that may be other than requested.

**\*\*\*Notice\*\*\***

**Information contained in grant applications** **may NOT be considered confidential** pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq. Do not include any information from any source in the grant application that you believe should not be made available for public review. Denoting information contained in your application as “confidential” or “not subject to public review” may not, standing alone, exempt the included information from public review.

## 

## PROPOSAL FORMAT AND REQUIREMENTS

### 

### Proposals must be emailed to the following email address: [HamiltonS@njdcj.org](mailto:HamiltonS@njdcj.org).

All application requirements must be received by the application deadline set forth in the NOAF. It is strongly recommended that agencies submit their proposals prior to the deadline to ensure all documents are received on time.

The program narrative must be double-spaced, using a standard 12-point font (Times New Roman preferred); have no less than 1-inch margins; and pages should be numbered.

**PROJECT INFORMATION:**

Please use the Project Information form for your submission. It includes the following sections:

**Agency- Specific Information**

* Please complete all fields.

**Project-Specific Information**

* Please complete all fields.

**Agency Contact Information**

* Please complete all fields.

**Brief Description of your Project**

**PROJECT NARRATIVE**

***Description of your Agency Background, Mission, Experience and Capability***

* + Please provide a brief, description of your agency’s mission, background, capability and experience as it relates to the purpose and objectives of the proposed project.

***Problem Statement/Needs Assessment***

* + Identify the specific issue(s), target population and geographic area the proposed project will address. You may describe the characteristics and needs of the target population, the local conditions and needs, the existing services, and the gaps and/or barriers in services.

***Goal, Objectives and Implementation***

* + What is the goal of your project?
    - Applicants should describe the program’s intent to change, reduce, or eliminate the problem noted in the previous section and outline the project’s goals
  + What are your specific objectives to achieve your goal?
    - Objectives are specific, quantifiable statements of the project’s desired results. They should be clearly linked to the problem identified in the preceding section and measurable. (Examples of measurable objectives include the following: 149 juvenile prosecutors were trained during the reporting period, 134 juvenile prosecutors reported increased knowledge and understanding as the result of participating in the training.)

***A List of Key Project Staff***

* + Please provide a list of Key Project Staff/Titles that will be working on the project.

***Data Collection/Performance Measures/Evaluation***

* + Please provide a description of how you will collect data, measure performance and complete an overall evaluation of the project.
  + **Awarded applicants will be required to enter required data (quarterly performance metrics) through OJJDP’s online Performance Measurement Tool (PMT) located at** <https://www.ojp.gov/performance>**.**

# BUDGET DETAIL AND NARRATIVE:

Applicants must provide an itemized list of costs and a narrative explanation as to why those costs are necessary to the success of the project. Costs must be specific and tied to the project objectives.

# Budget Categories

Budget categories appearing on the Budget Detail Form are listed and explained below.

## Personnel

List each employee or volunteer by name and position.

Compensation paid for employees engaged in grant activities must be consistent with that paid for similar work within the applicant organization.

Federal funds may not be used to pay total cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government’s Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (A salary table for SES employees is available at [www.opm.gov](http://www.opm.gov)).

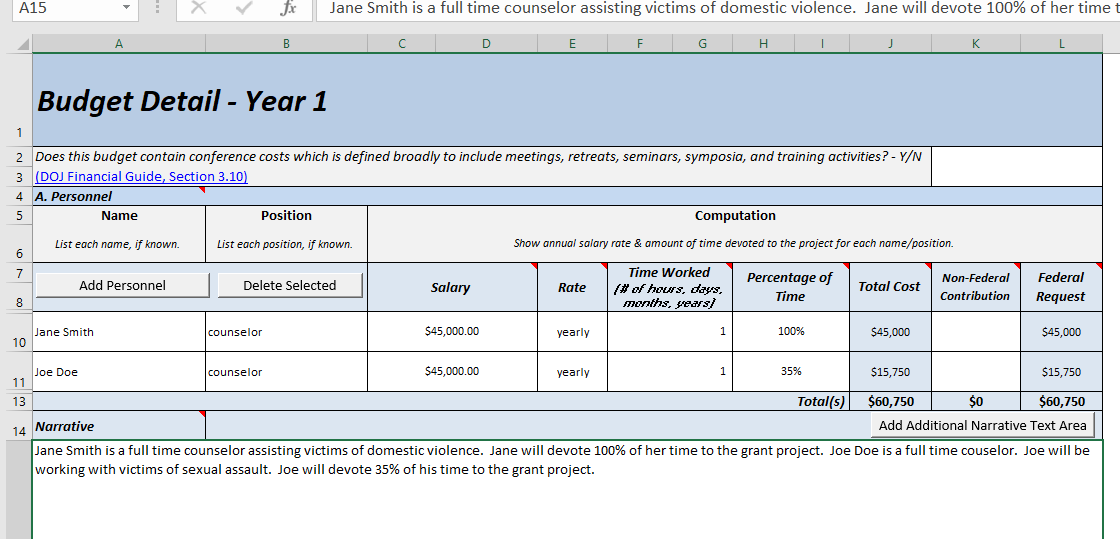
## Fringe Benefits

If salaries are being reflected in the budget as a cost of the project, the **corresponding** fringe must also be included, whether being paid for by grant funds or from another source (*i.e.* match).  For each employee requested under “Personnel,” the salary’s corresponding fringe amount must be accounted for under “Fringe Benefits” on the Budget Detail Form

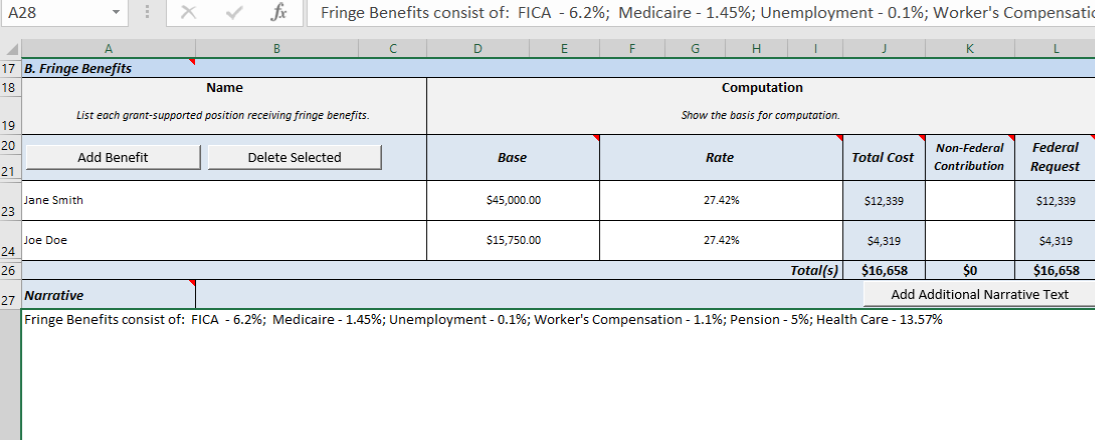
Employee fringe benefits, should be listed as a total of all fringe categories however, the narrative should include a breakdown of each item included in the total fringe rate; such as retirement, FICA and health insurance.

Example:

*Salary:*



*Corresponding Fringe:*



## Travel

Travel costs are allowable if permitted under the current State Travel Circular, 16‑11‑OMB, as amended, which is located at the following website: <http://www.state.nj.us/infobank/circular/circindx.htm>.

**Mileage reimbursement cannot be charged in excess of the New Jersey State maximum of $.35 per mile (effective July 1, 2019)**. Travel costs should include the proposed destination and purpose of the trip(s).

Itemize travel expenses of project personnel by purpose (e.g., staff to training, field interviews, advisory group meeting, etc.). Show the basis of computation using the fields provided in the budget template. Expenses should be consistent with federal per diem rates ([www.gsa.gov](http://www.gsa.gov)); in the absence of a federal per diem rate, travel expenses must be consistent with State per diem allowances.

Travel expenses for consultants should be included in the “Consultant Travel” data fields under the “Subawards (Subgrants)/Procurement Contracts” category.

## Equipment

Requests for equipment should contain adequate cost specifications, including equipment item, quantity and estimated costs. Specific brand names should be excluded.

Equipment means tangible personal property (including information technology systems) having 1) a useful life of more than one year and 2) **a per-unit acquisition cost of $1,000 or greater** (or your organization’s capitalization policy, if it is less than $1,000).

An inventory of all equipment purchased with subaward funds or through the federal excess property program must be maintained as part of the official grant file. **Equipment must be used, maintained, and disposed of in a manner consistent with the standards outlined in 2 C.F.R. Part 200, Subpart D, Subtitle 3, Equipment (2 C.F.R. 200.313, supplemented by 2 C.F.R. 2800.313, and 2 C.F.R. 200.439) and the DOJ Financial Guide.**

If you do not fully justify the need for the itemized equipment in your budget and budget narrative, L&PS may require that additional information be provided before the budget can be approved.

Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances. **Rented or leased equipment costs should be listed in the “Contracts” data fields under the Subawards (Subgrants)/Procurement Contracts” category**.

Please explain how the equipment is necessary for the success of the project in the Budget Narrative, as well as the procurement method to be used. Equipment must be procured in accordance with the Subrecipient’s own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in 2 C.F.R. 200.317 – 200.326.

## Supplies

Supplies means all tangible personal property other than those described in “Equipment.” A computing device (laptop, tablet, etc.) is a supply if the acquisition cost, per item, is less than $1,000, regardless of the length of its useful life.

Estimate the cost of consumable supplies directly required by the project. Costs should be itemized, showing computation and per unit cost. General office supplies can be condensed into one line-item – for example: “General Office Supplies including, but not limited to paper, pens, folders, tape, paper clips, etc.” All other supplies should be itemized.

## Construction

## Construction is not allowable.

## Minor repairs or renovations may be allowable and should be classified in the “Other” category.

## Subawards (Subgrants), Procurement Contracts, & Consultant Fees

**Subaward** means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program.

Provide a description of the Federal award activities proposed to be carried out by any subrecipient and an estimate of the cost (include the cost per subrecipient, to the extent known prior to application submission). For each subrecipient, enter the subrecipient entity name, if known.

**Procurement contracts** means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.

Provide a description of the product or service to be procured by contract and an estimate of the cost. Applicants are encouraged to promote free and open competition in awarding procurement contracts. A separate justification must be provided for sole source procurements in excess of the Simplified Acquisition Threshold set in accordance with 41 U.S.C. 1908 (currently set at $150,000).

**Consultant Fees**: For each consultant enter the name, if known, service to be provided, hourly or daily fee (8-hour day), and estimated time on the project. Consultant fees in excess of the DOJ grant-making component’s maximum rate for an 8-hour day (currently $650) require additional justification and prior approval. "

## Other Costs

## List items (e.g., rent, reproduction, telephone, janitorial or security services, and investigative or confidential funds) by type and the basis of the computation. For example, provide the square footage and the cost per square foot for rent, or provide a monthly rental cost and how many months to rent.

# I. Indirect Costs

Indirect costs are allowed only if: a) the applicant has a current, federally approved indirect cost rate; or b) the applicant is eligible to use and elects to use the “de minimis” indirect cost rate described in 2 C.F.R. 200.414(f). An applicant with a current, federally approved indirect cost rate must attach a copy of the rate approval.

Narrative for any indirect costs should clearly state which direct costs the indirect cost agreement is being applied to. All requested information must be included in the budget detail worksheet and budget narrative.

In order to use the “de minimis” indirect rate an applicant would need to attach written documentation to the application that advises L&PS of both the applicant’s eligibility (to use the “de minimis” rate) and its election. If the applicant elects the de minimis method, costs must be consistently charged as either indirect or direct costs, but may not be double charged or inconsistently charged as both. In addition, if this method is chosen then it must be used consistently for all federal awards until such time as the applicant entity chooses to negotiate a federally approved indirect cost rate.

Please see the *Indirect Cost Rate Fact Sheet* for additional information.

# Allowable Costs

Costs must be reasonable, allocable and necessary for the project. Allowable costs are those charges identified under the grant program’s authorizing legislation, regulations and applicable Federal cost principles found at **2 CFR Part 200, Subpart E, Costs Principles** (2 CFR § 200.400 et seq.).

Applicants and Subrecipients (Recipients or Subrecipients of federal funds) must also adhere to the financial and administrative requirements set forth in the most current version of the **U.S. Department of Justice (DOJ) Financial Guide**, located at <https://www.justice.gov/ovw/file/1030311/download>. The DOJ Grants Financial Guide includes information on allowable costs, audit requirements, accounting systems, financial records and the administration of grant funds.

Applicants and Subrecipients must also comply with the **NJ State Department of Treasury, Office of Management and Budget, State Circulars**, as issued and superseded, found at <http://www.state.nj.us/infobank/circular/circindx.htm>, andspecifically, State Circular Standard Grant Agreement Form, X. Allowable Costs, 07-05-OMB (as amended).

# Unallowable Costs

Generally, allowable costs may be rejected if, in L&PS’s determination, such costs are excessive, unreasonable, or not integral to the success of the project. All items of cost will be reviewed by L&PS to determine eligibility. Also, costs incurred outside the project period (before or after) are not allowable. For questions pertaining to budget and examples of allowable and unallowable costs, see the DOJ Grants Financial Guide at <https://www.justice.gov/ovw/file/1030311/download>.

# ADDITIONAL APPLICATION AND AWARD REQUIREMENTS

# Supplanting

Federal grant funds must be used to supplement existing funds for program activities and cannot replace, or supplant, nonfederal funds that have been appropriated for the same purpose. If there is a potential of supplanting, the applicant may be asked to supply documentation demonstrating that the reduction in non‑federal resources occurred for reasons other than the receipt or expected receipt of federal funds. For additional supplanting guidance, see the DOJ Grants Financial Guide available at: <https://www.justice.gov/ovw/file/1030311/download>.

# Application Authorization

The submission of any subaward application requires the signature of the applicant unit of government’s Chief Executive Officer, agency head or authorized party and Project Director. Signature indicates that the information provided within the application is truthful, accurate and complete, and the applicant intends to comply with all requirements regarding the use of subaward funds, and will use the subaward funds to carry out the project as described in the application. The Project Director and Chief Executive Officer also acknowledge that they are responsible for authorizing expenditures and disbursing of subaward funds.

# Resolution

**Applicants awarded funds, except State Agency applicants, must return a certified Resolution with their AWARD packages at the award stage. Applicants are NOT required to submit resolution with their applications.**

The Resolution should state that the Subrecipient unit of government/nonprofit organization agrees to accept the funding and must indicate **the specific federal amount and match amount (if applicable**). The Resolution must be certified by the recording officer and should contain the official seal. A Resolution and Certification checklist will be provided to successful applicants upon award.

# Civil Rights and Nondiscrimination Compliance

Applicants are required to comply with nondiscrimination requirements contained in State and Federal laws and regulations. If a court or administrative agency makes a finding of discrimination against a recipient of funds on grounds of race, color, religion, national origin, gender, disability, or age after a due process hearing, the recipient must forward a copy of the finding to the Office of Justice Programs, Office of Civil Rights and L&PS.

Applicants are also required to comply with the federal civil rights laws included in Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI), Section 504 of the Rehabilitation Act of 1973, Section 901 of Title IX of the Education Amendments of 1972, Section 303 of the Age Discrimination Act of 1975, and the Juvenile Justice and Delinquency Prevention Act, as amended. These laws prohibit discrimination on the basis of race, color, religion, national origin, and sex in the delivery of services. National origin discrimination includes discrimination on the basis of Limited English Proficiency (LEP). To ensure compliance with Title VI and the Safe Streets Act, applicants are **required to take reasonable steps to ensure that LEP persons have meaningful access to their programs**. Meaningful access means that recipients of federal funding may have to provide language assistance services, including oral or written translations, when necessary.

Applicants are expected to comply with the provisions of the DOJ regulations concerning Equal Treatment for Faith‑based Organizations, 28 C.F.R. Part 38. Eligible faith‑based applicants who apply for subawards of DOJ funding will be treated fairly according to 28 C.F.R. Part 38.

Faith‑based organizations that receive direct financial assistance from DOJ, or as a subrecipient from L&PS of OJP funding, may not engage in inherently religious activities, such as worship, religious instruction, or proselytization, as part of the programs or services funded with direct financial assistance from DOJ. Organizations that participate in programs funded by direct financial assistance from DOJ: (1) cannot discriminate against program beneficiaries on the basis of religion or religious belief in providing services, and (2) cannot compel beneficiaries to participate in inherently religious activities.

The Omnibus Crime Control and Safe Streets Act of 1968, the Victims of Crime Act, the Violence Against Women Act, and the Juvenile Justice and Delinquency Prevention Act contain express nondiscrimination provisions that prohibit all recipients of federal funding from discriminating on the basis of religion in employment. However, DOJ has concluded that faith-based organizations may consider religion when hiring staff, if the organizations meet certain criteria and apply for and are granted an exemption. Exemptions are granted on a case-by-case basis. Faith‑based organizations seeking this exemption will be required to submit a certification. http://www.ojp.usdoj.gov/about/ocr/pdfs/SampleForCompletionByApplicant.pdf. Further information is available on the DOJ website at <http://www.ojp.gov/about/ocr/employment_practices.htm>.

# System for Award Management (SAM), Data Universal Numbering System (DUNS) and Debarment

**\*\*\*Notice\*\*\***

**Applications without a current SAM registration or a DUNS number are incomplete. No applicant may receive a subaward unless it has provided a DUNS number.**

The details of subrecipient recipient obligations are posted on the Office of Justice Programs web site at <http://www.ojp.gov/funding/sam.htm> (Award condition: Registration with the System for Award Management and Universal Identifier Requirements), and are incorporated by reference here.

A DUNS number is a unique nine-digit sequence recognized as a unique identifier for tracking Federal assistance applicants, recipients, and subrecipients. A DUNS number assignment is free, one-time activity, and can be obtained by applying online at <http://fedgov.dnb.com/webform> or calling 1-866-705-5711.

The System for Award Management (SAM) is the Official U.S. Government system that consolidated the capabilities of CCR/FedReg, ORCA, and EPLS. There is NO fee to register. Applicants for grants (private non‑profits, educational organizations, state and regional agencies, etc.) supported with Federal grant funds must register on-line with SAM at <https://www.sam.gov>. Applicants must update or renew their registration at least once per year to maintain their active status.

All federal programs require a certification from the Subrecipient that it has not been suspended from doing business with any federal department or agency and will comply with the federal debarment and suspension common rule. This certification form is supplied as part of your application template. The federal General Services Administration (GSA) has developed a system to assist federal grantees and subrecipients to find out which people, consultants or contractors have been excluded from doing business with the federal government: <https://www.sam.gov>

Likewise, subrecipients are also expected to comply with state Executive Order No. 34 (March 17, 1976), and State Circular OMB 93-13-GSA regarding debarments, suspensions & disqualifications. The State Department of Treasury has an on-line, searchable database of those individuals, corporations, and agencies who are debarred from conducting business with the State of New Jersey: <https://www.state.nj.us/treasury/revenue/debarment/index.shtml>. In the performance of any grant, Subrecipients cannot conduct business with ineligible firms or individuals who are considered debarred, suspended or disqualified.

# Federal Funding Accountability and Transparency Act (FFATA)

The Department of Justice, Office of Justice Programs, requires the gathering of information to comply with the Federal Funding Accountability and Transparency Act (FFATA) of 2006. FFATA requires the use of the SAM, formerly the Central Contractor Registration (CCR), and the DUNS for each entity applying for a Federal award or subaward.

Subrecipients must complete a FFATA form, including providing their DUNS number and confirming current registration with SAM, and return it with a completed application package.

FFATA calls for the establishment of a single searchable website that is accessible by the public and includes the following information for each federal award:

1. The name of the entity receiving the award;
2. The amount of the award;
3. Information on the award including the transaction type, funding agency, the North American Industry Classification System code or Catalog of Federal Domestic Assistance number (where applicable), program source, and an award title descriptive of the purpose of each funding action.;
4. The location of the entity receiving the award and primary location of performance under the award, including the city, state, congressional district, and country;
5. A unique identifier of the entity receiving award and of the parent entity of the recipient, should the entity be owned by another entity; and
6. Any other relevant information specified by OMB.

For more information about FFATA, visit the <http://www.usaspending.gov>.

# Subrecipient Official File

Subrecipients are required to maintain a master file for subaward documents. The following documents must be available for on-site review by L&PS:

* Application and Award Documents: copies of the approved application for the subaward, the subaward contract, award letter, all project modification requests, grant adjustments, and related written approvals from L&PS.
* Financial and Programmatic Reports: copies of all quarterly detailed cost statements, quarterly programmatic progress reports, and annual reports.
* Personnel Information: copies of all payroll evidence, staff assignment forms, hourly time reports and monthly Time and Activity Reports or and semi-annual certifications; as required.
* Equipment: copies of all purchase orders, receiving documents, bid or competitive quote information, paid vouchers, and inventory data.
* Consumable Supplies: copies of all purchase orders, receiving documents, invoices and paid vouchers.
* Operating Expenses: all space contracts and/or certificates, bid information, purchase orders, invoices, and payments.
* Travel: copies of all travel authorizations, travel vouchers, and payments; copies of training certificates or other proof of attendance.
* Banking Information: cash verification, receipts documentation, check register, canceled checks, and bank statements.

# Reporting Procedures

## Programmatic Progress Reports

To comply with the Government Performance and Results Act of 1993, the federal government also requires the reporting of specific performance measurements. Subrecipients are required to submit **quarterly** programmatic progress reports to L&PS describing project activities for the duration of the award period. Reports are to be submitted to L&PS within **fifteen (15) calendar days** of the end the quarter. Subrecipients will receive reporting forms with their copy of the executed contract/award document. That reporting form will include specific performance measurements applicable to their grant.

If a subaward begins less than a month before the end of a calendar quarter, a programmatic progress report is not due for that quarter. Activities for this shortened period should be accounted for in the subsequent quarterly report.

## Detailed Cost Statement

The Subrecipient is required to submit financial expenditure reports or Detailed Cost Statement (DCS) comparing actual expenditures with the L&PS Approved Project Budget.

Subrecipients are required to submit **quarterly** DCS’s to the L&PS within **fifteen (15) calendar days** of the end of each quarter. For each funding request, a separate State of New Jersey Payment Voucher must be submitted.

## Source Documentation Requirement

All costs charged to federal awards must be adequately documented. *See* 2 C.F.R. § 200.403. All subrecipients must provide supporting source documentation (e.g. invoices, hotel receipts, timesheets, payroll records, purchase orders) with their reimbursement requests.  Subrecipients should be ensuring that their costs are allowable, mathematically accurate and correlate to the source documentation provided. Division grant staff will review all subrecipient source documentation prior to approving reimbursement requests. Costs lacking sufficient support may not be reimbursed.

# Budget Revision and Modification

The grant budget is the approved financial plan to carry out the purpose of the grant. This plan is the financial representation of the project as approved during the grant application and award process.

A. Subrecipients will be required to request a budget revision for the following reasons:

1. Changes in the scope, objective, financial assistance, key personnel, timing of the project or deviations from the approved budget.

2. Need to extend the grant period.

3. Adjustments between cost categories and/or shifts of funding to direct cost categories that are not part of the approved budget.

4. Revisions which involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs.

B. To request a budget revision, subrecipients are required to submit a written explanation (Justification Letter) and a L&PS Grant Adjustment Request Form (GARF); and receive approval.

# Subrecipient Fiscal Responsibility

The Subrecipient must maintain a bookkeeping system, records, and files to account for all grant monies spent and all matching funds contributed to the project. While a preferred system is not specified, subrecipients are expected to conform to accepted accounting standards.

## Financial System

## The Subrecipient is responsible for maintaining an adequate financial management system and will immediately notify L&PS when it cannot comply with these requirements.

1. The subrecipient’s financial management system must meet the requirements set forth in 200 CFR §200.302 - Financial management

2. L&PS may require the submission of an “Accounting System and Financial Capability Questionnaire.”

3. L&PS may review the adequacy of the financial management system of any applicant as part of a pre‑award review or at any time subsequent to the award. If L&PS determines that the Subrecipient’s accounting system does not meet the standards described above, additional information to monitor the grant may be required until the system meets with L&PS’s approval.

### B. Employee Timesheets & Certifications

Subrecipients must keep detailed time reports showing actual time worked on a grant in compliance with 2 C.F.R. 200.430.

Subrecipients must maintain time and activity records that: (1) accurately reflect the work performed, (2) are supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated, (3) be incorporated into the subrecipient’s official records, (4) reasonably reflect the total activity for which the employee is compensated by the subrecipient, and (5) encompass both federally assisted and all other activities compensated by the subrecipient on an integrated basis.

**To satisfy source documentation requirements for reimbursement requests:**

When an employee works solely on one specific grant award, then **at a minimum of every 6 months** both the *employee and supervisor* can prepare and sign an after-the-fact certification that the employee worked 100% of his or her time on the grant award.

Where an employee works on *more than one grant award*, project, or overlapping projects, salary costs must be based on actual time spent on the grant activity. (Hourly time and effort reporting). The applicant must maintain reports reflecting an after‑the‑fact distribution of the actual activity of each employee; account for the total activity of each employee; be prepared at least monthly; coincide with one or more pay periods; and be signed by the employee. Because practices vary as to the activity constituting a full workload (for IHEs, IBS), records may reflect categories of activities expressed as a percentage distribution of total activities. These reports should also be reviewed and approved on a regular basis by a supervisory official having first‑hand knowledge of the work performed. The approving official should document the review and approval by signing or initialing each employee’s time and/or effort report.



# Monitoring of Project Performance

A. The Subrecipient must assure compliance that performance goals are being achieved. Subrecipient monitoring must cover each project, function or activity to monitor performance under grant supported activities to assure time schedules and objectives are being met, projected work units by time periods are being accomplished, and other performance goals are being achieved as applicable.

B. The Subrecipient shall inform L&PS of the following types of conditions which affect project objectives and performance as soon as they become known:

Problems, delays, or adverse conditions which will materially impair the ability to attain project objectives, prevent meeting time schedules by established time periods. This disclosure shall be accompanied by a statement of the action taken, or contemplated, and any L&PS assistance required to resolve the situation.

C. L&PS has an obligation to perform site visits to:

1. Review project accomplishments and management control systems.

2. Provide such technical assistance as may be required.

3. Perform fiscal reviews to ensure grant funds are being properly expended in a timely manner.

4. Ensure compliance with all pertinent conditions, laws, and regulations.