Recipient Guidance - Preparation of Grants and IAAs

December 11, 2015
1 PM Central

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For more information contact: kristin.smith@restorethegulf.gov

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Objective

- Introduce the new Recipient Guidance document
- Provide an overview of materials that are needed when submitting an application for funding to the Council

Note: Additional training will be scheduled and is also available upon request

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Uniform Guidance (OMB) Overview

2 CFR Part 200

Goals
- Increase focus on performance outcomes
- Streamline rules governing allocation of Federal funds

Key Elements
- Focus on performance as well as compliance
- Encourages efficient use of information technology and shared services
- Requires consistent and transparent treatment of costs
- Limits allowable costs to make best use of Federal resources
- Eliminates duplicative and conflicting guidance

Located at 2 CRF Part 200, and available at www.ecfr.gov

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Recipient Guidance Manual

Gulf Coast Ecosystem Restoration Council
Recipient Proposal and Award Guide
for
Grant Recipients
and
Federal Interagency Agreement Servicing Agencies

Recipient Guidance Manual version 1.0
(12-10-2015)

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Recipient Guidance Manual

- Background
  - 2 CFR Part 200
  - RESTORE Act
  - Treasury Rules
- Applies to
  - Grants
  - Interagency Agreements (IAAs)
- Covers entire life cycle of award/agreement
- Both Council Programs - Buckets 2 (FPL) & 3 (SEP)
- Does not provide detailed RAAMS instructions

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Recipient Guidance Manual

- Part I - Proposal Guide: Council-Selected Restoration Component *(Bucket 2)*

- Part II - Proposal Guide: Spill Impact Component *(Bucket 3)*

- Part III - Application Guide *(applies to both components)*

- Part IV - Award and Administration Guide *(applies to both components)*

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General Information

- History
- Gulf Coast Ecosystem Restoration Task Force
- About the RESTORE Act
- About the Gulf Coast Ecosystem Restoration Council
- Comprehensive Plan
- Purpose of the Recipient Proposal and Award Guide
- Council Staff and Roles
- Applicant/Recipient Roles & Council-Recipient Relationship
- Council Electronic Capabilities Status

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Council Staff and Roles

- Program Office
  - Program Officer
  - Director of Environmental Compliance
  - Science Officer
  - Program/Natural Habitat Specialists
  - External Affairs Specialist
  - External Reviewers
    - Science Reviewers

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Council Staff and Roles

- Grants and Compliance Division
  - Grants Officer
  - Grants Specialists
- Administrative Division
  - Fiscal Specialists
  - IT Specialist/System Administrator

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Council Staff and Roles

- Executive Director
- Deputy Executive Director
- CFO/Director of Administration
- General Counsel

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Recipient Roles

- Eligible entity
- Receives award
- Assumes legal and financial responsibility
  - Grants - State or administrative agent
  - IAAs - Federal servicing agency

  - Authorized Organizational Representative (AOR)
    - Empowered to make certifications and assurances
    - Can commit the organization
  - Project Manager/Director or Principal Investigator

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Parts I and II (Pre-Award)

Part I - FPL Proposal Guide
- Based on FPL Submission Guidelines
- Subject to change for future FPLs

Part II – Spill Impact Component
- Planning State Expenditure Plans (SEPs)
- "Full" State SEPs
- Council Review Processes

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Part III – Application Guide

- Applicable to all applications
  - FPL projects
  - SEP projects
  - Grants
  - IAAs
- Provides guidance on eligibility, application contents and other requirements

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Part III – Application Guide

- Chapter 1: Organizational Documentation & Review
- Chapter 2: Application Process
  - A. Who May Submit an Application
  - B. Application Requirements
  - C. Pre-Award Reviews
  - D. Pre-Award Negotiations
  - E. Acceptance and Award Agreements

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Part III – Application Guide

- Chapter 1: Organizational Documentation & Review
- Chapter 2: Application Process
  - A. Who May Submit an Application
  - B. Application Requirements
  - C. Pre-Award Reviews
  - D. Pre-Award Negotiations
  - E. Acceptance and Award Agreements

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How to Apply

- After January 1, 2016, all awards submitted in Restoration Assistance and Award Management System (RAAMS)
- Council's comprehensive electronic grant and IAA management system
  - Pre-award: FPL Proposal or State Expenditure Plan
  - Application for grant or IAA
  - Award
  - Post-award

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RAAMS TRAINING

- In-person hands-on RAAMS Training sessions offered in January
  - Tentative Dates:
    - January 5-6 in Spanish Fort, AL
    - January 14-15 in Baton Rouge, LA
    - January 27-28 in Austin, TX
  - kristin.smith@restorethegulf.gov for more info
- Training is required to receive system access
- RAAMS Users' Guide under development

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2 CFR Part 200 – Pre-Award

Subpart C
Pre-Award Requirements
- (200.200) – Purpose
- (200.201) – Use of Grants Agreement (including fixed amount awards), cooperative agreements, and contracts
- (200.202) – Required to provide public notice of Federal Financial assistance programs
- (200.203) – Notice of funding opportunities

Followed by Official Review
(200.204) – Federal awarding agency review of merit of proposals
(200.205) – Federal awarding agency review of risk posed by applicants

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Organizational Self-Assessment

- Council will conduct risk assessments of "first time" non-Federal recipients *(2 CFR 200.205 Federal awarding agency review of risk posed by applicants)*
- First round of Council awards, all States considered "first time" recipients
- Organizational self assessment must be received prior to or with submission of first grant application
- Then submitted on an annual basis
- Form and instructions available on Council Grants Office website (www.restorethegulf.gov/gcerc-grants-office)

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Organizational Self-Assessment

Series of questions concerning the agency's:

1. Financial management
2. Audit information
3. Operations and general management
4. Procurement
5. Property management
6. Subrecipient management and monitoring

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Federal Registration Requirements

DUNS Number
- Every Council applicant must obtain a unique identifier or DUNS number
- These numbers are free, and can be obtained by contacting Dun and Bradstreet at 1-866-705-5711 or visiting www.dandb.com

SAM
- Every grant applicant must register in the System for Award Management (SAM) database, which automatically registers applicants for
  - Central Contractor Registration (CCR)
  - Eligible Parties List System (EPLS)
- SAM is free and can be found at www.SAM.gov

> See Recipient Guidance Manual Part III Chapter II.A.2

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2 CFR Part 200 – Pre-Award

Subpart C
Develop Application – Pre-Award Requirements
- (200.206) – Standard application requirements
- (200.207) – Specific conditions
- (200.208) – Certifications and representations
- (200.209) – Pre-award costs

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Certifications Part I

- Council Certifications Form
  - Council-specific certifications
  - Certification regarding debarment, suspension and other responsibility matters
  - Certification regarding drug-free workplace requirements
  - Required certifications regarding lobbying

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Certifications Part II

- Assurances
  - Construction Projects (SF-424D)
  - Non-construction Projects (SF-424B)

- Important Notes on "Construction"
  - Includes any project involving or requiring engineering and design or other similar technical documentation
  - For purposes of the SF-424 forms and application budget, also includes land acquisition

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Certifications - continued

Certifications and Assurances
- Signed by Agency AOR
- Form and instructions available on Council Grants Office webpage (www.restorethegulf.gov/gcerc-grants-office)

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2 CFR 200 – Contents of Application

Subpart C Requirement	In RAAMS
• Mandatory Standard Form - SF-424 Application for Federal Assistance	Data Entry
• Non-Construction Forms - SF-424A Budget information - Non-Construction SF-424B Assurances - Non-Construction	Data Entry Upload Attachment
• Construction Forms SF-424C Budget information for Construction SF-424D Assurances for Construction Programs	Data Entry Upload Attachment
• Application Certifications	Upload Attachment
• Any Program-Specific Requirements	TBD
• Detailed Budget Narrative	Upload Attachment
• Program Narrative and Work Plan	Upload Attachment

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Recipient Guidance Manual

Two main components to an application:

1 – Project Information
> Part III, Chapter II, Section B.2

2 – Budget Information
> Part III, Chapter II, Section B.3

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Project Information

- Project information must:
  - Correspond to activities described in the FPL
  - Use best available science

- Details, details, details

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Project Information

In RAAMS

• Project Title	Text Entry
• Project Start and End Dates	Date Entry
• Requested Amount	Text Entry

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Comprehensive Plan Criteria

In RAAMS

• Objectives and goals	Choice list & text narrative
• Emphasis Areas	Choice list & text narrative
• Priority Criteria & Commitments	Choice list & text narrative
• Phases	Choice list

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Project Information

In RAAMS

• Brief project description/ summary (a few sentences)	Text Entry
• Executive summary or abstract (2 pages max – 11 or 12 pt font)	Upload Attachment
• Technical Narrative	Upload Attachment

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Technical Narrative

Methodology / Approach
- What?
- Where?
- Who?
  - Including subrecipients & contractors if known
- How?
- Why?*

* "why" that approach, <u>not</u> a justification for the project

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Methodology / Approach

Detailed enough to determine if:
- Activities are allowable, achievable and attainable
- Approach is feasible
- Best available science is applied
- Budget items correspond to description

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Technical Narrative

- Leveraged funds
- Metrics (Outcomes)
- Milestones

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Technical Narrative - Leveraged Funds

- Type of leveraging
  - Co-funding
  - Adjoining
  - Building on other sources
- Amount ($)
- Source and type of source
- Status of leveraged funding
- Description of leveraging and work to be accomplished

Leveraging should be described in the project description. It is also summarized in RAAMS.

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Technical Narrative - Metrics

- Measures of Success
- Objective
- Quantifiable

- Methodology
- Justification required

- Discuss with program staff prior to submitting application

Metrics and how they will be measured should be described in the project description. Metrics are also summarized in RAAMS for both the baseline and the target conditions.

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Metrics – Examples

Activity/Outcome Name	Approach to Support Ecosystem Restoration	Activity	Metric Name	Metric Description /Instructions	Instructions to the applicant for entering the Activity/Outcome -Metric
Land acquisitions - Acres acquired in fee	Habitat Conservation	Land acquisitions	Acres acquired in fee	Enter the number of acres acquired in fee	When acquiring property in fee always also select the metric "**HM006: Improved management practices - Acres under improved management**"
Marine habitat restoration - Acres restored - SAV	Habitat Restoration	Marine habitat restoration	Acres restored	Enter the number of acres of SAV restored	Enter number of acres of submerged aquatic vegetation restored.
Removal of invasives - Acres restored	Habitat Restoration	Removal of invasives	Acres restored	Enter the number of acres restored	Enter the number of acres restored to native vegetation through the removal of invasive exotics.
Restoring hydrology - Acres with restored hydrology	Habitat Restoration	Restoring hydrology	Acres with restored hydrology	Enter the number of acres with restored hydrology	Can include wetlands and upland buffer/transition habitats.

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Technical Narrative - Milestones

- Milestones or activities
- Deliverables
- Start and End Dates
- Activity-based costing for each "area of effort"
  - Planning
  - Implementation
  - Engineering and Design
  - Data Management
  - Etc.

Milestones and how they will be measured should be described in the project description. Milestones are also summarized in RAAMS and include cost estimates by "area of effort"

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Milestones Examples

Milestone/ Activity	Milestone Type	Start Date	Completion Date	Deliverable (Y/N)	Anticipated Cost ($)
Design structure; produce E&D plan for construction (deliverable)	Engineering and Design	8/2/2016	12/30/2016	Yes	$20,000
Construction of structure (deliverable)	Construction	1/2/2017	6/30/2017	Yes	$250,000
Water Quality Monitoring; quarterly data (deliverable)	Scientific Monitoring/ Metrics	1/2/2017	12/30/2022	Yes	$80,000
Operations and Maintenance	Long-term Operations and Maintenance	7/1/2017	6/30/2022	No	$25,000

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Data

Observational Data Plan:
Describes and guides the collection of any data collected, compiled or utilized as part of a project

Preliminary Observational Data Management Plan:
Ensures observational and compiled data are managed and delivered to Council staff

Interim guidance to be updated with programmatic guidance developed by the Council staff in coordination with the Council Monitoring and Assessment Workgroup (CMAWG)

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Additional Technical Information

- References
- Location Data
  - State
  - Congressional Districts
  - Description
    - Counties if applicable
    - "Gulf-wide"
- Maps
- GIS Shapefiles (if not already provided to Council)

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Environmental Compliance

Compliance with some requirements has already been documented for FPL projects
- National Environmental Policy Act
- Endangered Species Act
- National Historic Preservation Act
- Magnuson-Stevens Fishery Conservation and Management Act
- Fish and Wildlife Coordination Act

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Environmental Compliance

Prior to awarding a grant or IAA under the Council-Selected Restoration Component, the Council must comply with:
- Coastal Zone Management Act
- Coastal Barrier Resources Act
- Farmland Protection Policy Act

The Council will work with the sponsors of each FPL activity to address these laws, as applicable

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Environmental Compliance

- FPL Environmental Compliance Checklist
- Pre-award

Environmental Requirement	Has the Requirement Been Addressed?	Compliance Notes (e.g., status of application, permit number, etc.)
Coastal Zone Management Act	___ Yes ___ No ___ N/A	
Coastal Barrier Resources Act	___ Yes ___ No ___ N/A	
Farmland Protection Policy Act	___ Yes ___ No ___ N/A	

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Environmental Compliance

- Post award, applicants must comply with all other applicable federal environmental laws
- Compliance required before implementation funds are fully disbursed
  - Special Award Conditions
- Awardees responsible for
  - identifying and addressing all applicable federal environmental requirements, and
  - providing the Council with documentation verifying compliance with such requirements.

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Environmental Compliance

- FPL Environmental Compliance Checklist
- Post-award

Environmental Requirement	Has the Requirement Been Addressed?	Compliance Notes (e.g., status of application, permit number, etc.)
Clean Water Act Section 404	___ Yes ___ No ___ N/A	
River and Harbors Act Section 10	___ Yes ___ No ___ N/A	
Marine Protection, Research and Sanctuaries Act	___ Yes ___ No ___ N/A	
Marine Mammal Protection Act	___ Yes ___ No ___ N/A	
National Marine Sanctuaries Act	___ Yes ___ No ___ N/A	
Migratory Bird Treaty Act	___ Yes ___ No ___ N/A	
Bald and Golden Eagle Protection Act	___ Yes ___ No ___ N/A	
Clean Air Act	___ Yes ___ No ___ N/A	
Other	___ Yes ___ No ___ N/A	

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Environmental Compliance

- What to submit?
  - Information from the checklist
  - Status of each requirement
    - Provide as much detail as possible
  - Documentation to support compliance
    - Permit or other application/request documentation
    - Letters of concurrence
    - Permit cover letters
- Contact John Ettinger for assistance

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Recipient Guidance Manual

Two Components to Budget Information:
1. Budget (SF-424 categories)
   - Information contained on:
     SF-424A Budget Information for Non-construction
     SF-424C Budget Information for Construction
2. Budget Narrative
   - Support and justification for budget numbers
   - Uploaded as attachment in RAAMS

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Budget / Budget Narrative

- Proposed budget must be reasonable and consider the technical necessity for and price reasonableness of the proposed budget (*2 CFR 200.404 - Reasonable costs*)
- Budget narrative should describe each cost element in sufficient detail to enable the Grants Management Specialist to confirm whether costs are eligible, allowable, allocable, reasonable, and necessary for the project
- Amounts show in narrative must match those included in budget

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Budget / Budget Narrative

- Eligible
  - Permitted by statute, program guidance, or regulations
  - Must also conform to any Federal limitations
- Allowable
  - Must be necessary and reasonable for the performance of the award and authorized by the appropriate Cost Principles (*2 CFR 200.403 Factors affecting allowability of costs*)
- Reasonable
  - Does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost (*2 CFR 200.404 Reasonable costs*)

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Budget / Budget Narrative

- Allocable (*2 CFR 200.405 Allocable costs*)
  - Cost is allocable to a grant or IAA to the extent that it
    - Benefits the award and can be distributed in reasonable proportion to the benefits received
    - Is incurred specifically for the award
    - Is treated consistently with other costs incurred for the same purpose in similar circumstances
    - Is necessary to the overall operation of the organization and is assignable in part to the Federal award
- Necessary
  - Required for the success of the project

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Cost Principles

- Published by OMB in 2 CFR Part 200
- Establish a uniform approach to determining costs and promote effective program delivery, efficiency, and better relationships between grant recipients, sub-recipients, and the Federal government.
- Help determine allowable costs and enforce compliance with Federal grant requirements.
- Located at 2 CFR 200 subpart E, and effective as of 12/26/14 (www.ecfr.gov)

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Recipient Guidance Manual

Must provide detailed budget information for:

In RAAMS

1. All Council funding requested under the award, including contractual costs	Budget Data
2. All leveraged Co-Funding that is required in order to complete the objectives of the project or program	Budget Data
3. All pass-through or other funding to be provided to Subrecipients to carry out the project or program	Upload Attachment

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2 CFR Part 200 Budget Categories

Subpart C – Develop Application – Budget Categories
The SF-424A form contains the following
- Personnel – (200.430) Compensation - personal services
- Fringe Benefits – (200.431) Compensation - fringe benefits
- Travel – (200.474) Travel costs
- Equipment – (200.439) Equipment and other capital expenditures
- Supplies
- Contractual
- Construction
- Other
- Indirect Charges – (200.414) Indirect (F&A) costs.

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Personnel

- Refers to salaries and wages paid to employees of the applicant who are directly involved in grant implementation.
- Does not include contractors or personnel hired by a subrecipient
- What to include:
  - Position by title or functional role
  - Amount of compensation
    - Unit cost
    - Unit
  - Amount of time devoted to project

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Personnel – Budget Example

Position/Role	Unit Cost	Unit	%Time (devoted to project)	Quantity	Computation	Total
1 Data entry	$20	per hour	n/a	500 hours	$20 x 500	$10,000
3 Technicians	$35,000	annually	50%	3 years	$35,000 X 0.5 X 3x3	$157,500
					Total Personnel	$167,500

These numbers must be supported and justified in the Personnel section of the Budget Narrative. The positions or roles and how each contributes directly to the project or program must be explained in the Budget Narrative and/or the Technical Narrative.

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Fringe Benefits

- Refers to the allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages
- Include, but are not limited to, the costs of leave (vacation, family-related, sick or military), employee insurance, pensions, and unemployment benefit plans
- Should be based on actual known costs or an established formula
- For salaried personnel listed in Personnel and only for the percentage of time devoted to the project
- Fringe benefits on overtime hours limited to FICA, Workman's Compensation, and Unemployment Compensation

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Fringe Benefits – Budget Example

- What to include:
  - Identify the organization's fringe benefit rate
  - Explain the base for the calculation for each position identified

Position (s)	Total Compensation (life of project)	Fringe %	Total Fringe Benefit (life of project)
Technicians (3)	$157,500	32	$50,400
		Total Fringe	$50,400

The fringe benefits budgeted and the fringe benefit rate must be described and supported in the Fringe Benefits section of the Budget Narrative. The positions or roles and how each contributes directly to the project or program must be explained in the Budget Narrative and/or the Technical Narrative.

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Travel

- Refers to the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the applicant
- May be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided:
  - Method used is applied to an entire trip and not selected days of the trip
  - Results in charges consistent with those normally allowed in like circumstances in the applicant's non-federally funded activities and in accordance with applicant's written travel reimbursement policies
- Does not include travel expenses of a contractor or subrecipient

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Travel - continued

- Indicate the estimated number of trips, number of travelers, points of origin and destination, and purpose of travel
- Provide a justification indicating how each trip (or type of trip) is needed to achieve the goals and objectives of the project or program
- What to include for each trip:
  - Itemize estimated travel expenses of project personnel
    - Transportation
    - Subsistence costs
  - Show the basis of computation for each type of travel expense (e.g., current airline ticket quotes, past trips of a similar nature, federal government or organization travel policy, etc.)

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Travel Benefits – Budget Example

Purpose of Travel	Destination	# Trips	# Travelers	Item	Quantity or Rate	Computation	Total
Monitoring	Bay of St. Louis	10	2	Per diem	$94	10x2x94	$1880
Monitoring	Bay of St. Louis	10	2	Travel-mileage	245 mi.	245x0.545x10	$1335
						Subtotal Monitoring	$3135

The travel must be described and supported in the Travel section of the Budget Narrative. How the travel is necessary and contributes directly to the project or program must be explained in the Budget Narrative and/or the Technical Narrative.

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Equipment

- Refers to tangible personal property (including information technology systems) having:
  - a useful life of more than one year, and
  - a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the applicant for financial statement purposes, or $5,000
- Does not include maintenance or rental fees for equipment (include in the "Other" line item)
- Expendable items should be included in the "Supplies" category

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Equipment – What to Include

- Where applicable, analyze the cost benefits of purchasing versus leasing equipment, especially high cost items and those subject to rapid technical advances
- For each item or type of item:
  - Brief Description
  - Indicate the estimate unit cost for each item to be purchased
  - Provide the basis for cost estimates
  - Briefly justify the need for items of equipment to be purchased (i.e., explain how the equipment is necessary for the success of the project)
  - Describe the procurement method to be used (*Procurement Standards 2 CFR 200.317 - 200.326*)

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Supplies

- Refers to all tangible personal property other than those classified as equipment
- Generally, include any materials that are expendable or consumed during the course of the project
- Note on computing devices
  - A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the applicant for financial statement purposes or $5,000, regardless of the length of its useful life

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Supplies – What to Include

- Itemize material and supply estimates by the nature of the expense (e.g., office supplies, postage, training materials, copying paper, etc.)
- Provide the basis for cost estimates or computations (e.g., vendor quotes, prior purchase of similar or like items, etc.)
- Provide a justification for the use of each item or type of item and relate it to specific project activities

(*Procurement Standards 2 CFR 200.317 - 200.326*)

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Other Direct Costs

- Refers to direct costs that do not fit any of the other line item categories, such as rent for buildings used to conduct award activities, utilities and/or leased equipment, transportation expenses, tuition for training, etc.
- What to include:
  - List and describe items (e.g., rent, reproduction, telephone, janitorial or security services, equipment maintenance, etc.) by major type
  - Provide the basis for cost estimates or computations. (e.g., for rent, provide the square footage and the cost per square foot or a monthly rental cost and how many months of rent are proposed)
  - Briefly justify the need for the item (i.e., explain how it is necessary for the success of the project)

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Budget Examples – Equipment, Supplies, Other Direct Costs

Object Class	Item Name/Description	Unit Cost	Quantity	Total Cost
Equipment	Portable, Wireless HAZMAT Weather System	$5870	1	$5870
Supplies	Stormwater Sampler (Dual-Bottle)	$2090	3	$6270
Other Direct Costs	Cellular service for automated samplers	$53	36 months	$1908

These items must be described and supported in the appropriate section(s) of the Budget Narrative. How the item is necessary and contributes directly to the project or program must be explained in the Budget Narrative and/or the Technical Narrative.

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Contracts and Subawards

- Refers to
  - Subawards to carry out all or a portion of the project or program
  - Contractual purchases of property or services needed to carry out the project or program under a Federal award
- Different requirements in 2 CRF Part 200 for subrecipients and contractors

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Contractors vs. Subrecipients

- Recipient to make case-by-case determination for each agreement (*2 CFR 200.330 Subrecipient and contractor determinations*)

Subrecipient	Contractor
Programmatic decision-making responsibilities	Provides goods & services as part of normal business
Performance is measured against program objectives	Goods & services are ancillary to programmatic activities
Responsible for Federal compliance requirements	Operates in a competitive environment
Mechanism = Subaward	Mechanism = Contract/Purchase Order

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Contracts and Subawards

- What to include:
  - Name of contractor or subrecipient if known
    - If not known, indicate TBD
  - Whether entity is a contractor or a subrecipient
  - Method of selection
    - If sole source, include detailed justification
  - Period of performance
  - Scope of work
  - Method of accountability

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Contracts and Subawards - continued

- What to include:
  - For contractors
    - Estimated cost
  - For subrecipients
    - Separate itemized estimated budget
    - Use appropriate object class categories
- Post-award selection of subrecipients

  If the subrecipient is not known when the application is submitted, the information on the previous slide, including the itemized budget, must be submitted to the Council before the subaward is granted by the recipient.

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Procurement – 2 CFR Part 200

Subpart D - Post Federal Award Requirements Standards for Financial and Program Management Procurement Standards

§ 200.317 Procurements by states

§ 200.318 General procurement standards

§ 200.319 Competition

§ 200.320 Methods of procurement to be followed

§ 200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms

§ 200.322 Procurement of recovered materials

§ 200.323 Contract cost and price

§ 200.324 Federal awarding agency or pass- through entity review

§ 200.325 Bonding requirements

§ 200.326 Contract provisions

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Construction

- "Construction" includes
  - Traditional construction (structures, etc.)
  - Any project involving or requiring engineering and design or similar technical documentation
  - Land Acquisition
- Additional budget categories required
  - Include information from both
    - SF-424A Budget Information for Non-construction
    - SF-424C Budget Information for Construction

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Construction Budget Object Classes*

- Administrative and legal expenses
- Land, structures, rights-of-way, appraisals, etc. (including easements)
- Relocation expenses and payments
- Architectural and engineering fees
- Other architectural and engineering fees
- Project inspection fees
- Site work
- Demolition and removal
- Construction
- Equipment
- Miscellaneous

Describe each in the same level of detail as provided for non-construction items in the Budget Narrative. How the item is necessary and contributes directly to the project or program must be explained in the Budget Narrative and/or the Technical Narrative.

* From SF-424C Budget Information for Construction Projects

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Indirect Costs (2 CFR 200.414)

- Costs incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited without effort disproportionate to the results achieved
- Estimate of shared overhead costs
- Example -If three grant programs share one office it would be time consuming and difficult to figure out what percentage of each program is using the utilities, Internet, phone, etc.

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Indirect Cost Limitation

- Recipient Administrative Costs capped under 33 U.S.C. § 1321(t)(1)(B)(iii)(I) and 31 C.F.R. § 34.204
- Not more than three percent of the amounts received by a recipient from the RESTORE Council may be used for administrative costs
- Administrative costs defined by Treasury Regulations
    - Those indirect costs for administration that are allocable to activities authorized under the Act
- Grant recipients may charge indirect costs to a grant under an approved Negotiated Indirect Cost Rate Agreement (NICRA), up to the 3% cap
- Instructions for calculating maximum allowable indirect costs available on the Grants Office webpage

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Indirect Costs and Subrecipients

- Subrecipients not subject to administrative cost limitation
- If charging indirect costs for subrecipients, must submit copy of subrecipient's Negotiated Indirect Cost Rate Agreement (NICRA)

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Program Income (2 CFR 200.307)

- Gross income earned by the recipient that is directly generated by a supported activity or earned as a result of the award during the award period
- Excludes interest earned on advances and includes, but is not limited to, income from service fees, conference fees, sale of commodities, usage or rental fees, and royalties on patents and copyrights.
- Recommended that applicants carefully consider whether any program income may be generated or earned during the award period and disclose any such anticipated income in the application

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Program Income (2 CFR 200.307)

- What to include if program income is anticipated
    - Type/source of program income (e.g., rental fees, usage fees, sale of equipment, etc.)
    - Estimated amount that will be generated
    - How program income will be tracked and monitored (i.e., receipt, obligation, and expended)

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Pre-Award Costs (2 CFR 200.209)

- Apply to grants only
- Costs incurred prior to the effective date of the grant directly pursuant to the negotiation and in anticipation of the grant where such costs are necessary for efficient and timely performance of the scope of work
- Allowable only to the extent that they would have been allowable if incurred after the grant award date and only with the written approval of the Grants Officer
- Incur at your own risk!

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Pre-Award Costs (2 CFR 200.209)

- Include in total budget
- Must also provide separate document with application that specifically addresses any pre-award costs
  - Uploaded as attachment in RAAMS
- What to include if requesting
  - Amount requested as pre-award costs
  - Date costs were incurred
  - Budget breakdown by object class category including a budget narrative and justification for each item
  - Justification for incurring the costs prior to award
  - Description of any impact for the project if the pre-award costs are not approved
  - Detailed cost data (e.g., purchase orders, contracts, agreements, etc.)

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Co-Funding

- Definition – Costs will be shared across funding from two or more sources to complete the project or program; the leveraged funding from all sources is required in order to achieve the project or program objective
- Detailed budget required for each co-funding source
  - Use same SF-424 budget categories
- Level of description in Budget Narrative and Technical Narrative is dependent upon the complexity of the activities and funding streams

- *Example – the estimated cost of a single project to backfill a canal in order to restore hydrology to 50 acres of marsh is $1 million; the State proposes to provide $200,000 in available GOMESA funding and is requesting $800,000 in RESTORE funding to complete the project.*

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Cash Forecasting

- Forecast anticipated cash requirements (draws) throughout the life of the award
- Semi-annual forecast based on Federal fiscal year
  - Oct 1 to Mar 30
  - Apr 1 to Sept 30
- Total Forecast must enter amount requested
- Entered directly into RAAMS
- Updated with semi-annual reporting

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Part IV – Award & Administration

- Award Agreement and Period of Performance
- Award Administration
  - Reporting
  - Subrecipient Monitoring and Management
  - Adjustments to Awards
  - Records Management
  - Closeout
  - Single Audit
- Recipient Standards
  - Financial Management
  - Procurement
- Other Post Award Requirements & Considerations

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Appendices

- Definitions
- Lists
- Forms

Additional resources available on the Council and Grants Office webpages (www.restorethegulf.gov/gcerc-grants-office)

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Next Steps & Resources

- Developing new tools and templates to assist in preparing grant and IAA applications
  - Will be available on the Grants Office webpage
- RAAMS Training
- RAAMS User's Guide
- Additional Training on Grants and IAA Management (post-award) to be developed and announced

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Questions

Please do not hesitate to send any questions to the Council staff

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