



2023 Specialty Crop Block Grant Program – Farm Bill

Idaho State Department of Agriculture

Overview

- SCBG Overview
- Quarterly Ledgers
- Travel
- Procurement
- Equipment vs. Supplies
- Ledger Credits
- Unallowable Costs
- Performance Reporting
- Budget Revisions
- Pass-through entity requirements



SCBG Overview

- As a subrecipient you are required to adhere to all the USDA Terms & Conditions as well as all ISDA rules and regulations as set forth in your Disbursement Agreement
- Please review these documents carefully and reach out to ISDA with any questions. The Terms and Conditions vary slightly each year.
- Remember: it is **ALWAYS** better to ask for permission in advance than to ask for forgiveness afterwards. 😊

SCBG Overview

Must ALSO follow applicable cost principles:

- 2 CFR Part 220: Educational Institutions
- 2 CFR Part 225: State, Local, and Tribal Governments
- 2 CFR Part 230: Non-Profit Organizations
- 2 CFR Part 3052: OMB Circular A-133 Audit Requirements

Quarterly Ledgers - Sample

2019		Specialty Crop Block Grant: <i>Title: Your Project Title Here</i>					
		<i>Entity: Sub-Recipient Name Here</i>					
		For the Period: <u>October 1 - December 31</u>				2019	
Quarterly Financial Report - Grant Funds Only							
Payment Method	Date	Vendor	Backup documentation on label (A-Z)	Line item description *As listed on approved Line Item Budget*	Corresponding Budget Category *From approved Line Item Budget*	Expenditures occurring during this Quarter	Funds remaining
TOTAL AWARD							\$ 50,000.00
Credit Card	11/21/2019	Alaska Airlines	A	Economy Flight for John Smith to attend conference	Travel	\$ 500.00	49,500.00
Credit Card	11/21/2019	Enterprise Rental Car	B	Rental Car for John Smith to attend conference	Travel	\$ 115.00	49,385.00
Credit Card	11/23/2019	JW Marriott Hotel	C	Lodging for John Smith to attend conference	Travel	\$ 340.00	49,045.00
CK# 1001	11/24/2019	The Ad Agency	D	Creation of Marketing Brochures	Contractual	\$ 2,500.00	46,545.00
CK# 1001	11/24/2019	The Ad Agency	E	Printing Cost of Marketing Brochures	Contractual	\$ 375.00	46,170.00
							46,170.00
							46,170.00
							46,170.00
							46,170.00
							46,170.00
							46,170.00
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							46,170.00
							46,170.00
							46,170.00
							46,170.00
							46,170.00
Totals					AMOUNT TO BE DISBURSED:	\$3,830.00	\$ 46,170.00

Name of Person Submitting Ledger _____

Date _____

Ledgers - Overview

Before submitting Quarterly Ledgers:

- Check the **Title** to make sure it matches what is listed in the Agreement. Please do NOT change the title to your own liking. It needs to match the project name.
- Check **Period Date Range** (No overlapping ledgers, and it needs to correlate to dates on back-up documentation).
 - If back-up documentation does not match ledger period, provide explanation as to why
- Check to make sure all fields have been completed for all ledger entries (i.e. check# or invoice#, date, vendor, line item description, budget category, expenditure, etc.).
- *Please check to make sure that everything you are submitting is part of your approved work plan.*

Ledgers – Budget Categories


Use only defined USDA budget categories and match them to your budget and work plan

Seven Budget Categories Specified by USDA

- Personnel
- Fringe
- Travel
- Equipment
- Supplies
- Contractual
- Other



Ledgers - Overview

- Count only expenses for that quarter
 - (if there is an expenditure from a previous quarter provide an explanation as to why it was not on previous ledger – i.e. Had not received invoice yet)
- Make sure each column is filled out on Ledger
- Email ledger. This email will act as a digital signature. 
- Provide proper supporting documentation for all expenses



Ledgers – Back up Documentation

Per [USDA- AMS Terms & Conditions](#):

“Recipients must collect and maintain **source documentation** associated with costs incurred as a result of the Federal award and make it available to AMS upon request. Source documentation includes, but is not limited to: receipts, canceled checks, paid bills, payrolls, time and attendance records, contracts, invoices, and sub award documents. If recipients pays a portion of the total amount indicated on the source document, it must appropriately identify the specific expenses and total amount charged to the grant.”

Source Documentation

USDA Site Visit to ISDA - 2013

- Through interviews with staff and a document review it was determined that ISDA **did not originally collect source documentation in accordance** with 7 CFR Part 3016.20(b)(6) and 2 CFR Part 225 Appendix A ¶C.1.j, which requires that accounting records be supported by adequate source documentation for ISDA to determine that costs are necessary and reasonable, allocable, and allowable. **Consequently, all of the subgrant files for both grant agreements reviewed during the site visit (12-25-B-1065 and 12-25-B-1225) were incomplete.**

Ledgers – Back up Documentation

- All entries on each ledger must be supported by source documentation and a general ledger report. Please make sure the source documentation is legible and we can tell exactly what was purchased and charged to the ledger.
- If there is an unusual charge, please explain why it is relevant to the project. Feel free to write on the receipt or invoice.

Ledgers – Back up Documentation

For U of I example, label the itemized expenditure report, Chrome River Report AND individual receipt

Operating Expenses

E5724 Research Supplies

14-APR-21	Z1016088	NT Popovl Pcard Recon 404745 Agilen	369.11	D C B A E
14-APR-21	Z1016088	PopavIn 404745 Ellsworth Reagents n	118.48	
14-APR-21	Z1016088	PopavIn 404745 IDEX Consumables nee	48.54	
14-APR-21	Z1016088	PopavIn 404745 ThermoFisher Consuma	480.82	
14-APR-21	Z1016088	PopavIn 404745 ThermoFisher Consuma	170.32	

Financial Summary

	Total (USD)
Total Expenses Reported	2,842.40
Less Company Paid	2,842.40
Amount Due Expense Owner	0.00

Expense Summary

Expense Type	Total (USD)
Supplies	2,842.40
Total	2,842.40

Allocation

Allocations Charged		Total (USD)
826717-224188 ISDA SCBG Nematode Control	826-02ORO-AGPOPI-	818.16 A, B, C, E
826727-223922 USDA APHIS FY19 PCN Eradication MM	826-02ORO-AGMOR	1,655.13
826907-221394 NIFA Phosphorus Management	826-02ORO-AGSTR	369.11 D
Total		2,842.40

Expense Details

Report ID: 0100-2240-4745

Expense Report

NT Popovl PCard Recon 02/15-02/28/2021

Item	Date	Alert	Cost Code	Type	Disb Amt	Pay Me Amt
7	02/26/2021		E5724	Supplies	48.54 USD	0.00 USD
Business Purpose Description						
Popavin 404745 IDEX Consumables needed for sample analysis						
Receipt Attached: Yes Firm Paid: Yes Source: University of Idaho USBank P-Card						
Banner Index	826717-224188	826-02ORO-AGPOP	ISDA SCBG Nematode C	AGPOPI - Popova, Inna	48.54 USD	B
Account Merchant						
E5724 IDEX						
8	02/26/2021		E5724	Supplies	118.48 USD	0.00 USD
Business Purpose Description						
Popavin 404745 Ellsworth Reagents needed for sample analysis						
Receipt Attached: Yes Firm Paid: Yes Source: University of Idaho USBank P-Card						
Banner Index	826717-224188	826-02ORO-AGPOP	ISDA SCBG Nematode C	AGPOPI - Popova, Inna	118.48 USD	C
Account Merchant						
E5724 Ellsworth						
9	02/27/2021		E5724	Supplies	369.11 USD	0.00 USD
Business Purpose Description						
Popavin 404745 Agilent Technologies Consumables needed for sample analysis						
Receipt Attached: Yes Firm Paid: Yes Source: University of Idaho USBank P-Card						
Banner Index	826907-221394	826-02ORO-AGSTR	NIFA Phosphorus Mana	Leave Location Code blank	369.11 USD	D
AGSTRD - AG Strawn, Daniel G.						
Account Merchant						
E5724 Agilent Technologies						

Ledgers – Back up Documentation

- Submit receipts for **all** expenses.
- Ensure costs are reasonable, allowable, and allocable.
- Maintain accurate records.
- Keep records for at least three years following grant end date per the Disbursement Agreement.



Ledgers – Back up Documentation

Splits/Cost Share

- If you are splitting the cost of something (supplies, airfare etc.), with another project and only charging a portion of the invoice/receipt to your Specialty Crop Block Grant project then you need to include the other program code you are using to bill the other portion(s) to on the invoice/receipt. We need to keep track if it's another SCBG project.
- A split must make sense as well. It can be split by percentage, unit cost, acreage etc. However, it cannot just be an arbitrary number to make it work within the budget. Random splits raise **red flags** and give the appearance that what you are charging to the SCBG project is not an accurate account of what should be allocated.
- If you are splitting travel costs, be consistent. Example: all airfare, lodging, per diem is split at 50% with another project. Do not split airfare in half and then charge 100% of per diem to another project, but all of the lodging to this project.

Ledgers – Back up Documentation

Personnel/Salaries/Fringe

- Must provide payroll reports that show employees paid, dollar amount paid for each (broken down between salary and fringe), time period or pay date for each period paid, and grand total salary and fringe costs, that match what was reported on the ledger.
- For hourly employees: Provide timesheets or reports (can be incorporated into the payroll report) that show each employees **hours worked** for each pay period that is included in the ledger request. Cannot do a percentage of time unless the employee is paid 100% by the grant.
- For salaried employees: Complete the Exempt Employee Time Reporting Affidavit form provided by ISDA for each salaried employee.
- Any deviations such as payroll incurred in a prior period needs documentation addressing why the payroll was not reported in the correct period and supporting documentation to verify the dates and hours worked.
- If there are any deviations from the work plan and budget on who is doing work on the grant, you must let ISDA know **before** requesting it on ledger for payment.

Ledgers – Back up Documentation

Personnel continued --

- Provide a staff list with the first ledger to identify who is working on the project and their role
- Submit an update anytime staff changes

PERSONNEL

#	Name/Title	Level of Effort (# of hours OR % FTE)	Funds Requested
1	John Doe, Research Technician Sr.	25% year 1, and 20% year 2	\$15,248
2	MS student	50% each year	\$24,000
3	Summer worker1	240 hours each year	\$5,760
4	Summer worker 2	240 hours each year	\$5,760
5	Research Technician	15% each year	\$10,166
6	IH worker	135 hours each year	\$3,240

Ledgers – Back up Documentation

Travel

- All travel is governed by the State Travel Policy. See: <http://www.sco.idaho.gov/web/sbe/sbeweb.nsf/pages/trvlpolicy.htm>
- Check all travel costs against what was written in your work plan (i.e. mode, type, timeframes, conferences identified, etc.).
- Individuals who travel must match the work plan (i.e. employee A was identified as the sole traveler but travel costs for other employees are included - these would not be allowed without first asking for approval).
- Prior approval from ISDA is required before deviations from the work plan can occur.

Ledgers – Back up Documentation

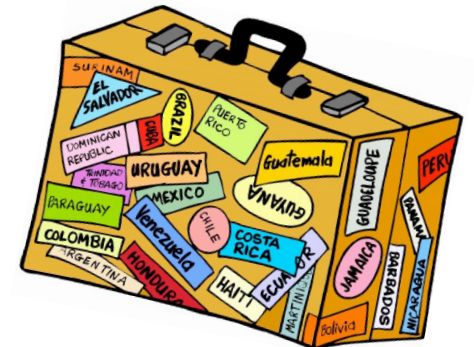
Travel – Vehicles

- If you are claiming mileage for travel, then you cannot also claim direct vehicle expenses such as fuel, lube, etc. It is one or the other, but not both. If there are direct expenses such as lube and fuel for equipment such as tractors, then please explain on the receipt or ledger.
- Motor Pool and Fleet Vehicles - For mileage, provide the beginning and ending odometer readings, vehicle number, purpose of trip, destination, and traveler name. ISDA will NOT reimburse more than the Federal mileage rate regardless of what your own travel policy may state.
- Personal Vehicles – For mileage, provide the beginning and ending odometer readings with origination and destination or provide a map showing the origination and destination points with number of miles traveled, traveler name(s), and purpose of trip.
- Rental Cars - Provide a copy of the rental car receipt, gas receipts with dates, purpose of trip, destination, and traveler's name.

Ledgers – Back up Documentation

Travel – Hotel

- Hotel bills need to include the name of the traveler and dates of the stay. Names of additional room guests (if room was shared) should be written on the invoice.
- All Travel-Allowable with **prior** approval from USDA and ISDA, if not already included in the work plan or budget.



Ledgers - Back up Documentation

Meals

- They are considered per diem expenses and must be in accordance with the State Travel Policy or Federal GSA policy if out of state.
- If attending a conference or meeting, provide a copy of the agenda and note if any meals were provided.
- Per diem is only allowable while in official travel status per ISDA Travel Policy
 - Official travel status is when traveler is physically away from their official primary workplace by a distance of 50 miles for a minimum of 12 hours.
- Under State Travel Policy, lunch within 50 miles of workplace is not eligible.

Ledgers - Back up Documentation




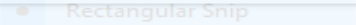


Airfare

- All airfare must be included in the budget; if not, prior approval from ISDA and USDA is required.
- Foreign travel must also comply with the Fly America Act, 49 U.S.C. 40101 *et. seq.* Use United States and EU member air carrier service for all travel and cargo transportation services funded by the United States Government. When traveling between countries, if there is not U.S. Carrier available, a foreign carrier may be used. If it is a code share, the flight must be booked with the U.S. carrier flight number.
- Must provide receipt that shows all payments for flights and itineraries
- Airfare purchased must be a coach or economy ticket – if you want to fly first class or business class you would need to pay the upgrade to first class out of non-grant funds. Documentation must show that upgrade was paid separately.
- “Airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable”
 - Unrestricted airfare is fully-refundable and fully-changeable
- **Any deviation** – you must print quote for unrestricted flight on **same day** of purchase

Ledgers - Back up Documentation

Airfare (continued)- Unrestricted Flight

Fri, Mar 16, 2018

2:54 pm  4:44 pm		Nonstop
Boise, ID, US (BOI)		Denver, CO, US (DEN)
		1h 50m total
 UA 357	Airbus A319	
Revise flight		Details
MileagePlus earnings:		Base award miles
		3250
		974 1.5 650
Boise, ID, US (BOI) to Denver, CO, US (DEN)		United Economy (B)
2:54 pm - 4:44 pm (1h 50m)		(unrestricted)
 UA 357 Airbus A319		Snacks for Purchase
 Wi-Fi		

Select Offer

1. Economy Plus®

+ \$77 per person

Select

Ledgers - Back up Documentation

Airfare (continued)- Unrestricted Flight

Mon, Mar 19, 2018

Flight Details		Select Offer	Choice Offer	
7:48 pm Denver, CO, US (DEN)	9:49 pm Boise, ID, US (BOI) Nonstop 2h 1m total	1. Economy Plus® + \$78 per person Select	1. Economy Plus® 2. Premier Access® + \$119 per person Select	
MileagePlus earnings: Base award miles PQM PQS PQD		3225 974 1.5 645	3225 974 1.5 645	3225 974 1.5 645
Denver, CO, US (DEN) to Boise, ID, US (BOI) 7:48 pm - 9:49 pm (2h 1m) UA 453 Airbus A320 Wi-Fi		United Economy (B) (unrestricted) Snacks for Purchase	Economy Plus Travel Options bundle	Economy Plus and Premier Access Travel Options bundle

Printed quote will have date of quote at bottom. Must be printed the same date actual airfare was purchased

[View fare rules and restrictions](#) | Additional baggage charges may apply

Total \$1,415.10

Ledgers - Back up Documentation

Procurement/Bidding

- Does your organization have its own procurement policy? If so, please send a copy to ISDA. If not, the Idaho State Policy will need to be followed: <https://purchasing.idaho.gov/>
- Procurement procedures must be followed for purchases that equal or exceed \$15,000 (aggregated) for software, other property, and a mix of goods and services; OR \$25,000 or more for services only. If any contracts/services/equipment purchase meets this threshold, procurement procedures must be followed prior to signing contracts, engaging services or purchasing equipment.
- Vendors and purchases approved in the work plan are not exempt from the procurement process.
- Appropriate procurement documentation must be submitted before ledger payments can be made. This includes:
 - Request for proposal
 - Three (3) Bids
 - Competitive Selection Process
 - Notification of winning bid



Ledgers - Back up Documentation

Contractual Costs

- When submitting contractual costs make sure they match what was written in the work plan and budget
- Major contracts (\$15,000 for software, other property, and a mix of goods and services OR \$25,000 for services only) must be documented in the file with a copy of the contract between the subrecipient and the contractor in addition to copies of the procurement documents.
- Submit the copy that has been signed by BOTH parties.
- Provide detailed receipts showing the products or services purchased.
- Contracts for less than \$15,000 OR \$25,000 (respectively per above) do not need to be submitted to USDA.

Ledgers - Back up Documentation

Equipment Purchases (Tangible Items Over \$5,000)

- All equipment purchases must have prior approval from USDA.
- Make sure all equipment costs correlate with what is written in your work plan and budget.
- If any individual equipment purchase equals or exceeds \$15,000, procurement documentation must be submitted before expenses are paid.
- Special Purpose vs General Purpose – general purpose equipment are unallowable under the grant. Special purpose equipment may be allowed.
- Inventory Tracking for Equipment: Annually you must sign a form, provided by ISDA, which will verify location of equipment. Additionally, ownership of equipment must be retained for life. If you want to dispose of equipment there are stringent federal disposal requirements. If so, let us know and we will work on the process with you.

Ledgers - Back up Documentation

Supplies (Tangible Items Under \$5,000)

- Check all supplies against what was written in the work plan. If supplies are not in the work plan, but essential for the project, provide a justification.
- Make sure supplies are actually supplies and not equipment.
- If you need to change the type of supplies that are listed in your work plan and budget, notify us for approval beforehand of the change.
- Office supplies such as printer toner, printers, paper, pens, pencils, etc. are considered “shared use supplies” that fall into overhead cost categories and will not be allowed.
 - If requesting reimbursement of office supplies, provide concrete justification of how the supplies will be used solely for the project.

Ledgers - Back up Documentation

Supplies

- Internal Journal entries such as U of I Chemstores are not sufficient
- Chemstore backup with actual item purchased must accompany the journal entry

Journal Voucher Accounting

Seq#	Description							BudPd	Curr	Doc Ref	Accr	Bank	D			
	COA	FY	Pd	Rucl	Index	Fund	Orgn	Acct	Prog	Actv	Locn	Proj	Total	D/C	NSF	
1	Chemstores/Randall													55.71	+	
	V	21	12	ISSU	826717	224188	826	E5741	02ORO	AGPOPI			55.71	+		
1	Chemstores/Randall													55.71	+	
	V	21	12	GRAR		224188	826	1212	02ORO	AGPOPI			55.71	+		
1	Chemstores/Randall													55.71	+	
	V	21	12	GRRV		224188	826	R3711	02ORO	AGPOPI			55.71	+		
1	Chemstores/Randall													23.66	C	
	V	21	12	ISIU		150029		1301					23.66	C		

Item: Issue/Print/Up Query F050503 6.9 (P) (PROD P)

NSF Checking Y
 Document Text N
 Complex Y
 Accounting Total 55.71
 Commodity Total 55.71

Quantity Requested
 Quantity Remaining
 To Be Issued
 External Rate 0.01
 External Cost 0.06

Primary Location	Sub Location	Issue or Return Quantity
CRSTOR	8001	
	Total	

Activity AGPOPI
 Location
 Project
 Percentage 100
 Amount 55.71
 NSF Override N
 Suspense N
 NSF Suspense N

U0137935

Ledgers - Back up Documentation

Other

Publication Costs

- Allowable if in work plan and budget
- Provide copy of published article
- USDA acknowledgement is required on printed materials they have strict guidelines. Please check in with ISDA prior to ensure compliance.

Registration Fees/Conferences

- Allowable only if in work plan and budget
- Registration fees are allowable for attendance at conference if necessary to accomplishing project or program objectives
- Conferences are allowable if the primary purpose of attendance is dissemination of technical information and/or is reasonable for successful project performance under the grant
- Travel must be approved in the work plan



Ledgers- Proof of Payment

Proof of payment is required for all expenses. Acceptable proof of payment may include:

- Copies of checks paid to vendor
- Copies of wire transfers made to vendor
- Copies of credit card statements and corresponding payment made to credit card company (copy of check payment or electronic payment verified on credit card statement)
- Report from an acceptable accounting system

Ledgers – Credit Balance

- Ledgers that incur credit balances require the same approval process.
- All entries on the ledger must be supported by source documentation and a general ledger report.
- Submit receipts for **all** expenses.
- Ledgers with a credit balance will need to be resolved in the subsequent quarter or ISDA may request for a refund of overpayment.

Unallowable Costs

Costs need to be directly attributable to the grant project's goals and objectives and be included in the approved workplan and budget

Indirect Costs Unallowable by ISDA

- We do not accept indirect costs for reimbursement under the grant

Tuition Unallowable by ISDA

- We do not accept tuition as a cost under the grant
 - Some states do allow it but we have decided not to because tuition covers all of a student's educational course work and does not correlate directly to work done on the grant

WRITTEN REPORTS

Annual Progress Reports

- Annual Progress Reports are due by November 15th of each year.
- List objectives and outcome indicators exactly as written in approved application
- Give detailed summary of accomplishments, challenges and upcoming activities
- Use format provided by ISDA found at ISDA's Specialty Crop Block Grant section of the website

ANNUAL REPORT

ANNUAL PROJECT REPORT TEMPLATE

PROJECT INFORMATION

Project Title	Enter Project Title as Stated on the Grant Agreement.		
Recipient Organization Name:	Enter Recipient Organization Name.		
Recipient's Project Contact			
Name:	Enter the Project Contact's Name.		
Phone:	Enter the Project Contact's Phone Number.		
Email:	Enter the Project Contact's Email.		

PROJECT REPORT

Annual Report Type:	Enter the Type of Annual Report (e.g., 1st Annual, 2nd Annual).			
Reporting Period:	Start Date:	Enter Date.	End Date:	Enter Date.

PERFORMANCE NARRATIVE

ACTIVITIES PERFORMED

Address the below sections as they relate to this reporting period.

ACCOMPLISHMENTS

Estimate the Total Percentage (%) of Work Completed on the Project Enter Percent%

List your accomplishments or activities for this period of performance, and indicate how these accomplishments assist in the fulfillment of your project's objective(s), identifying the specific objective(s) from the Accepted Project Proposal.

#	Accomplishment/Activity	Relevance to Objective
1		
2		
3		
4		

CHALLENGES AND DEVELOPMENTS

Provide any challenges to the completion of your project or any positive developments outside of the project's original intent that you experienced during this reporting period. If those challenges or developments resulted or will result in corrective actions and/or changes to the project, include those in the space below.

#	Challenge or Development	Corrective Action or Project Change
1		
2		
3		
4		

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WRITTEN REPORTS

Final Report

- Due November 15th following the end of the project
- List objectives and outcome indicators exactly as written in approved application
- Give detailed summary of accomplishments and any challenges
- Use format provided by ISDA found at ISDA's Specialty Crop Block Grant section of the website

FINAL PERFORMANCE REPORT

FINAL PROJECT REPORT TEMPLATE

PROJECT INFORMATION

Project Title	Enter Project Title as Stated on the Grant Agreement.			
Recipient Organization Name:	Enter Recipient Organization Name.			
Period of Performance:	Start Date:	Enter Date.	End Date:	Enter Date.
Recipient's Project Contact				
Name:	Enter the Project Contact's Name.			
Phone:	Enter the Project Contact's Phone Number.			
Email:	Enter the Project Contact's Email.			

PERFORMANCE NARRATIVE

PROJECT BACKGROUND

Provide enough information for the reader to understand the importance or context of the project. This section may draw from the background and justification contained in the approved project proposal.

ACTIVITIES PERFORMED

Address the below sections as they relate to the entire project's period of performance.

OBJECTIVES

Provide the approved project's objectives.

#	Objective	Completed?	
		Yes	No*
1			
2			
3			
4			

**If no is selected for any of the listed objectives, you must expand upon this in the challenges and lessons learned sections.*

ACCOMPLISHMENTS

List your accomplishments for the project's period of performance, including the impact they had on the project's beneficiaries, and indicate how these accomplishments assist in the fulfillment of your project's objective(s), outcome(s), and/or indicator(s).

#	Accomplishment or Impact	Relevance to Objective, Outcome, and/or Indicator
1		

Award Years 2016 Forward
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Amendments – Budget Revisions

- ALWAYS ask in advance for changes in your project.
- Written approval from ISDA must be obtained in advance for a revision of the project budget that exceeds 10% of the total budget or 10% of a budget category.
- Budget revisions that do not exceed the 10% threshold do not need a formal revised workplan, but ISDA notification is required.
- USDA must approve in advance any changes to the scope, objectives, or outcomes/indicators. Also, the addition of any equipment, travel, or a new contractor needs pre-approval.
- To request budget changes, submit the following:
 - Explanation of why change is needed
 - Revised workplan
 - ~~Strike through items to be removed and~~ highlight all additions.

Questions on topics to this point?



Additional Training for Pass-through entities coming up next

Relevant Definitions

- **§2 CFR 200.74 Pass-Through Entity** – a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.
- **§2 CFR 200.92 Subaward** – an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.
- **§2 CFR 200.93 Subrecipient** – a non-Federal entity that receives a subaward from a pass-through entity to carry out a part of a Federal Program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.
- **Contractor** – a non-Federal entity that receives a contract for the purpose of providing goods and services for the awarding non-federal entity's own use. The contract creates a procurement relationship with the contractor.

Subrecipient VS. Contractor

- **CHARACTERISTICS OF A SUBRECIPIENT:**

- The entity has the ability to make decisions about how services will be delivered.
- The entity is carrying out completion of the goal of the grant (or part, if applicable) as stated in the award.
- Funding to the entity depends on the entity's ability to best meet the objectives of the award. Although performance is measured against Federal award objectives, the entity assumes little risk if the objectives are not met.
- The entity will be reimbursed for only actual costs incurred.

Subrecipient VS. Contractor

- **CHARACTERISTICS OF A CONTRACTOR:**

- Procurement policies were applied in the selection of the entity.
- The entity's proposed price was a factor in the selection process.
- The entity will derive a profit from the agreement.
- The entity provides the same goods or services to other organizations.
- The entity's normal business is to provide the goods or services being purchased in the agreement.
- The entity assumes financial risk if they fail to deliver the goods or services agreed upon.

You Have a Subrecipient – Now What?

§2 CFR 200.311 contains the requirements for pass-through entities. These requirements **MUST** be met to be in compliance with Federal regulations.

Overview

- Pass-through Entity Acknowledgement
- Written subrecipient monitoring plan
- Contract between Pass-Through entity and Subrecipient
- Risk Assessment
- Audit
- Site Visit
- Record Keeping

Pass-Through Entity Requirements

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

On next slide

Pass-Through Entity Requirements

- Federal Award Identification
- Federal Award Identification Number (FAIN)
- Federal Award Date of award to the recipient by the Federal agency
- Subaward Period of Performance Start and End Dates
- Amount of Federal Funds obligated by this action by the pass-through entity to the subrecipient
- Total Amount of Federal Funds Obligation to the subrecipient by the pass-through entity including current obligation
- Total Amount of Federal award committed to the subrecipient by the pass-through entity
- Federal award project description
- Name of Federal awarding agency, pass-through entity, and contact information for awarding office of the pass-through entity
- Catalog of Federal Domestic Assistance (CFDA) Number and Name
- Identification of whether the award is Research and Development

Recommend covering the above information in a contract

Pass-Through Entity Requirements – Subrecipient Monitoring

The activities of the subrecipient must be monitored as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward, and that the subaward performance goals are achieved.

In other words, the goals of subrecipient monitoring are:

- Determine compliance
- Identify and prevent any deficiencies
- Design corrective action to improve

Pass-Through Entity Requirements – Risk Assessment

RISK ASSESSMENT- Evaluate each subrecipient's risk (before award) of non-compliance with Federal statutes, regulations, and the terms and conditions of the subaward. §2 CFR 200.205 provides an explanation of risk analysis. Areas to look at to determine risk include:

- Size and complexity of the program (total dollar amount of award, lots of procurements, excessive travel in budget)
- Past Performance (prior written approval for activities and/or purchases, timely submission of required reporting, previous non-compliance issues)
- Policy Management Systems (internal controls to guide the grant process and ensure regulations are followed)
- Audit (does the entity receive a single-audit and if yes, have there been any material findings related to the grant?)

Consider imposing specific subaward conditions upon a subrecipient, if appropriate, as described in §2 CFR 200.207 (additional reporting requirements, additional monitoring etc.) Special conditions may be applied even after the project has been awarded and may change throughout the term of the grant.

Pass-Through Entity Requirements – Audit Review

AUDIT REVIEW: Per 2 CFR Subpart- F §200.501 - A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year.

- The \$750,000 is cumulative among all Federal monies expended by that entity (not just the Specialty Crop Block Grant)

Determine if the subrecipient receives a single-audit. If they do receive a single-audit, the audit must be obtained and reviewed for any material findings related to the grant. If there are any material findings related to the grant, there must be documentation as to corrective action and follow up with the subrecipient. This must be done on an annual basis throughout the term of the grant.

Pass-Through Entity Requirements – Site Visit

SITE VISIT: At least one site visit to the place of performance must be conducted over the term of the grant (for each subrecipient). During the site visit the following actions must be performed and documented:

- Meet with the Principal Investigator (PI) on the project if possible, or other persons working directly on the project if the PI is unavailable.
- If any equipment (as defined by the USDA-AMS Terms & Conditions) was purchased using grant funds, verify that it is on site.
- Go over the current status of the project and any issues that may be occurring; develop a plan for the resolution of any problems if necessary.

Pass-Through Requirements – Record Keeping

- Per the USDA-AMS Terms and Conditions the “recipient must retain all records relating to the grant for a period of **three years** after the final SF-425 is received by AMS or until final resolution of any audit finding or litigation. See §2 CFR 200.333 for exceptions and qualifications to the retention requirement and period for other types of grant-related records, including property records.”
- Records to retain include contracts, amendments, budget revisions, quarterly ledgers and their proper backup documentation, any semi-annual or annual reports as required by the grant agreement, risk assessments & subrecipient monitoring performed, single-audit reviews, and any other pertinent general correspondence.
- Equipment verification and documentation must be kept in perpetuity.

What's Next?

- The following documentation must be provided within 30 days of the acknowledgement:
 - Monitoring plan detailing how your organization will meet these requirements
 - Fully executed contract between your organization and your subrecipient
 - Risk assessment evaluating your subrecipient's risk of non-compliance
- ISDA will follow up regarding progress being made on the requirements as well as address any challenges you might be experiencing.
- **PLEASE reach out regarding ANY questions you may have.**

Resources

- §2 CFR 200.331 Requirements for Pass-Through Entities
- Subrecipient VS. Contractor Checklist- from the Association of Government Accountants (AGA)
- Subrecipient Monitoring and Self-Assessment Guide- from AGA
- USDA-AMS Terms & Conditions

Questions?

