IOWA ECONOMIC DEVELOPMENT AUTHORITY DOWNTOWN HOUSING GRANT

Compliance Readiness Webinar





Agenda

- Grant Recap
- Grant Agreement Terms / Reimbursement Requirements
- 2 CFR Part 200 Overview / Requirements
- Procurement Documentation Requirements
 - Proof of Purchase to Vendor
 - Proof of Purchase from Vendor
 - ⁻ Proof of Payment
- Internal Time Reporting Documentation Requirements
 - Timesheet
 - Proof of Pay Rate
 - Payroll Register
- IowaGrants Correspondence Training
- Questions & Answers

Downtown Housing Grant Recap

- The Downtown Housing Grant Program provides financial assistance for projects that support local downtown revitalization through the creation of new housing opportunities in communities with populations of 30,000 or less.
- The period of performance for the Downtown Housing Grant is the MOU execution date to September 30, 2026.
- Note that all funds need to be obligated by December 31, 2024 but can be expended until December 31, 2026.



Grant Agreement Terms

- The Downtown Housing Grant is paid out to Subrecipients on a reimbursement basis.
- Subrecipients must demonstrate a minimum 25% match contribution prior to receiving any grant funds. The 25% minimum match can be in the form of developer loan, developer cash contribution, or deferred developer fee.
- The first draw request can be submitted once 60% of the sub-grant amount is expended and the required 25% minimum match has been met.
- Final draw request can be submitted for 40% of sub-grant amount upon substantial completion as determined by IEDA and the remaining match indicated in Exhibit A.
- Reimbursement requests are to be submitted through lowaGrants.
- Final reimbursement to be requested and finalized by September 30, 2025.

Downtown Housing Reimbursement Requirements

When submitting for reimbursement, the following are needed:

- Draw Request Reimbursement Form
- Draw Request Itemization
- Documentation of developer loan, developer cash contribution, or deferred developer fee that totals 25% of the award amount developer fee
- Cancelled checks, invoices, receipts, staff time or payrolls
- Data completion or similar reports generated from the approved HMIS or DVIMS system
- Development Agreement between Grantee and Project Developer



If a portion of your 25% private match includes an in-kind donation, consider the following:

In-Kind donations must meet the following criteria as outlined in <u>§200.306</u>:

(1) Are verifiable from the non-Federal entity's records;

(2) Are not included as contributions for any other Federal award;

(3) Are necessary and reasonable for accomplishment of project or program objectives;

(4) Are allowable under subpart E of this part;

(5) Are not paid by the Federal Government under another Federal award, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs;

(6) Are provided for in the approved budget when required by the Federal awarding agency; and

(7) Conform to other provisions of this part, as applicable.

§200.306 – subpart E:

Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by the non-Federal entity. In those instances, in which the required skills are not found in the non-Federal entity, rates must be consistent with those paid for similar work in the labor market in which the non-Federal entity competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.



Downtown Housing Grant's Funding Source

- Funding for the Downtown Housing Grant was provided to the State of Iowa from the American Rescue Plan Act ("ARPA") of 2021.
- As a Subrecipient of a Federal award, it is imperative that all Downtown Housing projects are facilitated in accordance with 2 CFR Part 200 and its applicable appendices.
- It is the responsibility of each Subrecipient to be aware and remain in compliance with all applicable federal regulations throughout the grant period.
- Note that failure to comply with federal regulations can result in your request for reimbursement to be denied in partial or entirety.

- 2 CFR Part 200 details the uniform administrative requirements, cost principles, and audit requirements for Federal awards to IEDA and/or the Subrecipients of Federal awards.
- Cost principles determine the allowable costs incurred by IEDA and/or the Subrecipients of a Federal Award.
- Audit requirements set the standards for consistency and uniformity among the Federal agencies for the audit of IEDA that expend the Federal awards.
- **Key Detail**: The procurement of goods and services should be competitive and weed out fraud, waste, and abuse.
- You can view 2 CFR 200 through this link

Unique Entity Identifier & System for Award Management (SAM)

- Each Subrecipient of a Federal award is responsible for registering with SAM.gov and obtaining a unique entity identifier (UEI). (<u>2 CFR Appendix-I-to-Part-200 D.3.</u>)
- Note that once an UEI is assigned, additional steps will be required to activate the entity registration.
- Each registration will remain active for one calendar year. It is the responsibility of each Subrecipient to ensure that annual renewal procedures are completed in a timely manner.
- Subrecipient registrations must maintain an active status throughout the duration of the grant period.



Procurement Policies

- All Subrecipients of a Federal award are required to have a written procurement policy. (<u>2 CFR 200.318(a)</u>)
- Each procurement policy will be required to be submitted to IEDA / RSM.
- Ideally, procurement policies should contain purchasing thresholds that each require its own rules for purchasing goods or services. These thresholds will be evaluated to the 2 CFR Part 200 thresholds and the more stringent thresholds will be evaluated when testing.
- Note that during review, procurement thresholds are evaluated at the aggregate vendor level. That means full contract, invoice, and receipt totals will be assessed for the threshold, regardless of whether the items are specific to the awarded project.
- Please ensure that all procurements are well documented. All applicable
 procurement documentation must be submitted to the review team with your
 request for reimbursement.



Procurement

- Each Subrecipient will provide procurement documentation for all material and service costs during the reimbursement process through lowaGrants.
- Procurement documentation must demonstrate how you determined to source the materials or services, such as quotes, RFBs, bid tabulations, change orders, etc in concurrence with 2 CFR Part 200.
- Most often, material and service cost expense support will include a form of original proof of purchase to vendor (ex: purchase order or contract), proof of purchase from vendor (ex: receipt, pay application, or invoice), and proof of payment (ex: cancelled check, redacted bank statement) within the period of performance.

Common Procurement Methods & Thresholds

- Micro-Purchase Threshold (< \$10,000)
 - Purchases under this threshold typically do not require formal procurement methods (<u>2 CFR 200.320(a)(1)</u>)
- Small Purchase Threshold (\$10,000.01 < \$250,000)
 - Purchases within this threshold typically require quotes prior to purchasing (<u>2 CFR 200.320(a)(2)</u>)
- Simple Acquisition Threshold (≥ \$250,000)
 - Purchases made above this threshold require competitive procurement procedures (formal bids, etc.) (<u>2 CFR 200.320(b)</u>)
- Noncompetitive Procurement (<u>2 CFR 200.320(c)</u>)
 - Aggregate dollar amount does not exceed the micro-purchase threshold
 - Item is only available from a single source
 - Public exigency or emergency will not permit any delay
 - The Federal Awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request
 - Note that IEDA will not be authorizing any requests for a noncompetitive procurement
 - Competition is determined to be inadequate after solicitation of a number of sources

At a minimum, the **proof of purchase to the vendor** (ex: contract / purchase order) must include:

- Name of the vendor
- Organization / Subrecipient name (as stated in Grant Agreement)
 - Subrecipients should disclose any aliases used in the support provided to help prevent additional processing time.
- Date that falls within the period of performance
- Description of the goods or services to be purchased
- Rate / cost of the goods or services to be purchased
- If procuring services, a contract must be provided between the Subrecipient and the vendor to demonstrate that the services are in-scope and all rates are preset

Note that not all expenses may not require a contract and/or purchase order.



Contracts: Appendix II of 2 CFR Part 200

- Appendix II of 2 CFR Part 200 contains required provisions that should be included in all contracts made under Federal awards.
- Please ensure all vendor contracts include the applicable provisions.
- For all future contracts, statements, and certifications of compliance or the Appendix II required verbiage (if applicable) will be accepted.
- For all contracts previously executed, please contact the vendor to add an addendum that covers any required provisions that were not included in the original contract draft.
- The link to Appendix II of 2 CFR Part 200 can be found here.



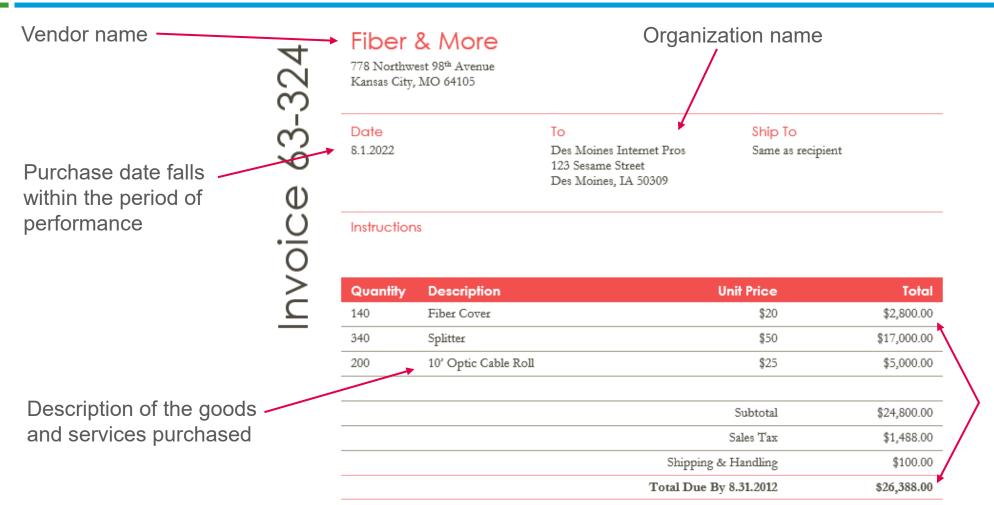
Procurement: Purchase Order Example



- At a minimum, the **proof of purchase from the vendor** (ex: invoice, receipt, pay application) must include:
 - Name of the vendor
 - Organization / Subrecipient name (as stated in Grant Agreement)
 - Applicants should disclose any aliases (or parent/subsidiary relationships) used in the support provided to help prevent additional processing time.
 - Date that falls within the period of performance
 - Description of the goods or services purchased
 - Rate / cost of the goods or services purchased



Procurement: Invoice Example



Rate / cost of goods

Thank you for your business!

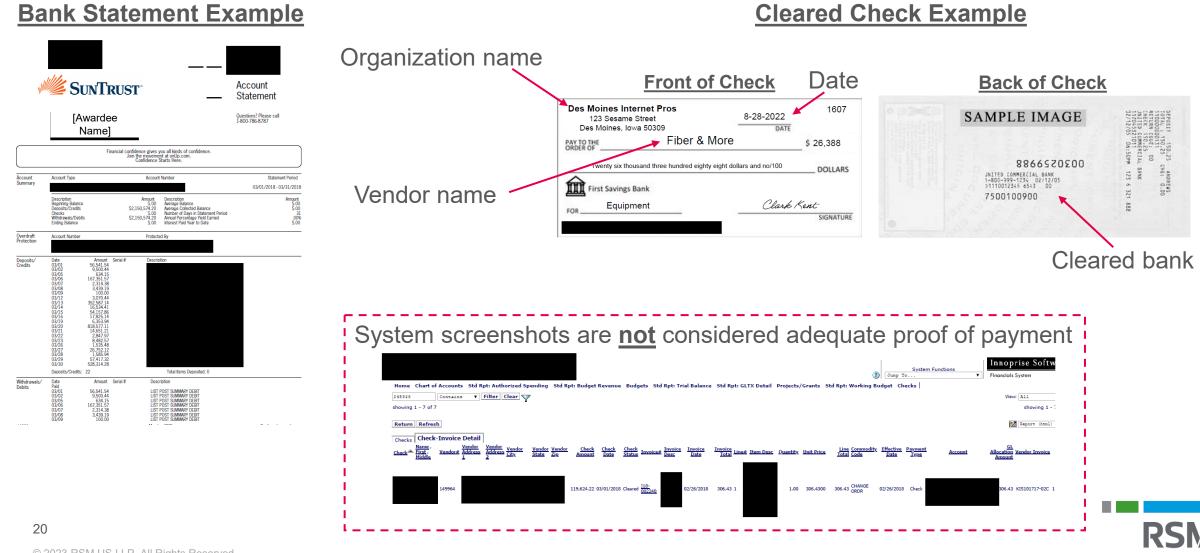


Procurement: Proof of Payment

- At a minimum, the **proof of payment** (ex: cleared check, redacted bank statement) must include:
 - Name of the vendor
 - Organization / Subrecipient name (as stated in the Grant Agreement)
 - Applicants should disclose any aliases used in the support provided to help prevent additional processing time.
 - Payment date
 - Amount
 - Note that if the payment includes multiple invoices, a batch detail will need to be provided that can demonstrate that the affiliated invoice was included with the payment.
 - Proof that the payment has cleared the bank
- A screenshot from the financial or accounting system is <u>not</u> considered adequate proof of payment.



Procurement: Proof of Payment Examples



- Each Subrecipient will provide payroll documentation during the reimbursement process through IowaGrants if internal personnel wages are included with reimbursement request.
- Most often, payroll support will include timesheets, proof of pay rates, and payroll registers; however, RSM will work with you to provide reasonable documentation to comply with 2 CFR Part 200.
- Federal Award programs are subject to the Freedom of Information Act. As such, it is recommended that Subrecipients redact any sensitive information on payroll (and proof of payment) documentation up to the amount that is not needed to prove reasonable documentation.



Internal Time Reporting: Timesheets

- At a minimum, the **timesheet** must include:
 - Employee ID, name, or another common identifier
 - Organization / Subrecipient name (as stated in Grant Agreement)
 - Work dates that are within the period of performance
 - Description of the services and/or work performed
 - Total number of hours worked for the pay period across all applicable employees
- The timesheet may also be known as an activity log and may apply to salary or hourly employees.
- In instances where the claimed employee is salaried and system timesheets are not a standard, ensure that all project hours are tracked and documented.



Timesheet Example

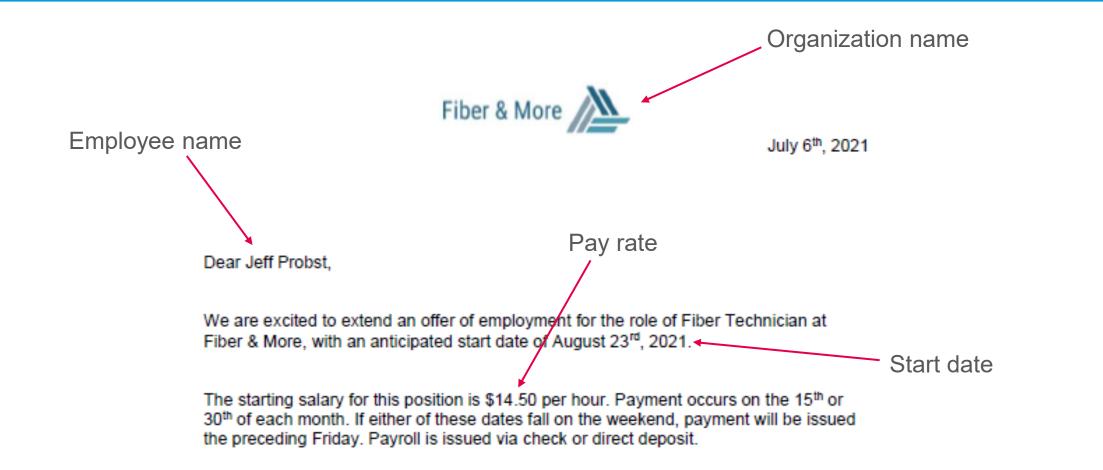
	First Up C	Consulta	nts ←			— Or	ganization na	me	Time Sheet
	Employee Name	John Smith		E	mployee ID	36		Start Date	6/15/2022
Employee	Manager:	Andrew Smith						End Date	6/19/2022
name & ID								Pay Date	6/30/2022
	Date	In	Out	In	Out	Regular hrs.	Activity		
	6/15/2022	8:00	11:00	12:00	18:00	8.00	Patrol Area	_	
	6/16/2022	8:00	11:00	12:00	18:00	8.00	Grant - Architectural ┥ Review		scription of the
	6/17/2022	8:00	11:00	12:00	18:00	8.00	Patrol Area	WO	rk performed
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) ata warkadia	6/20/2022								
Date worked is	6/21/2022								
vithin the period					Regular Hours	40.00	+	Total n	umber of hours worked
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					Hourly rate	\$20.00			
					Total pay	\$800.00			
					Employee sign	ature			Date
					Manager signo	ature			Date
23									

RSM

Internal Time Reporting: Proof of Pay Rate

- At a minimum, the **proof of pay rate** must include:
 - Employee's ID, name, or another common identifier
 - Employee's position / title within the organization
 - Organization / Subrecipient name (as stated in Grant Agreement)
 - Employee's pay rate for the pay period claimed
 - Effective pay rate date
- If pay rates are listed on the payroll register provided, then no other additional pay rate documentation is needed.
- Screenshots of payroll systems may be allowable on a case-bycase basis if no documentation of approved pay rates is available.

Proof of Pay Rate Example

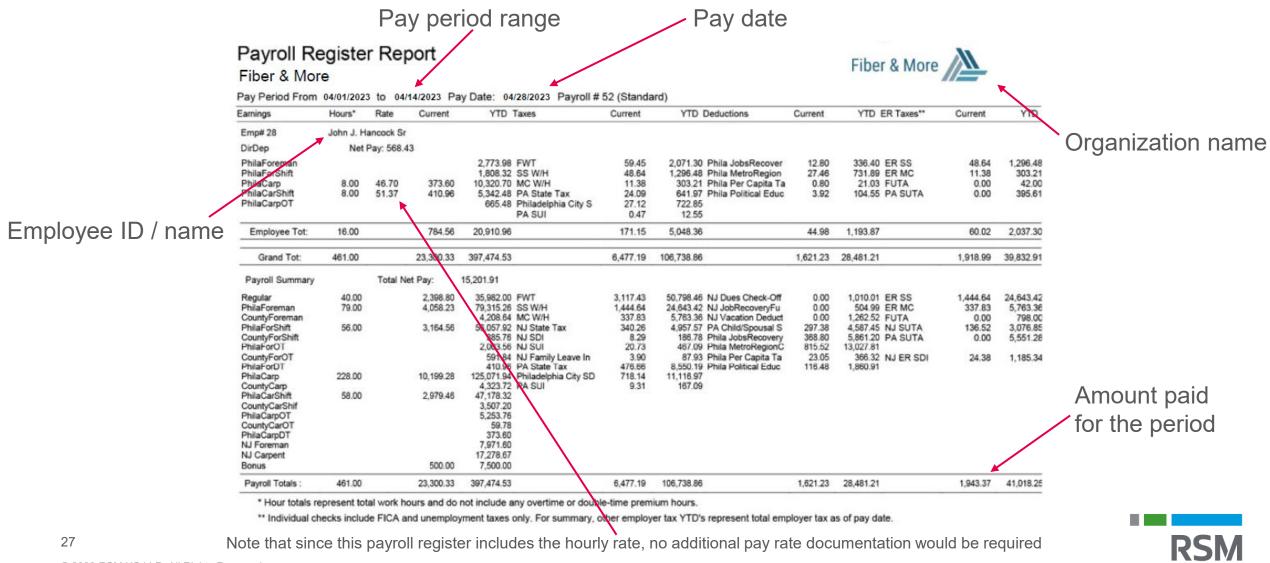


RSM

Internal Time Reporting: Payroll Register

- At a minimum, the **payroll register** must include:
 - Employee ID, name, or another common identifier
 - Organization name
 - Pay period dates covered in payroll run (range)
 - Pay date that is within the period of performance
 - Amount paid for the period

Payroll Register Example



Subrecipients should use the Correspondence Portal within lowaGrants to communicate with the review team.

IowaGrants is the system of record; since the UST has until 2032 to audit any of these funds, this will allow us to maintain all records until that time.

IowaGrants Correspondence Training

1. Select "Click Here to Access Single Sign on Tool" and sign in.

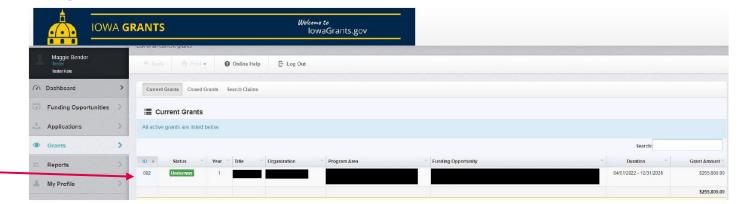
	₽ Login		
~		Click Here To Login	Announcements
	Click Here to Acc	cess Single Sign On Tool	*** NEW SYSTEM LOGIN PROCESS FOR ALL USERS ***
	(1) Interested in the c	urrent posted Opportunities?	All lowaGrants Users MUST always utilize the Single Sign On Tool to sign into lowaGrants. (It is the first option under "login" at the top of the page with the blue background.) "You will never use any of the other fields on this page.
	View Current F	Funding Opportunities	Login instructions and a short video are available here, https://dom.iowa.gov/iowa.grants-login
			Contact your program manager should you have questions.
	1 DISABLED (IOWA	USERS DO NOT USE)	
	User ID		
	Password		
		SIGN IN	



2. Select "Grants"



3. Select applicable grant





4. Select "Correspondence"

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				Component			Last Edited	
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				Budget NOFA #0	07		Apr 7, 2022 12:00 AM -	
				Contract Amend	ments			
				Funding Opport	inity			



5. Select "Add Grantee Correspondence"

002 -							
Status:	Underway						
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Funding Opportunity:			ļ.				
Organization:							
Grantee Contact:							
Program Officer:							
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Flag Sent/Received From To	Subject	Message	Attachment 1	Attachment 2	Attachment 3 Attac	hment 4 A	Attachment 5
12/01/2022	Grant 002 - Hello	testing					



6. Add "RSM Program Manager" in the "To" field (this is the **ONLY** account you should be sending correspondence to)

- 7. Add a subject
- 8. Draft your message
- 9. Attach files, if needed
- 10. Send correspondence

Inter-System Grantee C	orrespondence
Flag:	
6 T o*:	То
CC addresses must be entered in a valid email format, i	i.e. name@domain.org. Use a semicolon (;) to separate multiple CC email addresses.
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Attachment 1:	Select file
9 Attachment 2:	Select file
Attachment 3:	Select file











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