

IOWA ECONOMIC DEVELOPMENT AUTHORITY
NONPROFIT INNOVATION ASSISTANCE FUND

Compliance Readiness Webinar



June 1, 2023



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

Nonprofit Innovation Assistance Grant Recap

- The Nonprofit Innovation Assistance Grant Program provides 501(c)3 nonprofits with transformational vertical infrastructure improvements for new construction or renovation/rehab.
- The period of performance for the Nonprofit Innovation Assistance Grant is September 14, 2022 to September 30, 2026.
- Note that all funds need to be obligated by September 30, 2024, but can be expended until September 30, 2026.

Grant Agreement Terms

- The Nonprofit Innovation Assistance Grant is paid out to Subrecipients on a reimbursement basis.
- Eligible costs include construction costs (labor and materials), site acquisition, site development, building permit fees, and engineering and architectural services.
- Subrecipients are required to demonstrate a minimum match of 10%.
- Reimbursement requests are to be submitted through IowaGrants.
- Final reimbursement to be requested and finalized by September 30, 2024. IEDA will disburse no funds after September 30, 2026. (Section 3.3 Grant Agreement)

Nonprofit Innovation Assistance Reimbursement Requirements

When submitting for reimbursement, the following are needed (in IowaGrants):

- Draw Request Reimbursement Form
- Draw Request Itemization that lists all expenditures submitted for reimbursement
- GAX (General Accounting Expenditure) Form
- Request for Reimbursement and Certification of Compliance Form
- Additional documentation that may be required:
 - Copies of cancelled checks, invoices, receipts, staff time tracking, or payroll (for grant and non-grant funds)
 - Data completion or similar reports generated from the approved HMIS or DVIMS
 - Development Agreement
 - Documentation that all project financing has been secured for the project

Nonprofit Innovation Assistance Grant's Funding Source

- Funding for the Nonprofit Innovation Assistance 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 Nonprofit Innovation Assistance 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.

What is 2 CFR Part 200?

- 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). ([2 CFR Appendix-I-to-Part-200 D.3.](#))
- 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. ([2 CFR 200.318\(a\)](#))
- 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 IowaGrants.
- 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).

Common Procurement Methods & Thresholds

- Micro-Purchase Threshold (< \$10,000)
 - Purchases under this threshold typically do not require formal procurement methods ([2 CFR 200.320\(a\)\(1\)](#))
- Small Purchase Threshold (\$10,000.01 < \$250,000)
 - Purchases within this threshold typically require quotes prior to purchasing ([2 CFR 200.320\(a\)\(2\)](#))
- Simple Acquisition Threshold (\geq \$250,000)
 - Purchases made above this threshold require competitive procurement procedures (formal bids, etc.) ([2 CFR 200.320\(b\)](#))
- Noncompetitive Procurement ([2 CFR 200.320\(c\)](#))
 - 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

Procurement: Proof of Purchase

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 pre-set

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

Purchase Order

July 17th, 2022

Purchase date falls within the period of performance

Organization name

Des Moines Internet Pros
123 Sesame Street
Des Moines, Iowa 50309
515-987-6543
Contact@DSMInternetPros.com

Vendor name

Supplier:
Fiber & More
778 Northwest 98th Avenue
Kansas City, Missouri 64105
123-456-7890
Purchasing@FiberandMore.com

Description of the goods and services purchased

DESCRIPTION	PRICE	QUANTITY	AMOUNT
Fiber Cover	\$20	140	\$2,800
Splitter	\$50	340	\$17,000
10' Optic Cable Roll	\$25	200	\$5,000
		Subtotal	\$24,800
		Estimated Sales Tax	\$1,488
		Estimated Shipping & Handling	\$100
		Order Total	\$26,388

Rate / cost of goods

Procurement: Proof of Purchase

- 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

Vendor name

Fiber & More

778 Northwest 98th Avenue
Kansas City, MO 64105

Organization name

Date

8.1.2022

To

Des Moines Internet Pros
123 Sesame Street
Des Moines, IA 50309

Ship To

Same as recipient

Purchase date falls within the period of performance

Invoice 63-324

Instructions

Quantity	Description	Unit Price	Total
140	Fiber Cover	\$20	\$2,800.00
340	Splitter	\$50	\$17,000.00
200	10' Optic Cable Roll	\$25	\$5,000.00
Subtotal			\$24,800.00
Sales Tax			\$1,488.00
Shipping & Handling			\$100.00
Total Due By 8.31.2012			\$26,388.00

Description of the goods and services purchased

Rate / cost of goods

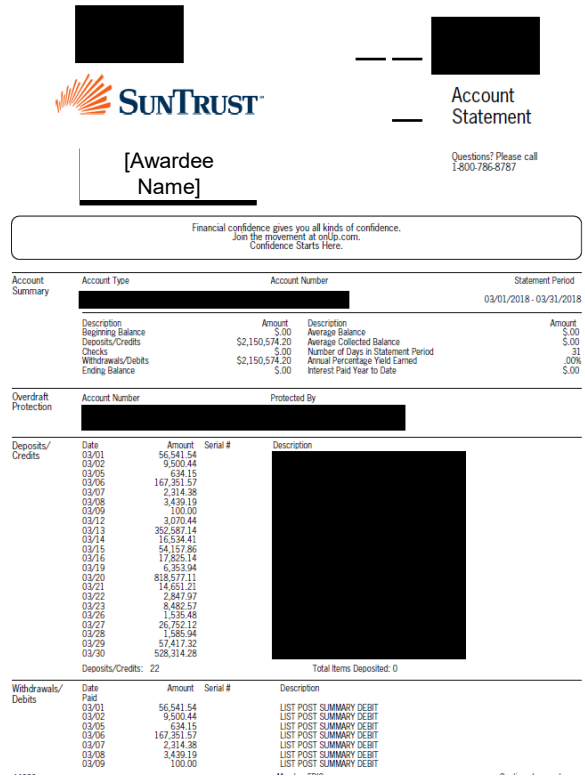
Thank you for your business!

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 **not** considered adequate proof of payment.

Procurement: Proof of Payment Examples

Bank Statement Example



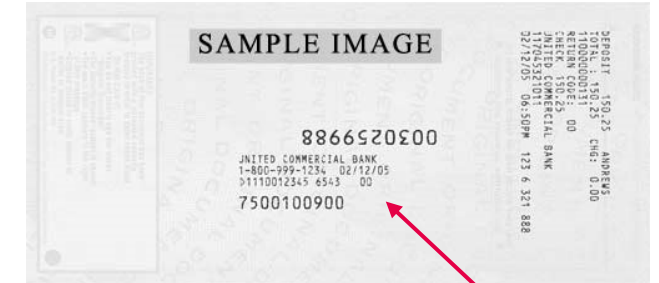
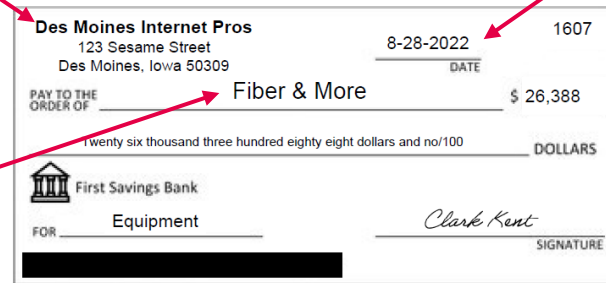
Cleared Check Example

Organization name

Front of Check Date

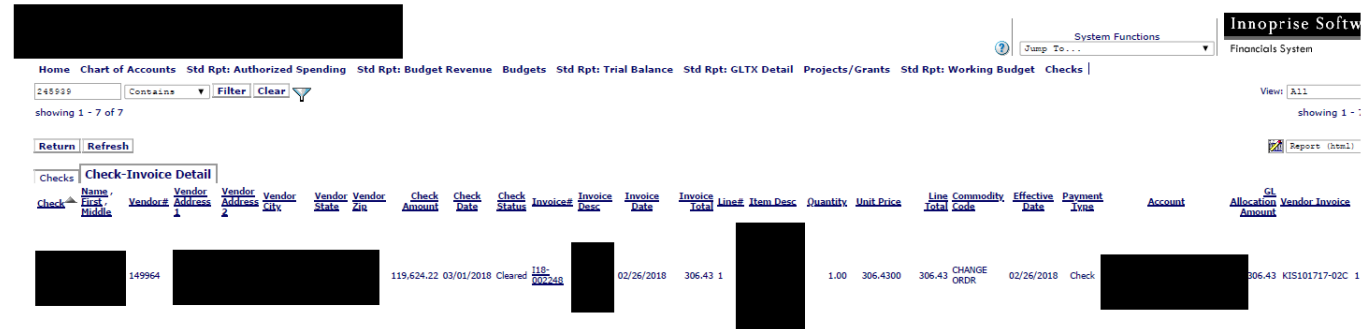
Back of Check

Vendor name



Cleared bank

System screenshots are **not** considered adequate proof of payment



Internal Time Reporting

- 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

Time Sheet

First Up Consultants

Organization name

Employee name & ID

Employee Name John Smith Employee ID 36
 Manager: Andrew Smith

Start Date 6/15/2022
 End Date 6/19/2022
 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
6/17/2022	8:00	11:00	12:00	18:00	8.00	Patrol Area
6/18/2022	8:00	11:00	12:00	18:00	8.00	Patrol Area
6/19/2022	8:00	11:00	12:00	18:00	8.00	Patrol Area
6/20/2022						
6/21/2022						

Description of the work performed

Date worked is within the period of performance

Total number of hours worked

Regular Hours	40.00
Overtime Hours	
Hourly rate	\$20.00
Total pay	\$800.00

Employee signature

Date

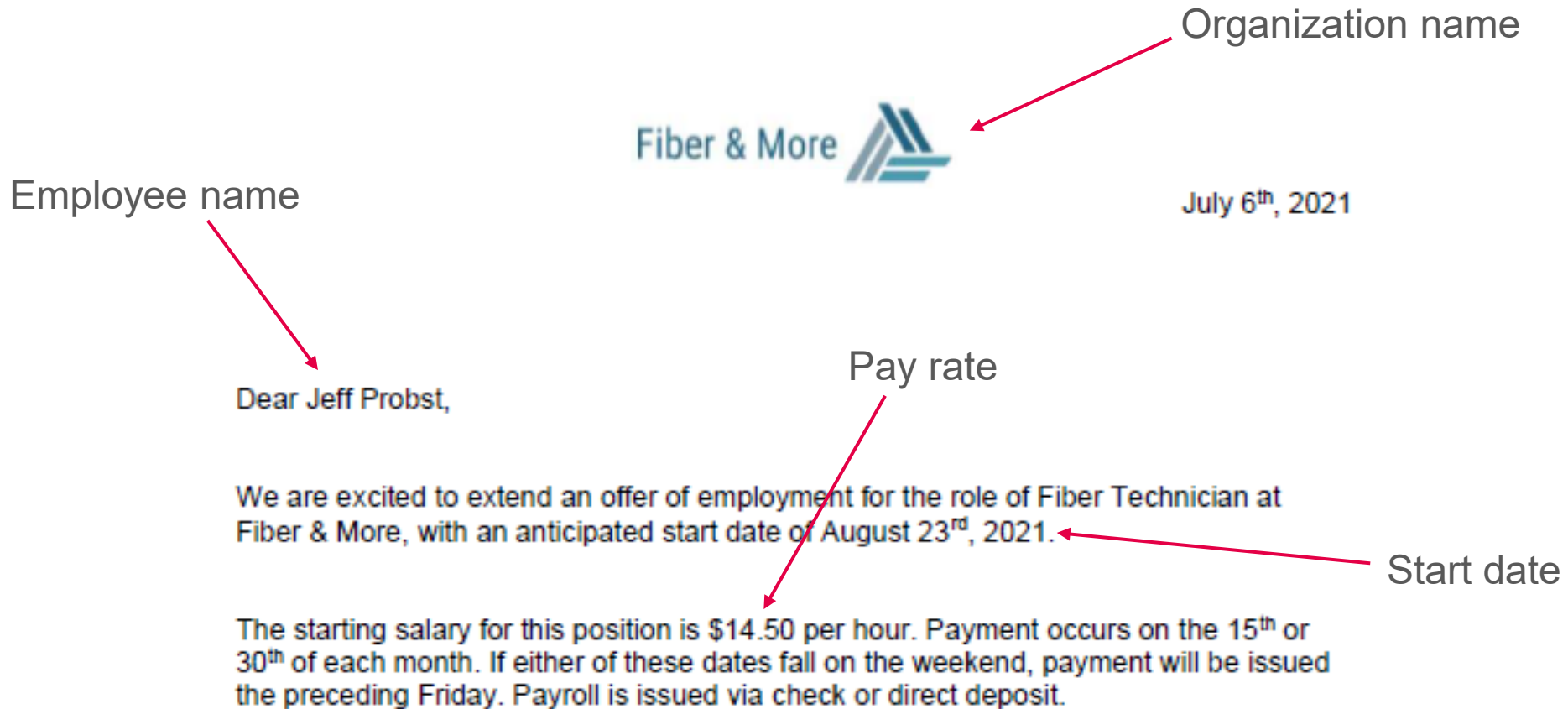
Manager signature

Date

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-by-case basis if no documentation of approved pay rates is available.

Proof of Pay Rate Example




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

Pay period range Pay date

Payroll Register Report
Fiber & More

Fiber & More 

Pay Period From 04/01/2023 to 04/14/2023 Pay Date: 04/28/2023 Payroll # 52 (Standard)

Earnings	Hours*	Rate	Current	YTD	Taxes	Current	YTD	Deductions	Current	YTD	ER Taxes**	Current	YTD
Emp# 28 John J. Hancock Sr													
DirDep Net Pay: 568.43													
PhilaForeman				2,773.98	FWT	59.45	2,071.30	Phila JobsRecover	12.80	336.40	ER SS	48.64	1,296.48
PhilaForShift				1,808.32	SS W/H	48.64	1,296.48	Phila MetroRegion	27.46	731.89	ER MC	11.38	303.21
PhilaCarp	8.00	46.70	373.60	10,320.70	MC W/H	11.38	303.21	Phila Per Capita Ta	0.80	21.03	FUTA	0.00	42.00
PhilaCarShift	8.00	51.37	410.96	5,342.48	PA State Tax	24.09	641.97	Phila Political Educ	3.92	104.55	PA SUTA	0.00	395.61
PhilaCarpOT				665.48	Philadelphia City S	27.12	722.85						
					PA SUI	0.47	12.55						
Employee Tot:	16.00		784.56	20,910.96		171.15	5,048.36		44.98	1,193.87		60.02	2,037.30
Grand Tot:	461.00		23,300.33	397,474.53		6,477.19	106,738.86		1,621.23	28,481.21		1,918.99	39,832.91
Payroll Summary Total Net Pay: 15,201.91													
Regular	40.00		2,398.80	35,982.00	FWT	3,117.43	50,798.46	NJ Dues Check-Off	0.00	1,010.01	ER SS	1,444.64	24,643.42
PhilaForeman	79.00		4,058.23	79,315.26	SS W/H	1,444.64	24,643.42	NJ JobRecoveryFu	0.00	504.99	ER MC	337.83	5,763.36
CountyForeman				4,208.64	MC W/H	337.83	5,763.36	NJ Vacation Deduct	0.00	1,262.52	FUTA	0.00	798.00
PhilaForShift	56.00		3,164.56	55,057.92	NJ State Tax	340.26	4,957.57	PA Child/Spousal S	297.38	4,587.45	NJ SUTA	136.52	3,076.85
CountyForShift				385.76	NJ SDI	8.29	186.78	Phila JobsRecovery	368.80	5,861.20	PA SUTA	0.00	5,551.28
PhilaForOT				2,003.56	NJ SUI	20.73	467.09	Phila MetroRegionC	815.52	13,027.81			
CountyForOT				591.84	NJ Family Leave In	3.90	87.93	Phila Per Capita Ta	23.05	366.32	NJ ER SDI	24.38	1,185.34
PhilaForDT				410.96	PA State Tax	478.66	8,550.19	Phila Political Educ	118.48	1,860.91			
PhilaCarp	228.00		10,199.28	125,071.94	Philadelphia City SD	718.14	11,116.97						
CountyCarp				4,323.72	PA SUI	9.31	167.09						
PhilaCarShift	58.00		2,979.46	47,178.32									
CountyCarShif				3,507.20									
PhilaCarpOT				5,253.76									
CountyCarOT				59.78									
PhilaCarpDT				373.60									
NJ Foreman				7,971.60									
NJ Carpent				17,278.67									
Bonus			500.00	7,500.00									
Payroll Totals :	461.00		23,300.33	397,474.53		6,477.19	106,738.86		1,621.23	28,481.21		1,943.37	41,018.25

Organization name

Amount paid for the period

Employee ID / name

* Hour totals represent total work hours and do not include any overtime or double-time premium hours.

** Individual checks include FICA and unemployment taxes only. For summary, other employer tax YTD's represent total employer tax as of pay date.

IowaGrants Correspondence

Subrecipients should use the Correspondence Portal within IowaGrants 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.

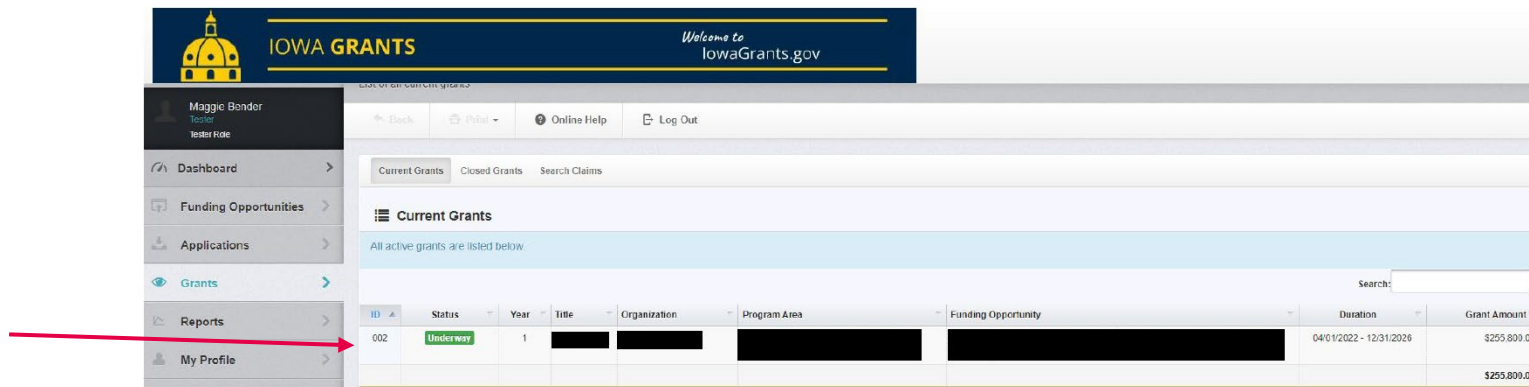
The screenshot shows the IowaGrants website interface. At the top, there is a dark blue header with the IowaGrants logo (a yellow dome) on the left, the text "IOWA GRANTS" in yellow, and "Welcome to IowaGrants.gov" on the right. Below the header, the main content area is light gray. On the left, under the heading "Login", there are three stacked boxes. The top box is titled "IowaGrants Users Click Here To Login" and contains a blue button with the text "Click Here to Access Single Sign On Tool". A red arrow points to this button. The middle box is titled "Interested in the current posted Opportunities?" and contains a blue button with the text "View Current Funding Opportunities". The bottom box is titled "DISABLED (IOWA USERS DO NOT USE)" and contains input fields for "User ID" and "Password", followed by a "SIGN IN" button. On the right side, there is an "Announcements" section with a yellow background for the heading: "*** NEW SYSTEM LOGIN PROCESS FOR ALL USERS ***". Below this, there is red text stating: "All IowaGrants Users MUST always utilize the Single Sign On Tool to sign into IowaGrants. (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." Below this text, there is a link: "Login instructions and a short video are available here, [http://dom.iowa.gov/iowa-grants-login](\"http://dom.iowa.gov/iowa-grants-login\")" and a note: "Contact your program manager should you have questions." At the bottom right of the page, there is small text: "Copyright © 2001-2022 Dulles Technology Partners Inc. Dulles Technology Partners Inc. WebGrants 7.3.1".

IowaGrants Correspondence Training *Continued*

2. Select “Grants”



3. Select applicable grant



IowaGrants Correspondence Training *Continued*

4. Select “Correspondence”

The screenshot shows the IowaGrants website interface. At the top, there is a dark blue header with the IowaGrants logo (a yellow dome) on the left, the text "IOWA GRANTS" in yellow, and "Welcome to iowaGrants.gov" on the right. Below the header is a navigation bar with "Back", "Print", "Online Help", and "Log Out" options. The main content area is divided into a left sidebar and a main panel. The sidebar contains a user profile for "Tester" and a list of menu items: "Dashboard", "Funding Opportunities", "Applications", "Grants", "Reports", and "My Profile". A red arrow points to the "Grants" menu item. The main panel displays details for a grant with ID "002 - [redacted]". The status is "Underway" (in a green box). Other details include Program Area, Funding Opportunity, Organization, Grantee Contact, Program Officer, and an Awarded Amount of \$255,800.00. Below this is a section titled "Grant Components" with a table listing various components and their last edited dates.

Component	Last Edited
General Information	Jan 17, 2023 2:12 PM - [redacted]
Claims	
Status Reports	
Correspondence	Dec 1, 2022 12:00 AM - [redacted]
Budget NOFA #007	Apr 7, 2022 12:00 AM - [redacted]
Contract Amendments	
Funding Opportunity	

IowaGrants Correspondence Training *Continued*

5. Select “Add Grantee Correspondence”

The screenshot displays the IowaGrants interface for a specific grant. At the top left, a folder icon is followed by the number '002' and a redacted area. Below this, a yellow background contains the following details:

- Status: **Underway**
- Program Area: [Redacted]
- Funding Opportunity: [Redacted]
- Organization: [Redacted]
- Grantee Contact: [Redacted]
- Program Officer: [Redacted]
- Awarded Amount: \$255,010.00

Below the details is a navigation bar with tabs: Grant List, Genera, Claims, Status, **Corres**, Budget, and Contra. Under the 'Corres' tab, the heading 'Inter-System Grantee Correspondence' is visible. To the right of this heading is a green button labeled '+ Add Grantee Correspondence', which is highlighted by a red arrow. Below the button is a search input field.

Flag	Sent/Received	From	To	Subject	Message	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5
	12/01/2022	[Redacted]	[Redacted]	Grant 002 - [Redacted]	Hello testing					

IowaGrants Correspondence Training *Continued*

6. Include Sarah Plowman and RSM in the “To” field

7. Add a subject

8. Draft your message

9. Attach files, if needed

10. Send correspondence

The screenshot shows the 'Inter-System Grantee Correspondence' form. At the top right is a 'Send Correspondence' button. The form includes a 'Flag' dropdown, a 'To:' field with a red arrow labeled '6', a 'CC:' field, a 'Subject:' field with a red arrow labeled '7', and a 'Message:' text area with a rich text editor toolbar and a red arrow labeled '8'. Below the message area are three 'Attachment' fields (Attachment 1, 2, and 3), each with a 'Select file' button and a red arrow labeled '9'. A red arrow labeled '10' points to the 'Send Correspondence' button. A note below the 'CC:' field states: 'CC addresses must be entered in a valid email format, i.e. name@domain.org. Use a semicolon (;) to separate multiple CC email addresses.'



QUESTIONS AND ANSWERS

THANK YOU FOR
YOUR TIME AND
ATTENTION

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