



N A S C S P

NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

FINANCIAL MANAGEMENT & MONITORING

NASCSP MID-WINTER TRAINING
CONFERENCE

SUBPART B: GENERAL PROVISIONS



- Purpose: 2 CFR Part 200 establishes uniform administrative requirements, cost principles, and audit requirements for all types of non-Federal entities
- Awarding agencies must not impose additional or inconsistent requirements, unless
 - Requirement based on Federal statute, regulation, or Executive Order,
 - OMB permits an exception in accordance, or
 - OMB approves information in the Federal award
- Supersedes
 - Circulars A-21, A-87, A-89, A-102, A-110, A-133
 - All other administrative requirements, program manuals & non-regulatory materials

SUBPART C: PRE-FEDERAL AWARD REQUIREMENTS AND CONTENTS OF FEDERAL AWARD



- **200.212**, Reporting of non-qualified entity
- **200.213**, Suspension and Debarment

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.324 Federal awarding agency or pass-through entity pre-review

- b) Non-federal entity must make available upon request the procurement documents if:
 - 1) Procurement procedures fail to comply with OMB standards
 - 2) Procurement exceeds the small purchase threshold and is to be awarded without competition;
 - 3) Procurement exceeds the small purchase threshold and specifies a brand name product;
 - 4) Procurement exceeds the small purchase threshold and is to be awarded to other than the lowest bidder under a sealed bid; or
 - 5) A contract modification changes the scope to exceed the small purchase threshold

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.324 Federal awarding agency or pass-through entity pre-review

- b) Non-federal entity is exempt from the pre-procurement review if it is determined that the procurement systems comply with the procurement standards
 - 1) The non-federal entity may request for a certification of their procurement system
 - 2) The non-federal entity may self-certify and have its system available for review.

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.328 Monitoring and reporting program performance

- a) Non-Federal entity must monitor its activities to assure compliance with Federal requirements and that performance goals are being achieved
- b) Performance reports should:
 - 1) Be submitted at an interval that best informs of outcomes and productivity. Usually these reports are due at least annually and not more than quarterly.
 - 2) Include comparison of actual accomplishments to objectives & if appropriate, reasons why goals were not met

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.328 Monitoring and reporting program performance (cont.)

- d) Non-Federal entity must inform the Federal awarding agency or pass-through entity as soon as the following types of conditions become known:
 1. Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the Federal award
 2. Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more or different beneficial results than originally planned

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



NASCS

200.328 Monitoring and reporting program performance (cont.)

- e) The Federal awarding agency may make site visits as warranted by program needs

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



NASCS

200.329 NEW Reporting on real property

The Federal awarding agency or pass-through entity must require a non-Federal entity to submit reports at least annually on the status of real property in which the Federal government retains an interest, unless the Federal interest in the real property extends 15 years or longer.

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.330 Subrecipient and contractor determinations

A pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor.

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.33 I Requirements for pass-through entities

- a) List of required information for every subaward, including:
 1. Federal Award Identification (13 items required to be disclosed)
 2. All requirements, regulations and terms and conditions of the award
 3. Any additional requirements imposed by the pass-thru entity
 4. NEW An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient, or a de minimis indirect cost rate of 10% of MTDC
 5. Must allow access to records
 6. Terms and conditions of closeout

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.331 Requirements for pass-through entities (cont.)

- b) Evaluate subrecipient's risk of noncompliance:
 - 1. The subrecipient's prior experience with the same or similar subawards;
 - 2. The results of previous audits including whether or not the subrecipient receives a Single Audit and the extent to which the same or similar subaward has been audited as a major program;
 - 3. Whether the subrecipient has new personnel or new or substantially changed systems; and
 - 4. The extent and results of Federal awarding agency monitoring

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.33 I Requirements for pass-through entities (cont.)

- c) Consider imposing specific subaward conditions upon a subrecipient, if appropriate
 - **200.207**, Special award conditions
 - a) Awarding agency may require additional conditions based on risk assessment:
 - 1) Require payments to be reimbursements rather than advances;
 - 2) Withhold authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance.
 - 3) Require additional, more detailed financial reports;
 - 4) Require additional project monitoring
 - 5) Require the non-Federal entity to obtain technical or management assistance;
or
 - 6) Establish additional prior approval requirements

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.33 I Requirements for pass-through entities (cont.)

- d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes
 - 1) Reviewing financial and programmatic reports required by the pass-through entity
 - 2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient
 - 3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient
- e) The following monitoring actions may be useful to ensure proper accountability and compliance:
 - 1) Providing subrecipients with training and technical assistance on program-related matters: and
 - 2) Performing on-site reviews of the subrecipient's program operations.

SUBPART D: POST FEDERAL AWARD REQUIREMENTS AND STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT



200.33 I Requirements for pass-through entities (cont.)

- f) Verify that every subrecipient is audited as required when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the Single Audit threshold
- g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records
- h) Consider taking enforcement action against noncompliant subrecipients

SUBPART E: COST PRINCIPLES



200.414 & 200.331 Requirements for pass-through entities – required information

- 4) An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient, or a de minimis indirect cost rate (10% based on MTDC)

SUBPART E: COST PRINCIPLES



200.420 – 200.475 General Provisions for Selected items of Cost

- ❑ Some of the selected items of cost require prior approval of the Federal awarding agency or the pass-through entity.

SUMMARY



- The new Uniformed Guidance clearly encourage the use of audits and assessments to focus monitoring to areas of greatest need
- Pass-through entities are not required to monitor all subrecipients the same
- Have a strong risk assessment tool
- Target monitoring and training based on risk assessment



NASCSP

Michelle Picklesimer

South Central Community Action Partnership

michelle@sccap-id.org

208-733-9351