



HIGH ROAD

High Road Training Partnership: Resilient Workforce Program Grant Administration Guide

FY 21 – 24

State Funded Grant Program

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Purpose of the Grant Administration Guide

Funding under the High Road Training Partnership (H RTP): Resilient Workforce Program (RWP) is provided through the California Workforce Development Board (CWDB). This guide was created as a comprehensive resource for Fiscal Agents/Awardees and applies to all entities receiving funds under the H RTP: RWP grant program. Please use and reference as needed, and share with partners, front-line workers, program administrators, data entry professionals, contractors, etc., as appropriate. This document may be updated throughout the grant term.

Updated versions of this document will be posted on the [H RTP Grantee Portal](#).

The Fiscal Agent/Awardee is responsible for running and operating a compliant grant program. The purpose of the Grant Administration Guide is to assist with this process.

Grant Administration Guide

General Grant Information

Grantee Portal

The Grantee Portal, located within the CWDB website, provides various guides, directives, and resources about the grant program to inform current and prospective grantees.

Website: <https://cwdb.ca.gov/hrtp-grantee-portal/>

Password: HighRoad

CWDB Points of Contact

Grant Administration & Project Management: H RTP@cwdb.ca.gov

The CWDB Program Implementation and Regional Support Branch (Program Branch) utilizes a dedicated inbox per initiative to handle all grant administration and project management communications. Inquiries will be responded to within 48 hours, Monday – Friday.

When emailing the initiative inbox, always include the *grant program/cohort name in the subject line, the name of the Fiscal Agent/Awardee, and the topic of inquiry*. Areas of assistance include, but are not limited to:

- Project development and implementation guidance
- Budget and fiscal, including allowable use of funding and payment status
- Course corrections, adjustments, and modifications
- Cal-E-Grants technical assistance
- Grant program reporting

Participant Data Collection & Reporting: ResearchUnit@cwdb.ca.gov

The CWDB Policy, Research, and Legislation (PRL) Branch's Research Unit provides project and program evaluation and support related to participant data reporting requirements and procedures, including technical assistance related to data collection systems (CalJOBS, Cal-E-Grants), access to the Secure Automated File Exchange (SAFE) website, and assistance with participant eligibilities and placement inquiries. The PRL Branch inbox is designed to receive and respond to any questions or technical assistance relating to participant data collection and reporting. Inquiries will be responded to within 24 hours, Monday – Friday.

Role of the California Workforce Development Board

Program Implementation and Regional Support Branch

The CWDB Program Implementation and Regional Support Branch (Program Branch) manages grant administration and project management. The Program Branch will be the main point of contact throughout the grant term. Each project will be assigned a Program Analyst who can be contacted through the initiative inbox.

Equity, Climate, and Jobs Field Branch

Field Specialists have subject matter expertise in a variety of focus areas and industries throughout the state. They play a pivotal role in building connections and collaborations with

key regional leaders to sustain High Road initiatives in the long term.

Policy, Research, and Legislation Branch

In addition to project and program evaluation, Policy, Research, and Legislation staff provide clarification and support related to participant data reporting requirements and procedures, including but not limited to technical assistance related to CalJOBS data entry, the State Grant Data System (SGDS), the Secure Automated File Exchange (SAFE) website, account set up, password reset issues, and assistance with participant eligibilities and placement inquiries.

Role of the Employment Development Department (EDD)

Although the EDD does not manage this grant program, they are involved in the CWDB state-funded grant programs by providing the Standard Agreement and fiscal support. The CWDB Program Branch works closely with EDD during the execution and processing of invoices for the Standard Agreement.

The EDD will be involved in the following areas of the grant program:

- Setup, execution, and amending of Standard Agreements
 - The EDD Contract Service Group oversees the grant agreement process and may contact the Fiscal Agent/Awardee with required paperwork or share executed documents.
- Payment
 - The EDD Financial Reporting and General Ledger Group and Fiscal Programs Division oversees the reimbursement process. The warrant will be mailed to the Fiscal Agent/Awardee no later than 45 calendar days after the invoice is processed by the Financial Reporting and General Ledger Group and forwarded to the Fiscal Programs Division.

Role of the Fiscal Agent/Awardee

Fiscal Agent/Awardee Requirements and Responsibilities

The term “Fiscal Agent/Awardee” refers to the awarded agency that enters into an agreement with the State of California. As the first point of contact for the CWDB, the Fiscal Agent/Awardee is expected to:

- Always have knowledge of the project’s program and fiscal status. This includes but is not limited to knowledge of program and partnership activities, the status of individual project teams, participant activities and data, project obstacles, and project expenditure status.
- Have knowledge, experience, and practice in managing State Standard Agreements and adhering to fiscal rules and requirements.
- Assume responsibility for tracking and entering participant data in a timely and accurate manner.
- Maintain active communication with key players and the CWDB, as well as communicate any obstacles impeding the progression and success of the project to the CWDB.
- Organize and coordinate regional activities.
- Collect and report all data, deliverables, and partnership outcomes to the CWDB.

Specific Points of Contact

All Fiscal Agents/Awardees must designate certain staff as Specific Points of Contact (SPOC), who will keep the CWDB updated on parts of the project. A SPOC form will identify individuals within the project who will be responsible for the following areas:

- Point of contact for the grant, including project status and activities. This individual will be the main point of contact throughout the grant term.
- Point of contact for reporting.
- Point of contact for fiscal administration.
- Point of contact for participant data, Cal-E-Grants data entry, and case management.
- Individuals will receive networking and information-sharing opportunities and events.

To adjust or edit the SPOC form during the grant term, Fiscal Agents/Awardees will notify the initiative inbox. The Fiscal Agent/Awardee will be responsible for keeping the SPOC form current and notifying the CWDB of changes in staff and points of contact.

Project Management

Cal-E-Grants: Project Management and Staff Accounts

[Cal-E-Grants](#), the system used to submit CWDB applications, will also be used for project management purposes. Accordingly, all staff directly reporting on program and fiscal outcomes are required to have a Cal-E-Grants account by the start of the grant period.

The existing Cal-E-Grants Administrator for each organization can create individual accounts for all staff. All reports should be made under the Administrator account to streamline required reporting. *Individual accounts not linked to the Administrator account should be avoided.* If staff accidentally creates an account that is not linked to the Administrator account, CWDB staff must be notified immediately.

Creating Cal-E-Grants Staff Accounts

After the Administrator has logged into Cal-E-Grants, they will take the following steps to create a staff account:

1. Go to *Manage Users* at the top of the Cal-E-Grants webpage.
2. Select the *Add a New User* button (located far right above the yellow bar). A *Create New User* pop-up screen will appear.
3. Enter contact information for the new user (Name, Email, Phone, etc.) and permission type.
 - a. The permission type drop-down will provide two options: *Administrator* or *User*. Select the *Administrator* option for project staff, as this authorizes access to grant management functions in the system.
4. Select *Create* once all information is entered.
5. Receive an email notification with a hyperlink to create a password and formally create an account using their own credentials.

If a Cal-E-Grants password needs to be reset, contact the initiative inbox for assistance.

Project Progress and Modifications

Communicating Project Progress and Changes

The CWDB must be immediately notified and updated via email when there are adjustments or deviations from the proposed work and before changes occur. Changes and adjustments should also be documented in the formal reporting process.

Not all project adjustments will require formal amendment. When applicable, the CWDB Program Team will provide guidance and instruction on the next steps.

Project Modifications

The Standard Agreement acts as a binding contract for the CWDB and the Fiscal Agent/Awardee. Modifications to this agreement can result in an amendment and revision of applicable exhibits.

The following change types will require a project modification:

- Budget modification – moving funds from one line item to another.
- Partnership changes – budget adjustments to contractors (partners).
- Other – All other requests for approval of changes that do not fall under the first two categories.

The Fiscal Agent/Awardee will be asked to provide reason(s) and a thorough justification for all changes requested. Insufficient justification will result in the rejection and/or return of a Modification Request.

Modification Process Summary

To initiate a modification, the Awardee/Subrecipient must complete and submit a Modification Request in the Cal-E-Grants system. Modification requests are not official until the request is completed, submitted, and approved by the CWDB. Insufficient justification will result in a request being rejected and returned for additional details. Once additional details are added, it can be re-submitted.

The modification process will include the following steps:

1. Complete and submit a Modification Request in the Cal-E-Grants system.
 - a. If assistance is needed prior to starting the request, contact the Program Branch through the initiative inbox.
2. Once received, the CWDB will review the Modification Request and respond with the next steps, including guidance on specific exhibit revisions being requested.
3. Revisions will be completed in the Cal-E-Grants system. Applicable exhibits (tabs) will be opened for edits, reflecting the changes outlined in the Modification Request.
4. The CWDB will review and determine whether the Modification Request is approved. If approved, the CWDB will provide formal written approval and any pertinent information or next steps. Prior written authorization may be needed depending on the nature of

the request. If required, the CWDB will notify and request approval for additional information from the Reference Allowable Costs and Prior Written Approval guidance under the Fiscal Monitoring and Documentation section.

Modification Request Submittal

The Fiscal Agent/Awardee can complete and submit a Modification Request within the grant term in the [Cal-E-Grants](#) system.

Take the following steps to complete and submit a Modification Request:

1. Log in to the [Cal-E-Grants](#) system.
2. Select Grants.
3. Click on *Grant ID* and select the appropriate grant program.
4. Select *New Modification Request*.
5. Click the *Modification Requests* tab (located between the *Budget Allocation* and *Invoices* tabs) to see if a Modification Request has been created.
6. Enter a name for the request.
7. Select the *Classification/Type* of request.
8. Provide a summary of the request and include the following:
 - a. Line item(s) funds are being moved from.
 - b. Total amount being moved.
 - c. Line items to which funds will be moved.
 - d. Total(s) for each adjusted line item.

Example:

Requesting the move of \$5,000 from Staff Salaries into Staff Travel (\$750) and Supportive Services (\$4,250). The adjusted line-item allocations would be as follows:

- *Staff Salaries: \$30,000.00.*
- *Staff Travel: \$8,750.00.*
- *Supportive Services: \$24,250.00.*

9. Provide a justification for your request.
 - a. Explain why you are reducing funds from one area and increasing them in another. Provide sufficient detail to illustrate why changes are reasonable and necessary to move the project forward.
10. Select *Save* once all information has been entered.
11. Read and accept the *Acknowledgment* notice that will appear, then select *Proceed*.
12. Click *Submit* for Review.

Take the following steps to edit and submit revised exhibits:

1. The CWDB will send an email notification when the modification request is approved and applicable exhibits (tabs) are opened for editing.
2. The Administrator and/or designated staff will edit the applicable exhibits (tabs).
3. When edits are complete, select *Submit for Approval*.

It is highly recommended that staff save their work and contact Program Branch staff to review

edits before submitting for approval. This will ensure all requested edits to the applicable exhibit/application tabs are made. Once *Submit for Approval* has been selected, the exhibit/application tabs will be locked and can no longer be edited.

Modification Types

The CWDB has two types of modifications: Informal Modification and Formal Modification. Both require the same review, vetting, and approval process outlined in the Standard Agreement Modification Process section. The difference between the two is the method of execution.

Informal Modification – *Standard modification type used by State Funded grants.* The CWDB has the authority to approve exhibit revision internally and without formally amending the contract/standard agreement. Modifications made through an Informal Modification are legally binding and will replace the documents within the standard agreement. Fiscal Agents/Awardees must keep track of Informal Modification requests and updated exhibits since the original Standard Agreement will have different documents and will not be current. The CWDB will provide the Fiscal Agent/Awardee with the formal written approval of the modification for their records.

Formal Modification – *Used for grant term extension or to increase or decrease award grant amount.* A Formal Modification will amend the formal standard agreement and may take 4 to 5 months to execute. The Fiscal Agent/Awardee will need an executed contract to move forward with changes made via Formal Modification.

Modification Request Cutoff/Timeline

Prior to the end of the grant term, Fiscal Agents/Awardees should evaluate their projects to determine if a modification requires submission for review and approval. To ensure seamless and efficient processing, all modification requests must be submitted **60 days** before the grant term's end date.

Modification requests received outside the listed timeframe may not be considered for approval.

Project Reporting

Quarterly Check-Ins

Project check-ins will occur quarterly for the first year of the grant term. These recurring virtual meeting check-ins will be scheduled between the Fiscal Agent/Awardees and the CWDB Program Analyst at the start of the grant term. At the end of the first year, the CWDB will determine the frequency of formal check-ins for each grantee's remainder of the grant term.

The quarterly check-ins provide ample opportunities for Fiscal Agents/Awardees to raise program-related questions and/or concerns and obtain timely technical assistance. Program Analysts and CWDB staff can also learn more about the project and partnerships, including immediate challenges, successes, and needs. Information gathered will further assist the CWDB

in informing future opportunities and evaluations.

The CWDB will communicate with the Fiscal Agent/Awardee to confirm the agenda, check-in dates, and times and ensure ample time to prepare. The CWDB encourages crucial partners and key program staff to attend the check-ins to the extent feasible, but participation will be up to the Fiscal Agent/Awardee's discretion.

Progress Reports

Progress Reports are submitted via Cal-E-Grants. Progress Reports are submitted after each semi-annual reporting cycle and cover the activities that occurred within that period. The purpose of the Progress Report is to capture the following relevant information:

- Project status and outcomes to date.
- Project progression, work plan adjustments, and areas of opportunity.
- Successes and challenges experienced.
- Innovations, best practices, and lessons learned.
- Qualitative and quantitative data – including participant outcomes (if applicable).
- Technical assistance needs.

The Fiscal Agent/Awardee must provide complete, comprehensive responses demonstrating project implementation activities, progress, successes, and challenges. Failure to provide correct or responsive answers may impact the performance and evaluation of the Fiscal Agent/Awardee and the project. Failure to adhere to proper reporting requirements may affect performance evaluation and future funding opportunities.

Semi-Annual Reporting Schedule

- January 1 through June 30 – Report due July 20
- July 1 through December 31 – Report due January 20
- Grant programs that start within a reporting period will still be held to that reporting schedule. For example, a grant term start date of April 1 will report April 1 – June 30 with a report due date of July 20th.

Progress Report Submittal

Fiscal Agents/Awardees will complete and submit all progress reports in the [Cal-E-Grants](#) system.

Take the following steps to complete and submit a progress report:

1. Log in to Cal-E-Grants and enter your Username and Password.
 - a. If staff needs to access the Progress Report in the Cal-E-Grants system, the organization's Cal-E-Grants Administrator should add the staff member to the Cal-E-Grants Administrator account rather than create their own Cal-E-Grants account.
 - b. To add a new user, the Administrator must log into their account, then:
 - i. Go to *Manage Users* at the top of the Cal-E-Grants webpage.

- ii. Select the *Add a New User* button (located far right above the yellow bar).
 - iii. A *Create a New User* pop-up screen will appear.
 - iv. Enter contact information for the new user (Name, Email, Phone, etc.) and permission type.
 - The permission type drop-down will provide two options: Administrator or User. The Administrator option authorizes the new user to have the same access rights to the grant as the original Administrator.
 - v. Once complete, select *Create*.
 - vi. New user(s) will receive an email notification with a hyperlink to create a password and formally create an account using their own credentials.
- 2. Locate and select *Grants*.
- 3. Locate *Recently Viewed*, select the drop-down button, and select *All*.
- 4. Locate and select the program's *Grant ID* button for the appropriate grant program.
- 5. Select *New Report*.
- 6. The title field box may be left blank as it is optional to complete the progress report.
- 7. Select the *Narrative* tab and follow the prompts to complete the progress report.
- 8. After completing the *Narrative* tab, select *Save*.
- 9. If supporting documentation needs to be included with the progress report, upload it in the *Documents* tab.
 - a. Select *New*.
 - b. Enter the document's name, select the document's format (i.e., Word, Excel, PDF), and save.
 - c. Under the Document tab, locate the document entry you created and select *Upload Files*.
 - d. Locate the document on your computer to upload.
 - e. Choose *Done* when the upload is complete.
- 10. Review the *Narrative* tab and verify that all questions are answered with detailed responses. Select *Submit*.

Close-Out Report

The Fiscal Agent/Awardee will complete and submit the Close-Out report in the Cal-E-Grants system. If multiple partner organizations are involved, the Fiscal Agent/Awardee may consult with partners and project teams to complete and submit the Close-Out Report. The Close-Out report will highlight the results of the regional approach, strategies, accomplishments, challenges, and more. Further guidance on close-out reporting will be provided toward the end of the grant.

The Close-Out report will evaluate the entire grant term and must be submitted 30 days after the grant term end date.

Grant Close-Out Preparation

The CWDB recommends starting close-out activities and preparation 60 days prior to the end of

the grant term. On the fiscal side, this includes activities such as spending down funds, paying off contractors/partner organizations for goods and services delivered, and informing the CWDB of unspent funds. On the program side, this involves ensuring participant data and activities are up to date, compiling qualitative and quantitative data, assessing outcomes achieved by the project, documenting lessons learned and best practices, and more.

Grant funds cannot be spent after the grant term ends, nor can pre-payment be made for activities occurring outside of the grant term. Any unspent grant funds will revert to the State of California.

Periodic Review and Information Requests

The CWDB may conduct periodic reviews and request information at any time (and as needed) throughout the grant term. If the Fiscal Agent/Awardee is not performing in accordance with program requirements, the Fiscal Agent/Awardee will be subject to the remedies for non-performance. These may include but are not limited to being placed on cash hold until issues are resolved or de-obligation of funding.

Monthly Fiscal Expenditure Reporting

The Fiscal Agent/Awardee will complete and submit all monthly invoices in the Cal-E-Grants system. Invoices are due before or by the 20th of the month following the invoice period. Invoices must be submitted even when there is a \$0 balance for the month.

Fiscal (Invoice) Report Submission Instructions

Invoice Submittal

1. Log in to Cal-E-Grant and enter your **Username** and **Password**.
2. Select *Grant*.
3. Select the down button next to *Recently Viewed*, then choose *All*.
4. Locate and select the program's Grant ID.
5. Select *New Invoice*.
 - a. Select the *Invoices* tab, located between the *Modification Requests* and *Progress Reports* tabs, to check if an invoice has been created for the quarter.
6. Select the appropriate month that you are invoicing.

Example: If the grant term begins in May 2023, select *May 2023*.
7. Review the disclaimer and complete the *Authorizing Signature Name* before proceeding.
8. Complete the following invoice information:
 - ***Grant Fund Expenditure:*** Identify amounts for each line item for which reimbursement is requested. These should align with existing budget allocations.
 - ***Leveraged Fund Expenditure:*** If the project utilizes leverage/match funding, it will need to be accounted for monthly per the spending plan. For more details, refer to Leverage/Match Funds under this guide's Fiscal Monitoring and Documentation sections.
9. Select *Save* after completing the invoice.
10. Select the *Documents* tab if supporting documentation will be included, and follow the steps below:

- a. Select *New*.
 - b. Enter the document's name and select a format for the document (i.e., Word, Excel, PDF), then choose *Save*.
 - c. Locate the document entry created on the Document tab and select *Upload Files*.
 - d. Locate the document on the computer and upload it.
 - e. Select *Done* when the upload is complete.
11. Review to ensure all amounts are correct, then *Submit*.

Payment

The warrant will be mailed to the Fiscal Agent/Awardee by the 45th calendar day after the invoice is processed by the Financial Reporting and General Ledger Group and forwarded to the Fiscal Programs Division.

Holidays, fiscal year-end, or unforeseen circumstances such as natural disasters, epidemics, etc., may affect this timeline.

The warrant will be mailed to the address listed on STD 204 and/or STD 205. Email the initiative inbox if the warrant is not received 45 days from the above date. Refer to the California Prompt Payment Act for additional information on payment lead times.

Fiscal Monitoring and Documentation

This section is intended to help Fiscal Agents/Awardees keep appropriate documentation on file in the event of monitoring/auditing. The CWDB will amend this section as new issues are brought to the CWDB's attention.

If Fiscal Agents/Awardees have specific questions or require assistance with monitoring and/or documentation, they should send an email through the initiative inbox.

Leveraged/Match Funds

This grant program does not have a match requirement, and leveraged funds are optional. This requirement was outlined in the solicitation and was approved as part of the application/award. If leveraged funds are identified in the executed contract, the Fiscal Agent/Awardee is held to such contributions and is required to track and report in Cal-E-Grants.

The Fiscal Agent/Awardee is required to track leveraged funds separately from grant funds. The Fiscal Agent/Awardee must provide all supporting documentation to show how leveraged funds were spent within the grant term if monitored and reviewed.

The CWDB defers to the federal leveraged/match funds guideline as outlined in the [Office of Management and Budget Guidance, Part 200, 2 CFR](#).

Allowable Costs and Prior Written Approval

Generally, costs are allowable when reasonable and necessary to fulfill project outcomes. In

certain circumstances and depending on the nature of a proposed purchase, the CWDB will request corroborating information in the form of Prior Approval documentation for evaluation purposes. *Formal notice of approval must be obtained from the CWDB before purchases can be made.*

Prior Approval documentation may be requested for new expenses not included in the original budget. The CWDB will inform the Fiscal Agent/Awardee when supplemental documentation is necessary.

Types of Prior Written Approval

CWDB Purchase Justification Approval

If the purchase (expense) is over \$2,500, the Fiscal Agent/Awardee must complete and submit the CWDB *Purchase Justification Approval* form. This pertains to individual unit purchases over \$2,500 and purchase orders. The Fiscal Agent/Awardee must also obtain three competitive quotes for the purchase over \$2,500 to justify that the expense cost is reasonable.

Example: Fiscal Agent/Awardee plans to purchase 10 laptops at \$500 each, for a total of \$5,000, which is over the threshold of \$2,500. The Fiscal Agent/Awardee must complete and submit the CWDB Purchase Justification Approval form and obtain three competitive quotes for the laptop purchase.

The Fiscal Agent/Awardee does not have to submit the quotes to the CWDB but must keep the quotes on file for monitoring purposes. If the purchase is a *sole source purchase* (only one vendor is capable of providing an item or service, so it is not possible to obtain competitive bids), notify the CWDB for further guidance on sole source requirements and documentation.

CWDB Use of Funding Approval

If the CWDB determines additional information is needed to corroborate how a purchase is related to the scope of work, deliverables, outcomes, and/or project activities, the Fiscal Agent/Awardee will be required to complete the *Use of Funding Approval* form. The Fiscal Agent/Awardee must provide proper justification for the expense. This includes details addressing how the proposed cost supports the original project outcomes. The CWDB will initiate this document and process it if required.

CWDB Use of Funding for Child Care Approval

If the Fiscal Agent/Awardee will provide child care as a Supportive Service, the CWDB *Use of Funding for Child Care Approval* form must be submitted for consideration.

The Fiscal Agent/Awardee must adhere to the following stipulations when completing the form:

- Child care costs must not exceed \$1,400 per child per month.
- Maintain three quotes for a licensed child care provider for three years.
- Obtain receipts from the participants for the child care costs. The receipts must be kept on file for three years upon completion of the grant term.

Approved *Prior Written Approval* may be revoked or rescinded at any time during the grant term if the CWDB determines the Fiscal Agent/Awardee is not in compliance with program requirements and state and federal guidelines.

Proof of Payment for Contracted Funds

While the CWDB does not request proof of payment with the invoice (e.g., receipts), the Fiscal Agent/Awardee and their partners/contractors receiving grant funds must maintain records for all expenses for monitoring/auditing purposes. All costs must be allowable and reasonable as outlined in the Funding Solicitation and/or Request for Application and as approved in the budget exhibits of the Standard Agreement.

Administrative & Additional Requirements

Monitor and Audit

After grant approval, Fiscal Agents/Awardees may be monitored and/or audited by the state in accordance with existing policies, procedures, and requirements governing the funding source and grant program. The purpose is to identify areas of strength and non-compliance. If selected, the Fiscal Agent/Awardee is expected to:

- Be responsive to all compliance monitors' Fiscal and Program Management requests.
- Provide reasonable and timely access to records and staff.
- Facilitate access to subcontractors and communicate with compliance monitors promptly and accurately.
- If performance is insufficient or the project is not performing and making progress toward deliverables, the state will consider placing the agency on cash hold and possibly de-obligating funds.
- Conduct regular oversight and monitoring of all Fiscal Agents/Awardees and their contractors.
 - This requirement will ensure that expenditures meet the cost category and limitation requirements of CWDB and that all Fiscal Agents/Awardees are compliant with other applicable laws and regulations and provide technical assistance as needed.
- Ensure that all awarded funds are compliant with State regulations.

Subrecipient and Contractor Distinctions

The Fiscal Agent/Awardee must determine the relationship with partners and entities on a case-by-case basis prior to entering into a contractual agreement. When deciding whether a contractor or Subrecipient relationship exists, the substance of the relationship is more important than the form of the agreement (i.e., grant, contract, subgrant, or subcontract). All characteristics related to the type of provider and agreement should be analyzed, and no single factor should be considered in isolation. Not all characteristics will be present in every relationship; however, in rare situations, an entity can be considered a recipient, a subrecipient, and a contractor, depending on the substance of each agreement.

Subrecipients are responsible for meeting all program compliance requirements. Contractors

are required to follow procurement selection rules but are exempt from program-related requirements. Contractors may receive payments for goods or services that originate from an award, but those payments are not considered a federal award.

[Subrecipient and Contractor Distinctions](#) (WSD 18-06) provides complete guidance on the distinction between subrecipients and contractors and the roles and responsibilities of all parties to an agreement.

Fiscal Agents/Awardees are held to the distinctions outlined in the Supplemental Budget and entered into their Standard Agreement. The areas below summarize relevant sections of this directive.

Subrecipient

Like the Fiscal Agent/Awardee, a Subrecipient carries out a portion of the award and is held to programmatic requirements. The following descriptions are indicative of a nonfederal entity in the role of a Subrecipient:

- Meet all participant and data requirements if administering participant services and activities, including participant eligibility, data entry, and case management.
- Performance is measured against the objectives of the grant program.
- Maintains programmatic control or independent discretion over work.
- Responsible for adherence to program requirements as outlined in the Funding Solicitation and/or Request for Application, Grant Administration, and Data Guide.
- Uses funds to carry out a program for a specified public purpose instead of providing goods or services for a program or pass-through entity.
- Directly supports the goals of the grant.

The Fiscal Agent/Awardee is responsible for Subrecipient(s) ability and performance and is required to provide oversight throughout the grant period to ensure grant program requirements are being met in all required areas pursuant to the Subrecipient role. If monitored, the Fiscal Agent/Awardee is responsible for providing proof that oversight was provided and rules were followed. If grant program rules are not followed, or the Subrecipient engages in disallowed activities, it may impact the Fiscal Agent/Awardee's performance, future funding opportunities, and/or the continuation or termination of the contract. Disciplinary action or disallowed costs will be up to the Fiscal Agent/Awardee to address with the CWDB as the State will not engage with Subrecipients.

Contractor

A contractor is a vendor, dealer, distributor, merchant, or other seller providing goods or services required to conduct a federal program. The following descriptions are indicative of a contractor in a procurement relationship with the non-federal entity disbursing federal funds:

- Provides goods and services to various purchasers within normal business operations.
- Operates in a competitive environment.
- Provides goods or services that are ancillary to the operation of the grant program.

- Not subject to federal compliance requirements of the program resulting from the agreement.
- Does not participate in program design.
- Holds little or no independent discretion over program work or direction.
- Undelivered work will result in non-payment.
- Not required to support the goals of the grant directly.

Record Retention

Fiscal Agents/Awardees are required to maintain the project and fiscal records in a manner that will allow state and local reviewers to evaluate the project's effectiveness and proper use of funds. The record retention system must include both original and summary (e.g., computer-generated) data sources. Fiscal Agents/Awardees will retain all records pertinent to this contract for three (3) calendar years from the date of final payment on this contract. Specific documentation and records to be used for this purpose are within the Fiscal Agent/Awardee's discretion to determine and produce if requested.

The CWDB relies on federal standards regarding [Record Retention and Access](#).

Communication & Branding

Branding & Communications Guidelines

Fiscal Agents/Awardees can request initiative/grant branding and communication guidelines through the initiative inbox. This document provides guidance regarding the implementation of the funding guidelines requirements. It is a reference for Fiscal Agents/Awardees and contractors implementing projects and programs around the state to ensure branding and messaging are consistent and in alignment with the CWDB and the funding source. The document includes guidance on the following:

- Media releases and events, including key messaging in all outreach and public-facing materials.
- Share success stories and photos with the CWDB.
- CWDB and grant program logo usage and expectations.