



HIGH ROAD

High Road Training Partnership:
Grant Administration Guide
State Funded Grant Program

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Purpose of the Grant Administration Guide

This guide was created as a comprehensive resource for Fiscal Agents/Grantees and applies to all entities receiving state funds. 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.

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

Grant Agreement

Fiscal Agent/Grantee has entered into a Grant Agreement with the California Workforce Development Board (CWDB), setting forth the complete terms of receipt, administration, and implementation of the Fiscal Agent/Grantee's grant and funded program. The CWDB has provided this Grant Administration Guide in order to assist the Fiscal Agent/Grantee in working with CWDB, including invoicing and reporting systems. However, the Fiscal Agent/Grantee is responsible for running and operating a compliant grant program. Fiscal Agent/Grantee's staff should review it in its entirety to ensure understanding of the complete Grant terms. In case of conflict between the terms of the Grant Agreement and this Grant Administration Guide, terms of the Grant Agreement shall govern.

General Grant Information

Grantee Guidance

The CWDB has a webpage designated for each grant program. For specific guidance, visit [Grantee Guidance](#), scroll to the bottom to locate the Program Specific Guidance section, and select the program.

CWDB Points of Contact

The CWDB Program Implementation and Regional Support (PIRS or 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 to Friday.

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

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

Participant Data Collection & Reporting

All participant data entries for this grant program are to be entered and captured on the Cal-E-Grants website. The *Participant Data Guidance* for CEG and related resources can be found on the Cal-E-Grants Guide on the [Grantee Guidance](#) website. The Research and Evaluation inbox is designed to receive and respond to any questions or technical assistance relating to participant data collection and reporting. All participant data inquiries should be sent to ResearchUnit@cwdb.ca.gov, with a response time of within 48 hours, Monday to Friday.

Role of the California Workforce Development Board Program Implementation and Regional Support Branch

The Program Implementation and Regional Support (PIRS or 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 to a Program Analyst who can be contacted through the initiative inbox.

Policy, Research, and Legislation Branch

In addition to project and program evaluation, the Research and Evaluation staff provide

clarification and support related to participant data reporting requirements and procedures, including but not limited to technical assistance related to data entry in CalJOBS and Cal-E-Grants, account setup, password reset issues, and assistance with participant eligibility and placement inquiries.

Workforce Policy and External Affairs Branch

The regional and industry engagement specialists under the Workforce Policy and External Affairs Branch 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 CWDB and administration initiatives in the long term.

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/Grantee

Fiscal Agent/Grantee Requirements and Responsibilities

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

1. Always knowledgeable of the project and fiscal status. This includes, but is not limited to, the project activities, partnership (i.e., partners, contractors, and Subrecipients, etc.), and regional activities; participant service delivery; project deliverables and Work Plan

progression; expenditure and grant program budget; and obstacles or delays to the project or overall outcomes.

2. Have knowledge, experience, and practice in managing State Standard Agreements and adhering to fiscal rules and requirements.
3. Assume responsibility for tracking and entering participant data timely and accurately on the Cal-E-Grants website, maintaining real-time case management services, and meeting all participant data reporting requirements (if serving participants).
4. Maintain active communication with key partners and the CWDB, as well as communicate any obstacles impeding the progression and success of the project to the CWDB.
5. Organize and coordinate regional activities.
6. Collect and report all data and partnership outcomes to the CWDB.

Specific Points of Contact

All Fiscal Agents/Grantees 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:

1. Project Lead Contact: The project lead who will engage with the CWDB on grant administration, project status, activities, and information requests.
2. Fiscal Contact: The person who knows the project budget and expenditures and responds to grant budget questions.
3. Participant Data Reporting Contact: The person who knows and/or oversees participant data entries and responds to participant data inquiries.
4. Networking Contact: Any additional person to share information on webinars, community of practice (CoP), peer learning events, networking opportunities, etc.

The Fiscal Agent/Grantee is responsible for keeping the SPOC form current, adjusting or editing the SPOC form, and notifying the CWDB of the changes in staff and points of contact.

Project Management

Cal-E-Grants: Project Management and Staff Accounts

The website, [Cal-E-Grants \(CEG\)](#), used to submit CWDB applications, will also be used for project management purposes. All staff directly reporting on project 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. *Individual accounts not linked to the Administrator account should be avoided.* If a 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, take the following steps to create a staff account:

1. Log in to the Administrator's account.
2. Select the **Manage Users** button at the top of the [Cal-E-Grants](#) website.
3. Select the **Add a New User** button (located in the top right corner above the yellow bar). A *Create New User* pop-up screen will appear.
4. Enter contact information for the new user (first and last name, email, and phone) and permission type.
 - a. The Permission Type drop-down has four options: Administrator, User, Data User Only, and Subrecipient.
 - i. *Administrator*: Can create, edit, update, delete, and/or submit applications, add users and/or update permissions of existing users, and have access to more sensitive aspects of the project.
 - ii. *User*: Can create, edit/update, and submit applications, but has restricted access to other aspects of the project.
 - iii. *Data User Only*: Can enter participant data for the grant project.
 - iv. *Subrecipient*: Can enter participant data for the project but does not have access to grant management as a grant partner.
5. Select the **Create** button once all information is entered. **Note**: Newly added staff will receive an email 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 promptly notified via email of any anticipated adjustments or deviations from the proposed work, and before changes can occur. Most changes and adjustments must be documented in a Modification Request on the CEG website, except for grant fund reallocations within a line item not exceeding 10 percent of the total amount of that specified line item. For example, the total amount for the Staff Salaries line is \$200,000 for two positions. \$100,000 is allocated to a Program Manager position, and \$100,000 is allocated to a Case Manager position. The Fiscal Agent/Grantee wants to move \$20,000 from the Program Manager's salary and add it to the Case Manager position.

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 modification, the Fiscal Agent/Grantee must complete and submit a Modification Request on the Cal-E-Grants website. Modification requests are not official until the request is completed, submitted, and approved by the CWDB.

The Fiscal Agent/Grantee will be asked to provide reason(s) and a thorough justification for all changes requested. Insufficient justification will result in a request being rejected and/or returned for additional details. Once additional details are added, it can be resubmitted.

The modification process will include the following steps:

1. Complete and submit a Modification Request on the Cal-E-Grants website by providing information for the Justification and Summary.
 - a. If assistance is needed, contact the Program Branch through the initiative inbox before starting a modification request on the Cal-E-Grant website.
 - b. If there is any change to the leveraged or match funds, reach out to the initiative inbox with a description of the change, the reason for the change, and the impact of the change on the budget.
2. Once the Justification and Summary are received, the CWDB will review the Modification Request for approval, rejection, or return for additional information. If approved, the CWDB will open the identified application tab or exhibit for revisions and

notify the Fiscal Agent/Grantee of the approval (on the Justification and Summary), including guidance on how and/or what to revise on the identified application tab or exhibit.

3. Make the requested revisions to the identified application tab or exhibit in the Cal-E-Grants system. Any revisions made outside of the approved Justification and Summary may delay the modification request process and/or result in rejection of the request.
4. Once the revisions are submitted, a second round of CWDB's review and approval will occur. 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. If the revisions are consistent and align with the approved Justification and Summary, the CWDB will provide formal written approval and any pertinent information or next steps.

Modification Request Submittal

The Fiscal Agent/Grantee needs to complete and submit a Modification Request within the grant term on the Cal-E-Grants website.

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

1. Log in to the [Cal-E-Grants](#) website.
2. Select the **Grants** button.
3. Select the **Grant ID** button and then choose the appropriate grant program.
4. Select the **New Modification Request** button.
 - a. Modification Requests, both completed and in process, can be found under the *Modification Requests* tab (located between the *Budget Allocation* and *Invoices* tabs).
5. Enter a name for the request.
6. Select the *Classification/Type* of request (e.g., Budget Modification, Partnership Changes, Work Plan Adjustment, etc.).
7. Provide justification for the request.
 - a. Justifications should include information such as the description and cost allocation of the item and/or service to be procured, the need for and/or reasonability of the modification, and how the item supports the goals and objectives of the project.
8. Provide a summary of the request.
 - a. Summary should include the following:
 - i. Total amount being moved.
 - ii. Line item(s) in which funds are being moved into and moved from.

iii. Adjusted total(s) for each line item.

b. Example:

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

- *Staff Salaries: \$30,000.00 (Original: \$35,000.00)*
- *Staff Travel: \$5,000.00 (Original: \$4,250.00)*
- *Supportive Services: \$25,000.00 (Original: \$20,750.00)*

9. Select the **Save** button once all information has been entered.

10. Read and accept the *Acknowledgment* notice that appears, then select the **Proceed** button.

11. Select the **Submit for Review** button.

Exhibit Revision Submittal

Take the following steps to edit and submit revised application tabs or exhibits:

1. The CWDB will send an email notification when the Justification and Summary of the modification request is approved and open the identified application tab or exhibit for revisions.
2. The Administrator and/or designated staff will revise the identified application tab or exhibit.
 - a. Budget Summary tab: Under the Modified Grants Funds column, the grant allocations will be pre-populated from the grant allocations of the Grant Funds column (which is the original budget). To make edits, locate the impacted line item (s) and enter the correct amount per approved Justification and Summary of the Modification Request. The amount for the Total Funding under the Modified Grants Funds column should be the same as the Total Funding under the Grant Funds column.
 - b. Columns and field boxes for leveraged or match funds are locked and cannot be edited.
 - c. Budget Narrative tab: If there is no grant fund allocation for a line item, ensure the response box for description is blank.
3. When edits are complete, select the **Submit for Approval** button.

It is highly recommended that the Fiscal Agent/Grantee save the revisions to each tab or exhibit periodically to prevent loss of work by clicking the **Save** button on each tab or exhibit.

Note: There may be an instance where you receive the completion notification, but the status of the submitted Modification Request is under review on the Cal-E-Grants website. The status

will change to *Approved* once the modification request revisions are incorporated into the Grant Agreement.

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 four (4) to five (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

The reporting schedule for the progress report is:

- January 1 through June 30 – Report due July 20
- July 1 through December 31 – Report due January 20

If the 20th falls on a weekend or holiday, reports are due the last business day prior to the 20th. 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

The Fiscal Agent/Grantee will complete and submit all progress reports on the Cal-E-Grants website.

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

1. Log in to the [Cal-E-Grants](#) website.
2. Locate and select the **Grants** button.
3. Select the project's **Grant ID** button for the appropriate grant program.
4. Select the down arrow to the right of the **New Invoice** button.
 - a. To check if a Progress Report has been created for the quarter, click the Progress Reports tab, which is between the Invoices and Participant Data tabs.
5. Select the appropriate quarter and type of report (e.g., Development, Implementation, or Expanding).
6. The *Title* field box is optional and not required when submitting the progress report.
7. Select the *Narrative* tab and follow the prompts to complete the progress report.
8. After completing the *Narrative* tab, select the **Save** button.
9. Upload supporting documentation to the *Documents* tab as needed. These could include an Implementation Plan, Participant Success Stories, Photo/Media Release Form, etc.
 - a. Select the **New** button.
 - 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 the **Upload Files** button.
 - d. Locate the document on your computer to upload.
 - e. Choose the **Done** button when the upload is complete.
10. Review the *Narrative* tab and verify all questions are answered with detailed and comprehensive responses, then select the **Submit** button.

Close-Out Report

The Fiscal Agent/Grantee will complete and submit the Close-Out report on the Cal-E-Grants website. If multiple partner organizations are involved, the Fiscal Agent/Grantee should 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.

1. On the project side, ensure all participant data and activities are up to date, compile qualitative and quantitative data, assess outcomes achieved by the project, document lessons learned and best practices, and more.
2. On the fiscal side, ensure activities such as spending down funds, paying off contractors/partner organizations for goods and services delivered, and informing the CWDB of unspent funds.

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.

Close-Out Report Submittal

The Fiscal Agent/Grantee will complete and submit the Close-Out Report on the Cal-E-Grants website.

Take the following steps to complete and submit the Close-Out Report:

1. Log in to the [Cal-E-Grants](#) website.
2. Select the **Grants** button.
3. In the upper left corner, select the drop-down menu under Grants and change the List Views to All.
4. Choose the appropriate Grant ID from the list and select the **Grant ID** hyperlink (example, G-0355).
5. Select *Close Out* from the Quarter drop-down menu. Note: The *Title* field box is not required to complete the Close Out Report.
 - a. Ensure the appropriate report is selected.
6. Select the *Narrative* tab and enter the responses.
 - a. Make sure to select the **Save** button to save progress.
7. After responding to questions in the *Narrative* tab, select the **Save** button.
8. Select the *Documents* tab to upload supporting documentation, if applicable.
 - a. Select the **New** button.
 - b. Enter the name of the document and select the format of the document (i.e., Word, Excel, PDF), then select the **Save** button.
 - c. On the *Documents* tab, locate the document entry created and select the **Upload Files** button.

- d. Locate the document to upload.
 - e. Select the **Done** button when the upload is complete.
9. Review the *Narrative* tab to ensure all questions are answered with detailed responses, then select the **Submit** button.

Periodic Review and Information Requests

As set forth in the Grant Agreement, the CWDB may conduct periodic reviews and request information at any time (and as needed) throughout the grant term. If the Fiscal Agent/Grantee is not performing in accordance with program requirements, the Fiscal Agent/Grantee 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/Grantee 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.

Invoice Report Submittal

The Fiscal Agent/Grantee will complete and submit the monthly invoice on the Cal-E-Grants website.

Take the following steps to complete and submit an invoice:

1. Log in to the [Cal-E-Grants](#) website.
2. Select the **Grants** button.
3. Locate and select the program's *Grant ID* for the appropriate grant program.
4. Select the **New Invoice** button. **Note:** Completed and in-process invoices can be found under the *Invoices* tab (located between the Modification Requests and Progress Reports tabs).
5. Select the appropriate month to invoice (e.g., if the grant term begins in January 2025, select *January 2025*).
6. Review the disclaimer and complete the *Authorizing Signature Name* before proceeding.
7. Complete the following invoice information:
 - a. **Grant Fund Expenditure:** The amounts for each line item for which expenses occurred during the invoice period in which reimbursement is requested. These should align with existing budget allocations and the Expenditure Plan.
 - b. **Leveraged Fund Expenditure (if applicable):** The amounts for each line item for which expenses occurred during the invoice period for which Leveraged/Match

funds are being accounted for. (These should align with the existing budget allocations and the Expenditure Plan.)

Note: Additional details regarding Leveraged/Match Funds can be found under the *Fiscal Monitoring and Documentation* section of this administration guide.

8. Select the **Save** button after completing the invoice.
9. If including supporting documentation (e.g., equipment purchase receipts), upload it in the *Documents* tab.
 - a. Select the **New** button.
 - b. Enter the document's name and select the document's format (i.e., Word, Excel, PDF). Then, select the **Save** button.
 - c. Under the *Documents* tab, locate the document entry created and select the **Upload Files** button.
 - d. Locate the document to upload.
 - e. Select the **Done** button when the upload is complete.
10. Review to ensure all amounts are correct, then select the **Submit** button.

Payment

The warrant generally will be mailed to the Fiscal Agent/Grantee at the address listed on STD 204 and/or STD 205 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 the payment timeline.

Please email the initiative inbox if the warrant is not received after 45 days from the processing date.

Fiscal Monitoring and Documentation

This section is intended to help Fiscal Agents/Grantees 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/Grantees have specific questions or require assistance with monitoring and/or documentation, they should send an email through the initiative inbox.

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

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.

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/Grantee will be required to complete the *Use of Funding Approval* form. The Fiscal Agent/Grantee 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/Grantee 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/Grantee must adhere to the following stipulations when completing the form:

1. Reimbursable child care costs must not exceed \$1,400 per child per month.
2. Maintain three quotes for a licensed child care provider for three years.
3. 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.

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 and 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:

1. Be responsive to all compliance monitors' Fiscal and Program Management requests.
2. Provide reasonable and timely access to records and staff.
3. Facilitate access to subcontractors and communicate with compliance monitors promptly and accurately.
4. 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.
5. Conduct regular oversight and monitoring of all Fiscal Agents/Grantees and their contractors.

-This requirement will ensure that expenditures meet the cost category and limitation requirements of CWDB and that all Fiscal Agents/Grantees are compliant with other applicable laws and regulations, and provide technical

assistance as needed.

6. 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.

[State Funded Program: Subrecipient and Contractor Management](#) (CWDB24-01) guidance and establishes procedures regarding the distinction between sub-recipients and contractors, as well as 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

As set forth in the Grant Agreement, Fiscal Agents/Grantees 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/Grantees 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/Grantee's discretion to determine and produce if requested.

The CWDB applies federal standards regarding [Record Retention and Access](#) to its state grant funded initiatives.

Communication and Branding

Branding and Communications Guidelines

Fiscal Agents/Grantees 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/Grantees 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:

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