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Post-Award Frequently Asked Questions

Connecting Minority Communities Pilot Program

U.S. Department of Commerce

National Telecommunications and Information Administration

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Post-Award Frequently Asked Questions

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Communications

Q: Is email the primary means of communication between grantees and Federal Program Officers (FPOs)?

A: Yes, all reports will be submitted via email. Grantees should submit the Baseline Report, the Annual Report, and the Annual Certification to the assigned FPO via email with greports@nist.gov CC'd. To submit the Quarterly Financial Report (FFR), the Final Financial Report, the Performance (Technical) Report, the Annual Performance (Technical) Report, and the Final Performance (Technical) Report [the Closeout Report], email the report to greports@nist.gov with the assigned FPO CC'd.

FPOs are also available via phone and video call. In addition, FPOs will hold quarterly conference calls with recipients.

Q: Can email notifications for award deadlines be sent to other members of the project team?

A: Notifications are sent to the Point of Contact and Authorized Representative named on the application. Recipients must notify their Federal Program Officer of any additional project team personnel in the NIST Grants Management Information System (GMIS), recipients must submit an Unfunded Grant Action (UGA) to the UGAM inbox (UGAM@nist.gov).

Q: Are Office of Minority Broadband Initiatives (OMBI) CMC Pilot Program team members available for meetings and trainings with recipients?

A: The assigned FPO will hold regular meetings with grant recipients to discuss the project's progress. Webinars will be held for CMC Pilot Program recipients on various technical assistance topics. More information on the time and date of the training webinars will be posted soon.

Please communicate with the assigned FPO regarding topics you would like to learn more about. The NIST Grants Management staff will provide additional training on topics as required.

Grants Compliance and Monitoring

Q: Where can I find Uniform Administrative Requirements, Cost Principles, and Audit Requirements?

A: For detailed information on these requirements please visit https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200.

Q: Where can I find the Department of Commerce Financial Assistance Standards Terms and Conditions?

A: The DOC will apply the Financial Assistance Standard Terms and Conditions to each award in this program in effect on the date of the award. The current version, dated November 12, 2020, is accessible at the DOC Financial Assistance Standard Terms and Conditions.

Q: What are Specific Award Conditions (SACs)?

A: SACs are requirements that may be imposed on recipients in addition to standard and program-specific terms and conditions. Each recipient may have different SACs listed in their Award Agreements (CD-450s). SACs with a deadline must be satisfied with a UGA by the deadline, while administrative SACs must be satisfied by the end of the award. If a recipient needs an extension for a deadline specified by a SAC, a UGA request for a SAC extension should be completed before the deadline in question.

Q: What are a grant recipient's obligations regarding the prevention of waste, fraud, and abuse?

A: In accordance with specific award conditions and consistent with statutory requirements in the Consolidated Appropriations Act, 2021, and in 2 CFR Part 200, at any time(s) during the grant period of performance, NTIA may direct a grant recipient's key personnel to take a government-provided training on preventing waste, fraud, and abuse. Key personnel include those responsible for managing the grant recipient's finances and overseeing any contractors, subcontractors, or subrecipients (for financial matters and/or general oversight related to the grant). NTIA will provide instructions on when and how to take such training(s), and costs incurred by a recipient relative to the training (*e.g.*, staff time) are eligible for reimbursement pursuant to the NTIA award.

Further, grant recipients must monitor award activities for common fraud schemes, including but not limited to:
- False claims for materials and labor,
- Bribes related to the acquisition of materials and labor,
- Product substitution,
- Mismarking or mislabeling on products and materials, and
- Time and materials overcharging.

Should a grant recipient detect any fraud schemes or any other suspicious activity, the grant recipient must contact its assigned FPO and the DOC, Office of Inspector General Hotline, as indicated at https://www.oig.doc.gov/Pages/Contact-Us.aspx, as soon as possible. Additionally, in accordance with 2 CFR § 200.113, an applicant or grant recipient must disclose, promptly, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Non-Federal entities that have received a Federal award are required to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make required disclosures can result in any of the remedies described in 2 CFR § 200.339. See also 2 CFR Part 180, and 41 USC § 2313.

Q: What are best practices in preventing mismanagement of federal grant funds?

A: One best practice to avoid mismanagement of federal grant funds is to be in close coordination with and develop a close working relationship with the assigned FPO and Grant Officer. The FPOs and Grant Officer know the grant terms, rules, and conditions, which can help prevent grant recipients from falling out of compliance with the terms and conditions of the CMC award.

Also, grant recipients should adhere to deadlines and milestones regarding reports. Work closely with the assigned FPO and submit your reports on time. Understanding the conditions

of the award, due date, and reporting dates, etc. will also assist in avoiding mismanagement of federal grant funds. There are several critical reports grant recipients need to submit. Make sure to follow the submission guidelines on the NIST website. Grant recipients can also find guidance on submitting reports in the Recipient Handbook, Reporting Guidance and Instructions, and the Broadband USA website.

There are important and critical responsibilities when it comes to the proper management of federal grant funds. The assigned FPO and GS are the best tool grant recipients possess in avoiding mismanagement of federal grant funds.

Q: What documentation should recipients have in their files regarding personnel time? Will NTIA ask to see these documents?

A: Recipients should follow their institution's policies and procedures regarding personnel time. Recipients should have the following personnel documents filed internally and readily available in the event of an audit, desk review, site visit, or at the request of NTIA:
- Organizational Chart
- List of roles and responsibilities of key personnel
- List of Organizational Partners
- List of subrecipients and contractors
- Detailed timesheets for program staff
- Detailed paystubs for program staff

The same or similar documentation should be available for all subrecipients involved in your project, following your institution's policies and procedures on subawards. See 2 C.F.R §§ 200.332, 200.334 and 200.430 for additional information.

Q: What are the CMC Pilot Program monitoring activities?

A: Monitoring activities for CMC Pilot Program projects include:
- **Report Reviews:** Reviewing recipient reports for completeness, accuracy of information, and potential compliance issues.
- **Conference Calls:** Method of regular communication between recipients and FPOs.
- **Desk Reviews**: Review of a recipient's progress towards the project's planned objectives and deadlines by analyzing reports and other documentation the FPO requests from the recipient. A desk review is similar to a site visit,but does not include an in-person visit to the project site.
- **Site Visits:** Visits to the geographic location of a recipient's project conducted by the FPO in order to monitor a recipient's progress towards project objectives and deadlines. A site visit is similar to a desk review but is more thorough because it includes an in-person examination of the project site.
- **Technical Assistance:** A collaborative engagement between the Program Office and recipient designed to provide targeted and specific information about grants management or to correct areas of programmatic and/or administrative noncompliance or concern.

Q: How are recipients selected for report reviews, conference calls, desk reviews, site visits, or technical assistance?

A: NTIA's Office of Internet Connectivity and Growth (OICG) assesses initial monitoring levels based on a weighted score of multiple criteria. Certain scoring thresholds determine the level of monitoring required for the recipient, but all recipients will be monitored by conference calls. FPOs conduct the initial post-award risk assessment, which generates a cumulative risk score for the grant. This is used to determine the level of monitoring the recipient will receive (Standard, Intermediate, or Advanced).

Q: If my organization/agency is selected for a desk review or site visit, how will we be notified and what should we do to prepare?

A: The process for desk reviews and site visits is as follows:

Desk Review: FPOs will notify the recipients selected for a desk review electronically and in writing. A pre-review conference call will be held to prepare the recipient for the desk review by explaining what will be reviewed, the required stakeholders who should attend, and the dates and time of the review.

Site visits: Recipients will be selected for a site visit in advance in order for FPOs to plan for the site visit. FPOs will notify recipients electronically and in writing in advance of a site visit. A pre-review conference call will be held to prepare the recipient for the site visit by explaining what will be reviewed, the required stakeholders who should attend, and the dates and times of the visit. Sufficient notice will be given to allow recipients time to prepare and to make available for inspection the files or documents requested by the FPO.

Q: What are some documents that could be reviewed and/or requested for a desk review or site visit?

A: The following documents may be reviewed and/or requested are:
- Policies and procedures to administer Federal grants
- Ethical standards of conduct documentation
- ASAP drawdown procedures
- Organizational chart
- Procurement policies
- Payroll processing procedures and timesheet validation
- Fringe benefits for grant-funded employees
- Purchase orders, invoices, and proofs of payment for contractors and materials purchases for grant-funded activities
- Any other award or project documentation identified for review by NTIA or by the NIST Grants Office.

Q: When providing broadband services to individuals, do grant recipients need a self-attestation form and/or proof that the individual meets the required criteria (Pell grant recipient, receiving unemployment benefits, low-income, etc.)?

A: The NOFO requires that recipients prioritize distributing subsidized computers and discounted Internet access to low-income community members and students.

The NOFO states that recipients are required to prioritize low-income students and community members for the distribution of computers and eligible equipment. The NOFO does not require a

specific type of documentation. A self-attestation form developed by the institution and/or the institution's student aid records is acceptable.

Q: Regarding loss prevention mechanisms, are there any suggestions or policies and procedures to adopt for the loaner programs?

A: NTIA will be providing a number of Technical Assistance (TA) webinars to recipients, one of which will focus on loaner device distribution. We will also provide information and training on documentation for equipment and supplies acquired pursuant to a CMC award.

In accordance with the NOFO, any recipient that lends or provides eligible equipment to students or patrons must prioritize the lending or providing of such equipment or devices to students or patrons that the recipient believes do not have access to such equipment. For additional information regarding managing equipment, including replacement of equipment, see 2 CFR § 200.313.

Q: Will there be opportunities for CMC Pilot Program recipients to gather and share lessons learned?

A: When your organization accepted its CMC grant, it joined the OMBI CMC Pilot Program family and there are many stakeholders under this umbrella. The CMC Pilot Program team is here to support grant recipients with any grant management needs. There will be opportunities for grantees to come together the grant period to discuss best practices. NTIA has recently launched the CMC Learning Network (CMC-LN) for grant recipients to communicate directly with each other and share experiences. FPOs are also available to you to share lessons learned across recipients.

In addition, in 2023, the FPOs will host and facilitate many webinars and meetings to help with grant management. There will also be regional meetings in which grantees can come together with federal grants staff to discuss their projects.

Finally, the FPOs want to hear from grant recipients regarding any local and/or regional events that you know about. Grant recipients may know about programs and events that FPOs are not aware of. These events may be a wonderful opportunity to showcase your work, as well as the CMC Pilot Program's work.

Allowable and Unallowable Costs

Q: What are eligible costs for the CMC Pilot Program?
A: To the extent reflected in a grantees approved project budget, a CMC grant may be used to:
- Fund personnel costs, including salaries and fringe benefits.
- Fund increases in broadband networking capability, hardware, software, and other digital technology for broadband services, remote education, and distance learning.
- Fund equipment and devices (such as laptops, tablets, and hotspots, but excluding mobile phones).
- Fund, provide, and implement affordable broadband programs that facilitate greater access to broadband services, devices, and equipment.
- Fund, provide, and implement digital training, education, technology support, outreach, and awareness programs including workforce development and IT training.
- Fund access to broadband services.

- Conduct needs assessments and develop plans for increasing broadband adoption and access to remote education.
- Fund Program Evaluation and Data Collection activities to collect data and document best practices for replicable and sustainable programs.
- Fund subawards and contractual costs associated with carrying out programmatic activities.
- Fund reasonable pre-application expenses in an amount not to exceed $50,000
- Fund other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs.

Q: What are ineligible costs for the CMCPP?

A: Ineligible costs include those costs that are unallowable under the applicable Federal cost principles. Ineligible costs include the following:
- Certain telecommunications and video surveillance services or equipment
- Profit and fees
- Prohibited uses of equipment
- Construction activities[1]
- Pre-award costs in an amount exceeding $50,000
- Loan repayment and loan collateral
- Previously incurred costs and duplication of funding

Eligible costs are defined in 2 CFR Part 200.402 through 200.405. Institutions of higher education should also refer to Part 200.418 and 200.419. Please refer to Section J of the [CMC Pilot Program Notice of Funding Opportunities](#) for more guidance on eligible and ineligible costs.

Q: May grant funds be used to deploy and/or improve existing broadband infrastructure that is not located on the campuses of the eligible educational institutions?

A: No. Eligible educational institutions may only use grant funds to install or upgrade broadband facilities on a one-time, capital improvement basis within their own campus locations.

Q: Can NTIA funds be used as a match for other Federal funding?

A: No. The Consolidated Appropriations Act of 2021, which authorized the CMC Pilot Program, does not expressly authorize funds to be used as the non-Federal cost share for another Federal award. Express statutory language allowing the use of CMC funds as cost share is the legal requirement to use Federal grant funds as matching funds for another grant program. Therefore, funds awarded under the CMC Pilot Program may not be used as a match for other Federal funding. *See* 2 C.F.R. 200.306(b)(5).

Q: Can my organization use Federal funds to host a meeting or conference?

A: A conference is defined as a meeting, retreat, seminar, symposium, workshop, or event whose primary purpose is the dissemination of technical information beyond the non-Federal

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[1] The CMC Pilot Program generally prohibits traditional outside plant and network construction activities. However, in-building or classroom wiring, deploying fiber through existing conduit or trenches, installing wireless access/router/AP units, installing wireless transmission equipment are not considered construction activities for purposes of the CMC Pilot Program and are allowable to the extent reflected in a CMC recipient's approved project narrative.

entity and is necessary and reasonable for successful performance under the Federal award. To the extent reflected in a CMC recipient's approved project budget, allowable conference costs paid by the non-Federal entity as a sponsor or host of the conference may include **rental of facilities, speakers' fees, costs of meals and refreshments, local transportation, and other items incidental to such conferences** unless further restricted by the terms and conditions of the Federal award. As needed, the costs of identifying, but not providing, locally available dependent-care resources are allowable. Conference hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary, and managed in a manner that minimizes costs to the Federal award. The Federal awarding agency may authorize exceptions where appropriate for programs including Indian tribes, children, and the elderly. See also 2 CFR § 200.432, 200.438, 200.456, and 200.475.

Q: Is the purchase of food for a conference or event an eligible expense?

A: To the extent reflected in a CMC recipient's approved project budget, grant recipients may utilize Federal funds to pay for food and/or refreshments at a conference. As a conference host or sponsor, grant recipients must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award. The Federal awarding agency may authorize exceptions where appropriate for programs including Indian tribes, children, and the elderly. See also 2 CFR § 200.432, 200.438, 200.456, and 200.475.

Q: What types of costs would be allowable in the case of an award termination?

A: Affected recipients will negotiate with the Federal awarding agency to determine costs that will be considered allowable on a case-by-case basis. See 2 CFR 200.340 through 200.343.

Q: Can a CMC grantee use grant funds to prepay for multiple years of qualifying broadband service?

A: Yes, so long as the cost and terms are reasonable, eligible under the NOFO, and the grantee makes full payment for that service during the grant's two-year period of performance. If an applicant intends to use grant funds in this way, the applicant must include a detailed description of such proposed costs in its application, including the proposed period of service. NTIA may include a specific award condition in any such award to ensure that the funds are used appropriately, and to ensure that if the service is cancelled and/or the grantee receives a refund, any grant funds returned to the grantee are subsequently returned to the Federal government.

Disbursement of Funds

Q: What is the process for disbursement of funds? What is the typical timeframe?

A: Unless otherwise stated in a Specific Award Condition (SAC), the advance method of payment will be authorized. Non-Federal entities must time advance payment requests so that Federal funds are on hand for no more than 30 calendar days before being disbursed by NFE for allowable award costs. Payments from the Department of Commerce (DOC) to recipients, or a pass-through entity, will be made using the Department of Treasury's ASAP system. Under the ASAP system, payments are made through preauthorized electronic fund transfers directly to the recipient's bank account (not subrecipients). To receive payments under ASAP, recipients

are required to enroll with the Department of Treasury, Financial Management Service, and Regional Financial Centers, which allows them to use the online and Voice Response System (VRS) method of withdrawing funds from their ASAP established accounts.

Recipients request payment via ASAP.gov and approved payments can settle as quickly as the same day. Only the prime recipient may directly draw down Federal award funds. In this connection, it is the prime recipient's responsibility to review subrecipient and vendor invoices and to make award payments to subrecipients and vendors.

Reporting Requirements

Q: What is the period of performance for my grant?

A: Your period of performance start date and end date can be found in the CD-450. The period of performance for the CMC Pilot Program is generally no more than two years. However, NTIA [with Assistant Secretary approval] may extend the initial two-year award period for a recipient that proposes to use the grant funds for program purposes if the recipient certifies that: (i) the recipient has a plan for use of the grant funds; (ii) the execution or implementation of the project is underway; and/or (iii) extenuating circumstances require an extension of time to allow the project to be completed. The recipient may submit a request for an extension of the award period not later than ninety (90) calendar days before the end of the award period.

Q: What are the reporting requirements for CMC Pilot Program recipients?

A: There are both Financial and Performance Reports required for CMC recipients. The following reporting requirements are described below:

Financial Reports: Each award recipient will be required to submit an SF-425: Federal Financial Report on a quarterly basis for the periods ending March 31st, June 30th, September 30th, and December 31st. The quarterly Federal Financial Reports are due 30 days after the end of each quarter and must report on expenditures/obligations made during each quarter. An SF-425 form must be submitted even if expenditures/obligations were not made during the quarter. The SF-425 can be found online here: Federal Financial Report.

All SF-425s should be submitted to greports@nist.gov with a copy to your assigned FPO. In the email subject line, recipients should include the recipient's name, NIST award number, and reporting period. The recipient's contact information should be included in the body of the message.

A final SF-425, Federal Financial Report, is due 120 days after the end of the period of performance and should be submitted via email to greports@nist.gov with a copy to the designated FPO. See 2 CFR § 200.344 for more information.

CMC Required Financial Reports				
Report Type	**Reporting Period**	**Report Deadline**	**Submission Method**	**Data Submitted**
Quarterly Federal Financial Report	Jan. 1–Mar. 31 Apr. 1 June 30 July 1-Sept. 30 Oct. 1-Dec. 31	April 30 July 30 October 30 January 30	**Form**: SF-425 Federal Financial Report (FFR) Submit via email to greports@nist.gov CC: assigned FPO	Performance on key financial indicators.
Final Financial Report	Cumulative award period	120 days after end of the project period	**Form**: SF-425 FFR Submit via email to greports@nist.gov CC: assigned FPO	Performance on key financial indicators.

Baseline Report: The Baseline Report details project metrics data as well as key outputs and projected outcomes from the grant project. Grant recipients will provide milestones regarding equipment deployment, professional development, broadband adoption, etc. It gives grant recipients the opportunity to share their goals and their expected timeline with their assigned FPO, and to provide context for the grant project.

The recipient will receive guidance via email on completing the Baseline Report and HSR Memo in advance of the submission deadline. These items are due 45 days after the award start date.

Performance (Technical) Reports: Each recipient will be required to submit a technical progress report to the FPO, Grants Officer, and GS named in the award documents on a semi-annual basis for the periods ending March 31 and September 30 of each year. Reports will be due within 30 days of the end of the reporting period. Technical progress reports shall contain information as prescribed in 2 CFR § 200.329.

Annual Report: Not later than one year after receiving grant funds under the CMC Pilot Program, and annually thereafter until the funds have been expended, an eligible recipient shall submit to the Assistant Secretary (via email to the assigned NTIA FPO) a report, with respect to the one-year period immediately preceding the report date, that:
   a. describes how the eligible recipient expended the funds (examples include a description of services provided, equipment purchased, the number of locations on campus or in anchor communities at which broadband Internet service was improved or connectivity expanded using the grant funds, and the number of students/patrons connected);
   b. certifies that the eligible recipient complied with the requirements of the Act and the CMC Pilot Program; and
   c. identifies each subrecipient that received a subgrant from the eligible recipient and a description of the specific project for which grant funds were provided.

Annual Certification: Each recipient must submit an Annual Certificate within 30 days after the end of each Fiscal year in which grant funds are available. This certifies that the grant recipient

is in compliance with all required statutory and programmatic conditions. A copy of the Annual Certificate can be found in Appendix A to the CMC Pilot Program NOFO: Certification regarding Compliance with Statutory and Programmatic Requirements

CMC **Required Performance Reports & Certification**				
Report Type	**Reporting Period**	**Report Deadline**	**Submission Method**	**Data Submitted**
Baseline Report	Baseline	Within 45 days of the award start date	**Form**: Baseline Report Submit via email to your CMC Pilot Program FPO CC: greports@nist.gov	Baseline project plans and details regarding key outputs and outcomes from the project.
Semi-Annual Performance (Technical) Report	Oct. 1–Mar. 31 Apr. 1–Sept. 30	April 30 October 30	**Form**: Performance (Technical) Report Submit via email to greports@nist.gov CC: Your assigned FPO	Performance on key programmatic indicators and budget.
Final Performance (Technical) Report [Closeout Report]	Cumulative award period	120 days after end of the project period	**Form**: Performance (Technical) Report Submit via email to greports@nist.gov CC: Your assigned FPO	Performance on key programmatic indicators and budget.
Annual Report	1 year period preceding report date	No later than 1 year after receiving grant funds; annually thereafter	**Form**: Annual Report Email to your assigned FPO CC: greports@nist.gov	Describe how funds were expended, certify that the covered partnership complied with all requirements, and identify each subrecipient that received a subgrant, with a description of the specific project.
Annual Certificate	Oct. 1-Sept. 30	Oct. 30	**Form:** Appendix A of the CMC Pilot Program NOFO Email to your assigned FPO	Confirm compliance with all required statutory and programmatic conditions.

CMC **Required Performance Reports & Certification**				
Report Type	**Reporting Period**	**Report Deadline**	**Submission Method**	**Data Submitted**
			CC: greports@nist.gov	

Q: When does the reporting period begin?

A: The reporting period start date varies depending on the report. Please reference the above tables and/or the Recipient Handbook for the reporting period start and end dates of specific reports.

Q: How should recipients request an extension on reports?

A: To receive an extension on a report and stay in compliance, recipients must submit a request to UGAM@nist.gov explaining the situation and providing a target submission date, copying their assigned FPO. The FPO team can provide additional guidance on completing and submitting reports. Before you request a report deadline extension, please contact your FPO.

Unfunded Grant Actions

Q: What are Unfunded Grant Actions (UGAs)?

A: UGAs are one-time or irregular events involving changes to a recipient's project that require prior approval. Depending on the change, a UGA may result in an amendment to the award document (Form CD-451). Examples of UGAs include budget modifications, change in key personnel, change in scope, and satisfied SACs.

Recipients must consult with their FPO about the proposed UGA prior to submission to ensure the Program Office is notified of the change. Recipients then submit a request to UGAM@nist.gov, copying the assigned FPO. The NIST Grant Specialist and Grants Officer will review and provide final approval of the UGA, and may request additional information form the recipient, if necessary.

Q: What changes to my award require written prior approval (*see* 2 C.F.R. 200.407)?

A: Changes to the award that require written prior approval include:

Change in Scope or Objective of the Project: Actions likely to be considered a change in scope (and therefore require Federal agency pre-approval) include, but are not limited to, the following:

(1) change in the specific goals and objectives approved at the time of the award;
(2) shift of the research emphasis;
(3) change in the approved project areas or species; or

(4) change in the amount of work from the approved project description (e.g., number of samples collected).

Budget Modification/Revision: Required when the new direct cost category exceeds 10% of the total award amount using the most recent approved budget. Note that if the change in budget is 10% or less of the entire budget, a budget modification is not necessary (see Section B.04.b. of the DoC Financial Assistance Standard Terms and Conditions).

Changing your Authorized Organization Representative: The AOR is authorized to sign on behalf of the grant recipient. The Federal awarding agency will need to receive a statement in writing describing why the change is being made and providing the new AOR's name and contact information (email address, phone number, and resume).

Q: How do I submit my prior award approval request?

A: Prior approval requests should be submitted in writing (via email) to UGAM@nist.gov and the assigned FPO at least 30 days in advance of the proposed action when possible.

Q: Are there specific templates for requesting a change of budget or scope?

A: Any proposed budget revisions or changes in scope should be discussed with the assigned FPO. Any financial revisions should include a revised SF-424A, a detailed budget spreadsheet, and a revised budget narrative.

Q: Due to the award date, we may need to change the timeline of our project and make some adjustments. What is the best way to share, receive input, and solidify the new plan before the Baseline Report is due?

A: The best way to solidify the new project plan and/or budget is to email the updated information to the assigned FPO. They will be able to guide recipients through the process of updating the project timeline and/or the project budget. Recipients are required to report deviations from budget, project scope, or objective and request prior approvals from Federal awarding agencies. See 2 CFR § 200.308 for more detail. To modify the project budget, recipients will need to first consult with the assigned FPO, and then submit a UGA to UGAM@NIST.gov, copying their FPO.

Prior to the Baseline Report due date, the CMC Pilot Program FPO team will send grant recipients a sample Baseline Report and report guidance. If you have additional questions after reviewing the provided guidance materials, please call or email the assigned FPO. The FPO team is available to help grant recipients with reporting requirements and grants management.

Q: Can UGAs be requested via the Baseline Report?

A: Reports are distinct from UGA requests and will need to be submitted separately. Recipients must consult with their FPO about the UGA they'd like to submit to ensure the Program Office is notified of the change. Recipients must then submit a request to UGAM@NIST.gov copying their FPO. The GS will coordinate with the FPO on the final decision.

Q: Can we extend the project period of performance? How do I request a project extension?

At the discretion of the Assistant Secretary, there is a possibility for a project extension with appropriate justification. A project extension is considered a UGA. Recipients will need prior approval and must submit their request via email to UGAM@nist.gov at least 90 days in advance of the original award end date.

To be considered for an award extension, the CMC NOFO states the Assistant Secretary may extend the initial two-year award period for an eligible recipient that proposes to use the grant funds for program purposes if the eligible recipient certifies that:
    (i) the eligible recipient has a plan for use of the grant funds;
    (ii) the execution or implementation of the project is underway; and/or
    (iii) extenuating circumstances require an extension of time to allow for the project to be completed.

Recipients must consult with the assigned FPO before submitting the UGA request to the Grants Officer.

Q: Will I receive additional Federal funds if my project is granted an extension?

A: No. All extensions are considered no-cost extensions and will only result in an extended project period of performance.

Q: If an extension is granted, can the grantee incur expenses during the extension period, or must all expenses be incurred during the initial period of performance?

A: Eligible expenses must be incurred during the award's period of performance. A grantee that receives an extension of the award period from the Assistant Secretary after submitting a request in accordance with Section II.B of the NOFO may incur eligible expenses during the approved extended award period.

Subawards (see 2 C.F.R. 200.331 – 200.333)

Q: Is my organization allowed to have subrecipients?

A: Yes. To the extent identified in an approved project budget, a CMC recipient may enter into a subaward with a subrecipient, including a non-Tribal entity, as part of its grant funds under this program.

Q: What is the definition of a subrecipient?

A: According to 2 CFR § 200.93, a subrecipient is defined as a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. *See also* 2 C.F.R. 200.331 concerning subrecipient and contractor determinations.

Q: Are pass-through entities required to check subrecipient debarment?

A: Yes. Pass-through entities must verify that the entity or person with whom it intends to do business is not excluded or disqualified. This can be done by checking SAM.gov Exclusions;

collecting a certification from that entity or person; or adding a clause or condition to the covered transaction with that person.

Q: How do I know if I am providing Federal funding to a subrecipient as opposed to a contractor/vendor?

A: Please refer to the factors in 2 C.F.R. 200.331 concerning subrecipient and contractor determinations.

Q: Are subcontractors and suppliers considered subrecipients?

A: Please refer to the factors in 2 C.F.R. 200.331 concerning subrecipient and contractor determinations. Generally, the nature of the relationship determines whether an agreement is considered a subaward or a contract. *Recipients may refer to an entity as a subcontractor or supplier, but they may be considered a subrecipient for the purposes of applying the Uniform Guidance requirements.* A subaward is made for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the recipient. A contract is made for the purpose of obtaining goods and services for the recipient's use and creates a procurement relationship with the contractor.

Q: What is the difference between a subrecipient and a contractor/vendor?

A: Please refer to the factors in 2 C.F.R. 200.331 concerning subrecipient and contractor determinations. There are several differences between the two. The following generally describes the characteristics of a subrecipient and contractor/vendor.
- **Subrecipient:**
  - Performance is measured against whether the objectives of the program are met
  - Responsible for programmatic decision making
  - Adheres to applicable program compliance requirements
  - Uses the sponsored program funds to carry out their portion of the programmatic effort of the project
- **Contractor/Vendor:**
  - Provides goods and services within normal business operations
  - Provides similar goods and services to many different purchasers
  - Operates in a competitive environment
  - Provides goods and services ancillary to the operation of the program
  - Provides goods and services which are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons

Q: When is a subrecipient required to submit final reports?

A: Subrecipients must submit final reports within 90 days after the period of performance end date as described in 2 CFR § 200.329(c)(1).

Audits

Q: What are the Audit requirements for CMC Pilot Program recipients?

A: The provisions of 2 CFR § 200 Subpart F, adopted by the DOC through 2 CFR § 1327.101 require any non-Federal entity (*e.g.*, non-profit institutions of higher education and other non-profit organizations) that expends Federal awards of $750,000 or more in the recipient's fiscal year to conduct a single or program-specific audit in accordance with the requirements set out in the Subpart. Additionally, unless otherwise specified in the terms and conditions of the award, entities that are not subject to Subpart F of 2 C.F.R. Part 200 (e.g., commercial entities) that expend $750,000 or more in grant funds during their fiscal year must submit to the Grants Officer either: (i) a financial related audit of each DOC award or subaward in accordance with Generally Accepted Government Auditing Standards; or (ii) a project specific audit for each award or subaward in accordance with the requirements contained in 2 C.F.R. § 200.507. Applicants are reminded that NTIA, NIST, the Department of Commerce Office of Inspector General, or another authorized federal agency may conduct an audit of an award at any time.

Q: Where should copies of audits required by 2 CFR § 200 Subpart F be sent?

A: In accordance with 2 CFR § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), grantees that are states, local governments, or non-profit organizations must submit copies of their audit reports to the Federal Audit Clearinghouse (FAC). An auditee that is an Indian tribe or a tribal organization may opt not to authorize the FAC to make the reporting package publicly available on a website, by excluding the authorization for the FAC publication. See 2 CFR § 200.512(b) for additional information.

Q: What are some of the common audit findings?

A: Some common audit findings for Federal awards include:
- Lack of written policies and procedures.
- Inadequate documentation on file.
- Failure to obtain prior approval or starting an activity before authorized.
- Inadequate or untimely report submission.
- Unallowable costs per grant terms and conditions.
- Failure to verify excluded parties when contracting.
- Excess cash on hand.
- Commingling of funds.

Reach out to your FPO if you need assistance in creating adequate grants and financial management policies and procedures.

Q: Can required audits be paid for using grant funds? How do we proceed with an audit if the cost was not accounted for in the original budget proposal?

A: If a recipient expends more than $750,000 per year, they will be subject to a single audit requirement, and it can be paid for as an indirect cost using grant funds to the extent reflected in a CMC recipient's approved project budget. The audit requirement is standard across all federal grants, and personnel at your institution may be familiar with the process.

Closeout

Q: What is my responsibility as a grant recipient when closing out a grant?

A: According to 2 CFR § 200.344, your responsibilities as a recipient of a Federal award during the 120-day closeout period include the following:

- Submit final Federal Financial Report (SF-425) and final Performance Report.
- Verify all Specific Award Conditions (SACs) have been satisfied
- Complete award goals and objectives.
- Submit final payment request.
- Submit report of acquired property (purchased with Federal funds).
  - SF-428-Tangible Personal Property Forms (equipment and supplies)
  - SF-429-Real Property
- Return excess payments.

The final Performance (Technical) Report should be cumulative of all activities conducted by the recipient. In the General section of the report template, check "Yes" that this is the Final Report. Submit this report via email to greports@nist.gov with the designated FPO CC'd.

The Final SF-425, Federal Financial Report, should include all financial transactions that occurred during the award period of performance. Final SF-425 details all financial transactions from award inception to the completion of the award, including costs that may be incurred during closeout (i.e., wrap-up activities such as paying salaries). The final FFR may not include any unliquidated obligations or cash on hand. This report is due 120 days after the end of the period of performance and should be submitted via email to greports@nist.gov with the designated FPO CC'd.

Specific Award Conditions: Ninety calendar days before the period of performance end date, recipients will meet with their designated FPO to assess outstanding SACs. If there are outstanding SACs, work with the designated FPO to submit them before the period of performance end date.

The SF-428-Tangible Personal Property Forms are for equipment acquisition and/or an aggregate sum of supplies of $5,000 or greater, purchased with federal funds that remain in the organization's possession. If you do not have equipment or supplies acquired or remaining that is $5,000 or greater, complete the cover page indicating "no tangible personal property (equipment or supplies) valued at $5,000 or greater" on line #8 in the Comment section and mark "No" in line #7. If you do have equipment (or supplies) valued at $5,000 or greater, complete the remainder of the form. You must also complete the SF-428-B and SF-428-S.

The SF-428-B must be completed by recipients with a residual inventory of equipment or unused supplies exceeding $5,000 in total aggregate value.

Recipients who have equipment and/or supplies worth $5,000 or greater to report will also have to submit the SF-428-S.

Form SF-429- Real Property Status Report is a standard report to be used by recipients of Federal financial assistance to report real property status or to request agency instructions on real property that was/will be provided as Government Furnished Property (GFP) or acquired (i.e., purchased or constructed) in whole or in part under a Federal financial assistance award. This includes real property that was improved using Federal funds and real property that was donated to a Federal project in the form of a match or cost share donation. This report is to be used for awards that establish a Federal Interest on real property.

Final Evaluations: Per the NOFO, CMC required all grant applicants to submit evaluation plans. All CMC recipients are required to implement the evaluation plans submitted in their applications. In addition to the Final Performance Report, CMC recipient program evaluation reports are to be submitted as part of the grant close-out requirements. Evaluation reports are to be based on project goals and objectives. The evaluation report should report short-term project impacts and indicators for assessment of long-term impact. Evaluation reports should provide a comprehensive look at the impacts of the investment on CMC anchor institutions and target anchor communities, the roles of participating organizations, and the nature and degree of the effects on the problem areas the grants were to tackle.

Project evaluation reports should provide useful information to those interested in replicating, or adapting, CMC Pilot Program projects. Taken collectively, evaluations should provide practitioners with guidance in the development of new projects. In addition, CMC project evaluation reports are to provide the OMBI with feedback for future program planning and for the OMBI yearly report with recommendations to the Congress.

Q: When will I be notified that my grant has officially closed?

A: The CMC Pilot Program grant has closed when NIST has reviewed all reports and verified that the grant recipient has met all SACs. The final determination of grant closeout is under the purview of NIST. Once the grant award has closed, recipients will not be able submit reports or process further transactions.

Q: What could be some possible delays in closing out my grant?

A: Common delays could include SACs that have not been satisfied, delinquent reports, delays in returning excess funds, or a Single Audit report that is not current.

Q: What should I do if my organization has remaining funds?

A: If it is determined that funds have been drawn down and have not been obligated by the end of the performance period, the CMC Pilot Program recipient should provide a written explanation for the overdraw with corresponding backup documentation and award number. The overdrawn amount should be returned to ASAP via the Automated Clearing House (ACH) or via FEDWIRE by the recipient's financial institution.

Q: How do I repay the excess funds?

A: Funds that have been withdrawn through ASAP may be returned to ASAP via the Automated Clearing House (ACH) or via FEDWIRE. The ACH or FEDWIRE transaction may only be completed by the Recipient's financial institution. Full or partial amounts of payments received by a Payment Requestor/Recipient Organization may be returned to ASAP. All funds returned to the ASAP system will be credited to the ASAP Suspense Account. The Suspense Account allows the Regional Financial Center to monitor returned items and ensure that funds are properly credited to the correct ASAP account. Returned funds that cannot be identified and classified to an ASAP account will be dishonored and returned to the originating depository financial institution (ODFI). The grant recipient should notify the NIST Grants Office and the assigned FPO with the reason for the return provided via email.

It is essential that the grant recipient provide its financial institution with ASAP account information (ALC, Recipient ID and Account ID) to which the return is to be credited. Additional detailed information is accessible at: https://www.fiscal.treasury.gov/asap/.

Records Retention

Q: What records should I retain after closing out my grant?

A: The record retention requirements are set forth in 2 C.F.R. 200.334. In general, records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report. Records include, but are not limited to, the following:

- award package
- financial records
- evidence of program accomplishments
- progress reports
- audit follow-up records
- monitoring records
- written determinations and preapprovals between NIST GMD, NTIA, and the CMC recipient, as well as from the awarding agency
- records supporting all costs charged to the award
- procurement records
- subawards issued by the recipient and all documentation supporting the management and oversight of the subawards
- final closeout letter
- a record of reconciliation
- property disposition records

Q: Are there any record retention exceptions that would require my organization to keep records longer than three years?

A: Yes, for a full list of the exceptions, please refer to 2 CFR § 200.334. For awards that have pending litigation, records must be kept until the final settlement, even if that comes more than three years past the award end date. A written request can be made by the awarding agency or authorized audit officials to hold records beyond three years from the end date.

Appendix

Common Acronyms

Acronym	Term
AOR	Authorized Organization Representative
ASAP	Automated Standard Application for Payments
CMC	Connecting Minority Communities Pilot Program
FAC	Federal Audit Clearinghouse
FFR	Federal Financial Report
FPO	NTIA CMC Federal Program Officer
GO	NIST GMD Grants Officer
GS	NIST GMD Grants Specialist
NIST GMD	The National Institute of Standards and Technology, Grants Management Division
NTIA	National Telecommunications and Information Administration
OICG	Office of Internet Connectivity and Growth under NTIA
PI/PD	Project Investigator/Project Director
SAC	Specific Award Condition
UEI	Unique Entity Identifier
UGA	Unfunded Grant Action

Definitions

Term	Definition
Community Anchor Institutions	Schools, libraries, medical and healthcare providers, public safety entities, public housing authorities, institutes of higher education, and other community support organizations that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by the entire population and local governments.
Consortium	Led by an HBCU, a TCU, or an MSI and includes an MBE or a tax-exempt 501(c)(3) organization. It may contain multiple HBCU, TCUs, and/or MSIs.