INTERNET FOR ALL

Monitoring and Compliance Office Hours

Connecting Minority Communities Pilot Program (CMC)

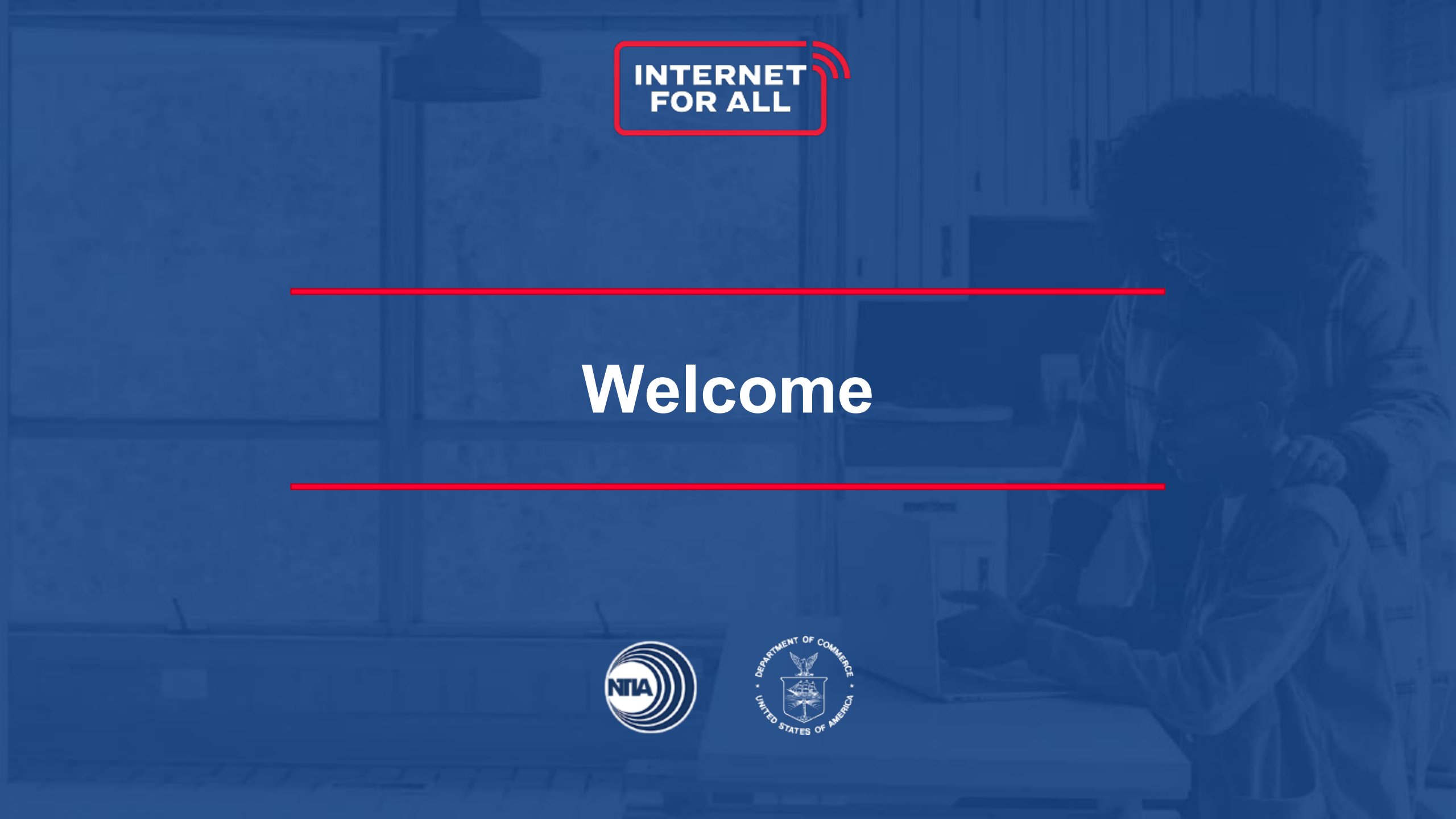
NTIA

DEPARTMENT OF COMMERCE · UNITED STATES OF AMERICA ·

DISCLAIMER

This presentation is for informational purposes only and is intended solely to assist recipients in better understanding the Federal Program and Federal Interest regulations required by National Telecommunication and Information Administration (NTIA). The guidance does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the program's Notice of Funding Opportunity (NOFO).

In all cases, statutory and regulatory mandates, and the requirements set forth in the program's NOFO, shall prevail over any inconsistencies contained in the information presented.


INTERNET
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Welcome
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CMC Updates

CMC Grants ConnectingUS

"It's basically the way of the world now. With everything being on phones and computers now, I think Internet for everyone is very important, especially nowadays."

-- Phashad Williams, 23, Participant in Oklahoma State University Institute of Technology's inaugural fiber technician training class

"The main reason I needed the Internet is to go to school. Obtaining an education is very important – people need to be informed."

– Gabriel Tahy, 33, Recipient of Diné College's free laptop and WiFi hotspot program

"I am learning along with my son, and the teachers, who are motivating us and teaching. I wish there were more programs like this to continue helping those like us and other parents and children as well."

--Maria Alvarez, 38, Student in the University of Houston-Downtown's (UHD) bilingual digital literacy classes

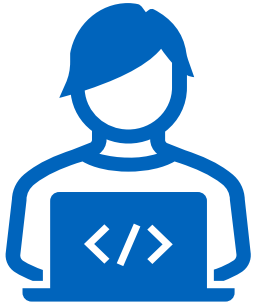
CMC Grants Milestones

9,297

New Broadband Subscriptions

24,538

Devices Distributed to Students and Patrons



15,147

Individuals Trained in Workforce and Digital Skills

66

Broadband Network Upgrades

Compliance and Monitoring

Importance of Monitoring

Monitoring confers many benefits to recipients, including:

- Showcase of project successes
- Strong relationships with FPOs & Grants Specialists
- Knowledge about monitoring for recipients with subrecipients/vendors
- Early identification and mitigation of potential waste, fraud, or abuse
- Grant file organization ahead of audit/closeout
- Determination of tailored Technical Assistance (TA)
- Understanding of process improvements and documentation of lessons learned
- Training in proper grants administration
- Assurance that the project is effectively meeting milestones

Top 3 Elements to Effective Monitoring

There is more to monitoring than compliance and mitigating fraud, waste, and abuse. Here are three key reminders to effective monitoring and successful program implementation.

DOCUMENTATION

- Policies and Processes
- Decisions
- Records Retention

COMMUNICATION

- Federal Program Officer
- NIST Grants Office
- Internal Communication

EDUCATION

- Program Guidelines and Reporting Requirements
- 2 CFR Part 200 Uniform Guidance
- Available Technical Assistance Resources and Trainings

Site Visits and Desk Review Update

Monitoring Activities

Conference Calls

Report Review

Desk Reviews

Site Visits

Ongoing Technical Assistance

What to Expect with a Site Visit

Selection

FPOs notify recipients of site visit and coordinate on a date/time, participants, and required materials.

Preparation

Recipients prepare the requested documentation, notify personnel who will need to attend, and prepare project sites to be visited and (if applicable) tests to be run at the project site(s).

Assessment

FPOs meet with recipients, observe project site(s) and activities and review administrative, financial, and programmatic issues, documents, and any items for redress with the recipient.

Outcome

Site visit findings are documented, and any additional TA needs are identified. FPOs follow-up with recipients and work to resolve any NTIA corrective actions to ensure compliance through the resolution of issues identified.

What to Expect with a Desk Review

Selection

FPOs notify recipients of desk review and coordinate on a date/time, participants, and required materials.

Documentation

Grant recipients complete and compile documentation to submit to FPOs.

Review

FPOs conduct desk reviews with grant recipients, examining errors and omissions and requesting corrections and follow-up.

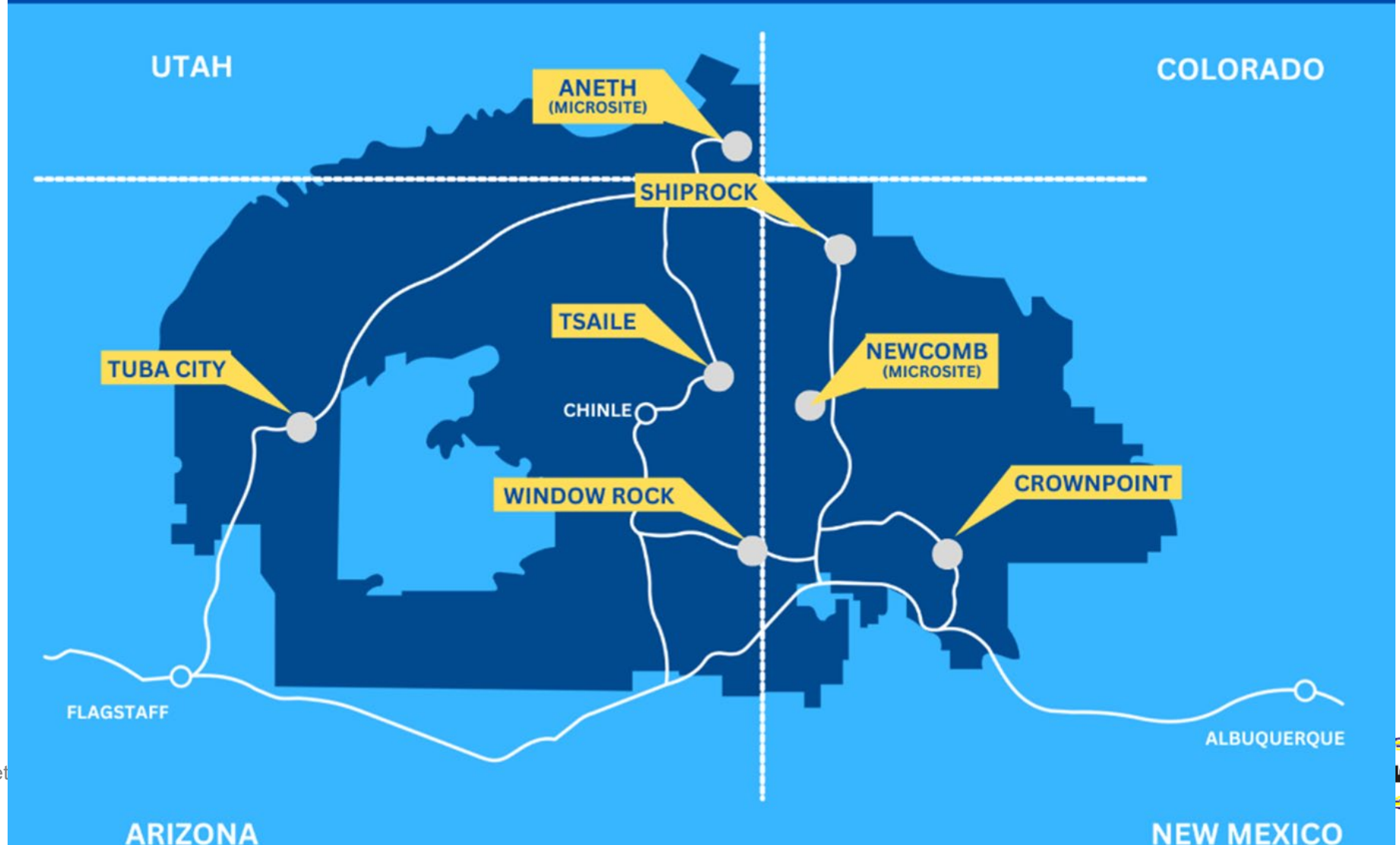
Outcome

Desk review findings are documented and any additional TA needs are identified. FPOs follow-up with recipients and work to resolve any NTIA corrective actions to ensure compliance through the resolution of issues identified.

Site Visit Lessons Learned from FPO Juan Sanchez

Site Visit Minute with Dr. Juan Sanchez, FPO

DINÉ COLLEGE
CAMPUS & MICROSITES



Buffalo Pass Overlook
On Indian Route 13

Award Action Requests (AARs)

Overview of Award Action Requests

Award Action Requests (AARs) = Unfunded Grant Actions (UGAs) = Prior Approvals

- An AAR is the mechanism a recipient uses to propose a change to their award. An AAR submission prompts the Grants Officer (GO) to amend an award, with approval provided through a CD-451 form or a Non-Funded Administrative Change Letter, which documents the approved amendment to the Financial Award (CD-450).
- Department of Commerce (DOC) awards can only be amended, changed or modified by the assigned National Institute of Standards and Technology (NIST) Grants Management Division (GMD) GO
- AARs include, but are not limited to:

No-Cost Extensions

Changes in Scope

Subrecipient Changes

Changes in Key Personnel

Budget Revision

Most Common Types of AARs

Budget Revision

A Budget Revision AAR allows a recipient to amend their approved project budget but does not change the original award amount.

Change in Key Personnel

A Change in Key Personnel AAR allows a change to the recipient's key grant administration personnel specified in the application or award agreement.

Change in Scope

A Change in Scope AAR allows a change or shift in the specific goals, objectives, or project areas approved at the time of the award.

No-Cost Extension

A No-Cost Extension AAR extends a project's period of performance without granting additional funds.

Less common AARs include a Change in Subaward AAR, a Name Change AAR, a Novation AAR, and an Award Transfer AAR. For additional information, please contact your assigned FPO.

AAR Process

Key
Grant Recipient Action
FPO Action
NIST Action

1) **Grant recipient** wants to make a change to their project.

2) **Grant recipient** consults with **FPO on AAR** and FPO provides guidance.

3) **Grant recipient** emails AAR request to UGAM@nist.gov with applicable documentation & required information.

4) NIST GMD GO and FPO review submission for approval.

5) **NIST GMD GO** issues either an:

a) Administrative Change Letter within 12 business days

OR

b) Award Amendment (Form CD-451) within 17 business days*

No-Cost Extension Updates

No-Cost Extension AAR Requirements

Before submitting a No-Cost Extension AAR, grant recipients are required to demonstrate:

They have a plan for the use of the grant funds.

The execution or implementation of the project is underway.

Extenuating circumstances require an extension of time to allow the project to be completed.

Note: Unspent funds are not sufficient justification for a No-Cost Extension.

No-Cost Extension Process

1. • Grant recipient notifies their assigned FPO they desire a No-Cost Extension
2. • Grant recipient submits the required materials to FPO
3. • After preliminary approval from FPO, grant recipient submits to Unfunded Grant Action Mailbox (UGAM)
4. • FPO drafts a No-Cost Extension memo
5. • FPO submits the memo to the Program Director
6. • Program Director finalizes the memo and submits to NTIA Associate Administrator for review
7. • Associate Administrator reviews memo and provides recommendation to program office
8. • NIST conducts final review and formalizes approval/rejection of No-Cost Extension request

Internal Controls and Personnel Changes

Setting the Table for Your Grant to be Successful through Compliance and Monitoring Drawdowns

GAO

What is the Green Book?

Important facts and concepts related to the Green Book and internal control

RELATED TO GAO-14-704G

How does internal control work?

Internal control helps an entity

- Run its operations efficiently and effectively
- Report reliable information about its operations
- Comply with applicable laws and regulations

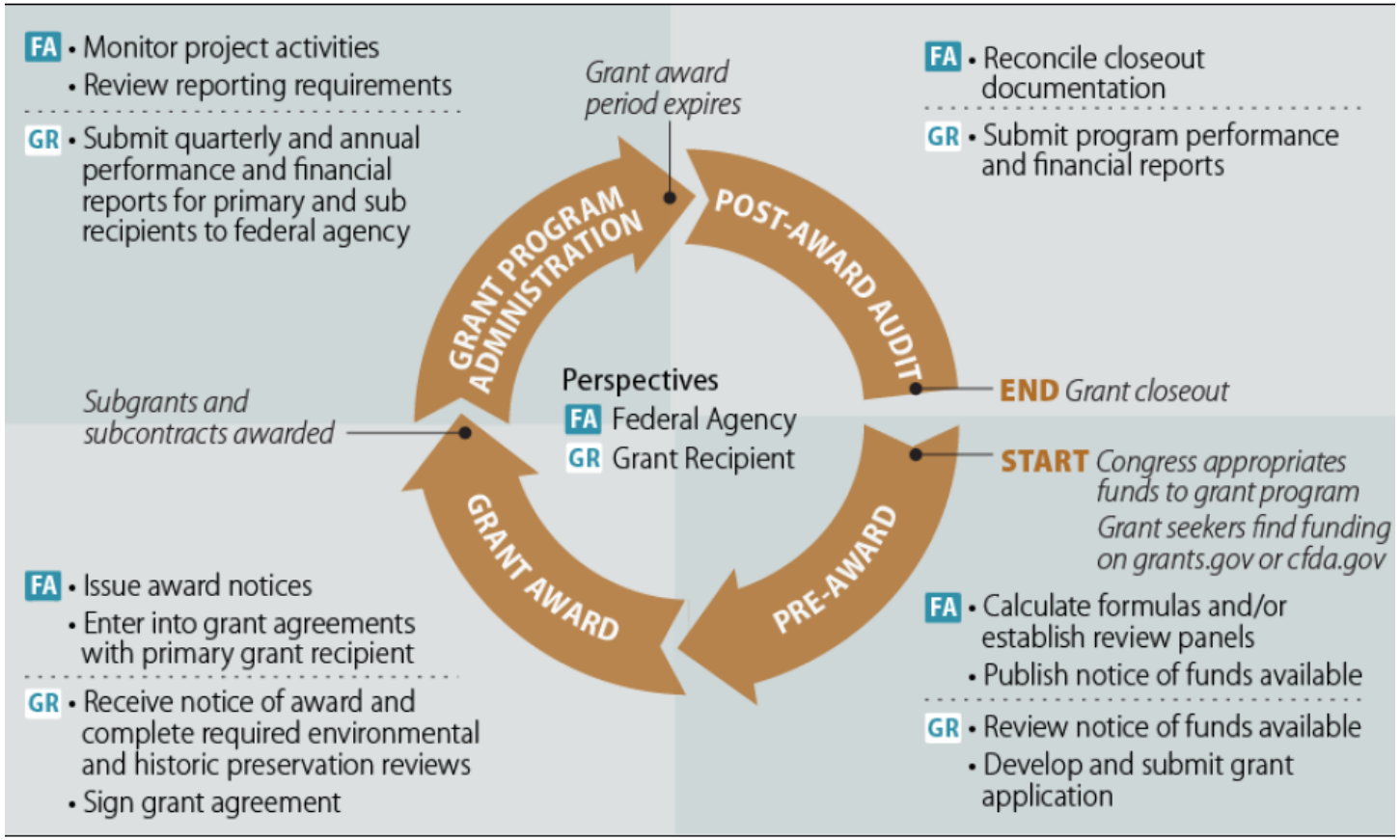
What is internal control?

Internal control is a process that helps an entity achieve its objectives. It is the first line of defense in safeguarding public resources.

Objective identified → Controls designed → Controls in place → Objective achieved

Standards for Internal Control in the Federal Government, known as the Green Book, is the document that sets internal control standards for federal entities.

Figure 1. Life Cycle of a Federal Grant



Source: Congressional Research Service, April 2023.

Internal Controls and Personnel Changes

- Changes in two or more key personnel (such as the Authorized Organizational Representative (AOR)) may suggest a changing management environment, which may enable waste, fraud, and abuse.
- Therefore, for non-construction projects, 2 CFR 200.308(c)(2) requires prior approval for any changes in key personnel specified in the application or Federal Award.
- When a key team member leaves the organization, grant recipients should follow all internal policies about staffing changes, such as:

Reviewing Access to Storage

Removing Access to Documents

Changing Passwords to Folders

Disabling Employee Badges

Notifying Security Teams

Q&A

Reports Due!

As a reminder, the following reports were due at 11:59PM EST on Tuesday, April 30:

- Semi-Annual (Performance) Technical Report
- Federal Financial Report (FFR) or SF-425
- Build America Buy America (BABA) Report (only for recipients with the BABA SAC)

If you have not yet submitted your report(s), please complete the following steps as soon as possible.

1 Notify your assigned FPO

Contact your assigned FPO immediately and inform them of your expected submission date

2 Complete your report(s)

The Excel template must be signed before the report is submitted. If you are unable to sign the Excel template, you may submit a signed PDF version in addition to the Excel version.

3 Submit your report(s)

Email your FFR and Semi-Annual Performance (Technical) Report(s) to greports@nist.gov. Submit your BABA Report to cmc@ntia.gov. Copy your FPO for all reports.

INTERNET FOR ALL

THANK YOU

CMC@ntia.gov

Resources

- Recipient Handbook
- CMC Frequently Asked Questions
- Subrecipient Monitoring Webinar Recording
- Waste, Fraud, and Abuse Webinar Recording
- Monitoring Site Visits & Desk Reviews Webinar Recording
- NIST AAR Webinar Recording
- CMC Device Distribution and Lending Webinar