

# Middle Mile Desk Review Checklist

Version 1.0





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# Checklist

# Checklist

Question Type	Description	Sub-Sections (if applicable)
<b>Introduction</b>	Introductory questions frame the grant recipient's current status, in relation to any prior monitoring activities, administrative barriers, and/or training and technical assistance received (if applicable)	N/A
<b>Administrative</b>	Administrative questions examine the grant recipient's administrative policies and procedures to ensure readiness and capacity to conduct grant-related activities	<ul style="list-style-type: none"><li>• Key Personnel;</li><li>• Remedies &amp; Noncompliance;</li><li>• Record Retention &amp; Access</li></ul>
<b>Financial</b>	Financial questions examine the grant recipient's financial, purchasing, contracting, and procurement policies and procedures to ensure compliance with Middle Mile and other federal regulations and requirements	<ul style="list-style-type: none"><li>• Financial Management;</li><li>• Procurement Standards</li></ul>

# Checklist

Question Type	Description	Sub-Sections (if applicable)
<b>Programmatic General</b>	General programmatic questions examine the grant recipient's grant and project management practices to ensure compliance with program requirements for both the grant recipient and any subrecipients	<ul style="list-style-type: none"><li>• Project Management;</li><li>• Performance and Financial Monitoring &amp; Reporting;</li><li>• Property Standards;</li><li>• Subrecipient Monitoring &amp; Management;</li><li>• Environmental &amp; Historical Preservation;</li><li>• Architecture &amp; Engineering;</li><li>• Construction</li></ul>
<b>Programmatic Middle Mile Deployment</b>	Programmatic questions related to Middle Mile deployment funds	N/A
<b>Conclusion</b>	The conclusion questions capture any pertinent information not captured in the topics above, as well as identify any need for additional technical assistance	N/A



# Introduction

# Checklist Questions

1.If applicable, have all of the grant recipient’s outstanding issues for resolution from past monitoring activities been resolved?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Prior Immediate Action Letters, Performance Improvement Plans (PIPs), and/or Corrective Action Plans (CAPs)</li></ul> <b>FPO Notes:</b>		
<b>Response</b>	<b>Grant Recipient Required Action</b>	<b>FPO Required Action</b>
Yes	No action required.	No action required.
N/A	No action required.	No action required.
No	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete .
2. Does the grant recipient have any active withholding conditions (i.e., SACs) placed on the award that prohibits the grant recipient from drawing down, obligating, and/or expending funds?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>CD-450/CD-451s; GMIS records; Administrative Letters; relevant FPO/Grant Recipient/NIST email correspondence</li></ul> <b>FPO Notes:</b>		
<b>Response</b>	<b>Grant Recipient Required Action</b>	<b>FPO Required Action</b>
No	No action required.	No action required.
Yes	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

3. Does the grant recipient have any active (i.e., unapproved) unfunded grant actions (UGAs)?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>CD-450/CD-451s; GMIS records; Administrative Letters; relevant FPO/Grant Recipient/NIST email correspondence</li></ul> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible. UGA requests must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a UGA is not approved until the Grants Officer issues written approval.	Follow up with grant recipient at least every 30 days until required action is complete.
4. Has the grant recipient submitted all required Performance (Technical) Progress Reports and Federal Financial Reports (FFRs)?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Performance (Technical) Report and FFR submissions and records (e.g., NTIA Grants Portal; GMIS)</li></ul> <i>Note: Grant recipients may request one-time extensions to submit reports. The Grant Specialist is able to approve the request via email. Any additional extensions must be approved by the Grant Officer.</i> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
No	Submit all required Performance (Technical) Progress Reports and Federal Financial Reports (FFRs).	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.



# Checklist Questions

5. Has the grant recipient received any Training and Technical Assistance (TTA) since their last monitoring visit (i.e., site visit, desk review)?

**Reference Document(s):**

- Documentation of prior TTA; relevant FPO/Grant Recipient/NIST email correspondence

*Note: Please outline any TTA received in the FPO notes below.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes – TTA resolved outstanding issues	No action required.	No action required.
Yes –Outstanding issues remain.	Discuss and determine a TTA plan with your FPO.	Connect Grant Recipient with relevant TTA resources and personnel. Follow up with grant recipient at least every 30 days until TTA is complete.



**Administrative**

# Checklist Questions

## 6. Does the grant recipient have written policies, procedures, and/or processes that clearly outline the roles and responsibilities of key administrative personnel?

### Reference Document(s):

- Personnel/Employee Handbook; Memorandum of Understanding/Statement of Work; Organization charts; Resumes

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update existing policies, procedures, and/or processes to more clearly outline all key administrative personnel's roles and responsibilities.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop written policies, procedures, and/or processes that clearly outline the roles and responsibilities of key administrative personnel.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

## 7. Does the grant recipient have documentation (i.e., organization chart) that outlines all key personnel assisting in implementing the Federal award, including their names, titles, roles & responsibilities, and current percentage of Full-Time Equivalent (FTE) and Part-Time Equivalent (PTE) dedicated to the Federal award?

### Reference Document(s):

- Organization chart; Memorandum of Understanding/Contract; Budget Narrative

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial – Incomplete Documentation	Update documentation with the associated missing information.  [Issue identified by FPO] – (e.g., names, titles, roles, responsibilities, and/or % FTE/PTE).	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
Partial – Misalignment with Project Budget	Discuss any misalignment with your FPO and NIST Grants Specialist as soon as possible. If applicable, a request for a budget modification must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a budget revision is not approved until the Grants Officer issues written approval.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop documentation that outlines all current key personnel assisting in implementing the Federal award, including their names, titles, roles and responsibilities, and current percentage of Full-Time Equivalent (FTE) and Part-Time Equivalent (PTE) dedicated to the Federal Award	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

**8. Has the grant recipient’s key personnel changed since the last monitoring engagement (i.e., quarterly conference call) and is there documented prior approval for this change?**

**Reference Document(s):**

- Organizational chart; Administrative Letters (i.e., documented approval of Change in Key Personnel); GMIS; relevant FPO/Grant Recipient/NIST email correspondence

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
No – No changes	No action required.	No action required.
Yes – have documented prior approval	No action required.	No action required.
Yes – do not have prior documented Approval	Discuss any changes with your FPO and NIST Grants Specialist as soon as possible. A request to change Key Personnel must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a change in Key Personnel is not approved until the Grants Officer issues written approval.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

**9. Does the grant recipient have written policies, procedures, and/or processes for tracking compliance (e.g., compliance with specific award conditions (SACs))?**

**Reference Document(s):**

- Written policies, procedures, and/or processes for tracking compliance with grant terms and conditions

Note: Per 2 CFR 200.339, if a non-Federal entity fails to comply with the U.S. Constitution, Federal statutes, regulations or the terms and conditions of a Federal award, the Federal awarding agency or pass-through entity may impose additional conditions, as described in [section 200.208](#). For more details see 2 CFR 200.208, 200.339.

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update existing policies, procedures, and/or processes to more clearly outline tracking compliance (e.g., compliance with specific award conditions (SACs)). [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop written policies, procedures, and/or processes for tracking compliance (e.g., compliance with specific award conditions (SACs)).	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

10. Does the grant recipient have written policies, procedures, or processes to prevent fraud, waste, and abuse in line with the requirements of the NOFO (Section VII.G.1)?		
<p><b>Reference Document(s):</b></p> <ul style="list-style-type: none"><li>Post-Award Risk Assessment; Written policies, procedures, or processes to prevent fraud, waste, and abuse; Copies of materials that demonstrate the grant recipient has established and widely publicized telephone numbers and email addresses for the Eligible Entity’s Office of Inspector General (or comparable entity) or subgrantees’ internal ethics office (or comparable entity)</li></ul> <p>Note: Per 2 CFR 200. Entities must establish procedures to identify and prevent the potential risk of fraud, waste, and abuse .</p> <p><b>FPO Notes:</b></p>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update fraud/waste/abuse policies, procedures, or processes to include all critical areas.  [Issue identified by FPO] – (e.g., established and widely publicized telephone numbers and email addresses for the Eligible Entity’s Office of Inspector General (or comparable entity) or subgrantees’ internal ethics office (or comparable entity))	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written policies, procedures, or processes to prevent fraud, waste, and abuse in line with the requirements of the NOFO (Section IX.G.1).	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

11. Does the grant recipient have a written record retention schedule compliant with the terms of their award?

Reference Document(s):

- Record retention policy

Note: Per 2 CFR 200.334, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of 3 years. Records may be retained in an electronic format.

FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update the record retention schedule/policy to align with the terms of your award.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop a written record retention schedule compliant with the terms of your award.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.



**Financial**

# Checklist Questions

12. Does the grant recipient have written financial management policies, procedures, or processes?		
<p><b>Reference Document(s):</b></p> <ul style="list-style-type: none"><li>Written financial management policies, procedures, or processes</li></ul> <p>Note: Per 2 CFR 200.302, Financial Management, each state must expend and account for the Federal award in accordance with state laws and procedures for expending and accounting for the state’s own funds.</p> <p><b>FPO Notes:</b></p>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update financial management policies, procedures, or processes to include all critical areas.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written financial management policies, procedures, or processes to cover all critical areas.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.



# Checklist Questions

13. Can the grant recipient’s financial system/software generate an itemized report to verify that total Federal funds expended match the expenditures reported in the Performance (Technical) Progress Report and SF-425 for the latest reporting period?

Reference Document(s):

- Name of grant recipient’s financial system (e.g., name of software); Evidence that the grant recipient’s financial system has the capacity to generate an itemized report to verify that total Federal funds expended for latest reporting period (e.g., screenshot; sample reconciliation document)

Note: FPO should verify that Federal funds expended (as shown in Federal funds verification report) correspond to the figures in the most recently submitted Bi-Annual Performance (Technical) Progress Report and SF-425.

Per 2 CFR 200.329, Monitoring & reporting program performance, recipients must submit detailed reports either electronically or in hard copy.

FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required.
No – no report available	Develop, store, and internally disseminate federal funds verification report.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No – verification report does not align with Performance (Technical) Report and/or SF-425	Grant recipients are responsible for promptly notifying their FPO and NIST Grants Specialist of any misalignment or irregularities with reporting.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

**14. Has the grant recipient adopted an accounting system/software compliant with U.S. GAAP (Generally Accepted Accounting Principles) as defined by the AICPA (American Institute of Certified Public Accountants), FASB (Financial Accounting Standards Board), and other applicable regulations?**

**Reference Document(s):**

- Post-Award Risk Assessment; Name of the grant recipient accounting system (e.g., name of software)

*Note: Per 2 CFR 200.302(b) **Financial Management**, financial system must identify accurate, current, and complete disclosure of financial results of each Federal award or program in accordance with reporting requirements set forth in 2 CFR 200.328 and 200.329.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Collect additional information (e.g., consult with accounting department) to confirm the accounting system/software is compliant with GAAP  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Adopt an accounting system/software that is compliant with U.S. GAAP	Document Required Actions in Desk Review Follow-Up Letter.

**15. Does the grant recipient have written payroll processing policies, procedures, or processes?**

**Reference Document(s):**

Follow up with grant recipient at least every 30 days until required action is complete.

- Written payroll processing policies, procedures, or processes

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update payroll processing policies, procedures, or processes to include all critical areas  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written payroll processing policies, procedures, or processes; Provide sample time records.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

**16. Does the grant recipient’s payroll system/software allow you to set up a charge code for the grant or do you maintain a separate tracking system to account for hours/expenditures allocated to the grant that is reconciled against the payroll system?**

**Reference Document(s):**

- Name of the grant recipient payroll system (e.g., name of software); Evidence that the grant recipient’s payroll system has a charge code for the grant OR evidence that the grant recipient maintains a separate tracking system to account for hours/expenditures allocated to the grant that is reconciled against the payroll system (e.g., screenshot of charge codes)

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
No	Develop grant charge codes within existing payroll system OR Develop tracking system to account for hours/expenditures allocated to the grant that is reconciled against the payroll system.	Document Required Actions in Desk Review Follow-Up Letter.

**17. Does the grant recipient have an accounting system/software that automatically tracks receipt and expenditure of program funds, separately for each contract/grant?**

**Reference Document(s):**

- Post-Award Risk Assessment; Name of the grant recipient accounting system (e.g., name of software); Evidence that the grant recipient’s accounting system automatically tracks receipt and expenditure of program funds, separately for each contract (e.g., screenshot of charge codes)

*Note: Recipients that receive awards under programs that prohibit supplanting by law must ensure that federal funds do not supplant funds that have been budgeted for the same purpose through non-federal sources. If FPOs think that supplanting may have occurred, then the recipient will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.*

*For more details see 2 CFR 200.302.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Consult with accounting department to update accounting system/software capabilities to separately track all critical areas and produce sample reports. [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Adopt an accounting system that tracks receipt and expenditure of program funds, separately for each contract/grant	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

18. Does the grant recipient have written policies, procedures, or processes for ASAP drawdowns, which includes minimizing the time elapsed between the drawdown of funds and disbursement of those funds to ensure minimum cash on hand?

Reference Document(s):

- Written policies, procedures, or processes for ASAP drawdowns

FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required.
Partial	Update drawdown policies, procedures, or processes to include all critical areas  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written policies, procedures, or processes for ASAP drawdowns, which include minimizing elapsed time between drawdown and disbursement of funds to minimize cash on hand.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

## 19. Does the grant recipient have written procurement and purchasing policies, procedures, or processes?

**Reference Document(s):**

- Written procurement and purchasing policies, procedures, or processes

*Note: Per 2 CFR 200.318, the non-Federal entity must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this section, for the acquisition of property or services required under a Federal award of subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standard identified in 2 CFR 200.317- 200.318.*

*Additionally, the requirements of the Build America, Buy America Act (Pub. L. 117-58, sections 70901-52) apply to this program. That said, Middle Mile grant recipients may take advantage of applicable BABA waivers, including the Limited Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of Middle Mile Grant Program Awards. For more information, see <https://www.commerce.gov/oam/build-america-buy-america>.*

*Further, per the version of 2 CFR 200.322 (Domestic preferences for procurements) incorporated into the Middle Mile awards, in efforts to strengthen Buy American Preferences, recipients of covered programs are encouraged to use, to the greatest extent practicable, iron and aluminum as well as steel, cement, and other manufactured products produced in the United States in every contract, subcontract, purchase order, or subaward that is chargeable under this award.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action	No action required.
Partial	Update purchasing & procurement policies, procedures, or processes to include all critical areas.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written procurement and purchasing policies, procedures, or processes.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

## 20. Does the grant recipient have sample procurements (e.g., Request for Proposals) and other documentation to show compliance with Federal, state, and/or local procurement policies related to competitive acquisitions?

### Reference Document(s):

- Sample procurement documents and/or templates (e.g., Request for Proposals; Sole Source Contracts; Contract terms and conditions).

Note: Per 2 CFR 200.318(i), General Procurement Standards, non-Federal entity must maintain records sufficient to detail the history of procurement. For more details see 2 CFR 200.318.

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
N/A	No action required	No action required
Yes	No action required	No action required
No – documentation not available	Obtain and store all procurements and related documentation.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No – documentation not compliant	Grant recipients are responsible for promptly notifying their FPO and NIST Grants Specialist of any misalignment or irregularities related to Federal grant funding.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

## 21. Does the grant recipient have written contract management policies, procedures, or processes, which capture the applicable terms and conditions of the Federal awards?

### Reference Document(s):

- Written contract management policies, procedures, or processes

Note: Per 2 CFR 200.318(b), General Procurement Standards, non-Federal entity must have procedures to maintain oversight and to ensure that contractors perform in accordance with the terms, conditions, and specification of their contracts or purchase order.

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
Partial	Update contract management policies, procedures, or processes to include all critical components.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written contract management policies, procedures, or processes.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

22. Does the grant recipient have a list of the contractors funded by the grant, including their role in project execution?		
Reference Document(s): <ul style="list-style-type: none"><li>Bi-Annual Reports; Approved Budget Narrative; List of contractors and related responsibilities; Contracts/Statements of Work</li></ul>		
FPO Notes:		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
Partial	Update the contractor list to include all grant-funded contractors and their role in project execution.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No	Identify storing mechanism and compile complete list of funded contractors.	Document Required Actions in Desk Review Follow-Up Letter.
23. Are the existing contracts in line with the grant recipient’s current project plan and/or budget?		
Reference Document(s):		Follow up with grant recipient at least every 30 days until required action is complete.
<ul style="list-style-type: none"><li>Approved Budget Narrative; List of contractors funded by the grant; Executed contracts and statements of work</li></ul>		
FPO Notes:		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Discuss any changes with your FPO and NIST Grants Specialist as soon as possible. A request for a revision to the project budget or scope must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a modification is not approved until the Grants Officer issues written approval.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.



# **Programmatic General**



# Checklist Questions

24. Does the grant recipient have a written project management plan to capture the overall progress of the project?

<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Written project management plan</li></ul> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update project management plan to include all critical components and meaningful milestones.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and disseminate a written project management plan that captures the overall project progress.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

25. Does the grant recipient have written policies, procedures, and/or processes to ensure timely and accurate submission of project performance and financial reports?

<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Written report submission policies, procedures, or processes</li></ul> <i>Note: Per 2 CFR 200.329(a), <b>Monitoring by non- Federal entity</b>, the non-federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity. Per 2 CFR 200.329(b), <b>Reporting program performance</b>, the Federal awarding agency must use OMB-approved common information collections, as applicable, when providing financial and performance reporting information. For more details, please see 2 CFR 200.328, 200.329.</i> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update project management plan to include all critical components.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop written policies, procedures, and/or processes that clearly outline procedures related to timely and accurate submission of project performance and financial reports.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

26. Does the grant recipient have written property management policies, procedures, or processes (e.g., asset tagging, asset management)?

**Reference Document(s):**

- Written property management policies, procedures, or processes; SF-428; SF-429

*Note: Tangible personal property means property of any kind that has physical existence and includes equipment and supplies. Property may be provided by NTIA or acquired by the recipient with award funds. Federally-owned property consists of items that were furnished by the Federal government. Equipment includes tangible personal property (including information technology systems) having a useful life of more than one year and per-unit acquisition costs **that equal to or exceed \$5,000**. A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life.*

*Per 2 CFR 200.310-200.316, **Property Standards**, each non-Federal entity must comply with standards involving insurance coverage, real property, federally owned and exempt property, equipment, supplies, intangible property, and property trust relationships.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update property management policies, procedures, or processes to include all critical components.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written property management policies, procedures, or processes.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

## 27. Can the grant recipient provide an inventory of all equipment purchased with grant funds?

**Reference Document(s):**

- Written property management policies, procedures, or processes; SF-428; SF-429; Relevant UCC filings (i.e., UCC-1 forms ); Inventory list (including tracking of whether grant-funded materials (i.e., iron, steel, manufactured products, and construction materials) are sourced domestically).

• **Additional Guiding Question(s):**

Do the available documents make clear that all procurement requirements (Build America, Buy America Act (Pub. L. 117 -58, sections 70901-52), Equipment covered in Section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608)) have been met?

*Note: Tangible personal property means property of any kind that has physical existence and includes equipment and supplies. Property may be provided by NTIA or acquired by the recipient with award funds. Federally-owned property consists of items that were furnished by the Federal government. Equipment includes tangible personal property (including information technology systems) having a useful life of more than one year and per-unit acquisition costs that **equal to or exceed \$5,000**. A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life.*

*Under 2 CFR 200.313(d), **Management requirements**, inventory listing must be maintained whether acquired in whole or in part of a federal award. List must include description of property, serial number, source of funding for the property, acquisition date, cost of property, location, use, condition, and any disposition data. For more details see 2 CFR 200.313.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update the inventory list to include all equipment purchased with grant funds, including identifying whether the materials were sourced domestically.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Identify a storing mechanism and compile complete list of equipment purchased with grant funds, including whether the materials were sourced domestically.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

## 28. Does the grant recipient have written subrecipient management policies, procedures, or processes, if applicable?

### Reference Document(s):

- Subrecipient management policies, procedures, or processes

*Note: Per 2 CFR 200 Subpart D, **Subrecipient Monitoring & Management**, policies should address subrecipient and contractor determinations as well as requirements for pass through entities. For more details see 2 CFR 200.331-333.*

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
Partial	Update subrecipient management policies, procedures, or processes to include all critical components. [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written subrecipient management policies, procedures, or processes.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

## 29. Does the grant recipient have a list of all subrecipients, including their role and responsibilities in project execution, if applicable?

### Reference Document(s):

- Bi-Annual Reports; Approved Budget Narrative; List of subrecipients and related responsibilities; Subaward agreements

*Note: Per 2 CFR 200.332(a), **Requirements for pass through entities**, every subaward must be clearly identified to the subrecipient as subaward and include federal award identification, subrecipient identifier, FAIN, award date, award description, Federal award agency, pass through entity, and contact information for awarding official of the Pass-Through entity, among other information. For more details see 2 CFR 200.332.*

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Update the subrecipient list to include all subrecipients and their role in project execution. [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No	Identify storing mechanism for all contract documents and compile documentation.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
Not Applicable – (No Subrecipients)	No action required	No action required

# Checklist Questions

## 30. Are the grant recipient's existing sub-awards in line with their current project plan and budget, if applicable?

### Reference Document(s):

- Approved Budget Narrative; List of subrecipients funded by the grant; Executed subawards and statements of work

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Discuss any changes with your FPO and NIST Grants Specialist as soon as possible. A request for a revision to the project budget or scope must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a modification is not approved until the Grants Officer issues written approval.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

## 31. Does the grant recipient have a written subrecipient risk assessment and monitoring plan, if applicable?

### Reference Document(s):

- Subrecipient monitoring plan; List of subrecipients; Documentation/artifacts from subrecipient monitoring visits

*Note: See 2 CFR § 200.332 for details of the pass-through entity (i.e., grant recipient), which includes an evaluation of each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring; and the associated monitoring.*

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Complete a subrecipient risk assessment and subrecipient monitoring plan to include all critical components.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written subrecipient risk assessment and written subrecipient monitoring plan.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
Not Applicable – (No Subrecipients)	No action required	No action required

# Checklist Questions

32. If applicable, is the Environmental Assessment proceeding according to the timeline outlined in grant recipient's project plan?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"> <li>Application Documents, Performance (Technical) Progress Reports, Grant Recipient Outreach</li> </ul>		
<b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Provide FPO with update on the expected timeline for the Environmental Assessment	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
Not applicable	No action required	No action required
33. Are there any developments or changes in the grant recipient's project scope that will require additional environmental or historic preservation review?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"> <li>Application Documents, Performance (Technical) Progress Reports, Specific Award Conditions</li> </ul> <i>Note: Per 2 CFR 200.308, Revision of budget and program plans and 2 CFR 200.407, Prior written approval, recipient must obtain written approval for programmatic change requests. For more detail see 2 CFR 200.308, 2 CFR 200.407.</i>		
<b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
No	No action required	No action required
Yes – Identified with UGAs pending	Monitor communications from Grants Officer and FPO to facilitate processing of UGA request	Follow up with grant recipient at least every 30 business days until required action is complete.
Yes – Identified with no UGAs pending	Request UGAs for approval for any budget modifications, project scope changes, or other requests as necessary	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete

# Checklist Questions

34. If applicable, does the grant recipient have experienced staff capable of completing required NEPA (National Environmental Policy Act) and Section 106 coordination, permitting, monitoring and compliance activities necessary to complete infrastructure deployment

OR

Has the grant recipient contracted, teamed, or partnered with a firm having the required NEPA, Section 106, and environmental management capabilities?

Reference Document(s):

- Resumes of staff demonstrating capabilities, Organization chart, Grant recipient outreach

FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Provide FPO with update on the expected timeline for hiring or contracting the resources necessary to meet NEPA requirements	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
Not Applicable	No action required	No action required

35. If applicable, does the grant recipient have all records required to demonstrate compliance with permit and/or environmental review requirements?

Reference Documents:

- Available Project Documents, Environmental Assessment, Grant recipient outreach

Note: Per the **National Environmental Policy Act**, the **Council on Environmental Quality**, and 40 CFR Parts 1500-1508, it is a requirement that an environmental analysis be completed for all major Federal actions to determine whether they have significant impacts on the environment.

FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Provide a list of outstanding permits by regulatory authority with status and immediate next steps to the FPO	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
Not applicable	No action required	No action required

# Checklist Questions

**36. If applicable, has the grant recipient acquired the appropriate cultural resources monitor (or other type of monitor) for construction?**

**Reference Document(s):**

- Environmental Assessment, Performance (Technical) Progress Reports, CD-450s

*Note: **The National Historic Preservation Act**, and **the Advisory Council on Historic Preservation**, and 36 CFR Part 800 require non-Federal entities to take into account the effects of their undertakings on historic properties, and when appropriated, provide the ACHP with reasonable opportunity to comment. Non-Federal entities may also be requested to assist DOC in consulting with State or Tribal Historic Preservation Officers, ACHPS, or other interested parties. Until the appropriate consultations or documents are completed, or if any other additional information is required during the period of performance, funds can be withheld. Non-Federal entities are required to assist in assuring compliance of Archaeological and Historic Preservation Act of 1974, Executive Order 13006, and Executive Order 13007.*

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Provide FPO with a list of cultural resources under consideration for hire or contract to meet project needs.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete
Not applicable	No action required	No action required

**37. If applicable, has an environmental regulatory agency conducted an inspection of the project during or after construction that resulted in no required actions?**

**Reference Document(s):**

- Environmental Assessment, Grant recipient outreach

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Provide FPO with list of outstanding inspection findings and timeline for resolution.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
Not applicable	No action required	No action required



# Checklist Questions

## 38. Does the grant recipient have an architecture and engineering (A&E) work plan?

### Reference Document(s):

- Resume outlining A&E experience for responsible party(ies)

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
Partial	Update A&E work plan to include all critical components. [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No	Provide FPO with A&E work plan that includes all critical components	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

## 39. Does the party responsible for Architecture & Engineering (A&E) meet the requirements for fulfilling this role?

### Reference Document(s):

- Resumes / Curriculum Vitae of staff demonstrating capabilities, Grant recipient outreach

### FPO Notes:

Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

40. Has the grant recipient secured all of the appropriate and necessary permits and/or rights-of-way?		
Reference Document(s): <ul style="list-style-type: none"><li>Record of permits and/or rights-of way</li></ul>		
FPO Notes:		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Secure all appropriate and necessary permits and/or rights-of-way.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
41. Does the grant recipient have a written process for collecting and recording network build data and tracking as-builts (if applicable)?		
Reference Document(s): <ul style="list-style-type: none"><li>Written process for collecting and recording network build data</li></ul>		
FPO Notes:		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
Partial	Update process for collecting and recording network build data to include all critical areas.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written process for collecting and recording network build data to cover all critical areas.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

<b>42. Does the party responsible for construction meet the requirements for fulfilling this role?</b>		
<b>Reference Document(s):</b> <ul style="list-style-type: none"> <li>Resumes / Curriculum Vitae of staff demonstrating capabilities, Grant recipient outreach</li> </ul>		
<b>FPO Notes:</b>		
<b>Response</b>	<b>Grant Recipient Required Action</b>	<b>FPO Required Action</b>
Yes	No action required	No action required
No	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
<b>43. Does the party responsible for construction have mobilization/demobilization plans for construction sites?</b>		
<b>Reference Document(s):</b> <ul style="list-style-type: none"> <li>Mobilization/demobilization plans for construction sites</li> </ul>		
<b>FPO Notes:</b>		
<b>Response</b>	<b>Grant Recipient Required Action</b>	<b>FPO Required Action</b>
Yes	No action required	No action required
Partial	Update mobilization/demobilization plans for construction sites to include all critical areas.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written mobilization/demobilization plans for construction sites to cover all critical areas.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

44. Does the party responsible for construction have work-stop and site safety plans?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Work-Stop and Site Safety Plans</li></ul> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
Partial	Update work-stop and site safety plans to include all critical areas.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No	Develop and internally disseminate written work-stop and site safety plans to cover all critical areas.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.



# **Programmatic Deployment**

# Checklist Questions

45. Is the grant recipient compliant with BABA, specifically, the terms of the MMG BABA waiver?		
Reference Documents(s): <a href="#">Middle Mile BABA Waiver</a>		
FPO Notes:		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
No	Discuss any inconsistencies with your FPO and NIST Grants Specialist as soon as possible.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action complete.
46. Is the grant recipient’s actual project-related activities aligned with the activities outlined in their application documents?		
Reference Documents(s): <ul style="list-style-type: none"><li>Application Project Narrative; Project Budget; Most Recent Performance (Technical) Progress Report; Project Plan</li></ul>		
FPO Notes:		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required.	No action required.
Partial	Work with FPO to identify a solution to resolving any challenges to managing and/or executing planning activities. [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
No	Discuss any changes with your FPO and NIST Grants Specialist as soon as possible. A request for a revision to the project budget or scope must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a modification is not approved until the Grants Officer issues written approval.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

<b>47. Does the grant recipient have a tracking system to report as-builts, network build, and network monitoring and controls (i.e., Network Operations Centers (fiber miles deployed, towers built and/or retrofitted, etc.)) accurately and in a timely fashion?</b>		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Quarterly Conference Calls, Bi-Annual Performance (Technical) Progress Reports, Bi-Annual Financial Reports (SF-425s)</li></ul>		
<b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No	Identify and implement a system to accurately monitor network build progress across all project sites.	Document Required Actions in Desk Review Follow-Up Letter. Follow up with grant recipient at least every 30 days until required action is complete.
<b>48. Is the grant recipient on track to meet its buildout benchmarks established as a condition of the middle mile grant (per NOFO, Section III.D)?</b>		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Quarterly Conference Calls, Bi-Annual Performance (Technical) Progress Reports, Bi-Annual Financial Reports (SF-425s)</li></ul>		
<b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
Yes	No action required	No action required
No – Recipient expects project to deviate significantly (greater than 10%) from provided baselines in the future	Communicate key project risks and expected future delays to FPO	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
No – Recipient expects project will deviate from provided baselines, but not significantly (i.e., deviation will be less than 10%)	Recipient to prepare explanation for the cause of the deviation for review by FPO within 30 business days.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.

# Checklist Questions

49. Upon reviewing the latest Performance (Technical) Progress Report, does the grant recipient have any outstanding issues that require additional further discussion of resolution?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>• Most Recent Performance (Technical) Progress Report</li></ul> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Partial	Work with FPO to identify a solution to resolving any challenges to managing and/or executing planning activities.  [Issue identified by FPO]	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
Yes	Discuss any changes with your FPO and NIST Grants Specialist as soon as possible. A request for a revision to the project budget or scope must be submitted via email to the Unfunded Grant Action Mailbox ( <a href="mailto:UGAM@nist.gov">UGAM@nist.gov</a> ), or as designated in the Specific Award Conditions. The request for a modification is not approved until the Grants Officer issues written approval.	Document Required Actions in Desk Review Follow-Up Letter.  Follow up with grant recipient at least every 30 days until required action is complete.
Not Applicable (No report submitted yet)	No action required.	No action required.



# Checklist Questions

## 50. Are there any changes to the terms of the grant recipient’s Letter of Credit?

**Reference Document(s):**

- Most recent Letter of Credit

**FPO Notes:**

See Section III.B.1.b of the Middle Mile NOFO for additional information on the Letter of Credit.

Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes – Not yet submitted	Discuss any changes with your FPO and NIST Grants Specialist as soon as possible. Work with FPO to identify a solution to resolving any challenges to submitting the new or renewed Letter of Credit.  [Issue identified by FPO]	Document required actions in the Desk Review Follow -Up Letter.  Follow up with grant recipient at least every 30 business days until required action is complete.
Yes - Submitted	No action required.	No action required.

## 51. Placeholder to additional Deployment Questions (see comment)

**Reference Document(s):**

- TBD

**Additional Guiding Question(s):**

- TBD

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
Yes	TBD	TBD
Partial	TBD	TBD
No	TBD	TBD



# Conclusion

# Checklist Questions

**52. Does the grant recipient have any additional administrative issues not addressed during this desk review?**

**Reference Document(s):**

- Relevant FPO/Grant Recipient/NIST email correspondence

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Follow up with grant recipient at least every 30 business days until required action is complete.

**53. Does the grant recipient have any additional financial issues not addressed during this desk review?**

**Reference Document(s):**

- Relevant FPO/Grant Recipient/NIST email correspondence

**FPO Notes:**

Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Follow up with grant recipient at least every 30 business days until required action is complete.

# Checklist Questions

54. Does the grant recipient have any additional programmatic issues not addressed during this desk review?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Relevant FPO/Grant Recipient/NIST email correspondence</li></ul> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes	Discuss and determine a plan for resolving any outstanding issues with your FPO and NIST Grants Specialist as soon as possible.	Follow up with grant recipient at least every 30 business days until required action is complete.
55. At this time, is the grant recipient in need of any Training and Technical Assistance (TTA)?		
<b>Reference Document(s):</b> <ul style="list-style-type: none"><li>Relevant FPO/Grant Recipient/NIST email correspondence; Site Visit Checklist FPO Notes</li></ul> <b>FPO Notes:</b>		
Response	Grant Recipient Required Action	FPO Required Action
No	No action required.	No action required.
Yes – FPO recommends	Discuss and determine a TTA plan with your FPO.	Connect Grant Recipient with relevant TTA resources and personnel. Follow up with grant recipient at least every 30 business days until TTA is complete.



# Document List

# Administrative Documents

	Requested Document(s)	Document Name(s)	Notes
1	Written policies, procedures, and/or processes that clearly outline the roles and responsibilities of Key Personnel (e.g., Personnel/Employee Handbook, Organizational Charts, Resumes of Key Personnel; Memorandum of Understanding/Statement of Work)		<b>Included:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Previously Provided  <b>Comments, if applicable:</b>
2	Documentation that outlines all Key Personnel assisting in implementing the Middle Mile award, including their names, titles, roles & responsibilities, and current percentage of Full-Time Equivalent (FTE) and Part-Time Equivalent (PTE) dedicated to the Federal award (e.g., Organizational Chart; Memorandum of Understanding/Statement of Work)		<b>Included:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Previously Provided  <b>Comments, if applicable:</b>
3	Written policies, procedures, and/or processes for tracking compliance with grant terms and conditions (e.g., compliance with specific award conditions (SACs))		<b>Included:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Previously Provided  <b>Comments, if applicable:</b>
4	Written policies, procedures, or processes to prevent fraud, waste, and abuse (e.g., copies of materials that demonstrate the grant recipient has established and widely publicized telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program; evidence of internal controls and separation of duties (e.g., two-step approver processes) (see Middle Mile NOFO, Section IX.G.1 )		<b>Included:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Previously Provided  <b>Comments, if applicable:</b>
5	Written record retention schedule (see 2 CFR 200.334)		<b>Included:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Previously Provided  <b>Comments, if applicable:</b>

# Financial Documents

Requested Document(s)
<ul style="list-style-type: none"> <li>Written financial management policies, procedures, or processes</li> </ul>
<ul style="list-style-type: none"> <li>Name of grant recipient financial system; Evidence that the grant recipient's financial system has the capacity to generate an itemized report to verify that total Federal funds expended for latest reporting period (e.g., screenshot; sample reconciliation document)</li> </ul>
<ul style="list-style-type: none"> <li>Name of the grant recipient accounting system (e.g., name of software)</li> </ul>
<ul style="list-style-type: none"> <li>Evidence that the grant recipient's accounting system automatically tracks receipt and expenditure of program funds, separately for each contract (e.g., screenshot of charge codes)</li> </ul>
<ul style="list-style-type: none"> <li>Written payroll processing policies, procedures, or processes</li> </ul>
<ul style="list-style-type: none"> <li>Name of the grant recipient payroll system (e.g., name of software)</li> </ul>
<ul style="list-style-type: none"> <li>Evidence that the grant recipient's payroll system has a charge code for the grant OR evidence that the grant recipient maintains a separate tracking system to account for hours/expenditures allocated to the grant that is reconciled against the payroll system (e.g., screenshot of charge codes)</li> </ul>
<ul style="list-style-type: none"> <li>Written policies, procedures, or processes for ASAP drawdowns</li> </ul>
<ul style="list-style-type: none"> <li>Written procurement and purchasing policies, procedures, or processes</li> </ul>
<ul style="list-style-type: none"> <li>Sample procurement documents and/or templates (e.g., Request for Proposals; Sole Source Contracts; Contract terms and conditions)</li> </ul>
<ul style="list-style-type: none"> <li>Written contract management policies, procedures, or processes</li> </ul>
<ul style="list-style-type: none"> <li>List of contractors funded by the grant, including their roles in executing the grant</li> </ul> <p>(Please note that the executed contract documents, including statements of work, executed change orders, and paid contractor invoices should be readily available for review, on request)</p>

# Programmatic Documents

Requested Document(s)
<ul style="list-style-type: none"><li>Written project management plan</li></ul>
<ul style="list-style-type: none"><li>Written policies, procedures, and/or processes to ensure timely and accurate submission of project performance and financial reports</li></ul>
<ul style="list-style-type: none"><li>Written property management policies, procedures, or processes</li></ul>
<ul style="list-style-type: none"><li>List of inventory of all equipment purchased with grant funds</li></ul>
<ul style="list-style-type: none"><li>Written subrecipient management policies, procedures, or processes</li></ul>
<ul style="list-style-type: none"><li>List of subrecipients funded by the grant, including their roles in executing the grant; subaward agreements</li></ul>
(Please note that the executed subaward documents, including statements of work, executed change orders, and paid subrecipient invoices should be readily available for review, on request)
<ul style="list-style-type: none"><li>Written subrecipient risk assessment and monitoring plan; documentation/artifacts from subrecipient monitoring visits</li></ul>





**Thank you**