



Bridges to Career Opportunities Compliance Overview

Social Innovation Fund

December 16, 2015

Call in: 866-740-1260 Code: 4559883

House Keeping

- ▶ This webinar is being recorded.
- ▶ Copies of the slides and the recording will be available on the Google site (tinyurl.com/liscfoc) within two weeks.
- ▶ We will take questions at the end. Please write in questions into the chat box.
- ▶ Please send any unanswered questions to your local program officer.

Agenda

- ▶ Timeline for the BCO grant
- ▶ Budget Directions
- ▶ Procurement
- ▶ Indirect Cost Rate
- ▶ Criminal Background Check Requirements

Timeline - Compliance

▶ Webinars

- ▶ Timesheet Webinar - January 13, 2016
- ▶ Compliance Launch Webinar - January 19, 2016

▶ Submissions to Your Local Program Officer

- ▶ Current finance manual, procurement policy and HR policy manual - December 21, 2015
- ▶ Most recent internal financial if the fiscal year end date of your last audit was more than nine months ago - December 21, 2015
- ▶ All criminal background checks - January 22, 2016

▶ Online Trainings

- ▶ Criminal History Checks - Due January 22, 2016

Two people from each organization must complete. This must be redone if the last review was more than a year ago

Budget Directions

- ▶ Allowable Costs
 - ▶ Direct salaries and fringe
 - ▶ Travel
 - ▶ ETO costs and costs for credit pulls
 - ▶ Consultants - to be hired
 - ▶ Program supplies
 - ▶ Participant incentives
 - ▶ Direct program operating costs
 - ▶ Indirect costs through an approved rate or the *de minimus* rate of 10%

Budget Directions

- ▶ Not allowable
 - ▶ Purchase of equipment with a unit cost of more than \$5,000 even if grant only pays for a portion
 - ▶ Depreciation
 - ▶ General allocated salary costs
 - ▶ Miscellaneous costs
 - ▶ Costs or match costs related to other federal programs including Americorps
 - ▶ In-kind match
 - ▶ Pre-identified consultants if there is no competitive selection documentation on file (more in a later slide)

2 CFR Part 200

Procurement Standards

1. Code of Conduct
2. Acquisition Planning
3. Procurement Instruments (Type of Contract)
4. Solicitations for Goods and Services (Competition and Methods)
5. Cost and Price Analysis and Other Selection Criteria
6. Monitoring
7. Procurement Records

Procurement Methods (Types of Solicitation)

- ▶ Sub-grantees must use the following methods of procurement, for each instance of procurement:
 - ❖ Procurement by Micro-Purchases (up to \$3,000)
 - ❖ Procurement by Small Purchase Procedures (\$3,001-\$100,000)
 - ❖ Procurement by Competitive Proposals (\$100,001 and up)
 - ❖ Procurement by Sealed Bids - Construction

Procurement Documentation

- ▶ Subgrantees must maintain procurement records in connection with every procurement action.
- ▶ Solicitation, election and actual purchase:
 - ▶ Copies of solicitation documents
 - ▶ Names and dates of contractors contacted by phone
 - ▶ Copies of letters, e-mails and faxes soliciting price or rate quotations
 - ▶ Trip reports identifying contractors contacted in person
 - ▶ Copies of price or rate quotations received, including telephone quote confirmations
 - ▶ Notification to the successful contractor
 - ▶ Purchase documents, such as invoices, bills of lading and canceled checks
 - ▶ Copies of the check on www.SAM.gov

Procurement Tips

- ▶ Ensure that your internal policy follows 2 CFR 200
- ▶ Follow your internal policy
- ▶ Procurement actions for this grant must have started no earlier than the RFP release date. No pre-existing consultants will be accepted.
- ▶ Maintain all documentation related to procurement action

Indirect Costs

You may charge indirect costs in one of the following ways:

1. Through a Negotiated Indirect Cost Rate Agreement (NICRA) that has been approved by a federal agency
2. Using a *de minimus* rate of 10% of modified total direct costs
3. By charging indirect costs directly to the grant as long as these costs are
 1. Included in your approved budget
 2. Applied consistently across all federal awards
 3. Are supported with the appropriate back-up documentation (timesheets, background checks, etc.)

Indirect Cost Rate

- ▶ If you have an indirect cost rate from the federal government, you must use that rate not the *de minimus* rate.
- ▶ Groups that have *never* received a negotiated rate are eligible to elect the *de minimus* rate.
- ▶ Administrative costs, comprised of salaries for administrative or clerical staff, are typically charged as indirect costs especially when they support multiple projects or awards. Direct charging of these costs may be appropriate only if all of the following are met
 - ▶ Their services are integral to a project or activity
 - ▶ Individuals can be specifically identified with project or activity
 - ▶ The costs are not also recovered as indirect costs

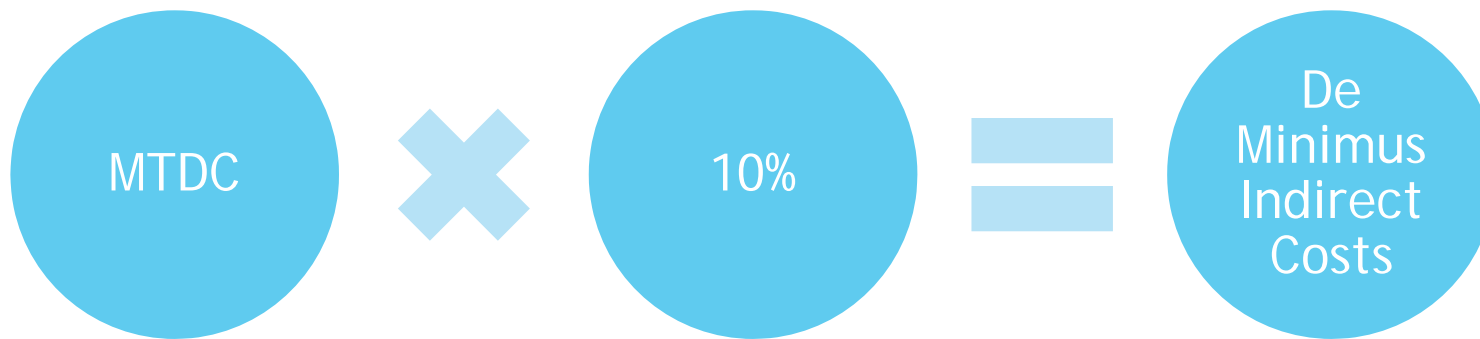
De Minimus Cost Rate

- ▶ See 2 CFR 200.414 for more information
- ▶ De minimus is
 - ▶ Accepted by LISC without any review of actual costs
 - ▶ Must be used consistently across all federal awards
- ▶ De minimus is calculated as 10% of total Modified Total Direct Costs (MTDC)
- ▶ MTDC includes
 - ▶ Salaries & Wages
 - ▶ Fringe Benefits
 - ▶ Materials and Supplies
 - ▶ Services
 - ▶ Travel

De Minimus Cost Rate

- ▶ MTDC does not include
 - ▶ Equipment
 - ▶ Charges for patient care
 - ▶ Tuition remission
 - ▶ Rental costs
 - ▶ Scholarships, and fellowships
 - ▶ Participant support costs

How to calculate the De Minimus Rate



Background Checks

Prior to starting work:

1. Consent Form & Copy of Photo ID
2. NSOPR check must be **completed**
3. State Criminal Background Check must be **initiated**
4. FBI check must be **initiated** (if required)

****For all staff and direct-service consultants charged to Federal, non-Federal or Local Match****

**** Please complete the online webinar at the CNCS website****

Questions?

