# Nebraska Council on Developmental Disabilities

### Subaward User Manual



# Table of Contents

Structure and Use of this Manual Introduction
Reporting Requirements
Required Reports: Program, Key Performance Indicators, Expenditure
Quarterly Program Report
Final Program Report
Demographics and Key Performance Indicators
Satisfaction Survey
Entering Program Reports and Key Performance Indicators in DD Suite
Expenditure Report
Entering Expenditure Reports in DD Suite
Subaward Monitoring
Administrative Procedures
Publications / Copyright
Subaward Closeout
Termination and Suspension
Personnel Policies
Financial Management
<u>Audits</u>
Appendix A – <u>Key Performance Indicators</u>
Avoiding Duplication of Individuals
Appendix B – <u>Sample Satisfaction Survey</u>
Appendix C – <u>Subaward Monitoring</u>
Appendix D – Frequently Asked Questions
Project Goals
No-Cost Extensions
Demographics and Key Performance Indicators

Satisfaction Survey

Subaward Monitoring

**Expenditures** 

### Structure and Use of this Manual

Outlined in this manual are the reporting requirements and administrative guidelines for projects that have been awarded funding by the Nebraska Council on Developmental Disabilities (Council), a division of the Nebraska Department of Health and Human Services. These requirements and guidelines are based on Federal and State legislation, regulations, and policies. The Addendum A – DHHS General Terms in the signed subaward and the Program Specific Requirements in the Request for Applications will govern the administration of Council-funded projects.

### Things to Remember as You Read this Manual

- Correspondence to the Council office should include your agency or organization name, subaward number (found in the top right corner of the signed subaward that was emailed to you, ending with Y3), and project title.
- The Nebraska Department of Health and Human Services requires federal documentation be used to administer subaward projects (see <u>Financial Management</u>).
- This manual is a living document. Updates and corrections will be made as needed.
- If you have questions, contact:

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or
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### Introduction

Administration of the Nebraska Council on Developmental Disabilities (Council) subaward projects is the responsibility of the Nebraska Department of Health and Human Services (Department) as the designated State Administering Agency. Within the Department, Financial Services, which handles fiscal accounting and financial transactions, and Procurement, which handles the subaward agreements, provide support for the subaward projects. Subaward management activities for the Council are the responsibility of the Council Program Specialist.

All applicable state policies, as well as other policies developed by the Council, are in compliance with current Health and Human Services regulations. Council staff have developed this Subaward User Manual for use by subaward recipients (subrecipients). The manual identifies specific procedures to be followed by the subrecipient. Policies and procedures are developed to assure proper and efficient administration of funds awarded to subrecipients.

### Reporting Requirements

Subrecipients will use DD Suite to submit required reporting and documentation as indicated in the table below. Specific report due dates have been added to your Project and Application in DD Suite. It is important to submit all reports by these dates. If you know your report will be unavoidably late, contact the Council Program Specialist to negotiate a date for submittal.

Reports	Due
First Quarter  • Quarterly Program Report and Key Performance Indicators data  • Expenditure Report and source documentation	15th of the month following the project's 1st quarter
Second Quarter  • Quarterly Program Report and Key Performance Indicators data  • Expenditure Report and source documentation	15th of the month following the project's 2nd quarter
Third Quarter  • Quarterly Program Report and Key Performance Indicators data  • Expenditure Report and source documentation	15th of the month following the project's 3rd quarter
Fourth Quarter  • Quarterly Program Report and Key Performance Indicators data	15th of the month following the project's 4 <sup>th</sup> quarter
Closing Reports  • Final Program Report and Key Performance Indicators data  • Final Expenditure Report and source documentation	30 days after the end of the subaward

### Required Reports: Program, Key Performance Indicators, Expenditure

All subaward reports are submitted using DD Suite. The Council Program Specialist is required to monitor project progress and expenditures. This is completed through reviews of quarterly Program and Expenditure reports. Once reviewed, you will receive an email through DD Suite alerting you that either the report was accepted or that modifications are required before being accepted. If modifications are requested, you will log into DD Suite and open the report where modifications are required. Details of what needs to be modified will noted in the specific section. Once modifications are made, you will submit the report for further review.

Occasionally a subrecipient encounters barriers that cause project activities to be delayed. If you should run into such a barrier and you do not believe that you will be able to complete the project within the allotted timeframe, contact the Council Program Specialist as soon as possible. A no-cost extension may be granted in certain unforeseen circumstances. This would allow the project end date to be pushed back in order to complete the project. See <a href="Appendix D">Appendix D</a>, <a href="Frequently Asked Questions">Frequently Asked Questions</a> for more information on no-cost extensions.

#### **Quarterly Program Report**

This is where you will report on and evaluate the progress made in reaching the stated Work Plan objectives and activities. Five Program reports are required: one report for each quarter, and a final summary report due at the end of the project. The final summary project report is shared with Council members; quarterly reports may also be shared.

Each quarter, you will report the progress of the subaward project in the Work Plan tab of DD Suite. When reporting on activities, provide enough detail to inform the readers of what work was started or completed in the quarter. It is not enough to answer with one or two lines of narrative. Describe the work that has been accomplished, any areas of concern, barriers, or setbacks, as well as any unexpected benefits or positive outcomes. Examples of what to include: details of the activities that occurred, the number of people who participated and how they felt about the activity, how the participants were recruited and what locations were represented; who were the members of a planning committee; how volunteers were recruited and utilized; whether everything went as planned, describing any unexpected plusses or barriers. If an activity has not yet occurred, it is sufficient to note when the activity will begin.

Materials such as training manuals, worksheets, or published items developed for the subaward project will be uploaded into DD Suite and/or shared with Council staff.

#### **Final Summary Project Report**

A final summary project report is due 30 days after the end of the subaward year. Information from the final report is used as the basis for the Council's annual Program Performance Report to the federal government. The purpose of this report is not simply to repeat information that has already been provided through other reporting requirements, but to draw conclusions about the success of the Council-funded project. Reflecting on the entire project, this report will summarize:

- <u>Project Accomplishments and Results</u> Direct accomplishments attributed to the project will include a summary of the results of the project's objectives and activities.
- <u>Impact of Project Activities on Target Population</u> Outcomes for the target population will include a description of before and after status of the target population and should be based on collected data or qualitative results of the project.

- <u>Barriers or Problems Encountered and Actions to Overcome</u> Describe problem solving efforts. You may encounter barriers or problems in implementing the project. Describing difficulties and successful actions to overcome difficulties will provide insight for future Council-funded projects.
- <u>Project Sustainability</u> You are expected to implement plans to sustain project activities or outcomes once subaward funds end. In the final summary report, you must provide details on what is being sustained and who is responsible for carrying the project forward.
- <u>Personal Success Stories</u> Stories are a great way to show the impact of the activity on participants.
   Include comments and/or one or two stories that participants shared during or after the project.

   Examples include a story from a self-advocate who learned how to speak up about something they wanted, or other new skills learned; teachers sharing that they are anxious to use what they learned, or a follow-up that says how they used what they learned and the success the student(s) experienced.

#### **Demographics and Key Performance Indicators (KPI)**

In addition to the narrative reporting, data is collected to report on the diversity of participants and to gauge satisfaction of the project activity by people with intellectual and developmental disabilities and their families. These demographics and KPI are included in an annual report to the federal Administration on Disabilities that includes data from all the subawards funded by the Council in that year. These data are a critical piece of the report as they are reviewed at the federal level to evaluate the effectiveness of the Council in meeting the goals and objectives of our 5-Year State Plan.

Demographic information will be collected from project participants. This can be collected during registration if your project requires attendees to register for a project activity, or as part of the Satisfaction Survey. See <u>Satisfaction Survey</u> for additional information on demographics.

A list of KPI, definitions, and examples is included in <u>Appendix A</u> of this manual. Not all KPI will be relevant to your project. Review the list to determine which are appropriate and add those to your Work Plan. You will report the numbers for these KPI in each quarterly Program report. Only KPI that were not reported in the quarterly reports needs to be reported in the final summary report.

#### **Satisfaction Survey**

Subrecipients are required to collect demographic data and ask questions of project participants to rate their satisfaction with the project activities. This will include anyone who participated in the planning and/or the activities (e.g., members of a project planning committee, volunteers, activity participants, etc.).

Subrecipients will create a survey that will be the most appropriate for their audience. The draft survey will be submitted to the Council Program Specialist for review and approval. There are many ways to present the survey: it can be printed and handed out, it can be read out loud for non-readers, it can be sent electronically (this typically has a low return rate), or it can be incorporated into online trainings or activities by popping up on the screen and asking participants to mark their responses. Some participants may be comfortable writing out responses to questions while others may prefer to circle a Yes/No or an image of a thump up or thumb down in response to a question. Select the survey questions and delivery method that best fits the audience and project activity.

When creating the survey for your project, there are questions that must be asked and data that must be collected. Efforts must be made to collect this data.

<u>Demographics.</u> This will include Race, Ethnicity, Gender Identity, and Geographic Area of project participants. This information can be gathered as part of the registration, if required, or before, during or after the activity (see <u>Appendix B, Sample Satisfaction Survey</u>).

It is important to ask whether they are an individual with a developmental disability, a family member/guardian of an individual with a developmental disability, or a professional/other. This information is necessary for reporting KPI by the number of individuals with developmental disabilities and family members/guardians. SC1.4 asks for the total number of people trained or educated. This is where you will report the number of professional/other project participants.

Questions that <u>must</u> be included in the survey include these taken from the KPI:

- IFA 1.1/1.2/1.3 This will show the number of people with developmental disabilities (1.1), parents/family members (1.2), and others such as professionals or other stakeholders (1.3) who participated in the project or activity.
  - NOTE: If you have multiple sessions of the same training or activity and a person attends
    two sessions, they can only be counted one time. If they attend two sessions or training on
    different topics, they can be counted for each session or activity they attend (see <a href="Appendix D">Appendix D</a>, Frequently Asked Questions, KPI).
- IFA 3.1A/3.1B This question asks whether the person with developmental disabilities (3.1A) and their parents/family members or guardians (3.1B) are satisfied with the activity in which they participated.
- IFA 3.1A/3.1B follow-up Why are they satisfied or dissatisfied with the project? What did they like
  or dislike about the training or activity? They may want to share how they will use what they learned.
  This information would be used in the Final Project Summary to add weight to the outcomes of the
  project.

### Helpful question to ask include:

IFA 2.3IND/2.3FAM – This question helps to know whether people with developmental disabilities
 (2.3IND) and parents/family members/guardians (2.3FAM) are better able to say what they want,
 what services and supports they need, or what is important to them after participating in the training
 or activity.

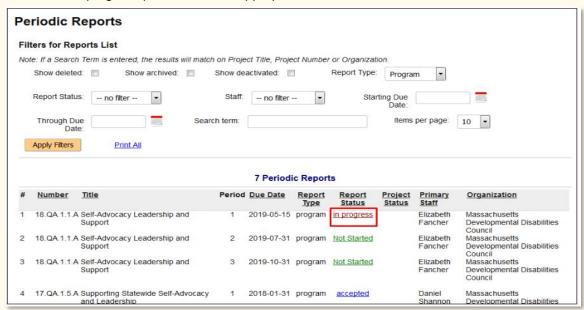
In addition to asking these required questions, you should be familiar with all KPI in order to incorporate them into the Satisfaction Survey and to report Systems Change (SC) that occurs as a result of your project. SC is data that you will track as the Project Director, not questions you would ask on the Satisfaction Survey. However, if your project is to provide training to professionals in the developmental disabilities field, you could follow up with them after the training to ask questions such as what policies or procedures they will or have created or implemented as a result of the training. Refer to <a href="Appendix A, Key Performance Indicators">Appendix A, Key Performance Indicators</a> for more information, definitions, and examples. SC KPI are reported in the Work Plan with the other KPI.

Your survey may ask other questions to obtain feedback in order to improve your project or the delivery of your project, and other questions that you feel are important or helpful to know and report. There is an option to create your own KPI for reporting this data in DD Suite if you feel the information you collect helps to tell the story of the success of your project.

### Entering Program Reports and Key Performance Indicators in DD Suite

Follow the steps detailed below to complete the Program Report and enter the KPI. These steps and screen shots are taken from the DD Suite Help tab.

- 1. Log in to your DD Suite account and select the Periodic Reporting button on the dashboard for your project.
- 2. Identify the program report that needs to be completed and submitted (the status should read "Not Started" or "in progress") and select the appropriate link.



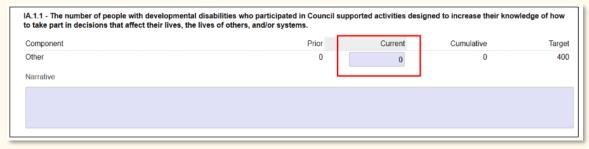
- 3. Include the following in the Program Narrative field:
  - A brief summary of the status of the project just for the quarter.
  - A description of any barriers that prevented or delayed the accomplishment of the objectives, activities and/or project performance indicators. Identify any strategies that will be used to overcome these barriers.
  - A brief description of the work to be accomplished during the next quarter.
  - Any additional information that is relevant to the project or that may be of interest to the Funding Organization (Council). This may include changes in project methodology approved by the Funder, unanticipated accomplishments of the project, linkages with other organizations, or additional resources contributed to the project that were not originally identified.
- 4. The Objectives and Activities will be generated from the approved Project Work Plan. For each Activity, enter any developments corresponding to that activity in the Narrative fields. If you need to add an activity to an objective, select the corresponding link.



**NOTE:** A blue box will appear as you scroll down that will remind you of the report's status, as well as keep track of the objective and activity you are currently reviewing.



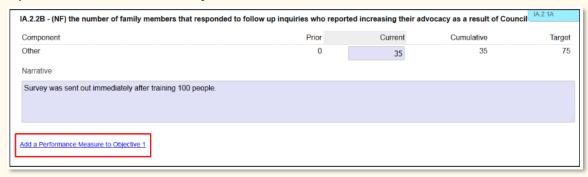
5. For each performance measure, specify numbers for the current period in the "Current" field.



6. Key Performance Indicators may have sub measures. These sub measures allow breaking the values into more categories. Simply enter the appropriate numbers in the current column.

Component	Prior	Current	Cumulative	Targe
Male	0	0	0	5
Female	0	0	0	4
Other	0	0	0	33

7. Funding organizations recognize that projects can generate Key Performance Indicators that were not anticipated. If there are additional Key Performance Indicators, include them by selecting the "Add a Key Performance Indicators to Objective..." link.



- 8. When adding another performance measure, select it from the drop-down menu.
- 9. Select the "continue" link to add the performance measure or the "[x]" link to delete it.
- 10. Refer to Step 5 to report on this new performance measure.
- 11. Remember to save your work by selecting the "Save Report Changes" button.



12. Select the "Save and Submit Report" button when you are ready to submit.

**NOTE:** A notification email will be sent to the staff member(s) to whom the subaward is assigned.



13. The Council may allow its subrecipients to view internal comments in order to communicate with them. In this case, the "Funding Organization Comments" will appear at the top of the report overview page.

### **Expenditure Report**

Your final budget, as approved by the Council, becomes the Expenditure Report template in DD Suite. This is where you will enter the actual subaward expenditures related and essential to the project that were incurred during the reporting period. Any matching funds for the reporting period will also be entered here. For each expenditure and match amount reported, documentation must be attached. Examples of documentation include:

- Payroll expenses for all project staff (copies of timesheets noting the hours worked on the project, verification of payment)
- Office expenses (receipts for photocopies, mail/postage, verification of monthly prorated telecommunications and rent)
- Travel expenses (agendas for meetings/trainings/conferences, travel logs, receipts for flights and other expenses)
- Consultants (invoices, payments, or receipts)
- Other expenditures approved for the project (rental for meeting space, training supplies)
- Timesheets reflecting volunteer time and how the value of their time was calculated

The Program and Expenditure reports and documentation are reviewed together. Payments will not be processed until all reports have been received and any necessary corrections have been made as requested. The following are reasons a report may not be accepted:

- A report is missing or incomplete
- Insufficient information in the Program report
- Errors in the Expenditure report
- Missing documentation of expenditures and/or matching funds

You will receive an email notification through DD Suite of any additional information or corrections required. The Council Program Specialist may also contact you by email and/or by phone to answer questions. Once the requirements are met and reports are approved by the Council Program Specialist, payments will be processed for reimbursement.

Expenditure reports are submitted quarterly. (If you prefer to submit your Expenditure reports more frequently, contact the Council Program Specialist.) The expenditure report for the fourth quarter of the subaward is the final expenditure report. However, if your subaward is approved for a no-cost extension, a quarterly expenditure report will be added, with the final expenditure report due 30 days after the end of the extension. The report due date may be extended from 30 days to up to 60 days if additional time is needed at the end of the subaward to allow for all bills associated with project activities to pass through your agency's accounting system. Contact the Council Program Specialist if you will require additional time beyond the 30 days. Final expenditure reports received after 60 days will not be processed.

**NOTE:** No more than 75% of Council funds will be disbursed through the third quarter unless the project is completed. All reports and source documentation must be submitted and approved before subaward funds will be disbursed. Final payment is calculated according to actual subaward expenditures; therefore, final payment may not be the entire remaining subaward funds.

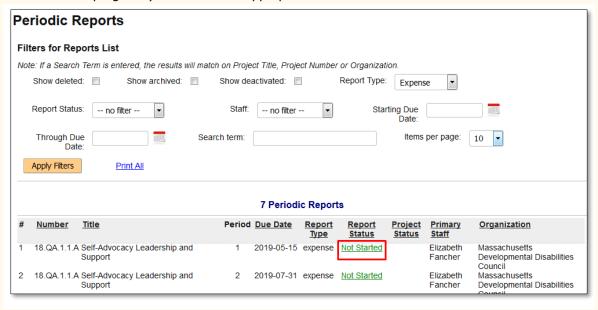
### Entering Expenditure Reports in DD Suite

An Expenditure Report is required each quarter. All expenses charged to Council funds as well as all matching funds will be entered in DD Suite. If no expenditures were made and no matching funds were used for the quarter, mark these with zeroes.

**NOTE:** If it is necessary for your organization, DD Suite allows you to limit staff access to prevent staff from seeing and accessing either work plan or budget information. To learn more, log in to your DD Suite account and go to the Grantees section in the Help tab.

To complete the Expenditure Report, follow the steps detailed below as taken from the DD Suite Help tab.

- 1. On your dashboard, select the "Periodic Reporting" button.
- 2. Identify the expense report that needs to be completed and submitted (the status should read "Not Started" or "in progress") and select the appropriate link.

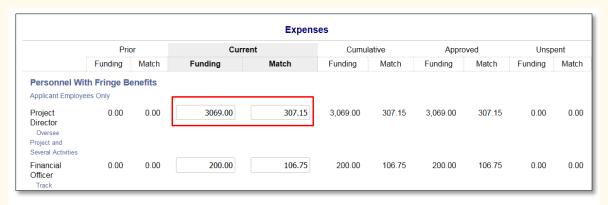


- 3. In the "Expense Report Narrative" field, describe any financial issues or achievements.
- 4. The system automatically provides the sum totals of the budget categories for the Budget Totals section generated from the approved Project Budget Plan (these fields are not editable).

A description of each column is provided below:

- **Prior** The amount of funds spent that you have reported prior to the current reporting period.
- Current The amount of funds that you spent during the current reporting period.
- **Cumulative** The cumulative amount of funds spent through the end of the current reporting period (sum of Prior and Current columns).
- **Projected** The amount for the project in your approved Project Budget Plan.
- Unspent The amount of funds that have not yet been spent for the project.

5. In the "Current" column, itemize expenses directly incurred by grant activities under the appropriate categories (for example: personnel, travel, supplies, etc.) in accordance with your approved Project Budget Plan. Enter the amounts being charged to the project for the reporting period (for each category).



6. **Remember to save your work** by selecting the "Save Report Changes" button.



- 7. Select the "Save and Submit Report" button when you are ready to submit.
  - \*Note: A notification e-mail will be sent out to the staff member(s) to whom the grant is assigned.



8. To add attachments to the project, select the "Attachments" button. Confirm that you have saved all changes before leaving the page.



9. Select the "add file" link.



- 10. Select the "Browse" button and pick a file from your computer that you wish to upload.
- 11. In the "Report Period" dropdown menu, you can choose to either attach the file to the overall project or a specific report.
- 12. Insert a title that describes the document that is going to be uploaded.
- 13. Add any additional information including the author of the file, an abstract and keywords (separated by commas.)



- 14. Select the "Save" button to add the attachment.
- 15. The Funding Organization may allow its grantees to view internal comments in order to communicate with them. In this case, the "Funding Organization Comments" will appear at the top of the report overview page.

### **Subaward Monitoring**

On December 26, 2014, the Office of Management and Budget (OMB) published new requirements for federal award programs entitled Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (also known as the Supercircular). The State of Nebraska audit office requires a process to gather source documentation from all subrecipients who receive federal funding. OMB developed the Supercircular in response to directives to strengthen accountability by intensifying efforts to eliminate payment error, waste, fraud, and abuse.

The Supercircular applies to federal agencies that make federal awards to non-federal entities, as well as to non-federal entities that receive federal subaward funds. Because the Nebraska Council on Developmental Disabilities receives federal funding mandated through the Developmental Disabilities and Assistance and Bill of Rights Act of 2000, all Council subrecipients must adhere to this requirement.

As a subrecipient of federal funding through the Nebraska Department of Health and Human Services (DHHS) Nebraska Council on Developmental Disabilities, you will be responsible for providing source documentation for all expenditures and matching funds. This will be achieved by attaching documentation for the expenditures and matching funds in DD Suite when submitting your quarterly Expenditure report. Examples of items that should be submitted include time sheets for all project staff and volunteers, paystubs, fees charged to the subaward, travel documentation, receipts, sales invoices, deposit slips, or any other original record that contains details to substantiate a financial transaction.

Additional source documentation may be requested when needed for specific expenditures. This requirement to review source documents provides for consistent and transparent stewardship and accountability of federal funds. Council staff reserve the right to perform an on-site visit to review source documentation.

See <u>Appendix C</u> to view the Subaward Monitoring Requirement memo and Subaward Monitoring: Procedures for Reviews.

### Administrative Procedures

### **Publications and Subaward-Supported Conferences or Trainings**

Written products developed with subaward funds shall be reviewed and approved by Council staff prior to their use or dissemination. The materials must acknowledge support of the Department and the federal granting agency by including the following statement:

This project was supported, in part by grant funds provided to the Nebraska Developmental Disabilities Councils through Grant #2001SCDDNE, from the U.S. Administration on Disability, Department of Health and Human Services, Washington, DC 20201. Grantees undertaking projects with government sponsorship are encouraged to express freely their findings and conclusions. Points of view or opinions do not, therefore, necessarily represent official ACL policy.

Publicity concerning activities supported by subaward funds should also include this acknowledgment and be reviewed by Council staff prior to distribution.

You are required to submit an electronic copy (if available) and hard copies upon request of all work products developed with subaward funds. You may copyright any work developed under a Council subaward that is subject to copyright. The federal awarding agency and the Department reserve a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for Federal and State purposes and authorize others to do so.

#### **Subaward Closeout**

Closeout activities are the final review of a Council-funded project. The Council Program Specialist checks to ensure that all required documentation and reports have been submitted in DD Suite. In order to close out subaward accounts and determine year-end balances, final expenditure reports must be received within 60 days from the end of the funding period. Requests for reimbursement received more than 60 days after the end of the funding period will not be paid.

### **Termination and Suspension**

Termination and suspension of a Council-funded project occur pursuant to the terms and conditions in the signed subaward. See Addendum A, DHHS General Terms – Subaward in the signed subaward.

#### **Personnel Policies**

Each Council-funded project must have personnel policies and procedures in place for staff working on activities supported by subaward funds. Staff paid with subaward funds and persons donating time as match to the project must document the time they spend on project-related activities. Time and activity records must be kept on file. Current job descriptions of project staff also must be on file.

### **Financial Management**

According to the DHHS General Terms (Cost Principles and Audit Requirements), the subrecipient shall follow all federal audit requirements, including but not limited to those in 2 CFR § 200 Subpart F federal audit requirements, which are dependent on the total amount of federal funds expended by the subrecipient. Circulars pertaining to cost principles that must be followed by subrecipients are referenced on the internet:

http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200 main 02.tpl http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf

Fiscal control and accounting procedures of subaward funds must be sufficient to allow preparation of required reports and permit the tracing of funds to source documentation. The system must provide for:

- Accurate, current, and complete disclosure of expenditures;
- Accounting records that adequately identify source of funds (federal, cash match, in-kind match) and purpose for expenditures;
- Effective internal controls to safeguard all cash, real and personal property and other assets, and to ensure that all such property is used for authorized purposes; and
- Budget controls that compare budgeted amounts with actual revenues and expenditures. OMB cost
  principles will be used to determine whether costs are allowable. Accounting records must be supported
  by source documentation such as canceled checks, paid bills, paystubs, time and attendance records,
  and similar documents that would verify the nature of revenues and costs associated with the Council
  project.

### **Audits**

Audit requirements differ based on the total amount of federal funds that your agency/organization receives from all sources. Please refer to the signed subaward's Audit and Accounting Responsibilities section of the DHHS General Terms to determine what audit requirements apply to your agency/organization. All required audit information must be submitted directly to:

Nebraska Department of Health and Human Services Financial Services PO Box 95026 Lincoln, NE 68509-5026

# Appendix A

# Key Performance Indicators

### Key Performance Indicators (KPI)

Key Performance Indicators (KPI) are required for all Council subawards. Not all KPI will apply to your project; however, you should review the list and include those that are relevant. The Council Program Specialist will review and may request changes to your project's KPI.

When collecting data from individuals who have a developmental disability AND are family members of an individual with developmental disabilities, select the "best fit" category related to the activity for reporting purposes. For example, if a workshop was held to increase knowledge about a topic that is not specific to self-advocacy or family advocacy (e.g., a general health related training), the subrecipient would determine the "best fit" category for the participant(s).

Subrecipient will use all good data provided to them. For example, when collecting satisfaction and outcome data in a survey, if a survey had five questions about outcomes and a respondent only answered three of the questions, responses for those three questions should be reported in the Key Performance Indicators.

Demographic data should report the number of individuals with developmental disabilities and the number of family members/guardians of individuals with developmental disabilities (IFA 1.1 and IFA 1.2) who participated in the project activity. Effort should be made to collect surveys from all participants.

### **Individual and Family Advocacy (IFA) Key Performance Indicators**

IFA	Output Measures	Subrecipient Guidance
IFA 1.1 IFA 1.2 IFA 1.3	The number of people with developmental disabilities (1.1), family members (1.2), and "Professionals/others" (1.3) who participated in Council supported activities designed to increase their knowledge of how to take part in decisions that affect their lives, the lives of others, and/or systems.	Collect the number of people with Developmental Disabilities, family, and others who participated in Council supported activities.  Definition Supported: To give resources to something/someone to enable it/them to exist, function, or act. Resources could include such things as staff or volunteer time, funding, technical assistance, and/or in-kind contributions.  Examples of how to collect data: Attendance rosters, sign-in sheets, program roll sheets, registration forms, and other documents that document the number of people who participated in a Council supported activity.
IFA 2.1.A 2.2.A	After participation in Council supported activities, the number of people with developmental disabilities (2.1.A) and family members (2.2.B) who responded to follow-up inquiries about increasing their advocacy as a result of Council work.	Collect the total number of responses to the inquiries from people with developmental disabilities and family members who participated. This is a question asked after the project is completed when subrecipient contacts participants to follow up with them on how they used the information learned from the project.  Definitions  Advocacy: Speaking on behalf of or in support of another person and/or actively supporting a cause or proposal.  Self-Advocacy: Speaking for yourself, making your own decisions, knowing your rights and responsibilities, problem solving, reaching out to others when you need help, learning about self-determination.
IFA 2.1.B 2.2.B	The number of people with developmental disabilities (2.1.B) and family members (2.2.B) who responded to <u>follow up</u> inquiries who reported increasing their advocacy as a result of Council work.	Of the total responses from 2.1A and 2.2A, collect the number of <u>positive</u> responses.

IFA 2.3IND 2.3FAM	The number of people with developmental disabilities (2.3IND) and family members (2.3FAM) who are better able to say what they want or say what services and supports they want or say what is important to them.	Of the total responses from 2.1A and 2.2A, collect the number of <u>positive</u> responses.
IFA 2.4IND 2.4FAM	The number of people with developmental disabilities (2.4IND) and family members (2.4FAM) who are participating now in advocacy activities.	Of the total responses from 2.1A and 2.2A, collect the number of <u>positive</u> responses.
IFA 2.5IND 2.5FAM	The number of people with developmental disabilities (2.5IND) and family members (2.5FAM) who are on cross disability coalitions, policy boards, advisory boards, governing bodies and/or serving in leadership positions.	Of the total responses from 2.1A and 2.2A, collect the number of <u>positive</u> responses.
IFA 3.1A 3.1B	The number of people with developmental disabilities (3.1A) and family members (3.1B) who are satisfied with a project activity.	Collect the number of satisfied responses to the question.

### **Systems Change (SC) Key Performance Indicators**

<u>Systems change efforts</u> are intended to be viewed as a continuum and could reflect community systems, statewide systems, or one agency – systems from small to most broad.

Output measures are numbers that reflect efforts related to policy and/or procedures changed or created.

<u>Systemic change activities</u> (as defined in the DD Act Final rule, 2015) is defined as a sustainable, transferable, and replicable change in some aspect of service or support availability, design, or delivery that promotes positive or meaningful outcomes for individuals with developmental disabilities and their families.

### **Systems Change (SC) Output Measures**

### **Subrecipient Guidance**

		Subjectifient duidance
SC 1: 0	utput Measure	
The num	ber of efforts to transform fragmented approaches	
into a co	ordinated and effective system that assures	
individua	Is with developmental disabilities and their families	
participa	te in the design of and have access to needed	
commun	ity services, individualized supports, and other forms	
of assista	ance that promote self-determination, independence,	
productiv	vity, and integration and inclusion in all facets of	
commun	ity life.	
SC 1.1	The number of policy and/or procedures created or	<u>Definitions</u>
	changed.	<i>Policy</i> : A statement of how an organization or entity intends to conduct its
		services, actions, or business. Policies provide a set of guiding principles to help
		with decision-making.
		Procedure: A description of how each policy will be put into action. Procedures
		often outline who will do what; what steps will be taken, and which forms to
		use.
		Policy and/or procedure change: A policy and/or procedure change reflects a
		course of action that has the potential to create or improve policies and/or
		procedures regarding services and supports that promote self-determination,
		independence, productivity, and integration and inclusion in all facets of
		community life.
		Created: To cause to come into being.
		and the same of the same and th
		Change: The act of making or becoming different.
		Implement: To put into action, carry out.
		Improve: To make or become better.
		Example: A subrecipient has planned to implement a project to improve
		services at one specific agency or organization. It is expected that the existing

		policies of the specific agency or organization will be improved. The expected number of policy changes would be reflected as an Output. <b>Note:</b> See definition of systemic change activities to help guide decisions about what types of policies/procedures results to count.  If a subrecipient expected to draft a policy and/or procedure, but there was no draft or creation of a policy and/or procedure realized during the project period, subrecipient would include an explanation of the barriers or other circumstances in the objective narrative of the periodic report.
SC 1.2	The number of statute and/or regulations created or changed.	<u>Definitions</u> Statute: A law or other enactment made by a legislature and expressed in a formal document.
		Regulation: A rule or administrative code issued by governmental agencies at all levels, municipal, county, state, and federal. Regulations are not laws but have the force of law since they are adopted under authority granted by statutes.
		Statute and/or regulation change: A law and/or rule or administrative code that has the potential to improve laws, rules, or administrative codes regarding services, supports, and other assistance that promote self-determination, independence, productivity, and integration and inclusion in all facets of community life.
		Created: To cause to come into being.
		Change: The act of making or becoming different.
		Example: A subrecipient is implementing a project and part of the project is to research, analyze, and recommend regulation changes for a specific issue. A regulation change (drafted, created, or changed) would be reflected in this category as an output.
SC 1.3.1	The number of promising practices created.	Promising Practice: A practice with an innovative approach that improves upon existing practice and positively impacts the area of practice. The practice should demonstrate a high degree of success and the possibility of replication in other agencies or settings but has not been tested.

		Example: A project implements a proven leadership training program for people with developmental disabilities and their families. As part of the implementation, the subrecipient plans and expects to improve part of the training program with a new approach that positively impacts the overall leadership training program. The expected Output for creating a promising practice would be reflected.
SC 1.3.3	The number of best practices created.	Definitions Best Practice: A technique, methodology, or program that has proven to reliably lead to a desired result can be considered a best practice.  Created: To cause to come into being.  Example: A subrecipient implements a project that uses a technique to positively impact people with developmental disabilities and their families. The Council expects to demonstrate the technique to be a best practice through experience. The Output of creating a best practice would be reflected.
SC 1.4	The number of people trained or educated through Council systemic change initiatives.	<ul> <li>Definition Trained or educated: Training is an organized activity designed to give information and/or instructions to improve performance or help attain knowledge or skill. Educated means to give information about something. This number would not include public education, marketing, tabling, web-site hits, newspaper subscribers, social media likes, tweets, retweets, etc.)</li> <li>The output number would reflect "others trained/educated" such as service providers, policymakers, direct support professionals, other stakeholders; this Output number would not include people with developmental disabilities or family members of people with developmental disabilities as those Output numbers would be reported under IFA 1.1 and 1.2.</li> </ul>

### **System Change (SC) Outcome Measures**

### SC 2.1.1 The number of policy, procedure, statute, or regulation changes *improved* as a result of systems change.

Outcomes and outputs will align on many items. For example, if the subrecipient planned to improve one policy, procedure, statute, or regulation, the Output (of one policy, procedure, statute, or regulation) would be reported in the Output section, but also as a short term (or immediate) Outcome. The Outcome would be the result of engaging in the activity – in this case one policy, procedure, statue, or regulation was improved.

**Note:** Outcomes would be considered short-term or immediate. Data could include statewide changes and local or organizational level changes. Improvement could be a result of the creation of, or a change to, a policy, procedure, statute, or regulation.

### SC 2.1.2 The number of policy, procedure, statute, or regulation changes *implemented*

Outcomes and outputs may align. For example, if the subrecipient planned to improve one policy, procedure, statute, or regulation and the policy <u>was also implemented</u> during the reporting period, the policy, procedure, statute, or regulation would be reflected as an output and the policy, procedure, statute, or regulation implemented would be reflected as an outcome in this section.

### SC 2.1.3 The number of promising and/or best practices *improved* as a result of systems change activities

Outcomes and Outputs will align on many items. For example, if the subrecipient planned to improve a promising or best practice, the Output (of one promising or best practice) would be reflected in the Output section but would also be reflected as a short term/immediate Outcome. The Outcome would be the result of engaging in the activity – in this case one best or promising practice was improved.

- **Note 1:** Outcomes would be considered short-term or immediate. Data could include statewide changes and local or organizational level changes. Improvement could be a result of the creation of, or a change a promising or best practice.
- **Note 2:** If a subrecipient is replicating the promising or best practice several times during a reporting period, the promising or best practice would be counted once in the data section. However, the replication information could be included in the narrative section of the periodic report.

### SC 2.1.4 The number of promising and/or best practices that were *implemented*

Outcomes and Outputs may align. For example, if the subrecipient planned to implement a promising or best practice, the Output would be reflected in the Outcome section as one promising or best practice – if the promising and/or best practice was also implemented during the reporting period, the promising and/or best practice implemented would also be reflected as an outcome.

# Appendix B

# Satisfaction Survey

### **SAMPLE Satisfaction Survey**

This project is supported with funds from the Nebraska Council on Developmental Disabilities. Please complete this survey to help the Council develop and strengthen programming for individuals with intellectual and developmental disabilities and their families. You may request assistance with completing this survey. This survey is anonymous and completely voluntary. Thank you for your participation.

Agency Name:		Project Name:	
Please check the ON	IE statement that describ	bes you best.	
☐ I am a person with	a developmental disability.		IFA 1.1
☐ I am a parent, fami	ily member, or guardian of a	person with a developme	ental disability. IFA 1.2
	velopmental disability and I a activity for the following rea		of a person with a disability. I am
Dane		Condon	Coopyrubic Aver
Race		Gender  □ Female	Geographic Area
☐ White, alone ☐ Black or African Am	porican along	☐ Ferriale ☐ Male	☐ Urban (over 50,000 people)☐ Rural (under 50,000
☐ American Indian or		☐ Other	people)
☐ Hispanic/Latino	Alaska Native, alone	L Other	F F /
☐ Asian, alone		Ethnicity	
· ·	ther Pacific Islander, alone	☐ Hispanic	
☐ Two or more races		□ Non-Hispanic	
☐ Race unknown		·	
Please circle a Thur	nbs Up (for Yes) or a Thu	ımbs down (for No) for	each of these questions:
My adv	ocacy skills and abilities hav	ve increased because of th	nis activity. IFA 2.1A/2.2A
I know	more about the topics that	were talked about at this	activity.
Before	I came to this activity, I was	s able to say what I want	and what is important to me.
If you circled Yes, plea	ase tell us about a time you	told someone what you n	eeded or what was important to you.
			<del>-</del>

	<del>-</del>
6 9	After being at this activity, I am able to say what I want and what is important to me.  FA 2.3IND/2.3FAM
6 9	Before I came to this activity, I was participating in advocacy activities.
6 9	Because of this activity, I am now participating in advocacy activities. IFA 2.4IND/2.4FAM
6 9	I am currently serving on a cross-disability coalition, policy board, advisory board, board of directors, or am a leader in disability advocacy.  IFA 2.5IND/2.5FAM
If you circled	Yes, please tell us what group or agency you are working with or about your leadership activities.
6 9	Being at this activity makes me feel connected to other people like me.
6 9	I learned about activities or other things in the community that can help me or my family member.
6 9	I am satisfied with my experience at this activity.  IFA 3.1B/3.2B
6 9	This activity helps people with developmental disabilities and their families.
What was your fav	orite part of this activity?
Is there something	you would change about this activity next time?
	what you have learned at this activity? (Examples: I will speak up and advocate for myself or II become involved in more activities, I will participate on a board or coalition, or something
If you have additio	nal comments, please write them here.

Thank you for your sharing your opinions with us!

# Appendix C

# Subaward Monitoring

To: DD Council Subrecipients

From: Kristen Larsen, Executive Director

Nebraska Council on Developmental Disabilities

Re: Subaward Monitoring Requirement

In December 2014, the Office of Management and Budget (OMB) published requirements for federal award programs entitled Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200, also known as the Supercircular). The State of Nebraska audit office requires a process to gather source documentation from all subrecipients who receive federal funding. OMB developed the Supercircular in response to directives to strengthen accountability by intensifying efforts to eliminate payment error, waste, fraud, and abuse.

The Supercircular applies to federal agencies that make federal awards to non-federal entities, as well as to non-federal entities that receive federal grant funds. Since the Nebraska Council on Developmental Disabilities receives federal funding mandated through the Developmental Disabilities and Assistance and Bill of Rights Act of 2000, all Council subrecipients must adhere to this requirement.

As a subrecipient of State of Nebraska Department of Health and Human Services, Nebraska Council on Developmental Disabilities funding, you will be responsible for providing source documentation for this requirement. These documents will be attached with each expenditure report in DD Suite, the grant management system used by the Council for all subaward reporting. For your reference, the procedures used in reviewing source documents can be found on the following page.

Council staff are responsible to review source documents. Expenditures for the budget line items and reported match will be reviewed. Examples of source documentation that subrecipients will attach for review include but are not limited to timesheets for all staff and volunteer time; fees charged to the grant; travel documentation; receipts; sales invoices; deposit slips; or any other original record that contains details to substantiate a financial transaction.

This requirement to review source documents provides for consistent and transparent stewardship and accountability of federal funds. Please contact the Council Program Specialist at <a href="mailto:DHHS.DDCouncil@nebraska.gov">DHHS.DDCouncil@nebraska.gov</a> with questions.

#### **Nebraska Council on Developmental Disabilities**

### **Subaward Monitoring: Procedures for Reviews**

These procedures summarize the subaward monitoring review process for federal funds awarded by the Nebraska Council on Developmental Disabilities and monitored by the Nebraska Department of Health and Human Services. Council staff will follow these procedures when conducting all reviews.

Subrecipients submit quarterly expenditure reports in DD Suite. Documentation of these expenditures and reported matching funds are attached with the expenditure reports. These documents will be reviewed by Council staff prior to approving any payments of expenditures.

#### Source document items to review:

- Timesheets and paystubs for all project staff, timesheets of volunteers, fees charged to subaward, and accompanying payments;
- Documentation of travel expenses applied to the project including verification of attendance, need for travel, and actual expenses (e.g., mileage log, printed map of route driven, flight information, or other documentation);
- · Office expense invoices;
- Other items such as receipts, sales invoices, deposit slips, or any other original records that contain the details to substantiate a financial transaction.

Review source documents for the reported expenditures.

Test the transactions for being necessary, reasonable, allowable, allocable, and actual. The following examples are provided for testing transactions. These are examples only, and not an exhaustive list.

- a. Necessary and Reasonable Accounting records must be supported by source documentation such as canceled checks, paid bills, timesheets and paystubs (showing the amount of time that staff worked on the subaward), and similar documents that would verify the nature of costs associated with the subaward project. Common forms of documentation include mileage or travel logs for mileage expenses claimed, and office receipts or records showing subaward related expenses of rent, utilities, and communication along with the percentage charged to the subaward. Compare amount of rent, utilities, communications, payroll taxes and insurance, etc., to the percentage of time that project staff work on the project (20% of personnel time allocated to the project means 20% of payroll, rent, utilities, communications, and other related line items can be requested).
- b. Allowable All line items listed must be allowable under federal subaward guidelines. All claimed operating expenses must be related and essential to the subaward project. Review documents to determine whether reporting of personnel time was accurately charged to the subaward.
- c. Allocable Nebraska Department of Health and Human Services policy is that services must be provided and goods received prior to claiming reimbursement. Therefore, if it is near the end of the subaward period, the subrecipient should not purchase a lot of office supplies, educational materials, etc.
- d. Actual Receipts support the exact cost or percentage of cost. In-kind and cash match must have documentation showing the actual value of the match. Examples: An invoice showing the value of meeting space that was donated; an invoice showing the cost of an event speaker, the amount the subrecipient was responsible to pay and the amount donated as in-kind match.

# Appendix D

# Frequently Asked Questions

### Frequently Asked Questions

### **Project Goals**

#### Can I make changes in the Project Goals?

The project goals were approved by Council members during the review of your application for funding. They cannot be added to or deleted without prior approval from the Council office. A written request detailing the change must be submitted to the Council Program Specialist. You will receive a written response regarding the change request. Proposed changes that significantly alter the direction of the project may not be approved. In addition, some changes may require a budget revision or new completion date. These additional changes will be taken into consideration when reviewing the request.

#### What do I do if the subaward cycle will be over before I accomplish the project goals?

In certain circumstances, a **no-cost extension** may be granted. A no-cost extension is additional time (no more than three months past the end of the subaward cycle) to complete project activities utilizing remaining subaward funds. No additional funds are awarded. The no-cost extension is granted only when extenuating circumstances have prevented substantial progress in achieving project activities. You must submit a written request that describes the reason for the extension and how it will affect the project activities. This request must be received in the Council office a minimum of eight weeks prior to the end of the subaward cycle. If the no-cost extension is approved, you will receive information from the Council office outlining the additional reporting requirements. Contact the Council Program Specialist as soon as you know that you may be unable to complete your project by the end of the subaward period.

# What happens if there is a natural disaster or event that stops my project before it is completed?

In the event that a natural disaster or similar event occurs and you cannot continue work on your project for a time, it will not be held against you. Contact the Council Program Specialist as soon as possible if such an event occurs. A no-cost extension may be granted. See Force Majeure in Addendum A – DHHS General Terms – Subaward section of the signed subaward.

### **Demographics and Key Performance Indicators**

It is understandable that during the first quarter of the subaward, some projects may have very few numbers to report. The important consideration is to be accurate in what you do report. There will be no penalty for lower numbers due to the expected time needed to get the subaward project up and running. If, after a few quarters, progress continues to be slow, the Council Program Specialist may contact you regarding the lack of expected progress.

# How can I avoid counting someone more than once if they participate in more than one activity of the project?

Duplication occurs when someone or something has been counted twice under the same performance measure within the subaward year. This is true even in cases where a project goal has been structured to include the same performance measure under multiple objectives. For example, if a subaward includes the same performance measure under Objectives 1 and 2 of a project, a person or thing that has been included under one objective cannot be counted again under another objective. This also applies to objectives in all project periods within a project year.

Example: Project A plans to hold four trainings in the subaward year. At the first training, the sign-in sheet for Project A shows the following people attended the training:

Name	Address	Are you paid with federal funds
		to participate in this project?
Joe S.	123 High St., Omaha	N
Karen Carpenter	1340 S. Main St., Kearney	N
Holly Patterson		Υ
Jeff Johnson	450 E. 10 <sup>th</sup> St., Scottsbluff	N

At a different training the following period, Project A collects the following names on their sign-in sheet:

Name	Address	Are you paid with federal funds to participate in this project?
Kevin Wallace	239 Lincoln St., Norfolk	N
Joseph Smith	123 High St., Omaha	N
Molly Johnson	450 E. 10 <sup>th</sup> St., Valentine	N
Cindy Smith	123 High St., North Platte	N

Based on the two sign-in sheets, the project would count four participants in their training in the first period. However, the project would only count three participants in their training in the second period because it is evident that Joe S. and Joseph Smith are the same person.

Individuals who are paid with federal funds to participate in the project are allowed to be counted towards the output or performance measure. However, if the project is generating in-kind match through program participation, individuals who are paid with federal funds will need to be subtracted from the match calculation. It is up to each subrecipient to ensure they have not duplicated their Key Performance Indicators. This is achieved through proper documentation.

### When should I report on the Key Performance Indicators?

The Key Performance Indicators are reported in DD Suite each quarter with the Program Report.

#### **Satisfaction Surveys**

# I have individuals with developmental disabilities, family members, and stakeholders in my audience. Should the Satisfaction Survey be given to everyone?

Yes, the Satisfaction Survey should be given to everyone. The survey asks participants to mark whether they are self-advocates, family members/guardians, or professional/other. When you have individuals in multiple roles participating in the project, they should mark the role that most closely reflects their participation in the project. For example, if there is a self-advocate or family member/guardian who is an agency representative participating in the project as the representative of that agency, they would complete the Professional/Other section. If they are an employee of an agency but participating in the project as a self-advocate or family member/guardian, they would complete the Self-Advocate or Family Member/Guardian portion of the survey.

### Do I have to get surveys from everyone who participates in my project?

Yes, to the best of your ability, gather satisfaction surveys from anyone involved in your project.

#### **Expenditures**

### Can I make changes in my line-item budget? If so, how is this done?

It is possible to make revisions to the line-item budget that was approved by the Council and noted in the

subaward from DHHS. Minor changes as noted below may be made without seeking approval. Changes other than those listed below must be requested in writing for approval.

- The cumulative change of all line items is less than 10% of the total subaward budget (total subaward budget includes both Council subaward funds and matching funds); AND
- A change would neither add nor eliminate a line item; AND
- A change in the budget does not change the goals and objectives of the project.

Because subrecipients cannot make changes to their application in DD Suite once it has been awarded, a written request must be made to the Council Program Specialist for all line item changes. The Council Program Specialist will be responsible to make the changes in DD Suite. The subrecipient may be allowed to make the changes upon agreement between the subrecipient and the Council Program Specialist.

### What if I have Project Revenue? How can it be used?

Project revenue is gross income received by a subrecipient that is directly generated by a project-supported activity or earned only as a result of the subaward during the time between the effective date of the subaward and the ending date as stated in the subaward notice. Examples of typical project revenue include participant fees for training events and income from the sale of commodities or items fabricated under the subaward. Project revenue is not Council funds awarded for the project. The Council allows agencies to use the project revenue to finance part of or the entire cash match share of the project budget or to support additional project activities. Subrecipients may choose to use a combination of these options.

# It is near the end of the subaward period and I want to buy a lot of office supplies, educational materials, etc., in order to use all the subaward funds allocated to the project. Are these expenses allowable?

The Nebraska DHHS policy is that services must be provided and goods received prior to claiming reimbursement. While the goods would be received during the subaward period, a substantial portion of the goods could not be consumed in the budget period. Therefore, this is essentially a short-term, non-interest-bearing loan from the Federal Government. Purchase of consumable supplies either far in advance of using them or near the end of the project is subject to disallowance as an expenditure that is not permitted for purchase using Council funds. If a disallowance is found, the dollar amount for the materials in question will be subtracted from the Expenditure Report and will not be reimbursed.

# What kinds of documentation must be kept tracking expenditures charged to the subaward project?

You are required to submit quarterly reports of project expenditures and activities using the template in DD Suite. In addition, documentation of the expenditures and match reported must be attached for review by Council staff. Examples of items to attach include time sheets and paystubs for all project staff, fees charged to the subaward, travel documentation, receipts, sales invoices, deposit slips, or any other original record that contains details to substantiate a financial transaction. **Documents must be kept for a minimum of three years from the last payment received.** 

# When requests for reimbursement are made to the Council office, how long does it take before my agency receives the funds?

It takes approximately four weeks for reimbursement to be sent electronically to the agency/organization once the expenditure report has been approved by the Council Program Specialist. The process for reimbursement within DHHS is as follows:

• All required reports/documentation are reviewed by the Council Program Specialist. The Expenditure Report is checked for errors and over-expenditures in line items or unallowable costs. Expenditures are

evaluated in relation to program activities to determine whether the expenses seem reasonable and are related and essential to the project. If there are any questions, the Project Director or Financial Officer is contacted.

- An electronic payment request is completed by Council staff. A record is kept of all disbursements made to the subrecipient.
- The Department's Financial Services Division checks the authorized amount of funds available and approves for payment.
- The request is then sent to the Department of Administrative Services for the State of Nebraska. The payment is authorized and sent to the subrecipient by electronic transfer.

### What can I do to ensure timely reimbursement of program expenditures?

Complete and submit all reports on time in DD Suite. The Program and Expenditure reports are reviewed together. Reimbursement is not made if reports or documentation are missing or incorrect.

#### What are matching funds?

Subrecipients must provide a portion of the funds needed to complete the project. Council funds are used to provide up to 75% of the funds with the subrecipient matching the remaining 25% of project costs through cash or in-kind contributions. **NOTE**: Federal funds, with the exception of Medicaid dollars received for services provided, are not allowable as match. Funds used as match for a NCDD subaward may not be used as match for another federal grant or subaward, and vice versa.

Cash match includes the use of the subrecipient organization's own funds or cash donations from third parties on project-related costs. In-kind match includes, but is not limited to, the valuation of donated goods and services. "In-kind" is the value of something received or provided by an outside source that does not have a direct cost associated with it. Examples include the value of non-paid volunteers working on project-related activities. Their hours are tracked using a timesheet similar to the way hours are tracked for project personnel. Include the calculation of the value of the hours for reference.

#### What kinds of records must be kept tracking match resources for subaward projects?

You are required to maintain written records that fully document both cash and in-kind match. In the case of third-party in-kind contributions, records must show how the value of the contributions was derived. Whether or not costs reported as match will be allowed is determined in the same manner as are costs charged to the Council subaward funds. The budgeted line items must be necessary to accomplish program activities and allowable if you were required to pay for them. In addition, resources that are used to match other federal or state subawards cannot be used as match for your project.

#### **Subaward Monitoring**

# What if I receive a request for modifications on my program report? Or there are findings and corrections needed to the expenditure report? Will funding for my project be in jeopardy?

Feedback on Program and Expenditure report reviews should not be viewed as a win or lose situation. The Council Program Specialist works in partnership with you to make your project successful. Requests for modifications to the program report are most often to provide additional information. You can avoid this by ensuring your reports are thorough and provide details on the work that was accomplished or when work will begin on activities that have not yet begun. One or two lines of generalized information is not sufficient to report on the work done in that quarter or for the project overall. Some projects run smoothly without issues. Other projects encounter barriers or problems that affect the activities and timelines in the Work Plan. Reporting the ups and downs of the project helps to provide a full overview of the project.

Subaward funds are a limited resource in demand by many agencies. Recommendations made by Council staff for improvements or changes in your project help to ensure that Council funds are put to the best use possible. Only in the most serious of circumstances would staff recommend the termination of project funding (the final decision is made by the Director of the Department of Health and Human Services). Potential reasons for termination are outlined in Addendum A, DHHS General Terms – Subaward in the signed subaward. Improper administration of the project or lack of performance to carry out the activities set forth in the project goals could result in termination of the subaward.