

State of Wisconsin Department of Administration  
Division of Energy, Housing and Community Resources

## **FLEXIBLE FACILITIES PROGRAM IMPLEMENTATION HANDBOOK**

### **CHAPTER 2: GRANT ADMINISTRATION**



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## CHAPTER 2: GRANT ADMINISTRATION

### 1.0 Grant Administration

An important part of any grant is grant administration. Grant recipients are required to prepare, maintain and submit to the Division of Energy, Housing and Community Resources (DEHCR) all records required to document compliance with the Flexible Facilities Program (FFP). The grantee (local government or tribal government) may assign the duties to a designated grant administrator, who may be an employee or elected official of the local/tribal government or a contracted third party through a professional services firm or organization.

The grantee is responsible for ensuring that all financial and reporting requirements in the *FFP Implementation Handbook* and the executed grant agreement are met.

### 2.0 Responsibilities of Grantee & Designated Grant Administrator

The responsibilities of the grantee and designated grant administrator include the following:

- Prepare documents and facilitate the process to respond to DEHCR requests and requirements for the execution of the grant agreement and any subsequent grant agreement amendments.
- Ensure grantee compliance with all terms of the grant agreement and timely completion and/or submission of items listed in the timetable in Attachment A of the grant agreement.
- Ensure grantee compliance with all policies in the Bureau of Community Development *FFP Implementation Handbook* and federal and state regulations for the FFP program.
- Establish a file management system to comply with FFP program recordkeeping and monitoring requirements.
- Establish a financial management system to track and maintain documentation for FFP and match funding expenditures, receipts, and payments/disbursements.
- Ensure all contracting for the FFP project meets all applicable federal, state and local policy procurement requirements, following the guidance and requirements in Chapter 3: *Procurement & Contracting* of the *Handbook*; and maintain procurement and contracting documentation in the FFP project file.

- Ensure the grantee demonstrates efforts to encourage the disclosure and review of potential conflicts of interest prior to the execution of contracts; and maintain documentation of demonstrated efforts in the FFP project file.
- Ensure all companies/firms that are awarded a contract for the FFP project have signed a *Lobbying Certification* form and *Disclosure of Lobbying Activities* form (if applicable) (which are Attachments provided for Chapter 3: *Procurement & Contracting* of the *Handbook*); and maintain copies of the completed forms in the FFP project file.
- Ensure debarment checks are conducted on [SAM.gov](https://www.sam.gov) to verify no companies/firms awarded contracts in connection with the FFP project are debarred and maintain the [SAM.gov](https://www.sam.gov) records in the FFP project file.
- Ensure compliance with all applicable federal, state and local environmental regulations and requirements for the FFP project, including completing all required environmental related activities, document preparation and submissions, and responding to federal, state and local agency/entity requests.
- Ensure compliance with all federal and state acquisition and relocation regulations and requirements applicable to the FFP project and maintain recordkeeping on the *Acquisition/Relocation Monitoring Checklist* (an Attachment provided for Chapter 5: *Acquisition and Relocation* of the *Handbook*).
- Ensure compliance with all fair labor practices and standards applicable to the FFP project as listed in Chapter 7: *Labor Standards* of the *Handbook*.
- Ensure the project site signage at the construction site is compliant with specifications in the associated *FFP Project Construction Site Sign Specifications* document (an Attachment for Chapter 7: *Labor Standards* of the *Handbook*).
- Ensure all activities at the project site are part of the scope of work in the grant agreement.
- Prepare and compile payment request documents, e.g., *FFP Payment Request* form, *Cash Control Register* and *FFP Disbursements Journal*, and *Matching Funds Journal* (for which templates are in the Attachments for Chapter 8: *Financial Management* of the *Handbook*); and invoices, payment receipts, copies of processed checks, bank statements, etc., for the grantee's official review and approval; and submit a completed *FFP Payment Request* form and the supporting documents to DEHCR in accordance with the terms of the grant agreement and the guidance and requirements in, and accompanying attachments for, Chapter 8: *Financial Management* of the *Handbook*.
- Prepare reporting documents, e.g., quarterly reporting documents and annual *Single Audit Statement* (for which templates are in the Attachments for Chapter 9: *Reporting* of the *Handbook*), for the grantee's official review and approval; and

submit completed reports in a timely manner in accordance with the timetable in Attachment A of the *Grant Agreement* and Chapters 6, 7 and 9 of the *Handbook*.

- Ensure timely submission of the grantee's *Single Audit Report* (completed by the independent financial auditor(s)) to the Federal Audit Clearinghouse (FAC) and submitting to DEHCR a copy of the record from the FAC website verifying the grantee's *Single Audit Report* submission, as applicable, on an annual basis, as listed in the timetable in Attachment A of the grant agreement and in accordance with the terms in Chapter 9: *Reporting* of the *Handbook*.
- Organize files, compile documentation, and respond to requests from DEHCR during the monitoring process, including preparing the *Self-Monitoring Checklist* (Attachment FFP-02-01 for this chapter) the *Acquisition/Relocation Monitoring Checklist* (an Attachment provided for Chapter 5: *Acquisition and Relocation* of the *Handbook*), and the official response letter to the monitoring report for the grantee's official review and signature (if applicable); and ensure submission of monitoring documentation requested by DEHCR in a timely manner. Follow the guidance in Chapter 5: *Acquisition and Relocation* of the *Handbook*.
- Prepare the *Project Completion Report* (Attachment FFP-10-01 for Chapter 10: *Project Completion* of the *Handbook* and all supporting documents for the grantee's official review and signature; and ensure timely submission of all completion related documents. Follow the guidance in Chapter 10: *Project Completion* of the *Handbook*.
- Submit the final *Financial Certification of Completion* and financial journals, bank statement(s), and any other supporting documentation required to finalize completion for the FFP project. Follow the guidance in Chapter 10: *Project Completion* of the *Handbook*.
- Maintain and review documentation for all aspects of the FFP project on an on-going basis to ensure completeness.
- Respond to requests for information and documentation from DEHCR on an on-going basis throughout the FFP project performance period and following DEHCR issuing the *Project Completion Certification*, as necessary.
- Ensure the grantee has a complete FFP project file with all documents associated with the project upon completion of the project for records retention and to respond to any future open records requests by the public and document requests by state and federal entities for monitoring and regulatory purposes.

### 3.0 Recordkeeping

The grantee must prepare, keep, maintain and submit to DEHCR all records required to document compliance with the FFP program in accordance with the grant agreement and the *Handbook*. This may include all contracts relating to the implementation of the grant

agreement. Project records must be kept to confirm grant compliance during the project performance period, and the seven (7) years that follow. The records must be sufficient to demonstrate that the project costs incurred and FFP funds expended were in compliance with applicable American Rescue Plan Act of 2021 provisions, and the grantee is in compliance with [2 CFR Part 200.328](#) financial reporting requirements and [2 CFR Part 200.334](#) records retention requirements for federal grants, and [Wis. Stat. § 19.21\(4\)\(b\)](#) records retention requirements for local governments.

Per the terms of the FFP funding, the grantee must demonstrate that the facility constructed or improved with FFP funds and the related services made possible by the project, as specified in the grantee's FFP application, are sustained for five (5) years following the FFP project completion certification.

## 4.0 File Format

Generally, all files should be kept at the grantee's official location. All file documents that are required to be provided to DEHCR during and after the project performance period must be available and submitted in electronic format via email or another web-based system. Hard copies and faxed copies will not be accepted.

If the file storage system is in hard copy (i.e., paper) format, then the grantee must have scanning capabilities to convert documents to an electronic format via email or a web-based system when submitting them to representatives from DEHCR, Treasury and/or other regulating entities. The scanned/electronic versions of the converted documents must be clear and legible.

The grantee's electronic record-keeping system for the FFP project shall meet the following standards:

- The electronic system must be secure.
- Documents shall be stored on a network location protected with a password.
- Only designated personnel shall have access to the FFP project electronic data.
- The documents stored within the system must be made available to representatives of DEHCR, Treasury, and other state and federal regulating entities upon request.

Retaining the hard copies of the signed documents with the original signatures is recommended but not required. DEHCR and Treasury allow for all records retention for the FFP project to be in electronic form.

The grantee should maintain grant files and documentation included in the *Self-Monitoring Checklist* (Attachment FFP-02-01 for this chapter of the *Handbook*). If the grantee contracts with a third-party for grant administration services, they must ensure all of the project files are transferred to the grantee by the end of the project.

## 5.0 Grant Agreement

DEHCR will send the grant agreement to grant recipients for review and signature. The grant agreement will be based upon the application submitted by the grantee and contain the budget, scope of work, timetable, use of program income and commitment of additional funds, as stated in the FFP *Grant Announcement*, application form, and pre-agreement documents provided by the grantee. In addition, the grant agreement includes program terms and conditions to ensure compliance with state and federal requirements.

The grantee's Chief Elected Official (CEO) must sign and date the grant agreement. The signed grant agreement is fully executed upon both the grantee CEO and the State of Wisconsin Department of Administration authorized representative signing the document. An executed copy will be provided to the grantee.

DEHCR makes grant awards of specific dollar amounts for particular activities. If FFP funded activities are completed for a lesser amount than was originally budgeted, excess FFP funds may be recaptured by DEHCR.

## 6.0 Grant Agreement Amendments

Due to the nature of the FFP program, additional funding from Treasury is not anticipated and an extension to the timeline by Treasury is not likely. DEHCR may not accommodate certain amendment requests related to the project budget and timeline, regardless of justification. The grantee should contact the assigned DEHCR project representative prior to taking the time to prepare amendment request documents to determine if consideration is an option at that time.

If it is determined that an amendment is needed, it must be requested by the local CEO in writing **at least 30 days** prior to the grant agreement's performance period end date, and must:

- Be presented on the local or tribal government's letterhead;
- Include a detailed list of changes to the contract that the grantee is requesting (e.g., scope of work revisions, revised timetable, revised budget table, etc.);
- Include a brief explanation for why the amendment is needed and justification for the changes, including all factors outside the grantee's control that may have caused the need for the amendment;
- Be signed by the CEO; and
- Be submitted via email to the assigned DEHCR project representative.
- Amendment requests received by DEHCR **less than 30 days** prior to the grant agreement's performance period end date will be **ineligible** for consideration.

## 7.0 Monitoring

Per federal regulations, representatives from DEHCR and Treasury are required and authorized to review files and records associated with the FFP project. All FFP project files and documents must be made available/provided in electronic format upon request. Being monitored by DEHCR does not exempt a grantee from being monitored by Treasury and/or other entities of the State (e.g., Legislative Audit Bureau), and monitoring by DEHCR and/or Treasury may occur any time during the FFP project performance period or after project completion, until the seven-year (7 years) records retention period has ended.

### **IMPORTANT NOTICE!**

Monitoring of the grantee's project files can be performed by DEHCR and/or Treasury at any time until the seven-year (7 years) records retention period has ended.

## 8.0 Chapter Attachments

The attachment for Chapter 2: *Grant Administration* of the *FFP Implementation Handbook* is listed below. This form is available in a 'fillable' format on the *FFP Implementation Resources website* under the "Chapter Attachments/Fillable Forms" section.

ATTACHMENT FFP-02-01 SELF-MONITORING CHECKLIST