

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

FLEXIBLE FACILITIES PROGRAM IMPLEMENTATION HANDBOOK

CHAPTER 8: FINANCIAL MANAGEMENT



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CHAPTER 8: FINANCIAL MANAGEMENT

1.0 Introduction

Accurate financial record-keeping, including timely deposit, payment and accounting of Flexible Facilities Program (FFP) grant funds is crucial to the successful management of a FFP funded project. Grantees must take the following steps to develop a financial management system to receive grant funds:

- Appoint a person to be responsible for financial management and reporting tasks;
- Establish separate ledger accounts, and establish procedures to receive and disburse project funds;
- Establish paper and electronic accounting records; and
- Establish procedures for approving invoices, submitting claims, and issuing payments to vendors.

Financial record-keeping is a fundamental responsibility of the grantee's chief financial officer (CFO), such as the treasurer or clerk. The grantee's financial procedures must be consistent with Generally Accepted Accounting Principles (GAAP) and federal requirements described in this chapter.

The FFP grant agreement contains important information pertaining to financial management, grant expiration dates, and financial obligations of all participants.

No requests for grant funds will be considered by the State of Wisconsin Department of Administration (DOA) Division of Energy, Housing and Community Resources (DEHCR) until the grant agreement has been executed and the grantee has obtained an official approval of their Environmental Review from the DOA-DEHCR Environmental Desk (see Chapter 4: *Environmental Review* of the *FFP Implementation Handbook*). The grantee assumes full responsibility for the project costs, including payment of all project-related contracts executed prior to execution of the FFP grant agreement, unless the cost is otherwise deemed eligible for FFP funding in accordance with the guidance in this chapter.

2.0 Eligible and Ineligible Costs

2.1 Eligible Use of Funds

All use of funds shall be compliant with applicable provisions of the federal American Rescue Plan Act of 2021 ("ARPA") and the grant requirements. The grant requirements are specified within materials on the *U.S. Treasury Capital Projects Fund website*, the *FFP Grant Announcement*, and within this and other chapters of the *FFP Implementation Handbook*. Note that costs that may be listed as eligible under the CPF on the Treasury

website may not be eligible for the State of Wisconsin FFP funding. States were required to establish their own cost eligibility specifications for their CPF-funded program(s).

The cost principles of *2 CFR Part 200 Subpart E* (2 CFR Part 200.400 – 2 CFR Part 200.476), procurement and contracting requirements of *2 CFR Part 200 Subpart D* (2 CFR Part 200.317 – 2 CFR Part 200.327), and Wisconsin State statutes for public works construction, as listed in Chapter 3: *Procurement & Contracting* of the *Handbook*, are applicable to FFP projects. Refer to Chapter 3 of the *Handbook* for additional guidance.

For an FFP project to be eligible, it must meet each of the following criteria:

- include the construction, renovation, or expansion of a public library, community center, or other multi-purpose community facility;
- address a critical need that resulted from or was made apparent or exacerbated by the COVID-19 public health emergency; and
- invest in capital assets, digital connectivity equipment and devices and other technology, which provide new or improved access to broadband/Wi-Fi and directly enable work, education, and health monitoring.

If the project does not meet these criteria, with the facility being ‘operational’ and serving the intended beneficiaries by the end of the project performance period (**October 31, 2026**), the project costs may be deemed ineligible and the grant may be rescinded. This would require the grantee to return all or a portion of grant funds (to be determined on a case-by-case basis) to the State.

Eligible uses of funding include but may not be limited to:

- Building construction, renovation, and or expansion of public libraries, community centers, senior centers, and other multi-purpose community facilities;
- Demolition costs related to clearing a site or space for the FFP project;
- Acquisition of real property for the FFP project site;
- Relocation costs for persons displaced by the FFP project;
- Purchase of broadband/Wi-Fi access points, routers, repeaters and other devices, equipment and infrastructure for the community public facility;
- Computers, laptops, tablets, printers, and similar digital connectivity and computer devices and equipment [*Note: Licenses, subscriptions and other costs of operation and maintenance are not eligible.*];
- Furnishings directly related to and necessary for the implementation of the activities to meet the FFP project requirements of directly enabling remote access to work, education, and health monitoring;
- Architectural and engineering (A/E) services costs incurred for the FFP project **March 15, 2021, through October 31, 2026**; and
- Grant administration** and other non-A/E professional services costs incurred for the FFP project from the FFP award date of **October 7, 2024**, through the performance period end date of **October 31, 2026** [*excluding any grant application preparation and fundraising costs*].

****See “Grant Administration Costs” section within this chapter for requirements and restrictions.**

2.2 Ineligible Use of Funds Examples

Ineligible costs for Wisconsin’s FFP include but may not be limited to:

- Funds requested for expenses reimbursed from any other program;
- Funds used for acquisition of licenses, subscriptions, any other operating expenses;
- Leases;
- Costs to improve public and private K-12 schools and institutions of higher education;
- Payment of interest or principal on outstanding debt or other debt services costs incurred prior to award;
- Fees or issuance costs associated with issuance of new debt;
- Fees incurred in applying to the FFP;
- Taxes (except sales taxes on eligible expenses);
- Furnishings for portions of a multi-purpose facility that are not for directly implementing the programs/services designed to meet the goals and requirements of the FFP project (e.g., furniture for municipality’s government offices);
- Funding advocacy, collective bargaining, and lobbying activities;
- All costs incurred prior to **March 15, 2021** and/or after **October 31, 2026** (unless otherwise specified by DOA-DEHCR in the grant agreement and amendments);
- Costs for grant administration and other non-architectural/engineering (non-A/E) professional services for the project incurred prior to the grant award date;
- Costs for contracts, services, and other items (e.g., equipment, materials, supplies, etc.) that were purchased without compliance with the FFP procurement and contracting requirements; and
- All other uses specified as ineligible under ARPA.

3.0 Timing of Allowable Costs

No funds will be disbursed by DEHCR to the grantee for the FFP project until the grant Agreement is executed (signed by the grantee and DOA), the Environmental Review is completed and submitted by the grantee to DEHCR and certified by DEHCR, procurement compliance is verified, and the grantee submits an eligible, complete, acceptable FFP Payment Request form and supporting documents.

FFP project costs may be “incurred” and are allowable only after certain activities have been completed and are contingent upon the FFP funds being awarded and compliance with the FFP budgeting and procurement requirements. A summary of eligible activities based on when they are incurred and in relation to the grant award date, grant agreement execution date, completion and certification of the Environmental Review, and completion

of any applicable acquisition and relocation activities required for the project, are summarized in the table that follows.

Costs Allowed Prior to the FFP Award:	Costs Allowed After the Grant Award:	Costs Allowed after Grant Agreement is Executed, Completed Environmental Review (ER), Completed Acquisition/Relocation:
<p><i>Architectural/Engineering (A/E) costs:</i></p> <ul style="list-style-type: none"> A/E costs for the FFP project (excluding any FFP application preparation costs), starting 3/15/2021 through the grant performance period, are eligible for FFP payment or reimbursement, contingent upon the A/E costs being included as an FFP funded activity in the grantee's <i>FFP Project Budget</i> form and the grantee demonstrating compliance local procurement policies and the FFP competitive procurement requirements, specified in 2 CFR Part 200.320 (or requesting and receiving approval from DEHCR for non-competitive procurement for the A/E professional services) 	<p><i>Grant Administration costs:</i></p> <ul style="list-style-type: none"> Grant administration costs incurred after the grant award date are eligible for FFP payment or reimbursement, contingent upon the grant administration costs being included as an FFP funded activity in the grantee's <i>FFP Project Budget</i> form and the grantee demonstrating compliance local procurement policies and the FFP competitive procurement requirements, specified in 2 CFR Part 200.320 (or requesting and receiving approval from DEHCR for non-competitive procurement for the A/E professional services) If the costs are being paid with FFP funds, invoiced costs will only be paid or reimbursed after the grant agreement is fully executed and the Environmental Review process is complete/certified. 	<p><i>Acquisition/Relocation, Construction:</i></p> <ul style="list-style-type: none"> The property acquisition purchase/closing is to occur after the grant agreement execution and ER certification, if the costs are to be paid/reimbursed with FFP funds. If acquisition occurs prior to this, it may disqualify the entire FFP project and the grantee is responsible for the use of the property even if the site is deemed ineligible for the FFP project. DEHCR recommends the acquisition occur after the grant agreement execution and ER certification for <i>any</i> acquisition for a FFP project, regardless of funding source, when feasible, to ensure the property is eligible for the FFP project and the grantee is aware of the environmental implications of completing the project on the property. All property acquisition is subject to State and Federal acquisition/relocation requirements (refer to Chapter 5 of the <i>FFP Implementation Handbook</i>), regardless of funding source. Construction may begin after the grant agreement execution and ER certification, contingent upon the acquisition and relocation for the project site, if applicable, being completed. Starting construction prior to these activities may disqualify the FFP project. If construction <i>bidding or contracting</i> occurs prior to this, and the contract award is contingent upon the FFP grant agreement execution and ER certification, the grantee should inform the contractor(s) of this contingency when contracting. Some pre-construction costs such as <i>off-site</i> related pre-construction activities and materials/supply orders necessary to begin construction may be allowed prior to the grant agreement being fully executed but the grantee will be fully responsible for those costs in the event the project does not go forward (if the grant agreement does not get executed, the ER is not certified, and/or acquisition/relocation complications result in FFP funding cancellation)..
<p>Only costs associated with the approved scope of work as presented in the grant agreement and as listed in the FFP Project Budget form are eligible, and contingent compliance with the terms and requirements listed above; in the grant agreement; and the FFP Implementation Handbook.</p>		

“Construction” includes the building of a new structure/facility or making structural modifications to an existing building/facility space (including demolition, renovation, rehabilitation, and/or expansion) and installation or modification to the related infrastructure (e.g., utilities, fixtures, elevators, parking lots, sidewalks, drainage, etc.). These activities and the disturbance of the ground/land on which these activities will occur are considered “construction” activities.

- **Construction** activities and equipment/material/supply purchases and installation must be completed no later than **September 30, 2026**.
- No construction activities after this date will be funded with FFP funds, unless a grant agreement amendment is requested by the grantee and approved and executed by DEHCR.
- Refer to Chapter 2: *Grant Administration* of the [FFP Implementation Handbook](#) regarding the requirements and restrictions for grant agreement Amendments. **All other costs** are allowable through **October 31, 2026**.
- Program/facility services or activities that directly enable work, education, and health monitoring must be provided for at least five (5) years from the completion of the project.
- Grant administration and other professional services for the project may be eligible depending upon the timing of when the costs were incurred, the amount of costs (limits apply to grant administration), and compliance with FFP procurement and contracting requirements.

4.0 Grant Administration Costs

The amount of grant administration costs to be paid with FFP funds are to be specified in the grantee’s FFP Project Budget Form (which then is transferred to the FFP Payment Request form for the grantee’s project). The amount may be the greater of \$10,000 or two percent (2%) of the total grant award for the FFP project, up to (not to exceed) \$50,000. The cost eligibility is also contingent upon the grantee providing the required documentation to verify the costs were incurred for the FFP project and are reasonable (i.e., contractor invoices, or for work completed by the local/tribal government’s or subrecipient’s employees, a detailed itemization of costs, including hourly rates, dates, number of hours, and nature of tasks completed). Documentation is also required that verifies the grantee (and/or subrecipient) complied with local procurement policies when securing and contracting the services (if using a third-party), and the procurement process meets all other procurement requirements of the FFP.

No procurement process is required when the activities are performed by the grantee’s or subrecipient’s employees. Contracted professional services must be competitively procured in accordance with the guidance in [2 CFR Part 200.320](#), unless the grantee’s contracting for the services is with another government entity, a Wisconsin Regional Planning Commission (RPC, which qualifies as a quasi-governmental entity), or certain

non-profit, publicly funded Economic Development Organizations (EDOs); or the contract cost is no greater than \$10,000, which qualifies as a micro-purchase (refer to Chapter 3 of the *Handbook*). Any other exception requires the grantee to request approval from DEHCR for non-competitive procurement of the professional services. For consideration of an exception from DEHCR, the grantee must provide sufficient justification and demonstrate compliance with their own local procurement policies.

Indirect administrative costs and operational costs, as defined in 2 CFR Part 200.414 (a) and (b) are not eligible for FFP funding. This includes but is not limited to costs associated with general facility operations, maintenance and depreciation; and employee/personnel costs for operations, management, payroll, accounting, etc. (other than *direct* costs for activities involved with managing the FFP grant funds, which extend beyond an employee's regular responsibilities, such as the time required for preparing and submitting documentation for an FFP grant payment request to DEHCR). Note the direct administrative costs for grant administration, advertising procurement solicitations, legal services for FFP project related document reviews, etc., are only allowed if approved by DEHCR upon the grantee submitting the FFP Project Budget form and procurement requirements are met.

5.0 Requesting FFP Funds

5.1 Requirements for Non-Construction Costs

For the disbursement of FFP funds by DEHCR for the grantee's non-construction costs, the following documents are required:

- All applicable pre-agreement documents listed in the grantee's FFP award letter;
- Executed FFP grant agreement between the grantee and DOA-DEHCR;
- The subrecipient agreement between the grantee and the subrecipient organization, if a subrecipient is implementing the FFP project and receiving the grant funds as a 'pass through' from the grantee; and
- An *FFP Payment Request* form (issued by DEHCR to the grantee, customized for the grantee's FFP project)* that is completed accurately and submitted by the grantee to DEHCR, with the required supporting documentation for eligible costs incurred and payments made by the grantee. Two authorized approvers are to be entered at the bottom of the form for each payment request, who must be persons designated by the chief elected official (CEO) as authorized signatories on the *Signature Certification* form (Attachment FFP-08-01 for this chapter of the *Handbook*). The *Signature Certification* is submitted to DEHCR by the grantee during the pre-agreement process. If the designees change at any time during the performance period, the grantee must have another form

completed, signed by the CEO, and submitted to the assigned DEHCR project representative.

***NOTE: A customized copy of the FFP Payment Request form for the grantee's FFP project will be provided by DEHCR.** To request this form, the grantee is to contact the assigned DEHCR project representative after the FFP grant agreement has been executed, approximately 30-60 days prior to when the grantee is planning to submit the first request for payment.

5.2 Requirements for Construction Costs

For the disbursement of FFP funding for construction costs, the items listed above for "Non-Construction Costs" and the following documents are required to be submitted to the assigned DEHCR project representative:

- The FFP Environmental Review approval/certification letter issued by the DOA-DEHCR Environmental Desk (for the grantee's completed Environmental Report – refer to Chapter 4: *Environmental Review* of the *FFP Implementation Handbook*);
- Advertisement for bids with the affidavit of publication;
- Detailed bid tabulation summary; and
- The pre-construction meeting notes, if a meeting was held (recommended but not required).

*Once the grantee has received the *FFP Payment Request* form from DEHCR, and the applicable requirements listed above have been met, the grantee may request FFP funds in accordance with the executed grant agreement budget and *FFP Payment Request* form for the project.

The grantee must submit a copy of the following forms **each time** FFP funds are requested from DEHCR:

- A copy of the completed *FFP Payment Request* form (Attachment-08-02 FFP);
- An up-to-date *Cash Control Register* (CCR) (Attachment FFP-08-03);
- An up-to-date *FFP Disbursements Journal* (FFP DJ) (Attachment FFP-08-04);
- An up-to-date *Matching Funds Journal* (MFJ) (Attachment FFP-08-05); and
- Supporting documentation to verify FFP funded and match-funded eligible costs incurred and payments made (if applicable) to date (e.g., itemized invoices, itemized receipts, copies of processed checks/electronic funds transfers, bank account statements showing payments processed and/or the deposit and disbursement of previous FFP payments received (if applicable), etc.).

FFP funds will be issued by electronic funds transfer (EFT) (unless the grantee requests a paper check during the pre-agreement process). If the payment request is approved, the FFP funds requested will be electronically transferred (mailed as a paper check) directly to the designated financial institution for deposit into the **non-interest-bearing** bank account (*unless an exception is pre-approved by DEHCR, which may only be considered in rare, special circumstances*). As part of the pre-agreement documentation, the grantee must complete and submit the *DOA-6456 Authorization for Direct Deposit* form to receive FFP payments via EFT (or the *DOA-6457 Address Update* form for a paper check).

A FFP payment request to DEHCR must be for an amount of \$25,000.00 or greater. Exceptions to this must be requested by the grantee CEO and will be reviewed on a case-by-case basis. FFP funds may be requested in advance of the grantee's intended date of payment to contractors, but requested funds cannot exceed the total amount of applicable invoices received. This enables the grantee to use FFP funds for FFP payments rather than disbursing local funds and being reimbursed by the FFP program. If using the FFP funds to pay the invoices directly as received (rather than receiving a reimbursement from DOA-DEHCR for invoices previously paid), the invoices must be paid directly from the bank account in which the FFP grant funds are deposited by the State, and that account must be **non-interest-bearing**, without exception.

Grantees **may not** request FFP funds in excess of the amount shown on submitted invoices. FFP funds drawn must be disbursed within a reasonable period of time, defined as **within ten (10) business days** after the funds have been deposited into the grantee's bank account.

Matching funds must be kept in an account separate from FFP funds (or matching funds and FFP funds must be trackable using official separate account registers) and generally are to be spent concurrently with, and in proportion to, FFP funds. The grantee may earn interest on non-FFP (match) funds that are maintained in a *separate* account. Matching funds may be spent on any eligible activity project-related costs as specified in the grant agreement scope of work and budget table (Attachment A and Attachment B of the grant agreement). There is no minimum match requirement for the FFP but the grantee (and subrecipient, if applicable) is responsible for ensuring all project costs are paid and there is no duplication of benefits in paying cost. No cost paid with another external funding source (other than the grantee's or subrecipient's own funds or financing) is eligible to be paid or reimbursed with FFP funding.

6.0 Documentation for FFP and Match Funded Costs

6.1 FFP Funded Costs

Supporting documentation for FFP funds requested must be submitted to DEHCR with each payment request. This must include the CCR (Attachment FFP-08-03 for this chapter

of the *Handbook*), FFP DJ (Attachment FFP-08-04 for this chapter), and itemized invoices or itemized purchase receipts. Other supporting documents that are required if FFP payments have been received and/or the grantee has made payments to vendors for FFP costs include copies of the bank statements from the FFP account that show the deposit and disbursement dates and amounts for FFP funds received by the grantee from DEHCR; and copies of fully processed checks or copies of the initial checks issued by the grantee for invoices and purchases and accompanying bank statement(s) that show the checks cleared. The CCR is to report the deposit and disbursement of FFP funds to/from the FFP account for the project. The FFP DJ is to provide the details of vendors/payees, invoices, and payments made using FFP funding. The other supporting documentation must **clearly** identify the items for which FFP funds were/are going to be expended and should include the calculations made or brief descriptions to explain invoices that include work beyond the scope of work in Attachment A of the grant agreement (i.e., not project-related per the executed FFP grant agreement). Invoices paid with a combination of FFP and matching funds should include a break-down of funds being used from each source. Costs attributed to FFP expenditures, match expenditures, and ineligible expenditures are to be identified, as applicable. Non-project costs are ineligible for FFP funding and ineligible as a match cost.

FFP funding expenditures are to be listed on the *FFP Disbursements Journal* (FFP DJ) by budgeted activity, as listed on the *FFP Payment Request* form. Those amounts are drawn from the *FFP Project Budget* form (Attachment FFP-08-06) that is submitted by the grantee during the pre-agreement process and for any grant amendments pertaining to budget revisions. Each FFP budgeted activity is to be listed in a separate column on the FFP DJ.

6.2 Match Funded Costs

While the FFP has no minimum match requirement, the project costs paid with the grantee's and other match funding sources is to be documented and reported to DEHCR. This allows DEHCR to have records of the total cost of the project (which is reported to the U.S. Department of Treasury), and verification of all invoices and costs incurred for the FFP project being paid prior to issuing the Project Completion letter and certification. DEHCR also seeks to verify all costs and invoices for the project are being paid during the performance period and there is no duplication of benefits in funding disbursements by DEHCR and any other funding sources.* Supporting documentation for all match funds expended (e.g., itemized invoices and/or itemized purchase receipts, copies of fully processed checks and/or original checks and bank statements, etc.) must be provided with each payment request submitted.

All match expenditures are also to be reported on the *Matching Funds Journal* (MFJ) and submitted with the related supporting documentation and FFP Payment Request Form. When 100% of the project costs are paid with FFP funds only, the MFJ is still required, but

the entry may be “No Match Expended” in the “Payee & Invoices” column for each payment request.

**[Note: When the grantee is receiving match funding from other entities or programs, the grantee must maintain in the project file records of how the match funding from the other sources was applied to expenditures to ensure and to verify there is no duplication of billing of activities/expenditures among funding sources.]*

Match funding expenditures are to be listed on the MFJ as follows:

- list costs in separate columns for each budgeted activity that is listed on the FFP Payment Request form and/or FFP Project Budget Form (this is most appropriate when there are multiple funding sources and/or budgeted activities; or when the grantee is paying costs from separate accounts and seeks to maintain records of each type of costs, activity, and payment source separately); or
- list construction costs together in one column and have other costs such as engineering, grant administration, and/or acquisition/relocation related costs in other additional columns (separate from construction costs) (this is most appropriate when all match is being paid by the grantee and there is no need to record costs by individual construction category separately).

6.3 Unused FFP Funding and Allocation Changes

If there are cost savings on FFP funded activities that result in the grantee not expending all FFP funds awarded, the unexpended funds may be subtracted from the grantee’s award amount and reallocated to another FFP project. FFP funds may not be allocated for costs and amounts that are different than those listed on the grantee’s FFP Project Budget Form and FFP Payment Request Form without DEHCR’s prior written approval. A grant agreement amendment may also be necessary to change the funding category allocations. Considerations for allowing changes may include but are not limited to the time available to implement the change, the eligibility of the request and costs/changes proposed, the consistency of the change in relation to the grantee’s original scope and costs listed in their FFP application, and implications the changes may have had on the FFP application scoring if proposed by the grantee at the time of application submission.

7.0 Final Payment Request

The final request for payment must be submitted to DEHCR **in accordance with the timetable in Attachment A of the grant agreement**. Any FFP payment request received by DEHCR **after the final payment request submission due date (as stated in the grant agreement) is not eligible for payment**. Funds received from the final request must also be disbursed by the grantee within ten (10) business days.

IMPORTANT REMINDER!

FFP payment requests received by DEHCR *after* the final payment request submission due date specified in the timetable in Attachment A of the grant agreement **are not eligible** for payment.

Per the terms of the *grant agreement*, DEHCR withholds 10% of the total grant amount, up to \$25,000, until the *Project Completion Report* (Attachment FFP-10-01 for Chapter 10 of the *Handbook*) and supporting documentation and reporting have been submitted to and approved by the assigned DEHCR project representative. The final FFP payment request will generally be for no less than \$25,000, since that is the minimum amount for which funds may be requested from DEHCR. Any exception requires DEHCR approval and is reviewed on a case-by-case basis.

When submitting the ‘final’ FFP payment request, the grantee must check the “Yes” box on the “Final Request” line of the *FFP Payment Request* form.

After the grantee receives the final FFP payment, the grantee must submit the *Financial Certification of Completion* (Attachment 10-B for Chapter 10 of the *Handbook*) and supporting documents showing the deposit and disbursement of the FFP funds and payment for any invoice(s) that had not yet been paid as of the final *FFP Payment Request* submission date. Refer to *Chapter 10: Project Completion* of the *Handbook* for guidance.

8.0 Non-Compliance Implications

DEHCR reserves the right to **withhold any and all payment requests if the grantee is in non-compliance with any FFP requirements.** The issuance of payment may be held until:

- all project reporting requirements have been met;
- all supporting documentation for expenditures is submitted and verified as eligible, correct and complete; and
- all monitoring issues have been resolved.

DEHCR may terminate the *Grant Agreement* at any time (see applicable section of the *Grant Agreement*) as a result of non-compliance with the grant requirements and suspend all FFP funds at that time.

IMPORTANT REMINDER!

DEHCR reserves the right to withhold any and all payment requests until:

1. Reporting requirements have been met;
2. Supporting documentation indicating expenditures is submitted and verified; and
3. All monitoring issues have been resolved.

9.0 Program Income

The Grantee is required to track and report all program income for the project. Program income includes all funds generated as a result of or made possible by the FFP funding. This may include income and fees generated and collected for space use/rental, program, services, subscription, etc. offered in the space(s) created or improved through the use of the FFP funding. It does not include income and fees previously generated and collected at the project site prior to the FFP project implementation and income/fees for generated and collected for other spaces in the facility that have not been created or improved through the FFP funding. All fees charged in the space(s) created or improved with the FFP funding are subject to the program income requirements of [2 CFR Part 200.307](#). Program income generated by the FFP grant funding investments/FFP projects must be tracked, reported, and invested back into the FFP project site and facility improvements and tracked and reported to DEHCR throughout the FFP period of performance (ending October 31, 2026) and through December 31, 2026 (the end of the Program Income reporting period set by Treasury). In addition, the State and FFP Grantees are required to add program income to the CPF/FFP award amount pursuant to [2 CFR Part 200.307\(e\)\(2\)](#). Program income must be utilized and applied to benefit the same project from which it was generated.

10.0 Financial Accounts and Recordkeeping

The FFP funds must be maintained in a separate account or in a separate fund (with a separate account register) within an existing account. Detailed records of receipts and expenditures of grant funds must be maintained at all times. Records must be supported by source documents including (but not limited to):

- deposit receipts;
- itemized invoices;
- itemized purchase/payment receipts;
- copies of fully processed checks;
- bank statements; and
- contracts awarded.

- DEHCR has established recordkeeping requirements for FFP Grantees in accordance with *2 CFR Part 200.328 financial reporting and 2 CFR Part 200.334 records retention requirements* and consistent with *Wis. Stat. § 19.21(4)(b)* records retention specifications for local governments.

Records must be retained in accordance with the specifications of Chapter 2: *Grant Administration* of the *Handbook*. As required by federal regulations, this system of recordkeeping must be sufficient to facilitate fiscal reviews and audits of grantees.

11.0 Chapter Attachments List

Attachments for Chapter 8 of the *FFP Implementation Handbook* are listed below and available in editable or ‘fillable’ format on the *FFP Implementation Resources website* under the “Chapter Attachments/Fillable Forms” section. The grantee is to obtain the *FFP Payment Request* form by requesting it from the assigned DEHCR project representative for their project after the grant agreement has been executed. Refer to guidance provided earlier in this chapter.

ATTACHMENT FFP 08-01:	SIGNATURE CERTIFICATION FORM
ATTACHMENT FFP-08-02	FFP PAYMENT REQUEST FORM (EXAMPLE)
ATTACHMENT FFP 08-03:	CASH CONTROL REGISTER (CCR) (TEMPLATE)
ATTACHMENT FFP-08-04:	FFP DISBURSEMENTS JOURNAL (FFP DJ) (TEMPLATE)
ATTACHMENT FFP-08-05:	MATCHING FUNDS JOURNAL (MFJ) (TEMPLATE)
ATTACHMENT FFP-08-06:	FFP PROJECT BUDGET FORM

12.0 Chapter Revision History

12/12/2024:

- Original Chapter released.

1/31/2025:

- Page 10 – Added guidance pertaining to exception to the non-interest bearing account requirement.