

**U.S. Department of Health and Human Services
Health Resources and Services Administration**

Webinar

**“Sub-Recipient Monitoring for the Affordable Care Act (ACA) Maternal, Infant and Early
Childhood Home Visiting Program”**

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Transcript

Lisa King: Hello, everyone. I hear people joining by phone. My name is Lisa King, and I'm with the maternal and child health bureau's division of maternal infant and early childhood home visiting systems. Thank you for joining us today on this webinar on Sub-Recipient Monitoring for the MIECHV Program. Joining me today is Tammy Brown she is also with the division of home visiting and early childhood systems. Stephanie Sievel who is with HSRA's division of financial integrity and Mickey Reynolds who is a grants management specialist.

We are doing this webinar today in response to a lot of grantees questions regarding sub recipient monitoring. We have tried to tailor this as best as possible for everyone's needs. Because a lot of the decisions around a lot of the issues and questions around sub recipient monitoring are somewhat individual, we won't be able to take questions today during the webinar. However, we will provide you with an email address at the end of the webinar for you to submit your questions at the end and we will try our best to respond to them as soon as possible. Without further ado, I am going to turn it over to Stephanie.

Stephanie Sievel: Thank you, Lisa. I just want to thank you guys for having me here today to talk to you about sub-recipient monitoring as it relates to the maternal

infant and early childhood home visiting program. Today as Lisa mention, with the help for my colleagues in the division of home visiting and early childhood systems Tammy Brown and Lisa King and also my colleague in the division of grants management Mickey Reynolds we're going to talk to you about sub recipient monitoring. So as you can see on this overview slide some of things that will discuss are the compliance requirements will talk about definitions which are important so that you guys can understand the requirements. Those definitions will include subaward, sub-recipient, contractor and pass-through entities. We'll also talk a little bit about 45 CFR 75 and in particular how it relates to sub recipient monitoring and the requirements of pass-through entities. We'll talk about the MIECHV sub recipients and also how some recipient monitoring is defined in the funding opportunity announcement. We'll also address some best practices and examples and at the end of our webinar today, we'll go over some pre-submitted questions and answers. I want to say ahead of time thank you for anyone who submitted the questions to us. We have answers for you. For anyone else that has questions during the webinar, there is a email address at the end if you submit them, we can try our best to get back to you in a reasonable manner.

So first today we will talk about the compliance requirement. The Code of Federal Regulations provides administrative requirements, cost principles and audit requirements for the federal awards. As you can see on the slide, effective December 26, 2014 2 CFR part 200 superseded the OMB circulars a 21 -- and also superseded the cost principles which you guys may have heard of before two CFR part 225 and CFR part 230. Effective now 2 CFR 200 is a requirement for all federal awards. This is then codified for specific Department of Health and Human Services awards at 45 CFR part 75. This is where all your HSRA MIECHV grants fall under. As mentioned we will go into some definitions which are important for you guys to know when implementing sub recipient monitoring. The first I will talk about is subaward. Subaward this is a definition that comes directly from 45 CFR 75.2. It is a little confusing but I will read it for you. A subaward is an award provided by a pass-through entity to a sub recipient for the sub recipient to carry out part of a federal award received by the pass-through entity. As you can see, it is a mouthful. Ultimately what this means is that HSRA provided money through a funding opportunity announcement to the state and local government or nonprofit and then that state and local government then awards funds to another non-federal entity who then becomes a sub recipient and that awarding of the funds to the sub recipient is what we call the subaward. Hopefully that is easier for you to understand. Just so you know, a subaward may be provided to any form of legal agreement, including an agreement that the pass-through entity considers a contract. This is important. You don't want to get caught up on the terms that your entity uses whether it be a contract, subaward, etc. You want to make sure that you understand what is behind

the subaward. If you are giving -- if you are paying a contractor, it is not a subaward.

The next definition is sub recipient. One of the things that you will see is a lot of these definitions are intertwined and they say the same thing to get the definitions across. This one reads a non-Federal entity that receives a subaward from a pass-through entity to carry out part of the federal program. This is almost verbatim what was on the definition of a subaward. It is not include an individual that is a beneficiary of the program. One of the things is a sub recipient may also be a recipient of other federal awards directly from Federal awarding agencies. That is important to keep in mind. After we go through these definitions, one of the things that we'll do is show you how it is applicable to your MIECHV award so all this language taken directly from the Code of Federal Regulations make a little more sense.

On to the next slide. A contractor. Typically you guys were used thing that word vendor now we are using contractor. A contractor is an entity that receives the contract. Seems simple enough. When we get into the definition of contract we have a legal instrument by which a nonfederal entity purchases property or services needed to carry out the project or program under a Federal award. This gets into more information on how it doesn't matter what you call the legal instrument that is used. It is what defines a contractor or a sub recipient that is really going to define whether you have a contractor and a sub recipient. If that doesn't make sense now, in a couple of slides we'll talk about it again.

The last definition that I have is pass-through entity. It is a nonfederal entity that provides a subaward to a sub recipient to carry out part of a federal program. You as a HSRA grantee if you provide a subaward or funds to another entity to carry out the MIECHV program, you are then the pass-through entity.

As I previously mentioned, with the new legislation been effective on December 26, 2014 there were some old terms that you were used to hearing and some new terms. On the slide I have put them together for you so you can see. One of the old terms was recipient and now it is defined as a pass-through entity. Recipient was often used when defining the sub recipient relationship. The recipient would receive the funds from the federal entity and the recipient would give the funds to the sub recipient. Now we no longer use that and we use pass-through entity. The next one is organization. What you see now is nonfederal entity. As an example, the state of Connecticut apartment of health would now be a nonfederal entity and not referred to as the organization. This is just in terms of the code federal regulation and the language that you will see within them.

The last one is vendor. We were used to seeing vendor but now we will use contractor. An example that would be a university who was engaged to do an evaluation study of the data system. That is now a contract there. Contractor is not a sub recipient.

So now what I'm going to do is I'm going to highlight some of the post-award requirements that are included in 45 CFR part 75.

As you can see 45 CFR 75.351 specifically talks about sub recipient and contractor determinations. It is a responsibility of the pass-through entity to determine if their disbursement made to another nonfederal organization is a contract or a sub recipient. When making that determination, what matters is the substance of the relationship not the terms of the agreement.

So you can see on this slide what I have for you is what makes a sub recipient. In this case, sub recipients receive subawards and this occurs when a federal assistance relationship is formed between the pass-through entity and the other nonfederal entity. A sub recipient is formed by a subaward creating a federal assistance relationship. On here I have some of the characteristics that create this federal assistance relationship. They occur when the pass-through entity has determined who was eligible to receive what federal assistance. When the pass-through entity has performance measurements in relation to the federal program. When the pass-through entity has responsibility for programmatic decision-making. When the pass-through entity is responsible for adhering to specific program requirements so in this case a specific MIECHV requirements. Also number five is it says it uses a federal funds to carry out a program for a public purpose specified in authorizing statute as opposed to providing goods or services. This is really that distinction that I know used to confuse people based on a vendor, a contractor or sub recipient. These characteristics are what help you to define sub recipient.

Onto the next slide what I have for you is what defines contractor. Contractors on the other hand receive contracts and a contract occurs when there is a procurement relation formed. So similar to how we had the characteristics of the last slide I have the characteristics of the procurement relationship. It is when the contractor provides the goods and services within normal business operations. When they provide similar goods and services to many different purchasers. When they operate in a competitive environment. Provide goods or services that are ancillary to the operation of the federal program. A contractor is not subject to complaints requirements of the federal program as a means of the agreement. It is important to remember not to let the terminology confuse you. As a state, you may call legal agreement a contract but the relationship might mean that it is a sub recipient. Just going back to what

we said it is determination of you as a pass through entity to determine whether you have a contract with the contractor or subaward with the sub recipient. One of the things that I encourage is that all of you make sure you go back to 45 CFR part 75.351 and read through this and make sure that you understand what this means of that your entity can properly determine whether you have a sub recipient or contractor.

Onto the next slide what I have for you is some brief requirements for pass-through entities. I did not include every requirement so I do recommend that you go through and read the section as well. This is 45 CFR part 75.352. If you read through this part, you will be able to see all the requirements. I'm just going to highlight a couple.

Pass-through entities must clearly identify the sub recipient as a subaward. They must ensure that the sub recipient knows that they are required to adhere to the federal statutes and regulations including the terms and conditions of the award. They should be imposing additional requirements on the sub recipient in order for them to meet reporting requirements. Also they should require that the sub recipient permit the pass-through entity to assess their records and financial statements when needed.

Just continued on to the next slide. The pass-through entity must also evaluate the sub recipient's risk of noncompliance. They must monitor activities of the sub recipient to ensure that it is used for authorized purposes only. They should verify that the sub recipient is audited and they should also consider taking enforcement action against noncompliant sub recipients. These are just a few. I highly encourage that you guys familiarize yourself with this in order to make sure that your entity is compliant with sub recipient monitoring.

An additional item that I did want to state that's important is that a Federal awarding agency such as HSRA may require additional sub recipient guidance -- monitoring guidance on top of the Code of Federal Regulations. This is allowed as long as it does not conflict with the guidance that you will see here. That is something to keep in mind to look out for in the funding opportunity announcement and the notices of Grant award and any other legal documents because they might have additional regulations regarding sub recipient monitoring that you may need to comply with.

So just onto the next slide what you can see is there is a flow down chart that I just put together to make it easier for you to see how the money flows to the sub recipients. We have the Federal awarding agency which we have on the flight as HSRA. Provides funding to the pass-through entity which is and state or nonprofit in the MIECHV case and the state or nonprofit provides a subaward to the local implementing agency. That is --

that is subaward relation then creates a local implementing agency as a sub recipient. That sub recipient our local implementing agency is then responsible for implementing the home visiting program. Back to that definition where it says they are responsible for implementing the federal award requirements.

Just to reiterate again a subaward does not include payments to a contractor and it does not include payments to an individual who is a beneficiary of the program. Therefore, these individuals are not sub recipients.

Now I will go ahead and hand it over to Lisa who will discuss sub recipient monitoring per the funding opportunity announcement.

Lisa King:

Thank you, Stephanie. Per the HSRA MIECHV funding opportunity announcement - the last one that you are received - a subaward is a legal instrument to provide support for the performance of any portion of the substantive project or program for which you receive this award and that you as the recipient award to an eligible sub recipient. Recipient must monitor sub recipients. We need you to please note that contracting and subcontracting is allowable under this program. However, sub granting is not allowable. This language is taken directly from your FY 2015 FOA.

Applicants are responsible for ensuring that their organization or institution has in place an established an adequate procurement system with fully developed written procedures for awarding and monitoring all contracts. Applicants must provide a clear explanation as to the purpose of each contract, how the costs were estimated, and the specific contract deliverables.

Recipients must notify potential sub recipients that entities receiving subaward's must also be registered in the SAM – System for Award Management - which is a federal contractor Registry and makes them qualified to bid for and accept federal work and provide the recipient with their DUNS number.

Any grantees receiving federal funding is required to monitor sub recipient performance for compliance with federal requirements and programmatic expectations. This piece is very critical. Applicants must demonstrate how they will effectively manage sub recipients of MIECHV finding an effort to guarantee success of the MIECHV program, including annual site visits of all sub recipients. Effective management of MIECHV sub recipients will ensure enrollment and retention of eligible families and home visiting services, comprehensive evaluation of home visiting models, and proper spending of funding. I would really highlight all of these points because those are things that identified -- that are identified on some DFI audits.

Per the FOA you must provide a comprehensive description of your plan to effectively monitor sub recipients to ensure program success. Any grantees or sub recipient receiving federal funding is required to monitor for compliance with federal requirements of programmatic expectation. This description should include the process you used to monitor sub recipients program management, including tracking of families enrolled and retained compared to stated contractual goals. And sub recipients spending of funds. Monitoring activities are expected to include annual site visits of all sub recipients. The description that you should include should include all the tracking and monitoring entities are expected to include annual site visits of all sub recipients. I just wanted to emphasize that. I will turn it over to Tammy and she will provide you with a couple of examples where these apply.

Tammy Brown:

Thank you, Lisa. First of all I want to mention that I am a project officer and I am located in region eight. I was selected to states that have very good plans but also but I'm familiar with. I am sure there are a number of other grantees that also have very good plans and I would encourage you can consider sharing those plans with your fellow grantees and a way to do that would be the would be MIECHV group site. First of all I'm going talk about Colorado . Colorado has a four-part approach to monitoring program assessment and the provision of technical assistance. First on a monthly basis, they have grantees complete a report. That confirms staffing -- outlines challenges and Colorado reviews that and consolidates a report from all sites. They look for areas in concern and that information is provided to me as a project officer. We review the information during our routine grantee calls. Additionally, there are state intermediaries in the state of Colorado. These are representatives of each of the models that are being implemented. They are responsible for providing model specific monitoring and training including site visits to monitor performance and also provide technical assistance. These are very close partners of the state and the implementation of the MIECHV program. In addition, the Colorado health statistics and evaluation branch provides technical assistance and monitoring on data collection issues. This is a group of folks that work in the Colorado Public health and environment department and work very closely with the MIECHV grant to monitor data, the DGIS home visiting data submission. This allows Colorado to identify and correct data issues prior to the annual data submission to HSRA. From a fiscal standpoint Colorado Department of human services which is where the MIECHV program is located. The fiscal and management team have a very robust process to monitor each of the sites including on a monthly basis. Colorado provides an orientation and training to all grantees to review federal grant management requirements specifically MIECHV requirements. They provide training on federal fiscal rules, data collection

feedback and requirements, and also CDHS is finalizing a risk-based financial monitoring plan for desk reviews and annual site visits.

I'll move over to Kansas. The Kansas Department of Health and Environment home visiting program manager is responsible for managing and monitoring contractual agreements, expenditures, and sub recipient performance. From a contract and fiscal monitoring standpoint, sub recipients are required to submit affidavits of expenditures or invoices at least quarterly. The program manager reviews and approves expenditures for payment and follows up on any concerns such as needed documentation, unusual or unallowable expenses, and errors. All expenditures are entered and tracked on a spreadsheet for each MIECHV contracting grant. The program manager receives and reviews monthly financial reports from the fiscal staff indicating all process expenditures and total obligated and unobligated funds. The submitted affidavits and invoices, the tracking spreadsheet, and the financial reports are all reconciled.

In addition, the program manager regularly assesses contracts in regard to expenditures for the specific -- specified MIECHV grant funds and project period and it communicates with sub recipient agencies regarding their current and projected status of spending funds and any related challenges or concerns. From a programmatic performance monitoring standpoint, the program manager meets regularly with each local MIECHV team at which time the local implementing agency verbally reports -- report and discuss program progress and challenges. Including numbers reached and enrolled. Sub recipients are required to submit a semi annual narrative program activity and progress report which addresses their contractual scope of work. The home visiting programs submit required benchmarks, demographic and service delivery data on a quarterly basis. The narrative and data reports are reviewed and the program manager or designated contracted technical assistance provider follows up to address any questions or concerns with individual the contractors.

Finally under performance monitoring the program manager maintains regular communication with the Early Head Start, Healthy Families America, and Parents as Teachers state program leaders which includes verification that sites are in compliance with state and national model specific requirements and guidelines. As it pertains to site visits, the program manager will establish a schedule of annual site visits with each sub recipient. A site visit tool will be developed to consistently review various contractual, fiscal, and programmatic management items. For the evidence-based home visiting programs, these procedures may incorporate some monitoring documentation and visits performed by the Early Head Start, Healthy Families America, PAT state or national program agencies.

Stephanie Sievel: Thank you. Now we are going to talk about the purpose and requirements of sub recipient monitoring. Just onto the next slide, the purpose of monitoring is to ensure that sub recipients are meeting programmatic, legislative and reporting requirements. The MIECHV legislation further includes this by stating that the program must monitor the fidelity of the program implementation to ensure that services are delivered pursuant to the specified model. So some examples that we have of sub recipient monitoring include that the recipient or pass through entity should reconcile sub recipient budget expenditures to actual expenditures, they should perform site visits to review both financial and programmatic operation which we had some specific examples that Tammy just provided to you guys. Also offering technical assistance where needed and tracking any report submission. Pass-through entity should monitor through written policies and procedures they should have a monitoring schedule for site visits a monitoring checklist and a risk assessment. Now while all of these are suggestions, they are ways to help improve sub-recipient monitoring.

Some additional tips that we have for monitoring as highlighted at the beginning of the presentation when we talked about the Code of Federal Regulation and the requirements for sub-recipient monitoring in there. We do have that it is important and required that the pass-through entity make sure that the sub-recipient has submitted their audit report if necessary that they follow-up any reports are due and also they take any corrective actions that are needed. This is just another way to reiterate that. The sub recipient --if they have any deficiencies it is the responsibility of the pass-through entity to make sure that they are monitoring and making sure that those deficiencies are being corrected.

The key to monitoring is always documentation. You should make sure that you have documented policies and procedures for monitoring, maintain a documented file on each sub-recipient, make sure that you schedule, perform and document the site visits. These are both true for fiscal and programmatic sub recipient monitoring. If you have any corrective action plans, make sure that those are documented. Make you retain any audit reports and maintain all monitoring records that you have. Just as a reminder the record retention policy is three years after submission of the final Federal financial report. Keep that in mind that also includes all sub-recipient records.

Now I'm going to turn it over to Mickey Reynolds from the division of grants management and she will talk more about sub recipient reporting requirements.

Mickey Reynolds: Hello. I am going to talk about some the reporting requirements for the federal funding of accountability and transparency act we call FFATA. It was instituted in 2006. The information that I'm going to read is on the

slide is actually on every notice of award that has been sent to you since 2010 or 2012. Any award which you have received which has money on it which you receive funds, should have this term listed on it. As required by the FFATA public law 109-282, as amended by section 6202 of Public Law 110-252, recipients must report information for each subaward of \$25,000 or more and federal funds and executive total compensation outlined in appendix A to 2 CFR part 170. The website is very helpful and useful. It has frequently asked questions, it has a chart. The chart that Stephanie did was great. That chart should supersede what is on the website. It explains the purpose of the transparency act and how you can look up information on it. Please go to that. There's a lot of information there. The FFATA reporting requirements apply for the duration of the project period and so include all subsequent award actions for HSRA grants and for non-competing continuation sub awards to individuals are exempt from these requirements.

This is reporting subaward's which is what we are talking about today. You must report each action the obligates \$25,000 or more in federal funds that does not include recovery act funds. The home visiting program is part of the affordable care act. So none of these grant that we are talking about today fall under the recovery act. So we do have to report. They are not recovery act grants.

I'm going to be very brief because there is a lot of information on the website. Who is required to file the report in FFATA subaward reporting system? That is what is called FSRS a prime grant awardee will be required to report on it subaward. What to report? Basic information on first-tier subaward's of \$25,000 or more reflecting HSRA federal funds.

Where to report? The FFATA award reporting system and the website is on the screen is a reporting tool federal prime awardees and prime grant recipients used to capture and report subaward data regarding their first-tier subaward to meet the FFATA reporting requirements.

Went to report? The prime awardee is required to file a subaward report by the end of the month following the month in which a prime recipient awards any subgrant greater than or equal to \$25,000. For example, if the obligation was made on November 7, 2010, the obligation must be reported no later than December 31, 2010.

Please direct all transparency act FFATA questions to the HSRA post award mailbox . The website is on the screen. Staff on the compliance team in DGMO are monitoring all the FFATA reporting submitted to the website each month for five data. Information Peapod related into the system that the grantee identifies as being incorrect and provide an explanation/update. Any issues that require that need to be brought to the

attention of the program officer or the grants management specialist will be sent to us from that team.

Now I'm going to talk about allowable and an allowable cost. For cost to be allowable under federal award it must meet the following general criteria: it must be necessary and reasonable for the efficient performance and administration of federal award, be consistent with policy, relations, and procedures and -- and apply uniformly to both federal awards and other activities in the government unit, and be allocable to the grant. Reasonable cost are reasonable in nature and does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Allocable means it pertains to the grant program. Across allocable to the federal award another cause objective if the goods or services involved are chargeable or assignable to the federal award or cost objective in accordance with relative benefits received.

I'm going to go over very few costs that we deal with and receive questions on quite frequently. Personnel labor charges - they are definitely and allowable costs. You have to charge the actual worker labor involved and not budgeted time. Charging budgeted labor is unallowable. The work must be documented and charges to federal awards for salaries and wages will be based on payrolls documented in accordance with general acceptance practices of the grantee organization and approved by a responsible official. These payroll documents must be signed by authorizing official and the employee. It is really important that like Stephanie said documentation is so important because when audits are done, they need to look at these records. This is a very hot topic with this program. I have some very good news to report today. -- about meals and food. They are allowable under certain circumstances. Under 45 CFR 75 part 432. What we are using now is the definition of conference. A conference is a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the nonfederal entity and is necessary and reasonable for successful performance under the federal award. Allowable conference costs paid by the nonfederal entity as a sponsor or host of the conference may include rental of facilities, speakers fees, cost per meal, and refreshments, local transportation and other items incidental to such conferences unless further restricted by the terms and conditions of the award. There are no restrictions on those awards pertaining to those. The additional circumstances when meals and food are allowable are such as a research study. Where specifically provided as part of the project or program activity and programs providing children's services. When an organization customarily provides meals to employees working late or overtime as part of their compensation package. As part of a per diem when you are in travel status. Under conference grant and we do not issue

any conference grants at this time. There are a couple little things that are important to remember about meals. You may charge food for working meetings at your project related conference to the HSRA award as long as the related expenses are reasonable, allocable, and allowable. Meals would be considered entertainment would not be allowable. Entertainment costs are defined as cost for entertainment including amusement, diversion of social activities, and any associated cost are unallowable. The purchase of alcoholic beverages with grants funds is unallowable. The grantee must exercise discretion and judgment and ensuring that conference costs are appropriate, necessary, and managed in a manner that minimizes cost to the federal award. Budgets with meal costs will be scrutinized to ensure that the cost are appropriate and necessary and may slow the award process. Whenever you have a specific question as it relates to meetings, meals, or food or any other grant related activity or budget items, please contact your program officer and grants management specialist who is listed on the notice of award.

Another topic that we received frequent questions on is incentives. They are allowable. There are a lot of caveats to this. If you are in doubt, please contact us and get the specific ruling on these. Incentive payments to volunteers or patients participating in a grants supported project or program are allowable. Incentive payments to individuals to motivate them to take advantage of grant supported healthcare or other services are allowable if within the scope of the approved project. We have to be very careful with these because for instance, if you are giving someone \$100 gift certificate to Walmart, there is a possibility they could purchase cigarettes or firearms with those funds. You have to be very careful what we do. Certificate to a baby store that is a different story because that is specific to the program. Please ask us before you do any of this because we will clarify it for you.

Promotional items are not allowed to charge to the grant. This is 45 CFR part 75.421. Unallowable advertising and public relation costs include the following: cost of promotional items and memorabilia including bottles, gifts and souvenirs. This is another tricky subject. Please contact us if you have any questions about this. I know you notice that if you request these types of items, we do question it and asked for clarification. That is all the grants related things I'm going to talk about but I'm going to interject one little item. It is very important. On the notice of award that when it out in March there was a reporting requirement that said you had to submit quarterly FFRs that requirement has been changed and we will be requiring yearly instead. We are in the process of changing the EHB and updating it and you'll be notified when those changes have been made. The good news is you don't have to submit quarterly FFRs this year ever. The first one will be due July 30, 2016. I just wanted to let everyone know

that. That is all I have to talk about. Stephanie, do you want me to talk about the common findings?

Stephanie Sievel: Just going onto the common findings. We get a lot of questions about what type of findings we have seen. With regards to the sub recipient monitoring, I included some of these findings for you guys. The first one is not having a documented sub-recipient monitoring plan. We've also seen if this is where monitoring occurred but there was just no documentation. So it needs to be twofold. You need to have a monitoring plan and you need to have it documented. As you guys have learned throughout the rest of this presentation, it is now a requirement from the funding opportunity announcement so if you don't already have a documented sub-recipient monitoring plan your entities should work towards creating one. The next one is we've seen a lot of findings where grantees did not monitor the detailed expenditures of the sub-recipient for allowability and allocability. One of the important things I just mention is that it is important that you as the pass-through entity ensures the sub-recipient is spending the funds in an allowable and allocable manner because if they're not you are responsible. So it is just as bad as if you spent the funds in an inappropriate manner. That is a finding that we see a lot so make sure that you do monitor those detailed expenditures.

Lastly, we've also seen some findings regarding not having executed contracts with sub-recipient. What I had said earlier is it doesn't need to be a contract in the way we define contract. It needs to be a legally sufficient agreement. So as long as you guys have that, you wouldn't be docked if you don't have what we call a contract or an agreement or subaward. It is more the substance than the words.

Just onto the last slide before we turn it over for the pre-submitted questions just a little recap on what we talked about today. We went over the compliance requirements, definitions as it relates the sub recipient monitoring. We talked about 45 CFR part 75 and those post award requirements that pertain to sub recipient monitoring and requirement of pass-through entities. We talked about MIECHV sub recipients and how sub recipient monitoring is coming up in the MIECHV opportunity announcement. Tammy was able to provide you with some best practices and examples. We provided you with some generic tips for monitoring and Mickey Reynolds was able to speak to you about the requirements of FFATA and provide you examples of allowable and unallowable costs and we wrapped it up common findings.

Just going on what we have done is taken pre-submitted questions only just because as Lisa mention at the beginning of this webinar the questions are very subjective and we just want to make sure that we get you the best possible answer we can. So if you have specific questions just make sure

that you direct them to your project officer, grants management specialist, and also to the email address we have for this webinar which subrecipient@hrsa.gov. So now I'll just turn it over to Lisa and Tammy.

Mickey Reynolds: I want to say something before we start this. I did receive two questions they are very specific. I can't give a general answer to them. I have communicated with the grantee specifically. There were some questions around food and meals which I have replied to. I would prefer to answer those questions individually because I can't give a general answer and I don't want to give out the wrong information. The questions I received about meeting and conferences, I will address individually with that person. If you have any more questions, please feel free to send them into the website and we will reply to you.

Lisa King: Thank you, Mickey Reynolds. That is what I was about to say. I think we can wrap it up. I want to thank everyone for participating. We had great participation today. If you have any further questions, please direct them to your project officer and/or your grants management specialist and they will be able to help you. Thank you. Have a great afternoon.

[Event Concluded]