READY

LOCAL GOVERNMENTS



THE APPALACHIAN REGIONAL COMMISSION

(ARC) is an economic development partnership entity of the federal government and 13 state governments focusing on 423 counties across the Appalachian Region. ARC's mission is to innovate, partner, and invest to build community capacity and strengthen economic growth in Appalachia to help the Region achieve socioeconomic parity with the nation.

ARC's "READY Appalachia: A Community Capacity-Building Initiative" provides direct technical assistance and funding to support four key pillars of economic development in the Region: Appalachian local governments, local development districts (LDDs), nonprofit organizations, and community foundations. The READY Local Governments training program is designed to help local governments in the Appalachian Region better apply for, manage, leverage, and implement federally funded projects to invest in infrastructure, business and workforce development, and other long-term solutions to improve the lives of residents.

The curriculum was created in partnership with GrantWorks and CO.STARTERS to provide a nine week virtual cohort-based training at no-cost to participants. While the content has been developed with local governments in mind, it is relevant to many types of organizations doing important economic development work in grant application development.



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COURSE 6

FINANCIAL MANAGEMENT

6



COURSE 6

FINANCIAL MANAGEMENT



AS YOU ARRIVE...

(10 minutes)

Building on your course and fieldwork from last week, please make note of the following so you are fully prepared for today's session.

- 1. After reviewing 2 CFR Part 200 (Uniform Guidance), do you have any remaining questions?
- 2. Were you able to complete your *Grant Administration Planning* worksheet? If not, where are you stuck? How can we help?
- 3. Did your local procurement policies cover everything in the 2 CFR Part 200? If not, what do you need to additionally address?
- 4. What are your biggest questions about financial management of federal grants?
- 5. Review your completed CO.STARTERS Canvas of your project. Has anything changed in the past week? If so, make updates.

CO.STARTERS Canvas



FINANCIAL MANAGEMENT 101

(30 minutes)

As we learned last session, one of the most vital aspects of administering a federal grant is handling the money correctly. You have been entrusted with tax dollars; you must demonstrate that you are spending them responsibly and in accordance with the grant objectives.

TELL A STORY

Financial record keeping is more than just a series of numbers—it's a narrative that documents the journey of a grant from inception to completion. It tells the story of how grant funds are managed, how resources are allocated, and ultimately, how the grant contributes to achieving its intended objectives and making a positive impact.

The numbers need to tell this story.

And to tell the story well, you must document everything.

Remember, financial management can make or break your grant. If you fail to spend the money correctly, you could have to pay it back or be prohibited from getting future grants. Do it correctly from the start.

While there's a lot that goes into it, financial management essentially entails three core activities:

- 1. Set up a system for tracking the money (any system).
- 2. Track the money (every single penny).
- 3. Document. Document (receipts, invoices, payments, cleared checks...).

FINANCIAL RECORD KEEPING

The single most important thing you can do to stay on top of your grant finances is to have a system for tracking your money. Good records make life easier when reports or audits are due. While there is no "right" system for keeping records, several tools can help.

The Old-Fashioned Way: For centuries, people kept track of business activities in "ledgers," i.e. notebooks where sales and payments were written down. Using a ledger requires commitment and discipline to ensure everything is written down in one location, in a timely manner. It also requires doing that pesky math by hand.

Software: Technology has come to the rescue of the math-challenged. A spreadsheet might be sufficient in the short run, acting as a "virtual ledger," but software specifically designed for grant accounting can also help. Accounting software makes generating reports and viewing your numbers in multiple ways as simple as a click of a button.

TIP:

If you aren't sure it needs to be documented, do it anyway. Never assume they'll know something, that you'll remember, or that even the same person will be involved throughout the project. Create a paper trail.

TIP:

Open a separate bank account for the grant as soon it is approved. Run all expenses and receive all payments through this dedicated account. A dedicated account makes it easier to track the money and will keep you out of trouble.

It doesn't really matter what system you use as long as you have a clear way to track grant funds. Whatever you chose, make sure you have a system for the following:

- Accounting: Choose a system capable of tracking income, expenses, assets, liabilities, and other financial transactions related to the grant.
- Chart of Accounts: Develop a detailed chart of accounts specifically tailored to the grant project. This chart should include separate accounts for grant funds, matching funds, indirect costs, and any other budget categories specified in the grant agreement.
- Budget Tracking: Monitor expenditures against budgeted amounts.
 This helps ensure that spending remains within budgetary limits and allows for real-time adjustments as needed.
- Documentation Management: Establish a systematic approach for organizing and managing financial documentation, including invoices, receipts, contracts, payroll records, and procurement documents. Maintain both digital and physical copies of all relevant documentation for easy retrieval and audit purposes.

ACTIVITY: Financial Record Keeping

In your cohorts:

Which systems will you use to track grant funds? What do you already have in place to help? What additional systems will you need to implement?

FINANCIAL MONITORING + REPORTING

(45 minutes)

Financial monitoring of a federal grant refers to the ongoing process of overseeing and managing the financial aspects of the grant to ensure compliance with regulations, adherence to budgetary guidelines, and proper stewardship of grant funds. This monitoring process involves not only the activities aimed at tracking the funds, but also analysis and reporting on the financial aspects of the grant.

UNDERSTAND CONDITIONS FOR COMPLIANCE

One of the ways the finances must be analyzed is to make sure the funds were spent in accordance with the grant and federal law.

How do you know what's allowed? You guessed it!

You must familiarize yourself with the specific regulations and guidelines outlined by the federal agency providing the grant. These regulations typically include the Code of Federal Regulations (CFR), Uniform Guidance (2 CFR 200), and any specific terms and conditions outlined in the grant agreement.

TIP:

Follow general accounting practices, such as the person who approves the invoice being different than the person who signs the check.

TIP:

It's helpful to understand the distinction between supplies and equipment. Supplies tend to be consumable— used up (like paper)—whereas equipment can continue to be used past the life of the grant (like a printer).

KNOW IMPORTANT TERMS

As you're reading through the guidelines and your contract, there are several terms you need to understand.

Allowable Costs: Expenses that are directly related to the project or program outlined in the grant agreement and are necessary for its successful implementation. These usually include things like staff salaries, equipment, supplies, travel, services from consultants or contractors, and certain administrative costs. Your contract or the agency should outline what is "allowable."

Reasonable Costs: Expenses that are deemed appropriate and necessary for carrying out the activities outlined in the grant contract and reflect the fair market value for goods or services (what a "prudent" or "rational" person would pay). Ultimately, reasonableness is assessed based on the specific context of the project, industry standards, and applicable regulations. You must show your due diligence to prove that the cost was "reasonable."

Allocable Costs: Expenses that can be directly tied to a specific project or activity. It's a cost that is incurred solely because of the project and is necessary for its completion. In simpler terms, it's a cost that can be attributed or assigned to a particular task or purpose (think budget line item). Just because a cost is technically allowable and reasonable, doesn't mean it's allocable. It has to be in the budget.

Unallowable Costs: Expenses that cannot be charged to a federal grant or contract because it does not meet the criteria outlined in the grant agreement, federal regulations, or agency policies. If a cost isn't allowable, reasonable, AND allocable, it's unallowable. You cannot use grant or match dollars for it.

Indirect Costs: Expenses that are not easily attributable to a specific project but are necessary for the overall operation of the project, such as utilities, facility maintenance, and administrative overhead. These costs are typically calculated as a percentage of direct costs (budget line items) and are subject to negotiation with the federal granting agency.

SUBMIT FINANCIAL REPORTS

Your grant contract will outline what needs to be reported on and when. Although different agencies may require different forms, you need to be aware of SF-425.

SF-425 is a standard form used for financial reporting by recipients of federal grants and cooperative agreements. It is officially titled "Federal Financial Report" and is mandated by the Office of Management and Budget (OMB). The SF-425 form is used to report on the financial status of federal grant awards, providing detailed information on how grant funds were expended during a specific reporting period.

TIP:

Procurement processes like bidding or RFPs help establish that a cost is reasonable since you are comparing it to others in the market.

TIP:

Indirect costs will usually already be approved as a percentage in your budget. You can request a percent with each invoice until the entire amount is spent.

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ACTIVITY: Example SF-425

Take a look at the example completed SF-425. Jot down your own notes about what is required as we talk through each section.





Key features of the SF-425 form include:

Recipient Information: This section includes basic information about the grant recipient, such as the name and address of the organization, as well as the federal agency awarding the grant.

Federal Award Information: Recipients provide details about the specific federal grant or cooperative agreement being reported on, including the grant number, award amount, and award period.

Reporting Period: Recipients indicate the timeframe covered by the financial report, typically corresponding to a specific reporting period as outlined in the grant agreement.

Cash Transactions: The SF-425 requires recipients to report on cash receipts and disbursements related to the grant during the reporting period. This includes information on the beginning and ending cash balances, as well as any interest earned on grant funds.

Federal Financial Assistance: Recipients provide detailed information on the expenditures made using grant funds, broken down into expense categories such as personnel costs, fringe benefits, travel, equipment, supplies, and other direct costs. Additionally, recipients may need to report on indirect costs charged to the grant.

Recipient Share: If the grant requires a matching or cost-sharing contribution from the recipient organization, details of this contribution must be reported on the SF-425 form.

Remarks: Recipients have the option to provide any additional comments or explanations regarding the financial information reported on the SF-425 form.

It is important for recipients to accurately complete and submit the SF-425 form according to the reporting requirements specified in their grant agreements to ensure compliance with federal regulations and to maintain eligibility for future grant funding.

CONDUCT REGULAR REVIEWS

TIP:

Schedule check-ins with the entire grant team at regular intervals (either time-based or according to milestone) throughout the grant cycle. Put them on the calendar before you start spending money.

Even if you have a system established, it won't automatically get used properly every time. Most likely, multiple people will be working on your grant so it's important to create internal mechanisms to make sure everyone is aligned and that finances are properly managed.

Conduct regular internal reviews of financial records and reports to identify discrepancies, errors, or areas for improvement. Address any issues promptly and proactively to maintain the integrity of the financial record-keeping system.

Also, don't trust that the contractors have it right! Review every invoice thoroughly—line by line—to make sure it matches your budget before you pay it.

Remember, noncompliance has serious consequences. Regular checkpoints can keep you on track.

BUDGET AMENDMENTS + REVISIONS

(30 minutes)

Wait?! You can change the budget after it's approved?

Well, sort of.

You get what you get when it comes to a federal grant. The total amount approved is the total amount you will get. When you sign the contract, you've agreed to the budget as submitted.

With that said, sometimes an agency will allow you to alter how that total amount is spent.

For example, as anyone who has ever been involved in a construction project knows, unforeseen expenses arise. If unexpected costs arise during the project implementation that were not accounted for in the original budget, you may need to move money between line items to address the additional cost. This may mean foregoing another part of the project.

Any changes to the budget or scope of the project have to be approved through an amendment, modification, or revision. If it happens in the field, it has to also happen on paper. Because, at the end of the project, everything has to align or you're out of compliance.

While each agency will have its own process and forms required to revise a budget, requesting an amendment or revision involves several things.

- 1. Restate the original budget.
- 2. Outline the adjustments you would like to make and propose a new budget.
- 3. Justify your reasoning.
- 4. Include supporting documentation (like quotes, reports, etc.).

6.6 | Financial Management

The change must be approved BEFORE you perform the work.

If you perform the work before it's approved, it's considered an "at-risk cost." This means that it's possible the expenditure could be considered an ineligible use of funds.

If that happens, you'll need to assume the cost yourself and pay out of pocket.

ACTIVITY: Budget Amendments + Revisions

In your cohorts, discuss:

What sort of potential changes do you foresee as possible for your project? What sort of documentation will you need if you have to request a budget amendment?

GOVERNANCE OF MATCHING FUNDS

(15 minutes)

As we've previously discussed, managing match funding for a federal grant program requires careful planning, oversight, and compliance to ensure the proper utilization of funds and adherence to grant requirements.

A few tips can help you stay on track.

Be consistent. Match funds committed as part of your grant all have to follow the same compliance rules as other funds. The costs must be allowable, reasonable, and allocable. Make sure your funds are going to an approved expense. If you mess up and you have unallowable expenses, you can't use the match to cover them.

Document contributions. Maintain accurate records of all match contributions, including documentation of cash donations, in-kind contributions, and volunteer hours. Set up a system from the start and make sure everyone complies. This documentation will be essential for reporting purposes and demonstrating compliance with grant requirements.

Keep it simple. Although there is not a requirement to keep your match to a single line item, the simpler you make it, the easier it is to track and report. Keep this in mind when deciding where to use your matching funds.

Request it early. Particularly if you are planning on a cash match, request the funds early and have them in your dedicated bank account. This can prevent unanticipated delays in the future.

Matching Funds



ACTIVITY: Documenting Matching Funds

What system will you need to put in place to document your matching funds? Use the *Documenting Matching Funds* chart to capture your thoughts.

REQUESTING FUNDS

(30 minutes)

While it would be nice if your award letter came with a check for the full amount, federal grants don't work like that.

To access funds, you'll need to request them from the federal agency.

REIMBURSEMENTS VS. ADVANCE PAYMENTS

Grant payments come in one of two forms: advance payments and reimbursements.

Advance payments are provided upfront, before the grant recipient incurs expenses related to the project. These payments are intended to provide funds in advance to cover anticipated project expenses. Recipients use these funds to finance project activities and costs as they occur. Since advance payments are provided before expenses are incurred, recipients must carefully track and document how the funds are used. They may need to reconcile advance payments with actual expenditures later in the grant period.

Reimbursements, on the other hand, are given after expenses have already been incurred. Recipients spend their own money on project costs and then ask for reimbursement, providing proof of what they spent. Recipients must maintain detailed records of project expenditures and provide supporting documentation, such as receipts and invoices, when requesting reimbursement. The granting agency reviews these expenditures to ensure they are allowable, allocable, and reasonable.

Reimbursements are often favored by federal agencies because they reduce the risk to the granting agency by ensuring that funds are provided based on documented expenses. This approach also allows the agency to closely monitor how grant funds are being used, and ensures that funds are used for their intended purposes.

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FORMS SF-270 AND SF-271 - REQUESTS FOR FUNDS

SF-270 and SF-271 are forms used in the context of federal grants to facilitate the reimbursement process and reporting of expenditures.

SF-270 - Request for Advance or Reimbursement: This form is used by federal grant recipients to request reimbursement of funds expended for approved project activities. It serves as a formal request for payment from the granting agency. The SF-270 typically includes details such as the amount requested, the period covered by the request, the purpose of the expenditure, and supporting documentation, such as receipts or invoices. Recipients must submit the SF-270 according to the schedule outlined in the grant agreement or agency guidelines.

SF-271 - Outlay Report and Request for Reimbursement for Construction

Programs: The SF-271 is specifically used for construction-related federal grants. It serves a similar purpose to the SF-270 but is tailored to construction projects. Recipients of construction grants use the SF-271 to report project expenditures and request reimbursement from the granting agency. Like the SF-270, the SF-271 requires detailed information about the expenditures, including amounts, dates, and supporting documentation.

ACTIVITY: Example SF-270 + SF-271

Take a look at the example completed SF-270 and SF-271. Jot down your own notes about what is required as we talk through each section.

Example SF-270 + SF-271

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FORM SF-3881 - ELECTRONIC FUNDS TRANSFER

Form SF-3881 is a document used for setting up electronic funds transfer (EFT) payments for federal payments and collections. The form is titled "ACH Vendor/ Miscellaneous Payment Enrollment Form" and is specifically designed for vendors, contractors, and individuals who receive payments from the federal government.

Once completed and signed, the SF-3881 is submitted to the appropriate federal agency responsible for disbursing payments to the payee. It enables the agency to set up the necessary electronic funds transfer arrangements to ensure timely and efficient payment processing.

It's worth noting that while SF-3881 is commonly used for vendor and miscellaneous payments, there may be other forms or processes used for specific types of payments or situations within the federal government. Always refer to the instructions provided by the relevant agency or organization to ensure compliance with their requirements.

TIP:

Get payment forms completed and submitted as soon as you open the grant's bank account in order to prevent delays and speed up the receipt of funds.

FINANCIAL AUDIT REQUIREMENTS

(30 minutes)

A **financial audit** of a federal grant is an examination of the grantee's financial records and activities related to the grant to ensure compliance with the terms and conditions of the grant agreement, as well as with applicable laws, regulations, and accounting standards. In other words, it's like a thorough check-up on how an organization is using the money it received from the government. The audit is typically conducted by an independent auditor or auditing firm.

The audit aims to make sure that the grantee was compliant in how it spent the funds. It will detect any fraud, waste, or abuse in the use of grant funds and provide assurance to funding agencies, taxpayers, and other stakeholders that grant funds are being used efficiently, effectively, and in compliance with applicable requirements.

During a financial audit of a federal grant, the auditor will typically:

- 1. Review the recipient's financial records, including accounting ledgers, invoices, receipts, and other documentation related to grant expenditures.
- Test a sample of transactions to verify their accuracy and compliance with grant requirements.
- 3. Assess the adequacy and effectiveness of the recipient's internal controls over grant funds
- 4. Issue a report detailing the findings of the audit, including any instances of noncompliance or internal control weaknesses, along with recommendations for corrective action.

It's important for grant recipients to be prepared for financial audits by maintaining accurate and organized financial records, implementing effective internal controls, and staying informed about grant compliance requirements. Addressing any audit findings promptly and implementing corrective actions will help ensure continued eligibility for federal grant funding.

Remember, you'll need to keep documentation for a specified period of time, so be clear on what that is for your grant!

TIP:

Remember, always keep 2 forms of records—one printed (tangible, that you can hold in your hand) and one digital (backed up in the cloud).

Audit Readiness Checklist



ACTIVITY: Audit Readiness Checklist

To get ready for an audit, organize all your grant files by category. Think through what you will specifically need as we go over the *Audit Readiness Checklist* and take notes.

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Work with your team to figure out how financial records for grants will be kept and tracked. What system(s) will you use? Who will be responsible?
Finish filling out your <i>Documenting Matching Funds</i> worksheet and compare notes with your team. What do you need to develop or do to make sure it's done correctly?
Review the <i>Audit Readiness Checklist</i> . What items are areas of concern? What's your plan to address them?

NOTES:

OMB Number: 4040-0014 Expiration Date: 01/31/2019

Federal Financial Report (Follow form Instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted US Housing and Urban Development (HUD) 2. Federal Grant or Other Identifying Number Assigned by Federal Grant Other Identifying Number Assigned by Federal Grant or Other Identifying Number Assigned by Federal Grant Other Identifying Number Assigned by								
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j. Recipie	nt share of exp	enditures					10,000.00	
k. Remair	ning recipient sl	hare to be provided (line i m	inus j)				15,000.00	
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12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation: Add Attachment Delete Attachment View Attachment								
13. Certification: By signing this report, I certify that it is true, complete, and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil or administrative penalties. (U.S. Code, Title 18, section 1001)								
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d. Estimated net cash outlays	s for advance	50,00	0.00		100,000.00		500,000	3.00		050,0	0.00
period		50,00	0 00		100,000.00		500,000	2 00			00.00
e. Total (Sum of lines c & d)		30,00	0.00		•		100,000.00				
f. Non-Federal share of amou	unt on line e				25,000.00					-	00.00
g. Federal share of amount o	on line e	50,00	0.00		100,000.00		500,000	0.00		<u>650,0</u>	00.00
h. Federal payments previou		25,00	0.00		50,000.00		100,000	0.00		175,0	00.00
i. Federal share now request minus line h)	ed (Line g	25,00	0.00		50,000.00		400,000	0.00		475,0	00.00
j. Advances required by month, when requested	1st month										0.00
by Federal grantor agency for use in making	2nd montl	n									0.00
prescheduled advances	3rd month	,									0.00
12.	ora mona	ALTERNATE CO	MPUT.	ATION FO	OR ADVANCES	ONL	Y				
a. Estimated Federal cash ou	utlays that will	be made during period cove	ered by t	he advance					\$		
b. Less: Estimated balance	of Federal cas	h on hand as of beginning o	of advan	ce period							
c. Amount requested (Line a AUTHORIZED FOR LOCAL		TION	(Continu	ied on Revi	erse)	ST	ANDARD FORM 27	70 (Rev.	7-97)		0.00
				.=		Pr	escribed by OM	/IB Circ	culars A-10	12 and A	-110
13.		SIGNATURE OR AUTHORIZED C		RTIFICAT	TION			DATE (REQUEST		
I certify that to the booknowledge and belief the		SIGNATORE ON MUTHORIZED C	ER HE HIV	O OFFICIAL				SUBMI			
reverse are correct and that	at all outlays							Feb	ruary 21	, 2024	ļ
were made in accordance grant conditions or other		TYPED OR PRINTED NAME AND							HONE (AREA	1	
and that payment is due a	and has not	Jane Doe, Executive	e Dire	ctor				EXTEN	ISION)		
been previously requested.							555	-555-55	ა5		

	QUEST FOR REIMBURSEMENT CTION PROGRAMS	OMB APPROVAL NO.	PAGE 1	0 F 1	PAGES			
(See instru	uctions on back)	1. TYPE OF REQUEST	2. BASIS OF REQUEST CASH ACCRUAL					
3. FEDERAL SPONSORING AGENCY AND WHICH THIS REPORT IS SUBMITTED US Housing and Urban De		4. FEDERAL GRANT OR OTHER IDENTIFYING NUMBER ASSIGNED BY FEDERAL AGENCY (# from grant agr	5. PARTIAL PAYMENT REQUEST NO.					
6. EMPLOYER IDENTIFICATION	7. RECIPIENT'S ACCOUNT NUMBER	PERIOD COVERED BY THIS REQUEST						
IRS#	or identifying number (recipient assigned)	FROM (Month, day, year) 01/01/2024		T0 (Month, day, year 01/31/2024)			
9. RECIPIENT ORGANIZATION		10. PAYEE (Where check is to be sent if	different than item 9)					
Name: City of Township		Name:						
No. and Street: 1234 Anywhere St		No. and Street:						
City, State and ZIP Code: Township, KY	12345	City, State and ZIP Code:						

11. STATUS OF FUNDS							
PROGRAMS	FUNCTIONS	ACTIVITIES	TOTAL				
Administration	Engineering	Construction	TOTAL				
\$ 25,000.00	\$	\$	\$ 25,000.00				
			0.00				
			0.00				
	25,000.00		25,000.00				
			0.00				
			0.00				
			0.00				
			0.00				
			0.00				
		100,000.00	100,000.00				
			0.00				
			0.00				
			0.00				
25,000.00	25,025.00	100,000.00	150,025.00				
			0.00				
25,000.00	25,025.00	100,000.00	150,025.00				
25,000.00	25,000.00	100,000.00	150,000.00				
			0.00				
25,000.00	25,000.00	100,000.00	150,000.00				
			0.00				
\$ 25,000.00	\$ 25,000.00	\$ 100,000.00	\$ 150,000.00				
50 %	25 %	15 %	%				
a. RECIPIENT	SIGNATURE OF AUTHORIZED CER	TIFYING OFFICIAL	February 29, 2024				
		TELEPHONE (Area code, number, and extension) 555-555-5555					
	SIGNATURE OF AUTHORIZED CER	TIFYING OFFICIAL	DATE SIGNED				
b. REPRESENTATIVE	TYPED OR DOLLARS MANS (***	TI C	February 29, 2024				
CERTIFYING TO LINE 11V	John Doe, Secretary	ILLE	TELEPHONE (Area code, number, and extension) 555-555-555				
	PROGRAMS (a) Administration \$ 25,000.00 25,000.00 25,000.00 25,000.00 \$ 25,000.00 \$ 25,000.00 \$ 25,000.00	PROGRAMS FUNCTIONS	PROGRAMS FUNCTIONS ACTIVITIES				

GRANT CONTRACT FILES

- □ Grant Contract
- □ Amendments to the Contract (if applicable)
- □ Sub-recipient Contracts
- □ Submitted Reports
- □ Document Retention Policy

FINANCIAL FILES

- □ Financial Management Policies
- □ Budgets
- Invoices
- □ Receipts
- □ Proof of Payments

PROCUREMENT FILES

- □ Procurement Policies
- □ RFPs or RFQs
- □ Bid Documentation
- Quotes
- Contracts or Purchase Orders

LABOR FILES

- Labor Policies
- □ Job Descriptions
- □ Timesheets
- □ Payroll Records
- □ Personnel Policies + Procedures
- Contractor agreements

GENERAL POLICIES

- □ Civil Rights
- □ Conflict of Interest
- □ Other:_____
- □ Other: _____

CONSTRUCTION FILES (IF APPLICABLE)

- Constructions Drawings + Specifications
- □ Maps
- Permits
- □ Change Orders
- □ Materials Testing and Inspection Reports
- □ Daily Construction Logs
- □ Safety Records

ENVIRONMENTAL FILES (IF APPLICABLE)

- □ Environmental Impact Assessments
- □ Environmental Compliance Plans
- ☐ Environmental Monitoring Data
- Documentation of Mitigation Measures

ACQUISITION FILES (IF APPLICABLE)

- □ Property Acquisition Policies and Procedures
- □ Property Inventory
- Purchase Agreements or Contracts
- □ Evidence of Title or Ownership
- Appraisals and Valuations
- □ Property Inspections



