

FY24 ADECA UPDATES

- **SUMMARY OF CHANGES MADE TO FY24 SUBAWARD CONDITIONS**
- **MOVEMENT TOWARDS BETTER FISCAL RESPONSIBILITY**
- **CONTACTING ADECA**
- **PROGRAM UPDATES**



SUMMARY OF CHANGES MADE TO FY24 SUBAWARD CONDITIONS

In an effort to both strengthen and streamline our Subaward Conditions, we have added some new and some clarifying language to the Conditions.

The new language was added to further expand on our requirements while the clarifying language simply expands on what already exists in the Conditions.

Health and Human Services (HHS) Awards



THE DEPARTMENT OF HEALTH AND HUMAN SERVICES HAS CODIFIED THEIR OWN VERSION OF THE 2 CFR PART 200 CALLED THE 45 CFR PART 75.



REFERENCES TO THE 2 CFR 200 HAVE BEEN UPDATED TO THE RELEVANT PARTS OF THE 45 CFR PART 75.

Mandatory Disclosures

Existing Condition

Pursuant to 2 C.F.R. 200.113, the Subrecipient must disclose, in a timely manner, in writing to the Department all violations of Federal criminal law involving fraud, bribery, or gratuity violations.

Updated Condition

Pursuant to 2 C.F.R. 200.113, the Subrecipient must disclose, in a timely manner, in writing to the Department all violations of Federal criminal law involving fraud, bribery, or gratuity violations.

Failure to comply may result in the Department temporarily withholding cash payments pending correction of the deficiency, 45 C.F.R. § 75.371(i).

Access to Records

Existing Condition

The Director of the Department, the Comptroller General of the United States (if Federal funds), the Chief Examiner of Public Accounts, or any of their duly authorized representatives shall have the right of access to any pertinent books, documents, papers, and records of the Subrecipient for the purpose of making audits, financial reviews, examinations, excerpts and transcripts. This right also includes timely and reasonable access to Subrecipient personnel for the purpose of interview and discussion related to such agreement. This right of access is not limited to the required retention period but shall last as long as the records are retained.

Updated Condition

The Director of the Department, the Comptroller General of the United States (if Federal funds), the Chief Examiner of Public Accounts, or any of their duly authorized representatives shall have the right of access to any pertinent books, documents, papers, and records of the Subrecipient for the purpose of making audits, financial reviews, examinations, excerpts and transcripts. **Records of the Subrecipient include books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, canceled checks, and other related documents.** This right also includes timely and reasonable access to Subrecipient personnel for the purpose of interview and discussion related to such agreement. This right of access is not limited to the required retention period but shall last as long as the records are retained.

Conflict of Interest

Existing Condition

A conflict of interest, real or apparent, will arise when any of the following has a financial or other interest in the firm or organization selected for award: (1) the individual, (2) any member of the individual's immediate family, (3) the individual's partner, or (4) an organization which employs or is about to employ any of the above. The Subrecipient certifies by signing this agreement that no person under its employ or control who presently performs functions, duties, or responsibilities in connection with the Department of grant-funded projects or programs has any personal and/or financial interest, direct or indirect, in this agreement nor will the Subrecipient hire any person having such conflicting interest. The Subrecipient further certifies that it will maintain a written code of standards governing the performance of persons engaged in the award and administration of contracts and subawards.

Updated Condition

A conflict of interest, real or apparent, will arise when any of the following has a financial or other interest in the firm or organization selected for award: (1) the individual, (2) any member of the individual's immediate family, (3) the individual's partner, or (4) an organization which employs or is about to employ any of the above. The Subrecipient certifies by signing this agreement that no person under its employ or control who presently performs functions, duties, or responsibilities in connection with the Department of grant-funded projects or programs has any personal and/or financial interest, direct or indirect, in this agreement nor will the Subrecipient hire any person having such conflicting interest. The Subrecipient further certifies that it will maintain a written code of standards governing the performance of persons engaged in the award and administration of contracts and subawards. **The officers, employees, and agents of the Subrecipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to subagreements. Subrecipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the Subrecipient.**

Reporting Requirements

Updated Condition

The reports for the three different programs varies slightly. The most notable change for all programs is that reports are now due on the 15th of the month following the end of the quarter (CSBG) and on the 15th of month each month for Weatherization.

Schedule of Payment/ Method of Payment

Updated Condition

The wording for the three different programs varies slightly. The most notable change for all programs are:

- All cash advances will be limited to immediate cash needs, which we have defined as forty-five (45) days for each program. Any indication that Subrecipients are maintaining cash balances will result in the Subrecipient no longer being eligible for advances.
- The funds shall be paid by the Department upon receipt and approval by the Department of monthly expenditure reports detailing current expenditures and estimated expenditures for the next forty-five (45) days, subject to no finding of fiscal inadequacy.

Schedule of Payment/ Method of Payment

Updated Condition

- Subrecipients shall promptly remit to ADECA, the interest earned on advances. The Subrecipient may keep interest amounts up to \$500.00 **per year** for administrative expenses in accordance with 45 C.F.R. § 75.305(b)(9) and 2 C.F.R. § 200.305(b)(9).
- Expenditure reports are to be submitted in the form and under procedures prescribed by the Department, including summaries and supportive documentation, if requested.
- In order to expedite timely transmittal or advances to the Subrecipient, Monthly Expenditure Reports must be received by the Department not later than the 15th day of the month following the end of the month for which expenditures are reported.

Disallowed Costs

Updated Condition

The wording for the three different programs varies slightly. The most notable addition for all programs is:

- All other expenditures not meeting State, Federal, or local rules and regulations, guidelines, policies and procedures, and similar guidance may be disallowed.

Segregation of Costs

Updated Condition

This condition existed in CSBG conditions but has been added to the other programs' conditions:

- Financial and accounting systems should be revised as necessary to segregate, track, and maintain these funds apart and separate from other revenue streams. No part of the funds shall be commingled with any other funds or used for a purpose other than that of making payments for costs allowable with [insert program name] funds.

Site Visits

Updated Condition

This condition existed in CSBG and Weatherization conditions but has been added to the other programs' conditions:

- Authorized representatives have the right to make site visits at reasonable times to review project accomplishments and management control systems and to provide technical assistance, if required. The Subrecipient must provide reasonable access to facilities, office space, resources, and assistance for the safety and convenience of the government representatives in the performance of their duties. All site visits and evaluations must be performed in a manner that does not unduly interfere or delay the work.

Fidelity Bonding

NEW Condition

Subrecipients shall be required to carry fidelity bonds for individuals in positions of fiscal responsibility in the amount of \$250,000.00 or the highest cash advance.

MOVEMENT TOWARDS BETTER FISCAL RESPONSIBILITY

As funders, our role is to

- Secure funding from the Federal Government
- Administer the funding to our subrecipients
- Monitor for compliance to ensure that funds are being properly spent so that neither the State nor the subrecipient agencies receive findings requiring the remittance of funds

How ADECA Evaluates Monthly Expenditure Reports

In an email sent on October 2, 2023, the following points were addressed:

- We provided a basic checklist that Program Managers use each time we receive a Monthly Expenditure Report (MER). The checklist collects some basic information from the MER to ensure the MER can be sent to Accounting for processing.
- We discussed the concept of allocating shared expenses (a requirement per the CFR). In short, any shared expense should be appropriately and fairly allocated to all programs that benefit from the expense. If a certain program cannot pay their share of the expense, it is **not** permissible to charge their share to another federal grant. In this instance, the agency should decide what unrestricted funding source could be used to cover the deficit.

How ADECA Evaluates Monthly Expenditure Reports

- As outlined in the updated conditions, agencies should not request more funding in *Estimated Expenditures* than can reasonably be spent in the **45 days following receipt of the funding**. Excess funds may have to be returned if unused. Moreover, agencies should **not** use funds from one program to supplement another program, even if you intend to “pay the program back” once funds from the other program are received.
- Monthly Expenditure Reports (and other reports) will be **due on the 15th of the month** each month. Program Managers will begin sending reminder emails when MERs aren’t turned in on time.

Budgeting

Beginning next year, we plan to institute a budget process, whereby, we request a budget for the anticipated use of funds for each program. You will be asked to provide the following types of detail:

- Administrative –
 - Salaries: the names, titles, pay rates, pay frequency, and percentage of time on the grant for each grant-funded position
 - Fringe Benefits: a brief overview of the types of fringe benefits that will be requested through the grant (subject to each person's percent of time on the grant)
 - Other Administrative Expenses: a brief description of the expense and the allocation percentage so that we can determine allowability and reasonableness
- Programmatic –
 - Programmatic Expenses: a brief description of the expense and the allocation percentage so that we can determine allowability and reasonableness

CONTACTING ADECA

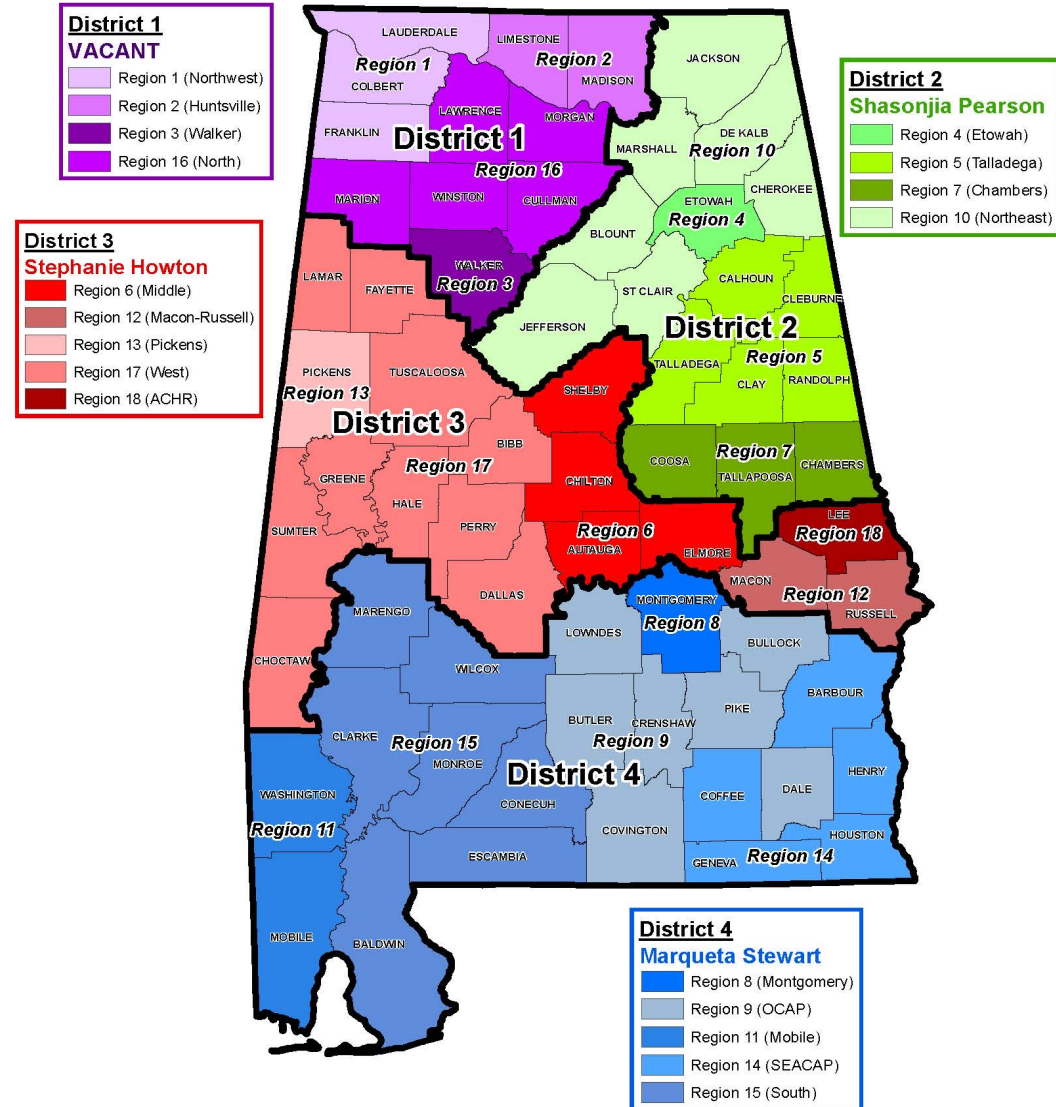
If you have questions/concerns regarding your grant, please contact your Program Manager(s) first. If you are able, please give them an adequate amount of time to respond or return your call.

If you need immediate assistance and cannot reach your Program Manager(s), please email or call your Program Supervisor for assistance.

CONTACTING ADECA

CSBG/LIHEAP

CSBG/LIHEAP District Map



Contacting ADECA: CSBG/LIHEAP



District 1:
VACANT

**CSBG Program Supervisor
Rhoda Talley**



District 2:
Shay Pearson

shasonjia.pearson@adeca.alabama.gov
(334) 353-4490

rhoda.talley@adeca.alabama.gov
(334) 242-5412



District 3:
Stephanie Howton

stephanie.howton@adeca.alabama.gov
(334) 242-4362

**LIHEAP Program Supervisor
Wendy Littles**



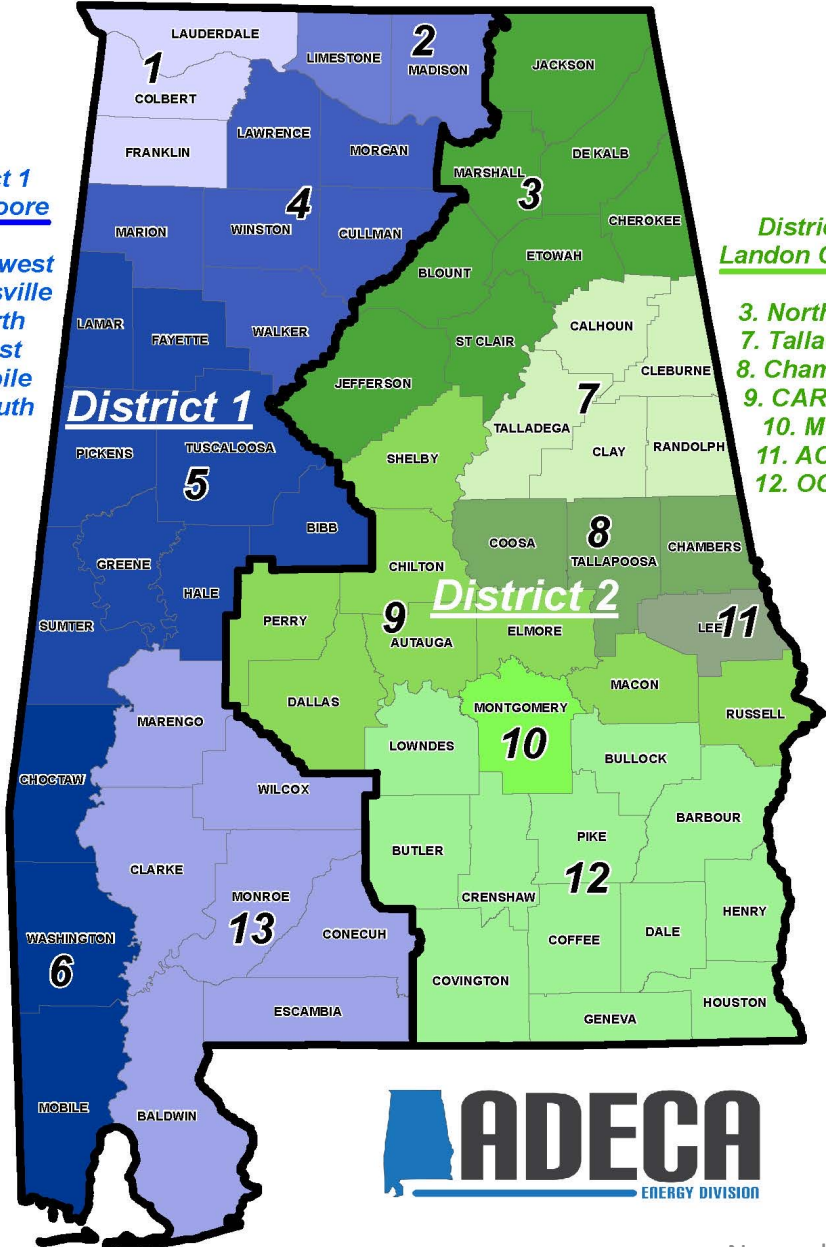
District 4:
Marqueta Stewart

marqueta.stewart@adeca.alabama.gov
(334) 353-4380

wendy.littles@adeca.alabama.gov
(334) 353-3375

CONTACTING ADECA

Weatherization



*District 1
Josh Moore*

- 1. Northwest
- 2. Huntsville
- 4. North
- 5. West
- 6. Mobile
- 13. South

*District 2
Landon Cordes*

- 3. Northeast
- 7. Talladega
- 8. Chambers
- 9. CARPDC
- 10. MCC
- 11. ACHR
- 12. OCAP



Contacting ADECA: Weatherization



District 1:

Josh Moore

joshua.moore@adeca.alabama.gov

(334) 242-2617



District 2:

Landon Cordes

landon.cordes@adeca.alabama.gov

(334) 242-8972

**Weatherization Program Supervisor
Derek Wilson**

derek.wilson@adeca.alabama.gov

(334) 242-5373

PROGRAM UPDATES



CSBG Updates: Rhoda Talley

LIHEAP Updates: Wendy Littles

Weatherization Updates: Derek Wilson

CSBG Updates

- All grants have been extended to March 31, 2024; however, we strongly encourage you to expend all CSBG grant funds by December 31, 2023
- 2021 CSBG Annual Report has been finalized and corrections for the 2022 report have been submitted to The Department of Health and Human Services (HHS)
- 2023 Organization Standards Status
- FY24 CSBG grant award amounts will be based on the 2020 Census poverty percentages per county

CSBG Updates

FY22 CSBG Annual Report Highlights

- 996 Employment Services Provided (excludes referrals)
- 28,124 Education Services Provided
- 2,463 Income and Asset Building Services Provided
- 146,947 Housing Services Provided
- 46,908 Health Services Provided
- 2,854 Transportation Services Provided
- 12,072 Referrals made (includes job referrals)
- 161,613 individuals achieved at least 1 outcome

CSBG Updates

2023 Organizational Standards

- 100% - 8 Agencies
- 90% to 99% - 7 Agencies
- 80% to 89% - 2 Agencies
- Below 50% - 1 Agency

CSBG Updates

2023 Organizational Standards



CSBG Updates

Agencies grant allocations that will **increase** (based on FY23 amounts) due to change in data:

- ACHR – 20.58%
- CAP Middle Alabama – 9.49%
- SEACAP – 10.80%
- CAP Huntsville/Madison & Limestone Counties - 12.22%
- Montgomery CAC – 2.33%
- CAA Northeast Alabama – 4.72%

CSBG Updates

Agencies grant allocations that will **decrease** (based on FY23 amounts) due to change in data:

CAA of South Alabama – 14.71%

CA of Etowah – 2.97%

Mobile CA – 3.78%

CAA Northwest Alabama – 11.25%

Pickens – 13.39%

Walker Co CAA – 13.53%

CAC Chambers-Tallapoosa-Coosa – 19.49%

Macon-Russell CAA – 1.44%

CAP North Alabama – 3.77%

OCAP – 6.53%

CAA TCRCC – 12.95%

CSP West Alabama – 3.54%

LIHEAP Updates

- FY23 Rollover period started October 1st
- Email Wendy Littles if your agency (1) may not expend all FY23 funds by December 31st or (2) would like to request additional funds
- Emergency Supplemental and Disaster Relief funding guidelines
 - Both Crisis and Crisis2 grant periods end on September 30, 2024
- FY24 funding
 - IJJA – started October 1st
 - Emergency Supplemental (Crisis)
 - Disaster Relief (Crisis2)

Weatherization Updates

- Apple Energy Group (AEG)
 - AEG selected respondent for QCI RFP based on extensive experience and access to multiple QCI
 - AEG has already begun reaching out to agencies to schedule monitoring visits
 - Please provide AEG with any documentation requested for the purpose of monitoring units on behalf of ADECA's Weatherization Assistance Program
 - 2022 units are scheduled to be monitored by late January 2024 – early February 2024
 - The Department of Energy (DOE) plans to conduct a technical monitoring in February 2024
- Alabama Community College System (ACCS)
 - ACCS is in the process of creating an Alabama Weatherization website to recruit and communicate with those interested in the weatherization program and receiving training.
 - ACCS along with Alabama Power Company (APCO) are currently working on receiving IREC approval to perform Tier 1 Training. Estimated time to receive approval is the end of June 2024.
 - APCO is now an approved BPI test center with approved BPI Energy Audit exam sites.
 - BPI Online written exams will be offered by the end of the year and BPI Energy Auditor field exams will be offered no later than the end of the first quarter of 2024.

Weatherization Updates

- Carry Over Amendments
 - 2023 DOE grants will be amended with funds that were unspent from PY22 as soon as amounts are finalized
 - Increased funding will not require additional units to be weatherized. Funding should be used on previously planned units if possible.
- PY24 State Plan
 - ADECA will begin working on the PY24 Weatherization Assistance Program State Plan in preparation for the new program year.
- Requests for vehicle purchases under BIL funds is due to Derek Wilson by December 15, 2023. See email from Derek Wilson on October 6, 2023 for more detail.