



# SLFRF Projects

## OKLAHOMA COUNTY

**Compliance Webinar**

November 2023



**Accenture** Strategy & Consulting



# Agenda

**1.**

**Purpose**

**2.**

**Compliance**

2.1. Site Visits and  
Monitoring Requirements

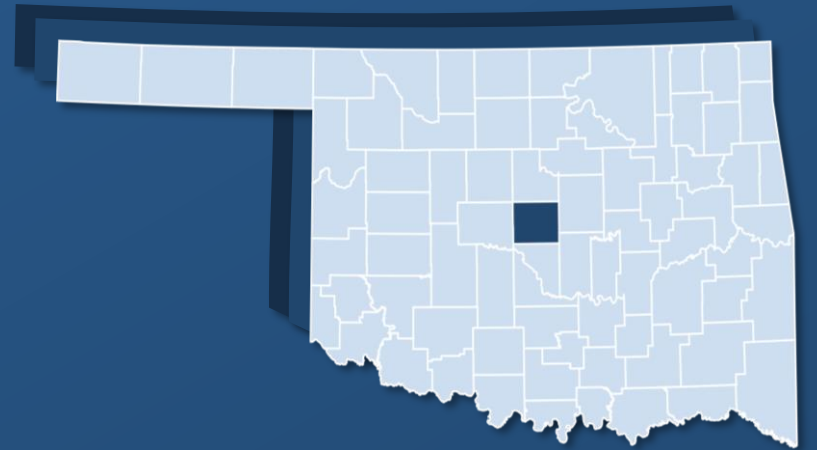
**3.**

**Reporting**

3.1. Quarterly Reporting  
3.2 Detailed Budget  
3.3 Title VI

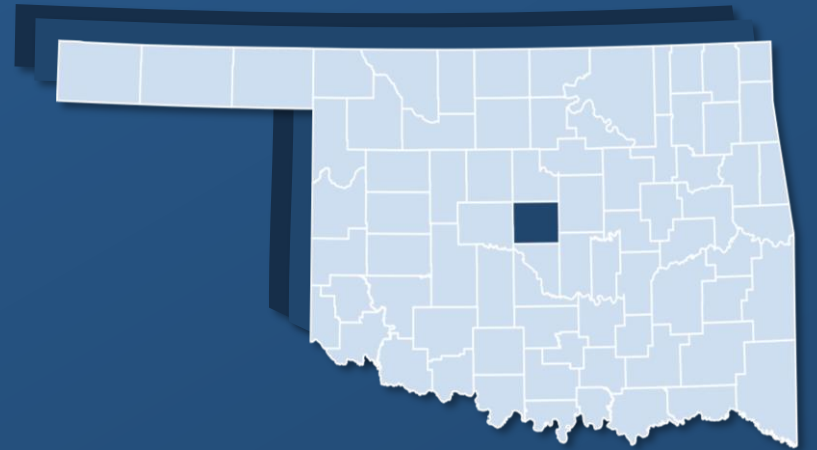
**4.**

**Next Steps**



# 1.

Purpose of this  
Session



# Purpose

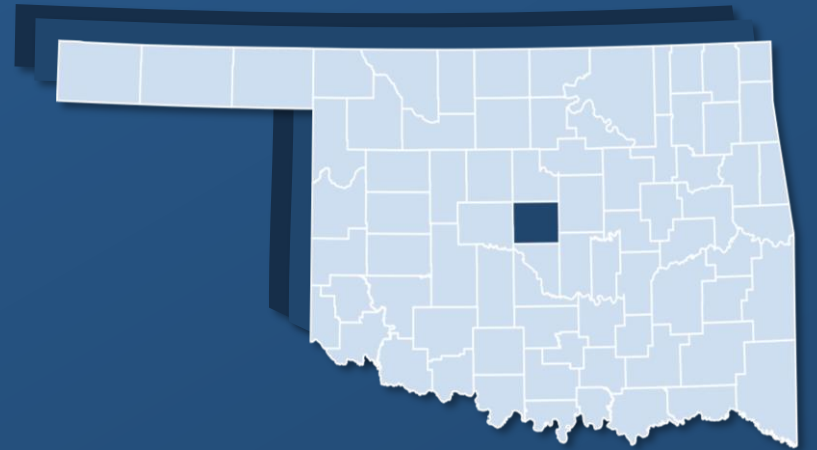
- The purpose of this session is to **provide an overview of the different monitoring and compliance requirements** that each organization will be subjected to.
- By now you would have received your contracts received, and funding where applicable.
- We will discuss various **compliance mandates that will be applicable throughout the funding period**, extending until December 2026.
- We will give you a clear picture of the rules and regulations you need to follow. Our goal is to help you understand what's expected, so you can **stay on the right track**.



At the end of this session, we will share a **link to mark your attendance for the session and provide any feedback**



# 2. Compliance



# 2.1. Site Visits & Monitoring Requirements

**Site visits will be conducted by the PMO team to ensure compliance.**

- Site Visits will take place
  - Once a year for all projects (low risk, medium risk and high risk)
  - Medium risk projects also need to submit an expenditure report once every quarter
- PMO may rely on written assurances from the grantee that it is complying with these standards.
- There are certain details that need to be provided before and during the site visit as outlined below in the process:

Before Site Visit	Site Visit Questions	After Site Visit
<ul style="list-style-type: none"><li>➤ Send a Location and Point of Contact</li><li>➤ Recommended 2 employees: Project Sponsor and financial officer/ procurement officer (or both if they are different individuals)</li><li>➤ Project updates, photos of project/ services</li><li>➤ Demographic information of those served</li><li>➤ Sample of a procurement</li><li>➤ Marketing materials circulated to advertise the services</li></ul>	<ul style="list-style-type: none"><li>➤ Any issues/challenges to the project?</li><li>➤ How many customers have been served?</li><li>➤ Feedback from community?</li><li>➤ Review of the procurement sample.</li></ul>	<ul style="list-style-type: none"><li>➤ The PMO (Accenture) will complete the monitoring checklist and store in compliance file</li></ul>



# When will your monitoring visit take place

- Site-visits will be subject to the expenditure timelines submitted (quarterly reporting excel)
- A mid point visit date will be determined based on individuals project scope and goals
  - One-time costs vs. Ongoing costs
  - Short vs. Long-term implementation
- Advance notice of four weeks will be provided to your organization to prepare for the site visit
  - Flexibility possible
- Site Visits will occur annually until project completion



# 2.1. Site Visits & Monitoring Requirements

During the site visit, the PMO team will cover key compliance requirements.

<b>A.</b> Activities Allowed/ Unallowed	<b>D.</b> Equipment Real Property Management	<b>G.</b> Procurement Suspension & Debarment	<b>J.</b> Reporting
<b>B.</b> Allowable Cost/ Cost Principles	<b>E.</b> Matching level of effort earmarking	<b>H.</b> Program Income	<b>K.</b> Subrecipient Monitoring
<b>C.</b> Cash Management	<b>F.</b> Period off Availability of Funds	<b>I.</b> Real Property Acquisition & Relocation Assistance	<b>L.</b> Title VI





# 2.1. Site Visits & Monitoring Requirements

## Key Compliance Requirements:

**A.**

Activities Allowed/ Unallowed

- Activities completed with grant funds will be reviewed to check if they are in compliance with the grant program, the application and the contract

**B.**

Allowable Cost/ Cost Principles

- The invoices collected will be reviewed to check if all the costs eligible for reimbursement are based on the approved application, contract budget and state or federal regulations

**C.**

Cash Management

- Only applicable if funds were provided by OKC before spending (low risk projects)
- Each recipient will have to show how they are utilizing the funds provided and proper internal controls.



# 2.1. Site Visits & Monitoring Requirements

## Key Compliance Requirements:

**D.**

**Equipment Real Property Management**

- This is applicable if any piece of equipment valued at \$5,000 or more was purchased with grant funds.
- If so, the equipment will be checked to ensure it was purchased according to the appropriate procurement policies and in line with the contract. Equipment will be viewed, or a picture will be requested
- A process to ensure that the equipment will be tracked for ownership and eligible use at least five years must be in place.

**E.**

**Matching level of effort earmarking**

- Identify if there are additional federal funds received and that those funds are not duplicating benefits.

**F.**

**Period of Availability of Funds**

- It will be checked to ensure that the grant activities were completed within the timeframe of the contract and that the funds are expected to be spent prior to December 2026.



# 2.1. Site Visits & Monitoring Requirements

## Key Compliance Requirements:

G.

### Procurement Suspension & Debarment

- A sample of procurements will be requested to check if they follow local or state procurement guidelines and whether the procurement process was documented
- Prior to entering into [subawards and contracts with award funds](#), recipients must verify that such contractors and subrecipients are not suspended, debarred, or otherwise excluded

H.

### Program Income

- This applies if the project earned income for the grantee while the contract was underway.
- Recipients must add [program income](#) earnings to the total award amount and expend it on eligible projects during the award period

I.

### Real Property Acquisition & Relocation Assistance

- This applies if property or land was purchased as apart of this project.
- If so, it will be checked to ensure that property was properly acquired, if an appraisal was conducted, and if fair market value was paid or there is approval from Oklahoma County to pay more (or less) than fair market value.



# 2.1. Site Visits & Monitoring Requirements

## Key Compliance Requirements:

### J. Reporting

- Reports and invoices submitted will be reviewed to check if they were generally submitted on time, with the correct information and with appropriate documentation

### K. Subrecipient Monitoring

- This applies if the grantee contracted with any subrecipients to complete the work.
- It will be checked to see whether the work was completed according to the contract and was monitored or reviewed by the grantee

### L. Title VI

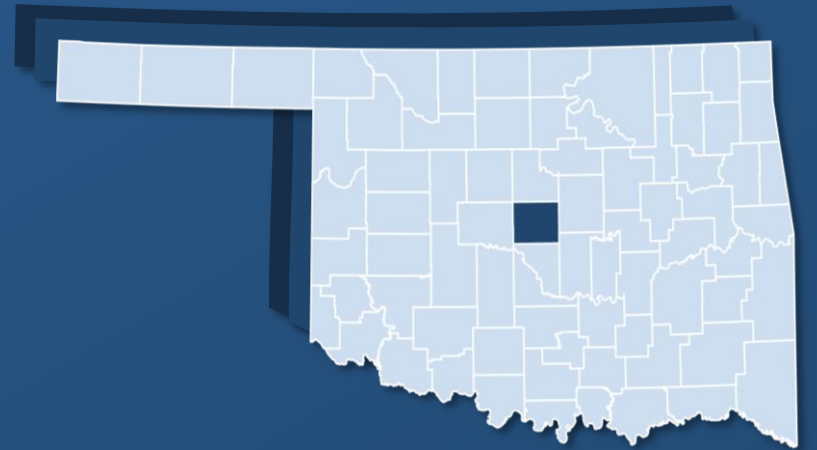
- A form will be provided to subrecipients to ensure compliance with Title VI process.
- Questions cover whether the agency was in compliance with civil rights requirements, whether civil rights compliance reviews have been conducted and whether a copy of the review letter has been saved in the Oklahoma County file



# 3



## Reporting



# 3.1 Quarterly Reporting

You must also submit a report every quarter highlighting key information about funds and management.

When submitting a quarterly report, the following information must be provided:

- **Funding & Expenditure Information:**
  - Authorized Amount
  - Expended Amount
  - Expenditure Updates
  - Amount spent on evidence-based interventions
- **Program Management**
  - Progress As Per Milestones
  - Program Updates
  - Outcomes and Outputs KPI's
  - Use of Evidence
  - Mandatory Performance Reporting

You must also confirm the **budget and project timeline** that you have submitted.

Subrecipient Quarterly Reporting				
			Notes	
Project Identification Information	Treasury Portal ID	Treasury portal ID of the project		
	Organization	Name of the organization		
	Sponsor	Name of the sponsor		
	Project Name	Name of the project which has received funding		
	Project Description	Program proposal and detailed description of the project		
	EC Code	Expenditure Category Code		
	Risk Status	Reporting Risk as determined by the County, on a scale of 1-5		
Funding & Expenditure Information	Authorized Amount	Funding approved and authorized by the County		
	Expended Amount	Funding expended/transferred to the recipient by the County		
	Expenditure Updates	Updates on expenses		
Progress Management	Progress As Per Milestones	If the project is progressing as per milestones and if not, why	<input type="text"/>	
	Program Updates	Updates on key developments and outreach for the program		
	Outcomes and Outputs KPIs	(KPI 1) Tailored KPIs determined by the organization to track the progress of the program		
		(KPI 2 as necessary) Tailored KPIs determined by the organization to track the progress of the program		
		(KPI 3 as necessary) Tailored KPIs determined by the organization to track the progress of the program		
	Use of Evidence	(For select ECs) Updates on dollar amount spent on Evidence Based Interventions		
	Mandatory Performance Reporting	Only applicable for EC's listed below: <b>Household Assistance (EC 2.2), Long-Term Housing Security (EC 2.15-2.16) and Housing Support (EC 2.17-2.18):</b> - Number of households receiving eviction prevention services (including legal representation) - Number of affordable housing units preserved or developed <b>Assistance to Unemployed or Underemployed Workers (EC 2.10) and Community Violence Interactions (EC 1.11):</b> - Number of workers enrolled in sectoral job training programs - Number of workers completing sectoral job training programs - Number of people participating in summer youth employment programs <b>Addressing Educational Disparities (EC 2.24-2.26) and Addressing Impacts of Lost Instructional Time (EC 2.27):</b> - Number of students participating in evidence-based tutoring		



# 3.2 Detailed Budget

Please keep the following in mind for any adjustments to your detailed budget.

- You must **request approval** from the PMO before making any changes to line items on the budget over 10%
- You may not spend more than **10% on administrative costs**

*“If the recipient does not have a NICRA, the recipient may elect to use the de minimis rate of 10 percent of the modified total direct costs pursuant to 2 CFR 200.414(f).” – [Compliance and Reporting Guidance](#)*

Detailed Budget					
<i>Please create additional rows for additional items as required</i>					
Category	Description	Response			
Treasury Portal ID	<i>Treasury portal ID of the project</i>				
Organization	<i>Name of the organization</i>				
UEI Number	<i>UEI number of the project</i>				
Project Name	<i>Name of the project which has received funding</i>				
Personnel Salary & Wages					
\$ No	Description of field	No of units	Price (\$/unit)	Total Price	Notes
1				\$ -	
2				\$ -	
3				\$ -	
4				\$ -	
<b>Final Total</b>				\$ -	
Personnel Fringe Benefits					
\$ No	Description of field	No of units	Price (\$/unit)	Total Price	Notes
1				\$ -	
2				\$ -	
3				\$ -	
4				\$ -	
<b>Final Total</b>				\$ -	
Supplies					
\$ No	Description of field	No of units	Price (\$/unit)	Total Price	Notes
1				\$ -	
2				\$ -	
3				\$ -	
4				\$ -	
<b>Final Total</b>				\$ -	
Advertising and Outreach					
\$ No	Description of field	No of units	Price (\$/unit)	Total Price	Notes
1				\$ -	
2				\$ -	
3				\$ -	
4				\$ -	
<b>Final Total</b>				\$ -	
Rent					
\$ No	Description of field	No of units	Price (\$/unit)	Total Price	Notes
1				\$ -	
2				\$ -	
3				\$ -	
4				\$ -	
<b>Final Total</b>				\$ -	
Maintenance and Repairs					
\$ No	Description of field	No of units	Price (\$/unit)	Total Price	Notes
1				\$ -	
2				\$ -	
3				\$ -	
4				\$ -	
<b>Final Total</b>				\$ -	

Detailed Budget



# 3.3 Title VI

You must also submit a form that showcases your compliance with Title VI.

- Title VI is a provision of the Civil Rights Act of 1964.
- It **prohibits discrimination on the basis of race, color, or national origin** in various programs and activities that receive federal financial assistance.
- This means that recipients of federal financial assistance, such as schools, colleges, transportation agencies, and healthcare providers, are **legally obligated to provide equal access and services to all individuals**, regardless of their race, color, or national origin.
- Title VI is specifically focused on addressing discrimination in **federally funded programs and activities**.
- We will **collect the Title VI form annually** and save it in our compliance files

Title VI			
Field	Description	Responses	Notes
Treasury Portal ID	Treasury portal ID of the project		
Organization	Name of the organization		
Project Name	Name of the project which has received funding		
Compliance with Title VI	Please check the appropriate box to certify compliance with Title VI	We are currently working on achieving Title VI compliance	
Non-Discrimination Commitment	A statement confirming your organization's commitment to not discriminate on the basis of race, color, or national origin in the provision of services, programs, activities, or benefits.		
Policies and Procedures	Briefly describe the policies and procedures your organization has implemented to prevent and address discrimination issues related to Title VI		
Language Access	Explain how your organization provides language access services to individuals with limited English proficiency in accordance with Title VI requirements		
Promoting Title VI Compliance	Describe how your organization actively promotes Title VI compliance within your organization and among your employees		
Record-Keeping	Explain how your organization maintains records and data related to Title VI compliance, including records of complaints and their resolution.		
History of Compliance with Title VI	Has a federal or state agency found the applicant in noncompliance with any civil rights requirement		
	Has a civil rights compliance review been conducted at the grantee's site by any federal or state agency within the last two years If "Yes", has a copy of the finding of the compliance review letter been saved in the Oklahoma County file		
By signing this, you Acknowledgment of the potential consequences for non-compliance with Title VI, which may include the loss of federal funding and other legal consequences.			

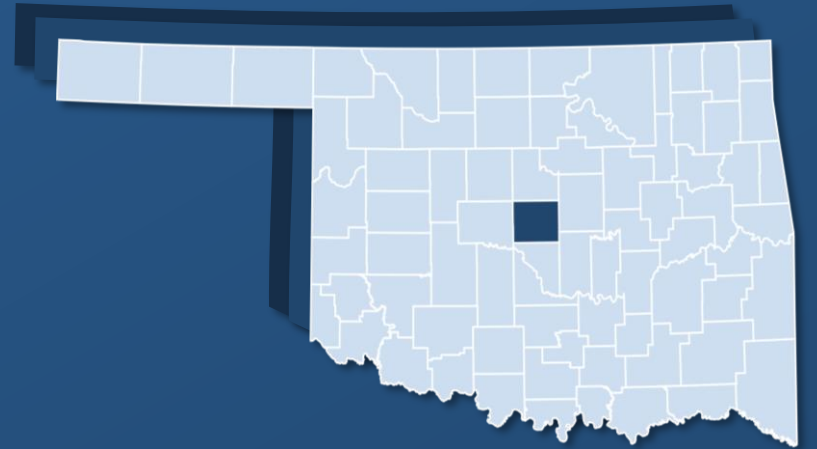
Title VI Form





# 4.

## Next Steps



# Next Steps

- Be **prepared for quarterly report** due on January 1<sup>st</sup> 2024.
- Be **prepared for site visits** due to start in January 2024.
- Ensure you are all **collecting required documents** such as invoices, photos, etc.
- Ensure you are **staying compliant** with all necessary items.
- If you have any **questions, please contact OK ARPA** on [OKCounty\\_ARPA@accenture.com](mailto:OKCounty_ARPA@accenture.com)



# Feedback

- Your feedback will help us plan better for future sessions. We request you to please scan the QR code on the right to fill out your attendance for the session and feedback, if any.
- Alternatively, you can also access the form at : <https://forms.office.com/r/Pnea65NN9S>

## Oklahoma County Compliance Webinar





**Thank You**



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