

CDRLF Grant Round Post-Award Guideline

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Introduction

Congratulations on your 2018 Community Development Revolving Loan Fund (CDRLF) grant award. The NCUA is looking forward to working with your credit union to complete its project successfully. Through the CDRLF program, the NCUA provides financial support in the form of technical assistance grants to low-income designated credit unions serving predominantly low-income members. The CDRLF program consists of Congressional appropriations that are administered by the NCUA.

The term Awardee will be used throughout this document in reference to credit unions. This document is intended to help Awardees navigate through the post-award process for 2018 CDRLF grants. Each section will help you effectively manage, monitor, and report on the activities of your project.

The post-award activities include signing the grant agreement, implementing the approved project, monitoring progress, and completing a reimbursement request. Although this may seem like a lot of work, this document will help ensure your credit union completes each activity smoothly.

While managing your grant, remember the following important items:

- 1. Read and understand your grant agreement before signing.
- 2. Email <u>CUREAPPS@ncua.gov</u> if you're ever in doubt or have questions. The CDRLF Program Team is available to assist you throughout the project.
- 3. Pay attention and adhere to the expense guidelines. This is an area that can create unnecessary delays processing a reimbursement request.

Grant Agreement

The grant agreement formalizes and explains the responsibilities and expectations of both parties in the grant relationship. Awardees must complete and accept the terms of the agreement by January 31, 2019. Failing to complete the agreement within the specified timeframe may result in the grant award being withdrawn from the credit union. The agreement can be accessed by signing into <u>CyberGrants</u>, the NCUA's grant management system.

Agreement Components

- 1. <u>Grant Award Details:</u> This section outlines various details about the approved grant initiative such as the amount approved, commitment number, and performance period.
- 2. <u>Roles and Responsibilities:</u> This section explains the roles and



responsibilities of the Awardee and the NCUA during the grant performance period.

- 3. <u>Signature Page:</u> This section spells out the terms and conditions that Awardees must comply with to officially accept the grant award.
- 4. <u>Appendix A Reimbursement Request Requirements</u>: This section will indicate the items that Awardees are required to submit when requesting a reimbursement.
- 5. <u>Appendix B Extension Requests</u>: This section explains the details of a grant extension and how to request an extension.

An authorized credit union official is required to electronically sign the grant agreement and certify that all of the components were reviewed.

Accessing and Completing the Grant Agreement

- 1. Sign into <u>CyberGrants</u>.
- 2. Go to the "Grant Agreements and Status Updates Requiring Action" section. Select the "Due" button next to the Report Type titled "Grant Agreement".
- 3. Review each component, then indicate whether the credit union plans to comply with the terms and conditions set forth in the agreement.
- 4. Submit the grant agreement to the NCUA through CyberGrants.

Roles and Responsibilities

It is important to understand the responsibilities and expectations of both parties in the grant relationship.

The NCUA, as a Federal awarding agency, is responsible to Congress and the U.S. taxpayer for administering the CDRLF grant program in a manner that enables Awardees to support project objectives and do so in compliance with applicable rules and regulations.

The NCUA ensures integrity and accountability in its grant award administration processes through components such as the grant agreement, reimbursement request documents, and expense guidelines. These components serve as a system of checks and balances, and establish the expectations for Awardees.

Awardees: Implementing and Managing the Grant

• Authorized Credit Union Official (ACUO)

The ACUO is the designated representative of the Awardee who is responsible for the oversight and completion of your project, including the administration of grant funds in a manner consistent with the grant guideline and the terms and conditions of your grant agreement. This representative's signature on the grant agreement certifies that the Awardee will be



accountable both for the appropriate use of funds awarded and for the completion of the post grant award reporting activities resulting from the award. The ACUO is also responsible for ensuring that the Awardee complies with applicable Federal laws and regulations, including underlying agreements, program objectives, and other terms and conditions.

<u>Contractors/Consultants/Vendors</u>

This group of people are representatives that work at the direction of the credit union to implement the grant funded project. Awardees are required to provide a copy of detailed proof of payment and purchase evidence used to accomplish the grant project to the NCUA when submitting reimbursement requests.

*Please make sure the contact information provided for your ACUO is kept current within <u>CyberGrants</u>. If credit union personnel or contact information change, please update the contact information immediately.

NCUA Grant Program Staff: Administering the Grant

- <u>Office Director and Deputy Director</u> The Office Director and Deputy Director are the NCUA authorized approving officials of your grant application, grant agreement, and reimbursement requests.
- <u>Operations Division Director</u> The Operations Division Director is responsible for the supervision of the CDRLF Program Manager and CDRLF Program Team.
- <u>CDRLF Program Manager</u> The CDRLF Program Manager provides guidance to the CDRLF Program Team and reviews any changes related to the grant application, agreement, reimbursement request, and extension requests.
- <u>CDRLF Program Team</u> The CDRLF Program Team reviews and processes all documents related to the grant application, agreement, reimbursement request, and extension requests.

Terms and Conditions

Awardees are required to certify compliance with the following terms and conditions in <u>CyberGrants</u> prior to submitting the grant agreement:

- Awardee is a low-income designated credit union, as defined in Section 701.34 of the NCUA's Rules and Regulations.
- Awardee shall comply with United States Office of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.



- Awardees are required to have an audit conducted if they hold \$750,000 or more in Federal awards during a fiscal year. Awardees that hold less than \$750,000 in Federal awards are exempt from this law.
 - For example, if a credit union uses a \$250,000 loan from the NCUA's Community Development Revolving Loan Fund (CDRLF) and a \$500,000 grant from the Community Development Financial Institutions (CDFI) Fund, totaling \$750,000 in Federal awards during the same fiscal year; then the credit union must have an audit conducted.
- Awardee is responsible for the efficient and effective administration of the Federal Award through application of sound management practices.
- Awardee assumes the responsibility for administering Federal Funds in a manner consistent with underlying agreements, program objectives, and the terms and conditions of the Federal Award.
- No employee, contractor, consultant or vendor has participated substantially for this Grant-funded activity, nor otherwise benefited directly or indirectly from the Grant, who, to its knowledge (assuming reasonable diligence), has a "covered relationship" with an NCUA employee who presently holds a position that would enable him or her to influence a pending or future grant award, or a reimbursement of permitted expenses thereunder.
- An employee, contractor, consultant or vendor of the Awardee would have such a "covered relationship" if he or she were either: (1) a member of the household of an NCUA employee who presently holds a position that would enable him or her to influence a pending or future grant award, or a reimbursement thereunder; or (2) a relative of such an NCUA employee with whom he or she has a close personal relationship. 5 CFR § 2635.502(b)(1)(ii).
- Awardee must disclose in writing to the NCUA any potential conflict of interest in accordance with applicable Federal awarding agency policy.
- Per 2 CFR § 200.113, Awardee must disclose all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the award.
- The Awardee conducts its activities such that no person is excluded from participation in, is denied the benefits of, or is subject to discrimination on the basis of race, color, national origin, sex, age or disability in the distribution of services and/or benefits provided under this grant program. The credit union agrees to provide evidence of its compliance as required by the NCUA. Furthermore, credit unions should ensure compliance with Title VI of the Civil Rights Act of 1964.
- If Awardee enters into commitments for a project before the grant decision is made, Awardee will be obligated to pay project expenses from its own funds should the grant not be approved; if the grant is approved the Awardee may be responsible for a portion of the expenses due prior to the grant approval



date.

- Requests to reallocate or change approved project (s) and/or request an extension to the deadline must be submitted in writing prior to the original deadline and approved by the NCUA prior to Awardee incurring expenses (A request to reallocate or change an approved project only applies to Leadership Development and Underserved Outreach awardees).
- The Awardee is aware that the NCUA will correspond with the credit union regarding this application by email (utilizing the email provided in this application).
- Awardee hereby acknowledges that the NCUA reserves full discretion to deny reimbursement under this Grant in the event the NCUA determines the Awardee is, or previously was, either in breach of any condition or limitation in the grant/reimbursement guidelines, or in breach of the 'covered relationship' restriction set forth above.
- Information included in Outcome Summary or Success Stories is considered by the NCUA to be Research Data and is governed by 2 CFR § 200.315 and may be made publically available.
- By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. Awardee is aware that any false, fictitious, or fraudulent information or the omission of any material fact, may subject Awardee to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730, and 3801-3812).

Signature Page Responses

Awardees are required to input responses to the following items on the Signature Page.

- <u>Confirmation of Grant Usage</u>: Does the Awardee agree to use this grant for the approved project(s) according to the terms and conditions outlined in this grant agreement?
- <u>Certification Statement</u>: Does the ACUO of the Awardee, certify that the Awardee will comply with all the terms and conditions of this grant agreement and that all funds received under this grant will be used strictly for the eligible expenditures as set forth in the expense guidelines?
- <u>Authorized Credit Union Official's Title</u>: Enter the title of the ACUO.
- <u>Authorized Credit Union Official's Electronic Signature</u>: Enter the full name of the ACUO. This represents an electronic signature.



Project Implementation and Reporting

After officially signing the grant agreement, Awardees may begin incurring eligible expenses for the grant project. Awardees are responsible for the timely and complete submission of a reimbursement request. The grant expiration date is December 31, 2019. Awardees that wish to extend the grant expiration date should notify the CDRLF Program Team by email.

Reimbursement Request

The final post-award activity is submitting the reimbursement request. All NCUA grant awards are reimbursable. This means that the Awardee must use its own funds for the approved project, then request a reimbursement when the project is fully completed and the Awardee has received the goods and/or services obtained with the grant funds. The reimbursement request process consists of the following steps:

- Awardee completes and submits the reimbursement request through <u>CyberGrants</u> before the grant expiration date.
- The NCUA thoroughly reviews the reimbursement request.
- The NCUA determines if the Awardee's grant project and reimbursement documentation satisfies the requirements set forth in the guideline and grant agreement.
- The NCUA notifies the Awardee of the final decision by email. If the reimbursement request is approved, the NCUA will deposit the funds into the Awardee's account.

In general, each reimbursement request requires Awardees to provide evidence of the project expenses and an outcome summary about the grant's impact. The NCUA may request additional information to support the reimbursement for an Awardee's project. Narrative outcome summaries that are not detailed and do not reflect the impact of the grant may cause delays in the reimbursement process.

The NCUA will not approve incomplete reimbursement requests. However, if the NCUA has additional inquiries regarding the request then the Awardee will be notified by email to address the matter.

To begin completing the reimbursement request, follow the steps outlined below.

Step One: Accessing the Reimbursement Request

Sign into <u>CyberGrants</u>. Then, scroll to the "Reimbursement Requests Requiring Action" section and select the "*Revise*" button in the "*Action*" column.



<u>Step Two: Contact Information</u> Verify that the contact information listed is accurate and up-to-date.

- To add a new contact, click "Create New".
- To edit an existing contact, click the name of the existing contact and make • your changes.

Click "Save and Proceed" when this section is completed.

Step Three: Organization Information

Verify if the organization information that appears on the screen is accurate and up-todate.

- If it is accurate, click "Save and Proceed".
- If not, update the necessary information then click "Save and Proceed".

Step Four: General Award and Application Details

This section contains information about the original application and details about the grant approval. This section is "read-only", therefore no input is necessary. This section is included for reference purposes. Some of the items included are below.

- Grant Initiative Approved
- Grant Amount Approved
- Application ID
- Grant Commitment Number
- Grant Expiration Date
- Additional Grant Application Contents

Step Five: Reimbursement Request Form

Complete the Reimbursement Request Form in its entirety. Below are the required items to fulfill the Reimbursement Request Form.¹

- Project Impact Narrative: Discuss how this grant helped the credit union • assist underserved members and impact the community. (At least 500 characters required. 2,000 character max).
- Project Outcome: Select the project outcome your credit union achieved through this grant project. Available outcomes are:
 - Added New Products/Services,
 - Developed Employee Skills & Talent,
 - Enhanced Cybersecurity & Data Protection,
 - Increased Loan Growth.

¹ Narrative outcome summaries that are not detailed and do not reflect the impact of the grant may cause delays in the reimbursement process.



- Increased Membership Growth,
- Leveraged Technology to Scale Products/Services, or
- Positioned Credit Union for Future Growth.
- <u>Project Outcome Narrative</u>: Discuss how the grant helped the credit union achieve the selected project outcome. Include specific measureable metrics. For example, the number of new members that joined the credit union during the project period OR the percentage of members that use the new product/service implemented. (At least 500 characters required. 2,000 character max).
- <u>Project Start and End Date</u>: Provide the dates the project started and ended.
- <u>Reimbursement Request Amount</u>: Enter the amount being requested for reimbursement.
- <u>Type of Payment and Purchase Document</u>: Identify the type of document being submitted as evidence for proof of payment and purchase².
- <u>Proof of Purchase Evidence</u>: Upload documentation to support proof of purchase (see below for examples).
 - Detailed Invoice.
 - Work Orders.
 - Receipts.
 - Signed Contracts.
- <u>Proof of Payment Evidence</u>: Upload documentation to support proof of payment (see below for examples).
 - Copies of Cleared Checks (requires the front and back of cleared check OR a cleared electronic copy with clearance information).
 - Detailed Card Statements (payment amount and vendor name must be listed clearly).
 - ACH Confirmation Receipts.
 - Wire Transfer Confirmation (requires details such as transaction ID, amount, transfer status, and date).
- List of Project Vendors: List the name of the vendors used for the project.
- <u>Additional Reimbursement Information (Optional)</u>: Provide any additional information relevant to your reimbursement request such as reports, pictures, and/or individual member success stories.

After completing all of the required elements above, select "*Save and Proceed*" to continue to the "*Terms and Conditions*" section.

² The dollar amounts for the proof of purchase and proof of payment documents must match each other.



Step Six: Terms and Conditions

Read the terms and conditions of the reimbursement request. Then, an authorized credit union official must agree with all of the terms and conditions outlined by completing the following information:

- Name and Position Title of the Authorized Credit Union Official.
- Certify the terms and conditions of the reimbursement request.
- Describe any changes made to the Organization Information section, if any. For example, indicate whether the financial institution name changed or if the credit union name (account holder name) changed.

After completing all of the required elements above, select "*Save and Proceed*" to continue to the "*Reimbursement Request Submission*" section.

Step Seven: Reimbursement Request Submission

Review the information in your reimbursement request. This is your last chance to edit the request prior to submitting it to the NCUA.

- If you are not ready to submit the reimbursement request, then select "*Save Only*".
- If you are ready to submit, click "Submit".

Regulatory and Expense Guidance

This section contains details about the regulatory and expense guidelines for the CDRLF program. The topics in this section include general expense guidelines, initiative specific expenses, ineligible expenses, and additional regulatory guidance for the CDRLF program.

General Expense Guidelines

Awardees must adhere to the following general expense guidelines, unless told otherwise by the NCUA in writing. These guidelines apply to each grant initiative.

- All expenses must be directly related to the specific grant initiative that was approved. Changes to an initiative will not be allowed and any subsequent expenses not related to the approved initiative will be denied.
- In the event that an Awardee is unsure about the eligible expenses associated with the project, Awardees are encouraged to request guidance from the NCUA in writing prior to incurring the expenses. This helps avoid issues at the time of a reimbursement request submission.
- The NCUA will only reimburse eligible projects and expenses up to the total



grant limit for the initiative. Evidence of payment <u>after the grant approval</u> must be submitted with the reimbursement request.

- Expenses eligible for reimbursement must be paid <u>after</u> the grant application is approved and <u>before</u> the grant commitment expires, unless told otherwise by the NCUA in writing.
- Awardees are required to follow the <u>NCUA Letter to Credit Unions 01-CU-</u> <u>20</u> regarding "Due Diligence Over Third Party Service Providers". Third party vendor agreements submitted must include the services or products provided and the associated costs.
- Invoices from outside parties must be billed to and paid by the Awardee credit union.
- Reimbursements will be made to the Awardee credit union only. Payments to credit union officials and personnel are not allowed and will not be accepted.

Initiative Specific Expense Guidelines

The following expenses are eligible uses of the grant as they pertain to the specific grant initiative awarded.

Digital Services and Security Eligible Expenses

- Implementation (project setup, service, and startup costs) and/or enhancement fees.
- Consulting and/or strategic planning fees for eligible projects.
- Marketing expenses must be associated with the grant project and are limited to 25% of the total grant.
 - For example, a \$4,000 grant project is limited to a \$1,000 reimbursement for marketing materials.
- Training costs associated with eligible projects.
- Other costs (must be approved by the NCUA).

Leadership Development Eligible Expenses

- Consulting and/or strategic planning fees for the development of plans and policies (succession planning, development of career track leadership strategy, etc.).
- Enrollment and registration fees for advanced training courses (must be completed within the grant timeframe).
- Tuition reimbursement for courses related to credit union leadership development and/or credit union operations.
- Reasonable travel expenses associated with a leadership development activity such as attending a conference or training course. However, the grant funds may not be used solely for travel expenses.
 - Allowable travel expenses only include the cost of airfare, train, and



lodging. The maximum reimbursable amount for travel expenses is \$1,000. Travel expenses that exceed the \$1,000 limit will not be considered for reimbursement.

• Other costs (must be approved by the NCUA).

Underserved Outreach Eligible Expenses

- Demographic studies.
- Consultant services in developing an outreach strategy and marketing plan targeted to the identified underserved population.
- Expenses associated with developing marketing materials in other languages targeted to the identified underserved population.
 - Marketing materials must be associated with the grant project and are limited to 25% of the total grant. For example, a \$20,000 grant is limited to a \$5,000 reimbursement for marketing materials.
- Credit union staff training as financial counselors.
- Credit union staff training on small business lending.
- Other costs (must be approved by the NCUA).

Ineligible Expenses

Awardees should avoid using grant funds on the following ineligible expenses.

Marketing Expense Limitations

- In order for marketing expenses to be allowable, it must state marketing as an allowable expense under the grant initiative. For those initiatives, marketing expenses must be associated with the grant project and are limited to 25% of the total grant. For example, a \$4,000 grant is limited to a \$1,000 reimbursement in eligible marketing expenses.
- General marketing expenses for the credit union's normal operations are not permitted.
- Marketing expenses are not permitted for the Leadership Development initiative.

<u>The following represent conflicts of interest, and as a result are ineligible uses of grant funds:</u>

- Salaries or payments to employees for services provided.
- Non-staff and non-volunteer expenses at training events and conferences.
- Employees and board members may not receive compensation from hired consultants, partners or vendors.
- Contracts, agreements or internships given to credit union employees and board members or their relatives are prohibited.



The following miscellaneous operational expenses are ineligible uses of grant

<u>funds:</u>

- Custodial services.
- Food and refreshments.
- Matching funds such as the matching portion of an individual development account program.
- Monthly and annual maintenance costs for technical support not associated with the implementation of a new product or service.
- Insurance costs.
- Prepaid expenses such as expenses the credit union has paid prior to receiving grant approval.
- Promotional items such as gifts, giveaways, souvenirs, and gift cards.
- Recurring operational expenses such as rent, utilities, annual financial audits, depreciation, funding for the allowance for loan losses, and office supplies.
- Transportation, lodging accommodations, mileage, and parking for credit union personnel, contractors, and officials (unless directly associated with approved projects such training seminars and conferences).

The following non-operational expenses are ineligible uses of grant funds:

- The NCUA or other government agency employee expenses.
- Projects/contracts based on covered relationships with NCUA employee(s).

Additional Regulatory Guidance

Refer to the Office of Management and Budget's (OMB) <u>Uniform Guidance at 2 CFR §</u> 200 for additional regulatory guidance about federal awards.

Contact Information

If you need to get in touch with someone regarding the CDRLF program, send your request by e-mail to <u>CUREAPPS@ncua.gov</u>. Please allow 48 to 72 hours for a response.

For answers to common credit union questions, you can use our FAQ+ tool. FAQ+ is a knowledge base populated with answers to common credit union questions. If you have a question whose answer isn't in our knowledge base, just submit it, and we'll get back to you, generally within two business days. Your question and answer will then be included in FAQ+ waiting for the next curious person looking for an answer. To use the FAQ+ tool, go to our <u>website</u> and look for the box at the top of the page with "How can we help?"