



NCUA
National Credit Union Administration

2019 CDRLF Grant Round Post-Award Guideline

August 27, 2019



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Introduction

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.

This document is intended to help credit unions navigate through the post-award process for 2019 CDRLF grants. This process includes several components that will help credit unions effectively manage, monitor, and report on the activities of the grant project.

The post-award activities include signing the grant agreement, implementing the approved project, monitoring and reporting progress, and completing a reimbursement request.

Keys to managing a grant:

1. Read and understand the grant agreement before signing.
2. Adhere to the expense guidelines. Failure to do so can result in unnecessary processing delays or denial of reimbursement requests.
3. Email CUREAPPS@ncua.gov with any questions. The NCUA staff is available to assist throughout the project.

Grant Agreement

The grant agreement formalizes the grant relationship and explains the responsibilities and expectations of both parties. Each credit union must complete and accept the terms of the agreement by November 29, 2019. Failing to complete the agreement within the specified timeframe may result in the grant funds being withdrawn from the credit union. The agreement can be accessed by signing into the [NCUA's CyberGrants system](#).

Agreement Components

1. **Grant Award Details**: This section outlines various details about the approved grant initiative such as the amount approved, commitment number, performance period(s), and grant expiration date.
2. **Roles and Responsibilities**: Explains the roles and responsibilities of each



credit union and the NCUA during the award performance period.

3. Signature Page: Spells out the terms and conditions that credit unions must comply with to officially accept the grant award.
4. Appendix A – Reimbursement Request Requirements: Indicates the items credit unions are required to submit when requesting a reimbursement.
5. Appendix B – Extension Request: Explains the details of a grant extension.
6. Appendix C – Project Status Update: Provides NCUA with the required information related to the project progress at a specified time.

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 the [NCUA’s CyberGrants system](#).
2. Go to the “*Grant Agreements and Status Updates Requiring Action*” section. Under *Impact Report(s) Due* select the “**Report**” link to access the 2019 CDRLF 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.

Roles and Responsibilities

It is important to understand the responsibilities and expectations of both parties in the grant relationship. The term Awardee will be used throughout this agreement in reference to credit unions.

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 seeks to ensure integrity and accountability in its grant award administration processes by relying on components such as the grant agreement, status updates, 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 the project, including the administration of grant funds in a manner consistent with the grant guidelines and the terms and conditions of the 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 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.

- Contractors/Consultants/Vendors

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 the ACUO is kept current within the [NCUA's CyberGrants System](#). If credit union personnel or contact information changes, please update the contact information immediately.*

NCUA Grant Program Staff: Administering the Grant

- Office of Credit Union Resources and Expansion (CURE) Director and Deputy Director

The CURE Director and Deputy Director are the NCUA authorized approving officials of the grant application, grant agreement, and reimbursement requests.

- Grant Program Manager

The Grant Program Manager provides guidance to the Grant Program Team and reviews any changes related to the grant application, agreement, reimbursement request, and extension requests.

- Grant Program Team



The Grant Program Team reviews and processes all documents related to the grant application, agreement, reimbursement request, and extension requests.

Terms and Conditions

All credit unions are required to certify compliance with the following terms and conditions in the [NCUA's CyberGrants system](#) in order to submit the grant agreement:

- The 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 term 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 C.F.R. § 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 C.F.R. § 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 a credit union enters into commitments for a project before the grant decision is made, credit union will be obligated to pay project expenses from its own funds should the grant not be approved; if the grant is approved the credit union 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.
- The Awardee is aware that the NCUA will correspond with the credit union regarding this request by email (utilizing the email provided in this request).
- 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 C.F.R. § 200.315 and may be made publically available.
- 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:

- Confirmation of Grant Usage: Does the credit union agree to use this grant for the approved project(s) according to the terms and conditions outlined in this grant agreement?
- Certification Statement: Does the Authorized Credit Union Official 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?
- Authorized Credit Union Official's Title: Enter the title of the Authorized Credit Union Official.
- Authorized Credit Union Official's Electronic Signature: Enter the full name of the Authorized Credit Union Official. This will serve as an electronic signature.

By signing the grant agreement, the Authorized Credit Union Official certifies 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 guidelines.

Project Implementation and Reporting

After officially signing the Grant Agreement, the credit union can begin implementing the approved project. All credit union awardees are responsible for the timely and complete submission of a project status update and reimbursement request.

Reimbursement Request

The final post-award activity is the reimbursement request. All NCUA grants are reimbursements. Credit unions must use their own funds for the approved project according to the terms and conditions of the grant agreement, then request a reimbursement for the eligible expenses incurred. The reimbursement request process consists of the following steps:



- Credit union completes and submits the reimbursement request through the [NCUA's CyberGrants system](#) before the grant expiration date.
- The NCUA thoroughly reviews the reimbursement request.
- The NCUA determines if the credit union's grant project and reimbursement documentation satisfies the requirements set forth in the guideline and grant agreement.
- The NCUA notifies the credit union of the final decision by email. If the reimbursement request is approved, the NCUA will deposit the funds into the credit union's account.

In general, each reimbursement request requires credit unions to provide a narrative outcome summary, proof of payment and purchase documents, and certification the grant funds were used accordingly. The NCUA may request additional information to support the reimbursement for a credit union's project.

Submission of incomplete purchase and payment evidence or an insufficient narrative may cause a delay in the credit union receiving funds from the NCUA.

The NCUA will not approve incomplete reimbursement requests. However, if the NCUA has additional inquiries regarding the request, then the credit union 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 the [NCUA's CyberGrants System](#). Then, scroll to the "Reimbursement Requests Requiring Action" section and select the "**Revise**" button in the "*Action*" column.

Step Two: Contact Information

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 the 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-to-date.

- 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;
- Performance Period Dates;
- Grant Expiration Date; and
- 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.

Data fields marked by an asterisk (*) are applicable only to recipients of Underserved Outreach grants.

The size and scope of Underserved Outreach grants allow for the submission of multiple reimbursement requests. Awardees may submit a reimbursement request, no more than annually, reporting based on the progress made with the funds expended.

- *Performance Period Selection: Multi-year grants will be divided into 12-month Performance Periods. These periods will be identified under the General Award and Application Details section. Underserved Outreach grant recipients will be responsible for identifying the Performance Period during which the expenses detailed in their reimbursement request were incurred.



- *Is this the final reimbursement request?*: By selecting “Yes,” the awardee is indicating that all project activities have been completed and all expenses have been incurred. Select “Yes” only if there are no future reimbursements. If “No” is selected, the Awardee will not be responsible for completing the “Actual Project End Date” field and will be required to complete subsequent reimbursement requests.
- Project Impact Narrative: Discuss how this grant helped the credit union assist underserved members and impact the community. The Project Impact Narrative should include statistics which provide supporting evidence that the project was successful. (At least 500 characters required. 2000 character max).
- Project Outcome: Select the project outcome the credit union achieved through this grant project. Available outcomes are:
 - Added New Products/Services;
 - Developed Employee Skills & Talent;
 - Enhanced Cybersecurity & Data Protection Activities;
 - Increased Loan Growth;
 - Increased Membership Growth;
 - Leveraged Technology to Scale Products/Services; and/or
 - Positioned Credit Union for Future Growth.
- Project Outcome Narrative: Discuss how the grant helped the credit union achieve the selected project outcome. Include specific metrics that were measured. 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. 2000 character max).

The NCUA may return reimbursement requests to Awardees to edit outcome narratives if it is deemed insufficient.

- Program Impact Narrative: Provide a narrative describing how the project made the impacted the underserved population by finding a new/innovative way to serve hard to reach people, such as those in rural or underserved communities.



- Project Start and End Date: Provide the dates the project started and ended.
- Reimbursement Request Amount: Enter the amount being requested for reimbursement.

Recipients of Counselor Certification, Digital Services and Security, and Training initiative grants are not required to submit purchase and payment documentation in the reimbursement request.

Recipients of Underserved Outreach initiative grants must submit the proof of purchase and proof of payment documentation, described below, as a part of the reimbursement request.

Note that all awardees must maintain the records of purchases and payments related to the activities conducted in the completion of the grant project. The NCUA reserves the right to request and collect this documentation to ensure programmatic compliance. These documents are described below.

- *Proof of Purchase Evidence: Upload documentation to support proof of purchase (see below for examples).
 - Detailed Invoice;
 - Work Orders;
 - Receipts;
 - Signed Contracts; and/or
 - Time sheets indicating employee time allocated directly to the project.
- *Proof of Payment Evidence: 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); and/or



- Proof of payment of employee salary.
- *List of Project Vendors: List the name of the vendors used for the project.
- Additional Reimbursement Information (Optional): Provide any additional information relevant to the 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.

Step Six: Terms and Conditions

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

- Name and Position Title of the Authorized Credit Union Official; and
- Certify the terms and conditions of the reimbursement request.

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 the reimbursement request. This is the last chance to edit the request prior to submitting it to the NCUA.

- To save the reimbursement request without submitting to allow for future editing, select “*Save Only.*”
- To submit the reimbursement request, click “*Submit.*”

Project Status Update

The NCUA will notify credit unions that are required to submit a Project Status Update report. The Project Status Update report may be required under the following conditions:

- Failure to submit timely reimbursement requests;
- Failure to complete the project by the Grant Expiration Date; and/or



- Other instances, as determined by the NCUA, in which more information on the project is required.

Below are the components of the status update the credit union must complete in the [NCUA's CyberGrants System](#).

Status of Project to Date: Indicate if the project is one of the following:

- Completed;
- On Target for Completion; or
- Off Schedule and Requires an Extension.

Status Update Summary: Provide a summary of the work completed to date (at least 3-5 sentences).

Challenges Encountered: Describe any issues that have made or will make completing the project on time difficult.

Remaining Work: Provide a summary of the work remaining to complete the project.

Date Expected to Submit Reimbursement Request: Provide the date by which the credit union expects to submit the reimbursement request to the NCUA.

To access the Status Update, sign into the [NCUA's CyberGrants System](#) and scroll to the *"Grant Agreements and Status Updates Requiring Action"* section. Then select the **"Report"** button next to the Report Type titled *"Project Status Update"* or *"Underserved Outreach Project Status Update"* for the Counselor Certification, Digital Services and Security, and Training initiatives or the Underserved Outreach initiative grant, respectively, to access the Project Status Update report.

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

All credit unions 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 a credit union is unsure about the eligible expenses associated with the project, credit unions are encouraged to seek 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.
- Expenses eligible for reimbursement must be paid *after* the grant application is approved and *before* the grant commitment expires, unless told otherwise by the NCUA in writing.
- Applicants are required to follow the [NCUA Letter to Credit Unions 01-CU-20](#) regarding “Due Diligence Over Third Party Service Providers”. Third party vendor agreements submitted must include the services or products provided and the associated costs. Contractor fees that are not substantiated in writing in a partnership/contractor’s agreement will not be reimbursed.
- Invoices from outside parties must be billed to and paid by the credit union.
- Reimbursements will be made to the awardee credit union only. Payments to credit union officials and personnel 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.

Counselor Certification Eligible Expenses

- Enrollment and registration fees for financial and/or homebuyer counseling training courses (must be completed within the performance period of the grant);
- Travel and lodging expenses, if needed, must be in line with federal rates, as listed on GSA’s website;
- Salary, benefits, or incentives used to recruit and hire a certified counselor as a full- or part-time credit union employee.



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 (credit unions will be asked to describe and provide documentation for this expense category).

Training Eligible Expenses

- Consulting and/or strategic planning fees for the development of plans and policies;
- 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;
- Travel and lodging expenses, if needed, must be in line with federal rates, as listed on GSA's website.

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 \$100,000 grant is limited to a \$25,000 reimbursement for marketing materials.



- Other (credit unions will be asked to describe the expense category).

Ineligible Expenses

All credit unions 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; and
- Marketing expenses are not permitted for the Counselor Certification or Training initiatives.

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

- Employees and board members may not receive compensation from hired consultants, partners or vendors; and
- 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 funds:

- 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; and
- Transportation, lodging accommodations, mileage, and parking for credit union personnel, contractors, and officials (unless directly associated with approved projects).

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

- The NCUA operating fee or other government agency expenses; and
- Projects/Contracts based on covered relationships with the NCUA employee(s).

Additional Regulatory Guidance

Credit unions are expected to follow the Office of Management and Budget's (OMB) Uniform Guidance at [2 C.F.R. part 200](#).

Contact Information

Send questions to the CDRLF staff by e-mail to CUREAPPS@ncua.gov. Please allow 48 to 72 hours for a response.

Common credit union questions should be sent to the NCUA's [FAQ+ tool](#). FAQ+ is a knowledge base populated with answers to common credit union questions. If a question whose answer isn't in our knowledge base, just submit it, and the NCUA will respond, generally within two business days. All submitted questions and answers will then be included in FAQ+ waiting for the next curious person looking for an answer. To use the FAQ+ tool, go to our [website](#) and look for the box at the top of the page with "How can we help?"

Helpful Resources

The NCUA's Office of Credit Union Resources and Expansion (CURE) has a variety of other services and resources available for credit unions. We offer a customer service approach to credit unions seeking regulatory and resource assistance in their development and expansion efforts. Services and resources CURE offers includes:



- [Grants and low-interest loans](#) for low-income designated credit unions;
- Help with [Community Development Financial Institution certification](#), including access to the streamlined CDFI certification application;
- A [Learning Management Service](#) that delivers online training for credit unions at no cost. Available training topics include governance, new products and services, and how to improve operations. We will be adding training on field of membership, charter changes, and share insurance;
- A program to preserve and grow [Minority Depository Institutions](#).

For more information, refer to our website:

<https://www.ncua.gov/services/Pages/resources-expansion.aspx>

Below is the contact information for other service areas within our office.

- Chartering: NewFCU@ncua.gov
- Field of Membership Expansion: DCAMail@ncua.gov
- CDFI Certification: CURECDFI@ncua.gov
- Learning: CURELMS@ncua.gov
- For all other inquiries: CUREMail@ncua.gov
- Contact us by Phone: 703.518.6610