

ATTACHMENT 5
SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE
 Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

HHS is requiring further detail from Grantees on their FY2014 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2014 plan which represent improvements or changes to the Grantees' FY2014 plan for preventing and detecting fraud, abuse and improper payment prevention.

Instructions: Please provide full descriptions of the Grantee's plans and strategy for each area, and attach/reference excerpts from relevant policy documents for each question/column. Responses must explicitly explain whether any changes are planned for the new FY.

State, Tribe or Territory (and grant official):		Three Affiliated Tribes – Fort Berthold Reservation, New Town, ND	Date/Fiscal Year: 08-30-13 – FY2014
RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2013 or the prior three years, in annual audits, Grantee monitoring assessments, Inspector General reviews, or other Government Agency reviews of LIHEAP agency finances.	Please describe whether the cited audit findings or relevant operations have been resolved or corrected. If not, please describe the plan and timeline for doing so in FY2014.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
<i>FY-2011 Inspector General is reviewing at this time. Fy-2012& FY-2013 not available at this time, will submit to DHHS within 30 days after completion of audit.</i>	<i>FY-2011 Inspector General is reviewing at this time. FY-2012 audit will be done by June 30, 2013. FY-2013 audit will be done by June 30, 2014.</i>	<i>Plan is in place.</i>	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

According to the Paperwork Reduction Act Of 1995 (Pub. L. 104-13), public reporting burden for this collection of information is estimated to average 1 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

COMPLIANCE MONITORING			
Describe the Grantee's FY 2013 strategies that will continue in FY 2014 for monitoring compliance with State and Federal LIHEAP policies and procedures by the Grantee and local administering agencies.	Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY 2014.	If you don't have a firm compliance monitoring system in place for FY 2014, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<p><i>Three Affiliated Tribes Material Resource Department will maintain the same compliance monitoring in FY-2014 as in FY-2013. As follows: Administration problems will be identified by review of client files, records and reports. The Material Resource Department works closely with the State Department of Health and Human Services and the local tribe and county social service offices to supply each other with continuous updated lists of program participants. Vendors are contacted to assure compliance with vendor agreements between Three Affiliated Tribes and vendors. We have found that cross referencing client information with social services offices gives us the information necessary to avoid duplication of services.</i></p>	<p>Plan will maintain the same compliance monitoring for FY-2014.</p>	<p>Plan is in place.</p>	<p><i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

FRAUD REPORTING MECHANISMS			
For FY 2013 activities continuing in FY 2014, please describe all (a) mechanisms available to the public for reporting cases of suspected LIHEAP fraud, waste or abuse [These may include telephone hotlines, websites, email addresses, etc.]; (b) strategies for advertising these resources.	Please highlight any tools or mechanisms from your plan which will be newly implemented in FY 2014, and the timeline for that implementation.	If you don't have any tools or mechanisms available to the public to prevent fraud or improper payments, please describe your plan for involving all citizens and stakeholders involved with your program in detecting fraud.	Necessary outcomes of these strategies and systems
<p></p>	<p></p>	<p></p>	<p></p>

Three Affiliated Tribes Material Resource do not have any strategies or policies in place at this time on reporting cases of suspected LIHEAP fraud, waste or abuse.

The plan we will implement:
Complain to Program Director and/or Tribal Business Council members on cases of suspected LIHEAP fraud, waste or abuse.

Install a suggestion box on complaints for Tribal Business Council review.

Clear lines of communication for citizens, grantees, clients, and employees to use in pointing out potential cases of fraud or improper payments to State administrators.

VERIFYING APPLICANT IDENTITIES			
Describe all FY 2013 Grantee policies continuing in FY2014 for how identities of applicants and household members are verified.	Please highlight any policy or strategy from your plan which will be newly implemented in FY 2014.	If you don't have a system in place for verifying applicant's identities, please explain why and how the Grantee is ensuring that only authentic and eligible applicants are receiving benefits.	Necessary outcomes from these systems and strategies
<i>Social Security Cards and Tribal enrollment numbers of all family members listed on the application and birth certificates are required if not all of the children have a social security card.</i>	We will maintain in the same plan for FY-2014.	Fort Berthold is located in rural areas where everyone is familiar with everyone.	<i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i>
SOCIAL SECURITY NUMBER REQUESTS			
Describe the Grantee's FY 2014 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.	Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2014, or remaining the same.	If the Grantee is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.	Necessary outcomes from these systems and strategies
<i>Social Security cards and Tribal Enrollment numbers of all family members listed on the application. Birth certificates are required if not all of the children have a social security card.</i>	We will maintain in the same plan for FY-2014.	Plan is in place.	<i>All valid household members are reported for correct benefit determination.</i>

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES			
Describe if and how the Grantee used existing government systems and databases to verify applicant or household member identities in FY 2013 and continuing in FY 2014. (Social Security Administration Enumeration Verification System, prisoner databases, Government death records, etc.)	Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY 2014.	If the Grantee won't be cross checking Social Security Numbers and ID information with existing government databases, please describe how the Grantee will supplement this fraud prevention strategy.	Necessary outcomes from these systems and strategies
<i>Box 1- A Upon application intake Three Affiliated Tribes requires Box 1-B Social Security cards and Tribal Enrollment numbers of all family members listed on the application. Cross checking with the Commodity Food Program and other tribal, county and state offices we are able to identify and verify household social security numbers; income and number of household members. Birth certificates are required if not all of the children have a social security card. Box 1-C Procedures stated above</i>	Plan will remain the same for FY-2014.	Plan is in place.	<i>Use of all available database systems to make sound eligibility determination.</i>
VERIFYING APPLICANT INCOME			
Describe how the Grantee or designee used State Directories of new hires or similar systems to confirm income eligibility in FY 2013 and continuing in FY 2014.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.	If the Grantee won't be using new hire directories to verify applicant and household member incomes how will the Grantee be verifying the that information?	Necessary outcomes from these systems and strategies
<i>Box 1-A Three Affiliated Tribes requires copies of check stubs from applicant employer; copies of monthly income from SS/SSI/VA/TANF or other set monthly income verification. The outreach person checks with employers to verify duration of employment.</i>	Box 1-B We do not have any strategies or policies in place to use "new hire," directories.	Refer to Box 1-A.	<i>Effective income determination achieved through coordination across program lines.</i>

PRIVACY-PROTECTION AND CONFIDENTIALITY			
Describe the financial and operating controls in place in FY 2013 that will continue in FY 2014 to protect client information against improper use or disclosure.	Please highlight any controls or strategies from your plan which will be newly implemented as of FY 2014.	If you don't have relevant physical or operational controls in place to ensure the security and confidentiality of private information disclosed by applicants, please explain why.	Necessary outcomes from these systems and strategies
<i>Box 1-A Confidentiality is essential in managing the LIHEAP program. Many of our clients are concerned about their privacy. We assure them at the time they fill out their application that everything is strictly confidential.</i>	Plan will remain the same for FY-2014.	The LIHEAP office is located in a social service building where customers are monitored and directed to the appropriate office upon arrival.	<i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i>

LIHEAP BENEFITS POLICY			
Describe FY 2013 Grantee policies continuing in FY 2014 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients.	Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY 2014.	If the Grantee doesn't have policy in place to protect against improper payments when making payments or providing benefits on behalf of clients, what supplementary steps is the Grantee taking to ensure program integrity.	Necessary outcomes from these systems and strategies
<i>The Three Affiliated Tribes Material Resource – LIHEAP program uses a Payment Matrix based on the grant allocation, household size and income verified. Households members are required to verify amount of fuel they receive from vendors. When a client is filling out application, very seldom get new clients. Our policy for applicant invoice amounts are deducted from what they were approved for, and put on a requisition along with cuff account, to the Three Affiliated Tribes Property and Supply office, they make out a purchase order and it is routed for signatures: LIHEAP Director, Tribal Finance contract officer, federal programs manager and tribal chairman and</i>	Plan will remain the same for FY-2014.	Also we check again, for double duplicate payments are made on behalf of household. We have not encountered waste, fraud or abuse within the Three Affiliated Tribes LIHEAP program. Fort Berthold is located in rural area where everyone is familiar with everyone.	<i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i>

<i>taken to tribal finance for check.</i>			
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PROCEDURES FOR UNREGULATED ENERGY VENDORS			
Describe the Grantee's FY 2013 procedures continuing in FY 2014 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.	Please highlight any strategies policy in this area which will be newly implemented in FY 2014.	If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please describe how the Grantee is ensuring program integrity.	Necessary outcomes from these systems and strategies
<i>The Three Affiliated Tribes uses a vendor agreement. See attached. Refer to LIHEAP Benefits Policy section.</i>	Plan will remain the same for FY-2014.	Plan is in place.	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>
VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
Describe Grantee FY 2013 policies continuing in FY 2014 for verifying the authenticity of energy vendors being paid under LIHEAP, as part of the Grantee's procedure for averting fraud.	Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY 2014.	If you don't have a system in place for verifying vendor authenticity, please describe how the Grantee can ensure that funds are being distributed through valid intermediaries?	Necessary outcomes from these systems and strategies
<i>The Three Affiliated Tribes uses a vendor agreement. See attached. Refer to LIHEAP Benefits Policy section.</i>	Plan will remain the same for FY-2014.	Plan is in place.	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

TRAINING AND TECHNICAL ASSISTANCE			
<p>In regards to fraud prevention, please describe elements of your FY 2013 plan continuing in FY 2014 for training and providing technical assistance to (a) employees, (b) non-governmental staff involved in the eligibility process, (c) clients, and (d) energy vendors.</p>	<p>Please highlight specific elements of your training regimen and technical assistance resources from your plan which will represent newly implemented in FY 2014.</p>	<p>If you don't have a system in place for anti-fraud training or technical assistance for employees, clients or energy vendors, please describe your strategy for ensuring all employees understand what is expected of them and what tactics they are permitted to employ.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>As mentioned above, we live in a rural area where everyone is familiar with everyone for our staff to detect fraud.</i></p>	<p>At this time we have no anti-fraud training for staff, clients, and energy vendors.</p>	<p>Refer to the LIHEAP Benefits Policy and vendor agreement on what is expected of them.</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>
AUDITS OF LOCAL ADMINISTERING AGENCIES			
<p>Please describe the annual audit requirements in place for local administering agencies in FY 2013 that will continue into FY 2014.</p>	<p>Please describe new policies or strategies to be implemented in FY 2014.</p>	<p>If you don't have specific audit requirements for local administering agencies, please explain how the Grantee will ensure that LIHEAP funds are properly audited under the Single Audit Act requirements.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>See attached- The Three Affiliated Tribes Accounting Manual.</i></p>	<p>We follow the Three Affiliated Tribes Plan for audits.</p>	<p>We follow the Three Affiliated Tribes Plan for audits.</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>

Additional Information

Please attach further information that describes the Grantee's Program Integrity Policies, including supporting documentation from program manuals, including pages/sections from established LIHEAP policies and procedures.

**THREE AFFILIATED TRIBES – MATERIAL RESOURCE DEPARTMENT
LOW INCOME HOME ENERGY ASSISTANCE PROGRAM**

VENDOR AGREEMENT

I. Provision for Vendor Payments:

The Low Income Home Energy Assistance Program of FY_____ states that payments may be made directly to eligible households or to home energy suppliers on behalf of the eligible households. If the supplier has not elected to participate in the LIHEAP, the eligible household will receive a direct payment for the actual amount of energy supplied to the household until the benefit amount is exhausted.

Procedures will be:

- A. To notify participating households of the amount remaining in their account if they are receiving a direct payment, and to notify participating households of the amount of assistance paid on their behalf.
- B. To assure non-discrimination either in the cost of the goods supplied or services provided.
- C. To assure that eligible households will be charged in the normal billing process, the difference between the actual cost of the home energy supplied and the amount of assistance paid on behalf of the household.

If by September 30,_____, any eligible household who have not exhausted their entire regular LIHEAP Benefits will receive a close-out payment in the following manner:

- A. Any remaining benefits in the eligible households account will be paid directly to the Vendor for actual fuel/energy bill at this time, no close-out payment will be made. The Vendor shall provide copies of paid invoices to the LIHEAP Office.
- B. If as of September 30,_____, eligible households who have any remaining credits in their account, these funds will remain in the Tribe's LIHEAP account and may be used as a portion of the Carryover, providing the total amount of carryover does not exceed 10 percent.
- C. This method of payment assures that fuel/energy received by the eligible household will be paid according to the Plan.

VENDOR AGREEMENT

THIS AGREEMENT IS MADE BETWEEN THE THREE

AFFILIATED TRIBES

AND _____

FOR SUPPLYING HOME ENERGY UNDER THE “LOW INCOME
HOME ENERGY ASSISTANCE PROGRAM”

OF _____ AGREES

TO PAY FOR HOME ENERGY SUPPLIED TO ELIGIBLE HOUSEHOLDS

UNDER THE TERMS AND CONDITIONS SET FORTH BELOW:

II. Terms and Conditions:

1. “Eligible households” means all individuals who occupy a housing unit and are determined income eligible by the FY____ median income 60% as amended by the Human Services Reauthorization Act of 1990, Public Law (101-501), and the Human Services Reauthorization Act of 1994; Public Law (103-252), and the Augustus F. Hawkins Human Service Reauthorization Act of 1994 (P.L. 101-501); 45 CFR 96-85.

B. Payments on Behalf of Eligible Households:

3. The Agency will identify to the supplier by an approved letter for each eligible household on whose behalf the agency will make payment; and the maximum payment for each household.
4. This agreement will apply to each eligible household identified to the supplier, unless the supplier notifies the agency within ten (10) days after the household I identified, that the supplier will not accept payments on behalf of that household.
5. The agency will make timely payments to the supplier pursuant to paragraph (8) for the home energy supplied to an eligible household identified under paragraph (4) at the rate changed by the supplier, but no more than rate normally charged to a non-eligible similarly situated household, up to the maximum amount specified for such household.

6. The supplier will deliver home energy no later than 5 days after being notified and the agency will make payment no later than fifteen (15) days after the bill for home energy is presented to the LIHEAP office.
7. The agency will make payment to the supplier in the form of reimbursement and line of credit.
8. Households must sign the invoice upon delivery of fuel, if an invoice is not signed, the agency will not pay. This is to insure accurate amount of fuel delivered.
9. The agency will notify each eligible household upon request the current status of benefits that remain unspent by sending a copy of their ledger.

C. Delivery of Home Energy to Eligible Households:

10. The supplier will provide home energy to households and charge those eligible households in the supplier's normal billing process no more than the different between:
 1. The actual price normally charged to a non-eligible similarly situated household for the home energy delivered.
 2. The payment to the supplier from the agency under the terms of this agreement.
11. The supplier will not discriminate against any eligible household covered by this agreement in the supplier's terms and conditions of sale, credit, delivery or price, including service charges, reconnection charges and payment arrangements. *Addressing Assurance #5 Households receiving assistance will not be treated adversely because of receiving fuel assistance.
12. The supplier will maintain an accounting system and supporting fiscal records adequate to allow the agency to verify the amount of home energy delivered to eligible households covered by this agreement, and the amount of payments made for home energy by all eligible households.

The supplier's records will be made available for inspection and copying by agency representatives upon reasonable notice.

D. Enforcement of this Agreement by Eligible Households:

14. Eligible households on whose behalf payments are made under this Agreement are third party beneficiaries under this Agreement.

E. Decision for Non -Performance:

15. Non withstanding any right under state law to rescind this Agreement for non-performance, the non-performance of a term or condition of this Agreement shall not discharge the obligation of either party with respect to eligible households who have received home energy assistance under this Agreement.

F. Effective Period:

16. This Agreement is effective when signed by the agency and the supplier and shall terminate September 30, _____ or upon thirty (30) days written notice by either party.

17. Not withstanding paragraph (15) termination of this Agreement shall not discharge any obligation owed by either party to the other or to an eligible household if such, obligation was incurred during the effective period of this Agreement.

Material Resource Department-LIHEAP

_____ Date

Supplier Name

_____ Date

Supplier Representative

_____ Date

Supplier Address

GENERAL ACCOUNTING POLICIES

Generally Accepted Accounting Principles

The Mandan, Hidatsa, & Arikara Nation will conform to Generally Accepted Accounting Principles (GAAP)

Fiscal Year

The fiscal year of the Tribe is October 1 – September 30

Reporting Entity

The reporting entity includes all funds of the Mandan, Hidatsa, & Arikara Nation which are received and disbursed by, or are in the custody of the Tribe as well as those programs financed with nontribal funds over which the Mandan, Hidatsa, & Arikara Nation, through their elected and appointed tribal officials, exercise significant fiscal and administrative control.

The reporting entity does not include funds of either individual members of the Mandan, Hidatsa, & Arikara Nation or various nontribal entities which are independent of the Mandan, Hidatsa, & Arikara Nation and over which the Tribe does not exercise significant operating control.

Fund Accounting

The accounts of the Tribe are organized on the basis of funds and account groups, each of which is considered a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets, liabilities, fund equity, revenues, and expenditures (or expenses, as appropriate).

The various funds are grouped by type in the financial statements. The Tribe uses the following fund types.

1. Governmental Funds:

- A. General Fund – The general fund is the general operating fund of the Tribe. All general revenue and other receipts that are not allocated by law or contractual agreement to another fund are accounted for in this fund. General operating expenditures and fixed charges are paid from this fund
- B. Special Revenue Funds – Special revenue funds are used to account for the proceeds of specific revenue sources (other than expendable trust or major capital projects) requiring separate accounting because of legal or regulatory

provisions or administrative action. The Tribe maintains a separate fund for each federal and state grant program.

2. Proprietary Funds. The Proprietary fund measurement focus is upon determination of net income, financial position, and cash flows. These funds are used to account for activities, which are similar to those, found in the private sector.

- A. Enterprise Funds – Enterprise funds are used to account for operations that provide a service to citizens. Enterprise funds are used when an activity is financed primarily by a user charge for provision of that service or when the periodic measurement of net income is deemed appropriate for capital maintenance, public policy, management control, accountability or other purposes. The Tribe operates a loan program for the benefit of its tribal members.

3. Fiduciary Funds.

- A. Trust Funds – Trust funds are used to account for assets held by the Bureau of Indian Affairs (BIA) in a trustee capacity for the Tribe. These include nonexpendable trust funds, which are accounted for in essentially the same manner as proprietary funds, since capital maintenance is critical; and expendable trust funds, which are accounted for in essentially the same manner as governmental funds.

4. Fixed Assets and Long-term Liabilities:

- A. The accounting and reporting treatment applied to the fixed assets and long-term liabilities associated with a fund are determined by its measurement focus. All governmental funds are accounted for on a spending or “current financial resources” measurement focus. This means that only current assets and current liabilities are generally included on their balance sheets. Their reported fund balance (net current assets) is considered a measure of “available spendable resources.” Governmental fund operating statements present increases (revenue and other financing sources) and decreases (expenditures and other financing uses) in net current assets. Accordingly, they are said to present a summary of sources and uses of “available spendable resources” during a period.

Fixed Assets used in governmental fund type operations (general fixed assets) should be accounted for in a General Fixed Assets Account Group, rather than in governmental funds.

Long-term liabilities of proprietary and trust funds are appropriately included in those funds. All other unmatured general long-term liabilities for which the Tribe is obligated in some manner are accounted for in the General Long-Term Debt Account Group.

The General Long-Term Account Group is not a fund. It is concerned only with the measurement of financial position. It is not involved with measurement of results of operations. Because of its spending focus, expenditure recognition for governmental fund types is limited to exclude amounts represented by non-current liabilities. Since it does not affect net current assets, such long-term amounts are not recognized as governmental fund type expenditures or fund liabilities. They are instead reported as liabilities in the General Long-Term Debt Account Group. Principal and interest on long-term debt are recorded as fund liabilities when due.

Basis of Accounting

The accounting and financial reporting treatment applied to a fund is determined by its measurement focus. All governmental funds are accounted for using a current financial resources measurement focus. Operating statements of these funds present increases (i.e. revenue and other financing sources) and decreases (i.e. expenditures and other financing uses) in net current assets.

The modified accrual basis of accounting is required to be used for all governmental fund types. Under the modified accrual basis of accounting, revenue is recognized when susceptible to accrual (i.e. when it becomes both measurable and available). "Measurable" means the amount of the transaction that can be determined and "available" means collectible within the current period or soon enough thereafter to be used to pay liabilities of the current period. A one-year availability period is used for revenue recognition for all governmental fund revenue.

The Tribe reports deferred revenue on its combined statement of assets, liabilities, and fund balance. Deferred revenue arises when potential revenue does not meet both the "measurable" and "available" criteria for recognition in the current period. Deferred revenue also arises when the Tribe receives resources before it has legal claim to them, as when grant monies are received prior to the incurrence of qualifying expenditures. In subsequent periods, when both revenue recognition criteria are met, or when the Tribe has a legal claim to the resources, the liability for deferred revenue is removed from the combined balance sheet and the revenue is recognized.

Allowable Costs

The Tribe and its personnel will strictly adhere to federal regulations and guidelines when expending funds on behalf of a federal, state or local grant or contract. Costs shall be allowable only in accordance with the individual requirements of each grant or contract, federal and state law, and in accordance with OMB Circular A-87 "Costs Principles for State, Local and Indian Tribal Government." SEE APPENDIX A OF THIS MANUAL- Selected Items of Costs-Attachment B of Circular A-87.

The Tribal Business Council shall determine by budget, resolution or other action of the Council, what costs may be incurred in expending tribal funds

GRANTS AND CONTRACTS – PERFORMANCE, MONITORING AND COMPLIANCE

Policy: All grants and contracts will be performed, monitored and complied according to federal regulations and any grant-specific regulations.

Purpose: Maintain compliance with grant and contract regulations and ensure that all costs incurred are allowable in accordance with federal regulations and guidelines.

Scope: All grant and contracts of the Tribe

Procedures:

- 1.0 The Chief Financial Officer and Contract Officer Supervisor will ensure all programs of the Tribe are assigned a Contract Officer.
- 2.0 Contract Officers will maintain a Program file for each program they administer. Program files contain approved budgets, expenditure reports, applicable grant agreements, grant applications, draw down information, and other pertinent information regarding the program.
- 3.0 Contract Officers will ensure compliance, modifications, and amendments to grants/contracts or cooperative agreements with specific regulations of their programs from beginning to end, including the possible requirement of having a separate bank account for the program.
 - 3.1 Contract officers shall assure that all costs incurred by all grants and contracts are allowable costs in accordance with OMB Circular A-87 and other specific requirements of the contract or grants. SEE APPENDIX A OF THIS MANUAL-Selected Items of Cost for State, Local and Indian Tribal Governments-Attachment B of Circular A-87.
- 4.0 All finance, contracting, property and supply staff and program directors will review and be familiar with the applicable Federal regulations and guidelines to include but not limited to:
 - OMB Circular A-87 “Cost Principles for State, Local and Indian Tribal Governments”
 - OMB Circular A-102 “Administrative Standards for Grants of State, Local, and Indian Tribal Governments”
 - OMB Circular A-133 “Audits of States, Local Governments, and Nonprofit Organizations”

- 4.1 All finance, contracting, property and supply staff and program directors shall participate in and complete an organization approved annual training program covering the items outlined in 4.0.
- 5.0 The Chief Financial Officer will ensure all applicable Accounting staff review and understand applicable regulations. The Contract Officers will ensure all applicable Program Directors review and understand applicable regulations.
- 6.0 Contract Officers are responsible to submit all types of federal financial forms in accordance with contract/grant-regulated terms.
- 7.0 Contract Officers will ensure Program Directors submit narrative/progress reports according to the respective contract or grant guidelines.
- 8.0 Contract Officers will submit paperwork concerning purchasing and other closing documents within the specified guidelines ending the grant or contract. Contract Officers will ensure that the Program Directors submit the appropriate paperwork at the end of the grant. All closeout paperwork will be submitted by Program Directors within 90 days of the end of the grant.
- 9.0 Re-contracting procedures for Federal Regulations need to be completed 90 days prior to the beginning of the next Fiscal year.
- 10.0 The Contract Officers will follow the policies and procedures attached in the letter dated October 13, 2003.
- 11.0 All federal and state contracts will be subject to the allowable cost standards as listed in OMB Circular A-87 Attachments A and B as included in this manual as Appendix A and other cost standards as specified in the applicable federal or state grant or contract agreement.
- 12.0 All federal and state contracts will be subject to the compliance requirements of OMB Circular A-133 as included in this manual as Appendix B and other compliance requirements as specified in the applicable federal or state grant or contract agreement.

Grant File Management

Policy: All grants and contracts will be performed, monitored and complied according to federal regulations and any grant-specific regulations

Purpose: Maintain consistent file management for all grants and contracts and to ensure compliance with all rules and regulations.

Scope: All grant and contracts of the Tribe.

Procedures:

- 1.0 The files should contain a Financial Status Recap, which includes:
 - 1.1 Identification of the program:
 - 1.1.1 Federal agency providing the funding
 - 1.1.2 CFDA # of the program
 - 1.1.3 Identification of any flow through agencies or identification of the program as a direct program
 - 1.1.4 Identification of the period of availability
 - 1.2 Recap of the financial transactions
 - 1.2.1 Dates and amounts of draw down requests
 - 1.2.2 Status of expenditures incurred
 - 1.2.3 Reconciliation of recap to the general ledger
- 2.0 A copy of the original grant and any amendments should be maintained in the file.
- 3.0 A copy of the program compliance supplement should be maintained, and should include documentation of the discussions with the program administrator as to the nature of the requirements and the assignment of the responsible party.
- 4.0 Copies of the documentation supporting the procurement process or documentation of the discussions with the program administrator as to his/her responsibility should be maintained in the file.
- 5.0 Copies of all financial reports should be filed, along with any supporting documentation for the reports attached. Program reports should be copied and filed. Finally, report submission requirements should be developed and maintained in the file.
- 6.0 Any correspondence with the awarding agency, sub-recipients, inter office memorandums, vendors, or other parties should be documented and captured in the file.

Grant and Contract Receivable (cost reimbursable grants)

Policy: Grants and contracts necessitating proof of expenditure before reimbursement will be maintained by each Contract Officer under the review of the Chief Financial Officer. These grants and contracts do not include programs where drawdown can be made simultaneously with the expenditures

Purpose: Ensure timely and accurate information regarding expenditures under cost reimbursable grants are submitted to the appropriate agency and collected.

Scope: All cost reimbursable grants of the Tribe

Procedures:

- 1.0 The Contracts Officer Supervisor will identify all grants and contracts and the respective Contract Officer that operate under a cost reimbursement basis. The Contract Officer will determine the threshold amount or other point at which to initiate a draw down request based on expenditures from accounting records. For example, one program may be determined to do only a monthly reimbursement while another program may need to do a reimbursement once a certain dollar amount has been expended.
- 2.0 The Contract Officer is responsible for initiating and documenting drawdown as required by guidelines set by the contract or grant.
- 3.0 Refer the to "Receipts-Draw down of Grant/Contract Funds" section of the manual for the remaining procedures for this section.
- 4.0 The Chief Financial Officer and the Contracts Officer Supervisor will ensure that all Contract Officers are maintaining their respective cost reimbursable grants and processing draw down requests at appropriate intervals.

Receipts – Drawdown of Grant/Contract Funds

Policy: Drawdown of grant/contract funds will be done when possible to receive cash funds and internal controls are present to effectively account for the drawdown.

Purpose: Increase the speed in which cash funds are available and to accurately record draw down information

Scope: Applies to all grant/contract funds for which drawdown are done.

Procedures:

- 1.0 Once a grant or contract has been awarded and it is determined that some or all of the money will be awarded upfront, the Receipting Manager will follow the procedures set forth in the “Receipt of Funds” section of the policies and procedures manual.
- 2.0 The Chief Financial Officer will setup a bank account in which the funds will be deposited.
- 3.0 The Contract Officers will provide a breakdown of revenue codes for the grant or contract. and the Finance Manager or Accounting Technician will post an entry for the grant/contract to properly establish an account in the general ledger system
- 4.0 The Contract Officer will monitor invoices/vendor statements for each applicable grant or contract and identify when funds need to be drawn down. The Contract Officer will ensure that each invoice/vendor statement has a purchase order attached to it.
- 5.0 The Contract Officer will request a draw down of funds (on a timely basis) though the applicable systems on the computer or by applicable paperwork.
- 6.0 The Contract Officer will complete a transfer of funds document that is approved by the Finance Manager, to ensure that adequate funds are transferred from the grant/contract bank account to the bank account that will disperse the funds to pay the invoice/vendor statement.
- 7.0 The Finance Manager will review the documentation to ensure proper coding of the funds and bank account deposited in.
- 8.0 The Accounting Technician will enter the information from the transfer of funds document into the computer system and print a deposit journal report. The Chief Financial Officer will verify the accuracy of the deposit journal entry and the accounting technician will post the transaction.

- 9.0 Once posted, the Accounting Technician will gather the transfer of funds and journal entry documentation and return to the Contract Officer for file management for each grant or contract
- 10.0 The Contract Officer will complete all required 272 quarterly reports and have them approved by the Chief Financial Officer