



DIVERSE BUSINESS ASSISTANCE GRANT PROGRAM GUIDE

Version: March 13, 2023

1.0 GENERAL INFORMATION

1.1 Introduction

The purpose of this grant program is to assist chambers and non-profit organizations providing assistance to small businesses owned by individuals that have experienced barriers to capital and have been disproportionately impacted by the COVID-19 pandemic.

1.2 Granting Agency

This grant program is administered by the Department of Administration (DOA), which is the sole point of contact for the State of Wisconsin. All communications to DOA should be directed to the following email address: DiverseBusinessAssistance@wisconsin.gov.

1.3 Grant Agreement Term

The grant agreement shall be effective on the execution date and shall be in force until all eligible activities are completed and all required documents are submitted to DOA. Expenses must be incurred between March 3, 2021, and December 31, 2024.

1.4 Semi-Annual Reports Required

Grantees shall submit semi-annual reports (every six months) to DOA summarizing the use of funds and describing the impact on the grantee and the individuals it serves, unless more frequent or enhanced reporting is required pursuant to the Grant Agreement. DOA will supply a report document for completion by grantees and prescribe the dates upon which the reports are due. DOA reserves the ability to update/revise the reporting form over time to collect information necessary to meet its own obligations to report to the US Dept of Treasury, monitor grantees, and keep the public informed.

1.5 Recordkeeping

Grantees must maintain for at least five years following the end of the grant's performance period records sufficient to demonstrate that the expenses were compliant with obligations under state and federal law, and the grant agreement.

1.6 Public Disclosure

Copies of the application materials, excluding materials deemed to be confidential and proprietary information on Appendix B: Designation of Confidential and Proprietary Information (DOA-3027), the grant agreement and any other related material will be made available for public inspection in accordance with applicable Wisconsin law.

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1.7 Compliance with Applicable Law

As outlined in the grant agreement, Grantee is solely responsible for demonstrating that payments it receives under the Program meet the eligibility requirements set forth under the agreement, state and federal law, and state and federal guidance. Grantee agrees as part of its grant agreement to hold DOA and the State harmless for any audit disallowance related to the eligibility of costs or revenues, irrespective of whether the audit is ordered by federal or state agencies or by the courts and will be solely responsible for repaying the ineligible amounts (plus any assessed interest, costs, or fees) to the State or the federal government.

1.8 Subawards

Under the terms of the grant agreement, subawards, transfers of funds to third parties, are permissible for the purposes of grantmaking or forgivable loans. Subawards do not include costs associated with ordinary purchases of goods or services (e.g., hiring a third party to provide professional services). Grantee must maintain oversight and monitoring of subawards.

2.0 FREQUENTLY ASKED QUESTIONS

Below are answers to many of the questions that grantees have submitted to the Diverse Business Assistance Program (DBA). These answers have been revised due to recent guidance from the U.S. Department of the Treasury that significantly reduced the federal regulations applicable to the Program. If you do not believe your question has been answered in this document, or if you have additional questions, please submit your follow-up to: DiverseBusinessAssistance@wisconsin.gov.

Grant Agreements

2.1 Are you taking comments/questions about the grant agreement?

The Program is accepting comments and questions via the Program email: DiverseBusinessAssistance@wisconsin.gov.

2.2 Is there a deadline for getting the grant agreement signed?

No, there is not a deadline currently in place for signing the agreement; however, funds are not available until an agreement has been signed and a funding request has been submitted and approved.

Communications and Training

2.3 How do we make changes to the DocuSign agreement (e.g., change the authorized signatory, change, or confirm the designated contact person, etc.) or add additional contacts for our organization? What is the best way to confirm the correct email address for receiving the DocuSign? The person in our organization will be leaving in the upcoming weeks.

Please send an email to the program email box (DiverseBusinessAssistance@wisconsin.gov) with the information that you would like to change, add, or confirm. You are able to provide the contact information for more than one person attached to the program and re-assign signatories. For example, in the context of an authorized signatory, send an email stating the grant project ID, the former authorized signatory name and contact details, and the new signatory's information. To confirm the correct email

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address for receiving the DocuSign, you can review the information provided in the contact information survey. If this information needs to be changed, please email the program email.

2.4 Is there a specific contact person for each grantee?

All communications will be handled through the program mailbox. There is not a specific contact person for each grantee. The Program email is DiverseBusinessAssistance@wisconsin.gov. Program staff monitor the mailboxes and will respond as quickly as possible. If you need immediate assistance or would like to speak to program staff over phone, please indicate this in your email.

2.5 Can staff time for attending required DOA trainings be covered by grant funds?

Yes, staff time used to attend required training events can be paid for using grant funds.

Disbursement of Grant Award Funds

2.6 When will we receive our grant award funds?

Grant awards will be provided to grantees in semi-annual disbursements. The first disbursement will be made following full execution of the grant agreement by both parties, and within approximately 30 days of the grantee's submission of Attachment C to the agreement, which is the Semi-Annual Report and Payment Request Form. Subsequent disbursements generally will be made in January and July of each year as advances for grantee expenditures during the upcoming six-month period.

The Semi-Annual Report and Payment Request Forms are due on December 1st and June 1st, to receive payment in January and July. Program staff will process payment requests as received, on a rolling basis.

In general, if the grantee submits a properly completed Attachment C – Semi-Annual Report and Payment Request Form, payment will usually be made within 30 days of receipt. For payment requests that are incomplete or require additional information, the period may be longer. Once a payment is approved by DOA, you will receive a confirmation email from DocuSign and a payment will be initiated. Any questions about payment requests should be directed to the program mailbox.

2.7 Will the awards be made in a lump sum to Grantees?

Generally, no. See Question 2.6 above.

However, if you expect to spend your entire grant award by December 31, 2022, you may request the entire amount in the first payment request. In all other cases, the State will release funds in installments throughout the performance period, based on the costs you expect to incur during each reporting period.

2.8 How and when do we submit request for payment of expenses between the time the grant agreement is executed and December 31, 2022? What time period will the first grant disbursement cover?

Initial payment requests may be submitted at or after the time of execution of your grant agreement. The initial payment request will cover expenses through December 31, 2022. The payment form will be

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available on the program website: <https://doa.wi.gov/pages/DiverseBusinessAssistance.aspx>. Grantees should make their best estimate of funds needed to cover each six months of the performance period.

The initial disbursement covers both past expenses (if they were included in grantee's original budget) and future expenses eligible under the terms and conditions of the grant agreement. It may cover eligible expenses included in Grant Agreement Attachment B- Budget, incurred, or to be incurred, on or after March 3, 2021 (the earliest date permitted by the American Recovery Plan Act) through December 31, 2022.

2.9 How far in advance should we ask for funds, and how long until disbursement of funds should reasonably be expected?

Grantees must submit payment requests at least 30 days before the start of each semi-annual payment period. Payment requests must be made using the Semi-Annual Report and Payment Request Form included as Attachment C to your grant agreement. Disbursements generally will be made at the start of the payment period. See Attachment C to your grant agreement for more information.

2.10 Must a purchase order be in place before we can request advance payment for an upcoming expense?

No. Grantees may request funds in advance for any eligible expenses that may be incurred during the upcoming reporting period, regardless of whether a formal purchase order has been issued yet. See Article 5 of the grant agreement for the definition of eligible expenses.

2.11 If we miss the July 1 disbursement date, do we have to wait for December 1 to request for January 1?

No. Grantees' first request for payment is considered the Initial Payment Request Period and may be submitted within 30 days after grant agreement execution.

2.12 After we receive our first payment, what time periods will be covered by the future semi-annual requests for payment?

The next reimbursement request may be submitted in December 2022 for disbursement in January 2023. The request will cover expenses grantee expects to be incurred between January 2023 and July 2023. Similarly, the third reimbursement request may be submitted in June 2023 for disbursement in July 2023 and will cover expenses expected to be incurred between July 2023 and December 2023. Requests for reimbursement of calendar year 2024 expenses will follow the same timing. Payment requests should include amounts you expect to incur for each six-month period through the performance period.

2.13 Do funds have to be spent in equal portions each year of the grant?

No.

2.14 Our first-year request for payment was based on our best estimate of expenses. At the end of our year, IF the actual expenses differ, where and when do we adjust or compensate for that difference? How do we accurately report "past reporting period" activities?

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Grantees can estimate expenditures through the end of the performance period, but they are required to provide their actual expenditures on the subsequent Payment Request Forms in Column 3 of the Budget Worksheet. If you would prefer to not use estimates, you can fill-in the Budget Worksheet, listing only costs incurred, rather than using estimates. Furthermore, if you have incurred any carryover funds from your previous request, this can be explained in the narrative section.

By submitting the Payment Request Form, you are attesting to the accuracy of the totals listed in your payment request and that expenses are eligible pursuant to your grant agreement. See Article 5 of the grant agreement for the definition of eligible expenses. You do not need to provide receipts or documentation as part of submitting a Payment Request Form. You may be asked to provide those materials as part of the monitoring process.

2.15 Can we be reimbursed for costs already incurred?

Yes. Eligible expenses incurred on or after March 3, 2021 and included in the Grant Agreement Attachment B – Budget may be submitted for payment. See Article 5 of the grant agreement for the definition of eligible expenses.

2.16 We are getting payment by physical check. How can we change this to ACH?

Funds will be distributed via check or ACH at the State’s discretion based on how your organization is set up in the State’s financial system. Contact the program mailbox and staff will assist you with setting up an ACH. Please note that you will need to provide some basic banking information to complete the ACH process.

2.17 Do I need to send a quarterly report before sending the next payment requests?

No, they are submitted at the same time. Both are submitted on the same form called the Semi-Annual Report and Payment Request Form. Grantees are required to submit a Semi-Annual Report and Payment Request Form every six (6) months.

2.18 On the Semi-Annual Report, is the contact person the signer or can it be a project manager?

The contact person should be the contact for any questions regarding the Semi-Annual Report and Payment Request.

Period of Performance

2.19 Some of the regulations indicate expenses must be obligated by December 31, 2024 but expended by December 31, 2026. Can you please talk about this and what is required for obligation, especially in regard for personnel expenses.

The current intent is for the Performance Period to end on December 31, 2024, for this program, meaning that expenses must be expended by December 31, 2024. The Program will evaluate the need for any potential extensions as it monitors grantees’ progress.

2.20 Will the deadline for spending grant award funds be extended?

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The current intent is for the Performance Period to end on December 31, 2024, and grantees should plan accordingly. The Program will evaluate the need for any potential extensions as it monitors grantees' progress.

2.21 Can we charge project expenses incurred before the grant agreement is executed? If we track spending NOW on this project, do we have the DOA's approval to bill these expenses retroactively?

Yes. Eligible expenses for your project incurred on or after March 3, 2021, and included in the Grant Agreement Attachment B – Budget, may be submitted for payment. Grantees' first request for payment is considered the "Initial Payment Request Period" and may be submitted within 30 days after grant agreement execution.

2.22 Is there any requirement that money be spent or costs be incurred during 2022?

No. Spending during 2022 is not required. However, project activities are expected to begin soon if they have not already started. The Period of Performance ends on December 31, 2024. All expenses must be incurred, and projects completed by that date. Grantees will be required to report on their progress as a condition of receiving each semi-annual disbursement of grant award funds.

2.23 At what point can we begin hiring and have any hires reimbursed from grant process?

Grantees may begin the hiring process now as eligible expenses for your project that were incurred on or after March 3, 2021, and included in the Grant Agreement Attachment B – Budget, may be submitted for payment.

2.24 We wrote this grant in 2022 with the expectation that we would begin the program in early 2023. With the time delay now, will we simply adjust the timeline accordingly?

Yes, however, keep in mind that the current intent is for the Performance Period to end on December 31, 2024, and grantees should plan accordingly. The Program will evaluate the need for any potential extensions as it monitors grantees' progress.

2.25 In August, we submitted a request for all funds remaining on this grant. Our balance is now zero. How do we close out our grant?

Program staff will follow up with you with a closeout form if all your funds have been disbursed and your project is complete. Until program staff have followed up with you with closeout procedures, please continue to submit a Semi-Annual Report. Additionally, you may still be responsible for additional conditions, i.e., mandatory attendance at trainings, until your project has been closed out.

Excess Funds

2.26 Because a portion of the grant award will be made as an advance to grantees, what will happen to any excess funds remaining at the end of any six-month period?

In general, any funds remaining at the end of a period may be used toward eligible costs for the upcoming reporting period. Payment requests submitted for upcoming periods may be reduced, or advances may

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be postponed, to account for unspent funds. The Program may require that any funds remaining at the end of the Performance Period (December 31, 2024) be returned to the State.

2.27 What happens if the project doesn't use all the funds before December 31, 2024? Do they lose the remaining balance or do all the funds go back?

The Program's goal is to help grantees successfully complete their projects. Only in exceptional circumstances would a grantee be required to return all grant funds. Because funds will be distributed to grantees on a semi-annual basis and grantees are required to submit progress reports, this is unlikely to occur. Grantees must notify the Program at least 90 days in advance of the end of the Period of Performance (December 31, 2024) if they expect any funds not to be expended by that date, so the Program can determine whether a return of remaining funds is necessary.

Procurement

2.28 Are grantees required to follow any particular procurement requirements when purchasing goods or services with grant funds? What if I'm only paying salaries and rent with the funding?

The revised Treasury Department guidance removed a number of applicable federal regulations regarding procurement. The Program will now permit grantees to follow their own written procurement policies (rather than federal procurement rules) when purchasing goods and services with their grant funds, as long as Grantee follows the standards set forth by the amended grant agreement. The grant amendment specifies that the Grantee must have, maintain and follow written procurement procedures which ensure:

- Grantee pays reasonable prices when procuring goods and services;
- Reasonable forms of competitive procedures are used where practical and appropriate in light of the value of the goods or services being procured;
- Grantee obtains goods and services in an open, consistent, and ethical manner; and
- Grantee avoids conflicts of interests in its procurement decisions.

A best practice in developing a policy would be to use the federal grants procurement policy found at 2 CFR 200.317-327; however, this is not required. If you have questions about whether your procurement and conflict of interest policies meet these new requirements, please contact the Program at:

DiverseBusinessAssistance@wisconsin.gov.

2.29 I did not want to negotiate a new supplier (subcontractor) relationship until our group had signed our contract with DOA. I understand from the most recent communications I received that we should go ahead and firm up our subcontractor relationships ahead of the time that we sign contracts with DOA. Am I understanding the situation correctly?

Grantees may begin that process now as eligible expenses for your project that were incurred on or after March 3, 2021, and included in the Grant Agreement Attachment B – Budget. Grantees are required to ensure they follow proper procurement procedures before entering into contracts for goods or services. See 2.28 above.

2.30 Does the grant allow for the purchase of subscriptions like Zoom accounts and Internet hotspot access, or subscriptions to digital learning software?

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Yes, if the purchases were included in the budget submitted with your grant application or otherwise approved as part of your Grant Agreement, Attachment B, Budget.

Budgets

2.31 Are we to provide detailed costs on Attachment B through DocuSign, as opposed to providing a separate spreadsheet?

Yes. During the grant agreement execution process in DocuSign grantees are instructed to complete Attachment B, Budget by entering grant funding and cost-share (if applicable) amounts in the appropriate cost category. The Program will not accept spreadsheets in lieu of completing Attachment B – Budget. As part of its monitoring activities, the Program will request more detailed cost accounting from Grantees separately.

2.32 You mentioned the possibility of resubmitting budgets. What is the process and what limitations do you have on this? If the total award amount does not change, is it possible to move funding from one category to another in the application categories? How much flexibility do we have with the budget from the original budget? If the project is the same but we have more knowledge now, can we adjust some of the category costs? Will we be allowed to amend our anticipated budget over the grant period?

During the grant agreement execution process, Grantees were asked to complete Attachment B – Budget. Grantees may not submit budgets that substantially deviate from the project activities, budget and timeline proposed in the grant application. However, the Program recognizes that certain costs may have changed since the filing of your grant application. It is possible to submit a budget with the line items adjusted to account for increased costs; however, Grantees may not submit an Attachment B – Budget with a total award amount greater than the amount identified on the Notice of Intent to Award.

Additionally, Grantees may not submit budgets that substantially deviate from the project activities, budget and timeline proposed in the grant application. Once the agreement is executed, any future adjustments to the budget must be approved by the Program. Generally, adjustments between existing line items on Attachment B - Budget that impact 10% or less of the total budget will be approved. Adjustments impacting more than 10% of the total budget will be evaluated on a case-by-case basis. Please send the program mailbox an email detailing your budget adjustment request and program staff will follow up.

2.33 Given that the budget on the grant agreement is much more detailed and may be in different categories than what was in the application. What counts as a “budget adjustment” vs “proper categorization” of expenses?

It depends. Grantees may not submit budgets that substantially deviate from the project activities, budget and timeline proposed in the grant application. However, the Program recognizes that the Grant Agreement budget is more detailed than the application budget, and certain costs may have changed since the filing of your grant application and certain other adjustments to your project may be necessary as it develops. Grantees should submit a revised budget for consideration as part of the grant agreement execution process, placing expenses in the appropriate categories. If the Grant Agreement Execution process has already occurred, see 2. 32 guidance, directly above.

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2.34 Is there any reason we can't request all funds up front if we expect to use all funds awarded?

The State will release funds in installments throughout the performance period. For instance, if your performance period ends on December 31, 2024, the last request for reimbursement needs to be made by June 1, 2024, to receive payment by the end of the performance period. If you expect to use all funds awarded by December 31, 2022, you may request the entire amount in the first payment request.

In looking at Attachment B in the grant agreement, what amount of cost share (e.g. match) is required, if any?

No cost share or matching funds is required. However, if you included cost share or matching funds in the budget you submitted with your grant application, then you should include those amounts in Attachment B, Budget of the grant agreement.

2.35 Our budget also shows costs in the Match column. Does our organization have to document and report on those expenditures as well? Are we required to meet or exceed the Match amount shown?

Yes, if the grantee identified cost-share in their executed agreement, Attachment B-Budget, this information must be reported on the Semi-Annual Report and Payment Request. The total amount of expenditure per category should be entered in Column 6 of the Budget Worksheet, as of the date that the Semi-Annual Report and Payment Request is prepared.

2.36 Is there a list of eligible or allowable expenses?

Article 5 of your grant agreement defines "eligible expenses" and provides examples of ineligible ones. Please review carefully and contact program staff with any questions. . DOA reserves the right to seek reimbursement of any Grant Award funds expended on ineligible expenses.

2.37 Do we need to track staff time if we are not charging staff time to the grant?

No, you do not need to track staff time if it is not funded through the grant award.

2.38 Are we required to keep timesheets showing the amount of time staff spend working on grant activities in order to charge that portion of their salary and benefits to the grant award?

The portion of salaries and benefits of executive and administrative employees who perform work on grant activities may, at the grantee's option, be charged to the "Indirect Costs" line if it is included in your Attachment B, Budget. Time spent by other employees who work on grant-related work must keep timesheets recording all time for work charged to the grant award consistent with your Attachment B, Budget. If you do not plan to charge staff time to the Grant, then you do not need to track staff time.

2.39 Will we be required to submit expense tracking that includes itemized receipts?

Yes. Grantees are required to retain receipts for all expenses charged to their grant. However, receipts are not required to be provided as part of the semi-annual payment request and reporting. Grantees should expect to provide the Program with general ledger information and receipts as part of the Program's monitoring activities and/or if the Program has questions about individual expenses. See Articles 16 and 18 of the grant agreement for more detail.

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Audits

2.40 I heard a quick mention of “will be audited” during the webinar. Please describe what/when or any guidance related to audit.

Grantees that expend more than \$750,000 of their grant funds in a single fiscal year will be required to have a certified annual audit performed utilizing Generally Accepted Accounting Principles and Generally Accepted Auditing Standards. Audit reports will be due to the Program within the earlier of 30 calendar days after receipt of the auditor’s report(s), or nine months after the end of the audit period.

In addition, even if a grantee is not required to obtain an audit because their spending of grant funds is less than \$750,000 in a single fiscal year, any audit of their financial statements that they obtain as a result of their regular practices must be shared with the Program. Grantees also may be subject to a compliance audit or review conducted by the Program or an “agreed-upon procedures” engagement with an auditor, at the Program’s discretion. Grantees should be prepared to demonstrate compliance with the requirements of their grant agreement (e.g., through submission of expenditure information and/or documentation, site visits, etc.). Note that federal audit requirements do not apply to recipients of DBA Grant awards in light of updated Treasury guidance.

2.41 If we have additional Federal funds, but without ARPA would have had less than \$750,000 in Federal Expenditures, are we required to do a Single Audit or would the additional funds not be considered at all for these purposes?

If grantees have additional federal funds that, when adding in ARPA funds under this grant agreement, equals \$750,000 or more of expended funds in a single fiscal year, a single or program-specific n audit is required.

Where all federal funds expended are in accordance with this grant agreement, Grantees that expend more than \$750,000 of their ARPA grant funds in a single fiscal year will be required to have a certified annual audit performed utilizing Generally Accepted Accounting Principles and Generally Accepted Auditing Standards. Audit reports will be due to the Program within the earlier of 30 calendar days after receipt of the auditor’s report(s), or nine months after the end of the audit period.

In addition, even if a grantee is not required to obtain an audit because their spending of grant funds under this grant agreement is less than \$750,000 in a single fiscal year, any audit of their financial statements that they obtain as a result of their regular practices must be shared with the Program. Grantees also may be subject to a compliance audit or review conducted by the Program or an “agreed-upon procedures” engagement with an auditor, at the Program’s discretion. Grantees should be prepared to demonstrate compliance with the requirements of their grant agreement (e.g., through submission of expenditure information and/or documentation, site visits, etc.). Note that federal audit requirements do not apply to recipients of DBA Grant awards in light of updated Treasury guidance.

2.42 If my organization is not required to perform an audit as we have not spent more than \$750,000, but perform our own financial review, do we need to submit our financial review to the DOA within 30 days of completion?

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Correct. See response to Question 2.40. Regardless of the amount of the Grant Award Grantee expends in a single fiscal year, if an organization conducts an audit of its financial statements, it must provide a copy of the report to DOA within 30 days of receiving the report. Audit reports should be provided to DOA by emailing them to the program mailbox.

Scope of Work

2.43 Must we strictly adhere to the scope of the project as described in our grant application? Can we amend the timeline for our project?

Proposed changes to the scope of a project will be evaluated on a case-by-case basis. A change in scope may be permitted if it: i) is consistent with the overall project described in the grant application, and ii) would not increase the total grant award amount, and iii) is consistent with federal requirements and all other applicable laws. All expenses must be incurred before December 31, 2024. If you believe your proposed change of scope or timeline meets these criteria, you should include the revised description in the Scope of Work or timeline you submit as Attachment A to your grant agreement.

2.44 Our biggest challenge has been in recruiting staff. We have had staff take a leave of absence. While we have been recruiting staff, we have discovered that we may need different staff than originally anticipated to meet the program objectives. Therefore, we need to revise our work plan. Any advice?

See response to Question 2.43. If the number of staff changes or there are some other programmatic changes that deviate from the Scope of Work in your Grant Agreement, once you have identified these changes, you should submit a request for modification to the program mailbox. Staff will follow up with questions and any documents needed to process this request.

Affirmative Action

2.45 Is evidence of compliance with the Affirmative Action processes/documents/data required?

Awards estimated to be over fifty thousand dollars (\$50,000) require the submission of a written affirmative action plan by a grantee. Grantee's subcontractors must also comply with this requirement. DOA staff will work with grantees' subcontractors to ensure compliance with this requirement. Watch for further instructions from Program staff regarding this topic.

2.46 We just added our 50th employee this week. We previously had a waiver on file with the Department of Administration that was submitted in 2021, but now that we are at 50 employees, we know we will need to create an Affirmative Action plan. Is there a deadline by which we would need to complete this, or is it sufficient for us to be "in progress" for now?

The Program will confirm the existence of a current waiver and reach out if additional information is necessary. A grantee is required to submit an updated Affirmative Action Plan to the State's Contract Compliance Program at DOADEOSBOPPrograms@wisconsin.gov when their circumstances have changed.

Reporting Requirements

2.47 Regarding outcomes and measures during past and planned periods – what will be required of grantees and by whom and when are those determined/defined? What metrics/outcomes is DOA looking for in

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this? Is it number of businesses served? If so, do you have ideal metrics you'd like to be hit to ensure we are fulfilling our obligations?

Given the wide variety of projects and services being undertaken by the Diverse Business Assistance grantees, the outcomes and measures of success will vary by grantee. Attachment C – Semi-annual Report and Payment Request Form requires grantees to provide a description of their project activities during the past reporting period and a description of project activities for the upcoming reporting period. Grantees should provide details related to the project activities that are funded by the grant (personnel and otherwise) and consistent with the project described in the grant application and specifically outlined in the Scope of Work (Attachment A). Grantees are encouraged to include descriptions of the goals they are seeking to achieve and data demonstrating their success.

The Program may require the submission of additional information regarding outcomes and measures on a case-by case basis.

2.48 Assuming there is a final report requirement, when will a format for a final report be available?

At present, all reporting will be performed as part of the Semi-Annual Report and Payment Request Form. If the Program modifies the reporting requirements it will notify grantees in advance of any reporting deadline, including any Final Report that grantees may be required to submit.

Miscellaneous

2.49 Has the funding been defederalized?

No. The funding is provided by the federal State and Local Fiscal Recovery Fund and is subject to federal law and certain federal regulations. However, pursuant to recently revised Treasury Department guidance, the federal requirements of 2 CFR Part 200 (Uniform Guidance) no longer apply to grantees under the Diverse Business Assistance program. See First Amendment to your grant agreement for more details.

2.50 Indirect costs – do indirect costs apply to any current contract/employee for HR who will also be administering training to the program recipients? How do we calculate indirect cost rates for the project budget? What happens if you have an existing Federal indirect cost rate? Can you clarify indirect costs?

Administrative (indirect) costs are defined in the Attachment B – Budget cost categories and are those costs incurred by the Grantee for a common purpose that are not readily assignable to a specific project as a direct cost. Typically, administrative (indirect) costs are general costs of operation, such as the costs of operating and maintaining facilities, depreciation on buildings and equipment, and salaries and expenses of executive officers, personnel administration, and accounting. Therefore, these costs benefit more than one cost objective or project.

Although Federal regulations regarding “indirect costs” no longer apply, DOA will continue to allow Grantees to recover for administrative (indirect) costs if they so choose under a framework similar to the one employed by the federal government.

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If you have an existing Federal indirect cost rate, that rate should be used to calculate administrative (indirect) costs for the project budget. If not, then you may use an administrative cost rate of up to 10% of the Total Direct Costs (i.e., 9.1% of the total Grant Award).

Grantee is not required to include an amount on the Administrative (indirect) costs budget line. Notably, if you decide to include administrative (indirect) costs in your budget, you must ensure that those costs are not also included in other lines of your budget, to avoid double billing.

2.51 Are any additional documents required from organizations during the grant agreement process that DOA will be requesting in addition to the Affirmative Action statements?

Grantees may also be required to provide forms for set up in the State's financial system and additional information related to audits of your organization. The program will follow up with grantees for any additional information.

2.52 Does segregation of funds require physical separation or does the proper accounting segregation of funds suffice?

Grantees are required to maintain all Grant Award funds in a separate bank account used exclusively for the Grant Award funds or specifically identify the Grant Award funds in a separate internal account used to track all deposits, obligations, and expenditures of Grant Award funds. Grant Award funds may only be used only for purposes of Eligible Expenses, pursuant to the Grant Agreement. Grant Award funds cannot be intermingled with funds received from any other source, including but not limited to other grant awards received from the State pursuant to ARPA. See Article 15 and 16 of the Grant Agreement for more detail.

2.53 What happens if an organization has requested a Unique Entity ID from SAM.gov and has not yet received it in over four months?

Any inquiries regarding federal UEI (unique entity ID) numbers must be addressed at the federal level.

2.54 How do I access and save a copy of my agreements and reports for future access?

If you provide your email information, you can receive a copy of the approved and signed DocuSign Semi-Annual Report and Payment Request Form. However, this may take several weeks to receive. You can download a copy of the DocuSign document which will include the information that you will be submitting to the program staff by selecting the underlined down arrow icon in the center of your document. This icon is next to the printer icon and will allow you to save a copy of your submission for your records.

2.55 If we are using the Uniform Guidance for our other funding, should we follow this as we have this system already set up?

That is up to your organization. Treasury guidance has indicated that only a subset of Uniform Guidance requirements applies to ARPA grants in the revenue loss/government services expenditure category. That guidance can be found [here](#).

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2.56 We have an executed grant agreement, but is there any chance we would not receive all of the funds we were awarded or have to return any funds to DOA?

The grant award amount is the maximum you can receive under your grant agreement. Funds awarded must qualify as eligible expenses under Article 5 of your grant agreement. It is possible to not receive all of the funds you were awarded if you complete your project(s) outlined in the grant agreement's Attachment A, Scope of Work and your actual expenditures are less than what was indicated on Attachment B, Budget. See also responses to Questions 2.26 and 2.27.

In addition, the Department can require reimbursement of award funds under the grant agreement for circumstances, such as, but not limited to, misuse, misappropriation, violation of the Grant Agreement, and payment of ineligible expenses. Article 18 of the Grant Agreement addresses the need to maintain copies of all documents related to Grantee's participation in the program, including but not limited to all documents relating to goods and services purchased using the grant award funding.

2.57 Is there a specific design desired for the complaint log?

No. The complaint log is required by federal law and is described in Attachment F of the grant agreement, which provides:

Grantee shall maintain a complaint log and inform the Department and the Department of Treasury of any complaints of discrimination on the grounds of race, color, or national origin, and limited English proficiency covered by Title VI of the Civil Rights Act of 1964 and implementing regulations and provide, upon request, a list of all such reviews or proceedings based on the complaint, pending or completed, including outcome. Grantee also must inform the Department and the Department of the Treasury if Grantee has received no complaints under Title VI.

At a minimum, the complaint log should include the following information: date of complaint; name of complainant; type of complaint (race, color, etc.); actions taken in response to the complaint; and information regarding reviews and proceedings based on the complaint.

2.58 Will there be support for organizations unaccustomed to receiving large government grants? For example, our organization does not have a "Compliance Officer".

Yes, technical assistance will be provided to grantees. More information is forthcoming.

2.59 Will there be any publications about this award that will feature awardees and their funded activities?

The Program would love to tell everyone about your organizations' successes and achievements. Please include them in your semi-annual reports to the Program and feel free to submit them to the Program email address.

2.60 Are there any requirements around the types of background checks that volunteers and staff must undergo to work with clients?

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The Program does not require grantees to perform any specific type of background check on its staff and volunteers. However, Article 9(i) of the grant agreement requires each grantee to certify that the following is true:

Grantee and each of Grantee’s officers and directors, and each of its employees who will perform work funded with the Grant Award, during the four years preceding Grantee’s execution of this Grant Agreement have not been convicted of or had a civil judgment rendered against them for: i) commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local government) transaction; ii) violation of federal or state antitrust statutes; iii) commission of embezzlement, theft, forgery, bribery, falsification or destruction of records; iv) making a false statement; or v) receiving stolen property.

Grantees must obtain sufficient information to ensure that they can truthfully make this certification.

2.61 What expectations or restrictions are there, if any, about supplanting funds, and if these funds can go towards expenses that are currently budgeted?

Article 20 of the Grant Agreement prohibits the duplication of payment or reimbursement from another funding source. The Diverse Business Assistance Grant Program is intended to pay costs that are not already funded by other federal or state grant programs. However, if a particular project expense is only partially funded by a different source, you are free to use your Diverse Business Assistance funds to pay for the remainder of that expense.

Version #	Date Issued	Updated Information
Version 1.0	1/13/2023	
Version 2.0	3/13/2023	2.2, 2.4, 2.5, 2.6, 2.10, 2.14, 2.15, 2.16, 2.17, 2.18, 2.28, 2.30, 2.31, 2.32, 2.34, 2.35, 2.36, 2.37, 2.38, 2.39, 2.40, 2.41, 2.42, 2.44, 2.46, 2.49, 2.50, 2.54, 2.55, 2.56, 2.57, 2.58, 2.59, 2.60, 2.61