



DIVERSE BUSINESS INVESTMENT GRANT PROGRAM GUIDE

Version: March 13, 2023

1.0 GENERAL INFORMATION

1.1 Introduction

The purpose of this grant program is to provide funding to Community Development Financial Institutions (CDFIs) to support grants and forgivable loans to Diverse Businesses, including those in qualified census tracts, underserved communities, or other areas 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 with DOA should be directed to the following email address: DiverseBusinessInvestment@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 performance period, records sufficient to demonstrate that the expenses were in compliance with obligations under federal and state law as well as the grant agreement provisions.

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-2037), the grant agreement and any other related material will be made available for public inspection in accordance with applicable Wisconsin law.

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

1.7 Compliance with Applicable Law

As outlined in the grant agreement, grantees are solely responsible for demonstrating that payments they received under the Program meet the eligibility requirements set forth under the agreement, state and federal law, and state and federal guidance. Grantees agreed 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 paying the ineligible amounts (plus any assessed interests, 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 small or micro businesses, 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 Investment (“DBI”) Program. These answers have been revised due to recent guidance from the U.S. Department of the Treasury that significantly reduced the number of federal regulations applicable to the Program.

If you do not believe your question has been answered below, or if you have additional questions, please submit your follow-up to: DiverseBusinessInvestment@wisconsin.gov

Grant Agreements

2.1 When will grantees receive the DocuSign grant Agreements?

Grant Agreements are being routed to grantees on an ongoing basis after each grantee’s capability assessment and any requests for additional information are completed.

2.2 When will grant agreements be executed and when will we receive the executed grant agreements?

Grant Agreements will be executed following a review of the Grant Application and Grant Agreement and when capability assessments and any requests for additional information are completed. Grant agreements can be executed shortly after you receive the agreement via DocuSign so long as DOA has all the relevant information. Upon receipt of the DocuSign grant agreement, grantees should complete all required fields, including the Scope of Work and Budget, and submit the agreement to the Program at their earliest convenience. Although the Program will soon issue an amended grant agreement reflecting changes made in response to recent Treasury guidance, the Program recommends that grantees execute the current version of the agreement in order to avoid delays in receiving grant funds. If you have questions about the grant agreement, please send an email to the Program at: DiverseBusinessInvestment@wisconsin.gov.

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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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 Trainings

2.4 Is there a specific contact person for each grantee?

There is not a specific contact person for each grantee. Any questions should be directed to the program mailbox for this grant. The program email is DiverseBusinessInvestment@wisconsin.gov. Program staff monitor the mailboxes and will respond as quickly as possible. If you are in need of immediate assistance or would like to speak to program staff over phone, please indicate this in your email.

2.5 How should we change information such as the authorized signatory on the grant agreement, the DocuSign contact, or the primary point of contact for the program?

Please send an email to the program email box (DiverseBusinessInvestment@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 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.

2.6 Can staff time for attending required DOA trainings be covered by grant funds? Are video links to trainings available?

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

Disbursement of Grant Award Funds

2.7 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 for payments 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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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.

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

Generally, no. See Question no. 2.7 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.

2.9 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 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.

2.10 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.

2.11 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 How long will it take to reimburse the grantee after a semiannual payment request is made?

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. For payment requests that are incomplete or require additional information, the time period may be longer.

2.13 What time period will the first grant disbursement cover and what are the fiscal years that are assigned to the specific months outlined for submitting reimbursement?

The first grant disbursement will cover 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 will cover eligible expenses 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.

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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.

2.14 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.

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

No.

2.16 After the Initial Payment Request and first disbursement, will we be permitted to seek reimbursement if our advance does not cover all of our costs in a reporting period?

Yes. The Program recognizes that changed circumstances may cause you to incur costs more quickly than expected. As long as the expenses are for eligible costs, they can be submitted for reimbursement in your next Semi-Annual Report and Payment Request Form. However, the program will not be distributing any additional funds, so the overall amount of your award cannot and will not be adjusted.

2.17 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.

2.18 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?

Grantees can estimate expenditures through the end of the performance period, but they are required to provide their actual expenditures on the subsequent Payment Requests in Column 3 of the Budget Worksheet. If you would prefer to not use estimates, you can fill 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 on 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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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.

2.19 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.

2.20 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.

2.21 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

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

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.

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

Eligible personnel costs will be reimbursed even if incurred before execution of the grant agreement, but only for eligible expenses on or after March 3, 2021.

2.24 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 of 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.

2.25 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.

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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 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.

Procurement

2.27 Are grantees required to follow any particular procurement requirements when purchasing goods or services with grant funds?

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 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: DiverseBusinessInvestment@wisconsin.gov.

2.28 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 2.27 above.

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

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.

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

Budgets

2.30 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.

2.31 You mentioned the possibility of resubmitting budgets. What is the process and what limitations do you have on this?

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.

2.32 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 2.31 guidance, directly above.

2.33 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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

expect to use all funds awarded by December 31, 2022, you may request the entire amount in the first payment request.

2.34 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. Do 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 Are the indirect costs up to 10% of the subtotal or 10% of the total grant award?

Administrative(indirect) costs are costs incurred by the Grantee for a common or joint purpose that benefit more than one cost objective or project and are not readily assignable to specific cost objectives or projects as a direct cost. Typically, administrative(indirect) costs are generable 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.

If the Grantee has an existing Federal indirect cost rate, that rate should be used to calculate administrative(indirect) costs for the project budget. If not, then the Grantee 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.

2.38 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.

2.39 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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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.

2.40 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.

Audits

2.41 What is the guidance related to audits, and if audits are required, when are they expected to be completed? What if we have additional Federal funding?

In accordance with the 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.

Where grantees expend \$750,000 or more in combined federal funds (including any other federal funds in addition to funds awarded under this grant agreement) in a single fiscal year, a single or program-specific audit is required.

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 NIF 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?

Correct. See Response to Question 2.41. 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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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, 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?

Given the wide variety of projects and services being undertaken by the Diverse Business Investment 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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

the upcoming reporting period. Grantee should provide details related to the project activities that are funded by the grant (personnel and otherwise) 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 the 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 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.

2.50 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 Investment program. See First Amendment to your grant agreement for more details.

2.51 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](#).

2.52 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 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 response to Question 2.26.

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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.

2.53 Do we need a separate bank account for any advances we receive under this grant?

Per Article 15 of the Grant Agreement, the Grantee shall 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. Additional requirements of Grantee's financial management system are set forth in Article 16 of the Grant Agreement.

2.54 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.

2.55 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.

2.56 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.

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

DIVERSE BUSINESS INVESTMENT - PROGRAM GUIDE

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.

2.58 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 Investment 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 Investment Grant funds to pay for the remainder of that expense consistent with the terms and conditions of the grant agreement.

Version #	Date Issued	Updated Information
Version 1.0	1/13/2023	
Version 2.0	3/13/2023	2.3, 2.4, 2.6, 2.7, 2.9, 2.17, 2.18, 2.19, 2.20, 2.21, 2.24, 2.25, 2.28, 2.29, 2.30, 2.31, 2.32, 2.33, 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, 2.51, 2.52, 2.53, 2.54, 2.55, 2.56, 2.57, 2.58