

**08.25  
&  
08.28**



**RHODE  
ISLAND**

## **RHODE ISLAND CAPITAL PROJECTS FUND**

Community Learning Centers Municipal Grant

**GRANT MANAGEMENT GUIDANCE**

# TREASURY REQUIREMENTS - COMPLIANCE

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CPF reporting templates from U.S. Treasury and their ongoing review of the grant program indicate a high level of scrutiny and oversight on compliance issues.

Treasury guidance is dynamic and evolving constantly so please be sure to attend all information sessions and stay in close contact with the PRO team.

**Labor Practices:** Maintain documentation on all contractors and subcontractors and their compliance with local, State, and Federal labor laws.

**Procurement:** Competitively solicit all services and materials for the capital project and maintain documentation on specifications, RFPs, etc.

**Budgeting:** Use value engineering clauses in contracts for construction projects to offer reasonable opportunities for cost reductions.

# TREASURY REQUIREMENTS – COMPLIANCE

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- Projects funded by the Capital Projects Fund must comply with all applicable federal environmental laws. Projects must comply with local building and planning regulations.
- Projects must reach substantial completion before December 31, 2026. Substantial completion is defined as the date on which the Project can fulfill the primary operations that it was designed to perform, delivering services to end-users. **At substantial completion, service operations and management systems infrastructure must be operational.**
- PRO is asking all subrecipients to plan their project schedules such that **all construction activity is completed by October 31, 2026.**
- **If construction is not complete and/or ALL three programs are not operational by Treasury's deadline, the entire CPF allocation for that project will have to be returned.**

# TREASURY REQUIREMENTS – LABOR PRACTICES

- Projects (....) may provide certification of compliance with Davis-Bacon Act. If not provided, **Treasury requires quarterly reporting on wages and benefits information for all contractors, subcontractors, and workers on the project.**
- Projects (...) may provide certification that a Project includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)). If not provided, Treasury will require a detailed workforce continuity plan.
- Among other requirements contained in [2 C.F.R. 200, Appendix II](#), **all contracts made by a Recipient or Subrecipient in excess of \$100,000 that involve employment of mechanics or laborers** must include a provision for compliance with certain provisions of the [Contract Work Hours and Safety Standards Act, 40 U.S.C. 3702 and 3704](#), as supplemented by Department of Labor regulations ([29 C.F.R. Part 5](#)).
- Treasury will seek information from Recipients on their workforce plans and practices related to CPF Projects, as well as information about subcontracted entities.

# TREASURY REQUIREMENTS - PROCUREMENT

Included below are some examples from the federal regulations for procurement that apply to the CPF grant. For more information, please refer to [§ 200.317 Procurements by states](#).

- The non-Federal entity **must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations** and the standards of this section, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in [§§ 200.317](#) through [200.327](#).
- The non-Federal entity must take all necessary affirmative steps to assure that **minority businesses, women's business enterprises, and labor surplus area firms** are used when possible.
- As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide **a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States** (including but not limited to iron, aluminum, steel, cement, and other manufactured products).

# TREASURY REQUIREMENTS – CPF COMPLIANCE

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The following criteria must be met to be eligible to receive CPF monies:

- **Community Engagement:**

- Show that the proposed project was appropriately vetted by diverse and representative community stakeholders.


- **Critical Need:**

- Present data and/or evidence supporting the critical need for the proposed project.

- **Program support:**

- Demonstrate ability to provide services that jointly and directly enable education, work, and health monitoring for **at least five years** post construction or renovation.

# PROCESS & TIMELINE

DATE / DURATION	STEPS
AUGUST 3	GRANT APPROVAL ANNOUNCED
AUGUST 7	GRANT APPLICATION STAGE 1 OPEN
AUGUST 15	STAGE 1 DUE
AUGUST 21-31	MUNICIPAL OUTREACH 
SEPTEMBER 1	GRANT APPLICATION STAGE 2 FORMS OPEN
OCTOBER 6	STAGE 2 APPLICATION FORMS DUE
NOVEMBER	ATTESTATIONS FROM QUALIFYING MUNICIPALITIES
NOVEMBER-JANUARY	SUBAWARD AGREEMENTS FORMALIZED
DECEMBER-JANUARY	1 <sup>ST</sup> GRANT PAYMENT TRANSFERRED TO MUNICIPALITIES

# PROJECT PLAN – INELIGIBLE PROJECT COSTS

- ❌ Operating expenses;
- ❌ Grant administration costs (developing grant proposal, administering the grant, grant reporting, etc.);
- ❌ Short-term operating leases;
- ❌ Satisfaction of any obligation arising under or pursuant to a settlement agreement, judgment, consent decree, or judicially confirmed debt restructuring plan in a judicial, administrative, or regulatory proceeding; or
- ❌ Expenses to support or oppose collective bargaining.  
This does not affect the ability to use funds to comply with 41 C.F.R. 60-1.4 (equal opportunity clause)



# PROJECT PLAN – ELIGIBLE PROJECT COSTS

- ✓ Pre-project development costs and uses including data-gathering, feasibility studies, community engagement and public feedback processes\*, equity assessments and planning, and needs assessments; permitting, planning, architectural design, engineering design, and work related to environmental, historical, and cultural reviews;

Project costs incurred after 8/3/2023 will be considered eligible upon successful formalization of subaward agreement

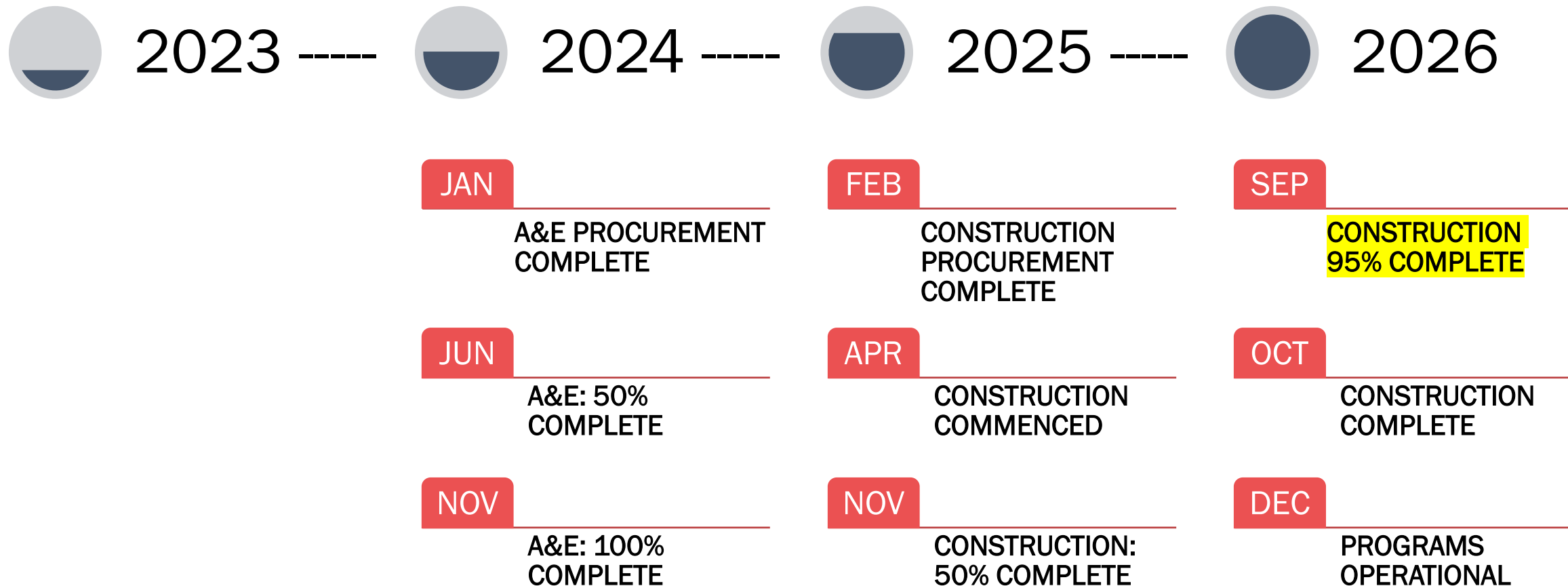
*Treasury categorizes costs associated with community engagement activities in connection with the development of the Grant Plan (including Program Plans) as program administrative costs. All other costs associated with community engagement activities (e.g., seeking public comment related to a project's location, design, or environmental impacts) should be categorized as project costs.*

# PROJECT PLAN – ELIGIBLE PROJECT COSTS

- ✓ Costs of repair, rehabilitation, construction, improvement, and acquisition of real property (land, building, vehicles), equipment (e.g., devices and office equipment), and facilities (e.g., telecommunications equipment);
- ✓ Cost of long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements and capital leases;
- ✓ Personnel costs including salaries and fringe benefits for staff and consultants dedicated solely to the Capital Project (such as project managers, program directors, subject matter experts, equity consultants, financial analysts, accountants, and attorneys);

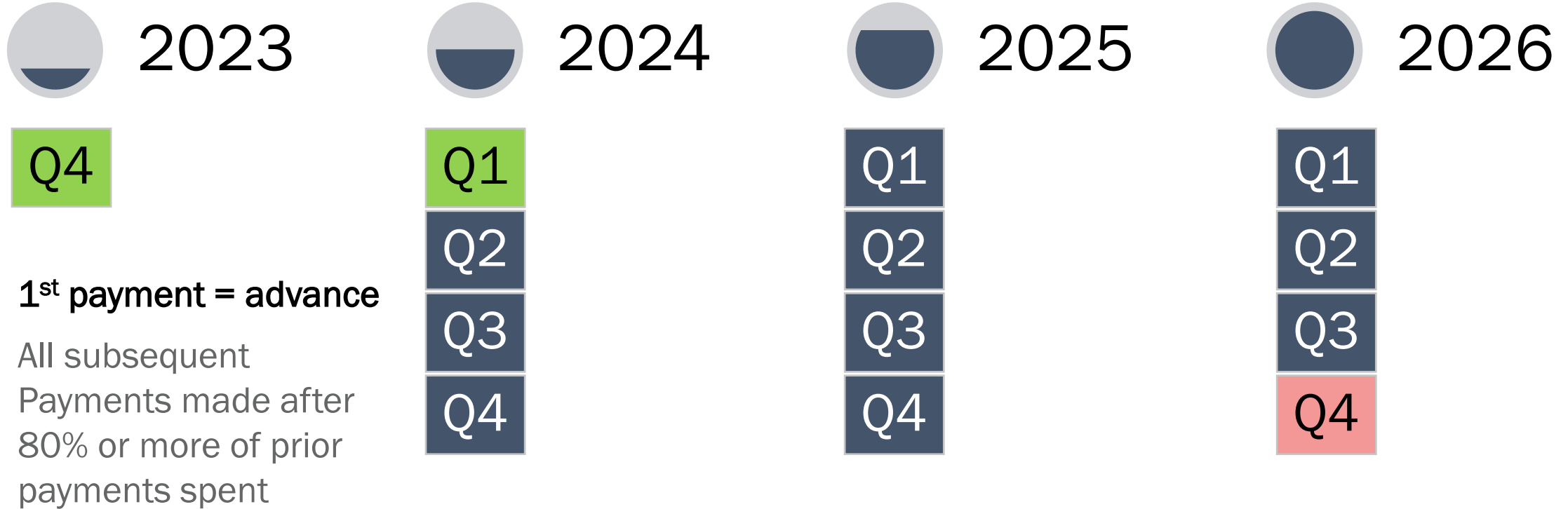
# STAGE 2 – PROJECT PLAN

## SCHEDULE AND MILESTONES



# STAGE 2 – PROJECT PLAN

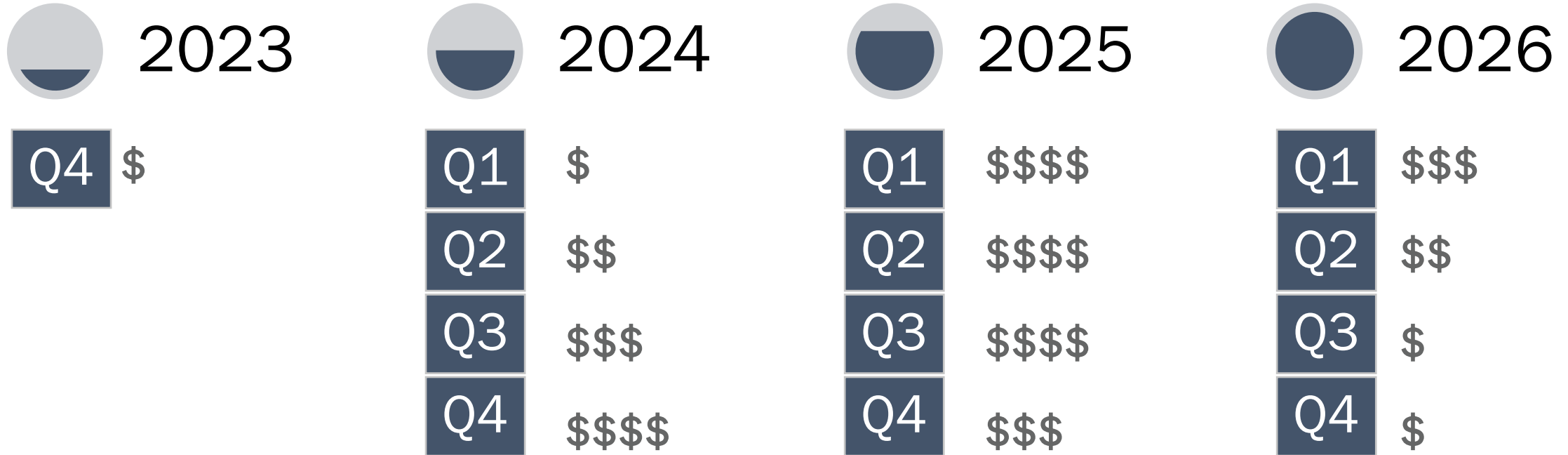
## PAYMENTS



Per U.S.Treasury’s cash management policy, PRO will only transfer each payment in accordance with potential cash need for the next 1-3 months.

# STAGE 2 – PROJECT PLAN

## BUDGET



- Spread project costs across all quarters in the project schedule. Budget must correspond to project progress and deliverables.
- RECOMMENDATION: Plan minimal payments in Q3 and Q4.

# STAGE 2 – PROJECT PLAN

## BUDGET TEMPLATE

		2023	2024				2025				2026			
		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Total Project Cost	\$600,000	\$13,000	\$18,500	\$32,000	\$32,000	\$33,000	\$38,000	\$39,000	\$74,000	\$75,000	\$57,000	\$53,000	\$48,500	\$87,000
<b>CPF Community Learning Centers</b>														
<b>Municipal Grant</b>	\$300,000	\$10,000	\$15,000	\$25,000	\$25,000	\$25,000	\$25,000	\$25,000	\$50,000	\$50,000	\$20,000	\$15,000	\$10,000	\$5,000
<b>Supplementary Capital Funding</b>	\$300,000	\$3,000	\$3,500	\$7,000	\$7,000	\$8,000	\$13,000	\$14,000	\$24,000	\$25,000	\$37,000	\$38,000	\$38,500	\$82,000
	<i>XYZ grant</i>	\$50,000	\$1,000	\$1,500	\$2,000	\$2,000	\$3,000	\$3,000	\$4,000	\$4,000	\$5,000	\$5,000	\$6,000	\$6,500
	<i>Name of Source 2</i>	\$250,000	\$2,000	\$2,000	\$5,000	\$5,000	\$5,000	\$10,000	\$10,000	\$20,000	\$20,000	\$32,000	\$32,000	\$32,000
<i>insert rows here to add different sources of funding that make up the local match</i>	\$0													

- Program budget must include all sources of capital funding.
- Program budget will have to be updated quarterly to reflect any new sources of funding.
- Quarterly reviews will compare projected budget with actual expense trajectory.

# POST AWARD - MONITORING

IN ADDITION TO MONTHLY PHONE CHECK-INS AND AD-HOC OUTREACH, PRO WILL CONDUCT SITE VISITS & DESK REVIEWS TO SUPPORT THE REPORTING REQUIREMENTS OF THE CPF GRANT.

## SITE VISITS

## DESK REVIEWS

- I – Upon subaward finalization  
NOV-DEC 2023 /MAY-JUN 2024\*\*
- II – NOV-DEC 2024\*
- III – MAY-JUNE 2025\*\*
- IV – NOV-DEC 2025\*
- V – MAY-JUN 2026\*\*
- VI – NOV-DEC 2026\*  
Project closeout

- I – Upon project initiation  
FEB-MAR 2024
- II – AUG-SEP 2024
- III – FEB-MAR 2025
- IV – AUG-SEP 2025
- V – FEB-MAR 2026
- VI – AUG-SEPT 2026  
At construction=95%

\* PRO review of project viability.

\*\* In preparation for annual performance report

All other visits and reviews scheduled to prepare for quarterly performance and expense report

# POST AWARD - REPORTING

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## UPCOMING REPORTING DEADLINES:

JANUARY 31, 2024 \_P&E REPORT

APRIL 30, 2024 \_\_\_\_\_P&E REPORT

JULY 31, 2024 \_\_\_\_\_P&E REPORT + ANNUAL PERFORMANCE REPORT

OCTOBER 31, 2024 \_P&E REPORT



# POST AWARD - REPORTING

**Project and Expenditure Report (P&E):** Quarterly report - Projects funded, obligations, expenditures, project status, outputs, performance indicators, and other information. At a minimum, State, territory, and freely associated state recipients should collect and be prepared to provide the following for quarterly project and expenditure reports:

- Project description;
- Project location(s);
- Project start and end date;
- Project status;
- Project expenditures;
- Number of households, businesses, and anchor institutions to be served;
- Location of communities to be served; and
- Description of how equity and community engagement activities informed project selection and design.

# POST AWARD - REPORTING

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**Performance Report:** At a minimum, State, territory, and freely associated state recipients should collect and (...) provide the following for annual reports:

- Narrative response outlining **progress** towards objectives
- **Number of households served** by the capital asset upon project completion (e.g., number of households with access to work, education, and health monitoring activities and services offered, etc.);
- Summary of **community engagement and public participation activities** conducted to solicit input from and/or partner with communities from the past year that informed the definition of critical need for program(s) and projects; and
- Summary of **future community engagement and public participation activities** planned for the upcoming year that will continue to shape program and project selection, implementation, and operation.

# RESOURCES

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## U.S. TREASURY RESOURCES:

- [Capital Projects Fund Guidance](#)
- [FAQs](#)
- [Compliance and Reporting Guidance](#)
- [Uniform Guidance](#)

## STATE OF RHODE ISLAND RESOURCES:

- Governor's Office – Cheyenne Cazeault, Director of Municipal Affairs
- Pandemic Recovery Office – Paul Dion, Director; Sagree Sharma, CPF Administrator
- [PRO Website](#) – [CPF Webpage](#)
- [eCivis](#) (Training on 8/30 @ 1pm – PRO will email link to all team contacts)



# THANK YOU

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**RHODE  
ISLAND**