



State of Louisiana

JOHN BEL EDWARDS
GOVERNOR

June 25, 2019

ADDENDUM I

TO: ALL POTENTIAL PROPOSERS

RE: RFP #: 3000012849, Subrecipient Monitoring of Federal Subawards

PROPOSAL DUE DATE: JULY 10, 2019 @ 3:00PM

This addendum and associated attachment shall be considered part of the RFP. The revisions and additions in this addendum supersede the requirements in the advertised RFP.

I. QUESTIONS AND RESPONSES

1. **Q.** Can CPRA provide a copy of its “existing Subrecipient Monitoring Plan” for the proposers to review and consider during preparation of their submittals? The plan is referenced on Page 26 (Part II: Scope of Services, Item I) of the RFP.
A. See Section II, RFP Revisions.
2. **Q.** Can CPRA provide some indication of the level of effort involved for the scope of services cited in the RFP? Specific information related to number of grants, dollar value of grants, and number of subrecipients that will require monitoring will be helpful to better understand the staffing commitment that may be required.
A. CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months. The six (6) subawards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. CPRA expects to issue additional subawards in the future. The number and timeframe for award is indeterminable at this time. CPRA reserves the right to amend the contract, if it deems necessary, for additional subaward monitoring.
3. **Q.** Will the successful proposer for RFP # 3000012849 be allowed to pursue future projects with CPRA and provide other technical and/or professional consulting services (i.e. program/project management, environmental consulting, engineering, etc.) for projects that may be funded by the same funding source(s) that they are monitoring?
A. The successful proposer shall not provide services of any type to any subrecipient they are monitoring under the scope of this RFP. Eligibility for

the awarded contractor to pursue other services contracts opportunities with CPRA will be reviewed on a case-specific basis.

4. **Q.** Can you please provide a detailed listing of the Federal Grant Programs CPRA participated in that are subject to the Subrecipient Monitoring scope of this RFP?
- a. Federal Grant Program;
 - b. Effective date;
 - c. Grant Award Amount;
 - d. Status of Grant Program / Awards Disbursed

A. The immediate need pertains to the grants CPRA is applying for under the Gulf Coast Ecosystem Restoration Council’s Oil Spill Impact Program (CFDA 87.052) for CPRA’s Parish Matching Program. CPRA anticipates receiving six (6) awards within the next three to nine months. The six (6) awards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. Additionally, CPRA may apply for future grants under this federal grant program or under other federal grant programs during the term of this contract.

5. **Q.** Can you please provide a detailed listing of the CPRA Subrecipients for the Federal Grant Programs CPRA participated in that are subject to the Subrecipient Monitoring scope of this RFP?
- a. Subrecipient Entity Name;
 - b. Federal Grant Program;
 - c. Effective date of Subaward;
 - d. Grant Subaward Amount;
 - e. Status of Grant Subaward Program / Subawards Disbursed

A. CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months under the RESTORE Parish Matching Program. The six (6) subawards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. The subrecipients in this program are Parishes that:

- **Receive RESTORE funds under the Direct Component**
- **Contribute a portion of their own RESTORE funds towards a proposed project for state matching; and**
- **Include the proposed project in their RESTORE Multi-Year Implementation Plan.**

Projects selected for the Parish Matching Program are limited to integrated coastal protections and restoration projects that are in the Coastal Master Plan or consistent with the Coastal Master Plan.

CPRA expects to issue additional subawards in the future, but the number and timeframe for award is indeterminable at this time.

6. **Q.** Can you please provide a copy of the CPRA's existing Subrecipient Monitoring Plan?
- A.** See Section II, RFP Revisions.
7. **Q.** Can you please provide the estimated budget for the scope of services included in this RFP?
- A.** The estimated budget for the scope of services included in this RFP is \$200,000. However, CPRA will determine the actual contract value through the contract negotiation process with the selected Proposer.
8. **Q.** Can you please provide the name of the Firm currently providing Subrecipient Monitoring services to CPRA?
- A.** CPRA does not currently have a firm performing Subrecipient Monitoring Services.
9. **Q.** How many subrecipients are covered by the CPRA monitoring plan?
- A.** CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months. The six (6) subawards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. CPRA expects to issue additional subawards in the future, but the number and timeframe for award is indeterminable at this time.
10. **Q.** How many subrecipients are estimated to be monitored annually under this request for proposal?
- A.** CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months. The six (6) subawards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. CPRA expects to issue additional subawards in the future, but the number and timeframe for award is indeterminable at this time.
11. **Q.** The subcontracting language on page 31 of RFP requests the proposer specify the level of subcontracting to any Hudson Initiative certified firms. The RFP provides an assumed estimated contract value of \$200,000 estimated contract value. Is this amount the estimated project fee budget for the contract period?
- A.** Yes. However, CPRA will determine the actual contract value through the contract negotiation process with the selected Proposer.

12. **Q.** What is the project fee budget?
- A.** **The budget is estimated to be \$200,000. However, CPRA will determine the actual contract value through the contract negotiation process with the selected Proposer.**
13. **Q.** What federal awards are included for subrecipient monitoring?
- A.** **The immediate need pertains to the grants CPRA is applying for under the Gulf Coast Ecosystem Restoration Council’s Oil Spill Impact Program (CFDA 87.052) for CPRA’s Parish Matching Program. CPRA anticipates receiving six (6) awards within the next three to nine months. The six (6) awards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. Additionally, CPRA may apply for future grants under this federal grant program or under other federal grant programs during the term of this contract.**
14. **Q.** Is the internal subrecipient monitoring program a public document that we may access as we prepare our proposal?
- A.** **See Section II, RFP Revisions.**
15. **Q.** Is there an existing incumbent organization providing the requested services?
- A.** **No.**
16. **Q.** If yes, how long has the incumbent organization provided these services?
- A.** **Not Applicable.**
17. **Q.** Approximately how many subrecipients does the CPRA manage?
- A.** **This is a new effort. CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months.**
18. **Q.** Approximately how many subawards does the CPRA give out?
- A.** **CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months.**
19. **Q.** Will there be a single proposal selected, or will the state consider having multiple contractors?
- A.** **It states in Part I, Section 1.1 under Purpose, “CPRA will award one contract from this RFP.”**

20. **Q.** Can you elaborate on the “task order” process?
- a. Is this an indefinite delivery/indefinite quantity (IDIQ) contract?
 - b. Is a separate task order issued for each subaward?
 - i. If not, what is the general scope of a task order?
 - c. Might the state issue task orders to multiple contractors (not the same task order, but individual task orders)?
 - i. If yes, how is the distribution of these task orders determined?
- A.**
- a. **Yes, this is an indefinite delivery/indefinite quantity type contract.**
 - b. **A task order may be issued for one or more subrecipients, depending on the timing of CPRA’s need for services. For example, if CPRA issues two subawards at the same time, one task order may include both subawards. The task order will be negotiated with the Contractor.**
 - c. **No. It states in Part I Section 1.1, under Purpose, “CPRA will award one contract from this RFP.”**
21. **Q.** Does the CPRA anticipate or require that all work will be performed onsite at CPRA facilities (site visits, etc. excepted)?
- A.** **CPRA anticipates that most of the work will be performed at the Contractor’s facilities although some portion of the work will be performed at the subrecipient’s location or the project site location. The contractor will also be required to attend meetings, as needed, at CPRA’s office located at 150 Terrace Avenue, Baton Rouge, LA.**
22. **Q.** Does CPRA provide work facilities for contractor staff?
- A.** **CPRA is not providing work facilities for this contract.**
23. **Q.** How much of the current work effort for this process is done “on-site” in the state?
- A.** **This is a new work effort for CPRA.**
24. **Q.** Currently, how many workers in the CPRA are state workers and how many are contractors/subcontractors?
- A.** **CPRA does not currently have dedicated staff performing subrecipient monitoring services. CPRA does not currently have contractors or subcontractors performing subrecipient monitoring services.**
25. **Q.** Do CPRA staff manage some grants and the contractor manages other grants?
- A.** **CPRA staff manages all CPRA grants. This RFP does not include managing the grants awarded to CPRA.**

26. **Q.** If there is an incumbent will the new contractor have access to current systems that contain historic grant data to in order to migrate to tools required to support the program going forward?
- A.** **This is a new work effort for CPRA; therefore, there is no incumbent contractor, but the RFP gives a clear understanding of the support that the program will need.**
27. **Q.** Will contractor be provided access to appropriate state and/or incumbent systems and records related to active or archived grant/subaward records to support ongoing subrecipient monitoring?
- A.** **This is a new work effort for CPRA. Yes, CPRA will provide the selected contractor any records required to perform the Scope of Services in this RFP.**
28. **Q.** Under Section 3.2, at the top of page 31 of the RFP, roman numeral iv. indicates that subcontractor dollar-value calculations should be made on the basis of a \$200,000 “estimated contract value.” Is this the total anticipated budget for a three-year contract with proposer?
- A.** **The budget is estimated to be \$200,000. However, CPRA will determine the actual contract value through the contract negotiation process with the selected Proposer.**
29. **Q.** How many sub-recipients are anticipated to be monitored with assistance from proposer?
- A.** **CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months. Additionally, CPRA expects to issue additional subawards in the future, but the number and timeframe for award is indeterminable at this time.**
30. **Q.** What is the expected total contract value of all subawards to be monitored with assistance from proposer?
- A.** **The immediate need pertains to the grants CPRA is applying for under the Gulf Coast Ecosystem Restoration Council’s Oil Spill Impact Program (CFDA 87.052) for CPRA’s Parish Matching Program. CPRA anticipates receiving six (6) awards within the next three to nine months. The six (6) subawards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. Additionally, CPRA may apply for future grants under this federal grant program or under other federal grant programs during the time frame of this contract.**

31. **Q.** Are there any further details regarding the types of subawards to be monitored?
- A.** **The immediate need for subrecipient monitoring is for subawards that will be issued under CPRA’s RESTORE Parish Matching Program. Parishes that applied for these subawards were required to:**
- **Receive RESTORE funds under the Direct Component**
 - **Contribute a portion of their own RESTORE funds towards a proposed project for state matching; and**
 - **Include the proposed project in their RESTORE Multi-Year Implementation Plan.**
- Projects selected for the Parish Matching Program are limited to integrated coastal protections and restoration projects that are in the Coastal Master Plan or consistent with the Coastal Master Plan.**
32. **Q.** Does CPRA anticipate extensive on-site monitoring of subrecipients’ activities by proposer?
- A.** **The extent of on-site monitoring will be determined by the results of the selected contractor’s assessment of risk for each subrecipient.**
33. **Q.** How many federal awards and/or subawards are currently within the scope of this RFP?
- A.** **The immediate need pertains to the grants CPRA is applying for under the Gulf Coast Ecosystem Restoration Council’s Oil Spill Impact Program (CFDA 87.052) for CPRA’s Parish Matching Program. CPRA anticipates receiving six (6) awards and issuing six (6) corresponding subawards within the next three to nine months. Additionally, CPRA may apply for future grants under this federal grant program or under other federal grant programs during the term of this contract.**
34. **Q.** How much in federal funding is being administered under the in-scope awards?
- A.** **There are currently no subawards issued yet for the RESTORE Parish Matching Program. CPRA anticipates receiving six (6) awards within the next three to nine months. The six (6) subawards will total \$20,000,000, ranging from \$400,000 to \$6,700,000 each. Additionally, CPRA may apply for future grants under this federal grant program or under other federal grant programs during the time frame of this contract.**
35. **Q.** How many subrecipients are currently in-scope?
- A.** **CPRA anticipates issuing six (6) subawards to six (6) subrecipients within the next three to nine months. Additionally, CPRA expects to issue additional subawards in the future, but the number and timeframe for award is indeterminable at this time.**

36. **Q.** How geographically dispersed are current subrecipient population?
- A.** **The Parishes that are eligible for CPRA’s Parish Matching Program are required to be located in the State of Louisiana’s Coastal Zone. Parishes in the Coastal Zone can be located at <http://www.dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=928>.**
37. **Q.** Does CPRA intend that some of its personnel will retain responsibility for the development or execution of subrecipient monitoring activities or will all responsibility be outsourced to the selected Provider?
- A.** **CPRA expects that development and execution of all subrecipient monitoring activities will be outsourced. However, CPRA staff will expect to work closely with the Contractor to ensure the required services are being performed.**
38. **Q.** Per Section 1.8.1 Desirable Qualifications can you please elaborate on your definition of “Senior Level Experience”
- A.** **Senior Level Experience is 7 or more years of experience in monitoring subrecipients of federal grant awards with comprehensive knowledge of the federal requirements for subrecipient monitoring.**
39. **Q.** Regarding proposal submission, does CPRA have a requirement or preference on page limitation, font sizes, etc.?
- A.** **CPRA has no specific requirements or limitations, however, Proposers are encouraged to submit proposals in a concise, orderly fashion that includes complete, appropriate comment, documentation, and submittals to address the RFP requirements.**

II. RFP REVISIONS

Add the attachment to the RFP

Attachment XI: Subrecipient Monitoring Plan

Attachments: Subrecipient Monitoring Plan

END OF ADDENDUM I

Attachment XI



Coastal Protection and Restoration Authority

Subrecipient Monitoring Plan



Coastal Protection and Restoration Authority Subrecipient Monitoring Plan

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Coastal Protection and Restoration Authority

Subrecipient Monitoring Plan

I. Policy Statement

The Coastal Protection and Restoration Authority (CPRA) is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of Federal funds. The following policy applies when CPRA serves a Pass-through entity as defined at 2 CFR 200.74 and provides a subaward to a subrecipient to carry out part of a Federal program. Additionally, this policy addresses CPRA responsibilities and assists CPRA staff with ensuring that, in addition to achieving performance goals, subrecipients comply with applicable Federal laws and regulations and with the provisions of each subaward agreement.

II. Purpose

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically §200.331, requires pass-through entities such as CPRA to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient entity to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance. Failure to adequately monitor the compliance of subrecipients could jeopardize current and future funding.

III. Goals and Objectives

CPRA has the responsibility to monitor the programmatic and financial activities of its subrecipients in order to ensure: proper stewardship of Federal funds; achievement of performance goals (scope of work or specific aims); and compliance with the terms and conditions of the subrecipient agreement. The primary objectives of subrecipient monitoring are:

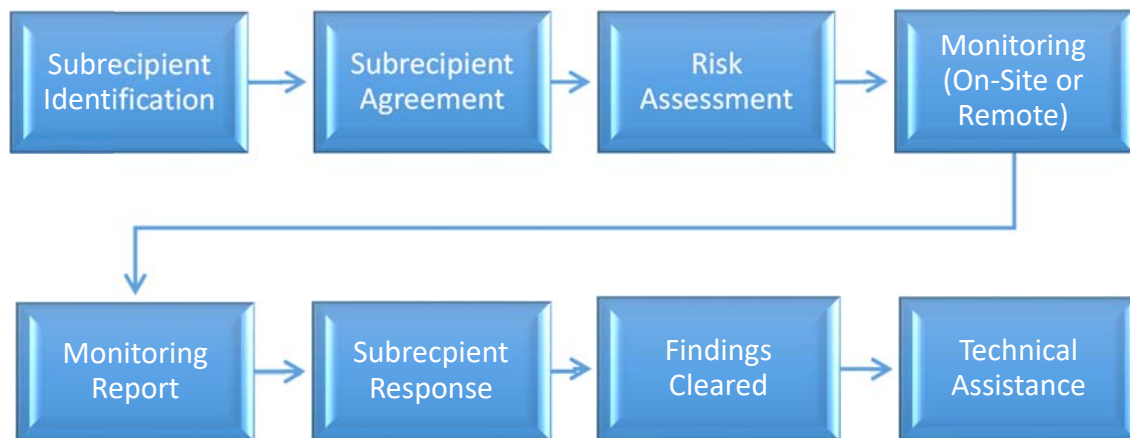
- To determine if a subrecipient is carrying out its activities in a timely manner and in accordance with the subrecipient agreement;
- To assess if the subrecipient has a continuing capacity to carry out the approved program or project;
- To identify potential problem areas and to assist the subrecipient in complying with applicable laws and regulations;
- To assist subrecipients in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training;
- To provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by subrecipients and not repeated;
- To ensure that required programmatic records are maintained to demonstrate compliance with applicable regulations and requirements;



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- To ensure expenditures of Federal funds are properly documented and made in accordance with applicable regulations and requirements;
- To verify subrecipients have audits, as required under 2 C.F.R. Part 200 Subpart F;
- If applicable, to review subrecipient agencies to determine if services are delivered in accordance with contract requirements as to type of services and number of units of service;
- If applicable, to review records of subrecipient agencies to determine if systems are in place to properly document the provision of services, client eligibility, and compliance with any other contract requirements;
- To consider whether the results of the subrecipient’s audits, on-site reviews, or other monitoring require adjustments to the subrecipient agreement; and
- To consider how to address subrecipient noncompliance (i.e., enforcement actions).

Diagram of Monitoring Process



IV. Subrecipient Identification

CPRA has to determine whether the entity receiving the Federal funding is a subrecipient or a contractor. As defined by 2 CFR 200.330, a subrecipient relationship exists when Federal funds are provided to an entity for the purpose of carrying out a portion of the scope of work or objectives of the Federal program or project. A contractor relationship exists when Federal funds are provided to an entity for the purpose of obtaining goods and services for CPRA’s own use and creates a procurement relationship with the contractor. The following chart identifies characteristics that define a subrecipient versus an entity that is hired to perform services or provide goods (a vendor or a contractor).



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Subrecipient	Contractor
Programmatic decision-making responsibilities	Provides goods & services as part of normal business
Performance is measured against program objectives	Goods & services are ancillary to programmatic activities
Responsible for Federal compliance requirements	Operates in a competitive environment
Uses funds to carry out a program for a public purpose	Uses funds to provide goods or services to CPRA
Mechanism = Subaward	Mechanism = Contract/Purchase Order

Not all of the characteristics need to be or will be present to determine whether the entity is cast as a subrecipient or a contractor; judgment should be used in each case. When subcontracting or subgranting, CPRA must determine if the relationship is one of a subrecipient or a contractor. The substance of the relationship is more important than the form of the agreement. For example: If CPRA uses a contract or purchase order to secure services to conduct part of the scope of work of a Federal program or project and the determination is that an assistance relationship exists, then the “contractor” is a subrecipient and the requirements of 2 CFR 200.330 through 2 CFR 200.332 will apply to the contract/purchase order.

V. Award Process

If CPRA determines that the entity is a subrecipient (2 CFR 200.93), CPRA will:

- Ensure the subrecipient is not suspended or debarred by the Federal government (2 CFR 200.213);
- Ensure the award is clearly identified to the subrecipient as a subaward;
- Ensure the agreement with the subrecipient provides the best information available to describe the subaward. Information to be provided, if available, includes the following:
 - Subrecipient name (must match registered name in DUNS);
 - Subrecipient’s DUNS number;
 - Federal Award Identification Number (FAIN);
 - Federal Award Date;
 - Subaward Period of Performance Start and End Date;
 - Amount of Federal Funds obligated by this agreement;
 - Total Amount of Federal Funds obligated to the subrecipient;
 - Total Amount of Federal funds committed to the subrecipient;
 - Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);



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- CPRA contact information;
 - CFDA number and name;
 - Identification of whether the award is Research & Development; and
 - Indirect cost rate for the Federal award (including the 10% de minimis rate for subrecipients without a Federally negotiated rate)
- Ensure the inclusion of all requirements imposed by the Federal and CPRA so that the subaward is used in accordance with Federal statutes, regulations and the award terms and conditions.
 - If applicable to the agreement, ensure the subrecipient has a federally recognized indirect cost rate, or if no such rate exists, either a rate negotiated between CPRA and the subrecipient or a de minimis indirect cost rate is used.
 - Ensure the subaward permits CPRA and auditor's access to subrecipient's records and financial statements.
 - Ensure terms and conditions regarding closeout are included.
 - Impose any specific award terms and conditions as needed.

VI. Risk Assessment of Subrecipients

As required under 2 CFR 200.331(b), the pass-through entity must perform a risk assessment related to its subrecipients. The results of this risk assessment should drive the extent of the monitoring activities performed by a pass-through entity on its subrecipients.

The pass-through entity may want to consider the following items when performing risk assessments of its subrecipients:

- Prior experience with the same or similar subawards;
- Results of previous audits;
- New personnel or new or substantially changed financial systems;
- Extent and results of other Federal awards monitoring;
- Complexity of the scope of work being performed; and
- Assessment of financial stability.

The results of the risk assessment process will provide the basis for developing a work plan and individual subrecipient monitoring strategies. This includes identifying the frequency of monitoring, the method of monitoring (on-site or desk review), programs and areas to be monitored, type of monitoring (in-depth or limited), areas of technical assistance and training needed, and resources needed.



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VII. Monitoring Process

For on-site monitoring, CPRA monitoring staff will contact the subrecipient to schedule a monitoring visit. The subrecipient will be informed of records to be reviewed. These records should be ready for review upon the monitor's arrival and available at a working space set up for the monitor.

Alternatively, CPRA may conduct desk review monitoring of program documents and records. In this instance, the subrecipient will be required to submit documents to CPRA monitoring staff for review.

A. Entrance Conference

CPRA monitoring staff meet with designated subrecipient officials to answer any questions regarding the monitoring process and meet appropriate subrecipient staff and/or consultants. Subrecipient staff responsible for the following areas should be available to assist with the monitoring process.

1. Staff responsible for general record keeping and reporting.
2. Staff responsible for preparing reimbursement requests, payroll, financial reporting and maintaining accounting records.
3. Staff responsible for Federal program compliance with the following areas as applicable:
 - a) Procurement regulations at 2 CFR 200.320 and Louisiana Public Bid Law;
 - b) Labor compliance requirements contained in the Davis-Bacon Act and Related Acts (DBRA);
 - c) Relocation assistance under the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended (URA);
 - d) Environmental compliance with the National Environmental Protection Act (NEPA);
 - e) Property standards as specified in 2 CFR 200.310 – 200.316;
4. Non-Discrimination requirements including but not limited to Title VI of the Civil Rights Act, Sex Discrimination, Age Discrimination, American with Disabilities Act, Equal Employment Opportunity, Title VII of the Civil Rights Act and Limited English Proficiency.

B. Review of Records

CPRA monitoring staff will review records selected for monitoring and discuss record keeping methods with staff who maintain them. Copies of certain documents and records may be made for purposes of preparing the monitoring report.

Records to be reviewed by the monitoring staff include:

1. Financial Management (2 CFR 200.300 through 2 CFR 200.309):
 - a) Records pertaining to authorizations, obligations, unobligated balances, assets, expenditures, income, and interest supported by source documentation;



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- b) Records documenting control over, and accountability for, all funds, property, and other assets;
 - c) Comparison of expenditures with budget amounts;
 - d) Procedures for determining the allowability of costs in accordance with Subpart E – Cost Principles;
 - e) Procedures for requesting Federal funds from CPRA;
 - f) Documentation of internal controls; and
 - g) Any additional item (vouchers, invoices, financial reports, audits, payroll reports, time and attendance records, etc.) needed to verify and support transactions.
2. Procurement (2 CFR 200.318 through 2 CFR 200.326):
- a) Rationale for method of procurement and selection of contract type;
 - b) Documents related to Micro-Purchases, Small Purchases, Request for Proposals, Request for Qualifications, Sealed Bidding and Noncompetitive Proposals including advertisements, quotes, responses, bids, evaluations, scoring and tabulations.
 - c) Affirmative steps to assure minority businesses, women’s business enterprises, and labor surplus area firms are used when possible;
 - d) Contractor selection or rejection;
 - e) Contractor eligibility (www.sam.gov) ;
 - f) Basis for the contract price including independent cost estimate (ICE);
 - g) Bonding requirements, if applicable;
 - h) Verification cost plus a percentage of cost and percentage of construction cost methods of contracting were not used; and
 - i) Contract or agreement with contract provisions as described in Appendix II to Part 200-Contract Provisions.
3. Property and Equipment (2 CFR 200.310 through 2 CFR 200.316):
- a) Description of property or equipment including serial number or other identification number, if applicable;
 - b) Acquisition date and cost, including percentage of Federal funds;
 - c) Location, use and condition of the property;
 - d) For acquisition of real property, documentation of compliance with the “voluntary” acquisition procedures of the Uniform Act (49 CFR 24.101(b)(1) through 49 CFR 24.101(b)(5));



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- e) For projects involving the relocation of any displaced person as defined at 49 CFR 24.2(a)(9), documentation of compliance with the relocation assistance procedures of the Uniform Act (49 CFR Part 24) including required notices, planning and advisory services, and claims for relocation assistance payments.
4. Labor Compliance (DBRA):
- a) Wage rate decision;
 - b) Federal labor provisions incorporated in applicable contracts;
 - c) Payroll reporting forms;
 - d) Documentation related to payroll deductions, fringe benefits, apprenticeship, additional classifications, etc.;
 - e) Employee interviews; and
 - f) Wage compliance reports and restitution, if applicable.
5. Environmental Review (NEPA):
- a) Documentation related to required environmental compliance activities; and
 - b) Environmental permits or approvals required for the project.
6. Non-Discrimination:
- a) Documentation related to civil rights compliance;
 - b) Documentation related handicap and disability compliance;
 - c) Documentation related to equal employment opportunity compliance; and
 - d) Other documentation related to non-discrimination.
7. Record Keeping (2 CFR 200.333):
- a) Documentation that required records are being stored electronically or in hardcopy format.
 - b) Procedures regarding backup of electronic records and/or safekeeping of hardcopy records.
8. Performance Management:
- a) Review the overall subrecipient performance to determine compliance with subrecipient agreement; and
 - b) Documentation related to subrecipient performance and progress including time schedules, performance measures and deliverables.
9. Audit (2 CFR 200 Subpart F) and Monitoring:
- a) Audit reports;
-



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- b) Documentation related to audit findings; and
- c) Documentation related to prior monitoring reports and findings.

C. Exit Conference

The CPRA monitor will meet with designated subrecipient officials to discuss results of monitoring. The subrecipient may invite staff or consultants to attend the exit conference.

1. Discuss findings, if any, and methods of correcting each individual deficiency;
2. Discuss concerns, if any, and methods of correcting concerns;
3. Discuss any observations made regarding the subrecipient and offer technical assistance where applicable; and
4. Answer any questions subrecipient officials, staff or consultants may have.

VIII. Monitoring Reports and Appeals

Within thirty (30) days after the completion of the monitoring visit or desk review, a written report of the results of the monitoring visit/review will be forwarded to the subrecipient.

A. Monitoring Report

The monitoring report contains:

1. A detailed list of areas reviewed;
2. A detailed list of findings, if any;
3. A recommendation accompanying each finding explaining how the deficiency can be corrected;
4. A detailed list of concerns, if any;
5. A recommendation may be included on how to eliminate the concern;
6. Observations, if any, made regarding the subrecipient's operation; and
7. If findings are severe, the letter accompanying the report may place a hold on further reimbursements to the subrecipient until the findings are cleared.

B. Subrecipient Response to Monitoring Report

Within thirty (30) days after receipt of the monitoring report, the subrecipient must submit a written response to the monitoring report. The response should be addressed to the CPRA Monitoring Director. The response should include:

1. A response to each individual finding and concern, if applicable.
2. Copies of any documentation to back up the response to the findings.



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C. Response to Subrecipient Response

Upon receipt of the subrecipient's response to the monitoring report, CPRA monitoring staff will review the response to determine if the findings have been satisfied. A written response to the subrecipient's response will be sent to the subrecipient and will include the following:

1. Those findings which have been satisfied will be noted as closed. If all findings are closed the monitoring review is considered to be complete.
2. Findings which are not satisfied will remain open, and will require further response or action on the subrecipient's part.
3. The subrecipient will be given an adequate period of time to take any further action needed to correct the findings and respond in writing.
4. If these actions are satisfactory, the findings are noted as closed and the monitoring is considered to be complete.
5. If these actions are not satisfactory, further correspondence is required until such time as all findings are closed and the monitoring is concluded.
6. The close of the contract does not necessarily close the monitoring. Correspondence will continue until all findings are closed.

D. Appeals

In the event that a subrecipient and CPRA monitoring staff cannot come to an agreement on one or more findings of CPRA's monitoring visit, an appeal may be made in writing to the chairman of the CPRA Board. The appeal should state clearly the finding being appealed, and the basis for the appeal.