## **Title III-E – National Family Caregiver Support Program #93.052**

NC Division of Aging and Adult Services – Review of Compliance Supplement Criteria Requirements

Region \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ AAA or Service Provider\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Reviewer’s Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| **COMPLIANCE SUPPLEMENT CRITERIA REQUIREMENTS** | **DETERMINE COMPLIANCE IN THE FOLLOWING AREAS** | **(✓) COMPLIANCE SUPPLEMENT CRITERIA** |
| 1. **Activities Allowed or Unallowed**:*Specific activities identified in the grant agreement, state and federal regulations.*
 | * Performance Review Tool for FCSP, Part I, Question #1 and corresponding questions.
 | Yes ❒ | No ❒ | N/A ❒ |
| 1. **Allowable Cost/Cost Principles**:*Ensure that costs paid are reasonable and necessary for operation and administration of the program.*
 | * Performance Review Tool for FCSP, Part II, Questions 1 & 2.
 | Yes ❒ | No ❒ | N/A ❒ |
| 1. **Cash Management**:*Only* a*pplicable when advances in excess of 60 days are provided to a DAAS subrecipient.*
 | N/A |  |  |  |
| 1. **Reserved**
 | N/A |  |  |  |
| 1. **Eligibility**: *Assure that only eligible individuals receive services and assistance under this program.*
 | * Performance Review Tool for FCSP, Part I, Question #4.
 | Yes ❒ | No ❒ | N/A ❒ |
| 1. **Equipment and Real Property Management**:  *Equipment defined as tangible property with a useful life more than one year and a cost of $5,000 or more may only be purchased if specifically approved in the contract or grant agreement.*
 | N/A |  |  |  |
| 1. **Matching, Level of Effort, Earmarking**: *Matching: Specific percentage required which must be provided to receive funding. Level of Effort and Earmarking are not required.*
 | * Earmarking: Performance Review Tool for FCSP, Part I, Question #6.
 | Yes ❒ | No ❒ | N/A ❒ |
| **h. Period of Availability of Federal Funds**: *The time period authorized for federal and state funds to be expended (July – June).* | * Verify authorized signature and date on NGA or contract stating period of availability. If applicable, determine if DAAS has approved carry forward funding.
 | Yes ❒ | No ❒ | N/A ❒ |
| **COMPLIANCE SUPPLEMENT CRITERIA REQUIREMENTS** | **DETERMINE COMPLIANCE IN THE FOLLOWING AREAS** | **(✓) COMPLIANCE SUPPLEMENT CRITERIA** |
| **i. Procurement, and Suspension and Debarment**:*Assure that subrecipients have and follow policies and procedures for procurement and that subrecipients have not been suspended or debarred by the federal government from receiving funding.* | * Verify that contract for services has an authorized signature and date and that it references 45 CFR 92.36(b)(11), which states that the subrecipient has procedures for settling all contractual and administrative issues arising out of procurement of services.
 | Yes ❒ | No ❒ | N/A ❒ |
| **j. Program Income**: *Assure that program income is used to expand services.* | * Performance Review Tool for FCSP, Part I, Question #8f.
 | Yes ❒ | No ❒ | N/A ❒ |
| 1. **Reserved**
 | N/A |  |  |  |
| 1. **Reporting**: *Assurance that funds are being managed efficiently and effectively to accomplish the program objectives. Reporting requirements are contained in the laws, regulations, and contract or grant agreement.*
 | * Performance Review Tool for FCSP, Part I, #9
 | Yes ❒ | No ❒ | N/A ❒ |
| 1. **Subrecipient Monitoring**:

*Requirements for subrecipient monitoring of grant awards passed through AAAs to counties via the DAAS-735 funding agreement oblige AAAs to oversee the activities of each county’s community service providers. There is a subrecipient relationship between the AAA and the county, including the county’s designated service providers, and all are bound by the terms and conditions for the provision of aging services specified in the funding agreement. The county is not allowed to assign any portion of its interest in the agreement (paragraph 5).*  | * DAAS monitors: Determine if AAA monitored the community service providers listed on the county funding plan per minimum requirements.
* AAA monitors: “Criteria m” for subrecipient monitoring is “N/A” when monitoring community service providers, because there are no subrecipient relationships below the service provider level for this funding source. Corrective action for non-compliance of subcontractors, including paybacks of grant funds for disallowed costs, is the responsibility of the community service provider (subrecipient).
 | Yes ❒ | No ❒ | N/A ❒ |
| **n. Special Tests and Provisions**: *See annual compliance supplement for special tests and provisions.* | * Performance Review Tool for FCSP, Part II, 2d,e
 | Yes ❒ | No ❒ | N/A ❒ |
| 1. **Conflict of Interest**: *For non-profit subrecipients only, a notarized copy of the subrecipient’s policy addressing conflicts of interest must be seen.*
 | * Subrecipient has an original notarized copy of their conflict of interest policy on file.
 | Yes ❒ | No ❒ | N/A ❒ |