

J. Aleksevish Pastor Chief Project Officer <u>alek@opspr.com</u> <u>info@opspr.com</u>



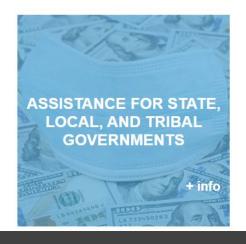


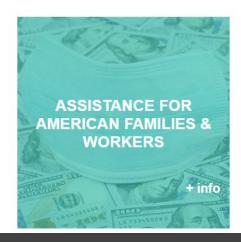
The PR ARPA Monitoring Challenge





American Rescue Plan Act of 2021









Puerto Rico Programs

- Puerto Rico received a \$2.47 billion allocation.
- A program was developed, including specific guidelines for approved categories.





Total ARPA Funds for Puerto Rico

• **\$2.4** Billion

Funds available for the NGO Programs

• \$30 Million

Round 1

• \$12,423,035 for 64 NGOs

Round 2

• \$12,761,505 – approvals in process for 72 recommended projects.

Possible Closed Round

• \$4,815,460.00

Allocation for Puerto Rico NGO proponents

Pre-Aw ard

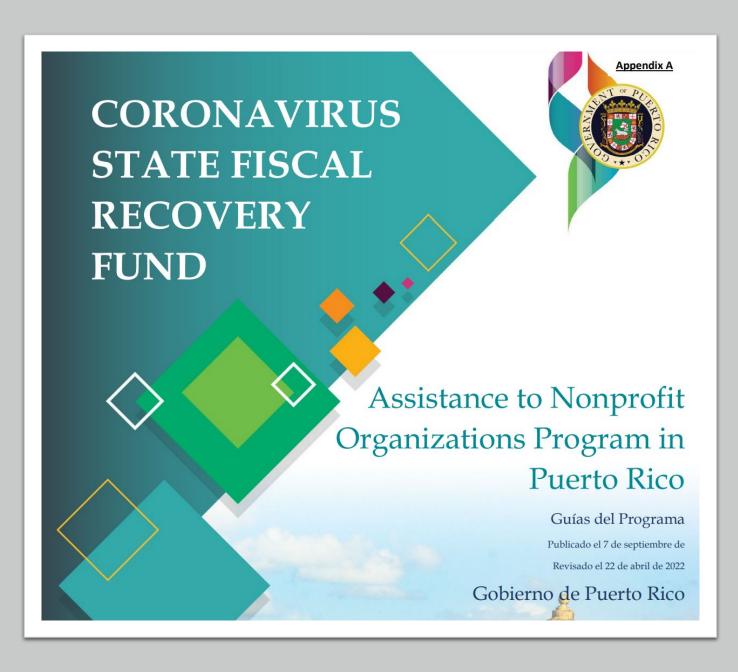
Assistance to Nonprofit
Organizations Program in
Puerto Rico

Guías del Programa

Publicado el 7 de septiembre de

Revisado el 22 de abril de 2022

Gobierno de Puerto Rico



Program Guidelines

- Guidelines were developed for the first round.
- Revised guidelines published for a second round.
- Categories* for proposals:
 - Support public health and economic impact
 - Loss of income,
 - Invest in aqueduct and sewerage structures and broadband

*priority was to be given to projects impacting the elderly.

Eligibility Criteria

Be a Puerto Rico non-profit entity.

Have incurred or planned the necessary expenses and/or services related to the COVID-19 emergency.

Agrees to comply with the terms and conditions of the Program.

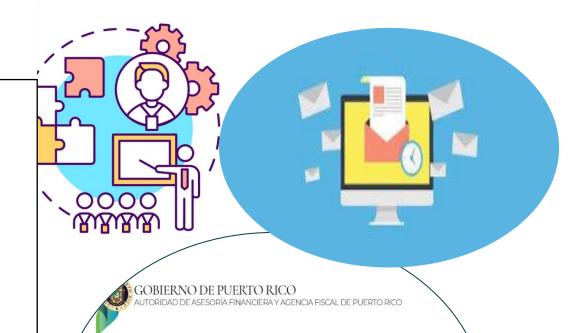
Agrees to return the funds if necessary.

Accepts that while receiving other funds for COVID-19-related assistance does not preclude receiving CSFRF funds, expenses are only eligible if they are:

- Expenses that have not been covered or reimbursed and;
- Expenses that will not be covered in the future by other federal or private programs

Continuous Guidance for NGOs

- •Two orientation sessions concerning the guidelines and compliance.
- •Electronic register for email communication.
- Dedicated email for inquiries about the RFP.
- •FAQ document was developed and updated as emails were received.



Preguntas Reportes de Gastos e Informes Trimestrales

1. ¿A partir de qué fecha se comienzan a radicar los informes? De ser antes del calendario de trabajo establecido, ¿qué debemos poner en los informes?

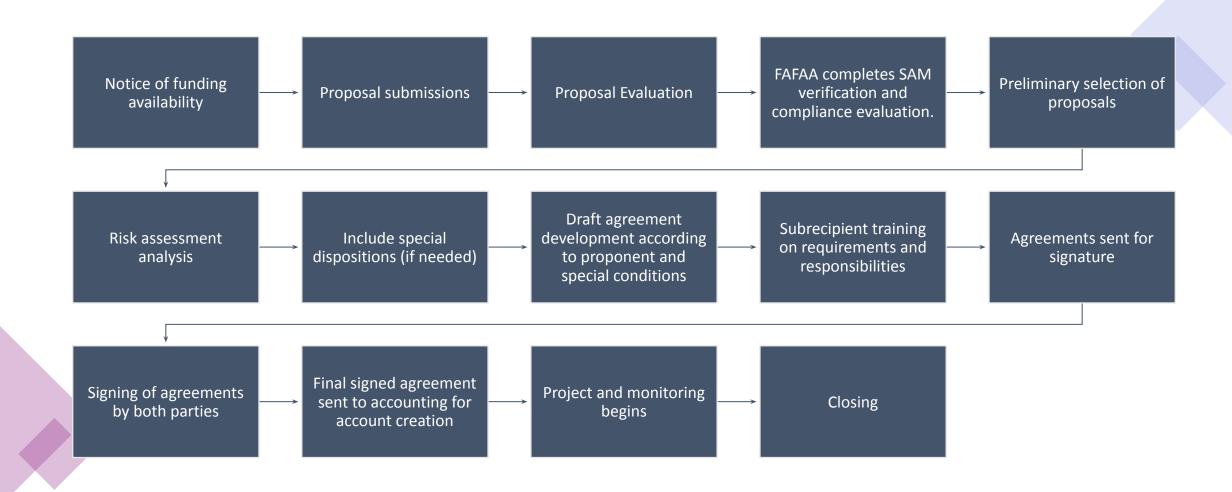
Respuesta: Desde el 12 de agosto del 2022, de no incurrir gastos someterá el reporte sin gastos.

2. Entidad presenta problemas al ingresar el campo de State Cod

Respuesta: En el campo "State Code" debe ingresar un códir caracteres de su estado. Ejemplo- Puerto Rico (PR)

que se estableció en el presu

Program progression



Each project unique in its own context



Submitted

Selected

178

67





157

72*

*Pre-selected pending final decision



Prior to Risk assessment

• Eliminate non-eligible proposals

• Screen remaining for pre-selection

• Risk assessment of recommended proposals

• Evaluation committee selection and training



Proposal Risk Assessment Tool

CFDA Number:					
SFDA Nulliber:			2	1.027	
Program Name:			Coronavirus State and L	ocal Fiscal Recovery Funds	
Risk Assessment Completed by:				828	
Risk Assessment Completed date:					
Proposal Amount:					
Fotal Score:			20.2	0	
Risk Assessment:			Lov	Risk	
. Proposal Amount		Small <\$100,000	Medium \$100,000 to \$300,000	Large \$300,000 to \$500,000	Exceeds Award Ceil >\$500,000
Amount of the proposal.		=======================================			32 13
) B CIit-		Not Complex	Slightly Complex	Moderately Complex	Highly Complex
2. Program Complexity Rating		Not Complex	Slightly Complex	Moderately Complex	riignij Complex
 Entity risk: Is the entity receiving an award for the first time? Does the entity have adequate and qualified staff to comply wi 	ith the terms of	Y	'es	No)
	1	Y	es	No.)
 Does the entity have adequate and qualified staff to comply wi he agreement? 	ith the terms of				
Does the entity have prior experience with similar programs?	1		· ·		
f. Does the entity maintain policies which include procedures for compliance with the terms of the award?	r assuring				
 Does the entity have an accounting system that will allow then and accurately track the receipt and disbursements of funds rela- award? 					
Did the entity's key staff members attend trainings provided by					
p. Did the entity have one or more audit findings in their last singlegarding program non-compliance?	ie audit report				
n. Other issues that may indicate high risk of non-compliance? E Examples: Luvacve in personnel 2, extensi risks includings economic political conditions, regulatory changes, and unculable information 3, ne products, or services 4, organizational restructuring) «Spes for each issu	conditions, w activities,				
Additional notes or considerations specific to the p	proposal:				
Additional notes or considerations specific to the p	proposal:				

Risk Assessment

• Risk assessment considered the relevance, importance, incidence, and manageability of risk related to grant recipients' performance and financial operations.



Due to the nature of the recipients, where prior experience with similar grants is non-existent, most non-profit organizations are classified in the medium to high-risk category. Thus, the **reporting tool provides an effective way to observe them closely**, with ample opportunities for **timely technical assistance**.

Stages



Initial risk assessment conducted for submitted proposals for pre-selection.



Detailed risk assessment after the final selection of proposals is submitted by the evaluation committee.



Continuous evaluations through the life of the award with reporting tool.

Continuity and Risk Level Factors

Award amount

Prior experience managing same or similar awards

Substantial changes to personnel or the budget in a fiscal year

Timely submission of financial and program performance reports

Results of reporting findings

Time-impact of projected oversight

Sub-award Agreement

Special Conditions

Waves Ahead Corp, shall permit AAFAF to carry out monitoring and evaluation activities, including any performance measurement system required by the applicable law, regulation, funding sources guidelines or by the terms and conditions included in this Agreement.

- The Sub-recipient agrees to ensure, to the greatest extent possible, the cooperation of its agents, employees and board members in such monitoring and evaluation efforts.
- · The Sub-recipient will submit the following:



F	REPORT NAME SUBMISSION DATE		DELIVERED TO	ATTACHMENT		
l-	Monthly Expenditure Report	 Monthly: day 5th of the following month 	cfrrngo@aafaf.pr.gov	1-	Expenditur Report	
ii-	SF 425	o Quarterly:	crfngo@aafaf.pr.gov	H=	SF-425	
A. docu	Supporting ments for SF 425: 1. comparison of budget vs actual, 1. supporting documents for	day 15th after the closing of the quarter for each FY				



- Challenge to temper the sub-award for Puerto Rico NGOs.
- Safeguarding compliance with the grantor's requirements, including all the clauses required by 2 CFR 200.

Success lies behind an effective Pre-Award Process



- Strong guidelines
- Risk Assessment
- Eligibility Criteria
- Training sessions
- Continuous feedback

Selected NGO Training and Assistance

Grant Management: Life cycle, allowable costs, 2 CFR 200.

Meeting before the signing of agreements.

Reporting tool training.

Q&A session before the first reporting period deadline.

Dedicated email line for NGOs.

SharePoint unique site for each NGO.

Continuous 1:1 Technical Assistance Sessions.

The Reporting Tool

- The reporting tool provides for a **focused examination** of the relevant documentation and financials surrounding the program.
- Allows visibility of the use of funds to the program administrator.
- Keeps everything in a **single document** to facilitate the process of data collection, internal controls, and monitoring.
- Adheres to uniform standards (2 CFR 200).
- It is a one-stop shop for everything the subrecipient needs to provide.
- It is user-friendly and self-explanatory.



General Overview

Monthly- Day 5 of the following month.

- Report monthly expenses.
- Submit supporting documentation.
- Submitted monthly.

Expenditure Report NGO

SF425

• Summary of allocation, expenses, and available balance.
Budget vs. Actual report.
Submitted quarterly (every three months).

• Refund Request.
It must reconcile with the expenses incurred and reported in the official AAFAF expense report, which is submitted monthly
It is sent quarterly (every three months).

SF 270

Quarterly- day 5 of the following month.

Reporting tool: Letting **Data Tell** the story



General
Information(No input needed)
4 tabs

7 tabo

Calendar

20 Tabs

Instructions SF425 ----> SF270 ----> Expense Report (It requires input)

10 tabs

Tabs 1-8 (Will feed the monthly report)

SF-425 SF-270 (Quarterly reports) Summaries (No input needed)

Black tabs (Cumulative)

Expense Report Tool Calendar



SAMPLE EXPENSE REPORT TABS

4. Personnel
Expense Details

nstrucciones:	Proporcionar la in	sición, total							
	salario del periodo	, esideizo relacionado an	orido (%) y benencios	marginales (70).					
Trimestre	Mes	Nombre del Empleado	Posición	Total Salario del Periodo	Esfuerzo Relacionado al Fondo (%)	Total Salario Relacionado al Fondo	Beneficios Marginales (%)	Beneficios Marginales (\$)	Total Gasto de Periodo
	Junio 2022	Juan del Pueblo	Especialista	\$ 1,200.00	50%	\$ 600.00	25%		\$ 750.00
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	Junio 2022								
	Junio 2022			· · · · · · · · · · · · · · · · · · ·					
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	Junio 2022			A					
	Junio 2022								
	Junio 2022								
	Junio 2022								
	Total Junio 2022			\$ 1,200.00		\$ 600.00		\$ 150.00	\$ 750.00

This sample tab requires the entity to enter the details about employees who received any payment with program funds. Each line provided a space for the name, position, total salary for the period, program-related effort percentage, and % fringe benefits. Totals are calculated by pre-set formulas.

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		OR REIMBU	RSEMENT		1 TYPE OF		MENT	V		
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	Number and Street:				Number and Street:					
	City, State	San Juan	PR		City, State					
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	e. Total (Sum of lines c & d)								23,350.00	
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	c. Amount requested (Line a minus line b)									
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3. Recipient Organization (Name and complete address including Zip code) ABC Corp Calle Rose Esquine Flor #25				(Foll	ow form in	CIAL REPO istructions)					
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perez⊚ abccorp.com b. Signature of Authorized Certifying Official e. Date Report Submitted (Month, Day, Year) 14. Agency use only: Standard Form 425- Revised 10/1/9/2011 OMB Approval Number: 0348-0061 Expiration Date: 2/28/2015 Paperwork Burden Statement According to the Paperwork Reduction Ad, as amended, no persons are required to respond to a collection of information unless it displays a valid Control number for this information collection is 0348-0061 Public reporting burden for this collection of information is early maked to everage 15 hour reviewing in that priors, scenaring early and set of average 15 hour reviewing in that priors, scenaring early and set of average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in that priors, scenaring early and set to average 15 hour reviewing in the residence of the prior of the scenarios.											
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SF270

The Reporting Tool included two tabs for the SF-425 and SF-270 forms. Monthly, as entities complete the eight expense report tabs, these forms are populated and modified. The entity only fills out cream-colored cells.

Black Tabs at the end of the Tool

The last six (6) tabs at the end of the tool are **for validation purposes ONLY**. Entities do NOT need to enter any data. The values are populated automatically. Entities can use these values as part of their internal validation.

Instrucciones:	En esta pestaña NO se proporcionará ninguna información. La información será provista automáticamente.										
Trimestre	Mes	S	alario		Beneficios		Gasto del				
	Junio 2022	\$	600.00	\$	150.00	\$	750.00				
Q1	Julio 2022		-		2		140				
	Agosto 2022		-		<u>u</u>		福音				
	Total Trimestre Q1		600.00		150.00		750.00				
	Total Desembolsado	\$	600.00	\$	150.00	\$	750.00				
	Total según Presupues						100,000.00				
	Balance Disponible / ((Défic	cit)			\$	99,250.00				

Supporting Documentation

- Each expense must include supporting documentation.
- Scan the required documents.
- Use naming convention: NameEntity_ExpenseXXX_Identifier*
- Upload it to SharePoint along with the report.
 - 4. Personnel
- Pay Stubs
- Proof of Payment
- Time & Effort Forms

- 5. Equipment
- Invoice
- Proof of Payment

- 6. Materials
- Invoice
- Proof of Payment

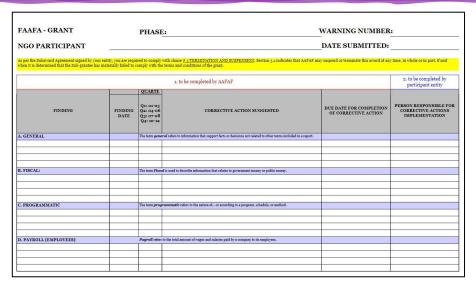
- 7. Professional Services
- Signed Contract Copy
- Proof of Payment

- 8. Other
- Invoice
- Proof of Payment

*Do not include special characters when saving the document. Do not leave spaces; divide with uppercase and lowercase letters or use a "_". Example EstanciaDuarte_ExpensesPersonal_MariaRojas

Backend: Scaffolding for Success

- Each analyst is assigned a maximum of ten (10) entities.
- Internal Validation processes.
- Validation tables and checklists.
- Email Templates.
- Timely reporting of findings to entities and on-the-spot technical assistance.





idos.

Confiando en que se encuentre bien al recibir este comunicado. En respuesta a su más reciente comunicación y con el propósito de aclarar sus dudas, luego de evaluar el reporte, solicitamos que corrija los siguientes datos:

 Documento identificado como: "Parvoll Register Marta Jaraiz Septiembre" indica que se le pagaron 50 horas, sin embargo, la documentación de apoyo indica que le dedicó 19 horas al proyecto. Entendemos que falta información en el siguiente documento de apoyo:



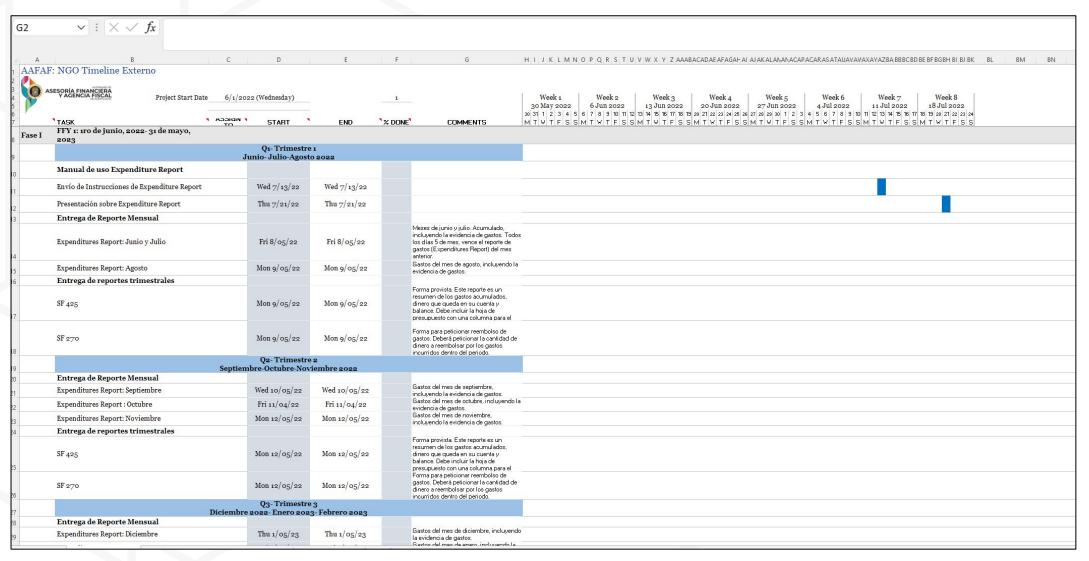
 Los documentos enviados electrónicamente deben descargarse en la plataforma según el expediente que correspondan.

En cuanto a sus dudas relacionadas a los servicios profesionales y el presupuesto aprobado:

- El tope debe ser por año para que luego analicen si se renueva el contrato o no.
- Deben corregir el contrato de acuerdo con el presupuesto aprobado.

En adición, queremos recordarles que en el comunicado que le enviamos el 20 de octubre de 2022 hay señalamientos adicionales que se deben corregir del primer trimestre (Q1 junio a agosto) y segundo trimestre (O2 mes de sentiembre).

Internal and External Timelines



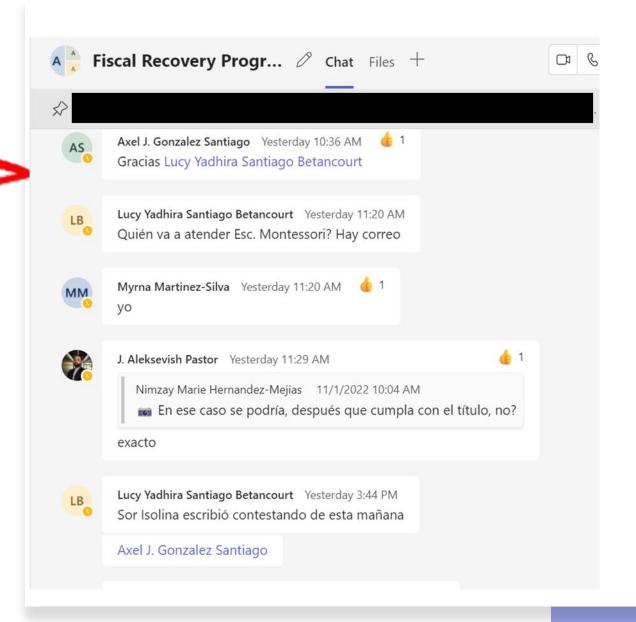
Backend Challenges



- Tight timelines (timing is key.)
- Difficult to process as one batch (Entities will submit reports at different times).
- Incomplete documentation.
- Technological Issues.

Backend Mitigation

- Teams channel is the official method for team communication.
- Dedicated staff member filters emails.
- Internal tools for validation processes.
- Email with findings including suggested corrective actions.



On-Site Visits



- •Site visits are expected to start in Feb 2023.
- •Ranking list for logistics of visits based on compliance:
 - Challenges with documentation.
 - No expenses to date.
 - Expending faster than planned.

Inadequate resources and a solid administrative structure.

Lack of understanding of the importance of documentation.

Biggest Challenges Non-existent internal procedures for purchases and staffing.

Perception that internal control systems are not needed.

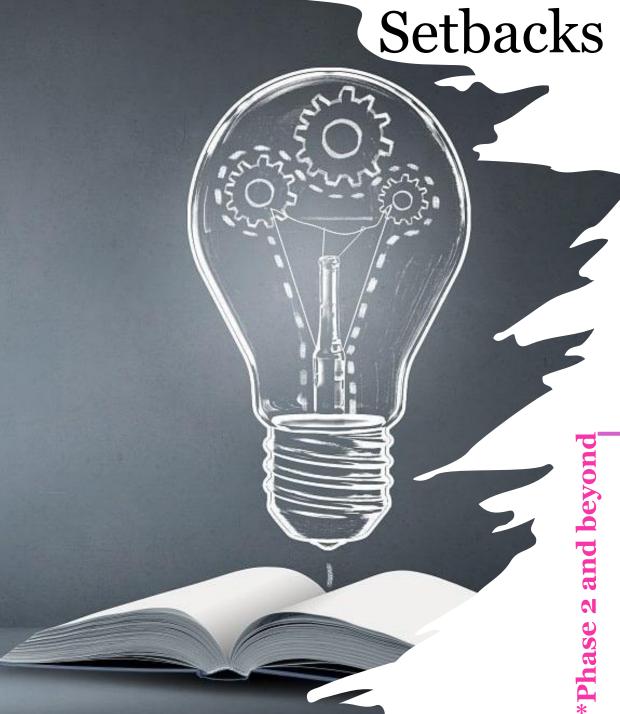
Lacking technology skills.

Staffing is composed of volunteers and professional services.

Turning Challenges into Opportunities



- The program is constantly being strengthened.
- Timing forced us to build the plane as we flew it.
- Great opportunity for capacity building.
- Technical assistance geared towards strengthening the compliance component to warrant good past performance that will allow the entities to be more equipped to request other funding.



Setbacks and Lessons Learned*:

• Several requests for no-cost extensions

• Shortage of workers – Puerto Rico, like elsewhere, is struggling to find and keep workers amid record-high job openings.

• Supply chain impacts slow down the implementation.

• Hurricane Fiona and continuous rain and flooding.

• Although entities presented a well-thought project, implementation has not been possible as planned.

• Created a pool of resources to support the capacity and structure building of the NGOs.

• Referrals for training and other professional services.

• Updated Sub-award agreements.

• Updated Reporting Tool.

• Validation that ALL projects need to be completed by December 2024.

• We foresee a surplus of unexpended funds.

• Evaluating the option to allocate this surplus to Phase 1 entities with good performance to further their impact.

Continious training to safeguard compliance.

Establishing an efficient pre-award process.

Rules and guidelines are clear and specific.

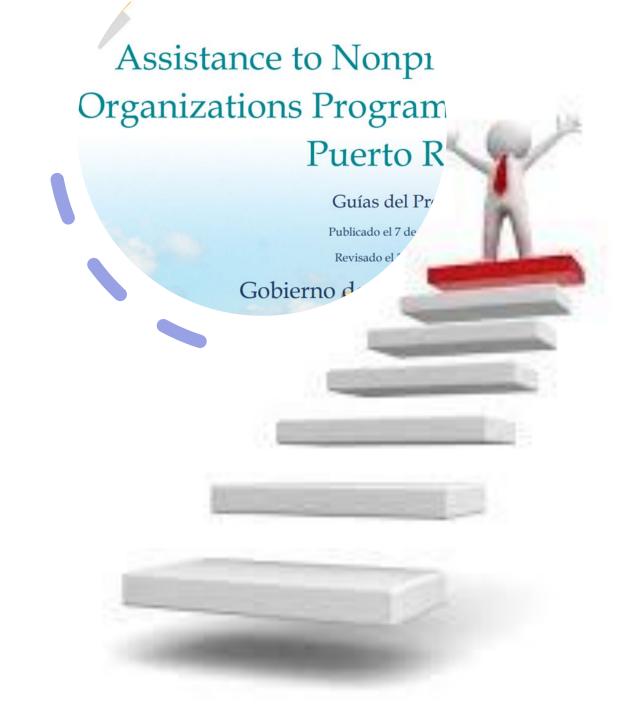
Training potential proponents for the Notice of Funding Opportunity.

Establishing a FAQ document similar to those established by federal granting agencies and the Treasury Department.

Translating to Spanish all relevant documentation, including the FAQ document from the Treasury Department.

Funds were not allocated as a lump sum; an advanced payment was issued to cover their first quarter and allow them to have cash flow.

Due to Hurricane Fiona making landfall in Puerto Rico, the agency decided to provide an extra advance to cover quarter two.









info@opspr.com (787) 766-6100