



BOOST End of Year Cross-Functional Monitoring

2022-2023



The Georgia Department of Education (GaDOE) is required by federal law to monitor the implementation of federal programs at the subgrantee level. The GaDOE fulfills this requirement through cross-functional monitoring of subgrantees on a cyclical and risk basis.

Monitoring will be conducted by a cross-functional monitoring team of GaDOE and GSAN personnel from the following federal programs:

1. Elementary & Secondary School Emergency Relief (ESSER)- American Rescue Plan (ARP) Act

a. Approved as BOOST- Building Opportunities in Out-of-School Time Grant

The monitoring teams (GaDOE & GSAN) will adhere to program-specific requirements outlined in this monitoring document.

GSAN: The GSAN staff will further communicate the monitoring method for its indicator.

GADOE: Monitoring will be conducted **virtually by GaDOE staff**. Subgrantees will upload indicators 2 and 3 documentation to the provided folders by the GaDOE staff members via email. (If the subgrantee will use another document-sharing platform, please send a notification email to ARP_ESSER@doe.k12.ga.us. Include procedures for access.)

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REQUIREMENTS	EVIDENCE OF IMPLEMENTATION
OVERARCHING REQUIREMENTS FOR FEDERAL PROGRAMS	
1. SUBGRANTEE MONITORING OF PROGRAMS- Monitored By GSAN	
<p>The subgrantee monitors its programs for implementation and effectiveness of funded strategies/activities at the subgrantee, location, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements authorized under the American Rescue Plan (ARP).</p> <p>2 CFR Sec. 200.301, 200.328, 200.330, 200.26(c); 34 CFR Sec. 300;</p>	<ol style="list-style-type: none"> 1. Monitoring Programs <ol style="list-style-type: none"> A. Site Visits <ul style="list-style-type: none"> • GSAN monitors all subgrantee programs through direct site visits, using a Site Visit Checklist, which allows monitors to review program activities, staffing, learning acceleration efforts, enrichment efforts, and fidelity to the approved project application. • GSAN plans to conduct site-level visits to 50% of grantees in Year 2 and 50% in Year 3. Pilot site visits were conducted in Year 1. B. Direct Oversight of Subgrantee Budgets <ul style="list-style-type: none"> • GSAN oversees and pre-approves subgrantee budgets to ensure that they align with the approved project application, comply with federal regulations, and support the grant program's goals. 2. Monitoring Implementation <ol style="list-style-type: none"> A. Project Modification Form <ul style="list-style-type: none"> • Subgrantees must use GSAN's Project Modification Form to submit any significant, proposed changes to their approved project plan. This includes changes to the program model, outcomes, student populations served, transportation options, partnerships, staffing, etc. These forms are carefully reviewed by GSAN staff to ensure that modifications remain consistent with program requirements and expectations and that the subgrantee's efforts remain allowable under all applicable guidelines. B. Annual Subgrantee Report <ul style="list-style-type: none"> • Subgrantees must submit to GSAN an annual program report that reflects their implementation data to date, including program outputs, service numbers, outcomes, and narrative accountings of successes and challenges. • GSAN uses the annual report to analyze the BOOST Grants Program's overall implementation and each organization's success; this informs future funding recommendations. C. Ongoing Technical Assistance <ul style="list-style-type: none"> • Through ongoing technical assistance, GSAN can monitor implementation challenges and address them directly with the subgrantee. Significant technical assistance challenges, or any concerns arising from the provision of TA, are documented in the subgrantee file. 3. Monitoring Effectiveness <ol style="list-style-type: none"> A. BOOST Town Halls <ul style="list-style-type: none"> • Bi-monthly subgrantee town hall meetings are conducted to allow GSAN to listen to grantees' concerns, challenges, and other questions. • This time also provides additional assistance, peer learning, and training that targets known effectiveness challenges. B. BOOST Advisory Council <ul style="list-style-type: none"> • The Council comprises 25 subgrantees who not only provide stakeholder voice to GSAN's decision-making but also give us feedback on subgrantee effectiveness and opportunities for improvement. C. Third-Party Evaluation <ul style="list-style-type: none"> • GSAN has contracted with Metis Associates to conduct a formal evaluation of the BOOST Grants Program. Their research and assessments will provide objective information on the overall effectiveness of GSAN and the subgrantees.

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2. INTERNAL CONTROLS, EXPENDITURES, INVENTORY, DRAWDOWNS, COST PRINCIPLES – Monitored By GaDOE

Evidence that all subgrantee's Internal Controls specific to subgrantee's expenditures are required to be in writing by 2 CFR Part 200 (Allowability, Segregation of Duties, Procurement, Technical Evaluations of Competitive Proposals, Conflict of Interest, Time and Effort, Stipends, Travel) are present and meet requirements for internal controls:

- Effectiveness and efficiency of operations
- Reliability of reporting for internal and external use
- Compliance with applicable laws and regulations
- Ability to meet the following objectives for Federal Awards:

o Transactions are correctly recorded and accounted for, to 1) Permit the preparation of reliable financial statements and Federal reports; 2) Maintain accountability over assets

o Transactions are executed in compliance with 1) Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a Federal program; and 2) Any other Federal statutes and regulations that are identified in the Compliance Supplement

Evidence that all subgrantee inventory internal controls required to be in writing by 2 CFR Part 200 are present and meet the requirement for internal controls:

- Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
- Maintenance procedures to keep the property in good condition. 2 C.F.R. Sec. 200.62(c); 2 C.F.R. Sec. 200.313 Evidence that the subgrantee manages equipment in a way that meets the following conditions

1. Evidence shall include:

A. Internal controls required to be in writing by 2 CFR Part 200:

1. Written Allowability Procedures - 2 CFR Sec. 200.302(b)(7); 2 CFR Sec 200.403
2. Segregation of Duties - GAO-14-704G Standards for Internal Controls for the Federal Government 10.03;10.12-10.14; 2 CFR Sec. 200.303(a)
3. Written Procurement Procedures - Specific levels described in §200.317through §200.327); 2CFR Sec 200.318(a)
4. Written Method for Conducting Technical Evaluations of CompetitiveProposals and Selecting Recipients - 2 CFR Sec. 200.320(d)(3)
5. Written Conflict of Interest Policy - 2 CFR Sec. 200.318(c)(1)
6. Written Personal Compensation Policies (Time and Effort to include salaries,substitutes, and stipends)- 2 CFR Sec. 200.430(a)(1); SBOE 160-3-3-.04
7. Written Travel Policy - 200.474; 200.475; OCGA §50-5B-5; OCGA §20-2-167(b); SBOE 160-5-2-.23; Financial Management for GA LUAs Chapter 40

B. Evidence may include other recommended procedures not required in writing

1. Procedures to support suspension and debarment are checked before makingpurchases above the \$25,000 threshold from a single vendor (34CFR 85.110 and 2 CFR 180.220)

C. Copy of **Year 1 Payroll & Expenditure Detail Reports for all BOOST funded activities** organized by site, function, and object (include subgrantee Chart of Accounts crosswalk, when applicable)

D. For each grant, a copy of Source Documentation for all requested expenditures (purchase orders, invoices, contracts/ contract deliverables, agendas, receipts, travel authorizations, pre-approval, federally funded instructors/ tutors, including part-time, full-time, and additional compensation, and administrative costs), all capital expenditures, all competitive procurement

E. Copy of Year 1 Time and Effort Records (time logs, periodic certifications, fixed schedules, etc.)

F. Copy of special approval documentation (capital expenses, field trip forms, other approvals as necessary).

G. Review of single audit reports for applicable subgrantees

H. Copy of time-stamped documentation verifying vendors against suspension and debarment database

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<ul style="list-style-type: none"> • Use of the equipment for authorized purposes of the property during the period of performance or until the property is no longer needed for the purposes of the project. • Maintenance of property records to include the person responsible for maintaining documentation. Purchase Orders and Inventory Records showing item description, cost, the funding source for equipment, including the Federal Award Identification Number (FAIN), date of purchase, serial number or another identification number, location, use, condition of the property, and disposition data including date of disposal. • Physical inventories and reconciliation of physical <p>Evidence that the subgrantee maintains accounting records supported by source documentation and costs are allowable under applicable laws and regulations. Expenditures meet the following standards including, but not limited to:</p> <ul style="list-style-type: none"> • Segregation of duties in review and authorization (must include Program Coordinator). • Reconciles all applicable reports – expenditure, budget, etc. • Allowable under applicable laws and regulations. • Prove necessary, reasonable, and allocable. • Supported by source documentation. • Supplement, not supplant. • Align with the approved Federal budget. • Occur within the grant Period of Performance and benefits current grant period. • Comply with standards of documentation of personnel expenditures (Time and Effort). 	<p>2. Evidence shall include:</p> <ul style="list-style-type: none"> A. Written procedures for managing equipment - (including replacement equipment) until disposition takes place <ol style="list-style-type: none"> 1. Acquisition of equipment 2. Method of entering information into the subgrantee's inventory management system 3. Off-site use of equipment 4. Physical inventory 5. District Equipment Disposition Procedures 6. Adequate safeguards related to loss, damage, or theft of equipment 7. Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition. 8. Maintenance procedures to keep the property in good condition. B. Copies of all purchase orders documenting purchases of equipment with federal funds. C. Copy of inventory records with all required components in CFR 200.313(d) D. Records/logs of dates (at least once every two years) that physical inventories were conducted at subgrantee and schools with the date, and signatures of the person conducting inventory <p>3. Evidence shall include:</p> <ul style="list-style-type: none"> A. Written cash management (payment) procedures B. Evidence that subgrantee reconciles drawdown requests as needed and maintains supporting documentation
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3. ELEMENTARY AND SECONDARY SCHOOL EMERGENCY (ESSER), AMERICAN RESCUE PLAN, CONSTRUCTION, MODIFICATIONS, AND OR REMODELING- Monitored By GaDOE

Evidence that:

- The subgrantee submitted required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontracts over \$2,000 for construction, alterations, repairs, painting, and decorating.
- The subgrantee provided a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. [2 CFR 200.322](#)

This applies to Subgrantees that utilized Elementary and Secondary School Emergency Relief funding for minor or major construction costs.

Evidence shall include:

- Written procedures in the subgrantee's Federal Programs Manual describing school facility repairs and improvements to enable the operation of schools to reduce the risk of virus transmission and exposure to environmental health hazards and to support student health needs and inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and nonmechanical heating, ventilation, and air conditioning systems, filtering, purification, and other air cleaning, fans, control systems, and window and door repair and replacement. CRRSA Act SEC. 313 (d) and ARP Act SEC. 2001 (e).
- Source documents for all expenditures, such as copies of purchase orders, invoices, contracts, inventory reports, T/E reports, travel expense reports, stipends, contracts/MOU for services as applicable.
- Supporting evidence that demonstrates the subgrantees required written contract; advertising; competitive sealed bidding; timing of addendums; prequalification.
- Supporting evidence demonstrating the subgrantee's written construction contracts using laborers and mechanics financed by federal education funds over \$2,000 includes language that all contractors and subcontractors must pay wages that are not less than those established for the locality of the project (prevailing wage rates). Forms: (1) If applicable, a Standard Form (SF)308 to obtain an applicable wage determination for a construction project not covered by a published wage determination. (2) Form WH-347 has been made available for the convenience of contractors and subcontractors required by their Federal or Federally aided construction-type contracts and subcontracts to submit weekly payrolls. Correctly filled out, this form will satisfy the requirements of Regulations, Parts 3 and 5 (29 C.F.R., Subtitle A) as to payrolls submitted in connection with contracts subject to the Davis-Bacon and related Acts.
- Supporting evidence from the subgrantee, architectures, and or contractors that the grantee holds the full title to the site, including rights of access, that is sufficient to ensure the grantee's undisturbed use and possess of the facilities for 50 years or the useful life of the facilities, whichever is longer; ensure sufficient funds are available to meet any non-Federal share of the cost of constructing the facility; the construction began/completed within a reasonable time after the grant for the construction is made; compliance with all safety and health standards; handicapped accessibility; and avoidance of flood hazards.



Building Opportunities in Out-of-School Time (BOOST) Grants Program Cross-Functional Monitoring Assignments

Year 1	Year 2	Year 3
21 st Century Leaders	Augusta Richmond County	Africa's Children's Fund
Agape Youth & Family Center	Carrie Steele Pitts Home	Afterschool All-Stars
Artportunity Knocks	Center of Pan Asian Community Services	Association of Village Pride, Inc
Atlanta Music Project	Corners Outreach	Breakthrough Atlanta, Inc
Boy Scouts of America, Inc Atlanta Area	Fugee Family Inc	Catholic Charities Atlanta
Boy Scouts of America, Inc Northeast Area	Harvest Rain Early Learning	Center of the Visually Impaired
Bread of Life Development Ministries	Hope for Youth Inc.	City of Victory
C5 Georgia Youth Foundations	Girls on the Run South Georgia	Code Calloway
Camp Twin Lakes	Helping Empower Youth Inc	College AIM
City of Refuge	Horizon Atlanta	Create Your Dreams
Clarkston Community Center	Inspiring Services	Extra Special People
Crisp County Council Inc	International Rescue Committee	Family Connection of Columbia County, Inc
Deep Center Incorporate	Gents & Glam	Family Connection of Turner County, Inc
East Atlanta Kids Club	Communities in Schools of Georgia Inc.	Family Support Circle
Educational Advisory Foundation	Jessye Norman School of the Arts	FullCircle Program
Elachee Nature Science Center	Georgia Tech Research Corp	Future Seekers
Georgia Recreation and Park Association	Girls Incorporated of Greater Atlanta	HealthMPowers Inc
LaAmistad	Kids College Wesleyan College	Kennesaw State University Research and Service Foundation, Inc.
Lift Youth Center	Lincoln County Community Partnership	NEW CHURCH DEVELOPMENT COMMISSION INC
Los Ninos Primero	McIntosh Trail Community Service Board	NOBIS WORKS INC
Mercy Housing South East	Men About Change	North Broad Youth Center, Inc
Metamorphosis Powerhouse Company	Next Generation Focus	ODYSSEY ATLANTA



Building Opportunities in Out-of-School Time (BOOST) Grants Program Cross-Functional Monitoring Assignments

Mothers Raising Sons	Reach for Excellence	Ohoopie Regional Library System Jeff Davis Library dba Vidalia Toombs County Library
New American Pathways	Restoration Atlanta Mission	Onesource Learning & Development Center
New Neighbors Network	Safe Harbor Children's Shelter	Rainbow Village
Paint Love Inc.	Savannah County Day School	RAISING EXPECTATIONS INC
Positive Growth Inc.	Spectrum Autism Support Group	Rockdale County Board of Commissioners
Rainbow Village	Star House Foundation	South GA Stars Academy Inc
Soccer in the Streets	Swem International Inc.	SOUTHSIDE RECREATION CENTER INC
STEM Atlanta Women	Teach O Rea Preparatory	The Elaine Clark Center for Exceptional Children
Team Up Mentoring, Inc.	The Drake House	THE STUDY HALL INC
Think Big Youth Organization	Thomasville Community Resource Center	Urban League of Greater Atlanta
Time2Give	Together Friends Organization	VASHTI CENTER INC
YELLS, Inc.	Vox Teen Communications	YMCA of Metro Atlanta
	Wilkes County Community Partnership	Young Women's Christian Organization of Athens, Georgia, Inc.

BOOST Grant Program Cross-Functional Monitoring Training

Office of External Affairs
August 4, 2022 & August 10, 2022



Resources



<https://www.georgiainsights.com/cares-act.html>

ESSER Funding

In response to the economic outcome of the COVID-19 pandemic in the United States, Congress passed three bills that provided immediate and direct economic assistance to state and local educational agencies through the Elementary and Secondary School Emergency Relief funds. These funds were provided to support areas with the greatest need, where the academic and non-academic components for school districts had the greatest impact due to COVID-19. As additional funding was provided, the intent of the funds was to support States and local school districts' efforts to safely reopen schools, address significant gaps in learning, and support measures of implementation that will continue to reduce the effects of COVID-19 on students and families.

Coronavirus Aid, Relief & Economic Security (CARES) Act	Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act	American Rescue Plan (ARP) Act
ESSER I	ESSER II	ESSER III
GA: \$457,169,852	GA: \$1,892,092,618	GA: \$4,252,431,691

SAVE THE DATE!

BOOST Grants

- [Georgia Statewide Afterschool Network](#)
- [BOOST Grant Award List](#)

Helpful Tools

- 
- [Expenditure Pre-Approval Form](#)
 - [Educational Field Trip Approval Form](#)
 - [Sample Periodic Certification Form](#)
 - [BOOST Construction Assurance Form](#)
 - [BOOST Training PPT](#)

Completed forms may be emailed to ARP_ESSER@doe.k12.ga.us

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Alignment With Georgia's System of Continuous Improvement



BOOST Plan

Budgeting

Implementation

Monitoring

Examine Progress

What's Next?

1 Approved BOOST Budget

Audit Trail

District Name: 21st Century Leaders, Inc. District Code: 11547
 Fiscal Year: 2022 Program: ESSER III- ARP- BOOST GRANT - Original
 Status: Approved (Date: 06/16/2022 13:15:44) Superintendent Sign off date: 06/16/2022 10:25:18




Program Information | Budget | Comments | **Audit Trail** | Assurances | Programs

Data Collection Audit Trail | **Budget Audit Trail**

Audit Trail	Old Status	New Status	Changed By	Changed Date
Program Manager Signed Off		Approved	Areezo Ojany	6/16/2022 1:15:44 PM
Message : Successfully Signed off				
Program Manager Signed Off	Program Manager Signed Off		Krystal Horford	6/16/2022 11:53:59 AM
Message : Successfully Signed off				

- Budget has been submitted in the Con App and approved by the program specialist
- Grants Accounting has approved the budget.

2 Submitted Invoice

Grant Details												
Status: Approved		State Project Number: 100		LEA Fund Code: 448								
Fiscal Year: 2022		System: Agape Community Center, Inc - 11521		LEA Program Code: 9999								
Grant ESSER III- ARP- BOOST GRANT - 810		Approved Budget: \$107,100.00		Funds Received: \$80,325.00								
Grant Period: July - 2021 to June - 2022		Available Budget: \$26,775.00		Bond Series: <input type="text"/>								
Request of Fund for Period: January - 2022												
Local ID: <input type="text"/>												
Invoice List												
Total Amount Requested \$10,710.00												
School ID	Invoice No.	Vendor Name	Date Item Received	Invoice Total	Other Sources	Amount Reimbursed	Amount Approved	Function Code	Object Code	Fiscal Year	Attach.	Comm.
Agape Community Center, Inc - 11521	100	Agape Community Center Inc	01/01/2022	\$1,080.00	\$0.00	\$1,080.00	\$1,080.00	2700 - STUDENT TRANSPORTATION SERVICE	180 - BUS DRIVERS	2022		
Agape Community Center, Inc - 11521	100	Agape Community Center Inc	01/01/2022	\$3,000.00	\$0.00	\$3,000.00	\$3,000.00	2210 - IMPROVEMENT OF INSTRUCTIONAL SERVICES	190 - OTHER MANAGEMENT PERSONNEL	2022		
Agape Community Center, Inc - 11521	100	Agape Community Center, Inc - 11521	01/01/2022	\$2,630.00	\$0.00	\$2,630.00	\$2,630.00	2400 - SCHOOL ADMINISTRATION	162 - PLANNING &	2022		

- Subgrantee entered all expenses for reimbursement in the invoice application
- Appropriate documentation to support the expense are uploaded for each line item
- (ex. expenditure reports, receipts, etc.)

3 Approved Invoice/Expenditure Report

GRAINGER INVOICE

ESSER III- ARP- BOOST GRANT

NO AMOUNT DUE

Corners Outreach			ESSER III- BOOST Grants Community Grants budget			2021-2022 ARTSCHOOL			AUG 21-Feb 22			22-Mar		
Title			Function-Object			Total			Drawdown (3/27) Remaining Balance			Actual Expenditure		
Personnel/Professional Teachers			1000-140	\$	43,891.00	\$	27,188.75	\$	16,692.25			9962.5	\$	7,329.75
Physical supplies (paper, cleaning, operating)			1000-610	\$	4,150.00	\$	1,156.53	\$	2,993.47			566.16	\$	2,427.31
Field Trip Admission Fees			1000-810	\$	858.00	\$	-	\$	858.00			-	\$	858.00
Parent Workshops			2100-177	\$	1,081.00	\$	-	\$	1,081.00			-	\$	1,081.00
Curriculum design, ELI specialist			2210-162	\$	35,559.00	\$	15,289.50	\$	20,269.50			3097.5	\$	17,172.00
Staff certification and professional development			2210-810	\$	1,802.00	\$	-	\$	1,802.00			495	\$	1,307.00
Indirect expenses (afterschool programming)			2300-880	\$	6,734.00	\$	-	\$	6,734.00			5914.1	\$	819.90
On-site Program Directors (management for quality and safety)			2400-190	\$	100,000.00	\$	93,445.00	\$	6,555.00			6555	\$	-
Rental Space (Instructional)			2600-441	\$	14,000.00	\$	14,000.00	\$	-			-	\$	-
Driver pay for afterschool programming			2700-180	\$	2,000.00	\$	2,000.00	\$	-			-	\$	-
Vehicle Maintenance for afterschool fleet			2700-430	\$	1,000.00	\$	-	\$	299.02			700.98	\$	700.98
Gas for transporting students afterschool			2700-620	\$	2,000.00	\$	-	\$	2,000.00			414.36	\$	1,585.64
Total Allocation					\$ 213,079.00		\$ 153,388.80		\$ 59,690.20			\$ 26,404.62		\$ 33,285.58
							Percentage Remaining: 72%					28%		
							Percentage Drawdown: 28%					12%		

By signing this report, I certify that the best of my knowledge and belief the reported net is true, complete, and accurate, and the expenditures, disbursements, and cash disbursements are for the purposes and objectives set forth in the terms and conditions of the Federal award.

KC Sorensen

Date: 4/22/2022

- Each expense in which reimbursement is being requested, is accompanied by appropriate forms of documentation

4 Cross Functional Monitoring

My files > Active BOOST Files > BOOST Monitoring Documents				
Name	Modified	Modified By	File size	Sharing
Kennesaw State University Research and Service Foundation, Inc	Inds ago	Courtney Reid	3 items	Shared
BOOST Monitoring Documents > Kennesaw State University Research and Service Foundation, Inc				
Name	Modified	Modified By	File size	Sharing
Indicator 2	July 5	Courtney Reid	0 items	Shared
Indicator 3	July 5	Courtney Reid	0 items	Shared

GaDOE's Federal Programs monitoring process consists of five major components:

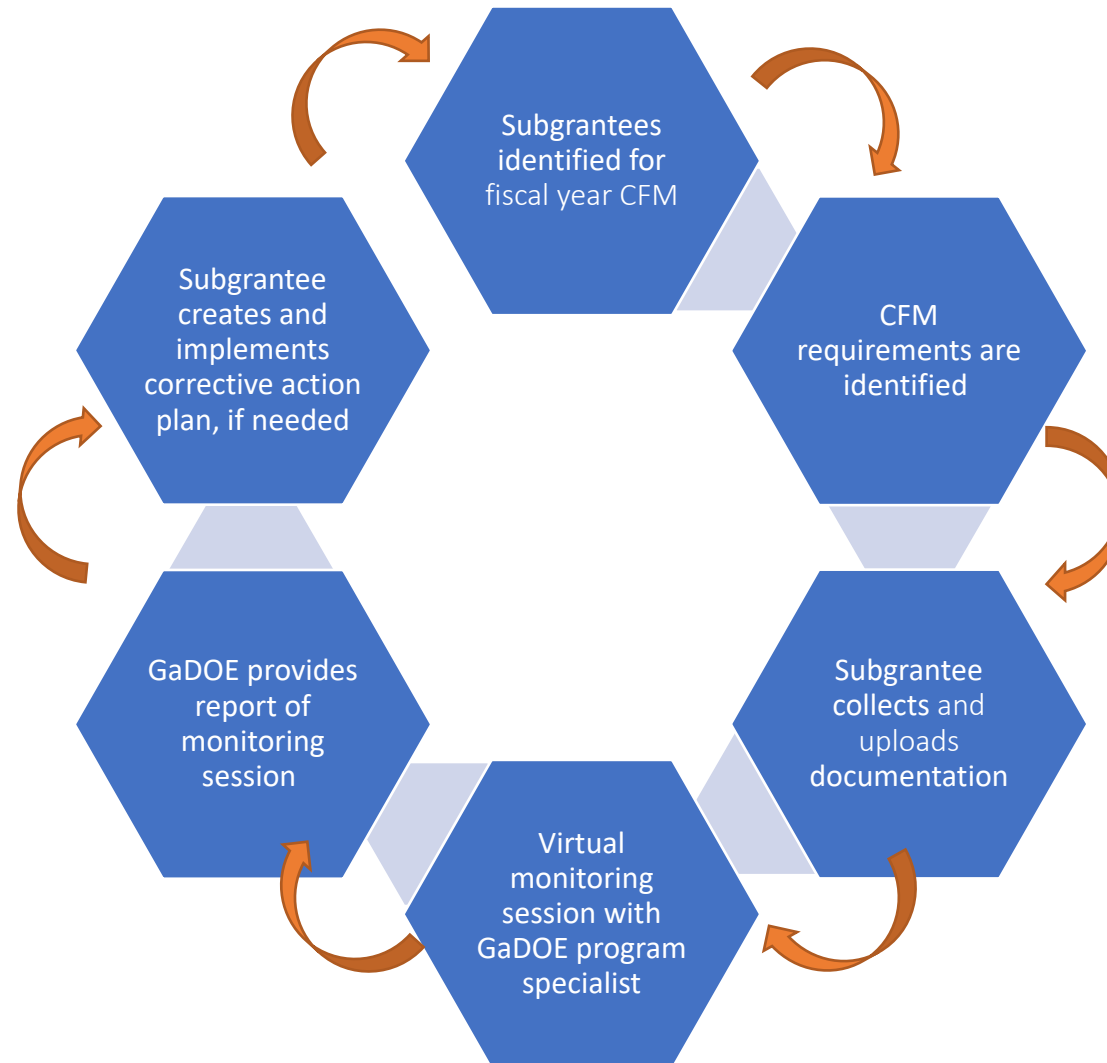
- Program Requirements
- Monitoring of Expenditures
- Single Audit
- Physical Inventory Monitoring
- Desktop Monitoring of Approved LEA Budgets (CFM)



Cross-Functional Monitoring (CFM) Process



Cross-Functional Monitoring Cycle



Virtual Monitoring Session



Notification emails – include link to the folder



Share Documents with GaDOE



Specialist may call for explanation



Final report

Initial Emails

Notification Email

- ☐ Notification of the assigned monitoring process that will be completed for the subgrantee (Track A or B).
- ☐ Highlighted sample selection of approved invoices.
- ☐ Important date reminders
- ☐ Links to upload information

Important Dates

	YEAR 1	YEAR 2	YEAR 3
Sample Expenditure Request Email Sent Out from GaDOE Specialist	August 19, 2022	August 18, 2023 *subject to change	August 16, 2024 *subject to change
Deadline to Submit Documents	September 7, 2022	September 6, 2023 *subject to change	September 9, 2024 *subject to change
Final Deadline to Submit Requested CFM Documents	September 9, 2022	September 8, 2023 *subject to change	September 11, 2024 *subject to change
GaDOE Reports Emailed to Subgrantees	September 23, 2022	September 22, 2023	September 27, 2024

Monitoring Expenditures

Track A

- The subgrantee has submitted an invoice with uploaded receipts
- Evidence of examples include Payroll reports, paid invoices, proof of payment

GRAINGER
11111 FRONTAGE ROAD
ROSELAND, GA 30087-1210
www.grainger.com

INVOICE
GRAINGER ACCOUNT NUMBER: 88758818
INVOICE NUMBER: 070781987
INVOICE DATE: 12/21/2022
NO AMOUNT DUE

SHIP TO:
FULTON LEADERSHIP ACADEMY
2311 DUNWOODY
DUNWOODY, GA 30344-6837

BILL TO:
FULTON LEADERSHIP ACADEMY
2311 DUNWOODY
DUNWOODY, GA 30344-6837

LINE #	ITEM #	DESCRIPTION	QUANTITY	UNIT PRICE	TOTAL
1	40438	PAINT 5000000000000000 WHITE, 120000, MANUFACTURED BY DYNALOGIC	8	15.00	120.00

INVOICE SUB TOTAL: 120.00
TAX: 2.74
TOTAL: 122.74

NO PAYMENT DUE - THIS INVOICE FOR YOUR RECORDS

Track B

- The subgrantee has submitted an invoice with a detailed expenditure report
- Additional supporting documents were not previously uploaded

Corners Outreach				AUG 31-Feb 22		22-Mar	
ESSEB IN-BUDGET grants Community Grants budget				Previous Expenditure		Actual Expenditure	
2021-2022 AFTERSCHOOL				Drawdown (3/27) Remaining Balance		Drawdown Remaining Balance	
Title	Function-Object	Total					
Paraprofessional Teachers	1000-140	\$ 43,891.00	\$	27,198.75	\$ 16,692.25	9362.5	\$ 7,329.75
Physical supplies (paper, cleaning, operating)	1000-610	\$ 4,150.00	\$	1,156.53	\$ 2,993.47	566.16	\$ 2,427.31
Field Trip Admission Fees	1000-610	\$ 858.00	\$	-	\$ 858.00		\$ 858.00
Parent Workshops	2100-177	\$ 1,081.00	\$	-	\$ 1,081.00		\$ 1,081.00
Curriculum design, ELL specialist	2210-162	\$ 35,559.00	\$	15,289.50	\$ 20,269.50	3097.5	\$ 17,172.00
Staff certification and professional development	2213-610	\$ 1,802.00	\$	-	\$ 1,802.00	495	\$ 1,307.00
Indirect expenses (afterschool programming)	2300-880	\$ 6,734.00	\$	-	\$ 6,734.00	5914.1	\$ 819.90
On-site Program Directors (management for quality and safety)	2400-190	\$ 100,000.00	\$	93,445.00	\$ 6,555.00	6555	\$ -
Rental Space (Instructional)	2600-441	\$ 14,000.00	\$	14,000.00	\$ -		\$ -
Driver pay for afterschool programming	2700-180	\$ 2,000.00	\$	2,000.00	\$ -		\$ -
Vehicle Maintenance for afterschool fleet	2700-430	\$ 1,000.00	\$	299.02	\$ 700.98		\$ 700.98
Gas for transporting students afterschool	2700-620	\$ 2,000.00	\$	-	\$ 2,000.00	414.36	\$ 1,585.64
Total Allocation		\$ 213,075.00	\$	153,388.80	\$ 59,686.20	\$ 26,404.62	\$ 33,281.58
Percentage Remaining 25%				Percentage Drawdown 72%		18%	
						12%	

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements, and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award.

KC Sorensen Date: 4/22/2022

Monitoring Expenditures

Track A

- The subgrantee has submitted an invoice with uploaded receipts
- Evidence of examples include Payroll reports, paid invoices, proof of payment

- **Time and Effort Records (time logs, periodic certifications, fixed schedules, etc.)**
 - Please upload time and effort records aligning with the BOOST's payroll for the **requested personal compensation expenditures**. As part of the requested expenditures, these must include all periodic certifications for salary, afterschool, summer school, retention/incentive pay, vaccination pay, etc.
- **Suspension and Debarment**
 - Please include a copy of time-stamped documentation verifying vendors that exceed \$25,000 in expenditures against suspension and debarment for the expenditures highlighted as a part of the selected sample.
- **Inventory records with all required components in CFR 200.313(d)**
 - Please upload ESSER inventory records and inventory monitoring for the expenditures highlighted as a part of the selected sample.
- **Minor/Major construction complying with the Davis Bacon Prevailing Wage**
 - Weekly payroll demonstrates that all prevailing Davis Bacon Wage requirements have been met.


Monitoring Expenditures





Track B


- The subgrantee has submitted an invoice with a detailed expenditure report
- Additional supporting documents were not previously uploaded







- **A copy of Source Documentation for all requested expenditures** (purchase orders, invoices, contracts/ contract deliverables, agendas, receipts, travel authorizations, pre-approval, federally funded instructors/ tutors, including part-time, full-time, and additional compensation, and administrative costs), all capital expenditures, all competitive procurement
- **Time and Effort Records (time logs, periodic certifications, fixed schedules, etc.)**
 - Please upload time and effort records aligning with the BOOST's payroll for **the requested personal compensation expenditures**. As part of the requested expenditures, these must include all periodic certifications for salary, afterschool, summer school, retention/incentive pay, vaccination pay, etc.
- **Suspension and Debarment**
 - Please include a copy of time-stamped documentation verifying vendors that exceed \$25,000 in expenditures against suspension and debarment for the expenditures highlighted as a part of the selected sample.
- **Inventory records with all required components in CFR 200.313(d)**
 - Please upload ESSER inventory records and inventory monitoring for the expenditures highlighted as a part of the selected sample.
- **Minor/Major construction complying with the Davis Bacon Prevailing Wage**
 - Weekly payroll demonstrates that all prevailing Davis Bacon Wage requirements have been met.


Sharing Documents with GaDOE







My files > Active BOOST Files > BOOST Monitoring Documents 

 Name ▾	Modified ▾	Modified By ▾	File size ▾	Sharing
 Kennesaw State University Research and Se... 	onds ago	Courtney Reid	3 items	 Shared

> BOOST Monitoring Documents > Kennesaw State University Research and Service Foundation, Inc 

 Name ▾	Modified ▾	Modified By ▾	File size ▾	Sharing
 Indicator 2 	July 5	Courtney Reid	0 items	 Shared
 Indicator 3	July 5	Courtney Reid	0 items	 Shared

Kennesaw State University Research and Service Foundation, Inc > Indicator 2 

 Name ▾	Modified ▾	Modified By ▾	File size ▾
  Indicator 2.1.A 	About a minute ago	Courtney Reid	0 items
  Indicator 2.1.B	About a minute ago	Courtney Reid	0 items

1. Click on your organization folder under the BOOST Monitoring documents tab.

2. Select the corresponding indicator tab.

3. Upload documents for each indicator in the subfolder.

Possible Documentation Necessary for Monitoring



List of documents:

1. Purchase orders
2. Invoices
3. Contracts/Contract deliverables
4. Agendas
5. Receipts
6. Travel authorizations
7. Pre-approval
8. Federally funded instructors/tutors
9. Administrative costs
10. Other forms of documentation

Indicator 2

Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principles

Monitored By GaDOE



Internal Controls

Indicator 2.1.A

- **Code of Federal Regulations**

Recipients must operate their federal grants in accordance with the [Code of Federal Regulations](#).

- Recipients must establish and maintain effective fiscal control and fund accounting procedures (internal controls) over the Federal award that provide reasonable assurance that the recipient is compliantly managing the federal award. **Internal controls can be defined as a process, implemented by an recipients designed to provide reasonable assurance regarding the achievement of objectives in the following categories: effectiveness and efficiency in operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations (2 CFR §200.61).** The goal of internal controls is to reduce fraud, waste and abuse in the use of Federal funds. Recipients must adequately safeguard all assets and assure that they are used solely for authorized purposes.

A copy of Source Documentation for all requested expenditures

Indicator 2.1.D

- Possible documentation necessary for monitoring
 1. Purchase orders
 2. Invoices
 3. Contracts/Contract deliverables
 4. Agendas
 5. Receipts
 6. Travel authorizations
 7. Pre-approval
 8. Federally funded instructors/tutors
 9. Administrative costs
 10. Other forms of documentation

§ 200.430 Compensation - Personal Services

BOOST Grantee Training

- **(a) General.** Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the [period of performance](#) under the [Federal award](#), including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits which are addressed in [§ 200.431](#). Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees:
 - (1) Is reasonable for the services rendered and conforms to the established written [policy](#) of the [non-Federal entity](#) consistently applied to both Federal and non-Federal activities;
 - (2) Follows an appointment made in accordance with a [non-Federal entity](#)'s laws and/or rules or written policies and meets the requirements of Federal statute, where applicable; and
 - (3) Is determined and supported as provided in [paragraph \(i\)](#) of this section, when applicable.
- **(g) Nonprofit organizations.** For compensation to members of nonprofit organizations, trustees, directors, associates, officers, or the immediate families thereof, determination must be made that such compensation is reasonable for the actual personal services rendered rather than a distribution of earnings in excess of costs. This may include director's and executive committee member's fees, incentive awards, allowances for off-site pay, incentive pay, location allowances, hardship pay, and cost-of-living differentials.

Time & Effort




Written Personal Compensation Policies (Time and Effort to include salaries, substitutes, and stipends)- **2 CFR Sec. 200.430(a)(1)**; SBOE 160-3-3-.04



Time & Effort Indicator 2.1.E

- **Type 1: Periodic Certification**
 - Single Cost Objective
 - May be completed twice a year OR once a year as detailed in subgrantee’s written procedures
 - Supporting documentation is still required
 - Signed after the fact by employee or supervisor with knowledge of the work performed
 - May be completed by for an individual or group (both forms available on GaDOE Website)
- **Type 2: Personnel Activity Report (PAR) also known as time logs**
 - Multiple Cost Objectives
 - Can be submitted to the supervisor quarterly or monthly as detailed in subgrantee’s written procedures



Georgia Department of Education

Sample Periodic Certification – Multiple Employees
(Multiple employees working solely on one Federal cost objective)

Time period: _____ through _____.
(Date) (Date)


I certify that the employees listed below have performed work solely in accordance with the job responsibilities outlined in the attached job description(s) for the time period indicated above.

Name of Employee	Position

Supervisor (Print Name)	Supervisor (Print Position)
Supervisor Signature	Date Signed

Georgia Department of Education
August 17, 2018 • Page 136 of 138

Unless otherwise noted, all references to ESSA in this document refer to the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).



Georgia Department of Education

Appendix E: Time and Effort

Sample Periodic Certification – Single Employee
(One employee working solely on one Federal cost objective)

Time period: _____ through _____.
(Date) (Date)

This is to certify that _____ worked solely on _____ (name of single Federal Program) allowable activities in the job role of _____ during the time period indicated above.

OR

This is to certify that _____ performed work solely in accordance with the job responsibilities outlined in the attached job description for the time period indicated above.

Signature of employee

Printed name of supervisor

Date

Signature of supervisor

Date

Georgia Department of Education
August 17, 2018 • Page 135 of 138

Unless otherwise noted, all references to ESSA in this document refer to the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).

Flexibility for time and effort must be addressed in the subgrantee internal controls

Capital Expenditures Indicator 2.1.F

Per 2 CFR 200.439(b)(2), capital expenditures for special purpose equipment are allowable as direct costs, if items with a unit cost of \$5,000 or more have the prior written approval of the program manager of the federal program whose funds will be used for this purchase. The process for receiving prior approval is as follows:

- 1) Email the federal program's manager a request for approval which includes the following:
 - a) Equipment to be purchased including a description and intended use
 - b) Total unit cost of the equipment
 - c) Statement how this equipment is an identified need and is included in the subgrantee's pre-approved application/budget.
- 2) Once approved by the program manager, attach the approval to the **Attachment Tab** in the Consolidated Application

Expenditure Pre-Approval Form – ESSA, CARES Federal Programs

Purpose: Specific allowable uses of federal grants may require prior approval from the awarding agency. This form will be used by LEAs to request approval from GaDOE, when applicable. This form may also be used for other purposes where it is determined that pre-approval is needed.

Citations

CFR 200.439(b)(2): capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$5,000 or more have the prior written approval of the program manager of the federal program whose funds will be used for this purchase.

CFR 200.462: costs incurred for ordinary and normal management and alteration of facilities are allowable as indirect costs. Special arrangements and alterations costs incurred specifically for a federal award are allowable as a direct cost with the prior approval of the federal awarding agency or pass-through entity.

CFR 200.313: Equipment (i) Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the non-Federal entity must not encumber the property without prior approval of the federal awarding agency. The federal awarding agency may require the submission of the applicable common form for equipment. When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority: (i) Activities under a federal award from the federal awarding agency which funded the original program or project, then (ii) Activities under federal awards from other federal awarding agencies. This includes consolidated equipment for information technology systems.

CFR 200.462: Fees, penalties, damages, and other settlements. Costs resulting from non-Federal entity violations of, alleged violations of, or failure to comply with, federal, state, tribal, local, or foreign laws and regulations are unallowable, except when incurred as a result of compliance with specific provisions of the federal award, or with prior written approval of the federal awarding agency.

Directions

Complete this form and email it to the federal program manager/specialist to request approval. After approval is granted, attach this form to the general attachments tab in the consolidated application on the MyGaDOE portal.

General Information

LEA Name	
Contact Name	
Position	
Email Address	
Phone Number	
If Applicable Location of Asset	
Intended Length of Service	
Public or Private School	
Fiscal Information	
Fiscal Year	
Budget	
Funding Source	
If split funded/branded, list programs and percentage per program	
Function/Object Code	
If Applicable, Total Single Item Cost of Equipment excluding installation/shipping, additional costs (installation/shipping, etc.)	
Full description of item to be purchased, including intended use	
Intend and Purpose:	
Describe goals/objectives/intended outcomes	
Provide the evidence-based documentation to support the purchase (if required)	
Describe monitoring and/or measures of effectiveness to be used	

Equipment & Inventory

Indicator 2.2.A

- Evidence that all subgrantee inventory internal controls required to be in writing by 2 CFR Part 200 are present and meet requirement for internal controls:
 - Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
 - Maintenance procedures to keep the property in good condition. **2 C.F.R. Sec. 200.62(c); 2 C.F.R. Sec. 200.313**
 - Records/logs of dates (at least once every two years) that physical inventories were conducted at locations with date, and signatures of person conducting inventory

Equipment & Inventory

Indicator 2.2.A

- Maintenance of property records to include person responsible for maintaining documentation.
- Purchase Orders and Inventory Records showing:
 - Item description
 - Cost
 - Source of funding for equipment including the Federal Award Identification Number (FAIN)
 - (BOOST Grant FAIN: S425U210012)
 - Date of purchase
 - Serial number or other identification number,
 - Location
 - Use
 - Condition of property
 - Disposition data including date of disposal.

PO Number	Item Description	Serial Number or Serial Number	FAIN Number	Condition	Funding Source	Vendor	Cost	Acquisition Date	Use of Equipment	Disposition	Location
2033	HP Designjet T650 24" Printer	CN17V3M0DZ	S425D210013	NEW	ARP-ESSER III	Nisewonger Audio Visual Center	2800	1/5/2022	A		Central Office
2033	Ultimate 27" Roll Laminator	BGM21121075PRO	S425D210014	NEW	ARP-ESSER III	Nisewonger Audio Visual Center	2351	1/5/2022	A		Central Office

Cash Management 2.3

Develop and implement proper procurement procedures and cash management procedures that are well defined. Please note that, per 2 C.F.R. § 200.302(b)(6), every agency must have cash management procedures, even if they do not handle cash.

- (b)** The financial management system of each [non-Federal entity](#) must provide for the following (see also [§§ 200.334](#), 200.335, 200.336, and 200.337):
- (6)** Written procedures to implement the requirements of [§ 200.305](#).

Indicator 3

Elementary and Secondary School Emergency (ESSER), American Rescue Plan, Constructions, Modifications, and or Remodeling

Monitored By GaDOE



Construction-Helpful Tips to Keep In Mind

BOOST Grantee Training


Authorized Uses of Funds

- Servicing or upgrading HVAC systems consistent with applicable federal, state, and local standards and industry standards
- Repairing windows and/or doors so they can open to let fresh air in
- Installing or upgrading indoor air quality tools like filtering, purification, fan, and control systems
- Roof repair or replacement to improve indoor air quality (for example, to address leaks that lead to mold and diminished air quality)
- Mold, radon, and asbestos remediation
- Creating outdoor spaces for learning and other activities like eating lunch
- Replacing carpet with easier-to-clean flooring
- Renovations to facilitate physical distancing

Need to Know Information

- If a subgrantee uses funds for HVAC systems, the Department's regulation at 34 CFR § 75.616(c) requires the use of the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) standards.

GaDOE Construction Assurance Form


**Elementary and Secondary School Emergency Relief (ESSER)
Construction Cost Assurances Form**
BOOST Program

Subgrantee Name:	Click or tap here to enter text.
Facility Name:	Click or tap here to enter text.
Scope of Work	
Please identify the scope of work that will be completed. Allowable scope of work may include HVAC, Roofing, Flooring, Repair/Replace Window/Door, Additions/New Construction, and Other. If other is selected, please provide detail to ensure allowability.	
Scope #1	Click or tap here to enter text.
Scope #2	Click or tap here to enter text.
Scope #3	Click or tap here to enter text.

If necessary, the subgrantee may attach a separate document to annotate the full scope of work charged to the federal grant for submission to ARP_ESSER@doe.k12.ga.us

All ESSER grants that include:

- HVAC
- Roofing
- Flooring,
- Repair/Replace Window/Door,
- Additions/New Construction,
- Preparation of drawings and specifications for school facilities;
- Erecting, building, acquiring, altering, remodeling, repairing, or extending school facilities;
- Inspecting and supervising the construction of school facilities; and
- Debt service for such activities
- Other

Are required to submit an assurance form **per** facility with all scope of work annotated.

GaDOE Construction Assurance Form

<input type="checkbox"/>	The subgrantee assures that any construction activities, including renovations or remodeling, that are necessary for a subgrantee to prevent, prepare for, and respond to COVID-19 could be permissible, though the burden remains on the subgrantee to maintain the appropriate documentation that supports the expenditure.
<input type="checkbox"/>	<p>The subgrantee assures all requirements and submission of documentation for projects that meet the definition of construction are submitted to GaDOE.</p> <p>The Impact Aid program statute defines "construction" as "(A) the preparation of drawings and specifications for school facilities; (B) erecting, building, acquiring, altering, remodeling, repairing, or extending school facilities; (C) inspecting and supervising the construction of school facilities; and (D) debt service for such activities." ESEA section 7013(3), 20 U.S.C. § 7713(3).</p>
<input type="checkbox"/>	<p>The subgrantee assures the cost aligns with 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.</p> <ul style="list-style-type: none"> Allocable Cost Reasonable Cost Procurement <ul style="list-style-type: none"> (Specific levels described in §200.317 through §200.327)
<input type="checkbox"/>	<p>The subgrantee assures the construction/renovation project will be completed in a timely manner.</p> <p>Estimated start: Click or tap here to enter text. Estimated completion: Click or tap here to enter text.</p> <p>Period of <i>carryover</i> availability ends: ARP Act: September 30, 2024</p>
<input type="checkbox"/>	<p>The subgrantee assures that a written prior approval form is submitted to the SEA.</p> <p>2 CFR 200.439 Equipment and Other Capital Expenditures</p> <p>The subgrantee assures all requirements of reporting on Real Property 2 CFR 200.330 are followed.</p> <p>Equipment is inventoried according to 2 CFR 300.313</p>
<input type="checkbox"/>	<p>Davis -Bacon Wage Determination</p> <p>The subgrantee assures wage requirements of the Davis-Bacon Wage Determination are followed. The requirements apply to all federal contracts and subcontract over \$2,000 for construction; alterations, repairs, painting, and decorating. Must pay workers no less than the locally prevailing wage and fringe benefits for corresponding work in the areas. U. S. Department of Labor</p> <p>Reimbursement Request- (with Davis Bacon Wage payroll documentation)- WH347</p>
<input type="checkbox"/>	A Subgrantee that uses funds for HVAC systems will meet the requirements of 34 CFR § 75.616(c). The Department's regulation requires the use of American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) standards.

<input type="checkbox"/>	<p>The subgrantee assures the cost follow federal construction regulations. 34 CFR75.600-617.</p> <p>Please ensure the subgrantee has reviewed each hyperlinked required from the Code of Federal Regulations.</p> <p>75.600- Use of a grant for construction: Purpose of 75.601-75.615 75.601-Applicant's assessment of environmental impact (Not applicable, but recommended for review) 75.602- Preservation of historic sites must be described in the application. 75.603- Grantee's title to site. 75.604- Availability of cost sharing funds. 75.605- Beginning the construction. (Not applicable) 75.606- Completing the construction. 75.607- General consideration in designing facilities and carrying out construction. 75.609- Comply with Safety and Health Standards 75.610- Access by the handicapped. 75.611- Avoidance of flood hazards. 75.612- Supervision and inspection by the grantee. 75.613- Relocation assistance by the grantee 75.614- Grantee must have operational funds. 75.615- Operation and maintenance by the grantee. 75.616- Energy Conservation 75.617- Compliance with the Coastal Barrier Act</p>
<input type="checkbox"/>	<p>Domestic Preference for Procurements</p> <p>The subgrantee assures funds used under the ESSER II and ESSER III will follow the requirements of 2 CFR § 200.322, a new regulation that applies to Federal grants made after November 12, 2020. It establishes domestic preferences for procurements under Federal grants that are subject to the Uniform Guidance.</p> <p>2 CFR § 200.322 Domestic preferences for procurements.</p> <p>(a) 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). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award.</p> <p>(b) For purposes of this section:</p> <p>(1) "Produced in the United States" means, for iron and steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.</p> <p>(2) "Manufactured products" means items and construction materials composed in whole or in part of nonferrous metals such as aluminum; plastics and polymer-based products such as polyvinyl chloride pipe; aggregates such as concrete; glass, including optical fiber; and lumber.</p>

Superintendent's Print Name	Signature	Date
Click or tap here to enter text.		Click or tap here to enter text.

Prevailing Davis Bacon Payroll Documentation

- **Reimbursement Request- (with Davis Bacon Wage payroll documentation)- [WH-347](#)**

As noted above, an LEA using ESSER or GEER funds for remodeling, renovation, and new construction must comply with additional federal requirements. For example, these projects require prior written approval by an LEA's Governor or SEA (or the Department for State projects). (See Title VII of the ESEA and 2 CFR § 200.439(b).) Approved construction projects (i.e., remodeling, renovation, and new construction) also must comply with applicable Uniform Guidance requirements, Davis-Bacon prevailing wage requirements¹⁴, and all of the Department's applicable regulations regarding construction at 34 CFR §§ 76.600 and 75.600-75.618. Some of the relevant part 75 requirements that must be considered before a new construction project is initiated.

Receiving CFM Results



Receiving Cross-Functional Monitoring Results

Each subgrantee will receive an official results letter detailing the monitoring outcome. Subgrantees receiving a corrective action plan will receive further instructions on addressing the requested action.

Cross-Functional Monitoring Results	
Met	Subgrantee is following federal regulation
Met with Recommendations	Subgrantee is following federal regulations. However, simple recommendations are made to improve the effectiveness of the BOOST grant program
Did not Meet	Corrective action is required for the subgrantee to be in compliance with federal regulations
N/A	Only applicable for Indicator #3

Questions





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