U.S. DEPARTMENT OF EDUCATION
BUDGET INFORMATION NON-CONSTRUCTION PROGRAMS

OMB Control Number: 1894-0008
Expiration Date: 08/31/2020

Name of Institution/Organization

American Samoa Department of Education

Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form.

SECTION A - BUDGET SUMMARY U.S. DEPARTMENT OF EDUCATION FUNDS

Budget Categories	Project Year 1 (a)	Project Year 2 (b)	Project Year 3 (c)	Project Year 4 (d)	Project Year 5 (e)	Total (f)
1. Personnel	$0.00					
2. Fringe Benefits	$0.00					
3. Travel	$0.00					
4. Equipment	$13,036,546.00					
5. Supplies	$6,568,099.00					
6. Contractual	$2,673,879.00					
7. Construction	$0.00					
8. Other	$16,043,408.00					
9. Total Direct Costs (lines 1-8)	$38,321,932.00					
10. Indirect Costs ——— *Enter Rate Applied	N/A					
11. Training Stipends	Included in Other as Professional Development					
12. Total Costs (lines 9-11)	N/A					

***Indirect Cost Information *(To Be Completed by Your Business Office)*:**

If you are requesting reimbursement for indirect costs on line 10, please answer the following questions:

(1) Do you have an Indirect Cost Rate Agreement approved by the Federal government? √ Yes_____No.

(2) If yes, please provide the following information:
Period Covered by the Indirect Cost Rate Agreement: From: 10 / 01 /2019 To: 09 / 30 /2020 (mm/dd/yyyy)
Approving Federal agency:_____Other (please specify): U.S. Department of Interior, Interior Business Center. The Indirect Cost Rate is 19.63 %

(3) If this is your first Federal grant, and you do not have an approved indirect cost rate agreement, are not a State, Local government or Indian Tribe, and are not funded under a training rate program or a restricted rate program, do you want to use the de minimis rate of 10% of MTDC?_____Yes_____No. If yes, you must comply with the requirements of 2 CFR § 200.414(f).

(4) If you do not have an approved indirect cost rate agreement, do you want to use the temporary rate of 10% of budgeted salaries and wages?_____Yes √ No. If yes, you must submit a proposed indirect cost rate agreement within 90 days after the date your grant is awarded, as required by 34 CFR § 75.560.

(5) For Restricted Rate Programs (check one) -- Are you using a restricted indirect cost rate that:____Is included in your approved Indirect Cost Rate Agreement? Or____Complies with 34 CFR 76.564(c)(2)? The Restricted Indirect Cost Rate is_____%

(6) For Training Rate Programs (check one) -- Are you using a rate that:_____Is based on the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4))? Or ____Is included in your approved Indirect Cost Rate Agreement, because it is lower than the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4)).

ED 524

Note:

At the time of grant submittal and award, ASDOE had an IRCA of 19.63% (10/01/2019 - 09/30/2020) approved by the federal government. This ICRA has now expired and ASDOE is awaiting both provisional and final rates from the cognizant agent - the U.S. Department of Interior, Interior Business Center. ASDOE continues to utilize an indirect rate of 19.63% until it receives the provisional or final rates and will submit to the U.S. Department of Education immediately upon receipt.

Name of Institution/Organization	Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form.

SECTION B - BUDGET SUMMARY
NON-FEDERAL FUNDS

Budget Categories	Project Year 1 (a)	Project Year 2 (b)	Project Year 3 (c)	Project Year 4 (d)	Project Year 5 (e)	Total (f)
1. Personnel						
2. Fringe Benefits						
3. Travel						
4. Equipment						
5. Supplies						
6. Contractual						
7. Construction						
8. Other						
9. Total Direct Costs (Lines 1-8)						
10. Indirect Costs						
11. Training Stipends						
12. Total Costs (Lines 9-11)						

SECTION C – BUDGET NARRATIVE (see instructions)

Instructions for ED 524

General Instructions

This form is used to apply to individual U.S. Department of Education (ED) discretionary grant programs. Unless directed otherwise, provide the same budget information for each year of the multi-year funding request. Pay attention to applicable program specific instructions, if attached. You may access the Education Department General Administrative Regulations cited within these instructions at: http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html. You may access requirements from 2 CFR 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" cited within these instructions at: https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards.

You must consult with your Business Office prior to submitting this form.

Section A - Budget Summary
U.S. Department of Education Funds

All applicants must complete Section A and provide a break-down by the applicable budget categories shown in lines 1-11.

Lines 1-11, columns (a)-(e): For each project year for which funding is requested, show the total amount requested for each applicable budget category.

Lines 1-11, column (f): Show the multi-year total for each budget category. If funding is requested for only one project year, leave this column blank.

Line 12, columns (a)-(e): Show the total budget request for each project year for which funding is requested.

Line 12, column (f): Show the total amount requested for all project years. If funding is requested for only one year, leave this space blank.

Indirect Cost Information: If you are requesting reimbursement for indirect costs on line 10 the indirect cost rate to be charged to the grant must be entered in the applicable field on line 10, and the following information is to be completed by your Business Office.

(1): Indicate whether or not your organization has an Indirect Cost Rate Agreement that was approved by the Federal government. If you checked "no," ED generally will authorize grantees to use a temporary rate of 10 percent of budgeted salaries and wages (**complete (4) of this section when using the temporary rate**) subject to the following limitations:

(a) The grantee must submit an indirect cost proposal to its cognizant agency within 90 days after ED issues a grant award notification; and

(b) If after the 90-day period, the grantee has not submitted an indirect cost proposal to its cognizant agency, the grantee may not charge its grant for indirect costs until it has negotiated an indirect cost rate agreement with its cognizant agency.

(2): If you checked "yes" in (1), indicate in (2) the beginning and ending dates covered by the Indirect Cost Rate Agreement. In addition, indicate whether ED, another Federal agency (Other) or State agency issued the approved agreement. If you check "Other," specify the name of the Federal or other agency that issued the approved agreement.

(3): If you check "no" in (1), indicate in (3) if you want to use the de minimis rate of 10 percent of MTDC (see 2CFR § 200.68). If you use the de minimis rate, you are subject to the provisions in 2 CFR § 200.414(f). Note, you may only use the 10 percent de minimis rate if you are a first-time Federal grant recipient, and you do not have an Approved Indirect Cost Rate Agreement. You may not use the de minimis rate if you are a State, Local government, or Indian Tribe, or if your grant is funded under a training rate or restricted rate program.

(5): If you are applying for a grant under a Restricted Rate Program (34 CFR 75.563 or 76.563), indicate whether you are using a restricted indirect cost rate that is included on your approved Indirect Cost Rate Agreement, or whether you are using a restricted indirect cost rate that complies with 34 CFR 76.564(c)(2). Note: State or Local government agencies may not use the provision for a restricted indirect cost rate specified in 34 CFR 76.564(c)(2). Check only one response. Leave blank, if this item is not applicable.

(6): For Training Rate Programs, ED regulations limit **non-governmental entities** to the recovery of indirect costs on training grants to the grantee's actual indirect costs, as determined by its negotiated rate agreement, or 8 percent of a MTDC, whichever is lower (see EDGAR § 75.562(c)(4)). The 8 percent limit also applies to cost-type contracts under grants, if these contracts are for training as defined in EDGAR § 75.562(a). If a n**on-governmental entity** that receives a grant under a training grant program does not have an approved indirect cost rate and wants to recover indirect costs, it may use a temporary rate of 10 percent of budgeted direct salaries and wages, but it must submit an indirect cost rate proposal to its cognizant agency for indirect costs within 90 days after ED issues the GAN. After the 90-day period, the government entity may not charge its grant for indirect costs until it has negotiated an indirect cost rate agreement.

Section B - Budget Summary
Non-Federal Funds

If you are required to provide or volunteer to provide cost-sharing or matching funds or other non-Federal resources to the project, these should be shown for each applicable budget category on lines 1-11 of Section B.

Lines 1-11, columns (a)-(e): For each project year, for which matching funds or other contributions are provided, show the total contribution for each applicable budget category.

Lines 1-11, column (f): Show the multi-year total for each budget category. If non-Federal contributions are provided for only one year, leave this column blank.

Line 12, columns (a)-(e): Show the total matching or other contribution for each project year.

Line 12, column (f): Show the total amount to be contributed for all years of the multi-year project. If non-Federal contributions are provided for only one year, leave this space blank.

Section C - Budget Narrative [Attach separate sheet(s)]
Pay attention to applicable program specific instructions, if attached.

1. Provide an itemized budget breakdown, and justification by project year, for each budget category listed in Sections A and B. For grant projects that will be divided into two or more separately budgeted major activities or sub-projects, show for each budget category of a project year the breakdown of the specific expenses attributable to each sub-project or activity.

2. For non-Federal funds or resources listed in Section B that are used to meet a cost-sharing or matching requirement or provided as a voluntary cost-sharing or matching commitment, you must include:

   a. The specific costs or contributions by budget category;
   b. The source of the costs or contributions; and
   c. In the case of third-party in-kind contributions, a description of how the value was determined for the donated or contributed goods or services.

   [Please review cost sharing and matching regulations found in 2 CFR 200.306.]

3. If applicable to this program, provide the rate and base on which fringe benefits are calculated.

4. If you are requesting reimbursement for indirect costs on line 10, this information is to be completed by your Business Office. Specify the estimated amount of the base to which the indirect cost rate is applied and the total indirect expense. Depending on the grant program to which you are applying and/or your approved Indirect Cost Rate Agreement, some direct cost budget categories in your grant application budget may not be included in the base and multiplied by your indirect cost rate. For example, you must multiply the indirect cost rates of "Training grants" (34 CFR 75.562) and grants under programs with "Supplement not Supplant" requirements ("Restricted Rate" programs) by a "modified total direct cost" (MTDC) base (34 CFR 75.563 or 76.563). Please indicate which costs are included and which costs are excluded from the base to which the indirect cost rate is applied.

   When calculating indirect costs (line 10) for "Training grants" or grants under "Restricted Rate" programs, you must refer to the information and examples on ED's website at: http://www.ed.gov/fund/grant/apply/appforms/appforms.html.

   You may also contact (202) 377-3838 for additional information regarding calculating indirect cost rates or general indirect cost rate information.

5. Provide other explanations or comments you deem necessary.

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is **1894-0008**. The time required to complete this information collection is estimated to vary from 13 to 22 hours per response, with an average of 17.5 hours per response, including the time to review instructions, search existing data sources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4537. If you have comments or concerns regarding the status of your individual submission of this form, write directly to (insert program office), U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, D.C. 20202.

SECTION C: BUDGET NARRATIVE

Budget Category	Use of Funds Justification	Total Amount
Equipment	The 14 non-public schools and the 29 ASDOE schools through the Elementary and Secondary Divisions and the Offices of Curriculum and Instruction and Information Technology will use the funds to purchase educational technology, including hardware, software, and connectivity. The activities will cover the following: • LAN-Hardware-Outdoor and -Indoor Meral AP Wireless Routers: Provide students and teachers to connect via wireless connectivity outside and inside the classrooms. Teachers and administrators will be able to monitor activities remotely • DL-Service Provider-Mifi: Provide Internet access to students and teachers in remote areas. • LAN-Network-Internal Connection: Provide upgrade to Internet connection to sites; upgrade IDF and MDF with equipment and connection, which will provide more • Hub-User Equipment-Tablet/iPad and accessories; Apple laptop and accessories; Chromebook and accessories: To support virtual and face-to-face teaching and learning. For students and teachers to access teaching-learning materials via the Internet and for teachers' use during professional development • Hub-User Equipment-SmartPhone: Provide access to lessons and other learning information for students who do not have access to the Internet in their homes and villages • Network Upgrade Equipment and tools: Assist technicians with the network upgrade to provide more efficient connectivity for students, teachers, and administrators • Multi-purpose printers and scanners and laminating and binding machines: For printing and teaching-learning resources for students' learning packets	$13,036,546.00

	• Fortinet Security equipment: To safeguard from intrusion and cyber-security threats • User Equipment-Cameras/SMART Board: For recording lessons and professional development and provide instructional support • Hub-User Equipment Management System: Track all equipment purchased under the ESF-SEA funds • Hub-Application-Zoom: Allows team meeting and online classroom opportunities • Purchase MS Office 365 software: For students and teachers to create templates and produce lessons and learning assignments • Single bed: To accommodate sick children • Student desks: To promote social distancing • Sinks for handwashing: To prevent virus infection	
Supplies	The 14 non-public schools and the 29 ASDOE schools through the Elementary and Secondary Divisions and the Offices of Curriculum and Instruction and Information Technology will use the funds to purchase the following: • Sanitation and cleaning supplies: To sanitize and clean classrooms and other facilities of the schools • Emergency Supplies: To respond to the emergency needs with first aid kits, non-contact digital infrared thermometers • COVID-19-Prevention Supplies, such face masks, hand sanitizers, disposable washcloths, disinfecting mats/shoes clean mats, backpack sprayers • Pillows and bed sheets: For the nursing room • School and office supplies, such as photocopying paper, toners, pens, markers, binders: For teaching-learning activities	$6,568,099.00

	• E-books and other teaching-learning resources for various course, such as English language arts, mathematics, science, social studies, dual language, music, art, physical education: To provide relevant and rigorous learning experiences for students • Licenses and subscriptions for Achieve3000, IXL Math, Striving Readers	
Contractual	The 14 non-public schools and the 29 ASDOE schools through the Elementary and Secondary Divisions and the Offices of Curriculum and Instruction and Information Technology will use the funds to purchase the following services: • Contractual Services and Maintenance: Provide basic maintenance of internal connections and servers • Website subscription: For website development for academic programs and activities to public access to standards, resources • Development of G-Suite, Zoom, Google classroom • Internet Service • Sanitation and cleaning services	$2,673,879.00
Other	The 14 non-public schools and the 29 ASDOE schools through the Elementary and Secondary Divisions and the Offices of Curriculum and Instruction and Information Technology will use the funds for the following activities and services: • Stipends for Teacher Aides • Stipends for Cleaners • Stipends for lesson developers for students' learning packets for grades 1-8 English language art, mathematics, science, and social studies • Car mileage for use of personal vehicles to monitor the implementation of the activities and services funded under the ESF-SEA funds	$16,043,408.00

	• Professional development on:
	
	  o building distance learning capacity, meaningful
	  o integrating home and community resources in distance learning	

Administrative Cost: $1,916,097.00

- ASDOE has reserved
  - $224,648. 00 for supplies
  - $500,000.00 for Other Expenses that cover for professional development and monitoring activities
  - $1,191,449 for equipment to ensure social distancing is implemented in the schools by providing student individual desks.

American Samoa Department of Education Internal Control Plan

Management Structure

The American Samoa Department of Education (ASDOE) has an established procedural framework, the *Grants Policy and Procedures Manual - November 2018*, that delineates responsibilities for grants administration and financial management of all federal grant awards to the American Samoa Department of Education (ASDOE).

The proper expenditure of grant funds, including Education Stabilization Funds (ESF) is central to the organization's ability to achieve the intended purpose of the grant. To ensure that grant-funded projects are completed successfully within the agreed-upon timeframe, it is important for all individuals involved in grants administration to understand the processes required, and to understand their particular role. Section 1.3 of the *ASDOE Grants Policy and Procedures Manual - November 2018*, outlines roles and responsibilities for managing and monitoring the SEA and sub-grantee recipients of grants. See Appendix A for the current ASDOE organization chart and ESF-SEA COVID Task Force Routing Form for Approvals.

GRANT COORDINATOR/PROJECT MANAGER/PRINCIPAL

The Grant Coordinator or Project Manager is the individual primarily responsible for ensuring that the grant's goals and objectives are met within the agreed-upon timeframes established in the grant award. Principals take on the responsibilities of a Project Manager but are not the point of contact when dealing with school based Consolidated Grant budgets. The Grant Coordinator/Program Manager/Principal's responsibilities include, but are not limited to:

- Ensure that grant funds are used in accordance with the grant budget.
- Ensure that grant-funded activities and purchases are allowable, reasonable, and achieve the purpose of the grant.
- Provide timely data and reports to the Director
- Verify Purchase Requisitions.
- Coordinator/ Project Manager monitors the activity of any sub-grantees where applicable to ensure that they accomplish their stated goals and objectives and adhere to grant terms and conditions.

- Maintain well-organized grant files that contain all required and pertinent documents related to the performance of the grant award goals and objectives; annually certify that the grant files are complete.

FISCAL OFFICER

The Fiscal Officer or Chief Financial Analyst handles most of the financial-related aspects of grant administration and is primarily responsible for ensuring that grant funds are properly accounted for, i.e., grant expenditures are allowable, are adequately documented, and are accurately recorded in the accounting system. The Fiscal Officer's responsibilities include, but are not limited to:

- Establish a system for tracking grant expenditures by budget category.
- Prepare purchase requests and direct payment vouchers.
- Ensure that expenditures contain the proper accounting codes and are charged to the appropriate grant account.
- Ensure that funding is available in the budget categories affected.
- Prepare the SF-425 Federal Financial Report or other financial reports as required.
- Reconcile grant financial data with ASG Treasury's accounting system to ensure that financial records are accurate and up to date.
- Maintain a well-organized financial file that contains all documentation pertinent to the financial management of the grant.

CHIEF FINANCIAL ANALYST

The Chief Finance Analyst has the primary responsibility of overseeing all the financial-related aspects of grant administration for the ASDOE. The Chief Financial Analyst's responsibilities include, but are not limited to:

- Establish a system for tracking grant expenditures by Grant.
- Prepare purchase requisitions where appropriate.
- Review all purchase requisitions to ensure that expenditures contain the proper accounting codes and are charged to the appropriate grant account.
- Ensure that funding is both allowable and available in the budget categories affected.
- Prepare/Review the initial BUD-202s to establish the grant accounts and prepare/review subsequent BUD-202's when necessary to transfer funds between budget categories.
- Prepare/Review the SF-425 Federal Financial Reports or other financial reports as required.

- Reconciles grant financial data with ASG Treasury's accounting system to ensure that financial records are accurate and up to date.
- Maintain a well-organized financial file that contains all documentation pertinent to the financial management of all ASDOE grants.
- Follow up with other ASG agencies in tracking purchase requisitions from initiation to final payment.
- Prepare quarterly expenditure versus budget reports to track expenditure rates per grant.
- Be the point-of-contact for all audit activities.

CONTRACTS OFFICER

The Contracts Officer has the responsibility to initiate and oversee all contractual agreements for the ASDOE. The Contracts Officer's responsibilities include, but are not limited to:

- Aid in the development of the scope of work and budget for contractual services.
- Ensure that all contracts follow ASG and Federal rules and guidelines.
- Monitor payment requests to ensure that payment requests match work completed.
- Work with other ASG departments in the preparation, execution of contracts, and subsequent payment requests related to contractual agreements.
- Supervise contract closeout processes to ensure that work has been completed and that funds have been properly disbursed.

DEPUTY DIRECTORS

The Deputy Directors oversee divisions or offices within the ASDOE. Their responsibility includes the supervision, oversight, and quality assurance of all grant activities under their direct supervision.

DIRECTOR OF EDUCATION

The Director of Education is ultimately responsible for the performance of the grant management teams. It is incumbent upon the Director to provide an appropriate level of supervision and establish an overall work environment conducive to effective grants management. Responsibilities include:

- Ensure that staff assigned to the grant process possess the knowledge and skills necessary to manage Federal grant programs effectively.
- Review and authorize all expenditures and reports prepared by the Grant Coordinator and/or Fiscal Officer.

- Provide an environment that encourages the practice of strong internal controls.
- Provide the level of supervision necessary to ensure that grant managers are performing their duties at an acceptable level of competence and take corrective action when appropriate.
- Serve as the point-of-contact between the ASDOE and the funding agency.

ASDOE has designed a requisition and purchasing process specifically for the Education Stabilization Funds (ESF) that includes a COVID-19 Expenditure Request Form and Education Stabilization Funds Routing Slip to strengthen the internal control process. The ESF expenditure form requires: a detailed description of the expenditure and purpose; justification; cost; and signatures of the requestor, ASDOE Grants Manager, ASDOE Fiscal Officer, ASDOE Director, COVID-19 Task Force Chairman, and Governor. The ASDOE routing slip for expenditure requests is in Appendix B.

Internal Control for Expenditures / Approval Process

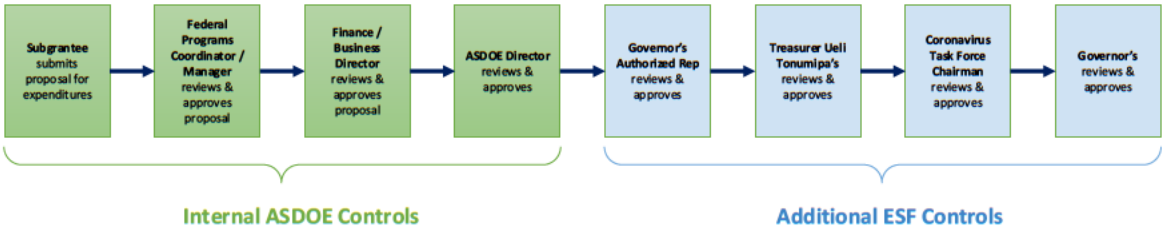
(1) Sub-grantee Submits Proposal for Expenditures

(2) → Proposal is reviewed by Project Leads and the Federal Programs Division

(3) → Approved Plan is reviewed and approved by the Director

(4) → Approved Plan is reviewed and approved by other members of the COVID-19 Task Force (Governor and ASG Finance Office).

Control Process for ESF (FINAL & CONSISTENT WITH ROUTING SLIP)



Comment:
We are truncating the number of internal approvals to expedite the process; however, to ensure appropriate use of funds overall, we have added additional ESF controls with external review.

Risk Assessment

Subrecipient means a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.

ASDOE conducts a risk assessment based on a Risk Assessment Questionnaire and past performance. See Appendix C.

Each subrecipient receives training on the allowable usage of funds as outlined in the *Elementary and Secondary School Emergency Relief Fund Frequently Asked Questions about the Elementary and Secondary School Emergency Relief Fund (ESSER Fund) and Certification and Agreement for Funding under the Education Stabilization Fund* (see https://www2.ed.gov/about/offices/list/ope/caresact.html).

Internal Controls to Prevent Risk or Mitigate Risk for Purchasing / Procurement / Property using ESF funds

ASDOE Grants Policy and Procedures Manual - November 2018 (section 5.3.2 through 5.3.5; sections 5.5.1 through 5.5.4)

5.3. Grant Expenditures: ASG Procurement Rules

The proper, legal expenditure of grant funds is critical to an organization's ability to achieve the intended purpose of the grant. While both the ASG Budget Department and Treasury review expenditures during the payment process, it is the grant recipient (i.e. ASDOE) who bears the primary responsibility for ensuring that grant funds are appropriately spent, in accordance with the grant's terms and conditions.

The Grant Coordinator/Grant Manager and Fiscal Officer/Chief Finance Analyst are responsible for determining whether a particular expenditure can be charged against a specific grant. In making this determination, the Grant Coordinator/Grant Manager and Fiscal Officer/Chief Finance Analyst should be able to answer "Yes" to the following questions:

(1) Is the expense allowable?
(2) Is the expense authorized by the approved grant budget?
(3) Are there grant funds available in the approved budget category?
(4) Is the expense reasonable? Timely?
(5) Would this supplement local funds?

Documentation

Required documentation for all Purchase Requisitions is based on the total cost of the materials/services being requested

- Purchase requisitions for materials/services under $2,500 need only an invoice from a single vendor. Requesters should use a selection of vendors to supply needs and should not rely on a single vendor to meet all needs.
- Purchase requisitions for materials/services equal to $2,500 but less than $10,000 must include quotes from three separate vendors. All quotes must be retained.
- The Office of Procurement must issue a Purchase Requisition for materials/services greater than or equal to $10,000 for a competitive bid, or a sole source request must be submitted to the Chief Procurement Office for approval.

- Sole source approval requests will only be approved if justification is provided that the vendor is the only source for procurement of requested materials/services, or the requested services are a continuation of existing services.

After the Fact Payment Requests

ASG procurement law prohibits after the fact requests for payments for materials/services that have already been provided.

5.3.1 ASDOE Internal Approval Process (Materials/Minor Services)

Step 1: Originators

Purchase Requisitions (PR) for materials and minor services can originate from three sources; Schools, Divisions, or Central Office. The approval process is dependent on where the requisition is originated.

- Requisitions originating at the school level will proceed to step (2);
- Requisitions originating at the division level will proceed to step (3); and
- Requisitions originating at the central office will proceed to step (4).

Step 2: Principal Approval

Purchase Requisitions, originating at the school level, are approved by the school principal. The school principal is responsible to verify that the purchase requisition has been filled out properly.

Step 3: Assistant Director Approval

The Assistant Director of either Elementary/Secondary Education or the Assistant Director with direct supervisory responsibility for funds approves the Purchase Requisitions originated at the school level. Assistant Directors also act as the initial approvers for Purchase Requisitions originating at the Division Levels. Assistant Directors have the responsibility to verify that the materials/services requested are appropriate.

Step 4: Grant Coordinator/Grant Manager

Reviews the requisition to ensure that the items/services requested are included in the program and budget narratives. Verification is provided through signature on the procurement routing form (See Appendix A).

Step 5: Deputy Director Approval

The Deputy Directors of Instruction and Support Services are tasked with verification that all proposed purchase requisitions are appropriate and in alignment with the overall mission and goals of the department.

Step 6: Finance Officer/Business Office Approval

The Finance Officer/Business Office staff reviews all purchase requests to ensure account numbers are correct; that procurement policy and procedures are met; that funds are available; and that requested materials/services are appropriate and allowable.

Step 7: Chief Financial Analyst Approval

The Chief Financial Analyst will provide final ASDOE approval on requests with a total value less than $5,000. For requests exceeding $5,000 the Chief Financial Analyst will review the documents and submit them to the Director of Education for signature.

Step 8: Director of Education Approval

The Director of Education is the final approver for all contracts and Purchase Requisitions.

Once final approval is completed, documentation will be electronically transmitted to the Office of Budget and Planning and will follow the ASG workflow process. When a problem is identified at any step in this process the documentation will be returned to the originator for correction.

5.3.2 ASDOE Internal Approval Process (Contractual Services)

Contractual Service Requests (Contracts) follow the same internal approval process with the added step that all contracts are under the supervision of the Contract Officer. The Contract Officer takes on the same responsibilities of the Chief Finance Officer when dealing with contracts.

Initiators are responsible for developing the Scope of Work for services/materials to be provided. The Scope of work must provide a detailed description of work to be completed or specifications for desired materials and must also provide a timeframe for completion/delivery of all tasks.

Initiators must also provide either a detailed budget, if possible, or a projected total cost for the required services/materials.

The final decision on how contracts are processed is the responsibility of the ASG Chief Procurement Officer. While contracts with total expected cost of $10,000 or more are normally put out for a formal bid process, the Chief Procurement Officer may decide to follow this process with contracts of lesser value. The Chief Procurement Officer will also decide whether to put these services out as either a request for Proposals (RFP) or a request for Bid (RFB). RFPs use a criterion-based scoring matrix while RFB's are only scored on cost.

As with materials requests, Sole Source Justification can only be used for services where the proposed contractor is the only provider of the service or the requested service is a continuation of previous work. It is rare that there would be only one provider that can provide services, but ASDOE often deals with providers, such as the University of Hawaii, which is sole source eligible for the Cohort program as it is a continuation of previous work.

5.3.3 ASG External Approval Process

Direct Payment Vouchers

Direct Payment Vouchers (DPV) are used for minor services such as repairs of printers and computers, etc. or for the purchase of minor supplies. Direct Payment Voucher cost may not exceed $500.00 and must be pre-approved by ASDOE. The main difference between a DPV and a Purchase Requisition (PR) is that a verified signed invoice acts as the receiving report for a DPV while a Procurement Receiving Report is needed for a Purchase Requisition.

The external review process for Direct Payment Vouchers once they are approved at ASDOE includes:

- The Office of Budget and Planning (Verification/Obligation of Funding)
- Grants Treasury (Allowability of Expenditure, Drawdown of Funds)

Purchase Requisitions

As detailed above, Purchase Requisitions are used for any proposed non-contractual expenditure with an estimated cost in excess of $500.00. Purchase Requisitions (as stated in above) require documentation based on the total cost of the materials/services being requested.

- Purchase Requisitions for materials/services under $2,500 need only an invoice from a single vendor. Requestors should use a selection of vendors to supply needs and should not rely on a single vendor to meet all needs.

- Purchase Requisitions for materials/services equal to $2,500 but less than $10,000 must include quotes from three separate vendors.
- The Office of Procurement must put out Purchase Requisitions for materials/services greater than or equal to $10,000 for bid, or a "sole source" request must be submitted to the Chief Procurement Office for approval.

Note: Sole Source approval requests will only be approved if justification is provided that the vendor is the only source for procurement of requested materials/services or that the services requested are a continuation of existing services.

The external review process for Purchase Requisitions (following the ASDOE Routing/Approval Process) for expenditures less than $10,000 includes:

(1) The Office of Budget and Planning (Verification/Obligation of Funding)
(2) Grants Treasury (Allowability of Expenditure, Drawdown of Funds)
(3) Office of Procurement (Issuance of Purchase Order)
(4) For Purchase Requests greater than $10,000 step 3 includes:
    a. Office of Procurement
        i. Review/Approval of Sole Source Justification and issuance of Purchase Order if approved or;
        ii. Implementation of a formal bid process.
        iii. Awarding of Bid and issuance of Purchase Orders.

5.3.4 Contracts

The external review process for contractual requests less than $10,000 includes:

(1) The Office of Budget and Planning (Verification/Obligation of Funding)
(2) Office of Procurement
    a. Review of Scope of Work/Budget b. Issuance of Contract.
(3) Routing of Contract for Signatures
    a. Contractor b. Director of Education c. Director of Office of Budget and Planning (Obligation of funds) d. Attorney General's Office (Legality of Contract) e. Chief Procurement Officer

Contractual agreements are binding only after the Chief Procurement Officer has signed the contract.

For Contractual Request exceeding $10,000 or when determined that a bid process is warranted step 2 would include:

(1) Office of Procurement
    a. Review/Approval of Sole Source Justification and issuance of Contractual Agreement if approved or;
(2) Implementation of a formal bid process. c. Awarding of Bid and issuance of Contract.

5.3.5 Execution of Contracts

Duration of contracts

Multiple year contracts may be awarded when allowable, and when significant start funds warrant the amortization of these funds over an extended time period. Multiple-year contracts should not exceed three years and may have additional optional years with a limit of two years. Evaluation and monitoring requirements must be specified and adhered to.

All other contracts will be contracted on an annual basis. Simple extension of existing contracts should be avoided. A complete review of past efforts and a cost analysis of future work needed must be completed before a new contract or contract modification is issued. Execution of annual contracts does not preclude the use of Sole Source when justified as long as budgets are negotiated on an annual basis.

5.5.1. Property

Property purchased (in whole or in part) with federal funds should be used for the purpose of that federal program and accounted for in accordance with applicable federal and local statutes, rules, and regulations.

5.5.2. Disposition of Equipment

When equipment acquired under a grant is no longer needed for the original project or program or for other activities currently or previously supported by a federal agency, equipment will be disposed of in the following way:

- For items costing less than $1,000: Equipment may be retained, sold, or disposed of with no further obligation to the awarding agency; income received from any sales do not need to be reported.
- For items costing over $1,000 (and still in working order): Equipment may be retained or sold and the awarding agency (funder) may retain any income from sale.

For the sale of property with a current per unit fair market value of over $1,000, the net amount received from sales will remain with the ongoing program. This type of income must be amended into a current year's project in which the sale occurred (as special revenue) and

identification of income is necessary to meet reporting requirements of the US Department of Education. If the agency is no longer receiving funds for the particular project or program, the income from such equipment sales will be forwarded to the US Department of Education.

Complete documentation for this type of income and expenditures must be maintained for monitoring and auditing purposes.

5.5.3. Disposition of Real Property

Disposition of real property will be handled on an individual basis. ASDOE will also coordinate real property dispositions with the program coordinator responsible for the particular project or program from which the real property was purchased. Property purchased entirely with state funds shall meet the minimum requirements of the Auditor General as defined in the American Samoa Administrative Code (Title 37).

5.5.4. Inventory of Property

All grant funding recipients must ensure that a complete physical inventory of all property is taken at least once each fiscal year.

Grant Documentation Maintenance

Adequate documentation is an essential component of effective internal controls. Documentation provides a chain of evidence that illustrates how the grant recipient ensures the proper use of grant funds, the accuracy of financial records and reports, and the successful completion of grant goals and objectives as set-forth in the approved performance measures.

ASDOE establishes and maintains both a financial and program file for all grants. Files are aggregated by fiscal year and maintained intact for a period of at least five years. Excerpts from the ASDOE Grants Policy and Procedures Manual are below.

ASDOE Grants Policy and Procedures Manual - November 2018

> ### 4.4. Establishing & Maintaining Grant Accounts
>
> A grant recipient cannot charge expenditures against a new grant award until a grant account has been established in Treasury's *One Solution* System. To establish a grant account in the system, the grant recipient must provide the proper documentation to the Budget Office and the Treasury Department.

The **ASG Form BUD-202** is the authorizing document used to establish a new grant account in *One Solution.* To initiate this process, a Bud-202 package must be prepared. A **BUD-202 package** includes:

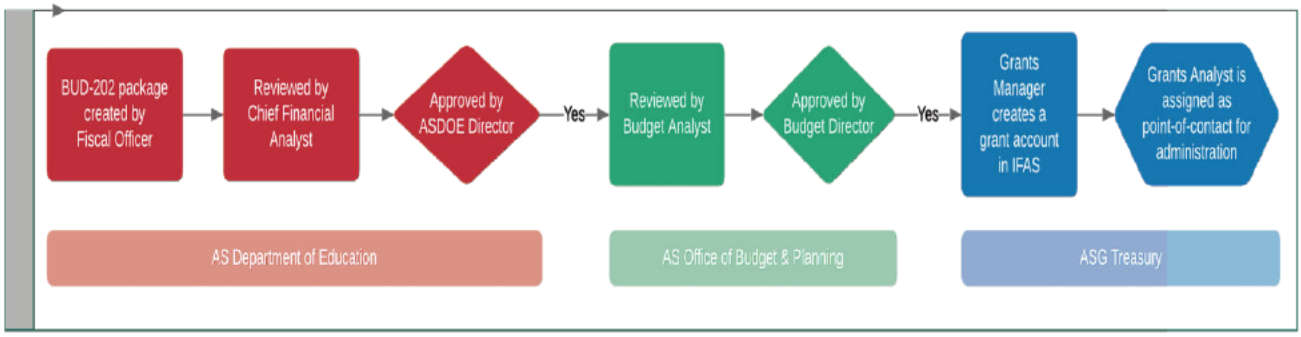
- BUD-202, completed and authorized;
- Grant award letter;
- Final approved budget;
- Grant narrative; and
- Grant terms and conditions

Within ASDOE, the BUD-202 package is prepared by the Fiscal Officer and is submitted to the Chief Financial Analyst for review. Then, the BUD-202 package is submitted to the Director of Education for signature and transmitted to the Office of Budget and Planning.

At the Office of Budget and Planning, the Budget Analyst will review the BUD-202 for completeness and accuracy, based on a review of the supporting grant documents. Failure to provide the Budget Department with all of the required documents will result in the BUD-202 being returned to the department for corrective action. Once the BUD-202 package has been reviewed and signed off by the Budget Director, the documents will be forwarded to the Treasury Department, Grants Division.

At the Treasury Department Grants Division, the Grants Manager (or designee) is responsible for establishing the grant account in *One Solution*. Once the grant account is established, the Grants Manager will assign the grant to a Grants Analyst, who will be the point-of-contact at Treasury throughout the grant administration process. It is the responsibility of the grant recipient to contact the Grants Division and obtain the grant account number from the Grants Analyst.

Process to Establish Grant Account



* Note: IFAS has been replaced by *One Solution.*

4.5. Establishing & Maintaining Grant Files

Grantees must have proper management systems in place to receive a grant and expend funds. **Grantees are responsible for full and timely collection and reporting of data concerning grant funds as stipulated in the Grant Award Notification**. Documentation serves to demonstrate to federal grantor agencies and outside auditors that the grant recipient has accomplished its goals and complied with the terms and conditions of the grant.

Requirements and procedures are established to ensure that grant funds are expended and accounted for in a method that provides accuracy, uniformity, and consistency.

Since most grants have both a financial and programmatic component to them, ASDOE requires that the grant recipient establish and maintain both a financial file and a program file.

Grant financial files contain, at minimum, the following documents:

- Grant application
- Grant award letter and final approved budget
- ASG Form BUD-202 with all amendments
- General ledger detail (monthly reports from Treasury)
- SF-425 Federal Financial Reports (FFRs) or other financial reports as required
- Federal Descriptive Reports (FDR) / Program Reports
- Correspondence from grantor agency (letters, emails, etc.)
- Grant Adjustment Notices (GAN) - Financial Related
- Documentation for in-kind match, if applicable

Grant program files should contain documentation concerning grant program activity. While this may vary, files may include documents such as:

- Narrative portion of grant application, including goals and objectives of the grant
- Grant Adjustment Notices (GAN) — Program Related
- Copies of contracts, including statement of work and any modifications, and semi-annual personnel certifications
- Capital equipment purchases, including tracking numbers, location, and evidence that equipment is used for grant-related purposes
- Applications for sub-grantees, if applicable
- Signed/dated program and sub-grantee quarterly and annual monitoring documentation.
- Documentation of correspondence with USDE and sub-grantees (e.g., emails, phone call notes)
- Agenda and sign-in sheets for conferences or training sessions
- Program/project evaluation data and evaluation reports
- Documentation of site visits by grantor agency, Inspector General, or any other Federal entity, including reports, if applicable.

The Fiscal Officer/Chief Finance Analyst for each grant should maintain the grant financial and program files. The Chief Finance Officer must maintain a separate financial, and program file for all ASDOE grants. The ASDOE

Grants Office must maintain and review the Consolidated Grant files quarterly. **Files must be aggregated by fiscal year and must be maintained intact for a period of at least five years**.

5.6. Accounts and Records

5.6.1. Retention and Access to Records

Requirements related to retention and access to project/grant records, are determined by federal and local rules and regulations. 2 CFR §200.333, addresses the retention requirements for records that apply to all financial and programmatic records, supporting documents, statistical records, and all other non-federal entity records pertinent to a federal or project award.

If any litigation, claim, or audit is started before the expiration date of the retention period, the records must be maintained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

Access to records of the grantee and subgrantees and the expiration of the right of access is found at CFR §200.336 (a) (c), which states:

- **Records of non-Federal entities.** The Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of non- Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity's personnel for the purpose of interview and discussion related to such documents.

- **Expiration of right of access.** The rights of access in this section are not limited to the required retention period but last as long as the records are retained.

Retention requirements for records. CFR §200.333

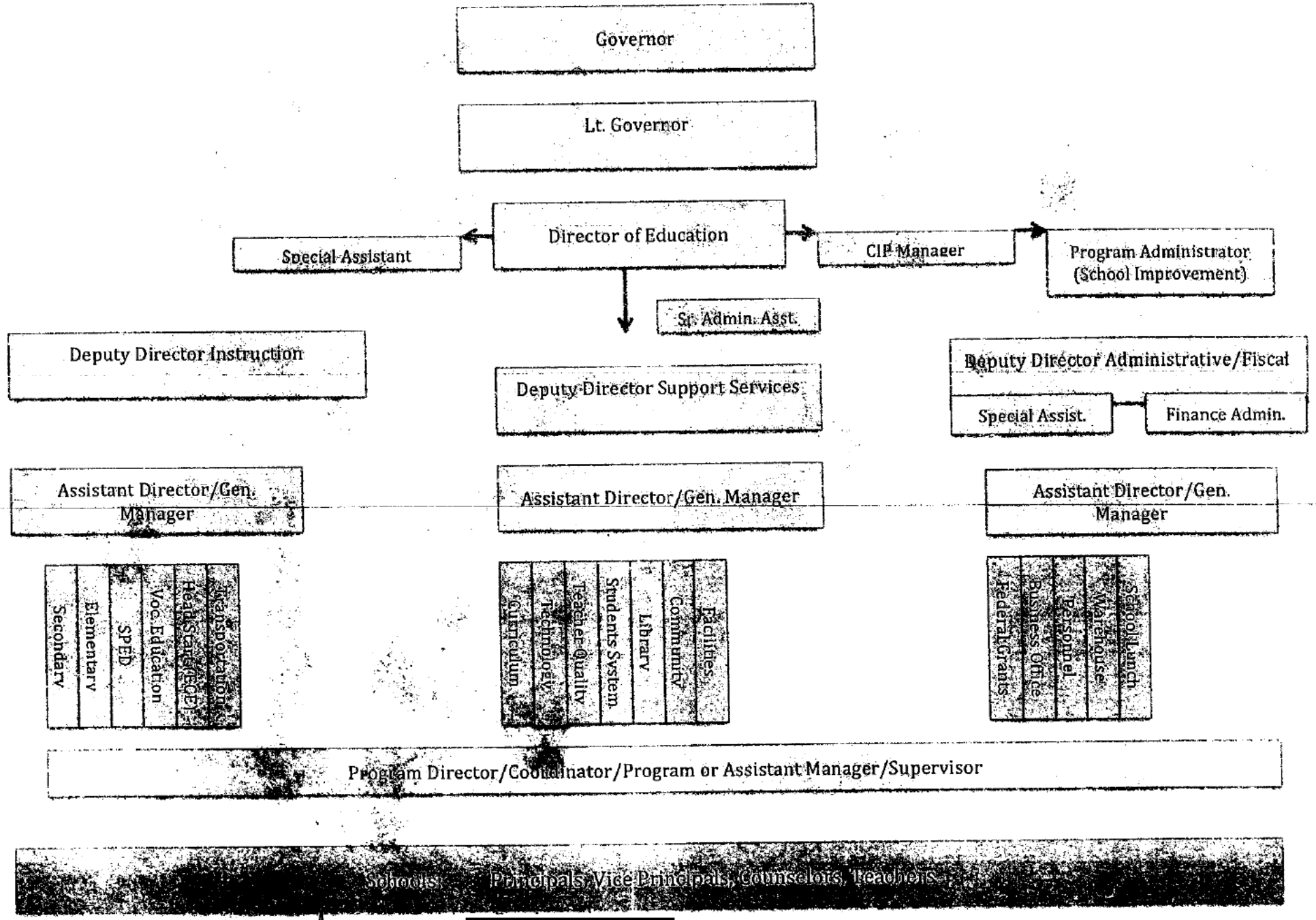
The expenditure of Federal grant funds is a highly scrutinized activity. In any given year, a grant recipient may be the subject of one or more of the following:

(1) Single Audit review,
(2) Federal grantor program/financial review,
(3) Inspector General audit, Territorial Audit Office review, or
(4) Government Accountability Office (GAO) review.

ESF grant activity documentation to be retained to demonstrate that expenditures are allowable, reasonable, and necessary, is included in the *ASDOE Grants Policy and Procedures Manual - November 2018, Sections 5.4.1 - 5.4.13*.

Examples of the types of documentation to retain and that auditors may request from the ASDOE or subgrantees to demonstrate that the expenditure is allowable, reasonable, and necessary include:

- Planning and monitoring documents (sign-in sheets, meeting minutes, agendas)
- Reallocation/ Amendment Request Documentation
- Personnel Costs (timecards, payroll distribution)
- Time and Effort Documents (semi-annual certifications)
- Travel Documents (pre-approval, expense reports, agendas)
- Supplies (requisitions, invoices, proof of receipt)
- Training (agenda, sign-in, minutes, certificates, presenter credentials)
- Contracts (invoices, deliverables, approved contract)
- Equipment (invoice, Inventory records, appropriate property tag)
- Itemized budget monthly reconciliation reports



Governor

[redacted] 11/26/12

Director of Education

Director of Human Resources

AMERICAN SAMOA GOVERNMENT
COVID-19 EXPENDITURE REQUEST FORM

TO BE COMPLETED BY REQUESTOR FOR ALL COVID-19 PLANNED EXPENDITURES	
Today's Date:	Name of Department/Agency:
Name and Title of the Requestor:	
Purpose &. Description of Expenditure:	
Justification of Requested Expenditure:	
Total Cost of the Expenditure	
Agency Director's Signature:	
Governor's Authorized Representative (GAR):	
Treasurer Ueli Tonumaipe'a Signature:	
Coronavirus Task Force Chairman Signature:	
Governor Lolo M. Moliga, Approving Authority:	

American Samoa Department of Education
Education Stabilization Fund (ESF) Risk Self-Assessment

A. Subrecipient's Profile

Name and physical address of entity:

Program Contact Information:

Name:	
Email:	
Work Phone:	
Cell Phone:	

Finance Contact Information:

Name:	
Email:	
Work Phone:	
Cell Phone:	

Approximate total organization-wide annual operating budget:

	Previous Fiscal Year	Current Fiscal Year
Federal Funds		
Non-Federal Funds		

Other information about entity:

QUALITY OF MANAGEMENT SYSTEMS AND ABILITY TO MEET THE MANAGEMENT STANDARDS

1.1 Do you have internal controls that govern program delivery on the topics of:

a. Appropriate supervision of staff _____ Yes _____ No

b. Unit cost analysis and management _____ Yes _____ No

c. Relevant documentation of services/goods delivered _____ Yes _____ No

d. Safeguarding funds, property and other assets against loss from unauthorized use or disposition _____ Yes _____ No

1.2 Does the organization have written standards of conduct covering real or perceived conflict of interest related to actions of employees engaged in the selection, award or administration of contracts supported by grant awards? Yes No

1.3 How many years of experience does the project leader have managing the scope of services required under this program?

a. 3 or more years _____
b. b. Less than 3 years _____

1.4 Does the organization have a time and effort system that:

c. Records all time worked, including time not charged to awards? _____ Yes _____ No
d. Is signed - off by the employee and a supervisor _____ Yes _____ No
e. Includes an approved methodology? _____ Yes _____ No

1.5 Reports are an established part of grant management procedures. _____ Yes _____ No

HISTORY OF PERFORMANCE

2.1 During your last two fiscal years, how frequently has your organization submitted project performance reports and fiscal reports on time?

a. Always _____
b. Reported late up to three times _____
c. Reported late four or more times _____

2.2 Have there been any significant changes in your organization in the last fiscal year related to:

a. Leadership _____ Yes _____ No
b. Significant grant/program initiatives _____ Yes _____ No
c. Structural changes _____ Yes _____ No
d. Fiscal changes _____ Yes _____ No
e. Statutory or regulatory requirements _____ Yes _____ No
f. Other (please describe): _____ Yes _____ No

_____

_____

2.3 Does your organization have performance measurements that tie to financial data? _____ Yes _____ No

COMPLIANCE

3.1 During the last two fiscal years, has your organization been out of compliance with PROGRAMMATIC or FISCAL terms and conditions of awards?

a. The organization has not been audited _____
b. No occurrences of non-compliance _____
c. One to three occurrences of non-compliance _____
d. Four or more occurrences of non-compliance

If your organization had at least one occurrence of non-compliance with programmatic terms and conditions, summarize each occurrence.

_____

3.2 Have corrective actions been implemented within the specified timeframe? _____ Yes _____ No _____ Not Applicable

3.3 Have there been conflict of interest-related findings within the last two fiscal years? If yes, explain. _____ Yes _____ No

3.4 Has your organization been subject to conditional approvals due to program issues**?** If yes, specify. _____ Yes _____ No

IMPLEMENTATION

4.1 To what extent does your organization have policies to ensure programmatic expenses are reasonable, necessary and prudent (allowable)?

a. Policies are implemented and followed _____
b. Policies are not fully implemented _____
c. The organization does not currently have these types of policies _____

4.2 To what extent does your organization have policies to ensure programmatic activities are allowable?

a. Policies are implemented and followed _____
b. Policies are not fully implemented _____
c. The organization does not currently have these types of policies _____

4.3 To what extent is your organization able to comply with all statutory requirements of this program?

a. Fully able to comply with all statutory requirements _____
b. With the following exception(s), the organization is able to comply (specify below): _____

4.4 Has the organization been out of compliance with any statutory, regulatory or other requirements of grant funding within the last two fiscal years? If yes, explain. _____ Yes _____ No

ASDOE Risk Matrix

Risk	**Risk Impact** *High/Medium/Low*	**Risk Likelihood** *High/Medium/Low*	**Risk Mitigation**	**Person Responsible**	**Correction Timeline**
Quality of Management Systems and Ability to meet Management Standards	High	Medium	ASDOE will provide the relevant technical assistance in identified areas of concern, then monitor for implementation. If necessary technical assistance will continue.		3 Months
History of Performance	Medium	High	ASDOE will provide the relevant technical assistance in identified areas of concern, then monitor for implementation. If necessary technical assistance will continue.		1 Year
Compliance	High	High	ASDOE will provide the relevant technical assistance in identified areas of concern, then monitor for implementation. If necessary technical assistance will continue.		1 Year
Implementation	High	Medium	ASDOE will provide the relevant technical assistance in identified areas of concern, then monitor for implementation. ASDOE will monitor implementation quarterly.		3 Months

American Samoa Department of Education Subrecipient Monitoring Plan

Monitoring is the regular and systematic examination of ASDOE's administration and implementation of a federal education grant, contract, or cooperative agreement. Monitoring the use of federal funds assures compliance with applicable federal requirements and ensures that all children have an equitable opportunity to obtain a high-quality education.

The monitoring process is designed to assess the degree to which program requirements are being fulfilled. This is completed in two stages: pre-award and post-award. Pre-award process consists of determining eligibility, identifying the Federal grant award information, and applicable compliance requirements. Post-award process ensures an opportunity for ASDOE to provide technical assistance and guidance to Grantee's to strengthen their program administration, improve the quality of programs, and projects being implemented. Additionally, this process meets the requirement that the Grantee permits ASDOE and auditors' access to records and financial statements as required. Additionally, ASDOE must:

- Verify the appropriate terms and conditions concerning closeout of the award.

- Evaluate each Grantee's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring may include consideration of such factors as:

    1. The Grantee's prior experience with the same or similar subawards.
    2. A risk-based approach is used on all Federal programs. This risk-based approach must include consideration of current and prior audit experience, oversight by Federal agencies and pass-through entities, and the inherent risk of the Federal program.
    3. The Grantee has new personnel or new or substantially changed.
    4. The monitoring of the activities as necessary to ensure that the award is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the award; and that award performance goals are achieved.

- ASDOE's monitoring of the Grantee must include:

    1. Reviewing financial and programmatic reports required by Grantee.
    2. Ensuring that the Grantee takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the Grantee by ASDOE detected through

audits, on-site reviews, and other means.

- Depending upon ASDOE's assessment of risk posed by the Grantee the following actions may be useful to ensure proper accountability and compliance with program requirements and achievement of performance goals:

    1. Providing Grantee with training and technical assistance on program-related matters.
    2. Performing on-site reviews of the Grantee's program operations.
    3. Arranging for agreed-upon engagements services.
    4. Verify that Grantee expends Federal awards during the respective fiscal year or period of performance.
    5. Consider taking enforcement action against noncompliant Grantee.

ASDOE Monitoring Activities

ASDOE monitoring activities include, but are not limited to, the following actions:

(1) The ASDOE Grants Management Office personnel connect with the project leads through email or by phone to monitor their respective project implementation.

(2) The ASDOE Grants Management Office personnel send out a weekly budget status report to various project leads.

(3) The ASDOE Grants Management Office personnel and the Private Schools Coordinator follow up with the project leads' quarterly and review annual performance reports and their requisitions.

(4) The ASDOE Grants Management Office personnel and the Private Schools Coordinator conduct quarterly monitoring visits to the ASDOE divisions and offices and the private schools to assess the project implementation and the status of the procured items and equipment (See: Appendix A, Monitoring Template).

(5) The ASDOE Grants Management Office personnel review the quarterly and annual reports and conduct one-on-one meetings with the project leads to collect and analyze the data and engage in effective planning.

(6) The ASDOE Grants Management Office personnel maintain documentation of the monitoring activities in respective Grant Files. This includes site-visit monitoring reports

(signed/dated), email communications, notes from telephone conversations, evaluation reports, and other documentation.

ASDOE's Uniform Monitoring Schedule

ASDOE's Grants Management Office conducts quarterly or more frequent monitoring of Education Stabilization Funds Programs/Projects. For each monitoring visit, this monitoring template must be completed, signed, and filed in the respective Grant File and with the COVID-19 Task Force.

ASDOE's Noncompliance and Corrective Actions

Corrective actions can be imposed by the Administrator of Grants Management, Oversight, and Accountability when organizations fail to comply with the terms and conditions of federal grant programs. The purpose of the corrective action is to ensure that the organization corrects the noncompliant activity.

ASDOE may identify a sub-recipient as noncompliant because of findings in a single audit, a federal monitoring review, or because of concerns identified through other means. Once identified, the project lead will receive a letter notifying her/him that the division/school/office is complying or required to complete a corrective action. The letter describes the areas of noncompliance; the required corrective action, including any enforcement actions; and the required completion date.

ASDOE's Document Retention

Completed monitoring forms must be signed by the individual conducting monitoring of the Education Stabilization Funds and retained in ASDOE ESF grant files.

Appendix A. ASDOE Quarterly Monitoring Template

DATE	
PROJECT NAME/ID	
PROJECT LEAD	
ASDOE PROJECT MANAGER(S)	

PERFORMANCE GOAL REVIEW

Performance Goals	Achieved	Comments
	☐ Yes ☐ No	
	☐ Yes ☐ No	
	☐ Yes ☐ No	
	☐ Yes ☐ No	

PERFORMANCE MEASURES MET

Performance Measures	Achieved	Comments
	☐ Yes ☐ No	
	☐ Yes ☐ No	
	☐ Yes ☐ No	
	☐ Yes ☐ No	

PRELIMINARY EVIDENCE/RESULTS OF PROGRESS

UNEXPECTED CHALLENGES OR DELAYS

FISCAL REVIEW

Item	Current Data	Comments
Project Budget		
Total Expended to Date		
Available Funds		
Allowable Use of Funds		
Document Retention		
Inventory Tracking		

COMPLIANCE REVIEW

Activities	Compliant	Comments
	☐ Yes ☐ No	
	☐ Yes ☐ No	
	☐ Yes ☐ No	
	☐ Yes ☐ No	

SUMMARY OF RECOMMENDATIONS AND FURTHER ACTION(S) REQUIRED

SIGNATURES

Project Lead		Date:
ASDOE Project Manager		Date:
ASDOE CGA Management Coordinator		Date:

UNIFORM MONITORING SCHEDULE

ASDOE's Grants Management Office conducts quarterly or more frequent monitoring of Grant Programs/Projects. For each monitoring visit, this monitoring template must be completed, signed, and filed.

DOCUMENT RETENTION

Completed monitoring forms must be signed by the individual conducting monitoring and the Grants Coordinator and retained in ASDOE ESF grant files.

Contact: ASDOE Grants Management, Phone: 684-633-5237