

# Matching, Records Retention, Closeout, & Resources

**Module II-4**  
**Chapters II-14, II-15, & Appendices**

# What's Covered?

- Match (Non-Federal Share)
- Records Retention
- Closeout
- Appendices
  - OMB Circular requirements
  - Internet resources
  - Program terms & acronyms



# What is Match?

- Non-federal funds used to support SCSEP activities
- The funds are made available to the program through cash expenditures or cash and in-kind contributions



# Matching Requirements

- 10% match

- OAA Title V, § 502(c)(1) & (c)(2)

- Proposed 20 CFR 809

- 641.29 CFR 97.24

- State, local and Indian Tribal governments

- 29 CFR 95.23

- Non-Profits, Hospitals, Institutions of Higher Education, and Commercial Organizations



# More Requirements

- Spent on allowable activities
- In accordance with cost principles
- No administrative cost limitation
- Cannot use Federal funds and non-Federal funds used for another match



# Match Exclusions

- Costs paid by Federal funds
  - Rare exception – specific authorization in other Federal legislation
- Costs used as a match for other programs
- Costs paid by SCSEP program income
- Employer share of participant wages
- Difference between earnings and costs
  - Profit or program income



# Cash Contributions

- Additional funds or services provided & paid for by the grantee
- 3rd party cash contribution
  - To the grantee organization
- Expended by grantee or subrecipient organizations



# In-Kind Contributions

- Costs not paid for by the grantee or subrecipients
- Time
  - Volunteers or paid non-grantee staff
- Services
- Space
- Supplies
- Equipment
  - Use or the equipment itself





# Records

## ■ Source documentation to support claims

- Books of account
- Available for audit & review

## ■ Records available to support 3rd party contributions

- Verifiable from subrecipient records or
- Maintained by grantee
- Methods used to value in-kind



# Reporting Requirements

- Rolled up & reported at direct grantee level
- Grantee responsible for reporting requirements
  - Both cash & in-kind contributions



# Records Retention & Access

- 29 CFR 97.42 & 95.53
- Financial & program records
- Supporting documents
- Other records
  - Pertinent to grant
- Apply equally to grantees & subrecipients



# Length of Retention Period

- In general, 3 Years from submission of final expenditure report



# Effect of requirement

- Variances between awardee levels
  - Subrecipients may dispose of records before grantee submits closeout
  - Risk of exposure should complaint or audit issues arise
  - Mechanism to track requirements
  - Take physical custody of records



# More time provisions

- Period extended until all litigation or audits resolved
- Period not extended
  - Revisions resulting from closeout
  - If litigation, etc. resolved prior to period end
    - And financial reports revised



# Other Retention Rules

- Nonexpendable personal property
  - 3 years from date of final disposition
- Complaint records
  - 3 years from resolution of complaint
  - Maintained as a whole record system
- Indirect cost records
  - 3 years from date ICR package submitted or
  - If not submitted, normal 3 year period



# Litigation/Audit

## ■ If

- Litigation or audit begun
- Claim is instituted

## ■ Then

- Records retained until resolution or
- Regular 3 year period

## ■ Delays or failure to obtain audit

- Extend period until obtained & resolved





# Custody

- Custodian responsible for integrity of records
- Custody may be transferred
  - Joint use records
  - Records with long-term value
  - Termination of relationship
- Retention requirements follow record custody



# Record Storage

## ■ Preserve

- Integrity

- Admissibility as evidence

## ■ Microfilmed or photocopied records

## ■ Electronic media storage

## ■ Security safeguards & protections

- Tamperproof



# Access to Records

## ■ Who?

- DOL
- Comptroller General
- Grant recipient
- Director, Office of Civil Rights

## ■ What?

- Books, documents, papers, & other records



# Closeout

## ■ Requirements

- 29 CFR 97.50 & 95.71

## ■ Within 90 days of grant expiration

- Unless extended by Grant Officer

- Obligations liquidated

- Final expenditure reports submitted

## ■ Account for all property

## ■ Right to further adjustments



# Closeout

- Requirements apply to direct grantees
  - 90 day period applies to grantee
- Final grant modification
  - Changes in signatory, address, etc.
- All drawdowns made
- Refunds
  - Through PMS until non-operational
  - Subsequently, check or warrant



# Closeout Objectives

- Ensure Federal requirements are met
- Prior knowledge by all awardees of
  - What actions are required
  - What conditions must exist
- Ensure each level can fulfill responsibilities
- Post-closeout rights
- Identify (& resolve) post-closeout issues



# Closeout Process

- Keep to minimum required
  - Achieve closeout
  - Prevent problems
- Written policies & procedures
  - Settle all subgrants
  - Submit refunds
  - Reconcile all activity



# Closeout Procedures

- Establish lower level due dates
- Identify all closeout documents
- Procedures for
  - Unclaimed/uncashed checks
  - Pending & late claims
  - Refunds, rebates, & credits
  - Treatment of property
  - Bonds & bank accounts (if necessary)





# Post-Closeout Rights & Responsibilities

- 29 CFR 97 and 95
- Right to disallow costs & recover funds
  - Basis of later audit or other review
- Responsibility
  - To return all funds due
  - For record retention & access
  - For property management & disposition
  - For audit & audit resolution
- Notification that closeout has occurred



# End-of-Grant Issues

- Regular Single Audit covering Grant Period
- Final Indirect Cost Rate (if claimed) covering Grant Period



# Indirect Costs

(If claimed)

- If provisional rate
  - Grantee must request final rate
  - Submit proposal to cognizant agency within 6 months
- If final rate lower, must refund excess
- If final rate higher, may not be sufficient funds



# Internet Resources

- Appendix C
- Required Partners
- Additional Partners
- Regulations & Circulars
- Other Financial Management Resources



# Appendix D

- Glossary of terms
  - Financial
  - Programmatic if impact financial requirements
- List of acronyms
  - From both Part I and Part II
- Apply to all ETA-funded programs



# Appendix D

## Sources

- Directly from WIA Legislation or WIA final regulations
- Other Federal Sources
  - CMIA
  - GAAP
- OMB Circulars & related regulations
  - A-87, A-122, etc.
  - 29 CFR Parts 95 & 97



# More on Appendix D

- Similar definitions—named differently
  - Grant & award
  - Grantee & recipient
- Clarifying information is *italicized*
- Terms cross-referenced if more than one source



# Some Terms to Remember

- Acquisition cost
- Accrued expenditures
- Awarding agency
- Cost sharing or matching
- Equipment





# More Terms

- Grant
- Internal control
- Leasehold improvements
- One-Stop partner
- Outlays (expenditures)



# And a few more.....

- Program income
- Questioned cost
- Subrecipient
- Supplies
- Workforce investment activities



# Our Jobs

