* **Financial Accounting Practices:** Each subgrantee must prepare a response to all seven (7) of the following questions. PGR will review the subgrantee’s responses to assist in evaluating the adequacy of the subgrantee’s financial management system and to identify areas of need for training and technical assistance. The attachment must be no more than two (2) pages.

1. Will all funds awarded under this program be maintained in a manner that they will be accounted for separately and distinctly from other sources of revenue/funding? Please provide a brief description of the organization’s policies and procedures that ensure funds will be tracked appropriately.
2. Does the subgrantee have written accounting policies and procedures? How often are these policies and procedures updated? Please provide a brief list of the topics covered in the organization’s policies and procedures. PGR may request a copy for review during the application/award process or as part of the subgrant monitoring process.
3. Is the subgrantee’s financial management system able to track actual expenditures and outlays with budgeted amounts for each grant or subgrant? Please provide a brief summary of the organization’s process for tracking expenditures.
4. Does the subgrantee have procedures in place for minimizing the time between transfer of funds from ISP and disbursement for project activities? Please provide a short summary of the organization’s policy for requesting payments for grant awards.
5. Does the subgrantee have effective internal controls in place to adequately safeguard grant assets and to ensure that they are used solely for authorized purposes? Please provide a brief description.
6. Does the subgrantee have a documented records retention policy? If so, briefly describe the policy.
7. Is the individual primarily responsible for fiscal and administrative oversight of grant awards familiar with the applicable grants management rules, principles, and regulations including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, (2 CFR Part 200)? Please provide a short list of the individual’s qualifications/experience. If the individual is not familiar with the applicable rules and regulations, the subgrantee must contact PGR immediately after the organization is notified of its award to coordinate training.
8. \*New\* Does the subgrantee or any of its employees have any potential personal or organizational conflicts of interest related to the possible receipt of OVW award funds? Applicants are required to disclose in writing any potential conflicts of interest to their awarding agency. See 2 C.F.R. § 200.112 and Chapter 3.20, Grant Fraud, Waste and Abuse, of the DOJ Financial Guide for additional information.
9. \*New\* Does the subgrantee currently require employees to maintain time distribution records that accurately reflect the work performed on specific activities or cost objectives in order to support the distribution of employees’ salaries among subawards or other activities (2 C.F.R. § 200.430)? Budget estimates do not qualify as support for charges to subawards. Provide a brief description of the organization’s established timekeeping policies and procedures.