# Financial Accounting Practices

Each applicant must prepare a response to all ten (10) of the following questions. PGR will review the subgrantee’s responses to assist in evaluating the adequacy of the applicant’s financial management system and to identify areas of need for training and technical assistance. Include each numbered question with responses underneath and attach as a separate document under the “Attachment” section on the application in GMS. The attachment must be no more than four (4) 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? Provide a brief description of the applicant’s policies and procedures that ensure funds will be tracked appropriately.
2. Does the applicant have written accounting policies and procedures? How often are these policies and procedures updated? Are the same policies and procedures used for accounting and expending federal funds as non-federal funds?
3. Provide a brief list of the topics covered in the applicant’s policies and procedures. PGR may request a copy for review during the application/award process or as part of the grant monitoring process.
4. Is the applicant’s financial management system able to track actual expenditures and outlays with budgeted amounts for each grant? Provide a brief summary of the organization’s process for tracking expenditures, including tracking budgeted versus actual amounts.
5. Does the applicant have effective internal controls in place to ensure that federal funds are used solely for authorized purposes? Provide a brief description of the applicant’s internal controls that will provide reasonable assurance that the award funds will be managed properly.
6. Does the applicant have a documented records retention policy? If so, briefly describe the policy and confirm that the policy complies with federal regulations. Subgrantees are required to keep their grant files/documentation for three (3) years from the date ISP submits the final federal expense report (FFR) or until resolution of all outstanding audits, whichever is longer. The Subgrant Records Retention Schedule is located on [PGR’s website](https://isp.idaho.gov/pgr/) from the “[Resources](https://isp.idaho.gov/pgr/resources/)” link.
7. Does the applicant or any of its employees have any potential personal or organizational conflicts of interest related to the possible receipt of DOJ award funds? Applicants are required to disclose in writing any potential conflicts of interest to PGR. See 2 C.F.R. 200.112 and Chapter 3.20, Grant Fraud, Waste and Abuse, of the DOJ Financial Guide for additional information.
8. 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 C.F.R. Part 200)? Provide a short list of the individual’s qualifications/experience.
9. If applicable, does the applicant have policies and procedures in place to manage subawards and monitor activities of subrecipients as necessary to ensure that subawards are used for authorized purposes, in compliance with laws, regulation, and terms and conditions of the award; and that established subaward performance goals are achieved ([2 C.F.R. §§ 200.330-332](https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-sec200-330))? Please provide a brief description of the organization’s policies and procedures on subrecipient management and monitoring, if applicable.
10. If applicable, does the applicant 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 federal awards or other activities (2 C.F.R. 200.430)? Budget estimates do not qualify as support for charges to federal awards. Provide a brief description of the organization’s established timekeeping policies and procedures.