



Building an Administrative Record

A list of questions to guide grantees in creating and building an Administrative Record. While program reporting to EPA is primarily a way to demonstrate compliance, an Administrative Record is a historical record of events which is primarily focused on demonstrating harms to grantees or obstacles to compliance in their grant funded projects. Secondly, it can document ways in which grantees are staying compliant.

AS A GRANTEE:

Have the following resources been available? Document ways in which you have sought and received guidance for these steps in the project.

1. Regular communication and guidance from your Project Officer
2. Communication and guidance from your Grants Specialist
3. Communication and guidance from your Regional Quality Assurance Manager (QAM)
4. Guidance and templates on pre-award negotiation process including workplans and budgets/budget narratives
5. Guidance on grant agreement execution process once workplan and budget have been approved by EPA
6. Understanding the terms and conditions of your EPA grant agreement including general and program specific terms and conditions, and how they apply to your project
7. Guidance on how to set up ASAP account, perform draw downs, and records needed to support draw down amounts, recommended frequency of draw downs, how to return funds in ASAP
8. Guidance on building administrative capacity in learning about grant administration, budgeting, invoicing, recordkeeping for audits
9. Guidance on time tracking systems for staff time charged to EPA grants
10. Guidance on project partner roles and reflecting these in your workplans and budgets and contracting
11. Guidance and templates on non-profit certification/Form 6600-01
12. Guidance and templates on revising organizational policies to have non-profit certification approved by EPA
13. Overall understanding of Quality Program requirements and triggers
14. Guidance and templates on Quality Management Plan
15. Guidance and templates on Quality Assurance Project Plan
16. Understanding of recipient responsibilities including time tracking, financial management, federal procurement, and subrecipient monitoring



17. Guidance and templates on different types of federal procurement
18. Guidance and templates on RFPs
19. Guidance and templates on subrecipient contracts
20. Guidance and templates on requirements for construction contracts and flow down language
21. Guidance and templates on program reporting
22. Guidance and templates on financial reporting
23. How to track project outputs and outcomes through regular program reporting
24. Guidance on sequencing of project activities to stay on schedule and what requirements may require time to obtain EPA approval
25. Guidance on budget reallocations, no-cost extensions, and ability to make timely progress while these are being processed by EPA

AS A GRANTEE:

- How have you handled the hurdles below?
- How have they impacted your organization or ability to stay in compliance? This includes staff layoffs, inability to hire staff, incur expenses, and financial instability.
- What actions have you taken to address these issues? This includes seeking guidance and resources from other agencies, grantees, EPA, or other actions.

Include dates and specific activities which have been delayed or not occurred, organizational impacts, and actions to address these issues.

1. ASAP pause
2. ASAP freeze
3. Lack of PO communication
4. Lack of Grants Specialist communication
5. Lack of Regional QAM communication
6. Lack of EPA feedback
7. Lack of EPA approval
8. QMP or QAPP approval/delays
9. EPA stop work order
10. EPA contract termination
11. Amendment or no-cost extension



AS A GRANTEE:

- Which of these areas of non-compliance have occurred on your project?
- How have you tried to address these?
- What resources were made available for your organization/project to get back into compliance?

Include dates, details of specific incidents, how non-compliance was discovered, guidance received, and corrective actions.

1. Budget reallocation/amendment
2. Behind schedule
3. Compliance with federal procurement requirements
4. Compliance with BABA
5. Compliance with DBRA
6. Subrecipient change
7. Contractor change
8. Work delayed
9. Contractor unable to complete work on time or on budget
10. QMP compliance
11. QAPP compliance
12. ASAP drawdown issue
13. Misclassification of staff, contractors or subrecipients
14. Misclassification of participant support costs
15. Insufficient documentation of fringe benefits or indirect overhead rates