



TO: State Library Agency Chiefs

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DATE: January 26, 2015

SUBJECT: 2015 Grant Award Guidance

NEW OR REVISED SECTIONS FOR FY 2015

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PLEASE NOTE: The recent Office of Management and Budget (OMB) final guidance on Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Grant Reform) has streamlined and consolidated grant requirements. The Grant Reform can be found at 2 CFR Part 200 and the corresponding IMLS-specific grant regulations at 2 CFR Part 3187. Please note that IMLS regulations that were found at 45 CFR Parts 1180 and 1183 have been removed. The Grant Reform (which includes the new IMLS regulations) is effective for all awards made after December 26, 2014. Any subawards made from a post-December 26, 2014 award are to follow the new regulations; and any subawards made from a pre-December 26, 2014 award will continue to follow the regulations that were in effect at the time the pre-December 26, 2014 award was made.

In order to help our grantees become familiar with the Grant Reform, we recently held a webinar, a recording of which is available at <http://stateprograms.imls.gov/webinars.htm> (username: lsta / password: statepgms55). The Council on Financial Assistance Reform (COFAR) website (<https://cfo.gov/cofar/>) includes links to webinars on the Grant Reform and helpful crosswalks and FAQs.

In addition, IMLS has revised our Administrative Costs (4%) Guidance (see attached). Please note that facilities-related costs incurred at the State level, if paid for with LSTA funds, are subject to the 4% cap. Also, please note that the 4% administrative cost restriction is not applicable to subrecipients. The SLAA is responsible for establishing the indirect cost rate for its subrecipients in accordance with the Grant Reform at 2 CFR Part 200.

WHAT ARE MY LEGAL RESPONSIBILITIES?

Please read this document very carefully. Failure to comply with this guidance and the relevant law may result in the withholding of grant funds, the suspension or termination of the grant, and/or the return of grant funds. It also may jeopardize any pending or future applications with IMLS.

In accepting the Library Services and Technology Act (LSTA) grant from the Institute of Museum and Library Services (IMLS), the grantee assumes the legal responsibility of administering the grant in accordance with the LSTA statutory and regulatory requirements. The grantee must maintain documentation which is subject to audit of all actions/expenditures affecting the grant. (See "What Records Must We Keep?," p. 5)

This guidance memo highlights some of the most significant elements that you need to know. Additional information and forms to administer this program can currently be found at: <http://stateprograms.ims.gov/> (username: lsta / password: statepgms55)

WHAT IS INCLUDED IN MY GRANT AWARD NOTIFICATION?

The **Grant Award Notification** provides the amount of your allotment, the dates of the grant period, the Catalog of Federal Domestic Assistance (CFDA) number, and the assigned grant award number/Federal Award Identification Number (FAIN). Your allotment is calculated by adding the minimum base allotment plus your state's portion based on state population. Data used in the state allotment table are from the Bureau of Census and are the most current published population estimates available at the time of the grant award notification.

WHEN CAN WE USE THE FUNDS?

Once issued, the Grant Award Notification identifies the two-year period within which the Grantee must carry out activities and charge costs to the award. The grant period is aligned with the beginning of the federal fiscal year. The two-year period for this LSTA grant began October 1, 2014, and ends September 30, 2016. **All project activities must be completed and all funds obligated by September 30, 2016. All grant funds must be expended/liquidated and drawn down by December 30, 2016. If the State cannot meet this requirement with respect to deadlines and obligations, please contact your Program Officer as soon as possible for additional guidance.**

HOW DO WE REQUEST FUNDS?

Payments of the LSTA allotment will be made on an advance or reimbursement basis according to the following conditions:

1. To receive grant funds, grantees should email a **PDF copy of the Request for Advance or Reimbursement SF-270 to the IMLS Grants Administration Office at grantsadmin@ims.gov**. Please do not mail the original SF-270 or fax a copy. If you cannot email the document in PDF format to IMLS, please contact grantsadmin@ims.gov for instructions. Grantees may request payment whenever grant funds are needed. Requests for advance payment shall be limited to the recipient's immediate cash needs. Federal funds advanced to the recipient should be fully disbursed (example: checks written, signed, and issued to the payees) within 30 days from the date the recipient receives the advance funds from IMLS. Please note section 8 of SF-270 must contain dates that fall within the two-year allotment grant period. For example, in the FY 2015 allotment grant, eligible dates for section 8 are between October 1, 2014 and September 30, 2016. Payments will normally be made by the Federal Government within ten (10) working days of receipt by IMLS of the grantee's request. If you do not receive your funds within that period, or if you have other questions concerning payment requests submitted, you may contact the IMLS Office of Grants Administration at grantsadmin@ims.gov or (202) 653-4737. **List only one grant per SF-270 form.** The form is at: <http://www.ims.gov/assets/1/AssetManager/sf270.pdf>
2. **Grantees that are paid in advance are required to report on the status of funds received from IMLS within 30 days after an advance is received using either Section 11 or Section 12 of the Request for Advance or Reimbursement Form (SF-270).** The SF-270 form must be submitted for reporting, even if no additional funds are being requested. The next request for payment will not be approved until the outstanding advance has been fully liquidated by the recipient. Incomplete SF-270 forms may result in delayed payments.

3. Grant payments will be made by direct deposit to your designated bank account through the Department of Treasury payment system. This system is the only way to receive your grant money. Each grantee is allowed only one account in which the Department of Treasury will deposit LSTA State grant funds. **If you change your account information, you must update this information on SAM.gov (please see “What Forms are Required?” below).**
4. Regarding the **Cash Management Improvement Act of 1990 (CMIA)**: While IMLS grants and awards generally do not fall under the CMIA requirement, State governments may enter into an agreement with the U.S. Treasury Department to adhere to CMIA regulations and require all its departments to comply.

WHAT CAN WE PURCHASE?

1. Grant funds may be expended for allowable costs that are consistent with your award, 20 U.S.C. Chapter 72 ,Subchapter II (Library Services and Technology, see 20 U.S.C. sections 9121-9141), the Grant Reform (2 CFR Parts 200 and 3187), and your approved LSTA Five-Year State Plan.
2. Written approval from your Program Officer is required prior to the purchase of equipment costing \$5,000 or more per unit. Requests must detail the proposed expenditure and reference the relevant goal in your LSTA Five-Year State Plan.
3. Grant funds must be expended for the goals and objectives identified in your LSTA Five-Year State Plan that was submitted and approved by IMLS. **Grant funds cannot be expended for any changes in the program goals without prior IMLS approval.**

CAN WE PAY SLAA STAFF WITH GRANT FUNDS?

State Library Administrative Agency (SLAA) staff may be paid with LSTA funds in proportion to the percentage that they are involved with activities that meet the LSTA priorities included in the State’s Five-Year Plan. Documentation is required for those personnel costs charged to LSTA grants as well as state and local personnel costs being used for Match.

HOW DO WE ACKNOWLEDGE IMLS?

You and your subgrantees must acknowledge IMLS in all related publications and activities supported with your grant money. An example acknowledgement would read: “This program was funded in part with a federal grant from the Institute of Museum and Library Services .” A kit with suggestions and materials to help you and your subgrantees publicize grant activities is available at <http://www.ims.gov/recipients/grantee.aspx>. If you have any questions or need assistance, you may contact staff in the Office of Communications and Government Affairs at (202) 653-4757.

Please send any press coverage you or any of your subgrantees may receive about this award to your Program Officer.

WHAT FORMS ARE REQUIRED?

PLEASE NOTE: IMLS will accept signed PDF copies of the forms listed below and no longer requires originals to be mailed.

Documents Submitted Annually:

Return these documents within ten (10) business days from date of receipt of this guidance

[Assurances and Certifications for 2015 Grant Award](#)

[Information Update](#)

The SLAA must submit a revised Information Update form whenever there are changes in any key staff category.

Documents to Submit if You Have a New Authorized Certifying Official:

PLEASE NOTE: IMLS no longer requires submission of the forms listed below for acting/interim authorized certifying officials (except for the Information Update form). However, such acting/interim authorized certifying must be acting on behalf of the State with the same capacity and title as the official who was formally named as the authorized certifying official; if this is not the case, a new State Legal Officer's Certification must be submitted.

Return these documents within ten (10) business days from date of receipt of this guidance.

[State Legal Officer's Certification](#) (this certification should have the same or an earlier date than all other certifications and assurances)

[Assurances and Certifications for 2015 Grant Award](#)

[Assurances – Non-Construction Programs](#) (SF-424B)

[Internet Safety Certification Form](#) (if applicable)

[Information Update](#)

The SLAA must submit a revised Information Update form whenever there are changes in any key staff category.

PLEASE NOTE: IMLS no longer requires submission of ACH forms (this information is now included in your institution's SAM.gov registration) or Subawards and Executive Compensation forms.

WHAT IF WE WANT TO CHANGE OUR LSTA FIVE-YEAR STATE PLAN?

If an SLAA makes a substantive revision to its State Plan, then the SLAA must, pursuant to 20 U.S.C. §9134(a)(3), submit to IMLS an amendment to the State Plan. A change in any or all of the goals in the State Plan is considered a substantive revision. A change in your program activities does not constitute a substantive revision to your State Plan. Should the State Plan need to be revised, the SLAA shall submit to its IMLS Program Officer an amendment containing such revision no later than April 1 (e.g., April 1, 2015) of the fiscal year preceding the fiscal year (e.g., FY 2016) for which the amendment will be effective. The revision cannot be implemented until the grantee receives written approval from IMLS. Implementation of any approved change(s) cannot occur until the beginning of the fiscal year for which the amendment will be effective (e.g., October 1, 2015). Please contact your Program Officer prior to submission of the revision.

WHAT FORMS ARE REQUIRED FOR SUBRECIPIENTS?

If the SLAA awards subawards, the subrecipients must comply with all applicable statutes and regulations included in the following certifications and as may be otherwise required by law:

1. Civil Rights - Nondiscrimination
2. Debarment and Suspension
3. Lobbying
4. Internet Safety Certification (if applicable to the grant)
5. Trafficking in Persons

Subrecipients must also acknowledge IMLS. (See “How Do We Acknowledge IMLS?,” p. 3)

WHAT FINANCIAL MANAGEMENT STANDARDS MUST WE FOLLOW?

As a grantee, you must expend and account for grant funds in accordance with your State laws and procedures for expending and accounting for the State’s own funds. In addition, your financial management systems must be sufficient to permit preparation of required reports and the tracing of funds to show that such funds have been used according to Federal statutes, regulations, and the terms and conditions of the Federal award. (see Grant Reform, including but not limited to 2 CFR §200.302).

WHAT RECORDS MUST WE KEEP?

Grantees and subgrantees must maintain records which adequately support that the IMLS grant funds have been properly used (see Grant Reform, including but not limited to 2 CFR §200.302). These requirements apply to all expenditures associated with the LSTA Grants to States Program, including projects (96%), administrative costs (4% cap), Match, and Maintenance of Effort. Generally, records must be kept for three years from the date the final expenditure report is submitted, or longer in certain circumstances. See Grant Reform, including but not limited to 2 CFR §200.333-337 and records retention schedules for LSTA & LSCA materials:

[Records Retention Schedule for Grants to States Documents](#)

WHAT OTHER REPORTING IS REQUIRED?

SAM.gov Registration

As a grantee, you must maintain the currency of your information (which includes financial and banking information) in the System for Award Management (<http://sam.gov>). This requires that you review and update the information at least annually after the initial registration, and more frequently if required by changes in your information or other guidance.

PLEASE NOTE: Your SAM registration must be active at the time IMLS issues your grant award.

FFATA

The Federal Funding Accountability and Transparency Act (FFATA) requires that information on federal awards (grants and contracts) be available to the public by a single searchable website, www.USASpending.gov. FFATA also requires grant award recipients (prime awardees) to report any subgrant greater than or equal to \$25,000.00 by the end of the month following the month in which the subgrant is awarded. Within the State Grant Program, SLAAs are the prime awardees. Subgrant information input into the FFATA Subaward Reporting System (FSRS) is automatically linked to www.USASpending.gov. For additional information, please consult the [Grants to States FFATA Guidance](#) as well as the FSRS website: www.fsr.gov.

In addition, you must report total compensation for each of your five most highly compensated executives for the preceding completed fiscal year, **if the following criteria are true for your organization** —

- More than 80 percent of annual gross revenues are from the federal government, and those revenues are greater than \$25M annually; and

- Compensation information is not already available through reporting to the Securities and Exchange Commission (SEC).

PLEASE NOTE: Because you are to submit relevant information electronically to the government-wide site (www.fsrs.gov), IMLS no longer requires submission of the Subawards and Executive Compensation form.

Quarterly Grant Accrual Reports

Grantees must report grant accruals on a quarterly basis to IMLS. Each quarter's accrual must represent the total expenses for active grant awards that a grantee has incurred during the grant period but has not yet submitted to IMLS for reimbursement. Because two Federal fiscal year State Grants typically overlap in the grant periods, quarterly accrual information will cover two separate active grants. Submit this information no later than four business days after the last day of the quarter. See the [Grant Cycle Calendar for State Grants](#) for due dates. At the end of each quarter, please send an email with the grant number(s) and total grant accrual amount(s) for the current award year(s) in the body of the email to LSTA-QRTAccrual@imls.gov. For additional information, please see the document, [Quarterly Grant Accrual Report Guidance](#).

Interim and Final Reports and Requirements

Please note: States must submit an Interim Financial Report no later than December 30, 2015. The form will be available as part of the new SPR.

States must submit the following to close out the grant:

1. State Program Report (online)
2. Financial Status Report (online, part of the new SPR)
3. Final request for payment (SF-270)

The State Program Report (SPR) and Financial Status Report are due no later than December 30, 2016. This web-based online report addresses the requirements of the LSTA and the Government Performance and Results Act (GPRA).

If you have questions about your grant award or the enclosed information, contact your assigned Program Officer.

All forms of communication should reference the Grant Award number.

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Issued: 1-26-2015