Appendix D – Shortlist of Subaward Expectations for the Mississippi River Basin Historically Underserved Farmer Subaward Program

Below is a summary of the major expectations for receiving and implementing a subaward under the Mississippi River Basin Underserved Farmer to Farmer program. This list is not meant to replace the terms and conditions that will be included in award documents. Instead, this list is meant to be a brief and simple summary to aid applicants in identifying how many new policies and procedures may be needed and how much staff time to allocate to the proposed project. Some of these policies and procedures may be required before receiving any funds, while others can be developed during your subaward. Wallace Center is available to support prospective subawardees in developing these policies and procedures, including through templates, trainings, and individual support as requested.

- **Legal registration** of organization maintained, and Unique Entity Identifier (UEI) assigned. Must not be suspended, debarred, or otherwise ineligible from receiving federal funding.

- **Financial management** and internal controls, including:
  - regular (e.g. monthly) invoicing and submission of receipts for program expenses to Wallace Center
  - regular (e.g. monthly) submission and reconciliation of advance requests to Wallace Center
  - policy that accounting functions are separate from purchasing (e.g. different staff members perform different procurement roles)
  - the capacity to open and maintain an interest-bearing bank account
  - appropriately safeguarding unused checks and petty cash
  - appropriate controls established on account disbursements
  - procedures to document disbursements for grant activities
  - monthly reconciliation of organizational bank accounts
  - documented accounting policies and procedures (including a written chart of accounts with descriptions of each account)
  - the ability to produce financial statements by funding source
  - adequate documentation to justify each receipt or disbursement, including proof of payment
  - monitoring of expenditures regularly against budgets to anticipate or prevent cost overruns
  - The following are encouraged:
    - dedicated accountant support
    - use of a double entry accounting system
    - use of an automated accounting system

- **Written procurement policies** or manual, including:
  - policies for soliciting quotes competitively
  - process for selecting vendors based on value or lowest price
  - documentation of vendor selection in writing
  - use of written contracts to make purchases for goods over $500 or services (e.g., purchase orders or consultant agreements)
• Policies for making good faith efforts to purchase goods and services from disadvantaged business enterprises such as minority-owned businesses or women-owned businesses
• Tracking and annual reporting of purchases from minority-owned businesses or women-owned businesses

• Plans or policies for **property management**, including:
  o Maintenance of inventory lists of property and equipment
  o Adequate insurance for all property
  o Securing of property to prevent loss or damage
  o Maintenance of equipment and facilities in good working order

• Written **personnel/human resources policies**, including:
  o Policies that prohibit discrimination in the provision of services or benefits on the basis of race, color, national origin, sex, disability, or age
  o Documented duties of each employee or role
  o Documentation of fringe benefits
  o Documentation that salaries are reasonable and comparable to similar work for other projects within the organization
  o Use of verifiable daily records of hours worked by activity or funding source (e.g., timesheets)

• Written **travel policies**, if relevant, including:
  o Policy for when travel requires approval
  o Use of established per diem rates
  o Use and documentation of travel expense reports

• Appropriate **records management**, including:
  o A system for storing human resources, purchasing, and accounting records
  o Keeping records secure and access limited to only those authorized by their job function
  o A backup system or recovery plan in case records are damaged or compromised
  o Storage of documents for at least 3 years after all financial obligations are complete
  o Timely submission of requested records

• Regular **programmatic reporting**, including:
  o Participation in twice yearly cross-subawardee meetings and additional meetings as requested.
  o Submission of quarterly programmatic report that includes work accomplished in previous quarter, data for key metrics like number of farmers and acres reached in previous quarter, and financial reporting for program expenses in previous quarter
  o Data tracking systems that track and report farmers reached, acres with new practices or restoration activities (including location, baseline, and practice or habitat type), and expected lifespan of practice.
  o Subawardees are not required to do additional environmental data collection or analysis and will not be assessed on whether those activities are included. However, subawardees are encouraged to include these activities to the extent they will be helpful, e.g., if inclusion of these activities might expand the organizations’s funding sources, build relationships with new partners such as researchers, or help tell the conservation success stories of the organization or participating farmers. If these
activities are planned, please note that subawardees may need to develop quality assurance project plans and/or quality management plans, which the Wallace Center can support.