

Reporting of Sub award Information

The Government Accountability Office (GAO) reviewed our anti-terrorism procedures in 2008.

- USAID West Bank Gaza, Prime Awardees, and Sub awardees spent much of the past few months supplying data.

GAO Report – May 2009

- Conclusion: “USAID Strengthened Its Antiterrorism Policies and Procedures and Complied with Them in Making New Prime Awards, but Has Weaknesses in Compliance at the Sub award Level.”

GAO Recommendations:

- **Recommendation:** To strengthen compliance with USAID policies and procedures at the subaward level, the Administrator of USAID should take action to help ensure that the mandatory clauses are included within each subaward contract or agreement or, when not included within the contract or agreement there is sufficient evidence to clearly establish that the subawardee has agreed to comply with mandatory clauses at the time the award is made.

Recommendation: To strengthen compliance with USAID policies and procedures at the subaward level, the Administrator of USAID should take action to help ensure that prime awardees provide sufficiently detailed information in their monthly subaward reports to clearly demonstrate that mandatory clauses were included in the subaward at the time the award was made.

Comments: When we confirm what actions the agency has taken in response to this recommendation, we will provide updated information.

USAID WBG Response:

- To implement our recommendations USAID stated that it will issue new instructions to the mission's prime awardees to help ensure that contracts and agreements contain clear and specific references to attached clauses and clauses likewise contain clear and specific references to the base agreement.
- USAID also plans to instruct prime awardees to explain any inconsistencies in their monthly subaward reports.
- Additionally, USAID will require prime awardees to certify that their monthly subaward reports are both accurate and complete.

Mandatory Clauses

- The following special provisions should be included in **all** sub awards
 - **Prohibition against Support for Terrorism**
 - **Restriction on Facility Names**
 - **Prohibition against Cash Assistance to the Palestinian Authority**

How to ensure that contracts and agreements contain clear and specific references to the Mandatory Clauses?

Method I

The mandatory clauses: (1) Prohibition Against Support for Terrorism; (2) Prohibition Against Cash Assistance to the Palestinian Authority; and (3) Restriction on Facilities Names be included in the body of the sub award above the signature line.

Method II

The mandatory clauses are included in an attachment to the award, there needs to be a reference to the attachment in the body of the award (e.g. "This agreement includes Attachment A which forms an integral part of the agreement.") Likewise, the attachment also needs to reference the base award (e.g. "This attachment forms part of Purchase Order/Contract XXXX."). This needs to be typed, not hand written.

The Subaward Report

- The subaward report identifies all subawards executed during a specific month by a USAID implementing partner including written contracts, oral contracts, cash grants, in kind assistance, cost amendments and time extensions.

The Subaward Report

- On the 5th of each month, the monthly sub award report is submitted to the Program Support Unit (PSU), to wbgsubdocs@usaid.gov for review.
- On a monthly basis, first tier new sub awards, US and Non-US, are entered to the corresponding worksheet supplied by USAID West Bank & Gaza. The excel sheet will create a cumulative list of sub awards.

The Sub award Sheet

The sub award sheet includes the following;

- Chief of Party Certification
- Number
- Name of Organization/Individual
- Address of Organization
- US/Non US
- Amount of Sub award
- Type of Sub award
 - ✓ Written Contract
 - ✓ Oral Contract
 - ✓ Cash Grant
 - ✓ In - Kind Grant
 - ✓ Cost Amendment
 - ✓ Time Extension
 - ✓ Cost Amendment and Time Extension
- Goods or Services acquired for Program Use/Prime's Own Use
- Purpose
- Period of Performance:
- Special Provisions

Chief of Party Certification

- A new feature added to the subaward report, a certification by the Chief of Party, the senior officer in country, that the report is complete and accurate to the best of his or her knowledge. This is done by printing his/her name, executing a signature and dating the line at the top of the report “Chief of Party Certification”. That page can be scanned as a pdf copy and sent electronically with the report.

USAID/WBG											
Identification of Sub awardees - Subcontractors/Subgrantees											
Report Date :		Chief of Party Certification: The information contained in this report is complete and accurate to the best of my knowledge. USAID Program COP									
Direct Sub-Awards (Sub-Grants/Sub-Contract) to which the prime is a party		Signature									
Name of Prime Contractor/Grantee/Recipient:											
Contract/Grant/Cooperative Agreement Number:											

Number

- This is the column to number sub-awards sequentially beginning with subawards and amendments made July 1, 2012 and reported on August 5, 2012.

Name of Organization/Individual signing Subaward

- This column is for the name of the subawardee (organization or individual) as it appears in the subaward. If an individual, please include the full name (four-part name if available).

Address of Organization/Firm

US/Non US Sub-Awardee

- This column has a “drop-down box” to choose whether the sub-awardee is a U.S. or non-U.S. organization or individual.

Amount of Subaward

- In USD (exchange rate on start date of the subaward)

Type of Sub award

- Written Contract

- A written contract or any instrument that acts as a contract; a purchase order, consulting agreement, letter agreement, lease agreement, memorandum of understanding.

- Oral Contract

- This includes retail purchases where there is no written contract
- **If for prime's own use and no written contract/purchase order, leave out**

- Grant - Cash

- Grant - In Kind

Type of Subaward
(if retail purchase with no written purchase order or contract, choose "oral contract")

Written Contract
Oral Contract
Cash Grant
In Kind Grant
Time Extension
Cost Amendment
Cost Amendment & Time Exten.

Goods or Services acquired for prime/ program use (If prime's own use and no written contract/purchase order, leave out)

Prime's Own Use
Program Use

Type of Sub award

- Cost Amendments

- An amendment to an existing sub award which increases or decreases cost.

<i>Name of Organization Signing Sub award</i>	<i>Amount of Sub award</i>	<i>Cumulative Amount in Case of Cost Amendment</i>	<i>Purpose</i>	<i>Start Date/Date of Amendment</i>	<i>End Date</i>
ABC	\$5,000	$\$5,000 + \$10,000$ = \$15,000 (amount of the amendment + original amount = new total cumulative)	Please make a reference to the original sub award	Please enter the date of the amendment	Please enter end date

Type of Subaward

- Time Extensions
 - An amendment to an existing sub award which extends the period.

<i>Name of Organization Signing Sub award</i>	<i>Type of Award</i>	<i>Amount of Sub award</i>	<i>Cumulative Amount in Case of Cost Amendment</i>	<i>Purpose</i>	<i>Start Date/Date of Amendment</i>	<i>End Date</i>
ABC	Time Extension	\$5,000 (please enter original amount of subaward)	—	Please make a reference to the original subaward	Please enter the date of the extension	Please enter NEW end date

Type of Sub award

- Cost Amendment and Time Extension

<i>Name of Organization Signing Sub award</i>	<i>Type of Award</i>	<i>Amount of Sub award</i>	<i>Cumulative Amount in Case of Cost Amendment</i>	<i>Purpose</i>	<i>Start Date/Date of Amendment</i>	<i>End Date</i>
ABC	Time Extension & Cost Amendment	\$5,000	\$5,000 + \$10,000 = \$15,000 (amount of the amendment + original amount= new total cumulative)	Please make a reference to the original sub award	Please enter the date of the amendment	Please enter NEW end date

How to report a blanket agreement with orders placed orally?

Example:

\$2500 on July 15th

\$2500 on July 23rd

Cumulative amount $\$2500 + \$2500 = \$5000$

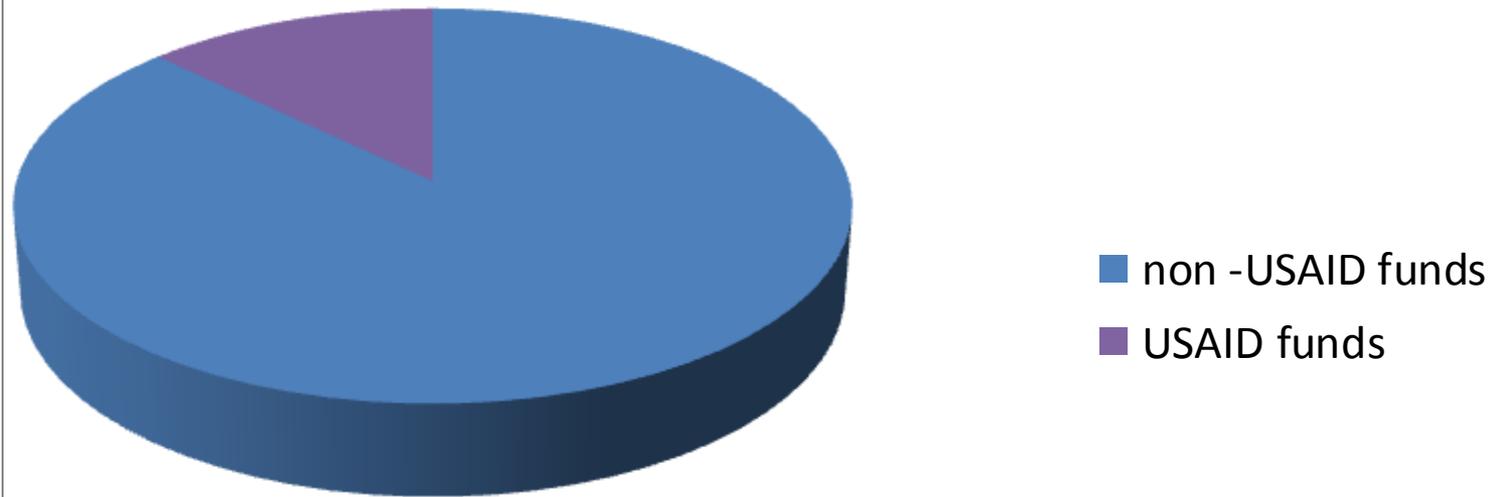
Date of Last Order (Start Date) = July 23rd

How to report a blanket agreement with orders placed orally?

Cumulative Amount	Amount of Sub Award	Start Date	End Date
0	0	7/1/2012	12/31/2012
\$5,000	\$5,000	7/23/2012	12/31/2012
\$12,000	\$7,000	8/18/2012	12/31/2012

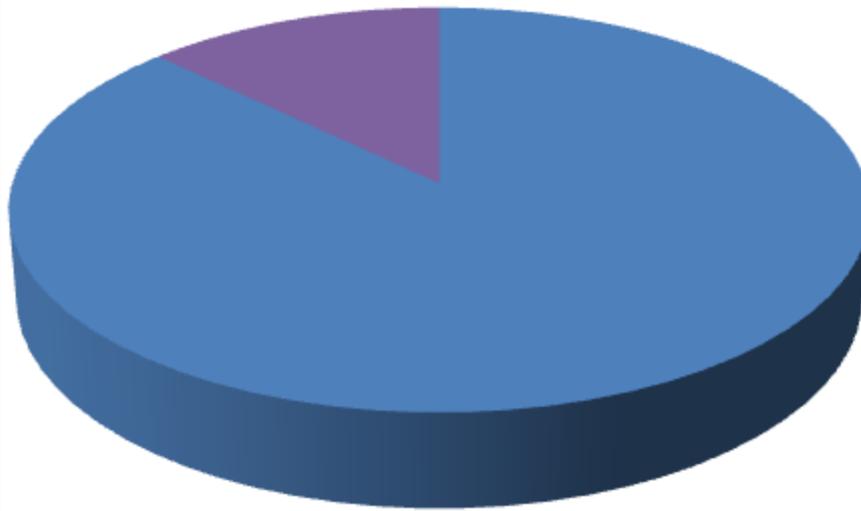
Awards funded by USAID funds and non-USAID funds?

Amount of Sub award to be reported should include non-USAID funds and USAID funds



Awards for Program Use & Prime's Own Use?

If a contract would serve both program use and a prime's own use, then the contract should be reported as a single sub-award. The total amount of the contract, and the type of use of the sub-award would be considered as "Program Use."



■ Prime's Own Use
■ Program Use

Goods or Services acquired for Program Use/Prime's Own Use

- Some examples for goods and services acquired for the prime's own use include contracts for utilities (water, electricity, gas, and trash collection); communications (telephone, fax, postal and courier services); office supplies, equipment and furniture (for your organization's use – not a Palestinian Authority Ministry), services for moving to new homes and offices; vehicles (purchase or lease) and fuel, spare parts, and repair or maintenance services for vehicles; and books, newspapers and periodicals.
 - **If for prime's own use and no written contract/purchase order, leave out of the subaward report.**

Purpose

- A brief description of the subaward
- Reason for an amendment/reference to original subaward (e.g. amendment to sub award #25)

Period of Performance

Start date (Format: **July 5, 2012**)

- The date that the sub award was executed
- The date the amendment was made.

Which date to use?

- If there is a date in the body of the agreement, and no dated signature, include the date in the body of the agreement.
- If there is a date in the body of the agreement **and also** two dates, one for each signatory, include the latter signatory date in time.
- If there is no date in the body of the agreement, but dated signatures, include the latter signatory date in time.
- If there is a date in the body of the agreement and two signatures and only one of the signatures is dated, include the date associated with the signature.

End date

- The completion date of the subaward (same format as Start Date),
- If there is no completion date in the subaward, it's ok to write “none”.

Special Provisions Columns

- “Prohibition against Support for Terrorism” included on the same date as the Start Date?
- “Restriction on Facility Names” included on same date as start date?
- “Prohibition against Cash Assistance to the Palestinian Authority” included on same date as Start Date?

YES

- If included on the same date as the start date of the award.
- In the case of an amendment, if included in the original award.

No

- In the case of an Oral Contract.
- The start date of the award doesn't match any dates that appear on the Special Provisions.

■ If no, Reason for not including the special provisions at the time of the award

- Example: “The provisions were included at the time of the award and dated, but the partner counter-signed the subaward three days after the date on the front page of the award.”

Anti Terrorism Certification (ATC)

- ATC Obtained?

YES

- If the Anti Terrorism Certification was signed with the signing of a grant instrument

N/A

- ATC doesn't apply (see Mission Order 21 Section VI)

Copies of the Anti-Terrorism Certification (ATC) must be sent with monthly report.

Vetted Prior to Award/Extension

- Vetted prior to award/extension

YES

- Vetting was received by the prime awardee prior to the start date of the award

No

- Vetting is not required

File Documented with Vetting Result or Decision Not to Vet

- File Documented with Vetting Result or Decision Not to Vet
 - Select “Yes” or “No” as to whether this decision has been documented in your files.

References

- The sub award reporting material can be found on our website;

<http://www.usaid.gov/wbg/notices.html>

- **Notice No. 2012-WBG-02 issued on February 9, 2012**
 - Reporting of Sub-Award Information
 - Attachment A - Identification of Sub awardees - Subcontractors/Sub grantees - Excel document
 - Attachment B - Frequently Asked Questions on the Sub award Report Word document
 - Sample Sub Award Form 2012 - Excel document
- **Notice No. 2009-WBG-11 issued on June 30,2009**
 - Reporting of Sub award Information
 - Power Point Attachment (used during our training sessions)

Thank You !!!

Any Questions??

Contact wbgsubdocs@usaid.gov