



Nebraska Refugee Job Training and Placement Program

Application & Program Guidelines

State of Nebraska

Revised June 2022

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.

TABLE OF CONTENTS

| | |
|---|---|
| TABLE OF CONTENTS | 2 |
| OVERVIEW & CONTACT INFORMATION | 3 |
| 1 INTRODUCTION | 4 |
| 2 ELIGIBILITY | 4 |
| 3 GRANT AMOUNTS | 6 |
| 4 APPLICATION REVIEW & APPROVAL PROCESS | 6 |
| 5 GUIDELINES & AWARD MANAGEMENT | 7 |

OVERVIEW & CONTACT INFORMATION

Rose Baker, Talent Development Team Leader
Nebraska Department of Economic Development
Business Development Division
P.O. Box 94666
245 Fallbrook Blvd, Suite 002
Lincoln, NE 68521
402-314-4819
rose.baker@nebraska.gov

| GRANT SCHEDULE | |
|------------------------|-----|
| Application Due Date | TBD |
| Anticipated Award Date | TBD |
| Contract Term | TBD |

The Nebraska Refugee Job Training and Placement program is authorized and further described within Nebraska Legislative Bill 1014, § 42 (Neb. Leg., 107th Leg. 2d Sess.).

Application Portal and Grants Management System

To administer the Nebraska Refugee Job Training and Placement Program, the Nebraska Department of Economic Development (DED) uses a grants management system (GMS), AmpliFund. DED has developed a Companion Guide to serve as a roadmap for Awardees integrating these Application & Program Guidelines and the GMS. The Companion Guide and GMS User Guides, with instructions for accessing and using the system to apply or implement a Nebraska Refugee Job Training and Placement Program grant, and other resources are available on DED's website, <http://opportunity.nebraska.gov/amplifund/>.

For technical assistance using the GMS, contact the AmpliFund support team at support@amplifund.zendesk.com. For assistance on DED's business processes in the GMS, email the DED Research team at support@dednebraska.zendesk.com.

1 INTRODUCTION

The Nebraska Legislature passed, and the Governor signed, Legislative Bill 1014 during the 2022 Legislative Session for an Act relating to appropriating funds allocated to the State of Nebraska from the Federal Coronavirus State Fiscal Recovery Fund pursuant to the federal American Rescue Plan Act of 2021. In that Act, the Nebraska Department of Economic Development (DED) was appropriated \$1,000,000 for the Fiscal Year 2021-22 to provide job training and placement grants to nonprofit organizations for employment and employability services for refugees.

DED will make an application available to nonprofit organizations for the purpose of applying for job training and placement grants to provide employment and employability services to refugees under the Nebraska Refugee Job Training and Placement program. The applications will be accepted at a date to be determined and awards will be issued until funds are exhausted.

These Application & Program Guidelines, grant schedule, listing of prior awards, and other documents can be found at the forthcoming Nebraska Refugee Job Training and Placement Program webpage on DED's website, opportunity.nebraska.gov or by contacting the Rose Baker, Program Coordinator.

GMS User Guides, with instructions for accessing and using the system to apply for and implement a Nebraska Refugee Job Training and Placement program grant, and other resources are available on DED's AmpliFund Resource page, <https://opportunity.nebraska.gov/programs/amplifund/>.

2 ELIGIBILITY

The Nebraska Refugee Job Training and Placement Program and any awards made thereunder are funded with federal funds allocated to the State of Nebraska from the federal Coronavirus State Fiscal Recovery Fund (CSFRF) pursuant to the American Rescue Plan Act of 2021 (ARPA). As such all funds must be used in compliance with section 602(c) of the Social Security Act, 42 U.S.C. § 802(c), 31 C.F.R. Part 35, the U.S. Department of the Treasury regulations implementing that section, all relevant Treasury guidance, and the Coronavirus State Fiscal Recovery Fund Award Terms and Conditions.

2.1 Eligible Use

Pursuant to 42 U.S.C. § 802(c)(1) awards made by the Nebraska Refugee Job Training and Placement Program will be made to respond to negative economic impacts with respect to the Coronavirus Disease 2019 (COVID-19) by providing assistance to impacted or disproportionately impacted households by providing awards to nonprofit organizations that provide employment and employability services for refugees as a response to the negative economic impacts of the COVID-19 public health emergency.

2.1.1 Disproportionate Impact Determination for Refugee and Legal Immigrant Households

"Disproportionately impacted" entities are those that experienced disproportionate public health or economic outcomes from the pandemic. The Nebraska Department of Economic Development determines that the households of refugees and other such legal immigrants were disproportionately impacted by the COVID-19 public health emergency.

From 2015 to 2020, an average of 800 refugees have immigrated to Nebraska annually¹. Nebraska's refugees experienced a more significant, negative economic impact during the COVID-19 pandemic than the native-born population. We analyzed the change in the labor force participation rate and employment from 2019 to 2020. The available data is for the foreign-born population, which includes legally-admitted immigrants, refugees, temporary residents such as students and temporary workers, and undocumented

¹ U.S. Department of State. (2015-2020). Refugee Arrivals: Fiscal Years 2015 to 2019. U.S. Department of Homeland Security.

immigrants². No data considers only refugees. Based on anecdotal evidence, the trends for the entire population hold true for the refugee population and are likely more negative. DED considered gender, age, educational attainment and the presence of children in the household.

Labor Force Participation Rate

The labor force participation rate describes the percent of the civilian, noninstitutionalized population, 16 years and older who are employed. It indicates both people who are working and those who are actively looking for work. In general, the refugee population has higher labor force participation rates than the native born population, except for women. However, from 2019 to 2020, both the native and foreign-born populations experienced a drop in the labor force participation rate. The refugee population experienced a larger decrease overall (1.6% vs 1.3%). This decrease was more severe for women (-1.7%), for people with less than a high school diploma (-1.5%), for high school graduates (-3.6%), and for those with children under 18 (-1.5%)³.

Employment⁴

As implied by the labor force participation rates, the refugee population experienced significant job loss from the COVID-19 pandemic – twice that of the native born population (-9.8% vs -5.4%). COVID-19 was especially difficult for women (-11.1%), for those with less than a high school diploma (-17.0%), and for high school graduates (-13.0%). Every refugee group we considered across gender, age, educational attainment and children in the household lost more jobs during the pandemic than the native born population. Foreign-born job losses were anywhere from 1.3% to 5.5% greater than the native born population across those demographic groups. Parallel to the job loss, the foreign born population had higher unemployment rates overall (9.2% vs 7.8%), across gender, age, educational attainment, and children in the household. Unemployment rates were 1.1% to 2.8% higher than the native born population⁵.

Income

In addition to the negative economic impacts from job loss, the foreign born population earns lower wages than the native born population. The overall wage in 2020 was 13% lower than the native born population. While the gap narrowed slightly from 2019 to 2020, it is still significant. Furthermore, the wage gap is widest for refugees who have less than a Bachelor's degree. Nationally, the foreign born populations had median weekly earnings of \$885 (\$46,020 per year) in 2020⁶. Nebraska's 2020 average weekly wage was 19.5% below the nation's (Bureau of Labor Statistics, exported June 8, 2022). Therefore, we can assume that refugees living in Nebraska earn about \$712 per week. On average, foreign born households who entered 2010 or later, have 1.54 workers and 3.66 people per household (U.S. Census Bureau, 2020). This implies that the average household income (\$56,996) meets the 300% FPG moderate income (\$79,500) guidelines established by Treasury for Nebraska.

The Nebraska Refugee Job Training and Placement Program is intended to help bridge the disparities in employment and income between the refugee and native born population. These disparities widened during the COVID-19 pandemic. While the data applies to a wider population (foreign born) than refugees, academic studies support the conclusions we have drawn. A study that compares refugees and immigrants from Iraq who live in Michigan found

² Bureau of Labor Statistics. (2019-2021). *Foreign-born Workers: Labor Force Characteristics (Current Population Survey)*. U.S. Department of Labor.

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

that refugees were twice as likely to be unemployed⁷. Furthermore, refugees experienced more barriers in finding a job equivalent to what they held in their home country or a job that matched their academic or professional experience. The majority (69.2%) of Nebraska's refugees have come from Burma, Bhutan, and Iraq⁸ (Refugee Processing Center, 2015-2020), making these findings relevant to Nebraska. The study, combined with economic trends, indicates that a program focusing on job placement, increasing earnings, and decreasing underemployment is especially relevant to refugees in Nebraska to help mitigate the COVID-19 pandemic.

Providing job training and placement grants to nonprofits to provide employment and employability services to refugees fall under the enumerated eligible use “[a]ssistance to individuals who want and are available for work, including job training. . .” indicated on page 18 of the *Coronavirus State & Local Fiscal Recovery Funds: Overview of the Final Rule* guidance promulgated by Treasury.

2.2 Eligible Applicants

Eligible Applicants are nonprofit organizations that provide employment and employability services for refugees.

3 GRANT AMOUNTS

The Nebraska Refugee Training and Placement Program can provide grants up to \$1,000,000.00.

4 APPLICATION REVIEW & APPROVAL PROCESS

DED will develop, make available, and accept applications at a date to be determined through its GMS, AmpliFund. The application is expected to require, at minimum the following information:

All submitted applications shall include at minimum:

- **Applicant's Organizational Overview.** Preference will be given to applications that have a defined and clear organizational structure; organizational experience in federal grants; qualified and capable personnel with experience in federal grants or equivalent credentials or experience; or can otherwise demonstrate that they will be a reliable recipient who will use all awarded funds in a manner consistent with the law and the requirements of this program.
- **Applicant's Work Plan.** Applicants will be given preference if their work plan responds to and meets the goals or objectives of the program funding, as well as evidence of the ability to meet expected outcomes.
- **Applicant's Budget.** Applicants are required to tailor budgets to actual work costs. Total request for funding itself will not determine an award. Consideration will be given to whether budget accurately reflects costs of completing the work set forth in the work plan.

Applications must be completed via DED's GMS and must fully comply with all requirements within the time period specified. Applications that do not include all of the documentation or attachments required or have not been fully completed, will not be considered. At its discretion, the DED may request supplemental materials from applicants.

⁷ Hikmet Jamil, S. S.-S. (2015). Promoters and barriers to work: a comparative study of refugees versus immigrants in the United States. Department of Health & Human Services.

⁸ Refugee Processing Center. (2015-2020). Refugee Arrivals to Nebraska by Nationality. U.S. Department of State.

4.1 Application Technical Assistance

Application will be submitted electronically, through DED's GMS. It will automatically close at the time specified. Applications cannot be submitted after that point. Once submitted, applications cannot be edited. DED will receive automatic notification of your submissions.

The user guides referenced in **bold** can be found at DED's GMS help center: <https://opportunity.nebraska.gov/programs/amplifund/>.

4.1.1 Account Management

If you do not already have an applicant account, you will need to register for one (see **Registering for the Applicant Portal** user guide). You will need to add your staff as users to your organizational account (see **How to Add Users**). If you have hired an entity to apply on your behalf ("External User"), please follow the **External Users Guide** when setting up the account. It is best practice for the applicant organization to create an AmpliFund account, adding your External User as a user in your organization.

4.1.2 Application Sections

To successfully apply, you will need to complete all required fields and sections of the applications. Applications will have the following sections:

- Project Information
- Application Forms
- Budget
- Performance Plan

See DED's GMS support site for a program-specific user guide and general user guides and help videos on applying.

5 GUIDELINES & AWARD MANAGEMENT

5.1 Award Overview

Once DED approves an application for an award, DED will issue a letter indicating as such to the Awardee. Along with the letter will be an [organization or individual] questionnaire that the Awardee must complete fully and return to DED. Upon receipt of the organization questionnaire, DED will prepare and deliver to the Awardee a Nebraska Refugee Training and Placement Program Grant Award Agreement for review and signature. This process typically happens within 30-45 days of DED's receiving the fully completed organizational questionnaire.

Awardees must review, sign, and submit the Nebraska Refugee Training and Placement Program Grant Award Agreement and meet any required special conditions items before issuance of the first disbursement. Award agreements are issued for a performance period that will extend from the agreement start date until December 31, 2026. All funds awarded must be obligated to eligible uses by July 1, 2024 and if so obligated, expended by the Awardee by December 31, 2026. Funds not obligated by July 1, 2024 will be returned to DED for transfer as required under LB1024. Obligated funds not expended by December 31, 2026 must be returned to DED for return to Treasury. For the purposes of the award, "obligation" means orders placed for property and services, contracts and subawards made, and similar transactions that require payment. Further instructions or other requirements about the award agreement may be provided to Awardees along with the NOA or by other written communication or notice.

5.2 Account Setup

Following DED's issuance of the application approval letter, the Recipient will receive a GMS-generated email from AmpliFund Administrator, no-reply@gotomygrants.com, indicating that the Recipient has an award and prompting you to log-in. There will be a with instructions on how to log-in, based on whether or not your organization has an account. This email is sent to the Account Owner, which is typically the Primary Contact as identified within the

Application. Awardees should check their spam or junk mail folder as email settings may direct this system-generated email there. If the Primary Contact's information is no longer valid, the links in the email are expired, or the email is not received within 30 days of letter of approval, the Awardee should contact the Nebraska Refugee Training and Placement Program Coordinator.

5.2.1 Log-in

The application portal is distinct from the award management side of the GMS, i.e., the URL used to apply for your grant is different from the URL you will use for checking the status of and managing your grant.

To manage your grant, always go to: <https://ne.amplifund.com> using a supported browser: Google Chrome, Mozilla Firefox, or Microsoft Edge.

To set-up your grant, please follow **What to Do When you Receive a Grant** guide on DED's GMS help center: <https://opportunity.nebraska.gov/programs/amplifund/>.

5.2.2 Add Users to your Account

Once the Recipient's Primary Contact sets up their user account, the option to add other users to help manage the grant becomes available, as does the ability to be assigned or assign tasks to complete various steps of grant implementation (e.g., sign contract, submit completed ACH form, submit payment request, etc.). Please follow the **How to Add Users** guide on DED's GMS help center.

5.2.3 Identify Recipient Grant Manager

After adding users to your account, the Recipient needs to identify a Grant Manager. This person will receive notifications ("tasks") requiring action for implementation of the grant.

NOTE: The Recipient Grant Manager is the primary point of contact for all grant-related matters. All DED and GMS automated emails are directed to the Grant Manager.

5.3 Award Agreement and Award Disbursement Process

Following DED's letter of approval, DED issues via DocuSign an electronic copy of the Nebraska Refugee Training and Placement Program Award Agreement. Unless otherwise directed, the agreement and any special conditions are available within the GMS, under Tools > Documents. The Nebraska Refugee Training and Placement Program Award Agreement is entered into between DED and the Awardee. As the Awardee is an organization or other legal entity, an authorized representative of the Awardee must sign the contract.

The Awardee must review, sign, date, and return the agreement via DocuSign to accept Nebraska Refugee Training and Placement Program awards. DED signs the contract after it is signed by the Awardee. Upon full execution of the agreement and the meeting of any required conditions specified in the contract, the Awardee may submit the First Payment Request.

5.3.1 Payment Request and Disbursement Process Overview

Upon DED's approval of payment request, DED will disburse grant funds on a reimbursement basis per request up to the full amount of the grant to the Awardee. The funds are transferred electronically to the account designated on the State of Nebraska ACH Enrollment Form which must be submitted with the signed agreement.

At any time, following the execution of the agreement and the meeting of special conditions of the agreement, the Awardee may submit payment requests. An email from AmpliFund Administrator will give notice to the Recipient Grant Manager that DED has approved the request for processing of payment. Upon subsequent processing, the email address(s) listed on the Recipient's ACH form receives notice.

Awardees can find detailed instructions for how to submit payment requests in the user guides located on DED's GMS help center, <https://opportunity.nebraska.gov/programs/amplifund/>. Payment of the

reimbursement is subject to Awardee's submission of compliance materials (e.g., paid invoices, cancelled checks, etc.) for review and approval by DED.

The timing of the final disbursement request depends on the Awardee's ability to document expenditure of funds as required in the agreement but should be submitted to DED on or before the end of the contract term.

5.4 Compliance & Reporting Requirements

Once the grant awards are made, Awardees will be subject to applicable state and federal statutes and regulations which govern the use of the award funds. The following is a general overview of compliance and reporting requirements. It should not be considered an exhaustive review of all compliance and reporting requirements. In all instances, Awardees should review the statutes and regulations and agreement terms and conditions applicable to Awardee's use of their award.

5.4.1 Uniform Administrative Requirements

The Nebraska Refugee Job Training and Placement Program grant awards are generally subject to the requirements set forth in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200 (the "Uniform Guidance"). Awardees should review the Uniform Guidance requirements applicable to Applicant's use of federal funds, and federally funded projects. Awardees should consider how and whether certain aspects of the Uniform Guidance apply. The following provides a general summary of compliance responsibilities under applicable federal statutes and regulations, including the Uniform Guidance, as described in 2020 OMB guidance. Note that the descriptions below are only general summaries, and all Awardees are advised to carefully review the Uniform Guidance requirements, any additional regulatory and statutory requirements applicable to the program, and the terms and conditions of the Nebraska Refugee Training and Placement Program Award Agreement.

Allowable Activities. Each Awardee should review program requirements, including Treasury's Interim Final Rule (CITE HERE) and the recipient's Award Terms and Conditions, to determine and record eligible uses of funds. Per 2 CFR 200.303, Awardees must develop and implement effective internal controls to ensure that funding decisions under the award constitute eligible uses of funds, and document determinations.

Allowable Costs/Cost Principles. As outlined in the Uniform Guidance at 2 CFR Part 200, Subpart E regarding Cost Principles, allowable costs are based on the premise that a Recipient is responsible for the effective administration of Federal awards, application of sound management practices, and administration of Federal funds in a manner consistent with the program objectives and terms and conditions of the award. Awardees must implement robust internal controls and effective monitoring to ensure compliance with the Cost Principles, which are important for building trust and accountability.

Funds may be, but are not required to be, used along with other funding sources for a given project. Note that funds may not be used for a non-Federal cost share or match where prohibited by other Federal programs.

Treasury's Final Rule and guidance and the Uniform Guidance outline the types of costs that are allowable, including certain audit costs. For example, per 2 CFR 200.425, a reasonably proportionate share of the costs of audits required by the Single Audit Act Amendments of 1996 are allowable; however, costs for audits that were not performed, or not in accordance with 2 CFR Part 200, Subpart F are not allowable. Please see 2 CFR Part 200, Subpart E regarding the Cost Principles for more information.

Eligibility. Under this program, if applicable, Awardees are responsible for ensuring funds are used for eligible purposes. Generally, Awardees must develop and implement policies and procedures, and record retention, to determine and monitor implementation of criteria for determining the eligibility of beneficiaries and/or subrecipients. Awardees will need to maintain procedures for obtaining information evidencing a given beneficiary, subrecipient, or contractor's eligibility including a valid SAM.gov registration. Implementing risk-based due diligence for eligibility determinations is a best practice to augment Awardee's existing controls.

Equipment and Real Property Management. Any purchase of equipment or real property with Nebraska Refugee Job Training and Placement Program funds must be consistent with the Uniform Guidance at 2 CFR Part 200, Subpart D. Equipment and real property acquired under this program must be used for the originally authorized purpose. Consistent with 2 CFR 200.311 and 2 CFR 200.313, any equipment or real property acquired using Nebraska Refugee Job Training and Placement Program funds shall vest in the non-Federal entity. Any acquisition and maintenance of equipment or real property must also be in compliance with relevant laws and regulations.

Period of Performance. Generally, unless otherwise limited by this program, funds must be used for costs incurred by the recipient during the period that begins on March 3, 2021, and ends on December 31, 2024. Award funds expended for the financial obligations incurred by December 31, 2024, must be expended by December 31, 2026.

Procurement, Suspension & Debarment. Awardees are responsible for ensuring that any procurement using award funds, or payments under procurement contracts using such funds are consistent with the procurement standards set forth in the Uniform Guidance at 2 CFR 200.317 through 2 CFR 200.327, as applicable. The Uniform Guidance establishes in 2 CFR 200.319 that all procurement transactions for property or services must be conducted in a manner providing full and open competition, consistent with standards outlined in 2 CFR 200.320, which allows for non-competitive procurements only in circumstances where at least one of the conditions below is true: the item is below the micro-purchase threshold; the item is only available from a single source; the public exigency or emergency will not permit a delay from publicizing a competitive solicitation; or after solicitation of a number of sources, competition is determined inadequate. Awardees must have and use documented procurement procedures that are consistent with the standards outlined in 2 CFR 200.317 through 2 CFR 200.320. The Uniform Guidance requires an infrastructure for competitive bidding and contractor oversight, including maintaining written standards of conduct and prohibitions on dealing with suspended or debarred parties. Awardees must ensure adherence to all applicable local, State, and federal procurement laws and regulations.

Program Income. Generally, program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under Federal awards and principal and interest on loans made with Federal award funds. Program income does not include interest earned on advances of Federal funds, rebates, credits, discounts, or interest on rebates, credits, or discounts. Awardees of Nebraska Refugee Job Training and Placement Program funds should calculate, document, and record the organization's program income. Additional controls that Awardees should implement include written policies that explicitly identify appropriate allocation methods, accounting standards and principles, compliance monitoring checks for program income calculations, and records.

The Uniform Guidance outlines the requirements that pertain to program income at 2 CFR 200.307. Treasury intends to provide additional guidance regarding program income and the application of 2 CFR 200.307(e)(1), including with respect to lending programs.

SAM.gov Requirements. Awardees are required to have an active registration with the System for Award Management (SAM) (<https://www.sam.gov>).

Recordkeeping Requirements. Generally, Awardees must maintain records and financial documents for five years after all funds have been expended or returned. Treasury may request transfer of records of long-term value at the end of such period. Wherever practicable, such records should be collected, transmitted, and stored in open and machine-readable formats. Awardees must agree to provide or make available such records to the State of Nebraska, Nebraska Department of Economic Development, and the U.S. Department of Treasury upon request, and to any authorized oversight body, including but not limited to the Government Accountability Office ("GAO"), Treasury's Office of Inspector General ("OIG"), and the Pandemic Relief Accountability Committee ("PRAC").

Single Audit Requirements. Generally, Awardees that expend more than \$750,000.00 in federal awards during their fiscal year will be subject to an audit under the Single Audit Act and its implementing regulation at 2 CFR Part 200, Subpart F regarding audit requirements. Awardees may also refer to the Office of Management and Budget (OMB) Compliance Supplements for audits of federal funds and related guidance and the Federal Audit Clearinghouse to see examples and single audit submissions.

Civil Rights Compliance. Awardees are required to meet legal requirements relating to nondiscrimination and nondiscriminatory use of the funds. Those requirements include ensuring that entities receiving Federal financial assistance from the Treasury do not deny benefits or services, or otherwise discriminate on the basis of race, color, national origin (including limited English proficiency), disability, age, or sex (including sexual orientation and gender identity), in accordance with the following authorities: Title VI of the Civil Rights Act of 1964 (Title VI) Public Law 88-352, 42 U.S.C. 2000d-1 et seq., and Treasury's implementing regulations, 31 CFR part 22; Section 504 of the Rehabilitation Act of 1973 (Section 504), Public Law 93-112, as amended by Public Law 93-516, 29 U.S.C. 794; Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. 1681 et seq., and the Department's implementing regulations, 31 CFR part 28; Age Discrimination Act of 1975, Public Law 94-135, 42 U.S.C. 6101 et seq., and the Department implementing regulations at 31 CFR part 23.

Davis-Bacon Act. While the Davis-Bacon Act requirements (prevailing wage rates) do not apply to projects funded solely with award funds from the SLFRF program, except for certain SLFRF-funded construction projects undertaken by the District of Columbia, when undertaking capital expenditures, Treasury encourages awardees to adhere to strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions. Treasury also encourages awardees to prioritize in their procurements, employers with high labor standards and to prioritize employers without recent violations of federal and state labor and employment laws. Additional standards may be applicable based on state statutes and award agreement terms and conditions.

NEPA Applicability. The National Environmental Policy Act (NEPA) does not apply to Treasury's administration of the SLFRF program, although projects supported with SLFRF funds may still be subject to NEPA review if they are also funded by other federal financial assistance programs.

To carry out any compliance responsibilities DED will collect and review information from Awardees to ascertain their compliance with the applicable requirements before and after providing financial assistance. Treasury's implementing regulations, 31 CFR part 22, and the Department of Justice (DOJ) regulations, Coordination of Non-discrimination in Federally Assisted Programs, 28 CFR part 42, provide for the collection of data and information from Awardees (see 28 CFR 42.406). DED may request that Awardees submit data for post-award compliance reviews, including information such as a narrative describing their Title VI compliance status.

7.5 Reporting Requirements

All Awardees must complete financial, performance, and compliance reporting as required by their Nebraska Refugee Training and Placement Program Award Agreement. Expenditures may be reported on a cash or accrual basis, as long as the methodology is disclosed and consistently applied. Reporting must be consistent with the definition of expenditures pursuant to 2 CFR 200.1. Awardees should appropriately maintain accounting records for compiling and reporting accurate, compliant financial data, in accordance with appropriate accounting standards and principles. In addition, where appropriate, Awardees must establish controls to ensure completion and timely submission of all mandatory financial, performance, and/or compliance reporting. Recipient shall provide a copy of the results of their annual single audit or a programs specific audit when applicable.

Awardees can find detailed instructions for how to submit reporting requirements in the user guides located on DED's GMS help center, <https://opportunity.nebraska.gov/programs/amplifund/>.