

## **COMMUNITY-BASED ORGANIZATION TRAINING – OCTOBER 31, 2013**

### **Clarification of Questions & Answers from Training Sessions:**

Questions may have been edited for clarity.

Q. I have a question about other funder's requirements that may be in conflict with the County's contractual requirement related to Level II Background Screening. For example, Miami-Dade Public Schools have different standards.

A. If another entity or funder has another requirement or exemption policy then provide us that information and we will make an individual decision.

Q. Would a one-time donation that was put into a separate account and will not be a recurring funding source be shown in the agency-wide budget?

A. It would be shown for the year in which it was donated only.

Q. My organization received a finding on our site visit report which stated that a sub-contractor's invoice was paid late. However, it was paid late due to the timing of contract execution and our organization's ability to receive reimbursement.

A. All findings cited in a site visit report are subject to an organizational response in the form of a Corrective Action Plan (CAP). If the contract was indeed not executed in a timely manner, that response would be accepted and the finding would be lifted. However, it is the responsibility of the organization to ensure the continuity of the program(s) and the availability of needed funding during the entire contract period independent of the timing of the County's payments or reimbursements as specified in the contract.

Q. Are training and development costs for direct service staff considered Direct or Indirect Expenses?

A. They would be considered Indirect Expenses.

Q. Are we required to use County General Funds to pay for Indirect Costs?

A. No.

Q. If I am a member of my organization's Board of Directors and also an Instructor for one of our County-supported programs can I get paid?

A. According to the Conflict of Interest Section in the contract agreement, your organization will need to submit a justification, in writing, as to the process and rationale used to hire you above other candidates for the Instructor position and as a Board member you will have to recuse yourself from any decision related to the compensation or benefits for that position.

Q. My organization uses many volunteers. Do they all need to complete a Level II Background Screening?

A. It depends on what the volunteers do for your program and the type of clients they work with. There are too many variables to give a general yes or no answer. You will need to read the Florida Statutes related to the Background Screening requirements. If you have additional questions, you may contact your assigned Contracts Officer.

Q. Does my organization's other funding streams have to be used in the same way as the County's funding?

A. The County cannot mandate how you use or allocate your organization's other funds.

Q. May rent or occupancy costs be counted as a Direct Cost?

A. You may be able to justify a portion of your facility costs as a Direct Costs depending on the situation. For example, if you have a 10,000 square foot office and half of it is used by case managers to meet with their clients; then you may be able to justify that half your rent is a Direct Cost.

Q. If you have and/or are planning a change in organizational status or program should I notify the County?

A. Per contractual Notice Requirements, yes, your organization has ten (10) days to notify the County of any changes to your organization, program, locations, staffing, hours, etc.

Q. Does Board of Director meeting minutes become public record?

A. Yes, however, all confidential information (i.e., health information, social security numbers, etc.) that is also outlined in public record law is protected and would be redacted (blacked out) from the record before release.

Q. Why would we have to submit a waiver related to the 25% percent administrative cap mandate?

A. Your organization would only need to submit a waiver request if you could not comply with the mandate.

Q. Does every Board of Director's meeting minutes need to be submitted to the County?

A. Yes.

Q. For income that comes into a program throughout the year, even small dollar donations, do we have to report that?

A. Send your Contracts Officer an annual projection of this type of funding including amount and frequency, and we will advise accordingly on a case by case basis.

Q. Is there a waiver to the 15% cap on indirect costs per program?

A. No.

Q. Our organization's budget contains goals that are projected through the year that sometimes we make and sometimes we don't. How will that count in the agency-wide budget submission?

A. A budget is always an estimate until the year ends and then you can total actual expenditures. However, it is crucially important that you use justifiable and reasonable assumptions when developing your estimated annual agency-wide budget. It is also as crucially important that you regularly reconcile your estimated budget with actual expenditures to be as on target as possible with all earmarks including the County's 25% administrative cap. An updated agency-wide budget must be submitted to OMB-GC immediately after the agency becomes aware of a grant or other source of expected revenue that is not received as projected and/or estimated. Such event could possibly result in an increase in the percentage of the indirect/administrative costs allocated to the County's General Fund and, therefore, be in violation of the BCC resolution.

Q. What if our organization chooses not to use any County General Funds towards our indirect costs, do we still have to submit an agency-wide budget?

A. Yes.

Q. We have a large, national parent organization. Do you want their Board of Director's meeting minutes or our local BOD minutes?

A. We want the local program's BOD meeting minutes.

Q. Can we submit our budgets in our own format?

A. Our office prefers that you submit your budgets on the format supplied by OMB-GC. However, if your format contains all the information that we request in our format, you can submit a sample to see if that is acceptable.

Q. Would the County accept a financial review instead of an audit?

A. The County does not require that an audit be completed. We do, however, require that if you have an audit completed for any reason, that you share that audit with the County.

Q. Can we receive training on budget development?

A. Yes, but be very specific on what you want the training to cover and what you need to get out of the training so that the Contracts Officer can make sure that the appropriate staff from our office are included in the training.

Q. Can we insist that our landlord pay his back due property taxes?

A. In general, this appears to be a landlord/tenant issue. However, there may be other variables and specific facts that may change our opinion. Provide your Contract Officer with your specific situation and we will address it on a case by case basis.

Q. I have a concern about confidentiality of client records. Should we get a client consent or release?

A. At no point did we say that the County would share client records with anyone or any other outside, non-County organization. Developing and getting client consent is a

business decision for your organization. We do, however, recommend that all organizations use a unique client identifier system.

Q. Why are we subject to Florida Statutes if this is not state funding?

A. Because your organization is located and operates in the state of Florida and is subject to compliance with all Florida laws.

Q. Do we need to submit subcontractor agreements to the County for approval?

A. Yes, any and all subcontracts need to be approved by the County in advance. However, if we have already approved multi-year subcontracts send your Contracts Officer an e-mail letting them know that you are simply renewing the subcontracts with no changes and requesting County re-approval.