



## **Recipient Guidelines and Requirements**

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**February 2023**

**APPROVED**

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## Introduction

This document contains guidance and requirements for all Denali Commission Financial Assistance Awards. If you cannot find the information you need or if you have questions about any aspect of your Financial Assistance Award (FAA), please contact your Denali Commission Program Manager or the Commission's Grants Office at (907) 271-1414.

Information about the Denali Commission can be obtained on our web site, [www.denali.gov](http://www.denali.gov).

### I. PROJECT MANAGEMENT

Please download the [Denali Recipient User Manual](#). This document will provide detailed and illustrated guidance for accessing the newly updated Denali Commission Project Database system.

- *What To Do First*

Before starting a Denali Commission project, read your Financial Assistance Award.

Log in to the Commission Database (Database) system, [Denali Commission Login](#) to access the electronic reporting for your FAA. If you have not established an account, click on the link for new users on the main page and follow the instructions to create a new account. Contact the Grants Administrator at (907) 271-1414 or email [dbadmin@denali.gov](mailto:dbadmin@denali.gov) for assistance.

Denali Commission Federal Award Agreements (FAA) are stored electronically in the Database. The FAA also identifies your Denali Commission Program Manager and his/her contact information. You are responsible for keeping your contact information up to date in the Database for your project.

Note the project's start and end dates (the project period or period of performance) so that you are on track to meet Denali Commission's reporting requirements. Review the projected performance measures for your project. You are responsible for tracking these measures and reporting your progress in interim and final reports to the Database.

- *Starting the Project*

You should begin work on your Denali Commission funded project as soon as the period of performance begins. You do not have to contact the Denali Commission before you begin, unless the FAA includes specific requirements that must be met prior to the start of certain activities, e.g., preparation of environmental documents, submission of bonds and insurance certificates for certain types of construction contracts. Your Denali Commission contacts are available, however, to answer questions and provide guidance as needed.

- *Cooperative Agreement Provision*

Depending on the nature of the project some FAA's may include a Cooperative Agreement Provision. If the Commission elects to include such provision, it will be part of the narrative in Attachment A of the FAA, under the section entitled Project Delivery Method. A Cooperative Agreement Provision is included in an FAA when the Commission will be substantially involved in implementing the project or components of the project and requires the Recipient to cooperate and collaborate with the Commission during the project. Cooperative Agreement Provisions will stipulate specific activities that Commission staff will be involved with, responsibilities assumed, assistance, and/or direction to be given by Commission staff during the project. The Commission's substantial involvement under the FAA shall cease when it is closed.

## **II. REPORTING & SITE VISITS**

- *Reporting Intervals*

The Denali Commission requires interim progress reports as stipulated in the Special Provisions section of the FAA, and a final report at the end of the project's Period of Performance. The reporting period begins on the start date indicated in the FAA. See Appendix A for detailed instructions on reporting.

If program activities did not start within the first period, or if the project is delayed any time during the reporting period, a progress report is still required, explaining the reasons for the delay and how any problems are being resolved. The following are the fiscal year quarterly dates for reporting:

1 <sup>st</sup> Quarter: October 1 thru December 31	Reports Due on January 30
2 <sup>nd</sup> Quarter: January 1 thru March 31	Reports Due April 30
3 <sup>rd</sup> Quarter: April 1 thru June 30	Reports Due July 30
4 <sup>th</sup> Quarter: July 1 thru September 30	Reports Due October 30

- *Late Reporting*

Recipients have agreed to the terms of funding in the FAA and therefore have agreed at the time of signature to comply with the reporting requirements outlined in the Special Provisions. Not submitting reports may lead to suspension of payments and eventual termination of an FAA. The process for suspension and termination of funding due to late reporting is as follows:

1. Notification is sent to the Recipient via e-mail 1 day after the due date if a report has not been submitted.

2. Fifteen days after the first notice (30 days late) the Denali Commission Program Manager will contact the recipient notifying them that suspension of their funding may occur if reporting is not completed.
3. A final notice is sent 30 days after the second notice (60 days late). The final notice may include a letter signed by the Director of Programs informing the Recipient that all financial payments have been suspended. If payments are suspended, all past due reporting must be submitted and approved in order for financial payments to resume.
4. If continued delinquencies ensue, the FAA may be terminated.

**(A) *Interim Progress Reports***

• *Required Content for Interim Reports*

1. Total expenditures for the project as of the end of the reporting period, including both Denali Commission and other funding sources. An analysis and explanation of any cost overruns or high unit costs.
2. Updated schedule and milestone information.
3. Narrative summary of the project status and accomplishments to date that addresses the following questions: is the project on schedule, is the project on budget, have all required permits been obtained, and what actions are planned to address any project problems. Include a comparison of actual accomplishments to the objectives, and if applicable, the reasons why established goals were not met.
4. Digital photographic documentation of progress that provides a complete record of construction at end of the project.

**(B) *Closeout Report***

• *Required Content for Closeout Reports*

1. Final project expenditures itemized by the following categories:
  - a. Planning and/or Design
  - b. Construction
    - Labor
    - Materials, Equipment, Freight and Other Direct Costs
    - Project Management/Administration
  - c. Indirect Costs

2. Narrative that summarizes project scope, deliverables, budget, delivery method, and schedule. Include a discussion of any unique circumstances or events that occurred during the project, and a final reconciliation of any match funding requirements.

Closeout reports should be stand-alone pdf documents that are uploaded as attachments in the Commission's Project Database System. The final report is an opportunity to share the significant features of a project and present information about the results the project achieved. The document should be written as if the reader has no previous knowledge of the project's activities. The report should cover the entire period of performance and include information on project budget and list all funding sources and amounts. If Commission funds were only used for a portion of a project, describe the overall project and how Commission funds were used in the context of the overall project. The report must review and highlight all activities that occurred during the project, including an assessment of all performance measures that were originally proposed. Closeout reports should also include information on schedule, delivery method, A/E, contractor, representative photos, etc. in a well-organized, logical format. The report is intended to be a stand-alone document summarizing the project so that it can be distributed to the public and other key stakeholders upon request.

Recipients will receive an auto-generated email notification when the Denali Commission has closed the project.

### ***(C) Site Visits***

Commission staff or agents of the Commission may make visits to the project site and/or home office to monitor progress during and/or after the Period of Performance. The Recipient shall coordinate and make information available as necessary to facilitate any such site visits. If additional project information is requested by the Commission as a result of a site visit, the Recipient shall promptly provide the requested information.

## **III. PAYMENTS**

All Denali Commission FAA recipients are required to have a current registration in the SAM.gov (System for Award Management) application. SAM.gov replaced and consolidated CCR (Central Contractor Registration) and ORCA (Online Representations and Certifications Application). Recipients must complete an initial SAM.gov application and renew/update information annually. SAM.gov allows for recipients to elect the banking account information to which FAA payments are made. The SAM.gov application is available at <https://sam.gov/>. Questions on banking information can be directed to [denalicommissionfinance@denali.gov](mailto:denalicommissionfinance@denali.gov).

Payments are made by electronic transfer in response to a "Request for Advance or Reimbursement" on a [Standard Form 270 \(SF-270\)](#) submitted by the Recipient. The form is available on the Denali Commission website: [www.denali.gov](http://www.denali.gov). The SF-270 must be



submitted to the Denali Commission via e-mail at [denalicommissionfinance@denali.gov](mailto:denalicommissionfinance@denali.gov). Payments shall be made in accordance with [2 CFR Part 200.305](#). Please contact your Denali Commission Program Manager at (907) 271-1414 for further information about submitting this form.

Payments may be tracked in the Denali Commission Database by viewing the electronic record for an FAA. Select the “Financial” tab, and then select “Drawdowns” for a record of all payments.

If interest is earned on FAA funds, the Recipient may retain up to \$500 per year for administrative expenses in accordance with [2 CFR 200.305](#). Any additional interest or profit must be forwarded to the Denali Commission at the end of the project for deposit at the U.S. Treasury.

#### ***(A) Reimbursements***

Requests for reimbursements may be made as needed. The request should include:

1. SF-270
2. Backup documentation, e.g., invoices, bids, or proposals showing expenditures
3. Additional information required by the Program Manager

Commission staff review the SF-270 and supporting documents to confirm that expenditures are consistent with the approved budget and reflect the project’s progress described in the narrative report. See Appendix B for additional instructions for reimbursements.

#### ***(B) Advance Payments***

Advances shall be limited to the minimum amount necessary to meet immediate disbursement needs, but never for the final payment. The advance payment request should include:

1. SF-270
2. Statement explaining why the advance is necessary
3. Backup documentation to include invoices, bids, or proposals showing estimated expenditures for the forecasted period
4. Additional information required by the Denali Commission Program Manager

If a recipient demonstrates an unwillingness or inability to establish procedures that will minimize the time elapsing between the transfer of funds and disbursement, or otherwise fails to continue to qualify for the advance method of payment, the Program Manager may change the method of payment to reimbursement only.

### ***(C) Final Payments***

Final payments are processed when the Program Manager approves the project closeout report and typically take longer than interim payment requests. Closeout reports must reflect activities and costs for the entire performance period. The final payment report must also include source and amount of all matching funds. The final budget should also detail how all matching funds were used. The final financial report and final narrative report are due within 90 days of the end of the performance period.

## **IV. MODIFICATIONS TO A FINANCIAL ASSISTANCE AWARD**

- *Changing the Period of Performance*

If a project cannot be completed within the approved period of performance, an extension request must be submitted **prior to the end date** by email to your Program Manager. The request must include the reason for the extension and the proposed new end date. Project extensions require concurrence of the Denali Commission Director of Programs.

- *Other Modifications*

Recipients must submit requests in advance for deviations in project scope, budget, schedule, or changed site conditions in accordance with [2 CFR 200.308](#). Requests for such changes must be submitted in writing to the Program Manager. FAA modifications require concurrence of the Denali Commission Director of Programs.

## **V. FINANCIAL MANAGEMENT, RECORDS, INTERNAL CONTROLS, & AUDITS**

### ***(A) Office of Management and Budget Requirements (OMB)***

Denali Commission Awards must be administered in accordance with the guidance found in [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(2 CFR Part 200\)](#), which has replaced the OMB Circulars listed below. The recipient is expected to be familiar with this document. Hard copies can be ordered directly from the Office of Management and Budget by calling (202) 395-7332.

### ***(B) Suitable Accounting Systems***

Project expenditures must be maintained in a format acceptable pursuant to [2 CFR Part 200.302](#) and any applicable State laws.

### ***(C) Internal Controls***

Recipients must establish, maintain, comply, evaluate, and monitor effective internal control over the FAA in compliance with [2 CFR 200.303](#), Federal statutes, regulations,

and the terms and conditions. Recipients must take prompt action when instances of non-compliance are identified.

Recipients must take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency designates as sensitive of the recipients considers sensitive consistent with applicable Federal, state, and local laws regarding privacy and obligations of confidentiality.

#### **(D) *Audit Requirements***

Recipients must maintain accurate and complete records related to Denali Commission FAA's and make these available for audit, as necessary, by the Denali Commission or the Government Accountability Office. Each year, the Denali Commission Office of the Inspector General conducts random audits of selected FAA's to ensure compliance with the Terms and Conditions, Special Provisions, and applicable regulations.

Audit requirements, formerly included in OMB Circulars A-133 and A-50: *Audits of States, Local Governments, and Nonprofit Organizations* are now in [2 CFR 200 Subpart F](#) Federal Single Audits must be submitted to the Federal Audit Clearinghouse at <https://harvester.census.gov/facweb/> in accordance with [2 CFR 200.501](#), which requires Recipients that expend \$750,000 or more of Federal funds in a year to have a single or program-specific audit conducted for that year.

#### **(E) *Key Audit Issues***

1. Separate Accounts: If a Recipient organization manages several Financial Assistance Awards, each one must be accounted for separately, including receipts, expenditures, and any matching requirements.
2. In-kind and Third Party Contributions: If a project will be using in-kind or third party contributions for matching purposes, documentation must be maintained including a listing of sources and an indication of how the contributions were valued, (e.g., comparable or similar type positions or services in area) in accordance with [2 CFR 200.306](#). Invoices must support services and other expenditures.
3. Travel Costs: Travel claims must follow written policies of the Recipient organization when consistent with the cost principles in [2 CFR 200](#) applicable to the organization. Invoices must support costs and expenditures.
4. Pre-award and Post-Performance Costs: The Denali Commission will not reimburse expenditures occurring before or after the FAA performance period, unless specifically authorized in the FAA Special Provisions. As noted in Section IV above, extensions to the Period of Performance must be requested, and approved by the Denali Commission, before the FAA period expires.

5. Support of Salaries and Wages: Recipients should be familiar with the provisions of 2 CFR 200.430 related to maintaining documentation for salaries and wages. **Recipients should note, in particular, that reports of salaries and wages must reflect an after-the-fact determination of the actual activity of each employee. Budget estimates generated before the services are performed do not qualify as support for charges to the FAA.**

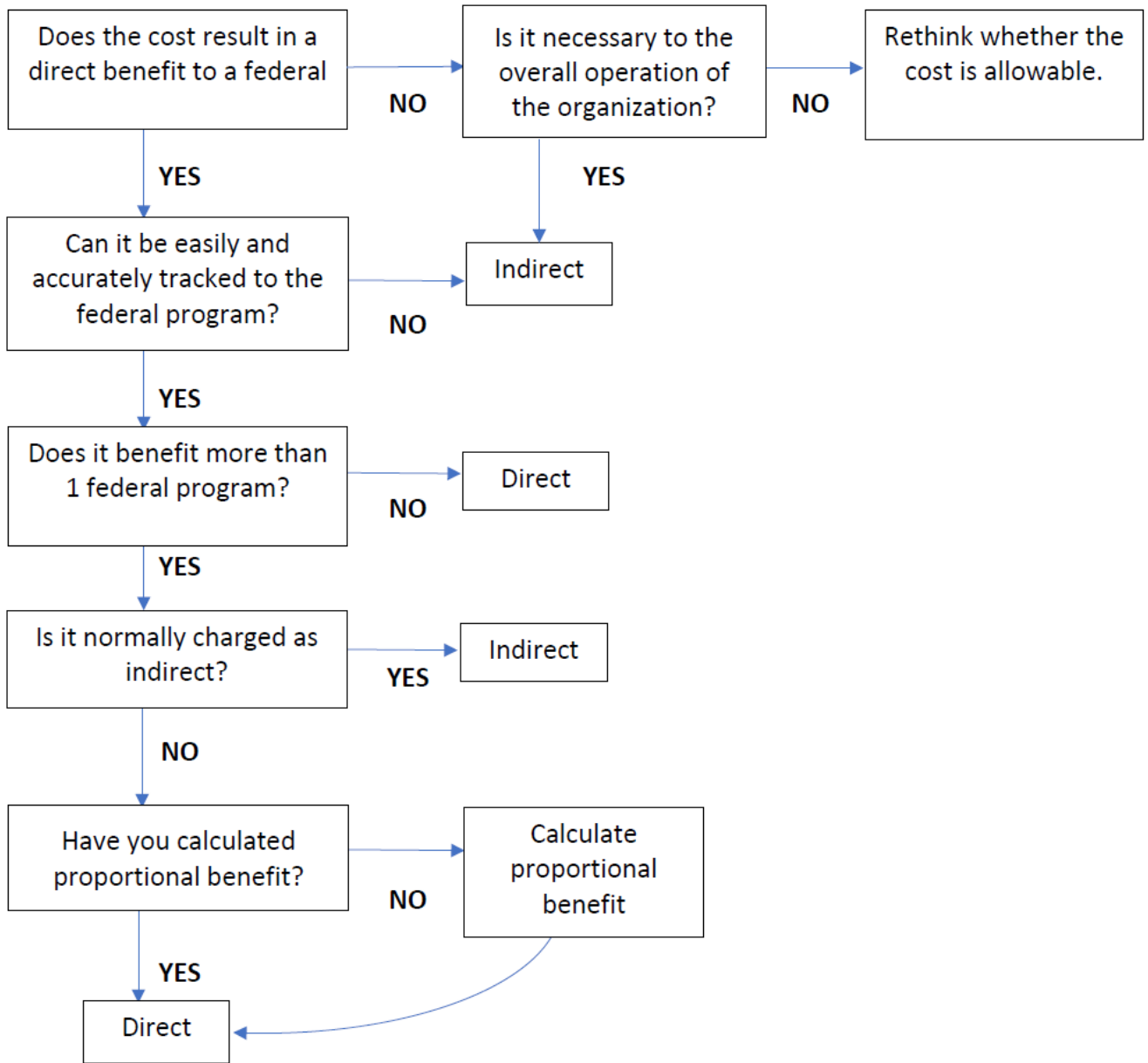
## **VI. DIRECT AND INDIRECT COSTS**

[2 CFR 200 Subpart E \(Cost Principles\)](#) contains specific guidance on allowable direct costs and allocable indirect costs. A Recipient's accounting policies and practices must comply with the cost principles outlined in Subpart E and provide for adequate documentation to support costs charged to the FAA. There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to an FAA or other final cost objective. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances, either as a direct or indirect cost, in order to avoid possible double-charging of FAA's.

Some types of expenditures are expressly unallowable, either as a direct or indirect cost. Some examples include alcoholic beverages, bad debts, contributions, entertainment, fund raising and lobbying. Recipients may not earn or keep any profit resulting from Federal financial assistance, unless explicitly authorized in the FAA.

The following table may be useful in classifying direct and indirect costs:

**Direct/Indirect Decision Tree**



**(A) Direct Costs**

Direct costs charged against an FAA must be both allowable and reasonable. Refer to [2 CFR 200.403](#) for criteria on the allowability of costs. Refer to [2 CFR 200.404](#) for criteria in determining the reasonableness of a given cost. Refer to [2 CFR 200.420](#) for detailed information on specific items of cost. Direct costs must be estimated and organized into logical categories in the FAA budget. Support documentation must be submitted with requests for reimbursement or advance payments under an FAA.

## **(B) Indirect Costs**

Indirect (facilities & administrative) cost pools must be distributed to benefitted cost objectives on a basis that produces an equitable result in consideration of relative benefits derived. All activities which benefit from indirect costs, including unallowable activities and donated services by the Recipient or other parties, must receive an appropriate allocation of indirect costs. Refer to [2 CFR 200.405](#) for guidance on how to ensure these standards are met.

1. Recipients and Sub-recipients that are able to allocate and charge 100% of their costs directly may do so.
2. If a Recipient or Sub-recipient already has a negotiated indirect rate with the Federal government, the Denali Commission will accept the negotiated rate for use in allocating indirect costs under the FAA.
3. In accordance with [2 CFR 200.414](#), a Recipient that has never received a negotiated indirect cost rate, except State/Local Government Departments/Agencies that receive more than \$35 million per year in federal funding, may elect to charge a de-minimis rate of 10% of modified total direct costs (MTDC). However, if a Recipient or Sub-recipient elects to use the de-minimis rate for a Denali Commission FAA, they must use this methodology for all Federal awards until such time as the Recipient or Sub-recipient chooses to negotiate a rate.
4. The Commission may use a rate different from the negotiated or de-minimis rate for a class of awards or a single award when required by Federal statute or regulation, or when approved by the Commission agency head or delegate in accordance with [2 CFR 200.414\(c\)](#).
5. Claiming reimbursement for indirect costs is never mandatory; a Recipient or Sub-recipient may conclude that the amount it would recover thereby would be immaterial and not worth the effort needed to obtain it. Accordingly, Recipients and Sub-recipients may propose an indirect rate lower than their negotiated rate or the de-minimis rate for any particular FAA, provided they do so in writing and the proposal is signed by an official authorized to legally bind the organization.
6. Recipients and Sub-recipients must clearly identify what indirect cost rate will be used to calculate their indirect costs in the FAA budget. If the rate is a federally negotiated rate, the budget must include notes identifying the cognizant agency and date the rate was approved. In developing FAA budgets, Recipients and Sub-recipients shall apply an appropriate indirect cost rate to the Modified Total Direct Costs (MTDC) in the budget, unless there is a more appropriate/equitable distribution base for the specific indirect cost rate. If MTDC is not used in the calculation of indirect costs in the FAA

budget, the Recipient or Sub-recipient shall submit a written explanation and request to the Commission for approval during development of the FAA budget.

7. [MTDC is defined](#) as all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first \$25,000 of each sub-award, sub-contract, or professional service agreement (regardless of the period of performance of the sub-award, sub-contract, or agreement). MTDC excludes equipment, rental costs, capital expenditures, charges for patient care, tuition remission, scholarships and fellowships, participant support costs and the portion of each sub-award, sub-contract, or professional service agreement in excess of \$25,000.
8. In accordance with [2 CFR 200.415](#) all payment vouchers and fiscal reports must include the following certification, signed by an official authorized to legally bind the organization.

*By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the FAA. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729 – 3730 and 3801 – 3812)*

## **VII. SUB-AWARDS AND CONTRACTS**

Recipients shall ensure that all sub-awards comply with [2 CFR 200.331](#), and [332](#) if applicable. All contracts issued by Recipients under the FAA shall contain the provisions in [Appendix II to 2 CFR 200](#) related to breach of contract, termination for cause and/or convenience, equal employment opportunity, Work Hours and Safety Standards Act, inventions, Clean Air Act, debarment and suspension, Byrd Anti-Lobbying Amendment, and the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act. The Davis-Bacon Act does not apply to construction projects supported with Denali Commission “Base” funds (provided via Energy & Water Appropriation Bills) or “TAPL” funds (allocations from the Trans-Alaska Pipeline Liability Fund). If FAA’s include funds from other sources with specific Davis-Bacon requirements, said requirements will be included in the FAA Special Provisions.

## **VIII. ACKNOWLEDGEMENT OF SUPPORT**

Recipients shall display a sign that acknowledges support for construction projects supported via Commission FAA’s. The Recipient must request an indoor and/or an outdoor sign from the Commission office. Pickup or delivery of the sign can be arranged.

Recipients shall include the Denali Commission as a financial contributor and project and/or program partner on all media correspondence including, but not limited to, press releases, interviews, and statements to the media. The recipients shall also provide the Denali Commission with copies of any press materials distributed.

## **IX. REAL PROPERTY AND EQUIPMENT**

Title to Real Property and Equipment acquired or improved via a Commission FAA will vest upon acquisition in the Recipient. However, such title is conditional in that the disposition requirements and restrictions set forth in [2 CFR 200.310 through 200.316](#) and other requirements in the FAA Special Provisions shall apply. Further, with respect to Real Property the Commission may impose post award reporting requirements in accordance with [2 CFR Part 200.329](#). Any such reporting requirements will be stipulated in the FAA Special Provisions.

## **X. CONFLICT OF INTEREST**

“Interested Party” means any officer, employee, or member of the board of directors or other governing board of the Recipient, including any other parties that advise, approve, recommend or otherwise participate in the business decisions of the Recipient; such as agents, advisors, consultants, attorneys, accountants or shareholders. An Interested Party also includes the Interested Party's Immediate Family and other persons directly connected to the Interested Party by law or through a business arrangement.

### ***(A) General***

It is the Denali Commission’s policy to maintain the highest standards of conduct to prevent conflicts of interest in connection with the award of Commission funds or the use of FAA funds for reimbursement or payment of costs (*e.g.*, procurement of goods or services) by, or to the Recipient. A conflict of interest generally exists when an Interested Party participates in a matter that has a direct and predictable effect on the Interested Party's personal or financial interests. A conflict also may exist where there is an appearance that an Interested Party's objectivity in performing his or her responsibilities under the Project is impaired. For example, an appearance of impairment of objectivity may result from an organizational conflict where, because of other activities or relationships with other persons or entities, an Interested Party is unable to render impartial assistance, services or advice to the Recipient, a participant in the Project or to the Federal government. Additionally, a conflict of interest may result from non-financial gain to an Interested Party, such as benefit to reputation or prestige in a professional field.

### ***(B) Prohibition on Direct or Indirect Financial or Personal Benefits***

An Interested Party shall not receive any direct or indirect financial or personal benefits in connection with the award of Commission funds or its use for payment or reimbursement



of costs by or to the Recipient. Costs incurred in violation of any conflicts of interest rules contained in this section or in violation of any assurances by the Recipient may be denied reimbursement.

If you believe that a conflict of interest exists within your agency, contact your Program Manager immediately at 907-271-1414.

## **XI. DENALI COMMISSION POLICIES**

FAA's may include specific requirements related to one or more of the following formal policies that have been adopted by the Commission.

- Investment Guidance
- Sustainability
- Community Planning
- Open Door
- Private Enterprise
- Competitive Bidding
- Cost Containment

Any such specific requirements will be identified either in the FAA Special Provisions or Attachment A of the FAA.

## **XII. LAWS AND REGULATIONS**

Recipients are required to comply with all applicable Federal laws and regulations. Some potentially applicable laws and regulations are summarized below for reference.

1. 2 CFR 1326, "Non-procurement Debarment and Suspension", which generally prohibits entities that have been debarred, suspended, or voluntarily excluded from participating in Federal non-procurement transactions either through primary or lower tier covered transactions with other persons, including sub-recipients and contractors.
2. The National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2013 (Public Law No. 112-239, enacted January 2, 2013 and codified at 41 U.S.C. § 4712) includes a pilot program for whistleblower protection. It applies to all Denali Commission FAA's, sub-awards, or contracts under awards issued by the Denali Commission.

The following requirement for all FAA's implements this statute:

In accordance with 41 U.S.C. § 4712, an employee of a recipient or contractor under a FAA or sub-award may not be discharged, demoted, or otherwise discriminated

against as a reprisal for disclosing to a person or body information that the employee reasonably believes is evidence of gross mismanagement of a Federal award, sub-award, or a contract under a Federal award or sub-award, a gross waste of Federal funds, an abuse of authority relating to a Federal award or sub-award or contract under a Federal award or sub-award, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal award, sub-award, or contract under a Federal award or sub-award. Recipients and contractors under Federal awards and sub-awards shall inform their employees in writing of the rights and remedies provided under 41 U.S.C. § 4712, in the predominant native language of the local workforce.

The persons or bodies referenced above include:

- i. A Member of Congress or a representative of a committee of Congress
  - ii. An Inspector General
  - iii. The Government Accountability Office
  - iv. A Federal employee responsible for contract or grant oversight or management at the relevant agency
  - v. An authorized official of the Department of Justice or other law enforcement agency
  - vi. A court or grand jury
  - vii. A management official or other employee of the contractor, subcontractor, or Recipient who has the responsibility to investigate, discover, or address misconduct
3. No person in the United States shall, on the ground of race, color, national origin, handicap, age, religion, or sex be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. The Recipient agrees to comply with the non-discrimination requirements below, and any other applicable non-discrimination law(s).
- i. Title VI of the Civil Rights Act of 1964 (42 U.S.C. Part 200d et seq.);
  - ii. Title IX of the Education Amendments of 1972 (20 U.S.C. Part 1681 et seq.);
  - iii. The Americans with Disabilities Act of 1990 (42 U.S.C. Part 12101 et seq.);
  - iv. Section 504 of the Rehabilitations Act of 1973, as amended (29 U.S.C. Part 794);
  - v. The Age Discrimination Act of 1975, as amended (42 U.S.C. Part 6101 et seq.);
  - vi. Executive Order 13798 [“Promoting Free Speech and Religious Liberty”](#)  
[\(2 CFR 200.300\)](#)
4. To the maximum extent practicable, considering applicable laws, the Recipient shall accomplish the project contemplated by the FAA using local Alaska firms and labor.

5. No portion of this FAA may be used for lobbying or propaganda purposes as prohibited by 18 U.S.C. Section 1913 or Section 607(a) of Public Law 96-74.
6. The Recipient must comply with the following environmental requirements, and any other applicable environmental law(s):
  - i. The National Environmental Policy Act (42 U.S.C. Section 4321 et seq.). See 45 CFR 900 (Appendix C) for guidelines on how to comply with NEPA requirements for projects funded by the Denali Commission.
  - ii. The National Historic Preservation Act (16 USC 470 et seq.)
  - iii. Executive Order (EO) 11988 (“Floodplain Management”), EO 11990 (“Protection of Wetlands”) and EO 12898 (“Environmental Justice in Minority Populations and Low-Income Populations”)
  - iv. The Clean Air Act (42 USC 7401 et seq), Federal Water Pollution Control Act (33 USC 1251 et seq), and EO 11738 (“providing for administration of the Clean Air Act and the Federal Water Pollution Control Act with respect to Federal contracts, grants or loans”).
  - v. The Flood Disaster Protection Act (42 USC 4002 et seq)
  - vi. The Endangered Species Act (16 USC 1531 et seq)
  - vii. The Coastal Zone Management Act (16 USC 1451 et seq)
  - viii. The Coastal Barriers Resources Act (16 USC 3501 et seq)
  - ix. The Wild and Scenic Rivers Act (16 USC 1271 et seq)
  - x. The Safe Drinking Water Act of 1974 as amended (42 USC 300f et seq)
  - xi. The Resource Conservation and Recovery Act (42 USC 6901 et seq)
  - xii. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 SUC 9601 et seq) and the Community Environmental Response Facilitation Act (42 USC 9601 et seq)
7. The Recipient must comply with the following:
  - i. The Drug-Free Workplace Act of 1988 (41 USC 8102)
  - ii. The Fly America Act (49 USC 40118) and implementing regulations (41 C.F.R. 301-10.131 through 301-10.143)
  - iii. 15 C.F.R. Part 27 (“Protection of Human Subjects”)
  - iv. Laboratory Animal Welfare Act of 1966, as amended (7 USC 2131)
  - v. Marine Mammal Protection Act (16 USC 1361 et seq)
  - vi. The Nonindigenous Aquatic Nuisance Prevention and Control Act (16 USC 4701 et seq)
  - vii. The Trafficking Victims Protection Act of 2000 (22 USC 7104(g)). The award term required by 2 C.F.R 175.15(b) is incorporated by reference
  - viii. Build America, Buy America Act (Title IX of PL 117-58)  
***The Build America, Buy America Act is a new law that requires that all iron, steel, manufactured products, and construction materials used in federal infrastructure projects are produced in the United States.***

8. The Recipient is responsible for complying with all requirements of the Financial Assistance Award. For all Federal awards, this includes the provisions of the Federal Funding Accountability and Transparency Act (FFATA), which includes requirements on executive compensation, and also requirements implementing the Act for the recipients at 2 CFR part 25 Financial Assistance Use of Universal Identifier and Central Contractor Registration, and 2 CFR part 170 Reporting Sub-award and Executive Compensation Information.
9. Reporting of Matters Related to Recipient Integrity and Performance:

In compliance with [Appendix XII to 2 CFR part 200](#), if the recipient's total value of all currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of a Federal award, then the recipient must maintain the currency of information reported to the System for Award management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings as described in paragraph 2 of Appendix XII to 2 CFR 200.

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# APPENDIX A

## STANDARD FORM 270

*To open the form, click on the link below:*

- [Request an Advance or reimbursement for project costs: Standard Form 270](#)

## How to complete Standard Form 270

It is required that boxes **1-9, 11, and 13** be completed in order to receive reimbursement.

- Box 1a. - check “Reimbursement” or “Advance”
- Box 1b. - Check “Partial” or “Final”
- Box 2 - Check “Cash”
- Box 3 - Fill-in “Denali Commission”
- Box 4 - Input the Financial Assistance Award number. If the request is for more than one project, attach a separate sheet that shows the aggregate amounts and each project number.
- Box 5 - indicate what number this request represents.
- Box 6 - enter your employer identification number assigned by the U.S. Internal Revenue Service
- Box 7 - Place an account number or other identifying number assigned by the recipient
- Box 8 - Identify the beginning and ending day, month, and year for the reimbursement request
- Box 9 - Should contain your organization name and address
- Section 11- the most complex.

The purpose the vertical columns of (a), (b), and (c) is to provide space for separate cost breakdowns when a project has been planned and budgeted by program function or activity. Also, the summary total of all programs, functions, or activities should be shown in the “total” column.

For the horizontal columns, only (a), (c), (e), (g), (h), and (I) are required. For the majority of reimbursement requests columns (a), (b), (e), and (g) will contain the same number. This number will be the amount of expenses you have accrued on this grant as of the “to-date” in box 8. Line (h) should be the total amount of money you have been reimbursed for this grant thus far. Which means that line (I) is the amount that you are requesting reimbursement for with this request.

- Box 13 – Fill in the name, title, and phone number and signature of the Authorized Certifying Official as well as the date the request has been submitted to the Denali Commission.

Submit the completed form to [denalicommissionfinance@denali.gov](mailto:denalicommissionfinance@denali.gov).

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# APPENDIX B

## NEPA REGULATIONS

[National Environmental Policy Act \(NEPA\) Implementing Procedures and Categorical Exclusions](#)

[Denali Commission CATEX Checklist](#)- Please contact your Program Manager if you have difficulties with this form.