

Golden LEAF Foundation Food Distribution Assistance Program

Compliance Expectations

Overview

[Session Law 2021-180](#) allocated \$10 million of Coronavirus State Fiscal Recovery Funds (SFRF) from the American Rescue Plan Act (ARPA) of 2021 to the Golden LEAF Foundation, to administer the Food Distribution Assistance Program.

Golden LEAF will administer the Food Distribution Assistance Program in accordance with State law and the [US SFRF Treasury Guidance, such as the Final Rule, the FAQs, and the Compliance and Reporting Guidance](#). Food Distribution Assistance Program and associated agreements will also follow compliance requirements of the [Uniform Guidance \(2 CFR 200\)](#) and [09 NCAC 03M](#).

The purpose of this document is to provide an overview of the expectations for compliance in this program. Additional detail will be provided to organizations awarded funds in this program.

Requirements

Administration of awards is also subject to the same regulations, restrictions, and requirements as other state-funded Golden LEAF awards. These include but are not limited to [Uniform Guidance \(2 CFR 200\)](#) and [09 NCAC 03M](#).

Single Audit Requirement

Grantees must comply with [2 CFR 200.501](#) and [09 NCAC 03M .0205\(a\)\(3\) and \(b\)\(4\)](#). Grantees that receive less than a total of \$500,000 through this program will be expected to certify that the total amount of federal funds received by the organization did not exceed \$500,000.

Conflict of Interest

Grantees will be required to comply with a conflict of interest policy.

Civil Rights

Grantees will be required to ensure that they 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).

Procurement

The grantee will be expected to have a written Procurement Policy that meets the requirements specified in Uniform Guidance (2 CFR 200) and 09 NCAC 03M. The procurement procedures should promote free and open competition. Grantees must contract for the procurement of goods, services, and construction projects including design services.

Monitoring Process

Golden LEAF will monitor the project through review of regular reports received from the grant recipient, through phone/email correspondence, and through on-site monitoring visits. Additional detail regarding this process will be provided following an award.

Reporting Requirements

Golden LEAF staff will provide grantees with detailed reporting requirements when a project grantee agreement is issued.

Grantee Roles and Responsibilities

The grantee is responsible for managing the day-to-day operations of the activities funded by the award to ensure the funds are used in accordance with all program requirements and written agreements and taking action when performance problems arise. Specifically, the grantee is responsible for the following:

Management and Oversight

The organization's Board of Directors are legally, financially, contractually, and programmatically responsible for the project. The organization is responsible to the State of North Carolina and the Federal government even if they have a contract administrator or sub-recipient relationship.

Financial Management

The organization must ensure proper accounting of funds to avoid disallowed costs. This includes accurate identification of project costs and cash balances and proper internal controls.

Grant Agreement

If awarded, the organization will receive a grant agreement and funding approval from Golden LEAF. These documents are contractually binding and cannot be changed without Golden LEAF approval.

Financial Management Requirements

Golden LEAF will monitor the grantee to determine compliance with the financial management requirements. The review will determine if records are maintained in compliance with the Uniform Guidance (2 CFR 200), and State of North Carolina requirements. Typically, ledgers, invoices, canceled checks, bank statements and requisitions are reviewed to see that the grantee has an adequate system of financial management. Golden LEAF staff may also make specific requests to review information or documentation relating to financial management of a grant.

Recordkeeping Requirements

If awarded, grantees must provide access to records upon request by Golden LEAF or any state or federal agency with oversight of this program. Records must be retained for 5 years after the project closes. Financial records must comply with [2 CFR 200.302](#).