

Compliance & Readiness Worksheet

Phase 1: Pre-Award Readiness

Complete these line items before submitting your Request for Application (RFA).

1. Registration & Identifiers

- ☐ **SAM.gov Status:**
Confirm the organization has an active registration and a valid Unique Entity ID (UEI).
- ☐ **Federal Disclosures:**
Prepare and document standard governance and leadership disclosures required under federal law.

2. Legal & Governance Structure

- ☐ **Clear Decision Rights:**
Document who is legally and operationally accountable for fund deployment.
- ☐ **Hub-and-Spoke Documentation:**
If operating in a collaborative network, secure all formal Memorandums of Understanding (MOUs), letters of interest, and legal partnership agreements.

Note: If these legal documents are missing or weak at submission, the state and CMS will flag the proposal.

3. Core Financial Setup

- ☐ **Indirect Cost Rate:**
Define and document your negotiated federal indirect cost rate.
- ☐ **Shovel-Ready Verification:**
Document past programmatic success to prove the organization can hit the ground running within the first 3 months.

Phase 2: Post-Award Controls & Financial Guardrails

Deploy these operational checks to ensure compliance once funding is secured.

1. Fund Segregation & Non-Duplication

- ☐ **Ledger Isolation:**
Set up separate general ledger accounts or unique tracking codes specifically for this award.
- ☐ **Procurement Standards:**
Align internal buying processes with 2 CFR Part 200 federal procurement guidelines.
- ☐ **Subawardee Management Plan:**
Create a formal monitoring system to track compliance downstream. If passing more than \$30,000 to a partner, you are legally required to report that interaction under the Transparency Act.

The Golden Rule: Zero supplementation or "double-dipping." You cannot use these federal funds for a project already receiving federal, state, or local funding.

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2. Milestone Tracking

☐**Quarterly Milestones:**

Establish a calendar for tracking quarterly milestone goals. (e.g., California pays out based on milestone performance rather than a single upfront lump sum).

☐**Reporting Infrastructure:**

Assign dedicated team members to manage the quarterly reporting cadence and portal data entries.

Phase 3: Data Governance & Risk Mitigation

1. Privacy & Security Baseline

☐**HIPAA Evidentiary Documentation:**

If exchanging Protected Health Information (PHI) via telehealth, e-consults, or EHR modernization, compile concrete proof of training logs, policy updates, and breach notification mechanisms.

☐**Cybersecurity Verification:**

Review and document technical infrastructure protections sitting on top of the baseline HIPAA controls.

2. Legal & Governance Structure

☐**Single Audit Trigger Watch:**

If your organization receives more than \$1 Million in total federal funding, flag the entity for a mandatory comprehensive annual audit under the Single Audit Act.

☐**Record Retention Policy:**

Enforce a strict 3-year minimum record retention policy post-grant closure (keep in mind the program itself runs for 5 years).

☐**Clawback Protection:**

Establish internal validation steps to guarantee all reported metrics have an underlying "evidentiary basis" (a clear paper trail) to mitigate CMS's strict anti-fraud enforcement and fund recoupment priorities.

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