



# PANDEMIC RECOVERY OFFICE

One Capitol Hill, 4th Floor  
Providence, RI 02908-5890

Office: (401) 222-2280

*Paul L. Dion, Ph.D.*

*Director*

## Pandemic Recovery Office: SFRF Grantmaking Policy

Date of Last Revision: September 2023

### 1. Purpose

The purpose of the State Fiscal Recovery Fund Grantmaking Policy (“Policy”) is to establish the grantmaking process for State Fiscal Recovery Fund (“SFRF”) projects, which have received a waiver from the State Controller and therefore are not managed in the Grant Management System (“GMS”). The Pandemic Recovery Office (“PRO”) oversees the administration of SFRF projects and has created this Policy to ensure SFRF grantmaking is adherent to 220-RICR-20-00-2.

### 2. Applicability

The Policy applies to all SFRF Awards that involve grantmaking activities by State Agencies.

### 3. Definitions

**Funding opportunity or Solicitation** means the public-facing notification of available subaward funding, sometimes referred to as a notice of funding availability/opportunity.

**Grantmaking activity** means any activity undertaken by a State Agency to develop grant programs and materials, solicit and review applications, determine subrecipients, evaluate subrecipient risk, issue and manage subawards, monitor subrecipients, and all related financial management, reporting, compliance, and evaluation tasks.

**“Grant Management System”** means the cloud-based, enterprise-wide system for the management of all Federal financial assistance coming to the State.

**Reviewer** means a person selected by the State Agency to evaluate application materials for completeness, eligibility, and/or competitiveness. Reviewers may be State employees or other qualified individuals.

**“State Agency”** means any office, department, division, commission, board, council, or other entity of the State, including quasi-public entities.

**“Unique Entity Identifier” (“UEI”)** means the official identifier for doing business with the U.S. Government as of April 4, 2022, issued through SAM.gov.

## 4. Policy

### A. Competitive Grants and Subawards

#### *i. Public Notice of Funding Opportunity*

1. A funding opportunity notice for competitive subaward must be posted for a minimum of twenty-one (21) calendar days, or a shorter period as approved by PRO.
2. Subaward funding opportunities must include at least the following information:
  - a. A description of the nature of the grant program, including eligible activities and recipients, and the anticipated duration of the program.
  - b. Identification of the SFRF funding source(s) (appropriation) and the estimated or actual total amount of available funds.
  - c. Whether a single award or multiple awards may be made.
  - d. The maximum individual award amount to be made, if appropriate.
  - e. Encouragement of collaboration by entities for community partnerships, if appropriate.
  - f. Any additional information required by SFRF or PRO approval process.
  - g. The due date for submittal of applications and the anticipated time the awards may be made.
3. State Agencies may conduct a preapplication conference before the due date for the submittal of applications to explain the grant application requirements. Statements made at a preapplication conference are not amendments to the solicitation unless a written amendment is issued.
4. State Agencies may hold a Question and Answer (Q&A) period prior to the due date. The dates of any Q&A period shall be displayed, and any Q&A documents shall be posted in the funding opportunity.

#### *ii. Application Review Criteria and Award Decision Making*

1. The State Agency shall document in writing the criteria or factors under which applications will be evaluated for award and the relative importance of each criterion or factor.
2. Applications shall be evaluated by at least three (3) reviewers for programs issuing awards of thirty thousand dollars (\$30,000.00) or more. The State Agency has discretion in determining the number of reviewers for programs with no resulting awards of thirty thousand dollars (\$30,000.00) or more.

3. Reviewers shall be selected at the sole discretion of the State Agency.
4. The Reviewers shall review each application based solely on consistent evaluation criteria or factors applied to all applications under the program. The Reviewers shall maintain a written record of the assessment of each application, which shall include comments regarding compliance with each evaluation criteria or factor, the citation of a specific criteria or factor as the basis of each stated strength or weakness and a clear differentiation between comments based on facts presented in the application and comments based on professional judgment.
5. The Reviewers may allow applicants to make oral or written presentations regarding the scope of work, terms and conditions of the grant, budget and other relevant matters set forth in the request for grant applications. Applicants shall be accorded fair treatment with respect to any opportunity for oral or written presentations, and subsequent revisions. The Reviewers may require an applicant to revise its application to reflect information provided in an oral or written presentation.
6. Reviewers are required to disclose any real or apparent conflicts of interest. Reviewers shall comply with 2 C.F.R. § 200.318 (2022) incorporated above at § 2.4(A) of 220-RICR-20-00-2.6 and the Rhode Island Code of Ethics R.I. Gen. Laws Chapter 36-14 and 520-RICR-00-00- 1, as applicable.
7. Reviewers shall abide by the following requirements for confidentiality before, during, and after the evaluation process, unless otherwise required by law or to obtain a legal opinion:
  - a. All documents and information relating to applications (content, budget, approach to problems, staffing) are to be kept in the strictest confidence;
  - b. Impressions or judgments concerning the applications are not to be discussed or shared with anyone not officially involved with the evaluation and except for the State agency staff;
  - c. Questions about any specific proposal or the review process are to be directed to the State Agency. Under no circumstances are questions to be addressed to or discussions to be conducted with applicants, members of the public, the press, other units of State government, friends, relatives, business associates, or other reviewers not officially involved in the application process, unless authorized in writing by the State Agency;
  - d. Proceedings of review committee meetings, statements and notes of the reviewers are not to be shared with anyone except other reviewers involved in the

- application process and State Agency staff;
- e. Discussions concerning applications are to be kept confidential; and
  - f. All application and review materials printed/saved are to be shredded, deleted, or returned to the State agency upon completion of the evaluation.
8. Subaward decisions: The Reviewers shall make award recommendations to the head of the State Agency based on the reviewers' evaluations of each application. The Reviewers' recommendations may include the adjustment of the budgets of the applicants individually or collectively.
  9. The head of the State Agency, or his/her designee, may affirm, modify, or reject the Reviewers' recommendations in whole or in part. Modification of the Reviewers' recommendations may include the adjustment of the budget on any proposed award individually or on all awards by an amount or percentage. If recommendations are modified or rejected, prior to issuing tentative notice of award the head of the State Agency, or his/her designee, shall document in writing the specific justifications for the action taken.
  10. Subaward decision remedies: The head of the State Agency, or designee, may resolve protests of the award or proposed award of a grant. An appeal from a decision of the head of a State Agency or designee may be made to the Director of PRO, in accordance with the provisions of R.I. Gen. Laws § 37-2-52 and § 30-00-1.6 of this Title. The Director of PRO's decision shall be entitled to a presumption of correctness in accordance with R.I. Gen. Laws § 37-2-51 and associated Rhode Island law.

## **B. Non-Competitive Grants and Subawards**

- i. SFRF is appropriated in the State budget for specific purposes detailed in proviso language.
- ii. If the proviso language of the state budget identifies a grant recipient, the State Agency is thereby obligated to provide the grant to the named entity.
- iii. State Agencies must administer the grant using the formula specified in the proviso language or, if such a formula is not provided, develop a formula to ensure that grants are administered to **all** eligible entities.
  1. If the State Agency develops a formula, it must align with the legislative intent of the SFRF project and be approved by PRO.

## **C. Risk Assessment**

- i. Risk assessment of all subrecipients is required as detailed in 220-RICR-20-00-2.6.3 except for the "review of the self-Risk Assessment section of the Annual Organization Registration submitted by the subrecipient" as this is a function within the GMS and therefore not

applicable to SFRF.

**D. Approval Process**

- i. PRO's approval process will establish the reporting requirements of the entities receiving the grant.

**E. UEI**

- i. Any entity receiving SFRF funding **must** have a public Unique Entity Identifier ("UEI"), issued through SAM.gov as required by U.S. Treasury prior to receiving any SFRF funding.

**5. Signature**

A handwritten signature in blue ink, appearing to read "Paul Quinn", is written over a light blue horizontal line. The signature is cursive and fluid.

**Director, Pandemic Recovery Office**