



American Rescue Plan Act (ARPA) and Progressing Rural Economic Prosperity (PREP)
Fund Oversight and Monitoring Manual

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Purpose

The general procedures and standards for ARPA Infrastructure and PREP Grant Administration are designed to provide rules and program information for the American Rescue Plan Act (ARPA) and Progressing Rural Economic Prosperity Fund (PREP) programs. These procedures and standards mainly apply to project oversight, financial management, grant management, and monitoring activities. The purpose of this manual is to provide clear and standardized guidelines for monitoring infrastructure and construction projects funded through the American Rescue Plan Act (ARPA) and the state-funded Progressing Rural Economic Prosperity (PREP) allocations. The manual helps ensure that the projects are executed efficiently, within budget, and meet the intended objectives, while maintaining compliance with ARPA & PREP requirements from initiation to project close-out.

Target Audience

The primary audience for this manual includes project managers, auditors, oversight committees, construction teams, contractors, and other relevant stakeholders involved in the ARPA and PREP infrastructure projects. It serves as a reference guide for ensuring best practices in monitoring and accountability.

Authority

The Allocated **ARPA Infrastructure Program** is designed to provide necessary infrastructure development to Oklahoma communities. The Legislature of the State of Oklahoma has allocated money received by the State of Oklahoma from the American Rescue Plan Act of 2021 (ARPA) to specific infrastructure sites across the state. The Legislature awarded these funds to the Oklahoma Department of Commerce to disperse through grants to enhance industrial parks, airparks, and ports to cover costs related to water, wastewater, sewer, and broadband projects eligible under the provisions of the American Rescue Plan Act of 2021 that support sites or surrounding communities identified by the Department as having such needs.

The **PREP Infrastructure Projects Program** 150:175-1-1 is designed to provide rules and program information for the Progressing Rural Economic Prosperity Fund created in Enrolled House Bill No. 4456 of the 2nd Session of the 58th Oklahoma Legislature to fund facility upgrades, including electric, water, natural gas, sewer, fiber, site access and land remediation at industrial parks, airparks, and ports in counties not receiving funding from the Pandemic Relief Primary Source Revolving Fund or Pandemic Relief Secondary Source Revolving Fund, provided that the Oklahoma Department of Commerce distributes such funds evenly amongst the congressional districts of the state to provide statewide economic impact.

Compliance with Local, State, and Federal Laws

During the planning and execution of infrastructure projects, local zoning laws, state-level regulations, federal construction standards, and other legal requirements must be adhered to. This includes applicable labor laws (e.g., prevailing wages, union requirements), environmental laws (e.g., NEPA), and safety standards (e.g., OSHA).

Fund Allocation and Usage

The Oklahoma Department of Commerce Community Development Division (ODOC/CD/CD) has determined the procedures for ensuring that ARPA and PREP funds are allocated correctly and used exclusively for eligible

activities. This includes an emphasis on prohibiting funds from being used for non-infrastructure purposes, such as general budget deficits or unrelated projects.

Awards received through this program are intended to install industrial infrastructure into sites designated by the Legislature.

Projects using **ARPA** funds must be water and/or sewer infrastructure projects and must comply with the guidelines of *31 CFR Part 35 RIN 1505-AC77* and the Treasury's Final Rule, according to the Grant Agreement between ODOC/CD and the Oklahoma Office of Management & Enterprise Services (OMES), and all federal rules and regulations.

Projects using **PREP** funds must create economic development infrastructure design, development, and construction that support sites or surrounding communities.

Ineligible ARPA projects are those that do not comply with *31 CFR Part 35 RIN 1505-AC77*.

Ineligible PREP projects are submittals that the ODOC/CD deems do not create a feasible marketable site in compliance with the legislative funding's intent.

FUNDS IMPERMISSIBLY USED SHALL BE REPAYED BY THE COMMUNITY TO THE STATE WITHIN THIRTY (30) DAYS OF A WRITTEN REQUEST FOR REPAYMENT TRANSMITTED TO THE COMMUNITY BY THE STATE.

Project Grant Management

A partnership between ODOC/CD and the subrecipient starts with ensuring that all projects meet the eligibility criteria for the respective grant based on the funding objectives, which should include:

- Project objectives, scope, deliverables, and timelines.
- Approved budget and funding allocation.
- Roles and responsibilities for all involved parties (e.g., ODOC/CD Community Development Team, CIT, EDA, Engineering Project Management, and Construction Team).
- Key milestones and performance targets.

To ensure compliance, ODOC/CD will implement risk management strategies that may include, but are not limited to, increased reporting from all ARPA and PREP subrecipients, increased in-person and tele-meetings for open engagement and Q&A sessions.

Contract and Budget Modifications

In some cases, a budget or contract modification may be necessary due to barriers or unforeseen circumstances impacting the schedule, cost, or scope of the project.

For contract modification, ODOC/CD will review supporting documents and reasons for requesting a modification.

To initiate a Contract Modification, use the following steps:

1. Subrecipient (City of or EDA for example) initiates a modification request in [OKGrants](#).
2. Subrecipient selects type of modification: Change in Contract Date.
3. Subrecipient must input the detailed reason for the contract modification in the description box.
4. Subrecipient will upload the following documents:
 - a. Signed letter on official letterhead showing the change in contract date as an example. If a contract modification is needed, please include the date to which the contract should be extended (i.e., December 31, 2025) and the reason for needing a contract extension. Also, be sure to include a date on the letterhead.
5. Subrecipient will then change the status of the contract to Modification Submitted in OKGrants.
6. ODOC/CD will review submitted requests and supporting documentation.
7. If approved, the subrecipient must access OKGrants to sign the revised contract.

A modification that does not increase or decrease the total amount of the budget, but moves approved funding from one line to another, is considered a budget modification.

To initiate a Budget Modification, use the following steps:

1. Subrecipient (City of or EDA for example) initiates a modification request in [OKGrants](#).
2. Subrecipient selects type of modification: Budget Revision.
3. Subrecipient must input the detailed reason for the budget in the description box.
4. Subrecipient will upload the following documents:
 - a. Signed letter on official letterhead showing the change in budget.
 - b. Supporting documentation for changes in the budget (i.e., award letters, cost estimates, change order)
5. ODOC/CD will review the submitted request and change the status to Modification in Process after the subrecipient has submitted the budget modification request.
6. After the status has been changed to Modification in Process, the **Detailed Line-Item Budget** is now open for the subrecipient to make the necessary changes to the budget.
7. The subrecipient will make the appropriate budget changes in OKGrants and change the status to Modification Changes Submitted for ODOC/CD to review and process the modification.

Additional steps can be located [here](#), or visit <https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/>.

Environmental Review

ARPA Specific:

NEPA requirements do not apply to Treasury's administration of SLRF funds, under the following eligible use categories: revenue loss; public health and negative economic impacts; water, sewer, and broadband infrastructure; and emergency relief from natural disasters. Projects supported with payments from the funds may still be subject to NEPA review if they are also funded by other federal financial assistance programs or have certain federal licensing or registration requirements.

However, if the project includes funding from other federal assistance programs subject to NEPA, ODOC/CD requires the subrecipient to upload supporting environmental clearance documentation in OKGrants. Files can be uploaded using the steps found under Initiate Release of Funds found [here](#) or <https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/>.

Important Note: Funds will not be released until the environmental clearance has been approved by ODOC/CD. Please use the Release of Funds (ROF) Checklist (**Attachment C**) to upload the required documents in OKGrants.

Contact the appropriate program representative to confirm the applicability of NEPA requirements before expending any funds on the project.

Procurement

ODOC/CD must ensure adherence to all applicable local, State, and federal procurement laws and regulations. It's important to understand that when federal funds are involved in construction projects in Oklahoma, there's a blend of federal and state regulations that come into play.

Subrecipients are responsible for complying with all requirements of any federal grant award, including purchases with federal grant funds. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for federal awards can be found at 2 CFR, Part 200. Subrecipients should review these regulations and review any award-specific legislation or publications for additional required contractual provisions.

*In addition, subrecipients should include the Federal Funding Terms (**Attachment D**) in their contract language as applicable.*

[Oklahoma Public Competitive Bidding Act:](#)

This act sets out the rules for competitive bidding on public construction projects within Oklahoma. When state funds are involved, this act will apply. More information on the Oklahoma Public Competitive Bidding Act can be located here

<https://www.sai.ok.gov/Search%20FormsPubs/database/PCBA%20Handout%20Updated%209.7.22%20cw.pdf>

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[Interaction of Federal and State Regulations:](#)

When federal funds are present (i.e., ARPA), ODOC/CD and each subrecipient must carefully navigate the interplay between federal and state regulations. This often means ensuring that the procurement process meets the most stringent requirements of both sets of rules.

ARPA-funded projects in Oklahoma will need to comply with both federal procurement rules and the Oklahoma Public Competitive Bidding Act. Both are similar; however, where applicable, the subrecipient will need to integrate both, but the more stringent regulation will be used to ensure compliance with the intent of open and competitive procurement. There can be instances where federal requirements may supersede state

requirements, but generally, there is an effort to coordinate and comply with both.

For ARPA-Federally funded projects, i.e., ARPA Infrastructure; the Uniform Guidance established in 2 CFR 200.319 applies that all procurement transactions for property or services must be conducted in a manner providing full and open competition, consistent with standards outlined in 2 CFR 200.320, which allows for non-competitive procurements only in certain circumstances. Recipients must have and use documented procurement procedures that are consistent with the standards outlined in 2 CFR 200.317 through 2 CFR 200.320. In addition, the Uniform Guidance at 2 CFR 200.214, 2 CFR Part 180, and Treasury's implementing regulations at 31 CFR Part 19, prohibit subrecipients from entering into contracts with suspended or debarred parties. The procurement standards outlined in the Uniform Guidance require an infrastructure for competitive bidding and contractor oversight, including maintaining written standards of conduct. To check debarment information, please visit <https://sam.gov/>.

In summary, while federal funding brings its own set of rules, Oklahoma's Public Competitive Bidding Act remains relevant.

ARPA Projects must often adhere to both federal and state regulations, creating a layered compliance environment.

For State funded projects such as PREP, (i.e., State funded PREP grants) the Public Competitive Bidding Act of 1974 Title 61 O.S. §§ 101 – 138 is applicable:

- Applies to any public construction.
- Applies to road-construction projects.
- Applies to any repairs or construction of public buildings.

Compliance Requirements for Procurement

To ensure compliance with procurement requirements, subrecipients will be required to upload backup documentation in OKGrants in the Release of Funds section. At a minimum, backup documentation should include:

1. Bid advertisement
2. Bid tabulation
3. Bid proposal
4. Notice of Award
5. Notice to Proceed
6. Executed Contract to include federal provision as applicable
7. Debarment and Suspension Certification
8. Sole Source Justification (if applicable)

Financial Management

Payment (Draw Request including invoices for cost incurred) & Expenditure Reporting

ODOC/CD will determine whether the subrecipient is effectively administering the Federal awards ARPA funding and State Appropriated PREP funding, applying sound management practices, and administering the funds in a manner consistent with the program objectives and terms and conditions of the award.

Reimbursement Requirement

Subrecipients should be aware that this is a cost reimbursement agreement (subject to receipt of supporting documentation).

Supporting documentation includes, but is not limited to:

- Signed Purchase Order
- Invoice or Application for Payment
- Construction or Engineering Contract as applicable

OKGrants.gov is the official grant management system for payment reimbursement. The process walk-through is available in the video links for submission. [OKGrants Training - YouTube](#)

Financial Services will want payment request breakdowns in the Request for Payment section in OKGrants in the Explanation and/or breakdown of requested funds box, as follows, as an example:

Example: These are payments for May 2025 & July 2025 of \$16,000.

Therefore, the subrecipient must provide a breakdown of the \$16,000 to be reimbursed for May 2025 versus the amount being requested for July 2025.

Expenditure Report Requirement

ODOC/CD is focused on ensuring that all expenditure reports are current to avoid the presumption or appearance of cash on hand. ODOC require Subrecipients to submit monthly accrued expenditure reports within 30 days after the last day of the reporting month. **For example, July expenditures must be reported no later than August 30th.**

Contract Development

Once necessary services have been properly procured, it is time to develop the legal instruments necessary to establish contractual obligations and rights. This Policy provides general guidance concerning the compliance aspects of contract administration. As with all contractual obligations, the subrecipient is advised to seek legal counsel regarding rights, duties, obligations, and liabilities arising from these legal arrangements. ODOC/CD will also provide general advice concerning contract administration. To ensure compliance with contract development requirements, subrecipients will be required to upload backup documentation in OKGrants in the Release of Funds section. At a minimum, backup documentation should include, but not limited to:

1. Bid Bonds, Performance Bonds, and Payment Bonds
2. Executed Construction Contracts and Award Documents.
 - o Construction contracts should include the ARPA/PREP contract number shown in OKGrants.

The Subrecipient should also be concerned with both the body of the contract as well as the compliance requirements that are frequently included as exhibits to the base contract.

The following items should be included in the contract text at a minimum:

1. Parties to the agreement.
2. Project location.

3. Scope of services.
4. Financial commitments.
5. Starting and ending dates.
6. Performance schedule and milestones.
7. Contract representatives:
8. Subrecipient.
9. Construction contractor.
10. Subcontractor(s).
11. Conflict of interest.
12. Reporting requirements.
13. Suspension clause.
14. Termination clause
15. Incorporation of attached requirements
16. Federal provisions as applicable
17. Signatures.

Labor Standards Applicability

[Davis-Bacon Act](#)

The Davis-Bacon Act will apply to all ARPA projects over \$10 million.

If an ARPA project is over the \$10 million threshold, the following requirements will apply:

Subrecipients will provide ODOC/CD a Davis Bacon Payroll Compliance Certification (**Attachment E**) quarterly due by the 10th of each month after the end of each quarter along with regular quarterly reporting that, for the relevant project, all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the “Davis-Bacon Act”), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State of Oklahoma. If such certification is not provided, a recipient must provide project employment and a local impact report detailing:

- The number of employees of contractors and subcontractors working on the project;
- The number of employees on the project hired directly and hired through a third party;
- The wages and benefits of workers on the project by classification; and
- Whether those wages are at rates less than those prevailing;
- Subrecipients must maintain sufficient records to substantiate this information upon request.

A subrecipient may provide a certification that a project includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)). If the recipient does not provide such certification, the recipient must provide a project workforce continuity plan, detailing:

- How the recipient will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality construction throughout the life of the project, including a description of any required professional certifications and/or in-house training;

- How the recipient will minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the project.

Other Davis Bacon-related forms may include the Davis Bacon Review Sample Timesheet (**Attachment F**) or Davis Bacon Desk Review (**Attachment G**).

Oversight and Review Plan

Oklahoma's approach to Program and Fiscal oversight of each subrecipient utilizes a combination of intense desktop monitoring, on-site monitoring, and investigative monitoring if deemed necessary to determine compliance, as prescribed in statute.

The State may conduct a review of each subrecipient to determine compliance prior to the commencement of a monitoring review. This review would normally begin with specific information being requested from the subrecipient, which will be reviewed virtually prior to the respective review.

Oklahoma Department of Commerce (ODOC/CD) will utilize, at a minimum, at its discretion, the following methods to conduct monitoring oversight of subrecipients:

- Risk assessments (tool)
- Desk reviews (e.g., tools)
- Random sampling
- On-site visits

ODOC/CD is not restricted to using only the aforementioned methods and may incorporate other methods as determined necessary.

Monitoring and Risk Assessment:

ODOC/CD continuously conducts regular, detailed risk assessments of the project, identifying potential risks such as permitting delays, regulatory hurdles, environmental concerns, labor shortages, suppliers not responding to bidding opportunities, and right-of-way hurdles:

- ODOC/CD's strategic approach includes contingency strategies for modifying the grant as needed or providing technical assistance to evade identified risks, as well as regular updates as new risks emerge.
- Timeliness (e.g., milestones met on time or determined through communication with subrecipients and progress reporting on a monthly and quarterly basis).
- Funding/Budget vs. Expenditures (HP and OKGrants Tracking).
- Community impact (e.g., anticipated jobs created, forecasting setbacks due to Right of Way negotiations with landowners, or environmental impacts).

ODOC/CD will use project management software (e.g., OKGrants, Excel, PowerPoint project overviews, or custom-built dashboards) to monitor and report project progress via a monthly and quarterly snapshot.

In most cases, projects will be monitored at 65% expended unless ODOC/CD/CD determines that monitoring should be conducted sooner.

Monitoring Process

Onsite Monitoring

Certain activities can only be evaluated on-site. The most obvious of these is examining the State's Subrecipient files to ensure adequate documentation. The frequency and depth of such on-site monitoring are dependent on the risk factors cited above. Please review the Desk Monitoring Subrecipient Survey Checklist (**Attachment H**) to prepare for monitoring.

An on-site monitoring visit will be scheduled in advance. The chief executive officer of the State's Subrecipient and the project administrator will be notified of the date, time, location, and purpose of the visit. Upon arrival, the ODOC/CD Representative will conduct an entrance interview, reiterating the purpose of the visit and outlining files and documentation needed. Utilizing appropriate checklists, the Representative reviews the State's Subrecipient files to determine if all requirements have been met.

At the conclusion of the visit, the ODOC/CD Representative will conduct an exit interview and provide a tentative summary of the visit's results. If problems appear, the State's Subrecipient has an opportunity to provide more information or clarification.

Within twenty-one (21) days of completing the monitoring visit, the State's Subrecipient will receive a formal monitoring result(s) letter. This letter will summarize the area(s) reviewed, performance expectations, an analysis of what was discovered on-site, a conclusion or finding, and, if necessary, required State's subrecipient responses or actions.

If problems were discovered during the monitoring, the State's Sub-recipient might receive a finding of non-compliance. A finding of non-compliance is a violation of law or regulation that must be remedied. A finding can result in an immediate sanction or threat of sanction if corrective action (if appropriate and required) is not taken in a specified manner and/or timeframe. For each finding, ODOC/CD will determine if a corrective action, either to correct a past problem or to avoid future problems, must be taken by the State's Subrecipient.

If the required corrective action is not addressed in an appropriate or timely manner, ODOC/CD may impose a progressive level of sanctions, ranging from additional reporting to suspension of funding, additional special conditions, return of misspent funds, termination of the contract, or even legal action.

The monitoring letter may also include one or more concerns. These are matters that, if not properly addressed, can become findings, and can ultimately result in sanctions. Concerns are often used to point out operational or management problems or patterns of performance that could lead to larger problems later. Concerns may require some form of response on the part of the State's Subrecipient.

Desk Monitoring

ODOC/CD prioritizes this form of monitoring as a means of staying in touch with project progress and preventing problems early, thereby avoiding costly problems left unattended too long. This monitoring method is the most efficient and cost-effective way ODOC/CD can employ to meet a portion of its oversight responsibilities. The ARPA and PREP Programs will require increased desk monitoring, which may include submitting additional backup documentation for pay requests and expenditure reports.

ODOC/CD may also include data visualization tools (graphs, pie charts on PowerPoint or Excel for tracking of cash drawn and/or expenditures and project outcomes), for an at-a-glance understanding of project status as needed.

Reporting Requirements

As previously stated, ODOC/CD has a reporting process in place. The reporting element is a critical grant evaluation mechanism for determining the status of the grants/ subrecipient activities and percentage of completion and has established a standardized process for data collection and reporting.

ODOC/CD established standard reporting formats and timeframes for submission to ensure project managers, contractors, and team members operate under consistent formats and reporting schedules. These reporting requirements assist ODOC/CD staff in completing internal tracking and progress reports for in-house staff viewing and for the ultimate reporting to the Office of Management and Enterprise Services (OMES), Department of Treasury, State Legislators, or the public interest. Some of these reports include but are not limited to the following:

- Monthly Expenditure Reporting Tracking
- Quarterly Reporting

Recordkeeping Requirements

Subrecipients shall maintain and retain its financial records, supporting documents, statistical records, and all other records pertinent to this Subaward for seven (7) years from the date of submission of the Final Expenditures Report, and longer if any litigation, claims, or audit is started before the end of that seven (7) year period; in which case, records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken.

Upon request, the community shall provide access to these records to the State of Oklahoma, its agencies, agents, directors, and/or any party that has contracted with the State for the exclusive purposes of evaluating or ensuring compliance with the Allocated ARPA Funding or PREP program requirements.

At their own expense, the applicant shall prepare photocopies of all required documents and deliver said documents to the State or any of the aforementioned parties upon written request within a reasonable time of the request.

If the applicant ceases operations during this seven (7) year period, the applicant must provide photocopies of these records to the Executive Director of ODOC/CD within thirty (30) days of ceasing operations.

Failure to abide by any reporting requirement shall require the applicant to repay ARPA or PREP funds to the State of Oklahoma within thirty (30) days of a written request for repayment.

Closeout

The Subrecipient shall submit closeout documents no later than sixty (60) days after the final date of the period funded or upon completion of the project. In the event the project is not complete at the end of the contract period, no final payment will be made, and ODOC/CD may require that the Subrecipient repay in full the contracted amount if the project is not complete. After construction is complete, the subrecipient will be required to file a final report and have the project reviewed in person by a member of ODOC/CD/CD

In addition, ODOC/CD will evaluate the Final Outcome Measurement to determine whether the infrastructure improvements meet community and economic development goals as required by the legislature.

The following documents will be required to be submitted with the closeout.

- Certificate of Substantial Completion/Final Completion
- Punch List and Resolution Log
- Final Inspection Report (from engineer and/or DEQ)
- Photographs of the project (before and after)

Subrecipients will be required to submit with their closeout, the ARPA/PREP Closeout Checklist (**Attachment I**).

References

- [Department of Treasury 31 CFR Part 35; Pandemic Relief Programs](#)
- [State and Local Fiscal Recovery Funds Federal \(SLFRF\) FAQs](#)
- [2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(ARPA\)](#)
- [Progressing Rural Economic Prosperity Fund created in Enrolled House Bill No. 4456 \(PREP\)](#)
- [24 CFR, Part 85.36 \(Federal Procurement Standards\), which outlines requirements for competitive bidding, procurement procedures, and vendor selection.](#)
- [Public Competitive Bidding Act of 1974 & 61 O.S. §§ 101, et seq.](#)

Attachment List

Attachment A: Rules For Participation in the Allocated ARPA Infrastructure Program

Attachment B: Rules For Participation in the Allocated PREP Infrastructure Program

Attachment C: Release of Funds (ROF) Checklist

Attachment D: Federal Funding Terms

Attachment E: Davis Bacon Payroll Compliance Certification

Attachment F: Davis Bacon Review Sample Timesheet

Attachment G: Davis Bacon Desk Review

Attachment H: Desk Monitoring Subrecipient Survey Checklist

Attachment I: Closeout Checklist