RAN
ROCKY MOUNTAIN REGION

RAN-RM Subrecipient Contract and Invoicing Information Session

8/21/2026, 2-3PM MT

Session Overview

1. Cycle 1 retrofit implementation timeline
2. Subrecipient contracting process and required documentation
3. DOE flow-down and CU-specific terms and conditions
4. CU invoicing and cost share reporting
5. Roles and responsibilities
6. Next steps
7. Q&A session

Please hold your questions until the end of each section.

This is going to be a lot of information – our goal is to prepare you for what you will likely see in your subrecipient contract and how the invoicing process will work. The RAN-RM team is available to support you throughout the contracting and retrofit implementation process.

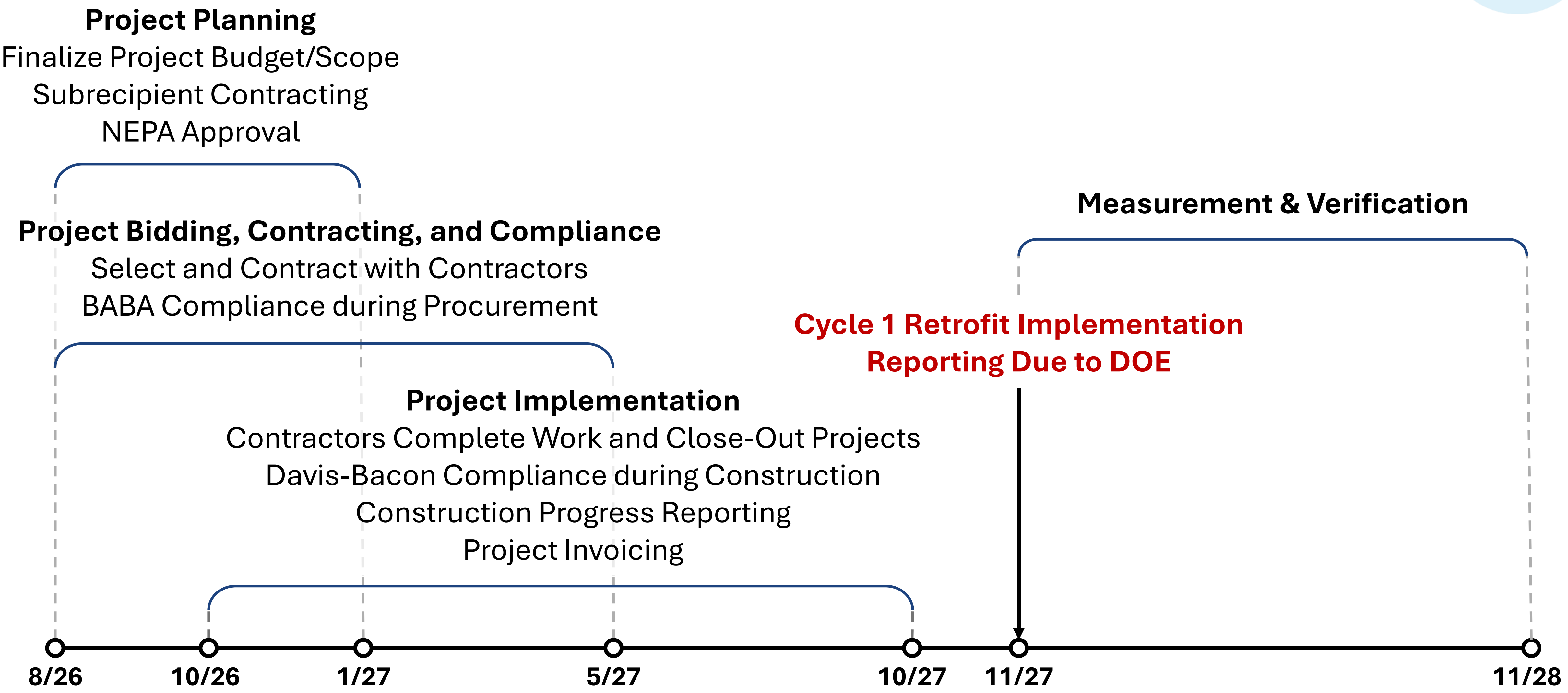
A caveat to what is being presented today:

Our team has done our best to craft this presentation to inform you of what to anticipate, but deviations from the information presented may appear in the subrecipient contract you receive and once the final invoicing/contracting procedures are implemented.

The terms & conditions that will be included in the subrecipient contracts will not be finalized until the Subcontracting Officer receives the required documentation and drafts the contracts.

Communication will be key as we embark on this journey together!

1. Cycle 1 Retrofit Implementation Timeline



This timeline is based on CU's statement of project objectives (SOPO), providing windows within which tasks must be completed.

1. Cycle 1 Retrofit Implementation Timeline

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- Cycle 1 retrofit project budgets will be included in our budget justification and approved by DOE in **two phases**.
- **Phase 1:** Includes the 8 facilities listed below, included in our budget justification at the start of budget period 2.
- **Phase 2:** Includes the 4 facilities listed below that will be added to our budget justification during the **October approval window**. Facilities located on tribal land or categorized by the state as historic were included in phase 2 due to additional approvals needed prior to inclusion on our DOE budget justification form.
- Regardless of the phase your facility is included in, please begin working on the forms and project planning now.

Cycle 1, Phase 1 Facilities:

1. Colorado Community Church
2. Community United Church of Christ
3. First United Methodist Church of Newcastle
4. Islamic Center of Boulder
5. Covenant United Methodist Church
6. Littleton United Methodist Church
7. Ogden First United Methodist Church
8. Broomfield United Methodist Church

Cycle 1, Phase 2 Facilities:

RAN-RM team submitting EQ-1, DOE requesting THPO approval

1. Kamiah Community Presbyterian Church
2. Mission Valley United Methodist Church Parsonage
3. Browning Church Annex

RAN-RM team requesting CO SHPO approval

4. Park Hill United Methodist Church

2. Subrecipient Contracting

Nonprofits will be subrecipients of the RAN-RM program grant, and must enter into contract with CU (the prime) to receive funding for implementing the retrofit projects

Subrecipient contracting process:

1. **Marketplace:** Subrecipients work with the CU CEAE Finance Team (Kristin Conway, Kristin.Conway@Colorado.EDU) and Procurement Service Center (PSC) to be added to CU Marketplace as suppliers.
2. **Budget:** Subrecipients with RAN-RM team support finalize retrofit project budget and scope.
3. **Documentation:** Subrecipients complete 3 forms (next page) and submit to CU Boulder.
4. **Subcontract Request:** RAN-RM team submits budget, budget justification, scope of work, and documentation to CU's Subcontracting Officer (Andrew Osborn, Andrew.Osborn@Colorado.EDU).
5. **Subcontracting:** The Subcontracting Officer reviews submitted documentation, conducts due diligence, drafts and distributes subrecipient agreement to each subrecipient, collects signatures.
6. **Project Planning:** Subrecipients work with RAN-RM team to finalize retrofit contractor contracts, construction timelines, Davis-Bacon system tracking onboarding, etc. CU submits info to DOE.
7. **Implementation:** Throughout construction projects, subrecipients invoice CU monthly for incurred expenses and report cost share, CU reimburses the subrecipients after invoices are approved.

2. Subrecipient Contracting

Contracting Flow

1. DOE → 2. CU Boulder → 3. Nonprofit (Subrecipient) → 4. Retrofit Subcontractor

Invoicing Flow

1. Retrofit Subcontractor $\xrightarrow{\textit{Per Construction Contract}}$ 2. Nonprofit (Subrecipient) $\xrightarrow{\textit{Monthly}}$ 3. CU Boulder $\xrightarrow{\textit{Quarterly}}$ 4. DOE

Payment Flow when Invoices are Approved

1. Retrofit Subcontractor $\xleftarrow{\textit{Per Construction Contract}}$ 2. Nonprofit (Subrecipient) $\xleftarrow{\textit{Monthly}}$ 3. CU Boulder $\xleftarrow{\textit{Quarterly}}$ 4. DOE

2. Subrecipient Contracting Documentation

To initiate the CU subrecipient contracting process, the following documents are required (responsible organization(s) listed in *italics*):

1. Retrofit Project Budget (*Nonprofits with support from RAN-RM team*)
2. Budget Justification (*RAN-RM team with support from nonprofits*)
3. Statement of Work (*RAN-RM team and nonprofits*)
    1. Detailed description of the retrofit project(s)
    2. Approximate construction schedule
    3. Deliverables/outcomes
    4. Expectations of the subrecipients
4. **Subrecipient Commitment Form (link, *Nonprofits with support from CU*)**
5. **Civil Rights Evaluation Tool (link, *Nonprofits with support from CU*)**
6. **No Audit Questionnaire (link, *Nonprofits with support from CU*)**
7. Negotiated Indirect Cost Rate Agreement (NICRA, link, *Nonprofits, as needed*)

https://www.colorado.edu/ocg/manage-awards/outgoing-subagreements

2. Subrecipient Commitment Form

Header

1. UEI Number: From SAM.gov
2. TIN: Taxpayer Identification Number from IRS
3. NAICS Code: 813110: Religious Organizations (churches, temples, spiritual groups), link
4. Proposal Title: Renew America's Nonprofits for Rocky Mountain Region
5. Prime Sponsor: Department of Energy
6. CU Boulder Principal Investigator: Moncef Krarti
7. Subrecipient PI: Main point of contact at your facility
8. Subrecipient Post Award Admin: Invoicing point of contact at your facility

Section A. Proposal Documents: Select Statement of Work and Budget and Supporting Justification

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SUBRECIPIENT COMMITMENT FORM

Subrecipient must complete this form when submitting a proposal to the University of Colorado Boulder (CU Boulder). The form provides a checklist of documents, representations and certifications as required by prime sponsors and must be signed by the Subrecipient's Authorized Official, as designated below on page 6.

Subrecipient's Legal Name:					
Street Address:					
City, State, Zip +4 / Country:					
UEI Number:		TIN:		NAICS Code:	
Congressional District:					
Proposal Title:					
Prime Sponsor:					
CU Boulder Principal Investigator:					

Subrecipient's Principal Investigator:		**Subrecipient's Post Award Administrator:**	
Name:		Name:	
Email:		Email:	
Phone:		Phone:	

SECTION A. Proposal Documents

As applicable, please check the following Subrecipient documents that are included in CU Boulder's proposal submission and covered by the certifications below.

- ☐ TECHNICAL PROPOSAL or STATEMENT OF WORK as appropriate (required)
- ☐ BUDGET OR COST PROPOSAL AND SUPPORTING JUSTIFICATION (required)
- ☐ Small Disadvantaged Business Subcontracting Plan, in agency-required format
- ☐ Biosketches of all Key Personnel, in agency-required format
- ☐ Management and Capability Assessment
- ☐ Other:

SECTION B. Representations and Certifications

1. Overhead Rates. Subrecipient certifies that the overhead rates (e.g.,Facilities & Administration, Indirect Costs, G&A, etc.) included in this proposal have been calculated based upon:

- Subrecipient's federally-negotiated indirect cost rate agreement (NICRA) for this type of work *or* a reduced F&A rate that Subrecipient hereby agrees to accept.
  - >> **If selected, Subrecipient has attached a copy of Subrecipient's NICRA or has provided a URL link to the NICRA in Comments section below.**
- Other rates. **Please specify the basis on which the rate has been calculated in Comments below.**
- Not applicable as Subrecipient includes no indirect costs.

Comments:

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2. Subrecipient Commitment Form

Section B. Representations and Certifications

1. Overhead Rates: Either Not applicable (overhead not included in budget) or Other rate, up to de minimis 15% of modified total direct cost (MTDC)

   NOTE: We are confirming with DOE if overhead can be included in RAN-RM subrecipient budgets
2. Fringe Benefit Rate: If you anticipate including personnel in your project budget, select "Other Rates" and include basis
3. Small Business Concern: No
4. Cost Sharing: Yes, including amount from your cost share letter, type is **in-kind**
5. Human Subjects: No
6. Animal Subjects: No
7. Foreign Nationals: Yes or No
8. Conflict of Interest: Subrecipient has conflict of interest policy or agrees to adopt CU's
9. DOD NIST SP800-171: Leave blank
10. Civil Rights Certification: Indicate whether you currently or will meet the requirements
11. Debarment and Suspension: For due diligence
12. Fiscal Responsibility: Ensures ability compliance with uniform guidance
13. Drug Free Workplace: Yes, required for recipients of federal funding
14. Certification Regarding Lobbying: Yes, required
15. System for Award Management (SAM.gov) certification: Yes, required
16. FAPIIS/Responsibility Matters: Review [eCFR: Appendix XII to Part 200, Title 2] to determine if this is N/A or Yes/No

Section C. Audit Status: Most likely "Subrecipient does not receive an annual audit", and you will need to complete a **No Audit Questionnaire**.

2. Civil Rights Evaluation Tool

Subagreement Number: May not have a number when completing form, can enter “Unknown”

Unique Entity ID: UEI number from SAM.gov

Does subrecipient have a nondiscrimination policy: Y/N, same question as on Subrecipient Commitment Form

Does the subrecipient have a discrimination complaint process? Y/N

Does the subrecipient have policies and procedures to ensure nondiscrimination and equal opportunity? Y/N

If your organization does not have a nondiscrimination policy statement that meets the requirements of this form, CU will require that one be put in place in order to proceed with a subrecipient contract.

CU can help in providing language that can be adopted to meet this requirement.

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CIVIL RIGHTS EVALUATION TOOL

OVERVIEW: Subrecipients who receive a Subagreement under a Prime agreement of a grant, cooperative agreement, or other award of Federal financial assistance and has been selected by the University of Colorado Boulder must complete this form and submit requested data within thirty (30) calendar days of receipt of this form.

INSTRUCTIONS: Please fill out all required (*) fields on this form. Any omissions to the required fields could delay the processing of the Subagreement.

SUBRECIPIENT ENTITY INFORMATION

Subrecipient Name*:	
Subagreement Number*:	**Unique Entity ID*:**

SUBRECIPIENT CONTACT INFORMATION

Contact Name*:	
Contact Email*:	

Choose YES or NO or N/A (if applicable) to the following questions:

Does the subrecipient have a nondiscrimination policy statement referencing Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments of Act of 1972, and Age Discrimination Act of 1975? *	**YES:** ☐	**NO:** ☐
Does the subrecipient have a discrimination complaint process? *	**YES:** ☐	**NO:** ☐
Does the subrecipient have policies and procedures used to ensure nondiscrimination and equal opportunity for persons with disabilities to participate in the benefit from the subrecipient's programs and services? *	**YES:** ☐	**NO:** ☐

AUTHORIZED OFFICIAL INFORMATION

Name*:	**Title*:**
Signature*: X____________________	**Date*:**

2. No Audit Questionnaire

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If you indicated in Section C of the Subrecipient Commitment Form that you do not receive an annual audit in accordance with 2 CFR 200.501, the No Audit Questionnaire is required.

Prime Sponsor: Department of Energy

Prime Award Number: DE-SE0001007

Project Title: Renew America's Nonprofits for Rocky Mountain Region

CU Subaward Number: Same as Subagreement Number in Civil Rights Evaluation Tool, can enter "Unknown"

1. Does your organization have its financial statements reviewed by an independent public accounting firm? If Yes, you will provide a copy of your most recent audited financial statement
2. Has an aspect of your organization been audited/inspected in the past 2 years?

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NO AUDIT QUESTIONNAIRE

Your organization has been identified as a pending subrecipient under University of Colorado Boulder's Prime Award identified below:

Prime Sponsor:	
Prime Award Number:	
Project Title:	
Subrecipient Organization/PI:	
CU Subaward Number:	

Our records indicate that you are *not* subject to OMB's Single Audit. When a potential subrecipient is not subject to a Single Audit, Subsection 200.331 ("Subrecipient Monitoring and Management/ Requirements for Pass-Thru Entities") of the Uniform Guidance (2 CFR 200) requires the University of Colorado Boulder to evaluate the subrecipient's administrative ability to properly manage federal funds before a sub agreement can be issued.

To assist CU Boulder in its review of your organization, please have the appropriate person complete this questionnaire in its entirety and email the questionnaire along with any applicable documentation, to ocgsubcontracts@colorado.edu. This form should be completed by your organization's financial officer and signed by an Authorized Official with the authority to make certifications/acknowledgements on behalf of the organization and legally bind the organization to contractual obligations. The information provided will be reviewed and you will be contacted with any questions or requests for additional information. Please note that no sub agreement can be issued until satisfactory documentation has been received, including the organization's most recent financial statements.

If you have any questions, or if your organization is subject to OMB's Single Audit, please contact ocgsubcontracts@colorado.edu. A response to every question is required.

1. Does your organization have its financial statements reviewed by an independent public accounting firm?

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2. Other than financial statements, has any aspect of your organization's activities been audited/inspected within the past two years by a government/regulatory agency or independent public accountant?

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2. No Audit Questionnaire

3. Does your organization have a negotiated federal indirect cost/F&A rate? Same as Section B1. Overhead Rates answer
4. Will the subcontractor adhere to CASB regulations (FAR Part 30)? Y/N
5. Does the subcontractor have a financial management system that provides records that can identify the source and application of funds for award supported activities (FAR 52.216-7)? Y/N
6. Does the subcontractor have a financial management system that provides for the control and accountability of project funds, property, and other assets? Y/N
7. Does the subcontractor have a formal, written personnel policy that addresses: Pay Rates & Benefits, Time and Attendance, Leave, Discrimination, and Conflict of Interest? Y/N
8. Describe the method that the subcontractor uses to support labor and benefit charges.
9. Formal written travel policy? Y/N
10. Formal written purchasing procedure? Y/N
11. Does the subcontractor maintain an inventory system for Government property that identifies purchase date, cost, vendor, description, serial number, location, and ultimate disposition data (FAR Part 45)? Y/N
12. Entity Type: Nonprofit Organization
13. Entity Years in Operation

14-16: Federal funding amount, federal subagreements, and collaborations with CU Boulder?

2. No Audit Questionnaire

The subrecipient hereby certifies as follows:	Yes/No
Subrecipient's financial system is in accordance with generally accepted accounting principles	--
Subrecipient has the capability to identify in its accounts all federal awards, including flow- through funds, received and expended and from which federal agency they were received	--
Subrecipient maintains internal controls to assure federal awards are being managed in compliance with applicable laws, regulations, and the provisions of contracts, grants, and subawards	--
Subrecipient financial system includes budgetary controls that preclude incurring obligations in excess of (a) total funds made available under the award and (b) total funds made available for a budget cost category (e.g. personnel, travel, etc.)	--
Subrecipient can prepare appropriate invoices, financial reports and statements, including a schedule of expenditures by federal award	--
There are no outstanding audit findings that would impact CU Boulder's funding. (If there are relevant findings, please submit a copy of the most recent report that describes the finding and the steps being taken to correct it)	--
Personnel who have the responsibilities of spending, managing, and accounting for the funds awarded are familiar with the applicable cost principles (OMB Circular A-21, FAR part 31.2, etc.) and are able to determine whether costs in connection with federal grants and contracts can be considered to be allocable, allowable, reasonable, and necessary	--
Subrecipient has adequate separation of responsibilities so that no one individual has complete authority over an entire financial transaction	--
Subrecipient is in compliance with applicable federal law and public policy requirements (such as law and policies governing objectivity in research, civil rights, environmental impact, debarment and suspension, lobbying with federal funds, etc.)	--
Subcontractor will make every effort to be in compliance with all requirements of award.	--

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2. Retrofit Project Budgets

It is important that we finalize retrofit project budgets and cost share budgets <u>as soon as possible</u> to move forward with the subrecipient contracts

Budget details to start figuring out now:

1. **Contractor quotes:** Ensure that quotes are for a Davis-Bacon and BABA compliant project
2. **Cost share (20% of total project budget):** Remember that cost share can be in-kind services provided to the project or donations of equipment/services to the project that will not be reimbursed by CU
3. **Indirect Costs:** We are in the process of confirming with DOE if indirect costs are allowable for subrecipient projects. We will update everyone once this is confirmed.
    1. If indirect costs are allowable and you do not have a federally negotiated indirect cost rate, the de minimus rate will apply (15%).
    2. Budgeting for indirect costs is not required, as these costs could reduce the funding available for project implementation.

3. DOE Flow-Down Requirements

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CU's contract with the DOE stipulates that the terms & conditions flow-down to our subrecipients, including:

Compliance with Federal, State, and Municipal Law: The Recipient is required to comply with applicable federal, state, and local laws and regulations for all work performed under this Award. The Recipient is required to obtain ***all necessary federal, state, and local permits, authorizations, and approvals*** for all work performed under this Award.

NEPA Requirements: DOE must comply with the National Environmental Policy Act (NEPA) prior to authorizing the use of federal funds. DOE has made a conditional NEPA determination for this Award, and federal funding for certain tasks under this Award is contingent upon the final NEPA determination.

National Historic Preservation Act: DOE must consider the effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act (NHPA). Section 106 applies to historic properties that are listed in or eligible for listing in the National Register of Historic Places.

Requirement for Registration in the System for Award Management (SAM) : Unless the Recipient is exempted from this requirement under 2 CFR 25.110, the ***Recipient must maintain the currency of its information in SAM until the Recipient submits the final financial report required under this Award or receive the final payment, whichever is later.*** This requires that the Recipient reviews and updates the information at least annually after the initial registration, and more frequently if required by changes in its information or another award term.

3. DOE Flow-Down Requirements

CU's contract with the DOE stipulates that the terms & conditions flow-down to our subrecipients, including:

Buy America Requirement for Infrastructure Projects: Buy America Preference, Buy America Requirement, or Domestic Content Procurement Preference Requirement means a requirement that no amount of funds made available through a program for federal financial assistance may be obligated for an infrastructure project unless—(A) all iron and steel used in the project are produced in the United States; (B) the manufactured products used in the project are produced in the United States; or (C) the construction materials used in the project are produced in the United States.

Davis-Bacon Act Requirements: All laborers and mechanics employed by the recipient, subrecipients, contractors or subcontractors in the performance of construction, alteration, or repair work in excess of $2,000 on an award funded directly by or assisted in whole or in part by funds made available under this Award shall be paid wages at rates not less than those prevailing on similar projects in the locality, as determined by the Secretary of Labor in accordance with Subchapter IV of Chapter 31 of Title 40, United States Code commonly referred to as the "Davis-Bacon Act" (DBA). The recipient must comply with all Davis-Bacon Act requirements.

3. DOE Flow-Down Requirements

CU's contract with the DOE stipulates that the terms & conditions flow-down to our subrecipients, including:

Allowable Costs: SCEP determines the allowability of costs in accordance with 2 CFR Part 200 as amended by 2 CFR Part 910. All project costs must be allowable, allocable, and reasonable. The Recipient must document and maintain records of all project costs, including, but not limited to, the costs paid by federal funds, costs claimed by its subrecipients and project costs that the Recipient claims as cost sharing, including in-kind contributions.

Subrecipient Indirect Costs: The Recipient must ensure its subrecipient's indirect costs are appropriately managed, have been found to be allowable, and comply with the requirements of this Award and 2 CFR Part 200 as amended by 2 CFR Part 910.

Government Initiated Audits: The Recipient must provide any information, documents, site access, or other assistance requested by SCEP, DOE or federal auditing agencies (e.g., DOE Inspector General, Government Accountability Office) for the purpose of audits and investigations.

Cost Sharing: The ***Recipient must provide its required "Cost Share" amount as a <u>percentage of the total project costs</u> in each invoice period for the duration of the project period.*** Specifically, the cumulative cost share percentage provided to date on each invoice received must reflect, at a minimum, the cost sharing percentage specified in the Award on a budget period basis.

3. DOE Flow-Down Requirements

CU's contract with the DOE stipulates that the terms & conditions flow-down to our subrecipients, including:

Equipment/Supplies: Subject to the conditions provided in 2 CFR 200.313, title to equipment (property) acquired under a federal award will conditionally vest upon acquisition with the non-federal entity. The non-federal entity cannot encumber this property and must follow the requirements of 2 CFR 200.313 before disposing of the property...When equipment acquired under a federal award is no longer needed, the non-federal entity must obtain disposition instructions from DOE or pass-through entity. See 2 CFR 200.314 for requirements pertaining to supplies acquired under a federal award.

Site Visits: SCEP's authorized representatives have the right to make site visits and conduct Recipient Administrative Organizational Reviews to review the project and management control systems and to provide technical assistance, as appropriate. The Recipient must provide, and must require its subrecipients and contractors to provide, reasonable access to facilities, office space, resources, and assistance for the safety and convenience of the government representatives in the performance of their duties.

3. Uniform Guidance

2 CFR Part 200 – Uniform Guidance

References to 2 CFR Part 200, as amended by 2 CFR Part 910 – commonly referred to as "Uniform Guidance" – appear throughout the terms & conditions.

Compliance with Uniform Guidance is required by DOE for both the CU and subrecipients.

A few notable compliance requirements:

1. Project Bidding:
    1. Micro-purchases (<$2,000): Can be made without competitive quotes
    2. **Simplified Acquisition ($2,000-$250,000): Informal procurement methods require price or rate quotes from an adequate (at least 3) number of qualified sources**
        1. **Note: Sole-source justification may be pursued if it is not feasible to acquire 3 quotes**
    3. Sealed Bids (>$250,000): Bids must be publicly solicited from an adequate number of known suppliers, giving sufficient time for response.
2. Equipment/supplies acquisition and disposal requirements
3. Record retention requirements
4. Audit requirements
5. Conflict of interest requirements

The forms you are filling out for the subrecipient contract help CU understand your ability to meet the requirements of uniform guidance. CU can provide support and guidance where possible and will implement procedures to ensure compliance and auditability of the project.

3. NEPA and NHPA

Compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) are required by DOE.

It is primarily the responsibility of the CU to ensure NEPA compliance.

1. It is CU Boulder's responsibility to submit quarterly NEPA logs that include descriptions of all project activities for each quarter.
2. CU Boulder has a "NEPA Determination" letter from DOE describing activities that are excluded from NEPA review (Bounded Categories), and we inform NEPA of grant activities that fall within these categories. Activities that fall outside the Bounded Categories require additional NEPA review, but this is unlikely for RAN-RM projects.
3. Once anticipated construction-related activities are reported, NEPA will review the reported bounded categories and provide approval for the activities.
4. **NEPA approval must be received prior to the start of any RAN-RM supported construction activities.**
5. NHPA: For facilities located on tribal land or categorized as historic at the federal, state, or local level, approval from the relevant historic preservation office will be required. For facilities on the national historic register, DOE programmatic agreements with SHPO offices may allow retrofitting historic buildings without SHPO approval.

3. Davis-Bacon Act (DBA)

Compliance with the Davis-Bacon Act is required by DOE.
CU, subrecipients, and retrofit contractors must collaboratively ensure compliance.
LCP Tracker is the software tool we will use for DBA compliance.

1. CU is responsible for managing the LCP Tracker projects and reviewing/certifying weekly timesheets submitted by retrofit contractors. CU will coordinate with the DOE DBA team to add retrofit contractors to LCP Tracker. On request from DOE, CU will conduct job-site interviews.
2. Subrecipients are required to include DBA compliance as part of their retrofit contractor contracts, including payment of prevailing wages in the county where construction will occur (CU can provide). In the event retrofit contractors do not submit weekly timesheets to LCP Tracker, subrecipients will be required to assist CU in reminding retrofit contractors to submit timesheets.
3. Retrofit contractors will be required to go through LCP Tracker contractor training and onboarding processes and submit weekly timesheets. Retrofit contractors are required to pay prevailing wages for the county where construction will occur and post prevailing wages at the work-site. Retrofit contractors are required to accommodate job-site interviews.

3. Build America, Buy America (BABA)

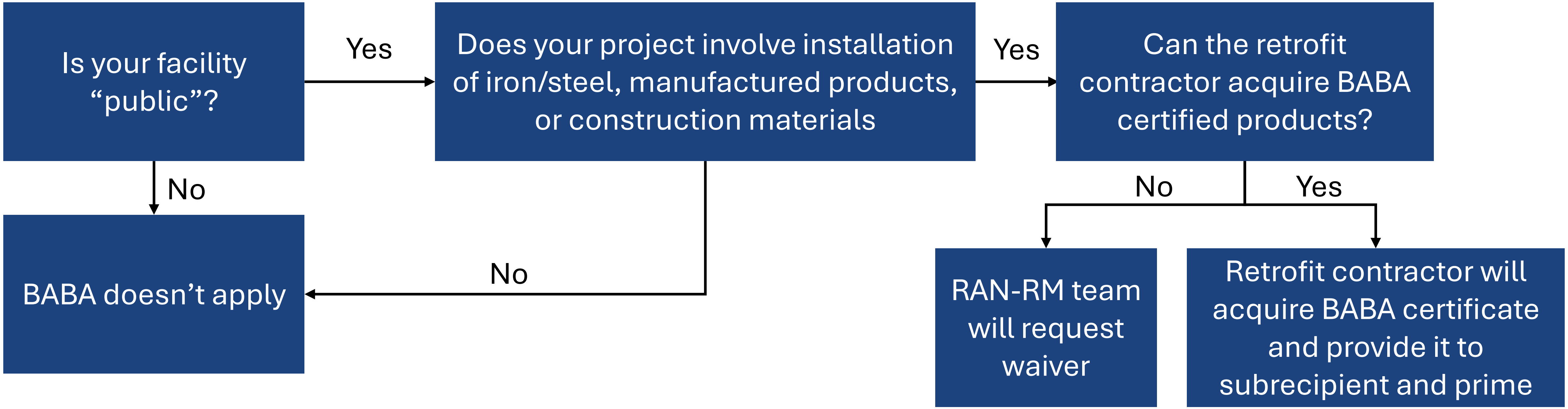
Compliance with the BABA is required by DOE.
CU, subrecipients, and retrofit contractors must collaboratively ensure compliance.

1. BABA applies to “public” infrastructure projects, including facilities that are privately owned but utilized primarily for a public purpose, i.e., operated on behalf of the public or is a place of public accommodation. **Places of worship are categorized as public as it relates to BABA.**
2. No funds may be used for an infrastructure project unless:
    1. All **iron and steel** used in the project is produced in the United States—this means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States;
    2. All **manufactured products** used in the project are produced in the United States—this means the manufactured product was manufactured in the United States; and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product.
    3. All **construction materials** are manufactured in the United States—this means that all manufacturing processes for the construction material occurred in the United States.
3. BABA only applies to those articles, materials, and supplies that are consumed in, incorporated into, or permanently affixed to the infrastructure in the project. BABA does not apply to tools, equipment, supplies brough to construction site and removed after completion of the project.
4. BABA does not apply to equipment and furnishings that are not an integral part of the structure or permanently affixed to the infrastructure project.

3. Build America, Buy America (BABA)

5. Recipients must certify or provide equivalent documentation for proof of compliance that a good faith effort was made to solicit bids for domestic products used in the infrastructure project under this award.
6. **Certificates of Compliance:** Recipients must maintain certifications or equivalent documentation for proof of compliance that those articles, materials, and supplies that are consumed in, incorporated into, affixed to, or otherwise used in the infrastructure project, not covered by a waiver or exemption, are produced in the United States. The **certification or proof of compliance must be provided by the suppliers or manufacturers** of the iron, steel, manufactured products and construction materials and flow up from all subawardees, contractors and vendors to the recipient. Recipients must keep these certifications with the award/project files and be able to produce them upon request from DOE, auditors or Office of Inspector General.
7. **Waivers:** When necessary, recipients may apply for, and DOE may grant, a waiver from the Buy America Requirement. Waivers must be based on one of the following justifications:
    1. Public Interest- Applying the Buy America Requirement would be inconsistent with the public interest;
    2. Non-Availability- The types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality;
    3. Unreasonable Cost- The inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25 percent.

3. Build America, Buy America (BABA)



3. CU Reporting Requirements

The Statement of Project Objectives (SOPO) for this project includes project-related reporting requirements that subrecipients will need to support the prime in completing.

CU is responsible for the completion of SOPO tasks. Subrecipients are responsible for acquiring and providing project-related information to CU.

1. A construction schedule, provided by retrofit contractors, for every project must be submitted to DOE prior to the start of any construction activities and updated in the event of delays.
2. The prime and subrecipients are required to complete a quality control final inspection on the last day of scheduled crew work to assess completion of the project and quality of the work.
3. The prime must submit the following to DOE to close out each project – subrecipients are required to support the prime in collecting this information:
    1. Itemized labor and material invoice per project (submitted with invoices to CU)
    2. Subrecipient satisfaction survey form
    3. Passing final quality control inspection form
    4. Copy of the contractor license for each project (submitted prior to construction to CU)
    5. Before and after pictures of the installed retrofits, including exterior photos of the building
    6. Contractor assurance and guarantee of work form (submitted prior to construction to CU)
    7. Contractor final release and wavier of lien form (submitted upon completion to CU)

3. Measurement & Verification (M&V)

The final step in the retrofit project process is to confirm the performance of the retrofits over 12 months through a process called Measurement & Verification.

CU is responsible for the completion of M&V, with support from subrecipients.

1. The prime (CU) will conduct retro-commissioning to ensure retrofits were executed as specified, including on-site testing and walkthrough audits, prior to the completion of construction projects.
2. M&V Option C (whole-facility method) or D (calibrated computer simulation method) will be used to measure the actual energy savings and carbon reductions resulting from the retrofits. **These methods require subrecipients to provide utility bills and support collection of on-site measurements, as needed, by the prime.**

3. DOE Storytelling

Upon completion of the retrofit projects, DOE would like to interview at least 3 subrecipients.
CU is responsible for connecting DOE with at least 3 subrecipients to request interviews.
<u>Subrecipients are not required to take part in interviews</u>, but it is encouraged to help tell your stories about involvement with the RAN-RM program.

1. If you agree to be interviewed, DOE representatives would like to arrange a 30-minute interview to capture and document the RAN-RM program's impact and key outcomes.
2. Again – <u>you are not required to be interviewed</u>, but if you are interested in participating in this phase of the project, please let us know!

4. CU Marketplace

CU Marketplace is the university's procurement system where vendors, invoices, and procurement contracts are tracked and managed.

Subrecipients must be added to CU Marketplace as suppliers to invoice for reimbursement.

- Information regarding becoming a CU Supplier and instructions for registering as a supplier is available here: https://www.cu.edu/psc/doing-business-cu/becoming-supplier
- Our department finance team will submit a request to add each subrecipient as a Marketplace supplier to CU's Procurement Service Center (PSC)
- **If you have not already, please send us the contact name, email, and phone number for the person at your organization who will handle invoices and can provide us a W-8/W-9.** They will coordinate with Kristin Conway from our department finance team to get setup in Marketplace

4. CU Invoicing

Subrecipients will submit invoices for incurred project expenses and report cost share monthly.

1. CU's procurement service center (PSC) will provide invoicing instructions once subrecipient contracts are added to CU Marketplace
2. Subrecipients will submit invoices monthly to apinvoice@cu.edu and cc ceaefinance@colorado.edu, moncef.krarti@colorado.edu, and nicholas.clements@colorado.edu
3. CU will provide an invoicing template that will include all required fields. Using the template is not required.
4. CU developed an internal invoice approval process that includes the CEAE department finance team, PI/PM, cost share accountant, PSC, and the grant accountant. Once invoices are approved, reimbursement will be routed to your organization.
5. CU will track invoiced expenses and reported cost share for each project. **Subrecipients must also track expenses and cost share to ensure project budgets are not exceeded, cost share commitments are met, and uniform guidance requirements are met**

4. Cost Share Reporting

Subrecipients must include cost share reporting on every monthly invoice.
Link to Cost Share Information Session Slides

1. Once your project budget is finalized, we will need to update your cost share commitment letter. We require cost share of **at least 20%** of the total project budget up to a federal share of $200,000.
   1. **Example: Federal share is $200,00, cost share is $50,000, total project budget is $250,000**
2. **If the federal share exceed $200,000 (therefore cost share exceeds $50,000), all exceedance must be paid by subrecipients as cost share.**
   1. Example: Project is $500,000, federal share is $200,000 and cost share is $300,000
3. Per the DOE flow-down clause: The Recipient must provide its required "Cost Share" amount as a percentage of the total project costs in each invoice period for the duration of the project period.
   1. You may over-report cost share to get ahead of the reporting requirement.
   2. Subrecipients meeting or exceeding their cost share cadence (20% of invoiced expenses per quarter) is critical for CU to meet our own cost share reporting requirements to DOE.
4. CU will provide a cost share reporting template that must be submitted with each invoice.

5. Roles & Responsibilities

RAN-RM

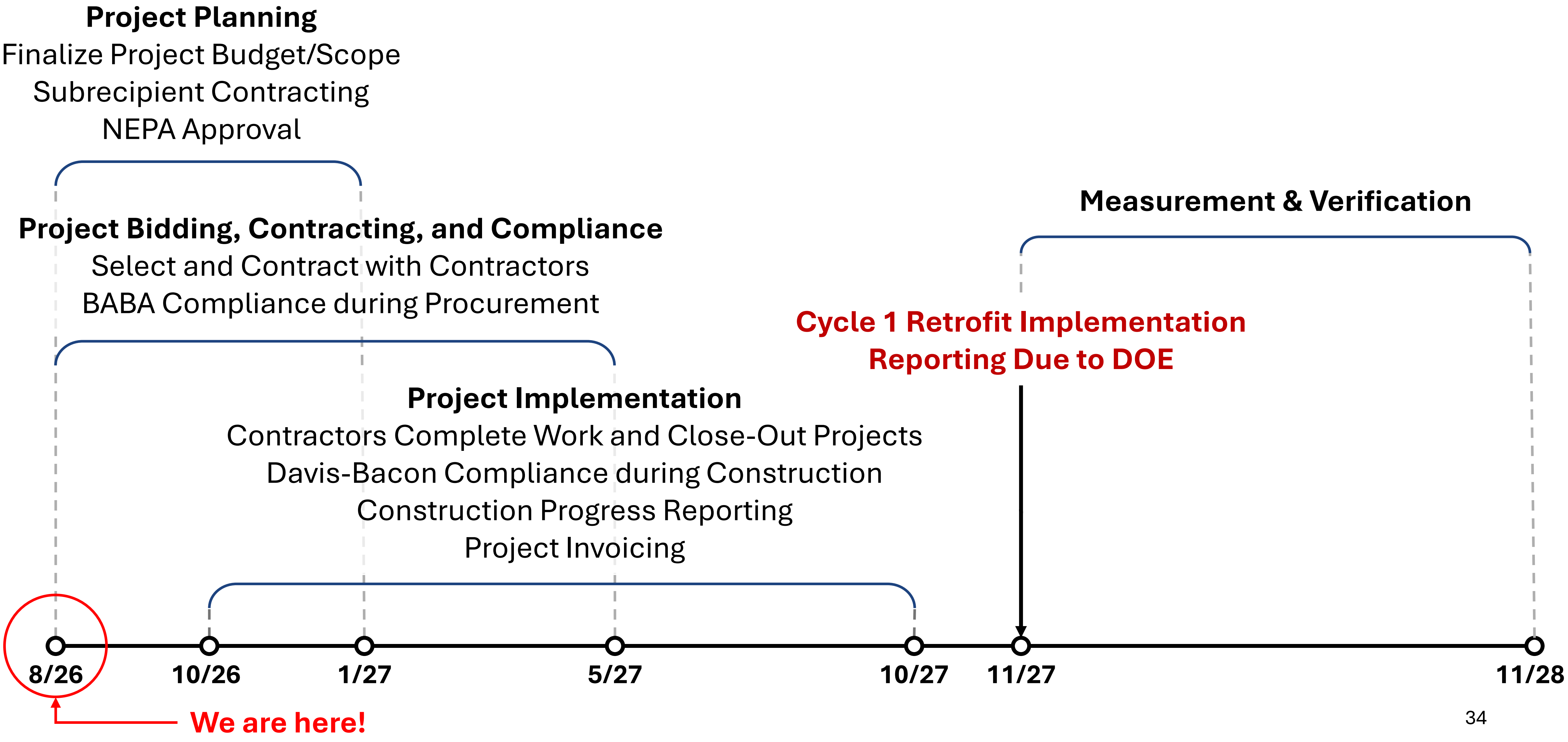
Requirement	CU Responsibility	Subrecipient Responsibility	Retrofit Contractor Responsibility
Contracting	Must contract with subrecipients, must comply with DOE contract	Must contract with retrofit contractors, must comply with subrecipient contract	Must comply with construction contract, including following all permitting requirements
Uniform Guidance	Must fully comply	Must fully comply	None
NEPA	Must submit quarterly logs and receive approval prior to construction	Cannot begin construction until prime receives NEPA approval	Cannot begin construction until prime receives NEPA approval
NHPA	Must assess historic status of subrecipient facilities, must receive approval from historic preservation offices as needed prior to construction	If historic preservation office approval is required, must support prime in determining project scope for requesting approval	None
DBA	Must review and certify weekly timesheets in LCP Tracker, must add contractors to LCP Tracker w/ DOE support, may conduct job-site interviews	Must require retrofit contractors comply with DBA in contract, must support CU in subcontractor compliance and communication	Must submit weekly timesheets, must pay and post prevailing wages, must go through LCP Tracker contractor onboarding and training, must comply with job-site interviews
BABA	Must ensure compliance by subrecipient and retrofit contractor, must provide DOE certificates of compliance or request waivers, must assess applicability	Must ensure compliance by retrofit contractor and request certificates of compliance to be provided to prime or notify prime of need for a waiver, must support prime in assessing applicability	Must provide subrecipient certificates of compliance or notify subrecipient of need for a waiver
DOE Reporting	Must submit close-out documentation, must conduct final quality control inspect, must conduct retro-commissioning	Must support CU in close-out documentation gathering, final quality control inspection, and retro commissioning	Must provide relevant close-out documentation, must comply with final quality control inspection and retro-commissioning, must address issues identified during inspection prior to close-out
M&V	Must conduct M&V for 12 months after retrofit implementation is complete	Must support prime in M&V data collection	None
Invoicing and Cost Share	Must review and approve subrecipient invoices monthly, must track project budgets and cost share, must submit reports and invoices DOE at least quarterly	Must submit invoices to CU monthly, including cost share reporting, must be added to CU Marketplace	Must submit invoices to subrecipient per retrofit contractor contract

6. Next Steps

DOE is in the process of approving our continuation application to proceed to Budget Period 2.
We will notify you once this approval is received, as this is when we can officially initiate the subrecipient contracting process. Our goal at this point is to do as much as we can to prepare for when we proceed to BP2.

1. **CU Marketplace:** Send us the contact name, email, and phone number for the financial point of contact for your organization
2. **Contractor Quotes:** Retrofit contractor quotes (and contracts) must include requirements for Davis-Bacon Act and BABA compliance. If these requirements were not included in your initial quotes, new quotes will need to be requested to ensure accurate budgeting, as DBA compliant projects tend to more expensive that non-DBA projects. If you cannot acquire 3 quotes, please let us know and we can discuss sole-source justification.
3. **Final Project Budget:** Coordinate with Eric Ohene to begin drafting a project budget that includes retrofit project quotes and other line items. CU can provide a template budget if needed.
4. **Subrecipient Contract Forms:** Start working through the Subrecipient Commitment Form, No Audit Questionnaire, and Civil Rights Evaluation Tool.
    1. Note that if updating your nondiscrimination policy requires board approval, the sooner this is on their radar the better!
5. **Cost Share:** Once your project budget is finalized, prepare an updated cost share commitment form and cost share budget detailing in-kind services and donated equipment/services that will make up the 20% of the project budget.

Questions?


Project Planning
Finalize Project Budget/Scope
Subrecipient Contracting
NEPA Approval
Project Bidding, Contracting, and Compliance
Select and Contract with Contractors
BABA Compliance during Procurement
Project Implementation
Contractors Complete Work and Close-Out Projects
Davis-Bacon Compliance during Construction
Construction Progress Reporting
Project Invoicing
Measurement & Verification
Cycle 1 Retrofit Implementation Reporting Due to DOE
8/26
10/26
1/27
5/27
10/27
11/27
11/28
We are here!