



United States Department of the Treasury
Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE Act)
Operational Self-Assessment (OSA)

OMB Approval No. 1505-0250

On July 6, 2012, the President signed the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE Act) into law. The Act establishes a Trust Fund in the Treasury of the United States, known as the Gulf Coast Restoration Trust Fund. Under the terms described in the Act, amounts in the Trust Fund will be available for programs, projects, and activities that restore and protect the environment and economy of the Gulf Coast region.

The Act gives Treasury several roles in administering the Trust Fund. For the Direct Component and Centers of Excellence Research Grants Programs, Treasury is responsible for determining eligibility and monitoring compliance with other requirements in the RESTORE Act and federal laws and policies applying to grants.

As part of the requirements under the RESTORE Act Guidance, you must complete the attached operational self-assessment (OSA). The OSA focuses on operational internal control areas and will be used, in part, to assist Treasury in determining an appropriate compliance monitoring protocol. The OSA is not intended to provide guidance regarding compliance or audit requirements, but simply as a data gathering tool.

Please email your completed responses to RESTOREAct@treasury.gov.

Organization Information			
Entity Name			
OSA Completed By			
Job Title			
Contact Details	Email		Phone number
Entity Address			
Date OSA Completed			
Comments			

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 1505-0250. Comments concerning the time required to complete this information collection, including the time to review instructions, search existing data resources, gathering and maintaining the data needed, and completing and reviewing the collection of information, should be directed to the Department of the Treasury, RESTORE Act Program, 1500 Pennsylvania Ave., NW, Washington, DC 20220.

Self-Assessment Questions		
Environment		
Questions	Please respond “YES” or “NO”	Comments
1. Does management promote open communications throughout the organization and effectively provide information to employees and other stakeholders?	Y <input type="checkbox"/> N <input type="checkbox"/>	
2. Does management model and support ethical behavior?	Y <input type="checkbox"/> N <input type="checkbox"/>	
3. Is adequate training and supervisory oversight provided to all employees to ensure that the organization effectively carries out its programs and activities, including employees working on federal grant programs?	Y <input type="checkbox"/> N <input type="checkbox"/>	
4. Are policies, procedures and processes regularly reviewed, updated and created to ensure that the organization effectively carries out its programs and activities, including updates that may be needed for federal grant funds?	Y <input type="checkbox"/> N <input type="checkbox"/>	
5. Does the organization periodically assess and maintain proper segregation of duties?	Y <input type="checkbox"/> N <input type="checkbox"/>	
6. Is there a written code of conduct that is reviewed and signed off by employees at least annually?	Y <input type="checkbox"/> N <input type="checkbox"/>	
7. Is there a written conflict of interest policy that is reviewed and signed off by employees at least annually?	Y <input type="checkbox"/> N <input type="checkbox"/>	
8. Is anti-fraud awareness training conducted at least annually that is evidenced by attendance sheets or other mechanisms?	Y <input type="checkbox"/> N <input type="checkbox"/>	
9. Are there formal policies and procedures in place for employees to confidentially report suspected violations of policies and or suspected instances of fraud or other criminal activity, including specifically those related to federal grant programs?	Y <input type="checkbox"/> N <input type="checkbox"/>	
10. Are breaches of policy and/or instances of fraud or other criminal activity addressed by management? Including taking steps to prevent future violations? Does the policy include notification to the appropriate federal agency in cases of confirmed fraud related to federal funds?	Y <input type="checkbox"/> N <input type="checkbox"/>	
11. Does the organization complete criminal and financial background checks on employees?	Y <input type="checkbox"/> N <input type="checkbox"/>	

Self-Assessment Questions		
Risk Assessment		
Questions	Please respond "YES" or "NO"	Comments
12. Does the organization have a formalized internal control program and risk assessment methodology for managing and monitoring operational and financial risks that is periodically tested and updated as needed?	Y <input type="checkbox"/> N <input type="checkbox"/>	
13. Does the organization maintain a formalized compliance program for managing and monitoring risks associated with regulatory compliance?	Y <input type="checkbox"/> N <input type="checkbox"/>	
14. Does the organization have a formalized risk assessment process in place specifically for federal grant programs, including standard forms and checklists, for assessing subrecipient eligibility and monitoring performance?	Y <input type="checkbox"/> N <input type="checkbox"/>	
Objectives		
<p>Questions 15-26 relate to compliance requirements, specifically the control objectives outlined in the OMB Circular A-133 Compliance Supplement 2014, Part 6 -- Internal Control, which can be downloaded online at http://www.whitehouse.gov/omb/circulars. This supplement is updated annually and can be found at the same website.</p> <p>Please confirm that internal controls, including written policies, procedures, processes, systems and reporting exist to provide reasonable assurance that the following objectives will be met for the RESTORE Act funds:</p>		
Questions	Please respond "YES" or "NO"	Comments
15. Allowable / Unallowable Activities & Costs - An effective system of internal controls exists to provide reasonable assurance that federal awards are expended only for allowable activities and that the costs of goods and services charged to federal awards are allowable and in accordance with the applicable cost principles.	Y <input type="checkbox"/> N <input type="checkbox"/>	
16. Cash - An effective system of internal controls exists to provide reasonable assurance that the (1) drawdown of federal cash is only for immediate needs, (2) reimbursement is requested only after costs have been incurred, (3) States comply with applicable Treasury agreements, and (4) recipients limit payments to subrecipients to immediate cash needs.	Y <input type="checkbox"/> N <input type="checkbox"/>	
17. Davis-Bacon Act - An effective system of internal controls exists to provide reasonable assurance that contractors and subcontractors were properly notified of the Davis-Bacon Act requirements and the required certified payrolls were submitted to the non-federal entity.	Y <input type="checkbox"/> N <input type="checkbox"/>	
18. Eligibility - An effective system of internal controls exists to provide reasonable assurance that only eligible individuals and organizations receive assistance under federal award programs and that subawards are made only to eligible subrecipients.	Y <input type="checkbox"/> N <input type="checkbox"/>	

Self-Assessment Questions		
19. Equipment & Real Property - An effective system of internal controls exists to provide reasonable assurance that proper records are maintained for equipment acquired with federal awards, equipment is adequately safeguarded and maintained, disposition or encumbrance of any equipment or real property is in accordance with federal requirements, and the federal awarding agency is appropriately compensated for its share of any property sold or converted to non-federal use.	Y <input type="checkbox"/> N <input type="checkbox"/>	
20. Matching, Level of Effort, Earmarking - An effective system of internal controls exists to provide reasonable assurance that matching, level of effort, or earmarking requirements are met using only allowable funds or costs which are properly calculated and valued.	Y <input type="checkbox"/> N <input type="checkbox"/>	
21. Availability - An effective system of internal controls exists to provide reasonable assurance that federal funds are used only during the authorized period of availability.	Y <input type="checkbox"/> <input type="checkbox"/> N	
22. Procurement, Suspension & Debarment - An effective system of internal controls exists to provide reasonable assurance that procurement of goods and services are made in compliance with the provisions of 2 CFR 200 (formerly the A-102 Common Rule or OMB Circular A-110, as applicable), and that covered transactions (as defined in the suspension and debarment common rule) are not made with a debarred or suspended party.	Y <input type="checkbox"/> N <input type="checkbox"/>	
23. Program Income - An effective system of internal controls exists to provide reasonable assurance that program income is correctly earned, recorded, and used in accordance with the program requirements.	Y <input type="checkbox"/> N <input type="checkbox"/>	
24. Real Property Acquisition & Relocation - An effective system of internal controls exists to provide reasonable assurance of compliance with the real property acquisition, appraisal, negotiation, and relocation requirements.	Y <input type="checkbox"/> N <input type="checkbox"/>	
25. Reporting - An effective system of internal controls exists to provide reasonable assurance that reports of federal awards submitted to the federal awarding agency include all activity of the reporting period, are supported by underlying accounting or performance records, and are fairly presented in accordance with program requirements.	Y <input type="checkbox"/> N <input type="checkbox"/>	
26. Subrecipient Monitoring - An effective system of internal controls exists to provide reasonable assurance that federal award information and compliance requirements are identified to subrecipients, subrecipient activities are monitored, subrecipient audit findings are resolved, and the impact of any subrecipient noncompliance on the pass-through entity is evaluated. Also, the pass-through entity should perform procedures to provide reasonable assurance that the subrecipient obtained required audits and takes appropriate corrective action on audit findings.	Y <input type="checkbox"/> N <input type="checkbox"/>	

Self-Assessment Questions		
Information & Communication		
Questions	Please respond “YES” or “NO”	Comments
27. External and internal Communication channels are established between organization and (1) federal agency (2) state agencies (3) sub-recipients and (4) contractors and vendors and (5) other stakeholders.	Y <input type="checkbox"/> N <input type="checkbox"/>	
28. Information related specifically to federal fund awards, including grant agreements, program guidelines, legal requirements, required reporting and other requirements are communicated to relevant internal and external stakeholders.	Y <input type="checkbox"/> N <input type="checkbox"/>	
29. Information systems and accounting systems are in place and designed to meet all federal program requirements, including reporting requirements.	Y <input type="checkbox"/> N <input type="checkbox"/>	
30. Information systems policies and procedures exist for the safeguarding of data, including personally identifiable information (PII), authorization and addition of system users, termination of user rights, information back-up and recovery, and retention and destruction of data.	Y <input type="checkbox"/> N <input type="checkbox"/>	
31. The organization performs vulnerability, penetration and disaster recovery testing on IT and data storage systems and has documented these processes and testing outcomes.	Y <input type="checkbox"/> N <input type="checkbox"/>	
32. Access to data, including PII, is protected against unauthorized access and is limited to appropriate individuals based on job functions.	Y <input type="checkbox"/> N <input type="checkbox"/>	
Monitoring		
Questions	Please respond “YES” or “NO”	Comments
33. Are the associated grant fund operations regularly assessed by an internal auditor, Inspector General and external audit function (A-133)?	Y <input type="checkbox"/> N <input type="checkbox"/>	
34. Does the organization formally respond to all internal audit, Inspector General and external audit findings in writing and make timely corrections?	Y <input type="checkbox"/> N <input type="checkbox"/>	
35. Does management periodically review all reports, deliverables, expenditures, and other requirements related to federal grant programs to ensure that guidelines and requirements are being met?	Y <input type="checkbox"/> N <input type="checkbox"/>	