# Grants to States Site Visit Checklist

Date(s) of Site Visit:

Program Officer:

## General Information

1. State Name

2. State Population

3. State Population Year

4. Number of Counties

5. Number of Public Libraries

6. Number of School Libraries

7. Number of Academic Libraries

8. Number of Special Libraries

9. Number of Tribal Libraries

10. Number of State Library Administrative Agency (SLAA) Staff (Total FTE)

11. State Fiscal Year begins

12. State Fiscal Year ends

13. Types of libraries eligible for LSTA Grants to States subawards:

Public

School

Academic

Special

Tribal

Other (please specify)

N/A

14. Additional comments:

### General Information: SLAA Staff Information

Name Date of Hire (for this position)

15. State Librarian

16. LSTA Coordinator

17. Fiscal Officer

### General Information: Additional Materials

Please upload and/or link to:

* Names and titles of all SLAA staff affiliated with the LSTA Grants to States program.
* Current SLAA organization chart.
* Current job description for LSTA coordinator showing LSTA as well as other duties.

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### General Information: Discussion Prompts (to be discussed during the site visit)

* *How are libraries organized in the state (county, parish, region, districts, systems, etc.)?*
* *What level of engagement does the SLAA have with non-public libraries? What kinds of libraries can the SLAA legally work with?*
* *Tell us more about the SLAA’s staffing levels, responsibilities, and position within the state’s government structure.*

## Legal Authority and Compliance with Federal Law

### Legal Authority and Compliance: Statutory Authority

18. What is the citation for the state law that designates the SLAA as "the official agency of   
 a state charged by the law of the state with the extension and development of public library   
 services throughout the state." (20 U.S.C. § 9122(4)) A URL to the citation and/or an excerpt is   
 preferred.

19. Has the state certified that the SLAA has the fiscal and legal authority and capability to   
 administer all aspects of the Grants to States program?

Yes

No

### Legal Authority and Compliance: Assurances and Certifications

20. Does the SLAA have signed copies of the following current assurances/certifications/required   
 forms?

State Legal Certifying Official

Yes

No

Assurances - Non-Construction Programs

Yes

No

Assurances and Certifications for most recent grant award (including nondiscrimination,   
 prohibitions against lobbying, etc.)

Yes

No

Five-Year Plan Assurances

Yes

No

Internet Safety Certification (if the SLAA functions as a public library)

Yes

No

N/A

If no, please explain:

21.The above forms signify compliance with federal statutes and regulations. How is the SLAA   
 ensuring compliance with these federal requirements in its grant-funded programs? *Additional   
 guidance on the below compliance policies can be found in the* [*Grants to States Manual*](https://www.imls.gov/grants/grant-programs/grants-states/grants-states-manual)*.*

* Nondiscrimination
  + Race, color, or national origin (Title VI of the Civil Rights Act of 1964)
  + Sex (Title IX of the Education Amendments of 1972)
  + Disability (Section 504 of the Rehabilitation Act of 1973)
  + Age (Age Discrimination Act of 1975)
* Debarment and Suspension
* Drug-Free Workplace
* Conflict of Interest Safeguards
* Restrictions Regarding Lobbying
* Any other applicable requirements

22. Does the SLAA have written procedures for ensuring compliance with anti-discrimination laws,   
 including processes for reviewing civil rights-related complaints?

Yes

No

23. Does the SLAA have a written policy on services to persons with Limited English Proficiency?

Yes

No

24. Does the SLAA have a written policy on ensuring access for individuals with disabilities?

Yes

No

### Legal Authority and Compliance: Additional Materials

Please upload and/or link to:

* Written policies (or those of the state that are applicable to the SLAA) for civil rights, including complaint procedures, Limited English Proficiency access, and disability access (corresponds to items 22-24).

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### Legal Authority and Compliance: Discussion Prompts (to be discussed during the site visit)

* *Are there any concerns about staffing levels, training, etc. related to the SLAA’s capacity to administer all aspects of the Grants to States program?*
* *Are there any questions or concerns about the required IMLS certifications/assurances?*

## Administrative Activity

25. Does the SLAA have current, written procedures used by staff to administer the Grants to   
 States program?

Yes

No

If yes, please upload and/or link to the procedures.

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26. How does the SLAA train staff to work with the Grants to States program?

27. What entity is responsible for keeping the SLAA’s SAM registration active?

28. What is the SLAA's records retention policy, including timeframes? Does it meet/exceed federal   
 guidelines for the Grants to States program?

Please upload and/or link to the records retention policy/guidelines.

Attach File (file limit: 40MB)

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29. How are records stored, and which staff are responsible for records?

Active records (describe):

Inactive records (describe):

30. Does the SLAA have complete project files/documentation for SLAA/statewide projects,   
 including applications, budgets, awards, reports, invoices, purchase orders, etc.?

Yes

No

Please upload and/or link to:

* Examples of complete project files/documentation for statewide projects.
* Examples of public relations for LSTA-funded statewide projects.

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31. Does the SLAA have written procedures for addressing complaints or concerns about the way   
 Grants to States funds are used/administered/distributed?

Yes

No

If yes, please upload and/or link to the complaint procedures.

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32. If applicable, how have any complaints been resolved?

33. Are any complaints pending?

Yes

No

If applicable, please upload any complaint file(s) related to the Grants to States program.

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### Administrative Activity: Discussion Prompts (to be discussed during the site visit)

*If there are written grants administration procedures, what approach did the SLAA take to capturing these processes? If there are not written procedures, what are the barriers?*

*How many staff are trained to handle various aspects of the Grants to States program? Is the LSTA Coordinator the sole individual responsible for preparing the State Program Report (SPR)?*

### Administrative Activity: State Advisory Council and Grants Review

34. Does the SLAA have an advisory council? If yes, what is its role, and is it involved in the   
 decision process for LSTA funding distribution?

35. Who has the final decision on LSTA funding?

36. How does the SLAA ensure that conflicts of interest are accounted for in grant   
 review/recommendations/decisions?

### Administrative Activity: State Advisory Council and Grants Review: Discussion Prompts (to be discussed during the site visit)

* *How does the advisory council or other governing authority engage with the SLAA’s Five-Year Plan, if at all?*
* *Does the SLAA have other advisory groups, whether related to LSTA or not?*

### Administrative Activity: Subrecipients

37. Does the SLAA make subawards?

Yes

No

If no, jump to item 45.

38. Does the SLAA provide subrecipients with a manual or written guidance for administering their   
 grants? If yes, how often is the content revisited for updates?

Please upload and/or link to:

* Information related to the subaward cycle, including announcement of funding availability and application deadlines; application forms and instructions; announcement of grants awarded; and information on grant reporting and due dates.
* Written guidance for subrecipients such as manuals, boilerplates, assurances, and other binding commitments used in the grant program.

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39. How does the SLAA evaluate each subrecipient's risk of noncompliance with federal statutes,   
 regulations, and the terms and conditions of the subaward?

40. Does the SLAA ensure that all subrecipients have a Unique Entity Identifier (UEI), which is   
 different from a full SAM registration?

Yes

No

41. Does the SLAA use the FFATA Subaward Reporting System (fsrs.gov) for any subawards greater   
 than $30,000, and if yes, what is the timeline and/or process for entering data into fsrs.gov?

42. What methods are used to assure that all applicable federal requirements, which are outlined   
 in the SLAA’s signed annual award certifications, are included in subawards and that   
 subrecipients are aware of these requirements? (For example: nondiscrimination, debarment   
 and suspension, prohibitions against lobbying)

Signed forms/documentation

Training

Website

Other (please specify)

Additional comments:

43. How does the SLAA monitor subrecipient compliance with federal requirements?

In-Person

Virtual

Other (please specify)

Additional comments:

44. Does the SLAA have complete project files/documentation for subrecipient projects, including   
 applications, budgets, awards, reports, invoices, purchase orders, etc.?

Yes

No

Please upload and/or link to:

* Examples of complete project files/documentation for subrecipient projects.
* Examples of public relations for LSTA-funded subrecipient projects.

Attach File (file limit: 40MB)

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### Administrative Activity: Subrecipients: Discussion Prompts (to be discussed during the site visit)

* *Are the subawards formula-based vs. open-ended? Prescribed vs. grassroots? Materials vs. project grants?*
* *Are they open to all eligible libraries, or more targeted?*
* *Does the applicant pool reflect a broad spectrum of the state’s libraries?*
* *Describe the application review process, if applicable.*
* *What are the approaches, tools, software, etc. the SLAA uses to manage the subawards program?*

### Administrative Activity: Five-Year Plan

45. How, and how often, is the SLAA monitoring and evaluating the Five-Year Plan?

46. How is the SLAA working with other state agencies (where appropriate) to coordinate resources, programs, and activities, and leverage, but not replace:

* The federal and state investment in the Elementary and Secondary Education Act
* The Head Start Act
* The Workforce Investment Act
* Other federal programs and activities that relate to library services, including economic and community development and health information (20 U.S.C. §9134(b)(6))

### Administrative Activity: Five-Year Plan: Discussion Prompts (to be discussed during the site visit)

* *Please tell us about overall progress to date towards meeting the Five-Year Plan goals.*
* *How would the SLAA define the critical partners related to the Five-Year Plan? What is the approach to communicating with them about the Plan’s progress, challenges, etc.?*
* *Have there been, or is there intent to make any substantive changes to the Five-Year Plan?*

## Financial Activity

### Financial Activity: 4% Administration

47. What types of costs, if any, are included in the SLAA’s 4% administrative project, which then   
 appear in the Financial Status Report (FSR)? (If not applicable, jump to item 50.)

48. If the SLAA has a statewide cost allocation plan (SWCAP), how is the SLAA working with the state   
 to ensure that no more than 4% of LSTA funds are supporting administrative costs?

49. How does the SLAA track administrative costs, and how frequently does this occur?

Please upload and/or link to:

* Documentation that illustrates how the 4% administrative costs are determined/tracked (spreadsheets, policy documents, etc.; include any relevant budget codes/labels).

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### Financial Activity: Match

50. What are the SLAA's general sources of funding for Match (i.e., project-related costs in the   
 SPR), whether State or Other (local sources, donations, corporations, foundations)? Are there   
 any significant sources of Match worth highlighting?

51. If applicable, how are the values of in-kind Match contributions determined? (note that in-kind   
 Match is not required)

52. What categories of library services comprise the SLAA’s Match?

Please upload and/or link to:

* Documentation that illustrates how the SLAA’s Match is determined/tracked (spreadsheets, policy documents, etc.; include any relevant budget codes/labels).

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53. Does the SLAA require Match funds from subrecipients? If yes, what is the approach?

54. What is the SLAA’s process for assuring that Match expenditures follow the same allowable cost   
 principles as LSTA funds?

### Financial Activity: Maintenance of Effort (MOE)

55. What SLAA budget categories are used to make up the Maintenance of Effort (i.e., general   
 library expenditures that reflect LSTA Purposes)?

Please upload and/or link to:

* Documentation that illustrates how the Maintenance of Effort (MOE) funds are determined/tracked (spreadsheets, policy documents, etc.; include any relevant budget codes/labels).

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Financial Activity: Maintenance of Effort (MOE): Discussion Prompts (to be discussed during the site visit)

* *Are there concerns about meeting MOE in the current budget structure/state environment?*
* *What is the approach to ensuring consistency in MOE calculation/reporting each year?*
* *State budgets are rarely static. Is there periodic assessment of the MOE formula to ensure that “all State dollars expended by the State library administrative agency for library programs that are consistent with the purposes of [LSTA]” (excluding capital expenditures, special one-time project costs, or similar windfalls)? (see* [*Match and MOE requirements*](https://www.imls.gov/sites/default/files/matchandmoerequirementsmemo.pdf)*, 20 U.S.C. § 9133 (c)(2))*

### Financial Activity: Audit

56. Have there been any audit findings or questioned costs related to the SLAA’s implementation   
 of the Grants to States program in the last five years? If yes, briefly describe the findings and   
 corrective actions taken.

Please upload and/or link to:

* Any audit statements or reviews conducted for the Grants to States program, if applicable.

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57. Does the SLAA provide IMLS with the relevant sections of audits with any findings or   
 questioned costs?

Yes

No

N/A

58. Does the SLAA have a process for resolving audit exceptions? If yes, please describe.

59. Does the SLAA continue to update IMLS about the status of prior audit findings until further   
 corrective action has been taken?

Yes

No

N/A

### Financial Activity: Audit: Discussion Prompts (to be discussed during the site visit)

* *In general, what is the character of the compliance environment in which the SLAA operates?*
* *If applicable, how does the SLAA and finance staff communicate about matters related to audits?*

### Financial Activity: SLAA and Financial Office

60. How often do the SLAA program staff and financial office staff communicate with each other   
 and cross-check financial data?

61. How does the financial office monitor SLAA financial data, in general, and specifically LSTA   
 funds? (For example: managing MOE and Match, differentiating funding sources, staying   
 within allowable spending periods, etc.)

62. What is the internal approval process before a payment request is sent to IMLS via eGMS   
 Reach?

63. Does the SLAA typically request advances or reimbursements of funds? What is the basis for   
 that decision?

64. If the SLAA or its subrecipients receive advances, do they report the liquidation of the   
 advances within 30 days? What are the procedures for minimizing the time elapsing   
 between receipt and expenditure of funds?

65. Does the SLAA have procedures in place for determining the allowability and allocability of   
 costs (including administrative costs), particularly when more than one funding stream is   
 involved? How are these procedures communicated and carried out?

66. Are LSTA funds obligated within the designated federal two-year grant period, and liquidated   
 by the report deadline, in order to fully reconcile federal spending?

67. At any given time, the SLAA may have multiple federal fiscal year LSTA awards to spend. How   
 does the SLAA separately track and report on these allotments?

Please upload and/or link to:

* Example(s) of tracking multiple LSTA allotments (spreadsheets, etc.; include any relevant budget codes/labels.

Attach File (file limit: 40MB)

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68. Who has responsibility for preparing and submitting the quarterly grant accrual report to IMLS?

69. If the SLAA or subrecipients collect program income from LSTA-funded projects, is it being   
 used to further program objectives, or is it being used in a different manner? Additionally,   
 has prior approval been requested from IMLS?

### Financial Activity: SLAA and the Finance Office: Discussion Prompts (to be discussed during the site visit)

* *What is the organizational structure of the finance office in relation to the SLAA? Are they in the same office? Does the finance office serve multiple departments?*

### Financial Activity: Personnel

70. If the SLAA is using LSTA funds for staff salaries/benefits, are there adequate records to   
 track personnel costs, particularly if staff members work on both LSTA and non-LSTA funded   
 projects?

Please upload and/or link to:

* Example(s) of methods used to track personnel costs.

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### Financial Activity: Procurement

71. Does the SLAA ensure that procurement practices meet federal regulatory requirements,   
 such as domestic preferences for purchases (2 CFR 200.322)? Please provide details.

### Financial Activity: Equipment

72. Does the SLAA routinely obtain prior approval from IMLS before allowing LSTA funds to be   
 used to purchase equipment that costs $5,000 or more? (as defined in 2 CFR 200.1; this   
 includes purchases made by both the SLAA and subrecipients)

Yes

No

N/A

73. If applicable, what are the SLAA’s procedures for managing equipment purchased with LSTA   
 funds, and do they adhere to federal standards, such as taking an inventory every two years (2   
 CFR 200.313)?

## Wrap Up

74. Additional comments and/or questions:

75. SLAA staff who contributed responses to the questions:

### Wrap Up: In-Person Visit Additional Materials

Please upload and/or link to:

* Site visit agenda.
* List of people and their titles whom IMLS staff will meet at the SLAA and other sites.
* Files for projects that will be visited.

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