

**CDBG INTERNAL CONTROL AND FINANCIAL MANAGEMENT FORM - NEW PROJECT**

This form should be completed as part of the Special Conditions process, prior to any funds being drawn for the grant. Please answer the following questions to the best of your knowledge; should the internal control or financial management processes change throughout the course of the grant, please reach out to SENDD to have this form updated.

**1. Internal Controls**

- a) Identify the procedures and processes that will be used to review and approve invoices or billings for payment:

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- b) Identify all individuals who will be responsible for processing payments. Include full name and title:

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## **2. Financial Management**

- a) Will funds from the State of Nebraska be wired electronically ACH to the local government's designated account? If yes, please complete the attached W-9 & ACH Enrollment Form.  
☐ Yes ☐ No
- b) Will accounts used to hold CDBG funds be interest-bearing? Please note that funds deposited into an interest-bearing account must be transferred immediately (1-3 business days) to a non-interest-bearing account in order to be in accordance with CDBG regulations.  
☐ Yes ☐ No
- c) Advancement or Reimbursement: which of the following procedures does the Local Unit of Government plan to follow regarding paying invoices?  
☐ The Local Unit of Government has enough funds on hand and plans to pay all invoices immediately, prior to requesting funds from DED (reimbursement).  
☐ The Local Unit of Government plans to request funds from DED prior to paying invoices (advancement). Only Public Works and Public Planning projects are eligible for advancement. Please note that advanced funds (funds received from DED prior to paying invoices) must be disbursed to the vendor and cleared of the Local Unit of Government's account within 5 business days of receipt in order to be in accordance with CDBG regulations.
- d) Will financial records be reconciled?  
☐ Yes ☐ No  
i. Who will perform the reconciliation? Include full name and title:  
  

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ii. How often will the reconciliation occur?  
  

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- e) Does the Local Unit of Government track expenses on an accrual-basis or cash-basis?  
☐ Accrual-basis: the Local Unit of Government accounts for revenue and expenses when they are earned/accrued.  
☐ Cash-basis: the Local Unit of Governments accounts for revenue and expenses when they are received/expended.
- f) Prior to implementing the project, does the Local Unit of Government have Program Income on hand?  
☐ Yes ☐ No  
i. If the answer is yes, please provide a copy of the Re-use Plan and Program Guidelines from the project generating Program Income.

ii. Will the Program Income be invested/applied to this project? \_\_\_\_\_

g) Will this specific grant generate Program Income?

☐ Yes ☐ No

i. If yes, how will Program Income be generated? \_\_\_\_\_

### **3. Acknowledgment of Compliance with Federal Internal Control Standards**

I, as the Chief Elected Official of \_\_\_\_\_ (the recipient or subrecipient of Federal funds), acknowledge compliance with the following Federal Internal Control Standards, as established in 2 CFR 200.303 (eff. October 1, 2024):

The recipient and subrecipient must:

- (a) Establish, document, and maintain effective internal control over the Federal award that provides reasonable assurance that the recipient or subrecipient is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should align with the guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control-Integrated Framework" issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- (b) Comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal award.
- (c) Evaluate and monitor the recipient's or subrecipient's compliance with statutes, regulations, and the terms and conditions of Federal awards.
- (d) Take prompt action when instances of noncompliance are identified.
- (e) Take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information. This also includes information the Federal agency or pass-through entity designates as sensitive or other information the recipient or subrecipient considers sensitive and is consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

Signed:

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Chief Elected Official Signature

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Chief Elected Official Printed Name, Title

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Date