# U.S. DEPARTMENT OF EDUCATION
BUDGET INFORMATION NON-CONSTRUCTION PROGRAMS

OMB Control Number: 1894-0008
Expiration Date: 09/30/2023

Name of Applicant Organization American Samoa Government Governor ESF Grant Award # S425H200002

Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form.

**SECTION A - BUDGET SUMMARY U.S. DEPARTMENT OF EDUCATION FUNDS**

| Budget Categories | Project Year 1 (a) | Project Year 2 (b) | Project Year 3 (c) | Project Year 4 (d) | Project Year 5 (e) | Project Year 6 (f) | Project Year 7 (g) | Total (h) |
|---|---|---|---|---|---|---|---|---|
| 1. Personnel | | | | | | | | |
| 2. Fringe Benefits | | | | | | | | |
| 3. Travel | | | | | | | | |
| 4. Equipment | 100,000 | | | | | | | |
| 5. Supplies | 17,438 | | | | | | | |
| 6. Contractual | | | | | | | | |
| 7. Construction | 7,154,753 | | | | | | | |
| 8. Other | | | | | | | | |
| 9. Total Direct Costs (lines 1-8) | | | | | | | | |
| 10. Indirect Costs *Enter Rate Applied: | | | | | | | | |
| 11. Training Stipends | | | | | | | | |
| 12. Total Costs (lines 9-11) | 7,272,191 | | | | | | | |

***Indirect Cost Information** ***(To Be Completed by Your Business Office)*:

If you are requesting reimbursement for indirect costs on line 10, please answer the following questions:

(1) Do you have an Indirect Cost Rate Agreement approved by the Federal government? ____Yes ____No. Not Applicable; not charging Indirect Costs

(2) If yes, please provide the following information and provide a copy of your Indirect Cost Rate Agreement:
Period Covered by the Indirect Cost Rate Agreement: From: ___/___/______ To: ___/___/______ (mm/dd/yyyy) Not Applicable
Approving Federal agency: ____ED ____Other (please specify): ______________________ The Indirect Cost Rate is _________%

(3) If this is your first Federal grant, and you do not have an approved indirect cost rate agreement, are not a State, Local government or Indian Tribe, and are not funded under a training rate program or a restricted rate program, do you want to use the de minimis rate of 10% of MTDC? ____Yes ____No. If yes, you must comply with the requirements of 2 CFR § 200.414(f).

(4) If you do not have an approved indirect cost rate agreement, do you want to use the temporary rate of 10% of budgeted salaries and wages? ____Yes ____No. If yes, you must submit a proposed indirect cost rate agreement within 90 days after the date your grant is awarded, as required by 34 CFR § 75.560. Not Applicable

(5) For Restricted Rate Programs (check one) -- Are you using a restricted indirect cost rate that:___ Is included in your approved Indirect Cost Rate Agreement? Or ___ Complies with 34 CFR 76.564(c)(2)? The Restricted Indirect Cost Rate is _________%

(6) For Training Rate Programs (check one) -- Are you using a rate that: ____Is based on the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4))? Or ____Is included in your approved Indirect Cost Rate Agreement, because it is lower than the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4)).

| Name of Applicant Organization | Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form. |
|---|---|

**SECTION B - BUDGET SUMMARY**
**NON-FEDERAL FUNDS**

| Budget Categories | Project Year 1 (a) | Project Year 2 (b) | Project Year 3 (c) | Project Year 4 (d) | Project Year 5 (e) | Project Year 6 (f) | Project Year 7 (g) | Total (h) |
|---|---|---|---|---|---|---|---|---|
| 1. Personnel | | | | | | | | |
| 2. Fringe Benefits | | | | | | | | |
| 3. Travel | | | | | | | | |
| 4. Equipment | | | | | | | | |
| 5. Supplies | | | | | | | | |
| 6. Contractual | | | | | | | | |
| 7. Construction | | | | | | | | |
| 8. Other | | | | | | | | |
| 9. Total Direct Costs (Lines 1-8) | | | | | | | | |
| 10. Indirect Costs *Enter Rate Applied: | | | | | | | | |
| 11. Training Stipends | | | | | | | | |
| 12. Total Costs (Lines 9-11) | | | | | | | | |

**SECTION C – BUDGET NARRATIVE** (see instructions)

| Name of Applicant Organization | Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form. |
|---|---|

**IF APPLICABLE: SECTION D – LIMITATION ON ADMINISTRATIVE EXPENSES**

**(1) List administrative cost cap (x%): _____**
**(2) What does your administrative cost cap apply to? __ (a) indirect and direct costs or __ (b) only direct costs**

| Budget Categories | Project Year 1 (a) | Project Year 2 (b) | Project Year 3 (c) | Project Year 4 (d) | Project Year 5 (e) | Project Year 6 (f) | Project Year 7 (g) | Total (h) |
|---|---|---|---|---|---|---|---|---|
| 1. Personnel Administrative | | | | | | | | |
| 2. Fringe Benefits Administrative | | | | | | | | |
| 3. Travel Administrative | | | | | | | | |
| 4. Contractual Administrative | | | | | | | | |
| 5. Construction Administrative | | | | | | | | |
| 6. Other Administrative | | | | | | | | |
| 7. Total Direct Administrative Costs (lines 1-6) | | | | | | | | |
| 8. Indirect Costs *Enter Rate Applied: | | | | | | | | |
| 9. Total Administrative Costs | | | | | | | | |
| 10. Total Percentage of Administrative Costs | | | | | | | | |

**General Instructions**

This form is used to apply to individual U.S. Department of Education (ED) discretionary grant programs. Unless directed otherwise, provide the same budget information for each year of the multi-year funding request. Pay attention to applicable program specific instructions, if attached. You may access the Education Department General Administrative Regulations cited within these instructions at: https://www.ecfr.gov/cgi-bin/text-idx?SID=0b63ce6f20caccbf480e5596fdf289e3&mc=true&tpl=/ecfrbrowse/Title34/34cfr75_main_02.tpl. You may access requirements from 2 CFR 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" cited within these instructions at: https://www.ecfr.gov/cgi-bin/text-idx?SID=6214841a79953f26c5c230d72d6b70a1&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl. .

**You must consult with your Business Office prior to submitting this form.**

**Section A - Budget Summary**
**U.S. Department of Education Funds**

All applicants must complete Section A and provide a break-down by the applicable budget categories shown in lines 1-11.

Lines 1-11, columns (a)-(e): For each project year for which funding is requested, show the total amount requested for each applicable budget category.

Lines 1-11, column (f): Show the multi-year total for each budget category. If funding is requested for only one project year, leave this column blank.

Line 13, columns (a)-(e): Show the total budget request for each project year for which funding is requested.

Line 13, column (f): Show the total amount requested for all project years. If funding is requested for only one year, leave this space blank.

**Indirect Cost Information:** If you are requesting reimbursement for indirect costs on line 10 the indirect cost rate to be charged to the grant must be entered in the applicable field on line 10, and the following information is to be completed by your Business Office.

(1): Indicate whether or not your organization has an Indirect Cost Rate Agreement that was approved by the Federal government. If you checked "no," ED generally will authorize grantees to use a temporary rate of 10 percent of budgeted salaries and wages (**complete (4) of this section when using the temporary rate**) subject to the following limitations:

(a) The grantee must submit an indirect cost proposal to its cognizant agency within 90 days after ED issues a grant award notification; and

(b) If after the 90-day period, the grantee has not submitted an indirect cost proposal to its cognizant agency, the grantee may not charge its grant for indirect costs until it has negotiated an indirect cost rate agreement with its cognizant agency.

(2): If you checked "yes" in (1), provide a copy of your Indirect Cost Rate Agreement and indicate in (2) the beginning and ending dates covered by the Indirect Cost Rate Agreement. In addition, indicate whether ED, another Federal agency (Other) or State agency issued the approved agreement. If you check "Other," specify the name of the Federal or other agency that issued the approved agreement.

(3): If you check "no" in (1), indicate in (3) if you want to use the de minimis rate of 10 percent of MTDC (see 2CFR § 200.68). If you use the de minimis rate, you are subject to the provisions in 2 CFR § 200.414(f). Note, you may only use the 10 percent de minimis rate if you are a first-time Federal grant recipient, and you do not have an Approved Indirect Cost Rate Agreement. You may not use the de minimis rate if you are a State, Local government, or Indian Tribe, or if your grant is funded under a training rate or restricted rate program.

(5): If you are applying for a grant under a Restricted Rate Program (34 CFR 75.563 or 76.563), indicate whether you are using a restricted indirect cost rate that is included on your approved Indirect Cost Rate Agreement, or whether you are using a restricted indirect cost rate that complies with 34 CFR 76.564(c)(2). Note: State or Local government agencies may not use the provision for a restricted indirect cost rate specified in 34 CFR 76.564(c)(2). Check only one response. Leave blank, if this item is not applicable.

(6): For Training Rate Programs, ED regulations limit **non-governmental entities** to the recovery of indirect costs on training grants to the grantee's actual indirect costs, as determined by its negotiated rate agreement, or 8 percent of a MTDC, whichever is lower (see EDGAR § 75.562(c)(4)). The 8 percent limit also applies to cost-type contracts under grants, if these contracts are for training as defined in EDGAR § 75.562(a). If a **non-governmental entity** that receives a grant under a training grant program does not have an approved indirect cost rate and wants to recover indirect costs, it may use a temporary rate of 10 percent of budgeted direct salaries and wages, but it must submit an indirect cost rate proposal to its cognizant agency for indirect costs within 90 days after ED issues the GAN. After the 90-day period, the government entity may not charge its grant for indirect costs until it has negotiated an indirect cost rate agreement.

**Section B - Budget Summary**
**Non-Federal Funds**

If you are required to provide or volunteer to provide cost-sharing or matching funds or other non-Federal resources to the project, these should be shown for each applicable budget category on lines 1-11 of Section B.

Lines 1-11, columns (a)-(e): For each project year, for which matching funds or other contributions are provided, show the total contribution for each applicable budget category.

Lines 1-11, column (f): Show the multi-year total for each budget category. If non-Federal contributions are provided for only one year, leave this column blank.

Line 12, columns (a)-(e): Show the total matching or other contribution for each project year.

Line 12, column (f): Show the total amount to be contributed for all years of the multi-year project. If non-Federal contributions are provided for only one year, leave this space blank.

**Section C - Budget Narrative [Attach separate sheet(s)]**
**Pay attention to applicable program specific instructions, if attached.**

1. Provide an itemized budget breakdown, and justification by project year, for each budget category listed in Sections A and B. For grant projects that will be divided into two or more separately budgeted major activities or sub-projects, show for each budget category of a project year the breakdown of the specific expenses attributable to each sub-project or activity.

2. For non-Federal funds or resources listed in Section B that are used to meet a cost-sharing or matching requirement or provided as a voluntary cost-sharing or matching commitment, you must include:

   a. The specific costs or contributions by budget category;
   b. The source of the costs or contributions; and
   c. In the case of third-party in-kind contributions, a description of how the value was determined for the donated or contributed goods or services.

   [Please review cost sharing and matching regulations found in 2 CFR 200.306.]

3. If applicable to this program, provide the rate and base on which fringe benefits are calculated.

4. If you are requesting reimbursement for indirect costs on line 10, this information is to be completed by your Business Office. Specify the estimated amount of the base to which the indirect cost rate is applied and the total indirect expense. Depending on the grant program to which you are applying and/or your approved Indirect Cost Rate Agreement, some direct cost budget categories in your grant application budget may not be included in the base and multiplied by your indirect cost rate. For example, you must multiply the indirect cost rates of "Training grants" (34 CFR 75.562) and grants under programs with "Supplement not Supplant" requirements ("Restricted Rate" programs) by a "modified total direct cost" (MTDC) base (34 CFR 75.563 or 76.563). Please indicate which costs are included and which costs are excluded from the base to which the indirect cost rate is applied.

   When calculating indirect costs (line 10) for "Training grants" or grants under "Restricted Rate" programs, you must refer to the information and examples on ED's website at: http://www.ed.gov/fund/grant/apply/appforms/appforms.html.

   You may also contact (202) 377-3838 for additional information regarding calculating indirect cost rates or general indirect cost rate information.

5. Provide other explanations or comments you deem necessary.

**If Applicable Section D - Budget Summary**
**Limitation on Administrative Expenses.**

If your program is subject to an administrative cost cap (as indicated Section III.2.C of the program's Notice Inviting Applications (NIA)), fill out this form as follows:

1. On the top of the page, list the percentage cap on administrative costs, and indicate whether your administrative cost cap applies to both indirect and direct costs, or only direct costs (from Section III.2.C of the program's NIA).
2. IF the cost cap applies to both indirect and direct costs:
   (a) Fill out the entire table noting your administrative costs, including line 8. Line 8 is taken from Section A, line 10

For lines 1-6, these are only direct administrative costs; do not include in lines 1-6 any costs included in your indirect cost rate. If your program has a matching requirement (see NIA), include in lines 1-6 the administrative portions of the applicable rows from both Section A and Section B. If there is no program matching requirement, only use Section A.

(b) Ensure that the line 10 percentage DOES NOT EXCEED the percentage cap on administrative costs. If your program does not have a matching requirement, divide line 9 by Section A line 12. If your program does have a matching requirement, to calculate line 10, divide line 9 by the sum of Section A line 12 and Section B line 12.

3. IF the cost cap applies ONLY to direct costs:

(a) Fill out the entire table noting your administrative costs, EXCLUDING line 8.

Ensure that the line 10 percentage DOES NOT EXCEED the percentage cap on administrative costs. If your program does not have a matching requirement, divide line 7 by Section A line 9. If your program does have a matching requirement, to calculate line 10, divide line 7 by the sum of Section A line 9 and Section B line 9).

<u>**Paperwork Burden Statement**</u>

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is **1894-0008**. The time required to complete this information collection is estimated to vary from 13 to 22 hours per response, with an average of 17.5 hours per response, including the time to review instructions, search existing data sources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to U.S. Department of Education, Washington, D.C. 20202-4537. If you have comments or concerns regarding the status of your individual submission of this form, write directly to the Office of Finance and Operations, Office of Acquisitions and Grants Administration, Grants Policy and Training Division, U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, D.C. 20202.

# American Samoa Government
# Economic Stabilization Funds- Governor
# Grant Required Initial Report

| | |
|---|---|
| **Purpose:** | American Samoa Government<br>Governors Education Stabilization Fund Allocation for Outlying Areas |
| **Grant Award.:** | S425H200002 |
| **Grant Amount:** | $7,272,191 |
| **Point of Contact:** | Silia P. Time, CIP-Special Projects Coordinator<br>Office of the Governor<br>684-633-1582 |
| **Project Owner:** | American Samoa Government-Office of the Governor |

**Project Description**
Awarded grant allocations by the U.S. Department of Education are for the purpose of providing State educational agencies (SEAs), local educational agencies (LEAs), and institutions of higher education and other education-related entities with emergency assistance to address the impact of the Novel Coronavirus Disease 2019.

The American Samoa ESF-SEA funds are allocated primarily towards improvements and purchases of electronic equipment and supplies, data plans to enable internet access, sanitation services and supplies, hiring of teacher aids and similar safety and educational services. Because of American Samoa's remote geographical location, these equipment and supplies will take time to procure and to have goods shipped to the islands. ESF-SEA funds are mostly allocated to prepare and facilitate Remote Learning.

As the local Department of Education prepares our schools for Remote Learning utilizing ESF-SEF funds, Governor Lolo Moliga intends to utilize the Governor's ESF to improve and expand existing school facilities, build new classrooms facilities, hand washing stations and bathroom facilities. These improvements will provide the students, staff and school administrators with a safer school environment complying with COVID19 safety guidelines of social distancing, improved classroom air quality and promote cleanliness.

**Process for awarding ESF-Governor funds to the SEA, LEAs, and/or other education-related entities**
Grant application proposes to improve equality of learning to all our students by improving, expanding, and increasing our classrooms to accommodate the existing enrollment at our schools. Remote learning is difficult for our students as many do not have internet access at their homes. While remote learning is inevitable, we will use these funds to build additional classroom facilities in an attempt to meet the COVID-19 guidelines of social distancing, improve classroom air quality and promote cleanliness and sanitation with more handwashing stations and restrooms.

The selected SEA projects came from the listing of projects that were next to be proposed for funding through the US Department of the Interior-Office of Insular Affairs Capital Improvement Projects (CIP). Improvements to schools under the CIP are prioritized based on safety conditions of the schools and classrooms, and the need for additional classroom spaces due to the student population. Compilation of the CIP schools listing is a combined effort between the Governor's CIP-Special Programs Office, Department of Education and the Department of Public Works. The Department of Public Works provides maintenance service and repairs to all public schools. The same services are available to the LEAs through the Governor's Adopt A School Program and School Maintenance Program.

Two criteria used to determine "most significantly impacted the coronavirus" and/or "essential" for carrying out emergency educational services are 1)schools were chosen from the listing of schools awaiting CIP funding and 2)must meet the following conditions: needed improvements to learning environment; required additional classroom spaces due to the school enrollment and/or teacher to student ratio and 3) how these improvements will impact the health and safety of our students by complying with CDC, local Department of Health and Department of Education COVID-19 safety guideline of social distancing, improved classroom air quality, and promote cleanliness and sanitation. These same factors were used to determine allocations to the LEAs along with requests made to ASG and the Governor for assistance. All projects listed have been reviewed, visited and approved by the Governor and the American Samoa Government (ASG) Task Force.

Once the school listing was confirmed, the Governor, Department of Education Director and/or Staff Representative, Department of Public Works Director and/or Staff Representative, the Governor's CIP-Special Programs Office Administrator and CIP Grants Coordinator conducted site visits at the selected schools to assess and confirm each school's "essential" needs for carrying out emergency educational services.

The Governor of American Samoa, Governor Lolo M. Moliga, confirms and approves of the submitted listing of schools to be funded with Governor ESF funds.

**Specific funding conditions or requirements the Outlying Area will place on awards to ensure the funds are spent for specific purposes or activities**

The American Samoa COVID-19 Task Force has established a routing process for all expenditures of COVID-19 related costs. It is an added preliminary vetting process to ensure grant compliance with the different agencies awarded COVID-19 grants. All expenditures related to COVID-19 are routed through this process, including the Governor's ESF Projects.

Following this preliminary compliance process, all purchases and services are processed through our Local Procurement Office in compliance with the American Samoa Code Annotated Title 12, Chapter 02-Procurement of Construction, Goods, and Services. A current copy of these regulations can be obtained on this link -
http://asbar.org/2019/index.php?option=com_content&view=category&id=524&Itemid=172

The following is the process for claiming payment for services rendered (including construction work):

1. Payment request or payment application for services rendered including construction work will be verified by the assigned Department of Public Works Project Manager, approved by the Department Director and forwarded to the Governor's CIP-Special Programs Office;
2. Governor's CIP-Special Programs Office verifies project progress and availability of funds and forward payment request to Office of Procurement;
3. Office of Procurement verifies payment request/application towards terms and conditions of the contract agreement and forwards to Treasury Accounts Payable Office;
4. Treasury Accounts Payable Office prepares payment request for the Treasury Accounts Analyst:
5. Treasury Accounts Analyst verifies and submit drawdown request on G5 Payment Module;
6. Once funds are received, contractor/vendor payments are issued within three working days.

# American Samoa Government
# Economic Stabilization Funds- Governor
# Grant Required Initial Report

**The following is American Samoa's Proposed Funding Allocations Summary**
American Samoa will reserve $117,438 for administrative costs, which are Items#4 and #5 below.

| | | |
|---|---|---|
| 1 | Personnel | $0 |
| 2 | Fringe Benefits | $0 |
| 3 | Travel | $0 |
| 4 | Equipment | $100,000 |
| 5 | Supplies | $17,438 |
| 6 | Contractual | $0 |
| 7 | Construction | $7,154,753 |
| 8 | Other | $0 |
| 9 | Total Direct Costs | $0 |
| | Total Grant Award | $7,272,191 |

*Note: There are no personnel costs and therefore no indirect costs.*

Budget Details:

| | | | |
|---|---|---|---|
| 4 | Equipment (ADMIN COSTS) | (1) Equipment for Project management, compliance and monitoring including but not limited to office computers, printers, scanners and copier machines<br>(2) Purchase of a new vehicle to conduct compliance and monitoring at each construction site, SEA and LEA monitoring to ensure purchases are used as intended<br>(3) Office communications equipment and improvements to support and facilitate compliance and monitoring work | $100,000 |
| 5 | Supplies (ADMIN COSTS) | (1) Office Supplies<br>(2) Sanitation Supplies<br>(3) Furniture<br>(4) Fuel | $17,438 |
| 7 | Construction | Construction-Classroom/Facilities improvements and additions at<br>(1) Fagaitua High School<br>(2) Samoana High School<br>(3) Pavaiai Elementary School<br>(4) Alataua II Elementary School<br>(5) Nu'uuli Polytech High School<br>(6) Manu'a High School<br>(7) Leone High School<br>(8) Iakina School<br>(9) Marist St. Francis Elementary School<br>(10) Kanana Fou Elementary School<br>(11) Manumalo Academy<br>(12) Faasao Marist High School | $7,154,753 |
| | | **Total** | **$7,272,191** |

# American Samoa Government
# Economic Stabilization Funds- Governor
# Grant Required Initial Report

**Project Status**
With focus on the students' learning environment, the bidding process for the schools is aggressively going through competitive bidding through our Office of Procurement in alignment with the local laws and federal guidance.

**Project Milestones and Timeline**
With the expedited local procurement process and the grant expiration of September 2021, American Samoa is committed to utilize these funds in a timely manner. Milestones of expenditures are as follows:

| | | | |
|---|---|---|---|
| November 2020 | 25% | $1,818,047.75 | Procurement of all purchases 50% complete<br>Construction-20% |
| February 2021 | 50% | $3,636,095.50 | Procurement of all purchases 100% complete<br>Construction-50% |
| May 2021 | 75% | $5,454,143.25 | Construction-75% |
| August 2021 | 100% | $7,272,191.00 | Construction-100% |

**Grant Compliance and Monitoring**
In addition to the COVID-19 Task Force Preliminary Process and our local Procurement Process, the Governor established the COVID-19 Compliance Review Committee with the overall responsibility of making sure that every expense of COVID-19 funds is thoroughly justified and fully compliant with grants terms and conditions.

While the American Samoa Government Review Committee has the responsibility of ensuring ESF funded purchases are allowable costs per grant terms and conditions, the Governor's CIP-Special Programs Office will bear the responsibility of compliance and monitoring of selected schools to ensure purchases, services and school improvements are utilized as intended.

Monitoring and compliance of construction work will be conducted ***weekly*** to ensure construction schedule and estimated completion dates are met. Every payment request will be reviewed by the Department of Public Works assigned Construction Manager and approved by the Department Director. The payment request is then reviewed and approved by the Governor's CIP-Special Programs Office and the Office of Procurement to ensure compliance with contract terms and conditions.

Once projects are completed, services rendered and/or purchases made, the CIP-Special Programs Office will conduct Monitoring and Compliance review of selected schools ***semiannually*** during the months of December and June to ensure purchases, services and school improvements are being utilized as intended. Fiscal reviews are conducted daily to ensure timely response and corrective actions as needed.

## Identifying and Mitigating Risks

The establishment of the COVID-19 Task Force and the development of the Preliminary Grant Compliance process were intended to minimize the risk of our grants by ensuring compliance with Federal and Local guidelines as well as grant cooperative agreements. The following are identified risks and strategies for mitigating these risks.

| | Identified Risks | Strategies for Mitigating Risks |
|---|---|---|
| 1 | Unallowable Purchases | All COVID19 purchases must go through the COVID Task Force preliminary vetting process to ensure compliance with grant terms and conditions. Additionally, the Review Committee conducts regular compliance review of all expenditures to ensure 1) proper documentations of every grant expenditure, 2) compliance with grant terms and conditions and 3) purchases are compliant with all local regulations |
| 2 | Purchases are compliant with local Procurement Regulations | All COVID19 purchases must go through the COVID Task Force preliminary vetting process to ensure compliance with grant terms and conditions. Additionally, the Review Committee conducts regular compliance review of all expenditures to ensure 1) proper documentations of every grant expenditure, 2) compliance with grant terms and conditions and 3) purchases are compliant with all local regulations |
| 3 | Services and Purchases are being utilized as intended | CIP-Special Programs Office conducts semiannual Monitoring and Compliance to ensure purchases and services are being utilized as intended; Review Committee conducts regular compliance review of all expenditures to ensure 1) proper documentations of every grant expenditure, 2) compliance with grant terms and conditions and 3) purchases are compliant with all local regulations |

## Primary Documentations

Procurement retains all contracts and purchase documentations as per our local Procurement policies and procedures. The local Treasury Office processes all payments following receipt of all required documentation in accordance with their internal grant management, drawdown, and audit policies. The Treasury Office maintains **original c**opies or primary documentation per local ASG Treasury policies for annual audit purposes. Access to primary documentations may be requested through the assigned Treasury Grants Analyst for each grant.

The Office of the Governor's CIP-Special Programs will retain **copies** of all documentation of expenditures. Hard copies will be kept in a filing cabinet in the Governor's CIP- Special Programs Office located at the A.P. Lutali Executive Office Building, 2nd Floor.  Access to copies of documentation of expenditures may be requested through the CIP-Governor's CIP-Special Programs Administrator.

## Conclusion

American Samoa is truly grateful for the award of these emergency funds and plans to aggressively and efficiently expedite the use of these funds for the benefit of our students.  We hope to meet all milestones as set forth with the support of the US Department of Education. We look forward to completing all these priority COVID-19 projects in a timely basis and will be submitting quarterly reports of the grants progress.