

Greg Minikel

From: Thole, Heather - DMA <heather.thole@widma.gov>
Sent: Monday, January 8, 2024 2:22 PM
To: Greg Minikel
Cc: Mackenzie Reed; Dan Koski; 'Haen, Baylor'; Atkinson, Chad - DMA
Subject: External: EMC-2022-BR-008-0013 City of Manitowoc Subaward Approval Email #2
Attachments: 03 - EMC-2022-BR-008-0013 Manitowoc - State-Local Agreement.pdf; 04 - EMC-2022-BR-008-0013 Manitowoc - Subrecipient Quarterly Status Report.docx; 05 - EMC-2022-BR-008-0013 Manitowoc - Budget Summary.pdf; 06 - EMC-2022-BR-008-0013 Manitowoc - REC.pdf; 07 - EMC-2022-BR-008-0013 Manitowoc - Request for Reimbursement.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Here is the additional documentation that I referred to in email #1.

- 03 - EMC-2022-BR-008-0013 Manitowoc - State-Local Agreement
- 04 - EMC-2022-BR-008-0013 Manitowoc - Subrecipient Quarterly Status Report
- 05 - EMC-2022-BR-008-0013 Manitowoc - Budget Summary
- 06 - EMC-2022-BR-008-0013 Manitowoc - REC
- 07 - EMC-2022-BR-008-0013 Manitowoc - Request for Reimbursement

Please let me know if you would like to setup a meeting to review the award documents. We can schedule an in person or virtual meeting. You can always reach out to us with any questions that you have.

Kind regards,



wem.wi.gov

Heather Thole
State Hazard Mitigation Officer

Wisconsin Emergency Management
PO Box 7865
Madison, WI 53707-7865
Phone: (608) 282-5301
Email: heather.thole@widma.gov

Be Alert !

This is External or System generated Email. Please verify before opening any links or attachments.

WISCONSIN DIVISION OF EMERGENCY MANAGEMENT
State-Local Building Resilient Infrastructure and Communities Program Agreement
BRIC Federal Fiscal Year 2022
Capability & Capacity Building

CAGE Code: 5DAC9
SAM.gov Unique Entity Identifier (UEI): RK45L3JJ2GX3

This Assistance Agreement between the Wisconsin Division of Emergency Management (WEM/ the Recipient) and the City of Manitowoc (the Subrecipient) shall be effective on the date signed by WEM and the Subrecipient. It shall apply to all Building Resilient Infrastructure and Communities (BRIC) Program assistance provided by or through WEM to the Subrecipient for the grant BRIC Federal Fiscal Year (FFY) 2022.

The purpose of this agreement is to formally recognize the goals of the BRIC and to establish guidelines by which BRIC funds are to be used. This agreement is in addition to the requirements outlined in the Assurances for Construction and Non-Construction Projects language that was signed either on paper or electronically by the subrecipient when submitting the BRIC subapplication.

Be it resolved by the Subrecipient, that the individual named below:

(Name and Title)

has the legal authority and is hereby authorized to execute documents for and on behalf of the Subrecipient. The designated individual is to be the authorized representative for obtaining BRIC funds.

The Subrecipient hereby assures and certifies that the project will comply with the applicable State of Wisconsin and federal regulations. Also, the Subrecipient gives assurance and certifies with respect to and as a condition for the subaward the following at a minimum:

- This assistance Agreement in the amount of \$330,000.00 will serve as the contract between WEM and the Subrecipient to complete design work for a dry detention basin and storm sewer improvements for flood reduction. 75%, or \$247,500.00, is the federal share funded through FEMA. The remaining 25%, or \$82,500.00, is the required local program match (may not be comprised of other federal funds or match to other federal funds, i.e. EMPG or match to EMPG). If there is a cost under-run for the project, final reimbursement for the federal share of the project costs will be adjusted based on the actual costs of the project. If costs exceed the amount approved, the Subrecipient is responsible for the costs in excess of the approved subaward.

In addition to the project funds listed above, FEMA has made available 5% of the total project costs, or \$16,500.00, in in Subrecipient Management Costs (SRMC). SRMC consists entirely of federal funds and cover activities associated with managing the grants. SRMC will be reimbursed at a rate of no more than 5% of actual documented project expenditures.

- The Subrecipient will adhere to the special conditions as identified in the Record of Environmental Consideration (REC), dated August 31, 2023 in completing the project.
 - The Subrecipient must follow all applicable local, state, and federal laws, regulations, and requirements for the abatement and disposal of lead, asbestos, and other routinely encountered hazardous substances. If there is an unusual material encountered or there is an extraordinary amount of lead, asbestos, or other routinely encountered material, the Subrecipient must also contact the recipient and the relevant agency with authority for regulation of the material.
 - If deviations from the proposed scope of work result in design changes, the need for additional ground disturbance, additional removal of vegetation, or in any other unanticipated changes to the physical environment, the Subrecipient must contact WEM immediately and a re-evaluation under NEPA and other applicable environmental laws will be conducted by FEMA.
 - Project has been evaluated and approved for planning, non-intrusive data gathering, architectural and engineering design work only; no construction or other ground disturbance besides geotechnical investigation is approved.

- Once this Assistance Agreement is signed and returned to WEM, the Subrecipient may begin the project process and the authorized representative may request reimbursement of expenses as identified in the budget included in the approved subapplication. The Subrecipient will need to complete and submit to WEM a Request for Reimbursement of Expenses with appropriate documentation in order to receive subaward funds. Advancement of funds may be made in some extraordinary situations upon prior approval of the recipient.

COSTS INCURRED PRIOR TO FEMA APPROVAL OF THE SUBAWARD, UNLESS PRE-AWARD COSTS WERE INCLUDED AND APPROVED IN THE SUBAPPLICATION, ARE NOT ALLOWABLE COSTS FOR THE SUBAWARD.

- The authorized representative will be required to submit Quarterly Status Reports to the State Hazard Mitigation Officer (SHMO) within 15 days of the end of the quarter (January 15, April 15, July 15, and October 15 each year). Said reports will include the status of the project including property acquisition and demolition data, anticipated completion date, and financial information.

- The Subrecipient will meet the following timeline for completing this grant:

Start Date	No later than January 31, 2024
Completion Date	February 28, 2025

If the Subrecipient is delayed in their completion of the grant by an event beyond their control, a request for an extension must be received in writing 90 days prior to the completion date.

- The performance period for the BRIC grant subaward will be September 23, 2023 to September 22, 2026.

- The final request for reimbursement and a final report covering all aspects of the grant will be due 30 days after completion of the scope of work. final report must include the following:
 - Copies of permits and forms as identified in the approval letter for the Record of Environmental Consideration and in number 2 of this document.
 - Final design documents.
 - Benefit-cost Analysis
 - Other information as required.
- The BRIC funds requested for the project shall not duplicate benefits received from any other disaster assistance program.
- The Subrecipient will use BRIC funds solely for the purpose for which they are provided.
- The Subrecipient shall maintain good standing with the National Flood Insurance Program (NFIP) and comply with local regulations pertaining to the NFIP.
- The Subrecipient will update their floodplain ordinance to meet the current Wisconsin Department of Natural Resources requirements.
- The Subrecipient will comply with all other policies and guidelines established by FEMA and WEM in administering the BRIC program.
- The Subrecipient will follow 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards:
 - Transfer of funds among budget cost categories in any approved budget with a federal share in excess of the Simplified Acquisition Threshold (\$150,000 at the time this agreement was drafted) shall receive the prior approval of FEMA when such cumulative transfers among those cost categories exceed 10% of the total budget. (2 CFR Part 200.308(e))
 - Cost-sharing requirements found in 2 CFR Part 200.306.
 - Requirements for equipment and supply purchases and procurement found in 2 CFR Part 200 Sections 313, 314, and 322, respectively.
- The Subrecipient will follow 2 CFR Part 225, Cost Principles for State, Local, and Indian Tribal Governments.
- Any publication resulting from work performed under this agreement shall include an acknowledgement of FEMA financial support and a statement that the publication does not constitute an endorsement of FEMA or reflects FEMA's views. The recipient and FEMA are free to copyright any original work developed under this agreement, and reserve a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use, and to authorize others to use the work for government purposes.
- The Subrecipient will not enter into cost-plus-percentage-of-cost contracts for completion of the BRIC project.
- The Subrecipient will not enter into any contract with any party that is debarred or suspended from participating in federal assistance programs. (See <https://www.sam.gov>.)

- Per 2 CFR Part 25, register and maintain an active System for Award Management (SAM) (<http://www.sam.gov>) registration with current information through the life of the subaward. The Subrecipient is required to review and update information in the SAM database on an annual basis from the date of initial registration or subsequent updates to ensure it is current, accurate, and complete.
- Records shall be retained three years following the date the BRIC award is closed for Wisconsin's BRIC FFY 2022 in accordance with 2 CFR Part 200.333.

SIGNATURE OF SUBRECIPIENT'S AUTHORIZED REPRESENTATIVE:

_____ Date: _____

Name (printed) Title

Jurisdiction

SIGNATURE OF THE RECIPIENT (WISCONSIN DIVISION OF EMERGENCY MANAGEMENT):

Heather Chole _____ Date: 1/8/2024

State Hazard Mitigation Officer

**STATE OF WISCONSIN
DEPARTMENT OF MILITARY AFFAIRS
DIVISION OF EMERGENCY MANAGEMENT
2400 Wright Street, P.O. Box 7865
Madison, WI 53707-7865**

**QUARTERLY STATUS REPORT
Contact and Program Information**

Name (Last, First)	Minikel, Gregory
Title	Engineering Division Manager
Subgrantee	City of Manitowoc
Phone Number	(920) 686-6912
E-mail	gminikel@manitowoc.org
County	Manitowoc County
Project Number	EMC-2022-BR-008-0013
Disaster # (HMGP)	N/A
Federal Fiscal Year (BRIC, PDM & FMA)	2022
Quarterly Report Date	Jan 15 th __ April 15 th __ July 15 th __ Oct 15 th __ Year ____
Quarterly Report Submittal Date	

Funding Program	<input type="checkbox"/> Flood Mitigation Assistance (FMA)
	<input type="checkbox"/> Pre-Disaster Mitigation Competitive Project Grant (PDM)
	<input type="checkbox"/> Legislative Pre-Disaster Mitigation Appropriation Grant (LPDM)
	<input checked="" type="checkbox"/> Building Resilient Infrastructure and Communities (BRIC) Program
	<input type="checkbox"/> Section 404 Hazard Mitigation Grant Program (HMGP)

Type of Project	<input type="checkbox"/> Acquisition/Floodproofing	<input type="checkbox"/> Planning or Planning-Related
	<input type="checkbox"/> Safe Room	<input checked="" type="checkbox"/> Capability & Capacity Building
	<input type="checkbox"/> Infrastructure	<input type="checkbox"/> Advance Assistance
	<input type="checkbox"/> Other (specify): _____	

Date Grant was Approved	12/26/2023
Start Date of Project	1/31/2024
Is the Project on Schedule? (yes / no) (Circle One) <i>If no, provide an explanation why and a new estimated completion date below.</i>	
Estimated Project/ Completion Date	2/28/2025
Amount of Approved Grant (100%)	Project funds: \$330,000.00
	Subrecipient Management Costs: \$16,500.00
Approximate Amount Spent to Date (100%)	Project funds:
	Subrecipient Management Costs:
Anticipated (Overrun / Underrun) (Circle One)	

ENVIRONMENTAL/HISTORIC PRESERVATION (EHP) GRANT CONDITIONS

Please list all EHP grant conditions from the REC for this project:

- Project has been evaluated and approved for planning, non-intrusive data gathering, architectural and engineering design work only, no construction or other ground disturbance besides geotechnical investigation is approved.

Do you have concerns with or do you believe you have violated any of the conditions listed above? If so, please stop work and contact our office immediately at DMAWEMHazardMitigation@wisconsin.gov.

ADDITIONAL QUESTIONS OR COMMENTS

1. Other costs incurred to date:

Item	Amount

2. Narrative summary of progress on project or plan: (attach additional sheets if necessary)

3. Percentage of work completed:

4. Problems encountered and assistance needed:

5. Other information pertinent to the overall grant:

SIGNATURE

SUBRECIPIENT'S AUTHORIZED REPRESENTATIVE

DATE

BUDGET SUMMARY FOR REIMBURSEMENT REQUEST
CITY OF MANITOWOC CAPBILITY & CAPACITY BUILDING SUBGRANT EMC-2022-BR-008-0013

	Preliminary Design Documents	Hydraulic & Hydrology Modeling	Project Managements Costs	Permitting & Bidding	Benefit Cost Analysis	Final Design Documents	Data Collection & Survey	TOTAL	Federal Share	Local Match	Total	SRMC
BUDGET	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00
REQUEST NO. 1								\$ -			\$ -	\$ -
BALANCE	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00
REQUEST NO. 2								\$ -			\$ -	\$ -
BALANCE	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00
REQUEST NO. 3								\$ -			\$ -	\$ -
BALANCE	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00
REQUEST NO. 4								\$ -			\$ -	\$ -
BALANCE	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00
REQUEST NO. 5								\$ -			\$ -	\$ -
BALANCE	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00
TOTAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -
BALANCE	\$ 151,570.00	\$ 9,550.00	\$ 37,520.00	\$ 47,750.00	\$ 30,020.00	\$ 3,180.00	\$ 50,410.00	\$ 330,000.00	\$ 247,500.00	\$ 82,500.00	\$ 330,000.00	\$ 16,500.00

Transfer of funds between budget cost categories in the approved budget shall receive the prior approval of FEMA when such cumulative transfers among those cost categories exceed 10% of the total budget.

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project EMC-2022-BR-008-0013

Title: South Central Manitowoc Grand Avenue and Rubick Field Storm Sewer and Dry Pond Design (FEMA BRIC)

NEPA DETERMINATION

Non Compliant Flag: No
 EA Draft Date: EA Final Date:
 EA Public Notice Date: EA Fomsl Level: CATEX
 EIS Notice of Intent EIS ROD Date:

Comment The City of Manitowoc, Manitowoc County, is requesting funding to conduct engineering and design for a future project to design the Grand Avenue Storm Sewer Improvements and Rubick Field Dry Detention Basin that will be constructed in a school athletic field (44.079452, -87.676536). Project scoping will include topographic survey, design, hydraulic and hydrology modeling, completing a benefit-cost analysis, permitting, and geotechnical testing. Up to ten soil borings, up to four in the proposed pond footprint and six in the road right of way of Grand Avenue, S 21st Street and S 23rd Street, are proposed to depth from 15 to 25 feet. A vehicle mounted drill rig will be used. This review approves design work with no ground disturbing activities except for geotechnical investigation.

This project has been determined to be categorically excluded from the need to prepare either an Environmental Impact Statement or Environmental Assessment in accordance with CATEX A4 & A7 as implemented under FEMA Instruction 108-1-1 and DHS Instruction 023-01-001-01, Rev. 1. Particular attention should be given to the project conditions before and during project implementation. Failure to comply with these conditions may jeopardize federal assistance including funding.
 - gadams18 - 08/30/2023 13:22:55 GMT

CATEX CATEGORIES

Catex Category Code	Description	Selected
a4	(a4) Information gathering, data analysis and processing, information dissemination, review, interpretation, and development of documents. If any of these activities result in proposals for further action, those proposals must be covered by an appropriate CATEX. Examples include but are not limited to: (a) Document mailings, publication and distribution, training and information programs, historical and cultural demonstrations, and public affairs actions. (b) Studies, reports, proposals, analyses, literature reviews; computer modeling; and non-intrusive intelligence gathering activities.	Yes
a7	(a7) The commitment of resources, personnel, and funding to conduct audits, surveys, and data collection of a minimally intrusive nature. If any of these commitments result in proposals for further action, those proposals must be covered by an appropriate CATEX. Examples include, but are not limited to: (a) Activities designed to support the improvement or upgrade management of natural resources, such as surveys for threatened and endangered species, wildlife and wildlife habitat, historic properties, and archeological sites; wetland delineations; timber stand examination; minimal water, air, waste, material and soil sampling; audits, photography, and interpretation. (b) Minimally-intrusive geological, geophysical, and geo-technical activities, including mapping and engineering surveys. (c) Conducting Facility Audits, Environmental Site Assessments and Environmental Baseline Surveys, and (d) Vulnerability, risk, and structural integrity assessments of infrastructure.	Yes

EXTRAORDINARY

Extraordinary Circumstance Code	Description	Selected ?
	No Extraordinary Circumstances were selected	

17:32:43

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project EMC-2022-BR-008-0013

Title: South Central Manitowoc Grand Avenue and Rubick Field Storm Sewer and Dry Pond Design (FEMA BRIC)

ENVIRONMENTAL LAW / EXECUTIVE ORDER

Environmental Law/ Executive Order	Status	Description	Comment
Clean Air Act (CAA)	Completed	Project will not result in permanent air emissions - Review concluded	
Coastal Barrier Resources Act (CBRA)	Completed	Project is not on or connected to CBRA Unit or otherwise protected area - Review concluded	
Clean Water Act (CWA)	Completed	Project would not affect any water of the U.S. - Review concluded	
Coastal Zone Management Act (CZMA)	Completed	Project is located in a coastal zone area and/or affects the coastal zone	
	Completed	State administering agency does not require consistency review - Review concluded	
Executive Order 11988 - Floodplains	Completed	No effect on floodplain/flood levels and project outside floodplain - Review concluded	Per Flood Insurance Rate Map (FIRM) panel 55071C0308E, effective 2/23/2023, the project is located outside the mapped Special Flood Hazard Area (SFHA). - gadams18 - 08/30/2023 13:54:57 GMT
Executive Order 11990 - Wetlands	Completed	No effects on wetlands and project outside wetlands - Review concluded	
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Completed	No Low income or minority population in, near or affected by the project - Review concluded	FEMA has determined that the following types of activities have limited or no potential to affect minority or low-income populations and FEMA has no further EO 12898 responsibilities with regards to this project. - gadams18 - 08/30/2023 14:05:27 GMT
Endangered Species Act (ESA)	Completed	Listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action	Project information submitted to IPaC on 07/12/2023 identified the threatened and endangered species noted in the attached species list. The project proposes a storm sewer and dry pond mitigation design. No impacts to listed species are anticipated. - gadams18 - 08/30/2023 13:25:29 GMT
	Completed	No effect to species or designated critical habitat (See comments for justification) - Review concluded	
Farmland Protection Policy Act (FPPA)	Completed	Project does not affect designated prime or unique farmland - Review concluded	
Fish and Wildlife Coordination Act (FWCA)	Completed	Project does not affect, control, or modify a waterway/body of water - Review concluded	

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project EMC-2022-BR-008-0013

Title: South Central Manitowoc Grand Avenue and Rubick Field Storm Sewer and Dry Pond Design (FEMA BRIC)

Environmental Law/ Executive Order	Status	Description	Comment
Migratory Bird Treaty Act (MBTA)	Completed	Project located within a flyway zone	
	Completed	Project does not have potential to take migratory birds - Review concluded	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Completed	Project not located in or near Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Completed	Applicable executed Programmatic Agreement. Activity meets Programmatic Allowance (enter date and # in comments) - Review concluded	Per Statewide Programmatic Agreement effective July 18, 2017, SOW meets allowance II.F, pertaining to geotechnical studies. - dnagle2 - 08/17/2023 14:06:32 GMT***Additional information*** The Undertaking also complies with Stipulation I.A.7(f) - Assistance provided for planning, studies, design and engineering costs that involve no commitment of resources other than staffing and associated funding. - dnagle2 - 08/31/2023 16:50:41 GMT
Wild and Scenic Rivers Act (WSR)	Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

CONDITIONS

Special Conditions required on Implementation of Projects:

Project has been evaluated and approved for planning, non-intrusive data gathering, architectural and engineering design work only, no construction or other ground disturbance besides geotechnical investigation is approved.

Source of condition: NEPA Determination

Monitoring Required: No

Standard Conditions:

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

**STATE OF WISCONSIN
DEPARTMENT OF MILITARY AFFAIRS
DIVISION OF EMERGENCY MANAGEMENT
2400 Wright Street, P.O. Box 7865
Madison, WI 53707-7865
BUILDING RESILIENT INFRASTRUCTURE & COMMUNITIES
REQUEST FOR REIMBURSEMENT OF EXPENSES**

Grant Number: EMC-2022-BR-008-0013
Subrecipient: City of Manitowoc
CAGE Code: 5DAC9

Date: Enter Date
County: Manitowoc

Total Award Amount (federal+local) Local match cannot be time charged to any other federal grants or time used as match for other federal grants (i.e. EMPG, EPCRA).	\$330,000.00	
Maximum Management Funding Approved (100% federal)	\$16,500.00	
	Grant Funds	Management Funds
Total Amount Spent to Date	\$Enter Amount (federal+local)	\$Enter Amount (federal)
Total Amount Reimbursed to Date	\$Enter Amount (federal)	\$Enter Amount (federal)
Total Amount Spent Since Last Request	\$Enter Amount (federal+local)	\$Enter Amount (federal)
Requested Reimbursement Amount	\$Enter Amount (75% of total)	\$Enter Amount (federal)
Requested Advance, PRIOR APPROVAL REQUIRED (see attached instructions)	\$Enter Amount	N/A – only actual costs incurred may be claimed

* Attach supporting documentation including invoices, proof of payments, bid tabulations, contracts, etc.

Signature – Subrecipient’s Authorized Representative

Grant Funding Approved \$ _____ Management Approved \$ _____

Signature – State Mitigation Representative

Date

When receiving funds in advance of spending them, the following must be adhered to:

1. If possible funds should be expended within three business days of receipt.
2. Deposit any advance BRIC funds into a separate, non-interest-bearing bank account.
3. If any interest is generated, it must be reported to the State and spend for project administrative purposes before any additional funds are drawn down.
4. Subrecipients should reconcile earned interest each calendar quarter. If earned-and-expended interest exceeds \$100 at any time during the calendar year, all interest in excess of \$100 shall be returned to the U.S. Treasury.