



PORT INFRASTRUCTURE GRANT WORKSHOP FOR INLAND WATERWAY GREAT LAKES AND PORTS

Post Grant Agreement Activities:
Invoicing – Eligible Expenses
Tracking of Asset Ownership and Disposal

November 21, 2024



- **Delphi eInvoicing System**
- **Budget Period End Date**
- **Starting Work**
- **Quarterly Reporting**
- **Performance Measurement Report**
- **Modifications to Scope / Schedule / Budget**
- **Payment**
- **Close Out**
- **Record Retention / Asset Ownership / Disposal**

- **eInvoice has been implemented by the Department of Transportation (DOT) as a program to transform and automate the invoice and grants payment process. This program will improve online invoice processing activities by having vendor and grant recipients submit invoices electronically via the Delphi eInvoicing System.**
- **The Delphi eInvoicing System is a real-time invoicing tool that improves efficiency and data transparency by reducing the time between invoice submission and payment and by providing grant recipients with accurate invoice status reporting capabilities.**

**Online training for using Delphi is available here:
<https://einvoice.esc.gov>**

- **Budget Period End Date – This means the time during which recipients are authorized to expend the current funds awarded and must meet the matching or cost-sharing requirements.**
- **Costs incurred outside the budget period or pre-agreement cost date may not be eligible for reimbursement. Matching costs incurred outside of the budget period will not be eligible contributions.**

- **All awards must have an approved scope, schedule, and budget. Costs incurred falling outside the approved scope and without MARAD written approval may not be eligible for reimbursement. Cost incurred prior to all required documentation (Section 106, NEPA) being approved by MARAD or without receiving Pre-Award Authority will not be eligible for reimbursement.**
- **Domestic Preference – Your grant project is subject to the requirements of the Build America, Buy America Act, which was enacted as part of the Bipartisan Infrastructure Law in November of 2021. Therefore, all iron, steel, manufactured products, and construction materials used in the project are subject to the domestic content requirements of the Build America, Buy America Act, Pub. L. No. 117-58, div. G, tit. IX, subtit. A, 135 Stat. 429, 1298 (2021), as implemented in the terms and condition of the grant agreement.**

Quarterly Reporting –All Recipients must submit the Quarterly Progress Report, the SF-425 Federal Financial Report and Recertification Form

Reports are due 20 days after the end of each quarter and are to be submitted via email.

Reimbursement requests may be denied for delinquent reporting.

Reporting Period	Oct 1 – Dec 31 FFY Q1	Jan 1 – Mar 31 FFY Q2	Apr 1 – Jun 30 FFY Q3	Jul 1 – Sept 30 FFY Q4
Report Due Date	January 20	April 20	July 20	October 20

- **The Recipient shall submit to MARAD, on or before the Baseline Report Date that is stated within the grant agreement. A Pre-project Performance Measurement Report should contain:**
 - **Baseline data for each performance measure that is identified in the Performance Measurement Table within the grant agreement, and a detailed description of the data sources.**

Budget Modifications – If the “Other Federal Funds” amount increases or one or more of the “State Funds,” “Local Funds,” “Other Funds,” or “Total Eligible Project Cost” amount decreases, then the Recipient shall request a modification of this agreement to update the Budget. If the actual eligible project costs are less than the “Total Eligible Project Cost”, that is listed within the grant agreement, then the Recipient may propose to MARAD, in writing consistent with MARAD’s requirements, specific additional activities that are within the scope of this award.

Schedule Modifications – The Recipient shall request a modification of this agreement to update the relevant dates, if the substantial completion date for the Project or a component of the Project listed within the grant agreement is more than six months after the estimated date(s). If the budget period or the period of performance need to continue after the budget period end or the period of performance end date listed within the grant agreement a modification is required.

Statement of Work Modifications – If the Project’s activities differ from the approved scope that is described within the fully executed grant agreement, then the Recipient shall request a modification of this agreement to update scope of work. Work on the new scope cannot start prior to MARAD written approval, nor should it go out to bid until MARAD has reviewed and approved the scope request.

- **Payment – Payment is on a reimbursement basis and each request must be submitted via “Delphi eInvoicing System”. This award is subject to the cost principles at 2 CFR 200 subpart E, including provisions on determining allocable cost and determining allowable costs. The Recipient shall not request reimbursement of a cost before the Recipient has entered a fully executed grant agreement. The Recipient shall not charge to this award costs that are incurred after the budget period. The Recipient shall not charge to this award costs that were incurred before the date of this agreement unless those costs have been reviewed and received Pre-Award Authority under 2 CFR 200.458 and/or 46 USC 54301(a)(10)(b). Reimbursement Requests should be submitted no more than monthly. If the Recipient requests reimbursement for a cost more than 180 days after the cost was incurred, MARAD may deny the request for being untimely.**
- **You may be required to spend matching funds proportionally with Federal funds. Please refer to your grant agreement for specific requirements.**

Before requesting payment, please be sure of the following:

- **Have a signed Agreement and an approved scope, schedule, and budget**
- **Be current on all Reports**
- **UEI is active**
- **Be current on all scheduled deliverables as outlined in your grant agreement**
- **Proof of payments**
- **Itemized bills, invoices, and receipts**
- **Please complete the Invoices Summary Worksheet**
- **Seek reimbursement for only allowable costs incurred during the budget period**
- **Ensure the Federal portion of the total project cost does not exceed the authorized amount.**
- **Attach appropriate supplemental information (Invoices, Cancelled Checks, ACH Payments, detailed breakout of all costs incurred, etc.) to tie costs back to the approved budget and Statement of Work and allow MARAD to evaluate the reimbursement request.**

5 Most Common Reasons for Rejection

1) Invoice Discrepancies

- 1) Missing or Incorrect Sub-Contractor Invoices
- 2) Non-Allowable Costs being Requested (non-compliance with 2 CFR 200 or outside of the scope of work)

2) Missing or Incorrect Proof of Payments

- 1) Lack of ACH or front and back of checks

3) Federal and Non-Federal Percentage breakdown being requested per reimbursement is wrong

4) Penny discrepancies in Non-Federal, Federal, or Total amounts due to formulas and rounding errors

5) Inaccurate Information provided on SF-270

- 1) Incorrect Payment Request Number (Item 5)
- 2) Period Covered by this Request date (Item 8)
- 3) Miscalculations on computation of amount of reimbursements (Item 11)

- **Close-Out – There are two separate closeout procedures followed for construction. The first is the Construction Project Closeout followed by the Grant closeout. The Construction Project closeout occurs at the point of substantial completion of the project. It is a process to ensure that the project scope was successfully completed and delivered. The Grant closeout occurs after the performance measures period and receipt of the final Outcomes report and all other required documentation is collected.**

- **Project Closeout Procedures:**
 - **Site Visit by a MARAD engineer to validate on-site (or virtually) that the construction requirements of the grant agreement have been completed. This includes taking pictures and documenting in a written report that the project elements described in the agreement have been completed.**
 - **Documentation required for this process are a checklist with the construction closeout documents, substantial completion or final completion certification, and a letter from the grantee, stating that the project has been completed at its satisfaction and all payments related to the construction have been completed.**

- **Records Retention** – All records, documents and invoices must be kept for a minimum of three years following the close-out of the award.
- **Disposal** – If equipment is purchased using federal funds, the Recipient must request disposition instructions from MARAD (if purchased using MARAD sourced funding) by submitting the SF-428C form. Along with the SF-428C, the Recipient should provide a justification indicating how to they will dispose the equipment (e.g. selling it, transferring it to another project, returning it to the government, etc.). Approval is needed prior to taking any action with the equipment. The Recipient may need to reimburse MARAD if selling the equipment and not using it for another federal funded project.
- **Additional Resources – MARAD Grants:**

<https://www.maritime.dot.gov/grants/federal-grant-assistance/federal-grant-assistance>

Questions?

