Treasury Office of Gulf Coast Restoration
RESTORE Act Eligible Entity
OPERATIONAL SELF-ASSESSMENT (OSA)

OSA Instructions

On July 6, 2012, the President signed the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012 (RESTORE Act) into law. The Act establishes a Trust Fund in the Treasury of the United States, known as the Gulf Coast Restoration Trust Fund. Under the Act, amounts in the Trust Fund are available for programs, projects, and activities that restore and protect the environment and economy of the Gulf Coast region. For the Direct Component and Centers of Excellence Research Grants Program, Treasury is responsible for determining eligibility and monitoring compliance with requirements in the RESTORE Act and other federal laws and policies on grants.

Treasury's RESTORE Act guidance requires that all eligible entities under the Direct Component and the Centers of Excellence Research Grants Program complete an Operational Self-Assessment (OSA) prior to receiving funding and once a year thereafter. The OSA focuses on operational internal control areas and will be used, in part, to assist Treasury in determining an appropriate compliance monitoring protocol. The OSA is not intended to provide guidance regarding compliance or audit requirements, but simply as a data gathering tool.

Please complete the OSA form electronically. Once you have entered the required information, please print the last page and have the OSA signed by the individual who has the authority to commit your organization to Treasury's grant management requirements. Please scan and include the signature pages with your electronic submission.

The completed OSA form should be submitted via email to restoreact@treasury.gov.

The OSA form contains three parts:

- o Organization Contact information
  Enter the required descriptive information about the recipient organization and identify the name, title and contact information of the individual who is responsible for completing this form. The contact person who completes the form may be different from the individual, described above, who has the authority to commit the organization to the requirements. Be sure to include the date on which the form was completed.

- o Operational Self-Assessment Questions
  The OSA questions are organized by the five components of internal control consistent with the Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* (known as the Green Book): control environment, risk assessment, control activities, information and communication, and monitoring.

Please click on the "Y" to answer Yes or the "N" to answer No for each question in the OSA. Provide any additional comments pertinent to your answers. The Comment spaces are set so that the text will wrap when you type.

- o Certification of the Applicant's Authorized Representative
  Identify the individual who has the authority to commit the organization to the Council's grant management requirements and who can certify the accuracy of the statements made in the form. As noted above, the signed certification page is required.

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	Organization Contact Information		
Entity Name			
OSA Completed By			
Job Title			
Contact Details	Email	Phone number	
Entity Address			
Date OSA Completed			
Comments			

Self-Assessment Questions

Environment

Questions	Please respond "Y" or "N"		Comments
1. Does management promote open communications throughout the organization and effectively provide information to employees and other stakeholders?	Y	N	
2. Does management provide adequate training and supervisory oversight to all employees to ensure that the organization effectively carries out its programs and activities, including employees working on federal grant programs?	Y	N	
3. Do policies, procedures and processes for managing federal grant funds meet the requirements of OMB 2 CFR Chapter I and Chapter II, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards?	Y	N	
4. Are the organization's internal controls in compliance with guidance in the "Standards for Internal Control in the Federal Government" issued by the United States Government Accounting Office?	Y	N	
5. Does management regularly create, review and update policies, procedures and processes to ensure that the organization effectively carries out its programs and activities, including updates that may be needed for federal grant funds?	Y	N	
6. Does management periodically assess and maintain proper segregation of duties?	Y	N	
7. Does management have a written code of conduct or ethics policy that is reviewed and signed off by employees at least annually?	Y	N	
8. Does management have a written conflict of interest policy that is reviewed and signed off by employees at least annually?	Y	N	
9. Do management and employees attend anti-fraud awareness training at least annually and is that training evidenced by attendance sheets or other mechanisms?	Y	N	
10. Does management have written policies and procedures in place for employees to confidentially report suspected violations of policies and or suspected instances of fraud or other criminal activity, including specifically those related to federal grant programs?	Y	N	
11. Does management perform the following: a. Address breaches of the code of conduct or ethics policy b. Address instances of fraud or other criminal activity c. Take remedial actions to prevent future violations d. Notify the appropriate federal agency in cases of confirmed fraud related to federal funds	Y Y Y Y	N N N N	
12. Does the organization have a written grants management manual or standard operating procedures?	Y	N	

Risk Assessment

Questions	Please respond "Y" or "N"		Comments
13. Does the organization have a documented internal control program and risk assessment methodology for managing and monitoring operational, financial and regulatory compliance risks that is periodically reviewed and updated as needed?	Y	N	
14. Does the organization have a documented risk assessment and compliance monitoring process in place specifically for federal grant programs?	Y	N	

Objectives

Questions	Please respond "Y" or "N"		Comments
15. Allowable / Unallowable Activities & Costs – Does an effective system of internal controls exists to provide reasonable assurance that federal awards are expended only for allowable activities and that the costs of goods and services charged to federal awards are allowable and in accordance with the applicable cost principles?	Y	N	
16. Cash – Does an effective system of internal controls exists to provide reasonable assurance that the (1) drawdown of federal cash is only for immediate needs, (2) reimbursement is requested only after costs have been incurred, (3) entities comply with applicable Treasury agreements, and (4)recipients limit payments to subrecipients to immediate cash needs?	Y	N	
17. Davis-Bacon Act – Does an effective system of internal controls exists to provide reasonable assurance that contractors and subcontractors were properly notified of the Davis-Bacon Act requirements and the required certified payrolls were submitted to the non-federal entity?	Y	N	
18. Eligibility – Does an effective system of internal controls exists to provide reasonable assurance that only eligible individuals and organizations receive assistance under federal award programs and that subawards are made only to eligible subrecipients?	Y	N	
19. Equipment & Real Property – Does an effective system of internal controls exists to provide reasonable assurance that: a. Proper records are maintained for equipment acquired with federal awards b. Equipment is adequately safeguarded and maintained c. Disposition or encumbrance of any equipment or real property is in accordance with federal requirements d. A physical inventory and reconciliation of property is conducted at least every two years e. The federal awarding agency is appropriately compensated for its share of any property sold or converted to non-federal use	Y Y Y Y Y	N N N N N	
20. Real Property Acquisition & Relocation – Does an effective system of internal controls exists to provide reasonable assurance of compliance with the real property acquisition, appraisal, negotiation, and relocation requirements?	Y	N	

Objectives (Continued)			
Questions	**Please respond "Y" or "N"**		Comments
21. Matching, Level of Effort, Earmarking – Does an effective system of internal controls exists to provide reasonable assurance that matching, level of effort, or earmarking requirements are met using only allowable funds or costs which are properly calculated and valued?	Y	N	
22. Financial Management – Does a financial management system provide for effective control over and accountability for all funds, property and other assets, including ensuring that all such assets are used solely for authorized purposed and activities that are allowable in accordance with the applicable cost principles and are only used during the authorized period of availability?	Y	N	
23. Procurement, Suspension & Debarment – Does an effective system of internal controls (including written procurement procedures) exists to provide reasonable assurance that procurement of goods and services are made in compliance with the provisions of 2 CFR 200 and that covered transactions are not made with a debarred or suspended party?	Y	N	
24. Program Income – Does an effective system of internal controls exists to provide reasonable assurance that program income is correctly earned, recorded, and used in accordance with the program requirements?	Y	N	
25. Reporting – Does an effective system of internal controls exists to provide reasonable assurance that reports of federal awards submitted to the federal awarding agency include all activity of the reporting period, are supported by underlying accounting or performance records, and are fairly presented in accordance with program requirements?	Y	N	
26. Subrecipient Monitoring – Does an effective system of internal controls exists to provide reasonable assurance that: a. Federal award information and compliance requirements are communicated to subrecipients b. Subrecipient performance is monitored c. Subrecipient audit findings are resolved, and the impact of any subrecipient noncompliance on the pass-through entity is evaluated d. A risk assessment of the subrecipient is performed e. Subrecipient eligibility is assessed	Y Y Y Y Y	N N N N N	
27. Time-keeping – Does an effective personnel time system exists which has the capability to create periodic reports of activities and time of each employee whose compensation is charged to a project that employee works on, including each Federal assistance program?	Y	N	

Information & Communication

Questions	Please respond "Y" or "N"		Comments
28. Are external and internal Communication channels established between organization and (1) federal agency, (2) state agencies, (3) sub-recipients and (4) contractors and vendors and (5) other stakeholders?	Y	N	
29. Is information related specifically to federal fund awards (including grant agreements, program guidelines, legal requirements, required reporting and other requirements), communicated to relevant internal and external stakeholders?	Y	N	
30. Does the organization have management, information and accounting systems in place that are designed to meet all federal and grant specific program requirements, including reporting and record retention requirements?	Y	N	
31. Do information systems policies and procedures exist for the safeguarding of data, including personally identifiable information (PII), authorization and addition of system users, termination of user rights, information back-up and recovery, and retention and destruction of data?	Y	N	
32. Is access to data, including PII, protected against unauthorized access and limited to appropriate individuals based on job functions?	Y	N	

Monitoring

Questions	Please respond "Y" or "N"		Comments
33. Are the associated grant fund operations regularly assessed by an internal auditor, Inspector General and/or external audit function (Uniform Guidance audit)?	Y	N	
34. Does the organization formally respond to all internal audit, Inspector General and external audit findings in writing and make timely remedial actions/corrections?	Y	N	
35. Does management periodically review all reports, deliverables, expenditures, and other requirements related to federal grant programs to ensure that guidelines and requirements are being met?	Y	N	

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CERTIFICATION OF APPLICANT'S AUTHORIZED OFFICIAL (REQUIRED)	
I certify that the statements made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under the applicable law.	
Name of Authorized Official	
Title of Authorized Official	
Signature	
Date Signed (mm/dd/yyyy)	