OVERVIEW

The Iowa Grid Resilience Fund supports efforts to improve the all-hazards resilience of the electric grid and reduce the frequency and duration of outages. The program provides subawards to eligible entities to address current and future resilience.

The Iowa Energy Office, housed within the Iowa Economic Development Authority (IEDA), will administer the program with funding from the U.S. Department of Energy (DOE), which was authorized through the Infrastructure and Investment Jobs Act (IIJA), otherwise known as the Bipartisan Infrastructure Law. The DOE's Grid Resilience Formula Grant Program provides funding to States & Indian Tribes for five years to implement projects that will improve the resilience of their electric grids. The DOE's award to IEDA includes two fiscal year formula allocations.

The Iowa Grid Resilience Fund will accept applications in IowaGrants.gov. Deadlines will be provided on the program webpage at iowaeda.com/iowa-grid-resilience-fund.

POLICIES AND PROCEDURES

The policies and procedures handbook for the Iowa Grid Resilience Fund provides the requirements and framework of how the program will be administered. This document will be reviewed and updated as needed. Additional guidance will be provided on the program webpage, including frequently asked questions. The intent of this document is to prepare potential applicants and subawardees to participate in the program and highlight the most useful information for planning purposes. Further information will be provided as successful applicants progress through the process. Applicants are encouraged to review the DOE Special Terms and Conditions, which will be included in subaward agreements. Additional guidance from the DOE will further shape the program's requirements and administration. Applicants are encouraged to monitor the Iowa Grid Resilience Fund webpage for any updates to this program handbook.

PROGRAM DETAILS

Funding Available

Approximately $13 million is available in the program per the terms of IEDA's assistance agreement with the DOE, effective June 15, 2023. IEDA plans to apply for additional funding as the DOE makes it available through the statutory appropriation from the IIJA through federal fiscal year 2026.

Iowa Program Objectives

IEDA established four objectives for the Iowa Grid Resilience Fund to guide investment decisions.

1. **Increase grid resilience:** Undertake preventive actions to strengthen the grid against severe weather and improve asset management through evaluation and monitoring.

2. **Facilitate faster service restoration:** Initiate measures or training to accelerate restoration following outages.

3. **Benefit underserved:** Provide benefits to vulnerable and disadvantaged populations to reduce the impact of severe weather-related outages.

4. **Expand workforce:** Increase opportunities for a skilled workforce to secure and retain quality jobs improving the resilience of Iowa's electric grid.

Eligible Entities

IEDA will accept applications from electric grid operators, generation and transmission owners and operators, and distribution providers. Within the context of Iowa's electric infrastructure owners and service providers, these will include Iowa's electric investor-owned utilities, municipal utilities, transmission owners and operators, and rural electric cooperatives that provide generation, transmission, and/or distribution in Iowa. An application from an ineligible entity could proceed through the review process and if it scores high enough, the DOE will make the final decision about the project and applicant eligibility. IEDA encourages organizations not reflected on the eligible entity list to contact the IEDA program manager prior to applying.

Cost Share

Applicants are required to provide cost share to the federal investment in their project. IEDA is also providing cost share at 15% of the federal amount. The cost share percentage differs based on size of the utility/applicant and their electricity sales.

- For applicants that sell over 4 million megawatt hours (MWh) of electricity per year, cost share must be at least 100% of the federal amount. Applicants in this category providing the minimum required cost share could have approximately 53% of their project cost covered by state and federal funding through this program.

- For applicants that sell less than 4 million MWh of electricity per year, cost share must be at least 33.34% of the federal amount. Applicants in this category providing the minimum required cost share could have approximately 77% of their project cost covered by state and federal funding through this program.

Applicants are required to complete a spreadsheet template developed by IEDA and available at IowaGrants.gov to determine cost share amount, state cost share amount and federal amount. The subaward amount, if selected and approved for funding, is a total of both the federal amount and a state cost share. The minimum subaward amount is $200,000 and the maximum is $2 million.

Cash investment into the project at the required ratio over the duration of the project is the preferred form of cost share. In-kind cost share is allowable for applicant personnel performing administration or construction needs of the project.

Eligible and Ineligible Activities

Awarded applicants will be required to report on metrics and cost updates specific to each activity or technology in quarterly and annual reports. Applicants may want to focus projects on one or a limited number of technologies and activities to streamline the subaward reporting, which requires separate tracking.

Eligible Activities

The funding provided through this program may be used to implement a wide range of resilience measures intended to mitigate the impact of disruptive events, including:

- Weatherization technologies and equipment
- Fire-resistant technologies and fire prevention systems
- Monitoring and control technologies
- Undergrounding of electrical equipment
- Utility pole management
- Relocation of power lines or reconductoring of power lines with low-sag, advanced conductors
- Vegetation and fuel-load management
- The use or construction of distributed energy resources for enhancing system adaptive capacity during disruptive events, including microgrids and battery-storage subcomponents
- Adaptive protection technologies
- Advanced modeling technologies
- Hardening of power lines, facilities, substations of other systems
- Replacing old overhead conductors and underground cables
- Training, recruitment, retention and reskilling of workers in order to perform the work required for the resilience measures listed above

Potential applicants considering projects related to electricity generation or battery storage are encouraged to contact IEDA for additional guidance on these project types to ensure they are not in conflict with DOE guidance.

Ineligible Activities
Program funds may not be used for:

- Construction of a new
  - Electric generating facility, defined as construction of a facility that produces electricity, including emergency back-up generation, solar generation or any other electric generation unit or facility.
  - Large-scale battery storage facility that is not used for enhancing system adaptive capacity during disruptive events.
- Cybersecurity

Eligible and Ineligible Costs
The example eligible and ineligible costs listed below are not intended to be inclusive of all potential costs. Applicants are encouraged to contact IEDA when developing a program budget to discuss eligibility of other costs.

Eligible Costs
Examples of eligible costs include:

- Independent audits when required for 2 CFR 200.501 and Subpart F.
- Contractual professional services for administration of the award including tasks such as compiling and submitting claims, reviewing payrolls for compliance with Davis Bacon and Related Acts, ensuring proper procedures and documentation for procurement activities, etc. The maximum that can be charged for administration is 10% of the subaward amount.
- Costs associated with preparing the application incurred after June 15, 2023 (representing the date of the DOE and IEDA assistance agreement), and totaling no more than 5% of the subaward amount. Examples may include engineering expenses to determine probable costs and scope or grant writing services.

Ineligible Costs
Examples of ineligible costs (as stipulated by the Administrative and Legal Requirements Document by the DOE for assistance listing number 81.254) include:

- Activities that encourage or support political activities such as the collection and dissemination of information related to potential, planned or pending legislation.
- Activities that directly or indirectly support or oppose union organizing.
- Costs incurred prior to June 15, 2023.

TIMELINES
Applicants should contact IEDA if they have any questions regarding the timeframe and activities associated with beginning work on their project. Activities and expenses prior to an executed agreement with IEDA are at the applicant's own risk and may conflict with federal requirements. Applicants are encouraged to postpone all project activities not associated with preparing an application until guidance is available post-award.

The timeline below outlines the activities and corresponding dates for the program's first application cycle. IEDA anticipates the second application cycle to occur in the spring of 2024. Applicants should monitor the program webpage for ongoing updates and information.

Activity	Estimated Date
Application posted on IowaGrants.gov Program information available on Iowa Grid Resilience webpage	December 7, 2023
Webinar for program and application details via Microsoft Teams	December 18, 2023
Application deadline	February 15, 2024
Preliminary selection by IEDA	March 28, 2024
Additional information required to provide to DOE	April 18, 2024
Response from DOE and anticipated subaward notices	July 2024
Training for subaward administrators *(Date will be confirmed once DOE provides detail on when they may complete their review)*	August 2024

Subaward agreements will be for a duration of three years unless otherwise approved by IEDA with the potential to be extended to five years when adequate justification and progress on the project exists. Extensions beyond the five years are subject to approval by the DOE. Any substantive change to a project will require an amendment and may be subject to both IEDA and DOE approval. To capture the long-term project impact, IEDA will evaluate approaches to collect outage data for one or more years after the project is complete.

APPLICATION PROCESS

Applications will be available and accepted through IowaGrants.gov. The application will collect information necessary for evaluation in addition to other data to be used for reporting or compliance purposes after subawards are made.

- Applications will only be accepted during the established application periods, as identified on the program webpage and iowagrants.gov. IEDA plans to administer one application cycle in the fall of 2023 and another in the spring of 2024 utilizing its forthcoming fiscal year 2024 allocation. Applications received outside the designated windows will be rejected by IEDA.

- Applicants planning to apply must either already have an IowaGrants account or create one. The IowaGrants account will be used for claims and reporting for approved subawardees; therefore, the individual registering for IowaGrants on behalf of the applicant should be prepared to also conduct post-award reporting, if applicable. More than one registered individual can have access to the IowaGrants account for the project.

    – If the person completing the application already has an account through IowaGrants or a State of Iowa A&A account, the same account will be utilized.

    – If the person completing the application does not have an account, the applicant will need to allow a minimum of two weeks to register and activate their account.

- Applicants should obtain a Unique Entity Identifier (UEI) from the federal System for Award Management (SAM), if not already obtained. This process may take several weeks and applicants are encouraged to start the SAM registration process as soon as possible. If entities have technical difficulties, they are encouraged to utilize the help feature on SAM.gov.

- Applicants are encouraged to ask IEDA all related questions at least three business days prior to the application deadline.

Once the submission deadline has closed, IEDA will review the applications for eligibility and completeness.

- Incomplete applications that are missing required information or attachments will not be scored.

- Once an application is submitted for review, applicants will not be able to amend or correct information in the application. It is imperative that applicants review all information and ensure required attachments are included with an application before submittal. IEDA may request clarifying information during its review to supplement what has already been submitted. This may include allowing applicants to upload supplemental information in iowagrants.gov upon request from IEDA.

Examples that could deem an application to be ineligible, incomplete or disqualified include, but are not limited to:

- Applicant does not have individuals or service providers identified to assist with administration and compliance.

- Applicant does not provide sufficient documentation to verify the availability of cost share.

- Applicant submitted more than one application in a funding cycle.

- Applicant has a pending or approved award for the same project as the DOE Grid Resilience and Innovation Partnerships FOA or the project is otherwise duplicative of other federal funding.

- Project was already expected to be completed by the applicant without funding from this program.

- Applicant has been debarred or suspended as identified in the SAM as determined by the UEI number for the applicant.

IEDA may, but is not required to, contact applicants for more information on any of the potential flagged concerns listed above prior to denial. IEDA staff will review the applications and may engage outside reviewers to assist and provide expertise. Applications will be evaluated using the information provided. Evaluation criteria will be used to score the presence and quality of desired application content, including attachments and narrative responses provided. A minimum score of 48 out of 80 total points will be necessary to be considered for funding. Evaluation criteria weighting may change in future rounds to ensure Iowa is adequately fulfilling the program objectives.

Evaluation Criteria

Criteria	Indicators	Maximum Points
Administrative Support	Applicant has identified subaward administrative personnel	6
	Qualifications of applicant's administrative personnel (1)	
Financial Need	Applicant demonstrates why funding from this program is needed	8
Previous Funding	Extent to which the applicant has not previously been awarded under the Iowa program (all new applicants get max points)	10
Compliance Approach	Applicant demonstrates understanding of program and federal requirements	6
	Applicant identified legal counsel or otherwise credentialed professionals to assist	
	Project is clearly categorically excluded from NEPA review (2)	
	Applicant has a clear plan for ensuring the project adheres to cybersecurity requirements and best practices	
Grid Improvement	Project's reduction in frequency, duration and/or consequences of outages	10
	Utilization of historical outage data in targeted area compared to system average to target improvements	
	Project type directly enhances monitoring, control and visibility of the grid	
	Project has a technically sound approach, which includes integration into existing systems and is replicable at a larger scale	
	Project measure reduces risk through robustness, redundancy, rapid detection/recovery, protection from cold weather, floods and wind	
Technological Innovation	Applicant plans to utilize technology that is new to their Iowa service territory in the project	10
	Applicant plans to utilize early commercial stage of technology with new and novel benefits	
	Applicant has identified expertise to implement and manage technologies	
	Project represents a model with potential for replication	
	Applicant is collaborating with other eligible entities in the project	
	Applicant plans to share lessons learned from the project	

Criteria	Indicators	Maximum Points
Project Schedule	Project schedule is clearly articulated and reasonable	6
	Timeliness of project completion and benefits realized	
	Applicant has identified implementation risks with sound strategies to mitigate them	
Community Benefits and Engagement	Project alleviates safety risk associated with deteriorating existing infrastructure	10
	Project benefits significant number of customers or most of the applicant's service territory	
	Extent to which the project has a demonstrated cost effectiveness per customer benefited backed by a clear methodology for determining it	
	Project benefits critical facility/facilities (3)	
	Applicant has previous and/or planned community engagement and demonstrated support	
	Project delivers additional benefits to the community and grid beyond resilience, such as better enabling distributed generation or business attraction and retention	
Benefit to Underserved	Applicant has identified an underserved community (4)	8
	Project benefits reach disadvantaged community census tract as identified by the federal CJEST tool (5)	
	Extent to which underserved community benefits from the project	
Workforce Development	Application includes a detailed strategy to ensure adequate workforce	6
	Application includes a financial commitment to invest in workforce development	
	Project will enhance workforce skill, recruitment and/or retention	
	Total Points Available	80

Explanation of Evaluation Criteria Indicators

(1) Qualified grant management personnel can be demonstrated in a variety of ways, but competency in federal award management is ideal. IEDA maintains a certified grant administrator directory for its federal Community Development Block Grant program, listing individuals who completed required training and testing, which may be a helpful resource.

(2) A categorical exclusion (CATEX) is a category of activities identified by federal agencies that do not have significant impacts on the environment. These are excluded from a detailed environmental analysis and are the lowest level of National Environmental Policy Act (NEPA) analysis. The final determination of whether a project is CATEX will be made by DOE during its review process. A list of these activities applicable to electrical power and transmission for DOE-funded projects can be found in section B4 of the NEPA guidelines.

(3) Critical facilities for the purpose of this program are structures that, if disrupted by power outages, would have a debilitating impact, and pose an immediate threat to public health, safety, security and community needs. Examples could include, but are not limited to, emergency operation centers, water or wastewater facilities, shelter for vulnerable populations, or hospitals.

(4) Underserved communities could be identified based on local knowledge, socioeconomic, and/or demographic information in a geographic area. For this program's purposes, underserved communities could include areas with high electricity-dependent populations for medical needs, areas with a high number of households eligible for the Low-Income Home Energy Assistance Program, or other similar concentrations of vulnerable/underserved groups as identified by the applicant.

(5) The Climate and Economic Justice Screening Tool (CJEST), developed by the White House Council on Environmental Quality, is the tool used to identify disadvantaged communities for meeting the Justice 40 initiative intended to ensure the benefits of certain federal investments reach communities that need them most.

Application Scoring

IEDA will rank applications according to their scores. The IEDA director will provide approval to proceed with preliminary selection for applications as well as final approval of all subawards.

- Applications that have met the minimum score, are not otherwise disqualified, and for which adequate funding is available will receive preliminary selection by IEDA. The highest scoring applications will be given priority for funding.

- Applications that do not receive preliminary selection by IEDA but score higher than the minimum threshold will be notified of this status if they are otherwise eligible, complete, and not disqualified for funding. Such applications may be considered for a subaward if final approval by DOE is not provided to the highest scoring applicants.

- Applications that score lower than the minimum threshold will be notified of their denial.

IEDA reserves the right to negotiate financial assistance with applicants regarding the award amount and associated scope of work limitations.

PRELIMINARY SELECTION APPLICATIONS

Applicants with projects that score high enough and receive preliminary selection by IEDA will still not be able to begin work on their project until notice from IEDA has been provided allowing them to do so. The notice from IEDA to preliminarily selected applicants will provide instructions for what is needed for IEDA to submit to the DOE for their review and final approval of the project, called the project notification package. IEDA will work with applicants to request required content for several forms that will be signed by IEDA and submitted to DOE for each project. Some content will be drawn from the applications and additional content will be needed from the following list:

- Evaluation of known infrastructure project components, documentation of compliance with, or waiver request associated with, the Build America Buy America Act

- Environmental Questionnaire, related to NEPA

- SF 424A budget information form and budget justification form

- Metrics that will be collected and reported in the quarterly progress reports to demonstrate the impact of the resilience project (IEDA will consult with the applicant on the metrics selected for their project)

- Secretarial eligible entity designation request form (as needed for entities not on the eligible entity list)

The DOE may need several months to review each project notification package and may request additional information.

SUBAWARD FINAL SELECTION AND AGREEMENTS

After DOE informs IEDA that its review has been completed and any corresponding federal compliance procedures have been fulfilled, IEDA will offer a subaward agreement to each subawardee. The subaward agreement will include DOE Special Terms and Conditions as part of the flow-down requirements from IEDA's assistance agreement with DOE, which must ultimately be incorporated into any agreements the subawardee utilizes to implement the resilience project.

At the time of executing the subaward agreement, the subawardee must fulfill the first executive compensation reporting requirement, if applicable to the entity type, to enable IEDA to submit it to the federal government. See the "reporting" section for more information.

SUBAWARD ADMINISTRATOR ENGAGEMENT

Within each application for the Iowa Grid Resilience Fund, applicants must identify who will be responsible for ongoing reporting to IEDA, compliance with federal requirements, and managing other administrative tasks for the subaward. Applicants can identify an existing service provider or staff person, or plan to procure these services if a subaward is made. If the applicant intends to procure for this service, procurement and contract execution must occur before other project expenses can be reimbursed unless otherwise approved by IEDA to proceed. It is imperative that applicants factor in the time and duration of assistance needed from the subaward administrator over the duration of project implementation and the agreement with IEDA. The administrator role consists of the following responsibilities, including but not limited to:

- Coordinate day-to-day activities associated with the subaward on behalf of the subawardee, and be a primary point of contact with IEDA.
- Manage immediate post-award activities: confirm any NEPA/environmental review documentation is included, ensure the subawardee has adopted the proper policies and required documents, and establish recordkeeping procedures that will be monitored and maintained by the subawardee and administrator.

- Maintain the subawardee's IowaGrants.gov account for reporting, submitting required documents and status updates, and reimbursement claims.
- Complete quarterly and annual reporting on the subaward.
- Complete reimbursement requests to IEDA, including collecting and submitting source documentation such as invoices, compliance certifications, and other information required by IEDA or DOE.
- Monitor project activities and integrate procedures to ensure compliance with all program requirements. This includes, but isn't limited to, following procurement procedures, labor standards, Build America Buy America Act (BABA) and Davis Bacon Act compliance. A couple of items of note:
  - DOE will be requiring utilization of a new online platform for uploading weekly payrolls as part of the compliance with the Davis Bacon Act and paying prevailing wages. DOE has not yet released information about this platform and associated expectations but has indicated that information will be available by the end of calendar year 2023.
  - As stated in the DOE Special Terms and Conditions in the subaward agreements, the Build America Buy America Act requirement is in effect so that, to the greatest extent possible, all equipment and products purchased with funds made available under this award should be American made. Administrators will need to be closely involved with procurement and review of required compliance certification documentation related to purchases. Subawardees are expected to ensure that procurement of equipment and products under subawards include language approved by IEDA for BABA compliance. If BABA-compliant project components are not available, and the subawardee provides information to the satisfaction of IEDA that the sufficient efforts were made to conduct market research and procure compliant products, the subawardee and IEDA must request a BABA waiver and pause additional procurement steps until the outcome of the waiver request is known.

- Maintain knowledge of project status and be able to provide updates per request of IEDA and DOE. The administrator will contact IEDA with any issues or questions to ensure the project moves forward successfully.

- Ensure all costs are incurred prior to the agreement end date and final claims are submitted by the timeframe indicated in the subaward agreement. The administrator will also assist with submitting extension and amendment requests to IEDA.

IEDA will conduct trainings for subaward administrators with the expectation that each subawardee will have their administration representative(s) attend. The trainings will provide guidance on fulfilling the responsibilities described above and compliance with state and federal requirements. IEDA will provide an Iowa Grid Resilience Fund Management Guide for subaward administrators, which will include links to additional training and references for federal requirements, guidance on how to complete required procedures such as IowaGrants.gov claims, and templates and example forms to utilize for record maintenance. Subawardees are also encouraged to consult with their legal counsel regarding compliance with the subaward agreement with IEDA and federal requirements.

DISBURSEMENT OF FUNDS

Disbursements will be made on a reimbursement basis. No advance disbursements will be allowed. Claims must be for an amount equal to or greater than $2,000 per request. All claims must be made through IowaGrants.gov with required supporting documentation and must be submitted on a quarterly basis while expenses are being incurred.

REPORTING

IEDA is required to submit quarterly and annual reports to DOE, which must include reports on active and open subawards. Report date ranges will follow the federal fiscal year which is October 1 through September 30 of the following year. Subawardees are required to submit quarterly and annual reports to IEDA with the required content. Failure to submit reports by the established deadlines may result in termination of the subaward agreement.

Quarterly Report Timeframes

Federal Fiscal Year Quarter	Quarter Date Range	Report Due to IEDA
Quarter 1	October 1 – December 31	January 10
Quarter 2	January 1 – March 31	April 10
Quarter 3	April 1 – June 30	July 10
Quarter 4	July 1 – September 30	October 10

Quarterly reports will be submitted to IEDA via IowaGrants.gov. These reports will include some information that was already conveyed in the initial application to IEDA, in addition to several other topics. The quarterly report will identify several topic areas that are established in the first report, remain in subsequent reports and be updated each quarter. More detailed instructions on reporting will be provided to subawardees after award, but the following list is a summary of the quarterly information required:

- Benefits and accomplishments: Identify type of benefit(s) to the grid and provide description, accomplished work during reporting period and planned work for the next.

- Budget: Use the budget provided in the application, identify costs incurred to date and in the reporting period using information available at the time of the report. This information is separate from what is submitted in requests for reimbursement and referred to for auditing purposes.

- Milestones: Utilize project milestone table in application, and identify planned and actual completion date and relevant status information.

- Build metrics: Track and report on build metrics, which track what recipients spend program funds on. For example, if a project is hardening a substation, build metrics will track the number and type of hardware changes being made. Build metrics for each subaward will be clarified after preliminary selection and during the development of the project notification package to DOE.

- Risk management: Identify potential internal and external risks that relate to the resilience project, their potential impact and mitigation strategies.

IEDA will review the quarterly report submittal in IowaGrants.gov and correspond with the subaward administrator with any questions or additional information needed prior to the submittal to DOE.

Annual Report Timeframes

Report Date Range	Report Due to IEDA
Project start date through September 30	October 10
October 1 – September 30 for each fiscal year while the project is underway	October 10
Post-project completion reports on impacts	To Be Determined

Annual reports are due to IEDA by October 10 of each year of the open subaward to capture impacts of the project. Annual reports will be submitted to IEDA via Iowagrants.gov. The first quarterly report will include baseline impact metrics on outage data available from the subawardee for the years 2017 through 2023 to the extent available. Not all subawardees will have information to report in each of the sections as the annual reports address data points common in many BIL-funded programs from DOE. Information which will be updated in each annual report for the current fiscal year includes:

- Outage data: The annual reports will require outage data from subawardees on the area applicable to the project, utilizing specific questions from DOE.

- Job creation and training: Identify workforce related outcomes such as the type of training provided, underserved populations served by trainings, utilization of apprenticeship programs, and partnerships with community-based organizations.

- Workforce demographics: Provide demographic data for everyone included on the project at the subawardee staff level and contractors.

- Community engagement activities and events: Identify attributes or outcomes such as any agreements that may exist for the project with community organizations or leadership, demonstration of support or input received from residents, events or other types of engagement, participants, and outcomes.

IEDA will review the annual report submittal in IowaGrants.gov and correspond with the subaward administrator with any questions or additional information needed prior to the submittal to DOE.

MONITORING AND COMPLIANCE

In addition to reviewing quarterly and annual reports, IEDA will provide other monitoring, oversight and technical assistance through the duration of the subaward agreement. The methods IEDA will use to evaluate compliance will be outlined for subawardees prior to utilization. As additional federal guidance is developed and disseminated, IEDA will continue to inform its subawardees about pertinent updates. This may include periodic monitoring or spot-checks for certain documentation being maintained by the subawardee that correlates with federal requirements. IEDA will also assist the DOE with any questions or follow up based on quarterly or annual report information submitted. IEDA may conduct a site visit of projects to ensure they were built as proposed and provide verification of ongoing operations and maintenance. IEDA will notify the subaward administrator at least seven business days in advance of a site visit.

CLOSEOUT PROCEDURES

After the final claim has been processed, IEDA may conduct a closeout monitoring and audit of the project. If a balance remains after the final claim has been received and payment has been made, the unused funds shall be deobligated. Upon satisfaction of all program requirements, IEDA will provide a final closeout notice stating the funds have been spent in accordance with the agreement.

TO LEARN MORE

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