

We are All in this Together

Collaborations on Fiscal and Grants Management

Angela Ash, CPA, CGMS Jeff Cheek, MCP Bridget Harris, MSW, CPM





Angela Ash, Jeff Cheek, and Bridget Harris have no financial interest to disclose.

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Learning Objectives



- At the conclusion of this presentation, participants will be able to:
- 1. Identify attainable goals and strategies to improve grants management activities
- 2. Pinpoint effective methodologies for conducting Fiscal Site Visits and Risk Assessments.
- 3. Identify opportunities for Fiscal collaboration and partnership throughout the grant lifecycle.

Agenda





01 OVERVIEW: History. Org Chart. Roles and Responsibilities.

D2 AWARD SET-UP: Kickoff. Load budget. HR approvals. Time Allocation. Risk Assessment.

03 AWARD MANAGEMENT: Conditions. Contract Management. Budget Revisions. Site Visits. **04** AWARD CLOSE-OUT: FFR/UOB. Conditions of Award. Single Audit.

05 CONCLUSION: Website. Contact Info. Q&A.

Overview



01

- History
- Org Chart
- Roles and Responsibilities
- Grant Lifecycle

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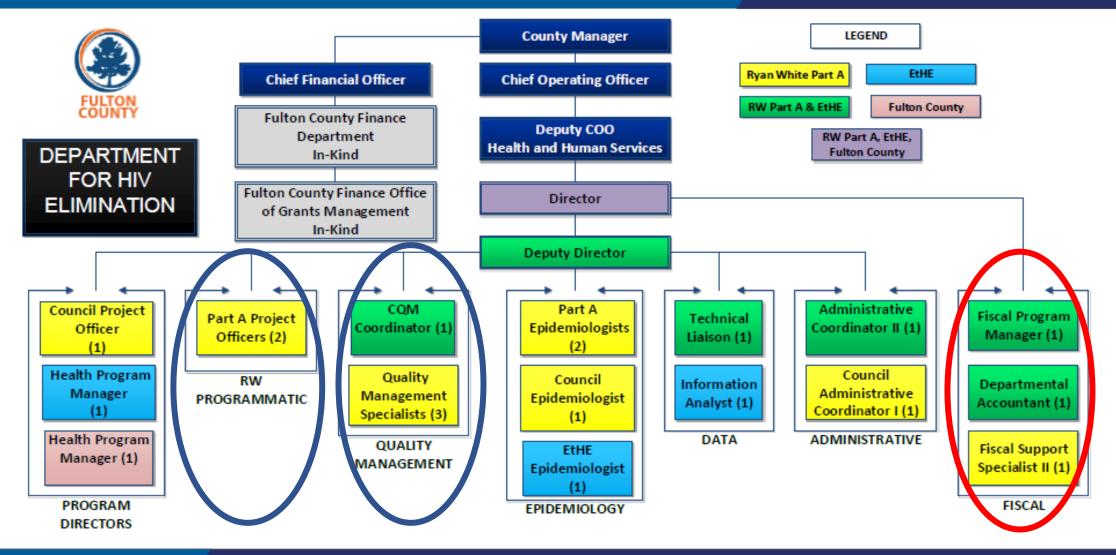


- Fulton County Recipient of RWHAP funding for 20-county EMA since 1991 Currently resides with Department for HIV Elimination (DHE). Responsible for administration of Part A, Ending the HIV Epidemic, Capacity Building, CARES Act grants, and County's local and regional HIV planning efforts.
- Grants Administration Division (GAD) of the Finance Department was expanded in 2015 as a result of the Uniform Grant Guidance (2 CFR 200 and 45 CFR 75) and implementation of County Shared Services. They provide guidance and support to ensure fiscal compliance with regulations.



Organizational Chart: DHE

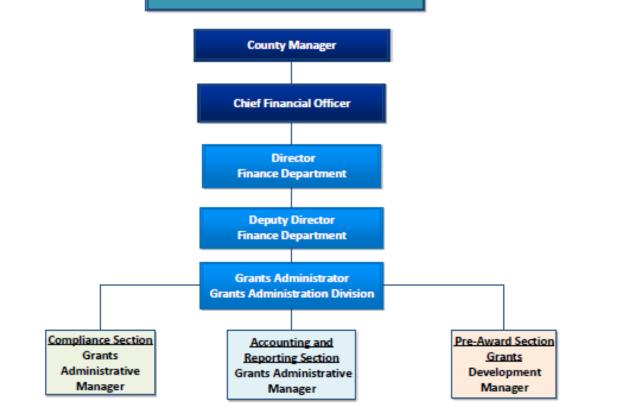




Organizational Chart: GAD



GRANTS ADMINISTRATION DIVISION





Grant Lifecycle





Close-Out

FFR. UOB. Audit.



Pre-Award

Application development. Application submission.

Award Set-Up

NOA. Establish budget. Vendor selection. Enter into contracts.

Manage Award

Program monitoring. Conditions of award.

Award Set-Up



02

- Kick-off
- Load budget
- HR approvals
- Time Allocation
- Risk Assessment

Award Set-Up





- Kick-Off Meeting GAD hosts DHE, Finance, HR, Purchasing
 - Identify Tasks, Lead Time, Target Dates, Resources Needed, Responsible Party, Date Completed
- Budget Set-Up DHE establishes. GAD loads into AMS.
 - By Fund e.g. Formula By Unit e.g. PC Support
 - Payroll Analysis DHE establishes. GAD verifies funding
- Time Allocation DHE establishes. GAD verifies funding.
- Risk Assessment

Risk Assessments



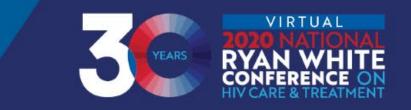
- A risk assessment is performed at the pre-award stage to determine the funding amount and in the post-award stage to determine the type of monitoring plan
- Technical review to determine whether the agency can deliver the work
- Financial review to determine if the agency can manage the funds
- Internal control review to determine if the agency has processes in place to mitigate fraud, waste, and abuse

Risk Assessment: RFP



- Does agency have a Financial Operations Policy and Procedures Manual? (Note: A copy will need to be provided to the Part A Program before entering into a Part A contract).
- 2. What kind of accounting system does your agency use?
- **3.** How does applicant maintain internal controls to assure that it is managing Federal awards in compliance with applicable laws, regulations and the provision of contracts or grants?
- 4. How does your agency determine and track the allocation of employee's personnel expenditures when employees are engaged in activities supported by several funding sources?
- 5. What method do you use to allocate salaries and fringe to multiple contracts?
- 6. How does your agency determine what is an allowable Ryan White cost, including administration costs?
- 7. What is your agency's policy/procedure on issuing cash payments to clients? Is this a written policy?
- 8. How does your agency ensure that its budgets and expenses conform to federal OMB cost principles?
- 9. How does your agency ensure fiscal staff is familiar with applicable federal regulations?

Risk Assessment: RFP



- 10. Does your organization have controls to prevent expenditure of funds in excess of approved, budgeted amounts? Briefly describe.
- **11**. Are all bank accounts reconciled monthly?
- 12. Does agency have an allocation journal which contains the methodology that the entity uses to allocate costs? For example, the journal would document that salaries are allocated based on a time study, billable hours, or some other methodology; facilities expenses are based on square footage or percent of 2 full time equivalents (FTE); etc. The allocation journal should contain written procedures that are easy to follow and can be "re-performed" by an auditor. Briefly describe.
- **13.** Are there procedures to ensure procurement at competitive prices? Please provide overview.
- 14. Does your agency receive an independent audit or a single (previously A-133) audit?
- **15**. When was your last audit or financial statement?
- **16**. What findings were noted? What steps were taken to correct the finding?
- 17. Describe agency's policies and procedures that guide the selection of an auditor

Risk Assessment Matrix





CATEGORY	Lower Risk	Medium Risk	Higher Risk
Facilities & Infrastructure	Work occurs in adequate, established space at subrecipient's facility	Some work done at Fulton County Facilities	Subrecipient's resources & facilities are inadequate, requiring that work occur at Fulton County facilities
Maturity of Organization	Mature (e.g., > 10 years)	Mature, but not grant or project oriented	Start up, no fiscal controls in place yet
Organization Type	Government, university or non profit (Collegial Terms & Conditions)	University or non profit with more restrictive Ts & Cs (e.g., state regulations).	Industry organization
Award Type	Grant from federal or non commercial source	Coop agreement or grant with special conditions	Contracts and contracts with subcontracts
Rate of Subrecipient Spending on Award	Pace of spending is consistent with budgeted amounts per year	Pace of spending slightly accelerated or decelerated compared to projections	Spending either far outpaces or is far less than projected in submitted budget

Risk Assessment Matrix





CATEGORY	Lower Risk	Medium Risk	Higher Risk
Amount/% of Award Subcontracted	Lower funding levels or % of total funds allocated to subrecipient (e.g., <\$50k)	Funding is a large part of smaller award	Funding level >\$100k or >49% of award
Accounting/ Procurement System	Systems have been approved (existing audit is an indicator)	Systems less qualified to handle large amounts of federal money (Audit conducted, but not required by UG Audit Requirements)	No systems are in place, or systems are new
Negotiated Indirect Cost Rate Agreement	Has annual audit as required by UG Subpart F	Has annual third party financial audit	Has not had an annual financial audit
Prior experience with County	Previous positive experience as County subrecipient	Previous experience as County subrecipient, but may have minor concerns	New subrecipient or previous negative experience

Risk Assessment Matrix





CATEGORY	Lower Risk	Medium Risk	Higher Risk
Difficulty of Scope of Work & Deliverables	Report only easily met objectives)	Possibility of change in scope or collaborative work scope	Tangible products, deliverables necessary to achieve project success
Transparency/ Frequency of Reporting	Frequent reporting or easily assessed progress based on milestones or outcomes)	Some reporting during the project, some measurable or observable milestones or outcomes	No reporting until the end of the project, no measurable or observable milestones or outcomes
Audit Restrictions	Auditors are able to perform testing on all awards	Auditors can perform testing on only part of portfolio, but other auditing or reports provided	Subrecipient places restrictions on auditors due to status as Federally Funded R&D Center
Cost Sharing	Subrecipient has made no commitment to share costs	Subrecipient has committed to share some costs	Subrecipient has committed to fund costs not paid by the County subaward

Risk Assessment

LOWER RISK



Review audit reports

• Review invoices to ensure:

- Timeliness, completeness and accuracy
- Activities are in line with spending
- Program Manager approval states "okay to pay"
- Work is performed within the period of performance
- Compliance with special terms (if applicable)
- Review progress reports to ensure:
 - Timeliness and completeness
 - Activities correspond with Scope of Work
 - Deliverables met
 - Compliance with special terms
- Conduct annual site visit report and/or desk audit
- Maintain regular contact

VIRTUAL

Risk Assessment



Review all steps in the "Lower Risk" category in addition to the following:



- If findings exist in the subrecipient's audit report, require a corrective action plan and monitor resolution of findings
 - Request and monitor invoices more frequently (monthly v. quarterly)
 - Request and review progress reports more frequently (monthly v. quarterly)
- Increase the frequency of regular contact (weekly v. biweekly)

Risk Assessment





Review all steps in the "Lower Risk" and "Medium Risk" categories in addition to the following:

- Conduct more frequent site visits or desk audits
- Request sub-ledgers, invoices or other supporting documentation for all expenditures
- Document conversations and retain pertinent emails
- Elevate potential risks to Compliance Unit for discussion for possible additional monitoring activities

Award Management





03 • Conditions of Award • Contract Management • Budget Revisions • Site Visits

Award Management



- DHE responsible for day-to-day management of the award:
 - Vendor Selection/Contracting
 - Invoicing and Budget Monitoring
 - Budget Revisions
 - Conditions of Award
 - Quarterly Reports
 - Spend Plans
 - Compliance with HRSA's Programmatic and Fiscal National Monitoring Standards

GAD team responsible for:

- Submitting monthly drawdowns in Payment Management System (PMS)
- Ensuring the PMS reconciles with the General Ledger
- FFATA Reporting
- DHE and GAD responsible for:
 - Fiscal Site-Visits
 - Compliance with Uniform Guidance

Subrecipient Monitoring



Monitoring is accomplished in two ways:

- 1. Through regular and routine desk audits (DHE Lead Role)
- Examine contracts, related correspondence, requests for reimbursements, budget revisions and other appropriate documents
- Check to ensure expenditures are allowed
- Test several employees in a pay period for correct calculations
- Review policies and procedures submitted by subrecipients
- Review of audit/independent financial statement
- Policy which forbids use of Ryan White funds for cash payments to service recipients/clients

Subrecipient Monitoring



2. Through fiscal site visits (DHE & GAD)

The monitoring standards for Ryan White Part A recipients require, at a minimum, an annual comprehensive monitoring site visit to each subrecipient. U.G. 200.331 also requires an annual evaluation. (HRSA has waived site visit requirement for 2020 due to COVID-19).

Our processes related to subrecipient monitoring are set forth in our local P&Ps:

- Fiscal Policy and Procedure Notice **FPPN-017 Fiscal Monitoring and Site Visits**
- Programmatic Policy and Procedure Notice PPPN-034 ANNUAL PROGRAMMATIC SITE VISITS
- Programmatic Policy and Procedure Notice PPPN-064 Corrective Action Plans

Available at: www.ryanwhiteatl.org

Subrecipient Monitoring: Areas Reviewed

VIRTUAL 2020 NATIONAL RYAN WHITE CONFERENCE ON HIV CARE & TREATMENT

- Accounting Practices and Procedures
- Limitation on Uses of Funding
- Allowable/Unallowable Costs
- Program Income
- Imposition and Assessment of Client Charges

- Procurement
- Allocations
- Auditing Requirements
- Property Standards
- Cost Principles: Effort Reporting & Compensation

Example: Accounting Practices & Procedures



Test: Subrecipient has an accounting system established and maintained according to Generally Accepted Accounting Principles (GAAP)

Performance Measure:

- System must be established to enable tracking of funds.
- Development and consistent implementation of policies and procedures that establish uniform administrative requirements governing the monitoring of awards.
- Review of the following fiscal monitoring documents and actions:
- Fiscal monitoring policy and procedures
- Fiscal monitoring reports
- Do fiscal program policy and procedural manuals meet Federal and local requirements?
- Are there established policies and procedures to ensure compliance with Federal and programmatic requirements?
- Are expenditures for each line item reasonable and show progress to expenditure of total annual allocation?

Example: Accounting Practices & Procedures



<u>Agency Responsibility (Items will be reviewed in fiscal site visit)</u>:

- Are staff trained on and have access to current federal policies, procedures and instructions on accounting for and expending Federal funds?
- How are the award funds identified and tracked in the accounting system?
- Are accounting records supported by source documentation? Canceled checks, Payroll, Invoices
- Are there controls in place to preclude: Over-obligation, Under/overstatement of obligations, Duplicate payments, Inappropriate charges
- Is staff knowledgeable of the requirements for determining activities and costs allowed and costs unallowed?
- Is there adequate segregation of duties for: Reviewing transactions, Verification of transactions
- Does the subrecipient use the same policies and procedures for and expending funds? Federal, State
- Do financial reports contain expenditures by service category and use of Ryan White funds as specified by RWPA?

Subrecipient Fiscal Compliance Review Form: Pre-Site Visit

Review Date:		Review Period:					
Subrecipient Name	e:	Grant Period: Grant Budget:					
	Name	Title	In Attendance:	Yes	No		
Subrecipient							
Representatives							
/Contract Designees							
Fulton County	Name	Title	In Attendance:	Yes	No		
Representatives							
Representatives							

Pre-Site Visit		
Desk Review	The documents requested from the organization should be reviewed prior to the visit to make sure that all documents have been provided as requested. If there are any items missing, an email must be sent to the subrecipient with a list of the items that need to be sent and a deadline to return that allows time for review prior to the site visit. The initial desk review of compliance is completed using this information. If there are any questions or irregularities, they should be recorded and reviewed with the subrecipient during the site visit. Additional documents should be requested to be available for the site visit to confirm any patterns of non-compliance if material exceptions are founds.	
STEPS	Verify that the subrecipient has Policies and Procedures. Check off documents listed on Pages 2 & 8 Review Financial Statement Audit and Single Audit. If there are past findings note the corrective action plan. Select samples from employee list, program income clients, pre-paid benefits, and contracts. Send selection to the subrecipient contact with the date for them to return the backup, prior to the site visit.	Request from RWPA Request from RWPA Request from Subs

Preparation – Send request promptly to the subrecipient fiscal contact							
SAMPLE SELECTION:	SAMPLE SELECTION: A. Select 2 to 10 employees (direct and indirect/staff and management). Request timesheets and payroll						
(Prep for on-site review)	registers for the review period.						
	B. Review 3 Cumulative Contract Expenditure Reports (CCER) and 3 additional recurring and/or high dollar	Onsite – RWPA					
	transactions. Request invoices, all payment back up, support for shared cost splits (if applicable).						
	C. Select 10 Program Income clients. Request qualification, billing and payment posting information	Program Client list - RWPA					
	D. Select 3 Pre-Paid beneficiaries. Request financial tracking and receipt verification support documents.	Complete Sample D Worksheet					
	E. Select 2 vendor or sub-subrecipient contracts from transaction detail or backup. Request contract copies.						

Available at: www.ryanwhiteatl.org

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Subrecipient Fiscal Compliance Review Form: Pre-Site Visit

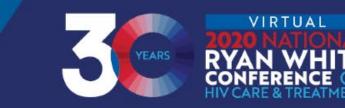




RWPA Pre-sul								
Reporting – R	eview of C	umulative Contract Expenditure Reports a	and other required reporting					
		How many Cumulative Contract Expenditure Reports were submitted on time? (Test						
Monthly Invo	ice							
(CCER)		How many additional information requests di			of			
Audit Status		Does the Subrecipient have a current audit or	required independent financial statemen	<u>t on file with the Ryan Whit</u>	e Office?			
Financial and Si	ngle	Yes If Yes, date submitted:						
Audits		No If No, when is the proposed sub		If yes date				
Standard		ance Measure	Agency Responsibility	Documentation	Comments			
Contractual Ob	-	olicies and Procedures						
l .		nd Procedures that enforce reliable internal to adhere to standards of :	Are the following documented:					
		part 75 – Uniform Administrative	Annual Audits	Yes				
		nents, Cost Principles, and Audit	Cash Management					
		nents for HHS Awards	Mandated Disclosure/Whistleblower	Each ca	ategory			
		I-704G – Standards for Internal Control in the	Record Retention	require	d by our			
		overnment, September 2014 (Green Book)	Personally Identifying Information	-				
		ants Policy Statement	Allowability of Costs	Fiscal I	P&Ps is			
		Policy Bulletin Number 2019-02 – Legislative s in Grants Management	Accounting System	revie	ewed			
		ederal Financial Assistance Conflict of Interest	Credit Card					
		ovember 16,2017	Program Income and Fee Policy					
	• HRSA Fi	inancial Management Requirements Guide	Bank Statements/Reconciliation	Yes				
	for Award	d Recipients	Travel Policy	Yes NA				
	Definal	and an annual strength and an and developments	Records Retention Policy	Yes NA				
		and program policy and procedural manuals leral and Ryan White program requirements?	Account Payable / Disbursements	Yes No NA				
	meet reu	is a and type white program requirements:	Accounts Receivable / Billing	Yes No NA				
		established policies and procedures to	Property Control	Yes No NA				
		ompliance with Federal and programmatic	• Time and Effort/Timekeeping Policy	Yes No NA				
	requirem	ents?	 Indirect and Direct Costs Allocation 	🗌 Yes 🗌 No 🗌 NA				
	Must poli	icies and procedures to prevent use of Ryan	 Grant Budget and Reconciliation 	🗌 Yes 🗌 No 🔲 NA				
	-	nds for cash payments to clients/service						
		s? (PCN 16-02)						
	recipients	s? (PCN 16-02)						

The relevant standards are listed along with a series of questions to be answered from the review.

Subrecipient Fiscal Compliance Review Form: On-Site Visit



Interviewees	1.	
Name and Title	2.	
1	Provide a "walk-through" of your agency's use of Federal RWPA funds. Summarize the process from expenditures to provide services to eligible clients to reimbursement request.	Document Response
2	Please identify your financial management or accounting system and how it identifies RWPA transactions.	Document Response
3	What is the approval process and authorization levels for expenditures?	Document Response
4	What is the process to verifying allowable costs?	Document Response
5	What is the general process for Records Management and PII (Personal Identifying Information) protections?	Document Response
6	Who has signature authority for 1) purchases over \$5,000? 2) Reimbursement Requests? 3) Check signature?	Document Response
7	Do you have grants that require matching funds? If yes, how is matching documented?	Document Response
8	(If there are past audit findings only) What is the progress of the past audit corrective action plan? Name Audit	

The interviews with the fiscal designee and other fiscal staff allow us to ascertain the level of familiarity with requirements.

Subrecipient Fiscal Compliance Review Form: On-Site Visit

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A	ccounting Practices and Procedu					
		Criteria/Guidance	Review Test/Question	Response	Notes	
		Accounting systems and processes must adhere to Generally Accepted	What accounting system is used?	Document Response	Interview	
		Accounting Principles (GAAP) and Uniform Guidance. Compliance	Has the accounting system changed within the past 4 years?	Yes No NA	Interview	
he relevant criteria equired by the Uniform		Supplement guidelines. System must be established to enable tracking of funds.Are staff trained on and have a current federal policies, proced instructions on accounting for a expending Federal funds?Development and consistentexpending Federal funds?		Review/Test		
iuidance, HRSA M tandards, and/or		implementation of policies and procedures that establish uniform administrative requirements governing the monitoring of awards.	How are the award funds identified and tracked in the accounting system? Are there controls in place to preclude	Questic		
iscal P&Ps are list	ed.	Interview Sr. Fiscal staff regarding general accounting process	 Over-obligation Under/overstatement of obligations Duplicate payments 	Yes Yes Yes Yes No NA	6 Policies	
Items to be re	eviewed.	 Review of the following: Fiscal policies and procedures; Fiscal monitoring reports; Cumulative Contract Expenditure Reports and backup; General Ledger/Transaction Detail; 	 Inappropriate charges Are accounting records supported by source documentation? (as needed) Canceled checks Payroll Invoices 	Yes No NA Yes No NA Yes No NA Yes No NA Yes No NA	Base responses on back u with CCER and sample invoices.	
		 Chart of Accounts; Sample Invoices and backup; Are expenditures for each line item 	Is staff knowledgeable of the requirements for determining activities and costs allowed and unallowed?	🗖 Yes 🗖 No 🎦 NA	Interview and verify in transaction detail overvie that all costs are allowable	
		reasonable and show progress to expenditure of total annual allocation?	Is there adequate segregation of duties for:	∎Yes ⊒No ⊒NA ∎Yes ⊒No ⊒NA	[Q: Who approves, posts, and reviews transactions? This should never be one person.]	

Subrecipient Monitoring Report: Post-Site Visit



- Visits end with an Exit Interview where the monitoring teams get an opportunity to discuss the strengths and any areas of non-compliance.
- A formal written on the site findings report signed by DHE and GAD provided to the subrecipient within one month of the completion of the site visit.
 Subrecipients have 20 business days in which to respond in writing to findings unless another timeline is given as part of the site visit report.
 - For each category the standard is stated as well as a summary of what was found and whether the standard was met
 - Performance Highlights and Successes
 - Opportunities for Improvement

Subrecipient Monitoring Report: Post-Site Visit



Accounting Practices and Procedures

- **Standard**: Subrecipient fiscal processes must be in compliance with all Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (45 CFR 75). Requirements include: standards for Financial and Program Management; including standards for financial (grants) management systems; payment; program income; revision of budget and program plans; property standards, including insurance coverage; equipment, supplies, and other expendable property. HAB Policy Clarification Notice 15-03 -HHS Grants Policy Statement-45 CFR 75.307
- **Condition**: The subrecipient's accounting system appropriately identifies and tracks RWPA transactions. Expenditure and revenue transactions are clearly identified and segregated in the general ledger. The program works in partnership with RWPA Program Officers to identify and request needed budget revisions and expend based on approved budgets. <u>Standard Met</u>

AWARD CLOSE-OUT



04

- Single Audit
- FFR/UOB
- Conditions of Award

Award Close-Out



DHE:

- Reconcile DHE budgets with Finance
- RWHAP Part A & MAI Expenditures Report
- UOB and Carry-over

GAD:

- Close-Out Memo Packet
- FFR
- Review and sign-off of the 10% Aggregate Certification for Subrecipients
- Submitting final drawdown in PMS

DHE & GAD:

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• Single Audit





Fulton County Government - Single Audit 93.914 – HIV Emergency Relief (Ryan White)

General:

- Internal Controls 1.
- Policy & Procedures Manual, if updated since 2016

Activities Allowed/Allowable Costs:

- 3. List of expenditures related to HIV Ryan White during 2019 – Finance
- Listing of employees charged to the Ryan White Program 4. in 2019

Cash Management:

5. Access to Drawdowns executed in 2019 along with supporting documentation – GAD

Eligibility:

6. List of agencies used during 2019 (include number of clients serviced at each agency)

Matching, Level of Effort, Earmarking:

- Program Progress Report and Approval Confirmation from 7. HRSA
- FY2019 Earmarking Data Sheet EMA Maintenance of Effort Report 8.
- 9

- Period of Availability of Federal Funds:
 10. Grant Agreement(s) covering 2019 GAD
 11. List of new grants issued during the FY2019 period GAD

Procurement and Suspension and Debarment:12. List of vendors paid \$25,000 or more during 2019

Reporting:

- Annual Program Progress Report (with component 2018 13. reports)
- Part A and MAI Final Expenditure Table SF-425, Federal Financial Reports GAD 14.
- 15.
- Rvan White Services Data Reports 16.

Subrecipient Monitoring:

List of agencies used during 2019 Updated Monitoring 17. guide, if any

CONCLUSION



05

- Website
- Contact Info
- Q&A



www.ryanwhiteatl.org





Select Language V Call us 404-612-8285 Send email rwhiteprogram@fultoncountyga.gov RYAN WHITE Part A Program HOME ABOUT US AM I ELIGIBLE? SERVICES REPORTS CALENDAR MEDIA CONTACT

"The Ryan White Program put life back in me."

Contact Information



- Angela Ash, Grants Administrator Grants Administration Division Finance Department Fulton County Government 404-612-7384 angela.ash@fultoncountyga.gov
- Jeff Cheek, Director
 Department for HIV Elimination
 Fulton County Government
 404-612-0789
 jeff.cheek@fultoncountyga.gov

 Bridget Harris, Deputy Director Department for HIV Elimination Fulton County Government 404-612-8204 bridget.harris@fultoncountyga.gov



Questions

