

#### FEDERAL GRANTS MANAGEMENT "Understanding & Managing Your HRSA Grant"

Presented by
Brian Feldman and Shonda Gosnell
Grants Management Specialists
HRSA Division of Grants Management Operations
Office of Federal Assistance Management



#### Overview

- Roles and Responsibilities in Managing Your Federal Grant
- Notice of Grant Award
- Accessing Your Grant Fund
- Post Award Procedures
- Reporting Requirements
- Grant Related Laws, Regulations and Policies
- Financial Management System Expectations
- HHS Administrative Regulations and Requirements
- Grant Closeout
- Resources
- Question and Answers





- When an award is made, a Project Officer (PO) and Grants Management Specialist (GMS) will be assigned to oversee the implementation of your project
- The PO complements the business management knowledge of the GMS with expertise in scientific, technical, or programmatic areas
- These key stakeholders are available to provide assistance in navigating unfamiliar territory as you implement your project

Grant Recipient

Grants Management

Specialist

**Project Officer** 



#### **Project Officer**

- Responsible for providing defining programmatic objectives and oversight responsibility for program performance
- Provide requested input on the disposition of prior approval requests to the GMS
- Refer questionable situations to the GMS for resolution
- Refer any incoming written prior approval requests to the GMS



#### Grantee

- Implement work plans to ensure that the project's goals and objectives are achieved in an efficient and timely manner
- Submit completed required performance and financial reports on time as required in your Notice of Grant Award (NGA) "Terms and Conditions"
- Ensure that key project staff members attend and participate in HRSA sponsored workshops and meetings
- Work collaboratively with your assigned grants management officer and program officer



#### Grants Management Specialist/Officer

- Provides clarification on grants regulations and financial aspects of the project
- Reviews and make recommendations on continued Federal support
- Monitors compliance with grant requirements and cost policies
- Monitors receipt of all required reports and follow-up as necessary to obtain delinquent reports
- Issues Notice of Grant Awards

NOTE: ONLY the HRSA Grants Office has legal authority and the final say in changing, approving or denying program expenditures.



# READ AND UNDERSTAND YOUR NOTICE OF GRANT AWARD (NGA) DOCUMENTS



#### **CONTENTS**

- Award Document
- Attachment Pages
  - Program-Specific Conditions
  - Program Terms
  - Standard Terms
  - Reporting Requirements
  - Contacts

[A]

1. DATE ISSUED: 12/04/2009	2. PROGRAM CF	DA: 93.918
3. SUPERCEDES AW	ARD NOTICE dated	f: n effect unless apecifically rescinded.
4a. AWARD NO.: 5 H76HAO. :-07-00	4b. GRANT NO.: H76HA0	5. FORMER GRANT NO.:
6. PROJECT PERIOD FROM: 01/01/2004		011

FROM: 01/01/2010 THROUGH: 12/31/2010

DEPARTMENT OF HEALTH AND HUMAN SERVICES HEALTH RESOURCES AND SERVICES ADMINISTRATION



AUTHORIZATION (Legislation/Regulation) FY 2007 Part C of Title XXVI of the PHS Act, 42 U.S.C. section 300-ff-51 et seq. (as amended).

8. TITLE OF PROJECT (OR PROGRAM): Ryan White Part C Outpatient Eli	25 Programs

9. GRANTEE NAME AND ADDRESS:	10. DIRECTOR: (PROGRAM DIRECTOR/PRINCIPAL INVESTIGATOR)  12. AWARD COMPUTATION FOR FINANCIAL ASSISTANCE					
11. APPROVED BUDGET: (Excludes Direct Assis						
[X] Grant Funds Only	a. Authorized Financial Assistance This Period \$ 639,66					
[] Total project costs including grant funds and al	b. Less Unobligated Balance from Prior Budget Periods					
participation	i. Additional Authority \$ 0					
	ii. Offset					
a. Salaries and Wages:			c. Unawarded Balance of Current Year's Funds			
b. Fringe Benefits:	\$ 94,675.00	Period  e. AMOUNT OF FINANCIAL ASSISTANCE THIS  \$ 639,663.0				
c. Total Personnel Costs:	\$ 458,811.00					
d. Consultant Costs:	\$ 0.00					
e. Equipment:	\$ 0.00	ACTION				
f. Supplies:	\$ 13,670.00		D FUTURE SUPPORT: (Subject to t	he availability of		
g. Travel:	\$6,491.00		ry progress of project)			
h. Construction/Alteration and Renovation:	\$ 0.00	YEAR	TOTAL COSTS			
i. Other:	\$ 52,928.00	08	\$ 639,663.00			
j. Consortium/Contractual Costs:	\$ 107,763.00	14 APPROVED DIE	RECT ASSISTANCE BUDGET: (In lie	ou of cash)		
k. Trainee Related Expenses:	\$ 0.00	a. Amount of Direct	\$ 0.00			
I. Trainee Stipends:	\$ 0.00	b. Less Unawarded Balance of Current Year's		\$ 0.00		
m. Trainee Tuition and Fees:	\$ 0.00	Funds		5 0.00		
n. Trainee Travet:	\$ 0.00	c. Less Cumulative Prior Awards(s) This Budget		\$ 0.00		
o. TOTAL DIRECT COSTS:	\$ 639,663.00	Period				
p. INDIRECT COSTS: (Rate: % of S&W/TADC)	\$ 0.00	d. AMOUNT OF DIRECT ASSISTANCE THIS				
q. TOTAL APPROVED BUDGET:	\$ 639,663.00	ACTION				
i. Less Non-Federal Resources:	\$ 0.00					
ii. Federal Share:	\$ 639,663.00					

#### 15. PROGRAM INCOME SUBJECT TO 45 CFR Part 74.24 OR 45 CFR 92.25 SHALL BE USED IN ACCORD WITH ONE OF THE FOLLOWING ALTERNATIVES:

A=Addition B=Deduction C=Cost Sharing or Matching D=Other

Estimated Program Income: \$ 0.00

7. BUDGET PERIOD:

16. THIS AWARD IS BASED ON AN APPLICATION SUBMITTED TO, AND AS APPROVED BY HRSA, IS ON THE ABOVE TITLED PROJECT AND IS SUBJECT TO THE TERMS AND CONDITIONS INCORPORATED EITHER DIRECTLY OR BY REFERENCE IN THE FOLLOWING:

a. The grant program legislation doed above. Is. The grant program requisition dised above. Is. The grant program requisition of the grant program is conflicting or otherwise indicated process applicable to the grant, the above order of precedence shell prevent. Acceptance of the grant terms and conditions is acknowledged by the grantee when funds are drawn or otherwise obtained from the grant payment system.

#### REMARKS: (Other Terms and Conditions Attached [X] Yes [ ] No )

Electronically signed by Helen Harpold, Grants Management Officer on: 12/04/2009

17. OBJ. CLASS: 41.51   18. CRS-EIN:			:A1	19. FUTURE REC	DMMENDED FUNDING:			
FY-CAN	CFDA	DOCUMENT N	10.	AMT. FIN. ASST.	AMT. DIR. ASST.	SUBPROGRAM	SUB ACCOUNT CODE	
10-3770891	93.918	H761	во	\$ 639,663.00	\$ 0.00	N/A	N/A	



# Notice of Grant Award IMPORTANT ITEMS

- Items 6 & 7: Period of Federal Support
  - Budget and project period: typically 12 months and 3 5 years, respectively (but Federal obligation to renew funds is generally limited to budget period authorization).
- Items 11-19: Federal funds awarded
  - Approved budget; budget period funding; offset; carryover (additional authority); future support (conditional); matching/cost sharing
     requirements
- Document No.:
  - Number you use to report obligations & expenditures against the grant to the Payment Management System.



#### **Attachment Pages**

#### Program conditions

- Always require a response by a specific date failure to respond to the HRSA Division of Grants Management Operations in a satisfactory manner may result in an adverse action
- If the program condition includes additional requirements, HRSA will remove such requirements once the conditions corrected

#### Program Terms

 generally informational and advisory by nature (e.g., uses and limitations of funds and post award administration), but may require a response to HRSA



#### **Attachment Pages**

- Standard Terms
  - appear on the initial award for the budget/project period and describe general terms and conditions of the grant
- Reporting Requirements
  - Identifies the various reporting requirements and due dates of the grant
- Contacts
  - Identifies the Federal contacts for assistance



# ACCESSING YOUR GRANT FUNDS



### **Accessing Federal Funds**

Payments for grants award by HRSA are made through the Division of Payment Management

Division of Payment Management

P. O. Box 6021

Rockville, MD 20852

(877) 614-5533

http://www.dpm.psc.gov



# Accessing Federal Funds Important Reminders

- You should minimize the time of your draw-down and consider what is administratively feasible for your organization. Manage your Account!!
- The Draw-downs can either be advances or reimbursement, based on organization-specific processes.
- Federal funds should be placed in an interest bearing account. The first \$250 of interest earned may retained.
- Submit required reports in a timely manner.



#### **Accessing Federal Funds**

- SF-425 Federal cash transactions report
  - Monitors the timing of cash advances and disbursements
  - Submitted quarterly, 30 days after the end of the corresponding quarter
- SF-270 Request for Advance or Reimbursement
  - Used when a condition restricting cash draws has been imposed and funds are released only with approval of DGMO
  - Copy signed by authorizing official must be submitted to GMS through EHB Prior Approval module
  - DGMO approves and submits to PMS
  - Process takes a minimum of 3-5 days grantees encouraged to submit request 14 days prior to funds being needed



#### **POST AWARD PROCEDURES**



- Any changes in the scope or budget that may significantly impact the project or materially impair the ability to meet objectives may need prior approval from HRSA.
- Most common actions requiring HRSA prior approval:
  - Change in project director/other key personnel
  - Budget Revisions (> 25% of budget)



- Carryover of unobligated funds into the subsequent funding period
  - Carryover request
    - should be submitted at the same time as the SF-425 Federal Financial Report (FFR) and must include a line item budget, budget narrative and justification
    - should include details as to how the carryover will be used to complete the goals and objectives of the program
    - should not be presented for the reason of spending down of awarded funds
  - Carryover is not always guaranteed



- No-Cost Extensions A request to extend the final project period up to one year beyond the original expiration date shown on the NGA to complete the goals and objectives of the project.
  - No additional funds are required to be obligated by the awarding agency, there will be no change to the project scope or objectives and any one of the following applies:
    - Additional time beyond the established expiration date is required
    - Continuity of Federal grant support is required while a competing continuation application is under review
    - The extension is necessary to complete the original approved aims of the project.
  - Must be submitted no less than 30 working days prior to the end of the project period



- Change in scope
- Inclusion of costs that require prior approval
- Contracting for substantive programmatic work
- Absence of project director for more than 3 months or a 25% reduction in time devoted
- Need for additional Federal funds
- Change of grantee organization
- Pre-award costs



- Prior approval requests must be submitted through the EHB Prior Approval module
  - After review by the program officer and grants
    management specialist, approval is official when a Notice
    of Grant Award is issued reflecting the approved request



### REPORTING REQUIREMENTS



#### **Reporting Requirements**

- SF-425 Federal Financial Report (FFR)
  - Submitted annually within 90 days after the budget period ends
  - Reported each budget period but a cumulative report
  - FFR submission only electronically through EHB
  - Report submitted by financial official or other designee determined by grantee

Note: Part B grantees must submit an interim FFR within 150 days of the budget period start date. This FFR must show at least a 75% obligation of the funds! No exceptions!

10.Transactions	ons (Hide					(Hide (	etangyiously Reported	This Period	Cumulative
(Use lines a-c for single or	multiple gra	ant report	ing)						
Federal Cash (To report	multiple g	rants, als	o use FFR Attachr	ment:					
a. Cash Receipts									\$0.00
b. Cash Disbursements									\$0.00
c. Cash on Hand(line a r	ninus b)								\$0.00
(Use lines d-o for single gra	ant reportin	g)							
Federal Expenditure and	Unobligat	ted Balan	ce						
d. Total Federal Funds A	uthorized								\$3,184,486.00
e. Federal Share of Expenditures						\$2,078,175.00	\$ 1,106,311.00	\$3,184,486.00	
f. Federal Share of Unliq	uidated Ob	ligations	,						\$0.00
g.Total Federal Share(su	m of lines	e and f)							\$3,184,486.00
h. Unobligated balance of	of Federal F	unds(line	d minus g)						\$0.00
Recipient Share									
i. Total recipient share required						\$0.00	\$ 0.00	\$0.00	
j. Recipient share of expenditure					\$0.00	\$ 0.00	\$0.00		
k. Remaining recipient s	hare to be	provided(l	ine i minus j)						\$0.00
Program Income									
Total Federal Program Income earned							\$5,939,762.00		
m. Program income expended in accordance with the deduction alternative								\$0.00	
n. Program income expended in accordance with the addition alternative							\$5,939,762.00		
o. Unexpended program	income(lin	e I minus	line m or line n)						\$0.00
1. Indicat Everyone	a.Type	b.Rate	c.Period From	Period To	d.Base	e.Amoun	t Charged f.Federal Sha		re
11.Indirect Expense	N/A	N/A	N/A	N/A	\$0.00	\$0.00	0 \$0.00		
g.Totals   0.00   0.00						0.00			



#### **Reporting Requirements**

- Annual Audit (OMB Circular A-133)
  - Required for all Federal expenditures greater than \$500,000, as well as the compliance supplement for health centers
  - Due 9 months after the end of the fiscal year or 30 days after receipt from the auditor, whichever is earlier
  - Preferably, the audit will result in an unqualified opinion, gross charges exceed billable expenses, acceptable financial ratios, and minimal (or no) material audit findings



### **Grant-Related Laws, Regulations**and Policies

- Grant enabling statute:
- Program specific regulations:
- DHHS administrative regulations: 45 C.F.R. Part 92 or 45 C.F.R. Part 74, incorporating OMB Circulars A-110 and A-122
- OMB Circular A-133 Federal Audit Guidance
- HRSA Program Policies:
- NGA and special terms and conditions



### FINANCIAL MANAGEMENT SYSTEM EXPECTATIONS



### Financial Management System Expectations

45 CFR Part 74: Requirements

- Financial management system elements
  - General ledger
  - Accounts receivable system
  - Accounts payable system
  - Property and Equipment Management system
  - Reporting system
  - Internal Control system with policies and procedures
  - Cash collections and control
  - Schedule of fees and discounts



### Financial Management System Expectations

- Capable of generating monthly financial statements:
  - Budget comparative: monthly and yearly
  - Include ratio and productivity analyses
  - Cost center responsibility center





- HHS Grants Policy Statement
- 45 CFR Part 74
  - Nonprofit Federal grantees (including health centers) are subject to administrative requirements in the above, incorporating –
    - OMB Circular A-110 Administrative standards
    - OMB Circular A-122 Cost principles



- Financial/Program Management
  - Federal Cost Principles: Allowability and allocability
    - Federal cost principles (and procurement standards) apply to expenditures of program income and non-grant funds
    - Specific problem areas include lobbying, fundraising, reserves, travel and entertainment
  - Federal Cost Principles Indirect Costs
    - Grantees with multiple sources of funding consider
    - Justify cost allocation of "overhead" to the various sources
    - Approved percentage of "overhead" to each source of funding
    - Requires applicable rate to be negotiated



#### Procurement Standards

- Written standards of conduct for employees, officers and agents (including conflict of interest)
- Open and free competition
- Written procurement procedures
- Maintenance of procurement records, including cost and price analysis and justification for contractor and award selection (available to DHHS upon request)
- Contract administration system that ensures contractor compliance
- Specific contract provisions required in all Federal funded contracts
- Additional provisions for contracts for more than \$100,000



- Property and Equipment Standards
  - Federal government retains a reversionary interest in all property/equipment acquired or improved with Federal funds
    - Title vests in the grantee, subject to the grantee's continued use for authorized purpose
    - The grantee should obtain insurance for the equipment or property
  - Use and disposition
    - Must continue to use for Federally-sponsored project as long as it is needed



- Use and disposition (continued)
  - Must obtain disposition instructions from HRSA if the grantee no longer needs real property/equipment
  - Must continue to use for Federally-sponsored project as long as it is needed
  - Must obtain disposition instructions from HRSA if the grantee no longer needs real property/equipment
  - To retain title or sell real property/equipment, grantee must compensate government for "Federal share"
  - If equipment is no longer needed for original Federallyfunded purposes, may be used for other Federally-funded project without HRSA approval



- Record-keeping and Reporting Requirements
  - Grantees are responsible for monitoring and oversight of all activities supported by Federal funds
  - Must submit to DHHS <u>financial and programmatic reports</u> pertaining to the grant-supported project as prescribed by DHHS
  - Retention Period
    - 3 years for all records pertaining to grant-supported project
    - For audits or litigation, records should be maintained until the later of end of the appropriate retention period or until the audit litigation, or other action is completed



DHHS, the Comptroller General, or any of their duly authorized representatives has the right to

- Timely and unrestricted access to records, reports, books, documents, and papers pertaining to the grant-supported project
- Timely and reasonable access to the grantee's personnel for the purpose of interview and discussion



### **Grant Closeout**



#### **Grant Closeout**

- Prior to the project period end of a grant information is sent to grantees detailing the specifics of the Closeout Process.
- Required Submissions
  - Final Federal Financial Report (FFR), SF-425
    - Cannot contain unliquidated obligations
    - Final amount of expenditures reported to the Division of Payment Management on the quarterly Federal Cash Transaction Reports (SF-425) must agree with the cumulative level of expenditures reflected on the FFR for that Project Period.
    - For Part B grantees, the actual expenditures listed within the Payment Management System must also agree before closeout can be completed.
  - Inventory of equipment acquired with Federal funds with a current value of at least \$5,000
    - Include request for retention or disposition
    - If transfer or sale requested, include current fair market value
  - Final program performance report
  - Closeout does not affect the government's right to conduct an audit and recover amounts based on an audit.



#### **Helpful Websites**

#### **HHS and Standard Forms:**

http://www.hhs.gov/forms/publicuse.html

#### **Other Helpful Links:**

**HHS Grants Policy Statement:** 

http://www.hhs.gov/grantsnet/adminis/gpd/index.htm

**Code of Federal Regulations (CFR):** 

http://www.gpoaccess.gov/cfr/index.html

**OMB Circulars:** 

http://www.whitehouse.gov/omb/circulars



# GRANTS MANAGEMENT CONTACTS HRSA, Division of Grants Management Operations

Brian Feldman

Grants Management Specialist

Bfeldman@hrsa.gov

301-443-3190

Shonda Gosnell
Grants Management Specialist
SGosnell@hrsa.gov
301-443-4238