GRANT MANAGEMENT 101

Department of Grants Administration

Advisory

Note that this Grant Management 101 slide presentation and corresponding guidance documents are *internal* to Sullivan County and may not be shared with outside entities without permission. Individuals representing entities outside of Sullivan County Government may contact the Department of Grants Administration, who can refer them to appropriate grant-management resources.

Department of Grants Administration
Our Role & Responsibilities

- **Facilitate access to external discretionary funding for divisions, departments, agencies and other units of the Sullivan County government**
- **Improve the administration of existing funding/grant resources**

In other words…we help bring the money in, but we also serve as one of the County's several internal controls for proper fiscal management.

We…

- *Engage in research & make recommendations*
- *Provide technical assistance*
- *Maintain files on every grant program we track*
- *Carry out high-level monitoring*

A REVIEW OF...

THE GRANT CYCLE

Pre-Award Phase	**Award Phase**	**Post-Award Phase**
• "What's the problem?" • "What are the needs?" • Plan Project • Locate Funding Opportunity • Complete Application	• Award or Declination • Contract/Award Agreement	• Project & Grant Management • Implement Workplan/Project • Reporting • Claiming/Draw Down • Close-Out

What are some grant management challenges you have faced?

WHAT IS "GRANT MANAGEMENT?"

A technical definition:

Achieving ongoing compliance with all requirements using an approach that has strong internal controls.

BLAH BLAH!! BLAH

What does that mean in plain language?

ONCE YOUR GRANT IS AWARDED...

The focus shifts to:

- **Getting the project done.**
- **Managing risks throughout the project.**

What Grant Management involves:

- Following procurement protocols.

- Doing what you *said* you were going to do on application.

- Spending the money in the way in which you *proposed*. *

- Spending the money in the way that it is *allowable*. **

- Keeping meticulous bookkeeping for reporting.

- Having systems in place for program data reporting.

- Tracking funding and program outcomes/data. This may include time and effort.

- Staying in touch with your funding agency.

The County can't "switch things up" midstream without first obtaining permission and instructions from the funding agency.

**Be mindful of Uniform Guidance (Federal) and State and other grant-related guidelines.*

Why should good Grant Management be a priority?

Grant contracts and award agreements are *binding*!

- **Failure to hold up to our side of the agreement can result in:**
- Funding being clawed back.
- Inability to receive funding in the future.
- Legal action (liquidated, treble damages, law suits).

Therefore...

Any staff involved in:

- **Implementing the workplan**
- **Submitting reports**
- **Submitting claims**

Awards for Whistleblowers: Qui Tam Provision
If a qui tam lawsuit is successful in recovering funds lost due to fraud, the whistleblower can receive a portion of the recovered amount, typically ranging from 15% to 30%. This incentivizes people with knowledge of fraud to come forward.

...should be *very familiar* with the grant's program guidelines and fully executed contract/award agreement.

MANAGING RISKS
PREVENTING WASTE, FRAUD, AND ABUSE

Grant Fraud

The use of grant funding for a purpose other than intended.

- *Charging for costs which have not been incurred or are not attributable to a grant*

- *Failure to maintain accurate time and effort documentation*

- *Securing unjustified sole source procurement*

- *Charging personal expenses as business expenses against a grant*

- *Charging for inflated labor costs or hours against a grant*

- *Allowing conflicts of interest **

* A conflict of interest in the context of grants arises when an individual or organization involved in the grant process (e.g., recipient, subrecipient, reviewer) has personal, professional, or financial interests that could potentially compromise or bias their judgment and objectivity related to the grant.

Grant Waste

Failure to receive a grant's full value due to poor planning & lack of controls leading to wasted resources.

- *Poor financial or administrative management of grants*
- *Improper grant payments*
- *Buying overpriced office equipment from a favored vendor*
- *Buying unnecessary equipment for personal use or gain*
- *Lack of controls in the payment process*

Grant Abuse

Behaving improperly, unreasonably, or misusing one's position or authority.

- *Writing technical specification or contract terms to favor a specific contractor*
- *Utilizing County resources (staff, time, equipment, supplies) to apply for "pet project" grants as a favor to entities outside the County and/or not in alignment with a department's service area or the County's mission or strategic plan*

Examples of Grant Mismanagement

- *Not obtaining authorizing resolutions as required*

- *Failure to obtain cost estimates properly or to follow procurement guidelines*

- *Failure to provide confirmation that additional funding sources are secured (large projects)*

- *Loose/inaccurate records/receipts for time and effort/expenditures*

- *Making purchases against a grant/allocation prior to the contract/award agreement being fully executed*

- *Failure to complete workplans, adhere to grant requirements, or complete reporting accurately and on time*

- *Unresponsiveness to funding agency requests for information and/or project updates or modifications*

- *Failure to reassign project to qualified personnel if project manager leaves his/her position*

5 Ways to manage risk during a grant project:

1. Review Financial Controls

2. Evaluate Readiness

3. Assess Compliance Framework

4. Monitor Subrecipient/Contractor Risks

5. Document and Communicate

From "Checklist for Comprehensive Risk Management," MyFedTrainer.com

1

Review Financial Controls

Make sure all financial procedures are current and effective.

- Confer with your Division/Department OMB/fiscal staff to go over the grant's budget and fiscal and reporting requirements.
- If the funding agency offers any webinars or info conferences...*attend!* Include the members of your internal team.
- Purchasing will need to know what the procurement requirements are. (Don't wait until the last minute!)
- Make sure project managers understand what expenditures are *allowable*.
- Confirm what fiscal documentation is required for claims/reporting and set up a system to maintain the records.
- Make sure all contracts/award agreements are fully executed and route copies to Audit and Purchasing prior to incurring expenses.
- Find out from OMB staff if a Project Account Code is needed.
- Copy the Treasurer's Office on all submitted claims.

2

Evaluate Operational Readiness

Confirm your team and resources are aligned
to meet your project's objectives.

- Review your organizational structure and assess for any capacity issues.
- Make sure staff is assigned to manage the implementation of the workplan, data collection, fiscal management, and reporting.
- Ensure that staff is properly trained related to grants best practices, the grant program guidelines, and any software platforms utilized for management/reporting purposes.
- Establish open lines of communication between County stakeholders (ex. Purchasing, Audit, Grants Department, County Attorney) and external stakeholders (funding agency program reps.)
- Prepare for any related impacts to the County budget. Check reimbursement schedules, and make sure any and all necessary authorizing resolutions are enacted.

3

Assess Compliance Framework

Ensure you're adhering to all regulatory and grant-specific requirements.

- Make sure members of your grant project team are familiar with the program guidelines and contract/award agreement requirements.
- Be cognizant of procurement requirements. For example, New York State has MWBE and SDVOB requirements which must be adhered to for State grants.
- Constantly monitor your program's timeline and progress, assess risks, and communicate concerns with the funding agency rep.
- Pay close attention to contract amendments and make sure the originating resolution still stands.
- Confer with the Department of Grants Administration and respond to requests for information.

(4)

Monitor Subrecipient Risks

Verify that your subrecipients/subcontractors are compliant with grant requirements.

- Subrecipients and/or subcontractors are typically subject to a grant's regulatory guidelines.
- This typically includes procurement and corporate compliance regulations.
- Ensure that the subrecipient/subcontractor obtain copies of program and regulatory guidelines and acknowledge receipt and intention to comply.
- This is typically done via an MOU or contract. Confer with County Attorney about what will be necessary.
- Ensure that subrecipient/subcontractor understand what documentation will be required for fiscal and program monitoring.
- Monitor subrecipient/subcontractor activity.
- Keep lines of communication open.

What's the difference between a subrecipient and subcontractor?

Simple 4-question test From MyFed Trainer:

· Do they carry out a program objective of the federal award?
o T*hat's likely a subrecipient.*

· Do they provide goods or services to support your organization's work?
o *That's more like a contractor.*

· Do they help determine eligibility, performance, or program outcomes?
o *That points to a subrecipient relationship.*

· Do they operate in a competitive environment, offering similar services to others?
o *That usually describes a contractor.*

⚠️ **Caution - Look at the full scope & confer with County Attorney to make a determination.**
For additional guidance, read "What's in a Name? 5 Tips to Spot Subrecipients"
**by Rachel Werner, MPA, GPC, PMP, MyFedTrainer**

5

Document and Communicate

Keep detailed records and
maintain open communication with all stakeholders.

- Keep all grant-related records tightly organized, labeled, and in file folders where items are easy to locate.
- Keep a paper trail of critical communications with program reps and stakeholders.
- Maintain copies of cost estimates, invoices, receipts of payment, disbursements, time and effort records, and related correspondence.
- We highly recommend using a file organization structure recommended by OMB staff. See Grants Best Practices Guide p. 15

QUICK TIPS
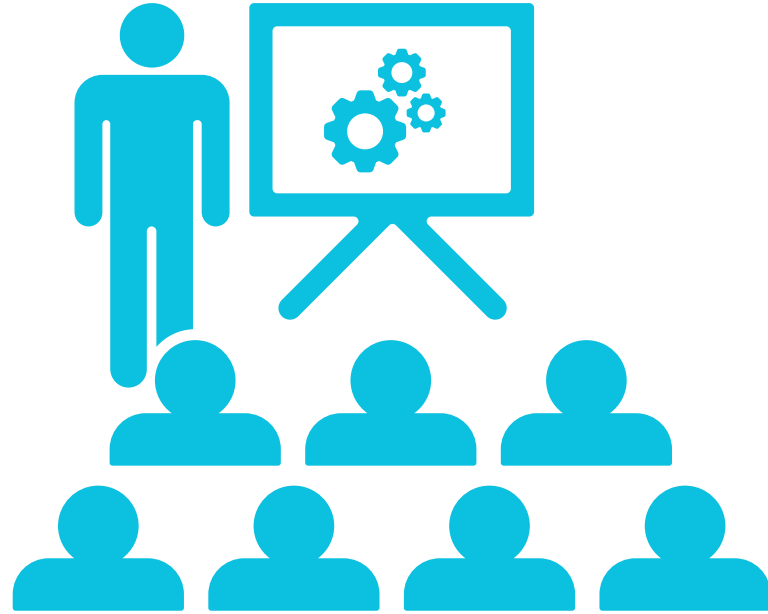
1) Develop a thorough grant management plan

- *Segregation of duties*

- *Financial tracking*

- *Compliance*

- *Reporting*

- *Time and Effort*

- *Maintain tight files*

KEEPING THOSE FILES IN CHECK

It may seem obvious, but when schedules become overwhelmed, having a tried and true organizational system saves time and effort in the long run. Here are some practical "pro tips" shared by Departments who have successfully managed to wrangle the complexities of grant management.

LABELING YOUR GRANT FILE

Labeling the grant file will help you maintain organization, access information easily, and assist others in locating information in your absence.

Your format should include:
- Funding Year (based on NOFA)
- Grant Title and Granting Agency/Organization
- Project/Program Title

Examples:
2019 NFWF Highland River Access
2023 GTSC Child Passenger Seat Safety Program
2023 OPRHP Snowmobile Grant-in-Aid Program

WHAT TO KEEP IN THE GRANT FILE
- Copy of fully executed GCAF
- Copy of Official Authorizing Resolution(s)
- NOFA and Funding Agency Guidelines
- Submitted Application/Supporting Documents
- Fully Executed Memorandums of Understanding
- Official Notification of Award/Declination
- *Fully Executed* Award Agreement/Contract(s)
- Project Account Code Information
- *Fully Executed* Amended Award Agreements/Contracts
- Additional Resolution(s)
- Monitoring and Compliance Documents
- Claims/Disbursement Requests

SAMPLE DIGITAL GRANT FOLDER TEMPLATE

Name	Date modified	Type
Application	7/3/2023 10:42 AM	File folder
Award Notifications	7/3/2023 10:42 AM	File folder
Blank Forms	7/3/2023 10:39 AM	File folder
Closeout	7/3/2023 10:40 AM	File folder
Correspondence	7/3/2023 10:41 AM	File folder
Disbursement Requests	7/3/2023 10:40 AM	File folder
Environmental Review	7/3/2023 10:45 AM	File folder
Executed Contracts	7/3/2023 10:41 AM	File folder
GCAF and Resolutions	7/3/2023 10:42 AM	File folder
Monitoring and Compliance	7/3/2023 10:40 AM	File folder
NOFA	7/3/2023 10:40 AM	File folder
Program Guidelines	7/3/2023 10:41 AM	File folder
Reporting	7/3/2023 10:41 AM	File folder

Grants Best Practices Guide page 15
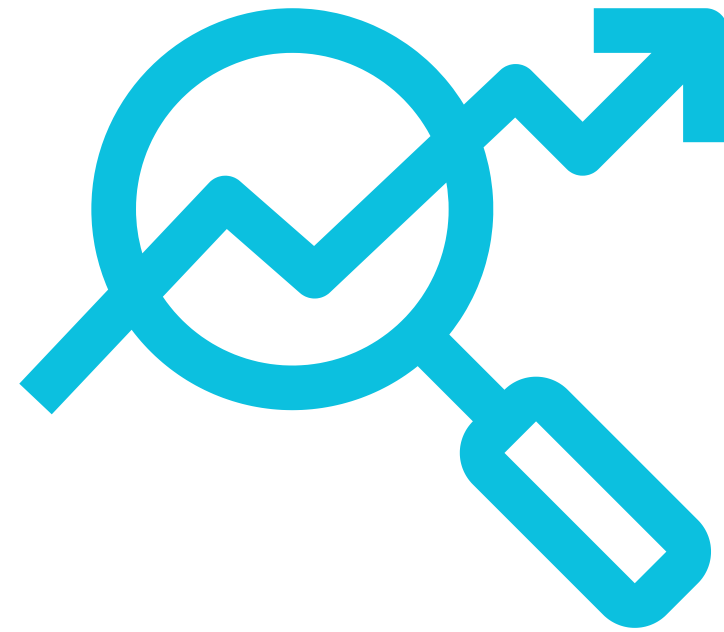
2) Establish monitoring framework

- *Establish internal deadlines for reporting*

- *Create tracking calendar*

- *Develop a tracking system (ex. Excel spreadsheet)*

3) Confer with stakeholders early and often

- *"First Stop" - Department of Grants Administration*

- *Budgetary Impacts - Division of Management and Budget/County Manager*

- *Procurement - Purchasing*

- *Claims - Management and Budget*

- *Attestations/Contracts - County Attorney*

4) Engage in frequent and transparent communications

- *Hold touchpoint meetings with your team/management*

- *Report on progress*

- *Assess risks*

- *Make sure stakeholders have copies of relevant documents (Audit & Purchasing, Grants Administration)*

Questions?

Contact:
Department of Grants Administration
845-807-0468

THANK YOU