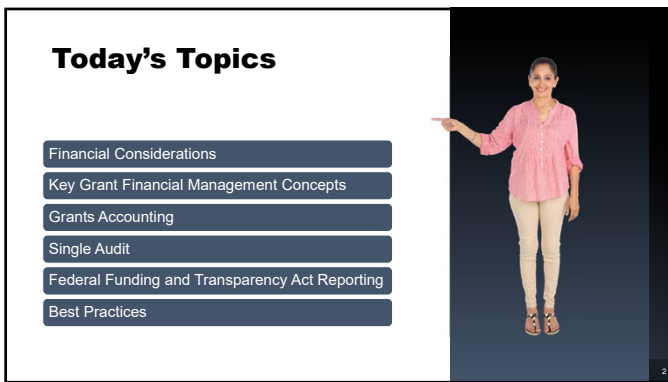




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6



Factors to Consider

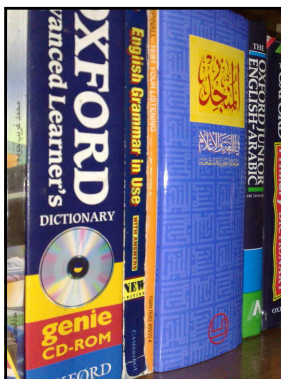
- Direct and Indirect Costs
- Capacity
- Reporting
- Match
- Cash Flow
- Sustainment

7



Key Grant Financial Management Concepts

8



Financial Terminology

- Budget period
- Financial obligation
- Period of performance
- Liquidation period
- Cost sharing or matching
- In-kind match
- Maintenance of effort
- Supplanting


9

Post Award Key Concepts

Be familiar with what **types of expenditures** are allowed.


Know the **budget period, period of performance, and liquidation period.**


Be aware if your grant has a **match or maintenance of effort** requirement.





10

Additional Key Concepts



 Documentation and record retention

 Interest and program income


 Transfers to other entities may create a subrecipient relationship

11

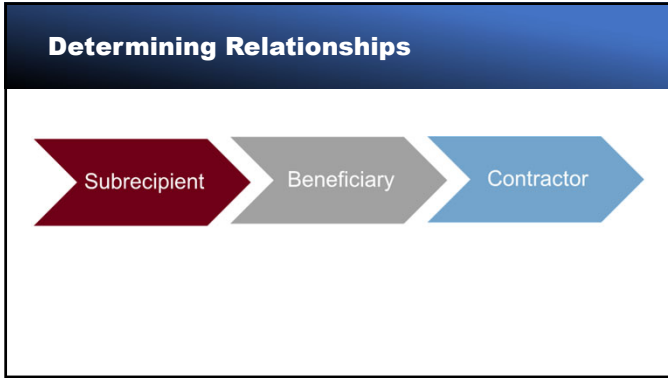
Program Income

Includes but is not limited to:

- income from fees for services
- use or rental of property acquired
- sale of commodities or items fabricated
- license fees and royalties
- principal and interest on loans



12



13

Determination Makes a Difference


Contractor
Goods or services are procured following a procurement method

Subrecipient
Pass-through responsibilities apply

Beneficiary
Requirements are limited



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Pass-through Responsibilities (2 CFR 200.332)

- Award notice
- Review audits and follow up on issues
- Evaluate subrecipient's risk of noncompliance
- Monitor the activities and use of funds

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**Allowability of Costs
(2 CFR 200.403)**

- Necessary and reasonable
- Allocable
- Conforming to limitations or exclusions
- Consistent with policies and procedures
- Costs are treated consistently
- Not included as a match or cost-share
- Adequately documented
- Incurred during the budget period




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Supplement versus Supplant

17



Cash Management

- Minimize time between receipt of federal funds and disbursement
- Requires written procedures

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Key Concepts to Remember

- DRAW FUNDS FOR IMMEDIATE NEEDS
- DISBURSE FUNDS TIMELY!
- PROCESS GRANT PAYMENTS VIA EFT

19

Personnel Costs

- Personnel costs directly charged should ensure appropriate documentation.
- Salaries of administrative and clerical staff normally are treated as indirect.
- Indirect costs must either have an approved rate or use the de minimis rate.



20



What is the cost to administer a grant program?

Direct Costs + Indirect Costs = Total Program Cost

21



22

Direct versus Indirect Cost

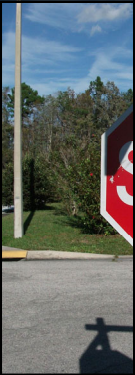
Direct Cost	Indirect Cost
Directly traced to program	Not directly traced or easily assigned
Cost because of program	Incurred for a common purpose

23

What can be included in an indirect rate?

- Human Resource Costs
- IT Costs
- Accounting Costs
- Purchasing Costs
- Management Costs
- Oversight Costs
- Building Costs

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What is NOT included in the rate?


- Executive Governance Costs
- Board Costs
- Executive Management

25

Indirect Cost Rate Options




Negotiate an indirect cost rate




Use de minimis rate of 10% modified total direct cost

26

Who approves my rate?



COGNIZANT AGENCY



PASS-THROUGH ENTITY (PTE)

27



28



29

Financial Management
2 CFR 200.302 (b)

- Identification
- Accurate, current, and complete
- Effective internal controls and accountability
- Budget versus Actual
- Written procedures for federal payment and allowability



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Single Audit

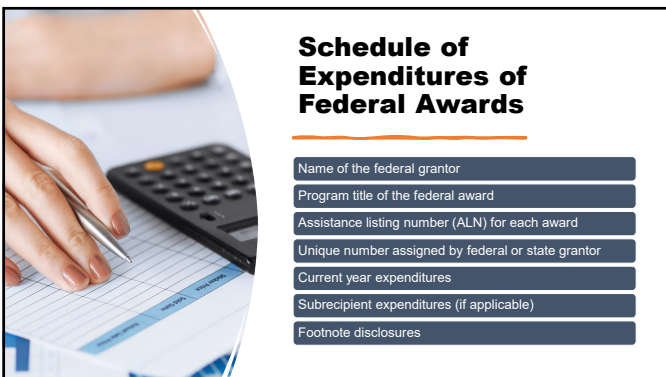
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Assistance Listings

- [SAM.gov | Assistance Listings](https://www.sam.gov)
- Provides descriptions of programs and requirements

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Schedule of Expenditures of Federal Awards


- Name of the federal grantor
- Program title of the federal award
- Assistance listing number (ALN) for each award
- Unique number assigned by federal or state grantor
- Current year expenditures
- Subrecipient expenditures (if applicable)
- Footnote disclosures

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OMB Compliance Supplement

Auditor Road Map

[2023 Compliance Supplement – 2 CFR Part 200 Appendix XI \(May 2023\) \(whitehouse.gov\)](#)



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Requirement	A	B	C	E	F	G	H	I	J	L	M	N
Program Number (00000 (no matrix))	Applicable, Planned or Unplanned	Allowable Cost/Out-Principles Management	Eligibility	Equipment Real Property Management	Matching Level of Effort, Management, and Reporting	Period of Performance	Program Management	Program Income	Reporting	Subrecipient Monitoring	Terms and Conditions	
10-500	Y	Y	N	N	N	Y	N	N	N	Y	Y	N
10-511	Y	Y	Y	N	Y	Y	N	N	N	Y	Y	N
10-512	Y	Y	Y	N	Y	Y	N	N	N	Y	Y	N
10-514	Y	Y	N	N	N	N	N	N	N	Y	Y	N
10-515	Y	Y	N	N	N	N	N	N	N	Y	Y	N
10-516	Y	Y	Y	N	Y	N	N	N	N	Y	Y	N
10-517	Y	Y	Y	N	Y	N	N	N	N	Y	Y	N
10-520	Y	Y	Y	N	Y	N	N	N	N	Y	Y	N
10-521	Y	Y	N	Y	Y	N	N	N	N	Y	Y	N
10-545	Y	N	N	Y	N	N	N	Y	N	Y	Y	N
10-551-10-561 (OSAP Cluster)	Y	Y	N	N	N	Y	N	Y	N	Y	Y	Y
10-553-10-555-10-546 (OSAP Cluster)	Y	Y	N	Y	N	N	N	Y	N	Y	Y	Y
10-559-10-582 (Child Nutrition Cluster)	Y	Y	N	Y	N	N	N	Y	N	Y	Y	Y

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Common Audit Issues



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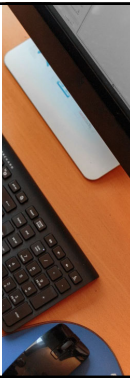


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What are the FFATA requirements?

2 CFR Chapter 1, Part 170

Report *sub-awards* greater than or equal to \$30,000 by the end of the following month



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What needs reported?

- Name of entity
- Award amount and date
- Funding agency and federal award identification number (FAIN)
- Assistance listing number
- Program source
- Description of the purpose of funding action
- Location of the entity
- Place of performance
- Unique entity identifier and its parent; and
- Executive compensation

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- 80% or more of annual gross revenues from the federal government and >\$25M

AND

- Compensation information is not available through reporting to the securities and exchange commission (SEC)

What is the criteria for reporting executive compensation?

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Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) at <https://www.fsr.gov/>

How do you report?

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Factors to Consider

- <http://www.zip-codes.com/> is used as the source of the Congressional District look-up table
- The unique entity identifier (UEI) must be active in the System for Award Management (SAM.gov)




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Challenges of FFATA




Obtaining the necessary information



Identifying who is responsible for reporting



Developing a trigger to report



System can be cumbersome

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- Be prepared!
- Understand the strings
- Be a part of the program!
- Consider reporting and close-out from the beginning
- Consider technology options
- Don't wait to reconcile and monitor use of funds

Tips for Success

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Final Thoughts

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Grant Related Resources

Code of Federal Regulations (Uniform Guidance)

https://ecfr.io/Title-02/cfr200_main

System for Award Management

<https://sam.gov/SAM/>

Federal Acquisition Regulations

<https://www.acquisition.gov/browse/index/far>

Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

<https://www.fsrs.gov/>

USASpending.gov

<https://www.usaspending.gov/#/>

Pandemic Response Accountability Committee

<https://pandemic.oversight.gov/>

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Other Helpful Resources

Grants.gov

[Home | GRANTS.GOV](#)

Ohio Department of Transportation

<https://www.transportation.ohio.gov/programs/local-funding-opportunities#page=1>

U.S. Dept of Transportation – DOT Navigator

<https://www.transportation.gov/dot-navigator?adlt=strict>

BIL Launchpad

<https://billlaunchpad.com/>

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