Crafting Effective Grants Policies and Procedures

2024 Hub Summit

April 24, 2024

Introductions

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Agenda

✓ What is Grants Policy?

✓ Why is it Important?

✓ How to Implement Policies and Procedures

✓ Key Resources

What is Grants Policy?

- **". . . guidance to staff as it relates to associated processes and procedures in order to maximize the benefits and minimize the risks."** - Government Finance Officers Association

- Federal Grants Policy vs. Organization's Grants Policy

  - Uniform Guidance - Office of Management and Budget

  - State Laws and Regulations

Why is Grants Policy Important?

- Federal Awards = Scrutiny
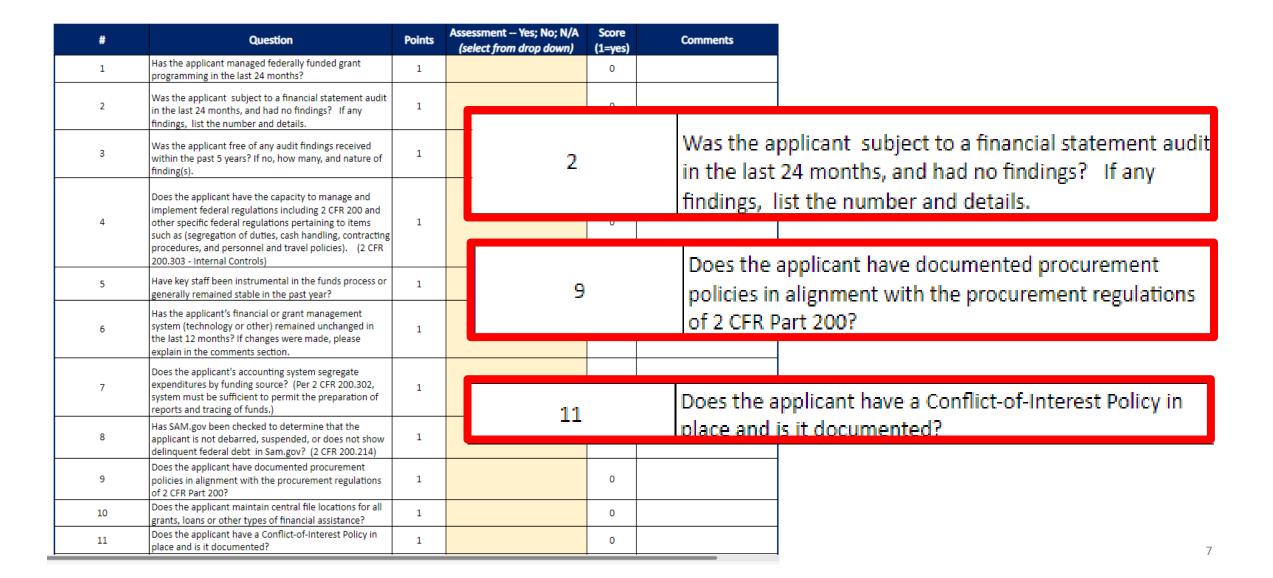
- Audit Repercussions

Ultimately, the auditor executing your Single Audit can only tell your story using the materials and documentation available, so the onus is on your organization to create and maintain this documentation of everything ranging from procurement to salaries.

- Warren Averett Accounting

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- Risk Assessment – Grantor Evaluation

Risk Assessment

#	Question	Points	Assessment -- Yes; No; N/A (select from drop down)	Score (1=yes)	Comments
1	Has the applicant managed federally funded grant programming in the last 24 months?	1		0	
2	Was the applicant subject to a financial statement audit in the last 24 months, and had no findings? If any findings, list the number and details.	1			
3	Was the applicant free of any audit findings received within the past 5 years? If no, how many, and nature of finding(s).	1			
4	Does the applicant have the capacity to manage and implement federal regulations including 2 CFR 200 and other specific federal regulations pertaining to items such as (segregation of duties, cash handling, contracting procedures, and personnel and travel policies). (2 CFR 200.303 - Internal Controls)	1			
5	Have key staff been instrumental in the funds process or generally remained stable in the past year?	1			
6	Has the applicant's financial or grant management system (technology or other) remained unchanged in the last 12 months? If changes were made, please explain in the comments section.	1			
7	Does the applicant's accounting system segregate expenditures by funding source? (Per 2 CFR 200.302, system must be sufficient to permit the preparation of reports and tracing of funds.)	1			
8	Has SAM.gov been checked to determine that the applicant is not debarred, suspended, or does not show delinquent federal debt in Sam.gov? (2 CFR 200.214)	1			
9	Does the applicant have documented procurement policies in alignment with the procurement regulations of 2 CFR Part 200?	1		0	
10	Does the applicant maintain central file locations for all grants, loans or other types of financial assistance?	1		0	
11	Does the applicant have a Conflict-of-Interest Policy in place and is it documented?	1		0	

2 — Was the applicant subject to a financial statement audit in the last 24 months, and had no findings? If any findings, list the number and details.

9 — Does the applicant have documented procurement policies in alignment with the procurement regulations of 2 CFR Part 200?

11 — Does the applicant have a Conflict-of-Interest Policy in place and is it documented?

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- Grant Agreement Negotiations – Ex. Hydrogen Hub

Rely on Existing Resources

Pre-award Considerations

- Notification Requirement
- Procurement
- Financial Review/Funding Analysis
- Understanding Grant Terms and Conditions

Office of Procurement and Contracts

COMPLIANCE RESOURCE LIBRARY

Job Aids by Grant Phase

(*) – Job Aid Appears in Multiple Phases

PRE-AWARD	AWARD	POST-AWARD	CLOSE-OUT
Need Assessment/Planning & Preparation	Procurement and Contracting/Sub-Awards	Implementation, Reporting and Monitoring	Closeout Processes/Final Reporting/Audit

Procurement Resources

Public Procurement – Introduction and First Steps

Public Procurement Definition

Public procurement is the process local, state, and federal government agencies use to acquire necessary goods and services through purchases from for-profit and not-for-profit businesses. Public procurement laws and regulations *must be followed to ensure taxpayer money is properly spent, and goods/services responsibly purchased*.

Public Procurement Policy

Federal regulations require that documented procurement procedures be in place, consistent with State, local, and tribal laws and regulations, and *must conform to (be the same or stricter than) the standards identified in the Uniform Guidance* -- 2 CFR 200.317 through 200.327, Electronic Code of Federal Regulations (eCFR).

A public procurement policy *describes the process and defines the legal requirements of purchasing goods and services* from suppliers, vendors, and contractors. Purchasing is based on pre-negotiated fair prices and a pre-determined set of terms.

Office of Procurement and Contracts | Kansas Department of Administration (ks.gov)

Award and Post Award Considerations

- Federal Regulations: Davis-Bacon, National Environmental Policy Act (NEPA), Civil Rights Act, Build America Buy America (BABA)
- Allowable Costs
- Conflicts of Interest
- Pass-Through/Subrecipient Monitoring

Resource Summary

- [Office of Recovery: Job Aids by Phase](#)
- [KS Office of Procurement and Contracts](#)
- [Davis Bacon](#) – Dept. of Labor
- [Uniform Guidance](#) – National Archives
- State and Federal Agency Websites
- Other Cities
- Grant Readiness Checklist
- Capacity Extension Team

Questions?

Thank you