

NEW GRANTEE ORIENTATION WEBINAR #3

OGM POLICIES AND PROCEDURES

I HAVE A CED GRANT...NOW WHAT?

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CED

Community Economic Development

ACF Office of Grants Management

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Overview

- Roles and Responsibilities of OGM
- Policy Guidance for the Use of Grant Funds
- Division of Payment Management
- Federal Financial Reporting (SF-425)
- Program Progress Reports
- Budget Modifications
- No-Cost Extensions
- Federal Reversionary Interest
- Helpful Websites
- Questions

Roles and Responsibilities

- The Office of Grants Management (OGM) and the Office of Community Services (OCS) jointly administer the CED grants.
- OCS and OGM have different areas of responsibility and expertise
- Roles are distinct, but complementary

OGM Roles for Grant Administration

- Responsible for business and other non-programmatic areas of grant award and administration
- Ensuring compliance with applicable laws, regulations, policies, and procedures and technical aspects of grants and fiscal monitoring.
- Official receipt point for SF-425 reports and requests for prior approval (via GrantSolutions)

OGM Roles for Grant Administration

- Contact OGM for the following:
 - Requesting amendments to the original grant application, such as changes in key personnel.
 - Clarification of budget issues, particularly allowability of costs
 - Guidance on submitting fiscal reports and other official correspondence

Grants Management Contacts

- The Grants Management Specialist identified in GrantSolutions should be consulted on all financial and non-programmatic aspects of the grants.

Grants Management Contacts

Grants Management Specialist	Email	Telephone	States/Territories
Sandra Adams	sandra.adams@acf.hhs.gov	(202) 401-4663	GA, HI, IA, IN, LA, NM, RI, SD, VA, WV
Telina Bennett-Reed	telina.bennett@acf.hhs.gov	(202) 401-4609	AK, AZ, IL, MD, MO, NV, OR, WY
Anthony Hilliard Retired 1/3/2018 To Be Reassigned by 1/12	anthony.hilliard@acf.hhs.gov	(202) 205-3585	CA, KS, KY, ME, MN, NH, NJ, ND, PR, SC, UT, VT, VI
Twanna Nickens	twanna.nickens@acf.hhs.gov	(202) 260-5319	AL, AR, FL, ID, MA, MS, MT, NC, OK, TN
Marcus Perkins	marcus.perkins@acf.hhs.gov	(202) 690-7883	CO, DE, NE, NY, PA, WA
Monique Weatherspoon	monique.weatherspoon@acf.hhs.gov	(202) 401-9236	CT, DC, MI, OH, TX, WI

Grants Policy Statement

- Provides general terms and conditions for all HHS discretionary grants and cooperative agreements
- Four sections:
 - Part I: HHS Grants Process
 - Part II: Terms and Conditions of HHS Grant Awards
 - Part III: Points of Contact
 - Part IV: OPDIV-Specific Information and Terms and Conditions

<https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>

Standard Terms and Conditions

- All recipients of ACF discretionary grants and cooperative agreements are legally bound by the standard terms and conditions that are based on statutes, regulations and policies.
- The Department of Health and Human Services Grants Policy Statement (HHS GPS) is the document that provides the general terms and conditions of HHS discretionary grant and cooperative agreement awards. These general terms and conditions are common across all HHS Operating Divisions.
- The New Link to ACF Post-Award requirements is:
<http://www.acf.hhs.gov/grants/post-award-requirements>

Grants Policy Information

- In December 2013, OMB published Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200
- Referred to as the “Super Circular” or “Omni Circular”
- Regarding standard terms and conditions for your award, the New Link to ACF Post-Award requirements is:
<http://www.acf.hhs.gov/grants/post-award-requirements>

Grants Policy Information

- The Omni Circular encompasses and supersedes guidance previously contained in the following:
 - Uniform Administrative Requirements, 45 CFR Parts 74 and 92 - provides guidance on administrative requirements for both HHS the awarding agencies and grant recipients
 - Cost Principles, 2 CFR Parts 220, 225, and 230 (OMB Circulars A-21, A-87, and A-122) – outline allowable uses of grant funds
 - Audit Requirements, OMB Circular A-133 – provides guidance on single audit requirements for recipients of federal grant funds

Grants Policy Information

- HHS has published its implementation of 2 CFR 200 in 45 CFR Part 75

Payment Management Services

(formerly the Division of Payment Management)

- Part of the HHS Program Support Center, which is separate from ACF
- PMS provides the payment and accounting system for all HHS grants
- Grantees are responsible for requesting payments and reporting disbursements to the Payment Management System via quarterly FFR reports

Payment Management Services

(formerly the Division of Payment Management)

- Requires quarterly reporting via the Payment Management System
- OGM can act as a liaison if problems arise, but has no direct control over PMS operations
- PMS website - <https://pms.psc.gov/>

Program Progress Reports – SF-PPR

- Semi-annual reporting after second and fourth quarters (every six months) for duration of project period – same due dates as FFR, with final due 90 days after the end of the project period
- Submit reports via OLDC per OCS instructions

Federal Financial Reporting (SF-425)

- Semi-annual reporting after second and fourth quarters (every six months) for duration of project period
- Due 30 days after end of period
- For project period 9/30 – 9/29:
 - 1st Report: Due 4/30 (covers 9/30-3/31)
 - 2nd Report: Due 10/31 (covers 4/1-9/29)

Federal Financial Reporting (SF-425)

- A final SF-425 is due 90 days after the end of the project period.
 - If Project period ends 9/29 then the final report is due 12/30
- The SF-425 and the PMS Payment Management System disbursement report for the reporting period must reconcile.
- Must be submitted electronically in Payment Management Systems

Federal Financial Reporting (SF-425)

***Beginning with all FY 2016 new awards, both the SF-425 and FCTR forms must be submitted to HHS PMS. In this pilot, ACF and the HHS Program Support Center are collaborating in the submission of the SF-425 to reduce the burden on grantees and to assist with the reconciliation of expenditures and disbursements to support the timely close-out of grants.

Grantees awarded before FY 2016 will continue to upload the SF-425 reports in Grant Solutions.

SF-428/429 Reports

- SF-428 – Tangible Personal Property
- SF-429 – Real Property Status Report
- Annual reporting required

Submitting Original Financial Status and SF428/429 Reports

- GrantSolutions as a GrantNote and follow-up email to grants management specialist
- OGM is suggesting this year that OCS issue a information memoranda (IM) on real property funded under CED grants, specific to the Funding Opportunity Announcement (FOA); OGM issued updated guidance in September 2016 for the property reporting requirements for all grantees *see handout

Please see the OMB Number: 4040-0016, expiration date 1/31/2019 for the Instructions for the SF-429 Real Property Status Report * *OGM sent this to OCS for this webinar; please see attached*

GrantSolutions

- Grantee control over submission of post-award amendments
- Continue to communicate with Grant and Program Specialists outside of the system
- Contact OGM with questions

GrantSolutions

- User roles
 - Only AO and PI/PD roles in GrantSolutions have access to make any requests or upload documents; other roles have “read-only” access
 - OGM is responsible for ensuring the AO and PI/PD for grants have access to GrantSolutions – direct questions to your Grants Management Specialist
 - OGM can only add the AO and PI/PD roles to GrantSolutions. Grantees must contact GrantSolutions to add other roles.

Budget Modifications

- Report any modifications of the budget and program activities as outlined in the original application
- Includes change in scope and key personnel changes
- See 45 CFR 74.25

Budget Modifications

- Prior approval is necessary for:
 - Extension of budget or project period
 - Change in scope of work or objectives of the project (even if the budget does not change)
 - Change in the Project Director (PD) or Principle Investigator (PI) or other key personnel specified in the grant application
 - Absence for more than 3 months or 25 percent reduction in time devoted to the project by the PD or PI
 - Significant rebudgeting

Budget Modifications

- Follow instructions in GrantSolutions for requesting a budget modification
- Requests will include:
 - Standard forms built in to GrantSolutions
 - Cover letter – upload
 - Budget narrative – upload

No-Cost Extensions

- No-Cost Extensions are requested to complete activities of the grant in the final year of the project period.
- Requests are not approved merely for the purpose of using unobligated balances.
- Requests should be made 45 days prior to the end of the project period and are one-time extensions of the expiration date up to 12 months.
- The no-cost extension does not authorize additional spending or any new activities beyond the purposes consistent with the original award.

No-Cost Extensions

- Federal appropriations law (P.L. 101-510 National Defense Authorization Act of 1991) dictates that funds expire at the end of five years and are no longer available for drawdown.
- For grants with five-year project periods, all funds must be drawn down by the original end date of the project period.
- No-cost extensions may still be granted for the completion of incomplete program activities, but grant funds not drawn down by the end of the project period will be lost.

No-Cost Extensions

- Follow instructions in GrantSolutions for requesting a no-cost extension
 - All SF-425s and PPRs from previous and current budget periods must be on file
- Requests will include:
 - Standard forms built in to GrantSolutions
 - Cover letter – upload
 - Revised expiration date
 - Supporting reasons for request
 - Remaining balance

Real Property and Federal Interest

- For grant projects in which Federal interest is generated, a Notice of Federal Interest must be filed and a copy must be sent to the Office of Grants Management
- For grant projects that involve loans or equity investments, grant funds will remain restricted until a Disposition of Assets is submitted to the Office of Grants Management

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Helpful Websites

- ACF Homepage: www.acf.hhs.gov
- System for Award Management: www.sam.gov
- Central Contract Registration (CCR) has been consolidated with Sam.gov
- Dun and Bradstreet Data Universal Numbering System (DUNS): <http://www.dnb.com/>
- ACF Standard Terms and Conditions: The New Link to ACF Post-Award requirements is:
<https://www.acf.hhs.gov/discretionary-post-award-requirements#chapter-1>

Helpful Websites

- GrantSolutions - <https://www.grantsolutions.gov>
- Standard grant forms - <http://www.acf.hhs.gov/grants-forms>
- OMB circulars - <https://www.whitehouse.gov/omb/circulars/>
- Online CFR - <https://www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR>
- HHS Grants Policy Statement - <https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>