

CDC Foundation Federal Grants Management Training

Reference Guide

Overview

This Federal Grants Management Reference Guide is a detailed companion to a self-guided three-video federal grants management training series. The training series provides grantees with the information needed to assist with the successful and compliant management of federal grants and cooperative agreements. This Reference Guide may be reviewed and updated as needed.

The CDC Foundation awarded a contract to Grants Works, a grants consulting company, to develop the training series and Reference Guide to provide practical, informative, and recipient-centered federal grants management training.

The Reference Guide material aligns with the three-module training series and is broken into the following sections:

- Federal Grants Basics
- Notice of Award, Award Budget, and Subrecipients
- Federal Grant Management

A grant management toolbox that contains links to additional resources is located at the end of most sections.

Examples contained throughout the Reference Guide are based upon Center for Disease Control and Prevention (CDC) protocol. However, the guidance contained within the Reference Guide is relevant to recipients of federal funds from all federal agencies.

This Reference Guide is funded by the CDC Foundation through a cooperative agreement by the Centers for Disease Control and Prevention of the U.S. Department of Health and Human Services (HHS) as part of a financial assistance award totaling \$545,000 with 100 percent funded by CDC/HHS. The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by CDC/HHS, or the U.S. Government.

Disclaimer

The authors used their best efforts to prepare these materials and make no representations of warranties, express or implied, of any kind with respect to the applicability, accuracy, or completeness of the contents. The content in the self-guided online training series and this Reference Guide are based on federal regulations, federal administrative guidance, and agency-specific resources.

The advice and strategies contained herein may not be suitable for a particular situation. The learner is solely responsible for any use or application of the information presented in the online training series and this companion Reference Guide.

The information in the video training series and this Reference Guide are not intended as legal advice. Please refer to the award terms and conditions, agency regulations, other federal regulations and federal administrative guidance for further direction.

Learning Objectives

MODULE 1: FEDERAL GRANT BASICS

- Describe a federal grant
- Explain the difference between discretionary and formula grants
- Understand the grants lifecycle from the perspective of an awardee and the federal agency
- Understand the federal grant application process
- Identify key areas of a Notice of Funding Opportunity (NOFO)
- Access the online tools and portals used in the pre- and post-award stages of the grant lifecycle
- Understand the many functions and benefits of GrantSolutions for federal awarding agencies, pass-through entities, and recipients

MODULE 2: THE NOTICE OF AWARD, AWARD BUDGET, AND SUBRECIPIENTS

- Understand all the details in a CDC Notice of Award
- Identify the roles and responsibilities of the principal investigator and other key personnel of a grant-funded project
- Learn to assess and monitor an approved grant budget
- Understand the difference between direct and indirect costs, allowable costs and unallowable costs, and explain the different types of program income
- Determine the key role subrecipients have in the grant-funded project
- Review the pass-through entity or primary recipient's oversight responsibilities
- Determine how to classify a subrecipient from a contractor

MODULE 3: FEDERAL GRANT MANAGEMENT

- Understand the critical steps in the post-award phase of the grant
- Learn the relevance and importance of submitting timely programmatic and financial reports
- Understand how to establish an internal process for conducting and validating drawdowns
- Explain the grantee's audit requirements
- Learn to anticipate and prepare for award closeout
- Identify documents to be retained per federal record retention requirements

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Glossary

Allowable Costs – Costs that are allocable, budgeted, necessary, and reasonable for the performance of the federal award. Allowable costs must be consistent with the grantee’s treatment of other costs not funded by a federal award and be in accordance with Generally Acceptable Accounting Principles (GAAP).

Assistance Listing – Detailed public description of Federal programs that provide grants, loans, scholarships, insurance, and other types of assistance awards. Previously known as Catalog of Federal Domestic Assistance (CFDA).

Authorized Organizational Representative – The individual named by the applicant or grantee who is authorized to act on behalf of the organization and assume the obligations of the federal grant application or award.

Budget Narrative - A written justification of estimated costs in a proposed budget.

Budget Period - The start date of a funded portion of an award to the end date of that funded portion.

CAGE Code - The Commercial and Government Entity Code is a five position code that is a standard method of identifying entities doing business with the federal government.

Carryover – A process by which unobligated funds from one budget period is carried forward to the next budget period.

Catalog of Federal Domestic Assistance (CFDA) - A publicly available listing of federal financial assistance programs. This is now known as an Assistance Listing.

Centers for Disease Control and Prevention (CDC) – The national public health agency of the United States, housed under the U.S. Department of Health and Human Services. CDC is the funder of this Reference Guide.

Closeout - The process by which a federal awarding agency or pass-through entity determines that all applicable administrative actions are complete, and the non-federal entity has completed all required work of the federal award. This process requires the recipient to submit final program, financial, and other reports as outlined in the terms and conditions of the award.

Code of Federal Regulations (CFR) - An annual codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government.

Contract - In the context of grants or cooperative agreements, a contract is a legal instrument by which a recipient or subrecipient procures the services or products needed to carry out a project or program under a federal award.

Contractor - A non-federal entity that is contracted to provide products or services needed to carry out a project or program under a federal award.

Cooperative Agreement - A legal instrument of financial assistance between a federal agency and a recipient or a pass-through entity and a subrecipient that provides for substantial involvement by the federal agency or the pass-through entity.

De Minimis Rate - An indirect cost rate of up to 10% that may be calculated against an award recipient's modified total direct costs. The recipient must never have received a Federally negotiated indirect cost rate in order to use the de minimis rate.

Direct Costs - An expense or cost that can be specifically identified with a particular project, program, or activity. Examples of direct costs include salaries, travel, and program supplies. These costs directly support the federally-funded project or activity.

Drawdown - A process of electronically requesting funds from a federal agency to reimburse the non-federal entity for valid, budgeted, and allowable grant-funded expenditures. This process is normally performed by a lead finance official of a non-federal entity.

D-U-N-S Number - The Data Universal Numbering System or D-U-N-S number is a nine-digit unique identifier for businesses.

Expanded Authority - The authorization granted to recipients of Federal awards by the Federal agency that waives prior approval of specified post-award changes or actions.

Facilities and Administrative (F&A) Costs - Costs incurred by a recipient for a common or joint purpose that benefits more than one cost objective. F&A costs are also called indirect costs.

Federal Awarding Agency – The federal entity that provides the award funds.

Federal Cash Transaction Report (FCTR) - A financial report that is submitted on a quarterly basis within 30 days at the end of each calendar quarter.

Federal Financial Report (FFR) - A financial report that is submitted based on the frequency and/or deadlines outlined in the award terms and conditions. FFRs may be submitted quarterly, semi-annually, or annually. The report must include only funds authorized and disbursed during the timeframe covered by the report. The federally approved template for the FFR is Form SF-425. Another name for the FFR is the Financial Status Report.

Final Federal Financial Report - The recipient must submit their final FFR to the federal awarding agency. The deadline for the final FFR is generally outlined in the award terms and conditions.

Final Performance Progress and Evaluation Report (FPPER) - A standard final report used by the CDC which is collected at the end of the period of performance. The deadline is outlined in the award terms and conditions.

Financial Assistance - Assistance that non-federal entities receive from federal agencies in the form of grants, cooperative agreements, non-cash contributions or donations of property, direct appropriations, food commodities, and other financial assistance. Per OMB Uniform Guidance Subpart F, this definition also includes loans, loan guarantees, interest subsidies, and insurance.

Generally Accepted Accounting Principles (GAAP) – Set of rules that encompass the details, complexities, and legalities of accounting.

Grant - A form of federal financial assistance from federal awarding agencies to non-federal entities to support or stimulate a public purpose.

Grantee – The recipient of a grant or cooperative agreement. Also referred to as a Non-Federal Entity (NFE), recipient or awardee.

Grantee Financial Official – The individual who serves as the grantee's business official. This is typically the person who conducts the drawdowns and prepares the Federal Financial Report (FFR).

Grants.gov - An online tool that serves as a centralized location for grant seekers to find and apply for federal grants. It currently houses information for over 1,000 grant programs.

Grants Management Officer – The federal awarding agency official who is responsible for the business management aspects of grants and cooperative agreements.

Grants Management Specialist – The federal awarding agency official who oversees the business and other non-programmatic aspects of one or more grants or cooperative agreements.

GrantSolutions - A financial assistance management software program that enables federal agencies to administer grants and cooperative agreements through the award cycle. For recipients, GrantSolutions is a portal through which applications, awards, reports, and requests can be submitted to the federal awarding agency.

Indirect Costs - These costs are incurred for a common and joint purpose benefitting more than one cost objective and cannot be identified with a particular project, program, or activity. They are also known as Facilities and Administrative (F&A) costs.

Level of Effort - The amount of time key personnel contributes to a federally-funded project.

MPIN - A personal code created on the Business Information page during the SAM.gov registration process.

Modified Total Direct Costs - All direct salaries, wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward. It excludes equipment and several other cost categories.

Negotiated Indirect Cost Rate Agreement (NICRA) - A signed document that reflects an estimate of the indirect cost rate negotiated between the federal government and a grantee or contractor which reflects the indirect costs (facilities and administrative costs) incurred by the organization. This rate must be applied consistently across all federally funded projects.

No Cost Extension – The extension of the final budget period for a period of up to 12 months. Refer to the award Terms and Conditions, federal awarding agency administrative guidance, or contact the appropriate federal awarding agency official for instructions on how to request a no cost extension and if it is feasible.

Non-Federal Entity (NFE) - An organization, company, or municipality that carries out the activities of a federal award as a recipient or subrecipient. NFEs include local and state government agencies, nonprofit organizations, school districts, public housing agencies, Indian tribe, institution of higher education, or for-profit business.

Notice of Award (NOA) - A legal document issued by the federal awarding agency to notify the recipient that a grant award or cooperative agreement has been made to the recipient.

Notice of Funding Opportunity (NOFO) - A publicly available document in which a federal awarding agency announces its intention to award discretionary grants or cooperative agreements through a competitive application process.

Office of Management and Budget (OMB) - An office within the Executive Office of the President of the United States that is charged with implementing the President's vision across the Executive Branch. The OMB is the office that initially published what is commonly called "Uniform Guidance." The full title is *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* and it is the result of streamlining eight separate, sometimes entity-specific, OMB Circulars.

Pass-through Entity - A non-federal entity that provides a subaward to a subrecipient to carry out a part of a federally-funded project.

Payment Management System (PMS) - An online resource that facilitates the draw down of funds awarded in the support of approved activities and where awardees file the Federal Financial Report (FFR).

Performance Progress and Monitoring Report (PPMR) - A standard performance progress and evaluation report used by CDC's Office of Grant Services to collect performance information from award recipients.

Period of Performance (Project Period) - Total estimated time between the start of an initial federal award and the planned end date. A period of performance can have several budget periods.

Principal Investigator - The individual judged by the applicant or grantee to have the appropriate level of authority or responsibility to direct the project or program supported by the grant or cooperative agreement.

Prior Approval - An official request by the non-federal entity to make changes or adjustments to certain aspects of the federal grant before making the change.

Procurement - Acquisition of supplies or services by contract with federal funds.

Program Income - Gross income earned by the non-federal entity (grantee) that is directly generated by a supported activity (grant-funded activity) during the project period or period of performance and is earned as a result of the award.

Program Official – The federal awarding agency official responsible for monitoring the programmatic, scientific, and/or technical aspects of grants and cooperative agreements.

Progress Report (Program Report) - Reports submitted by the recipient and used by the federal agency to evaluate progress. Progress reports may be submitted monthly, quarterly, semi-annually, or annually. Frequency and deadlines are outlined in the terms and conditions of the award. Some federal agencies use progress reports to determine whether to provide funding for the budget period following that covered by the report. The progress report is also referred to as the performance or program report.

Redirection of Funds - The submission of a revised budget or the movement of funds between direct cost budget categories in an approved budget. Recipients must refer to the award terms and conditions to determine the re-budgeting threshold and when prior approval is required to redirect funds.

Solicitation - A publicly available document by which a federal agency announces its intention to award discretionary grants or cooperative agreements, usually through a competitive process. A solicitation is also known as a Notice of Funding Opportunity, Notice of Funding Announcement, Program Announcement, and other names depending on the federal agency.

Subaward - An award provided by a pass-through entity or a primary recipient to a subrecipient to carry out part of a federal award.

Subrecipient - A non-federal entity that receives a subaward from a pass-through entity or primary recipient to carry out part of a federally-funded program.

Terms and Conditions – A document that outlines the applicable terms, regulations, laws, policies, procedures, and administrative guidance that grantees must comply with. There are typically general and award-specific terms and conditions.

Uniform Guidance - A set of authoritative rules published by the Office of Management and Budget (OMB) that streamlines and consolidates requirements for receiving and using federal awards to reduce administrative burden and improve outcomes. The full title is *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

Unique Entity Identifier (UEI) - A new 12-character identifier that will be assigned to each entity that registers in SAM.gov.

Unobligated Funds - The amount of funds under a federal award that the non-federal entity has not obligated.

MODULE 1

Federal Grant Basics

WHAT IS A FEDERAL GRANT

To understand federal grants, it is important to start with the history of federal financial assistance from the U.S. federal government.

A Brief History of Federal Financial Assistance

Some of the first federal grants were land grants awarded to states through the Morrill Act of 1862. Congress passed the Act on July 2, 1862 to set aside federal lands for states to use the proceeds of the sale to create at least one college. There were no cost matching requirements and the federal government did not reserve the right to supervise states' expenditures. Stipulations were later added to grants through the second Morrill Act of 1890 and by 1895, provisions were made for federal audit.

By the early 1900s, the federal government began awarding grants to states for specific purposes such as to construct roads in rural areas through the Federal Aid Road Act of 1916 and vocational programs through the Smith-Hughes Act of 1917.

It was in the 1920s that the federal government began to regularly add matching requirements and grants began to look more like the modern grants system we know today.

The Federal Grant and Cooperative Agreement Act of 1977

The Federal Grant and Cooperative Agreement Act of 1977 evolved federal grant policy into its contemporary standards. Congress passed this Act to:

1. Guide government agencies by defining the roles of contracts, cooperative agreements, and grants;
2. Establish a governmentwide criteria for determining the appropriate legal instrument;
3. Distinguish between acquisition (procurement contracts) and assistance (grants and cooperative agreements) based on the principal purpose of the legal relationship between the parties.

Principal Purpose

If an agreement is of a direct benefit or use of the federal government, then it is considered a contract. If an agreement is for support or to stimulate a public purpose, the agreement is classified as a grant or cooperative agreement.

The Federal Financial Assistance Management Improvement Act of 1999

The Federal Financial Assistance Management Improvement Act of 1999 began to standardize administrative requirements. This Act resulted in:

1. Streamlined application and reporting processes;
2. The introduction or expansion of commonly used templates such as the Standard Form-424s and Standard Form-425 (Federal Financial Report);
3. The standardization of the program announcement template;
4. Establishment of [Grants.gov](https://www.grants.gov) as the primary location to post grant opportunities;
5. Development of the application submission module;
6. Establishment of uniform administrative rules and procedures;
7. The designation of Title 2 of the Code of Federal Regulations (CFR) for grants and agreements;
8. The shift of some cost principles to 2 CFR; and
9. Using the D-U-N-S number as the universal identifier on grant application forms and the SF-SAC (Data Collection Form for Reporting on Audits of States, Local Governments and Non-Profit Organizations).

The Grant Reporting Efficiency and Agreements Transparency (GREAT) Act of 2019

The GREAT Act of 2019 was passed to modernize reporting by recipients of federal grants and cooperative agreements by creating and imposing data standards and implement the Office of Management Budget's (OMB) recommendation to develop a "comprehensive taxonomy of standard definitions for core data elements, reduce the burden and compliance costs of recipients of federal grants and cooperative agreements through the strategic use of technology solutions, and strengthen oversight and management of federal financial assistance through federal agencies' consolidated collection and display of related data."

The Digital Accountability and Transparency Act (DATA) Act of 2014

The DATA Act requires the U.S. Department of Treasury and OMB to establish government-wide financial data standards for the information that agencies report to Treasury, OMB, and the General Services Administration and to publish this standardized spending data for free access and download. In addition, this Act was passed to:

1. Expand the Federal Funding Accountability and Transparency Act (FFATA) of 2006 by publicly disclosing federal agency expenditures and linking federal contract, loan, and grant spending information;
2. Simplify and streamlines reporting for entities that received federal funding; and

3. Improve the quality of the data submitted to [USASpending.gov](https://www.USASpending.gov) by holding federal agencies accountable for the accuracy and completeness of data reporting to the site.

Who Gets Federal Financial Assistance

Federal grants are awarded to different types of entities. Recipients include:

1. State and local health departments
2. Other state and local governments
3. Colleges and universities
4. Nonprofit organizations
5. Native American tribal governments
6. School districts
7. Housing authorities
8. Law enforcement agencies
9. For profit entities
10. Foreign entities

Types of Grants

There are two types of grants: discretionary and mandatory. Discretionary or project grants are those that are appropriated annually at the discretion of Congress and are awarded based on a competitive process.

Mandatory or formula grants are grants that are calculated by a formula based on variables such as population, Census data, and other data. They are intended to support a wide variety of objectives such as improving educational outcomes and increasing access to medical care. Medicaid is an example of a formula grant.

Grantmaking Agencies

According to Grants.gov, there are 39 grantmaking agencies. Below is a list of **some** of the current grantmaking agencies:

- Environmental Protection Agency
- National Aeronautics and Space Administration
- National Endowment for the Arts
- U.S. Agency for International Development
- U.S. Department of Agriculture
- U.S. Department of Education
- U.S. Department of Health and Human Services
- U.S. Department of Housing and Urban and Development
- U.S. Department of Transportation
- U.S. Department of the Treasury
- U.S. Department of Veterans Affairs

U.S. Department of Health and Human Services

The U.S. Department of Health and Human Services (HHS) is the lead agency in implementing the provisions of the Federal Financial Assistance Management and Improvement Act.

HHS is the parent agency of the Administration for Children and Families, U.S. Centers for Disease Control and Prevention (CDC), National Institutes of Health, Centers of Medicare and Medicaid Services, Indian Health Service, Substance Abuse and Mental Health Services Administration, U.S. Food and Drug Administration, and more.

HHS is also known as a Superagency as it awards the most federal financial assistance.

Below are relevant details about HHS and its governmentwide leadership and innovation in federal financial assistance:

1. Awarded 29 percent of all federal financial assistance in Fiscal Year 2019 according to the [Tracking Accountability in Government Grants System](#) (TAGGS). TAGGS is an HHS-managed online database of HHS grant award data.
2. Leads governmentwide grant management process improvements.
3. Developed and oversees Grants.gov, [GrantSolutions](#), [Payment Management System](#) and other online tools and resources.

Grant Lifecycle for Awardees

The awardee lifecycle begins with identifying a well-aligned funding opportunity and ends with the closeout. Other “awardee-specific” steps include submitting the application, implementing the program, managing the drawdowns, and submitting the various program and financial reports.

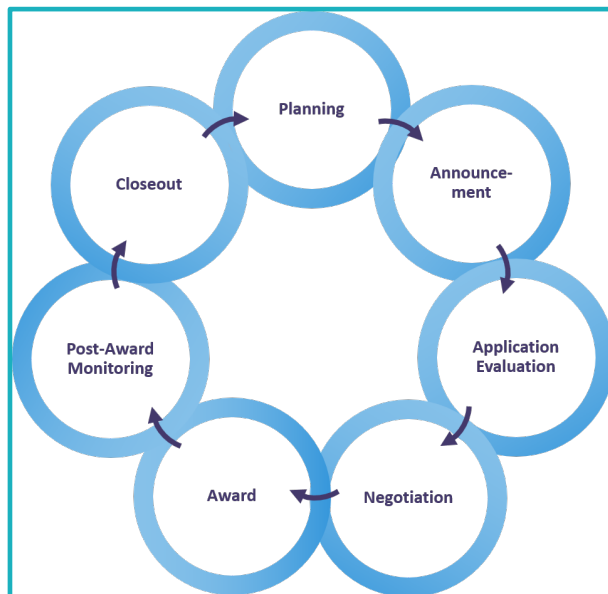
The following page shows a diagram of the awardee lifecycle.



Grant Lifecycle for Awardees

Grant Lifecycle for Federal Agencies

The grant lifecycle for federal agencies begins with agency-specific activities such as planning, releasing the announcement (Notice of Funding Opportunity), evaluating the applications, the awarding process, post-award monitoring of awardees, and closeout.

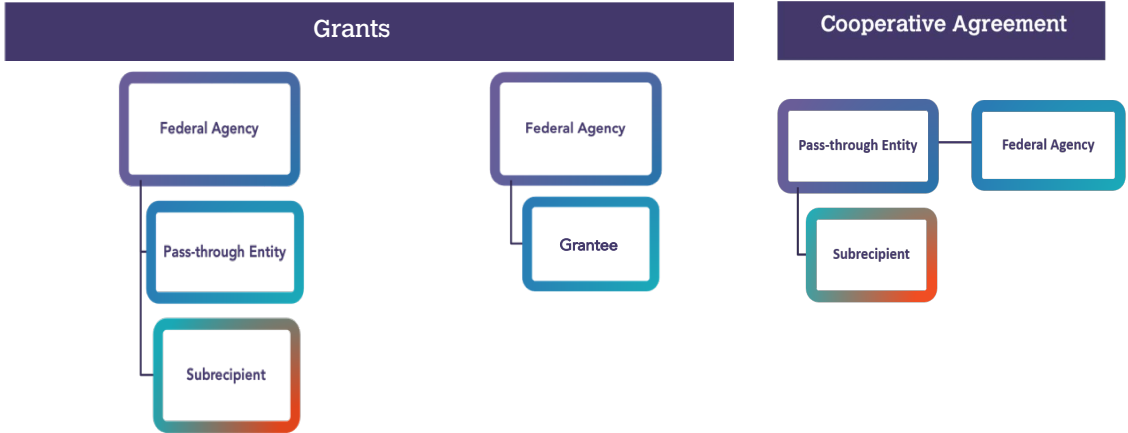


Grant Lifecycle for Federal Agencies

Types of Legal Instruments

There are two different types of agreements a non-federal entity can have with a federal agency: a grant agreement and a cooperative agreement. Unlike grant agreements, cooperative agreements include substantial involvement between the awardee and the pass-through entity or the federal agency.

Examples of financial assistance from a federal awarding agency:



Grant-funded Expenses

There are two different ways grants are paid to the non-federal entity. In both instances, grant-funded expenses must be allowable, reasonable, and allocable.

1. **Cost reimbursement:** Eligible project-related expenses are first financed with the non-federal entity’s own working capital. The non-federal entity then seeks reimbursement for those expenses from the federal agency through a reimbursement request or a drawdown.
2. **Advance payment:** The non-federal entity requests payment from the federal agency for eligible project-related expenses in advance of incurring the cost. The non-federal entity is required to have a financial management system and written procedures to minimize the time elapsing between the advance payment and disbursement by the non-federal entity. There are requirements such as ensuring payments are deposited into an insured, interest-bearing account and interest earning limits.

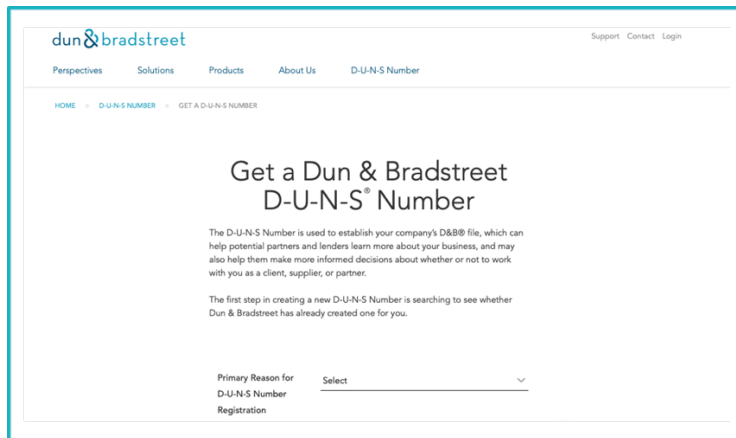
GRANTS MANAGEMENT TOOLBOX
<ul style="list-style-type: none"> • Title 2 of the Code of Federal Regulations • Grants.gov • GrantSolutions • Dun & Bradstreet • Payment Management System • Standard Form 424 Family • Standard Form 425 • Tracking Accountability in Government Grants System

APPLYING FOR A FEDERAL GRANT

Before applying for a federal grant, there are certain steps the grant seeking entity must take. The steps begin with first attaining a unique identifier for the entity that is seeking a grant, registering the entity in SAM.gov and then registering in the appropriate application portal such as Grants.gov. Below is a brief summary of each step including links to the relevant websites.

How to attain a D-U-N-S Number

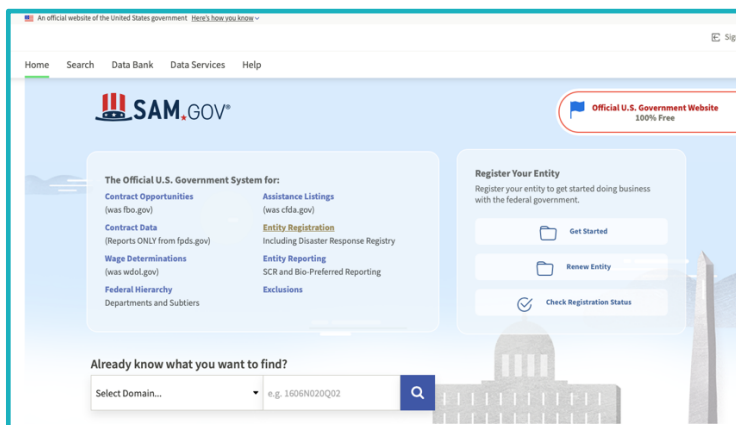
Step 1: A D-U-N-S number is assigned is by a company named [Dun & Bradstreet](#).



Dun & Bradstreet Webpage

Important! The federal government is transitioning from the D-U-N-S number to a Unique Entity Identifier (UEI) by April 2022.

Step 2: Complete entity (organization) registration in [SAM.gov](#).



SAM.gov homepage

Important! New entity registrations in SAM.gov will automatically be assigned a UEI.

Step 3: Await the assignment of a CAGE code 1-2 weeks after [SAM.gov](https://sam.gov) registration.

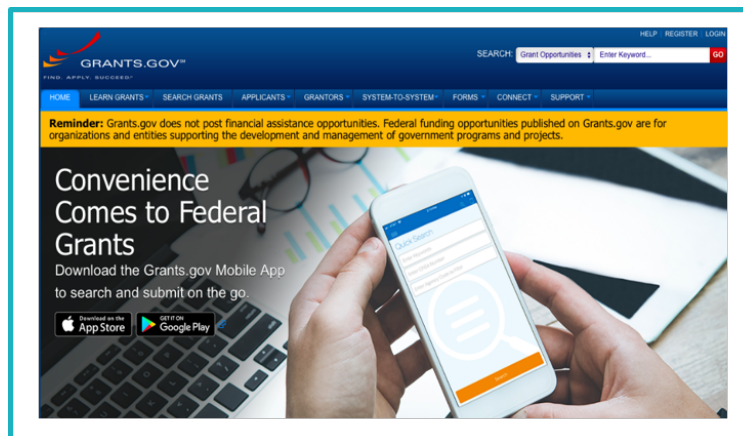
Step 4: Register in the relevant grant application portal.

Register in relevant portal

[Grants.gov](https://grants.gov) is the primary location where federal awarding agencies post grant opportunities and where applicants submit applications for grant funding.

Grants.gov also provides the following features:

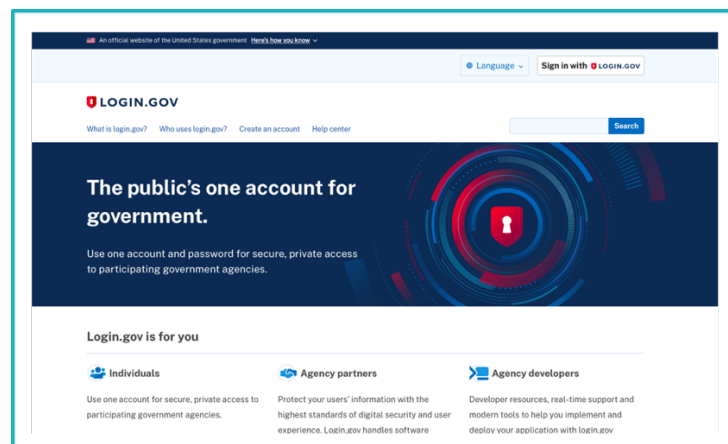
1. Check eligibility for funding
2. Get registered to submit an application
3. Subscribe to funding opportunities and manage subscriptions
4. Track grant applications



Grants.gov homepage

Using Login.gov

[Login.gov](https://login.gov) gives the public and participating federal agency partners a single and secure access point into their existing accounts, reducing the amount of login credentials needed.



Login.gov homepage

UNDERSTANDING THE NOFO

A Notice of Funding Opportunity (NOFO) is a document from a federal agency notifying the public of the intent to award a discretionary award after a competitive application process.

A grant seeking entity should carefully review the NOFO before applying to determine if the solicitation is in alignment with organizational goals, capacity, and existing or planned programming.

Below is a list of some of the crucial NOFO details to review:

1. Deadline
2. Eligibility requirements
3. Financial bandwidth
4. Any pre-application conference call
5. Executive summary
6. Funding restrictions
7. Number of planned awards
8. Any cost sharing requirements
9. Application review process

Developing a Workplan

Some of the key factors to consider when developing a workplan is ensuring alignment between the NOFO and the grantee's organizational capacity, prior experience, data requirements, bandwidth for long-term collaboration, and ability to adhere to evaluation and performance measurement metrics.

In addition, the workplan needs to be well written with clear, concise responses that are free of spelling and grammatical errors and fully adheres to the formatting instructions.

Developing a Budget and Budget Narrative

Two important components of the application are the budget and the budget narrative. It is critical to determine if there are required templates for the budget and budget narrative and have clear rationale for each itemized expense in the budget. Some federal agencies or subagencies have guidelines on preparing an application budget. (see [CDC's Budget Preparation Guidelines](#) below).

The guidelines detail how to budget for each expense. For example, the guidelines provide instructions on how to budget for grant-funded personnel expenses such salaries and wages, the percentage proposed to be covered by the grant, and the amount requested at that specific percentage.

Budget Preparation Guidelines

Office of Grants Services (OGS)

Preparing a budget can be one of the most confusing aspects of applying for a CDC grant or cooperative agreement. This document provides guidance for the preparation of a budget request and examples to help with the process. Adherence to this guidance will facilitate timely review and approval of a budget request.

Salaries and Wages

For each requested position, provide the following information: 1) name of staff member occupying the position, if available; 2) annual salary; 3) percentage of time budgeted for this program; 4) total months of salary budgeted; and 5) total salary requested. Also, provide a justification and describe the scope of responsibility for each position, relating it to the accomplishment of program objectives.

Sample Budget

Position Title and Name	Annual Salary	Time	Months	Amount Requested
Project Coordinator <i>Susan Taylor</i>	\$45,000	100%	12 months	\$45,000
Finance Administrator <i>John Johnson</i>	\$28,500	50%	12 months	\$14,250
Outreach Supervisor (Vacant*)	\$27,000	100%	12 months	\$27,000
Total Personnel				\$86,250

Sample Justification

The format may vary, but the description of responsibilities should be directly related to specific program objectives.

Job Description: Project Coordinator – (Susan Taylor)

This position directs the overall operation of the project including overseeing the implementation of project activities, coordination with other agencies, development of materials, provisions of service and training, collects, tabulates and interprets required data, program evaluation and staff performance evaluation. This individual is the responsible authority for ensuring reports and documentation are submitted to CDC. This position relates to all program objectives.

Fringe Benefits

Fringe benefits are usually applicable to direct salaries and wages. Provide information on the rate of fringe benefits used and the basis for their calculation. If a fringe benefit rate is not used, itemize how the fringe benefit amount is computed.

Centers for Disease Control and Prevention

Procurement and Grants Office (PGO)

CDC Budget Preparation Guidelines

Carefully review the instructions in each budget narrative category (salaries and wages, consultant costs, etc.) to provide an accurate and complete budget narrative. Keep in mind the following:

- A well-prepared budget should be reasonable and demonstrate that the funding being asked for will be used wisely.
- The budget should be as concrete and specific as possible in its estimates. Make every effort to be realistic and to estimate costs accurately.
- Each section of the budget narrative should be filled out in its entirety, including a justification for each listed expense.
- Budget clearly flows from the project plan as described in the program narrative.
- Ensure the proposed salaries are consistent with that paid for similar work within the applicant's organization.
- Fringe benefits should be based on actual known costs or an established formula that is detailed in the budget narrative.
- When justifying Consultant and Contractual costs, indicate whether the applicant will follow their organization's formal written procurement policy or the Federal Acquisition Regulation.

All costs included in the budget narrative must meet the federal government’s definition of an allowable cost. Please also review any additional funding restrictions provided by the federal awarding agency. Refer to the [Grant Budget](#) section to learn more about direct vs. indirect costs and how to determine if a cost is allowable.

Award Total	\$2,500,000
Year 2 Budget Total	\$1,250,000
Budget Period	October 1, 2019 - September 30, 2020
Period of Performance	October 1, 2019 - September 30, 2021
Internal Fund #	0500-20
Agency	U.S. Department of _____
Sub-agency	Bureau of _____
Line Item	Approved Budget
Salaries and Wages	\$1,090,000.00
Fringe Benefits	\$377,685.00
Total Personnel Costs	\$1,467,685.00
Equipment	\$0.00
Program Supplies	\$50,000.00
Travel	\$26,228.00
Construction	\$0.00
Other	\$450,000.00
Contractual	\$180,000.00
Total Direct Costs	\$2,173,913.00
Indirect Cost	\$326,087.00
Total Project Costs	\$2,500,000.00

**Example of a two-year award budget
(October 1, 2019 – September 30, 2021)**

Submitting the Application

With the workplan, budget, budget narrative, and other required components and supporting documents prepared and ready for upload, it is imperative that all documents are checked for accuracy and completeness in order to meet basic thresholds.

It is recommended that you submit 2-3 days before the application deadline, save both an electronic and paper copy of the full application for your records and retain the solicitation or NOFO to periodically revisit for program-specific guidelines.

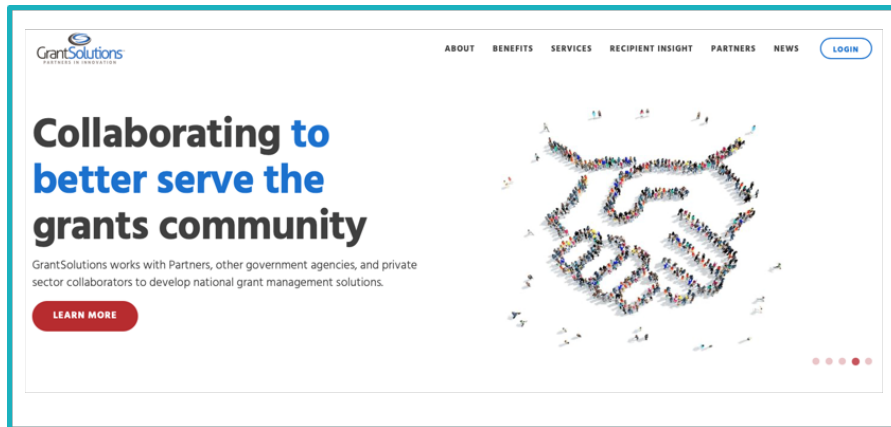
GRANTS MANAGEMENT TOOLBOX

- [CDC Budget Preparation Guidelines](#)
- [CDC How to Apply](#)
- [CDC Understanding the Notice of Funding Opportunity](#)
- [CDC Pre-Award Activities for Applicants](#)
- [CDC Application Resources](#)
- [Federal Acquisition Regulation](#)
- [Dun & Bradstreet](#)
- [Grants.gov](#)
- [Login.gov](#)
- [SAM.gov](#)
- [Standard Form 424 Family](#)
- [Standard Form 425](#)

GET TO KNOW GRANTSOLUTIONS

[GrantSolutions](#) is a web-based grants and program management solution used by multiple federal agencies. It is currently used for 40 individual discretionary and mandatory grants and approximately 1,500 grant programs managed through GrantSolutions. It also integrates with [Grants.gov](#) and [SAM.gov](#).

It is currently used by 28 federal agencies and subagencies and it has multiple modules that are used solely by the federal agency and others that are used by the agency and the awardee.



GrantSolutions.gov homepage

GrantSolutions: Grants Management Module

Awardees use GrantSolutions' Grants Management Module to manage their awards and do the following:

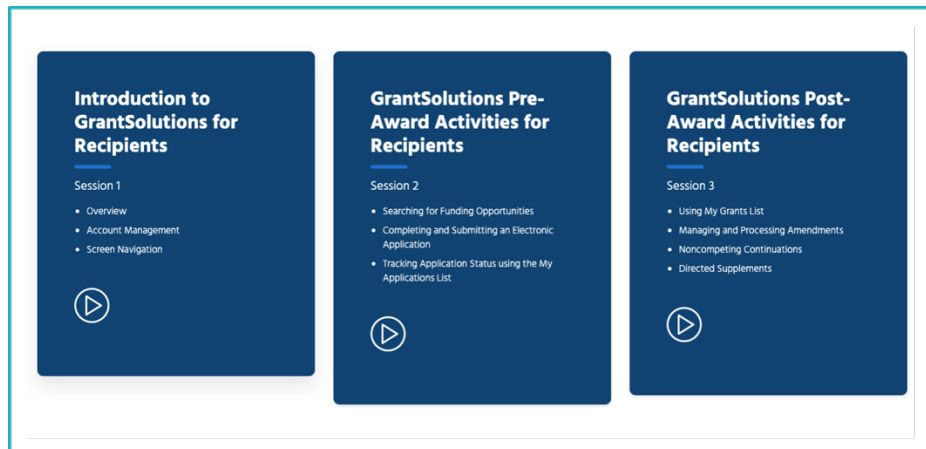
1. Access the initial and any subsequent Notices of Award
2. Assign recipient roles such as the Grantee Financial Official and Authorized Organizational Representative
3. Submit programmatic reports
4. Submit prior approval requests



GrantSolutions for Grants Recipients

GrantSolutions: Recipient Training Videos

GrantSolutions' Recipient Training videos provide an overview of GrantSolutions, the pre-award activities that recipients can manage in the system, and post-award activities that recipients will implement through the system.



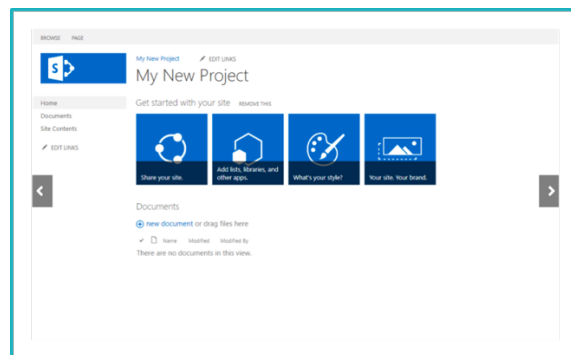
GrantSolutions Recipient Training Videos

Other Reporting Tools

There are other tools that a federal agency may use to capture program data or other information, including REDCap and SharePoint. These are not federally-managed systems but are tools that can be customized by an agency office or division to capture the specific information it needs from its awardees for its own reporting purposes.



REDCap is a secure, customizable web application for building and managing online surveys and databases.



SharePoint is a highly configurable, web-based collaborative platform that integrates in Microsoft Office.

GRANTS MANAGEMENT TOOLBOX

- [GrantSolutions for Grant Recipients](#)
- [GrantSolutions: Grant Recipient Actions, Roles, Notifications and Training](#)
- [GrantSolutions: Recipient Training Videos](#)

MODULE 2

The Notice of Award, Award Budget and Subrecipients

THE NOTICE OF AWARD

The Notice of Award (NOA) outlines important details about the federal grant or cooperative agreement. In addition to other details, the information below is typically included in an NOA:

1. Recipient Name, Address, and Congressional District
2. Employer Identification Number (EIN)
3. Recipient's D-U-N-S Number
4. Recipient's Principal Investigator/ Project Director and Authorized Organizational Representative
5. Awarding Agency Contact Information and Program Official
6. Award Number
7. Statutory Authority or Law Passed by Congress
8. Federal Award Project Title
9. Assistance Listing Number (formerly called the Catalog of Federal Domestic Assistance or the CFDA number)
10. Award Action Type (e.g. new, post-award amendment, etc.)
11. Budget Period Start and End Date
12. Direct Cost Amount
13. Indirect Cost Amount
14. Total Amount of Federal Funds Obligated for the Budget Period
15. Approved Cost Sharing or Matching Amount
16. Project Period or Period of Performance
17. Total Amount of the Federal Award

DEPARTMENT OF HEALTH AND HUMAN SERVICES Centers for Disease Control and Prevention		Notice of Award Award# 6 NUISAMPLE-01-02 FAD#9 NUIROSAMPLE Federal Award Date: 10/01/2019	
Recipient Information		Federal Award Information	
1. Recipient Name National Foundation for The Centers for Disease Control and Prevention, Inc. 600 Peachtree Street, NE Ste 1000 Atlanta, GA 30308-2215	11. Award Number: 6 NUISAMPLE-01-02	12. Unique Federal Award Identification Number (FAIN): NUIROSAMPLE	13. Statutory Authority: Section 311(c)(1) of the Public Health Service Act (42 U.S.C. Section 243 (c)(1))
2. Congressional District of Recipient 05	14. Federal Award Project Title: Sample Project Title	15. Assistance Listing Number: 93.391	16. Assistance Listing Program Title: Activities to Support State, Tribal, Local and Territorial Health Department Responses to Public Health or Healthcare Crises
3. Payment System Identifier (ID) 58-2106787	17. Award Action Type: Post-Award Amendment	18. In the Award R&D? No	Summary Federal Award Financial Information
4. Employer Identification Number (EIN) 58-2106787	19. Budget Period Start Date: 10/01/2020 - End Date: 09/30/2021	20. Total Amount of Federal Funds Obligated by this Action 20a. Direct Cost Amount: 1,086,957.00 20b. Indirect Cost Amount: 143,043.00	21. Authorized Carryover: 0.00
5. Data Universal Numbering System (DUNS) XXXXXXXXXX	22. Offset: 0.00	23. Total Amount of Federal Funds Obligated this budget period: 1,250,000.00	24. Total Approved Cost Sharing or Matching, where applicable: 0.00
6. Recipient's Unique Entity Identifier XXXXXXXXXX	25. Total Federal and Non-Federal Approved this Budget Period: 1,250,000.00	26. Project Period: Start Date 10/01/2019 - End Date 09/30/2021	27. Total Amount of the Federal Award including Approved Cost Sharing or Matching this Project Period: 2,500,000.00
7. Project Director or Principal Investigator Joseph A. Sample, PhD 600 Peachtree Street, NE Ste 1000 Atlanta, Ga 30308	28. Authorized Treatment of Program Income: Deduction	29. Grants Management Officer - Signature	
8. Authorized Official Jaw A. Sample, MBA 600 Peachtree Street, NE Ste 1000 Atlanta, GA 30308			
Federal Agency Information CDC Office of Financial Resources			
9. Awarding Agency Contact Information John R. Sample 1600 Clifton Road Atlanta, GA 30333			
10. Program Official Contact Information Ms. April Sample 1600 Clifton Road Atlanta, GA 30333			
30. Remarks			

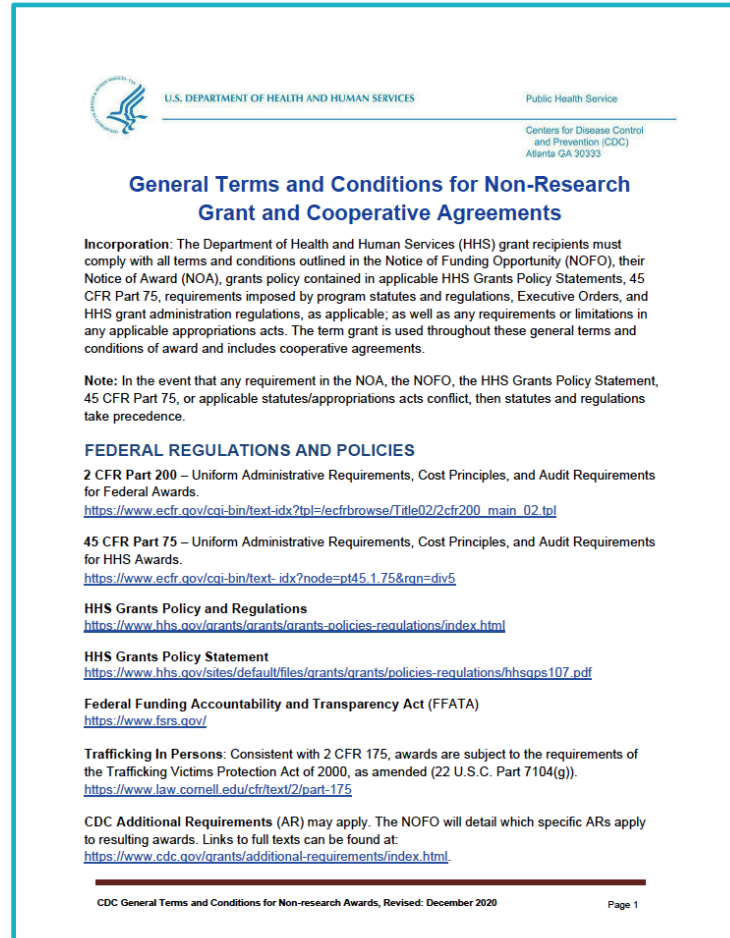
Example of a CDC Notice of Award – Page 1

DEPARTMENT OF HEALTH AND HUMAN SERVICES Centers for Disease Control and Prevention		Notice of Award Award# 6 NUISAMPLE01-02 FAD#9 NUIROSAMPLE Federal Award Date: 10/01/2019	
Recipient Information		33. Approved Budget (Excludes Direct Assistance)	
1. Recipient Name	31. Assistance Type Cooperative Agreement	i. Financial Assistance from the Federal Awarding Agency Only	
2. Congressional District of Recipient 05	32. Type of Award Other	ii. Total project costs including grant funds and all other financial participation	
3. Payment Account Number and Type 05		a. Salaries and Wages	1,090,000.00
4. Employer Identification Number (EIN) Data 782106787		b. Fringe Benefits	377,685.00
5. Universal Numbering System (DUNS) XXXXXXXXXX		c. Total Personnel Costs	1,467,685.00
6. Recipient's Unique Entity Identifier		d. Equipment	0.00
		e. Supplies	50,000.00
		f. Travel	36,238.00
		g. Construction	0.00
		h. Other	450,000.00
		i. Contractual	180,000.00
		j. TOTAL DIRECT COSTS	2,173,913.00
		k. INDIRECT COSTS	326,087.00
		l. TOTAL APPROVED BUDGET	2,500,000.00
		m. Federal Share	2,500,000.00
		n. Non-Federal Share	0.00
34. Accounting Classification Codes			
FA-ACCOUNT NO.	DOCUMENT NO.	ADMINISTRATIVE CODE	OBJECT CLASS
			AMT ACTION FINANCIAL ASSISTANCE
			APPROPRIATION

Example of a CDC Notice of Award – Page 2

Terms and Conditions

The Notice of Award also includes the general Terms and Conditions and any Special Terms and Conditions that govern the award.



The screenshot shows the title page of a document from the U.S. Department of Health and Human Services (HHS) and the Centers for Disease Control and Prevention (CDC). The title is "General Terms and Conditions for Non-Research Grant and Cooperative Agreements". The document includes an "Incorporation" section stating that grant recipients must comply with all terms and conditions outlined in the Notice of Funding Opportunity (NOFO), grants policy, 45 CFR Part 75, and applicable statutes. A "Note" states that in the event of conflict, statutes and regulations take precedence. The document lists several federal regulations and policies, including 2 CFR Part 200, 45 CFR Part 75, HHS Grants Policy and Regulations, HHS Grants Policy Statement, Federal Funding Accountability and Transparency Act (FFATA), and Trafficking In Persons. It also mentions CDC Additional Requirements (AR). The footer indicates the document is "Page 1" and was revised in December 2020.

CDC General Terms and Conditions for Non-Research Grant and Cooperative Agreements (Rev. 12/2020)

Terms and Conditions: Federal Regulations and Policies

General Terms and Conditions typically begin with the federal regulations and policies that are germane to the award.

In the example from the CDC on the next page, the Terms and Conditions include Uniform Guidance (also referred to as 2 CFR 200). 45 CFR 75 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards is also listed in this section. 45 CFR 75 is currently HHS' adoption of the original implementation of 2 CFR 200.

Other Federal regulations and policies listed in the general terms and conditions include:

- HHS Grants Policy and Regulations
- HHS Grants Policy Statement
- Federal Funding Accountability and Transparency Act
- CDC Additional Requirements

Terms and Conditions: Reporting Requirements

The deadlines and instructions to submit the Federal Financial Report (FFR or SF-425), Annual Performance Progress and Monitoring Report, Data Management Plan, any applicable audits, and other reports can be found in the reporting requirements section of the general Terms and Conditions.

REPORTING REQUIREMENTS

Annual Federal Financial Report (FFR, SF-425): The Annual Federal Financial Report (FFR) SF-425 is required and must be submitted no later than 90 days after the end of the budget period in the Payment Management System.

Additional guidance on submission of Federal Financial Reports can be found at <https://www.cdc.gov/grants/documents/change-in-federal-reporting-fy-2021-recipients.pdf>.

If more frequent reporting is required, the Notice of Award terms and conditions will explicitly state the reporting requirement.

Annual Performance Progress and Monitoring Reporting: The Annual Performance Progress and Monitoring Report (PPMR) is due no later than 120 days prior to the end of the budget period and serves as the continuation application for the follow-on budget period. Submission instructions, due date, and format will be included in the guidance from the assigned GMO/GMS via www.grantsolutions.gov.

Any change to the existing information collection noted in the award terms and conditions will be subject to review and approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act.

Data Management Plan: CDC requires recipients for projects that involve the collection or generation of data with federal funds to develop, submit and comply with a Data Management Plan (DMP) for each collection or generation of public health data undertaken as part of the award and, to the extent consistent with law and appropriate, provide access to and archiving/long-term preservation of collected or generated data. Additional information on the Data Management and Access requirements can be found at <https://www.cdc.gov/grants/additional-requirements/ar-25.html>.

Audit Requirement Domestic Organizations (including US-based organizations implementing projects with foreign components): An organization that expends \$750,000 or more in a fiscal year in federal awards shall have a single or program-specific audit conducted for that year in accordance with the provisions of 45 CFR Part 75. The audit period is an organization's fiscal year. The audit must be completed along with a data collection form (SF-SAC), and the reporting package shall be submitted within the earlier of 30 days after receipt of the auditor's report(s), or nine (9) months after the end of the audit period. The audit report must be sent to:

Federal Audit Clearing House Internet Data Entry System Electronic Submission:
[https://harvester.census.gov/facides/\(S\(0vkw1zaelvziibnahocq5i0\)\)/account/login.aspx](https://harvester.census.gov/facides/(S(0vkw1zaelvziibnahocq5i0))/account/login.aspx)

AND

Office of Financial Resources, Risk Management and Internal Control Unit's Audit Resolution Team (ART), RMICU.Audit.Resolution@cdc.gov.

CDC General Terms and Conditions for Non-research Awards, Revised: December 2020 Page 4

Reporting Requirements: CDC General Terms and Conditions for Non-Research Grant and Cooperative Agreements (Rev. 12/2020)

Terms and Conditions: General Requirements

General Requirements outline the conditions by which an award may be terminated “in whole or in part”, provide guidance on the use of federal funds for food and meals, prior approval requirements, how to treat federally-funded travel costs, key personnel, and more.

GENERAL REQUIREMENTS

Termination (2 CFR 200.340) applies to this award and states, in part, the following:

(a) *This award may be terminated in whole or in part:*

- (1) By the Federal awarding agency or pass-through entity, if a non-Federal entity fails to comply with the terms and conditions of a Federal award;
- (2) By the Federal awarding agency or pass-through entity, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities;
- (3) By the Federal awarding agency or pass-through entity with the consent of the non-Federal entity, in which case the two parties must agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated;
- (4) By the non-Federal entity upon sending to the Federal awarding agency or pass-through entity written notification setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if the Federal awarding agency or pass-through entity determines in the case of partial termination that the reduced or modified portion of the Federal award or subaward will not accomplish the purposes for which the Federal award was made, the Federal awarding agency or pass-through entity may terminate the Federal award in its entirety; or
- (5) By the Federal awarding agency or pass-through entity pursuant to termination provisions included in the Federal award.

Travel Cost: In accordance with HHS Grants Policy Statement, travel costs are allowable when the travel will provide a direct benefit to the project or program. To prevent disallowance of cost, the recipient is responsible for ensuring travel costs are clearly stated in their budget narrative and are applied in accordance with their organization's established travel policies and procedures. The recipient's established travel policies and procedures must also meet the requirements of 45 CFR Part 75.474.

Food and Meals: Costs associated with food or meals are allowable when consistent with applicable federal regulations and HHS policies. See <https://www.hhs.gov/grants/contracts/contract-policies-regulations/spending-on-food/index.html>. In addition, costs must be clearly stated in the budget narrative and be consistent with organization approved policies. Recipients must make a determination of reasonableness and organization approved policies must meet the requirements of 45 CFR Part 75.432.

Prior Approval: All requests which require prior approval, must bear the signature (or electronic authorization) of the authorized organization representative. The recipient must submit these requests no later than 120 days prior to the budget period's end date. Additionally, any requests involving funding issues must include an itemized budget and a narrative justification of the request.

The following types of requests are examples of actions that require prior approval, unless an expanded authority, or conversely a high risk condition, is explicitly indicated in the NOA.

General Requirements: CDC General Terms and Conditions for Non-Research Grant and Cooperative Agreements (Rev. 12/2020)

Terms and Conditions: Payment Information

The Payment Information section details where the grantee can initiate drawdowns. Closeout Requirements are also outlined in the Terms and Conditions, specifically the final administrative actions or reports grantees must submit in order to compliantly closeout the federal grant.

PAYMENT INFORMATION

Fraud Waste or Abuse: The HHS Office of the Inspector General (OIG) maintains a toll-free number (1-800-HHS-TIPS [1-800-447-8477]) for receiving information concerning fraud, waste, or abuse under grants and cooperative agreements. Information also may be submitted by e-mail to hhsips@oig.hhs.gov or by mail to Office of the Inspector General, Department of Health and Human Services, Attn: HOTLINE, 330 Independence Ave., SW, Washington DC 20201. Such reports are treated as sensitive material and submitters may decline to give their names if they choose to remain anonymous.

Automatic Drawdown (Direct/Advance Payments): Payments under CDC awards will be made available through the Department of Health and Human Services (HHS) Payment Management System (PMS), under automatic drawdown, unless specified otherwise in the NOA. Recipients must comply with requirements imposed by the PMS on-line system. Questions concerning award payments or audit inquiries should be directed to the payment management services office.

PMS Website: <https://pms.psc.gov> PMS
Phone Support: +1(877)614-5533
PMS Email Support: PMSSupport@psc.gov

Payment Management System Subaccount: Funds awarded in support of approved activities will be obligated in an established subaccount in the PMS. Funds must be used in support of approved activities in the NOFO and the approved application. All award funds must be tracked and reported separately.

Exchange Rate: All requests for funds contained in the budget, shall be stated in U.S. dollars. Once an award is made, CDC will generally not compensate foreign recipients for currency exchange fluctuations through the issuance of supplemental awards.

Acceptance of the Terms of an Award: By drawing or otherwise obtaining funds from PMS, the recipient acknowledges acceptance of the terms and conditions of the award and is obligated to perform in accordance with the requirements of the award. If the recipient cannot accept the terms, the recipient should notify the Grants Management Officer within thirty (30) days of receipt of the NOA.

Certification Statement: By drawing down funds, the recipient certifies that proper financial management controls and accounting systems, to include personnel policies and procedures, have been established to adequately administer federal awards and funds drawn down. Recipients must comply with all terms and conditions in the NOFO, outlined in their NOA, grant policy terms and conditions contained in applicable HHS Grant Policy Statements, and requirements imposed by program statutes and regulations and HHS grants administration regulations, as applicable; as well as any regulations or limitations in any applicable appropriations acts.

Payment Information: CDC General Terms and Conditions for Non-Research Grant and Cooperative Agreements (Rev. 12/2020)

What is Uniform Guidance?

Uniform Guidance is a set of authoritative rules published by the Office of Management and Budget (OMB) that streamlines and consolidates requirements for receiving and using federal awards to reduce administrative burden and improve outcomes. Formally titled, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, it is codified at Title 2 Code of Federal Regulations Part 200. Informally Uniform Guidance is referred to as 2 CFR 200 or Supercircular.

Uniform Guidance streamlined eight separate OMB Circulars and at 2 CFR 200.104 - Supersession, grantees are notified that Uniform Guidance supersedes all previous relevant OMB Circulars. It was adopted either in its entirety or supplemented by most, if not all, Federal awarding agencies.

The six subparts of Uniform Guidance are:

1. Subpart A - Acronyms and Definitions
2. Subpart B - General Provisions
3. Subpart C – Pre-Federal Award Requirements and Contents of Federal Awards
4. Subpart D – Post-Federal Award Requirements
5. Subpart E – Cost Principles
6. Subpart F – Audit Requirements and Appendix I-XII

Uniform Guidance for HHS Grantees

HHS' adoption of the original implementation of 2 CFR 200 is codified at 45 CFR 75. Here are just a few variables addressed in 45 CFR 75 that are not in the standard Uniform Guidance:

- 45 CFR 75.214 – Metric system of measurement
- 45 CFR 75.216 – Special provisions for awards to commercial organizations as recipients
- 45 CFR 75.218 – Participation by faith-based organizations
- 45 CFR 75.476 – Independent research and development costs

Order of Precedence

To determine which regulations and policies are applicable to the award, it is important that grantees first review the award terms and conditions for guidance and direction. The NOFO, or solicitation, may also provide program-specific requirements, restrictions, or guidance. Guidance may vary across federal awarding agencies. For example, HHS explicitly disallows costs that may be allowable in other federal grants.

When faced with conflicting guidance (e.g. 2 CFR 200 conflicts with the grantee organization’s policies and procedures), use the following order of precedence to guide the decision-making process.



Grantees can use the order of precedence to guide the decision-making process

GRANTS MANAGEMENT TOOLBOX
<ul style="list-style-type: none">• 2 CFR 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards• 45 CFR 75: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards• CDC General Terms and Conditions for Non-Research Grant and Cooperative Agreements• CDC Understanding Your Notice of Award (NOA)• HHS Grants Policy Statement

ROLES AND RESPONSIBILITIES

Both the grantee and agency have predetermined roles and responsibilities for an award. The descriptions of roles and responsibilities that follow are for standard non-research grants.

Grantee Roles and Responsibilities

- **Principal Investigator** is considered key personnel and serves as lead program or project contact for the federal grant recipient.
- **Grantee Financial Official** serves as the grantee's business official.
- **Authorized Organizational Representative** has the authority to enter into an agreement with the federal awarding agency.



Important! Prior approval is needed if a grantee seeks to change or remove key personnel.

Agency Roles and Responsibilities

- **Program Officer** is the federal official responsible for programmatic, scientific and / or technical aspects of a grant or cooperative agreement.
- **Grants Management Officer** is responsible for the business management aspects of grants and cooperative agreements.
- **Grants Management Specialist** oversees the business and other non-programmatic aspects of one or more grants or cooperative agreements.

If no equipment was acquired under an award, a negative report is required. The recipient must identify each item of equipment that it wishes to retain for continued use in accordance with 45 CFR Part 75. The awarding agency may exercise its rights to require the transfer of equipment purchased under the assistance award. CDC will notify the recipient if transfer of title will be required and provide disposition instruction on all major equipment.

Equipment with a unit acquisition cost of less than \$5,000 that is no longer to be used in projects or programs currently or previously sponsored by the federal government may be retained, sold, or otherwise disposed of, with no further obligation to the federal government.

CDC STAFF RESPONSIBILITIES

Roles and Responsibilities: Grants Management Specialists/Officers (GMO/GMS) and Program Officials (PO) work together to award and manage CDC grants and cooperative agreements. From the pre-planning stage to closeout of an award, grants management and program staff have specific roles and responsibilities for each phase of the grant cycle. Award specific terms and conditions will include contact information for the PO/GMO/GMS.

Program Official: The PO is the federal official responsible for monitoring the programmatic, scientific, and/or technical aspects of grants and cooperative agreements including:

- The development of programs and NOFOs to meet the CDC's mission;
- Providing technical assistance to applicants in developing their applications, e.g., explanation of programmatic requirements, regulations, evaluation criteria, and guidance to applicants on possible linkages with other resources;
- Providing technical assistance to recipients in the performance of their project; and
- Post-award monitoring of recipient performance such as review of progress reports, review of prior approval requests, conducting site visits, and other activities complementary to those of the GMO/GMS.

For Cooperative Agreements, substantial involvement is required from CDC. The PO is the federal official responsible for the collaboration or participation in carrying out the effort under the award. Substantial involvement will be detailed in the NOFO and award specific terms and conditions and may include, but is not limited to:

- Review and approval of one stage of work before work can begin on a subsequent stage;
- Review and approval of substantive programmatic provisions of proposed subawards or contracts (beyond existing federal review of procurement or sole source policies);
- Involvement in the selection of key relevant personnel;
- CDC and recipient collaboration or joint participation; and
- Implementing highly prescriptive requirements prior to award limiting recipient discretion with respect to scope of services, organizational structure, staffing, mode of operation, and other management processes.

Grants Management Officer: The GMO is the only official authorized to obligate federal funds and is responsible for signing the NOA, including revisions to the NOA that change the terms and conditions. The GMO serves as the counterpart to the business officer of the recipient

CDC General Terms and Conditions for Non-research Awards, Revised: December 2020 Page 16

CDC Staff Responsibilities: CDC General Terms and Conditions for Non-Research Grant and Cooperative Agreements (Rev. 12/2020)

THE GRANT BUDGET

One of the more critical aspects of managing a federal grant is managing and monitoring the grant budget. Below is an example of an approved budget, also called the award budget.

The example below is a two-year grant with an award total of \$2,500,000. The period of performance (project period) is October 1, 2019 – September 30, 2021.

Award Total	\$2,500,000
Year 2 Budget Total	\$1,250,000
Budget Period	October 1, 2019 - September 30, 2020
Period of Performance	October 1, 2019 - September 30, 2021
Internal Fund #	0500-20
Agency	U.S. Department of _____
Sub-agency	Bureau of _____
Line Item	Approved Budget
Salaries and Wages	\$1,090,000.00
Fringe Benefits	\$377,685.00
Total Personnel Costs	\$1,467,685.00
Equipment	\$0.00
Program Supplies	\$50,000.00
Travel	\$26,228.00
Construction	\$0.00
Other	\$450,000.00
Contractual	\$180,000.00
Total Direct Costs	\$2,173,913.00
Indirect Cost	\$326,087.00
Total Project Costs	\$2,500,000.00

**Example of a Two-Year Award Budget
(October 1, 2019 – September 30, 2021)**

Monitoring Grant-funded Expenses

Upon award, the grantee should set up the grant budget in the organization's financial management system and check that it matches the grant award. Over the course of the project, the grantee should regularly monitor expenses and check for the following potential budget irregularities:

1. Fluctuations in the overall budget total
2. Expenses hitting outside of approved line items
3. The correct indirect cost rate (if applicable) is consistently applied
4. Eligible staff salaries and fringe expenses are consistently applied
5. No expenses appear in a line item with \$0 budgeted

Direct Costs

A direct cost is a cost or expense that can be specifically identified with a particular project, program, or activity.

Examples of direct costs in the previous budget example are Salaries and Wages, Fringe Benefits, Program Supplies, Travel, Other, and Contractual.

Indirect Costs

Indirect costs are costs that are incurred for a common and joint purpose, benefit more than one cost objective, and cannot be identified with a particular project, program or activity. Indirect costs are also known as Facilities and Administrative (F&A) costs.

If an indirect cost rate applies to the project, ensure the division between direct and indirect costs are not in conflict.

To claim indirect costs, the applicant must either use a current, signed negotiated indirect cost rate agreement (NICRA) established with a cognizant federal agency or use the de minimis rate. Indirect costs can be applied to total direct costs excluding capital expenditures (buildings, individual items of equipment, alterations, and renovations), portion of each subaward in excess of \$25,000, and flow-through funds.

If a grantee does not have a NICRA, they can elect to use the de minimis rate of up to 10% of the modified total direct costs (MTDC). MTDC includes all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward. MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$25,000.

Examples of indirect costs include administrative salaries, utilities, rent or leasing costs, and accounting expenses.



Rent and Leasing Costs



Security



Utilities



Telephone

Allowable Costs

All costs included in a grantee's budget must meet the federal government's definition of an allowable costs. Costs charged to a federal award must be **allowable, allocable, reasonable, necessary, and consistently applied** regardless of the source of funds. All costs expended using federal funds must meet the following general criteria set forth in the [Uniform Guidance 2 CFR §200, Subpart E Cost Principles](#). Allowable costs must be:

- Necessary and reasonable for the efficient performance of the project;
- Not prohibited under state or local laws or regulations;
- Conform to any limitations or exclusions set forth in the terms and conditions of the federal award, or other governing regulations as outlined by the awarding agency;
- Consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the grantee;
- Not included as a cost or used to meet cost sharing or matching requirement of any other federal award in either the current or prior fiscal period;
- Adequately documented.

In addition to cost allowability, a grantee must also consider the reasonableness of a cost—is the cost reasonable in its nature and amount and would not exceed what would be incurred by a prudent person under the circumstances prevailing at the time.

Lastly, the grantee must also consider allocability:

- Can the cost be allocated or assigned to a particular federally-funded project or program?
- Was it incurred specifically for the award and can be distributed in proportions that “may be approximated using reasonable methods?”
- Is the cost allocable to federal awards under the provisions of the federal circular and determined in accordance with generally accepted accounting principles (except as otherwise provided for in the Federal circular)?

A good rule of thumb in determining if the cost is allowable is to ask whether the cost is crucial, necessary, and indispensable for carrying out the scope of the project. If the answer is yes and it meets the conditions listed above, then the cost is generally allowable.

Unallowable Costs

There are expenses that should never be charged to a federal grant. It is imperative that the grantee monitors the grant budget and related supporting documents to ensure unallowable expenses are never charged to a federal grant or cooperative agreement.

Examples of unallowable costs include:

- Alcoholic beverages
- Entertainment (with some very specific exceptions)
- Fundraising and investment management costs (some exceptions apply)
- Lobbying

The grantee should also refer to the NOA or NOFO for any project or federal agency specific unallowable costs.

If grantees are ever unsure of the allowability of a cost, please contact the project officer or grant officer for guidance.

Program Income

Program income is gross income earned by the grantee that is directly generated by a supported activity during the project period.

Program income can be additive, deductive, used for any matching or cost sharing requirements, and there are other compliant methods to apply program income. An example of program income is a grantee charging fees for services performed and using the collected fees toward the program or project that is also being funded by a federal grant, provided the agency has clearly noted that the fees are to be additive.

GRANTS MANAGEMENT TOOLBOX

- [Council on Financial Assistance Reform \(COFAR\) Federal Grants Management 101: Uniform Guidance Subpart E Cost Principles](#)
- [Disclosure of Lobbying Activities \(SF-LLL\)](#)
- [GrantSolutions Grants Management Module: Budget Revision Amendment \(Non-Research Grants\)](#)
- [U.S. Department of Justice Office of Justice Programs Grants 101: Develop a Budget](#)

SUBRECIPIENTS

In this section we will learn about subrecipients, including the non-federal entity or pass-through entity's role in awarding subawards, the considerations a pass-through entity must make to determine if they should make a subaward, and the monitoring requirements for subawards.

Pass-through Entities and Subrecipients

A pass-through entity is a non-federal entity that provides a subaward to a subrecipient to carry out a part of the federally funded program. For example, a state government can serve as a pass-through entity, making subawards to local nonprofits to carry out programmatic work.

A pass-through entity has a number of responsibilities when selecting subrecipients, extending a subaward, and monitoring subrecipients.



Important! Learn more at 2 CFR 200.332 - Requirements for pass-through entities.

When entering into a subaward the pass-through entity must ensure key information about the primary award and the subaward are included in its legal agreement with the subrecipient.

Here are **some** of the variables that must be included in a subaward with a subrecipient:

1. Federal award ID
2. Subrecipient's unique entity identifier
3. Period of performance of the primary award
4. Reporting requirements
5. Assistance Listing number and title—previously known as the CFDA
6. The requirements that flow down to the subrecipient

This is how the federal government started ensuring that the information shared with subrecipients was uniform and included the relevant primary award information.

Subrecipient Monitoring

Pass-through entities have other responsibilities. In addition to evaluating each subrecipient's risk of noncompliance, the pass-through entity must also:

1. Consider imposing additional conditions where appropriate
2. Monitor the activities of subrecipients

3. Verify subrecipients are audited
4. Consider if the results of subrecipients' audits, onsite reviews and other monitoring indicate the need for adjustment
5. Report on subawards of \$30,000 or more and executive compensation data in FSRS.gov
6. Consider taking enforcement action against noncompliant subrecipients

This level of responsibility requires the pass-through entity to stay abreast of federal requirements, the terms and conditions of its award with the federal agency, and other guidelines.

Subrecipient vs. Contractor Determination

It is important to understand the difference between a subrecipient and a contractor as they have different monitoring requirements under 2 CFR 200. The pass-through entity has to conduct risk assessments of potential subrecipients and ensure key federal award details are clearly outlined in the legal agreement. The determination is crucial for compliance with the federal award.

The determination list below has been widely used to help grantees determine whether the relationship they engage another entity is either as a subrecipient or a contractor.

Subrecipient vs. Contractor Determination

Subrecipient	Contractor
<ul style="list-style-type: none"> ● Federal assistance relationship ● Uses the funds to carry out a program for a public purpose specified in authorizing statute ● Performance helps recipient meet objectives of the Federal grant ● Has programmatic decision-making responsibilities ● Must comply with program / grant requirements ● Will not earn profit under the arrangement 	<ul style="list-style-type: none"> ● Procurement relationship ● Does not participate in the design of the project ● Provides goods and services within normal business operations ● Provides similar goods or services to many different purchasers ● Normally operates in a competitive environment ● Provides goods or services that are ancillary to the operation of the Federal program ● May earn a profit under the contract

Subrecipient vs. Contractor Determination

Below is an example of a subrecipient and an example of a contractor:

Subrecipient: An organization will host, staff, and implement vaccine literacy events in their community and report metrics needed to demonstrate the program effectiveness or challenges to the primary recipient of pass-through entity.

Contractor: A trainer's service is compliantly procured to provide standardized content on vaccine literacy to be distributed by the pass-through entity to its partner organizations.

GRANTS MANAGEMENT TOOLBOX
<ul style="list-style-type: none">• Federal Acquisition Regulation• FSRS.gov• 2 CFR 200.332 - Requirements for pass-through entities – Uniform Guidance• 45 CFR 75.352 - Requirements for pass-through entities - Uniform Guidance (HHS)

MODULE 3

Federal Grant Management

POST-AWARD MANAGEMENT

The post-award phase of a federal grant may start with negotiating the award. The post-award phase also includes implementing the funded project or program, submitting programmatic and financial reports, and completing all closeout requirements.

Negotiate the Award

Negotiate Award (Budget/Scope) is the first step in the post-award management process. Upon award, the grantee may have to adjust the workplan or project scope to align with the award amount, if different from the amount requested in the application. Items that can be negotiated during this phase include the project scope and activities, budget, and some of the award-specific terms and conditions. It is important to note that some provisions, legal requirements, and other terms such as those for high-risk grantees are nonnegotiable.

The federal agency likely has a process that requires that grantees submit proposed changes in writing and wait for written approval or a modified Notice of Award (NOA) before proceeding.

The Award Terms and Conditions

The next step is to carefully review the general and award-specific Terms and Conditions of the award.

It is important to review the award Terms and Conditions to be clear on the recipient's responsibilities as well as understand what provisions may need to flow down to any subrecipients.

Some of the other important items to note in the general or award-specific terms and conditions are:

1. Applicable federal regulations and policies
2. Reporting requirements and deadlines
3. Required prior approvals
4. Any expanded authority
5. Payment information
6. Closeout requirements

Internal Collaboration

The principal investigator or program director, recipient's grants officer, relevant finance staff, and others should meet at the onset of the grant-funded project to review the project scope, award budget, grant-funded personnel costs, any proposed and approved subrecipients, planned travel, program reporting deadlines, and financial reports.

Why Uniform Guidance Matters

Not following the requirements can result in the award being terminated and the organization being debarred from doing business with the government which can ultimately impact some of the services and programs that the award funded.

Here is a list of some of the important guidance from the Uniform Guidance that all federal recipients should review to ensure their award is managed in accordance with federal rules and regulations:

1. Grant-funded travel expenses – 2 CFR 200.475
2. Compensation – personal services – 2 CFR 200.430
3. Cost sharing – 2 CFR 200.306
4. Cost principles – 2 CFR 200 Subpart E
5. Grant-funded procurement – 2 CFR 200.317-327
6. Financial management – 2 CFR 200.302
7. Closeout – 2 CFR 200.344



Important! Recipients of financial assistance from the U.S. Department of Health and Human Services follow guidance in 45 CFR 75.

The same guidance can also be found in 45 CFR 75. Below is the same list with relevant subparts in 45 CFR 75. In some instances, the subparts are the same and in other instances, they differ.

1. Grant-funded travel expenses – 45 CFR 75.474
2. Compensation – personal services – 45 CFR 75.430
3. Cost sharing – 45 CFR 75.306
4. Cost principles – 45 CFR 75 Subpart E
5. Grant-funded procurement – 45 CFR 75.326-335
6. Financial management – 45 CFR 75.302
7. Closeout – 45 CFR 75.381

Order of Precedence

There is an [Order of Precedence](#) one should follow when trying to determine what rule or guidance takes precedence. To determine which regulations and policies are applicant to the award, it is important that grantees first review the award terms and conditions for guidance and direction. The order starts with the Constitution at top, followed by Statutes (Laws/Acts), below statutes are Program Regulations, Executive Orders are below Program Regulations, Administrative Regulations are next, then Terms and Conditions of the award, and Your Organization's Policies follow the terms.

REPORTS AND DRAWDOWNS

One of the basic requirements of a federal grant is reporting. There are generally a variety of program and financial reports that must be submitted during the grant and closeout.

Program Reports

Program or progress reports document and highlight the progress made on the grant-funded project or program. Program reports may need to be submitted monthly, quarterly, semi-annually, or annually. Program reports can also be utilized by the federal agency as a non-competing continuation award for multi-year awards.

It is essential to refer to the award Terms and Conditions to be certain which reports are required, as well as when and where to submit the reports.

Alignment with the Workplan

The overall goal of program reports is to document progress, challenges, and accomplishments. Program reports should align with the most current approved workplan.

The data collected should capture the metrics necessary to demonstrate the funding objectives are being met and the project or program activities described in the program report should sufficiently summarize how the performance objectives are being met.

Reports may need to include quantitative and qualitative values. Outputs are generally reported as quantitative values. For example, 150 youth participated in yearlong mentoring program. An outcome may be the reduction in chronic absenteeism for those youth participants by 40% (the impact is the outcome).

The Performance Progress and Monitoring Report

The Performance Progress and Monitoring Report (PPMR) is a standard performance report used by CDC's Office of Grant Services to collect performance information from award recipients.

Performance Progress and Monitoring Report				
OMB Approval Number: 0920-1132 Expiration Date: 10/31/2022			Page	of Pages
1. Federal Agency and Organization Element to Which Report is Submitted Maximum characters: 140		2. Federal Grant or Other Identifying Number Assigned by Federal Agency Maximum characters: 160		3a. DUNS Number
				3b. EIN
4. Recipient Organization (Name and complete address including zip code) Maximum characters: 160			5. Recipient Identifying Number or Account Number	
6. Project/Grant Period Start Date: (Month, Day, Year)		End Date: (Month, Day, Year)	7. Reporting Period End Date (Month, Day, Year)	
		8. Final Report? <input type="checkbox"/> Yes <input type="checkbox"/> No		
		9. Report Frequency <input type="checkbox"/> semi <input type="checkbox"/> annual <input type="checkbox"/> quarterly other, (if other, describe)		
10. Performance Narrative (attach performance narrative as instructed by the awarding Federal Agency)				
11. Other Attachments (attach other documents as needed or as instructed by the awarding Federal Agency)				
12. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.				

Page 1: CDC Performance Progress and Monitoring Report

Financial Reports: Federal Financial Report and Federal Cash Transaction Report

There are also financial reports that must be submitted. The Federal Financial Report (FFR) is a standard financial report that is submitted for federal grants. Some agencies require quarterly submission of the FFR and others only require an annual FFR. Check the Terms and Conditions that were sent with the Notice of Award for the frequency and deadlines of required financial reports.

A Federal Cash Transaction Report may also be required. As with the FFR, check the terms and conditions that were sent with the Notice of Award for the frequency and deadlines of this report.

View Burden Statement		Federal Financial Report (Follow form Instructions)		OMB Number: 4040-0014 Expiration Date: 02/28/2022	
1. Federal Agency and Organizational Element to Which Report is Submitted			2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)		
3. Recipient Organization (Name and complete address including Zip code)					
Recipient Organization Name:					
Street1:					
Street2:					
City:					
State:					
Country: USA: UNITED STATES					
ZIP / Postal Code:					
4a. DUNS Number		4b. EIN		5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)	
6. Report Type		7. Basis of Accounting		8. Project/Grant Period	
<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final		<input type="checkbox"/> Cash <input type="checkbox"/> Accrual		From: To:	
9. Reporting Period End Date					
10. Transactions					Cumulative
<i>(Use lines a-c for single or multiple grant reporting)</i>					
Federal Cash (To report multiple grants, also use FFR attachment):					
a. Cash Receipts					0.00
b. Cash Disbursements					0.00
c. Cash on Hand (line a minus b)					0.00
<i>(Use lines d-o for single grant reporting)</i>					
Federal Expenditures and Unobligated Balance:					
d. Total Federal funds authorized					0.00
e. Federal share of expenditures					0.00
f. Federal share of unliquidated obligations					0.00
g. Total Federal share (sum of lines e and f)					0.00
h. Unobligated balance of Federal Funds (line d minus g)					0.00
Recipient Share:					
i. Total recipient share required					0.00
j. Recipient share of expenditures					0.00
k. Remaining recipient share to be provided (line i minus j)					0.00
Program Income:					
l. Total Federal program income earned					0.00
m. Program Income expended in accordance with the deduction alternative					0.00
n. Program Income expended in accordance with the addition alternative					0.00
o. Unexpended program income (line l minus line m and line n)					0.00

Page 1: Federal Financial Report (FFR) or SF-425

Drawdowns (Payments): Payment Management System

A drawdown is a payment request from the federal awarding agency that is done on an as-needed basis and is a request for eligible, allowable, reasonable, allocable and budgeted expenses. It is typically performed by the grantee's financial official—such as the Controller, Director of Finance, or Chief Financial Officer.

It is the grantee's responsibility to maintain the records that substantiate those expenses and retain them per federal record retention requirements.

The Payment Management System (PMS) is a centralized payment and cash management system that is used by a number of federal agencies. It is the tool used by recipients to draw down funds and submit financial reports.

Not all federal agencies use PMS, so it is important to refer to the specific award documentation to know where to request payments.

If the federal awarding agency uses PMS, there are a several steps to take before requesting payment. One critical step is to establish an account in PMS and follow the instructions.



PMS.gov home page

On the Grant Recipients tab on the main menu, grantees can submit a New User Request, Make Changes, Deactivate a User, Add or Change your Bank, Return Funds, Update Contact Information and much more.

Drawdowns (Payments): Restrictions

There are instances when drawdowns may be restricted. Some of the reasons that can cause a drawdown to be restricted include:

1. Failure to submit reports by the deadline;
2. Determination by federal staff who monitor payment activity that previous drawdowns were excessive;
3. Failure to prepare and submit any required annual audit and submit it to the Federal Audit Clearinghouse;
4. The award is closed or beyond the award reconciliation time period.

GRANTS MANAGEMENT TOOLBOX

- [CDC Performance Progress and Monitoring Report](#)
- [CDC - Reporting](#)
- [CDC Guidance: Federal Reporting: Changes Starting Fiscal Year 2021](#)
- [Federal Audit Clearinghouse](#)
- [Federal Cash Transaction Report \(FCTR\)](#)
- [Federal Financial Report \(FFR\)](#)
- [Payment Management System](#)
- [PMS Training Guide and Webinars](#)
- [PMS Request New User Access](#)

PRIOR APPROVALS

What are Prior Approvals

Prior approvals are post-award actions that require federal awarding agency authorization before proceeding.

Some types of prior approvals taken from an example of the general Terms and Conditions are:

1. Use of unobligated funds from prior budget period (carryover)
2. Significant redirection of funds
3. Change in scope
4. Implement a new activity
5. Enter into a subaward not specified in the approved budget
6. Apply for supplemental funds
7. Extension of period of performance
8. Lift a funding restriction

How To Request A Prior Approval

The process to request prior approval may vary by federal awarding agency. Typically it is a formal process that requires supporting documentation and a written justification.

The CDC Prior Approvals for Non-research Awards guidance document has detailed instructions on where prior approval requests should be submitted, by whom, and what the required supporting documents are.

CDC Prior Approvals for Non-research Awards

Office of Financial Resources, Office of Grants Services

CDC anticipates that recipients may need to make post-award changes to their approved budgets, key personnel, or other items during the period of performance in order to accomplish programmatic objectives. U.S. Department of Health and Human Services (HHS) prior approval requirements are documented in [45 CFR Part 75.308](#). Additionally, the Notice of Award (NOA) will outline activities that require prior approval for each recipient.

CDC Prior Approvals for Non-research Awards Guidance Document

Prior Approval Amendment (Application)	GMM Application Kit Requirements	Supporting Documentation for GMMO Review
Budget Revision	<ul style="list-style-type: none"> • Application Upload • SF-424 Application for Federal Assistance Version 2 • SF-424A Budget Information Non-Construction • Project Abstract Summary 	<ul style="list-style-type: none"> • Request details with AOR authorization • Budget Justification that includes CDC Budget Preparation Guidance information • Indirect Cost Rate Agreement (if applicable)
Carryover of Funds	<ul style="list-style-type: none"> • Application Upload • SF-424A Budget Information Non-Construction 	<ul style="list-style-type: none"> • Request details with AOR authorization • Budget Justification that includes CDC Budget Preparation Guidance information • FFR • Indirect Cost Rate Agreement (if applicable)
PI/PD Key Personnel	<ul style="list-style-type: none"> • Change Project Director 	<ul style="list-style-type: none"> • Request details with AOR authorization • Effective date, name, resume and contact information • <i>OPTIONAL</i> Budget Justification that includes CDC Budget Preparation Guidance information
No Cost Extension	<ul style="list-style-type: none"> • Application Upload • SF-424A Budget Information Non-Construction • Project Period Revision 	<ul style="list-style-type: none"> • Request details with AOR authorization • Timeline and expected activities • Budget Justification that includes CDC Budget Preparation Guidance information
Notification of Contractor or Consultant	<ul style="list-style-type: none"> • Application Upload 	<ul style="list-style-type: none"> • Request details with AOR authorization • Budget Justification that includes CDC Budget Preparation Guidance information
Organization Name Change	<ul style="list-style-type: none"> • Application Upload • SF-424 Application for Federal Assistance Version 2 • SF-424A Budget Information Non-Construction • SF-424B Assurances Non-Construction 	<ul style="list-style-type: none"> • Request details with AOR authorization and list of all CDC grants • An authenticated copy of the instrument which effects the name change • Documentation from recipient's legal counsel indicating name change was effected in accordance with laws • A new SF424 for each CDC grant (showing new name and PI/PD)

Carryover vs. No Cost Extensions

Carryover requests are used when unobligated funds remain at the end of a budget period and the grantee wishes to carry forward these funds into the next budget period. There must be a justified programmatic need to use carryover funds and the funds can only be carried over into a new budget period that falls within the project period or period of performance.

A no cost extension (NCE) request extends the project period beyond the original end date with no additional funding. This is allowed when the end of the project is near, there is a programmatic need to continue the work, and there are sufficient funds left to cover the extended effort.

In both cases, carryover and NCE requests can only be requested when there are activities that still need to be completed. A grantee **CANNOT** request a carryover or NCE just to spend down unspent funds.

Request to Carryover Funds

According to the current CDC Prior Approvals for Non-research Awards guidance document, in order to submit a request to carryover funds to another budget period, the grantee should submit the following:

1. Request in GrantSolutions Grants Management Module
2. A completed SF-424A Budget information - Non-Construction Programs
3. Written request from the grantee's Authorized Organizational Representative
4. Budget justification
5. A completed SF-425 - Federal Financial Report (FFR)
6. Grantee's negotiated indirect cost rate agreement (NICRA), if applicable

Request a No Cost Extension

Using the same CDC Prior Approvals for Non-research Awards guidance, in order to request approval of a no cost extension, the grantee should submit the following:

1. A completed SF-424A - Budget Information - Non-Construction Programs
2. Written summary of the requested change by the awardee's Authorized Organizational Representative which should outline the new timeline and what activities will be accomplished during the revised project period. *It is important to note that a no cost extension should be supported by a project-specific reason.*

Expanded Authority

Expanded authority creates efficiency by reducing the time and effort that both the awardee and federal agency officials devote to grant administration.

They are essentially operating authorities provided to some award recipients and they waive prior approval requirements for specific post-award changes or actions.

Expanded authorities are not assumed. It is important that grantees review the award details to see if any have been extended. If not, it is always better to check with the appropriate agency official.



Important! Identify what expanded authority may have been extended to you as a grantee.

Exceptions

2 CFR 200.102, details where OMB may allow for exceptions when not prohibited by statute. Exceptions are granted on a case-by-case basis for individual non-federal entities by a federal agency or the federal awarding agency may adjust requirements to a class of federal awards.

Two recent exceptions granted to recipients of federal financial assistance were published in the 2020 OMB Memos [M-20-11](#) and [M-20-17](#).

These exceptions were put into place to provide flexibility to grant recipients due to the impact of COVID-19, and provided short term relief for administrative, financial management, and audit requirements.

It is always best to follow the requirements outlined in the terms of the award, Uniform Guidance, and agency-specific regulations.

GRANTS MANAGEMENT TOOLBOX

- [CDC Prior Approvals for Non-research Awards](#)
- [CDC Fact Sheet: Recipient Expanded Authority for Carryover Funding](#)
- [OMB Memo M-20-11 – Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus](#)
- [OMB Memo M-20-17 - Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus due to Loss of Operations](#)
- [SF-424-A – Non-Construction Programs](#)

AUDIT REQUIREMENTS

Grantee audit requirements are outlined in 2 CFR 200 Subpart F and in 45 CFR 75 Subpart F (the U.S. Department of Health and Human Services' equivalent of audit requirements).

Audit Requirements

If a federal grantee expends \$750,000 or more of federal grant funds in its fiscal year, it is required to have a single or program-specific audit.

If the federal grantee expends less than \$750,000 in its fiscal year, they are exempt the single or program-specific audit requirement, however records must still be made available for review by the appropriate federal or pass-through entity officials.

It is essential that grantees have written policies and procedures in place that integrate applicable elements of federal requirements and other financial management best practices.

Written Policies and Procedures

Grantees must have written policies and procedures on the following:

1. Financial management and internal controls
2. How it manages federally funded payroll expenses
3. How it ensures costs charged to federal grants are allowable, allocable and reasonable
4. Subrecipient management and monitoring and FFATA reporting, if applicable
5. How the organization manages drawdowns
6. How the organization manages its procurement process.

Supporting Documentation

The auditor must have access to the grantee's relevant personnel, records, and supporting documentation that substantiate expenses charged to the federal grant.

To learn more about the responsibilities of the grantee, 2 CFR 200.508 provides a breakdown of the full responsibilities of a grantee during an audit. For HHS grants, similar information can currently be found at 45 CFR 75.508.

Some of the documents that should be on hand are purchase orders, invoices, and receipts. Grantees should also be able to demonstrate reasonable allocability of costs that were fully or partially covered with the federal grant and that those costs were incurred during the appropriate budget period or

project period. A grantee should also expect an evaluation of the organization's financial management and internal control systems.

Where to Submit Completed Audits (Federal Audit Clearinghouse)

Grantees must submit single audits to the [Federal Audit Clearinghouse](#). The Federal Audit Clearinghouse is where the federal government accesses all grantee audits. It also serves as a public database of audits. Be sure to check the award terms and conditions for any instructions to also submit the audit to the funding agency and the cognizant agency.

GRANTS MANAGEMENT TOOLBOX
<ul style="list-style-type: none">• CDC Understanding Your Reporting – Audit Requirements• Federal Audit Clearinghouse• 2 CFR 200 Subpart F – Audit Requirements• 45 CFR 75 Subpart F – Audit Requirements

CLOSEOUT

One of the final steps in the federal grant management process is the award closeout.

The closeout occurs when the grantee has undertaken all activities outlined in the Notice of Funding Opportunity, the project scope, and the approved budget. The grantee should have also obligated all or nearly all award funds as it approaches the end of the period of performance.

The Terms and Conditions of the Notice of Award has guidance on closeout requirements.

Preparing for the Closeout

An internal plan should be developed for the closeout process. The plan should include close monitoring of the award to ensure compliant spenddown, confirmation of the reporting timeframe and submission process, and all required reports from any subrecipients should be collected.

In addition, if any equipment is to be retained for continued use, the awardee must identify each item and notify the awarding agency. The awarding agency may exercise its rights to require the transfer of equipment or provide disposition instructions.

Final Reports and Documents

As with all other reports during the award, the grantee or recipient should submit all closeout reports. Communication with the project officer and/or grant management specialist to clarify the closeout process is highly beneficial.

Below is a list of reports that should be submitted during the closeout process. Verify this process and list by reviewing the award terms and conditions and by confirming with the federal official.

1. Final program report
2. Final Federal Financial Report (FFR)
3. Tangible Personal Property Report (SF-428)
4. List of publications resulting from the project

Finally, it is recommended that a verification of the receipt of all reports and documentation is requested from the federal official. It is also important to retain all pertinent documents per federal record retention requirements.

GRANTS MANAGEMENT TOOLBOX

- [CDC Closeout](#)
- [CDC Dictionary of Terms](#)
- [CDC Grants Management Module: Grant Closeout Amendment for Grant Recipients, Non-Research Grants](#)
- [Tangible Personal Property Report \(SF-428\)](#)

RECORD RETENTION

Record Retention Requirements

There is a minimum timeframe that grantees should retain documents related to the federal award.

According to 2 CFR 200.334 and 45 CFR 75.361, records must be retained for a period of three years from the date of submission of the final expenditure report and longer in the case of any litigation, claim or audit started before the expiration of the three-year period.

Some federal agencies may recommend a longer record retention period and this requirement is generally included in the grant agreement.

Types of Records to Retain

The types of records awardees should retain include all financial records applicable to the grant. That includes any purchase orders, invoices, receipts, single or program-specific audits, and financial reports.

Awardees should also retain any records that are germane to the award such as any records that substantiate how the awardee met the performance objectives and any supporting data, including: program oversight and monitoring reports, evaluation reports, compliance reviews, performance reports, and related correspondence.

If program income is received after the award's period of performance, the grantee must retain such records for three years after the end of the federal award fiscal year when the program income was earned. For examples, if the grantee concluded an award in 2018, but earns program income in 2020, then it must maintain program income records for three years after the end of 2020.

In addition, if the awardee received an approved negotiated indirect cost rate from the cognizant agency, retain the indirect cost rate proposal and any supporting documentation.

CONSULTING

TRAINING

COMPLIANCE

Grants Works specializes in helping organizations, businesses and municipalities acquire, manage, and comply with government and private sector grants.

Grants Works' recipient-centered training focuses on federal and other government grant management. All training is customized to integrate agency-specific administrative processes while adhering to 2 CFR 200, other federal regulations, and relevant program requirements.

The training is designed to enhance grantees' knowledge of their program management, budgetary oversight, reporting, and compliance responsibilities.



**GRANTS
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