ED GRANTS MANAGEMENT POLICY

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GRANTS MANAGEMENT POLICY DICISION

Agenda

Now

Later

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- Please introduce yourself in the chat with:
  - Your name
  - Your state
  - Your years of grant experience

Grants Management Policy Division

Grant Policy Analysts who support grantmaking offices and provide resources for the grantee community

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It's great to know who's in your community, who you can lean on if you need it, who you can ask questions, who's in your area and might be facing similar challenges.

The grants management policy division, we are a group of policy analysts who support grant making offices. Like the folks who work with you around Javits, we provide resources to the grantee community as well. Our goal here is really to support you in all you need to know to kind of effectively manage your grant so when laws are passed, new policies are instituted that pertain to grants.

Resources

Grantmaking at ED

Computer Trainings

Grant Award Notification (GAN)

Recorded Briefings

G5 Online Help

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I wanted to take a minute to highlight these so that you know you have lots of places to go to get questions answered to have support around managing this federal award so the first one here is Grant making at ED (the U.S. Department of Education). So this is a document that's written for external folks who are interested in learning more about grant awards as new grantees. If you're on the lower end of that experience spectrum, this will give you a great perspective on all of the things you can expect over the course of your award. It gives you information about things like indirect costs if you have questions about that, who to talk to, it will talk to you about closeout and things that are coming down the pike that we will chat a little bit about today. So this gives you kind of a total, you know start to finish perspective of having a grant award.

The second resource is our computer trainings. So on Ed.gov, there's an entire suite of totally free computer trainings that you can take. They talk about things like cash management, subrecipient, monitoring, all kinds of things. It's really designed to be a one stop shop for folks who are managing federal awards grants here at the Department. We keep adding to that curriculum, so take them, but make sure you stop back in, see what's being added as new laws are passed. We put up new content to make sure that folks are staying educated as things change so hope that those are going to be helpful for you.

I do want to talk about leveraging your GAN as a tool. It has all of the laws that govern your award. All of the policy issues that are specific to your awards, and it goes over so much information about what regulations to visit, what you need to understand about managing that award. So I do hope you will read it as a resource. So it's a little bit of a contract, it's that too, but a contracts are important, right? They tell us what we're responsible to do.

Our team also posts recorded briefings and, as things again change, we had a briefing up about COVID flexibility. We do briefings about new laws that are being implemented so please do be on the lookout for those. You can access the link here to a website called Edge stream. Edge Stream is an external facing video platform.

I also want to talk about the G5 online help. I think this is an incredibly underutilized tool in this environment. If you are new to using G5, it can be unwieldy. It can feel really big. Also, it is a challenge because what you see in the G5 system is very different from what we see so we're not always the best folks to help you. The Help Desk is phenomenal. You can also print out the steps.

There's a lot of information contained in those resources and if you need any help navigating them, that's what your program contacts are here to support you through, but a lot of those places you can go to for yourselves.

HERE AND NOW

- **PERFORMANCE MANAGEMENT**
- **FINANCIAL MANAGEMENT**
- **INTERNAL CONTROLS**
- **RECORD RETENTION**
- **STAYING CURRENT**

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We're going to talk about the here and now and what things are you're going to be keeping on top of. We're going to talk about performance management, which is how well your grants are performing; financial management, your stewardship around those Federal funds. We're going to talk about internal controls, and we're going to talk about record retention, why it's important. We're going to talk about staying current and the value of doing that.

Performance Management

Impact

- Objectives
- Performance Measures
- Program Goals

Substantial Progress

- Performance Reporting

Reports to Congress
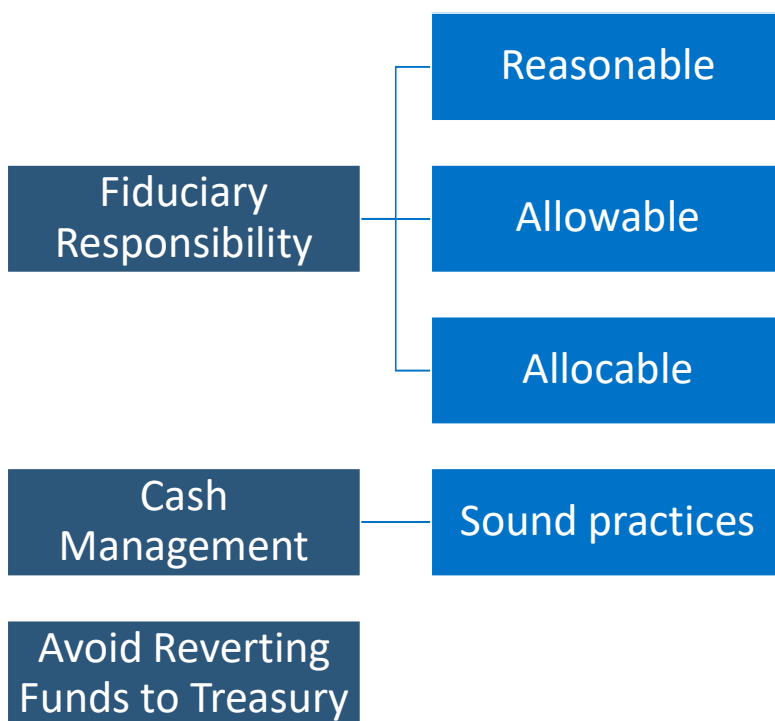
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We're going to talk about managing performance. So really what we are talking about here is measuring your project's impact and we use few different factors to do that. We monitor how you are meeting objectives, how you're progressing towards your objectives. We use performance measures, and we use program goals; what is this program designed to do? And then we use the information we get from you to assess how well your meeting those goals.

One of the terms that you're going hear is substantial progress. That's how we measure how well your award is performing and ensuring that we're in a position that you are making enough progress for continued funding and we make those determinations based on the performance reports that you submit. Those are incredibly important. They tell us how you're doing and ensure that you are working towards positive outcomes from your work.

One of the reasons all of this information is so important is everyone reports to someone. We, as an agency, report to Congress. So it's really important for us to have a clear picture of how well you're doing and the great services that you're providing so that Congress also has a clear picture of the fact that our programs are doing what they're designed to do.

Financial Management

Fiduciary Responsibility
- Reasonable
- Allowable
- Allocable

Cash Management
- Sound practices

Avoid Reverting Funds to Treasury

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As you know, managing performance, it's incredibly important to manage our money. So for grants, we're always talking about tax dollars and tax dollars. You know, equate directly to a responsibility for stewardship. It is all of our jobs to be a good steward of taxpayer dollars and we do that in a number of ways. We have to keep our fiduciary responsibility in mind. We have to remember what's most important about managing federal funds and, as it pertains to grants, there are three words that you're going to hear about federal spending.

So the first is making sure that all of our costs are reasonable. What would a prudent person do? That's the question. If we ever feel like we don't know what's reasonable, would you want it on the front page of the paper with, you know, Joe taxpayer? Understanding how you're spending this money. That's the level of responsibility we want to bring. How reasonable we want that to feel.

Of course, an important question is, is an expense allowable? Is it something that we are legally allowed to spend our money on based on our regulations, based on our policy, based on any number of guiding documents (and we'll talk a little more about those guiding documents) and then is it allocable? Eligibility is really just a question of being able to assign an expense to an outcome. Great example is our staffing. You know, if we have someone who's 50% on the grant, then we should see directly that the 50% of the salary we pay directly relates to the work that they do on that particular award. If they're split across two awards, again, that other 50% will be directly related to the work they do for a different award.

All of this adds up to sound cash management. That's really our goal here is making sure that we are keeping diligent records around how we're spending our funds, around our policies around spending, the laws that we follow here, also the policies that your organizations follow so that we can keep track of the fact that we are using that good sound judgment when we're making financial decisions and our goal is to make sure that we are spending our funds responsibly so that they don't end up reverting to the U.S. Department of Treasury. If we aren't able to spend the funds, they go back (to Treasury) and essentially say we didn't need them. We know how important the work is that you do. Of course you need them. We just need to make sure that you're sending them in a way that shows good stewardship.

U.S. Department of Education Office of Career, Technical, and Adult Education

§200.303 Internal Controls

- **Reasonable assurance** that the award is managed in accordance with Federal requirements

- These objectives can be broadly classified into the following three categories:
  - Operations
  - Reporting
  - Compliance

All right, so now we're going talk about internal controls. Performance management, financial management -- those things are pretty obvious to connect to the outcomes, but internal controls can be a little bit tricky. But internal controls are the assurance that you make that you are managing your grants in accordance with federal requirements. That's incredibly important because your internal controls really are how your entity functions and if your entity is not functioning well, if you're not healthy, kind of internally, it's incredibly difficult to have that great performance and be able to track that and to be a good steward of those funds because our balls drop, right? We're juggling different balls and we don't want them to fall.

Over emphasize the importance of communication inside of your organization because when we're talking about things like operations, financial management, reporting, retention and ultimately your entities compliance with federal law, those things are going to require a lot of different people at your organization to a have a common goal and be working towards it in a way that is supportive of each other and is not going to hinder anyone's progress or create any kind of difficulty.

Financial management is something that a project director works on, but also needs a finance office. A lot of you are from institutions of higher education, right? Your finance office might manage your drawdowns. They might be the folks who do a lot of the day-to-day work around your budget, but you have to be informed. You're sharing your expenses and the things that you need to be successful. So how you communicate inside of your own organization is going to be a big, huge part of your internal controls.

§200.344 Record Retention

If it isn't documented, it didn't happen!

Codify Procedures
- Performance
- Financial
- Internal Controls

Data quality
- Accurate
- Complete

Retention Period
- 3 years after final report submission

So we're going talk about record retention. I tell everybody it's boring, but it's incredibly important with government. If it isn't documented, it didn't happen and your records are how you substantiate all of the great work that you've done. That's for you. That's also for us. We have an important sort of record keeping responsibility here, but the citation on the screen 200, three, 44, that is the citation from the Uniform Guidance to CFR 200. So that will give you all of the details you need.

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File Touchpoints

- Programmatic and financial records for should be:

- Clear, concise, and detailed
- Consistent with institutional policy
- Meet federal requirements
- Revised within scope of project
- Achieve project goals

First is, I want to talk about data quality. We need your records to be accurate and complete. Your records tell the story of what you are, what you've done right. If you're telling an incomplete story or an inaccurate story, then the information we have, the view we have of how your project is functioning, and then ultimately the view that we pass on to Congress is not going to be as complete. It's not going to be effective and it does not demonstrate the great work that you're doing.

Other important elements for your records, we talked about those internal controls. One of the things we need to see are your fully codified procedures. We need to know how your entity functions. Because we have a lot of regulations, we have a lot of laws that govern what you do. But in the gaps, because they're going to exist, because we can't be totally prescriptive as a government right, we have to give you the space to function in the ways that you need to. But what we do need from you is to show us, where in that space, how you're managing those things, so in places where there isn't a specific law, your institutional policies and procedures are what govern your work and we need to see a record of what those are. We need to be able to substantiate any questions that might arise about how you function as an organization. Also, we do have a federal requirement for a record retention period of three years after you submit your final report, three years after the end of your award. So please just make sure that you're taking that in mind and that your organization has a way to manage that requirement.

Our files are really all the things that we do that's programmatic, that's financial. Again, those internal controls even and you want your records to do a few things. You want them to be pretty clear, pretty detailed, but you do want them to be concise. You want someone to be able to walk in, pick up your files and understand what you did, how you did it, all those kinds of things, who you're serving, the great work you do, you also want them to be consistent with your institutional policy. That's incredibly important.

A grant is supposed to fit into the work that you do as an organization not drive it, change it, you know, steamroll it at all. We need to make sure that you're demonstrating how you're meeting your federal requirements. Incredibly important, and we also need to know that when you're making any changes or revisions, those things are going to be within the scope of your project. We're really just asking you to demonstrate how you are working towards achieving your project's goals. Things that you'll be keeping overall, you know who you're serving, what services you're providing, timelines you know, any objectives that you have, you'll be measuring your progress towards those. What else for financial management? You'll be keeping track of things like your payroll, right? You're going to keep track of expenditures, you're going to have a system where an auditor can see what you've spent. Should your program contact need information about your spending, you can provide documentation for them with the right receipts and then gaze at that time and effort for personnel in case audited.

Staying Current

New Laws

New
Institutional
Procedures

Updated
Regulations

New ED
Policy

Executive
Orders
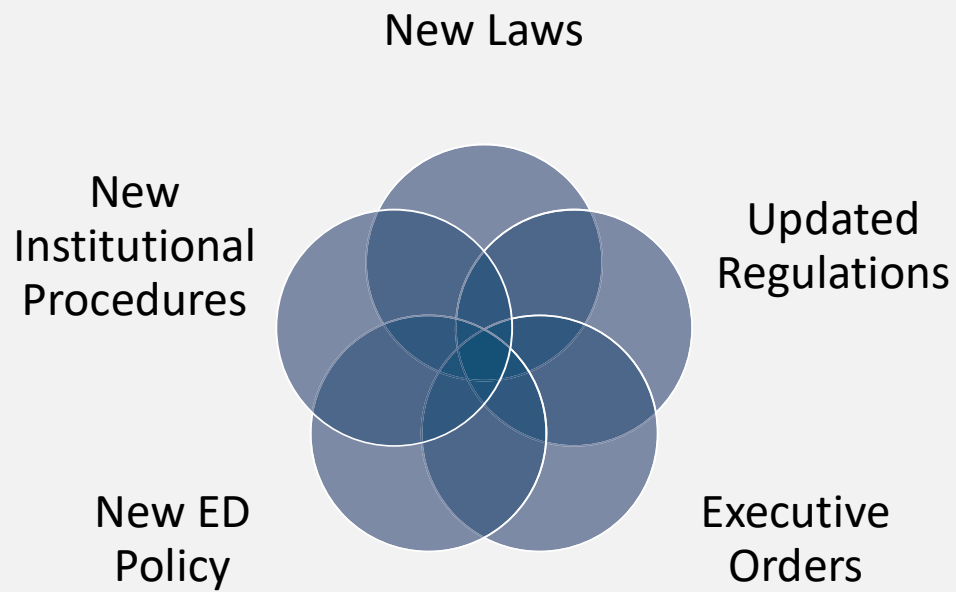
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Staying current is an incredibly important part of what you're going to be required to do over the life of your grant and these are things that are going to come all the time -- new laws get passed. We're going to update our regulations for those of you who've worked with grants for some years. You might remember that back in 2020, the Uniform Guidance 2 CFR 200 had a major update. Citations changed; there's a lot to unpack in that. When there are changes of that scope, like that scale, there are new Executive Orders, then the Department has the new policies that it puts in place (afterwards). Your institutions will grow, change right, and you'll have new institutional processes and procedures that you will have to keep up with so it's a very busy little Venn diagram because I want to show how these things all overlap and that you are kind of in the middle --the focal point of all of these different kinds of changes. The goal of all of these things really is to support you, help you. Support the work you do.

Now it can seem kind of daunting. But that's why, at least at this Department our goal is always to support you in making sure that you have a clear understanding of those things when the laws change. We try to make sure to talk you through those things when new things come down the pike that will affect you -- new laws, executive orders that introduce new policies. We try to make sure you're informed about those things. We just want you to know you're not alone in any of this, but it is important to keep up with all of these things that might change around you and the work you do.

Hierarchy of Authorities

Laws and Regulations

Executive Orders and Regulations

ED Policies

Guidance

LOOKING TO THE FUTURE

- **UNIQUE ENTITY IDENTIFIER (UEI) RENEWALS**
- **CLOSEOUT**

UEI Renewals

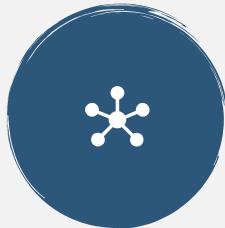UEI Renewals are an annual requirement
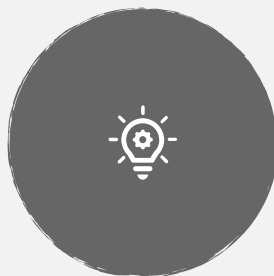
Inactive UEIs will prevent funding

Grantee entity is responsible for closeout

Closeout activities are an allowable cost

Plan for changing roles

Remember final reporting requirements

Closeout

QUESTIONS

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THANK YOU!

BEST WISHES ADMINISTERING YOUR ED GRANTS!