FEDERAL GRANTS MANAGEMENT
“Understanding & Managing Your HRSA Grant”

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POST AWARD ISSUES
Post Award Issues

Grantee must notify HRSA of any changes that may significantly impact the project or materially impair the ability to meet program objective.

Prior Approval
- Change in the scope or budget costs
- Major changes that were never discussed in the approved budget
- Change in project director/other key personnel
- Absence of project director for more than 3 months or a 25% reduction in time devoted.
Post Award Issues

Prior Approval

Carryover of unobligated funds into the subsequent funding period = *Should always include:*

- a line item budget, budget narrative and justification.
- a details as to how the carryover will be used to complete the goals and objectives of the program.
- not be sought for the reason of spending down of awarded funds.
- not always guaranteed.
Post Award Issues

Prior Approval

- Budget Revisions in excess of 25% or $250,000 USD – whichever is less

- Cost or No Cost Extensions
REPORTING REQUIREMENTS
Reporting Requirements

Form SF425 Federal Financial Report

Due Dates have been aligned with the Payment Management System quarterly report due dates, and will be due 90, 120, or 150 days after the budget period end date.
Reporting Requirements

Form 425 - Federal Financial Report

Please refer to the chart below for the specific due date for your FFR:

- Budget Period ends August – October: FFR due January 30
- Budget Period ends November – January: FFR due April 30
- Budget Period ends February – April: FFR due July 30
- Budget Period ends May – July: FFR due October 30
Audit Requirements

Annual Audit (OMB Circular A-133)
- If Federal expenditures are greater than $500,000 (Also Check for the compliance supplement for health centers)

- Due 9 months after the end of the fiscal year or 30 days after receipt from the auditor, whichever is earlier

- Preferably, the audit will result in an unqualified opinion, gross charges exceed billable expenses, acceptable financial ratios, and minimal (or no) material audit findings
DHHS
Administrative Regulations and Requirements
Transactions/activities conducted by colleges, universities, and nonprofit grantees (including health centers) that are paid for in whole or in part by Federal funds are subject to administrative requirements in 45 CFR Part 74, incorporating –

- OMB Circular A-110 – Administrative standards
- OMB Circular A-21 – Cost principles
DHHS Administrative Regulations and Requirements

45 CFR Part 74: Requirements include –

- Property and equipment standards
- Record-keeping and reporting requirements
DHHS Administrative Regulations and Requirements

Property and Equipment Standards

- The grantee may not encumber, share, put to a different use or dispose of such property/equipment without HRSA approval

- Continued use for Federally-sponsored project as long as it is needed
DHHS Administrative Regulations and Requirements

Property and Equipment Standards: Use and Disposition

- Use HRSA disposition or transfer instructions if real property/equipment is no longer needed
- Grantee must compensate government for “Federal share” if retaining title or sells real property/equipment
DHHS Administrative Regulations and Requirements

Use and Disposition (cont.)

Equipment

If no longer needed for original Federally-sponsored project, may use in another Federally sponsored project or retain title for other uses without HRSA approval
Grantee may secure a copyright in materials created with grant support, but the Federal government retains the right to reproduce and publish (and to allow third parties to do so).
Grant Closeout

Process that takes place after expiration or termination of grant project period (PP)

General Requirements

- Submitting Required Final Reports within 90 days after PP End Date
- Closeout Process is initiate when approaching 270 days after PP End Date
Grant Closeout

Exceptions

- Existing pending decision in HHS Appeal
- Existing unresolved monetary findings from audit
- Existing open legal action
Grant Closeout

Procedures - Determine grantee’s compliance

- Compliant
- Non-Compliant
- Responsive
- Non-responsive
Grant Closeout

- Procedures – Determine the $$ amount
  - FFR should reconcile to PMS
  - Review all relevant financial data

- Procedures – Determine the appropriate enforcement actions

- Procedures – Inform the recipient
DHHS Administrative Regulations and Requirements

Record-keeping and Reporting Requirements

- Grantees are responsible for monitoring and oversight of all activities supported (in whole or in part) by Federal funds.
- Must submit to DHHS financial and programmatic reports pertaining (directly or indirectly) to the grant-supported project, in such form and the frequency as prescribed by DHHS.
DHHS Administrative Regulations and Requirements

Record-keeping and Reporting Requirements: Retention Period (3 Yrs)

- Financial records, supporting documents, statistical records and all other records pertaining to the grant-supported.

- If an audit, litigation, or other action involving the records is started before the end of the appropriate retention period, the records should be maintained until the end of the appropriate retention period or until the audit, litigation, or other action is completed, whichever is later.
DHHS Administrative Regulations and Requirements

Record-keeping and Reporting Requirements: Access

For as long as records are retained, DHHS, the Comptroller General, or any of their duly authorized representatives has the right unrestricted access.
Helpful Websites

To access PMS forms:
http://www.psc.gov/forms

HHS grants policy statement

45 CFR 74
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=85fa827d5b4cde0a8286b0541125d28e;rgn=div5;view=text;node=45%3A1.0.1.1.35;idno=45;cc=ecfr

OMB Circulars at
http://www.whitehouse.gov/omb/circulars