

Things to consider when developing Grants Management Procedures

General

Procedures should be detailed enough so that someone new to your organization could successfully administer the grants. Review Appendix A-1 of the DHSES contract, Certified Assurances and applicable federal regulations. Determine what additional steps/processes need to be added to your organization's existing policy and procedures to ensure compliance and document them. Whenever possible, avoid using specific names in your procedures. State the position or department, not the person's name, responsible for the task. This will reduce the need to update procedures as a result of turnover.

1. Do your procedures include steps for compiling State Aid Vouchers/Detailed Itemization forms to submit to the State for reimbursement?
 - a. How does your organization determine what expenditures to include for reimbursement?
 - b. Are there internal financial reports that are utilized? What are the names of the reports? How do you obtain the reports?
 - c. Do the grants support any positions? If so, how do you determine payroll expenditures to include for reimbursement? Is there a payroll report that you utilize? How do you obtain the report?
 - d. What position is responsible for compiling the vouchers?
 - e. Include any levels of review throughout this process.
 - f. Who signs the vouchers once they are completed? Keep generic and list the position and not the individual's name.
 - g. What position or department is responsible for submitted the completed vouchers to the State?
 - h. Where are the documentation maintained that were used to compile the voucher submission? Are copies of the vouchers retained in hard copy or electronically? Where are they stored?
 - i. Consider including sample/blank State Aid Voucher/Detailed Itemization forms
2. Do your procedures include steps for compiling quarterly progress reports
 - a. How does your organization determine what to include in the report?
 - b. What unit/position is responsible for compiling and submitting the report?
 - c. What position is responsible for reviewing and signing off on the progress reports?
 - d. Consider including a sample progress report in your procedures.

3. When your organization receives a grant award, are there any steps/processes that must be taking to accept the award? What are those steps and who (department/position) is responsible for ensuring the steps are completed?
4. Accounting for grant expenditures
 - a. When your organization receives multiple grants, do procedures exist to avoid the co-mingling of funds?
 - b. Be sure that if your organization receives funding from two or more sources, all necessary steps must be taken to ensure that grant-related transactions are not commingled. This includes, but is not limited to, the establishment of unique budget codes, a separate cost center, or a separate chart of accounts.
5. Do your procedures include the process for determining when and how to amend/modify a contract
 - a. How do you determine when a budget amendment or contract amendment is needed?
 - b. List the specific reports or departments/staff that are involved in this process. Include whether meetings are held, the frequency and who is involved. Whenever possible, document positions and not specific names. This will help to eliminate the need to update the procedures due to staff turnover.
6. Procurement
 - a. Are there any special instructions for procuring items when using grant funding?
 - b. Sole Source/Single Source procurements require prior approval from DHSES. Document the steps your organization has in place to comply with this requirement.
7. Property Records
 - a. Do your procedures include the steps necessary to ensure that inventory procedures include the tracking of the following information, by award:
 - i. Description of the property
 - ii. Serial Number or other identification number
 - iii. The source of the property
 - iv. Who holds title
 - v. The acquisition date
 - vi. Cost of property
 - vii. Percentage of federal participation in the cost of the property
 - viii. Location of equipment
 - ix. Use and condition of the property
 - x. Any ultimate disposition data including the date of disposal and sale price of the property

- b. Are there special procedures/steps in place to ensure proper receiving of grant purchased items and that inventory records are updated according to the contract requirements?
 - c. Are procedures documented to ensure an inventory is conducted at least once every two years?
- 8. Payroll
 - Do existing organizational procedures ensure compliance with 2 CFR Part 225 (formerly OMB Circular A-87) for compensation of personal services? If not, implement and document additional procedures/steps to ensure compliance.
 - a. Do the documented procedures cover authorizing and processing overtime/backfill?
- 9. Consider including a resource page
 - a. Websites/links where State/Federal forms/instructions/guidance can be obtained. This can include internal and external resources.
 - b. A list of regulations commonly applicable to United States Department of Homeland Security (DHS) grants are listed below, including the guidance:
 - i. Administrative Requirements:
 - 1. 44 CFR Part 13, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments
 - 2. 2 CFR Part 215, Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (OMB Circular A-110)
 - ii. Cost Principles:
 - 1. 2 CFR Part 225, State and Local Governments (OMB Circular A-87)
 - 2. 2 CFR Part 220, Educational Institutions (OMB Circular A-21)
 - 3. 2 CFR Part 230, Non-Profit Organizations (OMB Circular A-122)
 - 4. Federal Acquisition Regulation Sub-part 31.2, Contracts with Commercial Organizations
 - iii. Audit Requirements:
 - 1. OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations