Understanding and Managing Your Award

HRSA Healthy Grants Workshop

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Office of Federal Assistance Management
Agenda

• Project Officer (PO) and Grants Management Specialist (GMS) responsibilities
• Terms, Conditions, and Reporting Requirements
• Accurate and Timely Submissions
• Prior Approval Requests (PA/PAR)
Project Officer Roles and Responsibilities

- Primary contact for grant recipient on programmatic aspects
- Monitors scientific, technical, programmatic progress and performance of awardee
- Conducts site visits
- Ensure proper documentation of deliverables to ensure success of the project
- Reviews and makes recommendations on continued federal support
Grants Management Specialist Roles and Responsibilities

• Primary contact for budgetary aspects of award
• Explains regulations, policies, and financial aspects of your award
• Reviews and makes recommendations on continued federal support
• Award Requirements and Cost Principle requirements
• Oversees receipt of all required reports
• Makes site visits as needed
Terms and Conditions

Grant Terms and Conditions:

- Legal requirements that the recipient must meet according to statute, regulation, or policy.
- Conditions specified in the Notice of Award (NoA) require a response from the recipient which is submitted through the EHBs and reviewed by the PO and GMS.

The grantee indicates acceptance of the award and all terms and conditions of the award by drawing down funds from the Payment Management System (PMS).
## Compliance Requirements at a Glance

<table>
<thead>
<tr>
<th>Entity Type</th>
<th>Circulars</th>
<th>Grants-wide</th>
<th>HHS Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education Institutions</td>
<td>OMB A-21</td>
<td>2 CFR 220</td>
<td>45 CFR 74.27</td>
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<tr>
<td>State and Local Governments</td>
<td>OMB A-87</td>
<td>2 CFR 225</td>
<td>45 CFR 92.22</td>
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<td>Non-Profits</td>
<td>OMB A-122</td>
<td>2 CFR 230</td>
<td>45 CFR 74.27</td>
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Reporting Requirements

• Progress Reports
• Federal Financial Reports
• Other Submissions
  o SF-428 Tangible Property Report
  o Conditions
### Reporting Requirements (Continued)

<table>
<thead>
<tr>
<th>Report Type</th>
<th>Requirements</th>
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<tbody>
<tr>
<td>Non-Competing Continuation Progress Report (NCC)</td>
<td>• Annually for programs that are renewed on an annual basis</td>
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<tr>
<td>Annual Performance Report (APR)</td>
<td>• Due date varies according to program</td>
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<tr>
<td>Federal Financial Report (FFR)</td>
<td>• Every 12 months</td>
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<td>Final Performance Report</td>
<td>• End of Project Period</td>
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<td>• Within 90 days of grant closure</td>
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Prior Approvals
Prior Approval Overview

• Prior Approval Meaning
• Prior Approval Types
• Expanded Authority
• When they are required
What is a Prior Approval Request?

• A recipient needs to change certain aspects of the approved application after the award is issued
• Requires submission in Electronic Handbooks (EHBs) Prior Approval (PA) Module
• Requires a 30-day response from HRSA
• Recipients may not move forward until HRSA approval is received, either via Notice of Award (NoA) or an EHB email notification
Common Prior Approval Request Types

- Change in Key Personnel (Project Director)
- Rebudgeting
- Change in Scope
- Carryover of Unobligated Balance
- Extension with /without Funds (No-cost Extension)
- Property Disposition
- Organizational Name Change or Address change
- Change of Recipient
- Relinquishment
Expanded Authority

• Waive certain prior approval requirements for some actions

• Carryovers
  o Carry over up to 25% of the total award amount of the budget period from which you will transfer the unobligated funds into the consecutive budget period for allowable costs within the original scope of the project.

• Extension without Funds or No Cost Extension (NCE)
  o A one-time, no-cost extension of the budget and project period end date up to 12 months.
Change in Key Personnel

• Defined in 45 CFR Part 75
  o The individual(s) designated by the recipient to direct the project or program being supported by the grant.
• Must provide a resume or Curriculum Vitae (CV) so HRSA staff can verify the person is qualified for the position
• Provide justification, reasoning, and effective date of the change
• Consider if the change will have any budget implications
Carryover of Unobligated Balance

• Request to use unobligated balance in a subsequent budget period
• Recommended to be submitted no later than 30 days after the acceptance of the Federal Financial Report
What to Include in Your Carryover Request

Recipients should provide the following in EHB:

• Identify the funding to be carried forward and how those funds will be utilized in the current budget period
• Explain why the unobligated balance exists
• Indicate how the unobligated funds will be used to complete approved goals and objectives
• Provide a budget and budget justification narrative for the amount requested from the available unobligated balance in whole dollars only
Extension Without Funds (No-cost Extension)

- Request for more time to complete a project, not to exceed 12 months
- Sole purpose cannot be to spend unobligated balance of funds
- The NCE must be requested for the purpose of finishing the project and there must have funds available to do so. (45 CFR 75.308d(2))
Other Prior Approval Requests

Rebudgeting

• Significant Re-budgeting -- cumulative changes over 25% of the originally-approved budget
• Category re-budgeting
• Purchase of real/tangible property, including equipment

Change in Scope of Work

• Any major change to the originally-approved scope of work
Other Prior Approval Requests (Continued)

Property Disposition
- Approval to transfer or sell equipment or transfer, sell, or mortgage real property
- See 45 CFR Parts 75.318-75.321

Organizational Name Change
- Submit under Other, then Name Change
- Make sure you update in SAM.gov too!

Change in Recipient
- Successor-in-Interest: Two organizations merge or one organization takes over another by assuming all assets and liabilities

Relinquishment
- Recipient decides it is unable or unwilling to carry out the approved project and has chosen to give up the award
- Full award or part of an award
Tips for Success

Benefits of having a good financial management system:

• Avoid findings for unallowable costs

• Maintain effective control over and accountability for all assets
  o Adequately safeguard those assets
  o Ensure that they are used only for authorized purposes

• Ability to compare actual expenditures or outlays with the approved budget for the award

• Ensure your costs meet Federal cost principles, program regulations, and other requirements as cited in the NoA
Questions?

Q&A
Resources

- **45 CFR Part 75**
  https://ecfr.io/Title-45/Part-75

- **Uniform Guidance (2 CFR 200)**

- **HHS Grants Policy Statement**

- **HRSA EHBs Help**
  https://help.hrsa.gov/display/public/EHBSKBFG/Index

- **Prior Approval FAQs**
  https://help.hrsa.gov/display/public/EHBSKBFG/Prior+Approval+Requests+FAQs
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