

Post Award Grant Management

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Post Award Grants Handbook

This handbook is designed to provide you with college, state, and federal resources you need to carry out your role as a program director (PD) or principal investigator (PI). It is designed to be concise and provides you with hyperlinks to various resources.

The Initial Post Award Grant Process

Successfully managing a grant-funded project requires a great deal of information and careful attention to detail. As a project director (PD) or principal investigator (PI) you, and your team, must familiarize yourself with the policies, practices, and regulations of the funding agency, grant program, and PCC. When a grant agreement is signed by the PCC authorized official representative it signifies that the college has agreed to the terms and conditions of the grant. The grant agreement is a legal document that needs to be adhered to. Grant management is a commitment to ensuring that the project goals and activities outlined in the terms and conditions of the grant contract are implemented on time and within budget.

Throughout the duration of the grant the PD or PI, the Grants Office staff, the Contract and Grant Accounting staff, and the Procurement and Contract staff are responsible for various aspects of the project management and fiscal requirements. The PCC Post Award Grant Officer is available to provide grant management assistance and support for the implementation of the grant funded project. This assistance may include helping PDs and/or PIs solve problems, interpret program and/or funding guidelines and regulations, align the work with other college grants and/or initiatives, offer advice on interacting with the funding agency, and review reports and provide feedback. The Grants Office requires electronic copies of all of your approved grant documents, reports, and any contract revisions.

Post Award Timeline and Action Items

This list of action items are the same duties outlined in the <u>PD/PI Checklist</u>.

- 1. Receive the grant notification and route it to PCC leadership and partners, including the Grants Office and the Contracts and Grants Accounting Office.
- 2. Develop and execute a contract(s), as needed, based on the goals and objectives of the grant.
- 3. Attend a post award grant orientation.
- 4. Work with your Contract and Grant Accountant to develop accounting processes.
- 5. Participate in post award grant opportunities, such as communities of practice and other trainings, as applicable.
- 6. Reach out to the Post Award Grant Officer, and/or other colleagues for support with grant implementation.
- 7. Ensure that you are following all federal, state, and PCC policies.
- 8. Prepare your program and budget reports and send them to the Grants Office and CGA.

- → If you would like feedback and/or support in preparing these reports from the Grants Office or CGA please submit them 1 week prior to the deadline.
- 9. Submit your program and budget reports as indicated in the grant award notification, grant agreement, or the intergovernmental agreement.
- 10. Expend the funds allocated in this grant as closely as you can (knowing that extenuating circumstances may arise).
- 11. Develop and submit a no cost extension (NCE) when needed and allowed by your funder.
- 12. Participate in a grant closeout meeting carried out by the CGA office, in partnership with the Post Award Grant Officer.

Finalizing the Grant Contract

The PCC Contracting Manager, who works in the <u>Procurement and Contract Services Department</u>, plays a pivotal role in supporting PDs/PIs in the post award contracting process. This manager typically works with the program team, the contracts and grants accounting manager, and the risk manager to develop and/or refine the grant contract and/or subcontract. The Contracting Manager works with the Procurement and Contracting Director to get these contracts signed.

Types of Contracts

- Memorandum of Agreement
- Intergovernmental Agreement (IGA)
- Contracts/ Subcontracts

Contract and Grant Accounting

Your grant has a Contract and Grant Accountant (CGA) assigned to your grant to support you with a variety of grant requirements, such as interpreting budget allowances and restrictions, working with you on developing invoicing processes, reviewing your financial reports, and guiding you on time and effort reporting. The Contract and Accounting Department developed a handbook to answer many of your contract and grant accounting questions.

Evaluation and Reporting

The <u>Institutional Effectiveness</u> (IE) Office can provide data, identified in the grant application, to help inform data-driven decisions and support state and federal grant reporting requirements. If you are working with the IE Office, make sure to give them plenty of time to gather data requirements as they support many departments and programs across PCC.

Most grants also require regular programmatic and/or performance reports that describe how the project is being implemented, and fiscal reports that describe how the funds are being spent. These reports are often required on a quarterly, semi-annual and/or annual basis. The grant award notification (GAN) typically outlines the timelines for these reports and may provide templates for the PD/PI to use as guidance. It is the responsibility of the PD/PI to complete these reports in a timely manner. If a signature from the PCC Authorized Official Representative is required please allow enough time for this process.

If the funder doesn't provide a template the Post Award Grant Officer can develop a template and provide support in developing these reports. The PD/PI needs to submit these grant and fiscal reports to the Grants Office and Contracts and Grant Accounting respectively, as well as the funder.

If reports are delayed it may jeopardize the current or future funding from this funder.

Grant Project Staff

Project Director Duties

- 1. Hire key personnel.
- 2. Ensure that you are clear about the project objective/goals. outcomes/milestones, reporting requirements, and timelines and how they are going to be achieved.
- 3. Monitor all grant requirements.
- 4. Provide fiscal management of the project.
- 5. Review and familiarize yourself with the state and federal policies outlined in the <u>Compliance</u> <u>Checklist</u>.
- 6. Read and sign the roles and responsibilities of the grant project director highlighted in the PCC Grant Project Director Commitment Letter.

Project Coordinators and/or Administrative Staff Duties

It is also very helpful, and often necessary, to have a support staff person on the grant team that can:

- 1. Extract student data from Banner for reports, scholarship verification, and other grant processes.
- 2. Assist with creating documents, forms, and flyers.
- 3. Organize electronic files and scan paper files.
- 4. Assist in communicating with grant stakeholders.
- 5. Set up team meetings, reserve meeting spaces, and schedule other appointments.
- 6. Assist with keeping track of the budget(s) and run budget reports, as needed.
- 7. Purchase supplies and materials for the grant (project directors may choose to add the grant fund number to their P Card).
- 8. Process <u>travel-related</u> paperwork for PCC and make travel arrangements.

- 9. Assist with human resources paperwork to set up grant-funded positions.
- 10. Set up purchase orders and process vendor invoices for external contractors or vendors.
- 11. Submit invoices regularly.

Monitoring and Managing Grants

PCC Policies and Procedures

As a PD/PI you will need to familiarize yourself with PCC, state, and federal policies and procedures that relate to the implementation of your grant. Many of these resources can be found on PCC's internet and/or intranet. Make sure you are familiar with these policies and that your grant is following them.

- PCC Conflict of Interest and Ethics
- PCC Family Educational Rights and Policy Act, FERPA
- PCC Nondiscrimination and Non-harassment
- PCC Student Support and Tuition Exemptions (Participant Support)

State Funders

The most common state funders for our grants at PCC include:

- Department of Human Services (DHS)
- Higher Education Coordinating Commission (HECC)
- Oregon Health Authority (OHA)
- Work Systems Inc.
- WorkSource Oregon

Each of these state agencies will provide guidance, policies, procedures and regulations based on their funding stream.

Federal Funders, Guidelines and Regulations

In addition to the PCC policies and procedures, there are federal rules and regulations that you will need to follow as well. These include the Code of Federal Regulations (CFR), which is

"the official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government."

Many federal and state funding agencies award PCC with grants and contracts. Each of these funders require adherence to federal and/or state regulations. Resources from several of the common federal funders and their post-award requirements are listed here.

• <u>29 CFR part 95 – US Dept of Labor (DOL)</u> (for post-award requirements refer to subpart C)

- <u>20 CFR part 667.20 (WIA)</u> (for post-award requirements refer to subpart B-D)
- National Science Foundation (NSF) (for post-award requirements refer to Part II,
- Chapters VI-VIII)
- <u>Title 2 Uniform Guidance for Grants and Agreements</u> (for post-award refer to subpart D)
- <u>US Dept of Education (EDGAR)</u> (for post-award refer to subpart E)
- <u>US Dept of Health & Human Services (DHHS)</u> (Policies and Regulations)
- <u>US Dept of Health and Human Services (DHHS)</u> (Grant workflow process)
- Health Resources and Services Administration (HRSA) (Managing your grant)
- National Institutes of Health (NIH) (Post-Award Grant Monitoring)
- Substance Abuse and Mental Health Administration (SAMHSA) (Grant Management)

Education Department General Administrative Regulations (EDGAR)

For grants funded by the Department of Education <u>Title 34</u> addresses civil rights; special education and rehabilitation services: career, technical and adult education; bilingual education and minority affairs; post-secondary education. You can find more details about the guidance and regulations of the <u>EDGAR here</u>.

Compliance

Uniform Guidance

The Office of Management and Budget (OMB) partnered with the Council on Financial Assistance Reform (COFAR) in 2013 to:

"revise and streamline guidance to develop the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)".

The focus of the <u>Uniform Guidance</u> is to ensure that federal grants and agreements are being administered efficiently and effectively; avoiding fraud and waste, and demonstrating results. The Uniform Guidance was updated on 3/18/2022.

To ensure that you are aware of the topics with which you need to comply, refer to this PCC Compliance Checklist.

In addition, the Whitehouse developed a <u>2 CFR PART 200, APPENDIX XI COMPLIANCE</u> <u>SUPPLEMENT</u> in July 2021 for your reference.

Other Federal Acts

A couple of other significant federal Acts that may guide the work of your grant include:

^{*}If you do not see your funding agency in this list, defer to Title 2 Uniform Guidance for Grants and Agreements.

- <u>General Education Provisions Act</u>, (GEPA) requires you to demonstrate the steps you have taken to ensure equitable access to, and participation in the grant-funded program you are managing.
- Government Performance and Results Act, (GPRA) provides the strategic planning, performance planning, and performance reporting guidance for federal agencies to communicate progress in achieving their missions. It was last updated in 2010.

Records Management and Retention

Based on state regulations, all program documents need to be maintained for a required amount of time. In addition, financial reports should be submitted to your CGA Accountant. For more details about these regulations please refer to <u>Oregon Secretary of State Checklist of Documents to Keep as Project Archives (14)</u>.

Grant Closeout Process

Initiate the grant closeout process at least six months prior to the end of the grant.

Identify

- 1. Identify your expenditures to date and decide if you need to submit a no cost extension (NCE), as allowed by the funder of your grant.
 - → If there is no language in your grant agreement or guidance about an NCE, contact the program officer for your grant to see if the funder will permit an NCE and what the process to submit one is.
- 2. Identify if you intend on submitting an NCE, start working with your Contract and Grant Accountant and Post-Award Grant Officer to develop and submit this NCE within the time frame allowed by the funder.
- 3. Identify how you are going to expand your program and/or the number of students you will serve with the NCE.

Review

1. Review your final expenditures and ensure that all invoices will be paid in the **time period** as allowed by the funder and PCC.

Submit

- 1. Submit invoices to your assigned contract and grant accountant
- 2. Submit final program and fiscal reports as indicated in the grant award agreement

Archive

1. Archive and properly retain all records as outlined at <u>Oregon Secretary of State Checklist of Documents to Keep as Project Archives (14)</u>.

Grant Acronym Appendix

Authorized Official Representative (AOR)

Contract and Grant Accounting (CGA)

Grant Announcement Notification (GAN)

Grants Office (GO)

Institutional Effectiveness (IE)

Intergovernmental Governmental Agreement (IGA)

Memorandum of Understanding (MOU)

No Cost Extension (NCE)

Notice of Award (NOA)

Principal Investigator (PI)

Program Director (PD)

Request for Proposal (RFP)

The Contract and Grant Accounting Office also has compiled a <u>list of terms</u> related to grants.