
Grants-101

Programmatic and Financial Management

Tribal Homeland Security Grant Program

September 27, 2016

**Federal Emergency Management Agency
Grant Programs Directorate (GPD)**



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FEMA Grant Process Overview

Program Development and Eligibility

- Appropriation is enacted
- Notice of Funding Opportunity/ Program Guidance
- Development
- Risk Allocation Determination
- Grant Solicitation Posted

Application Submission and Review

- Grant Rollout
- Application Submission
- Application Review

Award Determinations and Obligation

- Final Award Determinations
- Develop Award Package
- Congressional Notification
- Recipient Notification of Award
- Federal Funding Obligated in the Financial System

Program Implementation and Management

- Funding Available to Recipient through Payment Requests
- Recipient Implements Approved Programs
- Programmatic and Financial Reporting
- Grant Amendments Requested/ Approved
- Strategic and Financial Monitoring

Evaluation and Closeout

- Evaluation and Feedback
- Final Progress and Financial Status Reports
- Grant Closeout



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Program Management



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Tribal Homeland Security Grant Program

- **Purpose:** The Tribal Homeland Security Grant Program supports the building, sustainment and delivery of core capabilities to enable Tribes to strengthen their capacity to prevent, protect against, mitigate, respond to, and recover from potential terrorist attacks and other hazards
- Three-year period of performance will apply



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Grant Acceptance

- 90 days to accept your award from the time of ND Grants system notification
- Read the terms and conditions of the award letter
- Best practice; it is recommended for all the recipients' employees, that have a direct or indirect contact with the grant, to have read and understand the NOFO (i.e. program guidance) & award Terms and Conditions
- Start an official grant folder
- Have a kick off meeting with all the stakeholders (i.e. procurement officials, building inspectors, political representatives, finance office, etc)
- Set realistic project management goals, milestones, and timelines.
- Recognize your budget and project goals vs. limitations you face (e.g. 2 CFR Part 200, PoP, EHP reviews, match requirements, etc)



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Updating the POC in NDGrants

- You will need to set up contacts for each organization to ensure that DHS has point of contacts to communicate important information with the organization. You can add or update contacts for any organization to which you belong. For each organization you belong to, there must be a primary and secondary contact specified.

UPDATING A CONTACT IN NDGRANTS;

- 1 Under the Organization tab, click the Contacts left hand menu link
 - ▶ The Manage Contacts screen will be displayed
- 2 Click the Update link for the contact you want to update
 - ▶ The Add/Update Contacts screen will be displayed, listing the current contact details
- 3 Modify the contact details and the selected organizations, then click the Save and Continue button
 - ▶ The Add/Update Contact Results (Confirmation) screen will be displayed
- 4 Click the Return to Contacts button
 - ▶ The Manage Contacts screen will be re-displayed

*NOTE: Only the Organization Administrator can add or update the contacts of an organization.

ND Grants Service Desk;
Email: NDGrants@fema.gov
Phone: 1-800-865-4076



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Period of Performance

- 36 Month period of performance (not retroactive to past awards)
- POP on the grant starts from September 1, 2016 regardless of when the award was accepted by the recipient
- The recipient will not automatically receive additional time on its period of performance if it accepts the award after September 1, 2016

Extension Review Process

- The extension review process was initiated to evaluate the recipient's request to extend awards beyond the initial Period of Performance (PoP), in support of Information Bulletin (IB) #379. Only those awards that are determined to have met the criteria set forth in IB 379 will be approved for an extension
- Subject to certain exceptions, recipients are required to take steps to expend, draw down, and close out Federal Emergency Management Agency (FEMA) grant funding per IB #379, "Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding," which was released in February 2012
- Due to the complexity of the extension review process, it typically takes 70 days (estimated time) for the package to be reviewed and the recipient to be notified of the final extension; GPD recommends submitting PoP extension requests 90-120 days prior to expiration.

*Note; please see Information Bulletin No. 379 – February 17, 2012
(<https://www.fema.gov/grant-programs-directorate-information-bulletins>)



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Environmental Planning and Historic Preservation (EHP) Compliance

- All projects funded with Federal grant dollars (including cost share) must comply with EHP laws, regulations, and Executive Orders
- An EHP review is an analysis of pertinent project information to determine whether a project may have the potential to impact environmental or historical/cultural resources
- Complex projects will typically require more information/time to reach a determination
- FEMA may be required to consult with the relevant State Historic Preservation Office (SHPO), the U.S. Fish and Wildlife Service (FWS), the U.S. Army Corps of Engineers (USACE), and others to determine impacts to sensitive resources
- The EHP review must be completed by FEMA before initiating any work on any FEMA funded project, even if a previous award/year/program/project has an approved EHP review.
- EHP review is required (post award) for the entire project (including cost share items) prior to starting the project



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EHP Compliance (*continued*)

- Purpose of EHP review is to ensure compliance – not to deny projects. Sometimes projects may be modified to minimized impacts.
- Costs of environmental review (e.g., archeological surveys, reports, etc.) are paid by the grant recipient, and can be part of grant expenditures.
- Grant award recipients are responsible for completing the EHP Screening Form and providing all relevant EHP materials to GPD via the GPD-EHP Mailbox at GPDEHPinfo@fema.dhs.gov
- Many EHP reviews are conducted and completed by FEMA/GPD HQ staff. Some are sent to FEMA Regional Offices for additional review.
- Many reviews are completed within a couple weeks (or less) of receipt. Some may take several or more months, depending on the type of project and review required.
- Projects that involve more in-depth reviews: new construction, communication towers, projects on/in historical buildings/districts, projects with extensive ground disturbance, in-water projects.



EHP Compliance (*continued*)

- Project review begins with completion and submission of an EHP Screening form. A completed screening form includes:
- Clear description of the project, including project location
- Labeled, ground-level photos of the project area
- Aerial photo(s)
- Includes the year built for any buildings/structures involved in the project
- Describes extent (length, width, depth) of any ground disturbance
- Includes any other pertinent EHP info (e.g., environmental studies/surveys, FCC info, permits in-hand, etc.)
- Submitted to GPDEHPinfo@fema.dhs.gov



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EHP Compliance (*continued*)

- Questions about the process: ask your FEMA Program Analyst or send questions to GPDEHPinfo@fema.dhs.gov
- Link to EHP Screening Form and instructions: <http://www.fema.gov/media-library/assets/documents/90195>
- Link to FEMA Policy on GPD EHP Reviews – includes info on review times for different types of projects and other useful information: <http://www.fema.gov/media-library/assets/documents/85376>

Remember – EHP review must be completed before a project can be started!



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Information Bulletins (IB)

- IBs provide additional programmatic and/or administrative instructions and guidelines to stakeholders critical to supporting the effectiveness and efficient delivery of FEMA Grant Programs

<https://www.fema.gov/grant-programs-directorate-information-bulletins>



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Financial Management



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Federal Regulations: 2 CFR Part 200

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- Rules apply to all awards
- Audit Requirements



Applies to all FEMA awards made on or after December 26, 2014. Applies to grants for disasters declared on or after December 26, 2014.



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Getting Started...

1. Review & Accept Award

2. Register in PARS

- a) **Payment and Reporting**

3. Establish Award File

- a) **Award Package**
- b) **Approved IJs & Approved Budget**
- c) **NOFO**
- d) **2 CFR Part 200**



Know Your Points of Contact

Program Analyst – Conducts all programmatic pre-award, award and post-award activity. Reviews programmatic reports and project activity.

HQ Grants Management Specialist - Conducts all financial pre-award and award—and some post-award grant administration functions not delegated to the Regions

Regional Grants Management Specialist – conducts quarterly cash analysis and monitoring activity for HQ Preparedness awards



Financial Management Systems

- Getting started
 - Getting organized for receipt of Federal funds
 - Program vs. financial—not mutually exclusive
 - Understanding Federal requirements
 - Establishing policies and procedures; these are required and will be monitored by funding agency
- **“Minimum”** requirements for financial system
 - Provide financial/performance data
 - Associate grant expenditures to specific funding source
 - Provide clear audit trail
 - Manage cash effectively



Fiscal Matters: Procurement

- 2 CFR Part 200 identifies many substantive changes dealing with procurement. Please reference 200.317 - 200.326
- Identify conditions requiring prior approval
- Pass-through entity (e.g., SAA, Recipient)
 - Develop forms for prior approval
 - 2 CFR Part 200.331 identifies requirements for pass-through entities
- Understand difference between types:
 - Competitive
 - Federal (GSA) or State contract
 - Non-competitive – available only in limited circumstances, including:
 - Item available only from single source
 - Public exigency or emergency
 - After solicitation of a number of sources, competition is determined inadequate
 - Authorized by FEMA or pass-through in response to written request



Monitoring



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Types of FEMA Monitoring

Desk Reviews:

- Financial and Programmatic
- Office-based
- Conference Call or Web-based

Site Visits:

- Financial and Programmatic
- On-site, Direct Contact with Stakeholders
- Visual review of operations and performance sites

**Quarterly Cash Analysis and Programmatic First Line Reviews are additional forms of informal monitoring.*



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What is Financial Monitoring?

- Evaluating business and financial administration
 - Evidence and validation of expenditures
 - Review of policies and procedures
 - Compliance with Federal financial rules and program requirements
 - Measuring accuracy of financial reporting
 - Detailed review of recipient files
- Monitoring should be a partnership between program and financial staff



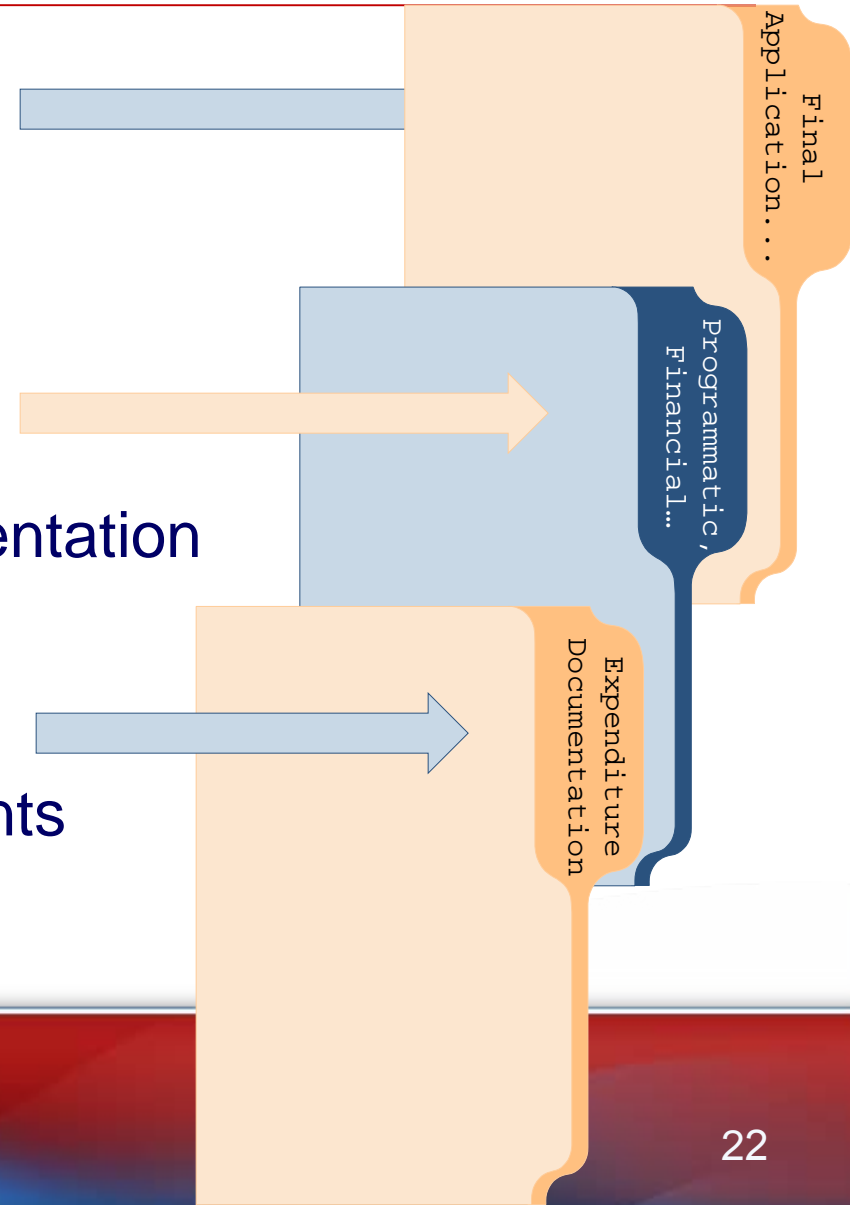
What is Programmatic Monitoring?

- Strategic and Objectives-based
 - Comparing accomplishments to goals
- Technical
 - Measuring implementation of requirements and standards in the Notice of Funding Opportunity (NOFO)/Program Guidance
- Performance
 - Adherence to project scope and investments
 - Completion on time



Monitoring: Examples of Required Documentation

1. Application
2. Award Package
3. Amendments
4. Performance and Financial Reports
5. Expenditure Source Documentation
6. Subrecipient Award Files
7. Policies and Procedures
8. Indirect Cost Rate Agreements
9. Audit Reports



Source Documentation Requirements

- Accounting records must be supported by:
 - Cancelled checks / External source (e.g. financial institution)
 - Time and attendance records
 - Payroll registers
 - Sub-grant award documents
 - Receipts
 - Invoices and purchase orders
 - Executed contracts
 - Travel authorization forms/travel vouchers
 - Federally approved indirect cost rate agreement
 - Fringe benefit rate
 - Inventory Records



Monitoring: What to Expect Post Visit

- Post monitoring letter
 - Agreed upon modifications
 - Remaining compliance issues
 - Follow-up until resolution
 - Recommendations for improvements
 - Recognition of progress and successes
 - Deadline for response, if applicable
 - Copied to Authorized Official



Examples of Program Monitoring Issues

- Inadequate written policies and procedures
- Inadequate subrecipient monitoring plan
- Late, incomplete, or incorrect reporting
- Inadequate EHP documentation
- Lack of documentation of project progress
- Inadequate project progress due to:
 - Procurement issues
 - EHP issues
 - Delays due to disasters, unforeseen major events, etc.



Examples of Financial Monitoring Issues

- Similar issues to program monitoring findings:
 - *Inadequate written policies and procedures; Lack of subrecipient monitoring plan; Late, incomplete, or incorrect reporting; lack of documentation*
- Inadequate accounting procedures
- Period of Performance expiration
- Drawing down funds too quickly or too slowly
- Failure to manage audit results
- Inventory management deficiencies
- Commingling and Supplanting



It's All about Relationships

- Get to know your:
 - Program Analyst
 - Grants Management Specialist
 - Region and HQ Staff
- Ask questions
- Schedule appointments for more in-depth assistance, if needed
- Success is enhanced by positive working relationships



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Financial and Programmatic Reporting



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Financial Reporting: Accurate Data

- Federal standards
- Recipient: Required to expend and account for grant funds
 - State laws/procedures
 - Internal accounting system
- Federal Financial Report (FFR) SF 425 used for all Recipients
- Reporting requirements found in Grant Terms and Conditions and/or the Notice of Funding Opportunity (NOFO) / Program Guidance
- Specific instructions for each line item of the report can be found at the following website:
 - http://www.whitehouse.gov/omb/assets/omb/grants/standard_forms/ffr_instructions.pdf



Financial Reporting Schedule for FEMA Grants

Quarter	Calendar Quarter	Report Due Date	E-mail Reminder Sent
First Quarter	Oct 1 – Dec 31	Jan 30	Jan 31
Second Quarter	Jan 1 – Mar 31	Apr 30	May 1
Third Quarter	Apr 1 – Jun 30	Jul 30	Jul 31
Fourth Quarter	Jul 1 – Sep 30	Oct 30	Oct 31



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Financial Reporting: FFATA

- Information Bulletin 350 re: Federal Funding Accountability and Transparency Act of 2006 (FFATA)
 - OMB maintains single, searchable database of Federal spending with full disclosure to the public at www.usaspending.gov
- Reporting Timeline for Prime Recipients
 - Starting October 1, 2010, all new Federal awards of \$25,000 or more are subject to FFATA (including recipients)
 - Includes reporting on sub-awards of \$25,000 or more



Programmatic Reporting: FEMA Grants

- Performance Progress Report (SF-PPR)
 - Due 30 days after the end of the reporting period
 - Different programs submit reports in various systems and methods
 - THSGP has additional reporting requirements
 - Biannual Strategy Implementation Report (BSIR)



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Amendments



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Amendments = Change

- An amendment is a formal written change to the award that typically requires prior written approval from FEMA in accordance with 2 CFR Part 200, the Notice of Funding Opportunity (NOFO)/Program Guidance, applicable program regulations, and Terms and Conditions of the award
- Amendments are covered in 2 CFR 200.308



Examples of Amendments

- Period of performance extension
 - Recipient must formal request an extension to their period of performance end date
- Scope of Work Change
- Budget Change
 - Cumulative Transfers that exceed 10% of the latest approved budget when FEMA's share exceeds \$150,000.
 - For grants award prior to December 26, 2014, approved is required when FEMA's share exceed \$100,000.
- Changes in cost-share or match



Closeouts



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Recipient Closeout

- Final reports due to FEMA
 - Due within 90 days after end of award or any approved extension
 - Final progress report
 - Performance Progress Report (PPR)
 - Biannual Strategy Implementation Report (BSIR)
 - Final FFR (SF-425)



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Federal Financial Report

- Due within 90 days after end of award or any approved extension
 - No unliquidated obligations
 - No remaining Recipient share (match) to be provided
 - Indicate exact balance of unobligated funds
 - Final federal amount charged for indirect costs
 - Indicate total program income earned and expended
 - Signature of authorized official for Recipient
 - Remit check to FEMA for excess funds

Reset Form

FEDERAL FINANCIAL REPORT
(Follow form instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)		Page 1 of	page:		
3. Recipient Organization (Name and complete address including Zip code)							
4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)		6. Report Type <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting <input type="checkbox"/> Cash <input type="checkbox"/> Accrual		
8. Project/Grant Period From: (Month, Day, Year)		To: (Month, Day, Year)		9. Reporting Period End Date (Month, Day, Year)			
10. Transactions					Cumulative		
(Use lines a-c for single or multiple grant reporting)							
Federal Cash (To report multiple grants, also use FFR Attachment):							
a. Cash Receipts							
b. Cash Disbursements							
c. Cash on Hand (line a minus b)							
(Use lines d-o for single grant reporting)							
Federal expenditures and Unobligated Balance:							
d. Total Federal funds authorized							
e. Federal share of expenditures							
f. Federal share of unliquidated obligations							
g. Total Federal share (sum of lines e and f)							
h. Unobligated balance of Federal funds (line d minus g)							
Recipient Share:							
i. Total recipient share required							
j. Recipient share of expenditures							
k. Remaining recipient share to be provided (line i minus j)							
Program Income:							
l. Total Federal program income earned							
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)							
11. Indirect Expense							
	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
					g. Totals		
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation.							



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Retention of Records

- Retention of records 2 CFR 200.333-337
 - **General rule**: Three (3) years from the date of submission of final expenditure report as reported to FEMA (or pass-through entity, for subrecipients)
 - **Exceptions to the general rule** include: records for real property and equipment must be three (3) years after final disposition; records must be retained until resolution of any action such as litigation claim, negotiation, or audit
- Non-Federal recipients should also follow their own records retention policies
- Obligation to protect records
- Authorized access to records



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Audit Trends and Findings



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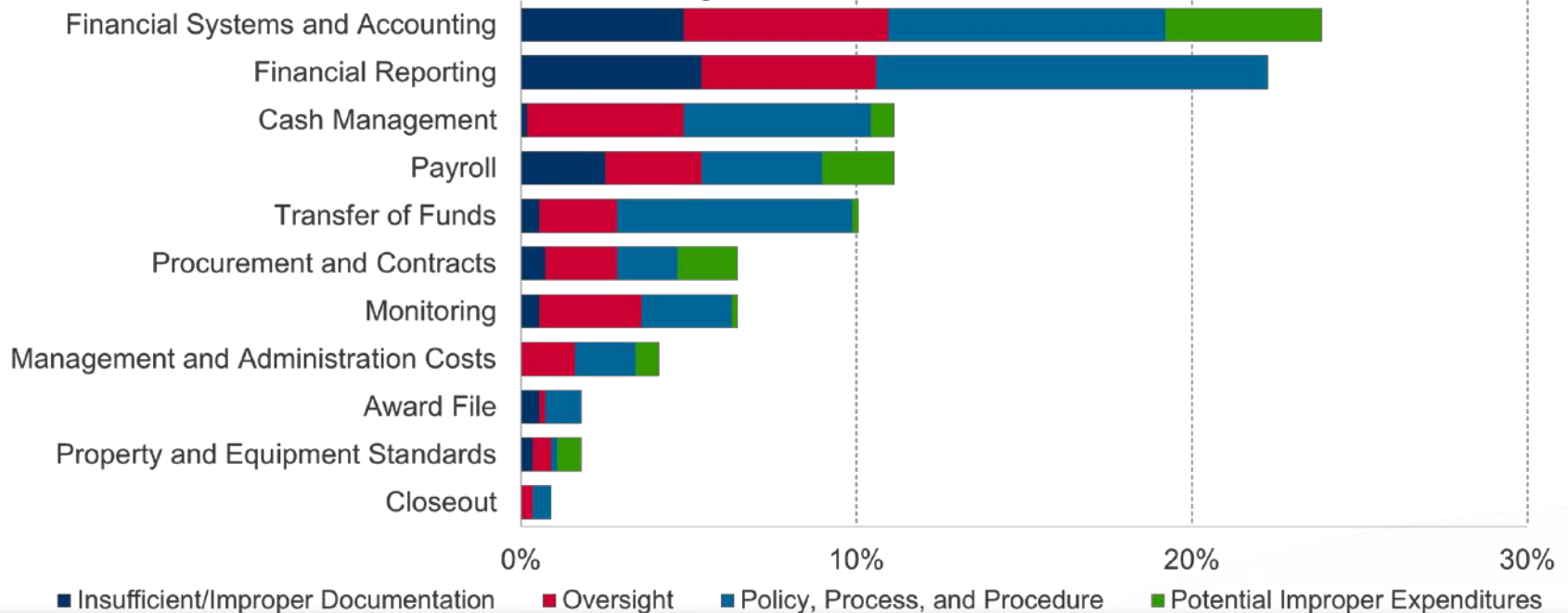
Audit Trends and Findings

- GPD examined audit reports and 941 associated recommendations issued from 2008 to 2016
- Includes data from OIG and state, local, and independent third-party A-133 audits of:
 - Homeland Security Grant Program
 - Tribal Homeland Security Grant Program
 - Emergency Management Performance Grant
 - Port Security Grant Program
 - Transit Security Grant Program
 - Intercity Passenger Rail grant program
 - Assistance to Firefighters Grant
 - Staffing for Adequate Fire and Emergency Response grant
 - Fire Prevention and Safety grant
 - Regional Catastrophic Preparedness Grant Program



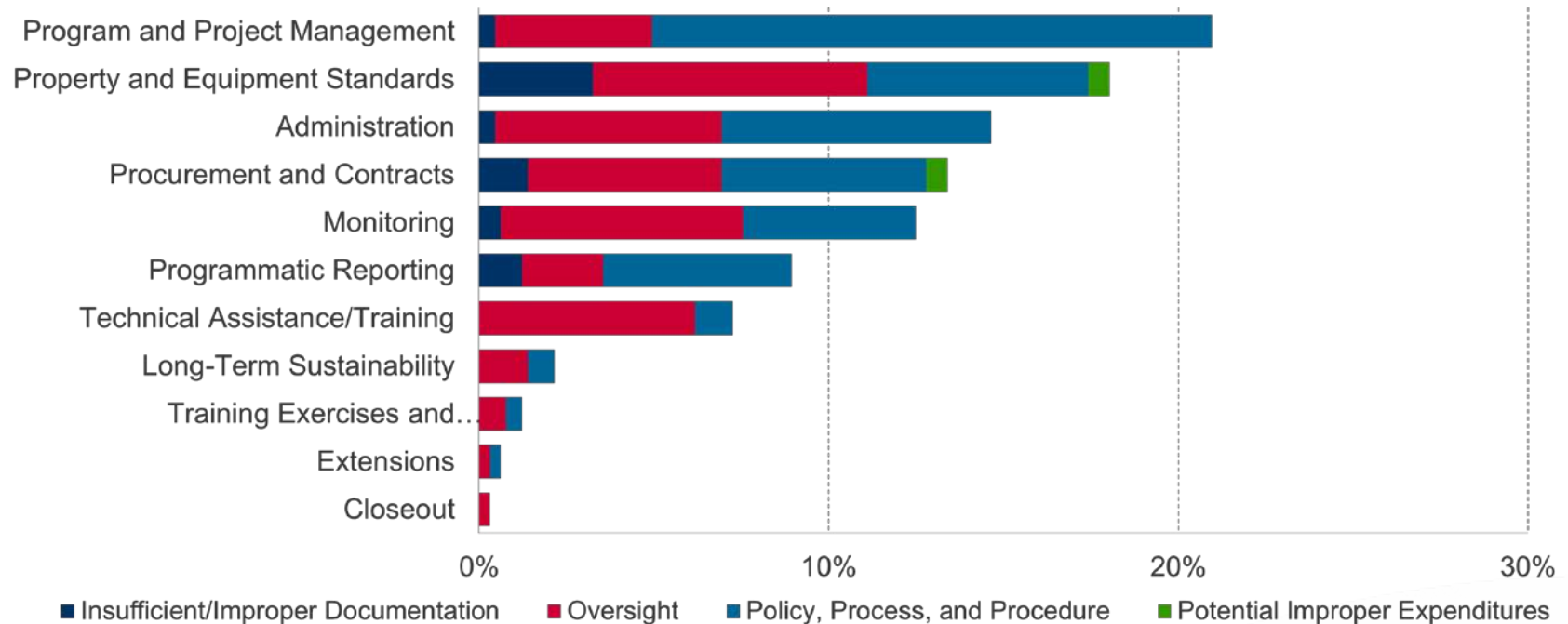
Financial Issues - Causes

- Financial Systems and Accounting (24 percent) and Financial Reporting (22 percent) accounted for the largest amount (46 percent) of all financial recommendations
- Financial Reporting recommendations were linked primarily to Policy, Process, and Procedure challenges (52 percent)



Programmatic Issues - Causes

- Program and Project Management (21 percent) and Property and Equipment Standards (18 percent) accounted for 39 percent of all programmatic recommendations



Training and Technical Assistance Opportunities



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GMTA Program

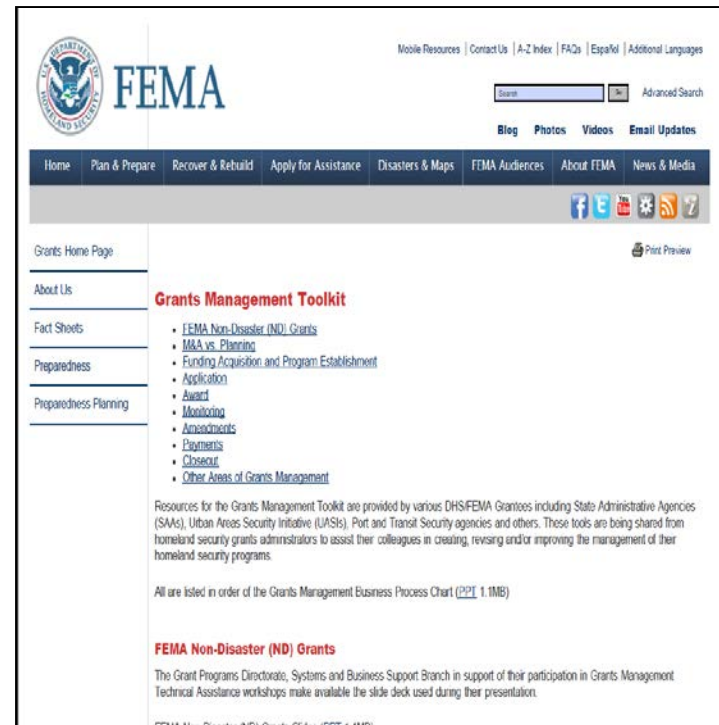
“Promote sound business practices for grants administration”

- Level I Technical Assistance
 - Information Sharing
 - Collecting/Sharing Promising Practices
 - Networking with Subject Matter Experts
- Level II Technical Assistance
 - Creation of New Resources (i.e. PPT)
- Level III Technical Assistance
 - Direct TA Deliveries and Direct TA Deliveries and Workshops



Promising Practices: Grants Management Toolkit

- Grants management resource clearing house from DHS FEMA recipient and subrecipient stakeholders
- Toolkit assists recipients in creating, revising, and/or improving the management of the grant programs
- <http://www.fema.gov/grants-management-toolkit>



The screenshot shows the FEMA website's Grants Management Toolkit page. At the top, there is the FEMA logo and navigation links for Mobile Resources, Contact Us, A-Z Index, FAQs, Español, and Additional Languages. A search bar is located to the right of the logo. Below the search bar are links for Blog, Photos, Videos, and Email Updates. A main navigation menu includes Home, Plan & Prepare, Recover & Rebuild, Apply for Assistance, Disasters & Maps, FEMA Audiences, About FEMA, and News & Media. Social media icons for Facebook, Twitter, YouTube, and RSS are also present. The main content area features a sidebar with links to Grants Home Page, About Us, Fact Sheets, Preparedness, and Preparedness Planning. The main content area is titled "Grants Management Toolkit" and lists various resources: FEMA Non-Disaster (ND) Grants, MAA vs. Planning, Funding Acquisition and Program Establishment, Application, Award, Monitoring, Amendments, Payments, Closeout, and Other Areas of Grants Management. Below this list, there is a paragraph explaining that resources are provided by various DHS/FEMA Grantees and that these tools are shared to assist grant administrators. A link to a Grants Management Business Process Chart (PDF, 1.1MB) is provided. The page also includes a section for FEMA Non-Disaster (ND) Grants, mentioning technical assistance workshops.

Technical Assistance Resources

- GPD Technical Assistance Webpage
http://www.fema.gov/government/grant/technical_assistance.shtm
- Technical Assistance Catalog
http://www.fema.gov/pdf/about/divisions/npd/npd_technical_assistance_catalog.pdf
- Non-Disaster Grants System Online Grant Recipient Tutorials
(<https://www.fema.gov/media-library/assets/documents/92630>)



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Questions

- Grant Operations Division
 - Operations Control Desk
 - 866.927.5646
 - ASK-GMD@dhs.gov
- Centralized Scheduling and Information Desk (CSID)
 - 800.368.6498
 - askcsid@dhs.gov

