

GOVERNOR'S OFFICE OF FEDERAL ASSISTANCE

NEVADA'S FEDERAL GRANT RESOURCE

Post-Award Financial Management

General Housekeeping

- **Welcome**
- Training will be recorded and will be stopped during Q&A
- Today's training video and the resources shared will be posted to our website
- If you have a question, drop it in the chat
- Close Captioning is available, please click the CC button at the bottom of your screen

About Us

The Governor's Office of Federal Assistance, or OFA, was created with the passage of Assembly Bill 445 of the 81st Legislative Session

Vision

The Governor's Office of Federal Assistance supports our stakeholders in obtaining, increasing, and maximizing federal assistance.

Mission

The Governor's Office of Federal Assistance reduces barriers by providing inclusive, collaborative, comprehensive, and centralized support in obtaining federal dollars for Nevada.

Meet your Trainer

Mayita Sanchez, MPA
Executive Grant Analyst



Outcomes

An understanding of fiscal grant management activities after an award is received

The initial authority to spend a grant

Compliance with 2 CFR 200 throughout the grant award

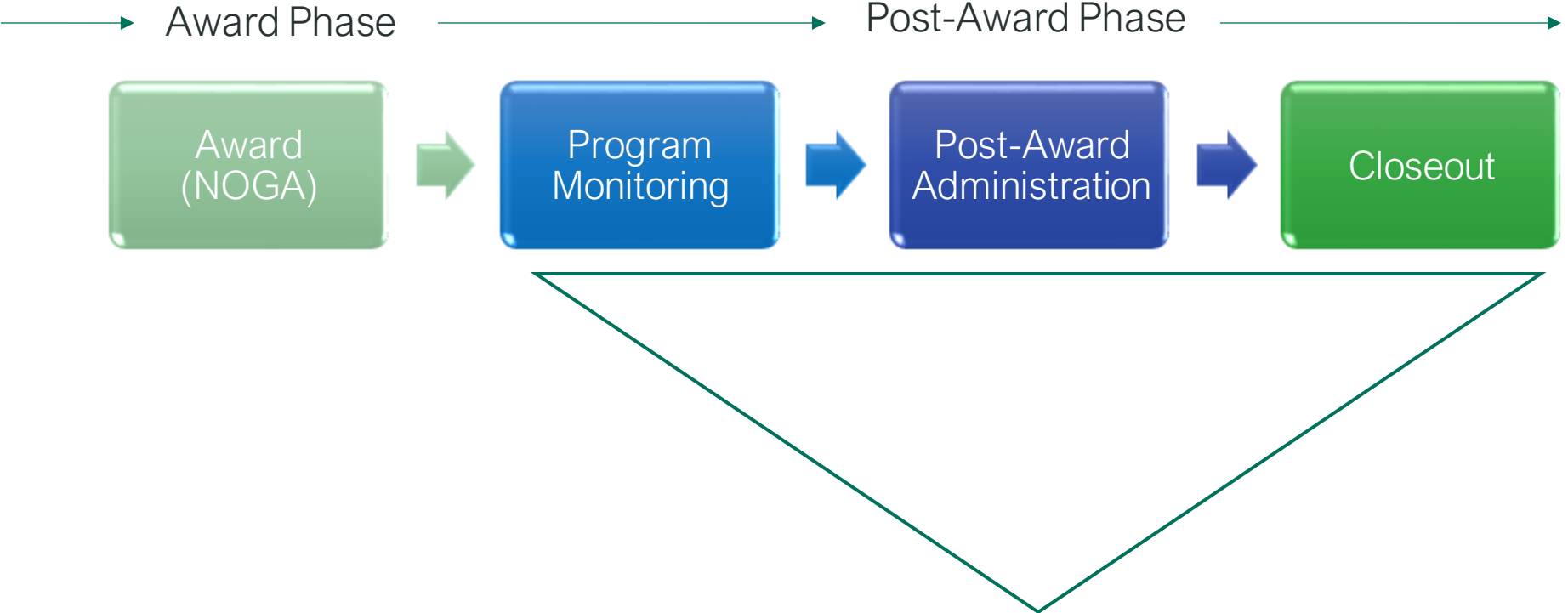
Fiscal closeout

Final reports at the end of a grant period

Disclaimer

- A non-federal entity is responsible for complying with all requirements of a Federal award, this includes provisions of FFATA (2 CFR 200.300)
- Uniform Guidance *cannot address every potential cost*
- Uniform Guidance *does* provide regulations regarding how a non-federal entity should
 - Determine Allowability
 - Apply Costs
 - Matching Funds
 - Program Income
 - Direct and Indirect Costs

Where are we?



*200.302 Financial Management (a) each state must expend and account for the Federal award in accordance with state laws and procedure for expending and accounting the state's own funds. In addition, the states and the other non-Federal entity's financial management systems, including records documenting compliance, regulations, and the terms and conditions, **must be sufficient to permit the preparation of reports** required by general and program specific terms and conditions; and the **tracing of funds to a level of expenditure adequate to establish that funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.***

POST-AWARD

Considerations

- Cash-Flow
- Cost-Share
- Administrative Overhead Costs

Mandatory

- Unique Entity Identifier
- A Financial Management System
- Internal Controls
- Procurement Policy
- Written Procedures

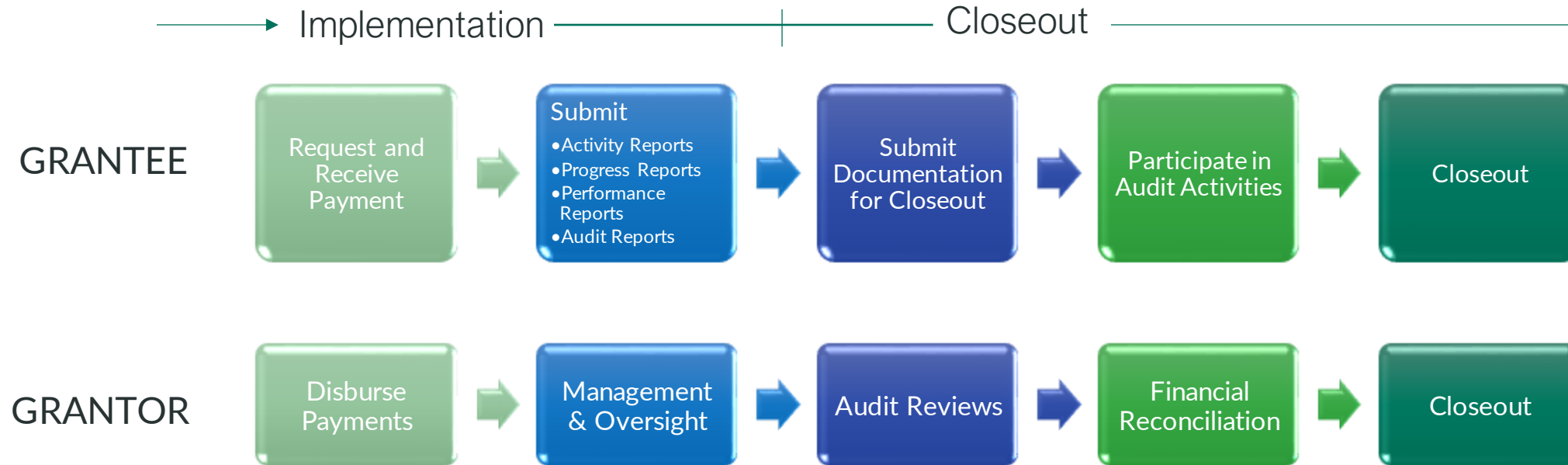
Accepting Your Award

- Become familiar with the Schedule of Expenditures of Federal Awards (SEFA)
- Know how to account for funds appropriately
- Who is your primary contact
- How often do you have to report
- What needs to be reported

Financial Management

- A financial management system of each non-federal entity must:
- **Identify**
 - All Federal awards received
 - All Federal awards expended, and
 - The Federal programs under which they were received
- Accurate, current & complete (2 CFR 200.328 & 200.329)
 - Disclosure of financial results of each award or program
- Records that identify adequately the source and application of funds
- Effective Internal Controls (2 CFR 200.303)
- Comparison of expenditures with budget amounts for each Federal award
- Written procedures for
 - Implementing the requirements for Federal Payment ([2 CFR 200.305](#))
 - Determining the allowability of costs in accordance with Federal cost Principles ([Subpart E](#))

Financial Post-Award Map



Federal Cost Principles

- Cost Principles *are not always clear cut*
- Allowability of an expense depends upon your specific grant (*read your Notice of Grant Award*)
- **At a Minimum**
 - Expenditures are treated consistently regardless of their funding source (2 CFR 200.400(e))
 - Intended to ensure that a non-federal entity creates an
 - Efficient &
 - Effective system for administering federal awards (2 CFR 200.400(c))

Costs

Allowable

- Reasonable
- Given Consistent Treatment

Reasonable

- Must be able to withstand public scrutiny, *they would agree the cost is appropriate*

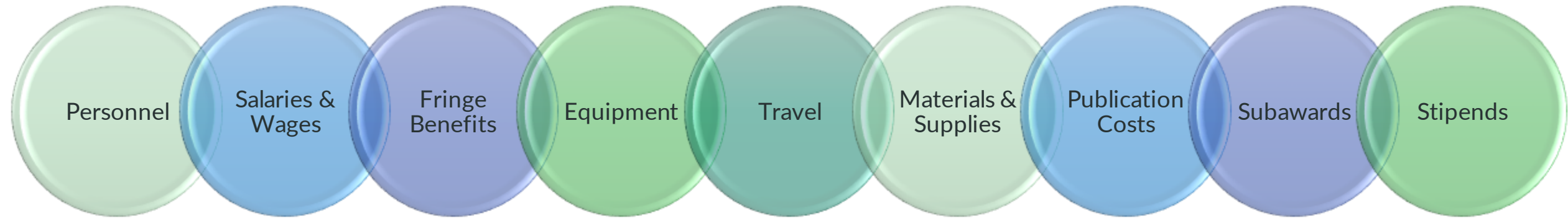
Allocable

- Incurred solely to support the award *or the processes of assigning the cost must be reasonable*

“A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.”

Direct Costs

- 2 CFR 200.413
- *Costs that can be identified specifically with a particular final cost objective or that can be directly assigned to activities relatively easily with a high degree of accuracy*



Indirect Costs

- 2 CFR 200.414
- *Costs that are not readily identifiable with a particular grant or cost objective but are still needed for the general operation of an organization to administer an award (sometimes referred to as overhead)*



True Cost

- True Cost is the real cost to perform a program or grant



Financial Reporting, Reporting Program Performance

- The awarding agency must use OMB-approved common information collections when providing financial & performance reporting information
- Must require the recipient to relate financial data and accomplishments to
 - Performance goals, and
 - Objectives
- Recipient may have to provide cost information to demonstrate cost effective practices
- Reporting requirements must be clearly articulated
- Performance during the execution of an award has a standard against which non-federal entity performance can be measured

Success as a Pass-Through Entity

- A non-federal entity that has received a federal award as a prime recipient may choose to distribute funds to subrecipients through a competitive process for implementation of portions of the federal award
- The non-federal entity may choose to distribute funds to subrecipients in a non-competitive manner

Subrecipient	Contractor
Carries out a portion of a federal award and creates a federal assistance relationship with the subrecipient	Obtains goods or provides services for the non-federal entity and creates a procurement relationship
Determines who is eligible to receive federal assistance	Provides goods/services within normal business operations
Measures performance to determine if the federal program objectives were met	Provides similar goods/services to many different purchasers
Responsible for programmatic decision-making	Normally operates in a competitive environment
Responsible for adherence to program requirements specified in the federal award	Provides goods/services ancillary to federal program
Utilize federal funds to carry out the program for the benefit of the public as specified in the award/statute, etc.	Not subject to compliance requirements because of the agreement but may have other requirements related to state procurement rules

Financial Reporting, Monitoring

- 2 CFR 200.328 **Information** must be collected with the frequency required by the terms and conditions of the award, but *no less* than annually, and *no more* than quarterly (except in unusual circumstances, i.e., when needed for effective monitoring)
- 200.329(a) The non-Federal entity is **responsible for monitoring and oversight** of the operations of the award supported activities
 - They must monitor its activities to assure compliance
 - & Compliance with performance expectations
 - Must cover each program, function or activity
 - This includes Pass-through entity responsibilities ([2 CFR 200.332](#))
- (f) **Site Visits** by the awarding agency may occur as warranted by program needs

Financial Reporting, Blips

- (e) Significant developments

- An event may occur between the scheduled performance reporting dates that have significant impact upon the supported activity
- A non-federal entity *must* inform the awarding agency or pass-through entity as soon as –
 - Problems, delays, or adverse conditions that impair the ability to meet the objective of the federal award occur
 - The disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve
 - Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated

FEDERAL FUNDING ACCOUNTABILITY & TRANSPARENCY ACT (FFATA)

- FEDERAL SUBAWARD REPORTING SYSTEM (FSRS)
- THIS TRANSPARENCY ACT requires information disclosures concerning entities receiving Federal financial assistance through Federal awards, i.e., contracts, sub-contracts, grants, and sub-grants
- INFORMATION IS MADE available on a publicly available website ([USASpending](#)) that contains the following information
 - ✓ The name of the entity receiving the award.
 - ✓ The amount of the award.
 - ✓ Information on the award including transaction type, funding agency, the North American Industry Classification System code (NAICS) or Catalog of Federal Domestic Assistance (CFDA) number, program source, and an award title descriptive of the purpose of each funding action.
 - ✓ The location of the entity receiving the award and the primary location of performance under the award including the city, state, congressional district, and country.
 - ✓ A unique identifier of the entity receiving the award and of the parent entity of the recipient, should the entity be owned by another entity.
 - ✓ The names and total compensation of the five highest-paid officers of an entity if, in the preceding fiscal year, that entity received: 80% or more of its annual gross revenues in Federal awards, \$25,000,000 or more in annual gross revenues from Federal awards, and the public does not already have access to data on executive compensation through reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934, or section 6104 of the Internal Revenue Code of 1986.
 - ✓ Any other relevant information specified by OMB.

Single Audit

- SINGLE AUDIT AND CASH MANAGEMENT REPORTING ACTIVITIES INCLUDE
 - Preparation of the U.S. Treasury-state agreement
 - Preparation of memorandum of agreements
 - Provide single audit training to state agencies
 - Preparation of the schedule of expenditures of federal awards
 - Compilation of prior year audit findings
 - Preparation of cash management improvement act annual report
- FOR STATE AGENCIES
 - State of Nevada must follow the Single Audit Act Amended in 1996
 - Each state agency receiving federal funds is required to provide information requested
 - [SUBMIT ON THE SINGLE AUDIT CERTIFICATION FORM OR SAC](#)
- MOST RECENT SINGLE AUDIT REPORT CAN BE FOUND [HERE](#)

Source Documentation with Examples

Invoices	Deposit Slips	Time Sheets
Payroll Reports	Bank Statements	Canceled Checks
Expense Reports	Packing Slip	Purchase Invoice
Receipt of Paid Invoice	Parking and Toll Receipts w/date, location, amt. paid	Mileage Log

For eligible expenses for reimbursement source documentation must be sufficient to prove that it aligns with the notice of grant award and directly relates to the work being performed and is supported by cost tracking, as well as being reasonable and allowable under federal and state laws and regulations. Note, internal policies and procedures may impact what is considered appropriate source documentation.

Federal Payment

- [2 CFR 200.305](#)
- For non-federal entities (other than states) payments methods must minimize the time elapsing between the transfer of funds from the US Treasury or the PTE and the disbursement by the non-federal entity
- When using the reimbursement method, the federal awarding agency or PTE must make payment within 30 calendar days after receive of the billing, unless the federal awarding agency or PTE reasonably believes the request to be improper
- A non-federal entity must be able to account for funds received, obligated, and expended
- Draw-down: accessing the federal grantors payment website and transferring funds from the federal government account to the non-federal grantees account

Payment Management System

- A PMS supports the entire financial assistance payment process for both the Awarding Agency and the Grant recipients including:
 - Centralized Payments
 - Cash Management
 - Financial Reporting
 - Debt Management
 - Audit Assistance
 - Dedicated Support Staff
- To review how to Request Access (either new or reactivate) review the Program Support Center Training Video at [\(721\) HHS PSC PMS User Access Training FINAL FROM AE – YouTube](#)
- Once User Access is established in a PMS, as a grantee you will be able to
 - View Available Funds
 - Request Funds, &
 - Submit Reports

Federal Payment



- **Payment Requests:** may be made as often and as needed including daily, weekly or monthly
- **Journal Voucher (JV):** used to transfer amounts between accounts to distribute charges to the correct PMS Account – a JV should be used if:
 - There are different bank accounts on the subaccounts that are being debited and credited
 - The subaccounts that are being debited and credited are on different payee account numbers
 - Download the JV Instructions and Sample Letter [HERE](#)
- **SF-425 Federal Financial Report (FFR):** the standard form used by recipients that receive federal funds to report cumulative expenses – usually reported per grant every quarter

Find your PMS Liaison Accountant

[PMS User Guide | HHS PSC FMP Payment Management Services](#)

Find your PMS Liaison Accountant

Looking for your PSC PMS Representative? Simply use the form below to be directed to the correct PMS Liaison Accountant.

Grants Awarded By U.S. Department of Health and Human Services (HHS) Agencies:

HHS accounts are organized under four functional areas. Please select the area for your account to find your PMS Liaison Accountant.


For State and US Territory Governmental Accounts Please Choose a State or Territory:	
For University & Hospital Accounts Please Choose the State or Territory:	
For Non-Profit & For Profit Accounts Please Choose the State or Territory:	
For Indian Tribal Organizations Please Choose the State or Territory:	
For International Accounts Please Choose the Awarding Agency:	


Grants Awarded By Non U.S. Department of Health and Human Services

Please select the specific Non-HHS Agency to find your PMS Liaison Accountant:

<input type="text"/>	<input type="button" value="GO"/>
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- Corporation for National and Community Service (CNCS)
- United States Department of Agriculture**
 - Agricultural Research Service (ARS)
 - Agricultural Marketing Service (AMS)
 - Food Safety & Inspection Service
 - Office of Advocacy and Outreach (OAO)
- Department of Defense**
 - Office of Local Defense Community Cooperation
- Department of Homeland Security**
 - Federal Emergency Management Agency (FEMA)
 - Office of Chief Procurement Officer (OPO)
 - US Customs Service
- Department of Labor**
 - Mine Safety & Health Administration (MSHA)
 - Bureau of Labor Statistics
 - Veterans' Employment & Training Service (VETS)**
 - Office of the Assistant Secretary for Policy (OASFP)
 - Office of Disability Employment Policy (ODEP)
 - Bureau International Labor Affairs (ILAB)

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Closeout

- Non-federal entities must submit a final financial, performance, and other reports required under the awarded grant *and* meet the award conditions of their grant, within 120 days after the grant award expires (or is terminated) (2 CFR 200.344)
- Preparation for closeout should start 3 months prior to the end date of your award
- Purpose of closeout is to ensure–
 - Final reports are submitted in a timely manner for review and evaluation
 - Allowable costs are determined
 - Final amounts due are identified and payment arrangements are made
 - Any real or tangible personal property is accounted for

Closeout for Discretionary Award Recipients

- Within those 120 days *after the end of the project period* you must:
 - Reconcile final financial expenditures associated with your award
 - Liquidate all obligations incurred under the award ([2 CFR 200.344](#))
 - Return any funds due to the PMS due to any refunds, corrections, or audits
 - Submit any required final reports
 - *Always* refer to your Notice of Grant Award for Closeout requirements

...those final reports

- Post-Award Reporting [Forms](#)
- Final FFR (Federal Financial Report), SF-425
 - Submitted via your PMS (always check your NOGA)
 - Verify that your report is accurate before hitting that SUBMIT button!
- Final Progress Report (FPR)
 - No template, see NOGA
 - Should cover entire project period and at a minimum include an overview of the goals and objectives in your grant application that were accomplished during the funding period
- Tangible Personal Property Report (TPPR) SF-428-B (or, if applicable SF-428-S)
 - Completed by recipients to account for tangible personal property
 - Acknowledge equipment acquired under the award if it will be retained for use as originally approved
 - Or – request the federal agency for disposition instruction if no longer needed for original purpose
 - IF you did not acquire personal property – still submit your report and indicate that no property was acquired

HOW OFA CAN SUPPORT YOU

- [Notice of Funding Opportunity](#)
- [Federal Grant Discovery](#)
- [Updated Grant Manual](#)
- Upcoming Training
 - Date
 - Registration Link
- <https://OFA.nv.gov> & [OFA Newsletter](#)
- [Request Technical Assistance](#)



Post-Award Financial Management Thank You

