2018 DC Grants Management Conference

City-Wide Grants Manual and Sourcebook

What We'll Cover

- The District's Sourcebook

- Award Types

- Grantmaking Authority

- Competitive Requirements

- Pre-Award & Post-Award

  Requirements

- Audits

- Reporting

- Your Feedback

Our Core Focus Areas

- Capacity Building
- City-Wide Donations Management
- Strategic Partnerships & Resource Development
- **Agency Grants Management & Administration Support**

Background: The Sourcebook

- The City-Wide Grants Manual and Sourcebook (Sourcebook) was *first* published on December 30, 2009 by OPGS.

- Sourcebook is for the use of District of Columbia Offices, Departments, Agencies, Boards and Commissions ("Agencies") that are subordinate to the Mayor.

  - Provides city-wide guidance to District Agencies staff on grants and/or subgrants.

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Background: The Sourcebook

- It establishes "best practices" policies and procedures for awarding and administering of grant funds;

- Provides uniform guidelines for the programmatic operation of the grants and subgrants by agencies;

- References relevant law, rules and regulations as well as contains some sample forms for amendment Agencies as the make competitive and subgrants.

Award Types: Step One - Determination

Procurement vs. Grant - Apply the following criteria:

(a)   Is there a statute that authorizes the District Agency to support or stimulate the activity of the recipient and authorizes the grant/subgrant?

(b)   Is the principal purpose of the relationship the transfer of money, property, or services, to the grantee or subgrantee to accomplish a public purpose authorized by statute, rather than an acquisition of goods or services for the direct operation of the District government?

If the answers to (a) and (b) are "yes," a grant is appropriate.

Award Types: Grant vs. Subgrant

For the Purposes of Our Sourcebook

A grant, is the award of money or property by the District (the "grantor") to a recipient (the "grantee") to support or stimulate the accomplishment of a public purpose as defined by the Federal or District law that authorizes the grant.

A subgrant, is the award of grant funds received by the District from another source (generally the federal government) to a subrecipient (the "subgrantee") to accomplish the same public purpose.

Grantmaking

- Agencies derive their grantmaking authority from District or federal statutes, rules or regulations.

- However, an agency does not need grantmaking authority to apply for a federal grant and make subgrants.

- Avoid "even the appearance of a conflict of interest" in its grantmaking activities.

Grantmaking

- Have written public and procedures for administering and monitoring their grants and subgrants before an award is made.

- Confirm that the prospective awardee is current in its **DC tax, business license and other applicable requirements before making an award.**

- Maintain sufficient records detailing the history of each award and keep least (3) years.

- Agencies must identify and appoint an Agency "point of contact" with experience or training necessary to administer the Agency's grants operation.

Grantmaking: Agency POC Expectations

- Grants Managers Should be Familiar With:

  1.) The City-wide Grants Manual and Sourcebook

  2.) Uniform Guidance/Uniform Administrative Requirements

  3.) The OCFO's "Subrecipient Monitoring Manual" (SMM)

  4.) Grant Administration Act of 2013

  5.) Title 1, Chapter 50 of the D.C. Municipal Regulations

- Follow, Obey, Comply with the Rules & Reporting Requirements

- Seek Guidance and Attend Trainings

Grantmaking: Competitive Issuance of Grants

- Every Agency must award its grants and subgrants on a competitive basis unless the award is an approved:

    1.) *sole source (prior approval required)

    2.) earmark (via City Council)

    3.) unsolicited proposal

    4.) value is under $50,000

Grantmaking: Competitive Issuance Exceptions

"Sole Source" is appropriate when:

1.) The funder names the grantee/subgrantee

2.) Some law, rule or regulation defines eligibility in such a way that there is only one possible application or awardee

3.) A recognized coalition of service providers does not exist through which the broadest participation may be obtained.

4.) When the targeted services are available from only one source.

Grantmaking: Competitive Issuance Exceptions

Waiver Requests:

- Agencies may request a waiver from the "Grantmaking Procedure Waiver Committee" (GPWC)

- The GPWC was established by Section IV of Mayor's Order.

- The GPWC is comprised of members appointed by the Mayor's General Counsel, OPGS, OCA and Mayor's Office of Legal Counsel.

Grantmaking: Pre-Issuance Requirements

Agency must:

- Ensure funding is available to cover grants
- Prepare and post "Notice of Funding Availability" (NOFA) in the DC Register for at least 14 days
- Send grant notification to The Mayor's Office of Partnerships and Grant Services
- Prepare and publish "Request for Application" (RFA)
- Publish grantmaking policies and procedures
- Establish a review panel.

Pre-Award Process

- Convene your review committee
- Ensure selected grantee meets minimum requirements
  - Current on all taxes and liabilities to the District
  - Clean Hands Affidavit
  - Certificate of Good Standing
  - Submit a signed affidavit attesting no influence in grant award process
  - Is not debarred from procurement by District or Federal government
- Negotiate and execute the grant agreement.
- Notify unsuccessful applicants

Post-Award Requirements

Agencies have (4) Post-Award Requirements:

1. Monitor
2. Reveiw
3. Report
4. Audit

Post-Award Requirements

Agencies shall:

- Publish written grantmaking policies and procedures which include appeal rights for unsuccessful applicant.

- Conduct and document oversight of grants and subgrants.

- Maintain a monitoring system that ensures awardees perform in accordance with the terms and conditions of their grants or subgrants.

- Engage awardees in at least two monitoring activities per year to check for fiscal and programmatic compliance.

Monitoring Grants

- Agencies will need to evaluate operational, financial and management systems and practices and assign relative risk assessment rankings as either "low" "medium" or"high."
- Agencies monitoring plans should:
  1.) identify the priority of all awardees to be monitored;
  2.) describes the process and criteria used to select and prioritize awardees for monitoring;
  3.) determine the relative frequency and depth of review.

Monitoring Grants

- Monitoring activities may be conducted by:

    1.) phone contact

    2.) written communication

    3.) site visit

    4.) periodic review(s) (monthly, quarterly or semi-annual)

    5.) any combination of the above.

- Monitoring personnel should have duties separate from any other function related directly to the administration of grants.

Monitoring Reports

- Identify grantee and subgrantee information and the award(s) monitored;
- Describe program activities and eligible client population;
- State the date(s) of the review;
- Identify the reviewer(s);
- Describe the monitoring activities used to collect information;
- Clearly set forth the findings to applicable Federal and/or District regulations and requirements;
- Identify corrective action recommendations, when the corrective action plan is due and to whom it should be submitted; and
- Note staff's observations (strengths and weaknesses) in the areas of internal controls and financial reporting, at a minimum.

Reviewing Grants

- Monitoring staff must obtain and review written reports from the awardee based on the risk level assigned to it by the Agency.
- If those reports disclose questionable costs/disbursements, further review or action may be necessary prior to close-out of the grants/subgrants.
- If the awardee cannot justify questioned cost within a reasonable period, the awarding Agency should disallow that cost(s) and recover the same within 45 calendar days final notification of disallowance to the awardee.
- If the reimbursement is not timely received, that awardee may not receive any additional grant/subgrant until such time as the reimbursement made in full.

Recordkeeping

- Monitoring staff must prepare and submit written reports to the Agency Director.

- Such reports must be maintained in the files and made available for audit purposes.

- Reports must be retained in accordance with applicable retention schedules/policies.

Audits

- Agencies must schedule A-133 type audit for awardees that expend $500,000 in grant year.

- OFCO's "Office of Integrity & Oversight" (OIO) has been designated to coordinate the District of Columbia's Single Audit and follow-up on outstanding findings that are part of the Single Audit.

Audits

- Agency monitoring reports, which contains grantees risk assessment, will determine the type of audit and/or financial statement required:

  - **"Low Risk":** amount expended by the awardee **is less than $250,000;** may file a simple financial report: an income statement and a balance sheet;

  - **"Medium Risk":** amount expended by the awardee **is between $250,000 - $499,999;** may be required to prepare and file a less-extensive financial statement report prepared by an independent accountant.

  - **"High Risk":** amount expended by the awardee **is over $500,000;** entity should provide an independent and in-depth financial statement and audit should be required from the entity.

Annual Reporting

Agencies managing a grant program shall submit a report to the Mayor and the Council by November 1 of each year, containing the following information:

(1) All funds allocated pursuant to a grant program in the previous fiscal year;

(2) The type of services and a timeline for delivery of services for the grant; and

(3) Performance measures and performance outcomes for each grant issued during the previous fiscal year.

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Questions & Feedback