

#### **Game Plan to Grant Resilience**

#### We will:

- Get to know the Region 9 Grants
   Management Division
- Increase your awareness of the most common risk areas
- Learn about available tools & resources
   and how we can work together

#### Topics We'll Discuss:

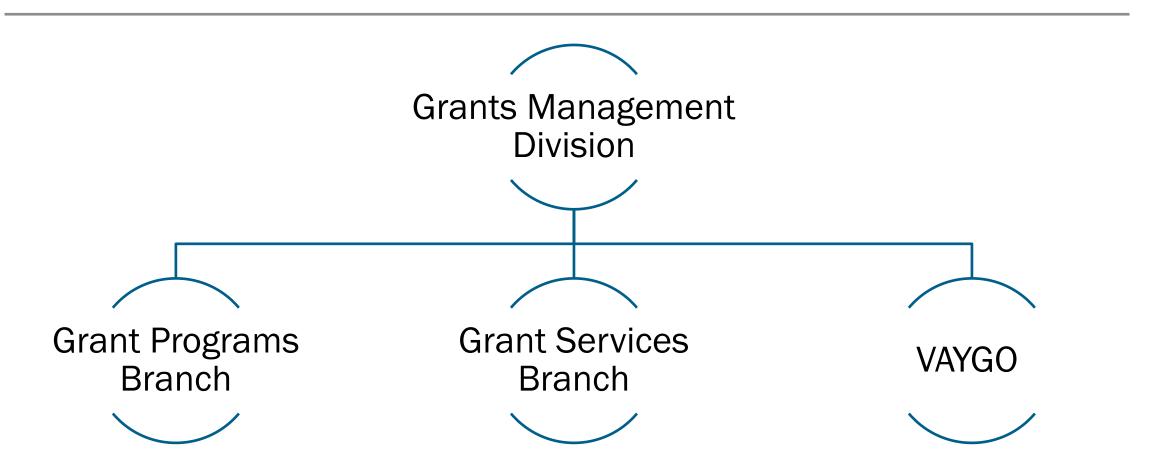
- Our organization and services
- Common grant administration pitfalls and challenges
- Future collaboration





# Who are the Grants Management Division and What we do?

#### Who are the Grants Management Division and what do we do?



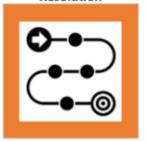


#### What are our primary functions?

Grants & Program
Administration



Audit Resolution



Education & Consultation



Internal Controls



Technical Assistance & Outreach



Monitoring & Compliance

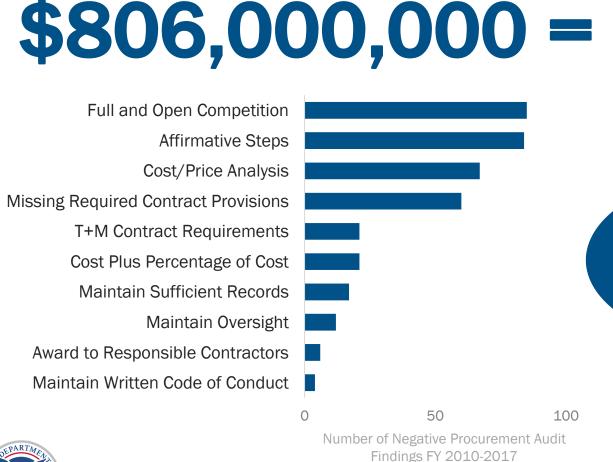






## Common Procurement Pitfalls

#### **Procurement Non-Compliance Is Costly**



Potentially **ineligible contract costs** due to noncompliance with procurement requirements within the **Public Assistance Program** (just one of FEMA's grant programs)

OIG audit reports issued in FY 2010-2017

69% of the negative findings resulted in recommendations to take the funds back

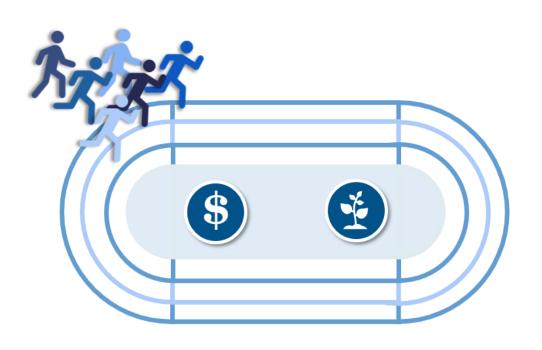






#### **Restricting Full and Open Competition**

- All qualified and responsible sources are eligible to compete without restrictions
- Goal: cast net broadly to reach fair & reasonable price from the most qualified contractor
- Examples of restricting competition:
  - Requiring unnecessary experience
  - Excessive bonding requirements
  - Using brand names
  - Non-competitive contract to contractors on retainer
  - Use of geographic preferences







#### **Engaging in Sole-Sourcing without documenting permissible exceptions**

#### Five Exceptions to Competitive Procurement:

- 1. Micro-purchases (new)
- 2. The item is available only from a single source
- 3. Exigency or emergency circumstance
- 4. Inadequate competition
- 5. Awarding agency or pass-through entity approval









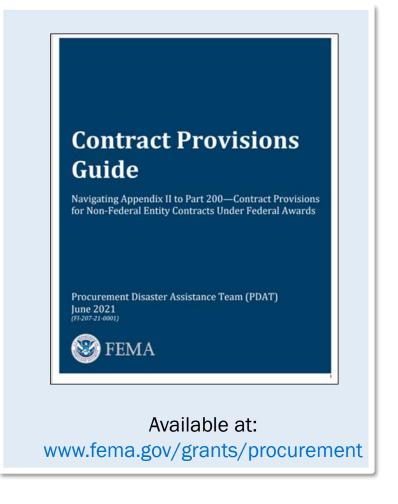
#### Not including the required contract clauses

Contract provisions are required for both **state** and **non-state entities** to protect the interests of:

- The entity conducting the procurement
- Federal government

#### Including, but not limited to:

- Termination for cause and convenience
- Byrd anti-lobbying
- Equal Employment Opportunity (EEO)
- Restrictions
- Changes
- Remedies
- Domestic Preferences (new)
- Telecommunications (new)







### **General Grant Administrative Challenges**

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- Subrecipient Management
- Late Submission of Required Reports
- Costs Incurred without Adequate Source Documentation





#### **General Grant Administrative Challenges - Subrecipient Management**

- Subrecipient Risk Assessments
- Subrecipient Agreements
- Federal Financial Accountability and Transparency Act (FFATA Submission)
- Subrecipient Monitoring





#### **General Grant Administrative Challenges – Late Reports**

- Federal Financial Reports (FFRs)
- Progress Performance Reports (PPRs)
- A-133 Single Audit
- Various Program-Specific Reports





#### **General Grant Administrative Challenges - Costs Incurred**

Costs are most disallowed from grants because of inadequate source documentation.

#### **Examples of Source Documentation**

- Cancelled checks/external source (e.g., financial institution)
- Time and attendance records
- Payroll registers
- Subrecipient award documents
- Receipts
- Invoices and purchase orders
- Executed contracts
- Travel authorization forms/travel vouchers
- Federally approved indirect cost rate agreement
- Fringe benefit rate







#### **Grants Management Division Contact Information**

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### Thank you.

