Managing Your Cooperative Agreement

Funding Opportunity Announcement PS14-1402 AAPPS

Presented by: Sheila Edwards, GMO
Procurement and Grants Office
January 28, 2014

Overview

- **Overview of Grants Management**
  - Roles and Responsibilities
  - Notice of Award
  - Payment Management System (PMS)
  - Budget Guidelines
- **Grantee Prior Approval Requests**
- **Grantee Reporting Requirements**
- **Helpful Reminders**
- **Useful Resources**

OVERVIEW OF GRANTS MANAGEMENT

Purpose of Grants Management

- **To coordinate the business, administration and financial aspects of the federal award**

  Review applications for completeness
  - Review budgets
  - Conduct cost analysis
  - Issue awards
  - Coordinates post award actions

ROLES AND RESPONSIBILITIES

CDC Procurement and Grants Office

- **Business conduit for all program requirements**
  - Ensure compliance with applicable statutes, regulations and policies
  - Serve as the official receipt point for ALL official communications and contacts with awardees
  - Negotiates, awards, administers and closes out all grants and cooperative agreements
  - Reviews and approves all financial requests

CDC Roles and Responsibilities

- **Grants Management Officer (GMO):**
  - ONLY official authorized to 1) require the OPDIV to spend federal funds or 2) change the funding, duration, or other terms and conditions of an award
- **Grants Management Specialist (GMS):**
  - Primary point of contact for grant-related issues, including requests for prior approval, changes in the terms and conditions of award, receiving progress and financial reports, etc.
  - Handles the day-to-day business management (non-programmatic) aspect of grants
- **Project Officer (PO):**
  - Official responsible for the programmatic, scientific, and/or technical aspects of assigned grants

Grantee Roles and Responsibilities

- Develops and implements systems and monitoring procedures to ensure proper stewardship of funds
- Identifies areas of special interest and communicates regularly with the CDC Project Officer
- Tracks progress and submits timely reports
- Accounts for its funds to CDC, and is responsible for sub-grantees and sub-contractors

Grantee Roles and Responsibilities

- **Authorized Organizational Representative (AOR):**
  - Holds authority to act on behalf of the organization
  - Able to sign grant applications
  - Held accountable for the appropriate use of funds awarded and the performance of the grant-supported project or activities
  - Agrees to the terms and conditions
- **Other Accountable Parties:**
  - Principal investigator
  - Program/Project Director
  - Program/Project Coordinator
  - Business/Fiscal Officer
  - Payment Management System Preparer/Approver

NOTICE OF AWARD

Notice of Award

- **Legally binding document issued to the grant recipient**
- **Provides an official commitment of U.S. government funds to grantee**
- **Indicates that funds may be requested from the Payment Management System**
- **Incorporates the following guidance:**
  - FOA
  - Application
  - Budget
  - U.S. government grants guidance
  - U.S. government regulations by reference

Notice of Award

- **Issued for each budget period in the approved project period**
- **A revised NoA may be issued during a budget period to**
  - Make changes to the terms and conditions
  - Respond to prior approval request.
- **A recipient indicates acceptance of an award and its associated terms and conditions by drawing down or requesting funds.**
- **Any costs incurred by the grant recipient prior to the NoA being issued are incurred at their own risk**

Notice of Award

- **A revised NoA is issued whenever PGO:**
  - Approves a change to the budget
  - Approves a change to the duration of support
  - Approves a change to the terms and conditions of the award
  - Lifts a funding restriction
- **If there is not a revised NoA, then the original terms and conditions of the previous NoA remain in effect.**

NOA – Page 2

SECTION I – AWARD DATA – 5H25PS001379-05 REVISED

Award Calculation (U.S. Dollars)

Salaries and Wages	$288,574
Fringe Benefits	$115,430
Supplies	$15,693
Travel Costs	$65,075
Other Costs	$525,480
Consortium/Contractual Cost	$4,829,354
Federal Direct Costs	$5,839,606
Federal F&A Costs	$76,357
Approved Budget	$5,915,963
Federal Share	$5,915,963
Less Unobligated Balance	$502,259
TOTAL FEDERAL AWARD AMOUNT	$5,413,704
AMOUNT OF THIS ACTION (FEDERAL SHARE)	$1,407,876

Fiscal Information:

CFDA Number: 93.977
EIN: 1743204993A1
Document Number: HPS001379A

IC	*CAN*	*2013*
PS	939ZRJQ	$735,850
PS	939ZRLJ	$18,884
PS	939ZRLM	$1,850,099
PS	939ZRRY	$1,726,897
PS	939ZRSA	$1,081,974

SUMMARY TOTALS FOR ALL YEARS		
YR	THIS AWARD	CUMULATIVE TOTALS
5	$5,413,704	$5,413,704

CDC Administrative Data:
PCC: N / **OC**: 4141 / **Processed**: WILLIAMSM0 08/20/2013

SECTION II – PAYMENT/HOTLINE INFORMATION – 5H25PS001379-05 REVISED

For payment information see Payment Information section in Additional Terms and Conditions.

INSPECTOR GENERAL: The HHS Office Inspector General (OIG) maintains a toll-free number (1-800-HHS-TIPS [1-800-447-8477]) for receiving information concerning fraud, waste or abuse under grants and cooperative agreements. Information also may be submitted by e-mail to hhstips@oig.hhs.gov or by mail to Office of the Inspector General, Department of Health and Human Services, Attn: HOTLINE, 330 Independence Ave., SW, Washington DC 20201. Such reports are treated as sensitive material and submitters may decline to give their names if they choose to remain anonymous. This note replaces the Inspector General contact information cited in previous notice of award.

SECTION III – TERMS AND CONDITIONS – 5H25PS001379-05 REVISED

This award is based on the application submitted to, and as approved by, CDC on the above-titled project and is subject to the terms and conditions incorporated either directly or by reference in the following:

a. The grant program legislation and program regulation cited in this Notice of Award.

Changes to Your FY 14 NOA

- Initial 50% Funding: Due to the continuing resolution, 50 percent of the recommended budget is awarded.
- FY14 Awards Number: A new award number is assigned for 5 years. Please provide your award number on ALL correspondence. Please start Email Subject Line with 1402
- Subaccount Document Number: The awards are assigned a subaccount document number. The number is required when drawing down funds from PMS.
- Response to Summary Statement: Summary statements were developed by Reviewers of your application for the new FOA: PS14-1402. A response to weaknesses is due February 1, 2014.
- Reporting Requirements: The reporting requirements for PS14-1402: FFR due March 30, 2015. The Annual Performance Report (APR) is due September 1, 2015. DSTD will provide the format.
- New PGO Grants Management Specialist: Bernadette Cunningham is assigned to several awards. For her assigned awards, contact information will be provided on the approval of the Summary Statement Notice of Award.

PAYMENT MANAGEMENT SYSTEM (PMS)

Requesting Funds

- **Also known as drawing-down funds – <u>Must use subaccount document number.</u>**
- **Request funds needed for immediate use**
  - Can be requested daily – weekly – bi-monthly – monthly
  - PMS can accommodate frequent requests
  - Do not draw down excess funds
  - Do not draw down restricted funds
- **PMS processes request within 24 hours**
  - Allow additional time for international fund transfers
- **If there are any issues contact PMS, not PGO, for assistance.**

Procedures for Requesting Funds

- **Grantee logs-in to PMS to request funds online**
- **Input the required information**
  - Validate PMS contact data
  - Payment request date
  - Expected disbursement amount
  - Cash on hand
  - Payment request amount
  - Formula for payment request
  - Sets forth pertinent information about the grant
- **Contact PMS, not PGO, for assistance**

GRANTEE FINANCIAL MANAGEMENT

Financial Management

- **Grantees must have written policy requirements for financial management (2 CFR 215)**
- **Written policy should include requirements for:**
  - Comprehensive internal controls
  - A financial management system
  - Sub-awards
  - Audits

Financial Management

- **Comprehensive Internal Controls**
  - Program monitoring
    - Planned meetings
    - Site visits
    - Internal audits
  - Accountability assignments
    - Line of authority
    - Tracking system
  - Records maintenance
    - Accounting, procurement and contracts
    - Document, document, document

Financial Management

- **Comprehensive Internal Controls (continued)**
  - Bank accounts
    - Access to draw downs
  - Cash management
  - Payroll
  - Procurement
  - Accounting systems

Financial Management

- **Sub-awards**
  - Grantee is solely responsible for the performance of sub-grantees
    - Grantee should have a plan for financial and program oversight
    - CDC will not get involved in sub-awards
    - CDC may recommend, but not require, sub-awards to specific entities
  - Grant requirements "flow down" to all sub-awards, including applicable cost principles

Financial Management

- **Audits**
  - Required when expenditures are ≥$500,000 annually in U.S. government awards
  - Not required when expenditures are <$500,000 annually in U.S. government awards
    - Grantees are required to make financial records available for CDC review upon request
  - Must be performed by an U.S.-based independent auditor
  - Cost of a required audit is an allowable cost
  - Include the grantee's entire fiscal year, which may be different than the budget period

BUDGET GUIDELINES

Budget Guidelines

- **Overarching Goal**
  - Provide quality and proper stewardship of grants by managing the financial resources of the federal government
- **Primary objectives are to assure that the grantee:**
  - Is eligible to participate in a federally funded program
  - Has all appropriate clearances
  - Proposes costs that are allowable, allocable, and reasonable
  - Has a budget that is complete and properly detailed

Preparing Your Budget

- **In order to prepare a proper budget, it is important to know the following:**
  - the types of costs that are allowable
  - the cost principles to apply
  - differences between direct & indirect costs
- **To assist you in preparing your budget, please follow the template and budget guidelines at:**

http://www.cdc.gov/od/pgo/funding/grants/Budget_Guidelines.doc

GRANTEE PRIOR APPROVAL REQUESTS

Prior Approval Requests

- **Considered post-award actions**
- **Submitted to the assigned GMO/GMS as an original and with two copies**
  - Provide requests electronically in accordance with the terms and conditions in the Notice of Award
- **Always reference the Award # in the request**
- **Must include the signatures of project <u>and</u> authorized business office official, as listed on the Notice of Award.**
- **Will be reviewed by the Grants Management Specialist and the CDC program office**

Prior Approval Requests

- **Examples of requests that require prior approval:**
  - Change in scope (post-award)
  - Change of key staff
  - Change of grantee organization (Bona Fide agent)
  - Contract or consultant agreements
  - Supplemental funds
  - No cost extension
  - Redirection of funds or revised budget
  - Carryover of unobligated funds
  - Release of funding restrictions
  - Clarify on federal regulations and financial aspects of the award

Carryover of Unobligated Funds

- Unobligated funds from the previous budget period requested for use in the next budget period.
- Unobligated funds that are carried over to the next budget period can only be used to pay for activities which will be completed within that specific budget period.
- Requests must express a bona fide need that carryover of funds will contribute to the planned objectives.
- All requests for carryover <u>require prior approval</u> by GMO.

Carryover of Unobligated Funds

- **Request must include:**
  - Current signed and dated Federal Financial Report (FFR) indicating an unobligated balance
  - Reason for unobligated funds from prior year
  - Justification of bona fide need for current year
  - List of proposed activities
  - Description of how funds will enhance current activities
  - Detailed line item budget and justification
  - Timeline/period of performance for proposed activities
  - Signature of project director, principal investigator, and authorized business office official
  - Current indirect cost rate agreement (if requesting indirect costs)

Carryover of Unobligated Funds

- **Submit requests no later than 120 days prior to the end of the budget period specified in the Notice of Award. NO EXCEPTIONS**
- **Suggestions for grantee success:**
  - Work with your financial management officer to get regular statements of obligations or liquidations
  - Submit federal financial reports (FFRs) on time
  - Work closely with your CDC Project Officer (PO) to request carryover of unobligated funds in a timely manner
  - Be sure to monitor your Payment Management System (PMS) subaccounts

Carryover of Unobligated Funds

Cost Categories	Current Approved Budget	Carryover Budget	Revised Award
Salary & Wages	$177,236	$38,354	$215,590
Fringe	$60,535	$10,724	$71,259
Consultants	$7,659	$0	$7,659
Equipment	$0	$0	$0
Supplies	$1,089	$143	$1,232
Travel	$6,560	$0	$6,560
Other	$56,537	$11,559	$68,096
Contracts	$30,000	$10,000	$40,000
Total Direct Costs	$339,616	$70,780	$410,396
Indirect Costs	$31,257	$5,649	$36,906
Total Award	$370,873	$76,429 ****	$447,302

GRANTEE REPORTING REQUIREMENTS

Reporting Requirements

- Performance and Progress Reports
- Federal Financial Reports (FFR) (SF-425 or 425A)
- Federal Funding Accountability and Transparency Act (FFATA) of 2006 Sub-award Reports
- Prevention and Public Health Fund (PPHF) Reports
- Final Inventions Statement and Certification

Performance and Progress Reports

- **Required for all grantees under 45 CFR 92 and 2 CFR 215**
- **Documents programmatic successes and shortfalls**
- **Performance Reports**
  - Annual Performance Reports
    - Submitted within 120 days <u>before</u> the budget period ends
    - At a minimum should include:
      - Budget and spend plans for the next budget period
      - Work plans for the next budget period
    - Additional guidance will be provided by the GMS

Federal Financial Reports (FFRs)

- Also known as SF-425 or SF-425 A
- Include only those funds authorized and disbursed during the budget period covered by the report
- Indicate the exact balance of unobligated funds
- Electronic versions of the form can be downloaded at:
  - http://www.whitehouse.gov/sites/default/files/omb/assets/grants_forms/SF-425.pdf
- Instructions for the form can be downloaded at:
  - http://www.nea.gov/manageaward/FFR-Instructions.pdf

Federal Financial Reports (FFRs) Reporting Dates

- **Interim FFRs**
  - Submitted within 30 days after the end of each calendar quarter
- **Annual FFRs**
  - Submitted within 90 days after the end of the calendar quarter in which the budget period ends
    - For example: Budget Period ends – 1/30/2012
      Calendar quarter ends – 3/31/2012
      Annual FFR due – 6/30/2012
- **Final FFRs**
  - Submitted within 90 days after the project period ends
  - Final FFR must not include unliquidated obligations

Federal Financial Reports (FFRs)

- Effective October 1, 2012, all grantees must submit FFRs through eRA Commons.
- All grantees should have received this letter informing them of the change in reporting requirements.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Centers for Disease Control and Prevention
Procurement and Grants Office (PGO)

Memorandum

Date: October 1, 2012

From: Alan Kotch
Director, CDC Procurement and Grants Office

Subject: Implementation of Federal Financial Report (FFR)

To: Centers for Disease Control and Prevention (CDC) Grantees

The Office of Management and Budget consolidated the Financial Status Report (FSR or SF-269/SF-269A) and the Federal Cash Transaction Report (FCTR or SF-272/SF-272A) into a single form known as the Federal Financial Report (FFR or SF-425/SF-425A). As of October 1, 2012, all CDC Financial Expenditure data must be submitted using the Federal Financial Report (FFR) via the electronic FFR system in eRA Commons. All new submissions should be prepared and submitted as FFRs.

Since January 1, 2010, CDC grantees have been required to report cash transaction data via the Payment Management System (PMS) using the FFR cash transaction data elements. All federal reporting in the Payment Management System (PMS) is unchanged.

The transition to use the FFR for reporting expenditure data includes new reporting dates for annual FFRs, and reporting of cumulative data only. CDC's implementation of the FFR retains a financial reporting period that coincides with the budget period of a particular project. However, the due date for annual FFRs will be 90 days after the end of the calendar quarter in which the budget period ends. Note that this is a change in due dates of annual FFRs and may provide up to 60 additional days to report, depending upon when the budget period end date falls within a calendar quarter. For example, if the budget period ends 1/30/2012, the annual FFR is due 6/30/2012 (90 days after the end of the calendar quarter of 3/31/2012). Due dates of final reports will remain unchanged. The due date for final FFRs will continue to be 90 days after the project period end date.

Instructions for CDC Grantees for the FFR are now available at http://grants.nih.gov/grants/forms.htm. Additional resources concerning the eFSR/FFR system, including a User Guide and an on-line demonstration, can be found on the eRA Commons Support Page: http://www.cdc.gov/od/pgo/funding/grants/eramain.shtm.

General questions concerning using the eRA Commons should be directed to the eRA Commons Helpdesk at: eRA Commons Help Desk Web : http://ithelpdesk.nih.gov/eRA/.

If you have additional questions or concerns about the FFR, please contact your Grants Management Specialist.

Thank you for your assistance in implementing this new requirement.

FFATA Sub-award Reporting

- **A FFATA sub-award report is required when all of the following are met:**
  - A new award was made on or after October 1, 2010,
  - A grantee received ≥$25,000, and
  - A grantee made a sub-award of ≥$25,000.
- **FFATA sub-award reports are required to be submitted by the end of the month following the month in which the sub-award was made.**
  - Example: If the sub-award was made on February 12, then the FFATA sub-award report is due no later than March 31.
  - Submit reports to www.fsrs.gov

FFATA Sub-award Reporting

- **FFATA sub-award reports include, but are not limited to:**
  - Name of the sub-grantee organization
  - Amount of the sub-award
  - Information on the sub-award, including transaction type, funding agency, etc.
  - Location of the sub-grantee receiving the sub-award
  - A unique identifier of the sub-grantee receiving the sub-award
  - Names and compensation of highly-compensated officers (as applicable)

HELPFUL REMINDERS

Helpful Reminders

- **Read entire Notice of Award particularly the Terms and Conditions.**
- **Approach cooperative agreements as collaborations.**
- **Maintain regular communication with PGO and Program Consultant.**
  - Utilize e-mail header: Grant (Organization) (Award #)
  - Respond to CDC communications promptly
- **Submit reports in a timely fashion.**
- **Principal Investigator/Project Director and authorized Business Office Official signatures are required for all grantee correspondence.**

Helpful Reminders

- **Attend CDC trainings to learn more about grant requirements.**
- **Financial management reminders**
  - Maintain separate account for grant funds.
  - Document financial management and budget procedures.
  - Request funds draw down as needed to meet expenses.
  - Do not keep large amounts of cash on hand.
  - Minimize cash transactions where possible.
- **Always ask your GMS if in doubt.**

USEFUL RESOURCES

Useful Resources

- **HHS General Grants Information**
  - Web: http://dhhs.gov/asfr/ogapa/aboutog/grantsnet.html
- **HHS Grants Policy Statement**
  - Web: http://dhhs.gov/asfr/ogapa/grantinformation/hhsgps107.pdf
- **2 Code of Federal Regulations, Grants and Agreements**
  - Web: http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title02/2cfr225_main_02.tpl
- **45 Code of Federal Regulations Part 92 (State, Local and Tribal Governments)**
  - Web: http://www.hhs.gov/opa/grants/toolsdocs/45cfr92.pdf

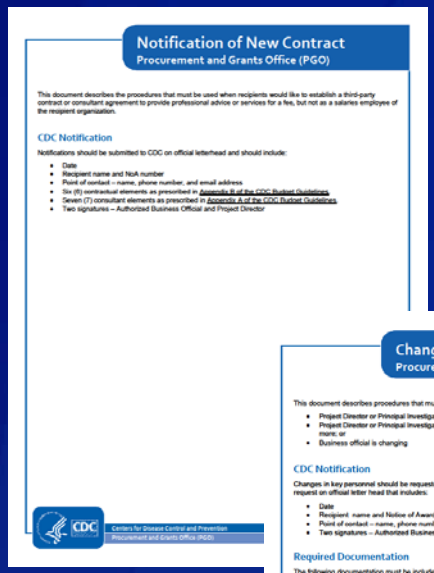
Useful Resources

- **OMB Circulars**
  - Web: http://www.whitehouse.gov/omb/circulars_default
  - A-21: Cost Principles for Educational Institutions
  - A-87: Cost Principles for State, Local and Indian Tribal Governments
  - A-102: Grants and Cooperative Agreements with State and Local Governments
  - A-122: Cost Principles for Non-Profit Organizations
  - A-133: Audits of States, Local Governments and Non-Profit Organizations
- **Budget Guidelines**
  - Web: http://www.cdc.gov/od/pgo/funding/grants/foamain.shtm
- **Various Forms (including SF-425, etc.)**
  - Web: http://www.whitehouse.gov/omb/grants/grants_forms.html

Useful Resources

- **CDC Grantee's Financial Reference Guide**
  - Web: http://www.cdc.gov/od/pgo/funding/grants/policymain.shtm
- **CDC official website**
  - Web: http://www.cdc.gov
  - Web: http://www.cdc.gov/about/business/funding.htm (PGO's home page)
- **Grants.gov Application Assistance**
  - Contact PGO TIMS: (770) 488-2700

Useful Resources
Prior Approval Request Templates



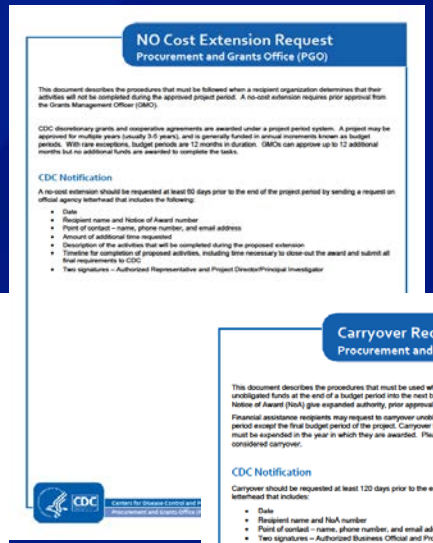
Notification of New Contract
Procurement and Grants Office (PGO)

This document describes the procedures that must be used when recipients would like to establish a third-party contract or consultant agreement to provide professional advice or services for a fee, but not as a salaries employee of the recipient organization.

CDC Notification

Notifications should be submitted to CDC on official letterhead and should include:

- Date
- Recipient name and NoA number
- Point of contact – name, phone number, and email address
- Six (6) contractual elements as prescribed in Appendix B of the CDC Budget Guidelines
- Seven (7) consultant elements as prescribed in Appendix A of the CDC Budget Guidelines
- Two signatures – Authorized Business Official and Project Director



NO Cost Extension Request
Procurement and Grants Office (PGO)

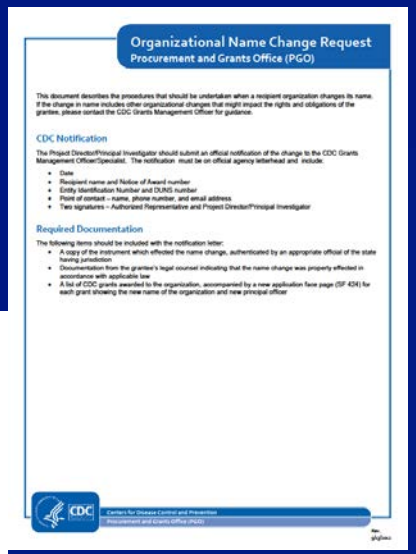
This document describes the procedures that must be followed when a recipient organization determines that their activities will not be completed during the approved project period. A no-cost extension requires prior approval from the Grants Management Officer (GMO).

CDC discretionary grants and cooperative agreements are awarded under a project period system. A project may be approved for multiple years (usually 3-5 years), and is generally funded in annual increments known as budget periods. With rare exceptions, budget periods are 12 months in duration. GMOs can approve up to 12 additional months but no additional funds are awarded to complete the tasks.

CDC Notification

A no-cost extension should be requested at least 90 days prior to the end of the project period by sending a request on official agency letterhead that includes the following:

- Date
- Recipient name and Notice of Award number
- Point of contact – name, phone number, and email address
- Amount of additional time requested
- Description of the activities that will be completed during the proposed extension
- Timeline for completion of proposed activities, including time necessary to close-out the award and submit all final requirements to CDC
- Two signatures – Authorized Representative and Project Director/Principal Investigator



Organizational Name Change Request
Procurement and Grants Office (PGO)

This document describes the procedures that should be undertaken when a recipient organization changes its name. If the change in name includes other organizational changes that might impact the rights and obligations of the grantee, please contact the CDC Grants Management Officer for guidance.

CDC Notification

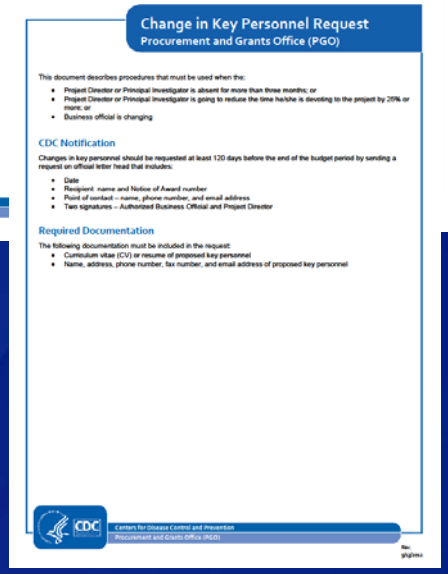
The Project Director/Principal Investigator should submit an official notification of the change to the CDC Grants Management Officer/Specialist. The notification must be on official agency letterhead and include:

- Date
- Recipient name and Notice of Award number
- Entity identification Number and DUNS number
- Point of contact – name, phone number, and email address
- Two signatures – Authorized Representative and Project Director/Principal Investigator

Required Documentation

The following items should be included with the notification letter:

- A copy of the instrument which effected the name change, authenticated by an appropriate official of the state having jurisdiction
- Documentation from the grantee's legal counsel indicating that the name change was properly effected in accordance with applicable law
- A list of CDC grants awarded to the organization, accompanied by a new application face page (SF 424) for each grant showing the new name of the organization and new principal officer



Change in Key Personnel Request
Procurement and Grants Office (PGO)

This document describes procedures that must be used when the:

- Project Director or Principal Investigator is absent for more than three months; or
- Project Director or Principal Investigator is going to reduce the time he/she is devoting to the project by 25% or more; or
- Business official is changing

CDC Notification

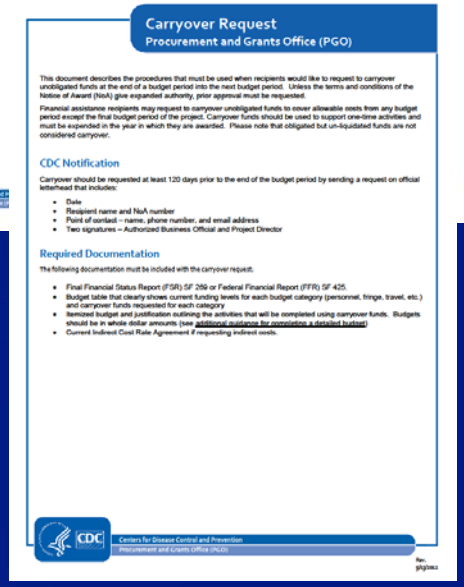
Changes in key personnel should be requested at least 120 days before the end of the budget period by sending a request on official letter head that includes:

- Date
- Recipient name and Notice of Award number
- Point of contact – name, phone number, and email address
- Two signatures – Authorized Business Official and Project Director

Required Documentation

The following documentation must be included in the request:

- Curriculum vitae (CV) or resume of proposed key personnel
- Name, address, phone number, fax number, and email address of proposed key personnel



Carryover Request
Procurement and Grants Office (PGO)

This document describes the procedures that must be used when recipients would like to request to carryover unobligated funds at the end of a budget period into the next budget period. Unless the terms and conditions of the Notice of Award (NoA) give expanded authority, prior approval must be requested.

Financial assistance recipients may request to carryover unobligated funds to cover allowable costs from any budget period except the final budget period of the project. Carryover funds should be used to support one-time activities and must be expended in the year in which they are awarded. Please note that obligated but un-liquidated funds are not considered carryover.

CDC Notification

Carryover should be requested at least 120 days prior to the end of the budget period by sending a request on official letterhead that includes:

- Date
- Recipient name and NoA number
- Point of contact – name, phone number, and email address
- Two signatures – Authorized Business Official and Project Director

Required Documentation

The following documentation must be included with the carryover request:

- Final Financial Status Report (FSR) SF 269 or Federal Financial Report (FFR) SF 425.
- Budget table that clearly shows current funding levels for each budget category (personnel, fringe, travel, etc.) and carryover funds requested for each category
- Itemized budget and justification outlining the activities that will be completed using carryover funds. Budgets should be in whole dollar amounts (see additional guidance for completing a detailed budget)
- Current Indirect Cost Rate Agreement if requesting indirect costs.

http://www.cdc.gov/od/pgo/funding/grants/policymain.shtm

Thank You