

Grant File Management: Guide & Best Practices

The purpose of this guide is to provide information and best practices on how to create and maintain a comprehensive grant file throughout the entirety of the grant lifecycle.¹ Maintaining an organized and inclusive grant file can minimize grantee risk while improving the efficiency of grant-related activities, such as reporting and information requests. As part of diligent record keeping, grantees should establish clear roles and responsibilities for the grant file, develop an organized grant file structure, and implement the best practices noted in this guidance.

This guide is for informational purposes only and is intended solely to assist grant recipients in better understanding their grant and the requirements set forth in the award terms and conditions for their respective program. This guide does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific requirements set forth in the terms and conditions of a grant award. In all cases, statutory and regulatory mandates, and the requirements set forth in the terms and conditions of a particular grant award, shall prevail over any inconsistencies contained in this guidance.

Identify Grant File Management Roles

GRANTEE			FEDERAL	
Program Manager	Authorized Organization Representative	Grant Coordinator	Federal Program Officer	NIST Grant Specialist
Responsible for documentation and compliant record keeping	Official authorized to submit or sign documents on behalf of the grantee	Document and maintain files for project activities, sub-grantees, & stakeholders	- Provide technical support for NTIA grant programs - May request grant files as part of oversight and monitoring	- POC for grant agreement and modifications - May request grant files as part of oversight and monitoring

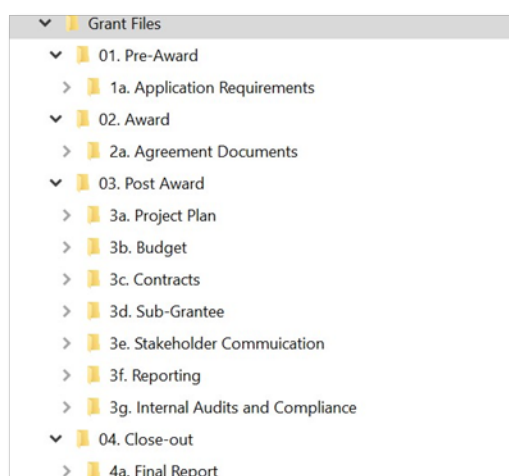
Figure 1: Grant File Management Responsibilities by Role

¹ The grant lifecycle includes pre-award, award, post-award, and closeout. Note, per § 2 CFR 200.334, Federal grantees must retain records for a minimum period of three years post-closeout; the National Telecommunications and Information Administration (NTIA) and National Institute of Standards and Technology (NIST) will provide a timely and reasonable notice to the grantee for any information requests.

As noted in **Figure 1**, grant grantees should establish grant file management roles with clear and identifiable duties. Delineating these roles will help ensure task responsibility and effective grant file maintenance, ultimately reducing the risk of misplaced or unsaved information. As a precaution, access to grant files should be only given to individuals with clearly designated roles.

Develop a Grant File Structure

To ensure compliance with grant award requirements, grantees should establish a grant file that accounts for all four phases of the grant lifecycle: pre-award, award, post award and close-out.



The file structure presented in **Figure 2** offers an easy and methodical way to track and maintain records for each phase of grant activity. Within each grant lifecycle phase folder, grantees can create subfolders to organize relevant materials. **Table 1** provides sample subfolders and a list of corresponding recommended documents to file.

Table 1. Grant Document Organization by Subfolder and Document

Phase	Subfolder	Recommended Documents to File
Pre-Award	Application Requirements	Letter of Intent, SF-424, SF-424C, CD-511, SF-LLL, Budget Narrative, Detailed Budget Justification, Project Narrative, Negotiated Indirect Cost Rate Agreement
Award	Agreement Documents	Notice of Award, partnership/cooperative/intermunicipal agreements, written determinations, or pre-approvals, subawards

Post Award	Project Plan	Project plan, other planning documents
	Budget	Initial budget, budget amendments, funding award letters, records supporting all cost charges to the award, procurement records
	Contracts	Procurement files, contracts, modifications, invoices
	Sub-Grantee	Sub-grantee related award agreements, procurement files, project plans, reports, invoices, contracts, modifications
	Stakeholder Communication	Communications, meeting agendas, meeting notes, flyers, other outreach material
	Reporting	Initial Report, Semi-Annual Report; evidence of program accomplishments
	Internal Audits & Compliance	Audit reports, findings reports, Corrective Action Plans, follow-up records
Closeout	Final Report & Additional Materials	Final performance report and closeout letter, record of reconciliation, property disposition forms

Best Practices for Grant File Management

When maintaining a grant file, grantees should ensure they comply with their respective internal record-keeping requirements as well as those outlined in 2 CFR 200, Notice of Funding Opportunity, and award terms and conditions. **Figure 3** provides best practices in managing project documents and maintaining report records.

Project Documents	Reports
- Develop a naming convention for files that includes a brief descriptive title, date and/or version number - Establish version control protocols to limit document duplication - Maintain working documents in original format (e.g., .doc), and use a separate 'Archive' folder to capture outdated versions - Save or scan final documents in PDF	- Develop a format for internal activity progress reports that aligns to NTIA reporting requirements - Ensure all reports are appropriately signed and dated prior to filing - Ensure all subcontractor reports are received and filed appropriately - Clearly label and file deliverables and reports (both internal/external),

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| <ul style="list-style-type: none">• Ensure documents that require signature are signed and dated by appropriate parties prior to final upload• File all plans, permits, certifications, and validations with the corresponding project• Maintain final and fully executed copies of contracts, agreements, letters, etc. | <p>including respective activity and reporting period</p> <ul style="list-style-type: none">• Save confirmation of document transmission to external parties (submission/receipt), including time and date• Perform regular internal and subcontractor audits to ensure documentation compliance, traceability, and risk mitigation |
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Figure 2: Best Practices for Grant File Management