

Grants Administration 101



Disclaimer

This document is intended solely to assist recipients in better understanding Office of Internet Connectivity and Growth (OICG) grant programs and the requirements set forth in the Notices of Funding Opportunity (NOFOs) for the respective OICG programs. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the program NOFOs. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFOs, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

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Today's Goals

1. Understand the grants lifecycle and how a grant is created.
2. Understand the applicable statutory, regulatory, and administrative policies and procedures that govern federal grants.
3. Explore common grants administration topics and how they relate to the Infrastructure Investment and Jobs Act (IIJA) and Consolidated Appropriations Act (CAA) grant programs administered by the Department of Commerce (DOC) National Telecommunications and Information Administration (NTIA).

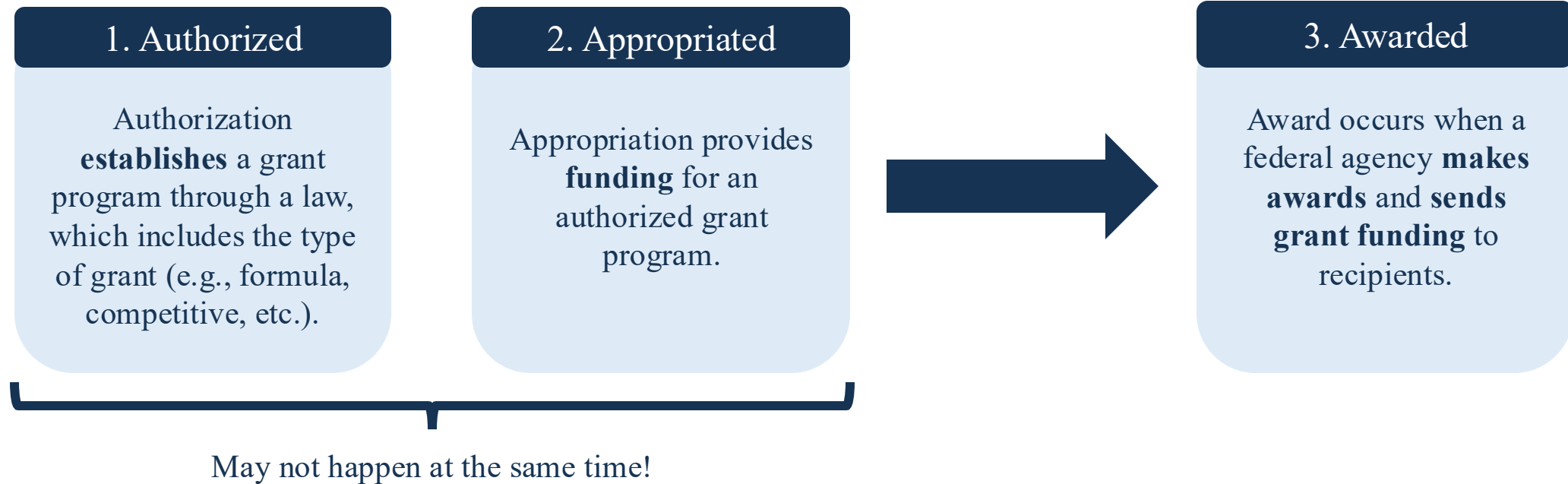


Grants 101

What Is a Grant?

A grant is a form of **federal financial assistance** which provides funding to a recipient to carry out public services and/or specific goals identified in a law. Unlike a loan, **no repayment is required**.

HOW ARE GRANTS CREATED?

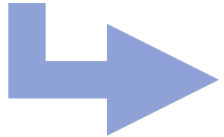


Grant Lifecycle

There are **four unique stages** to the federal grant lifecycle, each with specific grants administration activities.

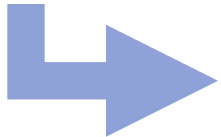
1 PRE - AWARD

- Includes: Notice of Funding Opportunity (NOFO) announcement, application submission, and application review



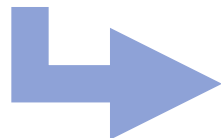
2 AWARD

- Includes: Notice of Award (NOA), standard award conditions



3 POST-AWARD

- Includes: Implementation, monitoring, reporting, records retention



4 CLOSEOUT

- Includes: Final financial and programmatic reporting, return of any remaining funds

Terminology

Federal, state, local, Tribal, and territorial governments often use **different grant terms** that have the same meaning. These terms, for the most part, **can be used interchangeably**.

Recipient	=	Grantee/Awardee
Subgrant	=	Subaward
Subgrantee	=	Subrecipient
Subrecipient	≠	Subcontractor

For more about the differences between subrecipients and subcontractors, please see [Subrecipient vs. Subcontractor 101](#)

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Grants Administration Overview

What Makes Up Grants Administration?

Grants administration is comprised of several **programmatic** and **financial** activities that typically can be broken down into three categories.

Policies & Procedures

- Provides the “rules” governing the grant
- Details allowable vs. unallowable costs
- Provides standards for activities like reimbursement requests, revision requests, etc.

Monitoring & Oversight

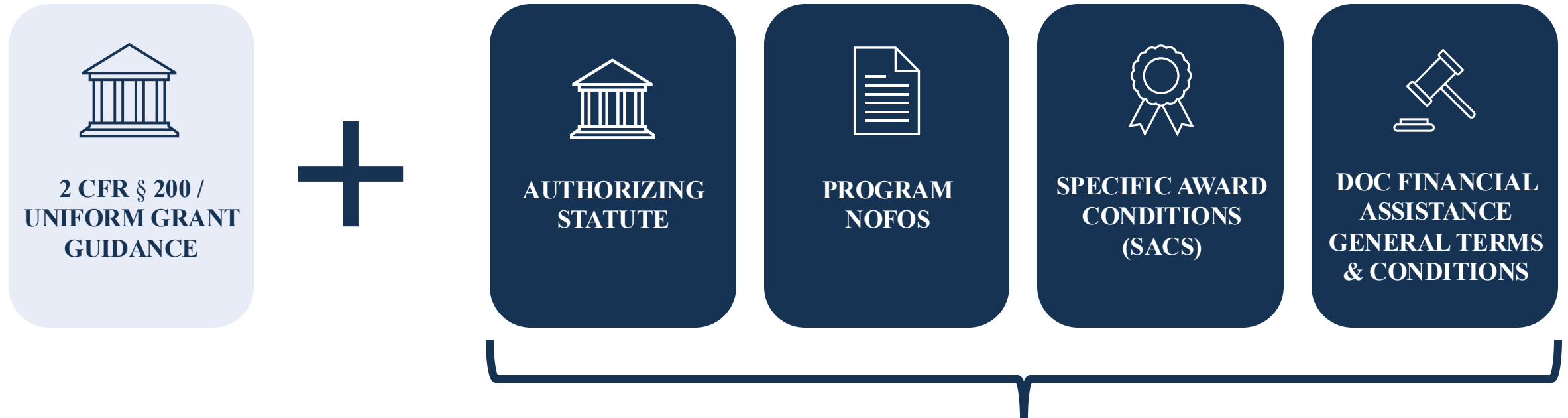
- Includes activities that monitor financial and programmatic progress of the grant
- Ensures federal funds being spent are allowable, allocable, and reasonable

Reporting Compliance

- Includes standard Federal Financial Reports (SF-425) and programmatic reporting
- May also include program specific milestones and/or reporting requirements

Who Decides the Rules?

All federal grants must operate under the Uniform Guidance. However, federal grants may also have **additional administration requirements** that are unique to each program.



Contains additional grants administration requirements.

Specific Award Conditions are outlined in the Notice of Award (NOA). Please review your Program Specific NOFO and NOA thoroughly.

What Is the Uniform Guidance?

Title 2 of the Code of Federal Regulations Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), also known as the Uniform Guidance, provides a governing set of standards applicable to all federal grants for compliance.

The Uniform Guidance:

- Was created to **streamline** various, separate federal financial assistance policies into one cohesive rule set that all agencies and recipients must follow
- Establishes **requirements for all stages of the grants management lifecycle** (for both the federal granting agency and recipients)
- Establishes a set of **cost principles** for determining allowable costs incurred by federal grant recipients
- Provides federal agencies with policies for **collecting and submitting information** on federal financial assistance programs to the Office of Management and Budget (OMB) and the public



When creating internal grants administration policies and procedures, recipients should review the Uniform Guidance for core requirements, regulations, and expectations.

Why Is Grants Administration Important?

Effective grants administration activities are crucial in protecting against fraud, waste, and abuse and in ensuring compliance with federal regulations. Recipients are responsible for ensuring those funds are used appropriately and responsibly.

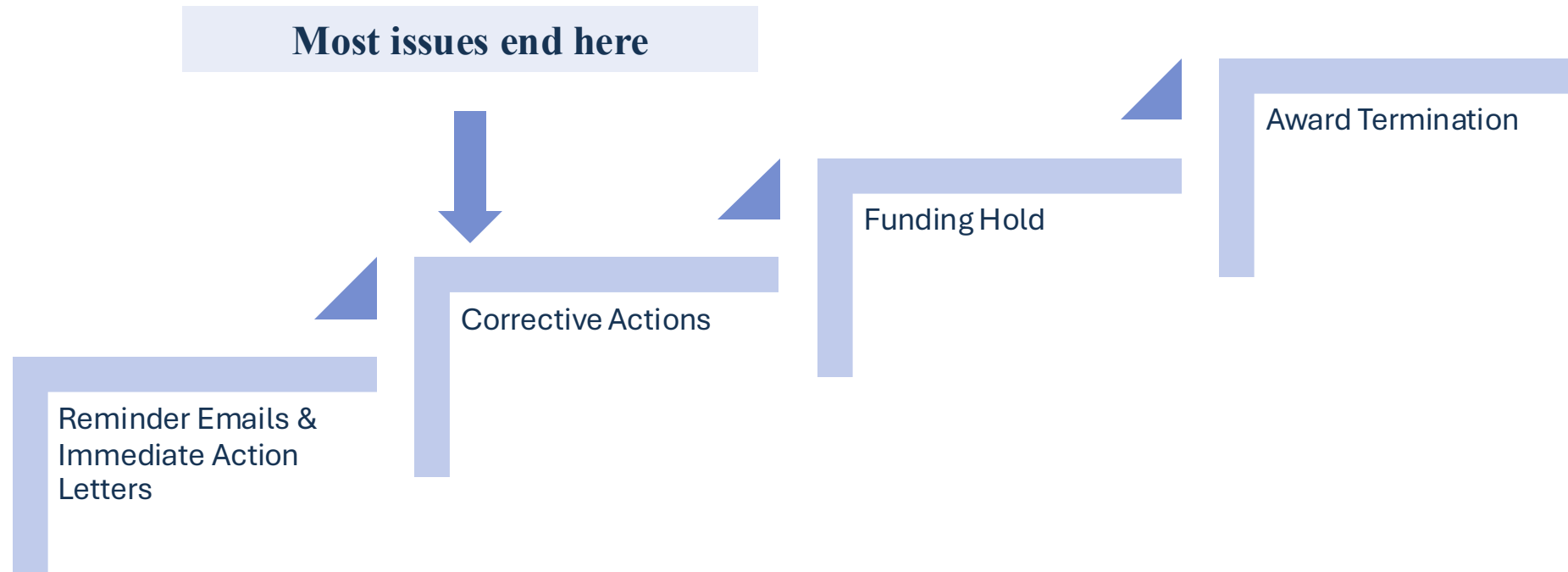


Federal funds come from taxpayer dollars, so it's important to make sure recipients use the money responsibly, follow the rules, and deliver the intended results.

Note: Recipients may be required to return the funds if they use them for unallowable costs or ineligible activities, fail to comply with grant terms and conditions, do not meet performance goals, or if an audit reveals mismanagement or misuse of funds. Additionally, repayment may be necessary if there are findings of waste, fraud, or abuse, or if the grant is terminated by the federal agency.

How Is Grants Administration Enforced?

Grants administration enforcement **falls on a spectrum** and can include a variety of activities.



Note: Enforcement strategies also depend on how the **authorizing law** and **NOFO** were written.

Key Federal Roles & Responsibilities

While NTIA administers IJJA and CAA programs, the administration also partners with several federal agencies to assist in grants management.

- NTIA partners with the National Institute of Standards and Technology (NIST) to manage IJJA and CAA grant activities.
- Through the NIST partnership, recipients use the U.S. Department of Treasury's Automated Standard Application for Payments (ASAP) system to draw down funds.

Federal Program Officers (FPOs)	NIST Grants Officers and Grants Specialists
✓ Monitor and oversee work conducted under an award, compare the actual accomplishments with the goals and objectives established in the award	✓ Oversee the financial management and administrative aspects of grants
✓ Provide programmatic guidance and technical assistance to recipients	✓ Ensure that each award complies with applicable statutes, regulations, Uniform Guidance, Executive Orders, and DOC policies
✓ Review and evaluate reports, including financial, performance, and technical for consistency with the approved project	✓ Ensure recipient's compliance with SACs
	✓ Approve awards and amendments

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Policies & Procedures

Policies and Procedures Overview

Established and approved policies and procedures are fundamental to grants management as they create a consistent understanding of expectations between NTIA, recipients, and subrecipients.

Examples of policies and procedures may include:

- Procurement Policy
- Record Retention Policy
- Subrecipient Selection Policy
- Subrecipient Monitoring Policy
- Time Tracking Policy
- Fraud, Waste, and Abuse Policy
- Payroll Policy



Effective grants administration involves developing policies and procedures for both **internal** (e.g., internal controls) and **external** (subrecipients monitoring) use.

Policies and Procedures Compliance

Documented policies, processes, and procedures not only support program objectives, but also help ensure the recipient is compliant with federal requirements.

Federal Requirements Can Include:



Allowability, Allocability, and Reasonability

Policies and procedures must ensure that recipient costs are allowable, allocable, and reasonable as defined in [2 CFR 200 Subpart E](#).



Environmental & National Historic Preservation

Environmental regulations stated in the award conditions, and within their timeframes, must be fulfilled. This includes meeting the National Environmental Policy Act (NEPA) review, which can require an Environmental Assessment (EA).



Build America, Buy America Act

Policies and procedures should ensure compliance with the Build America, Buy America (BABA) Act, which established a domestic content procurement preference for all federal financial infrastructure assistance obligated after May 14, 2022. The Buy America preference requires that all iron, steel manufactured products, and construction materials used in covered infrastructure are produced in the United States.

Creating a Grant File

Maintaining an organized grant file can minimize grantee risk while improving the efficiency of grant-related activities, such as reporting and information requests.



Why Is Documenting Policies and Procedures Important?

- Documenting policies and procedures is **required** by Uniform Guidance ([2 CFR 200 Subpart D](#)).
- Proper policy documentation allows for an **effective compliance management** system that maintains consistency throughout the grant's lifecycle.
- Documenting processes helps prepare a grantee for **potential audits** where historical decisions need to be explained.
- Organized and documented policies help recipients quickly and easily provide requested documents to NTIA during **monitoring**.

Grant Files
01. Pre-Award
1a. Application Requirements
02. Award
2a. Agreement Documents
03. Post Award
3a. Project Plan
3b. Budget
3c. Contracts
3d. Sub-Grantee
3e. Stakeholder Communication
3f. Reporting
3g. Internal Audits and Compliance
3h. Policies & Procedures
04. Close-out
4a. Final Report



Monitoring & Oversight

Monitoring Outcomes

FPOs conduct monitoring and oversight throughout the grant lifecycle to help recipients comply with Federal regulations and grant terms, and to avoid or correct any potential issues.

The benefits and intended outcomes of effective grant monitoring and oversight include:



Recipients **comply with the terms and conditions** of the award incorporated in the Notice of Award, including any SACs, amendments, and applicable laws and regulations;



Recipients **implement projects on schedule** and make adequate progress towards achieving identified metrics, milestones, goals, objectives, and planned outcomes;



Recipients **meet financial and programmatic reporting requirements**, adhere to submission deadlines, and provide accurate information;



Recipients **expend federal funds** as authorized within the period of performance; and



Recipients **mitigate the potential for fraud, waste, and abuse.**

Types of Monitoring Activities

Monitoring for each grant program—happening quarterly, annually, or on an ad hoc basis—may include site visits, desk reviews, conference calls, and other activities, depending on risk level.



Conference Call

Conference calls are audio or video calls between FPOs and recipients that serve to check on project progress, conduct ongoing assessments, and/or mitigate any issues.



Focused Desk Review

A focused desk review is a detailed evaluation of a specific area of grant performance, typically conducted by examining programmatic, administrative, and/or compliance-related documentation provided by the recipient.

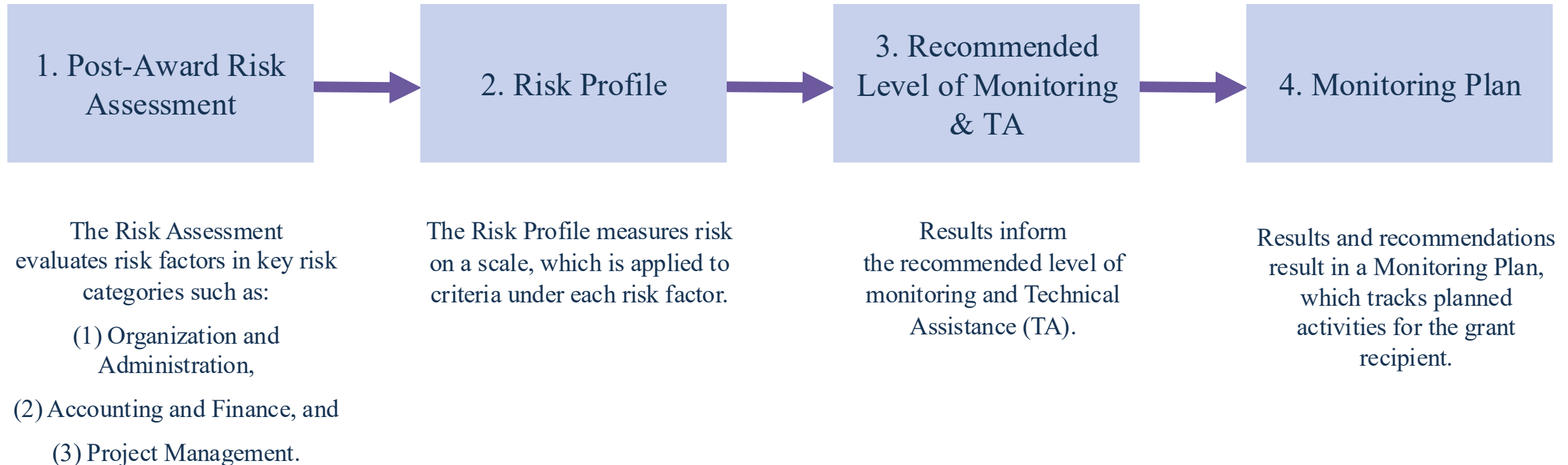


Site Visit

Site visits are assessments of a recipient conducted by FPOs in the location(s) where grant-funded recipient activities are performed (or virtually via phone or video conference), as approved by Program leadership.

How Does NTIA Determine Monitoring?

The following chart represents how OICG determined monitoring levels for recipients, which is a **common model** used across many grant programs.



Grant Monitoring vs. Auditing

NTIA and the Grants Officer monitor grants, and audit when applicable, to ensure compliance with federal regulations and grant terms to avoid and correct any potential issues.



Monitoring

- Includes both fiscal compliance and programmatic performance, through tools such as technical assistance, and is intended to guide recipients in best practices.
- Occurs on a regular basis. Recipients are typically notified of monitoring activities in advance.

Types of activities reviewed during a site visit or desk review include:

- Organizational structure and governance
- Contracts, subrecipient, and procurement policies
- Financial management policies and procedures
- Programmatic activities



Auditing

- Is solely focused on fiscal compliance and not concerned with whether the program achieves its goals, the impact on end users, or the strategic value of one type of expenditure vs. another.
- Entities that expend \$1,000,000 or more in Federal funding during the non-Federal entity's fiscal year are subject to the audit requirements in 2 CFR 200 Subpart F or the audit requirements in the grant terms and conditions.

Types of activities reviewed during an audit include:

- Financial statements
- Internal controls for accounting



Reporting

Reporting Overview

Reporting is vital because it allows NTIA to track progress and identify where to provide technical assistance, as needed. Reporting is a compliance requirement laid out in 2 CFR § 200 and NOFOs.

WHY IS REPORTING IMPORTANT?



Helps NTIA Track
Progress



Allows NTIA to Identify Needs
for Technical Assistance



Required for Compliance

Common Types of Reports

Recipients are required to provide information via a variety of reporting methods. While reporting methods vary from program to program, some types of reports are commonly used.



Pre-Award Forms

Several standard, government-wide forms are often required to be submitted along with program specific documents. These include, but are not limited to, the SF-425 (Federal Financial Report), CD-511 (Lobbying Certification), and others.



Semi-Annual Report

Unique to each specific program, Semi-Annual Reports (SARs) may assess for progress against programmatic milestones as well as financial information. While exact timing varies, SARs are collected every six months.



Annual Report

Assessing similar information and metrics as SARs, Annual Reports may be more exhaustive in scope and are submitted annually. Annual Reports may assess performance across the grant year.



Final Closeout Reports

Within 120 days of the end of an award's period of performance, recipients must submit all final financial and programmatic reports to their awarding agencies. Final Closeout Reports may utilize the SF-425 in addition to other program-specific documents.

Authorized Organization Representative

An Authorized Organization Representative (AOR), sometimes also referred to as the Signing Official, is a member of an organization that has signatory authority for all official grant documents.

What is an Authorized Organization Representative?

- An AOR is responsible for signing on all aspects of a grant application and award, including applications, monitoring, reporting, and closeout.
- These individuals are considered key personnel; as such, both NTIA and the applicable Grants Officer must be informed of any changes as soon as possible.
- Note: There is no need to wait for regular reporting or monitoring to submit an AOR change.



An AOR's signatory authority role is critical throughout the grant lifecycle, from pre-award through semi-annual reports to close out. Their engagement and understanding of the application, as well as the progress of the awarded grant, is vital for everyone involved.

NTIA Internal Reports

NTIA may derive their own reports based off recipient data. For example, NTIA regularly looks at reimbursement requests or drawdowns (aka the amount of money a recipient has spent) to track the health of the grant award.

1

Drawdown All or Most Funds

**2**

Drawdown Some Funds

**3**

Drawdown No Funds





Applicant Preparation

Applicant Preparation

For open grant opportunities, interested applicants can read the NOFO, check their eligibility, register on required platforms, collect required documentation, and sign-up for the NTIA newsletter to keep up with regular updates.



Check Application Eligibility

- ❑ Visit **BBUSA.gov** and review the NOFO to learn more about the program and determine eligibility.
- ❑ Visit **Grants.gov** or **SAM.gov** to determine eligibility if a NOFO has not been released.



Register on Required Platforms ASAP!

- ❑ **SAM.gov** : Your entity must be registered and active to receive a *Unique Entity Identifier (UEI)*.
- ❑ **Grants.gov** : Your entity must create or confirm an active account.
- ❑ **eRA Commons**: Your entity must complete a one-time registration.



Sign-up for the NTIA Newsletter!

- ❑ **Subscribe to the BBUSA Newsletter** to keep up with regular updates!



Thank You!

