



Health Profession Opportunity Grants

OFFICE OF FAMILY ASSISTANCE

Post-Award Administration

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Workshop Goals

- To review key authorities that govern HPOG
- To review key components of the NoA
- To introduce participants to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”)
- To review subsections of the guidance and key information

Workshop Goals cont'd

- To identify types of post-award changes requiring prior approval
- To provide internet links to grant resources

Key Authorities Governing HPOG

- Authorizing Legislation
- Code of Federal Regulations: 45 CFR Part 75
- HHS Grants Policy Statement
- Funding Opportunity Announcement
- Notice of Award
- Cooperative Agreement
- Guidance Documents (e.g., FAQs)

Key Components of the NoA

- Project Period – The total time for which support of a discretionary grant or cooperative agreement has been approved.
- Budget Period – The interval of time into which the project period is divided for budgetary and funding purposes.
- Approved Budget – Final expenditure plan for the grant and includes Federal and Non-Federal Shares
- Remarks Section – Award Terms and Conditions and Other Requirements, Grant Restrictions, Cooperative Agreement and Award Package
 - Three primary sections – Standard Terms, Award Conditions and Contacts

Reporting Requirements

- Programmatic Reporting
 - ACF Performance Progress Report (SF-PPR)
 - Complete and Accurate Reporting
 - Used to verify grantee carryover request
- Financial Reporting
 - Federal Financial Report (SF-425)
 - Submitted in GrantSolutions (GS) and PMS
 - Semi-annual in GS; Quarterly in PMS
- Annual Reporting
 - SF-425, Tangible Personal Property (SF-428) & Real Property Status Report (SF-429)
 - Necessary for budget period closeout
 - Due 90 days after the Budget Period End Date

Uniform Guidance

- Now contained in 45 CFR Part 75
- Replaces 45 CFR Parts 74 and 92, OMB A-21, A-87, A-122 and A-133
- Is divided into six parts
- Order of Precedence
- Refer to the full text of the regulation or contact your Federal contacts if you have questions

45 CFR Part 75

- Subpart A: Acronyms and Definitions
- Subpart B: General Provisions
- Subpart C: Pre-Federal Award Requirements and Contents of Federal Awards
- Subpart D: Post Federal Award Requirements
- Subpart E: Cost Principles
- Subpart F: Audit Requirements
- Appendices

Subpart A: Acronyms and Definitions

- Key Definitions:
 - Non-Federal Entity - Includes all entity types
 - Micro-Purchase – purchase of supplies or services using simplified acquisition procedures
 - Performance Goal – Performance expressed as a tangible, measureable objective, against which actual achievement can be compared
 - Contract – Legal instrument used to purchase property or services to carryout the Federal award

Subpart A: Acronyms and Definitions cont'd

- Key Definitions continued:
 - Contractor – An entity that receives a contract from non-Federal entity to purchase property or services to carry out the project or program of a Federal award
 - Subaward – An award provided by a pass-through entity to a subrecipient
 - Pass-through – Non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program
 - Subrecipient – non-Federal entity that receives a subaward from a pass-through entity

Subpart D: Post Federal Award Requirements

- 75.302, Financial Management and Standards for financial management systems
 - Retention, Methods of Transfer, Transmission and Storage of Information
 - Identification of all Federal Awards Received and Expended
 - Accurate, Current and Complete Disclosure of Financial Results
 - Records that Identify Source and Applicability of Funds
 - Effective Control Over All Funds, Property, and Other Assets
 - Written Procedures to Implement the Payment Requirements
 - Written Procedures to Determine the Allowability of Costs
- 75.303, Internal Control
 - Standards for Internal Control
 - Risk Assessment
 - Control Activities
 - Information and Communication
 - Monitoring

Subpart D: Post Federal Award Requirements

- 75.307, Program Income – Addition Method
- 75.308, Revision of Budget and Program Plans
- 75.320, Equipment
 - Use of Equipment
 - Management and Maintenance of Equipment
 - Property Records
 - Control System
 - Disposition

Subpart D: Post Federal Award Requirements

- 75.321, Supplies
 - Title to Supplies vest with the NFE
 - Supplies inventory exceeds \$5,000 upon project completion, obtain disposition guidance from ACF
- 75.361, Records Retention
- 75.327, Procurement Standards
 - Written procurement procedures
 - Written standards of conduct
 - Purchase complies with the NFE's documented procedures
 - Purchases are necessary
 - Open competition as required by each method
 - Conflict of Interest Policy
 - Proper documentation for purchase
 - Maintenance of records

Subpart E: Cost Principles

- 75.403, Factors Affecting Allowability of Costs – Reasonable, Necessary, Allocable and Allowable
- 75.414, Indirect Costs – Updated Policies
- 75.412 – 75.475, Selected Items of Cost – Cost are classified in one of three ways: Allowable, Allowable with Prior Approval, or Not Allowable

Subpart F: Audit Requirements

- Raises threshold to \$750,000
- Audits must be conducted annually with two exceptions
- Audits must be submitted 30 days from receipt of the audit report or within nine months after the end of the audit period

Post-Award Changes Requiring Prior Approval

- 75.308, Revision of Budget and Programs Plans
 - Change in scope or objective
 - Change in key personnel
 - Absence of key personnel for more than 3 months or 25% of time
 - Transfer of funds budgeted for participant support
 - Transfer or contracting out work not approved in application
 - Changes in the amount of approved cost-sharing or matching

Post-Award Changes Requiring Prior Approval

- Carryover of Unobligated Balances
- Significant Rebudgeting
- Need for additional funds
- Alteration and renovation of real property

Internet References

- HHS GPS
<http://www.hhs.gov/asfr/ogapa/aboutog/hhsgps107.pdf>
- 45 CFR Part 75
<http://www.ecfr.gov/cgi-bin/text-idx?node=pt45.1.75>
- System for Award Management (SAM) and DATA Universal Numbering (DUNS)
<https://www.sam.gov/portal/SAM/#1>
- Federal Financial Accountability and Transparency Act (FFATA)
<http://www.acf.hhs.gov/grants/award-term-for-federal-financial-accountability-and-transparency>

- PMS Contacts for University and Non profits
- http://www.dpm.psc.gov/contacts/university__non-profit.aspx?explorer.event=true
- PMS Contacts for Governments and Tribes
- http://www.dpm.psc.gov/contacts/governmental_and_tribal.aspx?explorer.event=true
- SF-425; SF-428 A,B,C,S; SF-429:
- https://www.whitehouse.gov/omb/grants_forms/