

Federal Grant Administrative Policies—Updating Your Knowledge and Watching for Coming Changes

Presented by

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Key Tools for Administering Federal Funds

- Administrative Requirements
 - OMB Circular A-102 Common Rule
 - OMB Circular A-110
- Cost Principles
 - OMB Circular A-87
 - OMB Circular A-21
 - OMB Circular A-122
- Audit Policy
 - OMB Circular A-133

Key Tools (Continued)

- OMB Regulations
 - 2 CFR 176 (ARRA)
 - 2 CFR 25 (DUNS Identifier)
 - 2 CFR 170 (FFATA *aka* Coburn-Obama)
- OMB Circulars Affecting Federal Actions
 - OMB Circular A-50 (Audit Follow-up)
 - OMB Circular A-89 (CFDA)
- Put Title 2 of the Code of Federal Regulations in Your Shopping Cart

OMB Proposal for Grant Reform

- ANPRM--Federal Register Announcement (2/28/12) (www.access.gpo.gov)
- 60 Day Comment Period (350 Sets of Comments)
- Their Next Step– NPRM with Additional 60 Day Comment Period
- Timing?

OMB's "Trial Balloons"

- Administrative Requirements
 - Consolidation of Circulars
 - Standardization of Funding Announcements and Pre-award Reviews
- Cost Principles
 - Consolidation of Circulars
 - Fixed Indirect Cost Rates
 - Alternative Time and Effort Reporting Methods

OMB's "Trial Balloons"

- Audit Policy
 - Threshold Increase
 - Possible Stratification
 - Streamlined *Compliance Supplement*
 - Coordination of Resolution of Audit Findings

Key Issues for Development Organizations

- Indirect Cost Recovery
 - Central Service Cost Allocation Plans
 - Indirect Cost Rate Proposals
 - Current Submission Requirements
 - Problem Areas
 - Approval of Plans for Subrecipients
 - Indirect Cost Caps

Key Issues for Development Organizations

- Subrecipient Monitoring
 - Current Requirement
 - Each subaward and each subrecipient
 - State of the Art
 - Pre-award techniques
 - Fashioning subgrant agreements
 - Post-award techniques

What Didn't OMB Think About?

Robert M. Lloyd

- Consulting services for effective federal fund management
 - Compliance advice
 - Training
 - Policy and procedure development and review
 - Audit resolution
 - Indirect cost rate development
 - Subgrant agreement drafting and review
 - Public policy advocacy
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