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

Presented by
Bob Lloyd
Annual Training Conference
National Association of Development Organizations
October 15, 2012
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
- E-mail: consultlloud@aol.com
- Telephone: (864) 235-8680
  (202) 775-0066