How To Keep Out of Trouble

An Overview of Financial Management for Program and Fiscal Personnel
Good library

Written Materials
- Law
- Grant agreement
- Code of Federal Regulations
- OMB Circulars
- Other guidance

Websites
- DOL-ETA
- OMB
Familiarize

- Grant agreement
  - Scope of work
  - Deadlines
    - For example, when quarterly program and fiscal reports are due
  - Contact info
    - For example, for drawing down funds
- Definitions
  - For example, administrative costs
- Budget
Familiarize

(Continued)

- Federal resources
  - Code of Federal Regulations
  - Program regulations
  - OMB Circulars
  - Agency guidance
    - For example, Training Employment Guidance Letters
- A-133 independent audits
Solid Organizational Basis

- **Written policies, procedures, protocols**
  - For example
    - Administrative manual
    - Fiscal procedures
    - Employee handbook
    - Purchasing manual
    - Conflict of interest
    - Confidential information
  - Posters posted
    - For example, EEO
    - Incident reporting
      - Fraud, waste, abuse

- Distribution of
Solid Organizational Basis

(Continued)

- **Separation of duties**
  - **Financial matters**
    - Sound internal control
    - For example, accounting functions
  - **Administrative matters**
    - For example, procurement
  - **Program matters**
    - For example, case managers and gift cards
Share and Communicate

- Within the organization
  - Policies
    - Within organization
    - With partners
    - With subrecipients
  - Quarterly reports
    - Program narratives to financial unit
    - Fiscal reports with program unit
  - Budgets
Share and Communicate

(Continued)

- Within organization (contin)
  - General information
    - About participants
    - About partners
    - About activities

- With subrecipients
  - Requirements
  - Grant expectations
  - Fiscal requirements
  - Reporting requirements
  - Policies
    - For example, allowable cost policy

- With DOL
Stay Within

- Your grant award
- Your budget line items
- Your scope of work
- Your organization’s policies
Ask Questions

- Within the organization
- Of DOL
  - The Federal Project Officer
  - The cost negotiator
- Of subrecipients
  - Participant activities
  - Expenditures
  - Obligations
  - Procedures
  - Security of funds
  - Security of assets
Ask Questions

(Part of the previous slide continued)

- Prior to purchasing or charging to the DOL grant...
  - Does the purchase support the grant goals?
  - Is the purchase during the period of the grant?
  - Is the purchase necessary?
    - Necessary?
    - Reasonable?
    - A benefit to the DOL-ETA grant?
  - Prior to purchasing big stuff, such as equipment
  - Prior to purchasing “iffy stuff,” such as
    - Marketing material
    - Flowers for the office
    - Lunches
Money

- Spend the grant funds timely (and allowably)
  - Don’t expend prior to grant award
  - Expend all before end of period of performance
- Organization credit cards
  - For purchases
    - Limits
    - Authorization
  - For travel
- Forecast fund needs
  - Communication very important to determine needs
    - Within the organization
    - With subrecipients
Money

Drawdown funds for immediate needs
- Book the grant funds separately

Once drawn, get the money out
- Book the expenditures against the grant funds separately

Accountable
- Gift cards
- Incentives
Documentation

- Support for all purchases
  - Invoices
  - Quotes
- Support for all procurement actions
  - Request for proposals
  - Sole source
- Support for funds
  - Drawing down the funds
  - Signatory of funds
    - At your organization
    - At your subrecipients
Documentation

(Continued)

- **Time sheets**
  - After-the-fact
  - Certified by employee and responsible official
  - Frequency
    - Prepared at least monthly
    - Coincide with pay period

- **Participant activities**
  - Eligibility
  - Time sheets
  - Supportive service payments
  - Training / school attendance
  - Achievements, milestones

- **Keep documents (record retention)**
Assets

- Accountability and safe-keeping of
  - Everyone’s responsibility in the organization
    - Computers
    - Laptops
    - Smart phones
    - Servers
    - Petty cash
Meet

- Meet
  - Within organization
  - With partners
  - Deadlines
    - Quarterly narrative reports
    - Quarterly fiscal reports
Training

- Federal awards and requirements
- Grant specific
- Organizational
  - For example,
    - Ethics training
    - Procurement
    - Internal controls
Important Miscellaneous

- Definition of “administration”
- Administration limit
- The Federal organization’s cognizant agency
- The organization’s indirect cost rate or cost allocation plan
- Timeline for submitting the indirect cost rate or cost allocation plan to DOL
- The Federal cost negotiator
C.Y.F.

- Call Your Fed