**4.2 FEDERAL GRANTS MANAGEMENT**

**Policy #: 4.2**

**Date Reviewed:**

**Approved: 9-13**

**PURPOSE**

The IAFN is committed to responsible federal grant financial management. The policy and procedural guidelines contained in this statement are designed to:

1. Ensure the maintenance of accurate grant records; and,
2. Ensure compliance with federal reporting requirements.

**FEDERAL FINANCIAL REPORTING**

**Monthly Review of Actual vs. Budget Expenses**

Expenses related to IAFN’s grant agreements are monitored on a monthly basis. At the end of each month after all transactions have been entered into the accounting system, the Finance Administrator runs a budget vs. actual report for each grant agreement. He/she reviews these reports for reasonableness and for indications that actual expenses may not be in line with approved budgeted amounts. Monitoring these variances on a monthly basis helps ensure that substantial expenses which have not been approved are not incurred. This monitoring also ensures that if necessary, budget modification requests can be made in a timely manner.

**Requesting Grant Reimbursement**

IAFN’s practice is to only draw funds after allowable expenses have been incurred. The Finance Administrator and CEO will review all charges for allowability. As such, IAFN requests funds from awarding agencies on a cost reimbursement basis. This practice ensures compliance with the federal administrative requirements for minimizing time between the federal transfer of funds to IAFN and IAFN’s subsequent disbursement.

Reimbursements for IAFN’s grant agreements are processed through automatic draw in the Payment Management System.

**Automatic Draw Down Reimbursement**

Electronic payments for expenses related to grant agreement expenses are made on a cost reimbursement basis and are requested the Payment Management System (PMS). The IAFN Finance Administrator and the CEO are the only IAFN staff who has access to the password protected system.

The IAFN Finance Administrator reviews the balance of each of the cooperative agreements, at a minimum, on a monthly basis to determine the total amount expended by IAFN on the grant related items. The CEO subsequently requests reimbursement for the amount through PMS. All amounts requested through PMS are documented in a spreadsheet. The spreadsheet is maintained by the IAFN Finance Administrator. The spreadsheet is maintained so that at any given time, IAFN knows the amount of funds requested and received for each of its grants, and have the necessary accounting support for the draw.

**Quarterly and Year End Grant Reporting**

Each quarter IAFN reports grant related spending to Department of Justice (DOJ) via the Division of Payment Management (DPM) online system. The FFR- Federal Cash Transaction Report for the quarter is due 30 days after the end of the period. The FFR is filed together the accounting data that backs it up.

Each year IAFN reports grant related spending data to DOJ by completing SF 425, which is due to DOJ no more than 90 days after the budget period ends.

**SELECTING CONSULTANTS**

IAFN will select consultants in accordance with the Department of Justice regulations and A-122 guidelines. A Consultant is an individual who provides professional advice or services.

**Responsibility**

The grantee is responsible for the settlement and satisfaction of all contractual and administrative issues related to contracts entered into in support of an award. This includes disputes, claims, protests of award, source evaluation, or other matters of a contractual nature

**Avoiding Conflicts of Interest**

Grantees shall avoid real or apparent organizational conflicts of interests and non-competitive practices among consultants with procurement supported by Federal funds. Procurement shall be conducted in a manner to provide, to the maximum extent practical, open and free competition.

Factors that should be considered when selecting a consultant are:

* Consultant integrity;
* Compliance with public policy;
* Record of past performance;
* Financial and technical resources;
* Responsive bid; and
* Excluded Parties Listing (Debarred Consultants https://www.epls.gov/).

Contracts will be normally competitively bid unless:

* The item is available only from a single source;
* After solicitation of a number of sources, competition is determined inadequate; or
* Meets the requirements of simplified acquisition.

**Notice and distribution of the RFP**

RFPs shall be distributed to an adequate number of qualified sources, at least 10 days prior to the date set for receipt of proposals.

**Evaluation of Proposals**

Evaluation of the proposals received by IAFN in response to an RFP shall be conducted based on price and other factors identified within the RFP. These factors typically include factors relevant to a determination of responsibility (such as financial, human, and organizational capability), as well as other technical factors (such as the degree to which the proposer is expected, based on information submitted and available, to achieve the performance objectives, to provide the quality expected, and on the relative qualifications of the proposer's personnel).

**Award and Compensation**

Upon conclusion of a competitive proposal process, IAFN may award a contract to a responsible consultant whose proposal is deemed most advantageous to IAFN and whose rate is in accordance with market value. Any agreement with a consultant will be in writing.

Project Director will seek approval on any consultant rate in excess of $650 per 8-hour day, or $81.25 per hour, prior to awarding contract on all Office on Violence Against Women grants and rates in excess of $450 per 8-hour day or $56.25 per hour on any other federal grant. Compensation for individual consultants is to be reasonable and consistent with that paid for similar services in the marketplace and consistent with the individual’s experience and expertise. Consideration can be given to compensation including fringe benefits for those individuals whose employers do not provide such benefits. An 8-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance.

**Monitoring**

The Project Director will monitor all consultant activities to include documenting performance, adherence to timeline or deadlines, time and effort reports, and review/verification of invoices. Any deficiencies in performance will be addressed directly with the consultant.