File Management Best Practices for FRCP Grants*

Grant Manager Roles

- 1. Internal Controls & Management Organization
- 2. Conflict of interest policy
- 3. Allowable and unallowable costs
- 4. Meeting deadlines
- 5. Internal monitoring and budget meetings
- 6. Risk Assessment with sub-contractors
- 7. Training staff on all changes
- 8. On-Site and Desk Monitoring practices

Pre-Award Documents

- 1. Request for Proposal (RFP), Request for Application (RFA) posted through funding source.
- 2. Proposal/Application submitted
 - a. Submittal of the proposal by the grantee, to include detailed budget, budget narrative, workplan, and project timeline
- 3. Confirmed there is no conflict of interests prior to execution of the agreement
 - a. Should a conflict arise after the execution of the agreement, documentation that FRCP has been notified of such
- Verification that all Sub-contractors have been searched and cleared on the Non-Debarment and Non-Suspension list for agreements \$25K or more in federal funds via <u>https://www.sam.gov/SAM/</u>
 - a. It is a good practice to search all sub-contractors regardless of funding source
- 5. Selection process documented for all sub-contractors with reasoning for the selection made
- 6. Established a file folder structure for each project
- 7. Notification of Grant Award
 - a. This may be an email indicating the anticipation of a grant award, pending State Fiscal Year Budget funding
 - b. This may be a letter from the funding entity advising of the grant award notification.
- 8. Communication documents

Types of Documentation

- 1. Restrictive Rules & Hierarchy
- 2. Non-Compliance & Failure to Comply
 - Written notification
 - Corrective action plan
 - o Financial consequences
- 3. Retention rules
 - Starts on the date the agreement is closed out by FRCP
 - FRCP requires 5 years retention
 - Follow agency rules on retention (only if longer than specified above)

Agreement Documents

- 1. Grant Agreement
 - a. Fully executed copy of the agreement between FRCP and the grantee
 - b. Includes all amendments or changes order that may be executed for the agreement
 - c. Sub-Contract Agreements and Major Purchases
 - i. Copy of each sub-contractor agreement used for the project
 - ii. Invoices/Receipts/Purchase Orders for all major purchases for the project
 - d. File close out documents

2. Financial Documents

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*Sampling of documentation to maintain with regards to FRCP state funded grants only. This listing is not all inclusive of grant management documentation requirements.

- a. Exhibit C Form clearly labeled and only those that are allowable per the grant agreement are being requested for payment
- b. All Sub-Contractor agreements and/or procurement process completed (include announcements that were posted if applicable)
 - i. Selection process utilized to select the winner
- c. All invoices received from any entity with relation to the project, to include Purchase Orders
 - i. Salary Documentation
 - 1) Timesheets, with job title, showing hours worked on the project dates those hours were worked, and signature of employee, verifying information
 - 2) Paychecks and/or pay stubs, showing wages paid out, and benefits paid out to employee
 - 3) Cancelled paycheck by employee or bank statement showing payment has cleared
 - ii. Fringe Benefit Documentation
 - 1) Copy of paychecks and/or pay stubs, showing wages paid out, and benefits paid out to employee
 - 2) Percentage of fringe calculations are indicated that meet or are less than the grant agreement documented rates allowed
 - iii. Indirect Costs
 - 1) Consists of facility costs, administrative salaries, legal services, insurance, taxes, etc.
 - All federally funded agreements must use the federally approved negotiated indirect rates, established from the Federal agency that provides the most funding to the grantee
 - 3) Federally funded rate can last from 1-5 years, before a new rate must be calculated
 - 4) If no federal rate has been established for the grantee, a defaulted approved rate of 10% may be used
 - iv. Travel Documentation
 - 1) Travel pre-approval forms, with estimated travel dates, and costs
 - 2) Post-travel forms, with actual costs submitted
 - 3) All receipts for travel costs
 - 4) All payments made to entities for travel costs that were paid out
 - v. Training Documentation
 - 1) All documentation regarding any training that is related to the project that the grant agreement is funding
 - 2) Listings of all participants in trainings that are related to the project that the grant agreement is funding
 - 3) Any receipts showing costs that were paid out for training that was related to the project that the grant agreement is funding
- d. In-kind or donations received for the project

3. Payment Requests

- a. Request for Payment via Exhibit C form as specified in the agreement
- b. Progress Report via Exhibit A form as specified in the agreement, showing requested task payment at 100% completion
- c. All receipts and backup documentation as required per agreement payment guidelines
 - i. Fixed Price Sub-Agreements, and all invoices
 - ii. Reimbursement Sub-Agreements, all invoices, salary, fringe, indirect, travel, training, etc. (as listed above 2.c.)

4. <u>Project Documents</u>

- a. Deliverables
 - i. All deliverables submitted for the project, clearly labeled for each task they are associated with
 - ii. Ensuring all deliverables are tangible, measurable, and verifiable

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- iii. All plans, permits, drawings and validations are saved in a pdf format and submitted with appropriate corresponding task(s)
- iv. Exhibit G documents if pertinent to deliverables
- v. Notification of each deliverable that was accepted by FRCP
- b. Quarterly Reports
 - i. All quarterly reports (Exhibit A) submitted for the project, clearly labeled for each quarter they are associated with
 - ii. All tasks for the project are included on every quarterly report, with a current status update on each task
 - iii. Percentage of completion for each task included
 - iv. Signed and dated by the Grant Manager
 - v. Notification of receipt by FRCP
- c. Final Report
 - i. Final Report submittal via the Exhibit F form as specified in the agreement
 - ii. Notification of receipt by FRCP

General Documentation

- 1. Correspondence, emails and letters
 - a. Correspondence between Grantee and Funder (i.e. change in grant manager assigned to the agreement, and grant closeout notification)
 - b. Correspondence between Grantee and sub-contractors or other entities relate to the project
- 2. Project Timeline with dates and funding amounts
- 3. Project reconciliation or closeout reports
- 4. Meeting minutes related to the project
- 5. Sign-in sheets for any meetings held
- 6. Press releases that were submitted
- 7. Any information that documents challenges or success with the project

Submittal Documents to FRCP

- 1. All Sub-Contractor agreements
- 2. All invoices received (as stated above)
- 3. All Deliverables (as stated above)
- 4. All Quarterly Reports (as stated above)
- 5. Final Report submittal (as stated above)
- 6. Request for Payment (as stated above)
- 7. All receipts and backup documentation as required

NOTE: All listed documents that are required to be maintained on file as a sub-recipient, are also required to be maintained for any sub-contractors that may be used for the project, by the sub-recipient.