Federal Grant Readiness & Capacity Training for Safety Net Service Providers

October 2026

County of Sonoma

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TODAY'S AGENDA

Welcome
- *Angela Struckmann, Director of Sonoma County Human Services Department*

A Look at Today's Federal Grant Landscape
- *Matthew Hanson, CGMS, GPC, Witt O'Brien's*

Grant Management Fundamentals
- *Daniel Petrelli, Witt O'Brien's*
- *Karen Patterson, Witt O'Brien's*

Discussion & Questions



Welcome



Angela Struckmann
Director
Sonoma County Human Services Department

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A Look at Today's Federal Landscape



Matthew Hanson, CGMS, GPC
Managing Director
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The Federal Grants Environment Has Changed

Traditional Environment

1. Program Performance
2. Financial Accountability
3. Periodic Monitoring
4. Individual Grant Compliance
5. Program-Specific Data
6. Corrective Action

VS

Emerging Environment

1. National Policy Priorities
2. Recipient Eligibility & Risk
3. Continuous Oversight
4. Enterprise Risk
5. Cross-System Analytics
6. Enforcement

Key takeaway:
Grant management is expanding beyond compliance into governance, risk management, data integrity, and organizational accountability.

What Is Driving the Change?

Administrative Priorities	Regulatory Change	Expanded Oversight	Data & Technology	Enforcement
• Executive Orders • Agency Policy Directives • Political Review of Federal Awards	• Proposed UG Revisions • OMB Circular Updates • New Certifications & Assurances	• Waste, Fraud & Abuse Initiatives • OIG Activity • Repeat Audit Findings	• AI • Predictive analytics • Cross-system data matching • Continuous monitoring	• False Claims Act • Grant termination • Payment withholding • Corrective actions • Suspension and debarment

Key Takeaway: These developments should not be viewed independently. Together, they create a federal funding environment characterized by greater scrutiny, faster identification of risk, and potentially greater consequences for compliance failures.

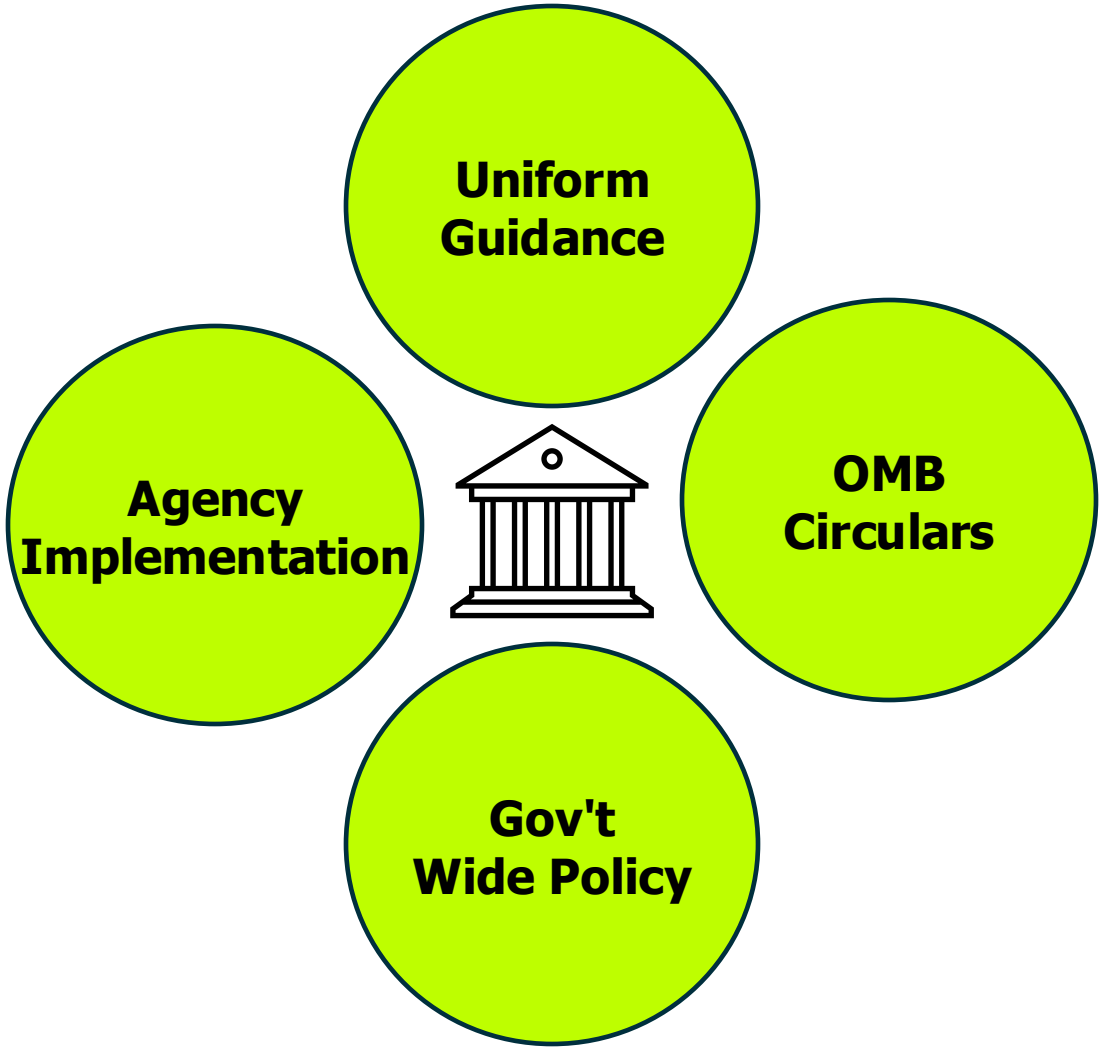
Executive Orders Are Moving Downstream

Executive Orders and Administration priorities are increasingly influencing:



Key Takeaway: The greatest operational impact of Executive Orders is often how they are implemented through federal financial assistance requirements.

OMB Is Reshaping the Government-Wide Framework



Recent OMB actions reflect increased emphasis on:

- Internal controls
- Fraud risk management
- Improper payments
- Data-driven oversight
- Third-party risk
- Documentation and management assurance

The Rules Are Changing: The Proposed Uniform Guidance Rewrite

Potentially the Most Significant Change to Federal Grants Administration in a Decade

Federal Discretion	Pre-Award Risk	Workforce Requirements
Expanded termination and stop-work authority	Expanded eligibility and organizational reviews	New verification expectations
Payment Documentation	**Subrecipient Oversight**	**Cost Restrictions**
Additional justification requirements	Expanded monitoring and reporting	New and revised allowability requirements

Proposed implementation target: October 2026

Change Is Occurring Across the Entire Grant Lifecycle

Pre-Award	Award	Post-Award	Oversight	Enforcement
Expanded risk reviews	New certifications	Payment justifications	Continuous monitoring	Corrective actions
Eligibility screening	New terms & conditions	Subrecipient reporting	AI/data analytics	Payment withholding
E-Verify	Policy requirements	SAM.gov reporting	Cross-agency data matching	Termination
Organizational risk	Assurances	Documentation	Audit findings	FCA exposure

Key takeaway:
Federal grant risk can no longer be managed exclusively by the grants or finance office.

Certifications Are Becoming a Greater Source of Risk

Certification and Assurances

- SAM.gov
- Grant Applications
- Award Agreements
- Payment Requests
- Financial Reports
- Performance Reports
- Closeout

Before the organization certifies:

DO WE KNOW:

What are we certifying?

CAN WE VERIFY:

Is the underlying information accurate?

ARE WE ALIGNED:

Can the entity comply organization-wide?

CAN WE DEFEND IT:

Is supporting documentation available?

The Risk:
Different Systems + Different Departments + Different Reporting Periods = Potential Inconsistencies

New Certifications and Assurances

SAM.gov is the System for Award Management

- The online portal for grantees and contractors doing business with the federal government
- 1/28/26 – GSA proposed changes to the terms and conditions – "reps and certs" – that contractors and grantees must sign (initial registration or recertification) to get their funding
  - Proposed terms and conditions notice
- It would force compliance with administration policies on DEI, undocumented immigration, and what they consider domestic terrorism
- The comment period for this rule ended March 30th

New terms & conditions:
Would apply to all recipients of grants, cooperative agreements, and financial assistance (loans, insurance, and direct appropriations)

- Must certify compliance with federal laws and EOs regarding DEIA
- Must promise not to "knowingly bring or attempt to bring to the United States, transport, conceal, harbor, shield, hire, or recruit for a fee an illegal alien"
- Must promise "not to fund, subsidize, or facilitate violence, terrorism, or other illegal activities that threaten public safety or national security"

SAM.gov Changes in Terms & Conditions

Major legal risks to grantees and contractors:

Not clear how these terms will be interpreted

It IS clear it will have a chilling effect

False Claims Act (FCA) and other civil and criminal liability – under FCA

Potential to disrupt essential programs and services

Increased Focus on Waste, Fraud, and Abuse

Coordination

- DOJ
- OIGs
- Federal Agencies
- Interagency Initiatives

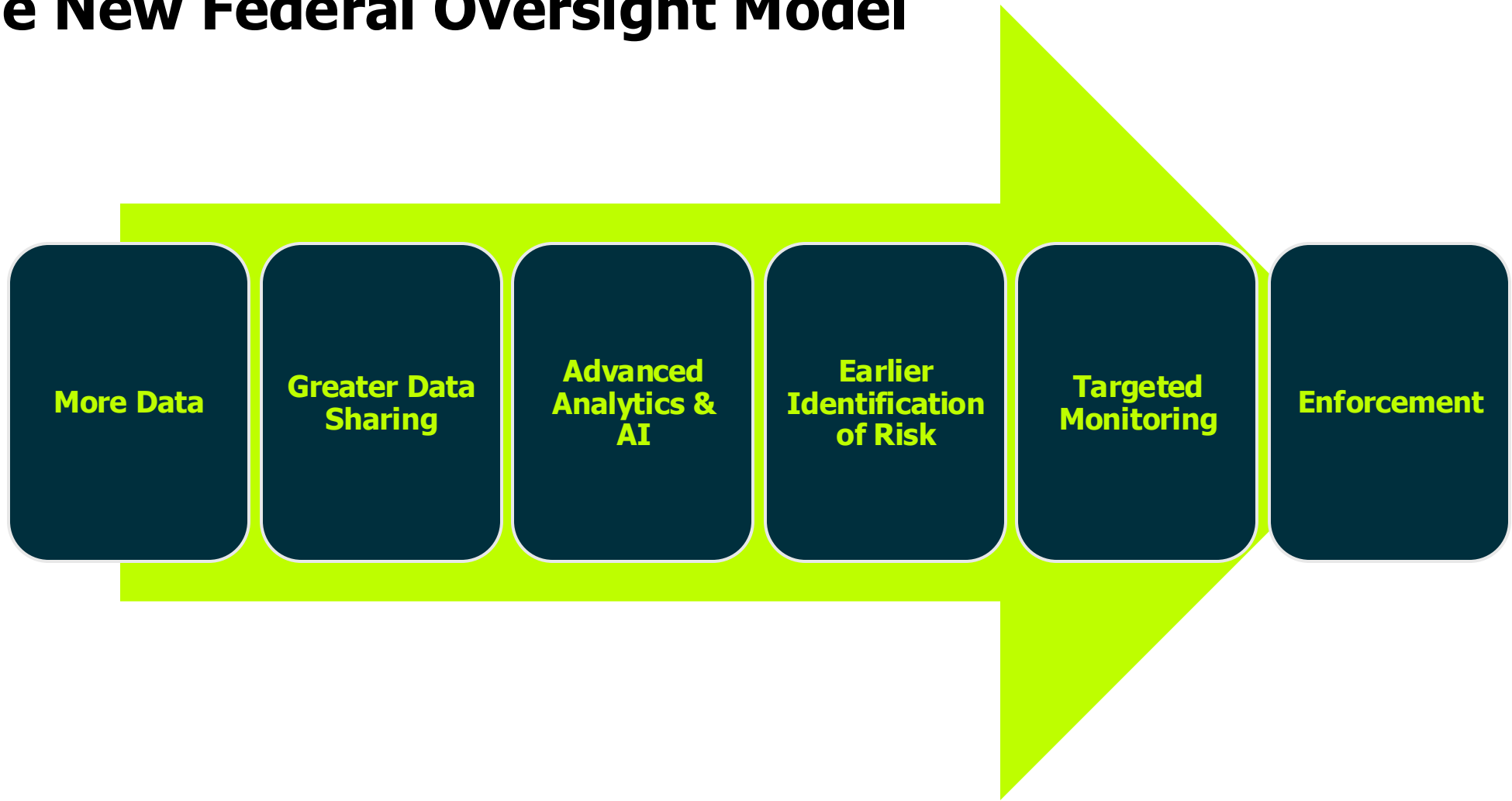
Data

- Federal Award Data
- Payment Information
- Audit Findings
- Eligibility Data

Enforcement

- Monitoring
- Corrective Actions
- Payment Restrictions
- FCA
- Suspension & Debarment

The New Federal Oversight Model



WHTF • DOJ • OIGs • AERO • Do Not Pay • Agency Monitoring

Task Force on Waste, Fraud, and Abuse

Government-wide Enforcement Shift

- Centralized, cross-agency fraud detection and oversight
- Expansion of US DOJ, Office of Inspector General (OIG), and interagency coordination

Data & Analytics Expansion

- AI and machine learning applied to federal funding data
- Cross-program data matching (grants, payments, eligibility, etc.)

Expanded Scope

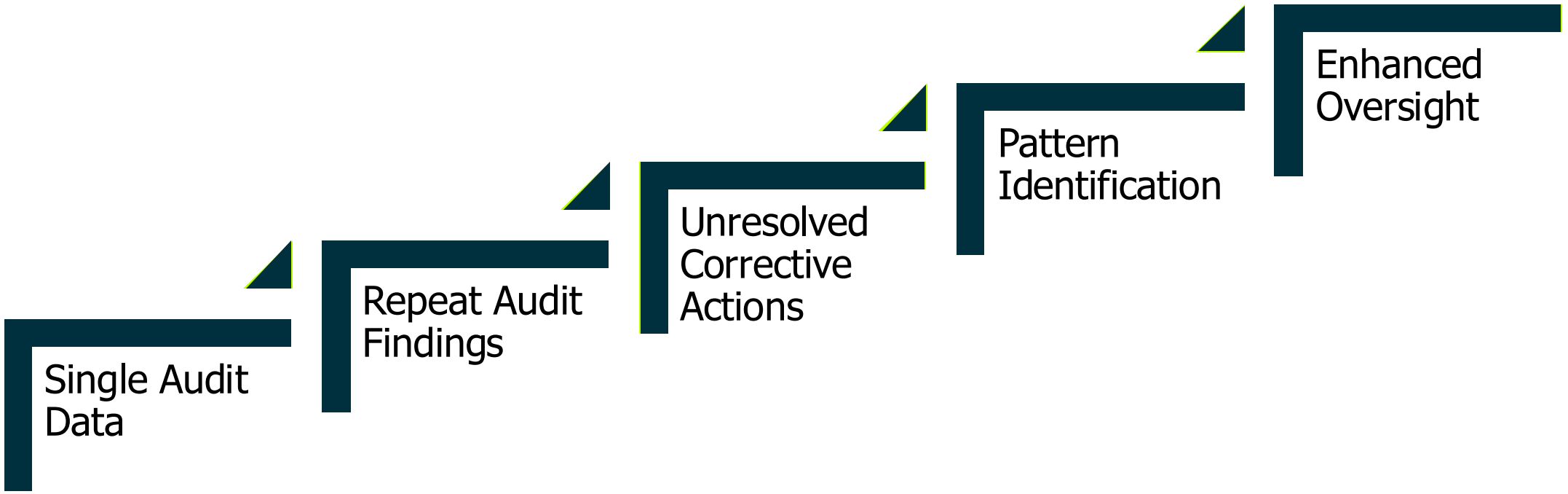
- Applies beyond benefits to grants, cooperative agreements, and contracts
- Increased scrutiny of pass-throughs, subrecipients, and contractors/vendors/suppliers

Risk to Recipients

- Continuous monitoring vs. periodic reviews
- Increased False Claims Act (FCA) exposure
- Heightened documentation and validation expectations

Key takeaway:
Assume your data will be analyzed, your decisions tested, and your documentation scrutinized.

Audit Enforcement and Risk Oversight (AERO): An Example of the Emerging Oversight Model



AI Is an Oversight Multiplier

More Data + AI & Advanced Analytics
= Faster Risk Identification

- Duplicate Payments
- Reporting Inconsistencies
- Unusual Transactions
- Repeat Findings
- High-Risk Recipients
- Questionable Relationships

Key takeaway:
AI is changing the scale, speed, and sophistication of Federal oversight.

False Claims Act (FCA) Risk to Grant Professionals

Expanded Liability through Certifications

- Certifications and assurances (e.g., SAM.gov, grant agreements, reports, etc.) carry legal weight
- Liability can attach even without intent (knowledge standard includes reckless disregard)
- Increasing use of program-wide certifications vs. program-specific requirements

Data-Driven Enforcement Environment

- AI and analytics used to identify anomalies across:
- Financial reporting
- Subrecipient data
- Eligibility determinations
- Inconsistencies can trigger investigations—even years later

Retroactive Compliance Risk

- Programs implemented under prior guidance may be judged under new interpretations
- Documentation gaps = potential exposure
- Evolving federal expectations increase ambiguity in compliance standards

False Claims Act (FCA) Risk to Grant Professionals

Third-Party & Pass-Through Exposure

- Liability can extend to:
  - Subrecipients
  - Vendors, contractors, and suppliers
    - Prime recipients are responsible for monitoring and oversight failures

Real-World Consequences

- Treble damages + civil penalties per violation
  - Qui tam (whistleblower) actions are increasing
  - Suspension, debarment, and reputational harm

Key takeaway:
False Claims Act (FCA) risk is no longer limited to fraud - It increasingly applies to compliance, documentation, and judgment calls. Grant professionals are now operating in an environment where "*If it is documented incorrectly, it may be treated as false".*

Final Takeaways

1. Federal financial assistance is undergoing a fundamental shift.
Changes in policy, regulation, oversight, and enforcement are collectively reshaping how federal awards are made, managed, monitored, and enforced.

2. Compliance is no longer static.
Executive Orders, OMB actions, agency guidance, certifications, and regulatory changes require recipients to continuously monitor and adapt to evolving federal requirements.

3. Federal oversight is becoming more data-driven and interconnected.
Expanded data sharing, advanced analytics, and AI are increasing the federal government's ability to identify inconsistencies, patterns, and potential risks across programs and over time.

4. Recipient risk is increasingly viewed at the organizational level.
Certifications, repeat audit findings, unresolved corrective actions, subrecipient oversight, and data inconsistencies may have implications beyond a single award or program.

5. Greater scrutiny requires greater visibility and preparedness.
In an environment of increased federal discretion and enforcement, recipients should understand their award portfolios, strengthen documentation and internal controls, and be prepared to demonstrate compliance.

Questions?



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Grant Management Fundamentals: Training Objectives

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Training Content and Objectives

Understanding:

- What is a Federal grant?
- Federal grant lifecycle
- Uniform Guidance (2 CFR Part 200)
- Federal grant readiness factors
- Recipient grant readiness capacity
- Capacity building
- Grant management
- Subrecipients carrying out activities
- Common subrecipient missteps
- Tools and resources



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Federal Grant Lifecycle

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Federal Funding Path

Congress appropriates the funds in legislation



Federal agencies make funds available to recipients and projects

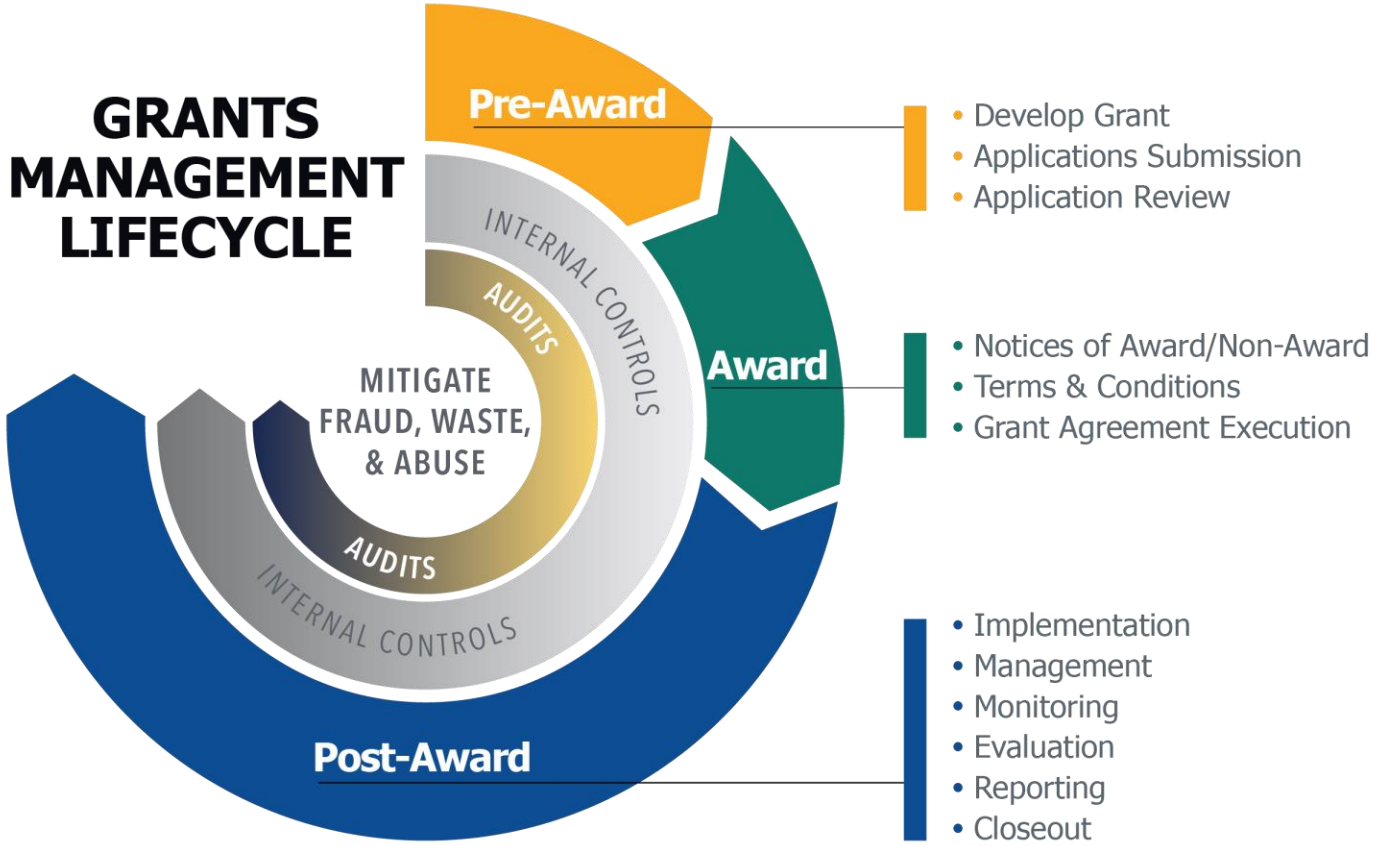
Federal funding is provided to states, local governments, universities, hospitals, nonprofits, small businesses, and private contractors in the forms of grants, loans, cooperative agreements, contracts, direct payments.



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The Federal Grant Lifecycle

- Divided into **three phases**, the entire process encompasses managing a grant **from planning and application, through award and implementation, and closeout**
- Understanding the grant lifecycle is **crucial for both the grantor and grantee to ensure effective management of funds** and **maximizing the impact of the awarded grants**
- Each phase requires **careful planning, execution and documentation** of **meeting compliance requirements and achieving the intended outcomes of the funding**



The Grant Lifecycle Phases

- **Pre-Award Phase:**
  - Begins with the planning of a funding opportunity and ends when the award decision is made

- **Award Phase:**
  - Begins once the agency selects recipients and issues formal award notifications, including the agreement that has grant terms and conditions

- **Post-Award Phase:**
  - Covers project or program implementation, monitoring, and closeout of the grant, as well as audit functions







The Grant Lifecycle Phases

Pre-Award

- Research
- Proposal Development
- Application Submission
- Application Review

Award

- Notices of Awards/Non-Awards
- Terms & Conditions
- Grant Agreement Execution

Post-Award

- Implementation
- Management
- Monitoring
- Reporting
- Evaluation
- Closeout

Pre-Award Phase

Federal Agency Responsibilities

- Develop clear program goals and funding priorities
- Create or update an Assistance Listing Number (ALN) in the System for Award Management (SAM)
- Publish the Notice of Funding Opportunity (NOFO) in Grants.gov (2 CFR 200.204)
- Establish eligibility criteria, evaluation metrics, and submission deadlines

Applicant Responsibilities

- Register with required systems (e.g., SAM.gov, Grants.gov)
- Review NOFOs and determine eligibility and alignment with organizational goals
- Develop and submit, on time, a complete application
- Respond to clarifications or requests for additional information (if applicable)

Pre-Award Phase
Review Process

- Applications are screened for eligibility and completeness
- Peer or technical review panels evaluate proposals based on published criteria
- Agencies conduct risk assessments (pre-award risk assessments and organizational risk factors) and may request clarifications
- Review Responsibility/Qualification records on SAM.gov to make informed awarding decisions on prospective recipients and protect the government from awarding grants to recipients that are not responsible
- Agencies will conduct a merit review of discretionary applications and the proposed activities in accordance with the awarding agency's written standards (2 CFR 200.205)

Award Phase

Federal Agency Responsibilities

- Awarding agency prepares the grant agreement
- Notification of successful and unsuccessful applicants
- Issue Notice of Award (NOA) with terms and conditions (see 2 CFR 200.211)

Recipient Responsibilities

- Review and accept the award by signing agreement acknowledging the award and all conditions
- Set up internal systems for financial management, procurement, recipient oversight, and property management
- Begin project implementation in accordance with the approved scope of work

Award Phase
Key Considerations

- Understand and comply with Uniform Guidance (2 CFR Part 200)
- Ensure grant carried out in compliance with terms, conditions and milestones of grant, regardless of who is carrying out the activities
- Prepare for ongoing monitoring and reporting to ensure compliance with the Uniform Guidance



Post-Award Phase

Federal Agency Responsibilities

- Monitor performance and compliance through desk reviews, site visits and audit reviews
- Provide technical assistance
- Close out the award upon completion
- Ensure non-federal entities have a single-audit conducted and have submitted the package to the Federal Audit Clearinghouse
- Follow up on audit findings to ensure timely corrective actions

Recipient Responsibilities

- Execute the project as proposed
- Monitor subrecipients (if applicable)
- Maintain accurate financial and programmatic records
- Submit required reports:
  - Federal financial reports (SF-425)
  - Performance progress reports
  - Final closeout reports
- Prepare for audits

Post-Award Phase
Closeout Requirements (2 CFR 200.344)

- Submit final financial and performance reports within 120 days of the end of the grant Period of Performance
- Resolve any outstanding issues, including any
  - Disallowed costs
  - Monitoring or audit findings
  - Disposition of real property and equipment
- Retain records for at least 3 years post closeout



Post-Award Phase
Key Activities

- Program implementation
- Financial and performance reporting
- Audit and monitoring
- Grant closeout and final reconciliation



Understanding the Federal Grant Lifecycle Helps:

Federal Agencies	▪ To ensure accountability and program success ▪ Promote transparency and capacity building
Applicants	▪ New applicants can begin registrations early and review NOFOs thoroughly to understand commitment and resources needed
Recipients	▪ Grant Managers should develop internal checklists and procedures for each of the grant lifecycle phases ▪ Ensure investments in training & systems that support compliance and performance

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Uniform Guidance (2 CFR Part 200)

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2 CFR Part 200:

Federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)

- Establishes the administrative requirements, cost principles and audit requirements **for all federal awards**
- Provides the **responsibilities** of recipients and subrecipients
- Identifies the need for **effective internal controls** that meet federal regulations
- Gives specific audit requirements for entities receiving and using federal funds
- **Changes** are announced through the Federal Register (www.federalregister.gov)

2 CFR Part 200:
Uniform Guidance Components

- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
- Subpart C – Pre-Award Requirements
- Subpart D – Post-Award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements
- Appendices

2 CFR Part 200:
Key May 29, 2026, Proposed Rule Changes:

- Uniform Guidance will be **Regulations and no longer characterized as "guidance"** (although the name will remain)

- Creation of a structure in which future OMB regulatory updates to the Uniform Guidance **applies to all federal departments and agencies** (would not require separate adoption in regulation)

- Changes made to the Uniform Guidance after the May 2026 Rule change will **apply government-wide**

- Any conflicts between the Uniform Guidance and agency or program regulations (including instances of **grant terminations**), the **Uniform Guidance will govern** for any circumstance where the regulatory provision is not required in **Federal statute**

2 CFR Part 200:
Key May 29, 2026, Proposed Rule Changes:

- **Addition** of a new provision to the Uniform Guidance stating that when an administering federal agency designs programs, the programs' "goals and objectives must be ...*aligned with administration* policies and priorities." (Emphasis added)

- Establishment of a "**pre-issuance review**," where agency heads designate "senior appointees" to ensure that grant applications are "consistent with applicable law, Federal agency priorities, and the national interest," to ensure "discretionary awards must, where applicable, demonstrably advance the President's policy priorities."

2 CFR Part 200:
Key May 29, 2026, Proposed Rule Changes:

- Proposes that "in administering Federal awards, to the maximum extent permitted by law, the Federal agency or pass-through entity must ensure that the Federal award is not used to fund, promote, encourage, subsidize, or facilitate" DEI/DEIA "policies, principles, or practices that violate any applicable Federal anti-discrimination laws."

(Note: DEI/DEIA is not defined in the May 2026 Proposed Rule; reference is made to the July 2025 Department of Justice guidance regarding unlawful discrimination.)


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Let's Take a
10 Minute Break
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Federal Grant Readiness Factors



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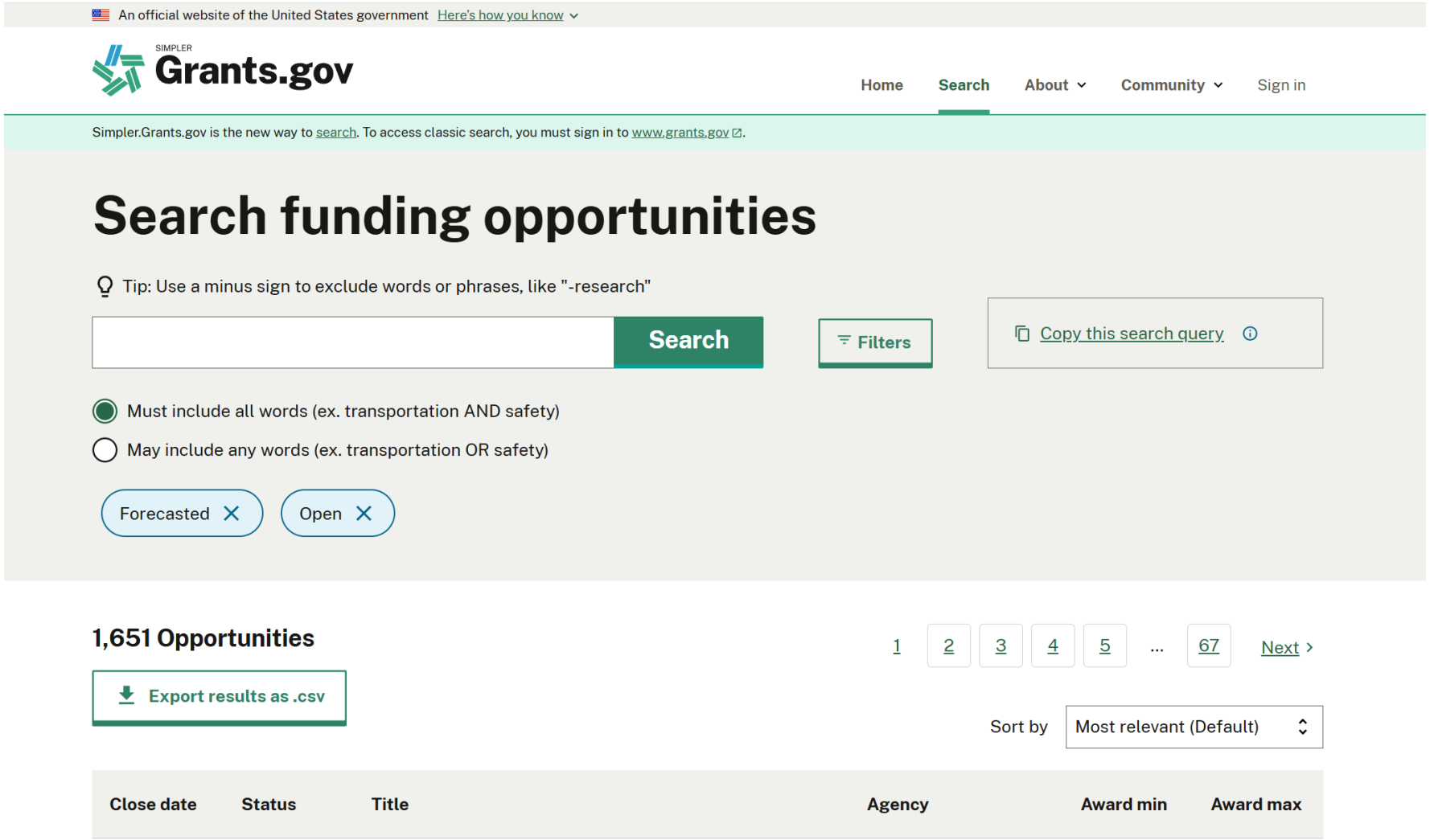
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Federal Grant Readiness Factors

- Specific requirements of the grant as found within the grant description in Grants.gov
- Uniform Guidance (2 CFR Part 200)
- Single Audits and monitoring
- Entity roles and responsibilities authorized under the Board of Supervisors
- Capacity to carry out all duties of grant and grant lifecycle phases



Federal Grant Opportunities



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REMINDER: New Certifications and Assurances

SAM.gov is the System for Award Management

- The online portal for grantees and contractors doing business with the federal government
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Organizational risk	Assurances	Documentation	Audit findings	FCA exposure

Key takeaway:
Federal grant risk can no longer be managed exclusively by the grants or finance office.



Recipient Grant Readiness and Capacity

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Review Grant Requirements and Perform Capacity Assessment

- Based on the details in the grant listing, **ensure** the grant will align with your organization's purpose
- **Evaluate** all functions required in the federal grant lifecycle phases
- Conduct a **capacity assessment** for the successful implementation of the grant activities
- Identify any needed **resources** to fill the gaps and eliminate risks



Evaluate if the Grant Program Goals and Requirements Align with Your Organization's Purpose

- Establish how the grant program or project will align with existing programs and/or projects
  - Mechanism for tracking grant outcomes versus existing programs/projects outcomes
  - Mechanism for tracking grant funds separately from other funds
  - Technology resources
  - Operational processes
- Gather information regarding Program and/or Project Goals and Outcomes
  - Data is necessary to demonstrate program effectiveness
  - Regular reporting to demonstrate grant impact
  - Documentation for compliance to terms and conditions



Assess Organizational Capacity and Readiness

- Are there adequate resources available to meet the demands of implementing and managing the grant, including
  - Staffing levels and qualifications
  - Internal controls systems
  - Technology resources
  - Operational processes



- Gather Necessary Information and Documentation
  - Refer to Notice of Funding Opportunity
  - Internal documents
  - Organizational charts
  - Policies and Procedures
  - Financial statements

Capacity Assessment Must be Robust Enough to:

- Determine if you have the people and systems to successfully apply for, be awarded, and manage grants, regardless of the complexity
- Identify any resources, processes, policies and procedures needed to ensure your successful implementation of the grant award
- Ensure a full understanding of all the requirements that come with the grant
- Identify risks and related mitigation strategies to shore up gaps in capacity
- Identify the data and documentation needed to support progress, outputs, outcomes and compliance with the grant goals, milestones and closeout requirements



Capacity Building:
Identify Risk

- Does your organization have any experience with **administering and managing federal, state or local grant funds?**
  - If so, was this in the past 12 months?
- Is your organization **tracking funding announcements on Grants.gov** or on other systems?
- If you have administered federal or even local grants in the last 5 years, did you have any **single audit findings or audit findings**?
  - Did your organization properly review and address any findings?

Identify strengths and weaknesses and BE REALISTIC!

Assess Financial Health and Funding Capacity

- Detailed **budget** outlining how grant funds will be utilized
- Evidence of organizational **financial stability**
- Past **Audits**, Financial Statements or Monitoring
- Identify potential weaknesses and areas of improvement
  - **Proactively address** any gaps in capacity, program alignment or financial management that could impact the grant or its implementation
  - Establish **robust** evaluation **metrics and milestones**
  - Identify and conduct any **staff training** needed
- Develop and follow an **Action Plan** for enhancing grant readiness



Grant Readiness:
Post-Capacity Assessment

- Are **current staff** capable of managing the grant, including all recipient oversight responsibilities
- If not, can additional staff be **hired** in time
- Are permanent staff the answer or would it make more sense to **procure** the expertise needed
- Will the grant administration budget cover all support costs, and if no, are non-grant funds available to cover the **funding gap**
- If **systems** are not yet in place, how long will it take to get them ready (contracts, reports, applications, checklists, monitoring strategy and plan, etc.)



Grant Readiness:

Policies and Procedures

Do you have the following in place?

- Policies and Procedures
- Generally Accepted Accounting Principles (GAAP)
- Clear and Robust Internal Controls
- Federal Procurement Processes
- Fraud, Waste, and Abuse Policy
- Conflicts of Interest Policy
- Financial Management Systems
- Awareness of Single Audit Requirements



Grant Readiness:
Compliance and Monitoring

Compliance (full grant cycle)

- **Major grants compliance concepts**, such as:
  - Identifying an award relationship -such as recipient, subrecipient, vendor/contractor (See 2 CFR 200.332 and/or 2 CFR 200.331)
- **Procurement:**
  - Have you reviewed your local procurement policy?
  - Have you reviewed Uniform Guidance and federal procurement requirements (See 2 CFR 200.317-320)
- **Risk Assessment**
- **Duplication of Benefits**
- **SAM.gov Registration**
  - Is your organization suspended, debarred, or showing delinquent with federal debt in Sam.gov?
- **Audit**
- **Closeout**

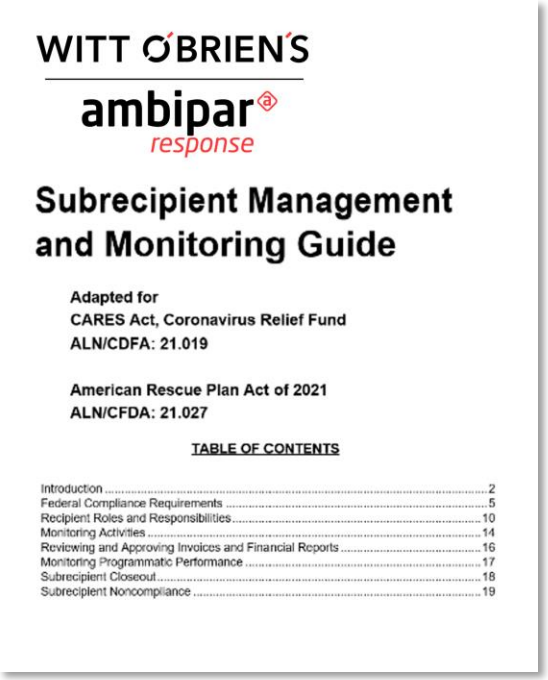
Monitoring

- Have you ever monitored a grant program?
- What resources do you have (strengths in personnel with monitoring experience, time, budget, etc.)?

Grant Readiness:
Compliance and Monitoring of Subrecipients

Federal grantee's records must include evidence of compliance for all subrecipients actions, including the subrecipients' compliance with:

- Grant Agreement Terms, Conditions and Requirements
- Procurement
- Duplication of Benefits
- SAM.gov Registration
- Monitoring
- Audit
- Closeout


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Subrecipient Management and Monitoring Guide

Adapted for
CARES Act, Coronavirus Relief Fund
ALN/CDFA: 21.019

American Rescue Plan Act of 2021
ALN/CFDA: 21.027

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Grant Readiness:
Internal Grant Management Processes



Ensure account is current and entity can access system



Assign a contact who is authorized to submit required reporting



Know your approval processes for grant acceptance



Communicate your success: have a press release, notify partners, etc.



Know who has authority to accept and sign award letters



Design a clear process to implement the project within the first 30 days



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Capacity Building

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The Impact of Capacity Building

- Capacity building develops the all-important **"infrastructure"** that supports and **enables success** for your grant program
- It empowers leaders and team members to **develop competencies and skills** that can make grant programs more effective and sustainable
- Capacity building allows federal grantees to ensure that they can **comply** with all the **required regulations and rules,** delivering important programs and services within their communities



Capacity Building:
Develop Current Resources



Use your Federal grant application as a template for future grant opportunities

- Leverage work you have already done



Invest in grant writing

- Materials you develop can support future applications
- Make sure you pay attention to the focus and/or prohibitions of the grant



Document lessons learned

- Keep track of both successes and challenges
- What are best practices for your organization/team?
- What did not work this round and where can you improve?
- Did you receive any feedback on your application or processes?

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Capacity Building:
Strengthen your Team

- Do you have staff assigned to or available for **researching grant opportunities, grant writing, and performing grants management?**
- Has your organization experienced rapid turnover or changes to key personnel in the last 12 months?
- Does your staff have the capacity and training to **manage grants post-award, including the monitoring of subrecipients and contractors?**
- How prepared are you to "hit the ground running" if you are awarded a new federal grant?
- What type of **stakeholder/public/community outreach and involvement** exists?
- Are your processes established such that they **identify key indicators of problems and red flags early,** before they become full non-compliant actions, and not wait until the end of the grant to evaluate performance?

Capacity Building:
Develop a Funding Strategy

Before applying for any grants, consider all potential funding, sources, uses, and needs

- Conduct an inventory of past, present, and future grants
- Review potential projects
- Identify priorities
- Make a graph or chart to compare the needs of the proposed program against different funding source requirements and eligibility
- Include previous grant success outcomes (did they accomplish the intended or did they fall short, and why?)

CITYWIDE

#	Legistar ID	Project Code			Project Name		Award	Cash Match	Total Program Resources
1	21-1864	051	G22	M22A0	WIOA Data Reporting Analysis Allocation 2020-2021		12,971.00		12,971.00
2	21-1865	051	G22	E22A0	Various Streets - 2021 - Newark (20 Various Locations, MA-21)		2,781,485.00		2,781,485.00
3	21-1866	051	G22	E22B0	Bergen Street Pedestrian Safety Corridor Improvements		3,053,937.20		3,053,937.20
4	21-1908	051	G22	A22A0	New Jersey Victim Assistance -Central Ward		137,500.00		137,500.00
5		051	G22	A22B0	New Jersey Victim Assistance -East Ward		137,500.00		137,500.00
6		051	G22	A22C0	New Jersey Victim Assistance -North Ward		137,500.00		137,500.00
7		051	G22	A22D0	New Jersey Victim Assistance - Shani Baraka Center		137,500.00		137,500.00
8		051	G22	A22E0	New Jersey Victim Assistance - South Ward		137,500.00		137,500.00
9		051	G22	A22F0	New Jersey Victim Assistance - West Ward		137,500.00		137,500.00
10	22-0021	051	G22	2H22A	STD EHE Program		418,110.00		418,110.00
11	22-0038	051	G22	2H22B	Immunization Program		41,275.00		41,275.00
12	22-0064	051	G22	2H22C	HIV Emergency Relief		8,138,173.00		8,138,173.00
13	22-0070	051	G22	E22C0	Safe Routes to School Design Assistance Grant		396,900.68		396,900.68
14	22-0094	051	G22	A22G0	Brick City Peace Collective (BCPC) Grant		3,000,000.00		3,000,000.00
15	22-0095	051	G22	A22H0	2022 Anti-Violence for Out of School Youth Project		1,500,000.00		1,500,000.00
16	22-0116	051	G22	P22B0	Body-Worn Camera Program		1,019,000.00		1,019,000.00
17	22-0170	051	G22	H22J0	Greater Newark Health Care Coalition		22,531.00		22,531.00
18	22-0284	051	G22	H22E0	Homeless HRSA.		3,773,497.00		3,773,497.00
19	22-0286	051	G22	2H22D	Ryan White HIV/AIDS – Ending the Epidemic (ETE) Program		492,300.00		492,300.00
20	22-0324	051	G22	D22A0	Lincoln Park Preservation District (LPPD)		125,000.00		125,000.00
21	22-0424	051	G22	E22D0	Various Street-2022 (20 Locations)		2,886,447.00		2,886,447.00
22	22-0470	051	G22	N22A0	2019 Recycling Tonnage Grant		215,514.48		215,514.48
23	22-0486	051	G22	2H22E	STD Ending the Epidemic (STD – EHE) Program- Additional Funds		250,019.00		250,019.00
24	22-0524	051	G22	E22E0	Broad Street Pedestrian Safety Corridor Improvements		4,856,257.51		4,856,257.51
25	22-0542	051	G22	M22C0	WIOA Other-On-the-Job Training (OJT)		390,000.00		390,000.00
26	22-0554	051	G22	M22B0	The Truancy Alternative Program (TAP) 2022		72,868.00		72,868.00
27	22-0656	051	G22	2H22G	Homeless Health Care PCHP		273,033.00		273,033.00
28	22-0696	051	G22	M22K0	WIOA Data Reporting and Analysis Allocation 2021-2022		12,971.00		12,971.00
29	22-0772	051	G22	P22C0	FY19 UASI Grant		9,000.00		9,000.00
30	22-0830	051	G22	2H22J	HRSA American Rescue Plan Capital Grant		621,363.00		621,363.00
31	22-0862	051	G22	A22J0	2021 American Rescue Plan-Act Build Back Better Regional Challenge Grant		500,000.00		500,000.00
32	22-0894	051	G22	N22D0	2022 Clean Communities		453,723.62		453,723.62
33	22-0938	051	G22	H22T0	STD (Sexually Transmitted Diseases) Program		168,851.00		168,851.00
34	22-0952	051	G22	M22N0	FY 2022 SYEP		1,232,000.00		1,232,000.00
35		051	G22	ARP00	US Treasury - American Rescue Plan		43,333,803.00		43,333,803.00
36		051	G22	M22M0	Alcohol Ed Rehab Fund		39,522.79		39,522.79
37	22-1069	051	G22	M22D0	WIA Adult 2022-2023		2,343,637.00		2,343,637.00
38		051	G22	M22E0	WIA Youth 2022-2023		2,503,478.00		2,503,478.00
39		051	G22	M22F0	WIA Dislocated Worker 2022-2023		808,458.00		808,458.00
40	22-1071	051	G22	M22J0	Workforce Learning Link 2022-2023		74,000.00		74,000.00
41	22-1094	051	G22	2H22D	Ryan White HIV/AIDS – Ending the Epidemic (ETE) Program		1,508,100.00		1,508,100.00

Capacity Building:
Choose the Right Grants

- Grantees should be able to identify how the grant purpose is aligned with their organization's priorities
- Grantees should be able to establish their eligibility of grant funding
- Grantees should review their capability to build a team that can properly address the complexities of the subject matter of grant application
- Grantees need to review their ability to meet match funding requirements and know how they will meet any budget gaps the grant funding will not cover
- Grantees need to analyze whether they can meet requirements for administering the grant
- Grantees should assess whether the funding timeline meets the project/program timeline

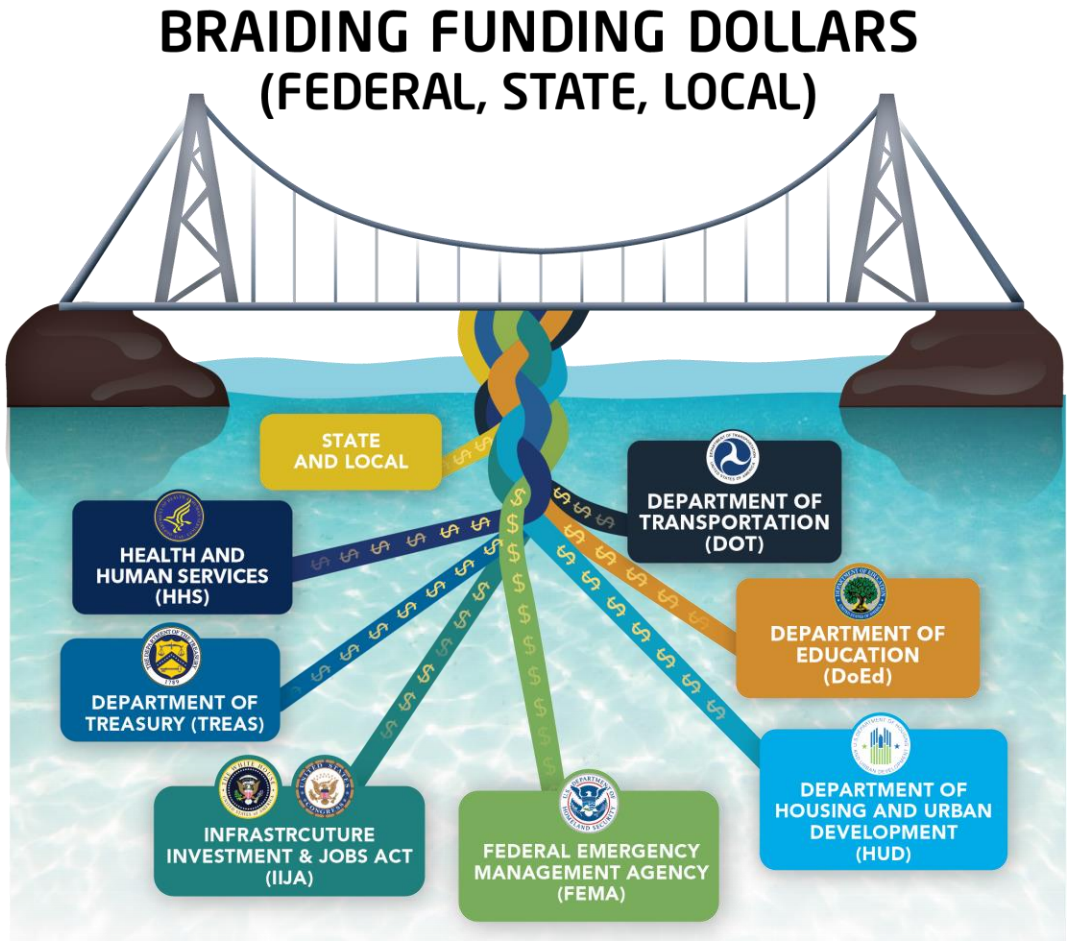
How the Grant Fits Within the Organization



Capacity Building:
Leverage Grant Funds

Fund Braiding: Using two or more independent funding streams to fund a single project

- These funding streams (or strands) never lose their individual "identity" in terms of respective reporting and compliance
- Grantees may be able to optimize the impact of federal funding by braiding and prioritizing funding sources with more (rather than less) stringent limitations on allowable expenditures
- Grantees must be able to track each funding stream to see what costs were covered, and must be able to document there were costs covered with more than one funding source
- Must be able to track each funding stream outputs and outcomes
- Carefully evaluate your capacity for this additional administrative burden





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Grants Management

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We Received the Federal Award -
How Will We Manage the Grant?

- Are we managing the grant internally
- Do we have all the staff in place
- Are they trained
- Are systems and processes in place
- Are all internal controls in place
- Are all checklists, reports, etc. in place
- Will there be subrecipients
- Will there be contractors



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In-House Grant Implementation

As Outlined In Proposal

CARRY OUT PROGRAM/PROJECT

- Begin program/project implementation as approved
- If necessary, notify funding agency of any needed adjustments
- Document actions, progress and compliance

MONITOR PROGRESS TOWARDS DEFINED OBJECTIVES

- Document monitoring activities per monitoring plan
- Maintain documentation for any adjustments necessary to keep program/project on schedule

COMMUNICATE THORUGHOUT THE GRANT PERIOD

- Kickoff meeting to establish timeline & responsibilities for all involved
- Effective communication with team, leadership, and stakeholders regarding progress, successes and challenges is key to the grant's success
- Maintain reporting schedules to funding agency



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In-House Grant Implementation, con't

As Outlined In Proposal

CLOSEOUT

- Ensure all **grant terms and conditions are met**
- Perform **Financial Reconciliation**, resolve any discrepancies, and prepare a final financial report
- Submit **final** programmatic and administrative **reports** to the funding agency
- **Submit** all required **closeout documentation** to funding agency
- Ensure **compliance** with requirements, including **Uniform Guidance**, are documented
- **Maintain** all grant-required **records** for the required period

AUDIT

- If annual expenditures meet threshold, conduct Single Audit



Post-Closeout Activities

Best Practices and Improvements

- Examine the **program design**, execution and results to identify any adjustments that would have produced greater outcomes
- Was the **data collected relevant**, allowing an assessment of the program/project outcomes, impacts and indicators or success
- Examine processes to ensure **decision-making was based on data**, and that the data-driven choices lead to the desired outcomes
- **Resource allocations** – conduct an evaluation to determine if adjustments would be necessary in future grants
- Performance – how did the **actual outcomes compare** to the projections, and are any adjustments needed to improve success
- **Accountability** – were policies and procedures sufficient to ensure all parties involved understood and carried out their tasks





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Subrecipients Carrying Out Activities

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Who is a Subrecipient?

Identifying a Subrecipient

It is the **substance**, and not the name of the agreement used, that identifies the relationship between the third party and the grantor

The **Subrecipient vs. Contractor Checklist** helps classify and determine the relationship, based on the actions and responsibilities to be undertaken

SEE: Uniform Guidance, **2 CFR Part 200.1** for subrecipient definition and **2 CFR Part 200.331** for Subrecipient and Contractor Determinations



Subrecipient/Contractor_____ Program Title & Year_____

Checklist to Determine Subrecipient or Contractor Classification

OBJECTIVE: Generally, the determination of the relationship with an entity is verified through the institutional review of the proposal narrative, budget justification, and other related proposal documents, as well as through discussions with key personnel prior to proposal submission. When the relationship remains unclear, this form may provide assistance in making an accurate determination.

DEFINITIONS FROM UNIFORM GUIDANCE (2 CFR, PART 200):

Subrecipient:
§200.93 Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding

Contractor:
§200.23 Contractor means an entity that receives a contract as defined in §200.22 Contract.
§200.22 Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.

INSTRUCTIONS: Complete sections one and two of the checklist by marking all characteristics that apply to the outside entity. The section with the greatest number of marked characteristics indicates the likely type of relationship the entity will have with the local government agency. On occasion there may be exceptions to the type of relationship indicated by the completed checklist. In these situations, the substance of the relationship should be given greater consideration than the form of agreement between the local government agency and the outside entity. Section 3 should be used to provide documentation on the use of judgment in determining the proper relationship classification.

NAME OF OUTSIDE ENTITY: _____

SECTION 1 - SUBRECIPIENT

Description: *A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the contractor:*

☐ 1. Determines who is eligible to receive what Federal assistance;
☐ 2. Has its performance measured in relation to whether objectives of a Federal program were met;
☐ 3. Has responsibility for programmatic decision making;
☐ 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Entities that include these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal award.

SECTION 2 - CONTRACTOR

Description: *A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds:*

☐ 1. Provides the goods and services within normal business operations;
☐ 2. Provides similar goods or services to many different purchasers;
☐ 3. Normally operates in a competitive environment;
☐ 4. Provides goods or services that are ancillary to the operation of the Federal program.

Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

FINAL DETERMINATION:

☐ **SUBRECIPIENT** ☐ **CONTRACTOR**

OPTIONAL - SECTION 3 - USE OF JUDGMENT (use only when the determination cannot clearly be made using the above criteria)

Description: *In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.*

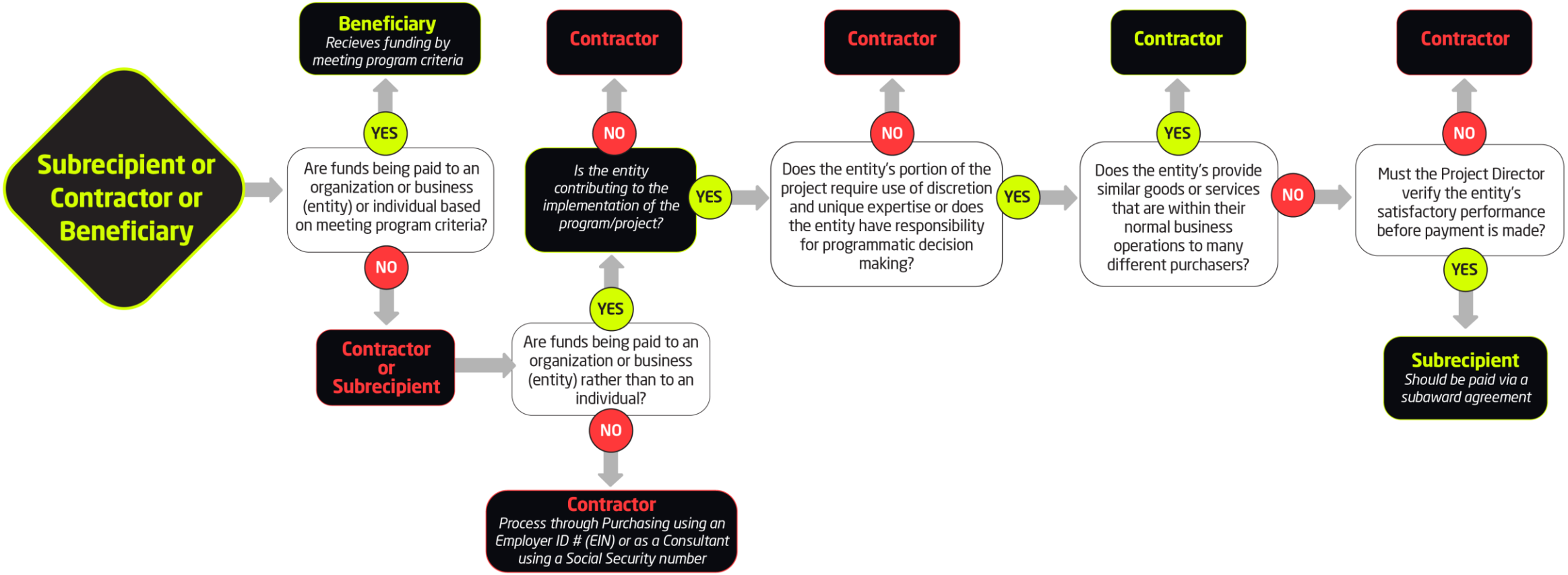
Explanation of Use of Judgment Determination:

Prepared By: _____ **Date:** _____

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Subrecipient vs. Contractor vs. Beneficiary

Relationship Determination



When Subrecipients Carry-Out Activities

Pre-Award Risk Assessment

- Per Uniform Guidance at 2 CFR 200.206(b), risk assessments are required
- Subrecipient awards must be conditioned sufficiently to mitigate and manage risks of that subrecipient



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Subrecipient Risk Management

Internal Controls

Process designed and implemented to provide reasonable assurance regarding the achievement of objectives in the following categories:

- **Effectiveness** and efficiency of operations;
- Reliability of reporting for **internal and external** use
- Compliance with applicable laws and regulations **(2 CFR 200.1)**

Components of Internal Controls

- Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring Activities

Examples of Areas of Internal Controls

- Separation of duties, second set of eyes, approval procedures
- Document, document, document
- Justification for expenditures
- Recordkeeping
- Memorandums of understanding
- Monitoring
- Safeguards against loss, inventory guidelines
- Standard operating procedures (SOPs)
- Accounting procedures/manuals
- Separate grant codes, separate accounts
- Cash management

Subrecipients Must be Managed During Grant Period

- Regular **check-ins** with Subrecipient to understand progress and identify any roadblocks early
- Timely and complete **reporting** that includes both programmatic and financial progress
- **Risk-based monitoring** to validate compliance and to maximize impact of monitoring
- Review of annual **audits** to determine if there are any findings that require action
- **On-site visits** allow confirmation of compliance with documentation, financial records, physical assets, written policies and procedures, audits, and internal controls



Close Out Subrecipient Grants Prior to Closing Out Main Grant

Each subrecipient award must be closed out with documentation showing:

- All reporting has been received, reviewed and accepted
- Final financial reconciliation completed with any unspent funds disencumbered from the grant
- All monitoring findings resolved
- All Single Audit findings resolved
- Documentation retained for the required period



Common Subrecipient Missteps

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Avoidable Issues and Monitoring Findings

- Conflicts of Interest
- Ineligible Uses
- Costs incurred outside Period of Performance
- Insufficient Internal Controls (including segregation of duties)
- Procurements that did not follow policy
- No information technology system in place to adequately prevent fraud and waste
- Did not treat costs consistently between grant and non-grant expenditures

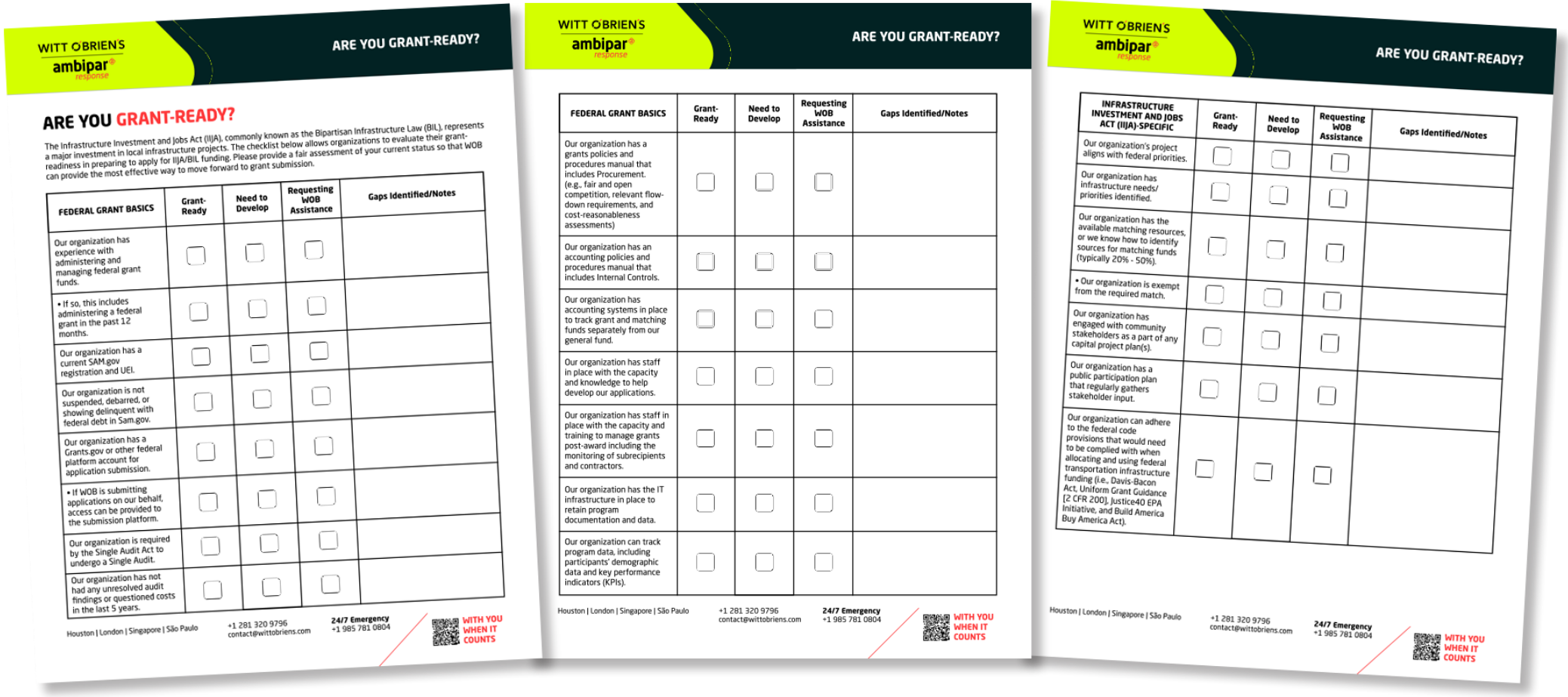


Tools and Resources

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Tools and Resources:
Are You Grant Ready Checklist



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ARE YOU GRANT-READY?

ARE YOU GRANT-READY?

The Infrastructure Investment and Jobs Act (IIJA), commonly known as the Bipartisan Infrastructure Law (BIL), represents a major investment in local infrastructure projects. The checklist below allows organizations to evaluate their grant-readiness in preparing to apply for IIJA/BIL funding. Please provide a fair assessment of your current status so that WOB can provide the most effective way to move forward to grant submission.

FEDERAL GRANT BASICS	Grant-Ready	Need to Develop	Requesting WOB Assistance	Gaps Identified/Notes
Our organization has experience with administering and managing federal grant funds.	☐	☐	☐	
• If so, this includes administering a federal grant in the past 12 months.	☐	☐	☐	
Our organization has a current SAM.gov registration and UEI.	☐	☐	☐	
Our organization is not suspended, debarred, or showing delinquent with federal debt in Sam.gov.	☐	☐	☐	
Our organization has a Grants.gov or other federal platform account for application submission.	☐	☐	☐	
• If WOB is submitting applications on our behalf, access can be provided to the submission platform.	☐	☐	☐	
Our organization is required by the Single Audit Act to undergo a Single Audit.	☐	☐	☐	
Our organization has not had any unresolved audit findings or questioned costs in the last 5 years.	☐	☐	☐	

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ARE YOU GRANT-READY?

FEDERAL GRANT BASICS	Grant-Ready	Need to Develop	Requesting WOB Assistance	Gaps Identified/Notes
Our organization has a grants policies and procedures manual that includes Procurement. (e.g., fair and open competition, relevant flow-down requirements, and cost-reasonableness assessments)	☐	☐	☐	
Our organization has an accounting policies and procedures manual that includes Internal Controls.	☐	☐	☐	
Our organization has accounting systems in place to track grant and matching funds separately from our general fund.	☐	☐	☐	
Our organization has staff in place with the capacity and knowledge to help develop our applications.	☐	☐	☐	
Our organization has staff in place with the capacity and training to manage grants post-award including the monitoring of subrecipients and contractors.	☐	☐	☐	
Our organization has the IT infrastructure in place to retain program documentation and data.	☐	☐	☐	
Our organization can track program data, including participants' demographic data and key performance indicators (KPIs).	☐	☐	☐	

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ARE YOU GRANT-READY?

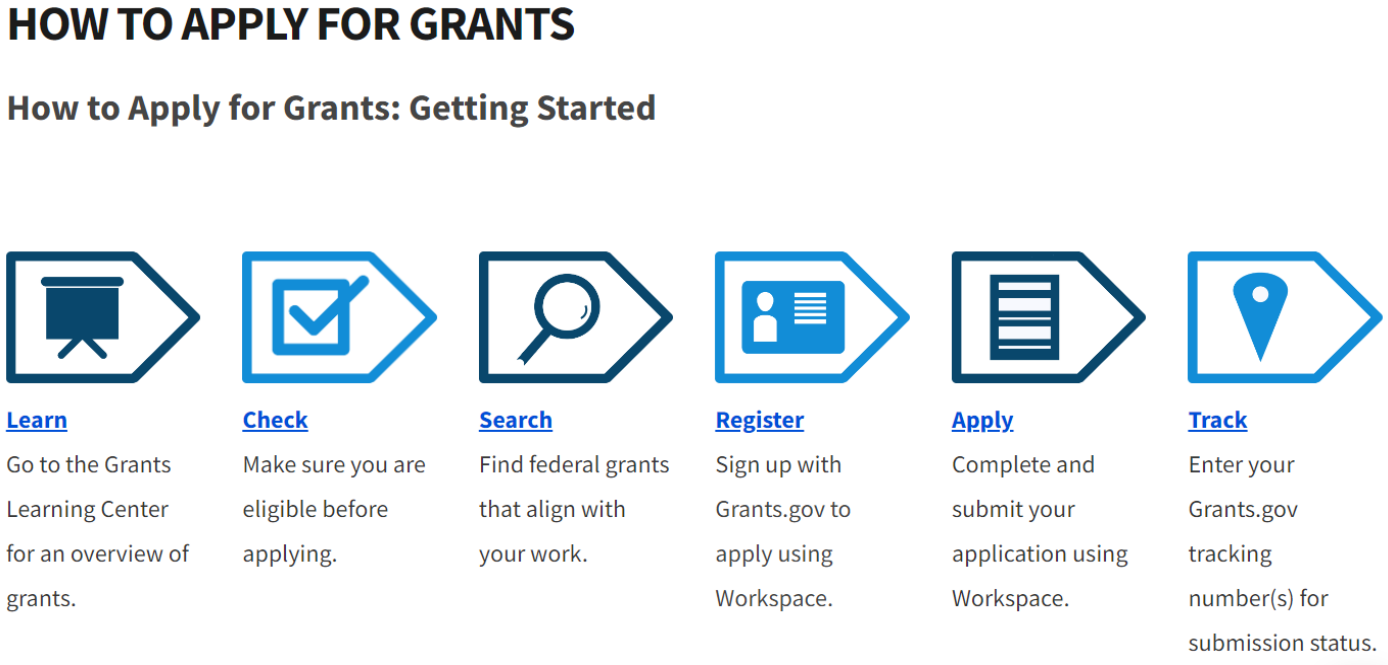
INFRASTRUCTURE INVESTMENT AND JOBS ACT (IIJA)-SPECIFIC	Grant-Ready	Need to Develop	Requesting WOB Assistance	Gaps Identified/Notes
Our organization's project aligns with federal priorities.	☐	☐	☐	
Our organization has infrastructure needs/ priorities identified.	☐	☐	☐	
Our organization has the available matching resources, or we know how to identify sources for matching funds (typically 20% - 50%).	☐	☐	☐	
• Our organization is exempt from the required match.	☐	☐	☐	
Our organization has engaged with community stakeholders as a part of any capital project plan(s).	☐	☐	☐	
Our organization has a public participation plan that regularly gathers stakeholder input.	☐	☐	☐	
Our organization can adhere to the federal code provisions that would need to be complied with when allocating and using federal transportation infrastructure funding (i.e., Davis-Bacon Act, Uniform Grant Guidance [2 CFR 200], Justice40 EPA Initiative, and Build America Buy America Act).	☐	☐	☐	

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Tools and Resources:
Grants.gov

- Utilize e-grants systems like www.grants.gov to identify funding opportunities
- Subscribe to receive alerts when relevant Notices of Funding Opportunities (NOFOs) are posted or updated
- Complete a Grants 101 training



Tools and Resources:
Other Actions

- Obtain and keep an ***active*** sam.gov registration
- Understand how to check for debarment, obtain a UEI, and pull documentation for contractors and subrecipients from sam.gov
- Understand where to pull assistance listing and grant compliance criteria from sam.gov
- Establish and maintain an indirect cost rate with your cognizant federal agency



Visit Our Center For Grants Excellence for Continued Resources

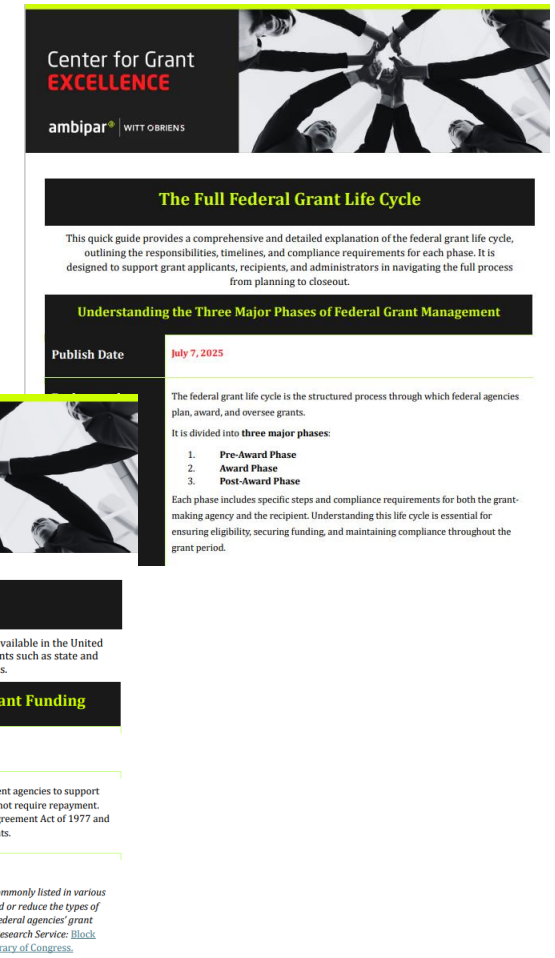
Resource library

Comprehensive guidance for actions that happen before receiving a grant award, from organizational preparation, grant research and pursuance, to application development and submission. This phase focuses on positioning for success, leveraging grant strategy, and creating competitive grant proposals.

a. Organization Readiness

b. Project Readiness

i. Intro to Grant Planning
ii. Grant Readiness Checklist
iii. Avoiding Supplanting
iv. Readiness for Programmatic Projects
v. Readiness for Construction Projects
vi. Grant Portfolio & Policy Inventory Template



QR Code to the Center for Grants Excellence

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Discussion & Questions



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Questions to Consider

1. What current Federal funds are you managing?
2. Are you applying for Federal grants currently? What are they?
3. How does your agency identify priorities and seek funding for those projects?
4. Do you have people on your team dedicated to grants management?
5. Do you have established systems of record (SharePoint, etc.) and other technology for managing grants?



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What Are Your Questions?



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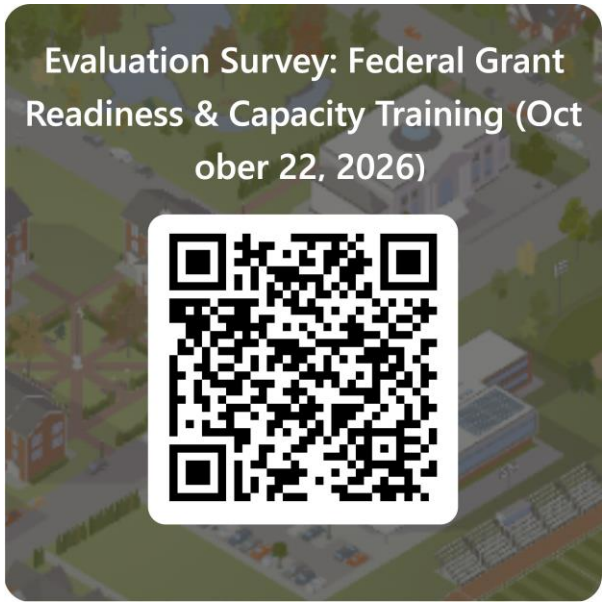
Post-Training Evaluation Survey

Evaluation Survey: Federal Grant Readiness & Capacity Training (October 22, 2026)

- Link to access training survey:

  https://forms.cloud.microsoft/r/4xnDF5AkbB

- QR Code to access training survey:



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THANK YOU!

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Are You Grant Ready?

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