Introduction
As part of its ongoing efforts to provide useful technical assistance to Grant Program Managers and staff supporting grant management and compliance, the School District of Philadelphia has developed this guide to core competencies in grants management, illustrated with “Best Practices” drawn from “real world” examples. The Office of Grant Development and Compliance (OGDC) interviewed Grant Program Managers (GPMs) in various schools and central offices who were reported to demonstrate best practices on a consistent basis. This document describes key competencies that characterize effective grants management, provides best practice examples currently used by existing SDP office that can provide support, and offers grant team members ways to identify their own strengths and opportunities for improvement.

The core competencies / best practices are intended to serve as a guide to prompt reflection and self assessment on the part of grant team members and to improve performance and outcomes. Though the core competencies listed here are critical to the success of the Grant Program Manager, development of the competencies and implementation of the practices listed below will improve the grants management skills of any staff member. This initial version of the competencies / best practices guide will be revised regularly to ensure it is used and useful.

Who is this document for?
This document is intended for the personnel responsible for grant management including Grant Program Managers, Principals, and other grant team members, which includes Grants Budget Analysts, Grants Accounting staff, Grants Compliance Monitors, school support staff, and sub-grantees of District grant programs.

What’s a competency?
A competency is a combination of knowledge, skills and abilities that are required to perform a task or set of tasks. Combined, proficiency in several related core competencies leads to skill and aptitude in a broader field or area. The core competencies that are described here are all important and interrelated. Managing a program and grant effectively requires proficiency in all of the core competencies.

This tool is designed to answer two critical questions. What must one be able to do to manage a grant well? What are the “critical few” things that one should know in order to evaluate whether or not a program is at risk of poor performance and management, and reduce those risks?

The eight competencies defined in this document are intended to support efforts to run a high quality program, best serve the program participants and stakeholders, and meet the needs and mission of the District. Applying these competencies will improve program operations and performance as well as minimize the risk of non-compliance with federal and non-federal requirements. They are also intended to empower the Grant Program Manager and grant team to take charge of a program’s performance and design appropriate changes.

What’s a “Best Practice?”
A best practice is a method or technique that has consistently shown results superior to those achieved with other means, and that is used as a benchmark. The SDP best practices identified in this guide are
those that SDP managers are using to effectively and efficiently achieve their grant objectives and outcomes with little to no compliance issues. However, grant program managers or offices not identified in this guide may well in fact be using the same best practice techniques listed here or have similar practices. We encourage managers to contact us in OGDC to describe those practices for inclusion in this document.

**How should this document be used?**
The competencies were developed to stimulate one’s thinking as a member of the grant team. The Best Practices listed are real world examples that a Grant Program Manager / Principal can immediately apply to improve results and outcomes. The named offices / grants currently exhibiting those best practices are provided for advice and support. It is important to point out that there is no easy answer or quick fix – much of sound program management is the result of careful, deliberate, time consuming, and complex work. Review these competencies and best practices alone and with the grant team, and plan specific steps to address the areas of weakness identified. The Office of Grant Development and Compliance is available to support your efforts in any way possible.

**TOP 8 EFFECTIVE GRANTS MANAGEMENT CORE COMPETENCIES**

1. **Using Management Systems**  
   Maintain an organizational structure for managing a grant that produces results, ensures coordination, and builds accountability.

2. **Managing Risk**  
   Understand what constitutes financial and program risk as it relates to a grant, and the ability to characterize a program according to risk assessment principles.

3. **Understanding Federal and Non-Federal Requirements**  
   Understand all federal and/or non-federal requirements pertaining to a grant, including grant provisions, and take steps to ensure they are addressed.

4. **Translating a Proposal into a Program Plan and Using It**  
   Create a program plan for implementing a grant and a process to track its progress.

5. **Managing and Administering Sub-grants**  
   Develop a judicious, reasonable, and effective process for selecting and managing sub-grants.

6. **Managing Budget and Finances**  
   Understand financial management principles and have a comprehensive system for organizing financial statements, managing and documenting costs, and ensuring internal controls.

7. **Keeping Records and Documentation**  
   Understand documentation needs and requirements and meet them with regularity.

8. **Continuous Review**  
   Address prior programmatic and financial weaknesses, and continue to review a program’s performance making mid-course corrections as needed.
**Guide to Acronyms**

<table>
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<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>CTE/Perkins</td>
<td>Office of Career &amp; Technical Education/Perkins Act Program</td>
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<tr>
<td>Early Childhood / PKHS</td>
<td>Office of Early Childhood/ Pre-Kindergarten Head Start Program</td>
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<tr>
<td>Ed Tech</td>
<td>Office of Educational Technology</td>
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<tr>
<td>GBA</td>
<td>Grant Budget Analyst</td>
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<td>GFS</td>
<td>Grant Fiscal Services</td>
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<td>GPM</td>
<td>Grant Program Manager</td>
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<td>OGDC</td>
<td>Office of Grant Development and Compliance</td>
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<td>OSS/IDEA</td>
<td>Office of Specialized Services/Individuals with Disabilities Education Act Program</td>
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<tr>
<td>OT/RTT</td>
<td>Office of Talent/Race to the Top Program</td>
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<tr>
<td>SIG</td>
<td>School Improvement Grant Program</td>
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1. USING MANAGEMENT SYSTEMS

A management system is a grouping of people and processes that act together to achieve a common goal or set of objectives. A good organizational structure includes a clear delineation of roles and responsibilities, as well as an explicit timeline for the accomplishment of key tasks necessary for effective program implementation. Managers should ensure that staff understand their role in the organizational structure, and how their unit or department fits within the larger organization. Grant program management in the District is also guided by the written policies and procedures accessible to all staff. Effective management structures depend on the use of appropriate technology for communication and the sharing and storing of information. Regular communication among different parts of the organization ensures that all personnel are informed of the organization’s mission, activities, and any news or events. Finally, an effective management structure has a comprehensive human resources plan that includes approaches for training new grant team staff in their program and administrative responsibilities, including uses of relevant technology, evaluating employees, and providing regular feedback to employees on their performance. It then uses this information to design staff development programs.

Assessment

- Does the organizational structure include a clear delineation of roles and responsibilities?
- Have avenues for oversight and regular communication among different program and District staff been created?
- Have cross training and established systems providing for back up in cases of staff absentees or other emergency situations been provided?
- Has sufficient staff training been offered in specific District policies/procedures, the uses of relevant technology, and other areas pertinent to employees’ roles?

Tools/Resources

- Effective Communication Strategies
- Zimbra Calendar / E-Mail System
- SDP’s Grant Management Policies and Procedures (online via OGDC’s website, [http://webgui.phila.k12.pa.us/offices/g/grants/policies--procedures](http://webgui.phila.k12.pa.us/offices/g/grants/policies--procedures)), along with OGDC-provided training.
- Other SDP Policy/Procedure publications and related training, such as finance procedures, etc.
- Office of Employee Relations

Best Practice Examples / Support

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<th>Best Practice Examples</th>
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<tr>
<td>Written mission statement and job descriptions align to grant. In the central office, all GPMs know their roles and have access to the people who support the program (procurement/ordering, clerical, etc.). All program operations / central areas are braided together in both a vertical and horizontal alignment of relationships and program operations. Staff support each other.</td>
<td>Early Childhood / PKHS</td>
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<tr>
<td>Annual memorandum to staff detailing specific job performance expectations related to grant. Central office staff make school site visits to review program progress using the Danielson rubric.</td>
<td>Ed Tech</td>
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### Best Practice Examples (continued)

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<th>Best Practice</th>
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<tr>
<td>Weekly and bi-weekly meeting structure and morning check-ins with field staff and periodic training with Principals.</td>
<td>CTE / Perkins</td>
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<tr>
<td>Meetings are held regularly to ensure that personnel are carrying out responsibilities with a focus on field expectations and activity. Meeting agendas and minutes are maintained.</td>
<td>Early Childhood / PKHS</td>
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<tr>
<td>A full staff meeting is held is held weekly (to include the secretary) to foster communication. There’s a clear chain of command and everyone knows where to find information.</td>
<td>OT / RTT</td>
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<tr>
<td>Detailed program policies and procedures are maintained with cross-training and interdisciplinary support.</td>
<td>Early Childhood / PKHS</td>
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<tr>
<td>An internal reporting tool is used to track work and activities. Personnel must keep their work activity on the Zimbra Calendar and share their calendar with the GPM. Keep track of field staff activities through Zimbra.</td>
<td>CTE / Perkins</td>
</tr>
<tr>
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<td>OT / RTT</td>
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<tr>
<td>GPM visits schools with new principals for training on program requirements including program specific and cross-cutting compliance.</td>
<td>SIG</td>
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MANAGING RISK
A risk is any uncertainty about a future event that threatens an organization’s or program’s ability to accomplish its mission or that may prevent one from managing a grant according to its intent and requirements. Risk management involves identifying the probability that some future event or action will cause losses or harm in a program, analyzing and assessing those risks, and developing a plan that includes appropriate strategies and controls to manage them. An effective risk management plan works to limit the potential for losses by providing adequate training, supervision, screening and monitoring of programs, and a close look at relevant program operations. Use of the Risk Assessment Tool that is a component of the Program Compliance Monitoring Plan will facilitate characterization of grant programs as high-risk, moderate-risk, or low-risk and lead to the development of an appropriate plan to match that risk level.

Assessment
- Have the potential risks in the program been identified – i.e., areas vulnerable to compliance problems?
- Are the program’s risks regularly assessed, prioritized and documented?
- Is a risk-based strategy used to assess and manage the risks of sub-grantees?
- How can program area experts within the District assist in developing a plan to manage program risks?
- Does the risk management plan include strategies to mitigate risk factors?
- Is there a plan for monitoring implementation of the risk management plan?

Tools
- Program Compliance Monitoring Plan – Risk Assessment Component
- Training/Professional Development from OGDC
- Training/Conferences on Compliance

Best Practice Examples / Support

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<tr>
<td>Formalize the risk assessment process (to increase objectivity) and conduct risk assessments early and often.</td>
<td>Grant Compliance Office</td>
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<tr>
<td>Ensure that staff are sufficient trained in all areas of program compliance, especially those identified as “high-risk”. The Office of Grant Development and Compliance offers training on a regular basis; other agencies do as well.</td>
<td>OSS/ IDEA</td>
</tr>
<tr>
<td>Share information about risk frankly across multiple programs and departments, and, if necessary, discuss identified areas of risk with higher levels of management. Often risks can be more effectively addressed at higher levels, particularly when interdepartmental “turf” issues are involved.</td>
<td>OT / RTT</td>
</tr>
<tr>
<td>Communicate frequently with grantor about identified areas of risk; frame the communication in terms of progress toward program objectives/results from program evaluation. Seek grantor input on plans to address risks to program success as they arise.</td>
<td>Ed Tech</td>
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<td>SIG</td>
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<td>Nutrition Education</td>
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<tr>
<td>- Identify “transition” plans in the event of staff turnover – as this represents one of the greatest areas of risk in our organization. Develop a system where central office can fill in during transitions caused by turnover at school-level.</td>
<td>- CTE / Perkins</td>
</tr>
<tr>
<td>- Prioritize security for technology items vulnerable to loss/theft – as this represents a continuing area of risk in our organization. Ensure that all locations develop site-specific technology security plans and monitor to ensure that plans are implemented faithfully. Review technology security history at all locations before purchasing new technology; balance equity and security risk as competing priorities.</td>
<td>- Ed Tech</td>
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UNDERSTANDING REQUIREMENTS
By accepting external grant funds, the District agrees to comply with the general and special grant provisions and all applicable statutes, regulations, and guidelines (federal, state and local/funder-specific). The District also agrees to operate the funded program in accordance with the approved grant application and budget, supporting documents, and other representations made in support of the approved program. The notice of grant award will reference the requirements and will include items such as:

- Applicable statutory and administrative provisions
- Responsibility for administering the grant
- Financial management provisions including federal cost principles
- Administrative costs
- Allowable costs
- Record retention
- Matching requirements

Assessment
- Has the Notice of Grant Award been thoroughly reviewed and are the provisions understood?
- Are the requirements for reporting, allowable costs, and matching funds understood?
- Are the relevant federal, state or local regulations that apply to the grant understood by grant team members?
- Have questions or concerns related to requirements been raised in a timely manner to the appropriate person?
- Do grant team members and sub-grantees know which OMB circulars (or other regulatory documents) are applicable to the program and understand how to use them?
- Do the grant team members know who else in the organization is responsible for implementing parts of the grant provisions and is work coordinated across members?

Tools/Resources
- Notice of Award
- OMB Circulars
- Grantor-provided resources

Best Practice Examples / Support

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<tr>
<td>Schedule and conduct a formal review of applicable grantor requirements and regulations with all appropriate staff at initiation of grant. Develop specific plan to follow up on/answer any questions that arise during review of requirements.</td>
<td>OGDC</td>
</tr>
<tr>
<td>Maintain ongoing, direct communication with funding agency via personal contacts to address questions regarding compliance requirements as they arise during implementation. Schedule regular time for phone contact with funder.</td>
<td>Early Childhood / PKHS</td>
</tr>
<tr>
<td>Attend funder-sponsored conferences and subscribe to funder listservs to receive updates on grantor requirements</td>
<td>CTE / Perkins</td>
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<td>Title I / Non-Pub Programs</td>
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<td>Nutrition Education</td>
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<td>Point of Contact for Advice and Support</td>
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<tr>
<td>• Assign administrative personnel to reach out to schools to explain grant requirements/expectations. Follow up with school-based personnel to ensure that work is aligned to grant.</td>
<td>• OSS / IDEA</td>
</tr>
<tr>
<td>• Publish a program-specific newsletter to disseminate current information about grant requirements to school-based personnel.</td>
<td>• OT / RTT</td>
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TRANSLATING A PROPOSAL INTO A PROGRAM PLAN AND USING IT

A program plan is a detailed map for implementing a grant that describes goals/objectives and strategies for achieving them, as well as how the program will be evaluated. Usually, a detailed plan is created via the grant application/proposal writing process, though in many cases this original plan will require updating and refinement during the course of implementation. A program plan should be driven by a clear, concise overall mission statement that explains the program’s purpose and motivates all stakeholders to pursue it. The program plan should include measurable outcomes and performance measures. It is also helpful to develop a timeline and milestones for program implementation to keep the program moving towards the intended objectives. The program plan should identify the skills and tools necessary to accomplish program goals and who should be involved in each facet of the program. A crucial component of a successful program plan is to link the program goals and specific intended outcomes. The program plan should specify a system for measuring outcomes and monitoring and reporting progress in achieving them. Finally, the program plan should include a detailed budget that allocates funding for all program activities, including monitoring and evaluation. Planning effectively and then using the plan to guide action is critical to a well-managed grant.

Assessment

- Is the program’s mission clearly defined?
- Have the goals, objectives, intended outcomes and timelines for meeting goals been specified?
- Are all key stakeholders involved in the planning process?
- Has a plan for implementing and monitoring the program been developed?
- Does a plan for measuring program outcomes and reporting on progress exist?
- Is the budget clearly defined and tied it to the program operations?
- Has a system for tracking the budget been established?

Tools/Resources

- Grant proposal/application/budget

Best Practice Examples / Support

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<tr>
<td>Schedule and conduct a formal review of approved program plan with all appropriate staff at initiation of grant. Refine and expand with additional details regarding roles and responsibilities if necessary.</td>
<td>OGDC</td>
</tr>
<tr>
<td>Incorporate specific roles and responsibilities pertinent to grant implementation, drawn from the grant proposal/application, into job descriptions and hiring for program staff. Clearly communicate those responsibilities during the hiring/appointment process.</td>
<td>OT / RTT</td>
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<tr>
<td>Incorporate information about implementation plan – clarifying roles, responsibilities and expectations – into ongoing staff training.</td>
<td>OT / RTT</td>
</tr>
<tr>
<td>Engage all stakeholders, especially those external to the lead program office, in developing and reviewing the program plan. When possible, utilize existing formal meeting structures of external stakeholders to conduct review of the plan.</td>
<td>CTE / Perkins</td>
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<tr>
<td><strong>Best Practice Examples (continued)</strong></td>
<td><strong>Point of Contact for Advice and Support</strong></td>
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<td>• Conduct annual teacher surveys as vehicle for getting input on program plan, and for building school/classroom-level buy-in for effective implementation.</td>
<td>• Nutrition Education Program</td>
</tr>
<tr>
<td>• Schedule regular meetings to review data from program evaluations and progress toward stated objectives; make adjustments to program plan based on data reviewed.</td>
<td>• Office of Research &amp; Evaluation</td>
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MANAGING AND ADMINISTERING CONTRACTS AND SUB-GRANTS

Often agencies outside the District are engaged to conduct some or all of the planned activities of a grant. When this occurs, appropriately managing the work of the outside entity and the funds used to pay for the work is a key grantee responsibility. Grant Program Managers must ensure that entities selected to do the work are chosen in a fair and transparent manner, that the price paid for the work is reasonable, and that the work is performed effectively, to a high standard, and in a compliant manner.

When federal grant dollars are involved, the first responsibility of the Manager is to determine whether the engagement of the outside entity constitutes a “subgrant” or is instead the purchase of services from a “vendor.” The federal government provides guidance on how to make the “subgrantee” vs. “vendor” determination in OMB Circulars A-87 and A-133; based on this guidance, the District’s Office of Grant Development and Compliance has developed a detailed protocol to help guide Grant Program Managers through the process. Generally speaking, a “subgrantee” has much greater ownership and discretion in terms of designing and implementing a program, whereas a “vendor” simply provides pre-determined service as part of a larger program designed by the District.

Making the distinction is important, however, because subgrants involve significantly higher levels of compliance requirement on the part of the subgrantee – and significantly higher levels of monitoring on the part of District Managers. Subgrantees, unlike vendors, are responsible for complying with all the federal requirements associated with the federal grant they work on, and the District, in making a subgrant, is responsible for closely monitoring subgrantees to ensure their compliance and for reporting on their activities.

Grant Program Managers should develop a risk-based monitoring system to ensure adequate oversight of all sub-grantee funds. Grant Program Managers should communicate compliance and reporting requirements and provide sub-grantees with the training they need to implement strong programs. To help design effective training and technical assistance efforts, Grant Program Managers should conduct a formal or informal needs assessment and then develop a plan for providing training, technical assistance, and conducting site visits.

Assessment

- Has a subgrantee vs. vendor determination been made and documented?
- Has a risk-based system for assessing and monitoring sub-grantees been developed and implemented?
- Has a needs assessment been conducted to determine training, technical assistance and a site visit schedule for subgrantees?
- Does a plan for communicating with sub-grantees for training and technical assistance exist?
- Are services being provided at a high standard (vendor or subgrantee)?

Tools/Resources

- Grant Policy 600 and Grant Procedure 600.1
- Vendor vs Subgrantee Determination Form
- Grant Compliance Monitoring Plan – Subgrantee version.

Best Practice Examples / Support

The implementation of formalized and routine subgrantee monitoring is relatively new and best practices are in the process of being developed. The Office of Grant Development and Compliance will work with all offices having subgrantee relationships to improve the effort in this area.
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<tr>
<td><em>(Subgrants)</em> Meet with charter schools prior to the start of every year where to provide the Grant Compliance Monitoring tool, along with an explanation of expectations. Charter compliance documents are reviewed as received which determines if more follow-up is required including a potential site visit.</td>
<td><em>OSS / IDEA</em></td>
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<tr>
<td><em>(Subgrants)</em> Entities that have A-133 audits (if receiving $500,000 or more per year in federal funds from any source) submit their audit reports to the SDP as required and is reviewed by Grant Accounting for material findings.</td>
<td><em>Grant Accounting</em></td>
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<tr>
<td><em>(Subgrants)</em> The program office and Grant Compliance Office develop a proposed Corrective Action Plan for material subgrantee findings as disclosed on the A-133 audit. The program office works with the subgrantee to gain agreement on the Grant Corrective Action Plan and the implementation of the corrective actions are monitored by the program office.</td>
<td><em>Program office / Grant Compliance Office</em></td>
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| *(Vendors)* Incorporate a fee-for-service structure (rather than cost reimbursement) in the budget for the vendor contract, so that vendor is not paid unless service is delivered. Do not pay vendor invoices without signed verification from a District employee with firsthand knowledge that services have been delivered. | *Office of General Counsel*  
*Office of Grant Development and Compliance* |
MANAGING BUDGET AND FINANCES
Grant team members must employ sound financial management practices that make effective use of funds and provide for accurate, complete, and current disclosure and documentation of the financial results of the grant program. Managing costs includes the process of identifying all the costs associated with the grant-funded program, making informed choices about the options that will deliver the best value for grant expenditures, and managing and documenting those costs throughout the life of the award. The budget is the blueprint for cost management. The budget should be guided by the proposal and should align with available resources, and include program staffing, program administration, and evaluation. Grant provisions will provide guidance regarding changes to the budget and grantors often allow small adjustments to the budget without prior approval. In addition, all programs are subject to audit.

For federal grants, cost management also entails understanding and following cost principles embodied in OMB Circular A-87 pertaining to cost matching, allowable costs, and indirect costs. Grants Program Managers, Principals, Grants Budget Analysts and other personnel, as appropriate, are responsible for knowing all program specific financial and grants management guidance and provisions. Relevant program staff must actively manage and direct personnel and financial resources. Staff not directly responsible for directing such activity should become and remain informed of planned and actual expenditures in their areas of responsibility.

Assessment
- Does the annual grant budget allocate funding for all program activities, as well as administration and evaluation? Is funding from other sources included in the overall program budget?
- Are there sufficient administrative personnel to manage grant resources effectively?
- Is the annual budget tied to program objectives and goals?
- Are the organization’s budget, the program budget, and the sub-grantee budget (if applicable) readily obtainable?
- Are the principles pertaining to allowable costs understood and followed? Is every expenditure charged to the grant necessary, reasonable and allocable?
- Have all program-related revenues and expenses at a grant-wide level, including the methods for clearly tracking expenditures allocated to the grant, been documented in a timely manner?
- Is there a detailed monthly report at the ABC Code level for tracking expenditures against the budget for both the central office and schools (if applicable)?
- Is program budget and financial management and accountability clearly defined between the central office grant program personnel and school principal(s)?
- Does the system of internal controls include appropriate checks, balances, and review, including segregation of duties?
- Is there a plan for documenting and monitoring matching funds (if applicable) and for program sustainability after the end of the grant period?

Tools
- Advantage Financial and HR Systems
- Advantage Reports on the SDP Master Login
- Budget to Actual Reports (monthly) on the Master Login
- Budget Management System – Grants on the Master Login
- Program specific planning and financial management and tracking systems
Best Practice Examples / Support
Effective program implementation and the effective management of personnel and non-personnel resources are inextricably linked: one cannot occur without the other. However, the proper understanding of the roles and responsibilities of resource management and coordination between the central grant program office and schools, and between the central grant program office and Grant Fiscal Services (GFS) has been a consistent and on-going source of program implementation failure. Experience has shown that a central program office staffed adequately with active and effective managers who understand all roles and responsibilities not only achieves financial management success, but also is most likely to achieve the desired program outcomes as well. Before describing many of the “best practices” of effective financial management activities at the SDP, it’s important to clearly define the appropriate roles and relationships that make those best practices possible.

Roles and Responsibilities of the Central Grant Program Manager
The term “Grant Program Manager” or “GPM” in this discussion refers not only to the designated central office manager of the program, but to the support staff within the central program office as well. School Principals are also GPMs in the broadest sense, but have differentiated responsibilities as described in this document. GFS responsibilities reside with the Grant Budget Analyst who is referred to as a “GBA”. The appropriate budget and financial management roles and responsibilities of the GPM, Principal and GBA along the life-cycle of the grant are as follows.

For the Initial Grant Budget (Proposal and Award)

1. The GPM is part of the grant proposal development process and leads in the design of the program goals and objectives, the strategies to achieve them, and the inputs, both personnel and non-personnel, required for implementation.

2. A critical program design element is the distribution of central office versus Principal decision making and authority. There are merits and pitfalls to a heavy central office focus, heavy school focus, or a blended model. It must be debated and by consensus explicitly agreed and documented which model is to be implemented including the various financial and managerial controls required to ensure smooth program implementation and financial accountability.

3. For identified full-time personnel by position, the GBA has the knowledge and tools to provide annualized salary estimates including benefit amounts. The GBA also calculates and incorporates certain standard costs such as indirect costs and audit costs (if applicable). The GBA may also help with calculations related to grantor-imposed cost matching requirements.

4. For non-full time salary supplemental pay (i.e., hourly compensation for professional development or extra-curricular activities or “PD/EC”), the GPM must identify the estimated quantity of hours projected to be used in the current year and for out-years if a multi-year grant, including the hourly rate to be charged. The GBA calculates the total supplemental pay cost and the related variable benefits.

5. The GPM estimates the amount of contracted service amounts, equipment, supplies, etc. to be consumed in the current year or over each year of multiple years if applicable.

Key Concepts:

✓ The grant development team must agree on the optimal program delivery model and explicitly agree and document the budget and financial management accountability controls and systems.

✓ The GPM and GBA collaborate on the development of the grant proposal and award budget. The GPM, along with the development team, provides explanatory text and other
information on how that budget relates to the achievement of program goals and objectives.

✓ The GBA produces and prepares for submission the proposal budget in the format required by the grantor. In already established central office programs areas, the GPM may have sufficient longevity and experienced staff that they prefer to prepare the budget proposal, only needing benefit rate information from the GBA.

Award Budget and Financial Management

For non-federal and small grants, the school principal may have a high degree of program decision making authority with the central office review primarily concerned with ensuring appropriate fiscal controls and adherence to SRC policies. With regards to federal funds, once the award is made, the responsibility of actively managing the budget and finances in relation to the implementation of the program resides squarely and solely with a central office GPM. This is true even when the Principal is vested with a high degree of decision making authority as there must still be a single, accountable central office point of management review and accountability. The GBA provides overarching financial support and reporting as described (Note that the following points are geared to the management of federal funds)

6. The GPM hires qualified personnel directly or through HR, initiates the competitive selections for goods and services, and initiates and completes the Resolution and contract process to include encumbrances for LCAs and service contracts.

7. The GPM actively manages central office personnel and / or works with the Principal and school grant staff directly to ensure that program plans are being followed.

8. The GPM actively manages vendors and reviews and signs-off on vendor service invoices to ensure services were delivered as specified. This is also true in the Principal focused management model where the Principal must sign-off on vendor invoices certifying that services were rendered as prescribed. The central office GPM should ensure that the Principals are signing-off on vendor invoices.

9. The GPM must verify with the support of the GBA that the budget loaded in Advantage Financial is consistent with the approved grantor budget and consistent with the 12 month plan of expenditures for the current fiscal year.

10. The GBA processes and posts approved changes to the accounting record (journal vouchers) with the review and approval of the GPM.

11. The GPM must actively monitor expenditures against the approved program budget which should be consistent with the budget loaded in Advantage Financial. This monitoring should preferably be as frequent as possible, but no less than monthly within the program, and no less than quarterly with the GBA. The tools for this review include the Advantage Financial System, Advantage Reports and monthly Budget to Actual Reports, and the Budget Management System – Grants (the last three systems on Master Login). Importantly, there are specific management and tracking tools that can be deployed by the GPM to enhance resource monitoring and accountability both at the central office and school level.

12. It is the GPM’s responsibility to monitor expenditure to budget on a monthly (or more frequent) basis. The GBA can provide support to the GPM on the tools available to accomplish that monitoring. It is the GPM’s responsibility to manage resources which includes monitoring expenditures to determine if spending is too fast or too slow and taking corrective action. It’s the GPM’s responsibility to ensure that expenditures are being paid against the correct open encumbrance and that the three way match is timely completed for the purchase of goods. It’s the
GPMs responsibility to monitor school grant budgets and expenditures and have an open, continuous and planned line of communication with Principals regarding their current and future activity. These are key financial management tasks squarely within the responsibility of the GPM and, except as noted on a quarterly basis, should require no participation by the GBA.

If the GPM does not have the personnel expertise and/or capacity to adequately perform these functions using Advantage and the tools provided or the best practices described in this section, then the grant development team has failed to design an effective grant program over the award period.

13. For expenditure to budget monitoring on a quarterly basis, the Budget Management System – Grants is the tool designed to formally review the status of the yearly grant budget and expenditures with the GBA and GFS in order to identify issues and to jointly determine and implement corrective actions. The GPM should come to this quarterly review having consistently performed more frequent expenditure to budget monitoring at both the central office and school level with the clear understanding of the trajectory of program operations such frequent review would provide. At the quarterly review, the re-estimation of future full time personnel salary and benefits costs may be required, including supplemental pay benefit estimates. The GBA, based on the program estimates of the GPM, will provide those cost estimates. The GPM must provide a re-estimation of all non-personnel costs for the balance of the year to include central office activity and school activity, if applicable, which requires the continuous interaction with Principals and other school staff. The GPM makes the estimation updates in the Budget Management System - Grants.

The quarterly review may result in one or more of the following actions: full time personnel, supplemental pay and/or non-personnel spend is accelerated or reduced; budget amendments in Advantage Financial are required for the current year or between years within multi-year awards (which may require grantor approval); or the budget simply needs to be restructured with grantor approval in pursuit of a new program implementation strategy.

14. The GBA prepares, in coordination with the GPM, out-month and out-year full time salary and benefit estimates using the salary and benefit projection engine. The GBA calculates variable benefit costs for supplemental pay estimates provided by the GPM.

15. The GBA prepares and submits grantor required financial reports on a monthly, quarterly, or yearly basis as may be required utilizing the Advantage Financial System in consultation with and review by the GPM.

16. The GBA forecasts program cash flow needs based on interactions with the GPM, requests award reimbursements and scheduled payments and/or prepares invoices to grantors to receive money.

17. The GBA draws-down cash from the grantor based on the financial reporting.

18. The GBA analyzes expenditures to determine eligibility for additional revenues via payroll allocations from PSERS and FICA.
**Key Concepts:**

✓ The GPM is responsible for the ongoing budget and financial management of the grant to include school activities if applicable, and directing that activity in pursuit of the approved grant goals and objectives.

✓ In federal grant programs where Principals are provided a wide degree of latitude to implement the terms of the award, a strong central office GPM is still required to provide review, coordination, and programmatic and financial accountability and assurance.

✓ The GBA provides key inputs to support the GPM’s ongoing responsibilities particularly during quarterly financial reviews, and the GBA performs periodic grantor financial reporting, analyses, and cash draw downs.

✓ The GBA works with to GPM to develop the initial grant budget, a re-estimation of the current year budget, carry forward analysis, and the budget for the following year.

✓ The GBA position is not designed or responsible for executing the operational program management responsibilities of the GPM.

**Yearly Financial Close and Award Closeout**

19. Pursuant to Generally Accepted Accounting Principles and the requirement that the District produce a Consolidated Annual Financial Report, the GBA analyzes grant financial activity and determines required grant Financial Close transactions and executes those transactions with the review and approval of the GPM. For multi-year grant awards, such transactions include the transfer of allowable expenditures back to older, open awards in order to fully utilize those resources. GBAs also prepare fiscal year carry forward analysis to provide GPMs a starting point for resource program planning in the following year.

20. The GBA works with the GPM during the yearly budget development cycle to build a new estimate for the current year’s budget and the grant budget for the following year to include full time personnel, supplemental pay, and non-personnel line-items. For multi-year awards, the GBA works with the GPM to ensure that the budget development is consistent with the GBA-performed carry forward analysis, the potential new award in the following year, and the estimate of carry forward into future years.

21. The GBA prepares award financial Close-Out reports and work with the GPM to ensure all invoices are paid and related transactions are processed during the award “liquidation period”.

**Key Concepts:**

✓ The GPM is relieved of most of the grantor and District financial analysis and reporting requirements and the need to calculate carry forward amounts which is a pre-requisite for making multi-year programming decisions.

✓ While relieved of this workload, the GPM must review and approve the financial activity related to the operation of their grant.

It’s clear that there are many roles and responsibilities separately performed by the GPM and GBA. But it’s also clear that many roles and responsibilities by necessity are jointly managed and executed. A symbiotic relationship exists between the GPM and the GBA and the effectiveness of that relationship depends on an understanding of the roles and responsibilities of each, clear communication, and a professional working relationship. If that relationship is dysfunctional in any way, the situation should be made known immediately to appropriate management personnel so that the problem can be remedied.
### Best Practice Examples

- Based on the program plan, have a timetable for resolutions, contracts, and related encumbrances. Rely on GBA for personnel projections. Ensure employee allotment in Advantage is accurate and on-board personnel are personnel in Advantage are correctly coded.

- Segregation of duties within the office on entering expenditure and payroll information and for approval. Program staff review all expenditures to ensure they are allowable with the purpose of the grant and with the grantor approved budget plan.

- Using Advantage Reports and data provided by GFS, prepare a monthly budget to actual report of all program funds by source. Ensure all payments are valid and paid against the correct encumbrance. Ensure three-way match for goods is executed timely.

- Field expenditures and approval are controlled centrally. Field staff seek approval for expenditures and have continuous interaction with central program staff. Field staff submit financial activity reports weekly for review to ensure they are consistent with approved activities and plans. Expenditures that are projected to be over or under the plan are quickly addressed between the field and central staff.

- Hold once a month grant financial review meeting with all grant program personnel that administer the grants to include the GBAs. Program personnel are designated specific roles, such as ordering and tracking purchases, preparing and tracking travel (195s), etc. Staff that have proven themselves capable receive less supervision / oversight.

- Program planning to include contracts / purchases done weekly in advance to ensure meeting deadlines. Staff is sufficient and trained to ensure segregation of duties and timely program administration. Expenditures reviewed on a bi-weekly and sometimes weekly basis to ensure plans are executed as designed.

- Use Advantage, Advantage Reports and internally developed spreadsheet to track contacts, vendor payments, and good purchases. Monitor expenditure activity against budget monthly. Ensure expenditures are compliant before being processed. Tight central office control of field activity to ensure accountability.

- Tight central office program planning and control model. Schools have input into program planning. Most effective model to ensure program objectives are met consistent with the terms of the grant and sound financial management practices.

### Point of Contact for Advice and Support

- Early Childhood / PKHS
- Early Childhood / PKHS
- Early Childhood / PKHS
- OT / RTT
- Nutrition Education
- OSS / IDEA
- CTE / Perkins
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<tr>
<th>Best Practice Examples (continued)</th>
<th>Point of Contact for Advice and Support</th>
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<tr>
<td>• Use Advantage F550 screens and Advantage Reports exported to Excel to monitor expenditures against budget daily. Advantage SUSF (kickout) report reviewed daily to troubleshoot problems with purchasing. Contract and all other expenditure reports against budget produced monthly and reviewed with GPM.</td>
<td>• CTE / Perkins</td>
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<td>• Well established internal segregation of duties and allowability review process. Tight control of field activity and operations to include continuous review and formal monthly review meetings held with school personnel to monitor program and related financial activity. Specific forms and tools have been created to accomplish this monitoring. If spending is too quick or too slow, address those issues immediately with school personnel and adjust program operations accordingly.</td>
<td>• CTE / Perkins</td>
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<tr>
<td>• Specific Word and Excel templates created to be used by schools to monitor and track program and financial activity. Use Advantage System and Advantage Reports to monitor school purchasing and follow-through.</td>
<td>• SIG</td>
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KEEPING RECORDS AND DOCUMENTATION
Accurate record keeping and an organized record retention system improve grant compliance and facilitate continuity in program operations. Important documents to maintain include the notice of grant award, grant amendments, the original grant application, documents from sub-grantees, the program budget, all expenditures, any correspondence with grantor, financial reports, program progress reports, and audit and project closeout documentation. All expenditures should be appropriately documented (i.e., invoices, receipts, calculations used, brief descriptions, agendas, reports, etc.) in a manner that supports why the transactions are allowable under the grant. Grant records must be retained in accordance with the District’s record retention policy.

Assessment
- Is there a system set up for organizing important grant-related documents?
- Are financial reports and program progress reports easily accessible?
- Have all budget and expenditure-related documentation been maintained using a coherent filing system?

Tools
- **GP1400 – Documentation & Record Retention.**
- **GPM - Central Office - Record Retention + Transfer Checklist.**

Best Practice Examples / Support
The Office of Grant Development and Compliance has implemented a document scanning and database retrieval system beginning in FY14 for key documents from both schools and central offices. The key documents, such as time and effort certifications, JV Approval and backup materials, budget amendments, etc. are those historically of interest to auditors. However, grant program offices, particularly those with federal funds, must have and maintain a strong document storage and retrieval system consistent with Grant Policy **GP1400 – Documentation & Record Retention** with all documentation maintained in an “audit ready” status.

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<td>Document the transfer of records in the event of a change in grant management personnel via Record Retention and Transfer Checklist form from OGDC’s website</td>
<td>OGDC</td>
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<tr>
<td>All documentation to include student records, if applicable, and invoices, P.O.s, equipment purchase records, etc., are maintained in yearly binders and is readily available to all relevant staff.</td>
<td>Ed Tech</td>
</tr>
<tr>
<td>All time and effort documentation, lists of purchased materials and supplies by line-item and budget are maintained on spreadsheets by quarter and for schools by month.</td>
<td>Early Childhood / PKHS</td>
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<td>IDEA binder library maintained to include all relevant program files. Property ledger maintained on a shared drive.</td>
<td>Nutrition Education</td>
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<td>OSS / IDEA</td>
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CONTINUOUS REVIEW
District grant program management staff should engage in a process of continuous self assessment, reviewing both financial and programmatic aspects of the program in its entirety as well as their performance of their role within the program. Where weaknesses are found, midcourse corrections should be made.

Internally, District Grant Compliance Monitors (GCMs) will also review and evaluate programs and grant program staff from a compliance perspective. GCMs will help identify where additional training and assistance can improve program performance and compliance. Externally, the District is subject to reviews, including audits, by grantors and state and federal agencies. Auditors may conduct financial examinations of grant receipts and expenditures and/or compliance reviews to determine whether grant terms and conditions are being met. If an auditor finds problems or issues related to how grant funds were spent or the terms and conditions of a grant were complied with, audit findings may be issued. All audit findings should be addressed.

Assessment
- Is program performance and grant staff member performance regularly reviewed and are mid-course corrections made as needed?
- Have internal performance reports, including reports from site visits for the program been reviewed?
- Have the District’s or program’s prior audit findings been reviewed and addressed? Are there recurrent findings that have not been addressed?

Tools
- Audit findings and subsequent Grant Corrective Action Plan.
- Grantor monitoring visits and results.
- OGDC recommendations.
- Internal program reviews including formal or informal personnel evaluations.
- Office of Research and Evaluation review and findings.

Best Practice Examples / Support

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<td>Quarterly meetings with Program Evaluation specialists to review data and findings from formal program evaluation processes, to understand progress (or lack thereof) toward program objectives, with an eye to making midcourse program modifications as warranted.</td>
<td>ORE</td>
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<td>Frequent and consistent central office and field staff meetings to continuously assess effort at achieving program goals and for monitoring financial activity.</td>
<td>CTE / Perkins</td>
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<td>Yearly and ad-hoc compliance review of central office federal program operations (personnel and non-personnel resources) to ensure they maintain compliance with applicable federal rules, such as Supplement, Not Supplant and Allowability.</td>
<td>OGDC</td>
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