



B A S M A A

Policy and Procedure #9

Title: Grant Administration

The purpose of this policy and procedure is to establish BASMAA's policy and procedure for meeting the administrative requirements of federal or state grants received by BASMAA, which include administrative requirements above-and-beyond those already addressed by BASMAA's other policies and procedures and/or that are specific to a particular grant. Related policies and procedures are:

- *#1 Budgeting and Work Planning* – establishes BASMAA's policy and procedure for all aspects of developing and approving BASMAA's budgets and work plans, including schedule, project selection criteria, and decision-making.
- *#4 Consultant Selection and Contracting* – establishes guidelines for implementing a selection process to hire consultants to conduct BASMAA projects, including implementation of grant and loan funded projects.
- *#7 Financial* – establishes BASMAA's accounting policies and procedures.
- *#8 Funding and Accounting for BASMAA Efforts* – defines and specifies financial elements of regional efforts conducted by BASMAA.
- *#10 Grant Proposal Development* – defines how BASMAA addresses grant proposal development, including the use and standing of consultants involved in proposal development.
- *#11 Project Management and Project Deliverable Approval* – establishes authorities, and roles and duties of BASMAA project officers and standing or ad hoc committee members overseeing projects.

Reporting

BASMAA will ensure grant reporting requirements are met in a timely way by following the steps below:

1. BASMAA Project Officer and Project Manager and/or staff set a report development, review, and submittal schedule within 30 days of the signing of a contract agreement with the granting organization. The schedule will include deadlines for submittal of tax returns and single audits as applicable. The reports will include financial information as required by grants.
2. Project Officer and Project Manager and/or staff confer at the beginning of the schedule for each report to be submitted to review the schedule and make adjustments, as needed.
3. Project Officer and Project Manager and/or staff confer as each deadline in the schedule is reached to confirm report generation is on schedule.
4. If a mid-schedule deadline will not be met but the submittal deadline remains achievable, the Project Officer and Project Manager and/or staff will make adjustments as needed to still meet the submittal deadline.

5. If a mid-schedule deadline will not be met and the submittal deadline is not achievable, the Project Officer will confer with the granting organization promptly when that fact is known, and will proceed as determined in discussions with the granting organization.

Drawing Funds and Issuing Payments

Drawdowns of funds may occur as reimbursements or pre-payments to BASMAA. BASMAA will ensure the drawdown of funds and issuing of accounts payable payments has sufficient controls by following the steps below:

Authorization

The following individuals are authorized to request payments from a funding agency: BASMAA Chair and Executive Director. Whenever possible, both individuals will be registered as authorized to request payments from a funding agency at the beginning of a grant funded project.

Accuracy of requests and payments

- Requests – The accuracy of requests are ensured by the following steps:
 1. The BASMAA accountant generates an accounting of accounts payable invoices for a grant project that were paid since the previous payment / request period.
 2. The Executive Director or Chair reviews the accounting against the accounts payable invoices submitted and paid in the current period. If any question or discrepancy is identified, the Executive Director or Chair works with the accountant to address the question or reconcile the discrepancy.
 3. The Executive Director or Chair makes the payment request to the funding agency and reports the request to the accountant by providing a record (e.g., request form).
 4. The accountant confirms the amount of the request with the accounting of accounts payable invoices for the grant project that were paid since the previous payment / request period.
- Payments – The accuracy of payments are ensured by the following steps:
 1. For each payment period, the BASMAA accountant reviews the accounts payable invoices and generates a pending bills accounting of information from the invoices to be paid and the payments to be issued.
 2. The Executive Director or Chair reviews the accounting against the accounts payable invoices submitted in the current payment period. If any question or discrepancy is identified, the Executive Director or Chair works with the accountant to address the question or reconcile the discrepancy.
 3. The accountant generates the payments according to BASMAA's Accounting Procedures.

Support Documents

The following support documents are required for the draw of funds or for making payments

- Accounts payable invoices
- Accounting of accounts payable invoices
- Payment request record
- Pending bills accounting
- Payments

Timing

The Executive Director or Chair and the BASMAA accountant set a drawdown schedule within 30 days of the signing of a contract agreement with the granting organization.

Responsiveness

To avoid creating cash flow or administrative issues, BASMAA pays accounts payable invoices after the granting agency has approved them. BASMAA minimizes the time between receiving funds and disbursing them by paying accounts payable invoices within 10 days of receipt of funds from a granting agency.

System for Award Management

Within 30 days of the signing of a contract agreement to receive Federal funding, BASMAA will:

- register and update as needed information in the Office of Management and Budget (OMB) System for Award Management (SAM) and
- register and update as needed information as it relates to the Data Universal Numbering Systems (DUNS) at the SAM Internet site <http://www.sam.gov>.

BASMAA will ensure that registration in the Central Contractor Registration (CCR) remains "active" during the grant's project/budget period (until the final financial report is submitted to the Federal funding agency) on an annual basis by reviewing and updating as needed the information in the system by the anniversary date of the grant award, and more frequently if required by changes in information or another award term.

Federal Funding Accountability and Transparency Act Subaward Reporting System

To meet requirements of OMB, BASMAA will report and update information for sub-recipients in the Federal Funding Accountability and Transparency Act Subawards Reporting System (FSRS) at www.fsr.gov.

Within 30 days of the signing of a contract agreement with a sub-recipient who receives \$25,000 or more in assistance, BASMAA will report and update as needed information for the sub-recipient into FSRS.

Contract and Consultant Rates

In accordance with 40 CFR 30.27(b) regarding contract and consultant rates and to ensure that charges are allowable and follow the rates outlined by the funding organization, BASMAA will:

- Determine allowability of costs in accordance with the provisions of OMB Circular A-122, "Cost Principles for Non-Profit Organizations", and either
- Include in contracts a provision prohibiting charges that exceed the funding organization's

- allowed direct hourly rate for consultants as provided by the funding organization, or
- Include in contracts a listing of hourly rates that have been reviewed and determined to be at or below the direct hourly rate for consultants as provided by the funding organization.

Match

When a grant requires matching contributions, BASMAA:

- Establishes match agreements with agencies contributing match (Policy and Procedure: *Funding and Accounting for BASMAA Efforts*).
- Follows the provisions in match agreements (Policy and Procedure: *Financial*)