

GRANT MANAGERS
BROWN BAG

SAVING SPACE FOR FEDERAL GRANT MANAGERS

A FEW REMINDERS

OCTOBER 2025



WHY THIS TOPIC?

- New RCCD processes and procedures
- Increased scrutiny on federal awards
- Greater need for compliance
- Just because.....



EQUIPMENT TRACKING

- Federal Requirement – CFR 200.313

(d) **Management requirements.** Regardless of whether equipment is acquired in part or its entirety under the Federal award, the recipient or subrecipient must manage equipment (including replacement equipment) utilizing procedures that meet the following requirements:

- (1) Property records must include a description of the property, a serial number or another identification number, the source of funding for the property (including the FAIN), the title holder, the acquisition date, the cost of the property, the percentage of the Federal agency contribution towards the original purchase, the location, use and condition of the property, and any disposition data including the date of disposal and sale price of the property. The recipient and subrecipient are responsible for maintaining and updating property records when there is a change in the status of the property.
- (2) A physical inventory of the property must be conducted, and the results must be reconciled with the property records at least once every two years.

- Definition of Equipment
- If your grant was awarded prior to October 1, 2024, equipment is best defined as anything that costs more than **\$5,000**
- If your grant was awarded after October 1, 2024, equipment is best defined as anything that costs more than **\$10,000**

EQUIPMENT TRACKING

OPTION 1

- Grant Manager responsible for tracking equipment internally
 - Use Excel Spreadsheet to track equipment purchases and location of equipment
 - Review/update spreadsheet once a year or as equipment moves, breaks, or otherwise changes status
 - Spreadsheet must be available for presentation to RCCD's independent auditors as requested

OPTION 2

- Grant Manager can utilize RCCD's Capital Asset Inventory Management
 - RCCD utilizes Sage Fixed Asset Software
 - Allows the district to manage capital assets from acquisition to disposal
 - Addresses federal asset tagging and equipment tracking requirements
 - Managed by Chris Horeczko

EQUIPMENT TRACKING

- Sage will track the following information
 - Inventory purchased with grant funds
 - Location of said inventory
 - Age of equipment
 - Depreciation value
- Ability to generate a report of all equipment purchased with grant funds
- Allows for the scanning of asset barcodes with any Android mobile device or use a barcode scanner
- Checks in and checks out assets
- Provides an audit trail



EQUIPMENT TRACKING

To utilize Sage Software for Grant Management and Compliance

- 1) Grant Managers must add the following information to the grant requisition:
 - ✓ Indicate inventory is purchased with grant funds
 - ✓ Identify funding source; note if federal
 - ✓ For federal grants, include award number and any language required by the funding agency
- 2) This information will be used to develop asset tags and track inventory in Sage



EQUIPMENT TRACKING

- Potential Wording for Equipment Requisitions

This is a federally funded equipment purchase. Please tag accordingly.

Funding Source: Perkins Title I-C, U.S. Department of Education pass through to the California Community Colleges Chancellor's Office

Award Number: 25-C01-960

100% fully funded by federal dollars

FEDERALLY FUNDED CONTRACTS

REVENUE GENERATING



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FUND OBLIGATION



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FEDERALLY FUNDED CONTRACTS TO OBLIGATE FUNDS

- Three Types
 - Subrecipient Agreements
 - Subrecipients are included in the Grant Application and Grant Award Agreement
 - Subrecipients are partners in carrying out grant goals and objectives
 - Subrecipients have autonomy in how they spend their money in order to carry out grant activities and achieve grant goals
 - Vendor Service Agreements
 - Vendors are not grant partners
 - Vendors provide a good or a service that help the grant team achieve grant goals and objectives
 - Vendors do not have autonomy as to how their money is spent; once the good or service has been received/performed, vendor is paid
 - Consultant/Professional Services Agreement
 - Consultants are also vendors
 - Consultants provide a service
 - Consultants are paid when service is provided



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FEDERALLY FUNDED CONTRACT REQUIREMENTS

Appendix II to Part 200

Contract Provisions for Non-Federal Entity Contracts Under Federal Awards

- Identifies a series of requirements that must be attached to federally-funded contracts based on dollar amount of contract.
-

FEDERALLY FUNDED CONTRACT REQUIREMENTS

Contracts > \$2,000

- EFO clause outlined in 41 CFR Part 60
- Davis-Bacon Act (for construction, renovation, and capital improvement projects only)
- Debarment & Suspension
- Rights to Inventions (applicable to non-profit and small business only and only for experimental, developmental, or research work as defined in 37 CFR 401.2)

FEDERALLY FUNDED CONTRACT REQUIREMENTS

Contracts >10,000

- EFO clause outlined in 41 CFR Part 60
- Davis-Bacon Act (for construction, renovation, and capital improvement projects only)
- Debarment and suspension
- Termination for Cause/Convenience
- Rights to inventions (applicable to non-profit and small business only and only for experimental, developmental, or research work as defined in 37 CFR 401.2)
- Solid Waste Disposal Act/Procurement of Recovered Materials

FEDERALLY FUNDED CONTRACT REQUIREMENTS

Contracts between \$100,000 and \$150,000

- EFO clause outlined in 41 CFR Part 60
- Davis-Bacon Act (for construction, renovation, and capital improvement projects only)
- Debarment and Suspension, Byrd Anti-Lobbying
- Termination for Cause/Convenience
- Contract Work Hours/Safety Standards Act
- Rights to Inventions (applicable to non-profit and small business only and only for experimental, developmental, or research work as defined in 37 CFR 401.2)
- Solid Waste Disposal Act

FEDERALLY FUNDED CONTRACT REQUIREMENTS

Contracts >\$150,000

- EFO clause outlined in 41 CFR Part 60
- Davis-Bacon Act (for construction, renovation, and capital improvement projects only)
- Debarment & Suspension
- Byrd Anti-Lobbying
- Termination for Cause/Convenience
- Contract Work Hours/Safety Standard Act
- Rights to Inventions (applicable to non-profit and small business only and only for experimental, developmental, or research work as defined in 37 CFR 401.2)
- Clean Air Act/ Federal Water Pollution Control Act
- Solid Waste Disposable Act

WHAT DOES THIS MEAN FOR GRANT MANAGERS?

- General Counsel reviewed and approved templates for both Subrecipient Agreements and Vendor Agreements, particularly agreements that provide services
- Inclusion of Grants and Sponsored Programs in the Approval Queue in the District's new automated Contract Transmittal Process in On Base

In Contract Development, Grant Manager is responsible for:

- Statement of Work
- Budget
- Reporting Requirements
- Invoicing Timeline
- Sole Source Justification

GRANT SPENDING – FINANCIAL MONITORING

- We need to spend our federal funds on time and in accordance with the Approved Statement of Work and Budget.
 - We need to monitor our subrecipient agreements as well.
 - Federal agencies can and will reduce the size of the grant award if the project is significantly underspent.
 - Large invoices and/or drawdowns at the end of a grant can trigger increased scrutiny.
- **§ 200.329 Monitoring and reporting program performance.**
 - (a) ***Monitoring by the recipient and subrecipient.*** The recipient and subrecipient are responsible for the oversight of the Federal award. The recipient and subrecipient must monitor their activities under Federal awards to ensure they are compliant with all requirements and meeting performance expectations. Monitoring by the recipient and subrecipient must cover each program, function, or activity.

GRANT SPENDING – FINANCIAL MONITORING

Strategic Outcome (2025 – 2030)

Reduce the amount/percent of carry-over on the District's grants, including local, state, and federal, public and private.

GRANT SPENDING – FINANCIAL MONITORING

Got Carry Over?

Questions to Ask:

- 1) Where was the money not spent?
- 2) Will you need to spend funds for this task/purchase to achieve project outcomes?
- 3) Do you have the authority to redirect funds?
- 4) How else might you spend the money to achieve grant objectives and outcomes?



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GRANT SPENDING – FINANCIAL MONITORING

If you need help with any of the following:

- Revising your approved work plan and/or budget
- Identifying allowable and relevant alternatives to the initial plan – being creative
- Moving through college or District processes in a timely and efficient manner
- Any other roadblocks to spending



Please Reach Out to Your Grant Team

GRANT REPORTING

- Performance Reporting is required
- Historically straightforward
 - Compare grant progress with the Approved Statement of Work, including Goals, Objectives, and Outcomes, as well as Budget
 - Note any unexpected challenges
 - Explain why established goals or objectives were not met and/or are behind schedule
 - Identify a corrective action plan

200.329 (c) 2

As applicable, performance reports should contain information on the following:

- (i) A comparison of accomplishments to the objectives of the Federal award established for the reporting period (for example, comparing costs to units of accomplishment). Where performance trend data and analysis would be informative to the Federal agency program, the Federal agency should include this as a performance reporting requirement.
- (ii) Explanations on why established goals or objectives were not met; and
- (iii) Additional information, analysis, and explanation of cost overruns or higher-than-expected unit costs.

GRANT REPORTING

But it's 2025

- Do not reference Diversity, Equity or Inclusion even if it's in the approved plan
- If project has activities that do not align with the Trump administration priorities, do not report on them (also do not continue to spend funds on those activities)
- Say less if you are even remotely concerned about the “allowability” of grant activities

We may need to justify our drawdowns and provide additional information; the above applies



FINALLY

Breathe????

Is that too cliché to say?

We are all in this together.

You are not alone.

QUESTIONS???

