Grant Administration

Keys to Knowing and Understanding Compliance Requirements

Speakers

Alyssa G. Martin, CPA
Dallas Executive Partner,
Risk Advisory Services

Daniel Graves, CPA
Austin Partner,
Risk Advisory Services

Practice emphasis in governance, risk management, compliance, internal audit, grant management and business process improvement.
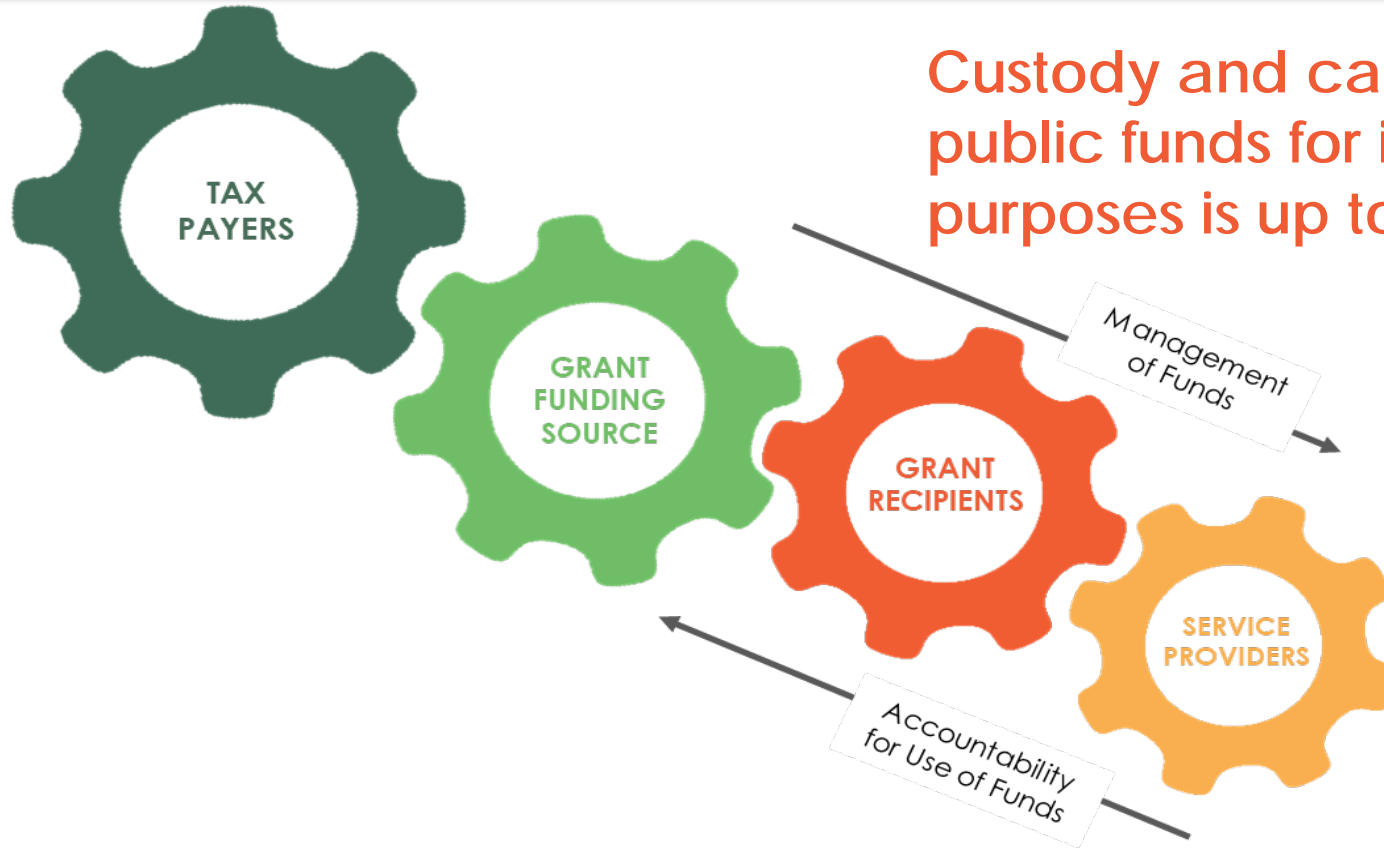
Today's Topics

- ► Grant Management Overview
- ► Identifying Compliance Requirements Using Federal and State Guidance
- ► Grant Risks and Common Pitfalls
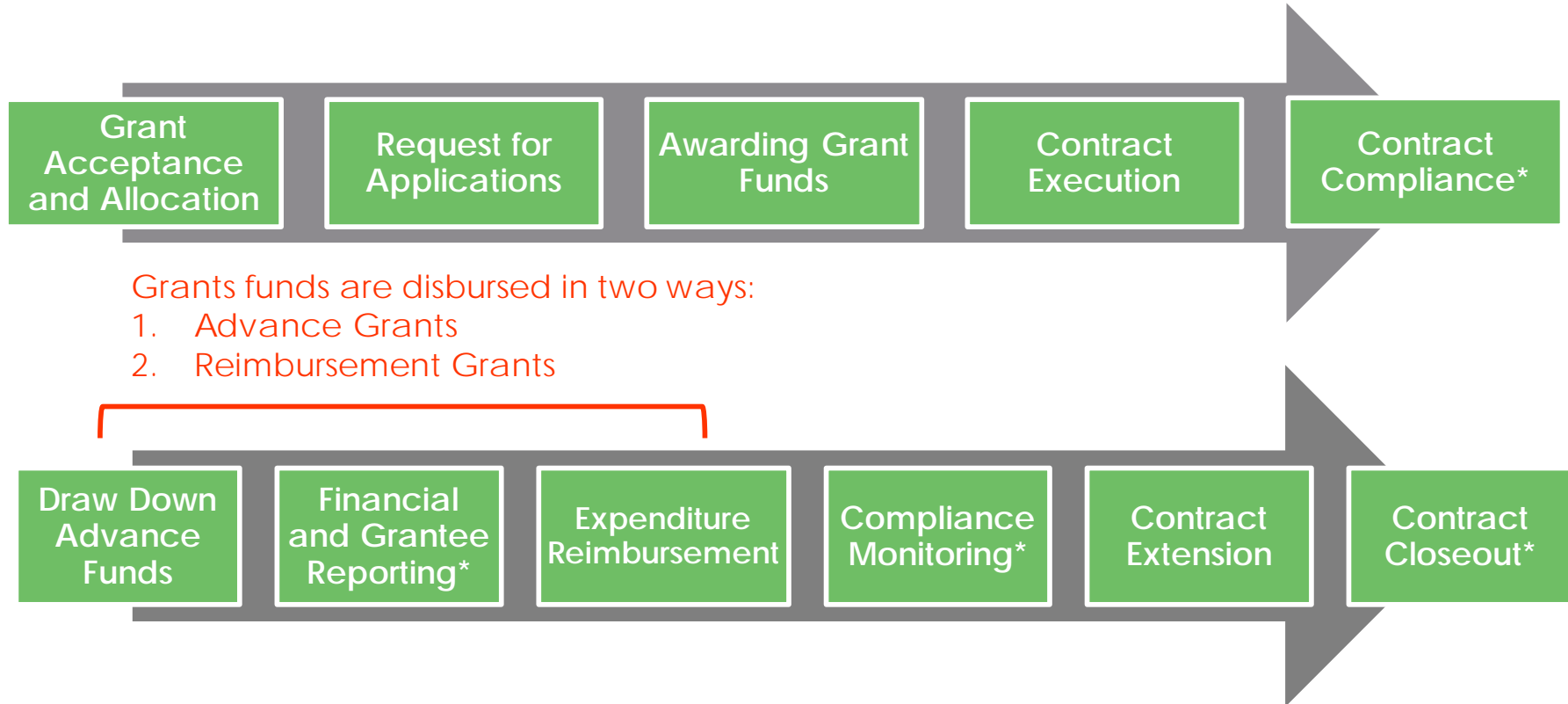- ► Designing Effective Internal Controls for Compliance

Overview

- Effective grant management is a **collaborative** approach to managing and administering grants enabling all stakeholders involved to:

  » Meet the **mission** of the grant and organizations

  » Efficiently and effectively use grant funds, while maintaining **compliance** with grant requirements

  » Establish **accountability** for the use of grant funds

  » Provide **assurance** funds are deployed appropriately

- Grant management can be centralized or decentralized, but **coordination** with all parties is key for compliance
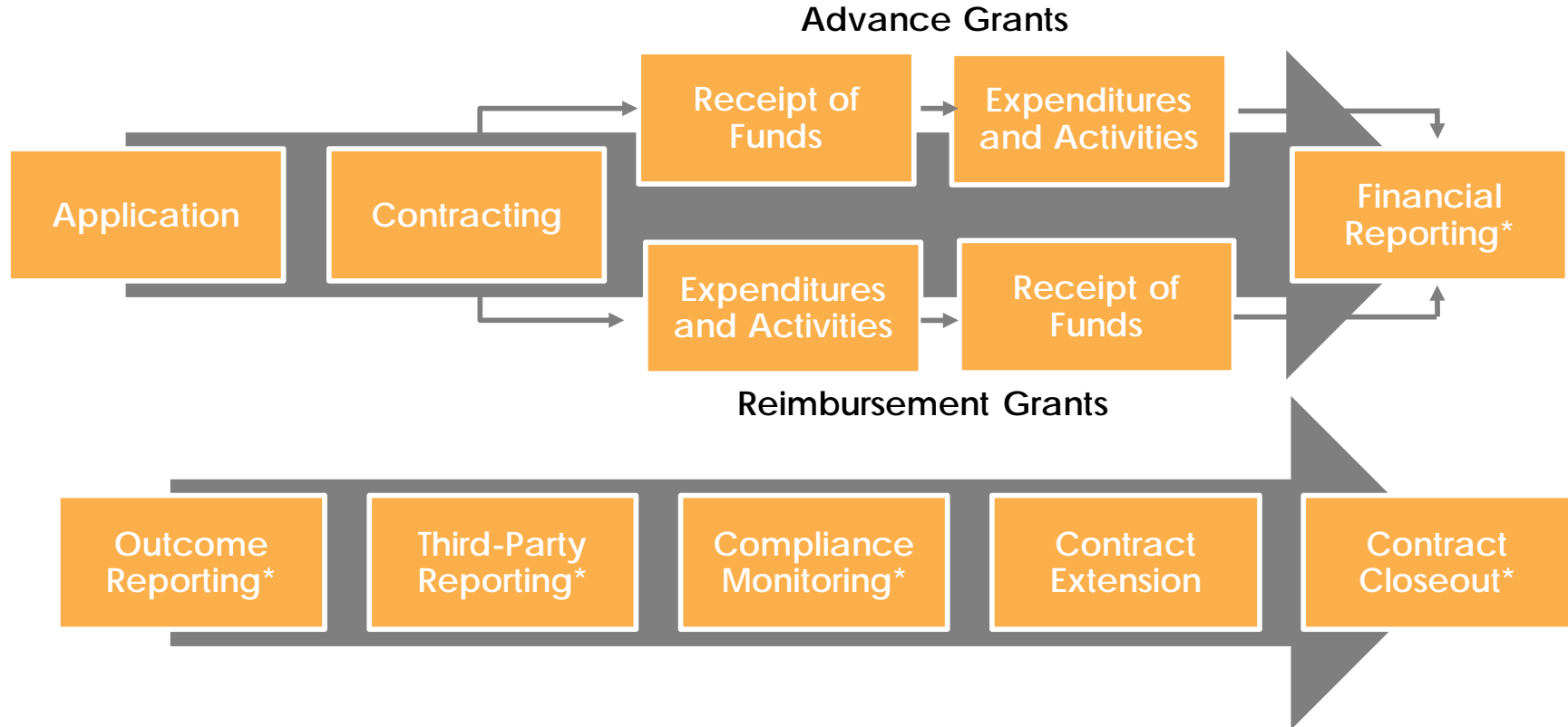
Grant Stakeholders

Custody and care of deploying public funds for intended purposes is up to you!

- TAX PAYERS
- GRANT FUNDING SOURCE
- GRANT RECIPIENTS
- SERVICE PROVIDERS

Management of Funds

Accountability for Use of Funds

The Grant Cycle (Grantor)

| Grant Acceptance and Allocation | Request for Applications | Awarding Grant Funds | Contract Execution | Contract Compliance* |

Grants funds are disbursed in two ways:
1. Advance Grants
2. Reimbursement Grants

| Draw Down Advance Funds | Financial and Grantee Reporting* | Expenditure Reimbursement | Compliance Monitoring* | Contract Extension | Contract Closeout* |

The Grant Cycle (Grantee)

KNOWING YOUR COMPLIANCE REQUIREMENTS

Determining Your Criteria

Each grant is unique, and each contract has its own terms, conditions and requirements.

Identify and know the following:

- » Contract amount and terms
- » Scope of work
- » Key contacts
- » Allowable vs. unallowable costs
- » Funding sources and applicable guidance
- » Reporting requirements

Compliance Standards

Federal Standard
Uniform Grant Guidance 2 CFR 200 (Super Circular)
- » Streamlines grant administration by creating uniform regulations for cost principles and audit requirements
- » Focuses on performance over compliance

State Standard
Uniform Grant Management Standards
- » Adopted June 2004
- » Revised March 2016 (Updated State Single Audit Threshold to $750,000)

Uniform Guidance: Six Sections

Subpart A

Acronyms and Definitions

» *Terms and definitions that apply to all non-federal entities*

Subpart B

General Provisions

» *Establishes uniform administration requirements, cost principles, and audit requirements for federal awarding agencies*

Subpart C

Pre Federal Award Requirements

» *Requirement to define grant award methods*
» *Sets requirements for application evaluation for granting agencies*
» *Defines eligibility requirements*

Uniform Guidance: Six Sections

Subpart D

Post Federal Award Requirements

» *Establishes standards and requirements for all areas of the grant*
» *Financial and program management, performance reporting, monitoring and reporting, etc.*

Subpart E

Cost Principles

» *Defines cost requirements for direct and indirect costs*
» *Sets standard indirect cost rates and requirements for pass through entities*

Subpart F

Audit Requirements

» *Prescribes single audit thresholds for programs*
» *Defines criteria for low and high risk programs*
» *Describes reporting requirements*

OMB Compliance Supplement

- Issued by the Office of Management and Budget (OMB)

- Identifies important **compliance requirements** of the Federal Government expected to be considered as part of an audit

- Provides an **efficient and cost-effective** approach to performing research on individual programs

OMB Compliance Supplement

► Source of information to understand:

  » *Federal program's objectives, procedures, and compliance requirements* **relevant** *to the audit*

  » *Audit objectives and suggested audit procedures for determining compliance*

► Updates and changes issued **April 2018**

► A full Supplement was not issued for 2018; the 2017 and 2018 Supplements must be used together

  » *A new matrix is not included in the 2018 update*

  » *Matrices in Parts 4 and 5 must be used together*

OMB Compliance Supplement

▶ **Part 1:** *Background, Purpose and Applicability*

▶ **Part 2:** *Compliance Requirements Matrix*

▶ **Part 3:** *Compliance Requirements*

▶ **Part 4:** *Individual Compliance Requirements (for each CFDA, by department)*

OMB Compliance Supplement

- **Part 5:** *Clusters of Programs*

- **Part 6:** *Internal Control*

- **Part 7:** *Guidance for Auditing Programs Not Included in the Compliance Supplement*

- **Appendix 5:** *List of Changes*

Part 2: Compliance Matrix

Identify the Catalog of Federal Domestic Assistance (CFDA) number of the grant

Use the matrix to identify the requirements

Reserved for future use

CFDA	Types of Compliance Requirements													
	A. Activities Allowed or Unallowed	B. Allowable Costs/Cost Principles	C. Cash Management	D. Reserved	E. Eligibility	F. Equipment and Real Property Management	G. Matching, Level of Effort, Earmarking	H. Period of Performance	I. Procurement and Suspension and Debarment	J. Program Income	K. Reserved	L. Reporting	M. Subrecipient Monitoring	N. Special Tests and Provisions
11 – Department of Commerce (DOC)														
11.300 11.307	Y	Y	Y		N	Y	Y	Y	N	N		Y	Y	Y
11.557	Y	Y	Y		N	Y	Y	Y	N	Y		Y	Y	Y
12 – Department of Defense (DoD)														
12.400	Y	Y	Y		N	N	Y	Y	Y	N		Y	Y	N
12.401	Y	Y	Y		N	N	Y	Y	Y	Y		Y	Y	N
14 – Department of Housing and Urban Development (HUD)														
14.157	Y	Y	Y		Y	N	N	N	Y	N		Y	N	Y
14.169	Y	Y	Y		N	N	N	Y	Y	Y		Y	Y	N
14.181	Y	Y	Y		Y	N	N	N	Y	N		Y	N	Y
14.182 14.195 14.249 14.856	N	N	Y		Y	N	N	N	N	N		Y	N	Y
14.218 14.225	Y	Y	Y		N	Y	Y	Y	Y	Y		Y	Y	Y

Part 3: Compliance Requirements

weaver
Assurance • Tax • Advisory

A. Activities Allowed or Unallowed
Specifies activities that can or cannot be funded under a specific program

B. Allowable Costs/ Cost Principles
Specifies costs that can or cannot be funded under a program

C. Cash Management
- Reimbursements & advances are properly supported & managed
- Interest earned on advances is remitted to grantor

E. Eligibility
Participants meet program criteria to receive grant funding

F. Equipment & Real Property Mgmt
Management, use & disposal of equipment and real property

G. Matching, Level of Effort, Earmarking
M - required cost share
LOE – required participation from period to period
EM – setting aside funds for a purpose

H. Period of Performance
Expenditures are within the granting period

I. Procurement & Suspension/Debarment
- Comply with federal & state procurement laws
- Vendors not suspended and debarred

J. Program Income
Income generated by federal funds used for program expenses

L. Reporting
- Performance
- Financial
- Special

M. Subrecipient Monitoring
Monitoring pass-through funding

N. Special Tests and Provisions
Unique requirements of individual grants

Part 7: Missing CFDA #s

- ► Not all federal financial assistance programs are included in the OMB *Compliance Supplement*

- ► Federal programs not included in Part 4 compliance requirements can be found in:

  - » *Grant agreement, grant application or notice of grant award*
  - » *Process documentation or other internally prepared information related to operation and requirements of the grant*
  - » *Communication from grantor regarding requirements*
  - » *Review program specific websites*

Compliance Reporting

▶ Financial Reporting

- » Grant recipients must prepare appropriate financial statements, including Schedule of Expenditures of Federal Awards (SEFA)
- » Reports must be submitted within 30 calendar days of receiving auditor's report, or within 9 months after the end of the audit period

▶ Financial Status Reports (FSRs)

- » FSRs must include all costs to be reimbursed by the grant funds
- » Must be submitted at least quarterly, but not more frequent than monthly
- » Failure to submit reports timely may result in unreimbursed costs

Compliance Reporting

▶ **Programmatic Reporting**

» Individual grants have different programmatic reporting requirements, based on the grant contract

» Careful review of the grant contract to identify compliance requirements will identify reporting requirements

» State Criminal Justice and Homeland Security Division grants must report programmatic progress through the Public Policy Research Institute (PPRI) at Texas A&M

State Single Audits

State Single Audits are performed in accordance with the State of Texas Uniform Grant Management Standards (UGMS)

- ► Single Audit is required if entity expends **$750,000** or more in State Awards – changed from $500,000
- ► Amount to distinguish between Major and Non-major Programs = **$300,000**
- ► Compliance requirements mirror Uniform Guidance requirements

Local Awards

- ► No specific requirements to be audited

- ► An individual local agency may require a program specific audit in addition to the financial statement audit

- ► If a program specific audit is required, verify (*and verify again*) that the local agency is not a pass-through from a state or federal agency

GRANT RISK CONSIDERATIONS

Risk Considerations

The primary risks associated with grants and ineffective grant management include:

- ► Misuse of grant funds
- ► Failing to achieve the grant objectives
- ► Violating laws, regulations, or grant conditions
- ► Misrepresentation of grant results
- ► Reputational damage from grant misuse

These risks affect each phase of the grant, including pre-award, award, and post-award processes.

Key Risk Types

- **Corruption**: bribery or other improper uses of entrusted power for personal gain
    - » *Ex: utilization of grant resources for kickbacks or bribes*

- **Fraud**: party to the transaction is dishonest and seeks opportunities to profit from the transaction
    - » *Ex: misrepresentation of results or theft of grant resources*

Key Risk Types

▶ **Moral Hazard**: a party to a transaction has not entered into a contract in good faith; has provided misleading information about its assets, liabilities, or credit capacity, or has an incentive to take unusual risks at the expense of the grantor

  » *Ex: accepting a grant knowing it cannot be performed as requested*

Key Risk Types

▶ **Reputation**: negative public perception related to the unsuccessful achievement of grant goals and/or poor grant governance

  » *Ex: headline news, awarding aid to parties that are unprepared to successfully meet the goals of the grant*

▶ **Performance**: unable to complete a project successfully, or unable to organize resources in a way that will successfully fulfill the objectives established by the grantor

  » *Ex: intended beneficiaries failing to receive the expected goods or services due to weak governance and management*

Common Pitfalls and Audit Issues

▶ **Missing** or **incomplete** supporting documentation

- » *Expenditures*
- » *Cost Allocations*
- » *Indirect Costs*
- » *Budget Amendments*
- » *Budget Transfers*
- » *Program Changes*

▶ Lack of appropriate approvals of expenses, reports, etc.

▶ Untimely reporting to the Grantor

▶ Inappropriate or **unallowable expenditures**

▶ Lack of achievement of performance metrics

Audit Issues: Common Causes

- ► Lack of established policies and procedures
- ► Lack of coordination in a decentralized grant management function
- ► Limited understanding of reporting/compliance requirements
- ► Internal control deficiencies:
  - » *Oversight and Authorization*
  - » *Purchasing (including cost coding) and Disbursements*
  - » *Program Operations*
  - » *Information Technology*
- ► Lack of management coordination oversight of grant amounts, usage, and administration
- ► Lack of internal reviews or audits of grant files

Avoiding Pitfalls

► Understand your grant administration processes

► Ask the following questions:

» *How many grants do we have?*
» *What are the funding sources?*
» *Who is responsible managing the grants?*
» *What are our grant requirements?*
» *What have been our past issues?*
» *Does adequate documentation exist?*
» *Are the current controls adequate?*

Avoiding Pitfalls

► Identify weaknesses and control gaps
  » *Involve Internal Audit*
  » *Coordinate with program managers*
  » *Policies and procedures*
  » *Remember your funding agency for assistance*

► Determine appropriate remediation steps and timelines

► Focus on high risk areas and compliance
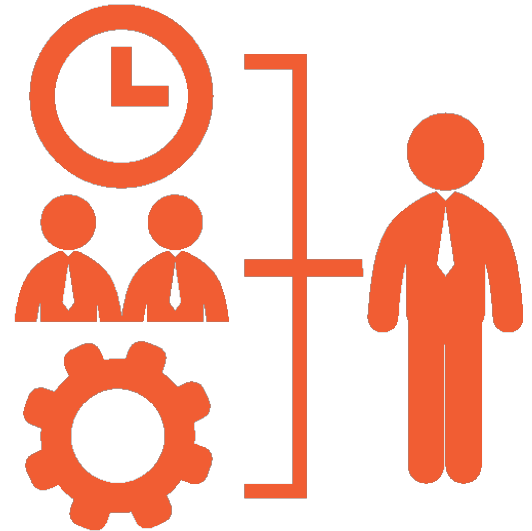
People

Process

Technology

GRANT MANAGEMENT SYSTEMS AND INTERNAL CONTROLS

Management Systems

Organizations are expected to have systems, policies and procedures in place for managing funds and activities.

Effective Management Systems

- ► Effective management systems include the following:
  - » Clear delineation of roles and responsibilities
  - » Written policies and procedures
  - » Training
  - » Internal controls
  - » Effective oversight
  - » Information sharing
- ► Systems must provide reliable and current information
- ► Management systems should be driven by policy rather than process
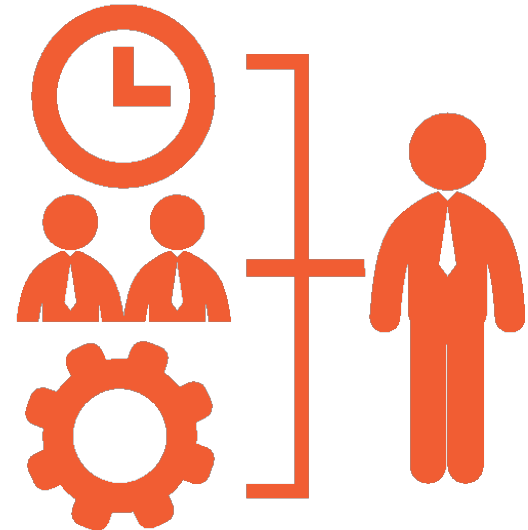
Control Considerations

Effective internal controls ensure successful grant management, administration, and compliance.

- ▶ Defined and communicated objectives
- ▶ Defined and disseminated policies and procedures
- ▶ Project management and grant training
- ▶ Senior management approval on the application and utilization of grants
- ▶ Effective IT systems to track grant fund usage
- ▶ Management oversight and approval of grant reports
- ▶ Centralized and electronic documentation of grant support
- ▶ Tracking of grant timelines and milestones
- ▶ Timely and accurate reconciliations

Effective Internal Controls

Organizations must establish and maintain effective internal controls over grant awards to provide reasonable assurance that awards are managed in compliance with laws and regulations.

- ► Internal controls should align with either:
    - » *Standards for Internal Control in the Federal Government (Comptroller General of the United States) or State Government (State of Texas Comptroller)*
    - » *Internal Controls Integrated Framework (Committee of Sponsoring Organization of the Treadway Commission [COSO])*

- ► *Policies and procedures must be in writing (IT included)*
- ► *Management must exercise judgment in determining the most appropriate and cost effective internal control in a given circumstance*

Internal Controls: Examples

- ► Written policies/procedures
- ► Segregation of duties
- ► Approval and authorization
- ► Verification
- ► Physical restrictions
- ► Documentation
- ► Monitoring and reporting

Internal Controls for Compliance

Funds are provided to grantees, processed and accounted through their internal controls. Key areas where risk should be considered include:

- ► Management Control Design
- ► Accounting Information Systems and Access
- ► Purchasing and Accounts Payable
- ► Expenditures
- ► Human Resources and Payroll
- ► Cash and Treasury Management
- ► Asset Inventory/Property Management
- ► Preparation of Journal Entries
- ► Financial Close
- ► Financial Reporting

Risk and Control Identification

Analysis of risks and controls helps to identify potential risks and mitigating internal controls.

Risk Scenario Category	Risk	Impact (L – M – H)	Likelihood (L – M – H)	Control	Residual Risk (L – M – H)
Reputational	Negative publicity on grant use	H	M	- Policies and Procedures - Governance - Management Oversight	M

Internal Control Areas of Focus

1. Management Control Design
2. Accounting Information Systems and Access
3. Purchasing and Accounts Payable
4. Expenditures
5. Human Resources and Payroll
6. Cash and Treasury Management
7. Asset Inventory and Property Management
8. Preparation of Journal Entries
9. Financial Close
10. Financial Reporting

Management Control Design

Issues	Risks	Prevention
Segregation of duties is not feasible due to the size of the accounting department, and compensating controls are not instituted.	**Inappropriate system access** creates endless opportunities for errors and fraud, including creating fictitious vendors and grant recipients, creating fictitious payments, concealing theft, posting erroneous transactions, and beyond.	Institute **review** and **authorization** procedures when segregation of duties is not possible.
Access to data and transaction files is not appropriately restricted.	Ability by one person to **generate transactions** and set up or **change the data** related to the entities involved in the transactions allows transactions involving fictitious entities and incorrect amounts to be processed fraudulently or erroneously.	**Segregate** maintenance of data from access to transaction files.
The Delegation of Authority Matrix does not exist, is outdated, or is poorly-documented.	Transactions may not be reviewed and approved by the appropriate supervisory personnel, resulting in numerous potential control issues.	Establish a formal process for **periodically reviewing** the Delegation of Authority Matrix to ensure effectiveness.
Matching funds reported as dedicated to grant-funded projects are not used for those projects.	Grantees are in **violation** of grant policies and could lose funding.	Establish these funds as **restricted** and require **supervisor review** of coding.

Accounting Information Systems and Access

Issues	Risks	Prevention
The **preparer** of journal entries has the ability to **post** the entries.	Fictitious or erroneous journal entries are recorded and not detected timely, resulting in financial statement errors	**Configure** the system to prohibit access to both functions by a single user.
Multiple employees are assigned administrative roles with **unrestricted access** for convenience.		
Roles or groups assigned to individuals are not commensurate with their functions within the company.		

Issues	Risks	Prevention
The **system administrator** is a member of the **accounting staff**.	Inappropriate system access creates endless opportunities for errors and fraud, including creating fictitious vendors and grant recipients, creating fictitious payments, concealing theft, posting erroneous transactions, and beyond.	The accounting system administrator should be **independent** of any **accounting functions.**
User access to critical systems is **not reviewed** despite position and duty changes.		Create a formal process for **periodically reviewing** user access to critical systems.
The system does **not prevent** transactions from being posted to prior periods.	Fraudulent and erroneous postings in the wrong periods may cause cut-off issues, resulting in reporting errors.	**Configure** the system and accounting processes to **prohibit** posts to closed periods.

Purchasing and AP

Issues	Risks	Prevention
Credit memos are **not reviewed** for accurate and complete processing.	These transactions are often not processed accurately and completely.	Create a formal process for **processing** and **reviewing** credit memos.
Vendor set up and editing functions are **not segregated** from the accounts payable function.	Employees can create and pay fi...	**Separate** vendor master file access from the accounts
Accrual entries are **not reversed.**	U... c... p...	

Issues	Risks	Prevention
Use of vendors does **not require** formal **review** and **authorization**.	Payment to fictitious vendors or other transactions and payments that are not in the organization's best interest could occur.	**Institute** a formal **vendor review** and approval process.
Vendor information changes, continued existence, and conflicts of interest **are not monitored**.	Payment to fictitious vendors or other transactions and payments that are not in the organization's best interest could occur.	Establish a formal process for periodically **monitoring** the **vendor database** for validity and relation to the organization and its employees.

Expientures

Issues	Risks	Prevention
Direct administrative costs (DAC) are charged to the **wrong** funding streams.	Expenses charged to projects do not accurately reflect the expenses incurred by the projects, allowing for errors and manipulation of costs.	Require **recording** of administrative time spent throughout the day, and attach this **documentation** to DAC expense journal entries. Require **reviews** of entries and supporting documentation.
Expenses are **coded** to the **incorrect** general ledger account.	Unallowable expenses or costs associated with other funding streams could be included on invoices.	Ensure effective **review** and **authorization** and reconciliation controls are in place to prevent incorrect coding.
Expenditure rates are **not checked** against funding stream expenses.	An inappropriate expenditure rate may be used.	Institute procedures to **track** funding stream expenses against pro rata use and **compare** the results to expenditure rates used.
Expenses for traditional contractors are **erroneously coded** to the subcontractor line item on the request for reimbursement.	Incorrect information is reported, in violation of contract policy.	Review contract definitions and require **supervisor review** of coding, checking for this issue in particular.

Human Resources and Payroll

Issues	Risks	Prevention
New hire procedures are **not formally documented**, and activities such as performance of background checks, drug testing, and granting of system access **cannot be verified**.	Undetected drug use, criminal background, and credentials create system exposure that results in the wrong people accessing the systems. Err exf Also ap dif co	
Access to payroll data is **not** periodically **reviewed** for appropriateness.		

Issues	Risks	Prevention
Payroll charged to funding streams **does not match** time studies.	Expenses charged to projects do not accurately reflect the expenses incurred by the projects, allowing for errors and manipulation of costs.	Conduct regular **time studies** and **allocate** payroll charges accordingly. If system automation is not used, institute **reviews**.
Editing of **employee master files** is **not segregated** from payroll processing.	Employees may increase pay or initiate supplemental pay without detection.	**Segregate** human resources activities related to employee master file changes from payroll processing.
Termination checklists are not performed. Termination procedures **do not include formal evidence** that access to critical systems was removed upon termination.	Continued access by terminated personnel to critical applications enables them to create and perpetuate errors and fraud.	Establish **termination procedures** and **checklists** that include **evidencing removal** of terminated employees from critical systems and review of that evidence.

Cash and Treasury Management

Issues	Risks	Prevention
Access to check stock is not appropriately restricted.	Employees could created passable checks to themselves or, with proper access, could create official checks to themselves.	Use physical controls, such as **locked cabinets**. Ensure access to the keys is also limited.
Responsibilities for receipt of cash, logging of receipts, and preparing bank deposits are often **not segregated**.	Erroneous transactions and theft could go undetected.	**Segregate** cash receipts from logging of receipts and preparing bank deposits.
Check pre-lists are **not compared** to printed checks.	Unauthorized disbursements may be made.	Establish a formal process for creating check **pre-lists** and **comparing** them to printed checks.
Bank reconciliations are not formally **reviewed** and **approved** by supervisory personnel on a timely basis.	Erroneous or fraudulent activity is not detected timely.	Establish **deadlines** for supervisory personnel to review and approve bank reconciliations.

Asset Inventory and Property Management

Issues	Risks	Prevention
Asset **inventory** is **not** appropriately **tracked** in accordance with contractual requirements.	Theft of assets may increase and remain undetected.	**Tag** and **track** assets in accordance with contractual requirements.
Access to the asset physical **inventory listing** is not appropriately restricted.		**Segregate** access to the physical asset listing from performance of the physical inventory and custody of the assets.
Physical inventory is **not taken** annually.		Establish procedures to conduct physical asset inventory **annually.**
Asset classification and useful lives are **not formally defined** and **documented.**	Depreciation expense is inaccurately calculated, and fixed asset values are misstated.	Establish policies and procedures for determination of **asset classification** and **useful lives** and reviews to ensure they are followed.

Preparation of Journal Entries

Issues	Risks	Prevention
Preparation and **posting** of journal entries is **not segregated.**	Fictitious or erroneous journal entries are recorded and not detected timely, resulting in financial statement errors and undetected fraud.	**Segregate** preparation and posting of journal entries.
Journal entries are **not compared** to supporting documentation prior to posting.		Require supervisor **review** and **approval** of journal entries, including review of supporting documentation.
Reconciliation of general ledger accounts is **not segregated** from the posting of journal entries.	Errors and fraud may not be detected, resulting in increased asset misappropriation and financial statement errors.	**Segregate** reconciliation of general ledger accounts from the posting of journal entries.

Financial Close

Issues	Risks	Prevention
Asset and liability accounts are **not reconciled** monthly.	Errors and fraud may not be detected, resulting in increased asset misappropriation and financial statement errors.	Establish procedures for asset and **liability account reconciliation**, requiring supervisory review and approval.
General ledger account reconciliations are **not reviewed** and **approved** by appropriate supervisory personnel.	Errors and fraud may not be detected, resulting in increased asset misappropriation and financial statement errors.	Establish **deadlines** for supervisory personnel to **review** and **approve** general ledger account reconciliations.
There is not a formal general ledger **cut-off.**	May create cut-off errors and prevent timely closing of the books.	Create a formal general ledger **cut-off calendar** and institute system controls that prohibit posting to closed periods.
A formal **walkforward** of general ledger accounts is **not performed.**	General ledger errors may not be detected.	Perform a **walkforward**, adding the **period balances** of each GL billed to grant and **reconcile** that to the latest billing report.

Financial Reporting

| Issues	Risks	Prevention
Financial and progress reports are **not submitted** to grantor **timely.**	Grantees are in **violation** of grant policies and could lose funding.	Establish general ledger closing and other **deadlines** and **review progress** to ensure the final deadlines are met.
Financial statements and trial balances are **not reviewed** by appropriate supervisory personnel.	Errors and fraud may not be detected, resulting in increased asset misappropriation and financial statement errors.	Establish procedures for supervisory personnel to **review** and **approve** financial statements and trial balances, prohibiting continuation of processes without evidence of approval.
There is not a **formal schedule** detailing the **accrued expenses** included on the billing.	Goods and services are **not properly accrued** when they are received, causing errors in billings and liabilities.	Create an **accrual schedule** for each billing which identifies all services and goods which have been received but for which the invoice has not been received.

Preparation for Grant Monitoring

Stay on target by adequately preparing for your financial and performance monitoring review.

► Ensure all policies and procedures are up-to-date and address all requirements for the grant

► All supporting documentation is complete

► Grant staff are available to answer questions and provide information on transaction details

► Cooperate with the third party reviewers or the grantor by providing documentation and answering questions timely

Engage Internal Audit

Internal Audit can provide assistance throughout the Grant Activity phases
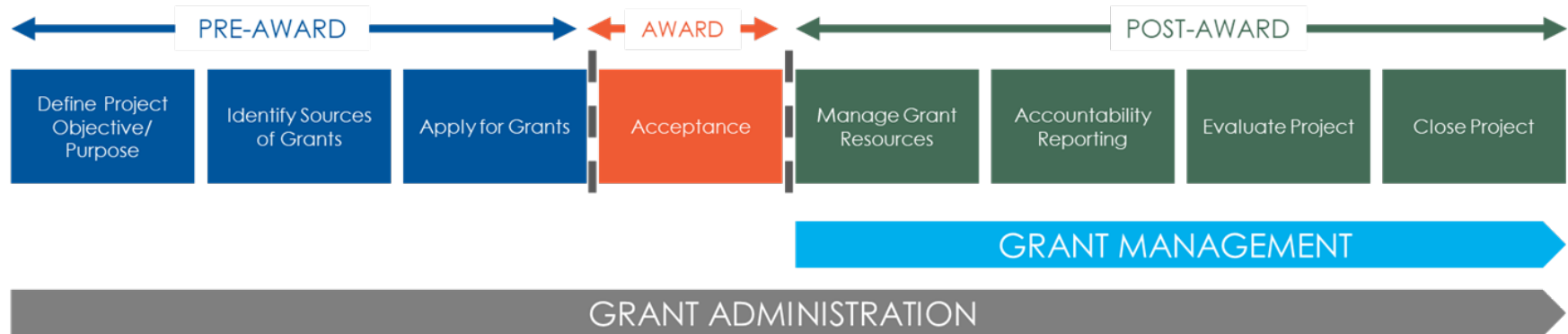
The Internal Audit function can provide assistance to ensure effective grant management and successful compliance reviews:

» *Internal Control evaluations* *or internal audits of the Grant Management processes*

» *Consultative assistance at meetings with grantors (or grantees)*

» *Assistance with crafting management* *responses to audit findings*

» *Training* *to improve the grant management programs*

Ensuring Grant Compliance

Grant compliance can be complicated, but it is a critically important to the achievement of the goals of many organizations. Understanding the steps necessary to meet grant requirements is the first step to avoiding common pitfalls and achieving compliance.

► Use the **appropriate guidance** to understand and communicate grant requirements throughout your organization

► **Work with the granting agency** often to ensure compliance with requirements and meeting expectations

► Avoid common pitfalls by establishing **effective internal controls** for grant management and compliance

► Leverage **internal audit** to assist in managing compliance and during grant monitoring reviews

Questions?