# OMB Super Circular: Are You Ready?

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## Checkmark graphic How to Prepare for 2015 and Beyond

Effective Dec. 26, 2014 (not retroactive)

Review the actual OMB Super Circular here: <http://1.usa.gov/1qGuFvQ>

Review the FAQs here: <http://1.usa.gov/1qjegTT>

Know cost principles, aka allowable costs (Subpart E, 200.400-475)

Ensure costs are: **Reasonable**, **Allocable**, and **Allowable**

**Should** seek prior written approval from federal awarding agency (200.407)

Performance over compliance: **Must** relate financial data to performance (200.301)

Review & update existing organizational policies

* Travel (200.474, new family friendly policies)
* Conflict of Interest/Gift/Mandatory Disclosure policies (200.112-113, 200.319)
* **Must** have written procurement procedures (200.317-326)
* Social Media, Advertising & Public Relations policy (200.421, new)

Time & Effort reports must now account for 100% grant, non-grant activities (200.430)

Add certification statement to agreements, reimbursement reports (200.415)

Consider having an attorney review policies for personal and organizational liability

**Must** protect personally identifiable/sensitive info (200.303); check with Tech Dept.

**Should** follow Green Book “Standards for Internal Control in the Fed. Govt.” (200.303)

**Must** submit final grant reports within 90 days of funding end date (200.343-345)

Ensure you are risk worthy for future federal funds (200.205)

1. Financial stability
2. Performance history
3. Quality of management system
4. Audit reports
5. Applicant ability to implement program

## Dollar sign graphic Grant Management Tips

Grant writing is a full time job, and so is grant management

Keep the promises you wrote in the Project Design section of your grant

Breathe, eat, and dream the grant project (know the grant app as well as the grant writer does)

Give a copy of the project design narrative to project staff and familiarize them with the project purpose and implementation steps

Present overview of funded grant to Board (purpose, objectives, timeline, budget, copy of award letter)

Prepare action steps for team/partners based on grant project

Create a detailed audit trail (have a CPA perform an audit)

Discuss fiscal accountability with CFO (i.e. clear or single audit trail)

Know and use the strengths of your project team members

Use a calendar or system that works for you to keep up with required quarterly and closeout grant reports

Keep grant funds in a separate account (track by date, expenditure, and line-item allocation against the approved grant budget)

Ensure project staff follow task/activity timeline & create a corrective action plan in case objectives are not met before grant funding ends

Share evaluation process with project staff and partners (what is monitored, data collection/reporting, stakeholder roles)

If a third party evaluator is used, meet and strategize the methods for monitoring and evaluating grant objectives

Create closeout reports for all stakeholders, including partners and Board

When in doubt, read the OMB Super Circular itself plus the FAQs; call the FEDS responsible for the grant; consult an attorney, your business manager, or an accountant

Ensure all COI, Mandatory Disclosure, & procurement guidelines/policies are followed

Keep up with grant amendments—submit ASAP to FEDS & as soon as they are approved, make changes in your own grant management system

Make a list of allowable and unallowable costs for each grant file

Understand Direct & Indirect costs along with basic budget/accounting principles

Keep grant records for at least 3 years after grant project ends