



POST AWARD

A GUIDE TO REPORTING AND MANAGING YOUR NEW ANA GRANT



The pictures on the front cover are from ANA funded projects. Clockwise from the upper left:

Piegan Institute language project to increase the number of fluent, proficient Blackfeet speakers, and to build the capacity of Nizipuhwahsin immersion program staff to provide ongoing instruction using a Blackfeet language medium.

Partners in Development SEDS project to improve the math and science skills of pre-school age children living in Native Hawaiian communities falling below the poverty line through the creation of a culturally-sensitive, center-based curriculum titled "Ike No'eau," using computer based technology.

Knik Tribal Council Environmental project to establish a standard for tribal members to state their concerns about proposed development in a unified manner.

Fond du Lac Band of Lake Superior Chippewa Language project to plan and conduct three canoe-building sessions held entirely in the Ojibwe language.

Boozhoo. Aloha. Bezon. Ta na á née see. Qāgaasakung. Dagot'ee. Nayaafabaa. Mique wush. Khahowya. O-si-yo.[°]

Welcome to the Administration for Native Americans (ANA) post award training. The goal of this training is to help you understand the federal requirements related to tracking and reporting your new ANA project. During this training, you will learn:

Administration

- The roles and responsibilities of ANA, the Office of Grants Management (OGM), and the Division of Payment Management (DPM)
- How to read your Notice of Grant Award documents
- How to complete and submit the required quarterly reports (Objective Progress Report and SF425)
- How to use grantsolutions.gov
- How to submit a timely non-competing grant continuation application
- How to submit requests for non-routine grant actions
- Techniques to enhance participation of youth and elders in project activities
- How to build and document community support

Throughout this manual “tribes” refers to federally recognized and non-federally recognized tribes, while “organizations” denotes native non-profit organizations. Native Americans, as used in this manual, include American Indians, Alaska Natives, Native Hawaiians, Native Samoans, and the Native peoples of Guam and the Northern Mariana Islands.

Good luck on your ANA project and if you have any questions, do not hesitate to contact your regional training and technical assistance center and your ANA program specialist.

YawΔkó. Miigwech. Gunalchéesh. Fa'afetai. Nia:wen[†]

[°] Greetings in Ojibwe, Hawaiian, Shawnee, Plains Apache, Aleut, White Mountain Apache, Inupiaq, Ute, Chinook, Cherokee

[†]Thank you in Oneida, Anishinaabemowin, Tlingit, Samoan, Mohawk

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Abbreviations and Acronyms

<u>Term</u>	<u>Definition</u>
ACF	Administration for Children and Families
ANA	The Administration for Native Americans
CFDA	Catalog of Federal Domestic Assistance
CFR	Code of Federal Regulations
COB	Carry Over Budget
DPM	Division of Payment Management
DPO	ANA Division of Program Operations
DPPE	ANA Division of Policy, Planning, and Evaluation
DUNS	Data Universal Numbering System
NGA	Notice of Grant Award
FOA	Federal Opportunity Announcement
GPS	Grants Policy Statement
HHS	Department of Health and Human Services
NAPA	Native American Programs Act of 1974, as amended
NCC	Non-competing continuation
NCE	No Cost Extension
NFS	Non-Federal Share
NOA	Notice of Award Letter
OER	Objective Evaluation Report
OGM	ACF Office of Grants Management
OMB	Office of Management and Budget
OPR	Objective Progress Report
OWP	Objective Work Plan
PIP	Project Improvement Plan
SEDS	Social and Economic Development Strategies
SF	Standard Form
T/TA	Training and Technical Assistance

ANA Definitions

Authorized Organizational Representative: The individual, named by the applicant/recipient organization, who is authorized to act for the applicant/recipient and to assume the obligations imposed by the federal laws, regulations, requirements and conditions that apply to grant applications or awards.

Budget Period: The interval of time (usually 12 months) into which a project period is divided for budgetary and funding purposes. Funding of individual budget periods sometimes is referred to as “incremental funding.” The budget period also is the “period of funding availability” as specified in 45 CFR Part 74 and Part 92.

Construction: Construction of a new building, including the installation of fixed equipment, but excluding the purchase of land and ancillary improvements, for example, parking lots or roads.

Contingency Plan: A set of specific actions to reduce anticipated negative impacts on a project in the event challenges arise.

Core Administration: Salaries and other expenses for those functions that support the applicant's organization as a whole or for purposes unrelated to the actual management or implementation of the ANA-funded project.

Federal Share: Financial assistance provided by ANA in the amount of 80 percent of the approved costs of the project. The Commissioner may approve assistance in excess of such percentage if such action is in furtherance of the purposes of the Native American Programs Act of 1974 (NAPA), 42 U.S.C. 2991b.

Governing Body: A body: (1) consisting of duly elected or designated representatives, (2) appointed by duly elected official, or (3) selected in accordance with traditional tribal means. The body must have authority to enter into contracts, agreements, and grants on behalf of the organization or individuals who elected, designated, appointed, or selected them.

Equipment: An article of nonexpendable, tangible personal property, having a useful life of more than one year and an acquisition cost that equals or exceeds the lesser of: (a) the capitalization level established by the organization for the financial statement purposes, or (b) \$5,000.

Impact Indicators: Measurement descriptions used to verify the impact or the achievement of the project goal. Indicators must be quantifiable and documented. Impact indicators include target numbers and tracking systems. ANA requires one impact indicator per project. Impact indicators are separate from the results and benefits section of the OWP.

In-kind: The value of non-cash contributions directly benefiting a grant-supported project or program and that are provided by non-Federal third parties without charge to the recipient, the subrecipient, or a cost-type contractor under a grant or subaward. In-kind contributions may be in the form of real property, equipment, supplies or other expendable

property, or goods and services directly benefiting and specifically identifiable to the project or program.

Leveraged Resources: Any resource not including the Federal share, non-Federal contribution, and program income, expressed as a dollar figure, acquired or utilized during the project period that supports the project. Leveraged resources may include natural, financial, personnel, and physical resources provided to assist in the successful completion of the project.

Objective: A statement of the specific outcomes or results to be achieved within the project period which directly contribute to the achievement of the project goal(s) and support the community's long-range goals.

Objective Work Plan (OWP): The plan for achieving the project objectives and producing the results and benefits expected for each objective. The OWP is the blueprint for the project and includes the project goal, objectives, and activities. The form can be found at: <https://www.acf.hhs.gov/programs/ana/resource/objective-work-plan>

Partnerships: A collaborative effort between two or more parties that will support the development and implementation of the project.

Problem Statement: A clear and concise description of the condition or issue that will be addressed by the project.

Project Goal: The specific result or purpose expected from the project and achieved through the project objectives and activities.

Project Period: The total time for which federal support has been programmatically approved as shown in the Notice of Award; however, it does not constitute a commitment by the federal government to fund the entire period.

Real Property: Land, including land improvements, structures, and appurtenances thereto, excluding movable machinery and equipment.

Renovation or Alteration: Work that changes the interior arrangements or other physical characteristics of an existing facility or installed equipment so that it may be more effectively used for its current designated purpose or adapted to an alternative use to meet a programmatic requirement. A minor renovation or alteration is distinguished from construction and major renovations; it must not exceed the lesser of \$150,000 or 25 percent of total direct costs approved for the entire project period and must be essential for the project.

Section 1: About ANA

History of the Administration for Native Americans (ANA)

Housed under the Administration for Children and Families (ACF) within the Department of Health and Human Services (HHS), ANA has its roots in a collection of ideals that were officially brought together in January 1964 when President Lyndon B. Johnson declared “War on Poverty.” In his call to action, President Johnson asked communities to prepare “long-range plans for the attack on poverty.” Eight months later, the Economic Opportunity Act was signed into law, and shortly thereafter the Office of Economic Opportunity (OEO) began awarding grants. Early in the 1970s, the OEO was terminated. However, in 1974, many of its “War on Poverty” concepts became the foundation for ANA. ANA was established in 1974 through the Native American Programs Act (NAPA). This new agency embraced the goal of Indian self-determination, which was endorsed by President Johnson in 1968 and later by President Nixon.

Today, ANA works to achieve its mission and goals and serves all Native Americans, including 566 federally recognized tribes, American Indian and Alaska Native organizations, Native Hawaiian organizations and native populations throughout the Pacific basin (including American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands).

Mission of ANA

ANA promotes the goal of self-sufficiency for Native Americans by providing funding through competitive discretionary grants for community based projects and for training and technical assistance to eligible tribes and native organizations. Those tribes and organizations represent nearly 4.3 million individuals.

ANA Goals

The major goals of ANA are to:

1. Foster the development of stable, diversified local economies and economic activities that will provide jobs, promote economic well-being, and reduce dependency on public funds and social services;
2. Support local access to, control of, and coordination of services and programs that safeguard the health and well-being of people and are essential to a thriving and self-sufficient community.
3. Increase the number of projects involving youth and intergenerational activities in Native American communities.

Philosophy of ANA

ANA's philosophy of native self-sufficiency is based on the following core beliefs:

1. ANA believes a native community is self-sufficient when it can generate and control the resources necessary to meet its social and economic goals, and the needs of its members.
2. ANA believes the responsibility for achieving self-sufficiency resides with the native governing bodies and local leadership.
3. ANA believes progress toward self-sufficiency is based on efforts to plan and direct resources in a comprehensive manner consistent with long-range goals.

Roles and Responsibilities

The grantee, ANA, the ACF Office of Grants Management, and the Division of Payment Management have specific roles and responsibilities in the implementation and management of an ANA grant.

You (The Grantee)

The grant is an agreement between the awarded tribe or organization and the federal government. You are responsible for implementing the approved project on time and within budget. The grantee must comply with all federal regulations, including requesting approval for changes as outlined in this manual and the HHS Grants Policy Statement (available at <http://dhhs.gov/asfr/ogapa/grantinformation/hhsgps107.pdf>) and by submitting correct quarterly reports on time.

ANA

ANA Commissioner

The ANA Commissioner, appointed by the President of the United States and confirmed by the United States Senate, provides executive leadership for ANA. The Commissioner makes award decisions, implements special initiatives, and provides overall policy guidance to ANA.

In addition, the Commissioner is the Chair of the Intra-Departmental Council on Native American Affairs (IDCNAA). The council is composed of senior leadership from major agencies within HHS and is the departmental focal point for all initiatives affecting Native American people. Under its charter, the IDCNAA coordinates and encourages the cooperation of the department's and other federal agencies' resources for Native American people. IDCNAA also develops and implements a meaningful policy on Native American affairs for the entire department and ensures that this policy will be applied consistently throughout the department and, where possible, throughout the federal government.

Program Specialist

The primary purpose of a program specialist is to help you accomplish your project on time, within budget, and within compliance of federal regulations. Each program specialist in the

ANA Division of Program Operations has a portfolio of grants and is responsible for monitoring the programmatic activities and the financial elements that may impact the grant's programmatic activities. Some examples of when grantees should contact their program specialist are:

- To discuss making programmatic changes to a project such as personnel changes, budget modifications, carry over budgets, and no-cost extensions;
- To request technical assistance;
- With questions on ANA policies;
- With questions about the quarterly objective progress reports (OPRs) and other reporting requirements; and
- With questions regarding how to track and monitor the project's progress.

Training and Technical Assistance Providers (TA Providers)

ANA provides free training and technical assistance to potential applicants and current grantees through contractors in each ANA geographic region. The four ANA geographic regions are East, West, Alaska, and Pacific. TA providers are experts in project management and development. They are knowledgeable of ANA policies and programs as well as other funding opportunities and partnerships. They can provide guidance electronically or at a grantee's site. TA providers conduct:

- One-on-one assistance to grantees in the administration and implementation of an ANA funded project;
- One-on-one assistance in preparing and submitting a grant application;
- Training in project development, pre-application, and post award; and
- ANA impact visits.

Impact Evaluators

NAPA, the authorizing legislation for ANA, calls for ANA to assess the impact of ANA funding in native communities. To meet this mandate, impact evaluators in the ANA Division of Policy, Planning and Evaluation conduct impact visits. The purpose of the visit is to determine the overall impact and success of the project. The visit is a chance for grantees to share the benefits, best practices, and general challenges met during the life of the project. Specifically, the impact evaluators:

- Assess the impact of ANA funding on native communities;
- Increase ANA's knowledge about the grantees' successes and challenges and analyze data from the visits to improve ANA service delivery; and
- Increase transparency and collaboration by sharing the unique stories of ANA grantees with fellow native communities, Congress, and the American public.

Office of Grants Management (OGM)

OGM is an office within ACF and is responsible for awarding grants and monitoring the fiscal aspects of those grants. OGM provides guidance on the federal terms and conditions of award, issues the Financial Assistance Award (NGA), approves all grant actions, assists in the setting up of financial accounts to receive federal grant awards, and maintains the official grant file with the original copies of the applications, reports, and close-out information.

Grants Management Specialist

The grants management specialist is responsible for overseeing and approving the financial management activities of the grant. Grants management specialists review the financial reports and work with the ANA program specialist on monitoring the ANA grant. Some examples of when grantees should contact their grants management specialist are:

- To discuss making budget modifications to a grant, such as a revision of the indirect cost rate or a carry over budget;
- With questions regarding program income generation;
- With questions about the quarterly financial report, the SF-425; and
- With questions regarding the terms and conditions of award.

Division of Payment Management (DPM)

DPM is part of the Program Support Center for HHS and is responsible for all payment related activities from the time of award through the closeout of the ANA grant. DPM makes payments to grantees, manages cash flow, reports disbursement data to ANA and OGM, and coordinates the debt collection. DPM processes requests for payment and reviews the quarterly SF 425 report to ensure the grantee does not have excess cash on hand.

Section 2: Planning and Organizing

The Project Cycle

A project is different from a grant. The project is the goal, objectives, and activities a community works on to meet a defined set of results and benefits. The grant is the contract between the grantee and the funding organization to fund the project. In other words, the project is the idea and the grant is the funding which makes that idea a reality. The process of planning and managing projects follows a logical, continuous cycle where each phase of the project leads to the next. Grantees in the post award training have completed the two steps of the project cycle, identify and design, and are now in the project implementation stage. Since project development is a continuous cycle, the implementation of one project may allow grantees to identify and design future project ideas.

Project monitoring occurs throughout all stages, allowing for small adjustments in the project’s planning, design, and implementation in order to ensure the project’s success. There are certain monitoring activities the grantee must engage in to meet the funding requirements of the ANA grant, including submitting reports, documenting the match obligation, and tracking leveraged resources, partnerships, project specific impact indicators, and community support.

The Grant Year

During the course of the project period, grantees will engage in project and administrative activities, including start-up activities, on-going activities, and close-out. Below is an outline of activities that are common to most projects.

Grant Year for Language Preservation & Maintenance and Esther Martinez Initiative Grants

Table 1: Award Document

Activity	When?
Receive & review award document	End of July - August

Table 2: Quarter One, August 1 to September 30

Activity	When?
Hire project staff, if necessary	First two months, or according to OWP
Orient staff on revised project documents	As staff are brought onto project
Establish grantsolutions.gov account	August
Establish DPM account	August
Start up grant activities	August
Attend post award training if in first year	September

Table 3: Quarter Two, October 1 to December 31

Activity	When?
Submit 1 st quarter reports no later than October 30 th	October

Table 4: Quarter Three, January 1 to March 31

Activity	When?
Submit 2 nd quarter reports (OPR & FFR) no later than January 30	January
Watch for NCC application notification from ANA if a multi-year grantee	February, approximately

Table 5: Quarter Four, April 1 to July 31

Activity	When?
Submit 3 rd quarter reports no later than April 1 st	April
Submit continuation application if a multi-year grantee	June
Possibly participate in an ANA impact visit if in final year	July through December
If in final year, complete grant activities and obligate all funds no later than July 31st	July
Submit 4 th quarter reports no later than Oct 31st	October
If in final year, submit final reports no later than 90 days after end of project period	November

Table 6: Throughout Project Period, August 1 to July 31

Activity	When?
Draw down funds from DPM	Throughout project period
Continue grant activities	Throughout project period
Monitor expenses versus budget	Throughout project period

Grant Year for Social & Economic Strategic, Environmental Regulatory & Special Initiative Grants

Table 7: Award Document

Activity	When?
Receive & review award document	End of September

Table 8: Quarter One, September 30 to December 31

Activity	When?
Hire project staff, if necessary	First two months, or according to OWP
Orient staff on revised project documents	As staff are brought onto project

Activity	When?
Establish grantsolutions.gov account	October
Establish DPM account	October
Start up grant activities	October
Attend post award training if in first year	December to January

Table 9: Quarter Two, January 1 to March 31

Quarter Two	January 1 to March 31
Submit 1 st quarter reports no later than January 10 th	January
Watch for NCC application notification from ANA if a multi-year grantee.	February, approximately

Table 10: Quarter Three, April 1 to June 30

Quarter Three	April 1 to June 30
Submit 2 nd quarter reports no later than April 30 th	April
Submit continuation application if a multi-year grantee	June

Table 11: Quarter Four, July 1 to September 29

Quarter Four	July 1 to September 29
Submit 3 rd quarter reports no later than July 30 th	July
Possibly participate in an ANA impact visit if in final year	July through December
If in final year, complete grant activities and obligate all funds no later than September 29th	September
Submit 4 th quarter reports no later than Oct 31st	October
If in final year, submit final reports no later than 90 days after end of project period	December

Table 12: Throughout Project Period, September 30th to September 29th

Throughout project period	September 30 – September 29
Draw down funds from DPM	Throughout project period
Continue grant activities	Throughout project period
Monitor expenses versus budget	Throughout project period

Start Up Grant Activities

1. **Review Grant Award Documents and Begin Creating the Grant File.** Prior to starting the project, the project staff should review the NGA, the application and revisions, and the OWP and ensure this information is in the grant file.

2. **Set up your grantsolutions.gov account.** All grantees must have a grantsolutions.gov account in order to report, submit continuations, and request grant amendments.
3. **Establish Payment System.** Most grantees currently receive federal funds through DPM. If new to the federal grant process, the grantee will have to contact DPM to determine the method for payment and complete the appropriate forms. DPM may be contacted through their website at <http://www.dpm.psc.gov>
4. **Hiring of Staff.** Work with the human resource department to initiate the hiring process in accordance with the approved OWP and the procedures of the grantee's tribe or organization.

Note: Data from ANA impact visits show that staff hiring is the single most important factor in the timely implementation of a new project. A review of projects that had difficulty in hiring project staff indicated that most of the projects that were unable to fill positions were unsuccessful in achieving the project goals. Late hiring and/or turnover can substantially slow down a project and prevent it from being successful.

5. **Orientation of New ANA Project Staff.** It is important to orient the new staff to the goals, objectives, and activities in the approved ANA application (including any revisions). The new staff will need to be familiar with the roles and responsibilities of the ANA program specialist and the OGM grants management specialist. In addition, the staff should be provided an orientation of the ANA project budget, the required match, the procedures for documentation of the match, and the required reports and the reporting schedule. A letter showing the staff was oriented to the project should be included in the grant file.
6. **Post Award Grantee Training.** The designated staff, typically the financial officer and the ANA project director, attends the post award grantee training.

Ongoing Grant Activities

1. **Program Activities.** Performing the activities detailed in the approved OWP and monitor the process towards achieving the expected results, benefits, and impact.
2. **Financial Management.** Accounting for grant funds in accordance with the federal requirements and adhering to federal financial management regulations; this includes regular meetings between program staff and finance staff to review expenditures against the approved budget.
3. **Cash Management.** Requesting and receiving federal funds from DPM.
4. **Securing Matching Funds.** Securing and documenting the matching share of the grant.
5. **Reporting.** Make sure you submit the required reports (OPR and SF-425). More information on this is in Section 3: Reporting.

6. **Implementing Planned Activities For Sustainability.** ANA's mission is to promote self-sufficiency in native communities. ANA does not fund on-going projects, so grantees are encouraged to determine and establish methods of sustainability to help ensure the project results, benefits, and impact continue past ANA funding.

Close Out Activities

1. Submit Close-out Reports. This includes the:
 - ANA Objective Evaluation Report (OER), a cumulative OPR of the entire project period.
 - Final SF-425
2. Participate in ANA Impact Visit. The majority of the ANA grants receive an impact evaluation visit. Review the impact visit outline in section 6 of this manual and prepare data and reports accordingly.

What is in the Grant File?

ANA recommends grantees' maintain two grant files, the official grant file and the program grant file. The official grant file is generally maintained by the finance or tribal administrator office throughout the life of the project and for the required retention period. The official grant file is what is reviewed by auditors. The program grant file is created and maintained by the program staff and is designed to be a tool to assist in the successful monitoring and implementation of the project. Often, the official and program grant file contain the same information and there should be periodic comparisons of the two files, but the program file is designed to be a reference for the program staff and should be housed within the program office.

The information below is ANA's recommendation of what the program grant file should contain.

1) Notice of Grant Award Documents

- Current Notice of Award (NOA)
- Previous NOAs (if applicable)

The NOA is official government correspondence to the tribe or organization. The NOA is sent to the authorizing official and announces the award of funding for the proposed project. The NOA provides key reference information to the grantee:

- Contact information for the ANA program specialist and the OGM grants management specialist assigned to work with the grantee. Contact information includes the names, addresses, telephone numbers, email addresses, and fax numbers of the specialists;
- Terms and conditions for award; and
- Information on setting up a DPM account.

The NGA document is the official award document establishing the agreement between the grantee and the government and is used by HHS for discretionary financial assistance programs such as ANA. The NGA states the federal award, match obligation, and approved budget category amounts. No costs can be incurred prior to start of the project period and the receipt of the NGA unless prior approval has been granted by ACF/ANA. The purpose of the NGA document is to:

- Notify the grantee and others of the ANA grant award;
- Incorporate by reference all terms and conditions of the award; and
- Record the obligation of ANA funds.

When does a grantee receive an NGA?

- An NGA is prepared and sent to the grantee with the NOA to signify the grant award has been made;

- A grantee will receive a new NGA when OGM issues approval for a change to the grant that requires prior approval, such as a key personnel change, budget modification, carry over budget, or no cost extension; and
- When a non-competing continuation is approved for multi-year grants.

The NGA includes key reference information for the grantee, including:

- Box 3: Award number. The award number is the grant number the grantee should reference in all correspondence with ANA and include on the program and financial reports.
- Box 8: Budget Period. The budget period is the timeframe expenses can be incurred for grant activities. ANA's budget period is 12 months.
- Box 9: Project Period. The project period is the timeframe grant activities can be performed.
- Box 15: Principal Investigator or Program Director. The individual designated to be the contact person to ANA on issues relating to the grant.
- Box 16: Approved Budget. The federal and non-federal dollar amounts for the object categories approved for the grant.
- Box 17: Award Computation. The dollar amount for the non-federal share provided by the grantee and the federal dollar amounts provided by ANA for the grant expressed as a percentage. The grantee must ensure it meets the non-federal share requirement as cited on line 17A. This amount must be contributed even if it exceeds the minimal amount required by law, regulation, or other ACF provision. Failure to provide this amount of non-federal share will result in a proportionate reduction of the federal share or other disallowance action.
- Box 21: Authorized Treatment of Program Income. This authorizes the use of program income generated as a result of grant activities.
- Box 26: Remarks. States how the grant is paid, regulations incorporated by reference, and other requirements of the grant. Examples of remarks include a link to the HHS grants policy statement and a statement that initial expenditure of funds by the grantee constitutes acceptance of the award. The grant is paid through the HHS centralized Payment Management System by DPM.

2) Project Documents

- Approved OWP
- Approved impact indicator
- Current 424a and budget
- Revised project application if applicable (for year 2 and 3, the revised continuation applications)
- Original project application (for year 2 and 3, the original continuation applications)

- Staff orientation letters

The approved OWP serves as a blueprint for project implementation and is an essential reference for reporting requirements. Progress on the project is reported quarterly in the OPR. The approved impact indicator(s) are used to gauge progress in meeting the project goal, recruiting partnerships, and leveraging resources. The current 424a and budget must match the current NGA. The revised project application and revised continuation application include the information submitted during negotiations with ANA and OGM. The original project application and continuation applications are what was initially submitted to ANA for funding consideration.

Staff orientation letters are a grantee's internal management tool to track project staff orientation to the project, the grant, and the post award manual. Grantees do not need to submit these letters to ANA.

3) Reporting

- Objective Progress Reports (OPRs)
- SF 425s
- Year 2 and 3 reports if applicable

Grantees must submit quarterly reports to ANA. Detailed information can be found in Section 3 of this manual.

4) Community Involvement Documentation

- Meeting sign-in sheets and meeting minutes
- Publicity/marketing materials
- Testimonials
- Other

ANA seeks to fund community development projects that reflect the cultural values, collective vision, and long-range development goals of native communities. ANA supports this approach because community involvement in the project planning and project implementation phases is a key factor in achieving success. In addition, many funding agencies look favorably on applications that document community involvement in the planning and implementation of a project. Tracking community involvement through detailed sign-in sheets, minutes of meetings, testimonials, or publicity such as news articles are good tools to demonstrate to funding organizations and the public the extent of community involvement in the project.

5) Project Data Tracking

- Non-federal share documentation
- Leveraged resources tracking
- Partnership tracking
- Project specific impact indicator tracking

- Photos
- Other tracking documents developed by the grantee

Grantees should collect quantitative data (e.g., the number of partnerships formed, the dollar amount of resources leveraged, etc.) as well as qualitative data (e.g., collecting the anecdotes and viewpoints that tell the story of the project) during the course of the project period. ANA asks for this data through quarterly OPRs and during impact visits. Templates for tracking this information can be found in the “Preparing for the Impact Visit” section of this manual.

6) Correspondence between Grantee and ANA

Official and unofficial correspondence between the grantee and ANA (such as the ANA program specialist monthly emails) should be included in the grant file for reference. ANA recommends the correspondence be organized as follows: official correspondence under one tab; a phone log broken down by quarter under another tab; and emails and letters broken down by importance, including any requests for grant actions under the third tab.

Activity: Tracking Indicators

Using the case study, list the impact indicator

1.

A. Describe the methods you would use to track each of the indicators.

Indicator 1: Partnerships

Indicator 2: Leveraged Resources

Indicator 3: Project specific

B. Describe who will be collecting the data and how often the data will be collected.

Indicator 1: Partnerships

Indicator 2: Leveraged Resources

Indicator 3: Project Specific

Section 3: Reporting

Upon receipt and acceptance of a grant award from ANA, the grantee is responsible for submitting reports to three separate divisions within HHS. The required reports are the Objective Progress Report (OPR), the Financial Status Report (SF-425) and the Cash Management Reports (SF-425). The chart below illustrates the entities that receive the reports and indicates the reports they receive.

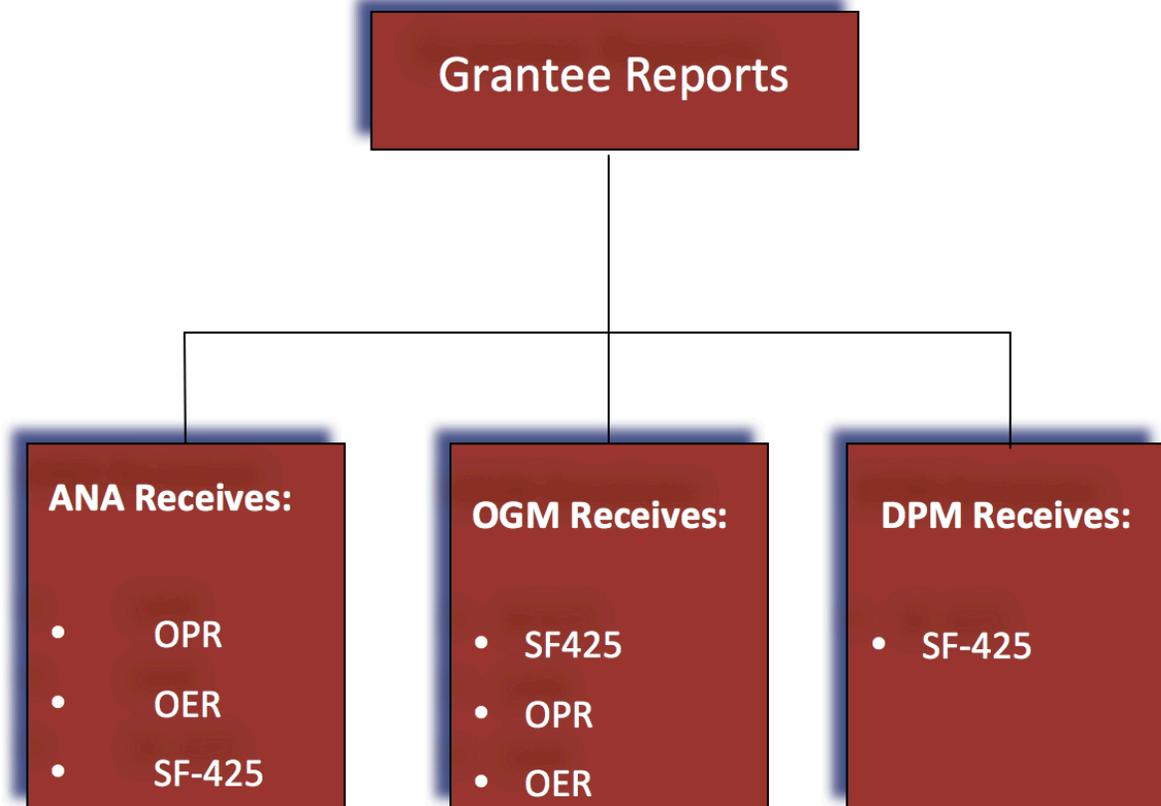


Figure 1: Grantee Reports Workflow

Objective Progress Reports (OPR)

ANA's goal is for all grantees to get the needed support to fully implement their funded projects. ANA program specialists and TA providers closely review the quarterly OPRs to monitor progress, provide technical assistance when necessary, and better understand the ANA funded projects.

When ANA reviews the quarterly reports, the program specialists and TA providers check:

- Is the OPR filled out completely and correctly?
- Does the OPR match the OWP?
- Does the OPR financial section match the SF-425 and 424a Section D?
- Is project staff hired?
- Are activities being accomplished according to the approved timeline?
- Are challenges being encountered and addressed by the grantee?
- Is the grantee requesting technical assistance?
- Are there any programmatic or budget modifications proposed or implemented?
- Are DPM draw downs occurring?
- Are all impact indicators listed and tracked?

The OPR and SF-425 are due thirty days from the end of the quarter. Timely reporting is a requirement of the grant. Grantees are encouraged to submit reports as early as possible after the end of the quarter to avoid any last minute circumstances that might result in delinquent reports. Late reporting may result in steps that may include restricting funds, requiring monthly reports, or relinquishing the award. Grant actions will not be approved if any reports are delinquent.

Report Due Dates are below:

Table 13: Language Preservation & Maintenance and Esther Martinez Initiative Report Due Dates

	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	Year-End Financial Report
Progress Report Period End Date	September 30	December 31	March 31	July 31	
OPR Due Date	October 30	January 30	April 30	August 30	
Financial Report Period End Date	September 30	December 31	March 31	June 30	July 31
SF-425 Date	October 30	January 30	April 30	July 30	October 30

Table 14: SEDS, Environmental and Special Initiatives Report Due Dates

	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	Year-End Financial Report
Progress Report Period End Date	December 31	March 31	June 30	September 29	
OPR Due Date	January 30	April 30	July 30	October 30	
Financial Report Period End Date	December 31	March 31	June 30	September 29	September 29
SF-425 Date	January 30	April 30	July 30	October 30	October 30

On the following pages, we include blank versions of the OPR as well as the SF-425. These reports are your official reporting to ANA on the progress of your project as well as the spending. We also have a few activities to help you understand how the reports are reviewed.

Administration for Native Americans—Objective Progress Report (OPR)

The Paperwork Reduction Act of 1995: Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number.

		Page:	Of	Pages
1. Grantee Name		2. Grant Number		3a. DUNS Number
				3b. EIN
4. Recipient Organization (Name and complete address including zip code)				5. SF425 Long Form Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No
6. Project Period			7. Reporting Period End Date	
Budget Period Year Covered in the Report: Year 1	Start Date: (Month, Day, Year)	End Date: (Month, Day, Year)	(Month, Day, Year)	
			8. Quarter <input type="checkbox"/> Q1 <input type="checkbox"/> Q3 <input type="checkbox"/> Q2 <input type="checkbox"/> Q4 <input type="checkbox"/> Final (OER) <input type="checkbox"/> other (revisions, etc.) (If other, describe:)	
9. Performance Narrative (attach performance narrative as instructed by the awarding Federal Agency)				
Project Title:				
Report prepared by: Name: Date:				
Email Address: Telephone (area code, number and extension):				
10. Other Attachments:				
11. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.				
12a. Typed or Printed Name and Title of Authorized Certifying Official			12c. Telephone (area code, number and extension)	
			12d. Email Address	
12b. Signature of Authorized Certifying Official			12e. Date Report Submitted (Month, Day, Year)	
13. Agency use only				

Objective Work Plan Update

1. Have any changes been made to the Objective Work Plan (OWP)?

Yes No

If Yes, please explain.

If Yes, did you **request** approval for these changes from your Awarding Agency?

Yes No

Comments/Date requested:

If Yes, did you **receive** approval for these changes from your Awarding Agency?

Yes No

Comments/Date approved:

2. Please complete the tables below and include all objectives, results, benefits, activities and dates **as they appear in** your approved OWP. If you require more space, please add additional tables as necessary.

Please use these instructions when completing the table below:

Status of Activity: Please choose the status of the activity from the drop-down box below utilizing the following definitions:

- Completed (check this box if activity is complete)
- Ongoing (check this box only if activity is supposed to continue past this quarter according to the OWP)
- N/A this quarter (check this box if activity is scheduled to start after this current quarter)
- Delayed (check this box if activity is not completed by the originally anticipated end date and is still active)

GOAL:

Year:

Objective 1:

Activities	Describe how each activity was accomplished (or what prevented the activity from being completed). Include quantitative information (e.g. # of participants, workshops, etc).	Begin Date	End Date	Status of Activity (see instructions above)
	Q1: Q2: Q3: Q4:			If activity is delayed beyond originally anticipated end date (from OWP), include expected completion date: mm/dd/yr

Current Status of Expected Results:

Current Status of Expected Benefits:

Objective 2:

Activities	Describe how each activity was accomplished (or what prevented the activity from being completed). Include quantitative information (e.g. # of participants, workshops, etc).	Begin Date	End Date	Status of Activity (see instructions above)
	Q1: Q2: Q3: Q4:			If activity is delayed beyond originally anticipated end date (from OWP), include expected completion date: mm/dd/yr

Current Status of Expected Results:

Current Status of Expected Benefits:

Objective 3:

Activities	Describe how each activity was accomplished (or what prevented the activity from being completed). Include quantitative information (e.g. # of participants, workshops, etc).	Begin Date	End Date	Status of Activity (see instructions above)
	Q1: Q2: Q3: Q4:			If activity is delayed beyond originally anticipated end date (from OWP), include expected completion date: mm/dd/yr

Current Status of Expected Results:

Current Status of Expected Benefits:

PARTNERSHIPS AND LEVERAGED RESOURCES

3. PARTNERSHIPS - In the first table, identify the targeted number of partnerships from your application, the total number of new partnerships formed during the reporting period (quarter), and the cumulative number of partnerships formed since the project began. In the second table, provide details which support the data in the first table. Identify each partner during the quarter that the partnership was formed or utilized. Do not identify the same partner more than once.

Indicator	Target from application	Quarterly Totals for budget period	Cumulative total since beginning of project
Partnerships Formed	#	Q1 Q2 Q3 Q4	#

Partnering agency/organization/tribe	Brief description of partnership and how it is benefiting the project	Year formed	Quarter formed
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

Comments:

4. LEVERAGED RESOURCES - First, identify the targeted dollar amount from the application. In the table, identify the sources of all leveraged resources, whether each is a Federal (F) or non Federal (NF) source, and the dollar value of each resource by quarter as it contributes to the project.

Approved Target:

F	NF	Source	Y1, Q1	Y1, Q2	Y1, Q3	Y1, Q4	Y2, Q1	Y2, Q2	Y2, Q3	Y2, Q4	Y3, Q1	Y3, Q2	Y3, Q3	Y3, Q4	Y4, Q1	Y4, Q2	Y4, Q3	Y4, Q4	Y5, Q1	Y5, Q2	Y5, Q3	Y5, Q4	Total	
		Quarterly Totals:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		

Totals	
Y1 Total	
Y2 Total	
Y3 Total	
Y4 Total	
Y5 Total	
Cumulative Total:	0.00

IMPACT INDICATOR

The impact indicator measures what will change as the result of the project.

5. Identify the impact indicator, tracking mechanism, baseline measure (for comparison with end of grant and three year targets), and targets approved during award negotiations:

Identify the following:

Impact indicator:

Tracking mechanism:

Pre-grant status (Baseline measure):

End of grant target:

Three-year target:

You only need to report on questions 5a and 5b when you submit your 4th quarter report at the end of the budget period.

5a. Utilizing this indicator, to what extent are you able to assess quantitative or qualitative change in the baseline measure? Please identify the change that has occurred. (For example, if your impact indicator is the unemployment rate, list the actual unemployment rate at the end of the budget period.)

Year	Status
Year 1	
Year 2	
Year 3	
Year 4	
Year 5	

5b. On a scale of 1-5, to what extent was the stated impact indicator achieved at the end of the **budget period**?
1. Not Yet Achieved 2. Somewhat Achieved 3. Mostly Achieved 4. Fully Achieved 5.Exceeded

Comments (if you are tracking additional impact indicators please describe their status here):

Please note you are not required to track or report on additional impact indicators.

NATIVE AMERICAN YOUTH AND ELDER OPPORTUNITIES

6. During this reporting period, did this project provide any opportunities or activities for Native American youth or elders?
 Yes No NA

Please list all activities that occurred during this quarter (in which youth or elders were present):

Activity	# of youth participating	# of new youth participating (first time participants)	# of elders participating	# of new elders participating (first time participants)	Intergenerational activity
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No

Participant Detail	# of new youth participating (first time participants)	# of elders participating	# of new elders participating (first time participants)	Intergenerational activity
New participants:				
Unduplicated # of youth & elder participants, as of previous quarter (see previous OPR):				
Total unduplicated # of youth & elder participants, entire project (this quarter + previous):				

6a. During this reporting period, did the project result in any intergenerational activities between grandparents and their grandchildren?

Yes No

STAFFING

7. Have you hired all personnel, as outlined in the grant application?

Yes No

If No, please list any positions currently vacant, reasons for hiring delays and when you expect the position to be filled.

7a. Did you have any changes or turnover in project staff, consultants or contractors during this reporting period?

Yes No

If Yes, please list affected positions, explain the reason for the change, how long the position has been open, and if the position has been filled:

7b. Please list all jobs currently filled and required for this project.

Position Title	Name	Type of position (Project position, Consultant, Stipend, Intern, Other)	Year job was created	Quarter job was created	Hours per week	Funding Source (Federal, Non-Federal, Leveraged, Other)

CHALLENGES

8. Did your project have a late start?

Yes No (Please report on this question only in the 1st quarter)

If Yes, please elaborate on the cause(s) for the late start:

9. Did your project face any challenges during this reporting period (quarter)?

Yes No

If Yes, please describe your challenges in the table below:

Provide a description of the challenge	Did you overcome the challenge?	If Yes, please state how you overcame the challenge. If no, please identify your plan to address this challenge.
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	

10. Do you expect to complete your project objectives and activities by the project end date?

Yes No

If No, please explain:

11. The Awarding Agency is committed to assisting you in the successful implementation of your project and offers free training and technical assistance. Would training or technical assistance benefit the project at this time?

Yes No

If yes, please provide details:

PROJECT SUSTAINABILITY:

As all projects should either lead to sustainable programs or to sustainable impact, please respond to the questions below to identify efforts toward ensuring sustainability:

12. Please mark the following box that best describes your level of funding to sustain project benefits:

- Desired funding levels for sustainability in place
- Some funding already secured to sustain project
- Still seeking funding, none currently in place
- No funding secured, no plan yet in place through which to obtain funds
- No funding needed

Note: Fundraising utilizing Awarding Agency funds is not allowed during the project period.

13. What steps have you taken to ensure the benefits of the project will be sustained after the Awarding Agency funding ends?

FINANCIAL

14. Did you have trouble accessing funds through the Payment System during this reporting period?

- Yes No

If Yes, please explain the problem and if it was resolved:

15. Have any changes requiring prior approval (see post award manual for what requires prior approval) been made to your budget during this reporting period?

- Yes No

If Yes, did you request approval from the Awarding Agency?

- Yes No

Comments/Date requested:

If Yes, did you receive approval for these changes from the Awarding Agency?

- Yes No

Comments/Date approved:

16. What were your forecasted cash needs for this reporting period (from the Form 424A)? What were your actual expenditures (from the SF 425)? Please list in the table below:

	1 st Quarter Forecasted	1 st Quarter Actual	2 nd Quarter Forecasted	2 nd Quarter Actual	3 rd Quarter Forecasted	3 rd Quarter Actual	4 th Quarter Forecasted	4 th Quarter Actual
Federal	\$	\$	\$	\$	\$	\$	\$	\$
Non-Federal	\$	\$	\$	\$	\$	\$	\$	\$

16a. If forecasted and actual amounts for the quarter do not match, please explain why:

Q1:

Q2:

Q3:

Q4:

17. Do you anticipate obligating all of the Federal funds awarded for this budget period by the budget period's end?

Yes No

If No, please explain:

18. Did your project generate any program income (defined as a result of project activities)? Yes No

If so, from what source?

19. Please include any other information you would like to share with the Awarding Agency regarding your project:

Assets for Independence (AFI) Grants (These questions should only be answered by AFI grantees).

20. **“Non-Federal” Funding Deposited:** To date, how much “nonfederal” cash have you deposited into the Project Reserve Fund to match your AFI grant? (Remember, for every dollar of AFI grant funds, you must obtain an equal dollar of matching funds).

What is/are the source(s) of the matching funds you have secured? Please input this information in the table below.

Source	Amount	Date of Receipt of Funds	Number of IDAs Funding will Support	Asset Goals that this Funding will Support

21. Additional “Non-Federal” Funding

(a) If you have not yet secured matching funds in an amount equal to your AFI grant, what sources have you identified to obtain these funds?

Source	Amount	Date Receipt of Commitment Letter Expected	Date Receipt of Funds Expected	Number of IDAs Funding will Support	Asset Goals that Funding will Support

(b) For each of the funding sources identified above, please list activities planned to secure the funding (e.g. calls, meetings, etc).

Source	Date	Activity	Description	Tentative or Confirmed?

22. Alignment of Program and Financial Outcomes: Please provide a written explanation of how the narrative report aligns with the financial status report. For example, link expenditures to program outcomes by including information on the total number of participants who have received matched withdrawals as of the end of the reporting period, the amount they have received, and a summary of administrative costs incurred.

23. Significant Findings and Events: Use this portion of the report to highlight any practices, procedures or experiences identified that might be helpful as models for other grantees to improve overall AFI performance.

24. Dissemination Activities: Briefly describe project outreach and information dissemination carried out over the reporting period. List and include a copy of any newspaper, newsletter, and magazine articles, and other published materials. *(If dissemination activities have been discussed in the OPR update section, please reference that section here).*

25. Activities Planned for Next Reporting Period (Only answer this question if it is the fourth quarter of the year): Briefly describe the project plan going forward.

26. Other Activities: Do you have any additional comments you would like to share about your AFI IDA project or your comprehensive asset-building project?

What is needed to complete the OPR?

1. OWP, Impact Indicator(s), and Budget
2. Completed SF-425 and cash draw downs for the grant
3. Schedule of all activities completed during each quarter based on the OWP
4. SF 424A
5. Documentation of match, partnerships, and leveraged resources secured during the quarter
6. OPR form

OPR Instructions:

Detailed instructions on how to complete the OPR are below. Use these instructions when completing the activities below and when responding to the request for information contained in the OPR.

Page 1

Item 1: Enter legal name of the grantee

Item 2: Enter the grant number assigned by DHHS/ACF/ANA. This number is found in Item 3 on the NGA.

Item 3.a: Enter the grantee DUNS number (received from Dun and Bradstreet)

Item 3.b: Enter the Employer Identification Number (EIN) assigned by the IRS

Item 4: Enter grantee name and complete address, including zip code

Item 5: Select “yes” if the SF-425 is attached to the OPR. Select “no” if the SF-425 is not attached.

Item 6:

- Enter the *budget* period covered in the report (e.g. Year 1, Year 2 or Year 3)
- Enter the *project* start date (month, day, and year)
- Enter the *project* end date (month, day, and year)

Item 7: Enter the month, day, and year of the last day covered by the report (e.g. December 31, 20XX, March 31, 20XX, June 30, 20XX, or September 29, 20XX).

Item 8: Indicate the reporting quarter (e.g. 1st, 2nd, 3rd, or 4th quarter, or Final (OER) report). Select “other” if the report does not cover a three month period and provide information on the period covered by the report.

Item 9: Enter the title of the ANA project, the name of the individual that prepared the report, the date, his/her email address and phone number. Note that the performance narrative referenced here starts on page 2.

Item 10: If attachments are being included with the report , list each of the attachments.

Item 11: Self-explanatory.

Item 12.a: Enter the name and title of the authorized representative of the grantee.

Item 12.b: Enter the signature of the authorized representative certifying the report.

Item 12.c: Enter the telephone number including the area code and extension number of the authorized representative certifying the report.

Item 12.d: Enter the email address of the authorized representative certifying the report.

Item 12.e: Enter the month, day, and year the report is being submitted.

Item 13: Leave blank.

Performance Narrative

Item 1: Objective Work Plan Update

- Select “yes” if any changes have been made to the Objective Work Plan (OWP) and provide an explanation of the changes. Select “no” if no changes were made to the OWP.
- Next, select “yes” if you requested approval from your Awarding Agency for the changes made to the OWP and “no” if you did not.
- Next, select “yes” if you received approval from your Awarding Agency for the changes to the OWP and “no” if you did not.

Item 2: Objective Work Plan:

Enter the goal of the project and the current budget year.

List each objective for that budget year and all the activities for each objective, *exactly as they appear* in the approved OWP.

In the second column, describe how each activity was accomplished during each quarter (i.e., Q1, Q2, Q3, Q4) of the budget period. *Report on activities should be specific and include numbers and dates when possible. The report should demonstrate how much progress has been made on the activity. If the activity has been delayed, identify the causes and what, if any, steps are being taken to address the challenge.* The information on activities is cumulative for each project year and should be maintained for the duration of the budget year (i.e. do not delete information from previous quarters for the current budget period).

In the third and fourth columns, enter the originally anticipated “begin date” and “end date” from the approved OWP.

In the last column, identify the status of the activity. This column should be updated each quarter. From the pull-down menu, select the correct status:

- “Completed” if the activity was completed based on originally anticipated “end date”.

- “Ongoing” only if the activity is supposed to continue past this quarter according to the OWP.
- “N/A” if the activity is not scheduled to start until later in the project period.
- “Delayed” if the activity was not completed based on the originally anticipated end date and is still active. If the activity is delayed, enter the expected day, month, and year that the activity is expected to be completed.

Finally, list the results and benefits expected from the approved OWP. Describe the current status of those results and benefits, including quantitative tracking for each quarter.

Item 3: Partnerships:

- In the first table, identify the targeted number of partnerships from your application, the total number of *new* partnerships formed during the reporting period (quarter), and the cumulative number of partnerships formed since the project began.
- In the second table, provide detail which supports the data in the first table. Identify each partner during the quarter that partnership was formed. Do not identify the same partner more than once. In column one, enter the name of the agency, organization, or Tribe with which the grantee established a partnership to support the ANA project.
- In column two provide a brief description on how the partnership is benefiting the ANA project.
- In columns three and four, enter the year and quarter in which the partnership was formed utilizing the drop-down list. This information is cumulative and should be maintained from the beginning of the grant to the last day of the project period.

Item 4: Leveraged Resources:

A leveraged resource is any cash or in kind goods/services received by the grantee to support the project; that are over and above the non-federal share match obligation. First, identify the target from the application. For each leveraged resource, identify:

- whether each is a Federal (F) or Non-Federal (NF) source (columns 1 and 2),
- the source (e.g. Bob’s Diner – catering for monthly meeting) of each leveraged resource (column 3), and
- the dollar value of each resource under the correct Year and quarter column.

All totals at the bottom and to the right of the table should be calculated. This information is cumulative and should be maintained from the beginning of the grant to the last day of the project period.

Item 5: Impact Indicator:

Identify the impact indicator, tracking mechanism, pre-grant status (for comparison with end of year and three year targets), end of grant target, and three year target, which were approved during award negotiations.

Item 5a: This is only completed for 4th quarter reports.

Utilizing the indicator noted under item 5, assess the change in the baseline measure. For example if your impact indicator is the unemployment rate, list the actual unemployment rate at the end of each budget period.

Item 5b: This is only completed for 4th quarter reports.

Utilizing the information stated in item 5a, check the box that corresponds to how the stated impact indicator was achieved at the end of each budget period.

Comments. Use this space to provide follow up comments on Items 5, 5a, and 5b or to report on any additional impact indicators being tracked.

Item 6: Native American Youth and Elder Opportunities:

Select “yes” if the project provided opportunities or activities for Native American youth or elders during this reporting period. Select “no” if the project did not provide opportunities for Native American youth or elders. Select “NA” (not applicable) if Native American youth or elders are not a component of the ANA project.

If opportunities were provided, complete the table as follows:

- Column one - enter each activity for the reporting period only.
- Column two - enter the number of youth participating in the specific activity.
- Column three - enter the number of new youth participating (first time participants) for the reporting period. For example, if you had 50 youth participate in quarter 1 and in quarter 2, 60 youth participated but only 10 were first time participants, please only input ten in this column.
- Column four - enter the number of elders that participated in the specific activity.
- Column five - enter the number of new elders participating (first time participants). For example, if you had 20 elders participate in quarter 1 and in quarter 2, 30 elders participated but only 10 were first time participants, please only input ten in this column.
- Column six – Check “yes” if the project included intergenerational activities during this reporting period and “no” if it did not.

Complete calculations at the bottom of the table.

- First row – Include totals for all new participants for the reporting period.
- Second row – Input the unduplicated number of youth and elders from the previous OPR.
- Third row – Add the first and second row together and input the amount in this row.

Item 6a: Intergenerational:

Check “yes” if the project included intergenerational activities between grandparents and grandchildren during this reporting period and “no” if it did not.

Item 7: Project Personnel:

Select “yes” if all key personnel were hired as outlined in the OWP. Select “no” if one or more key personnel were not hired as outlined in the OWP. If “no” is selected, list any positions which have not yet been filled and provide an explanation for why there were hiring delays and state when the position will be filled.

Item 7a: Select “yes” if there were any changes or turnover in key personnel, consultants or contractors in this reporting period or “no” if no changes occurred. If “yes,” list each position, consultant, or contractor that has changed and provide an explanation for the change. You should also note how long the position has been opened and if the position has been filled.

Item 7b: Jobs:

A job is classified as being currently filled and required for this project to be completed. Complete the table as follows:

- Column one - enter the position title for each job created.
- Column two - enter the name of the individual filling the position.
- Column three - enter the type of position (project position, consultant, stipend, intern, other).
- Column four - enter the year the job was created utilizing the drop down button.
- Column five - enter the quarter the job was created utilizing the drop down button.
- Column six - enter the hours worked per week by the position.
- Column seven - enter if the position was paid with federal funds or in kind.

This information is cumulative and should be maintained from the beginning of the grant to the last day of the project period.

Item 8: Project start / end dates

This is only completed for the 1st quarter reports.

Select “yes” if your project start date was delayed and “no” if your project was not delayed. If “yes” is selected, provide an explanation for why the project was delayed.

Item 9: Challenges:

Challenges are any issues or events which have negatively impacted the implementation of your project. Challenges occur for nearly every project and can be overcome through careful planning and monitoring. In some cases, technical assistance can be provided to assist grantees in overcoming challenges.

Select “yes” if your project encountered any challenges during the reporting period. Select “no” if you encountered no challenges. If you select “yes”, please provide a description of each challenge in the first column in the table below. In the second column select “yes” if the challenge was overcome and select “no” if you are still encountering this challenge. In the third column, describe how you overcame the challenge if you selected “yes” or identify your plan to address the challenge if you selected “no”.

Item 10: Expected Project Completion:

Select “yes” if you expect to complete your project on schedule and “no” if you do not. If “no” is selected, provide an explanation for why the project will not finish on schedule.

Item 11: Training / Technical Assistance:

Select “yes” to request training or technical assistance (T/TA) to complete the project objectives. Select “no” if no T/TA is needed to complete the project objectives. If yes, explain what type of assistance is requested and the reasons for the request.

Item 12: Project Sustainability:

Mark the box that most accurately describes your Tribe’s or organization’s level of funding to sustain this project or its benefits after this grant has ended.

Item 13: Project Sustainability:

Describe any steps that have been taken to ensure the benefits of the project will be sustained after funding ends (e.g. capital campaign, securing other grants, folding project activities into existing tribal programs, etc.).

Note: *Using ANA funds for fundraising activities is not allowed.*

Item 14: Financial:

Select “yes” if the Tribe or organization had trouble accessing (drawing down) funds from the Division of Payment Management (DPM) during the reporting period. Select “no” if not. If “yes” is selected explain the problem and if it was resolved.

Item 15: Financial:

Select “yes” if an approved revision was made to the budget during the reporting period. A budget revision is a change in the dollar amount of a line item. Select “no” if there was not a budget revision during the reporting period.

If a revision was made, select “yes” if a request was made for the change to the Awarding Agency and provide comments and the date requested. Select “no” if no request was submitted.

If a request was submitted, select “yes” if the budget revision was approved by the Awarding Agency and provide comments and the date approved. Select “no” if the budget revision was not approved by or a response has not been received from the Awarding Agency.

Note: *This does not take the place of submitting a formal request. All standard procedures for requesting a budget modification must be followed.*

Item 16: Financial:

Enter the federal and non-federal forecasted cash needs from the Standard Form 424A of the approved grant application for the reporting period. Enter the actual cash needs (expenditures) for the reporting period, which should align with what is reported on the SF-425. This information is cumulative and should be maintained from the beginning of the grant to the last day of the budget period.

Item 16a.: If forecasted and actual amounts are not the same, explain the reason for the difference for each quarter.

Item 17: Select “yes” if you anticipate obligating all funds by the end of the budget period. Select “no” if you do not anticipate obligating all funds by the end of the budget period. If “no”, please explain the reason why and the amount you anticipate not obligating.

Item 18: Financial / Project Income:

Select “yes” if your project generated any program income. Select “no” if your project did not generate any program income. If your project generated program income, please identify the source of program income.

Item 19: Other:

Add any additional information your organization would like to share with ANA regarding your project.

Items 20 – 26: These questions apply only to projects funded under the Native Asset Building Initiative.

- Question 20: Include in the table below all “nonfederal” funding you have deposited in to the Project Reserve Fund to match your AFI grant. (Remember, for every dollar of AFI grant funds, you must obtain an equal dollar of matching funds). In the first column enter the source of funding. In the second column enter the amount of funding. In the third column enter the date of receipt of funds. In the fourth column enter the number of IDAs funding will support. In the fifth column enter the asset goals this funding will support.
- Question 21(a): If you have not yet secured matching funds identify sources of “nonfederal” funding sources that you plan to obtain to match your AFI grant. In the first column enter the source of funding. In the second column enter the amount of funding. In the third column enter the date of receipt the commitment letter is expected. In the fourth column enter the date of receipt of funds expected. In the fifth column enter number of IDAs funding will support. In the sixth column enter the asset goals this funding will support.
- Question 21(b): For each of the funding sources identified in the table above, please list activities planned to secure the funding. In the first column enter the anticipated source of funding. In the second column enter the date funding is anticipated. In the third column enter the activity planned to secure funding. In the fourth column enter the description. In the fifth column enter if the funding is tentative or confirmed.

- Question 22: Provide a written explanation of how the narrative report aligns with the financial status report. For example, link expenditures to program outcomes by including information on the total number of participants who have received matched withdrawals as of the end of the reporting period, the amount they have received, and a summary of administrative costs incurred.
- Question 23: Highlight any practices, procedures, or experiences that might be helpful as models for other grantees to improve overall AFI performance.
- Question 24: Briefly describe project outreach and information dissemination carried out over the reporting period. List and include a copy of any newspaper, newsletter, and magazine articles as well as other published materials. If dissemination activities have been discussed in the OPR section above, please reference that section.
- Question 25: Briefly describe the project plan going forward.
- Question 26: Provide any additional comments you would like to share about your AFI IDA project or your comprehensive asset-building project.

Prior to submitting the OPR, ANA recommends using the following checklist to ensure all the required information is submitted.

OBJECTIVE PROGRESS REPORT CHECKLIST	YES	NO
Is there a description for each activity that the OWP states will have activity during the quarter being reported?		
Is the forecasted amount of federal and non-federal taken from the SF 424A?		
Does the actual amount of federal and non-federal expenditures reported align with the SF-425?		
Program income is revenue generated as a result of a grant activity. Did you generate any program income?		
Did you make any changes to the budget that required a formal modification (new NGA)?		

OBJECTIVE PROGRESS REPORT CHECKLIST	YES	NO
Did you report the information for each indicator for the quarter?		
Do the resources leveraged listed total the cumulative amount stated in the Impact Indicators?		
If you list an activity as intergenerational were both youth and elders participating in the activity?		
Did you list all of the jobs (both staff and consultants) since the start of the project?		
Did you provide additional information about your ANA project?		
Did you check each question (1 through 19) to make sure that all were answered?		
Did you have someone review the report to ensure all questions were answered?		

Activity: OPR Review

Using the ANA Case Study, Sample OPR, and Expenditures do an assessment of the sample project

Fill out the below information.

OWP:

Based on the OWP, did they complete the activities planned for this quarter?

Yes No

Based on your analysis, is the grantee on track to complete the project as designed?

Yes No

If no, please explain:

Do the financial amounts listed in question 16 reconcile with the expenditures?

Yes No

Is there a variance between the forecasted and actual federal expenditures?

Yes No

If no, is there an explanation? Comments:

Is there a variance between the forecasted and actual non federal expenditures?

Yes No

If no, is there an explanation? Comments:

Did the grantee report correctly on all impact/performance indicators?

Yes No

Are the Impact Indicators the approved indicators in the proposal?

Yes No

Comments:

Leveraged Resources. Does it reconcile with Question 11?

Yes No

Comments:

Partnerships. Does it reconcile with Question 11?

Yes No

Comments:

Are all key staff positions in place?

Yes No

If no, what positions have not been filled?

If the grantee requested technical assistance, please explain need.

NA

Explain:

What follow-up action is required for this grantee? (Please be specific)

None needed for this quarter

Comments:

Financial Status Report Standard Form 425 (SF-425)

1. Federal Agency and Organizational Element to Which Report is Submitted		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)			Page 1	of pages
3. Recipient Organization (Name and complete address including Zip code)						
4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)		6. Report Type <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting <input type="checkbox"/> Cash <input type="checkbox"/> Accrual	
8. Project/Grant Period (Month, Day, Year) From: To:				9. Reporting Period End Date (Month, Day, Year)		
10. Transactions					Cumulative	
(Use lines a-c for single or multiple grant reporting)						
Federal Cash (To report multiple grants, also use FFR Attachment):						
a. Cash Receipts						
b. Cash Disbursements						
c. Cash on Hand (line a minus b)						
(Use lines d-o for single grant reporting)						
Federal Expenditures and Unobligated Balance:						
d. Total Federal funds authorized						
e. Federal share of expenditures						
f. Federal share of unliquidated obligations						
g. Total Federal share (sum of lines e and f)						
h. Unobligated balance of Federal funds (line d minus g)						
Recipient Share:						
i. Total recipient share required						
j. Recipient share of expenditures						
k. Remaining recipient share to be provided (line i minus j)						
Program Income:						

l. Total Federal program income earned							
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)							
11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
g. Totals:					0	0	0

12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:	
13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and intent set forth in the award documents. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
a. Typed or Printed Name and Title of Authorized Certifying Official	c. Telephone (Area code, number, and extension)
	d. Email Address
b. Signature of Authorized Certifying Official	e. Date Report Submitted (Month, Day, Year)
	14. Agency use only:

Standard Form 425 - Revised 6/28/2010
OMB Approval Number: 0348-0061
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Financial Status Report Standard Form 425 (SF-425) Directions

The financial report is the Federal Status Report Standard Form (SF)-425. The short form of SF-425, the SF-425A, is not acceptable. The SF-425 provides information on the expenditures by the grantee to the ANA program specialist and OGM grants management specialist.

The SF-425 is due 30 days after each three-month period and 90 days after the end of the project period. If the grantee has a multi-year grant, the grantee will only report on those funds provided for that budget period and should not provide cumulative totals from previous years.

Detailed instruction on how to complete the Financial Status Report SF-425 is below.

Box 1: Enter HHS, Administration for Native Americans

Box 2: Enter the grant number, which is on the Notice of Grant Award in Box 3

Box 3: Enter the name and address of the tribe or native organization

Box 4: Enter the tribe or native organization's employer identification number (EIN)

Box 5: Optional, enter an internal identification if that is the policy of the tribe or native organization

Box 6: Check no if this is a quarterly report and yes if it is the final report

Box 7: Check cash if the tribe or native organization's accounting system is maintained on a cash basis or check accrual if the accounting system is maintained on an accrual basis. The grantee's tribe or organizations accountant can provide this information.

Box 8: Enter the month, day, and year the grant began and the month, day, and year the grant ends

Box 9: Enter the starting month, day, and year and the ending month, day, and year for the period that you are preparing.

Box 10.a: Enter total gross program outlays. Include disbursements of cash realized as program income if that income will also be shown on lines 10c or 10g. Do not include program income that will be shown on lines 10r or 10s. For reports prepared on a cash basis, outlays are the sum of actual cash disbursements for direct costs for goods and services, the amount of indirect expense charged, the value of in-kind contributions applied, and the amount of cash advances and payments made to sub recipients. For reports prepared on an accrual basis, outlays are the sum of actual cash disbursements for direct charges for goods and services, the amount of indirect expense incurred, the value of in-kind contributions applied, and the net increase or decrease in the amounts owed by the recipient for goods and other property received, for services performed by employees, contractors, sub grantees and other payees, and other amounts becoming owed under programs for which no current services or performances are required, such as annuities, insurance claims, and other benefit payments.

Box 10.b: Enter any receipts related to outlays reported on the form that are being treated as a reduction of expenditure rather than income, and were not already netted out of the amount shown as outlays on line 10a.

Box 10.c: Enter the amount of program income that was used in accordance with the deduction alternative.

Note: *Program income used in accordance with other alternatives is entered on lines q, r, and s. Recipients reporting on a cash basis should enter the amount of cash income received; on an accrual basis, enter the program income earned. Program income may or may not have been included in an application budget and/or a budget on the award document. If actual income is from a different source or is significantly different in amount, attach an explanation or use the remarks section.*

Box 10.d: e, f, g, h, l and j are self-explanatory.

Box 10.k: Enter the total amount of unliquidated obligations, including unliquidated obligations to sub grantees and contractors. Unliquidated obligations on a cash basis are obligations incurred, but not yet paid. On an accrual basis, they are obligations incurred, but for which an outlay has not yet been recorded. Do not include any amounts on line 10k that have been included on lines 10a and 10j. On the final report, line 10k must be zero.

Box 10.l: Self-explanatory

Box 10.m: On the final report, line 10m must also be zero.

Box 10.n: o, p, q, r, s, and t are self-explanatory.

Box 11.a: Self-explanatory

Box 11.: Enter the indirect cost rate in effect during the reporting period.

Box 11.c: Enter the amount of the base against which the rate was applied.

Box 11.d: Enter the total amount of indirect costs charged during the report period.

Box 11.e: Enter the federal share of the amount in 11d.

Note: *If more than one rate was in effect during the period shown in item 8, attach a schedule showing the bases against which the different rates were applied, the respective rates, the calendar periods during which they were in effect, amounts of indirect expense charged to the project, and the federal share of indirect expense charged to the project to date.*

Submission Instructions

Email a signed copy to: anareports@acf.hhs.gov and cc your program specialist and grants specialist.

Activity: Fill out a Financial Report – Quarter 1

1. Federal Agency and Organizational Element to Which Report is Submitted DHHS/ACF/ANA		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment) 90AZNA000		Page 1	of pages
3. Recipient Organization (Name and complete address including Zip code) Organization 123 School Drive Phoenix, AZ 11111					
4a. DUNS Number 555555	4b. EIN 55-5555555	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment) 20		6. Report Type <input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual
8. Project/Grant Period (Month, Day, Year) From: 10/1/12 To: 9/30/13			9. Reporting Period End Date (Month, Day, Year) 12/31/12		
10. Transactions				Cumulative	
(Use lines a-c for single or multiple grant reporting)					
Federal Cash (To report multiple grants, also use FFR Attachment):					
a. Cash Receipts					
b. Cash Disbursements					
c. Cash on Hand (line a minus b)					
(Use lines d-o for single grant reporting)					
Federal Expenditures and Unobligated Balance:					
d. Total Federal funds authorized					
e. Federal share of expenditures					
f. Federal share of unliquidated obligations					
g. Total Federal share (sum of lines e and f)					
h. Unobligated balance of Federal funds (line d minus g)					
Recipient Share:					

i. Total recipient share required							
j. Recipient share of expenditures							
k. Remaining recipient share to be provided (line i minus j)							
Program Income:							
l. Total Federal program income earned							
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)							
11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
				g. Totals:	0	0	0
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:							
13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and intent set forth in the award documents. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)							
a. Typed or Printed Name and Title of Authorized Certifying Official					c. Telephone (Area code, number, and extension)		
					d. Email Address		
b. Signature of Authorized Certifying Official					e. Date Report Submitted (Month, Day, Year)		
14. Agency use only:							

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Activity: Fill Out a Financial Report – Quarter 2

1. Federal Agency and Organizational Element to Which Report is Submitted DHHS/ACF/ANA		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment) 90AZNA000		Page 1	of pages
3. Recipient Organization (Name and complete address including Zip code) Organization 123 School Drive Phoenix, AZ 11111					
4a. DUNS Number 555555	4b. EIN 55-5555555	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment) 20	6. Report Type <input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual	
8. Project/Grant Period (Month, Day, Year) From: 10/1/12 To: 9/30/13			9. Reporting Period End Date (Month, Day, Year) 3/31/13		
10. Transactions			Cumulative		
(Use lines a-c for single or multiple grant reporting)					
Federal Cash (To report multiple grants, also use FFR Attachment):					
a. Cash Receipts					
b. Cash Disbursements					
c. Cash on Hand (line a minus b)					
(Use lines d-o for single grant reporting)					
Federal Expenditures and Unobligated Balance:					
d. Total Federal funds authorized					
e. Federal share of expenditures					
f. Federal share of unliquidated obligations					
g. Total Federal share (sum of lines e and f)					
h. Unobligated balance of Federal funds (line d minus g)					
Recipient Share:					
i. Total recipient share required					

j. Recipient share of expenditures							
k. Remaining recipient share to be provided (line i minus j)							
Program Income:							
l. Total Federal program income earned							
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)							
11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
				g. Totals:	0	0	0
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:							

13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and intent set forth in the award documents. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
a. Typed or Printed Name and Title of Authorized Certifying Official	c. Telephone (Area code, number, and extension)
	d. Email Address
b. Signature of Authorized Certifying Official	e. Date Report Submitted (Month, Day, Year)
14. Agency use only:	

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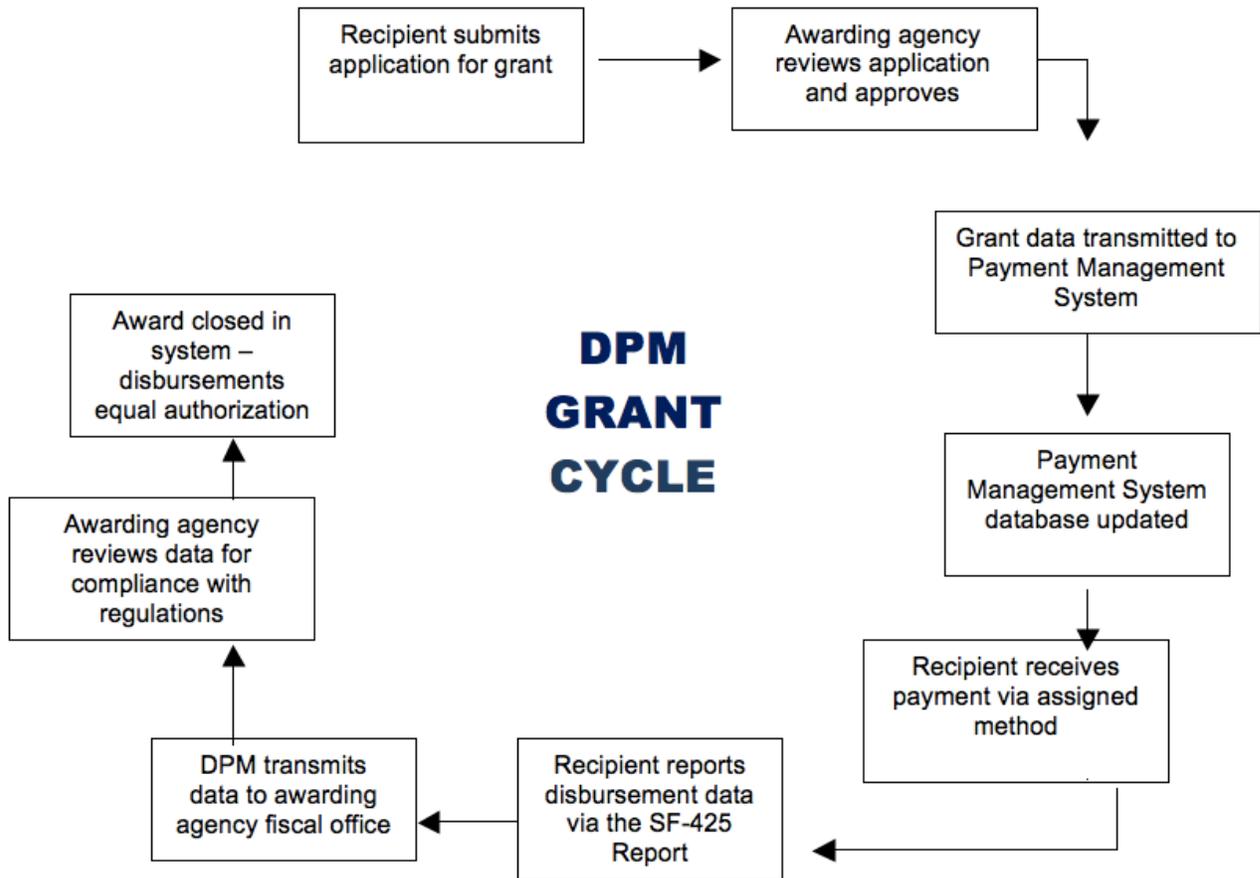
Division of Payment Management (DPM) Overview

Congress authorized the Grants Management Fund to facilitate the administration of payments to the HHS recipients of federal assistance awards. DPM operates this Grants Management Fund, also known as the Payment Management System (PMS). PMS was established to create a central point capable of paying most federal assistance grants and contracts. The main purpose of the system is to serve as the fiscal intermediary between awarding agencies and the recipients of grants and contracts, with particular emphasis on:

1. Expediting the flow of cash between the federal government and recipients;
2. Transmitting recipient disbursement data back to the awarding agencies; and
3. Managing cash advances to recipients.

The graphic below shows the life cycle of a grant through DPM:

If the tribe or native organization is currently receiving funds from HHS there is already an account established with DPM and the ANA grant will be added to the DPM account.



Cash Management Reports (FFR-425)

Instructions of using PMS to complete the FFR-425 portion that replaces the PSC-272

To prepare the Division of Payment Management Federal Financial Report (FFR 425) you will need the following information:

- User ID
- Password
- Account Number
- Cumulative Expenditures for the grant

Instructions for Completing the Division of Payment Management Federal Financial Report (FFR 425).

1. Go to <http://www.dpm.psc.gov/>
2. On the first screen click on the button in the right top corner that says "Payment Management System Logon Link".
3. The next screen is the DPM Secure Systems Login Links and click on "Payment Management System". The URL should be at http://www.dpm.psc.gov/access_pms/system_status.aspx
4. The system will then prompt you for your User ID and Password. Enter your User ID and Password.
5. At this screen click on the button that says "Click Here for Access to the Payment Management System". The URL should be at <https://pmssec.dpm.psc.gov/pls/pmsprod/pms.home>
6. At this screen on the left hand side you can select from four options
 - a. Inquiry
 - b. Payment
 - c. Disbursement
 - d. My User Info
7. Select Disbursement. The URL should be at https://pmssec.dpm.psc.gov/pls/pmsprod/pms_start.pms_frame_set
8. At this screen on the left hand side you have seven options
 - a. Inquiry
 - b. Payment
 - c. Disbursement
 - i View SF 425 Reports
 - ii FFR Cash Transaction
 - d. Report
 - i FFR Interest Income
 - ii FFR File Transfer

e. My User Info

9. Select "FFR Cash Transactions".
10. At this screen you must put in your Payee Account Number. Also make sure that the following buttons are clicked and then click on "Continue" in the bottom right corner.
11. Reporting Period – Current
12. Report Status – All Report Statuses
13. At this screen titled FFR Reports; check to make sure the proper report period is in the first box and enter your Payee Account Number in the second box and click on "Continue".
14. At this screen Under "Action" click on complete.
15. At this screen you have two options. If you have more than one grant flowing through the Division of Payment Management you click on "Attachment". If ANA is the only grant you have flowing through the Division of Payment Management you will click on "Report Disbursements".
16. On this screen you will enter the Cumulative Federal Cash Disbursement Amount in the box on the right hand side. Then click "Continue".
17. This will take you back to and you will find that Line 10.1. Cash Available and Cash Disbursements will be prepopulated.
18. On line 10.c. you subtract "Cash Disbursements from Cash Available and enter that number into 10.c. "Cash on Hand".
19. Type in your name on 13.b. and certify.
20. Click the certification box and submit.

Activity: Cash Draw Down

Administration for Native Americans Grant

Federal Share: \$102,189.00

Table 15: Cash Draw Downs

Month	Amount (\$)
November	1,500.00
December	7,500.00
January	14,369.00
February	7,500.00

The organization has made four cash draw downs on the grant. The Finance Officer is getting ready to make the fifth draw down. Based on the expenditures through March 31, 2013 in the case study and the funds already drawn down how much should the Finance Officer draw down?

\$

Section 4: Regulations and Cost Principles

The management of an ANA grant requires a working knowledge of the financial assistance rules and regulations and basic cost principles of HHS. HHS rules and regulations are contained in Title 45 of the Code of Federal Regulations (45 CFR) and the cost principles are detailed in Office of Management and Budget (OMB) Circulars. More detailed information on how HHS implements the CFRs and OMB Circulars is in the Grants Policy Statement, available at: http://www.acf.hhs.gov/grants/grants_resources.html

Code of Federal Regulations (CFRs)

Federally recognized tribal governments are required to follow the rules and regulations in 45 CFR Part 92 “uniform administrative requirements for awards and sub awards to state, local, and Indian tribal governments.”

Non-profit organizations are required to follow the rules and regulations in 45 CFR Part 74 “uniform administrative requirements for awards and sub awards to institutions of higher education, hospitals, other non-profit organizations and commercial organizations.”

All grantees, including faith-based organizations, are also required to follow the rules and regulations in 45 CFR Part 87. 45 CFR Part 87 details some limitations on permissible use of federal funds for faith-based organizations:

- Direct government funding cannot be used to pay for inherently religious activities such as worship, religious instruction, and proselytizing.
- When the program is paid for by direct government funding, inherently religious activity must be separate, in either time or location, from the ANA-funded service, and the activities must be voluntary for beneficiaries.
- When an organization receives indirect funding, there is no restriction on incorporating inherently religious activities into a program, given the fact that the beneficiary is guaranteed a choice among providers.

45 CFR Part 87 also details some protections for the beneficiaries of the program:

- Beneficiaries must be served without discrimination on the basis of religion or religious belief when the providing organization receives direct government funding;
- Although a beneficiary can be invited to participate in privately-funded inherently religious activities, participation must be voluntary for the beneficiaries of a directly-funded program.
- In an indirect funding program, the beneficiary is guaranteed a genuine and independent private choice among providers.

This is only a summary. Specific questions should be researched in the complete 45 CFR Part 74 or 92 for the specific regulation.

Financial Assistance Rules

The financial assistance rules establish uniform policies and procedures for the award and administration of an ANA grant. The four major subparts are as follow:

- Subpart A – General
- Subpart B – Pre-award requirements
- Subpart C – Post-award requirements
- Subpart D – After the grant requirements.

The chart below lists comparable sections of 45 CFR Parts 74 and 92 and provides an index of the topics to be covered in this section.

SECTION	45 CFR Part 74 (Non-Profits)	45 CFR Part 92 (Governments)
General Requirements	74.1 – 74.5	92.1 – 92.6
Pre-Award Requirements	74.11 – 74.17	92.10 – 92.12
Financial Admin./Management	74.20 – 74.28	92.20 – 92.44
Property Standards	74.30 – 74.37	92.30 – 92.35
Procurement Standards	74.40 – 74.48	92.36
Reports and Records	74.50 – 74.53	92.40 – 92.42
Termination & Enforcement	74.60 – 74.62	92.43 – 92.44
After-the-Award	74.70 – 74.73	92.50 – 92.52

Pre-award Requirements

The rules detailing the forms and instructions to be used when applying for federal financial assistance are:

- 45 CFR Part 92.10 for state, local, and tribal governments
- 45 CFR Part 74.10-.12 for non-profit organizations

There are no significant differences between the CFRs for governments and non-profits organizations for pre-award requirements.

Applicants submitted the original and two copies of their application to ANA for funding consideration. For revisions or amendments to a previously submitted application, only the affected pages need to be submitted.

The NGA may list special restrictive conditions of the award in box 26. The special restrictive conditions of awards defined in 45 CFR Part 92.21 for governments and 45 CFR Part 74.14 list the circumstances under which a grantee or sub grantee will be considered high risk, such as: a history of unsatisfactory performance, financial instability, a management system that does not meet standards, nonconformance in prior award, or not

otherwise responsible. If the NGA lists any restrictive conditions, ANA will provide a written explanation of the conditions and the corrective action.

Post-award Requirements

Financial Management

Tribal Governments: 45 CFR Part 92.20

Non-profit Organizations: 45 CFR Part 74.21

Financial management systems must meet the following minimum standards:

- Provide for accurate, current, and complete disclosure of all financial activities;
- Maintain records that identify the source and application of funds;
- Maintain effective control and accountability of all grant cash, property, and other assets;
- Compare actual expenditures with budgeted amounts on a periodic basis;
- Determine allowable costs by OMB cost principles, program regulations, and grant agreement;
- Have accounting records supported by source documentation; and
- Have procedures to minimize the time elapsing between the transfer of funds from the U.S. Treasury and disbursement by the grantee.
- Grantees should have no more than three days cash on hand

45 CFR 92.20 for governments states that an agency may review the adequacy of the grantee's financial management system as part of a pre-award review and 45 CFR 74.21 for non-profit organizations states the federal government may require specific insurance/bonding if certain conditions exist.

Prior Approval Requirements

Tribal Governments: 45 CFR Part 74.25

Non-profit Organizations: 45 CFR Part 92.30

Prior approval from ANA is required for certain actions. Details are in Section 5 of this manual.

Payment

Tribal Governments: 45 CFR Part 92.21

Non-profit Organizations: 45 CFR Part 74.22

The methods and procedures for payment shall minimize the time elapsing between the transfer of funds and disbursement by the grantee. The methods that can be use are:

- Advances (for grantees and sub grantees that meet standards)
- Reimbursements (when requirements are not met or for construction contracts)
- Working capital advances (if a grantee or sub grantee does not meet the criteria for advance payments)

Payments cannot be withheld from a grantee unless:

- Grantee has failed to comply with the grant award conditions;
- Grantee is indebted to the United States Government.

Grantees are encouraged to use minority owned banks. 45 CFR Part 92.21 for governments states that the use of a separate bank account can be required through federal-state agreement and that the grantee may keep up to \$100 of interest earned for administrative expenses. 45 CFR Part 74.22 for non-profit organizations states that grantee shall maintain advances in interest bearing accounts unless the grantee receives less than \$120,000 in federal awards per year, the interest is not expected to exceed \$250, and/or the depository requires an average or minimum balance so high that it would not be feasible.

Allowable Costs

Tribal Governments: 45 CFR Part 92.22

Non-profit Organizations: 45 CFR Part 74.27

Allowable costs are detailed in three separate OMB circulars:

- OMB Circular A-87: Cost Principles for State, Local and Tribal Governments
- OMB Circular A-122: Cost Principles for Non-Profit Organizations
- OMB Circular A-21: Cost Principles for Institutions of Higher Educations

While many of the OMB circular cost principles are the same in governments and for non-profit organizations, there are some differences:

- The cost principles for non-profit organizations do not address cost allocation plans;
- The cost principles do not address the exact same cost categories; and
- The circular for non-profit organizations addresses the treatment of bid and proposal costs and independent research and development costs, whereas the circular for governments does not.

Period of Availability of Funds

Tribal Governments: 45 CFR Part 92.23

Non-profit Organizations: 45 CFR Part 74.28

When a funding period is specified, the grantee may charge to the award only costs resulting from obligations during the funding period. 45 CFR Part 92.23 addresses the period for liquidation of obligations and carryover of unobligated balances and 45 CFR Part 74.28 addresses the allowability of pre-award costs with funding source approval.

Matching or Cost Sharing

Tribal Governments: 45 CFR Part 92.24

Non-profit Organizations: 45 CFR Part 74.23

All contributions, including cash and in-kind, shall be accepted as part of the grantee's cost sharing of matching if the contributions:

- Are verifiable through records;
- Are not applied to other federal programs;
- Are necessary for the completion of the project;
- Are allowable under the cost principles;
- Are not paid by other federal funds (unless approved by statute);
- Are provided for in the approved budget; and
- Conform to other provisions of the financial management OMB circulars.

Program Income

Tribal Governments: 45 CFR Part 92.25

Non-profit Organizations: 45 CFR Part 74.24

Program income is gross income generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period. The methods for treatment of program income include:

- addition
- deduction
- cost sharing

ANA utilizes the additive alternative for the treatment of program income.

The HHS Grants Policy Statement goes into further detail on the use of program income alternatives in Exhibit 7.

Table 16: Use of Program Income Alternatives

Alternative	Use of program income
Additive	Added to funds committed to the project or program and used to further eligible project or program objectives
Deductive	Deducted from total allowable costs of the project or program to determine the net allowable costs on which the Federal share of costs will be based
Matching	Used to satisfy all or part of the non-Federal share of a project or program
Combination	Uses all program income up to (and including) \$25,000 as specified under the additive alternative and any amount of program income exceeding \$25,000 under the deductive alternative

Unless authorized by federal regulations or grant agreement, program income will be treated as gross program income. In the event that the HHS awarding agency does not specify in the terms and conditions of the award how program income is to be used, the deductive alternative shall apply automatically to all projects or programs except research.

Exhibit 8 from the HHS Grants Policy Statement summarizes the accountability requirements related to the timing of earning and using program income.

Table 17: Summary of Accountability Requirements for Program Income

If program income is earned...	and that income is ...	then the recipient is...
During the project period	Received and expended during the project period	Required to use program income as provided in the NOA
During the project period	Received and expended after the project period	Required to adjust the final FFR to reflect receipt and use of the income as directed by the Grants Management Officer (GMO).
During the project period	Received during the project period but expended after the project period because (1) earned during the final budget period of the project period or (2) with GMO approval	(1) Required to use income as provided in the NOA and adjust final FSR accordingly (if earned during the final budget period of the project period) or (2) use the income under addition alternative and report as specified by the GMO
After the project period	Received and expended after the project period	Not accountable for that program income unless specifically provided in the NOA

Activity: Community Business Development ANA Grant

Item Donated	Value	Documentation	Allowable Non-Federal Share	Allowable Leveraged Resources	Program Income
The State of Ohio awarded a grant of \$10,000 to the organization to provide stipends to the participants.					
A statistician from the local University provided 40 hours of technical support to set up the data base for the ANA project. Her salary is \$25 per hour.					
The Business Development Specialist provided 100 hours of technical support to the participants of the project.					
Hewlett Packard donated one computer with extensive capabilities to the project. The retail value of the computer is \$5,650.					
The Organization secured \$12,500 worth of software for the project and only had to pay \$250.					
A local business paid the organization \$500 to review their business plan and make recommendations.					

Item Donated	Value	Documentation	Allowable Non-Federal Share	Allowable Leveraged Resources	Program Income
Five business owners provided volunteer services to the organization and served as mentors to five participants. They contributed 200 hours of volunteer time valued at \$25 per hour.					
The community college computer sciences department developed the organization's website at no cost. The organization had received a quote of \$5,000 for website development.					
A local restaurant donated meals for the graduation from the program recognition. The value of the meals was \$350.					
A local printer provided printing on the project. The cost for the printing would have been \$200.					

Activity: Match Share (also known as Non Federal Share) and Leveraged Resources

Match share is the grantee’s resources appropriated for the project. The Match share can be cash, donated goods, or donated services. The resources cannot include other federal funds unless the legislation for the funds specifically state that they can be used as non federal share for other federal programs. List each of your resources that will be used for match share, how you will attach a dollar value to the service or goods, and what source documents you will collect to support the match share. These amounts can be found in your grant application.

Line Item	Method of Valuation	Source Documentation

Leveraged resources are both federal and non federal cash, goods, and services that support the project and have not been applied as part of the non federal share. List each of your resources that could be used as leveraged resource, how you will attach a dollar value to the service or goods, and what source documents you will collect to support the leverage resources. This amount and where it comes from can be found in your grant application.

Line Item	Method of Valuation	Source Documentation

Non-Federal Audit

Tribal Governments: 45 CFR Part 92.26

Non-profit organizations: 45 CFR Part 74.24

Tribal governments and non-profit organizations are subject to the audit requirements in OMB Circular A-133: Audits of State, Local and Tribal Governments and Non-Profit Organizations.

Property, Equipment and Subawards

Real Property and Equipment

Tribal Governments: 45 CFR Part 92.31 - .32

Non-profit organizations: 45 CFR Part 74.30 - .34 and .36 - .37

Real property means land and structures. Title to real property is vested with the grantee. The awarding agency will provide instructions for the disposition of real property when it is no longer needed. **ANA does not allow the purchase of real property with ANA funds.**

Equipment is defined as tangible, nonexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Title to equipment acquired under a grant is vested with the grantee unless specified otherwise. Equipment shall be used for the program or project for which it was acquired. The equipment may be used for other federally supported projects if it does not interfere with the project for which it was originally acquired. If replacement equipment is needed, the equipment to be replaced may be used as a trade-in.

Property management requirements include the following:

- Property records must include a description, serial number, source, title, cost, acquisition date, percent of federal participation, location, use, condition, and ultimate disposition;
- Physical inventory must be done at least every two years;
- A control system to ensure safeguards against loss, damage, or theft;
- Adequate maintenance procedures; and
- Proper sales procedures. Items with a fair market value (F.M.V) of \$5,000 or less that are no longer needed can be disposed of with no further obligations. Items over \$5,000 F.M.V. require the awarding agency to receive its fair share.

Federally owned equipment requires a recipient to submit an annual inventory listing. When the equipment is no longer needed a grantee should request disposition instructions from the federal agency.

45 CFR Part 92.32 requires governments to follow state law for the management of equipment and 45 CFR Part 74.31 requires nonprofit organizations provide insurance coverage.

Supplies

Tribal Governments: 45 CFR Part 92.33

Non-profit organizations: 45 CFR Part 74.35

Title to supplies acquired under an award is vested with the grantee. Upon termination or completion of the award, if there is a residual inventory of unused supplies exceeding \$5,000 in total fair market value and if the supplies are not needed for any other federally sponsored programs, the grantee shall compensate the awarding agency for its share. 45 CFR Part 74.35 states that non-profit organization grantees shall not use supplies acquired with federal funds to provide services for a fee that is less than private companies to non-federal outside organizations unless approved by ANA.

Procurement Standards

Tribal Governments: 45 CFR Part 92.36

Non-Profit Organizations: 45 CFR Part 74.40 - .48

Grantee must meet the following procurement standards:

- There must be a contract administration system;
- There must be a written code of standards of conduct governing the grantee or sub grantee's employees;
- Procedures must avoid the purchase of unnecessary or duplicative items;
- Grantees are encouraged to enter into state, local, and tribal inter-governmental agreements for purchasing common goods and services;
- Grantees are encouraged to use federal excess and surplus property;
- Procedures must ensure awards are only given to responsible contractors;
- Records must detail the significant history of procurement;
- Grantees must settle all contractual and administrative issues arising out of procurement; and
- Grantees must have protest procedures.

All procurement transactions must be conducted in a manner providing full and open competition. There must be written selection procedures. The solicitation must also include a clear and accurate description of the service or material being procured. The approved methods of procurement are:

- Small purchase procedures;
- Sealed bids (formal advertising);
- Competitive proposals; and
- Non-competitive proposals may only be used when the item is available from one source, in emergency situations, when the awarding agency authorizes, or when competition is determined to be inadequate. Pre-award review may be required for non-competitive procurement.

Grantees are to give preference to minority firms, women's business enterprises, and labor surplus area firms. There must be a cost or price analysis in connection with every procurement action. Grantees must make proposed procurement technical specifications available upon request by ANA. The bonding requirements of a grantee will be accepted if ANA's interest is adequately protected. If not, there are specific requirements described in 45 CFR Part 74 and Part 92.

Reports, Records Retention, and Enforcement

Monitoring and Reporting Program Performance

Tribal Governments: 45 CFR Part 92.40

Non-Profit Organizations: 45 CFR Part 74.50

The grantee must periodically report progress in meeting program objectives. This must include a comparison of accomplishments with planned objectives, explanations of why goals have not been met, and other pertinent information. Performance reports, such as the OPR, shall not be required more frequently than quarterly or less frequently than annually. Quarterly and semi-annual reports are due 30 days after the completion of the reporting period. Annual and final reports are due 90 days after the end of the project period.

Financial Reporting

Tribal Governments: 45 CFR Part 92.41

Non-Profit Organizations: 45 CFR Part 74.52

Financial reports, as required in the terms and conditions of the award, are submitted on the following forms:

- SF-425 – Financial Status Report
- SF-425 - Federal Financial Report

The report is not required more frequently than quarterly and must be submitted 30 days after the end of the reporting period and 90 days after the end of the project period for the final report.

Records Retention

Tribal Governments: 45 CFR Part 92.42

Non-Profit Organizations: 45 CFR Part 74.53

Grantees must retain records for **three years** after submission of the final expenditure report. Records must be retained until action is completed on all litigation, claims, negotiations, or audits. For property and equipment, the retention period starts upon disposition.

Close Out

Tribal Governments: 45 CFR Part 92.50

Non-Profit Organizations: 45 CFR Part 74.71

ANA requires the following final reports:

- Objective Evaluation Report (OER)
- Final SF-425
- Final DPM report if applicable

If applicable, the grantee should submit an invention disclosure, and a federally-owned property report. As appropriate, the grantee should make cost and cash adjustments.

Cost Principles

45 CFR Part 92 and 74 requires grant recipients to follow the OMB cost principles contained in OMB A-87 for governments, OMB A-122 for non-profit organizations and OMB A-21 for institutions of higher education, which set forth the principles for determining the allowable costs of programs under grants, contracts, and cooperative agreements with the federal government.

The cost principles address four major areas:

- Basic Guidelines for Costs
- Cost Allocation Plan
- Indirect Cost
- Allowability for Selected Costs

Basic Guidelines for Costs

- Costs are allowable if they are necessary and reasonable, not prohibited under state, local, or tribal laws, conform to laws and regulations, given consistent treatment, comply with generally accepted accounting principles, and are not included as a cost under other federal programs.
- Allocable costs assigned must be in proportion to the benefits received, cannot be shifted to overcome deficiencies in other programs, and must be supported by a cost allocation plan.
- Applicable credits are to be used to reduce expenditures applicable to a given grant.
- The total cost of a grant program is comprised of the allowable direct and allowable indirect costs less applicable credits.

Cost Allocation Plan

Cost allocation plans are addressed in OMB A-87 and, although not specifically addressed, the same basic principle is discussed under direct costing of indirect costs in OMB A-122.

Costs incurred by an agency in connection with programs are eligible charges against grants and contracts, whether incurred by the program itself or another program which provided

supportive services to the program, provided the costs are necessary for the efficient conduct of the grant or contract.

The cost principles are the federal regulations which must be followed to ensure that federally assisted programs incur costs in a manner in which each program pays its fair share of costs recognized under these principles, except where restricted by law.

Costs can be shared within the same funding source as well as between funding sources depending on the specific requirements of each funding source.

A cost allocation plan documents the methods and procedures used to identify, accumulate, and distribute allowable costs in a consistent and equitable manner to services provided. The cost allocation plan should be approved by the designated representative of the agency or the governing body. All costs allocated by the plan must be supported by formal accounting records that substantiate their propriety. The cost allocation plan links the accounting records and the reported expenses of the tribe or native organization.

The cost allocation plan should contain, but not necessarily be limited to, the following:

- The nature and extent of the activities provided and their relevance to the contract service.
- A list of the expense items to be charged to the service.
- The methods to be used in distributing the costs.

Development of Cost Allocation Plan

The complexity or simplicity of a cost allocation plan depends on the type, size, and number of programs and activities of the tribe or native organization. The steps in preparing a cost allocation plan include:

- Identify the service and costs of each service to be allocated.
- Determine the method (unit) for allocating the costs of each service to user programs.
- Allocate costs to user programs mathematically.

The following supporting information would be a part of a cost allocation plan.

- List of grants, contracts and agreements.
- Agency organizational chart.
- Job description - for each general and administrative staff person.
- Work sheet for each individual showing personnel and non-personnel costs, chargeable hours and calculation of that employee's billing rate.
- Summary of non-personnel general administrative costs and allocation to each general and administrative position.
- Copy of the previous audit report supporting the total general and administrative costs used in these calculations.
- Copy of the time sheet form, which will be used by general and administrative staff.
- Copy of the monthly billings summary form that will be used to invoice each program.

- Space cost allocation for each property.

Indirect Costs

Indirect costs are those incurred for a common purpose benefiting more than one program and not readily assignable to the program specifically benefited. All indirect costs must be negotiated with a cognizant agency. The cognizant agency is the federal agency responsible for negotiating and approving indirect cost rates on behalf of all federal agencies.

An indirect cost rate is the rate between total indirect expenses of the agency and some direct cost base. This includes either direct salaries and wages or total direct costs exclusive of capital expenditures. The rules for indirect costs are delineated below:

- Indirect costs are shared costs, to be distributed by an indirect cost rate, which must be grouped into one or more equitable cost pools to determine appropriate rate(s);
- A formal indirect cost proposal must be submitted and approved. Once approval is granted, charges can then be distributed by means of an indirect cost rate;
- Application of indirect cost rates must be supported by formal accounting records available for auditing;
- Indirect costs (or administrative costs) are no different than direct costs in that they have to be allowable under the Federal government cost principles.

Types of indirect cost rates

- Predetermined rate - negotiated, usually for one year and not subject to adjustment.
- Fixed rate with carry forward - adjusted in future period.
- Final rate - not subject to adjustment.
- Provisional rate - temporarily subject to adjustment.

Cognizant Agency

The indirect cost rate must be negotiated with the appropriate agency. If negotiating with a federal agency then the various federal funding agencies have agreed among themselves that one of them will act as a representative of all of them in dealing with a given grantee. That agency will then become the cognizant agency for the grantee.

The cognizant agency approves a grantee organization's indirect cost rate proposal on behalf of all federal agencies. Once the cognizant agency approves the rate, it is also to be accepted by all the other agencies. However, the federal agencies are not required to accept the rate.

Allowability of Selected Costs

The charts on the following pages are a quick reference to specific items of cost and identify if the cost is allowable or allowable with approval of the grantor agency.

It is important to review the complete OMB A-87, A-122, or A-21 for specific costs. The OMB Circulars are available at:

http://www.whitehouse.gov/omb/rewrite/circulars/a087/a87_2004.html

http://www.whitehouse.gov/omb/circulars_a122_2004/

The chart identifies if the specific item of cost is addressed in OMB A-87 or OMB A-122 and if the cost is allowable, allowable with approval or not allowable.

EXAMPLE: Advisory Councils: Advisory Council costs are addressed in OMB A-87 and not in OMB A-122. The costs are allowed for Tribal Governments.

If a cost is not discussed in the circular that pertains to the ANA project please talk to the ANA program specialist or OGM grants specialist about the allowability of the cost.

OMB Cost Principles – Selected Items of Cost

Cost Category	A-87 State, Local and Tribal Governments	A-122 Nonprofit Organization	A-21 Educational Institutions	Allowable	Allowable With Approval	Not Allowable
Accounting	X			X		
Advertising – Read Allowability	X	X	X			
Advisory Council	X			X		
Alcoholic Beverages	X	X	X			X
Alumni Activities			X			X
Audit Services	X			X		
Automatic data processing	X				X	
Bad Debts	X	X	X			X
Bid and proposal costs (reserved)		X				
Bonding Costs	X	X		X		
Budgeting	X			X		
Building lease and management	X			X		
Civil Defense costs – Read Allowability			X			
Commencement and Convocation costs – Read Allowability			X			
Communication costs	X	X	X	X		
Compensation for personal services	X	X	X	X		
Contingency provisions	X	X	X			X
Contributions	X	X				X
Deans of Faculty/Graduate Schools			X	x		

Cost Category	A-87 State, Local and Tribal Governments	A-122 Nonprofit Organization	A-21 Educational Institutions	Allowable	Allowable With Approval	Not Allowable
Defense and Prosecution Read Allowability	X	X	X			
Depreciation of use allowance	X	X	X	X		
Disbursing services	X			X		
Donations		X	X			X
Employee morale, health and welfare costs and credits	X	X	X	X		
Entertainment costs	X	X	X			X
Equipment and other capital expenditures	X	X	X		X	
Executive Lobbying costs			X			X
Fines and penalties	X	X	X			
Fringe benefits	X	X	X	X		
General government expenses	X					X
Goods/services for personal use		X	X			X
Housing and personal living expenses		X	X			X
Lobbying	X	X	X			X
Idle facilities and idle capacity	X	X			X	
Independent research and development (reserved)		X				
Insurance and indemnification	X	X	X	X		

Cost Category	A-87 State, Local and Tribal Governments	A-122 Nonprofit Organization	A-21 Educational Institutions	Allowable	Allowable With Approval	Not Allowable
Interest, fund-raising, and investment management costs – read the regulations	X	X	X			X
Labor relations costs		X	X	X		
Legal expenses	X	X		X		
Losses on other awards	X	X	X			X
Maintenance and repair costs	X	X	X	X		
Materials and supplies	X	X	X	X		
Meetings, conferences	X	X		X		
Memberships, subscriptions and professional activity costs	X	X	X	X		
Motor pools	X			X		
Organization costs		X			X	
Overtime, extra pay, shift and multi-shift premiums	X	X		A-87	A-122	
Page charges in professional journals		X		X		
Participant support costs		X			X	
Patent costs		X	X	X		
Payroll preparation	X			X		
Pension plans	X	X		X		
Personnel administration	X			X		
Plant security costs		X		X		

Cost Category	A-87 State, Local and Tribal Governments	A-122 Nonprofit Organization	A-21 Educational Institutions	Allowable	Allowable With Approval	Not Allowable
Preagreement costs			X			X
Pre-award costs	X	X			X	
Professional costs	X	X	X	X		
Profit and losses on disposition of depreciable property or other capital assets	X	X	X	X		
Proposal costs	X		X		X	
Publication and printing costs	X	X		A-87	A-122	
Rearrangement and alteration costs	X	X	X		X	
Reconversion costs	X	X		X		
Recruiting costs – Read Allowability		X	X			
Relocation costs – subject to limitations		X		X		
Rental costs	X	X	X	X		
Royalties and other costs for use of patents and copyrights		X		X		
Scholarships and Student Aid costs			X	X		
Selling and Marketing			X			X
Severance pay	X	X	X	X		
Specialized service facilities		X	X	X		
Student Activity costs			X			X
Taxes	X	X	X	X		
Termination costs		X	X	X		

Cost Category	A-87 State, Local and Tribal Governments	A-122 Nonprofit Organization	A-21 Educational Institutions	Allowable	Allowable With Approval	Not Allowable
Training and education costs	X	X		X		
Transportation costs	X	X		X		
Travel costs	X	X	X	X		
Trustee Travel and Subsistence		X		X		
Under recovery	X					X

Section 5: Continuations and Grant Actions

Continuations

Approved multi-year grantees must submit a continuation application to ANA for the next year's funding through the grantsolutions.gov system.

1. Line item budget for Federal and Non-Federal Share (itemized by approved budget category).

Note: Revisions to line items are allowed during continuations as long as a budget justification narrative for the new line items is submitted.

2. Budget justification narrative
3. SF424, SF424A (signed by Authorized Official) and SF424B
4. The Following Certificates and Assurances signed by the Authorizing Official
 - Certification Regarding Maintenance of Effort
 - Certification Regarding Debarment, Suspension and Other Responsibility Matters
 - Certification Regarding Lobbying (for awards over \$100,000.00)
 - Certification regarding Environmental Tobacco Smoke (no signature required)
5. Current Indirect Cost Rate Agreement

Note: This should only be submitted only if requesting indirect cost

6. Program narrative covering project accomplishments to date, including the criteria used to measure and validate accomplishments, and any changes grantee is requesting be made to the continuation period.

Note: Applications may contain request for budget revisions or OWP revisions for the continuation year. Any revisions for continuation periods should be discussed with the program specialist prior to submitting the continuation application. Revisions and reasons for revisions should be identified in the program narrative. Supporting documentation for the requested revision should be included in the application.

Grant Actions

ANA understands that grantees may need to modify their budget or other aspects of the approved grant in order to accomplish the project OWP. There are some cases where written prior approval from ACF/ANA is required before the grantee can implement the modification. The instances where prior approval is required are referred to as a grant action. Grant actions may include budget modifications, a change in key personnel, a no cost extension, and a carry over budget. The HHS Grants Policy Statement, Exhibit 5 provides a summary of actions that require prior approval from ACF/ANA (ACF/ANA is the OPDIV). For more information, the HHS Grants Policy Statement is available at: <http://dhhs.gov/asfr/ogapa/grantinformation/hhsgps107.pdf>

Table 18: Summary of Actions Requiring OPDIV Prior Approval

OPDIV prior approval is required for	Under the following circumstances
Alterations and Renovations (A&R)	<p>Rebudgeting into A&R costs in a single budget period that would exceed the lesser of \$150,000 (or amount specified by the OPDIV in Part IV of the HHS GPS) or 25 percent of the total approved budget (direct and indirect costs) for a budget period (also see “Allowable Costs and Activities”).</p> <p>Any single A&R project exceeding \$150,000 (or amount specified by the OPDIV in Part IV of the HHS GPS).</p> <p>Aggregate costs that would exceed the lesser of \$150,000 (or amount specified by the OPDIV in Part IV of the HHS GPS) or 25 percent of the total costs reasonably expected to be awarded by the awarding office for a project period (or competitive segment under programs that entertain competing continuation applications).</p>
Carryover of unobligated balances	If not provided as an expanded authority. Also see “Carryover of Unobligated Balances” below for potential OPDIV actions if provided as an expanded authority.
Change of grantee organization	All instances. Recipients must notify the awarding office of other changes in organizational status. See “Change of Grantee Organization” below.
Change in scope	All instances. See “Change in Scope” below for a discussion of the post-award changes that may indicate a change in scope: transfer of substantive programmatic work to a third party; significant rebudgeting; incurrence of research patient care costs; purchase of a unit of general- or special-purpose equipment exceeding \$25,000.
Changes in status of PI, PD, or other key personnel named in the NoA	<p>For PIs/PDs, replacement; absence for any continuous period of 3 months or more; reduction of time devoted to project by 25 percent or more from level in approved application.</p> <p>For other key personnel, substitution for named personnel.</p> <p>See “Change in Status, including Absence, of PI/PD and Other Key Personnel” below.</p>

OPDIV prior approval is required for	Under the following circumstances
Construction, land, or building acquisition	All instances when purchase proposed; any proposal to convey, transfer, assign, mortgage, lease, or in any other manner encumber real property acquired with OPDIV grant funds.
Cost principles prior-approval requirements	All instances unless provided as an expanded authority (not available for construction, land, or building acquisition or indemnification of third parties).
Deviation from award terms and conditions	All instances. Includes undertaking any activities disapproved or restricted as a condition of the award.
Foreign component added to a grant to a domestic organization	All instances.
Indemnification of third parties	All instances.
Need for additional OPDIV funding	All instances whether or not additional time is needed, including extension of a final budget period of a project period with additional funds. See “Need for Additional OPDIV Funding” below.
No-cost extension	All instances unless authority to approve a one-time extension of up to 12 months without a change in scope is provided as an expanded authority. See “Need for Additional Time to Complete Project- or Program-Related Activities (‘No-Cost Extension’)” below.
Pre-award costs	All instances before the effective date of the initial budget period of a new or competing continuation award unless the authority to approve pre-award costs up to (and including) 90 days before the beginning date is provided as an expanded authority. In either case, the costs are incurred at the applicant’s/recipient’s own risk.
Research patient care costs	For States, local governments, and tribal governments, all instances. For institutions of higher education, non-profit organizations, and commercial organizations, any instance in which such costs were not part of the approved budget shown in the NoA or a recipient wants to rebudget out of the approved research patient care category.
Retention of research grant funds when career award made	All instances.

OPDIV prior approval is required for	Under the following circumstances
Transfer of amounts for training allowances (stipends, tuition, and fees) to other budget categories	All instances unless provided as an expanded authority to States, local governments, or tribal governments. (The training allowance does not include trainee travel, which HHS does not consider to be a trainee cost, and other training-related expenses.)
Transfer of funds between construction and nonconstruction work	All instances.
Transfer of substantive programmatic work	All instances if the recipient is a governmental entity or, for recipients subject to 45 CFR part 74, the grant is a construction grant; otherwise considered an indicator of change in scope. See "Transfer of Substantive Programmatic Work" below.

Prior to submitting any grant actions, or for questions on a change in scope or supplement, grantees should speak with their ANA program specialist. For additional reference, guidance on when and how to submit a formal request for budget modifications, carry over budgets and no cost extensions is below.

Budget Modifications

In general, grantees are allowed a certain degree of latitude to rebudget within and between budget categories to meet unanticipated needs and to make other types of post-award changes. These budget modifications are allowed provided they are for activities detailed in the approved OWP for that budget period and do not meet one or more of the below prior approval requirements.

The 45 CFR Part 74.25 and 45 CFR Part 92.30 states that written approval is required from ACF/ANA prior to grantees implementing a budget modification that does one or more of the following:

- Changes the scope of the project. For ANA’s purposes, a change in scope may result from a significant alteration of the approved project activities, change in the direction of the project, the type of services delivered, the number of beneficiaries to be served, or training provided.
- Adds new line items that fall under the prior approval cost principals according to the OMB Circulars. For federally recognized tribes the relevant circular is OMB Circular 87 and for native non-profits the relevant circular is OMB Circular 122.
- Results in a need for additional federal funding
- Moves funds from direct costs to indirect costs and vice versa.

- Involves the transfer of funds allotted for training allowances (this is a direct payment to trainees) to other budget categories.

Please ensure your ANA program specialist has a copy of your current working budget. For further guidance and information, please contact your OGM grant specialist and ANA program specialist.

For requests requiring written prior approval, grantees must submit:

1. A letter written on letterhead and signed by the authorizing representative. The letter should request the budget revision and explain the reasons for the change.
2. A revised 424A with the new budget category amounts.
3. A revised line item budget showing the approved budget, what is requested to be revised, and the new amounts.
4. A new line item budget narrative that inserts the revised amounts and justifications into the approved budget narrative.
5. Any additional information the grantee believes is relevant to the request (e.g., price quotations).
6. Current indirect cost rate agreement if the budget is changed due to an increase or decrease in indirect costs.

Note: *Modifications to the non-federal share budget should be sent to OGM and the ANA program specialist and require a new line item budget and budget narrative for non-federal share only. Revisions to the non-federal share do not require prior approval provided the revisions abide by the OMB cost principles.*

Submit your request in grantsolutions. Refer to the Grantsolutions Grantee Manual for detailed instructions.

Carry Over Budget

Grantees with multi-year grants may request a carry over budget (COB) from one year to the next if the funds are for project activities that were not accomplished during the previous budget period. Prior to submitting a request, the grantee must ensure that the amount requested for the COB is still in their payment management account and that they are current in their financial and programmatic reporting. If unsure, they should contact their OGM grants management specialist.

To submit a carry over budget, grantees should provide the following to their ANA program specialist and OGM grants management specialist through grantsolutions:

1. A letter signed by the authorizing official requesting the COB. Ensure the amount of the request is clearly identified in the official request letter and that it includes the following:
 - A detailed description of approved grant activities from the prior budget period that were not completed.

- An explanation of why established activities were not completed.
 - A plan for completing these activities in the current budget period.
2. A detailed budget with the amount and title of each line item that has unobligated funds.
 3. A budget narrative that explains how the grantee proposes to use these funds in the current budget period.

Note: *Unobligated balances of funds cannot be carried forward into the next budget period to perform new objectives or activities.*

4. SF-424 stating only the COB request amount and proportionate 20% applicant match (non-federal share). The 20% match should be included on the 424 even if it was met in the previous budget period.

Note: *If the match was met during the previous budget period, the budget narrative should state that the match was met in the previous budget period with reference to the 425. This statement can also be included in the request letter. Upon receiving the NGA, the grantee should ensure that the NGA also includes a statement that the match has been met.*

5. SF-424A which breaks down the COB. The 424A should include the actual amount of any match dollars that are being carried over.
6. An updated SF-425 long form that shows the unobligated balance is equal to the amount that is being requested. Example: submit the last quarter SF 425 (4th quarter).

Note: *The COB will not be processed if the SF-425 amounts do not align with the reports from the SF-425.*

7. A revised OWP that includes incomplete activities from the previous budget period with new timeframes for completion of those activities and benchmarks.

Submit your request in grantsolutions. Refer to the Grantsolutions grantee manual for detailed instructions.

No Cost Extension

ANA awards funding to a grantee with the intention that all objectives will be completed within the approved time frame; therefore requests for a no cost extension (NCE) must be strongly justified by the grantee in order to be approved. If grantees are behind on project activities and spending, ANA can provide technical assistance during the project period that can help grantees overcome project challenges that are causing the delays. In exceptional cases, ANA can approve a NCE to allow grantees extra time to successfully complete the project objectives. Prior to submitting a request for a NCE, grantees must speak with their

ANA program specialist. A NCE request based solely on there being unobligated balances remaining at the end of the project period will not be approved. If the NCE is justified and allowable, the grantee should submit the request as early as possible.

The grantee should provide the following:

1. A letter signed by the authorizing official requesting the NCE at no cost to ANA and identifying the length of the NCE and the new project period end date.
2. The request letter should address the following questions:
 - Why is the extension needed?
 - What objectives were not completed?
 - How do they plan to complete the incomplete activities?
 - Will they be using un-obligated funds from the budget period in the NCE period? If so, how much?
3. An OWP which reflects the activities to be accomplished during the NCE. The OWP should include an additional column with the heading *status*. The status column should state either that the activity is completed or state the percentage of the activity that is completed and the expected completion date (assuming the NCE is approved). This must be done for the entire project period.

Change in Key Personnel

If any of the key staff identified in the Notice of Award changes during the course of the project period, then grantees must notify their ANA program specialist. A change in key staff, such as the project director, will require a grant action. Written prior approval must be secured from ANA if key personnel will be absent for more than 25% of the project implementation period or more than three months.

The grantee should provide the following through grantsolutions to request the change:

1. The request for approval must be on letterhead and signed by the Authorized Official. If the authorizing official has changed from what is noted on the NGA, the grantee should submit a resolution or some official documentation showing the change.
2. A resume of the new project director must be included.

Submit your request in grantsolutions. Refer to the Grantsolutions grantee manual for detailed instructions.

Section Six: Preparing for the Impact Visit

The purpose of the visit is to assess the impact of ANA funding, increase ANA knowledge about successes and challenges of ANA projects, and to share stories of ANA projects with fellow native communities, Congress and the American public. The impact visit serves as an opportunity for the grantee to explain how the project resulted in measurable reduction to, or elimination of, the problems and needs described in the original application. Prior to the impact visit, an ANA impact evaluator will contact the grantee. The visits generally occur between the last three months of a project to the three months after project completion of the project.

Impact Visit Outline

An outline of the impact visit, including recommended tracking templates, is below:

1. Objective Work Plan

Be prepared to discuss the OWP and the methods used to monitor/track the achievement of the ANA project objectives.

- Review the OWP to determine the status of project objectives.
- Provide information on the extent to which the results and benefits expected from project implementation have been realized. Please have any deliverables available for verification.

2. Project Impact

ANA will gather information on the impact of project activities.

- Be prepared to discuss the extent to which the project addressed the original statement of need/problem statement (from the application). Please have any deliverables available for verification.
- Discuss planned versus actual results in the area of impact indicators: partnerships developed, resources leveraged and grantee-identified indicators.
- Input from project beneficiaries on the impact and effectiveness of the project.

3. Community Involvement and Outreach

ANA wants to hear about the project proposal development process.

- How the problems or needs to be addressed by the project were defined.
- How the project strategy was developed. Groups involved in the development process.
- Review of any marketing or outreach materials developed for the project.
- Activities and events held to involve the community in project development and implementation.
- The number of elders and youth involved in the project.

4. Project Challenges

ANA will gather information on the challenges encountered during project planning and implementation.

5. Staffing

ANA will learn about staff and consultants hired to work on the project.

- Identify staff and consultants who worked on the project.
- Determine if budgeted staff was hired within the timeframe outlined in the OWP.
- Determine if the planned staffing pattern was adequate to meet project requirements.

6. Project Results and Benefits

ANA will gather information on the results and benefits of project activities.

- Income generated through the project. This area will include a discussion of any activities that generated income and the amount generated to date. Please have documentation available for review.
- Businesses, if any, created through the project.
- Increased capacity or self-sufficiency gained through training. This area will include course/workshop titles, hours needed to successfully complete the training, and the number of people successfully completing training.
- How the project and its benefits will be sustained after the conclusion of ANA funding.

7. Financial

ANA will discuss the following:

- Non-federal share tracking
- Any remaining funds from the project
- Any budget modifications

8. Project Snapshot

ANA will ask questions specific to the project area: SEDS, Language or Environmental. The following table provides a worksheet for project staff to collect relevant quantitative data prior to the impact team's visit. When applicable, please be prepared to provide supporting documentation.

#.....	Jobs created as a direct result of this project (paid with ANA dollars)
#.....	Jobs created through project revenue/resources generated as a result of this project (not paid with ANA dollars)
#.....	Businesses created as a result of this project
#.....	Native American consultants hired to work on this project
#.....	Elders involved in this project
#.....	Youth involved in this project
\$.....	Program/project revenue generated by this project
\$.....	Resources leveraged by this project
#.....	Individuals trained as a result of this project
#.....	Partnerships formed as a result of this project
#.....	Governance codes/ordinances developed
#.....	Governance codes/ordinances implemented
#.....	Language surveys developed
#.....	Number of people who completed language surveys
#.....	Language teachers trained
#.....	Native language classes held
#.....	Youth (0-18) who increased their ability to speak a native language
#.....	Adults (18+) who increased their ability to speak a native language
#.....	People achieving fluency in a native language
#.....	Environmental codes/regulations/ordinances developed
#.....	Environmental codes/regulations/ordinances enforced

9. ANA Services

ANA hopes grantees will share any suggestions, concerns or comments that will help ANA better serve its applicants and grantees.

Partnerships:

How to record partnerships:

In the first column on the table below, record the names of the project’s partnerships. Then check one of the boxes (“Pre-existing partnership” or “New partnership”) to clarify if the partnership was strengthened or newly formed during the course of the project. In the final column, provide a brief description of how the partnership contributed to achieving the project goal and objectives.

What partnerships were formed or strengthened in the implementation stage of this project?

I.D.	Partner's Name	Pre-existing Partnership	New Partnership	Brief description of how the partnership contributed to meeting the project goal and objectives
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	
4.		<input type="checkbox"/>	<input type="checkbox"/>	
5.		<input type="checkbox"/>	<input type="checkbox"/>	
6.		<input type="checkbox"/>	<input type="checkbox"/>	
7.		<input type="checkbox"/>	<input type="checkbox"/>	
8.		<input type="checkbox"/>	<input type="checkbox"/>	
9.		<input type="checkbox"/>	<input type="checkbox"/>	
10.		<input type="checkbox"/>	<input type="checkbox"/>	

Leveraged Resources

How to record leveraged resources:

In the table below, record the source of the leveraged resource and whether the resource was from federal or non-federal funds. At the bottom of the table, list the total leveraged resources from federal and non-federal resources. In the final column, provide a brief description of how the resource leveraged contributed to meeting the project goal and objectives. The leveraged resource must be directly related to the ANA-funded project.

Source	Amount of Federal (\$)	Amount of Non-Federal (\$)	Brief description of how the resource leveraged contributed to meeting the project goal and objectives
Total Leveraged Resources:			

Full-Time Job Equivalents (FTEs) Created

ANA Definition:

Any non-consultant position paid for through ANA grant funding, non-federal resources or leveraged resources. ANA only includes positions directly related to the project, its goal(s) and objectives.

What to record:

ANA collects data on three types of jobs created: those that existed in some form *prior* to the project's implementation and will continue work on the project (e.g. program manager working .20 FTEs for the ANA project); those created (started) *during* the project; and those that exist at the end of a project, and *will continue*, but did not exist during the majority of project implementation (e.g. a business created by the project creates three new permanent, fulltime positions just at the project end).

Please provide details of all positions that were funded by this project:

Table 19: Project positions

I.D.	Position Title	Estimated Hours per Week	Estimated # of Weeks	Estimated Total (hours per week x # of weeks)
1.				
2.				
3.				
4.				

Total FTEs Created:

Total People Employed:

Table 20: Consultant and stipend positions

I.D.	Position Title	Estimated Hours per Week	Estimated # of Weeks	Estimated Total (hours per week x # of weeks)
1.				
2.				
3.				
4.				

Total FTEs Created:

Total People Employed:

Table 21: other positions created through the project

I.D.	Position Title	Estimated Hours per Week	Estimated # of Weeks	Estimated Total (hours per week x # of weeks)
1.				
2.				
3.				
4.				

Total FTEs Created:

Total People Employed:

Training

ANA Definition:

A session, seminar, class, or similar learning activity facilitating the acquisition of practical, job-specific knowledge, skills, and abilities. To be considered a training, the session should facilitate learning geared towards advancing project goals and/or build organizational capacity to sustain project results and benefits.

How to record trainings:

Record project-funded trainings (funded or supported through ANA dollars, non-federal share, or leveraged resources) conducted or attended by individuals involved in the ANA funded project utilizing the table below. Do not include attendance at ANA's mandatory post-award training or other ANA-mandated trainings or attendance at informational conferences or workshops.

Please list the courses and workshops completed, the number of hours needed to complete each, the number of people trained in each, and the number of new people trained in each workshop.

Name of course or workshop	# hours to complete training	# of people trained	# of new people trained (please exclude those trained in prior workshops)
Total (unduplicated) number of people trained:			

Project Data

What data will be collected	Who Will Collect It and How	How Frequently	How Will It be Analyzed	How Will It be Reported
<ul style="list-style-type: none"> Number of participants in the program. 	<p>The Project Manager will do an intake on each participant, establish individual participant files and enter information into an excel database.</p>	<p>Daily – Month 2 through 18</p>	<p>The unduplicated client count, participation by individual, retention and demographics will be analyzed. Also individuals that drop out of the classes will be interviewed and reasons for leaving project will be analyzed.</p>	<p>The information will be reported to the Board of Directors, Community, and Community College.</p>

Activity: Preparing For an Impact Evaluation

List the standardized areas that apply to your ANA project and the appropriate documents and records that you will have available for the impact evaluation team.

I.D.	Standardized Areas
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	

Describe the systems that you have developed to collect data to demonstrate project impact.

I.D.	System Description
1	
2	
3	

Conclusion

Congratulations on your ANA grant. We hope the information in this manual is helpful in the management and reporting of your ANA project. ANA has a variety of resources available to help you during the course of your project.

ANA believes community members are at the heart of lasting and positive change and community involvement is central to designing and implementing a successful project. The ANA website includes success stories, a growing resource library, and guides for new grantees. Please review the ANA website at <http://www.acf.hhs.gov/programs/ana>

ANA also has regional training and technical assistance centers. These centers are staff by training and technical assistance (TTA) providers with extensive experience managing and implementing community development projects. Contact information for the centers is on the ANA website.

Good luck on your new project and let your program specialist or TTA provider know if you have any questions.

Appendix 1: Successful Project Strategies

ANA seeks to fund community development projects that reflect the cultural values, collective vision, and long-range development goals of native communities. ANA supports this approach because community involvement in both the planning and implementation phases is a key factor in achieving project success. In addition to strong community involvement in the planning and implementation of a project, successful projects share many common characteristics. During impact visits, grantees are provided an opportunity to share with ANA the best practices learned during the implementation of their project. No categories or lists are provided by ANA, rather grantees simply give open comments on what useful information and effective techniques were utilized that may be of use to other grantees implementing similar types of projects. The seven most frequent best practice suggestions from grantees are:

- Form Partnerships and Collaborations;
- Ensure Community Support Throughout;
- Market / Share Project Successes with Community;
- Project Activities Should Be Culturally Appropriate;
- Project / Staff Flexibility is Key;
- Hire Motivated and Competent Staff; and
- Have Organized / Standardized Record-keeping

All projects encounter challenges. During the impact visits, grantees are asked to list and discuss the challenges encountered during implementation. The eleven most common challenges reported by the grantees are:

- Staff turnover;
- Late start;
- Overambitious project scope;
- Geographic isolation and travel related issues;
- Lack of expertise;
- Challenges with ANA processes;
- Underestimated project cost;
- Underestimated personnel needs;
- Partnership fell through;
- Lack of community support during implementation; and
- Hiring delays

To expand the best practices and challenges noted above, quotes from ANA grantees regarding their best practices and challenges are below, broken down by project stage and then by program area. The following information is not necessarily the views of ANA, but grantee-provided information.

Grantee's Best Practices by Project Stage

Project Design and Development

Proposal Writing

- Write your own grant with assistance from people who know your community well.
- When writing the grant, include the financial people as well!
- Have a clear idea of what you want to accomplish

Proposal Planning

- Rely on the community for not only getting the project ideas, but developing the project idea - they're the best source for understanding what you want to get done and will lead to long-term sustainability of your project.
- Work with the community to identify the project need - then you won't have to deal with lack of volunteer commitment or community involvement during implementation.
- Conduct extensive and detailed planning/research in the development of your project.
- Ensure that there is a need for the project in the community.
- Ensure that there are committed individuals in community to assist you in project implementation.
- Find the right partners by doing research before your project begins.
- Involve stakeholders in the project design.
- Focus your project on a specific target population.
- Understand the skill sets of your current staff.
- Incorporate participant assets into the project design.
- Have a clear and realistic understanding of your budget and cost estimates prior to submitting the application. Request enough funds to successfully accomplish your project. If you are awarded less, work with ANA staff to reduce the number of project activities and objectives to fit the new budget
- Project must be designed to be flexible and adaptable to partner needs.
- Ensure there is community involvement in your grant and follow their lead. Let them guide your project, which will mean that it is in line with what the community wants and needs.
- Make sure adequate hardware and software to implement the project proposal is available.
- If utilizing curriculum in your project, plan to use a culturally relevant curriculum and teaching method that respects and understands the differences in Indian communities.
- Identify potential staff prior to submitting your application.
- Conduct research prior to proposal submission to ensure all contingencies are covered and all project components are in place.

Proposal Scope

- Take care to create an OWP with realistic and achievable goals.
- Keep your objectives manageable and focused.
- Don't overestimate what you can achieve to look good in the application
- Don't pack too much into one year

Project Management

Partners

- Use resources from other tribes.
- Build partnerships early and learn the key players. Know who to invite to the process.
- Partner and collaborate with programs of a similar mission to learn best practices.
- Be willing to share your deliverables.
- Find resources that are already established and tap into them as much as possible.
- Manage partner relationships well and with care: you should recognize partners with letters and cards. You should go to lunch with them and visit them. Talk to them when you don't even want anything from them!

Staffing

- Work with/Hire a dedicated and motivated staff that will not waver in their commitment to the project goal.
- Find a project director that is dedicated to the administrative side of project implementation (i.e. time cards, scheduling, logistics, meetings, etc) rather than only being focused on the programmatic side.
- In order to deal with staff turnover, make sure that all staff provides materials and training for transition so that if someone leaves, the new person will be prepared.
- Ensure stable staffing pattern by hiring qualified, passionate and culturally knowledgeable personnel.
- To ensure project activities are accomplished, write them into the responsible staff person's annual performance plan.

Community Support/Involvement

- Ensure you have community support, especially if you are a small tribe.
- Ensure you have face time with people, not just emails and phone calls.
- Create an atmosphere of communication and collaboration by including the community in the implementation process.
- Pursue outreach activities, such as informational community meetings.
- Conduct a preliminary survey in the community where you will implement the project to ensure there is not opposition.

Market your project at social events like powwows.

- Provide incentives for project involvement and participation: gift certificates, hotel nights, free daycare for project events, etc.
- Maintain humility in conversations with community members and continue to strive to serve the community rather than impose ideas upon the community.

Administrative

- Review the OWP as much as possible during the project.
- The best idea is to follow the goals and objectives of the project and work hard to accomplish the OWP.
- Have a caring attitude toward your grant; be committed to the project.
- Realize that everything is a step-by-step process.
- Find ways of overcoming any obstacles. They will happen, so expect them.
- Make sure infrastructure is in place before undertaking your project.
- Take tribal elections into account and do not plan a project during an election year.
- Use tools for strategic planning that is accessible and understandable to staff, such as Gantt Charts.
- Manage volunteers as if they were paid staff (i.e. be organized with their schedules and planning their daily activities – make sure everyone stays busy). Be respectful of volunteers' time.
- Be flexible and adaptable as an agency; be able to reinvent yourself quickly.
- Work with your funding source (i.e. ANA) in a proactive manner.
- Record keeping and project documentation are very important.
- Be proactive in your project's evaluation.
- Form a spirit of cooperation. Don't hoard project work. Share and be inclusive. Sharing is a sign of strength.
- Be sustained by the nobility of the purpose.
- Treat elders as experts, and allow them their say to set the path for project implementation.
- Trainings should be adapted to suit native people's needs and should be culturally relevant.
- Be open to criticism to make your project better.
- Know your community and how it works.
- Focus on one thing, don't spread yourself too thin.
- Outreach through the media.
- Have a project staff communication plan in place and follow it.
- Record the progress and achievements of your project in a well-designed monograph. It will help you to educate others about your work and will serve as a marketing tool for future efforts.

- Develop an interactive website to share ideas.

Financial Management

- Track all financial activities and keep financial documents (i.e. leveraged resources and NFS) well-organized
- Be as clear as possible at the outset of the project regarding the definitions of supplies and equipment
- Keep track of your Non-Federal Share (NFS) on a monthly basis
- When directly related to project activities, food is an allowable cost. Use it! (Note to grantees: Be sure to read HHS policy on when food is an allowable cost. Food costs are subject to a series of conditions.)
- Compact all contracting and subcontracting into one general contract, then let the contractor handle the details for each of the subcontracting jobs. This should save time and headaches.

Marketing Best Practices

During impact visits in 2008, ANA's Department of Policy, Planning, and Evaluation (DPPE) began gathering information on each grantee's three best marketing practices, ranked in order. DPPE looked at the type of marketing strategy used by each grantee and compared them to whether the grantee reported challenges with community support during implementation.

- The top three marketing strategies for all projects that received impact visits are essentially the same:
- newspapers
- flier/brochures
- word of mouth

Grantee's Best Practices by ANA Program Area

Social and Economic Development Strategies (SEDS)

Social Development

- Cultural Preservation
- Promote and celebrate the elders to make them proud. Be sure to thank and recognize everyone who participated
- Develop a monthly newsletter to notify the public regarding the project
- Have people with a clear understanding of tribal history and traditions take the lead on the project
- Market your project to increase participation
- Procure community feedback on project progress and respond to it.

- Determine staff responsibilities and develop an organizational chart.
- Educate your staff and involve them in grant proposal writing.
- Delegate responsibilities and get volunteers involved.
- Youth Development
- Use structures from other programs, such as the Boys and Girls Clubs; don't reinvent the wheel.
- Design school programs to be flexible and adaptable.
- Ensure there is community involvement in your grant and follow. their lead. Let them guide your project, which will mean that it is in line with what the community wants and needs.
- Encourage collaboration between tribal departments.
- Make use of strong adult advisors.
- Get refreshments, through donations, if possible.
- Record the process and achievements of your project in a well-designed monograph. It will help you to educate others about your work and will serve as a marketing tool for future efforts.
- Ensure that there is a place in the community for youth to meet.
- Maintain consistent communication with parents to keep them involved with their children. Form a bond of trust with the families of those involved in the program. Keep them involved and cognizant of program activities.
- Education Development
- Know your community and how it works.
- Give credit where credit is due.
- Conduct outreach through the media
- Provide Computer access and learning skills on a full-time basis
- Work with partners.
- The living classroom is a great idea and should be found everywhere.
- Rely on the community for not only getting the project ideas, but developing the project idea - they're the best source for understanding what you want to get done and will lead to long-term sustainability. Work together to identify the need - then you won't have to deal with lack of volunteer commitment or community involvement.
- Work with community partners to strengthen the student support network and broaden the impact.

Economic Development

- Business Development
- Be wary of working with multiple communities.
- Know your project well.
- Ensure good customer service.

- Be a person; don't be focused on the money.
- Have a long-term vision.
- Work with people who have real life business experience (i.e. they have owned their own business); they will already know many important business lessons that you can avoid learning the hard way.
- Network within the industry you're working in (i.e. fishing, technology).
- Work on the entrepreneurial level with partners, rather than government to government.
- Giving one-on-one technical assistance is more effective than technical assistance in a classroom setting.
- Hire someone with expertise in the business development field. Collaborate with partner who has done a similar project and base your project off of that.
- Design the project to keep the local money in the area and reach out to expertise available on the local reservation. Switch from debt financing to investment financing.
- Understand all the contracts and conditions.
- Develop an Advisory Council to keep partners and contractors on task.
- General Small Business Recommendations:
- Most businesses are seasonal and must diversify to stay afloat.
- Businesses need up-to-date marketing information to stay competitive.
- Tourism activities must be market-driven and carefully priced.
- For marketing: rely on strong social ties and word of mouth.
- There is a general need for small businessperson hospitality training.
- Partnerships with off-reservation businesses help expand marketing opportunities, potentially increasing income for reservation-based small-business owners.
- Don't duplicate services already available. Partner with them and fill a noticeable gap in services.
- Agricultural Recommendations:
- Don't spend too much money buying ready-made greenhouses. You can make a greenhouse cheaply with PVC piping and tarps
- Staffing: select staff that already knows commerce, is familiar with the key lending institutions, knows Small Business Administration (SBA) groups; knows the banks and private foundations and has social and tribal connections
- If your organization provides trainings:
- Track the trainings you give efficiently enough to put the data into a useful database later.
- It is important for Native Americans to teach culturally-focused business curriculum.
- Projects to set up real estate agency:
- Make sure you have a real estate broker before implementing the project.

- Start financial literacy early with the youth. They will keep the lessons with them and learn to become self-sufficient.
- Keep it simple. Don't get elaborate.
- Focus on one thing, don't spread yourself too thin.
- Organizational Capacity Building
- Collaboration between different organizations reduces competition for future grant money as all can submit one proposal.
- Charge fees to avoid training "no-shows". Charging a nominal fee to register for trainings will encourage participant attendance.
- Use native trainers whenever possible
- Use local consultants for local work
- Build the capacity of your project partners throughout your project
- Boys and Girls Club of America has a guide with steps to follow for success.
- Find resources that are already established and tap into them as much as possible. Share your experiences and documentation to ensure an ongoing partnership.
- Develop an interactive website to share ideas.
- Develop an internship program or find existing organizations to work with underserved communities.
- Enhance transparency to ensure credibility
- Use elders as a resource for teaching, and never compromise their trust.
- Electronic database systems (and IT in general) are underused by tribes: planning and developing a good system to warehouse project data is important.
- Visit with other tribes to learn their best practices.
- Community Strategic Planning
- Make sure you have a good rapport with your tribal business committee throughout the life of the project.
- The Army Corps of Engineers is a good source for design and engineering assistance.
- Train community members to be your experts so you don't have to rely on (and pay) outside consultants once the project ends.
- Create an atmosphere of communication and collaboration by including the community in the implementation process.
- Maintain humility in conversations with community members and continue to strive to serve the community rather than impose ideas upon the community.
- Job Training
- Job training sessions should focus on serving all types of customers, but the training delivery should be culturally appropriate for native people.
- Always track the project's progress.
- Celebrate successes!

- Develop partnerships with fellow service providers.
- Be willing to partner with non-native agencies in order to broaden scope of support services.
- Market your program by going to community meetings.
- Don't forget to emphasize "soft skills."
- Emergency Response Activities
- Hire qualified staff.
- Form necessary partnerships prior to proposal submission.
- Attend ANA post-award training.
- Conduct research prior to proposal submission to ensure all contingencies are covered and all project components are in place.

Governance

- Tribal Courts
- Ensure tribal support and stable leadership.
- Identify and collaborate with key partners in similar service area. Follow-up on the collaboration by positioning your entity as a critical player within your service area. Capitalize upon the services, knowledge and skills that your staff possesses and no other entity does.
- Develop your own capacity to eliminate the need to rely on others for assistance.
- Codes and Ordinances
- Don't reinvent the wheel.
- Be creative to make legal issues more entertaining / accessible for participants. Use cartoons, stories, jokes, etc.
- Don't send out too much written material at a time to your committee members (they won't read it). Send out summaries instead, so they can focus on the main points of your upcoming meetings.
- If you are a lawyer or legal expert, be honest with code committee members when you don't know something – don't pretend you know everything.
- Information Management
- Thoroughly understand your business and technological requirements prior to submitting an application.
- Understand your staff's technical skill sets.
- Hire a good technical project manager, rather than a manager with limited technical knowledge.
- You can get your tribal council to agree to IT projects if you use layman's terms, and explain pros and cons, and future benefits.
- Tribal Government Program Enhancement

- Trainings should be adapted to suit native people's needs and should be culturally relevant.
- Include the financial staff in project planning.

Family Preservation

- Strengthening Family Relationship Skills
- Don't create programs that isolate family members from one another. Design your activities to keep families together.
- Create programs around parents' time schedules. This reduces logistical challenges (i.e. parents finding baby-sitters when they have to attend an activity) and engenders positive family relationships.
- Don't "bribe" parents by giving them gifts to ensure their involvement. That is a short-term solution and is not sustainable for the program.
- Organizations that work with domestic violence issues:
- Enforce an abstinence policy (drug and alcohol use) with staff to engender trust from the community.
- Confidentiality is paramount.
- Use native culture and language in treatments because it helps clients reclaim their identity.
- Collaborate with other area service providers that complement the services you provide.
- Demonstrate how your portfolio of services fills a need in the community and shore up support from partners.
- Seek out personnel who have a passion for service work and have a history of devotion and experience in their field.
- The project trainings were included in the tribal incentives program for the first two project years, which formed a guaranteed audience.
- Train staff in case management skills.
- Provide cultural training for non-native staff.
- Leverage any available resources in your area to complement the pool of available family services.
- Provide incentives to project participants.
- Evaluate workshops and make adjustments based on the feedback.
- Utilize videoconferencing and Skype to overcome distances and to stay connected.
- Be sure to put aside some time to allow for trust to be built with the target communities.
- Offering childcare for participants really helped - otherwise they wouldn't have been able to attend classes.
- Manage partner relationships well and with care: you should recognize partners with letters and cards. You should go to lunch with them, visit them. Talk to them when you don't even want anything from them!
- Be inclusive - include all ages in the workshops.

- Hire qualified, passionate staff.
- Incorporate traditional native practices into the program. Native youth and couples respond well to a program geared specifically towards them.
- Family Violence Prevention
- Incorporate cultural traditions into a treatment program.
- Concentrate on increasing the health of a community. Don't be discouraged by a lack of immediate results. These types of programs are a long-term solution.
- Foster Parenting
- Have procedures in a manual to improve quality and continuity of your foster parent training program.
- Must have a strong parenting behavioral program that is culturally appropriate.
- Have good incentives for foster parents (general level of remuneration and small money gifts).
- Hold trainings at casinos because they are nice places for foster parents to meet.
- Use evidence-based training programs (those with research supporting them) and tailor them to meet your cultural concepts.
- Have strict requirements for foster parent qualifications.
- Parenting program needs to focus on skill development – hands on (practices and role playing): focus on doing rather than studying.
- Curriculum Development
- Bring traditional teachings into modern life.

Language

Assessment

- Data Collection
- Dialogue with the community is imperative
- Use food and personal invitations to bring people to meetings
- Utilize a community hiring process. Conduct meetings to inform the community about the project and the hiring process. Create a hiring committee similar to a jury, with enough members that committee members with close relations to a specific applicant can step aside during his/her interview process. Thus, a relative or friend will not interview each interviewee. This may help mitigate negative political fallout from hiring decisions.
- If you are using an incentive program to promote survey responses, involve the community in the process to decide the design of the incentive program. Hold community meetings to decide and take live surveys at the meetings. Then tally the results immediately at the meeting and discuss concerns about the decisions reached. This may help mitigate negative political fallout from the incentive program

- Set immersion as the overall goal and make your survey and community education components in relation to that goal. Then help educate the community on the benefits of immersion education.
- Make conflict prevention the precursor to your implementation decisions.
- If your tribe has adult speakers, encourage them to speak with tribal youth.
- Work with educators to get them to believe in and support your language program.
- Surveys:
 - Make them simple & easy to understand.
 - Make them short: you will have better luck getting full responses if your survey is as short as possible.
 - Call the survey recipients to double-check they received the survey. This can add a personal touch to the survey. process. This is best for small pools of survey recipients
 - Develop standard protocols for the survey (i.e. how to ask questions, how to compile and analyze the data).
 - Have an outside agency compile data to avoid political fallout (if the survey's results could potentially lead to negative backlash).
 - Plan to distribute surveys at large community events.

Planning

- Digitize Materials
- Use a method that you are already familiar with so did not have to reinvent the wheel.
- Recommend that any tribe looking to do a project involving recording and other means of language preservation look into the newest technology; this will make their lives easier.
- When working with elders, don't meet one-on-one; meet as a group of five or more to make them feel at ease. Then ask simple prompting questions and let them go into a discussion as a group while you listen.
- Don't guide the elders; let them guide you (in your research).
- Use Notebook software for language CD creation.
- Use technology formats that will support longevity of language resources.
- Use a formal archival standard to ensure long-term use and to overcome future staff turnover.
- Pilot test with community members who will provide critical feedback.
- Make backup copies!
- Digital storytelling is a powerful medium, it's more direct (a person is telling the story), so the message hits the audience differently than a simple video recording. Digital storytelling creates both oral and audio products. - use freeware to keep things affordable.
- Develop Printed Materials

- Re-teach things that young people do not know, no matter what field you are in.
- Teach cultural history along with the language.
- Host activities to draw in the community.
- Having an Advisory Committee was very helpful; they provided assurance for the community that the activities were performed in appropriate way.
- Use the curriculum for other projects.
- For tribes stuck in the “written language” question (i.e. should you write down your traditionally oral language): you need to become unstuck and start working to preserve your language before it is completely lost.
- Use the “Understanding by Design” curriculum framework by Wiggins and McTighe for language curriculum development because it uses effective communication strategies.
- Train Language Teachers
- Teach the younger and older generation to know what the language and culture is about.
- Use traditional meals to draw people in.
- Work with people and staff. Make sure your supervisor listens to you.
- Total Physical Response (TPR) curriculum helps learners avoid translating while they learn.
- Create a standardized curriculum for every grade possible and make sure each new level builds on the level below it.
- Ensure that the language teachers learn about the culture as well.
- Since we had very few fluent speakers left, we used fluent speakers of a sister language to train us. This unique approach to language learning allowed participants to re-discover our language.
- Master-Apprentice training works well to grow speakers, but also be sure to get them into the classroom to strengthen teaching skills.
- Use of TPR as a beginning language methodology.

Implementation

- Establish Intergenerational Program.
- Fluent speakers can become certified teachers, but non-fluent certified teachers rarely can be made into fluent speakers. Therefore, get your fluent speakers certified instead of vice versa!
- Emphasize person-to-person transmission of language skills.
- Use multi-media to support master/apprentice pairs.
- Have more than one master per team.
- Have a regional language advisory committee for the program.
- Share best practices with other tribes.
- Utilize Total Physical Response (TPR) methodology.

- Identify potential staff prior to submitting application.

Environment

Environmental Assessment

- Use a GIS system to manage spatial data. Tie a database in with a spatial component.
- If using GIS, it is very important that the staff take a GIS training.
- Could not get information from the EPA, so went to other tribes instead. (If you can't get info from one source, find another.)
- In order to deal with staff turnover, make sure that all staff are provided materials and trained for transition so that if someone leaves, the new person will be prepared.
- Consult the community first before implementing anything. Leave any preconceived notion of how you think things should be done at the door - allow the community to shape the project to ensure buy-in.
- Don't underestimate the time needed for communication - estimate 2 1/2 times more time than you actually think things will take, in order to take communication into account.
- Work with agencies that have done similar studies and learn from their mistakes.

Develop Regulations, Ordinances or Laws

- Garner support from tribal leaders by regularly informing them of the ordinances' progress and encourage them to attend pertinent events (make the decision-makers your project partners).
- Utilize surveys and needs assessments to direct your project.
- Ongoing community involvement is necessary to ensure support.
- The ordinances should be culturally sensitive and appropriate.

Develop a Technical Program

- Treat elders as experts, and allow them their say to set path for project implementation.
- Ensure stable staffing pattern by hiring qualified, passionate and culturally knowledgeable personnel.
- Open up Advisory Council to a cross-section of the community and community partners so that a variety of information and ideas are represented in project deliverables.

Fish pond projects:

- Rubber-lined ponds are better than fabric liners
- Constantly monitor the insect content of the water (this grantee feeds its ponds with local river water to ensure a stable insect content)

Sustainability Strategies

What is needed for sustainability?

- Community communication
- Awareness and marketing about the project
- Highlight Successes
- Strong Community ownership
- Training Local Trainers
- Incentives
- Private Funding
- Partnerships
- Have non-profit status
- Local entrepreneurship
- Have a Business plan
- Focus on strengths
- Think long-term
- Volunteers
- Good Management
- Valid Market
- Outside Revenue Streams
- Avoid over-reliance on one individual
- Incentives
- Dedicated Staff
- Long-term vision
- A project that works
- Committed constituency of participants, staff, community members, and Board/Tribal Council/Leadership
- Have defined short term and long-term goals.
- Have an effective planning process
- Passion
- Politicking – networking
- Financial Plan and Budget
- Good financial systems and accountability
- Contingency Plans
- Policies, procedures, guidelines on operations, human resources, etc.
- Good communications with meetings, marketing, and outreach
- Good management and leadership
- Offer meals and food

- Recognition and celebrations
- Involve the community
- Shared vision
- Interoperability
- Leadership buy-in (philosophical and/or financial)
- Selling/marketing program
- Money
- Visibility
- Community assessment
- Flexibility
- Engaging outside resources and partnerships
- Documentation of impact
- Continued goals and objectives
- Project evaluation
- Political will
- Wealthy friends
- Promote interoperability
- Adaptability
- Demonstrate success
- Long-term partnerships
- Get the you7th involved
- Public education/marketing
- Staff training
- Community buy-in
- Have volunteer mentors
- Develop community partnerships with group that have similar goals
- Find other funding sources
- Accountability
- Providing evidence of success to future funding sources

How do you achieve programmatic sustainability?

- Do a community assessment
- Write and use a strategic plan
- Have powerful friends
- Partner
- Credential your teachers
- Teach financial literacy
- Look into doing Community Supported Agriculture (CSAs)

- Mentoring/training of personnel, community and youth
- Valuing employees and volunteers
- Promote positive thinking and doing
- Long-term goals and benchmarks
- Written curriculum for participants/trainers/and with DVDs, etc.
- Employee buy-in and community assurances
- Ongoing incentives
- Focus on limiting staff turn-over
- Strong evaluation and data collection
- Have political allies/support, and mobilize
- Good facilities and have a backup plan if not
- High expectations and standards
- Having core values and vision
- Have incentives and recognition
- Culture-spirit driven

How do you achieve political sustainability?

- Establish personal connections with partners and community
- Have benchmarks and demonstrated results to gain credibility
- Regular communication
- Invite stakeholders to celebrations of success (keeps motivation high)
- Transparency
- Use Board and Leadership to build connections
- Recognize partner contributions
- Bring community members and leadership to see the project at work
- Being a reliable and valuable partner
- Identifying stakeholders
- Valuing diversity in partnerships
- Clear communication
- Building Relationships and Trust
- Finding new partners – network constantly
- Adaptable
- Well planned agendas
- Re-evaluating partnerships

Financial Sustainability

- Identify and Prioritize Needs
- Multi-market appeal (i.e. non-native)

- Leverage funding resources
- Innovative donor strategies (tech-based)
- Establish clear profit motive
- Don't throw away your business plans
- Take advantage of non-profit/tribal status if competing in the mainstream
- Networking – be sensitive to funding opportunities even in non-fundraising situations
- Developing relationships with corporations
- Find sponsor that supports similar services
- Look for ways to get items/services for free (internships, etc.), “welfare to work”
- Write for new grants
- Apply to United Way.

Grantee Suggestions on Preventing and Overcoming Challenges

Staff Turnover

- Provide competitive salaries and benefits.
- Provide effective staff training.
- Provide culturally appropriate job training.
- Hire the right person for the job.
- Clearly define the roles and responsibilities of each position.
- Hire qualified people with expertise in the position.
- Provide cross training for staff in the event staff turnover occurs.
- If a staff person leaves, consider bringing on a consultant or contractor to temporarily fill the vacant position. Doing so will continue a project's progress and, if applicable, utilize allocated federal funds for the vacated position.

Late start

- Research your tribes' hiring procedures during the project planning stage. Some tribes require a position to be open for at least 45 days before a hiring decision may be made.
- Familiarize yourself with the project and OWP so you can hit the ground running.
- Begin marketing the project as soon as possible to make people aware of it.
- Maintain communication with ANA to avoid or manage any delays in start-up processes.

Scope Too Ambitious

- Use the OWP as a guide and step-by-step means of implementing your project.
- Focus on accomplishing one thing at a time – break the project down into manageable pieces.
- Recruit volunteers to help out with the project's implementation.
- Delegate work evenly amongst project staff and according to areas of expertise.

- Collaborate with your partners to see if you can lessen your workload – sometimes a partner may already be implementing similar activities and you can simply work with them rather than reinventing the wheel – this will ensure there is no duplication of effort.
- Use all resources available to you.

Geographic Isolation / Travel

- Plan ahead – complete activities with the weather/seasons in mind.
- Use local resources (consultants, volunteers, etc.).
- Provide incentives such as gas cards if you are having difficulties with participation due to travel distances.
- Provide transportation to project participants

Lack of Expertise

- Research other resources that may be able to provide staff training or volunteer to work on the project.
- Take the time to train your staff, it will save you time in the long run.
- Cross-train your staff with other departments or agencies.
- Utilize your partnerships for capacity-building.

Challenges with ANA Processes

- Maintain contact with your program specialist.
- Contact your program specialist as soon as you begin experiencing any difficulties.
- Be patient and anticipate that ANA processes can take a long time (the average grant action takes 3 months).
- Work on what you can while waiting for confirmation.

Underestimated Project Cost

- Leverage as many resources as you can through partnerships and available resources.
- See if there is another department, organization, or partner willing to share costs.
- Market your project as much as possible, which will help attract leveraged resources and project support – remember, word of mouth is free!

Underestimated Personnel Needs

- Find volunteers to work on your project.
- Use summer interns and students.
- Delegate project tasks as evenly as possible amongst your staff and maintain open communication to ensure your staff can handle the extra workload.

- Collaborate with your partners to see if you can lessen your workload – sometimes a partner may already be implementing similar activities and you can simply work with them rather than reinventing the wheel – this will ensure there is no duplication of effort.
- Build a partnership with the AmeriCorps, as they provide volunteers to fit an organization’s needs.

Partnership Fell Through

- Immediately begin research for finding a replacement based on what that partner was bringing to the project.
- Use existing resources to make up for the loss.
- Look at alternative options for implementing your project without changing the project scope.
- Plan ahead and do not design a project that relies heavily on one specific partnership.

Lack of Community Support

- Rely on the community to help develop the project idea – involving people in the planning process will lead to their participation in the project’s implementation.
- Provide incentives for meetings, trainings, and workshops.
- Create an atmosphere of communication and collaboration with the community.
- Market your project as much as possible, especially at social events.
- Conduct active marketing techniques such as face-to-face visits, phone calls, community meetings, etc.

Hiring Delays

- Provide competitive salaries and benefits.
- Begin marketing the project as soon and as much as possible to increase awareness.
- Have other staff fill in during the hiring process.
- If possible, work on other aspects of the project while waiting for new hires.
- Seek advice and support from your governing board or council.
- If you will be hiring project staff with very specific qualifications, research the local talent pool to see if candidates exist.
- Research your tribe’s hiring procedures during the project planning stage. Some tribes require a position to be open for at least 45 days before a hiring decision may be made.