



Finding a Unicorn!

Small Wastewater System Funding Series

Session 7: Federal Award Management
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Today's Presenters:



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Series Overview:

Designed to address the needs of small wastewater systems serving < 10,000, which typically have limited capability to pursue funding without assistance.

12-part series

- learn where to look for nationally available funding,
- how to craft a high-quality proposal, and
- comply with federal requirements through project completion

Every other Tuesday Jan 13 through May 5, 2026

all sessions will be recorded and available for download

Series Overview:



Following the project process from pre-development to closeout

Session 1 completed: The Funding Landscape

Session 2: Compelling Applications Pt 1

Session 3: Compelling Applications Pt 2

Session 4: SRF Pt 1 - Basics

Session 5: SRF Pt 2 - CWSRF Options

Session 6: Grants & SRF Office Hours

Session 7: Federal Award Management

Session 8: Federal Procurement Stds

Session 9: Awards & Procurement Office Hours

Session 10: Negotiating Indirect Rates

Session 11: Award Closeout & Single Audits

Session 12: Indirect Rates & Closeout Office Hrs

Session Purpose:



Session 7: Federal Award Management

- Setting up systems for compliance; reporting & tracking allowable costs
- Typical federal award terms and conditions
- Review steps and roles needed to manage a public award or loan

Session 8: Procurement

- Federal standards for acquiring goods and services with public funds
- Rules governing contracting public infrastructure projects
- Competitive bid process

Session 7 Agenda



- Setting Up Your Award
- Award Terms & Conditions
- Policies & Procedures
- Financial Management
- Procurement & Public Works Projects
- Reporting
- Resources & Trainings

Setting Up Your New Award

- Assigning Roles
- Setting Up Source Documentation Folders
- Record Keeping
 - Payroll
 - Travel
 - Equipment/Supplies
 - Contract Services
 - Cost Analysis
 - BABA/AIS Certification



Award Terms & Conditions

Types of Terms:

- Reporting
 - Performance Reports
 - Financial Reports
 - Final Report
- Cybersecurity
- Quality Assurance Project Plan
- Established Policies



Policies & Procedures



Cross Cutting Requirements:

- Environmental Regulations
- Nondiscrimination
- Uniform Administrative Requirements
- Debarment and Suspension
- Procurement/BABA
- Single Audit

Grant Specific:

- Conflict of Interest
- Timekeeping
- Record Keeping
- Whistleblower
- Financial Internal Controls

Financial Management



Internal controls:

- Separation of Duties
- Segregation of Funds
- Program Income
- Entity Registrations & Subaward Reporting
- Personnel Allocation



- Allowable
- Reasonable
- Allocable
- Necessary
- Documented!

Source Documentation (cheat sheet)

Personnel / Payroll (2 CFR §§ 200.430 and .431)

- Time/Activity Reports (Timesheets)
- Worksheet showing fringe benefit calculations (if not calculated by accounting system)

Travel (2 CFR § 200.475)

- Breakdown of costs (e.g., hotel, per diem, mileage, etc.)
- Receipts (airline, hotel, etc.)

Equipment / Supplies (2 CFR §§ 200.439 and .453)

- Authorization to purchase item
- Invoice from vendor or Receipt of item & approval of invoice

Contractor Services (2 CFR § 200.459)

- Signed contract
- Contractor's invoices (include activity performed, date(s) of service)

Cost / Price Analysis (2 CFR § 200.324)

- Documents supporting cost or price analysis in connection with every applicable procurement action in excess of the Simplified Acquisition Threshold

Other (training/tuition, phones, repairs, subawards, etc.)

- Travel vouchers, etc. (see "Travel" above)
- Receipts (registration fees, tuition, membership fees, etc.)
- Copies of phone bills, shipping invoices, vehicle maintenance bills, etc.
- Copies of awards

Indirect Costs (Overhead)

- Indirect cost rate proposal submitted to Cognizant Federal Agency
- Proof of consistent application of de minimus

Invoicing Grants - Best Practices

- Invoice in Arrears
 - Immediate cash needs
- Frequently as allowable
- Exact amounts
- Review Financial Reports with Team
- Direct vs Indirect Costs Distinction*
- Document Cost Match



Procurement

- **Micro-purchase** (\$10,000 or less) - without competition
- **Small purchase** (\$250,000 or less) - quotations
- **Over simplified acquisition** (threshold over \$250,000) - sealed bids or competitive proposals.

Subaward vs Contract

- **Subawards:** Carry out a portion of a Federal award and creates a Federal assistance relationship
- **Contracts:** Obtain goods and services through a procurement relationship with the contractor

Public Infrastructure Projects

Build America, Buy America (BABA)

Requires iron, steel, manufactured products, and construction materials used in the project are produced in US

American Iron & Steel (AIS)

Use iron and steel products produced in the US for the construction, alteration, maintenance, or repair of public water supply systems or treatment works

Davis Bacon (DBRA)

Prevailing wages must be paid by all contractors and sub-contractors on all federally funded and assisted public works projects in excess of \$2,000

Disadvantaged Business Entities (DBE)

Utilize MBE, WBE, and other DBE firms when procuring services, equipment, supplies, and construction

Monitoring Subs

- Check SAM.gov Disbarment
- Structure the contract to reflect complexity of the procurement type and amount
 - Include federal flow down provisions
- Must be licensed and bonded if needed
- Ensure payment is for work completed
- Utilizes DBEs (disadvantaged business enterprise)

Changes to the Award

Needed when:

- Change in the scope or the objective of the project
- Transferring 10% of the total line item in the budget
- Changes in key personnel
- Disengagement from the project for more than three months, or a 25% reduction in time
- Transfer of funds budgeted for participant support costs to other categories of expense
- Subawarding, transferring or contracting out any work under Federal award
- **Get a no-cost extension if needed**

Do & Don't Summary



Do:

- Get preapproval for changes
- Reread your terms and conditions
- Keep organized files
- Set calendar reminders
- Separate duties
- Get pro bono TA and training
- Track all your time and capture all your personnel costs

Don't:

- Have someone doing all tasks
- Spend funding on things not in your budget
- Contract with friends and family
- Have contractors prepare RFPs and then Bid on them
- Request funds if not spent
- Miss deadlines for reporting

Deeper Dives on Grant Management



- [EPA Grants Management Training](#)
- [National Nonpoint Source Pollution Control Program - Basic Training](#)
- [Tribal NPS Resources](#)
- [EPA Grants Webinars](#)
- [EPA CWSRF Webinars](#)
- [California Water Boards](#)
- [**Environmental Finance Center \(EFC\) Network**](#) ←

Thank You!



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