



Fall Forum 2023
Bracing For Significant Regulatory Changes

FEDERAL GRANTS MANAGEMENT TEST



Bonnie Graham, Esq.
 bgraham@bruman.com
Brandi Tennant, Esq.
 btennant@bruman.com
Nate Kristel, Esq.
 nkristel@bruman.com





1

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 1

A federal programs office wants to use federal education funds for a working lunch. Can they?

- No, you can never use federal funds for food
- No, you can only use federal funds for dinner
- Maybe, as long as they have approval from the State
- Maybe, if they can make a compelling case that unique circumstances justify the cost as reasonable and necessary



The Bruman Group, PLLC © 2023. All rights reserved.

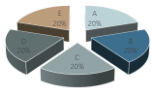

2

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 2

What new class of individuals was added to the conflict-of-interest provisions in the proposed UGG updates?

- Foreign Officials
- Indian Tribes
- Whistle-blowers
- Union Members
- Board Members

The Bruman Group, PLLC © 2023. All rights reserved.

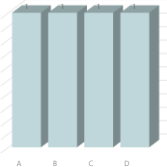
3

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 3

If an employee working 100% on a federal grant is paid 50% with nonfederal funds and 50% from federal funds, what percentage should be reflected on their time and effort?

- a. 100%
- b. 75%
- c. 50%
- d. 0%



The Bruman Group, PLLC © 2023. All rights reserved.

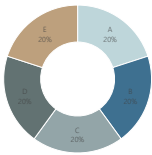
4

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 4

Which of the following costs under the proposed rule will no longer require prior written approval?

- a. Pre-award costs
- b. Participant support costs
- c. Entertainment costs
- d. A,B, and C
- e. A and B only



The Bruman Group, PLLC © 2023. All rights reserved.

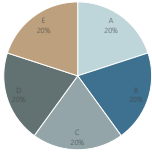
5

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 5

What are possible consequences of non-compliant time and effort documentation and the certification of inaccurate information therein?

- a. Liability under the False Claims Act
- b. Formal Bruman scolding
- c. Required implementation of Personal Activity Reports
- d. Both A & C
- e. None of the above; documentation of time and effort is optional



The Bruman Group, PLLC © 2023. All rights reserved.

6

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 6

Can a grantee use the public emergency exception today to non-competitively procure services for July 2024?

- a. Yes
- b. Yes, but only for services less than \$50,000
- c. No
- d. No, unless the costs are under \$75,000
- e. N/A, the proposed UGG update removes the public emergency exception

The Brunson Group, PLLC © 2023. All rights reserved.

7

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 7

In what type of procurement method are bids publicly solicited with price being the primary consideration?

- a. Combinatorial bids
- b. Sealed bids
- c. Open bids
- d. Dutch auction
- e. Competitive bids

The Brunson Group, PLLC © 2023. All rights reserved.

8

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 8

To be allowable a cost must be:

- a. Under \$500
- b. Incurred during the approved budget period
- c. Unnecessary, unreasonable, and unallocable
- d. Included or used to meet cost sharing requirement

The Brunson Group, PLLC © 2023. All rights reserved.


9

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 9

If an employee spends 100% of their time working on an indirect cost activity, does that employee need to maintain time and effort?

- a. Yes
- b. Yes, but only under the proposed changes to the UGG
- c. No
- d. No, but only under the proposed changes to the UGG



The Brunson Group, PLLC © 2023. All rights reserved.


10

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 10

Under the UGG, how often must non-federal entities conduct a physical inventory?

- a. Annually
- b. Every two years
- c. At least every three years
- d. As often as required by the non-federal entity's policies and procedures



The Brunson Group, PLLC © 2023. All rights reserved.

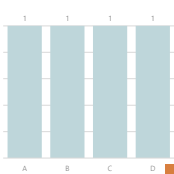
11

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 11

Are computing devices considered "equipment" or "supplies" under the UGG?

- a. Equipment
- b. Supplies
- c. Supplies, if less than \$500 (\$1,000 proposed)
- d. Supplies, if less than \$5,000 (\$10k proposed)



The Brunson Group, PLLC © 2023. All rights reserved.

12

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 12

Equipment was purchased for a federal program under ED, but other federal programs want to use it. Can they?

- Yes, with preference going to other ED programs
- Yes, with preference going to the program that needs it the most
- No
- No, unless the other programs pinky promise to keep it nice

Option	Percentage
A	25%
B	25%
C	25%
D	25%

The Brunson Group, PLLC © 2023. All rights reserved.

13

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 13

Equipment with a current per unit fair market value of _____ or less may be retained, sold or otherwise disposed of with no further responsibility to the Federal awarding agency.

- \$500
- \$1,000
- \$50
- \$10,000
- \$5,000

Option	Percentage
A	20%
B	20%
C	20%
D	20%
E	20%

The Brunson Group, PLLC © 2023. All rights reserved.

14

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 14

Under EDGAR, when does travel obligate?

- When the travel is taken
- When you pay for your flight/rental car
- On the second day of the last month of the year in which the travel is anticipated or 7 business days after the last week in which the travel was purchased
- One day after you return from travel
- Midnight two days before travel is taken

Option	Percentage
A	20%
B	20%
C	20%
D	20%
E	20%

The Brunson Group, PLLC © 2023. All rights reserved.


15

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 15

What method do institutions of higher education general use to handle program income?

- a. Deduction
- b. Addition
- c. Multiplication
- d. Renumeration



The donut chart displays four equal segments, each representing 25% of the total responses. The segments are labeled A, B, C, and D, corresponding to the four options listed in the question.

The Brunson Group, PLLC © 2023. All rights reserved.

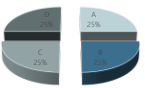
16

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 16

Which financial management rules do states have to follow?

- a. 2 CFR 200.302(b)
- b. U.S. Department of State requirements
- c. Their own rules
- d. Anything that applies to federal entities



The donut chart displays four equal segments, each representing 25% of the total responses. The segments are labeled A, B, C, and D, corresponding to the four options listed in the question.

The Brunson Group, PLLC © 2023. All rights reserved.

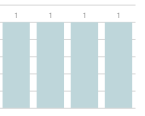
17

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 17

Cash advances must be maintained in insured accounts. Accounts must be interest bearing unless:

- a. The aggregate of federal awards is under \$120,000
- b. The account is not expected to earn in excess of \$500 per year
- c. The bank requires a minimum balance so high that such account not feasible
- d. All of the above



The bar chart displays four bars of equal height, each representing 1 response. The bars are labeled A, B, C, and D, corresponding to the four options listed in the question.

The Brunson Group, PLLC © 2023. All rights reserved.

18

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 18

Internal controls must

- Comply with the U.S. Constitution
- Evaluate and monitor compliance
- Take prompt action to correct noncompliance
- Safeguard personally identifiable information (PII)
- All of the above
- None of the above

The donut chart displays the following data: A (10%), B (17%), C (17%), D (17%), E (17%), and F (17%).

The Brunson Group, PLLC © 2023. All rights reserved.

19

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 19

A district purchases 100 computers with federal funds, 20 of the computers are damaged. When the district returns the 20 damaged computers, they receive a refund. What must the district do with the refund?

- Credit the full refund amount back to the federal award
- Credit only up to \$1,000 back to the federal award
- Use the money for alcohol for an office party
- Hide it in a safe place

The donut chart displays the following data: A (25%), B (25%), C (25%), and D (25%).

The Brunson Group, PLLC © 2023. All rights reserved.

20

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 20

Which item can never be purchased with federal funds?

- Candy apples
- Assorted balloons
- Cordless microphones
- Clowns
- Alcohol

The Brunson Group, PLLC © 2023. All rights reserved.


21

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 21

When employees are paid based on projected budget costs, *this* must happen before the close of the grant award.

- Performance Review
- Liquidation
- Equitable Accounting
- Reconciliation
- Cognizable Agency Approval



The donut chart is divided into four equal segments, each labeled with a letter and '20%': A (top right, light blue), B (top left, brown), C (bottom, grey), and D (bottom left, dark blue). A small orange square with the letter 'D' is located in the bottom right corner of the slide.

The Brunson Group, PLLC © 2023. All rights reserved.

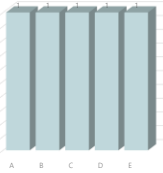
22

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 22

What is the federal Simplified Acquisition Threshold?

- \$250,000
- \$50,000
- \$500
- \$2,500
- \$25,000



The bar chart shows five vertical bars of equal height, labeled A, B, C, D, and E from left to right. A small orange square with the letter 'D' is located in the bottom right corner of the slide.

The Brunson Group, PLLC © 2023. All rights reserved.

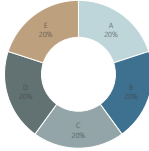
23

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 23

In general, do the purchase thresholds apply for each purchase or each vendor per fiscal year?

- Each vendor
- Each purchase
- Each vendor if for a service
- Each purchase for supplies and equipment
- C & D



The donut chart is divided into four equal segments, each labeled with a letter and '20%': A (top right, light blue), B (top left, brown), C (bottom, grey), and D (bottom left, dark blue). A small orange square with the letter 'D' is located in the bottom right corner of the slide.

The Brunson Group, PLLC © 2023. All rights reserved.

24

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 24

A recipient consolidates its ESEA administrative costs and receives awards for Title I and Title II programs. How many cost objectives does an employee that administers both programs have?

- a. No cost objectives
- b. One cost objective
- c. Two cost objectives
- d. Three cost objectives

The Brunson Group, PLLC © 2023. All rights reserved.

25

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 25

A recipient may pay legal defense fees with award funds in which of the following circumstances?

- a. A federal criminal proceeding
- b. A state criminal proceeding
- c. A civil fraud proceeding
- d. An administrative fraud proceeding
- e. None of the above

The Brunson Group, PLLC © 2023. All rights reserved.

26

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 26

What is a cost-share?

- a. Any contribution of non-federal funds or property put toward a project cost
- b. A contribution of non-federal funds that is equal to the federal funds put toward a project cost
- c. A third-party in-kind contribution of non-federal funds put toward a project cost
- d. Non-federal property donated toward a project

The Brunson Group, PLLC © 2023. All rights reserved.

27

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 27

What is Cooperative Audit Resolution and Oversight Initiative (CAROI)?

- A new mandatory resolution program proposed in the UGG updates
- An alternative to traditional resolution that allows recipients to retain funds if they collaborate on a solution with the awarding agency
- A type of resolution that involves cooperative oversight between the awarding agency and DOJ
- A social club for individuals interested in federal grants management

The Bruman Group, PLLC © 2023. All rights reserved.

28

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 28

Which of the following place binding requirements on recipients?

- Agency guidance
- Dear colleague letters
- Federal statutes
- Final agency rules
- C & D

The Bruman Group, PLLC © 2023. All rights reserved.

29

Fall Forum 2023
Bracing For Significant Regulatory Changes

QUESTION 29


In which grade level did Michael Brustein meet Leigh Manasevit (the founders of The Bruman Group)?

- First grade
- Second grade
- Eighth grade
- Ninth grade

The Bruman Group, PLLC © 2023. All rights reserved.

30

Fall Forum 2023
Bracing For Significant Regulatory Changes



LEGAL DISCLAIMER

This presentation is intended solely to provide general information and does not constitute legal advice or a legal service. This presentation does not create a client-lawyer relationship with The Bruman Group, PLLC and, therefore, carries none of the protections under the D.C. Rules of Professional Conduct. Attendance at this presentation, a later review of any printed or electronic materials, or any follow-up questions or communications arising out of this presentation with any attorney at The Bruman Group, PLLC does not create an attorney-client relationship with The Bruman Group, PLLC. You should not take any action based upon any information in this presentation without first consulting legal counsel familiar with your particular circumstances.

The Bruman Group, PLLC © 2023. All rights reserved. 31

31



Save The Date!!!

The Bruman Group, PLLC
Spring Forum 2024
APRIL 30 - MAY 2, 2024

32

32
