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## **Part 1 General**

### **Section 04 HHS Responsibilities**

#### **A. Principles**

Purpose This Grants Policy Directive (GPD) outlines the primary responsibilities of grants management staff [grants management officers (GMOs) and grants management specialists] and program officials/project officers in the award and management of HHS grants and grant programs. It also delineates the qualifications and authorities of individuals serving in those capacities.

Scope This GPD applies to all HHS discretionary grants and cooperative agreements and all HHS grant programs. For grants management staff involved in discretionary grant programs, this GPD serves to highlight significant general responsibilities; however, additional and more specific responsibilities may be addressed in other GPDs, as appropriate. Paragraph D.2. specifies the minimum requirements for GMOs responsible for mandatory grants. More detailed information on mandatory grants will be included in GPD 5.01.

Policy. Each OPDIV is responsible for (1) ensuring the integrity of its grants management operations by establishing and maintaining organizational arrangements that do not compromise or have the potential to compromise the independence of the GMO, (2) developing and implementing a Grants Management Professional Certification Program and providing the necessary resources and opportunities for training of grants management and program staff, and (3) periodically assessing the efficiency and effectiveness of the grants management function.<sup>1</sup> The Office of Grants Management, Office of Grants and Acquisition Management (OGM/OGAM), is responsible for overseeing OPDIV implementation of this policy.

#### **B. HHS Grants Management Professional Certification Program**

OPDIVs are responsible for establishing, in writing, and maintaining an OPDIV implementation of the HHS Grants Management Professional Certification Program.

### **C. Authorities and Responsibilities**

#### Organizational Placement of Grants Management Function.

Grants management staff are primarily responsible for the business and other non-programmatic areas of grant award and administration. They are responsible for ensuring that, for grants under their cognizance, both federal staff and grantees fulfill applicable statutory, regulatory, and administrative policy requirements.

(The process and requirements of the HHS Grants Management Balanced Scorecard are currently under development. As a result, GMOs must be independent of program management offices. A GMO may not report to an official who exercises program management authorities unless that official is the head of the OPDIV or the arrangement has been authorized by the OPDIV's Chief GMO and approved by OGM/OGAM.

#### Grants Management Officers

Chief Grants Management Officer. Each OPDIV that accomplishes any part of its mission through the use of grants and cooperative agreements must appoint a Chief GMO. The OPDIV head is responsible for appointing the Chief GMO in accordance with the following and any OPDIV requirements. The Chief Grants Management Officer will be the appointing authority for any additional OPDIV GMOs.

#### Appointing Grants Management Officers:

(1) As a prerequisite to appointing an individual as a GMO, including the Chief GMO, the appointing official must determine that the individual has the requisite grants and business management background and experience to perform fundamental business management functions. This will be demonstrated, in part, through satisfaction of the prerequisites of the HHS Grants Management Professional Certification program (see paragraph B. above).

(2) An individual may sign Notices of Grant Award (NGAs) and amendments thereto and exercise other GMO responsibilities only if formally delegated such authorities by the Chief GMO. However, OPDIV Heads and regional Office Heads may exercise GMO authorities as a result of their organizational delegations of authority.

Grants Management Specialists. Grants management specialists are individuals that work under the general direction of a GMO.

Other Non-Program Staff. OPDIVs may use other staff, including grants policy staff and audit resolution staff, in support of their grants management functions. OPDIVs must specify the necessary qualifications for these positions. If such individuals need to act as GMOs to carry out any part of their responsibilities, they must satisfy the qualification and appointment requirements for GMOs (Paragraph C.2.)

Program Officials

Program staff designated as program officials/project officers (hereafter, project officer) are responsible for the programmatic, scientific, and/or technical aspects of grants. A project officer must be appointed for each grant award, but an individual may serve in that capacity for multiple awards.

In selecting program officials to serve as project officers, OPDIVs should take into consideration such factors as training and experience; knowledge of applicable laws, regulations, and policies; and knowledge of awarding office goals and priorities.

Individuals appointed as project officers should meet within 12 months of their appointment training requirements established by the Deputy Assistant Secretary for Grants and Acquisition Management and may be certified under an OPDIV's certification program.

**D. Significant Responsibilities**

The following list of activities highlights those that form the essence of the separation of responsibilities of the grants management and program management functions. The list is not intended to be all-inclusive.

As used in this paragraph, GMO means the individual with delegated authority or, for activities comprised of multiple procedures that may be performed at a lower level, the GMO or grants management staff acting on his or her behalf.

Signature Authority. Grant awards and amendments are not binding on the Federal Government unless signed by the cognizant GMO, OPDIV head, or regional office head.

Choice of Instrument. Program officials are responsible for indicating in preaward documentation, including any program announcement, whether a program or project should be implemented through a grant(s) or cooperative agreement(s). If the use of a cooperative agreement(s) is indicated, program officials are required to establish the nature of

the Federal Government's involvement in the activity during project performance.

GMOs are responsible for determining the appropriate award instrument consistent with GPD 2.02.

Program Announcements. Program officials are responsible for developing program announcements as early as possible in a fiscal year to allow sufficient time for applicants to prepare applications and awarding offices to make resulting awards.

GMOs may assist in the development of program announcements. GMOs are required to review and clear these documents for publication prior to their issuance. If a GMO has concerns with a program announcement that cause him/her not to provide the required clearance, it may not be issued unless the OPDIV head overrides the GMO's concerns.

Competitive Review Process. Program officials are responsible for overseeing the selection of qualified independent review panels and providing them with the necessary information and material to conduct their evaluations.

GMOs are responsible for reviewing and approving the instructions provided to independent review panels prior to their being convened; advising panels, as necessary; and signing or countersigning the ranking of applications by these panels.

The above responsibilities do not apply to OPDIVs/programs in which the independent review process is managed by an office other than the cognizant program office.

Preapplication and Application Review. Primary responsibility for performing budget and costs analyses to determine the necessity, reasonableness, and allocability of costs in application budgets rests with GMOs. The program official, in coordination with the GMO, is responsible for ensuring that application budgets meet project needs and program requirements, and supplying to the GMO, as necessary, programmatic or technical information to use in negotiating grant budgets.

If a program or support mechanism requires preapplication submission, program officials are required to evaluate the submissions for relevance to solicitation topics or stated needs and to determine their conformance with program requirements and guidelines. Program officials are responsible for debriefing unsuccessful applicants regarding programmatic deficiencies in their applications.

Business Management and Prior Approvals. Following award, GMOs are responsible for reviewing and signing all subsequent business-related correspondence concerning grants. Although not required, program officials/project officers may countersign notices of grant award and other business-related correspondence sent to grantees

Mandatory Receipt and Control Points. GMOs serve as official receipt and control points for grant applications unless this responsibility has been assigned to a servicing office other than the cognizant grants management/program office under the authority of an individual not in the line of program authority.

GMOs serve as the official receipt and control points for all required grantee reports, other than reports required by the paying office, invention reports, and any other class of reports received by a designated central non-program office, and all formal communications or contacts that, if approved, would result in changes to an award, including its terms and conditions.

Official Grant Files. GMOs are responsible for maintaining the official grant files for individual grant awards. Program officials will supply such material as necessary to ensure that the official grant files are complete.

Reports and Closeout. In addition to being the mandatory receipt point for required reports, GMOs are responsible for monitoring the receipt of all required reports and taking appropriate follow-up action, as necessary, to obtain delinquent reports. GMOs must also review and ensure all necessary adjustments to financial reports are made prior to grant closeout.

Project officers are responsible for reviewing and preparing programmatic evaluations on all performance reports required to be submitted under grants. Following the completion of all required work under grants by grantees and the performance of all pre-closeout administrative actions by OPDIVs, GMOs are responsible for closing out grant awards/files. In doing so, they must ensure that grant files contain all pertinent documents, including required reports, and evidence that appropriate grants management and program office reviews and evaluations have been conducted.

Audit Resolution. GMOs are responsible for resolving or participating in the resolution of audit findings involving grant programs. When audit resolution is handled by other designated staff, the cognizant GMO must be afforded the opportunity to review and comment on the OPDIV position prior to notifying the grantee.

Minimum Grants Management Officer Responsibilities for Mandatory Grants  
GMOs for mandatory grant programs must be independent of program management offices. GMOs for mandatory grant programs will not report to an official who exercises program management authorities (including approval of grant applications/plans) unless that official is the OPDIV head.

GMOs for mandatory grant programs are required to sign or countersign NGAs.

GMOs for mandatory grant programs are responsible for maintaining the official grant files for individual grant awards.

GMOs for mandatory grant programs are responsible for monitoring the receipt of any required financial status, expenditure, and estimate reports.

GMOs for mandatory grant programs must participate in the resolution of audit findings, including concurring with or approving audit resolution actions.