

Managing Infrastructure Grants Successfully

Post-Award Grants Management Basics
Hub Infrastructure Summit 2026





Agenda

- I. Set Up for Success
- II. Manage the Award
- III. Close out and Audit Readiness
- IV. Key Takeaways and Q&A

How to Prepare for Award

You've been awarded – now what?

1

Read the Notice of Award

Check period of performance, authorized budget, special conditions, and any pre-award costs that need approval. Understand what triggers a modification.

2

Create your grant file

Paper or electronic — every award needs a dedicated file. Include the NOA, application, budget, correspondence, and all supporting documentation from day one.

3

Brief your team

Based on the assigned roles in your application and current team, adjust and ensure everyone is aware of their responsibilities before the implementation begins.

4

Internal Kickoff

Review in depth the scope of work, timeline, budget allowability, reporting schedule, and compliance requirements. Don't assume everyone read the award.

What's in your Notice of Award?



Authorized amount and period of performance

What you were awarded may differ than what you requested. Costs may only be incurred within the period of performance start and end dates unless pre-award costs are explicitly allowed.



Program contacts, reporting schedule, and modification triggers

Reporting cadence, your federal point of contact and the list of changes that require prior approval are documented in the NOA – know these before implementation begins.



Special Conditions

Requirements you must satisfy before continuing implementation of a project. These may require completion before release of funds or drawdown.

Financial Setup

Separate Account Tracking

Federal funds must be tracked separately from other accounts. Your accounting system must support grant-specific reporting

Segregation of Duties

No single person should authorize, record, and reconcile transactions - 2 CFR§200.303

Drawdown process

Understand your grantor's payment system. Plan drawdown timing — most grants require quarterly reporting and drawdown unless otherwise specified. Infrastructure projects often have long lead times before first drawdown.

Cost share (match) tracking

Properly document cash and in-kind match from the beginning of the project period.

Key Cost Principles

2 CFR§403-405, Subpart E

Allowable

Permitted under the award, regulations, and the terms of the grant agreement

Allocable

Directly benefits the project being charged – costs must be proportional to the benefit received

Reasonable

What a prudent person would pay under similar circumstances – not what is convenient

Consistent

Applied the same way across all Federal awards – no selective treatment

Procurement Requirements

Documented procurement procedures required

2 CFR § 200.318 – you must have written procurement policies before contracting

Know your procurement thresholds

Micro-purchase, simplified acquisition, sealed bids, and proposals each have different requirements. Sealed bids are preferred for construction services.

Sam.gov and debarment checks

All contractors and subrecipients must be registered in sam.gov and clear of debarment throughout your award period.

Conflicts of interest must be documented

Vendors who helped develop specs or requirements are disqualified from competing. A written COI policy is required under §200.318(c).

Infrastructure Specific Compliance

National Environmental Policy Act (NEPA)

- Projects may require specific environmental compliance review(s), if not covered by Categorical Exclusion
- No choice-limiting actions relating to hard costs until the review is complete.
- May include historic preservation (Section 106), hazardous materials survey, floodplain management, etc.

Davis-Bacon & Related Acts (DBRA)

- Generally, applies to contracts over \$2,000 for construction, alteration, or repair.
- If applicable, laborers and mechanics must be paid prevailing wages.
- Pull the appropriate wage rate determination, review payrolls regularly, conduct site interviews regularly.

Buy America/Build America (BABA)

- IIJA-funded projects must use iron, steel, manufactured products, and construction materials produced in the United States.
- Waivers are available but require federal approval.
- Document compliance from procurement through construction.

Reporting and Monitoring

What You Report:

2 CFR §200.329

Financial Reports (SF-425)

Actual expenditures, unliquidated obligations, cumulative totals. Documents compliance with fiscal terms and conditions

Programmatic Reports

Progress against your approved work plan, performance measures, and KPIs. Connect every report back to your approved scope and schedule

Ongoing Monitoring

- Watch for scope creep, cost overruns, and schedule slippage early
- Keep a running log of issues and how they were resolved – your audit trail
- Document everything – undocumented oversight is the same as no oversight
- If you pass funds to subrecipients, you are responsible for their compliance (§200.332)
- Conduct desk reviews or site visits for active subrecipients at least annually

Budget Management & Modifications

01

Track budget vs. actuals consistently

Don't wait for quarterly reporting. Regular reconciliation catches problems early — before they become findings or require emergency modifications.

2 CFR §200.302(b)

02

Know when prior approval is required

Significant rebudgeting (typically 10%+ of total award), scope changes, and new cost categories require funder approval before you act — not after.

2 CFR §200.308

03

No-cost extensions are not automatic

Request early, document the reason, and confirm your period of performance before assuming an extension will be granted. Many funders have hard deadlines.

2 CFR §200.308

Closeout and Records Retention

- **Start closeout planning – 90 days before period of performance ends**
Review open obligations, identify unspent funds, confirm all deliverables are still on track.
§200.344
- **Submit final financial and programmatic reports**
SF-425 final report, performance report, final equipment disposition, etc. Typically due within 90 days of the performance period end date
§200.344
- **Return unobligated funds and resolve open items**
Liquidate all obligations, return excess draws (if existing), resolve any monitoring findings or corrective action plans before the grant is closed.
§200.345
- **Retain records for a minimum of 3 years**
3 years is the baseline from the date of final expenditure report. It could be longer if litigation is pending, an audit is open, or real property/equipment was purchased.
§200.334

Audit Readiness

- 01 Document at the time it happens**
Contemporaneous documentation is required. Records created after the fact are not equivalent to records created at the time of the activity. (§200.337)
- 02 Maintain the grant files in real time**
Record retention requirements begin from the date of final expenditure report – but an auditor can request records at any point during the award period (§200.334)
- 03 Train staff to recognize questioned cost**
A questioned cost is any expenditure that cannot be verified as allowable, allocable, and reasonable under 2 CFR Part 200 Subpart E.
- 04 Review prior findings before each award cycle**
Prior compliance history is an explicit factor in recipient/subrecipient risk assessments

The 48-Hour Test

Can you produce these within 48 hours of request?

- Policies and procedures
- Financial records and invoices
- Payroll and personnel files
- Programmatic reports
- Procurement and contracts
- Subrecipient files (if applicable)

Key Takeaways

The award letter starts the clock — read your Notice of Award cover to cover before you spend a dollar. Every condition, deadline, and modification trigger in it is binding from day one.

Compliance isn't a checklist, it's a system — financial management, procurement, reporting, and monitoring all have to work together. A program hitting its targets can still have a financial compliance problem.

Documentation is your defense — if you can't produce it in 48 hours, it's a system gap. Build documentation into the workflow from day one, not in preparation for an audit.

Ask before you act — budget changes, scope modifications, and no-cost extensions all require prior approval. Retroactive approvals are rarely granted, and undisclosed changes become findings.

Closeout is a phase, not a moment — your obligations don't end when the period of performance does. Records must outlast your project, and audits can happen after the award is closed.