

## REQUEST FOR CHANGES TO THE STATE ADMINISTRATIVE MANUAL (SAM)

Agency Code: 088  
Department: Office of Federal Assistance  
Appointing authority: A'Keia Sanders, Director  
Agency contact (name, phone and e-mail): Mayita Sanchez, mayitasanchez@ofa.nv.gov

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Proposed BOE date: June 10, 2025

Proposed effective date: July 1, 2025

### 1. Reason/purpose for requested change:

- ⇒ Addition of information addressing Assembly Bill 445 (2021) and the Grant Matching Program (GMP)
- ⇒ Introduced references to the Office of Federal Assistance as the centralized coordinating body for federal financial assistance in Nevada (OFA)
- ⇒ Aligned sections with the 2025 Statewide Plan on Maximizing Federal Assistance and the Nevada Grant Manual (2023 edition)
- ⇒ Clarified interagency collaboration responsibilities and risk-based practices in line with OFA policy and guidance
- ⇒ Added requirements for agencies submitting Notices of Funding Opportunities (NOFOs) to the NEVADAePro system, in alignment with OFA Guidance Memo 25-02
- ⇒ Updated Federal Funding Accountability and Transparency Act (FFATA) reporting requirements to reflect the retirement of FSRS.gov and the transition to SAM.gov for subaward and executive compensation reporting, effective March 8, 2025

### 2. Explain how the recommended change(s) will benefit agencies or create consistencies or efficiencies, etc. (provide examples if applicable): the recommended changes to SAM increase clarity and alignment with current statute and guidance and establish OFA as the centralized authority for grant coordination streamlining interagency communication, ensuring consistency in policy interpretation and reducing duplicative efforts. Changes also improve risk management and transparency with the inclusion of risk-based grant practices, mandatory subrecipient risk assessments and strengthened reporting procedures with FFATA updates via SAM.gov. There is also a formalizing of GMP guidance into SAM which allows agencies to proactively determine eligibility for math support, as well as updated language on subrecipient monitoring, drawdown timing, and standardized training opportunities for grant workforce development across state government.

### 3. Will recommended change have a fiscal impact (if yes, explain): no.

4. Existing and recommended language in SAM (*blue bold italics* is new language being proposed and ~~red strikethrough~~ is deleted language being proposed). **(please provide requested change as an attachment):**

Appointing Authority: 

BOARD OF EXAMINERS APPROVAL DATE: \_\_\_\_\_  
*(for BOE use only)*

# SAM EDIT REVISIONS: Draft Recommendations

## Key References to Federal Financial Assistance in SAM Chapter 3000:

SAM 3002-3008	Defines the roles of state agencies in accepting and managing federal grants, requiring prior approvals, single audit compliance, and maintaining financial records
SAM 3016-3018	Emphasizes the importance of internal controls for grants
SAM 3020-3022	Covers grant budgeting, amendments, and reporting responsibilities
SAM 3024	Details requirements for closing grants, financial reconciliation, and retention of records

## 3000 Grant Requirements

### 3002 Purpose

This chapter assists executive branch agencies in complying with federal and State law, regulation, and procedure as they relate to grants and cooperative agreements. *It incorporates statutory requirements outlined in NRS 223.460 to NRS 223.498, including provisions for the Nevada Grant Matching Program.* This chapter *provides a* ~~is intended to provide a broad~~ policy-level overview, *while detailed grant-related procedures are published* ~~Detailed information on grant administration is~~ found in the Nevada Grant Manual, available on the Office of Federal Assistance website.

### 3003 Centralized Coordination of Federal Grants

*The Office of Federal Assistance (OFA), created in 2022, serves as the centralized coordination and compliance entity for federal and non-federal assistance. OFA is responsible for assisting agencies in identifying, applying for, and managing federal grants in alignment with the State Plan for Maximizing Federal Assistance. State agencies will engage with OFA in accordance with NRS 223.478 and provide notification of all grant activities under NRS 223.480.*

### 3004 Intergovernmental Review and Notification

The Office of Federal Assistance (OFA) *is designated as Nevada's Single Point of Contact* ~~acts as the authority on grants in Nevada providing technical assistance for grant development and management. The OFA is designated as Nevada's Single Point of Contact~~ under the *Federal Executive Order 12372, Intergovernmental Review of Federal Programs and oversees the state's intergovernmental grant coordination. In alignment with NRS 223.478 and the Nevada Grant Manual, state agencies must notify* ~~This designation is intended to strengthen coordination and foster intergovernmental partnerships. To this end, a number of notifications are required for both federal and State grant awards as described in the Nevada Grant Policy Manual. Pursuant to NRS 223.480, State agencies are required to notify the OFA of all any grants applied for or received and report any unexpended balances at for which agencies apply and receive, as well as the amount unexpended by~~ the end of the grant performance period. *This process supports data-driven decisions and statewide grant tracking through OFA's centralized systems.*

## **3006 Interagency Coordination and Strategic Alignment**

*To advance statewide priorities and avoid duplication of effort, state agencies are encouraged to coordinate with other executive branch entities when pursuing major federal opportunities.*

*Agencies should consult with the Office of Federal Assistance (OFA) when:*

- (1) Applying for large or cross-sector federal grants;*
- (2) Responding to a funding opportunity aligned with statewide or interagency strategies (e.g., workforce development, infrastructure, broadband);*
- (3) Developing a new grant program that may require shared implementation of data collection.*

*OFA may convene or facilitate collaborative planning efforts to align applications with the State Plan for Maximizing Federal Assistance and ensure the best positions of the State as a whole.*

## **3008 State Clearinghouse**

[Nevada State Clearinghouse](#), within the Department of Conservation and Natural Resources State Lands Division, administers the State's review process of federal direct development and grant-in-aid projects. The review process coordinates the preparation of comments for federal agencies on public land transfers, military activities and major development projects requiring environmental impact analysis. State Clearinghouse operations are authorized by [Federal Presidential Executive Order 12372, Intergovernmental Review of Federal Programs](#) issued in 1982. This order implements Section 201 and Title IV of [the Intergovernmental Cooperation Act of 1968](#) and Section 204 of [the Demonstration Cities and Metropolitan Development Act](#) of 1966. They also help implement Section 102 (2) (c) of the [National Environmental Policy Act of 1969](#). State agencies engaged in direct development projects that are subject to review under the [National Environmental Policy Act of 1969](#) must submit a copy of each project document (Environmental Assessments or Environmental Impact Statements) to the [Nevada State Clearinghouse](#), or send the address of the website on which the document is posted.

## **3016 Grant Workforce Development and Training**

*To promote a high -performing grants workforce, each agency is encouraged to designate a grant point of contact and ensure staff involved in federal grant writing or administration receive ongoing training. The Office of Federal Assistance (OFA) offers training and technical assistance in areas such as:*

- (1) Federal Uniform Guidance (2 CFR 200)*
- (2) Risk assessment and monitoring*
- (3) Indirect cost recovery and budgeting*
- (4) Grant writing and performance reporting*

*State agency staff are encouraged to complete annual refresher training or onboarding via OFA or approved equivalents.*

## **3018 Pre-Award Processes**

- A. Prior to the submission of an application and acceptance of a grant award, an agency must ensure that internal controls and a financial management system are in place to adequately manage funds and activities. Prior to grant proposal submission, an internal review must be completed to determine if

appropriate resources are available to commence and maintain program activities. Furthermore, the agency must determine that it has the authority to submit the application on the State's behalf.

- B. If the internal review determines appropriate resources are available to maintain the program and the agency has authority to submit a grant application on the State's behalf, the steps below are guidelines for writing a grant proposal. Refer to the [Nevada Grant Manual](#) for additional guidance on preparing for and managing a successful grant application.
1. Identify the problem, gap in service, or need;
  2. Determine measurable goals and objectives;
  3. Define an approach or methodology to meet the goals and to solve the problem;
  4. Catalog all available resources and additional resources needed for the proposed project;
  5. Create a timeline for completion;
  6. Develop a reasonable budget for the activities involved in the proposal, including indirect costs, if applicable;
  7. Identify any match, cost sharing, or maintenance of effort\* requirements of the grant; ~~and~~.
  8. Create an evaluation plan for continuous quality improvement and sustainability.
  9. *Evaluate whether the proposed project addresses the needs of underserved or frontier communities. Grant applications that propose targeted strategies for equity, access, and community inclusion are encouraged, in alignment with the State Plan for Maximizing Federal Assistance. Agencies are encouraged to incorporate community data, demographic analysis, and stakeholder input into proposal design; and*
  10. *For grants requiring a cost-share or match, assess eligibility for support under the Nevada Grant Matching Program (GMP) (NRS 223.490). This includes documenting attempts to secure alternatives of match and providing the required risk and technical documentation for review by OFA.*

\*A maintenance of effort provision requires the State to maintain its financial support to a program for some period of time and may require future legislative appropriations at a certain level.

- C. **Subaward vs. Contract.** Prior to submitting a federal grant application, the best practice is to determine whether awarded funds will be passed through to subrecipients or contracted to vendors. Agencies should evaluate the substance of the relationship and make a case-by-case determination using the guidelines in the [Nevada Grant Manual](#). If an entity is determined to be a contractor/vendor, an agency must use Nevada's procurement policy and procedures in SAM 0300. If an entity is determined to be a subrecipient, SAM 3022 applies.

## 3022 Post Award Processes

- A. Pursuant to [NRS 353.245](#), each agency must provide a copy of its grant application and its grant awards to both the Governor's Finance Office and the Legislative Counsel Bureau's Fiscal Analysis Division.
- B. An agency may not incur expenditures without proper budget authority. Therefore, agencies must budget for the grant award if it was not approved as part of the legislatively approved budget. Changes to existing budget authority are completed through work program requests. (see SAM 2524) The information on the notice of grant award and the submitted application will assist in the completion of the work program documents. Also, the completion and submission of a [Job Number Maintenance Form \(KTLOPS-35\)](#) to the Controller's Office is necessary to ensure appropriate tracking of revenue

and expenditures for each award.

C. Unless authorizing language specifically prohibits it, an agency may use awarded grant funds to:

1. directly implement projects to carry out specified program objectives;
2. subaward to another organization; and/or
3. contract with a vendor to deliver goods and services.

D. Subaward Procedures. The policies below outline the procedures for issuing subawards. Deviations from these policies should be justified, documented, and retained in the agency records.

1. Agencies must develop a Notice of Funding Opportunity (*NOFO*) for interested parties to ensure the required and necessary information is included in any applications or proposals required by the agency. *In accordance with Guidance Memorandum 25-02 and Policy 088-005, all NOFOs must also be submitted to the centralized NEVADAePro (ePro) system for publication and transparency. Submission ensures statewide visibility of funding opportunities and alignment with state-level procurement and grant-making standards.*
2. Unless subgrantees/recipients were specifically identified in the grant application, the best practice for distribution of grant funds to other State agencies, tribal, and/or nonprofit entities is to conduct a competitive process. The competitive process involves a group of subject matter experts ranking the proposals. Final allocation is based on the ranking and justification from the awarding agency. Agencies not using a competitive process should document the reasons why.
3. State and federal regulations require the disclosure of conflict of interest for evaluators participating in the process of ranking competitive proposals. For non-competitive grant programs, the person with authority to determine the final distribution must provide a conflict-of-interest disclosure.
4. The completion of a *subrecipient* risk assessment is required before issuing a subaward agreement. The awarding agency is responsible for evaluating each subrecipient to determine the risk of noncompliance with the applicable federal and/or State statutes, regulations, and terms of the subaward. Timeliness is critical to the risk assessment process mandated by [2 Code of Federal Regulations \(CFR\) 200.519](#).
5. Prior to issuing a final subaward, the agency must ensure the recipient is not on the federal System for Award Management Excluded Parties list for debarment and/or suspension.
6. ~~With few exceptions, agencies must make grant payments for expenditures on a reimbursement basis.~~ *Agencies may disburse grant funds to subrecipients either on a reimbursement basis or through advance payments, as appropriate to the terms of the award and the assessed risk level of the subrecipients. Payment Reimbursement* requires the submission of correct and complete source documentation to back up all expenditures incurred *or obligated* in the implementation of the approved project, and an accurately completed fiscal report. ~~Payment Reimbursement~~ to subrecipients must occur within 30 calendar days of the receipt of the request/fiscal report by the awarding agency.
7. Grant agreements must be amended whenever changes to the original approved document occurs. This includes the obligation, compensation, and expiration date. The changes to the key personnel found in the original grant agreement also require an amendment.
8. State agencies with authority to pass through funding to other entities are required to monitor subrecipient compliance with applicable federal and state requirements for grants. Annual review of subrecipient Single Audit Reports is required. Agencies must monitor subrecipients to determine the progress made against goals and indicators of performance to determine whether the desired

results are occurring, confirms the implementation is on track and that the results measured are the direct and short-term consequences of program activities.

- E. Reporting. An agency receiving grant funds must follow the established policies and procedures for distribution, submission and review of the required fiscal and program reports. Agencies must also comply with any reporting requirements identified in statute or legislation. Best practices and forms are available by contacting the OFA.
1. In addition to financial reporting, performance reporting is also important. Performance reports reflect the activities accomplished in furtherance of the grant objectives and highlight community impact. Performance reporting may include compliance data to ensure that program activities meet federal and State regulations. Performance reporting also maintains *transparency and* may be used to leverage additional awards in the future.
  2. *Performance reports should include both outputs (activities completed) and outcomes (changes resulting from activities). Agencies are encouraged to use logic models, theories of change, or program performance indicators to frame grant reporting. This approach is consistent with the Nevada Grant Manual and supports transparency, accountability, and alignment with state priorities.*
  3. In preparation of the State Single Audit Report and to confirm the information about grant awards from each agency, the [State Controller's Office](#) relies on the agency to certify that the information about grants it manages is correct as reflected at that time in the State financial management system. It is important that agencies provide information on the Controller's Single Audit Reporting Form in a timely fashion so that the State Controller may complete its Schedule of Expenditures of Federal Awards.

#### F. State Agency Reimbursement via Federal Draw Down

1. A **draw down or draw** is the process used by State agencies to request reimbursement of federal grant expenditures from the federal awarding agency. Draws require an agency to notify the State Treasurer's Office by completing a Federal Draw Request Form located at [Nevada Treasurer's Website](#), creating a cash receipt (CR) document in the State financial management system and placing it on "hold." The Treasurer's Office will access the appropriate federal portal and perform the draw. An agency that draws directly from a federal agency must also submit an Incoming Funds Notification form found at the [Nevada Treasurer's Website](#), create the CR in the financial management system, and place it on "hold."
2. The federal [Cash Management Improvement Act](#) requires the federal government and the states to minimize the time between transfer of federal funds and payments made by the states for grant program purposes. Agencies must time draws of federal funds to minimize the time between deposits and disbursements. Drawing federal funds too soon incurs an interest liability to the federal government; drawing them too late costs the State with reduced interest earned on its cash balances.

#### G. Federal Funding Accountability and Transparency Act Reporting

1. *Agencies that issue first-tier subawards or contracts in the amount of \$30,000 or more in federal funds are required to report these transactions in accordance with the Federal Funding Accountability and Transparency Act (FFATA).*
2. *As of March 8, 2025, all subaward reporting must be conducted through SAM.gov, as the former FFATA Subaward Reporting System (FSRS.gov) has been officially decommissioned. Reporting functionality is now available through SAM.gov platform at <https://sam.gov>.*
3. *Reports must be submitted by the end of the month following the month in which the subaward or contract was obligated.*
4. *Agencies must also report the total compensation of the five most highly compensated executives of the recipient and subrecipient if the following conditions are met (2 CFR 170):*
  - a. *The subrecipient received 80% or more of its annual gross revenues from federal contracts (including subcontracts), loans, grants (including subgrants), and cooperative agreements during the preceding fiscal year; and*
  - b. *The subrecipient received \$25 million or more in annual gross revenues from federal sources during the preceding fiscal year; and*
  - c. *The public does not already have access to this information about the compensation of the executives through Securities and Exchange Commission (SEC) filings or Internal Revenue Service (IRS) 990 forms.*
5. *Agencies are responsible for verifying subrecipient eligibility and maintaining*



*internal controls to ensure accurate and timely reporting.*

6. *Entities that receive less than \$30,000 in gross income from all sources in the previous tax year are exempt from FFATA subaward and executive compensation reporting.*
7. *Agencies should review the latest guidance on the SAM.gov Subaward Reporting page to ensure compliance and may contact OFA for technical assistance and clarification.*
- ~~8. An agency that passes funds through to a subrecipient or contractor for an amount greater than \$30,000 is required to report the transaction by the end of the month following the month in which the agency awards the subaward or contract using the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS). The FSRS reporting tool is used by federal recipients to capture and report subaward and executive compensation data about their subawards. The website for the FSRS portal is [www.fsr.gov](http://www.fsr.gov).~~

## 3024 Closeout

- A. Grant closeout includes, but is not limited to, the following tasks:
  1. Completion of any final draws of funds;
  2. Completion of the final program report; and
  3. Completion of the final financial report.
- B. Reconciliation of expenditures, including subawards, is essential to grant closeout. Subawards close as projects are completed or at the end of their performance period.
- C. A balance remaining on a federal award that will not be used is called a deobligation. Agencies should minimize deobligations to the federal government. Deobligated funds to a federal awarding agency must be reported to the OFA.
- D. State agencies must confirm the completion of all applicable administrative actions and all mandatory work required by a federal grant award or any other award, as outlined in the [Nevada Grant Manual](#). All grant, subgrant and contract documentation for fiscal and program activities must be kept for a minimum of three (3) years from the date of the final reimbursement request.
- E. *For GMP-supported grants, closeout reports must be submitted to OFA within 30 calendar days of the federal grant period's end. Unused GMP funds will be unencumbered and returned to the Grant Matching Account for future awards (NRS 223.492).*