
Grant Administration Initiative

Readiness Guide for Chapters

Cathy Crabtree



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Introduction

CAC Chapters have been in a period of rapid growth and development over the last several years. Perhaps you have been at a conference or in a collaborative meeting and learned about an exciting initiative another Chapter has undertaken that sparked your interest. Amidst the generosity of idea sharing, many Chapters learn about and wish to pursue projects and initiatives that run a spectrum—from the next right step to a step that will overrun their current capacity.

Southern Regional Children’s Advocacy Center has designed a series of readiness guides to assist CAC Chapter organizations in conducting reflective self-analysis before committing to a specific statewide initiative. These readiness guides are not intended to be used together or to build upon one another. Rather, they are designed to address the implementation of specific, stand-alone, statewide initiatives. The hope is these guides will help you grow your Chapter’s capacity to prepare for the initiative you wish to undertake, or perhaps help your Chapter understand when an initiative may not be the right fit at its current stage of development.

Chapters that have assumed responsibility for administering state and/or federal grants to local member centers in their state were consulted in the development of this guide. The guide is built on the wisdom and insights they shared. It is not intended to encourage or discourage Chapters from taking on the responsibility for grant administration, but rather to equip Chapters with as much information as possible about the benefits and risks that such an undertaking may entail. Only you, your board, your membership, and other key stakeholders can accurately assess your Chapter’s level of readiness to take on such an endeavor.

For the most part, this guide is based on the experience of Chapters that are 501(c)(3) nonprofit organizations, which is the majority of Chapters in the nation. However, our hope is that the guidance provided throughout this resource will also be thought-provoking for Chapters that might operate under the governance of an umbrella nonprofit organization or even a government agency. Taking on responsibility for administering funding and related monitoring activities is a complex, significant step for any Chapter, regardless of its governance structure and therefore a comprehensive assessment process is critically important. Not everything contained within this guide will be directly applicable to every Chapter, but the intent is that its contents provoke thoughtful questions and conversations that will serve your organization in its effort to assess readiness.

Wherever you find yourself on the developmental spectrum, your Regional CAC is here to help your Chapter grow and evolve to meet the emerging needs of the CACs in your state—and, ultimately, to ensure survivors of child abuse in your state find hope and healing.

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How to Use This Guide

This guide starts with *why* and *why not*. We believe the best initiatives are always grounded in the *why*, and that understanding *why not* may help you weigh the choice about whether to proceed with undertaking the administration of government grant funding to member CACs in your state.

Next, you will find a series of checklists that ask relevant questions. These questions are centered around items it would be wise to consider before undertaking this initiative. Answer the questions as accurately as possible because they will serve as key components for evaluating your Chapter's readiness.

Following each checklist, you'll find information that explores those central components—or readiness focus areas—with a description of what you may want to consider. When you are deciding whether to undertake this initiative, don't be concerned if you aren't able to answer "yes" to all of the questions. Rather, we have designed the questions and their descriptions to help you weigh each area's importance. Given the scope and complexity of this initiative, we recommend Chapters complete the guided reflection section after reviewing the focus area checklists and questions and consult with your Regional CAC for assistance prior to moving forward.

Finally, the hope is that you will review this readiness guide in partnership with others. This guide will be most useful if you use it with a committee, workgroup, or team. You may want to consider including key staff at your Chapter, representatives of CACs in your state, and Chapter board members. Proceeding with a grant administration initiative will impact all these stakeholder groups for years to come, so including them at the outset of the project will help you evaluate options related to undertaking this role.

For Chapters that have already started serving as grant administrators for government grant funding, this guide might support your efforts to continue to strengthen that process and mitigate risks to the Chapter as well as to the local centers. While "starting over" on an initiative like this is likely not an option, there may be opportunities when contracts come due for renewal—with your funding agency and/or with your local CACs—to modify some of the requirements, processes, and expectations. We hope this guide might inform your decision making around those negotiations and related governance.

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What Do We Mean by Chapter Grant Administration?

CACs—whether government-based, independent non-profit, or umbrella non-profit models—are expensive entities to operate and sustain. They rely heavily on skilled professional staff and contractors, require unique facility space and equipment, and depend upon specialized, ongoing training for personnel and multidisciplinary team members—all of which require significant, reliable, and sustainable funding.

Fortunately, over the course of the past decade, government grant funds from both state and federal sources have become more readily available to support CACs and the vital work they do. In many cases, Chapters play a vital role in helping to secure relevant funding and, in about 30% of states,¹ Chapters also serve as the administrators of those grant funds on behalf of their member centers. For purposes of this guide, when we talk about *grant administration*, we are referring specifically to the administration of state and/or federal funding for CACs. This type of funding administration is different than basic pass-through of private or foundation funding to member centers—which generally involves a lesser level of legal and fiscal capacity, responsibility, and risk. Administration of government grant funding typically includes responsibility for:

- Ensuring continued and/or increased funding on behalf of CACs across the state
- Contracting with government funding agencies for combined funding on behalf of CACs across the state
- Issuing, screening, and approving CAC funding applications and requests
- Executing comprehensive subcontracts with the governing entities of member centers
- Processing and issuing regular CAC grant payments (either up front or on a reimbursement basis)
- Monitoring member CACs for compliance with grants/financial contracts, agreements
- Monitoring member CACs for compliance with programmatic requirements, including standards and/or other program-related requirements tied to issuance of grant funds

Most common federal grant dollars for CACs (e.g., VOCA, TANF, etc.) are awarded to individual states and managed by specific state government agencies. Therefore, similar to state grant funding, it will be these state agencies that Chapters will be working with when they assume responsibility for administration of federal grant funds to member CACs. The specific state agencies that receive and allocate federal funds vary from one state to the next.

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¹Chapter Census and Needs Assessment, National Children's Alliance. 2021.

Why Some Chapters Opt to Serve as Grant Administrators for Member CACs

Investing in the growth, development, and sustainability of local member CACs is central to a Chapter’s mission to ensure that every child within their state has access to the unique services that only a CAC can provide. Clearly, having adequate financial resources is core to the health and functioning of member CACs. Therefore, many Chapters see grant administration as a viable activity that supports member CACs individually and the statewide CAC movement collectively. Chapters that currently administer government grant funding to their member CACs cite several benefits—for both Chapters and member CACs—as reasons they opt to engage in this activity:

- Underscores the “single, collective voice” for all CACs statewide when ensuring funding with relevant stakeholders
- Elevates awareness and cultivates a deeper understanding about the CAC model among key statewide stakeholders and policy makers and, in some cases, expands the scope of CAC activities eligible for grant funding
- Ensures equitable and consistent levels of financial support for all CACs in the state (rural, suburban, urban, etc.)
- Mitigates situations where CACs must actively compete with one another in pursuit of government grant funding
- Reduces the need for CACs, individually and independently, to get bogged down in bureaucracy and red tape that often comes with government agency procurement, grant management, and monitoring
- Provides the Chapter with greater insight into the day-to-day operations, needs, and resources of its member centers—knowledge that can inform the Chapter’s future training, technical assistance, and advocacy efforts
- Provides an opportunity to expand the scope, capacity, and resources of the Chapter itself

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Why Some Chapters Opt Not to Serve as Grant Administrators for Member CACs

In many cases, Chapters that are in the earlier stages of development may simply not have been given opportunities by state policy makers and/or state agencies to serve in the role of grant administrators for their local member CACs. Alternatively, there are also a number of Chapters that have made conscious decisions not to seek, pursue, or engage in grant administration activities. Some of the reasons these Chapters cite for their decisions in this regard include:

- Uncertainty about this being an appropriate role in which a membership association should engage
- Concern about the Chapter's ability to effectively balance potentially conflictual relationships with member centers—serving as a membership association and a grant monitor
 - Member CACs may become hesitant to acknowledge struggles, gaps, needs that the Chapter might otherwise assist them with, for fear of negative impact on funding eligibility
- Member centers lack collaborative relationships with one another, and thus the willingness to be held accountable to one another—as well as to the Chapter—does not currently exist
- Lack of consistent support among local member centers for the Chapter to serve in this role:
 - Member CACs that have, historically, been highly successful in securing funding directly from government funding agencies may fear they will no longer wield the same amount of influence within these agencies and/or with state legislators and policy makers
 - Member CACs may be concerned about the possibility their current funding could be reduced in an effort to equitably distribute it among all CACs in the state
- Legal and fiscal risks to the Chapter that exceed the Chapter board's current level of risk tolerance
- Lack of staff capacity and/or expertise to effectively fulfill this role
- Other Chapter priorities supersede grant administration and the investment (time, money, attention, etc.) that it would entail, at least for the foreseeable future

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Item	Yes	No	Don't Know
Are all (or most) member centers expressing a desire for the Chapter to engage in this activity?			
Will all member centers be eligible to apply for and receive the proposed funding?			
Can the Chapter sustain a challenge to its relationships with its own member centers at this time?			
Do member centers have strong, trusting relationships <i>with one another</i> and see themselves as a connected, collaborative movement in which <i>all</i> must succeed for <i>any</i> to succeed?			
Do all (or most) member centers already receive funding from a state agency or other entity of which the Chapter is considering taking over administration?			
Is the proposed funding consistent with CAC activities (current or administrative)?			
Will this be a non-competitive grant solicitation process for member centers?			
Is there consensus among membership regarding how funding amounts/funding formulas for the grants are or will be determined?			
Will this be the primary/only large-scale statewide project or transition for the Chapter and its members at this time?			

Are all (or most) member centers expressing a desire for the Chapter to engage in this activity?

If the Chapter assuming responsibility for grant administration is governed by member centers, it will be important to determine if this is coming from all (or most) of your member centers or just a few loud voices. If there is not consensus among member centers, the Chapter should explore the diversity of opinions and work to understand what might be behind those differing opinions. Even if there is consensus, the Chapter will need to identify the motivation behind this push to best determine whether it is positioned to meet and address the needs, expectations, and concerns of its member centers before proceeding with exploration of this initiative.

Will all member centers be eligible to apply for and receive the proposed funding?

If these grant funds are not available to all member centers, the Chapter will want to gauge how much of its resources (time, money, attention) will be required and, because it is likely to be significant, to consider whether it is fair for the Chapter to engage in an activity from which all its member centers cannot or will not benefit. The Chapter should consider how taking on grant administration that benefits some, but not all, of its member centers might impact relationships between member centers and the Chapter and among member centers themselves.

Can the Chapter sustain a challenge to its relationships with its own member centers at this time?

Because assuming grant administration responsibilities is such a complex and expansive undertaking, it is likely that not all of your member centers will be 100% on board with it. In addition, the Chapter may not have options or discretion regarding all the details—much of this may be dictated by the funding agency or even the legislative body that approved the funding. Consequently, there will likely be aspects related to determining grant amounts, administration processes, monitoring requirements, etc. that the Chapter will be required to follow, which some member centers may not be happy about. The Chapter will want to honestly assess its current level of trust and relationships with member centers to determine if it can afford to take on an initiative that may also prove to be highly contentious.

Do member centers have strong, trusting relationships *with one another* and see themselves as a connected, collaborative movement in which *all* must succeed for *any* to succeed?

Equally important will be the level of trust and relationships among member centers. Like any statewide effort, this one requires a willingness for individual CACs to compromise to ensure all CACs in the state benefit. For some this might mean a reduction in the funding that they are currently receiving, additional monitoring, or more oversight than they are used to receiving. If member centers are unable to look at what is in the best interest of the *entire network as a whole*—but rather are focused only on what is in the best interest of their individual CACs—the Chapter will most assuredly

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get caught in the crossfire when attempting to develop and implement funding distribution formulas, agreed-upon processes, etc. Splintering among membership can have far-reaching, negative implications for the statewide CAC movement in general and, eventually, will impede its ability to effectively serve children and families across the state.

The Chapter may need to invest its energy and resources in relationship-building among member centers and cultivating a mutual commitment to shared goals before embarking on efforts to take on CAC grant administration activities.

Do all (or most) member centers already receive funding from a state agency or other entity of which the Chapter is considering taking over administration?

If the funding the Chapter is considering administering is new funding that none of the member CACs currently receives, it is far less complicated to develop agreed-upon distribution formulas, processes, etc. However, if some or all the centers are already receiving this funding, directly administered by a state agency or other entity, it may get a bit more complicated, depending on what each center's experience has been with that agency. For those centers already receiving the funding, the Chapter needs to understand and clearly communicate if and how centers' grant amounts and related expectations might change in the event that administration is transferred to the Chapter.

Victims of Crime Act (VOCA) is a good example of this for several Chapters. In many states, some CACs had already been successful in securing VOCA grants (directly from a state agency) to support their centers while others had been unable to get a foot in that door. When the Chapters in some states took over administration of the VOCA grants for CACs, many faced challenges from member centers. Those who were already getting significant funding were content to maintain the current process and preferred not to rock the boat. Thus, they had reservations about the Chapter taking on this role. However, CACs *not* able to secure VOCA funding or centers that felt they were not receiving as much in VOCA funding as they deserved, were fully in support of the Chapter taking on this role because they thought they would benefit from the move. These situations required time and a lot of thoughtful consideration and communication on the part of the Chapter in order to take this on without causing undue conflict among its member centers.

In cases where the CAC is a program of a larger umbrella organization that has other programs (i.e., family violence, sexual assault, Court Appointed Special Advocates [CASA] programs), it is possible they may be the recipient of grants for those programs—possibly administered directly by a state agency or by another state membership association or coalition. Those experiences may inform whether these member CACs will be in support of the Chapter taking on grant administration, given that it might entail different processes than those in place for the organization's other programs. For some directors, this might be seen as burdensome, since they will have to deal with two or more differing sets of rules and requirements related to the

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same type of funding. The Chapter will want to assess the impact its efforts might have on umbrella organizations to effectively address those concerns early in the process.

Is the proposed funding consistent with CAC activities (current or administrative)?

The Chapter will want to thoroughly explore the requirements for member CACs related to the grant funding—gaining clarity about what grantee activities might be required, what activities might be measured or monitored, what reporting is mandated, etc. If any of this is inconsistent with common, accepted CAC operations or standards, it could cause serious problems for the CACs as well as for the Chapter. If the grant requirements represent significant changes for the centers, the Chapter will want to know this up front and ensure its ability to orient the centers, provide training and technical assistance on implementation of these changes, etc.

Will this be a non-competitive grant solicitation process for member centers?

If member centers will be competing with one another for funding, the Chapter will need to understand and address the possible ramifications of it being perceived by centers as the arbiter of who receives grant funding and who does not. It will be important to establish clear, fair, and objective criteria for the grant application and award processes, removing subjective decision-making about awards from the Chapter and its staff.

Is there consensus among membership regarding how funding amounts/funding formulas for the grants are or will be determined?

In some cases, grant funding is awarded as a flat amount that can be applied for and awarded equally across the board. However, it is not unusual for the Chapter to be asked to develop and implement a funding formula to ensure fair and equitable funding distribution to best support all CACs. If this is the case, the Chapter will want to solicit input from the membership in the process of developing a reasonable formula that does not, for example, unintentionally favor large urban centers over smaller rural centers or vice versa. Most Chapter funding formulas involve awarding an equal base amount of funding to all CACs and then the remainder of the total amount of funds are distributed based on concrete, objective criteria such as population or child population of the CAC's service area. If service data (# of children served, # of forensic interviews, # of family advocacy or medical or mental health services provided, etc.) are to be a part of the formula, it will be important that the data is collected and compiled consistently and reliably by all CACs across the state with the accuracy of that data being easily verifiable.

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Will this be the primary/only large-scale statewide project or transition for the Chapter and its members at this time?

Successfully taking on the role of grant administration is a complex and heavy lift for any Chapter. Having the bandwidth to explore and consider all potential benefits and identify and mitigate all potential hurdles requires a significant investment of time and attention by Chapter leadership, board, staff, and membership in order to be successful. If the Chapter is in the process of undertaking other significant and important initiatives, it may be best to postpone pursuit of grant administration opportunities until the Chapter is in a better position to focus solely on this major undertaking. In addition, a Chapter that is going through a leadership transition or that has recently experienced controversy or conflict among and within its membership ranks, may want to consider whether the timing is right for taking on grant administration responsibilities.

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Chapter Authority and Role

Item	Yes	No	Don't Know
Is there anything in the Chapter's bylaws or policies that would preclude or inform its eligibility to take on the role of grant administration for its member centers?			
Will local member CACs execute funding contracts directly with the Chapter or with the funding agency?			
Will the Chapter have the authority to monitor grant-funded member centers (financially and/or programmatically) to ensure compliance with contracts and related statutes, standards, etc.?			

Is there anything in the Chapter's bylaws or policies that would preclude or inform its eligibility to take on the role of grant administration for its member centers?

Chapters should explore their bylaws and any other organizational documents or policies to ensure there are no boundaries in place that might preclude the Chapter from engaging in activities such as grant administration. While this is unlikely to be directly addressed within bylaws and policies, there may be more subtle or indirect references pertinent to the intended mission, purpose, and activities of the organization that could raise questions about the authority of the Chapter to assume this role. For example, do the bylaws state or imply specifically that the Chapter's role with member centers is to deliver training and technical assistance *only*? Or do the bylaws make any reference to restricting the Chapter's authority to dictate how a member center functions or is structured that might be construed as restricting the Chapter's authority to monitor the center fiscally or programmatically? Might conflict of interest restrictions for board members make decision-making related to grant administration burdensome or even impossible? A careful read of the bylaws should assess for these types of potential issues.

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Will local member CACs execute funding contracts directly with the Chapter or with the funding agency?

The Chapter's level of legal and fiscal responsibility and risk are tied directly to the specifics of the contractual relationship with the funding agency as well as with the member centers. In order to accurately assess and manage risk levels, the Chapter will want to be clear about the legal contracting relationships between the Chapter and the state agency, the state agency and the member centers, and/or the Chapter and the member centers. If the Chapter is executing formal subcontracts with the member centers, it is taking responsibility for the actions of the centers and their employees, as specified in those contracts. The contract the Chapter executes with the state agency should clearly and specifically outline what the Chapter can and will be held accountable for and what authority the Chapter has for enforcement of the subcontract requirements.

Will the Chapter have the authority to monitor grant-funded member centers (financially and/or programmatically) to ensure compliance with contracts and related statutes, standards, etc.?

The Chapter will want to establish clarity with the state agency regarding its expectations related to monitoring of the grant-funded member centers—financially and/or programmatically. Does the agency have specific requirements about the frequency of or specific processes included in monitoring activities of the Chapter?

The Chapter will want to know in advance exactly what the state agency's monitoring of the Chapter will be regarding its contract as well as its subcontracts: *How frequently will monitoring occur? What records must be retained for review? What will the entire monitoring process entail and who will be involved in that process?* Having clear answers to these questions will inform the grant management and recordkeeping processes the Chapter will want to implement at the start of the contract.

There is no way to overstate the enormous responsibility and workload that is typically involved in fulfilling programmatic or financial monitoring—let alone both. It is important that the Chapter does its due diligence to assess exactly what this will actually entail and then to gauge what it will need to do in order to meet the related challenges. Chapters may need to add specialized staff with applicable experience in this area; visit with other Chapters that have experience in this arena; speak with state funding agencies that have engaged in monitoring (preferably with CACs) to hear what their recommendations might be; and so on.

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Item	Yes	No	Don't Know
Does the Chapter currently have staff in place with the expertise, experience, and bandwidth needed for grant management activities? Or does the Chapter have the capacity to hire and orient/train such staff in a timely manner?			
Will there be qualified supervisory staff in place to direct, support, and evaluate grant management staff?			
Will the Chapter be able to clearly separate Chapter monitoring staff/roles from Chapter programming support staff/roles?			

Does the Chapter currently have staff in place with the expertise, experience, and bandwidth needed for grant management activities? Or does the Chapter have the capacity to hire and orient/train such staff in a timely manner?

Grant management requires specific expertise and experience that most Chapters may not have on staff prior to assuming these responsibilities. Assuming that program staff can take this on as an additional duty may be naïve and risky. If current staff are to assume such responsibilities it will be important that they receive appropriate training and have resources available to guide them through the development and implementation of grant management processes.

Will there be qualified supervisory staff in place to direct, support, and evaluate grant management staff?

In addition to ensuring grant management staff have the needed expertise and experience, it is equally important that the individual who will supervise the employee(s) has adequate expertise to provide the necessary support and oversight (i.e., chief financial officer or finance director).

Will the Chapter be able to clearly separate Chapter monitoring staff/roles from Chapter programming support staff/roles?

Retaining the ability for member centers to feel comfortable sharing their challenges, problems, gaps, etc. in order to get support and guidance is critical for membership associations like Chapters. However, when the

Chapter also becomes a “monitor”—especially a grant monitor—member centers may have concerns about how challenges or issues they are struggling with might negatively impact their funding eligibility. To the greatest extent possible, Chapters should establish clear boundaries between their membership association relationship with centers and their funding contractor-subcontractor relationship with centers. In some cases, this can be aided by having separate staff assigned to the distinct areas of activity and responsibility. Regardless, full transparency and documentation of these two distinct and separate roles should be seriously contemplated and routinely communicated.

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Item	Yes	No	Don't Know
Has the Chapter developed a realistic, comprehensive budget for direct and indirect costs that will be incurred upon assuming the grant administration role? And will all costs be adequately covered through a flat amount or a percentage of the total awarded by the funding agency?			
Does the Chapter have funding available to engage in pre-agreement legal, financial, and/or other consultants to review contracts, develop grant management processes, etc.?			
Does the Chapter have funding to support a grant management system/software and related technical assistance for such systems (assuming it needs/plans to use such a tool)?			
Does the Chapter have sufficient cash flow to cover any up front costs it might incur in the process of implementing and maintaining the grant management activities?			

Has the Chapter developed a realistic, comprehensive budget for direct and indirect costs that will be incurred upon assuming the grant administration role? And will all costs be adequately covered through a flat amount or a percentage of the total awarded by the funding agency?

Perhaps the number one regret expressed by Chapters that have taken on the administration of grant funding for its member centers is underestimating the true costs and the financial resources needed to do this work well. In some cases, Chapters receive a separate grant from the state agency to cover their grant administration costs. In others, Chapters receive a percentage of the total allocation of CAC funding they will be administering. Regardless, having a realistic budget related to costs (personnel, training, information technology (IT), office space, travel for monitoring visits, etc.) prepared in advance will ensure that negotiations with the state funding agency begin and end in such a way that the Chapter will be compensated for the very real expenses this work entails. A programmatic cost to consider in addition to those mentioned above is a single audit, which can be triggered by increased amounts of federal funding.

In addition to budgetary implications, administrative costs can at times be a source of tension with member centers. Some don't understand how complicated it is to administer funding and see this as funding that should go directly to them. For more discussion about managing the relationship with member centers, see the "Membership Need & Readiness" section.

Does the Chapter have funding available to engage in pre-agreement legal, financial, and/or other consultants to review contracts, develop grant management processes, etc.?

In addition to the ongoing costs related to personnel, IT, travel, etc., the Chapter should consider whether it has—or can secure—appropriate funding or in-kind contributions of services to help guide the decision-making processes prior to receipt of any state or federal funding. Deciding whether to take on the grant administration role may require outside legal and financial consultants to help the Chapter assess if they have the structure and related processes required to ensure that funds are administered and monitored properly and, therefore, protecting the organization to the greatest extent possible.

Does the Chapter have funding to support a grant management system/software and related technical assistance for such systems (assuming it needs/plans to use such a tool)?

Depending on the dollar amount being administered and the number of member centers to which a Chapter will be administering grant funding, investment in a grant management system/software may be something to consider. If so, the Chapter should explore options and related costs and include this in its grant administration budget.

Does the Chapter have sufficient cash flow to cover any up front costs it might incur in the process of implementing and maintaining the grant management activities?

If the Chapter plans to hire new staff to assume responsibilities for grant administration, it will want to budget for the recruiting, hiring, and onboarding processes. In addition, initial training and related travel for new (or existing) staff costs should be factored in when developing a budget for these activities. Consider also if statewide travel for one-on-one or regional meetings with member CACs may be needed to share information about the initiative and/or to train local center staff on grant management expectations.

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External Relationships

Item	Yes	No	Don't Know
Will the Chapter's relationship with the state agency or requesting body be damaged if the Chapter declines the opportunity to serve as grant administrator?			
Does the Chapter have a good working relationship with the state agency that allocated grant funding will flow through/from?			
Does the Chapter have prior history with the funding agency and its current leadership? (If yes, is that history positive or negative?)			

Will the Chapter's relationship with the state agency or requesting body be damaged if the Chapter declines the opportunity to serve as grant administrator?

We've all heard the old saying, "Don't look a gift horse in the mouth." Sometimes, with the best of intentions, a state lawmaker or agency may initiate the idea of the Chapter administering funding to CACs in the state, not realizing the scope and weight of what they are offering. If the Chapter is simply not prepared or equipped to take this activity on and to do it effectively, it will be important for the Chapter to evaluate the potential impact on its relationships with the lawmaker or agency, as well as the relationships between any of the member centers and those same or other entities. Additionally, the Chapter should be strategic in how it messages its response and how it can suggest alternatives on how funding can continue to be provided to support CACs throughout the state.

Does the Chapter have a good working relationship with the state agency that allocated grant funding will flow through/from?

While a Chapter is often not afforded the opportunity to weigh in on which agency its funding will flow through, it might be wise to begin identifying agencies the Chapter would *want* to partner with (and perhaps those it would *not* want to partner with), so that the Chapter is prepared in the event such an opportunity does arise. Some points to contemplate might include whether there are any inherent conflicts of interest with certain agencies or if certain agencies have a reputation with other grantees of being difficult to work with, routinely see turnover in their leadership ranks, or tend to come under frequent fire from the state legislature.

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Does the Chapter have prior history with the funding agency and its current leadership? (If yes, is that history positive or negative?)

Whether the Chapter has any control over which agency it will be contracting with or not, it will be important to assess the history and level of relationship the Chapter has with that agency and develop a plan for building and/or strengthening the Chapter's relationship with agency leadership as well as the specific agency staff who they will be directly working with on grant administration activities. If the Chapter has little or no relationship with the agency, reach out to other organizations that might currently receive funding through that agency to explore their experience, invite suggestions or tips, etc. Regardless, ongoing and intentional relationship building with the agency you will partner with is critical in mitigating potential conflicts in both the short and the long term.

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Risk Management

Item	Yes	No	Don't Know
Do member centers have the capacity to effectively manage the grant funding they would receive through this initiative?			
Will the Chapter require that centers have additional or different kinds of insurance to protect the Chapter from potential legal or financial liability?			
Is the Chapter clear on its culpability (financial and otherwise) in the event a member CAC breaches its contract?			
Do any of the Chapter's current activities with or services for member centers pose conflicts with its role as a funding contractor?			

Do member centers have the capacity to effectively manage the grant funding they would receive through this initiative?

If the grant funding the Chapter will be administering is “new money” that member centers have not been receiving previously, or if it represents a significant increase in funding for the centers, the Chapter should explore and assess the member centers’ ability to appropriately spend and manage these funds. Do most of the centers have staff with financial and/or grant expertise who can effectively oversee the recordkeeping, documentation, and reporting that will be required as part of their funding contracts? If not, the Chapter may need to explore making member center training available to staff so the centers are equipped to maintain full compliance with their contracts.

Will the Chapter require that centers have additional or different kinds of insurance to protect the Chapter from potential legal or financial liability?

It is recommended that member centers be required to demonstrate they have adequate insurance protection related to the required activities identified within their subcontracts and that the Chapter’s liability is mitigated to the greatest extent possible. In addition to maintaining the more standard types of insurance policies such as Directors and Officers, Professional, General Commercial, and Cyber Liability policies, centers may also need to have additional protections in place (e.g., Fidelity or Employee Dishonesty Bonds). The Chapter should also consider requiring that all

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center insurance policies include a waiver of subrogation in favor of the Chapter, further protecting the Chapter in its contractor/subcontractor relationship with the centers. Requirements related to the types and limits of center insurance coverage should be clearly stated in funding contracts. Legal and insurance professionals should be consulted to determine what types and limits of insurance protection the Chapter and the centers should be required to have in place.

Is the Chapter clear on its culpability (financial and otherwise) in the event a member CAC breaches its contract?

Ensuring the Chapter has clarity regarding its own level of culpability and liability in the event a member CAC breaches its contract is critically important. Language in the subcontracts must directly address this, and member centers (especially their boards or governing entities) must have a clear understanding of their responsibilities in this regard (e.g., refunding monies that may have been spent on unallowable activities).

Do any of the Chapter's current activities with or services for member centers pose conflicts with its role as a funding contractor?

Laws related to contract relationships and legal liabilities may vary from state to state and are highly complex. The Chapter's level of responsibility and risk—in the contractor/subcontractor relationship with its centers—may also be impacted by how it interacts with and supports member centers in areas as seemingly innocuous as its approach to delivery of technical assistance. Therefore, a Chapter should seek specialized consultation from legal professionals with expertise in the contract arena to inform contract language to mitigate undue risks to the Chapter. It will be important to ensure that the consultants the Chapter engages with have a full understanding of the Chapter's broader relationship and work with the member centers—beyond the funding contractor relationship—so the consultants can provide the Chapter with accurate and relevant recommendations about liability protections.

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Item	Yes	No	Don't Know
Has the Chapter board discussed and reached consensus related to risk tolerance specific to grant administration activities?			
Will the Chapter board play a role in approving funding decisions and/or execution of grant contracts with member centers?			
Do member center executive directors or other center representatives currently serve on the governing board of the Chapter? If so, what potential conflicts of interest might this pose and how might they be managed?			

Has the Chapter board discussed and reached consensus related to risk tolerance specific to grant administration activities?

The Chapter's governing board of directors should be comprehensively informed and integrally involved in determining whether the Chapter can and should move forward if presented with the opportunity to administer grant funding. The board is the entity that is responsible for setting and achieving the mission of the Chapter and, therefore, has responsibility for ensuring that Chapter activities are consistent with that mission and purpose. In addition, the board holds all fiscal and legal responsibility and liability for the Chapter. Therefore, it is the board that must establish the Chapter's level of risk tolerance before it commits to take on the role of grant administrator. The board should play an active role in identifying what questions need to be asked and answered and what resources the Chapter might need to determine *if* they will move forward and, if so, what protections need to be put in place to protect the Chapter and its membership.

Will the Chapter board play a role in approving funding decisions and/or execution of grant contracts with member centers?

The answer to this question may lie in the requirements and expectations of the funding source or agency. However, there may be an opportunity to influence what this arrangement looks like. Regardless, it is critical for there to be full transparency and clarity around what the role of the board can and will be, so that an accurate assessment of responsibility and liability can be conducted.

Do member center executive directors or other center representatives currently serve on the governing board of the Chapter? If so, what potential conflicts of interest might this pose and how might they be managed?

If the Chapter board of directors comprises—totally or in part—member center directors or other representatives, it will be important to examine potential conflicts of interest and conflicts of loyalty. Because member centers are/will be the direct recipients of funding that is being administered by the Chapter, clear boundaries around decision-making related to award amounts, funding formulas, contracts, etc. must be enacted in order to eliminate the possibility, or even the perception, of a conflict. At a minimum, enactment of appropriate voting abstention requirements from all decision-making and voting pertaining to the grant administration activity would be in order.

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Evaluating Readiness

Revisit your readiness checklists. In general, items checked “yes” indicate areas of readiness, and items checked “no” or “don’t know” indicate you may have work to do. However, many of the questions are designed to raise awareness about what to take into consideration, and a “no” or “don’t know” may just indicate a structural dynamic to be aware of as you assess and move forward. This list is not intended to be exhaustive. There are too many other variables to consider that may impact your Chapter’s decision as to whether to pursue this initiative.

You may be wondering if there are any deal breakers—questions that, if answered “no,” mean you should not undertake this initiative at this time. There is no standard answer to this question. There is significant variance in the dynamics at play from Chapter to Chapter—funding, current capacity and expertise, levels of risk tolerance, funding partnerships, roles and relationships with member centers, and external stakeholders. Because of this variance, the questions at the end of this guide are intended to assist you in thoughtful reflection around what impact, if any, your “no” and “don’t know” answers might have on your decision.

If you have only one or two “no” or “don’t know” answers, your Chapter may decide to proceed with taking on grant administration and work to address these items along the way. If you have several “no” and “don’t know” answers, it may be wise to delay taking on this role at this time. Developing a two- to three-year work plan that will prepare your Chapter to undertake this initiative in the future is a wise, strategic decision.

Remember, your Regional CAC is here to help. If you have questions about any of the items listed, call your Regional CAC.

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1. As we reflect on our answers to the readiness checklists, what strengths do we have that will contribute to the success of this initiative? What will be our areas of challenge?

2. What other information do we need to make a decision about moving forward with this initiative?

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3. How will we make the decision about whether or not to move forward with this initiative? Who needs to be involved in the decision-making process? (Important constituencies to consider should include your board of directors, membership, the staff of the Chapter, and entities responsible for allocating funding [legislative bodies, state agencies, etc.])

4. How will we communicate the decision to our various stakeholders once it has been made?

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Proceeding with the Initiative

If the Chapter has decided to proceed with this initiative, below is a suggested preliminary process for getting started:

1. Build your team.

Depending on where you are at in the development process and how much time you have been afforded to develop your strategy and processes (sometimes with government grant funding, this can be a very short and non-negotiable window), you will want to identify who needs to be included in the process and at what stage and what level. At a minimum you will want representation from your board of directors and from your membership involved. It is highly likely that you will also need and want to retain legal, fiscal, and risk management professionals to help assess options and guide processes.

When recruiting individuals from the board to be directly involved at this stage, include board leadership but also recruit members who might have professional expertise and experience or close contacts in the areas of contract law, finance and grants, risk management, etc.

When recruiting individuals from membership to be directly involved at this stage, it will be important for these individuals be representative of the diversity of CACs within your state. Think about the variations in budget, staff size, and caseloads; consider smaller rural communities as well as mid-size and suburban and urban communities. Each of these may have different issues and concerns that will need to be explored and taken into consideration. CAC representatives who have extensive experience with securing and successfully managing government grants, as well as experience or history with the state agency that the Chapter expects to be partnering with, can also be enormously helpful.

2. Explore the increased liability this might pose for your Chapter.

Working with the legal, financial, and risk management experts you have identified, it will be important to evaluate the Chapter's structure, capacity, and current relationship with member centers. You will also need to determine what the impact of establishing a contractor/subcontractor relationship with member centers might entail and how it will impact relationships as a membership association.

3. Engage in negotiations with the funding agency.

To the greatest extent possible, establish an open line of communication with the state funding agency with which the Chapter will be partnering. Consider different levels of contact and communication—with the agency leadership as well as with those departments and individuals you will be working directly with you on the grant administration. Determine what aspects of the relationship and the pending contract are negotiable and establish a mechanism and a timetable for exploring those issues thoroughly.

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4. Assess fiscal competency to undertake the initiative.

Honestly and critically assess your Chapter's current level(s) of fiscal competency and identify areas in need of bolstering. Explore options for resources, training, etc. that your Chapter can and should access for varying levels of staff as well as member centers.

5. Communicate openly with member centers.

Throughout the assessment process and, assuming the Chapter opts to move forward, transparency and open communication with membership will be crucial. Taking on the role of grant administration for member centers has much at stake for the Chapter, but also much at stake for the centers. Therefore, setting up meetings and having frank dialogue throughout the process will be critical. This may be one of those circumstances where it would behoove the Chapter director/staff to get out into the field, in person, and meet with center directors and representatives from their local boards of directors (or governing agencies) to have frank conversations about the upcoming opportunities and challenges this initiative will likely present. If meeting individually with centers is not a realistic option, consider small-group, regional meetings where open, honest, and inclusive conversations can be conducted.

6. Develop documents, processes for all grant management activity between the Chapter and the funding agency.

Develop a timeline and strategy for creating processes that cover:

- Determining funding allocation processes, amounts, frequency of payments, etc.
- Sharing Chapter plans, processes or use with subcontracting member centers
- Developing, reviewing, executing contracts
- Reporting requirements, methods, etc.
- Establishing reimbursement request processes (if applicable), documentation, scheduling, etc.
- Monitoring processes, formats, schedules, etc.

7. Develop documents, processes for all grant management activity between the Chapter and member centers.

Develop a timeline and strategy for creating processes that cover:

- Determining funding eligibility guidelines
- Determining funding allocation processes and amounts
- Establishing grant application/funding request solicitation, submissions, review, approval/denial, etc.
- Developing, reviewing, executing contracts
- Reporting requirements for grants, methods, etc.
- Establishing reimbursement request processes (if applicable), documentation, etc.
- Monitoring processes, schedules, etc.

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As a reminder, this guide is meant to provide an assessment of when or if to engage in administration of government grant funds to member centers. While the steps above can be a helpful guide to get started, this is not intended to be a how-to guide. We recommend creating a comprehensive plan before diving into the initiative. Remember, you can always reach out to your Regional CAC for support.

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