COURSE SYLLABUS

Federal Grant Management Ethics Course (Self-Paced)

This course gives federal grant professionals a practical understanding of ethics in grant management, focusing on ethical risk, conflicts of interest, and protecting program integrity across the grant lifecycle.

Group classes (Live Online) and onsite training are available for this course. For more information, email onsite@graduateschool.edu or visit: https://www.graduateschool.edu/courses/federal-grant-management-ethics-course-self-paced



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Course Outline

Module 1: Federal Ethics Foundation — Why It Matters

- Define the purpose of the federal ethics framework and why it exists to prevent conflicts, promote impartiality, and protect public trust.
- Explain the role of the Office of Government Ethics (OGE) and how executive-branch ethics programs are structured.
- Connect core federal ethics standards (5 CFR Parts 2638 and 2635) to day-to-day grant, procurement, and oversight decisions.
- Apply prevention-focused ethics thinking using a case-based exercise to identify risk before misconduct occurs.

Module 2: Federal Ethics Framework Governing Grants

- Identify the major ethics authorities that influence grant management (statutory, regulatory, and programmatic).
- Explain how ethics requirements are embedded in grant administration rules, especially 2 CFR Part 200.
- Recognize overlapping ethics obligations for recipients, pass-through entities, and subrecipients.
- Map common grant scenarios to ethics-related regulatory requirements (conflicts of interest, procurement integrity, internal controls, and monitoring).

Module 3: Conflicts of Interest — The Most Common Ethics Failure

- Distinguish between actual, apparent, and perceived conflicts of interest and why appearance matters in federally funded programs.
- Apply conflict-of-interest rules across procurement, subawards, hiring, and governance decisions.
- Determine when disclosure alone is insufficient and when additional mitigation (recusal, reassignment, independent review) is required.
- Analyze a multi-part case scenario to identify conflict types and select defensible mitigation steps aligned to grant requirements.

Module 4: Ethical Risk Across the Grant Lifecycle

- Identify ethical risks by phase: pre-award (misrepresentation, inflated budgets, undisclosed relationships), post-award (allowability shortcuts, time and effort issues, vendor steering), and closeout (cost shifting, retroactive documentation, suppressed findings).
- Explain how ethical risk evolves and compounds under operational pressure during implementation.
- Link ethics failures to internal control weaknesses and distinguish preventive, detective, and corrective control breakdowns.
- Work through a lifecycle case exercise to recognize phase-specific risks and the control gaps that allow escalation.

Module 5: Ethical Decision-Making, Reporting, and Escalation Under Pressure

- Apply ethical reasoning frameworks to grant decisions when time, performance, and leadership pressure increase risk.
- Recognize common rationalizations that precede ethical breakdowns (for example, “just this once” and “we’ll fix it later”).
- Identify when concerns must be escalated beyond routine decision-making and why delayed action increases exposure.
- Select appropriate internal and external reporting channels and document concerns in a clear, objective, defensible manner.

Module 6: Building an Ethical Grant Management Culture

- Define what ethical culture looks like in grant operations and how it is reinforced through systems and leadership behavior.
- Operationalize ethics by embedding expectations into budgeting, procurement, subrecipient monitoring, reporting, and closeout workflows.
- Align ethics with internal controls and monitoring to identify patterns of risk before they become findings.
- Use an applied match-the-term activity to connect ethics concepts to practical grant management behaviors and controls.

Module 7: Course Wrap-Up and Practical Takeaways

- Summarize how ethics failures are often predictable and preventable through early risk recognition and consistent safeguards.
- Explain how small exceptions can escalate into audit findings, questioned costs, or enforcement actions if normalized.
- Reinforce documentation as ethical protection and a core element of audit readiness.
- Complete a reflection exercise to identify a priority ethical risk and commit to a concrete action for improvement.