COURSE SYLLABUS

Federal Grant Management Ethics Course

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



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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.