

Module 2.2 - Data Privacy and Technology in Federal Grant Management

Technology plays a critical role in modern federal grant management, from data collection and payments to reporting and subrecipient oversight. Ethical use of technology ensures transparency, accountability, fairness, and compliance with federal regulations—including 2 CFR 200. This one-pager outlines the key principles organizations should follow when integrating technology into their grant processes.

1. Protecting Sensitive Grant Data

Organizations must safeguard financial, programmatic, participant, and subrecipient data. Access should be limited to authorized personnel, stored securely, and protected in accordance with federal and organizational data privacy requirements.

2. Ensuring Integrity of Electronic Grant Records

Digital systems must maintain **accurate, complete, and auditable** records for procurement, payments, time and effort, performance, and financial reporting. Electronic modifications should be traceable and protected from tampering.

3. Cybersecurity Responsibilities

Strong cybersecurity practices protect grant data from breaches, unauthorized access, and manipulation. This includes multi-factor authentication, password controls, regular updates, and adherence to organizational IT security protocols.

4. Transparency in Digital Grant Systems

All digital processes used for grant management, such as e-timesheets, procurement platforms, and subrecipient portals, must be transparent. Organizations should document system workflows, data flows, and control points to ensure accountability.

5. Preventing Conflicts of Interest in Technology Procurement

Procurement of software, IT tools, or systems used for grant management must follow competitive procurement standards. Staff must avoid favoritism and disclose any potential conflicts of interest.

6. Ensuring Equitable Access for Grant Stakeholders

Technology should be used in a way that does not disadvantage small organizations, rural subrecipients, individuals with limited digital literacy, or underserved communities. Accessibility and equity must be central to digital grant operations.