

YUMA COUNTY

GRANTS MANAGEMENT HANDBOOK



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PREFACE

The Yuma County Grants Management Handbook is prepared by the Grants Oversight Committee to address the County policies, federal laws and regulations, and other relevant information pertaining to the overall grant application, award acceptance and grant management processes for County Departments and Agencies. The Grants Management Policy adopted by the Board of Supervisors is included as an Exhibit in the Handbook. The Handbook will be reviewed and updated on an annual basis.

DISCLAIMER

This handbook is not intended to be an exhaustive listing of all rules, regulations, or laws relating to grants administration, but is a guide of standardized policies and procedures to direct County personnel in the pursuit and administration of grant funds. All departments and agencies are responsible for the creation and maintenance of internal procedures that will be use in conjunction with these County-wide standards.

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CHAPTER 1: PURPOSE, DEFINITION, AND AUTHORITY

1.1 PURPOSE

The purpose of the Grants Management Handbook is to establish uniform guidance, procedures, and clarity of the County's position regarding application, acceptance, budgeting, and administration of Yuma County grants when the County is the grantee. This Handbook is not a comprehensive listing of all rules, regulations, and laws relating to grants management but simply a guide of standardized policies and procedures adopted by the Yuma County Board of Supervisors. Adherence to the procedures outlined within the Handbook will promote efficiency, improve transparency, greater accountability, a strategic approach to funding opportunities, and generally place the County in a more competitive position for securing future grant funds.

In accordance with ARS §11-201, the Board of Supervisors is the only entity that has the authority to incur financial, legal, and other obligations on behalf of the County, its agencies, and elected officials. Therefore all departments and agencies are required to follow the adopted Grants Management Policy (attached as Exhibit A).

The County encourages its agencies and departments to seek grant funds to reduce the County taxpayers' burden and to provide services the Board of Supervisors has determined to be beneficial to the citizens of Yuma County. All County Agencies and Departments are subject to the policies and procedures within this Handbook. The Handbook pertains to the Grants Management Policy and Procedures for Yuma County associated with:

- Alignment of Grants to the County's Strategic Plan
- Grant Authorization Levels
- Grant Development
- Grant Award Notification, Review, and Acceptance
- Grant Oversight and Monitoring
- Grant Accounting and Reporting
- Grant Closeout
- Grant Audit and Retention Requirements

1.2 DEFINITION OF A GRANT

For the purposes of Yuma County, a **grant** is defined as **financial assistance awarded to the County from an external entity to carry out a public purpose of support or stimulation, or when specifically identified by the awarding agency as a "GRANT" at the time of award.** A grant can be defined in but is not exclusive to the following forms:

- Loan Contract
- Loan Guarantees



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- Intergovernmental Agreement
- Contractual Agreement
- Joint Participation Agreement
- Cooperative Agreement
- Private Contribution

A grant can be restricted or unrestricted to be used by the recipient in any manner within the parameters of the recipient organization's activities or for a specific purpose by the Grantor. A grant from the Federal Government will retain its character and will not lose its identity even when it is passed through the State. County agencies and departments must ensure all Federal regulations are followed throughout the grant period. Where there are discrepancies between Federal, State, and local requirements during implementation of the grant, staff must follow the most stringent of the rules and regulations.

1.3 GRANT TYPES

Formula Grants

This is a federal categorical grants distributed according to a formula specified in legislation or in administrative regulations. Grantees are not required to compete for formula funds, although grantees are required to complete grant applications and comply with other grant requirements in order to ensure that grant funds are expended in accordance with the defined purpose and goals of the grant program. Formula grants are narrower in scope in comparison to block grants and are distributed on a project-by-project basis.

Discretionary Grants

Unlike a formula grant, a discretionary grant awards funds on the basis of a competitive process. The Grantor reviews applications, in part through a formal review process, in light of the legislative and regulatory requirements and published selection criteria established for a program.

Block Grants

A broad intergovernmental transfer of funds or other assets by the U.S. Congress to state or local governments for specific activities such as secondary education or health services, but with few restrictions attached. Block grants are distributed according to legal formulas defining broad functional areas such as health, income security, education, or transportation. They are used for a variety of activities, largely at the recipient's discretion and can include a wide range of government programs under one funding umbrella.

Continuation Grant

A continuation grant provides additional funding for budget periods subsequent to the initial budget period, also referred to as a Renewal Grant.



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Cooperative Agreements and Contracts

A type of grant assistance awarded by a federal agency when it anticipates having substantial involvement with the grantee during the performance of a funded project.

Corporate Grants

A grant made by a corporation.

Foundation Grants

A grant made by a philanthropic foundation.

Pass Through Grant

Grant funds received from one grantor, but passed through another grantor or funding source.

Renewal Grant

A renewal grant provides additional funding for budget periods subsequent to the initial budget period (Also referred to as a Continuation Grant.)

1.4 GOVERNING LAWS AND REGULATIONS

Federal

- Federal Grant and Cooperative Agreement Act of 1977, as incorporated in Title 31 Section 6304 of the U.S. Code.
- 2 CFR Chapter I, and Chapter II, Parts 200, 215, 220, 225, and 230 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for federal Awards (a.k.a. the “Omni Circular”).
- Single Audit Act of 1984 as amended in 1996.
- OMB Circular A-133 and compliance supplements.

1.5 UPDATES AND REVISIONS

This Grants Management Handbook was developed by the Grants Oversight Committee (formed under the direction of the County Administrator) and reviewed by all County agencies and departments. The Handbook is a living document and contains federal, state, and County policies and procedures that by its nature may be revised over time as regulations change, new tools emerge, new processes are designed, and risks change. The Grants Oversight Committee (GOC) will annually review the policies and procedures described herein and update the document as necessary or circumstances dictate. Any modifications or exceptions to the procedures and process within this Handbook can be made through the recommendation of the Grants Oversight Committee with the approval of the County Administrator. Only the County Board of Supervisors has the authority to waive any exceptions to the “Grants Management Policy” itself. (Exhibit “A”)



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CHAPTER 2: ROLES AND RESPONSIBILITIES

All County personnel engaged in preparing grant proposals and administering grant awards or responsible for grant funded assets serve an important role in the success of project outcomes and objectives and ensuring that all grant terms and conditions and budgetary and regulatory requirements are met.

Below are the “key players” in the management and administration of grant funded projects received by the County and a representational list of the responsibilities.

Board of Supervisors: The Board of Supervisors has the authority to set policies and budgets.

County Administrator: The County Administrator is the “Government Business POC” and authorized to sign all federal applications on behalf of the County within grants.gov portal. County Administrator also has the authority to grant waivers to the grant process and procedures within the Grants Management Handbook.

Grants Oversight Committee: The Committee is composed of personnel from County Administration, Office of Management and Budget, Finance, County Attorney’s Office, Health Department and Human Resources. The Grants Oversight Committee was created by the County Administrator to assist in ensuring the overall management of grant contracts/agreements is in compliance with all regulatory requirements and in alignment with the County’s strategic plan, policies and goals. The Committee will advise the County Administrator who, in turn, advice the Board of Supervisors.

Finance Department: The Finance Department is responsible for the official financial records for the County and in that capacity is responsible for maintaining adequate records to ensure compliance with federal and state accounting and auditing standards.

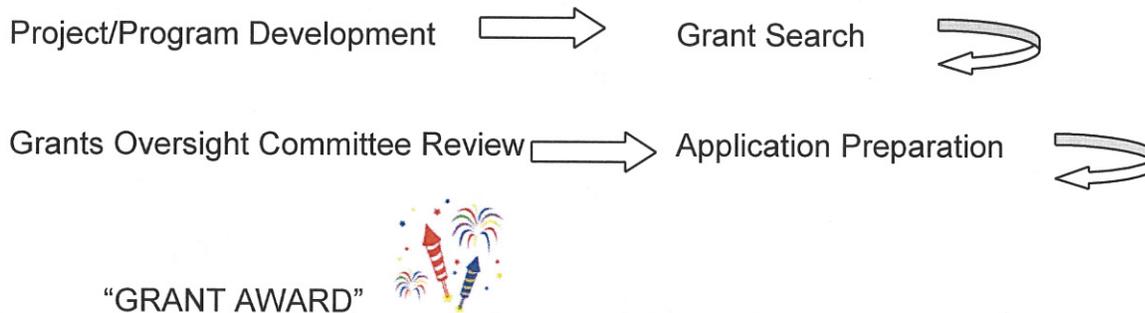
Administration Grants Division: The Grants Division under the County Administrator provides support services to all County departments and agencies and provides training, technical assistance, and professional development to grant professionals in the County departments and agencies responsible for grant search and grant project management duties. The Grants Division manages the County’s sam.gov and grants.gov site registration and role assignment. The Grants Division also oversees the management of the Data Universal Number System (DUNS) number and the assignment of authority within SAM.GOV, the federal system for award management, for County personnel.



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CHAPTER 3: GRANT PRE-AWARD PROCESS

The pre-award process involves all the steps from project development to submitting a grant proposal to a Grantor. In some cases, the pre-award process may take years depending on the complexity of the project. Organizations that are successful with obtaining funds for their projects are cognizant of the fact that you should never chase the dollar when it comes to grants. A project that is not well developed will often fail even if the proposal is awarded for funding.



3.1 PROJECT/PROGRAM DEVELOPMENT

A grant project or program should be well defined prior to seeking grant funds. In general, projects should align with the County’s and/or the departments/agencies strategic plan or in support of County functions. The project should be well thought out prior to seeking grant funds. Developing a project/program concept can sometimes take years, especially if outside partnerships are needed for a comprehensive program. Once a Notice of Funding Availability (NOFA) is posted, the typical timeframe for application submission is between 8-12 weeks. A well thought out project/program will reduce the stress of preparing a grant application when funding is made available. The following are some questions to consider on developing a project:

- Is the project/program temporary or permanent?
- If it’s permanent, is there funding to support the project/program once the grant expires?
- What is the goal or end product?
- Are the goals and objectives achievable and measurable?
- What are the steps necessary to achieve end results?
- Have similar projects/programs been done before by another agency?
- If needed, are there any existing funds or programs that can be utilized as leveraging or matching?
- Will additional staff be needed to support the project/program? If so, will the grant support the position, or will the position be requested as part of the County budget?



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- Will the project/program require outside partnership? If so, has the organization been contacted for interest? Is there an agreement in place with the partners?
- What is the anticipated project/program cost?
- Will the grant cost more to implement than it is worth?

When possible and if potential funding is identified, it is best to prepare the application ahead of time in anticipation of the NOFA. This is especially true for those NOFA's that are likely to recur every year.

3.2 GRANT SEARCH

There are thousands of grants available in the United States. Grants can come from all different sources, federal, state, foundations, and private philanthropy. No matter the source of the grant, the commonality is the grant has to meet the objectives of the grant source. The best resources in searching for funding are through competitors and colleagues. Aside from networking, the following are the most common resources to search for grant funds:

LISTSERVS: Most federal and state agencies have website listservs to which interested parties can subscribe to receive the latest grant opportunities and information that pertain to their department's/agency's operation. Simply visit the respective federal or state agency grant office website and subscribe for notification of funding availability.

GRANTS.GOV: Grants.gov is a clearinghouse for all federal grant opportunities. Most federal agencies also require grant applications be submitted through this portal. Be cognizant of the fact that problems can arise when submitting a grant application electronically. Applicants are urged to submit its application at least 72 hours prior to the due date to allow time to receive validation messages or rejection notifications from Grants.gov. Application errors may take more than a day for issues to be resolved for submission. Only recognized Authorized Organization Representative "AOR" can submit applications through this portal.

ECivis Grant Management System: A third party web-based subscription purchased by the County as the County's Grant Management system. The system provides users a comprehensive method of managing grant projects from grant search to managing a grant contract from beginning to end.

Foundation Center: This is a resource available at the Main Library and is the most comprehensive listing of grants available to nonprofits. Do not discount this resource because some foundation grants are available to even public sectors if the project/program is aimed at achieving the objectives of the grant. The Main Library also has many books on grant writing skills.



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3.3 GRANTS OVERSIGHT COMMITTEE REVIEW

The Grant Oversight Committee (GOC) is composed of relevant staff from County Administration, Office of Budget and Management, Finance, County Attorney's Office, Human Resource, Health Department and Grants Office. The goal of the Grant Oversight Committee is to provide guidance, direction, and training to grant staff to minimize the County's exposure to unforeseen problems or liabilities. The Grants Oversight Committee will be responsible for the following:

- Review and update of the Grants Management Handbook
- Maintain internal control and operational efficiency to ensure budget and audit compliance.
- Grant application review to ensure alignment with County's strategic goals and mission.
- Streamline internal grant process and procedures
- Provide grant writing and administration professional development training
- Technical support

County departments and agencies will be required to submit notification of proposed non-recurring grant applications to the Grants Oversight Committee for review prior to submission by completing the Grant Oversight Review Form (Exhibit B). It is preferable that the proposed application is submitted a minimum of six (6) weeks in advance of the application due date. This will enable the Committee time to review and provide comments to the applicant department/agency and recommendations to the County Administrator and the Board of Supervisors. Each grant proposal will be reviewed and analyzed for the following considerations:

- a. Financial
 - Total anticipated project cost
 - Matching requirements and sources
 - Project income considerations
 - Staffing requirements
 - Cash flow needs
 - A continuation plan for sustaining program after expiration of grant funds (if applicable)
- b. Programmatic
 - Alignment with County Strategic priorities and department's mission
 - Provision or expansion of services to address critical needs and core services
 - Staff capacity and expertise to administer the financial and administrative aspects of the grant **(Demonstration of capacity is based on the number of internal and external training attended by the grant staff within the department or agency.)**
 - Consideration of potentially political or conflict issues



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3.4 APPLICATION PREPARATION

Preparing a grant application is primarily the responsibility of each department. The County Administration Grants Office is available to provide technical support and assist with the preparation of the application. If assistance is needed, contact the Grants Office early to ensure proper planning.

A. Electronic proposal preparation and submission has become the norm for grants. Yuma County Finance Department is in charge of the critical registration for the County such as sam.gov (System for Award Management). To avoid duplication, Departments/Agencies should contact either the Finance Department or the Administration Grants Office for confirmation prior to registering in any grants portal. Do not wait until the date of application submission to register in electronic portals if the application must be submitted digitally. It is important that the appropriate programmatic and fiscal personnel are established within these systems for access and award management. The following are examples of some common portals:

- The System for Award Management (sam.gov)
- Grants.gov
- The Automated Standard Application for Payment (ASAP)
- DOJ Grants Management System (GMS)
- eRA Commons
- Department of Energy Performance and Accountability (PAGE)
- FEMA eGrants and PARS (Payment and Reporting System)
- National Oceanic and Atmospheric Administration (NOAA)

B. There are some typical identification numbers you will need to know to complete applications documents:

- County EIN Number: 86-6000567
- County DUNS Number: 074463811-0000 (Some Departments have elected to use a separate number. Consult with Finance Department for the appropriate number. The last 4 zeros are for grants.gov application.)
- SAM.gov Number: 074463811 / 5EWA5

C. Once a Notice of Funding Availability (NOFA) or Funding Opportunity Announcement (FOA) has been identified for a proposed project/program, the most important thing is to read the entire NOFA or FOA as soon as possible. Keep in mind that you will be re-reading the NOFA or FOA a few times prior to submitting the application. Things to identify up front before starting the preparation are as follows:

- Grantee eligibility
- Funding goals, priorities, and ceilings



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- Letter of intent (if applicable)
- Submission deadline
- Matching requirements
- Letters of support or commitment
- Partnership requirements
- Project Feasibility or Engineering Report Requirement
- Grantor point of contact

One or more of the above items can help determine if the grant is feasible or not. It is recommended that an Agency/Department not waste time on applying for a grant if there is not sufficient time to prepare a good proposal. Good projects/programs are rejected all the time by grantors for incomplete or ineligible applications.

Some grant applications, especially federal grants, require a lot of preparation. For large grant proposals, the best method for preparation is to form a team. The team concept not only provides staff buy-in to the project but also facilitates brain storming sessions that identify possible project alternatives to create a better proposal. The letters of support or commitment require time to make the necessary contacts and follow up. Dividing up the proposal preparation will reduce the stress level for the lead person on the application.

If the Grants Oversight Committee (GOC) has not been informed of the project, the initiating department must complete the "Grants Oversight Review Form" and submit it to the GOC as soon as possible. The initiating department should continue to prepare the application during GOC review period. The GOC will convey the committee's comments after completion of the review. The comments will also be forwarded to the County Administrator and the Department Head for the initiating department.

Whenever possible, allow 3-5 days prior to the application deadline for unforeseen problems, especially electronic submission.

Most grant writers start a proposal by compiling the grant budget first. The reasoning is that the clearer the budget is for a project, the easier it is to outline in the narrative portion of the proposal. For example: If a full time employee is needed to run the project or program, there should be a clear justification within the proposal as to what that person will be doing under the grant funded program. In addition to the budget, established goals and objectives (or metrics) is crucial prior to writing the narrative. Writing a strong narrative for your proposal is dependent on knowing the projected outcome if your proposal is awarded by the Grantor.

The most time consuming and frustrating portion of any grant proposal is gathering letters of support or commitment. Applicants should start gathering these letters as soon as a decision is made to submit an application for funding. The best method to get quick response from agencies or elected officials to provide the needed letter of support



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or commitment is to draft a sample letter for them to modify or incorporate the language into their letters. Once they have given you a positive response, be sure to follow up and chase the letter down.

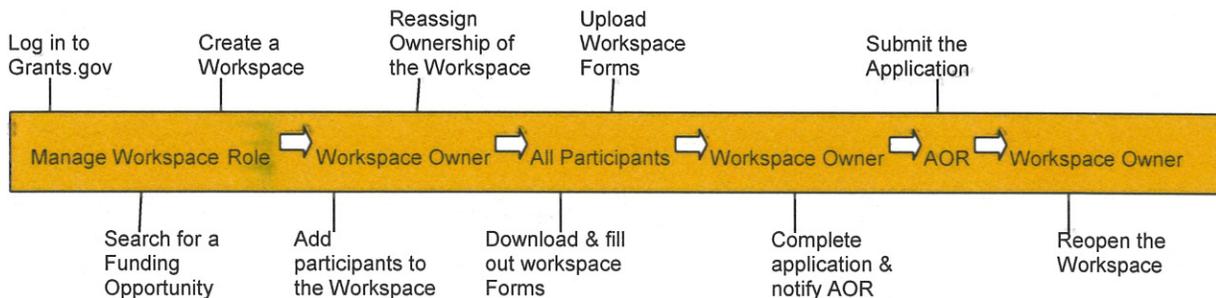
If a federal grant is being considered, keep in mind the federal government has stringent principals on how grant funds can be spent and managed by grantees. Super circular Title 2 CFR 200 is the “Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Award.” Its policies went into effect for grants awarded after December 26, 2014. Also pay close attention to the Notice of Funding for guidance as to what is an eligible cost under the grant.

Refer to Board of Supervisors’ grant policy regarding signature authorization level. Although Department Heads are given authority to sign grant applications, some grantors required approval from the Board of Supervisors as part of the grant application. Therefore, a Board of Supervisors meeting may need to be included as part of the grant planning process.

If unsuccessful in being awarded the grant, contact the grantor for a debriefing. Granting agencies routinely provide review comments or telephone debriefings for proposals they do not award.

3.5 GRANTS.GOV PROCESS

Majority of federal grants are submitted through the grants.gov portal electronically. Grants.gov is converting their application process from the application package submission to the Workspace process. Workspace is a shared, online environment where members of the same organization may simultaneously access and edit different forms within an application. Starting in 2018 all grant submission must be done through the Workspace process. Once a funding opportunity has been identified within grants.gov, the project leader should become familiarize with the Workspace process in grants.gov website and request Finance Department (designated EBiz POC) to add the Authorized Organization Representative (AOR) and the Grants Division for assignment of the Workspace Owner roles thereby allowing the Workspace Owner to create the Workspace for the team. The Workspace workflow is as follows:





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CHAPTER 4: GRANT POST AWARD PROCESS

Congratulations! You are notified that your grant application was successful and being awarded, now what?

When the County, or any of its granting agencies or elected officials, receives a grant from an outside source, it generally incurs obligations. At a minimum, in accepting the grant, the County assumes the obligation of ensuring that the grant money is spent only for the specific purposes attached to the grant. In addition, there may be impacts to internal service departments, reporting obligations, compliance with nondiscrimination laws, indemnity and releases—all of which become County obligations upon receipt of the grant funds.

In addition to audit requirements, grantee should expect periodic programmatic reviews from the grantor agency. Following a program review, the grantee should expect a letter identifying the results of the review which address deficiencies and corrections. The grantee department/agency shall submit a copy of the program review letter to the GOC. This will enable the GOC to assist with trainings necessary to strengthen the grantee's grant management performance in the future.

4.1 AWARD NOTIFICATION, REVIEW, AND ACCEPTANCE PROCEDURES

Grant Agreements are legal contracts. It is the County's responsibility to carry out grant activities to accomplish its objectives, while adhering to the regulatory and budgetary terms and conditions prescribed by the grantor in the grant agreement. Failure to do so exposes the County to legal liability and compromises current and future grant funding. The County carries a significant legal and ethical responsibility when accepting grant funding, and management of grant awards requires heightened awareness throughout the organization.

It is the responsibility of the initiating department to review the contract or agreement, especially the scope of work, to ensure the department concurs with the language and conditions stipulated within the document. All contracts and agreements must be reviewed and approved by the Office of Budget and Management, Finance Department, County Attorney's Office, and County Administrator. If the grant has NOT been budgeted for the current fiscal year, the initiating department must submit a request to the Board of Supervisors for budget authority. The following are the two processes for grant contracts depending on budget authority:

- A. Budget authority already adopted by the Board of Supervisors for the current fiscal year – Complete the Grants Administrative Form (Exhibit C) and the Grant Review Form (Exhibit D) and submit them with the contract/agreement and all necessary documents to the Finance Department, attention Grant Auditor, for processing. The documents will be returned to the initiating department at the completion of all necessary approvals.



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- B. No or insufficient budgetary authority for the current fiscal year – Complete the Grants Review Form (Exhibit D) and the Budget Amendment Form(s) (Exhibit E) and submit them with contract/agreement and all necessary documents in Agenda Quick for the next available Board of Supervisors meeting for acceptance of the grant and increasing the department's budget to include the grant award. If the grant source is new and a fund number is needed, consult with the Finance Department.

- C. Additional Personnel Positions –Approval for new positions, even though grant funds, must come from the Board of Supervisors. If positions are approved as part-time, they cannot be combined with other part-time positions to create a benefit-eligible position. An exception can be made for fully grant-funded positions that receive no General Fund support, as long as the grant allows for the benefits and there is sufficient funding in the grant(s) to cover the cost of benefits. Information on the grant funded positions must be provided to Human Resources. The new hire must be notified prior to the start of employment that the position is grant funded and the position would be eliminated upon expiration of the grant.

4.2 PROJECT SET UP

Once the grant has been accepted and appropriated by the Board of Supervisors, the project must be set up in both the Oracle and the eCivis system.

ORACLE

ORACLE is the overall financial management system that handles all financial operational activities for the County from accounts payable to payrolls. Each grant is assigned individual account codes if separate funding tracking is required or if using the Grants module to record all operational transactions. Follow the Oracle training manual (Grants/Projects Accounting) in setting up the grant in the system.

eCivis Grant Management System

This is a third party subscription to assist County grant staff in better managing their grant contracts. The system provides staff the ability to search grant funding for a specific project. The grant project should already be registered in the system by the initiating department during the grant search and application stage. Once a grant has been awarded, the grant contract information needs to be keyed into the system. All grant contracts must be registered into the system for overall grant management and audit purposes.

4.3 GRANT BUDGETING AND ACCOUNTING

Grant funds must be properly received and managed by the County. Grant recipient departments/agencies are encouraged to contact the Office of Budget and Management



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for any budget questions and Finance Department for accounting questions. If there are any changes to the grant budget after adoption of the final budget for the fiscal year, Finance Department will process the necessary budget revisions to the general ledger (i.e. an overall increase or decrease in the agency's budget) upon Board of Supervisors approval.

Each grant budget is coded in Oracle so as to prevent the over expenditure of the grant and to ensure the grant budget is not used to support non-grant activities. All individual grant revenues and expenditures must be coded to their assigned Grant account codes. Grantees shall charge all expenditures directly to assigned grant account codes instead of charging grant related costs in other departmental account codes that subsequently require a transfer to the grant account code by journal entry.

4.3a Grants Crossing Fiscal Years

The County may accept multi-fiscal year grants. Keep in mind the County only budgets for one fiscal year (from July 1st to June 30th of the following year). For those grants that continue into the subsequent fiscal years, grantees are encouraged to estimate the remaining grant budget during the budget preparation period for those subsequent fiscal years. If the remaining grant funding at year-end has been incorrectly estimated, the Agency Head should prepare an Agenda Item Review (AIR) form and Budget Amendment Form form to reconcile the actual remaining grant budget with the adopted County budget. When multi-year grant agreements authorize the total grant allocation initially, the County will appropriate the same amount. If the grantor allocates funds for a multi-year grant in single program/fiscal year increments, then the County should also appropriate likewise. Subsequent fiscal year appropriations should agree with grantor allocations.

4.3b Fiscal Accountability

- No grant funds shall be disbursed until contracts are fully executed between grantor and grantee and the appropriation request has been approved by the County Board of Supervisors.
- Grant funds may only be used for grant related expenses and expended within the period of performance identified in the grant agreement.
- Departments receiving grant funds shall adhere to County policies and procedures regarding revenue collection and accounting and reporting of grants received by the County.
- Modifications or reallocations to the awarded budget that alters the grant amount or move funds from one budget line item to another must adhere to grantor and County policy and procedures.
- Grant funds awarded to the County shall not be used to supplant an existing expense so that current funds can be diverted to another use, unless such use of grants funds is explicitly identified as allowable in writing by the grantor in the grant award.



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- All income resulting from a grant funded project or program shall adhere to County revenue and grants policy and procedures, and managed and maintained as established in the grant agreement.
- All procurement activity associated with grant funded projects or programs shall follow grantor and County policy and procedures for procurement of goods. Where there is discrepancy between the two, always use the more stringent of the two policies.
- All grant and related matching revenues and expenditures shall be recorded in the Oracle grants accounting module.
- All County grant personnel responsible for generating a billing invoice shall attend an Oracle Event-Billing training to gain and retain the appropriate Oracle responsibility.
- All County grant personnel responsible for writing and/or administering grants shall attend a minimum of one grant training offered by the Grant Office.

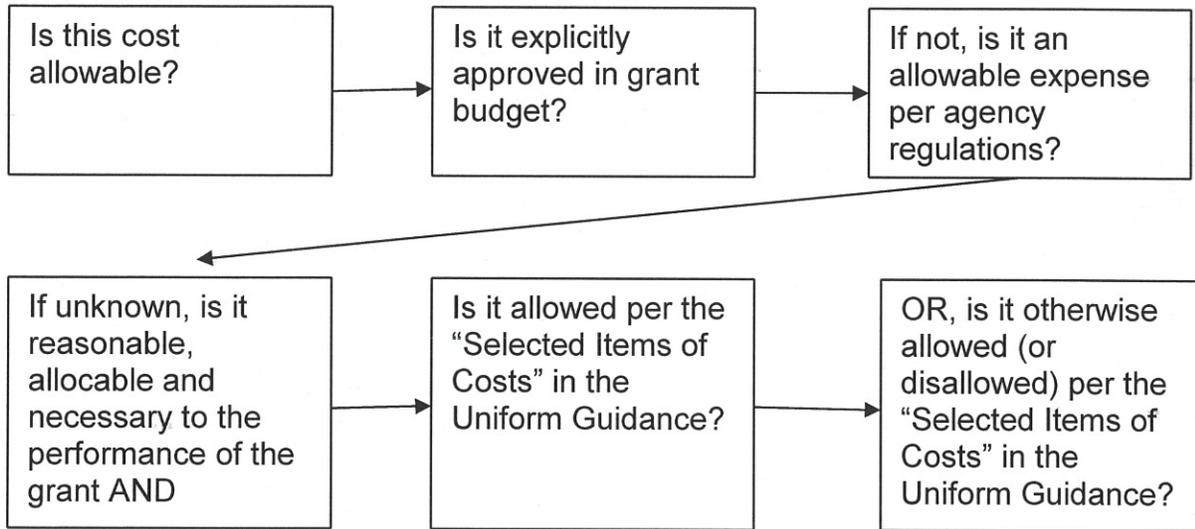
4.3c Allowable and Unallowable Costs

Allowable costs are those costs that fit the definition for authorized expenditures as stated in the applicable principles. Authorized expenditures comprise those expenditures that are:

- | | | |
|---|---|---|
| ✓ Allocable | ✓ Net of all applicable credits | ✓ Conforms to limits or exclusions on types or amounts of costs as stated in cost principles, federal laws, and terms and conditions of grant award |
| ✓ Reasonable and necessary | ✓ Not included as a cost or used to meet the matching requirement for another federal grant | ✓ Consistent with grantee policies, regulations, and procedures regarding federal awards |
| ✓ Treated consistently as a direct or indirect cost | ✓ Authorized under local laws | |
| ✓ Determined in accordance with Generally Accepted Accounting Principles (GAAP) | ✓ Well-documented | |



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4.3d Expenditure Monitoring/Award Reconciliation

- A. It is critical to the overall success of a project that grant funds are expended accurately. After initial setup, grant awards should be monitored on a regular basis to ensure:
 - Expenditures are allowable, allocable, necessary, and reasonable based on terms and conditions of the grant award.
 - Expenditures are adequately supported by documentation.
 - Expenditures are charged to the correct project.
 - Award spending is commensurate with the project timeframe.
- B. Incorrectly posted charges to grant funded projects must be fixed within regulated time constraints, which is why routine account reconciliation is critical. Failure to transfer incorrectly posted charges in a timely manner may result in the expense being disallowed for grant reimbursement. Notify Finance Department as soon as the incorrect posted charges are noted.
- C. For grant awards on a reimbursement basis, a request for payment should be submitted to the grantor no less than on a monthly basis.
- D. It is important that grant budgets (revenues and expenditures) are reconciled on a regular basis but more importantly, at the end of each fiscal year. The revenues and expenditures for each grant contract must be reconciled prior to the closing of a grant contract.

4.3e Program Generated Income

Program income (PGI) means gross income received by the grantee or sub-grantee directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period. It is important that PGI be anticipated and disclosed in the grant proposal budget, which should include a plan for utilization that identifies the method of use. However, some grantors do not allow PGI to be re-invested in the project. Consult with the grantor during application preparation if PGI is anticipated.



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during the project. All PGI must be accounted for during the performance period of the award and be reported per the method of utilization approved by the grantor. Notify Finance Department if PGI is anticipated and assistance is needed for accounting of the income.

4.3f Equipment and Real Property Management

- All property and equipment acquired through grant funds shall follow the grantor and County policy and procedures for property or inventory control.
- Property and equipment purchased with grant source shall be used exclusively during the life of the grant for the project or program for which it was acquired.
- Grant purchased equipment must be properly maintained and safeguarded, and equipment records must be maintained per County inventory policy and procedure.
- After the grant award is closed and equipment is no longer needed for its originally authorized purpose, the grantee shall request disposition instructions from the grantor and follow County policy and procedures for property and inventory control.
- Grant purchased equipment cannot be transferred to another project or department after the grant award is closed without approval from the grantor.
- Title 2 CFR 200.313 provides guidance on use and disposition of equipment.
- Computers purchased with grant funds (less than \$5,000) are considered as supplies within 2 CFR 200.314. If multiple computers are purchased for the purpose of the grant objective, then the total sum of the purchase may cause the acquisition to be categorized as something other than supplies.

4.3g Earned Interest

For grants that are not on a reimbursable basis, grantee should not draw down more than 30 days worth of estimated expenditures. If there is interest (more than \$500) earned from the revenue, the interest must be remitted to the grantor.

4.4 PROCUREMENT AND SUSPENSION AND DEBARMENT

It is the responsibility of the recipient department to properly procure goods and services and follow all procurement rules. There are some differences between the federal, state, and County procurement rules. The recipient department must comply with the most stringent of the rules in procurement. It is also the responsibility of the department to ensure that any subcontractor or sub-awardee that will be funded through a grant award is not prohibited from receiving federal funds due to suspension or debarment. A person or entity debarred or suspended is excluded from federal financial and non-financial assistance and benefits under federal programs and activities. Debarment or suspension of a participant in a program by one agency has government-wide, reciprocal effect.

Prime contractors for federal projects must be current with their registration in SAM.gov and an active DUNS number. The project manager must ensure that the federal



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Excluded Parties List System (EPLS) within SAM.gov is verified and the proof of verification is printed for record keeping prior to entering into any contractual relationship or use of services.

4.5 GRANT REPORTING

The recipient department is responsible for coordinating the timely and accurate preparation and submission of all reports per the grant agreement. A copy of all the reports shall be attached to the project under eCivis program for review and use by the auditor.

Types of Reports

Performance: The recipient department is required to regularly submit and retain performance reports that reflect grant funded operational progress as required by the grant agreement.

Financial: The recipient department is required to regularly submit and retain financial reports that reflect a grant's fiscal health as required by the grant agreement. Grantors will typically request review of the grant ledger showing detailed account payable information along with expenditure invoices and receipts during program reviews.

Closeout: All grants have closeout reports that are due at the conclusion of the project. The closeout report will typically include financial accountability, performance accomplishments, etc. Recipient should refer to the grant agreement and consult with the grantor as to the reports required at the closing of a grant.

4.6 GENERAL STANDARDS FOR SUPPORTING DOCUMENTATION

Costs claimed by the County under grants must be allowable, allocable, and reasonable, and adequate documentation to support charges to the grant must be maintained for audit trails (reference 2 CFR 200). Expenditures under most cost reimbursement grants are governed by the cost principles established by federal, state and other grantors and must conform to respective policies, grant special provisions and County policies.

Typical grant transactions may include: personnel costs, purchase of equipment and supplies, costs for contracted services, grant income or revenue, etc. Pay extra attention to federal and state grants as to what is an allowable expenditure. If in doubt, contact the grantor or Finance Department. Grantees must submit documentation of eligible expenses and proof of payment for expenses incurred during the reporting period.

Documentation of eligible expenses may include copies of invoices, receipts, payroll or labor reports, or other proof that complies with federal and state audit standards. Proof of payment of expenditures may include a copy of a credit card receipt, receipt showing cash payment, cancelled checks, bank statements, or other proof that complies with



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federal and state audit standards. A supplemental accounting record may accompany the receipts and cancelled checks.

4.7 FILE MANAGEMENT

Proper file maintenance is critical in any grant office. For organization purposes, the pressboard 3-5 tab expandable folders are recommended for grant records. All grant awards must maintain a file structure that includes the important documents that chronicle the application, receipt of award, and all management related documents and correspondence through award closeout. The following is a recommended structure for organizing folders on grant awards (not all are applicable):

- Proposal or Application
- Award / Grant Contract
- Financial Records
- Performance Reports
- Correspondence
- Environmental Review Records
- Program Recipients (may be a separate file for each client)
- Employee Time and Effort
- Sub-recipient Files
- Procurement Records
- Project Closeout Documents

4.8 CONTRACT EXTENSION OR AMENDMENT

There are times when grantees find it necessary to amend the scope of work or extend the contract timeline. It is important to follow the procedures written in the grant agreement or in the guidelines provided by the grantor when making such a request. Grantee cannot spend funds on items that are not within the original scope of work until the amendment is pre-approved by the grantor. Keep in mind time extension is a reflection of the recipient's ability to perform the contract.

Any amendments that would increase or decrease the overall grant budget shall be submitted on an Agenda Item Review (AIR) Form with a Budget Amendment Form to the Board of Supervisors for approval. The County budget cannot be legally amended after the end of the fiscal year to incorporate previous amendments approved by the grantor. Therefore, grantees should use caution to ensure no grant funds are expended prior to approval and appropriation by the Board of Supervisors.

4.9 GRANT CLOSEOUT

Grant closeout is the process by which the County performs all necessary administrative and financial actions to satisfactorily complete all requirements set forth in the grant agreement, and generally addresses the physical completion of work, and the administrative requirements and financial requirements for closeout.



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Best Practices

- A. 90 days prior to the end of a project or grant agreement, determine if an extension would be needed from the grantor in order to complete the project.
- B. Notify all sub-recipients, contractors, subcontractors to submit final invoices.
- C. Reconcile revenues and expenses prior to the last request for payment to grantor. Coordinate with Finance Department for a final reconciliation prior to preparation of the closeout report to the grantor.
- D. Review the terms of the award and ensure that all deliverables are submitted by the designated due dates including final progress/technical reports.
- E. Within 30 days after the last request for payment has been received, prepare and submit closeout reports to the grantor in accordance with grant agreement and grantor requirement.
- F. Submit copies of the closeout report to the Finance Department and/or attach the document to eCivis with notification to the Finance Department.

4.10 GRANT TERMINATION

Unless approved by the Board of Supervisors, the County will not continue a grant funded program once the grant ends. Therefore, all grant supported staff positions will be abolished if the grant funding supporting them is eliminated. The recipient department must submit the appropriate paperwork to the Human Resources Department to abolish the terminating positions. Also, the recipient department must contact Finance Department if the department elects to terminate a grant funded program prior to the scheduled grant ending date. Procedures regarding the use, transfer and disposition of capital assets purchased with grant funds are addressed in the County's Capital Assets Accounting Policies. The recipient department may choose to continue operating capital expenses from an expired grant, using other funds available. Continuation of positions funded from expired grants requires approval by the Board of Supervisors.

Often, grants are expected to continue from year-to-year and recipient department budget this funding. However, a grantor may fail to notify the County until after the new fiscal year services have commenced that grant funding has been discontinued. This situation would result in recipient department having incurred expenditures with no funding source. To protect the County when grant funds are sub-granted (passed through) to other agencies, the contract with the agency should include a statement that "payment for services is contingent upon receipt of grant funds."

4.11 RECORD RETENTION

Recipient departments are obligated to protect records adequately against loss, theft, fire, or other damage in accordance with statutory provisions, and for obligatory destructions. In accordance with record keeping rules, grant documents must be kept for five (5) years after the audit year of the last expenditures. If any litigation, claim, negotiation, audit, or other action involving grant records has been started before the expiration of the five-year period, the records must be retained until completion of the



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action and resolution of all issues which arise from it, or until the end of the regular five-year period, whichever is later. If the grant is a federal grant passed through the state, record retention period is five years after the State's audit year of the last expenditures for that particular grant. Since Yuma County may only be one of the subrecipients in the state, the recipient department will need to retain the files until such time as the State provides a destruction date.



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CHAPTER 5: FEDERAL REQUIREMENTS FOR CONSTRUCTION PROJECTS

The recipient department must comply with federal requirements involving construction related projects. Departments should plan accordingly to ensure that adequate time, funding and staffing are available to carry out the federal requirements for construction projects. The requirements flow down to all subcontractors and subrecipients funded through a federal grant award.

Federal Labor Standards and Compliance

Any construction project that will be bid to a private contractor and cost in excess of \$2,000 must adhere to the federal labor standards provisions as follows:

- Davis Bacon Act – This law requires that laborers and mechanics receive not less than the wages and benefits determined by the Secretary of Labor to be “prevailing” in the area for the type of work performed. The wage determination for the proper classification of work must be included in the bid document. Wage determinations are issued by the Department of Labor (DOL) and can be found on their website. These are not necessarily the same as union wages.
- Contract Work Hours and Safety Standards Act (CWHSSA) – This law applies only if the construction contract is over \$100,000 and: defines overtime as all hours worked over forty (40) in any work week; requires overtime compensation at not less than 1½ times the regular hourly rate (not including fringe benefits) be paid for such hours to all laborers, mechanics, watchmen and guards; and makes employers responsible for back wages and for liquidated damages at the rate of \$40 per day if there are violations.
- Copeland Act (Anti-Kickback Act) – This law provides that all workers be paid unconditionally, and without deductions (except those that are permissible), based on DOL criteria. Deductions that meet such criteria include taxes, legally permissible voluntary deductions and those required by court action. It also requires the maintenance and submission of weekly payroll reports and statements of compliance. Furthermore, it is a criminal offense for any person to induce an employee to give up any portion of his/her compensation.
- Fair Labor Standards Act (FLSA) – This covers wages, overtime (even if the project is not subject to CWHSSA), record keeping and child labor standards for other employees hired by the contractor (i.e., those not covered by the federal labor standards provision.)

Uniform Relocation Assistance Act

The Uniform Relocation Assistance Act of 1970 is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Relocation Assistance Act’s protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federally funded projects. When relocation is needed for a project, there are very



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specific legal responsibilities to affected property owners and displaced persons that must be addressed.

Conflict of Interest

As a part of the grant application process, the grant preparer must positively state on any grant form, when asked, that there is an absence of a financial or other interest or affiliation held by them or a member of their immediate family in the funding agency or in companies from which goods and services will be obtained under the supported activity.



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CHAPTER 6: OTHER IMPORTANT FEDERAL GUIDELINES AND POLICIES

Environmental Review Record

For most federal grants, an environmental review record (ERR) must be completed and approved by the granting agency prior to the grantee proceeding with a project. The recipient department is the responsible entity to maintain a written record of the environmental review undertaken for the project and make it available for public review. There are four objectives to an ERR process:

- A. To comply with legal requirements.
- B. To assist in project planning.
- C. To determine if the proposed activity will have an impact on the environment.
- D. To determine whether the environment will have an impact on the proposed activity.

It is important to begin the environmental review process as soon as possible after determining the scope and nature of the project. No work may be started on a project and no construction contracts may be entered into until an ERR is completed and approved by the Grantor. Although the ERR process is the same under the requirement, interpretation of the rules may differ between federal agencies. Therefore, do not assume an ERR performed for one agency will automatically be accepted by a different agency.

There are four types of Environmental Review:

- A. Exempt
- B. Categorically Excluded
- C. Environmental Assessment
- D. Environmental Impact Statement

Depending on the scope of the project, the ERR may be a couple of pages for an "Exempt" project to a long involved report for an "Environmental Impact Statement" which requires a very time consuming and complicated process. The "Environmental Impact Statement" is typically for a construction project that disturbs the existing environment.

Federal Funding Accountability and Transparency Act (FFATA)

Public Law 109-282, the Federal Funding Accountability and Transparency Act of 2006 as amended (FFATA), requires disclosure of all entities and organizations receiving federal funds through a single publicly accessible website. USASpending.gov includes information on each federal financial assistance award and contract over \$25,000, including such information as:

1. The name of the entity receiving the award
2. The amount of the award



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3. Information on the award including transaction type, funding agency, etc.
4. The location of the entity receiving the award
5. A unique identifier of the entity receiving the award; and
6. Names and compensation of highly-compensated officers (as applicable)

Compliance with FFATA is primarily the responsibility of the awarding federal agency. However, grant and cooperative agreement recipients are responsible for reporting on executive compensation, when applicable, and sub-recipient awards over \$25,000. OMB guidance regarding FFATA related requirements is available at 2 CFR Part 170.

Civil Rights

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. In most cases, when a recipient receives Federal financial assistance for a particular program or activity, all operations of the recipient are covered by Title VI, not just the part of the program that uses the Federal assistance.

American with Disabilities Act (ADA) / Section 504 of the Rehabilitation Act

In the broadest sense, it requires that state and local governments be accessible to people with disability. This requirement is applicable to subcontractors and sub-recipients.

Lobbying Restrictions

Lobbying restrictions can be found in Section 200.450 of the federal administrative requirements. This section also identifies other agency regulations that discuss lobbying restrictions. Generally, federal grantees and sub-recipients are prohibited from using federal funds to influence federal employees or members of Congress and their staff. If a federal grantee or sub-recipient engages in lobbying activities, they must submit a form SF-LLL, Disclosure of Lobbying Activities, with their grant application.

Limited English Proficiency (LEP)

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibility, or understanding other information provided by federally funded programs and activities. Title VI of the Civil Rights Act of 1964 requires that recipients take reasonable steps to ensure meaningful access to the information, programs, and services they provide.

Drug-Free Workplace

2 CFR 182, Government-wide Requirements for Drug-Free Workplace (Financial Assistance) requires federal grantees and sub-grantees to agree to maintain a drug-free workplace.



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GLOSSARY OF GRANT TERMINOLOGY

TERM	DEFINITION
Accrual Accounting	A method of accounting where an entity's financial position and operating results are measured by the flow of economic resources. Transactions are recorded in the accounting period in which they occur regardless of when the related cash receipts and disbursements take place (in accordance with generally accepted accounting principles).
Administrative Requirements	Matters common to grants in general, such as financial management, kinds and frequency of reports, and retention of records.
Allocable Costs	A cost whether direct or indirect is chargeable to a specific grant in accordance with the relative benefits received by the funded program. Some key elements to allocability are: consistent treatment, benefit to the grant, necessary to the project, and fair share of common costs.
Allowable Costs	Applicable cost principles from the Uniform Guidance , agency program regulations, and the terms of the grant and subrecipient agreements must be followed in determining whether a specific item of cost is allowable.
Award	Financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money or property in lieu of money, by an entity to an eligible recipient . The term <i>does not include</i> : technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; or, contracts which are required to be entered into and administered under procurement laws and regulations.
Catalog of Federal Domestic Assistance (CFDA)	A database of all federal programs available to state and local government



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Closeout	The process by which an awarding entity determines that all applicable administrative actions and all required work of the award have been completed by the recipient and awarding entity. Closeout includes many actions including final reporting for the award, disposition of property and record retention requirements.
Commingling	The mixing or blending of funds within a financial accounting system so that expenditures cannot be identified relative to a particular award, subaward, project, or indirect activity . Commingling involving federal funds is prohibited by federal regulation.
Corrective Action	Action taken by the auditee or recipient of an award that: a) corrects identified deficiencies; b) produces recommended improvements; or c) demonstrates that audit or other findings are invalid or do not warrant auditee action.
Cost sharing	Cost sharing or "matching" means the value of third party in-kind contributions and the portion of the costs of a County, state or federally-assisted project or program not borne by the County, state or federal government, respectively. See also "Program Income."
Discretionary Grants	Grants given by a public agency, according to specific authorizing legislation, to exercise judgment or "discretion," in selecting the award recipient through a competitive grant process.
Draw Down	The action of requesting and receiving grant funds to cover obligated expenditures under the grant.
Donation	Any item of value given to the County by a donor who expects nothing of significant value in return, other than recognition and disposition of the gift in accordance with the donor's wishes. Donations are not accompanied by a contract or agreement, do not require deliverables, are generally irrevocable, and do not come with formal fiscal accountability requirements to the donor beyond (when applicable) periodic progress reports and/or summaries of expenditure.



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Dun and Bradstreet Universal Numbering System (DUNS)

A system that assigns unique numbers to entities for purposes of identification. See Unique Entity Identifier.

Equipment

Tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

Funding Opportunity

Announcement of open awards. Funding opportunities typically describe the award including the deadline date, funding amounts, award description, and other pertinent information.

Grantee

A **recipient** or **subrecipient** of an **award**.

Grant Life Cycle

The entire process of **grant** administration: applying for a grant, receiving a grant, managing a grant, and **closeout** of a grant.

Improper Payment

Any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under **statutory**, contractual, administrative or other legally applicable requirements; and any payment to an ineligible party, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by law), any payment that does not account for credit for applicable discounts, and any payment where insufficient or lack of documentation prevents a reviewer from discerning whether a payment was proper. Although an improper payment is generally made erroneously, the **recipient** or **subrecipient** is still held accountable.

Indirect Costs

Those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (also called Facilities and Administrative—F&A) costs. Indirect (F&A) cost pools must be distributed to



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benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.

In-kind Contributions

The value of non-cash contributions (i.e. property or services) that a) benefit a **grant**-funded project or program and b) are contributed by third parties, without charge, to the County or a County **subrecipient** under a County grant.

Inter-Governmental Agreement (IGA)

As it relates to **grants**, an **agreement** between the County and another Governmental unit issued to share in the funding and responsibilities of an externally-funded program. IGA's contain all of the elements of a **contract** and are legally-binding documents.

Internal Controls

The policies and procedures in place to provide reasonable assurance regarding the achievement of objectives in: effectiveness and efficiency of operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations.

Match

See **Cost Sharing**.

Memorandum of Understanding (MOU)

A written memorialization of a non-binding agreement between two or more parties. An MOU is not a formal **contract**, is not legally enforceable, and should contain a clause to this effect.

Non-Discretionary Grants

Grants that a federal agency is required by **statute** to award if the recipient, usually a state, submits an acceptable state plan or application and meets the eligibility and compliance requirements of the statutory and **regulatory** provisions of the grant program.

Program Income

Gross income earned by a **grantee** or **subgrantee** that is directly generated by a supported activity or earned as a result of the federal **award** during the **period of performance**. Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under federal awards, the sale of



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	<p>commodities or items fabricated under a federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with federal award funds. Program income is often included in a grant award as a “cost sharing” or “match” requirement.</p>
Real Property	<p>Land, including land improvements, structures and appurtenances thereto, but excludes movable machinery and equipment.</p>
Reasonable Costs	<p>A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.</p>
Recipient	<p>Entities awarded a grant and held accountable for the use of the funds provided. The recipient is the entire legal entity even if only a particular component of the entity is designated in the award document. Synonym: grantee.</p>
Regulations/Regulatory	<p>Rules or relating to rules issued by agencies acting under statutory authority.</p>
Risk Assessment	<p>A tool used by the County to evaluate the risk of potential subrecipients and to assign monitoring levels to subrecipients awarded grant funds. Risk assessments are “living documents” in that they should be updated throughout the award period as performance is evaluated or new events or incidents occur. County risk assessments will evaluate potential subrecipients for financial stability, the quality of management systems and the ability to meet management standards. Risk assessments will also take into account the history of subrecipient performance, findings from subrecipient audits, and the ability of the subrecipient to implement statutory, regulatory, or other requirements necessary to the performance of the award.</p>
SAM Check	<p>The documentation obtained when performing a suspension, disbarment and exclusion check on a potential grantee using the online System for Award Management, located at www.sam.gov. This is a</p>



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mandatory check when passing through federal funds to **subrecipients** and is often required by the state for the **subawarding** of state funds. A sample SAM Check, downloaded from www.sam.gov, is required for federal and state grants.

Subaward

An **award** provided by a **pass-through entity** to a **subrecipient** for the subrecipient to carry out part of an award received by the pass-through entity. It does not include payments to a **contractor** or **subcontractor**, or payments to an individual that is a beneficiary of a funded program. County subawards are issued as **subrecipient agreements**.

Subcontractor

An entity that receives funding issued under a **contract**. See **contractor**.

Subrecipient

The legal entity to which a **subaward** is made. A subrecipient is accountable to the **pass-through entity** (or entities) and the federal agency (if applicable) for the use of the funds provided. The term does not include an individual that is a beneficiary of such a program. The term may include foreign or international organizations (such as agencies of the United Nations) at the discretion of a federal awarding agency. Synonym: **subgrantee**.

Supplanting

The act of replacing state, local or other funds designated for a specific purpose with federal funds. Prohibited by federal law on most federal funding.

Supplies

All tangible personal property other than **equipment**. Computer equipment is considered a supply item if the cost is less than the capitalization threshold (\$5,000).

Suspension

(1) Temporary withdrawal of the authority to obligate **grant** funds pending corrective action by the **recipient** or **subrecipient** or a decision to terminate the grant.
(2) An action taken by a suspending official in accordance with agency **regulations** implementing E.O. 12549 to immediately exclude a person from participating in grant transactions for a period, pending completion of an investigation and such legal or debarment proceedings as may ensue.



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(3) An action by a federal awarding agency that temporarily withdraws federal sponsorship under an **award**, pending **corrective action** by the recipient or pending a decision to terminate the award by the federal awarding agency.

System for Award Management (SAM)

A federal online portal located at www.sam.gov that combines several prior federal procurement and financial assistance systems such as the Catalog of Federal Domestic Assistance (CFDA), Central Contractor Registration (CCR), Federal Agency Registration (Fed-reg), Online Representations and Certifications Application (ORCA) and Excluded Parties List System (EPLS) among others, for the purposes of registering and qualifying non-federal entities who seek federal awards. See **SAM Check**.

Termination

Permanent withdrawal of the authority to obligate previously-awarded **grant** funds before that authority would otherwise expire. It also means the voluntary relinquishment of that authority by the **recipient** or **subrecipient**. Termination does not include:

- (1) Withdrawal of funds awarded on the basis of the grantee's underestimate of the unobligated balance in a prior period;
- (2) Withdrawal of the unobligated balance as part of the expiration of the grant;
- (3) Refusal to extend a grant or award additional funds, to make a competing or noncompeting continuation, renewal, extension, or supplemental **award**; or
- (4) Voiding of a grant upon determination that the award was obtained fraudulently, or was otherwise illegal or invalid from inception.

Unique Entity Identifier

A number established and assigned to all non-federal entities that uniquely identifies the entities in all federal systems and to all federal agencies, currently equivalent to the DUNS number. A non-federal entity is required to have the unique entity identifier in order to apply for, receive, and report on a federal **award**, and to register in the **System for Award Management (SAM)**. See **Dun and Bradstreet Universal Numbering System (DUNS)**.



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Unliquidated Obligations For reports prepared on a cash basis, unliquidated obligations represent the amount of obligations incurred by the grantee that has not been paid. For reports prepared on an accrued expenditure basis, they represent the amount of obligations incurred by the grantee for which an outlay has not been recorded.

Unliquidated Balance That portion of funds authorized by the awarding agency that has not been obligated by the **grantee**; determined by deducting the cumulative obligations from the cumulative funds authorized.



YUMA COUNTY BOARD OF SUPERVISORS

RESOLUTION NO. 2017-05

ADOPTING AMENDMENTS TO THE
YUMA COUNTY GRANTS MANAGEMENT POLICY.

SUPERCEDES GRANTS MANAGEMENT POLICY APPROVED
JANUARY 6, 1997, AMENDED MARCH 19, 2012 AND
JUNE 16, 2014.

Revised by BOS on 02-21-17, Item No. D1

- WHEREAS:** The County's current Grants Management Policy was adopted by the Board of Supervisors on January 6, 1997 (item No. 15b (1-4), ID#: 9703), amended March 19, 2012 (item No. C5) and June 16, 2014 (Item No.C3, Resolution No. 2014-20) and;
- WHEREAS:** The existing policy contains language addressing both policy and procedures, and;
- WHEREAS:** A Grants Management Handbook has been developed to separately address procedures for applying and managing grants, and;
- WHEREAS:** The existing Grants Management Policy needs to be revised to address the County's policy pertaining to grant application, acceptance and implementation of grant awards.

NOW, THEREFORE, BE IT RESOLVED, the Grants Management Policy is hereby amended to read as follows:

INTRODUCTION

The County encourages its agencies and departments to seek supplemental grant funding to support functions and programs that are beneficial to the public. All County agencies and departments are subject to the policy for application, acceptance, and implementation of all grant awards. However, for grants that require no application (or received on an entitlement basis) and do not require budget amendment, the grant application and grant acceptance portions of the policy may not be applicable.

GENERAL PRINCIPLES

- The total additional costs associated with each new grant must be identified in all grant applications.
- When the grantor accepts indirect costs as an allowable cost, any expected indirect costs shall be included in the grant application, and any incurred and allowable indirect costs shall be computed and reported for reimbursement

charged at the rate calculated in the most current Yuma County Cost Allocation Plan or as stipulated by the grantor. All additional direct costs incurred to support a grant funded program shall be funded from the grant budget. Some expenditures may be charged to the operating budget of the agency or department benefitting from the grant (the grantee) as approved by the Board of Supervisors.

- Department and Agency Heads must obtain approval by the Board of Supervisors for the creation of any grant funded positions at the time of grant approval. Grant funded positions will be abolished upon expiration or termination of the grant. Grant funded employees must sign acknowledgment of the limited terms of their positions and employment is contingent on the availability of the grant fund. The acknowledgement must accompany the County's personnel action form to be submitted to the Human Resource Department.
- Department and Agency Heads must obtain approval from the Board of Supervisors for all applications requiring cash matching prior to grant submission. Any approved commitment of matching funds for a grant will end upon expiration or termination of the grant.
- The Board of Supervisors shall receive a summary of grant agreements during budget cycle.
- The grantee department is responsible for adhering to all policies and procedures attached to the grant by the grantor. Should there be any discrepancies between County and grantor policies and procedures; the grantee department is to follow the more stringent of the two.
- A Grants Oversight Committee is established to ensure necessary oversight for all grants in order to align grant programs to County strategic goals and mission; and to minimize the County's exposure to liabilities. County Departments or Agencies must notify the Committee prior to submitting applications for any new grants.
- A Grants Management Handbook shall guide departments/agencies in the application, acceptance, and management of grants and shall be periodically review and modify as needed by the Grants Oversight Committee. All County departments/agencies must follow the procedures outlined in the Grants Management Handbook unless otherwise authorized by the Board of Supervisors and/or County Administrator.
- The County Administrator has the authority to approve individual deviations from procedures outlined in the Grants Management Handbook.

APPLICATION APPROVAL

Agencies or departments may submit grant applications without the approval of the Board of Supervisors except in the following circumstances:

- The grantor requires it.
- There is hard cash matching fund (County General Fund) requirement.
- Additional staffing needed to operate the grant.
- There are future or ongoing contributions required after the grant period expires.
- The grant, if awarded, would require Board execution and the Board could not refuse to accept the grant.
- Controversy resulting from the application or receipt of the grant is anticipated.

INDIRECT/DIRECT COST RECOGNITION AND RECOVERY

Indirect costs are those that do not appear in an agency or project budget, but are necessary expenses to provide the service funded by the grant. Indirect costs incurred to support grant funded services will be reported for reimbursement when the grantor accepts indirect costs as an allowable cost in accordance with Yuma County's Indirect Cost Plan. Indirect cost expenditures and revenues will be analyzed at the end of each year and reclassified if necessary to prevent overstatement of revenues and expenditures among funds.

All direct costs incurred to support a grant funded program shall be funded from the grant budget or the operating budget of the grantee department or agency benefitting from the grant as approved. In the event the grantee is unwilling or unable to incur these additional direct costs in their operating or grant budget, it will be the grantee's responsibility to procure the additional funds needed and notify the Board of Supervisors at the time of grant approval.

GRANT ACCEPTANCE

In accordance with ARS §11-201, the Board of Supervisors is the only entity that has the authority to incur financial, legal, and other obligations on behalf of the County, its agencies, and elected officials. Although some agents or officers, acting under its authority, may have the authority to enter into contracts, all of their expenditures are subject to budgetary approval by the Board of Supervisors.

No multi-year agreement shall be executed without a "non-appropriation" clause permitting termination in the event of inadequate funding. Grants and intergovernmental agreements will identify how matching funds will be provided and their type. Matching funds may be in cash or in-kind.

In general, intergovernmental agreements require approval from the Board of Supervisors. For the purpose of grant agreements to or from other governmental units and other public, private, and non-profit organizations, the agency or department head and/or County Administrator may execute the grant agreements only if it is within budgeted appropriations and revenues, and are approved as to form by the County Attorney.

Adopted this 21st day of February, 2017.



MARCO A. "TONY" REYES
Chairman, Board of Supervisors

ATTEST:



SUSAN K. THORPE
County Administrator/Clerk of the Board

APPROVED AS TO FORM AND DETERMINED TO BE WITHIN THE SCOPE OF PERFORMANCE OF DUTY OF THE YUMA COUNTY BOARD OF SUPERVISORS:



JON R. SMITH, County Attorney

GRANT OVERSIGHT REVIEW FORM

Department:		Phone #:		Date:	
Initiated by:					
Proposal Writing Assistance Needed:					
Grantor:					
Grant Type:	CFDA# (if applicable):				
Grant Title:					
grants.gov assigned No:	New Grant:				
Application Due Date:					
Does the project meet County/Department goals and objectives:					
If yes, identify the goals and objectives:					
The # of grant trainings attended by staff the past 12 months:	Internal-	Internal-	Internal-	External-	External-
If this is a mandated service, cite the source:					
Brief Project Description:					
Estimated Request:	\$				
Matching Required:	\$				
Does the Department have the matching resources:					
Grant Uses:	Capital Improvement	Personnel	Programmatic	Other	

**FINANCIAL
SERVICES
DEPARTMENT**

**Scott G. Holt
Director**



198 S. Main Street
Yuma, Arizona. 85364

Voice (928) 373-1012
FAX (928) 373-1152

**Gil Villegas
Deputy Director**

Grant Administrative Approval

This form is to be used as a checklist of the documents that the Financial Services Department requires to (1) ensure adequate oversight of grant funding and, (2) have all grant documents available for the Yuma County annual audit.

FROM: _____
DEPARTMENT: _____

The following documents are for record keeping purposes.

<u>Document</u>	<u>Title/Contract No.</u>
() Grant Review Form (GRF)	_____
() Agreement/Contract	_____
() Intergovernmental Agreement	_____
() Other (please specify)	_____

Additional documents included (please list) _____

Please sign and date.

Grants Auditor Review: _____
County Attorney Review (if needed): _____
Finance Director Review: _____
County Administrator Review: _____

Signed documents returned to the department by: _____

YUMA COUNTY GRANT REVIEW FORM

Exhibit "D"

Form Initiator:	Department/Division:	Date prepared:
		Telephone:
Grantor:	Grant Title:	Grant Term: From: To:
Grant review needed by _____	Fund no/Dept no: _____ Revenue code: _____ (To be assigned by Financial Services if new)	
New Grant _____	Amendment No. _____ (Increase \$ _____ /Decrease \$ _____)	
Briefly describe purpose of grant::		
If amendment, provide reason::		
If this is a mandated service, cite source. If not mandated, cite indications of local customer support for this service.		

Funding Sources	Federal Funds	State Funds	County Funds	Other	Total
Current Fiscal Year					
Remaining Yrs _____					
Total Revenue					
Source of County funding (match) if needed (include department name, fund and department number): None			Federal Catalog of Federal Domestic Assistance (CFDA) No.:		
Method of collecting grant funds: Lump sum payment _____ Quarterly payments _____ Draw _____ Reimbursement _____					
Is revertment of unexpended funds required at end of grant period? Yes _____ No _____					

Cost of Services	Direct	Indirect	Total
Current Fiscal Year			
Remaining Years _____			
Total Cost			
Does Grantor accept indirect costs as an allowable expenditure? _____ If yes, dollar amount or percentage allowed: _____			
Number of new positions that will be funded from grant: _____ Number of existing positions funded from grant: _____			
Other County agencies impacted:			
Does the Agency Head accept all terms of the County's Grants Management Policy? Yes _____ No _____ If not, which exceptions should be made and why:			

ATTACH APPROPRIATE DOCUMENTATION (COPY OF GRANT, AMENDMENT, GRANTING LETTER, EXPLANATION/JUSTIFICATION)

REVIEW BY FINANCIAL SERVICES IS REQUIRED FOR ALL NEW GRANTS, RENEWALS & BUDGET AMENDMENTS	
Budget revision required _____ Matching funds identified & available _____ Indirect costs identified _____	
Comments:	
Signature/Date: _____	
<p style="text-align: center;">REVIEW OF NEW GRANTS BY COUNTY ATTORNEY</p> Approved as to form Yes _____ No _____ Comments: Signature/Date: _____	<p style="text-align: center;">REVIEW BY COUNTY ADMINISTRATOR</p> Recommend Board: Approve _____ Disapprove _____ Comments: Signature/Date: _____

Resolution Adopting FY 17 Budget Amendment (Funding) Number 17 - XX

<input type="checkbox"/> Approval Type <input checked="" type="radio"/> Legislative <input type="radio"/> Administrative		<input type="checkbox"/> Amendment Type <input type="radio"/> Transfer <input checked="" type="radio"/> Changes Size of Co. Budget	
<input type="checkbox"/> Authorized Positions Amendment Prepared <input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="checkbox"/> CIP Change <input type="radio"/> Yes <input checked="" type="radio"/> No	
ID No. of Authorized Positions Amendment: _____		n/a	
Date: _____	Requesting Dept: _____	Contact: _____	
Purpose of Amendment: _____			

Changes in Sources

Fund	Function		Department		Object Account		Amount
No.	Name	No.	Name	No.	Name	No.	Name
Total: \$							-

Impact: _____

Changes in Uses

Fund	Function		Department		Object Account		Amount
No.	Name	No.	Name	No.	Name	No.	Name
Total: \$							-

Impact: _____

Approvals (Initials|Date)

BOS (date only): _____ OMB: _____ Trans. Out Dept: _____

CAO: _____ FIN: _____ Trans In Dept: _____

Resolution Adopting FY 17 Budget Amendment - Authorized Positions Number 17 - XX

Exhibit "E"

Approval Type <input checked="" type="radio"/> Legislative <input type="radio"/> Administrative		Amendment Type <input checked="" type="radio"/> Reallocation <input type="radio"/> Changes Total Positions Auth. For Dept.	
Budget Amendment (Funding) Prepared <input type="radio"/> Yes <input checked="" type="radio"/> No		ID No. of Budget Amendment (Funding):	
Date:	Requesting Dept:	Contact:	
Purpose of Amendment:			

Position Title:		Status:	Position No.:		
Employee		Action	Effective Date		
Fund		Dept		Allocation	
No.	Name	No.	Name	Hrs per wk	% per fund
Current Allocation					
				Total:	0.0
				Total:	0.0
New Allocation					
				Total:	0.0
				Total:	0.0

Position Title:		Status:	Position No.:		
Employee		Action	Effective Date		
Fund		Dept		Allocation	
No.	Name	No.	Name	Hrs per wk	% per fund
Current Allocation					
				Total:	0.0
				Total:	0.0
New Allocation					
				Total:	0.0
				Total:	0.0

General Fund Fiscal Impact - current year and future years.			
Net Change in FTE			0.0
			0.0
			0.0

Approvals (Initial/Date)

BOS (date only): _____ N/A	Funding Dept: _____
CAO: _____	Supervising Dept: _____
OMB: _____	HR: _____
	Finance Director: _____