



TORRANCE COUNTY

Grant Program Management Policies and Procedures

I. Purpose and Authority

The Torrance County Grant Committee has developed these policies and procedures to insure that all current and future grant-funded programs are in full compliance with the terms and conditions of the contract between Torrance County and the Funding Agency. Furthermore, standardization of administrative procedures will enable the Torrance County Grant Coordinator, and the Offices of the County Manager, Treasurer, and Finance to provide oversight of the grant application process and routine monitoring and full oversight of all grant-funded programs. These policies and procedures have been reviewed by the Torrance County Attorney and approved by the Board of Torrance County Commissioners, herein after referred to as "Board." These *Grant Program Management Policies and Procedures* do hereby supersede any other grant program management policies and procedures that were previously and formally adopted by the Board.

II. Staff Positions, Departments, and Programs Affected

These policies and procedures apply to all employees, Departments, Elected Officials, Department Heads, and Grant Program Managers who are responsible for full implementation of policies and procedures as they apply to prior, pending, current, and future grant-funded programs.

III. Policy

1. Coordination of Grant Policy and Grant Operations

In order to track and manage grants through all stages of pre-award and post-award activity, Torrance County designates the Grant Coordinator within the County Manager's Office and the Grant Committee as responsible for implementing this policy. The Grant Committee consists of the Grant Coordinator as chair, County Manager, Finance Director, County Treasurer, Deputy Treasurer, and Purchasing Director.

The Grant Coordinator is the organizational point-of-contact for all grant activity. The Grant Coordinator shall:

- Recommend changes in grant policy and procedures as needed to the Grant Committee, County Manager, and Board.
- Serve as the County-wide point-of-contact for funding research and writing grant proposals including but not limited to:
 - Cooperating with Departments to identify issues and projects that require funding assistance and maintain a grant funding plan.
 - Identifying and informing Departments about appropriate funding opportunities.
 - Assisting Departments with the writing and review of grant proposals.
 - Coordinating submission of Federal proposals by maintaining centralized access to Grants.gov and eGrants to ensure the correct DUNS and SAMs registration is utilized consistently between Departments and that appropriate workspace roles are established.
 - Providing training and technical assistance to County staff involved in any aspect of proposal writing.
- Assist Departments and Grant Program Managers designated by Department Heads to interpret and apply policies and regulations of a grant and the Funding Agency.
- Track grant applications, awards, and major project management decisions associated with awarded grants including but not limited to:
 - Tracking revenues and expenditures associated with approved grants.
 - Documenting cash and in-kind match resources for each grant award and collaborating with Departments to ensure that all match requirements are met.
 - Reviewing all drawdowns of grant funding to ensure they conform to funding source requirements.
 - Maintaining a complete record of all grant documentation in electronic and paper formats organized by year of award.
- Maintain a standardized set of forms used for grant management and make available to all Departments and Grant Program Managers.
- Provide information for and participate in Funding Agency site visits, monitoring, and audits.

2. Department Responsibility for Grants

Department personnel will work with the Grant Coordinator to identify issues and projects that need funding, identify funding sources, and write grant proposals with the Grant Coordinator. Department personnel will also manage the day-to-day operations of a grant-funded program and grant award.

Department Heads are accountable for the grants that are within their departmental jurisdiction. In cases where more than one department is responsible for a grant, a lead department shall be designated. In this instance, all Department Heads shall be accountable.

Each Department Head shall:

- Designate a Grant Program Manager for every grant awarded to the Department.
- Notify the Grant Coordinator of intentions to apply for a grant or receipt of a proposal or grant approval/contract.
- Implement/manage awarded grant projects according to the terms and conditions of each grant proposal and grant award.
- Work with the Grant Program Manager to ensure grant awards are accurately tracked.
- Consult with the Grant Coordinator as needed to ensure compliance with County and Funding Agency policies and procedures.
- Ensure reimbursement requests are submitted on or prior to designated due dates to minimize the advance use of County funds. All drawdowns of grant funding must conform to funding source requirements and County policies pertaining to the receipt of grant funds.
- Ensure that the Department observes all project reporting requirements and timely submits all financial and program reports as specified by each grant award to the Funding Agency and Grant Coordinator.
- Provide information for and participate in Funding Agency site visits, monitoring, and audits.

3. Finance Department Functions and Responsibilities

The Finance Department shall:

- Review all drawdowns of grant funding to ensure they conform to internal Finance policies.
- Establish appropriate account code assignments for charging costs to grants.
- Record expenditures associated with approved grants.
- Ensure the accounting system of the County tracks revenue and expenditures associated with every grant award.

4. County Treasurer Functions and Responsibilities

The County Treasurer shall:

- Have exclusive authority to deposit all grant funding received by the County into appropriate accounts.
- Record revenues associated with approved grants.

5. Internal Compliance Audit

All grants awarded to the County are subject to compliance with the *Grant Program Management Policies and Procedures*. The County Manger or Board may approve a compliance audit, at their discretion, or at the request of the Grant Coordinator, of any grant awarded to the County at any time.

If a grant program should be determined to be non-compliant with the *Grant Management Policies and Procedures* or the Funding Agency, the Grant Coordinator will notify the Department Head and Grant Program Manager, in writing, of specific deficiencies and required corrective action steps.

The corrective action steps must be completed within thirty (30) days of notification by the Grant Coordinator. If the corrective action steps cannot be completed within the thirty (30) day period, then the Department Head and/or Grant Program Manager shall send a letter explaining the reason and requesting a time extension to the Grant Coordinator. Additional time may be granted on a case-by-case basis, and the Grant Coordinator and County Manager shall make that determination within ten (10) days of receipt of a request for extension.

Continued non-compliance of a grant program will result in suspension of all purchase orders and expenditure privileges, disciplinary action (reprimand, suspension, demotion, and/or termination), and/or loss of grant administration rights/privileges.

The Department Head and/or Grant Program Manager may formally appeal non-compliant status to the Board through the County Manger.

IV. Procedures

1. Grant Application and/or Renewal Process

The Grant Coordinator and County personnel will work together to identify issues and projects that need funding, identify funding sources, and write grant proposals. When a problem or project requiring funding is determined, the person identifying the issue/project and/or Grant Coordinator will complete a *Problem Statement Form* to initiate a funding search. The Grant Coordinator will notify the applicable Department Head and/or Grant Program Manager that a funding search has started. The Grant Coordinator shall maintain a copy of the form and use it to guide a search for funding opportunities. Once a funding opportunity is located, the Grant Coordinator will notify the Office of the County Manager and the applicable Department immediately. Departments may continue their own search but shall notify the Grant Coordinator immediately if a potential funding opportunity is discovered.

Once a grant opportunity is located, the Grant Coordinator will work with the Department Head or Grant Program Manager or other designated point-of-contact to determine feasibility and eligibility, identify contributors to the grant application, and define a plan of action to prepare and submit the application timely. The Department and Grant Coordinator will present a grant synopsis to the Board for required approvals. The Grant Coordinator will maintain an electronic and hard copy of all documents associated with an application including:

- Problem Statement Form
- Notice of Funding Opportunity (NOFO) or Request for Proposal (RFP)
- Notes and Information gathered to prepare the proposal
- Application Drafts and Approvals
- Correspondence
- Final Application
- Miscellaneous documents including presentations to the Board and resulting approvals.

2. Grant Award Process

Departments receiving a grant award, renewal, extension, or amendment must submit a full copy of the grant agreement or contract to the Grant Coordinator for review by the Grant Committee. The Department Head and/or Grant Program Manager must attend the Grant Committee meeting to present a summary of the grant award, renewal, extension, or amendment and answer questions regarding the grant award.

Upon the Grant Committee's review of the Department's grant award, the Department must file an agenda request with the Torrance County Manager's Office to be added to the next Board meeting. The original grant agreement and the required number of copies must be attached to the agenda request and submitted according to required deadlines and rules set by the Manager's Office. A copy of the grant agreement along with a request to approve as to form and sufficiency must also be submitted to the County Attorney. If the grant award document does not have a specific place for legal review, then the County Attorney shall provide approval using the *Form and Sufficiency Approval* form.

Departments receiving a grant award, renewal, extension, or amendment must appear at the County Board meeting to present an oral summary of the grant award. The Board will consider the grant agreement, grant summary prepared by the Grant Committee, and *Form and Sufficiency Approval* form as part of the decision making process. The Board will make the final determination to accept or reject the grant award.

3. Grant Contract Management

Department employees, Elected Officials, Department Heads, and/or Grant Program Managers who are responsible for grant-funded programs are required to attend a Training Workshop on Torrance County's Grant Management procedures. The Grant Coordinator will conduct trainings on an as-needed basis.

The grant contract file format will be standardized. This content will be provided and maintenance procedures reviewed during the training workshop. Each grant file will fully document the grant and will generally include:

- Section 1: Pre-Award Documentation
 - Notice of Funding Opportunity (NOFO) or Request for Proposal (RFP)
 - Program Guidance
 - Application
- Section 2: Contractual Documents
 - Award Letter
 - Complete copy of the contract with scope of work and reporting requirements
 - Grant Committee, County Attorney, and Board approvals.
 - Budget
 - Amendments
- Section 3: Correspondence
 - Correspondence from Torrance County
 - Correspondence from Funding Agency
- Section 4: Financial Reports
 - Procurement Records
 - Invoices
 - Accounts Payable Forms
 - Reimbursement Requests
 - Receipts
 - Deposit Slips
 - Checks and/or Journal Entries reflecting ACH (automatic clearing house) payments
 - Liquidation Records
- Section 5: Program Reports
 - Program Reports specified in the grant agreement
- Section 6: Miscellaneous
 - All other documentation necessary to maintain complete record of the grant

Department employees, Elected Officials, Department Heads and/or Grant Program Managers who are responsible for grant funded programs are required to maintain a grant file at their department site and give all documents including correspondence to the Grant Coordinator on a monthly basis. The Grant Coordinator will be responsible for the Official Grant File containing all original documents which will be maintained in a centralized location for audit purposes.

4. Budget Process

A budget request must be submitted to the Finance Department on the *Budget Request* Form before a grant can be incorporated into the County's budget. Grant approval by the Board does not automatically or necessarily constitute approval of the final budget.

All budget increases are subject to approval by the Department of Finance and Administration (DFA). Grant funds may not be expended or encumbered prior to DFA approval without the approval of the Finance Director.

5. Fiscal Management

Department employees, Elected Officials, Department Heads and/or Grant Program Managers who are responsible for grant-funded programs are required to file reimbursement requests on a monthly basis, unless otherwise specified by the Funding Agency in the grant agreement. The Department must keep an up-to-date calendar of all report due dates to ensure all reports are submitted timely. A copy of this calendar must be provided to the Grant Coordinator. All reimbursement requests must be reviewed by the Grant Coordinator prior to submission to the Funding Agency to ensure accuracy and grant compliance.

When a request for reimbursement is submitted, a corresponding deposit slip, in the approved format, must be filed with the Torrance County Treasurer and a copy sent to the Grant Coordinator. The deposit slip must reflect the correct grant name, deposit line item, the time frame of the reimbursement, the Department, and the name of the depositor. A deposit slip will be provided to each Department. The deposit slip cannot be modified by the Department in any way.

Once reimbursement is received, a copy of the check and/or journal entry reflecting ACH (automatic clearing house) payment must be sent to the Grant Coordinator to be placed in the grant folder.

6. Federal Grants

Drawdowns

- A. Federal grant drawdowns must be based on actual expenditures incurred during the reimbursement cycle being reported.
- B. If a Department wants to drawdown funds that have not been expended, they must have written permission from the County Manager and the Finance Department. **Drawdowns of Federal grant funds should be the minimum amounts needed for disbursements to be made immediately or within 10 days of the drawdown.**
- C. All amounts for drawdowns requested must be supported by documentation (invoices, expense reports, etc.).
- D. A copy of all drawdowns with supporting documentation, and a deposit slip must be submitted to the Grant Coordinator, Finance Department, and the County Treasurer's Office immediately after submission to the Funding Agency.

Financial Reports

- A. All Federal Financial Reports must be accurately prepared by the responsible Department and submitted to the Grant Coordinator prior to submission to the Federal Funding Agency. The

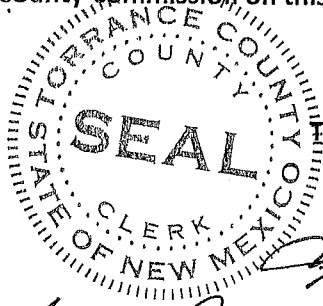
Grant Coordinator will review the report for mathematical accuracy and compliance with Federal grant procedures.

- B. The Department must keep an up to date calendar of all report due dates to ensure all reports are submitted timely. A copy of this calendar must be provided to the Grant Coordinator to ensure deadlines established by Federal grant administration procedures are met.

Other Reports and Requirements of Federal Grants:

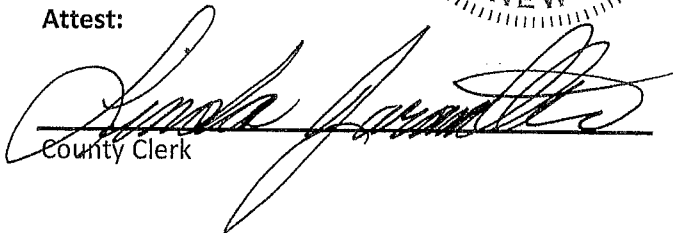
- A. It is the responsibility of the Department to review the most current version of the Federal grant administration procedures to ensure compliance. A copy must be provided to the Grant Coordinator for additional monitoring and compliance.
- B. Non-compliance with any Federal grant procedures and/or audit findings may result in future grant application and administration restrictions by the Board.


Approved by the Torrance County Commission on this 26th day of June 2019.





TORRANCE COUNTY COMMISSION

Attest:


County Clerk


Kevin McCall, Commissioner District 1


Ryan Schwebach, Commissioner District 2


Javier Sanchez, Commissioner District 3

Legal Review:


John Butrick, County Attorney