

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.

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 or designee, 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 of County Commissioners, herein after referred to as "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.

- 1 ○ Providing training and technical assistance to County staff involved in any aspect of
- 2 proposal writing.
- 3 ● Assist Departments and Grant Program Managers designated by Department Heads to interpret
- 4 and apply policies and regulations of a grant and the Funding Agency.
- 5 ● Track grant applications, awards, and major project management decisions associated with
- 6 awarded grants including but not limited to:
- 7 ○ Tracking revenues and expenditures associated with approved grants.
- 8 ○ Documenting cash and in-kind match resources for each grant award and collaborating
- 9 with Departments to ensure that all match requirements are met.
- 10 ○ Reviewing all drawdowns of grant funding to ensure they conform to funding source
- 11 requirements.
- 12 ○ Maintaining a complete record of all grant documentation in electronic and paper formats
- 13 organized by year of award for minimum of seven (7) years.
- 14 ● Maintain a standardized set of forms used for grant management and make available to all
- 15 Departments and Grant Program Managers.
- 16 ● Maintain SAMs registration.
- 17 ● Provide information for and participate in Funding Agency site visits, monitoring, and audits.
- 18

19 **2. Department Responsibility for Grants**

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

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

26 Each Department Head shall:

- 27 ● Designate a Grant Program Manager for every grant awarded to the Department.
- 28 ● Notify the Grant Coordinator of intentions to apply for a grant or receipt of a proposal or grant
- 29 approval/contract.
- 30 ● Implement/manage awarded grant projects according to the terms and conditions of each grant
- 31 proposal and grant award.
- 32 ● Work with the Grant Program Manager to ensure grant awards are accurately tracked.
- 33 ● Consult with the Grant Coordinator as needed to ensure compliance with County and Funding
- 34 Agency policies and procedures.

- 1 • Ensure reimbursement requests are submitted on or prior to designated due dates to minimize the
2 advance use of County funds. All drawdowns of grant funding must conform to funding source
3 requirements and County policies pertaining to the receipt of grant funds.
- 4 • Ensure that the Department observes all project reporting requirements and timely submits all
5 financial and program reports as specified by each grant award to the Funding Agency and Grant
6 Coordinator.
- 7 • Provide information for and participate in Funding Agency site visits, monitoring, and audits.

8

9 **3. Finance Department Functions and Responsibilities**

10 The Finance Department shall:

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

16

17 **4. County Treasurer Functions and Responsibilities**

18 The County Treasurer shall:

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

22

23 **5. Internal Compliance Audit**

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

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

30 The corrective action steps must be completed within thirty (30) days of notification by the Grant
31 Coordinator. If the corrective action steps cannot be completed within the thirty (30) day period, then the
32 Department Head and/or Grant Program Manager shall send a letter explaining the reason and requesting
33 a time extension to the Grant Coordinator. Additional time may be granted on a case-by-case basis, and
34 the Grant Coordinator and County Manager shall make that determination within ten (10) days of receipt
35 of a request for extension. Continued non-compliance of a grant program will result in suspension of all

1 purchase orders and expenditure privileges, disciplinary action (reprimand, suspension, demotion, and/or
2 termination), and/or loss of grant administration rights/privileges.

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

6 **IV. Procedures**

7 **1. Grant Application and/or Renewal Process**

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

17 Once a grant opportunity is located, the Grant Coordinator will work with the Department Head or Grant
18 Program Manager or other designated point-of-contact to determine feasibility and eligibility, identify
19 contributors to the grant application, and define a plan of action to prepare and submit the application
20 timely.

21 The Department and/or Grant Coordinator shall present a grant synopsis to the Board using the *Grant*
22 *Application Review and Approval* form. Except as provided in this paragraph and Subsection 2
23 immediately below, the County Manager may not approve any grant application until the Board
24 authorizes the County Manager to proceed with the grant application and act with the authority of the
25 Board during the application process. Approval to proceed with the application shall be recorded on the
26 *Grant Application Review and Approval* form. The County Manager is authorized to approve grant
27 applications in cases where the associated County match is less than or equal to \$5,000 and the
28 application deadline is prior to the next regularly scheduled Board meeting. In such cases, the grant
29 application shall be presented to the Board for concurrence and County match funding approval at the
30 next regularly scheduled meeting.

31 The Grant Coordinator will maintain an electronic and hard copy of all documents associated with an
32 application including:

- 33 • Problem Statement Form
- 34 • Notice of Funding Opportunity (NOFO) or Request for Proposal (RFP)
- 35 • Notes and Information gathered to prepare the proposal
- 36 • Application Drafts and Approvals
- 37 • Correspondence
- 38 • Final Application

- 1 • Miscellaneous documents including presentations to the Board.
- 2 • *Grant Application Review and Approval* form.

3

4 **2. Grant Award Process**

5 Departments receiving a grant award/contract/agreement, renewal, extension, or amendment; herein after
6 referred to as “agreement,” shall submit a full copy of the agreement to the Grant Coordinator for review
7 by the Grant Committee. The Department Head and/or Department Grant Program Manager shall attend
8 the Grant Committee meeting to present a summary of the agreement and answer questions regarding the
9 grant. Approval by the Grant Committee shall be recorded on the *Grant Review Summary* form.

10 Upon the Grant Committee’s review and approval of the agreement, the Department must file an agenda
11 request with the Torrance County Manager’s Office to be added to the next Board meeting. Three original
12 grant agreements and the required number of copies must be attached to the agenda request and submitted
13 according to required deadlines and rules set by the Manager’s Office. A copy of the agreement, along
14 with a request to approve as to form and sufficiency, must also be submitted to the County Attorney
15 immediately following approval by the Grant Committee. If the grant agreement does not have a specific
16 place for legal review, then the County Attorney shall provide any warranted approval using the *Form*
17 *and Sufficiency Approval* form.

18 Following approval of the agreement by the Grant Committee, then Departments and/or the Grant
19 Coordinator must appear at the Board meeting to present an oral summary of the grant agreement. The
20 Board will consider the agreement, *Grant Review Summary* form, and *Form and Sufficiency Approval*
21 form, if applicable, and any statements made by the Departments and/or Grant Coordinator as part of the
22 decision making process. The Board will make the final determination to accept or reject the grant award.
23 Acceptance of the agreement shall be formalized by Board member signatures on the agreement.

24 If the grant agreement deadline does not permit for Board review during a regularly scheduled Board
25 meeting, and if the agreement specifies a match from the County of \$5,000 or less of cash or in-kind, the
26 County Manager is authorized to approve and sign the grant agreement after individually notifying all
27 Board members and affording them the opportunity to request a special meeting for the purpose of grant
28 agreement approval. In such cases, the executed grant agreement shall be presented to the Board at the
29 next regularly scheduled meeting for concurrence and funding approval. At no time shall the County
30 Manager approve a grant agreement if it is possible for the Board to review the agreement at a regularly
31 scheduled meeting.

32

33 **3. Grant Contract Management**

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

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

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

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

1 **4. Budget Process**

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

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

8

9 **5. Fiscal Management**

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

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

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

23

24 **6. Federal Grants**

25 **Drawdowns**

26 A. Federal grant drawdowns must be based on actual expenditures incurred during the
27 reimbursement cycle being reported.

28 B. If a Department wants to drawdown funds that have not been expended, they must have written
29 permission from the County Manager and the Finance Department. **Drawdowns of Federal**
30 **grant funds should be the minimum amounts needed for disbursements to be made**
31 **immediately or within 10 days of the drawdown.**

32 C. All amounts for drawdowns requested must be supported by documentation (invoices, expense
33 reports, etc.).

34 D. A copy of all drawdowns with supporting documentation, and a deposit slip must be submitted to
35 the Grant Coordinator, Finance Department, and the County Treasurer's Office immediately after
36 submission to the Funding Agency.

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1 **Financial Reports**

- 2 A. All Federal Financial Reports must be accurately prepared by the responsible Department and
3 submitted to the Grant Coordinator prior to submission to the Federal Funding Agency. The
4 Grant Coordinator will review the report for mathematical accuracy and compliance with Federal
5 grant procedures.
- 6 B. The Department must keep an up to date calendar of all report due dates to ensure all reports are
7 submitted timely. A copy of this calendar must be provided to the Grant Coordinator to ensure
8 deadlines established by Federal grant administration procedures are met.

9 **Other Reports and Requirements of Federal Grants:**

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

1 **TORRANCE COUNTY**
2 **BOARD OF COUNTY COMMISSIONERS**

3 **RESOLUTION NO. R 2019- 47**

4
5 **A RESOLUTION ESTABLISHING THE TORRANCE COUNTY GRANT PROGRAM**
6 **MANAGEMENT POLICIES AND PROCEDURES**

7
8 **WHEREAS**, grants are a useful and necessary part of providing services to the residents
9 of Torrance County; and

10 **WHEREAS**, each grant has its own set of requirements and qualifications; and

11 **WHEREAS**, Torrance County created a Grant Coordinator position for the purpose of
12 identifying potential grant funding; and

13 **WHEREAS**, the Grant Coordinator is charged with grant compliance; and

14 **WHEREAS**, it is necessary to have a clear and consistent policy to facilitate both the
15 timely completion of grant applications and reporting requirements.

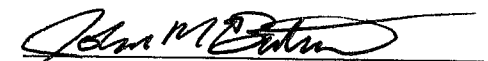
16 **NOW, THEREFORE BE IT RESOLVED** the Torrance County Board of
17 Commissioners does hereby adopt the attached document entitled "Grant Program Management
18 Policies and Procedures"; and


19 **BE IT FURTHER RESOLVED** that the attached policy replaces any previous policies
20 or resolutions.

21 **DONE THIS 14th DAY OF AUGUST, 2019.**

22
23 **APPROVED AS TO FORM:**

BOARD OF COUNTY COMMISSIONERS


24
25 
26 County Attorney Date


Ryan Schwebach, Chair


Javier Sanchez, Vice Chair


Kevin McCall, Member

33 **ATTEST**

34 
35 Linda Jaramillo, County Clerk

36
37 Date: 8/14/19

