

Policy Title: Fiscal Review and Administration of Grants

Policy Number: Part 4, Fiscal Administration; Chapter 7, Grants and Agreements; Section 1

Type of Policy: Administrative

Adopting Resolution: ~~CC18-099~~

References: Use of Information Technology Resources Policy, Information Security Policy, Grants Administration Procedure; 2 Code of Federal Regulations 200; Resolutions CC07-470, CC16-179, CC18-099

Effective Date: ~~March 20, 2018~~

Adoption Date: ~~March 27, 2018~~

Administrative Revision Date: ~~October 29, 2019~~

Policy Custodian: Finance Division

Purpose: To ensure that the fiscal impacts of grants are reviewed and understood prior to acceptance and to ensure proper administration.

A. Definitions

1. Fiscal Impact: A Fiscal Impact is any requirement, either a specific condition of the grant or a secondary necessity to administer the grant, that requires the county to contribute financially or in-kind to the grant funded project. A grant that provides for a grant funded position has a Fiscal Impact.
2. Protected Personally Identifiable Information (Protected PII): Protected PII means an individual's first name or first initial and last name in combination with any one or more types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics information, date and place of birth, mother's maiden name, individual's maiden name, criminal, medical and financial records, and educational transcripts. This does not include PII that is required by law to be disclosed.

B. Fiscal Review

1. Evaluation
 - a. Prior to applying for a grant where there are Fiscal Impact(s), the Department/Division Director or Appointed or Elected Official shall assure that the county can meet the required obligations.
 - b. The Department/Division Director or Appointed or Elected Official shall also develop a strategy to terminate grant funded positions, and/or address on-going costs of staff positions, reporting requirements, and funding obligations.

C. BCC Approval and Notification

1. Pre-Application Briefing

Prior to applying for any grant that has a Fiscal Impact(s) on the county, the Board of County Commissioners (BCC) must be briefed. The BCC approval must be received prior to submitting the grant application. The BCC, in its sole discretion, may place restrictions on the grant application or acceptance process. At the Pre-Application Briefing the BCC may permit staff to proceed with all aspects of the grant including acceptance of the grant. Staff shall follow the direction provided by the BCC at the Pre-Application Briefing.

2. Application Approval

- a. If the grant application or grant terms require execution or approval by the BCC, the resolution shall be prepared for BCC approval on their business consent agenda at a future BCC business meeting. If given direction at the Pre-Application Briefing, the resolution may include submission of the application and acceptance of the grant terms and agreement if the grant is awarded, as well as direction to proceed with applicable budget supplementals.
- b. After the Pre-Application Briefing, the application, contract and associated document(s) shall be executed in accordance with the Contract and Delegation Authority Policy and/or the Purchasing Policy except where the grant conditions require execution at a level other than that set forth in the Policies. If the grant application or grant terms do not require execution or approval by the BCC, a BCC resolution is not required.

3. Pre-Acceptance Notification

- a. Prior to the acceptance of a grant, the grant manager shall notify the BCC, via email or informal meeting, of the intent to accept an award.
- b. If there are any items of concern, or terms and conditions of the grant that were not brought to the attention of the BCC in the Pre-Application Briefing, items that have a different Fiscal Impact than previously presented to the BCC, or the BCC requested additional information or briefings, a second briefing shall be conducted.

D. Compliance with Grant Requirements

1. All Grants:

- a. The grant's manager must safeguard protected personally identifiable information and other sensitive information. (See Data Protection in Use of Information Technology Resources Policy)
- b. The Division Director or his/her appointed designee shall maintain all records and provide required documentation to the Finance Division in accordance with the Grants Administration Procedure.

- c. Grant managers shall submit all required reports in accordance with the grant requirements.
- d. Grant managers shall notify the Inventory Control Specialist of any fixed assets purchased with grant funds per the Property and Equipment Inventory Policy and Procedure. This will include all inventory deemed at risk for loss or theft.

2. Federal and State Grants Subject to 2 CFR 200:

- a. Grant managers of Federal grants must comply with all applicable provisions of 2 CFR 200.
- b. If relocation costs of an employee are included in a grant, the grant manager must comply with 2 CFR 200.464.
- c. Grant managers shall comply with 2 CFR 200 Subpart E Cost Principles and the Intergovernmental Revenue, Grants and Cooperative Agreements Procedure.
- d. For Federal and State grants, financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to the grant award must be retained for a period of three years from closeout, or the length of time specified in the grant agreement, or until all litigation, claims or audit findings involving the records have been resolved and final action taken.
- e. Advance payments must be kept in an interest bearing account per 2 CFR 200. If advance payments are received, the grant manager must develop written procedures to monitor and remit the interest earned. These procedures must be approved by the appropriate Department Director or Elected/Appointed Official and the Finance Division.
- f. In accordance with 2 CFR 200.305, the time elapsed between the transfer of federal funds from the awarding agency and disbursement, or expenditure of those funds shall be minimized. All departments and authorized personnel shall ensure that federal funds are requested and disbursed in a timely manner to avoid excessive cash on hand and to reduce risk of misuse or loss. Funds will be drawn down only as needed for immediate expenditure to comply with the federal requirement to minimize the time between receipt and use of funds.

3. Federal and State Grants Not Governed by 2 CFR 200

For all other Federal or State grants not subject to 2 CFR 200, the County shall follow the requirements specified by the awarding agency or funder.