



Grants Manual

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PREFACE

This document is the Grants Administration Handbook prepared by the Santa Rosa County Grants and Special Projects Department. The handbook addresses the Board of County Commissioners (BOCC) policy, federal and state laws and regulations, and other relevant information pertaining to grants administration in Santa Rosa County.

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 procedures to direct County staff in the pursuit, application, and management of grant proposals and awards.

UPDATES AND REVISIONS

This document is a living document, and contains federal, state, and County policy that by its nature may be revised over time as regulations change, new tools emerge, new processes are designed, and risks change. The Grants and Special Projects Department will review this document no less than annually, and update as necessary or as circumstances dictate.

This document borrows format and some content from Hillsborough County Grants Administration Handbook, 2nd Edition, Version 1.0.

CHAPTER 1: PURPOSE, SCOPE, AND AUTHORITY

PURPOSE

The purpose of this handbook is to document grants related protocol for the pursuit of grant funding and the management of grant awards as well as to serve as an informational guide for all Santa Rosa County Departments that have a need or interest in grant funding. The handbook describes the grants administration policy and procedures of Santa Rosa County associated with:

- Grant Identification, Application, and Tracking
- Grant Award Notification, Review, and Acceptance
- Grant Oversight and Monitoring
- Grant Accounting and Reporting
- Grant Subrecipient Monitoring
- Grant Close-out

SCOPE

Support and Control

It is the responsibility of the Grants Department under the direction of the County Administrator to implement the BOCC grant administration policy and to provide procedures that detail the grant proposal seeking process and the proper execution, management, and close out of the County's grant awards; and report on the submission and status of grants in a manner that assures transparency and accountability to the Board, grantors, and the public.

Definition of a Grant

A grant is financial assistance from an external entity to carry out a public purpose. Funds can either be disbursed directly by the granting agency to the County, or may be passed through another entity - such as the state or other governmental entity.

GOVERNING LAWS AND REGULATIONS

Federal

- Federal Grant and Cooperative Agreement Act of 1977, as incorporated in Title 31 Section 6304 of the US Code
- Office of Management and Budget (OMB), 2 CFR Parts 200, et al. – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

State

- Florida Statutes, Chapter 125 County Government
- Florida Statutes, Chapter 287 Consultants' Competitive Negotiation Act (CCNA)
- Florida Administrative Code
- Rules of the Auditor General, Chapter 10.550, Local Governmental Entity Audits
- Florida Single Audit Act, Florida Statutes 215.97

County

- Procurement policy -Ordinance No. 2002-13
- Equal Employment Opportunity Program and Policy Against Discrimination, Harassment and Retaliation
- Title VI and Nondiscrimination Plan

CHAPTER 2: SANTA ROSA COUNTY GRANTS ADMINISTRATION POLICY

PURPOSE

Grants are an exceptional way to fund County projects; however, they come with the expectation that all work including the management of the grant award will follow the highest standards of the regulatory and budgetary requirements of the grantor and the County. Failure to comply with such requirements can lead to a loss of goodwill and the return of funds. Inadequate review of grant proposals or grant awards may lead to the County spending funds to support a grant project inconsistent with overall strategic direction, or may commit the County to spending beyond the period of the grant. Adherence to a grants policy promotes efficiency, transparency, and accountability, while creating a strategic approach to funding opportunities.

POLICY

It is the policy of the Grants and Special Projects Department (Grants Department) to seek grant funding for activities and assets that are determined to further core County functions, or that provide for activities and assets that are in the best interest of the County and its residents. When allowable and practical, we will ensure that grant funds are administratively allocated to offset grant salaries and other overhead and administrative expenses. ***No grant application or request for funding assistance shall be submitted without approval of the Board of County Commissioners (BOCC). Additionally, no external entity may apply for grant funding on behalf of the County without prior BOCC approval.***

ROLES AND RESPONSIBILITIES

Board of County Commissioners

All grant applications require authorization by the BOCC. The Chair of the BOCC, or Vice Chair in his absence, will sign as the Authorized Organizational Representative on behalf of the BOCC.

Procurement Department

The Procurement Department coordinates the bid process for contractors and vendors for grant funded projects and procurement of equipment and supplies in accordance with County procurement policy.

County Attorney

The County Attorney's office provides legal advice, counsel, and legal representation to the BOCC, the County Administrator and County departments. The County Attorney, or his/her designee, reviews all grant agreement documents prior to execution and prepares and negotiates contracts, settlements, and other documents pertinent to grant awards.

All SRC Departments

When an SRC department participates in a grant funded project or program, or is impacted by grant funding, coordination with the Grants Department is required to ensure accurate reporting on the Schedule of Expenditures of Federal Awards (SEFA) at year end. It is the Grants Department's top priority to ensure that the county complies with all federal and state requirements related to seeking and expending grant funds.

SRC departments should notify the Grants and Special Projects Department of significant grant related activities such as: grant planning, grant submission, grant approval, grantor site visits, grantor program reviews, key staff changes, misconduct involving grant program financials or programmatic activities, etc. These notifications allow the grants office to track County grant initiatives more effectively during the lifecycle of a grant. Additionally, departmental grant managers should bear in mind the following:

- A copy of all executed grant agreements, contracts, modifications, amendments or any other formal grant paperwork should be provided to the Grants Department upon issuance by the grantor.
- If assistance is needed with managing grants or if there are any questions related to compliance, the Grants Department should be contacted for assistance. The Grants Department can provide resources and advice to assist with managing departmental grants.
- Communication with the grantor contact is key to the success of any project. They should be made aware of any project changes including timelines, budget or scope changes. Grantor approval is necessary prior to making any changes that could present a compliance issue.
- Documentation is vital to the success of every project. Each grant agreement should be carefully reviewed for specific compliance and documentation requirements.
- Copies of all monitoring reports and related correspondence should be provided to the Grants Department. This includes formal on-site monitoring, desk monitoring or other informal monitoring.
- Any instances of possible or actual noncompliance with grant requirements, abuses or fraud, suspicions or otherwise, should be immediately brought to the attention of the Grants Department.
- Although foundation or corporate grants may not be subject to the federal regulations described in this manual, adherence to County policies remains obligatory, including approval of the BOCC prior to application submittal.

Pre and Post Award Administration



GRANT IDENTIFICATION

The Grants and Special Projects Department will maintain a database of grant opportunities to include due dates, maximum grant award, and other pertinent information. SRC Departments should notify the Grants and Special Projects Department if they are interested in grant assistance. The Grants staff can provide assistance in searching for grant opportunities.

If a department is interested in grant funding opportunities, they should contact the Grants Department and provide the following information:

- A brief description of project or program need including any relevant information such as desired timelines for implementation;
- An estimated project or program budget to include grant funding needed and availability and source of any matching funding;
- Any technical terminology or other relevant information that may be helpful in searching for possible grant opportunities.

Agency websites and list serves: Many agencies have list serves to which interested parties can subscribe to receive the latest grant opportunities and information. Simply visit the respective agency office website and subscribe per instructions. Additionally the Grants Department regularly utilizes the following:

- eCivis: <http://www.ecivis.com>

The Grants and Special Projects Department maintains a subscription to this grant management website which includes access to online training, grant opportunity research, as well as thousands of opportunities from all types of granting agencies.

- Grants.gov: <http://www.grants.gov>

Grants.gov is the clearinghouse for all federal grant opportunities, and allows organizations to electronically find and apply for more than \$400 billion in federal grants. Creating a grants.gov profile will provide perpetual notice of grant opportunities from federal agencies.

- State of Florida www.myflorida.com/direcory/ search State of Florida Grants by Agency.

GRANT SEEKING PROCESS

Prior to the application of a grant, the following steps should be taken:

1. Analysis of the specific objectives and funding needs of the county
2. Identification of the expected results or benefits of the program

The following factors should be considered:

The pre application assessment should take into consideration the following factors:

a. Financial

1. Total anticipated project cost
 - Is the proposed program budget sufficiently detailed? Have all direct cost items been covered in the budget (salaries, supplies and materials, equipment, travel, computer services, consultants, etc.)
 - Indirect Cost Rates – Are indirect or administrative costs reimbursable?
2. Match requirements and sources
 - Are matching share requirements accurate and consistent with the County's plans and budget?
3. Insurance
 - Does the program or project have any special property, liability, or other insurance requirements?
4. Staffing requirements
 - Will the program or project require additional staff? Is such expansion consistent with the County's plans and budget?
5. Cash flow needs
 - Will the terms of the grant agreement meet the cash flow needs of the program or project?

6. Long-term commitments
 - Does the agreement commit the County to continue the program or project beyond the period of program funding? If so, do budgeting and planning give appropriate support to all such commitments?
7. Programmatic
 - Does the program or project align with County strategic priorities?
 - Is there the capacity to administer the financial and administrative aspects of the grant?

Refer to the grant opportunity summary or guidelines to obtain important information about the grant opportunity. This reference source may also be referred to as the NOFA (Notice of Funding Announcement) or NOFO (Notice of Funding Opportunity), RFP (Request for Proposals) or other similar terminology, and provides the following information:

- Types of projects to be funded
- The amount of funding available
- The contents required for the application
- Program officer contact information
- Program time frame and other pertinent information

APPLICATION PREPARATION

Pre-Application Preparation

There are certain essential elements necessary for successful submission of a grant application that must be attended to prior to filling out the grant application. Some grants require electronic submission and registration or familiarity with a specific web portal. The following are examples of the various different web based portals in which the County is registered:

- a. Grants.gov
- b. The System for Award Management (S.A.M.)
- c. The Automated Standard Application for Payments (ASAP)
- d. FloridaPA.gov
- e. Grant Solutions (for the RESTORE Act)

Duns Number

- The federal government requires that all applicants for federal grants, cooperative agreements, and subawards, with the exception of individuals other than sole proprietors, have a Data Universal Numbering System (DUNS) number to better identify organizations that are receiving funding under grants and cooperative agreements, and to provide consistent name and address data for electronic grant application systems.
- County DUNS number: 077906444
- County EIN: 59-6000842

WRITING THE PROPOSAL

It is necessary to read the grant guidelines thoroughly. Grant application guidelines identify what to include in the respective grant proposal, and it is critical to understand the grantor's requirements and to follow grant application guidelines explicitly. Structure, attention to specifications, concise writing, and a reasonable budget with justification narrative are the critical elements to be considered during the writing stage.

Grant guidelines typically identify

- Submission deadlines
- Grantee eligibility
- Funding goals, priorities, and ceilings
- Proposal format: forms to use, page limitations, page margins, line spacing, etc.
- Budgets and budget justification narrative
- Proposal evaluation process, criteria, timetables
- Point(s) of contact
- Allowable supplemental materials, such as Letters of Support
- Any and all other submission requirements

SUBMITTING THE GRANT

When preparing a grant application, it is necessary be mindful of a timeline that may include coordination with other stakeholders.

- Public Hearings or Community Engagement Meetings
 1. Many grant applications include requirements for public hearings. In such instances, advance planning is required to allow for notification of a public hearing, scheduling of the public hearing, coordination with external entities' meeting schedules, and adequate time for preparation of minutes or thank you letters.
 2. All grant applications must be approved by the BOCC. Agenda items must be submitted no later than Wednesday the week prior to a BOCC Meeting.
- Depending on the nature of the grant, coordination with other SRC Departments may be necessary. Examples include:
 1. Drawings or surveys from Engineering Department
 2. Cost estimates from Public Works Dept
 3. Budgetary information from the Budget Department
 4. GIS or other technical information from the Information Technology Department
 5. Contract review by County Attorney
- Important deadlines
 - Pre-application deadlines – some grants require approval of a pre-application
 - Letters of Intent – some grants require that letters of intent be submitted prior to grant application
 - Final application deadlines – be sure to consider specific delivery or receipt language such as post mark or delivery deadlines

CHAPTER 4: 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.

The award notification, review, and acceptance process has three components: (1) award notification, (2) award review and negotiation, and (3) BOCC award acceptance and appropriation of grant funds.

BOCC ACCEPTANCE AND BUDGET AMENDMENT

Below are the procedures for grant acceptance:

1. BOCC agenda item
2. Budget amendment
3. If necessary, establish project codes with finance.
4. After approval by BOCC, follow grant instructions for execution process.
 - a. Deliver grant agreement to Legal Department to obtain signatures from BOCC Chair.
 - b. Send originals to grantor for execution via mail or electronic.
 - c. Request that two original fully executed documents are returned to the County.
5. Prepare and maintain a file that will be available for inspection by any state and federal auditors, the County's independent auditor, and the County Auditor.
6. Distribute Fully Executed Agreements.
 - a. Clerk's Office – Original
 - b. County Attorney's Office – Original (Or copy if no second original)
 - c. Finance Department - Copy
 - d. Grants Department File - Copy
 - e. Grants Department Audit File – Copy
 - f. Electronic copy scanned to X-drive
 - g. Managing Department Grant File - Copy

CHAPTER 5: MANAGING THE GRANT

The Grants and Special Projects Department is responsible for ensuring that all grantor and County regulatory and budgetary policy and procedures are followed and that grants awarded to the County end successfully and produce meaningful outcomes. The grant manager is the liaison with the grantor regarding program performance, operational requirements and monitoring, and will supervise all programmatic (operational) aspects of the grant in accordance with the terms and conditions of the grant, ensuring preparation and submission of all required program reports by or before the specified deadlines in the award agreement.

FISCAL ACCOUNTABILITY

Once the award is made, the grant manager must ensure that the program is properly managed and controlled. Specifically, the grant manager must monitor the progress of the program activities, and the receipt and disbursement of program funds. All invoices received must be checked for accuracy prior to submittal to Finance Department for payment.

Cost-Reimbursable

Cost reimbursable grants are the grant type most commonly received by the County. Reimbursement is requested after the expenditures have been paid. It is vital that correct, allowable charges are posted to the right project and that reimbursement requests are submitted in a timely manner. Copies of all invoices received, checks paid, cancelled checks, and any other pertinent information related the financial management of the grant must be maintained in the grant file, both in hard copy as well as electronic copy.

When a request for reimbursement is submitted, a notification email must be sent to Finance Department's Accounts Receivable with the reimbursement amount, account number, and any relevant backup documentation. ***Routine monitoring of expenditure and revenue reports in the Finance System is required to ensure reimbursements are received and properly credited.***

The Florida Accounting Information Resource (FLAIR) system can be used to track payments from the State of Florida at the following link: <https://flair.dbf.state.fl.us/dispapps/flair.shtml>. The County's EIN number is used to log in to the vendor system: 59-6000842.

Advance Funding/Cash Management Standards

Some awards may be received in advance of the project being performed, completed, or before expenditures are made. The reporting requirements are much the same as for cost-reimbursable grants. In addition, any remaining, unspent funds must be returned to the grantor. The following procedures must also be followed in accordance with §200.305 of OMB's Uniform Guidance:

- 1) The recipient must minimize the time between the transfer of funds from the grantor and the use of funds by the recipient. Advance payments must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the recipient in carrying out the purpose of the approved activity, project, or program. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the County for direct activity,

project, or program costs and the proportionate share of any allowable indirect costs. All federal awards must comply with §200.305 of the Uniform Guidance.

- 2) Advance payments of Federal funds must be deposited and maintained in insured accounts whenever possible.
- 3) The advance payments must be maintained in interest bearing accounts unless certain exceptions apply as outlined in §200.305(b)(8).
- 4) Interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services, Payment Management System, Rockville, MD 20852. Interest amounts up to \$500 per year may be retained for administrative expense.

COST PRINCIPLES

Receipt and Use of Grant Funds

- Grant funds may only be used for grant related expenses and expended within the period of performance identified in the grant agreement and pursuant to the cost principles set forth in §200.400 - §200.475 of OMB's Uniform Guidance.
- 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 a use of grant funds is explicitly identified as allowable in writing by the grantor in the grant award.
- All procurement activity associated with grant funded projects or programs shall follow the grantor and County policy and procedures for procurement of goods.
- All grant and related matching revenues shall be recorded in the County finance system.

Direct and Indirect (F&A) Costs

- §200.412-§200.415 define direct and indirect costs, and provide criteria for determining direct and indirect costs.
- Please contact the Grants Department for information related to SRC's Indirect Cost Rate Agreement for Federal funding.
- Grant specific guidance may also provide additional information related to indirect costs.

Method for determining whether costs are allowable

- Cost Principles §200.401 (a) must be used in determining the allowable costs of work performed by the non-Federal entity under Federal awards
- These principles must also be used by the non-Federal entity as a guide in the pricing of fixed price contracts and subcontracts where costs are used in determining the appropriate price.
- §200.402 defines the total cost of a federal award as the sum of the allowable direct and indirect costs less any applicable credits

Method for determining whether costs are reasonable

- Cost Principles §200.404(a-d) establishes the criteria for reasonable costs. A cost is reasonable if it:
 - Does not exceed that which would be incurred by a prudent person under the specific circumstances

- Is considered ordinary and necessary for operation or efficient performance of the award
- Shows sound business practice, arm's-length bargaining, and applicable federal/state/local laws
- Adherence to non-Federal entity's established policies and procedures regarding incurring costs (deviation of which unjustifiably increases cost of the federal award)

Method for determining whether costs are allocable

- Cost Principles §200.405(a-b) establishes the criteria for determining allocable costs. A cost is allocable if:
 - The cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with the relative benefits received
 - All activities which benefit from the non-Federal entity's indirect (F&A) cost including unallowable activities and donated services by the non-Federal entity or third parties will receive an appropriate allocation of indirect costs

Equipment and Real Property Management

- Equipment purchased with grant funds 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 procedures. The Finance Department maintains an inventory list for all County owned property.
- After the grant award is closed and equipment is no longer needed for its originally intended purpose, the grant manager shall request disposition instructions from the grantor and follow County policy and procedures for property and inventory control.

GRANT REPORTING

Every award has reporting requirements specified in the grant agreement. It is critical that all reports are complete, accurate, and submitted per the specified dates outlined in the agreement. Accurate and timely reporting is critical to maintaining a good relationship with the grantor. Requirements and procedures are established to ensure that grant funds are expended and accounted for in a method that provides accuracy, uniformity, and consistency. Late or inaccurate reports may negatively impact current or future funding and result in Single Audit findings.

Types of Reports

- Performance: Typically required on a quarterly basis. The recipient is required to regularly submit and retain performance reports that reflect grant funded operational progress as required by the grant agreement.
- Financial: The recipient is required to regularly submit and retain financial reports that reflect a grant fiscal health as required by the grant agreement.
- Close-out: Per grantor award terms and conditions, including time frames for action, the recipient department is required to submit all financial, performance, and other reports required in the grant conditions.

GENERAL STANDARDS FOR SUPPORTING DOCUMENTATION

Costs claimed by the County under its grants must be allowable, allocable, and reasonable, and adequate documentation to support charges to the grant must be maintained. Expenditures 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. Specifically, the cost principles established in §200.400-§200.475 of OMB's Uniform Guidance must be adhered to.

1. Grantees must submit documentation of eligible expenses and proof of payment for expenses incurred during the reporting period.
2. 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 federal and state audit standards. A supplemental accounting record may accompany the receipts and cancelled checks.

SPECIAL DOCUMENTATION REQUIREMENTS FOR DISASTER ASSISTANCE GRANTS

SRC Departments that are impacted by or participate in disaster assistance activities or clean up and repair must coordinate with the Grants Department to establish a system of collecting and maintaining documentation to support funding of these projects. This is particularly important after a federally declared disaster, in which case reimbursement is dependent upon proper and sufficient documentation.

Necessary documentation includes:

- All relevant invoices
- Payroll reports including pay rates and overtime rates
- Fringe benefit information provided by the Human Resources Department
- Equipment purchase, rental, and usage including dates, operator identification and pay rate, fuel charges
- Dated and labeled photographs reflecting damage, work site, and project completion
- Any other relevant documentation

FILE MANAGEMENT, ACCESS AND RETENTION

Files associated with a grant award must maintain a file structure that includes the important documents that chronicle the application, receipt of the award, and all management related documents and correspondence through award close out. Hard copy files must be maintained for each grant, and electronic files are strongly recommended.

- a. Proposal submission
 - Proposal guidelines and supporting legislation
 - Copy of the original submitted application
 - Information and data used in preparation of and support of the grant proposal
 - Public hearing notices and meaningful public comment
 - Any correspondence related to the proposal

- b. Award
 - Grant award letter with budget and special conditions
 - BOCC agenda item
 - Grant amendments, modifications, extensions, cancellations, and terminations and correspondence related to the award
- c. Financial
 - Account set up documents
 - Purchase orders
 - Invoices
 - Grantor approval for items such as budget reallocation, changes to scope, procurement, and contractor selection
 - Performance and fiscal reports on grant activities
 - Personnel time and effort worksheets
- d. Contracts
 - Debarment forms
 - Executed contracts
- e. Reports
 - All reports to grantor – progress, technical, quarterly, annual, final, etc.
 - Evaluation forms and data
 - Compliance monitoring reports from desk audits or on-site visits
 - Project Closeout documents
 - Any other relevant communication with grantor
- f. Subrecipient Documents (if applicable)
 - Subrecipient risk assessment documentation
 - Subrecipient contract
 - All site visit documentation
 - Any subrecipient correspondence
 - All financial, legal and procurement records related to the subrecipient's execution of the grant funded project
- g. All other pertinent or necessary information to show compliance with the award terms and conditions

GRANT MODIFICATIONS, EXTENSIONS, OR CANCELLATIONS

During the course of a grant's lifetime, there are times when changes are necessary to periods of performance, budget or the project scope of work. Most of these changes, typically called grant amendments or modifications, are allowable, but it is important to follow the procedures written in the grant agreement or in the guidelines provided by the grantor. These changes must be pre-approved by the grantor before they are considered eligible.

Grant Modifications

Written confirmation from the grantor is necessary before any money is spent on items different from what was approved in the original budget. Also, project activities that deviate

from those originally proposed in the grant application shall be documented and receive prior approval from the grantor before instituting these changes.

Extensions

- Many grants allow for at least one no-cost time extension to complete a project, if necessary. These requests must be documented and written approval must be received from the grantor, usually in the form of a grant amendment/modification.
- Contract extensions may require BOCC approval.

Cancellations

In the event that a grant must be returned to the grantor prior to project initiation, BOCC approval of the cancellation is necessary, and appropriate procedures for cancellation specific to the grant must be followed.

GRANT CLOSEOUT

The grant closeout is a critical piece in the lifecycle of a grant, and 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 address the physical completion of work, and the administrative requirements and financial requirements for closeout. If an official letter or other formal document that references successful closeout is not provided, please request something in writing from the grantor for grant documentation purposes.

File Retention

- Some grant agreements specify a file retention date.
- Federal grants require retention of files for three years from grant close out date.
- Records for real property and equipment acquired with federal funds must be retained for three years after the final disposition date.

CHAPTER 6: GRANT CONTRACTING

The County may encounter situations where it does not have the workforce capacity to adequately fulfill all of the grant objectives and must seek out vendors or contractors to perform certain functions. These activities will be obligated in the form of a contract.

CONTRACT INFORMATION

A contract is for the purpose of obtaining goods and services for an entity's own use and creates a procurement relationship with the contractor.

Request for Qualifications (RFQ) and Request for Proposals (RFP)

1. When preparing an RFQ or RFP for a grant funded project, it is essential to incorporate any requirements specific to the grant agreement. Some grants include specific processes for procurement, evaluation, and selection of contractors. Failure to adhere to these requirements can result in loss of funding.
2. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any responses to RFPs must be considered to the extent practical.
3. Proposals must be solicited from an adequate number of qualified sources.
4. There must be a written method for conducting technical evaluations of the proposals received and for selecting recipients.
5. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.
6. Competitive proposal procedures may be used for qualifications based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.
7. Affirmative steps must be taken to include small and minority and women's business enterprises, and labor surplus firms as described in the next section.

SRC ordinance no. 2002-13 establishes that RFP's and RFQ's shall be advertised at least 2 weeks prior to the date established for receipt of bids in some newspaper of general circulation in the County. Actual practice typically dictates a minimum of three-week advertisement period, so it is advisable to plan ahead and consult with the Procurement Department.

Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms

§200.321 of the Uniform Guidance requires that all necessary affirmative steps must be taken to assure that minority business, women's business enterprises, and labor surplus area firms are used when possible including:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists

2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and Minority Business Development Agency of the Department of Commerce
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in this section

In order to demonstrate compliance with these requirements, the following steps must be taken by grant managers:

1. The requirements of §200.321 shall be included in any RFPs or RFQs such that all contractors must take affirmative steps.
2. List of local minority business and women's business must be downloaded and maintained in the grant file. All minority and women's businesses must be notified of RFP or RFQ.

FEDERAL AWARD REQUIREMENTS

Additionally, for federal awards, the procurement requirements set forth in the Uniform Guidance §200.318-200.321, §200.323, §200.324, and Appendix II must be followed.

SUSPENSION AND DEBARMENT

Santa Rosa County and its subrecipients shall not award grant assistance to applicants that are debarred or suspended, or otherwise excluded from or ineligible for participation in federal assistance programs under Executive Order 12549.

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 federal agency has government-wide, reciprocal effect.

1. The managing department shall ensure that the federal Excluded Parties List System (EPLS) site and the state Convicted/Suspended/Discriminatory/Complaints Vendor Lists are checked prior to entering into any contractual relationship or use of services.
 - a. The System for Award Management (SAM) is the official federal EPLS. It is accessed at: <https://www.sam.gov/portal/public/SAM/#1>.
 - b. Convicted, Suspended, Discriminatory, Complaints Vendor Lists for the State of Florida are accessed at: http://www.dms.myflorida.com/business_operations/state_purchasing/vendor_informatio
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Contract Development, Execution, and Distribution

Once a contractor has been selected and approved by the BOCC, the grant manager must coordinate with the County Attorney's Office to ensure the contract contains all standard language for SRC contracts, details specific to the RFP or RFQ including cost, period of performance, deliverables, and dates of completion as well as any other requirements of the grant agreement. The Grant Manager will need to forward all information to be included in the contract to the County Attorney's Office as soon as it is available.

Once a contract has been executed, originals and copies shall be distributed as follows:

- 1) Clerk's Office – Original
- 2) County Attorney's Office – Original (Or copy if no second original)
- 3) Finance Department - Copy
- 4) Grants Department File - Copy
- 5) Grants Department Audit File – Copy
- 6) Electronic copy scanned to X-drive
- 7) Managing Department Grant File - Copy

CHAPTER 7: SUBRECIPIENT INFORMATION

A subrecipient is an entity that expends funds received from a pass-through entity to carry out a program, but does not include an individual that is a beneficiary of such a program.

Characteristics of a subrecipient:

- Receiving entity determines who is eligible to receive financial assistance
- Has its performance measured against whether the objectives of the program are met
- Has responsibility for programmatic decision making
- Has responsibility for adherence to applicable program compliance requirements
- Uses the funds to carry out a program of the organization, as opposed to providing goods or services for the benefit of the pass-through entity

SUBRECIPIENT MONITORING

SRC subrecipient monitoring shall follow the regulations and guidance set forth in §200.330 -§200.332 of the Uniform Guidance for Federal Awards. SRC shall also adhere to the requirements for pass-through entities as described in these sections, including:

- 1) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward. Required information can be found in §200.331.
- 2) Evaluate each subrecipient's risk of noncompliance with Federal, State, and County statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring as described below:
 - a. The subrecipient's prior experience with the same or similar awards.
 - b. The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F of the Uniform Guidance for Federal Awards, and the extent to which the same or similar subaward has been audited as a major program
 - c. Whether the subrecipient has new personnel or new or substantially changed systems
 - d. The extent and results of Federal awarding agency monitoring (e.g. if the subrecipient also receives Federal awards directly from a Federal awarding agency.)
- 3) Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in §200.207 of the Uniform Guidance for Federal Awards and below.
 - a. Requiring payments as reimbursements rather than advance payments
 - b. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance
 - c. Requiring additional more detailed financial reports
 - d. Requiring additional project monitoring
 - e. Requiring additional technical or management experience
 - f. Establishing additional prior approvals

- 4) If additional conditions are imposed on a subrecipient, the pass-through entity must notify the applicant of the following.
 - a. The nature of the additional requirements
 - b. The reason why the additional requirements are being imposed
 - c. The nature of the action needed to remove the additional requirement, if applicable
 - d. The time allowed for completing the actions, if applicable
 - e. The method for requesting reconsideration of the additional requirements imposed
- 5) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.
- 6) Utilize the monitoring tools as described below dependent on the assessment of risk.
 - a. Providing subrecipients with training and technical assistance on program-related matters
 - b. Performing on-site reviews of the subrecipient's program operations
 - c. Arranging for agreed-upon procedures engagements as described in §200.425 of the Uniform Guidance for Federal Awards
- 7) Verify that every subrecipient is audited as required by Subpart F of the Uniform Guidance for Federal Awards when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501
- 8) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.
- 9) If it is determined that noncompliance cannot be remedied by imposing additional conditions, consider taking enforcement action against noncompliant subrecipients as described below.
 - a. Temporarily withhold cash payments pending correction of the deficiency
 - b. Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance
 - c. Wholly or partly suspend or terminate the award
 - d. Recommend to Federal awarding agency initiation of suspension or debarment proceedings
 - e. Withhold further awards for the project or program
 - f. Take other remedies that may be legally available

CHAPTER 8: YEAR END PROCEDURES

ANNUAL BUDGET CARRYFORWARDS

Each fiscal year-end (September 30), all grant managers must review the status of reimbursement requests and calculate any required revenue accruals. For grant eligible expenditures for which the corresponding revenue has not yet been received, a revenue accrual must be recorded within the Finance System. When the reimbursement is actually received, the accrual will be satisfied via Finance action. (When the revenue is received, it is necessary for the grant manager to effectively communicate to the finance department that the revenue received is an accrual from the previous fiscal year so that it is credited appropriately).

All departmental grant managers should report any expected revenue amounts for grant expenditures made prior to September 30 but for which the revenue might not be received by the close of 13th period (October 31). Any applicable period ending September 30th invoices that may be paid in 13th period (October) must be considered.

The reported grant revenue may be less than the total of eligible expenditures. For instance, if a grant reimburses based on a 50% cost share and there is a \$10,000 invoice that has not yet been requested for reimbursement, the accrual would only be \$5,000. Any maximum reimbursement cap amounts must also be considered.

All Departmental Grant Managers shall report this information to the Grants and Special Projects Department on the form found in Appendix B of this manual, along with revenue and expenditure audit trails, prior to submitting to Finance Department and within three weeks of fiscal year end.

FISCAL YEAR END EXPENDITURE GRANT DETAIL FORM

The fiscal year end expenditure grant detail form (Appendix C) must be completed for each grant for which expenditures were made at the conclusion of each fiscal year. This form shall be submitted annually to the Grants Department no later than December 1.

ANNUAL AUDIT

Information for each fiscal year is typically available 6-8 months following the conclusion of a fiscal year. Grant agreements may require submission of hard copy or electronic copy of the audited financial statements once available. The Grants Department coordinates distribution of the audited financial statements, but individual grant departments are responsible for ensuring compliance with the grant agreement. The Audited Financial Statements including Single Audit and CAFR can be found at the following link: <http://www.santarosa.fl.gov/budget/audits.cfm>.

APPENDIX A

Grants Contact List:

Emergency Management, Homeland Security Grants, CERT

Emergency Management Department
4499 Pine Forest Road
850.983.5360

Parks and Recreation Grants, RESTORE Act, Flood Mitigation Assistance, Defense Support Grants, Hazard Mitigation, Public Assistance (Disaster Recovery)

Grants and Special Projects Department
6495 Caroline Street
850.983.1848

Transportation Grants, Planning Grants

Development Services Department
6051 Old Bagdad Hwy
850.981.7000

Housing Grants

Housing Department
6051 Old Bagdad Hwy
850.981.7076

Airport Grants, Mosquito Control Grants, Transportation, Sidewalks

Engineering Department
6051 Old Bagdad Hwy
850.981.7100

Library Grants

Library Administration Department
850.981.4065

Economic Development Grants

Economic Development Office
850.623.0174

Court Related Grants, Domestic Violence Grants

Courts Administration
850.595.0379

Justice or Crime Victim Assistance Grants

Sheriff's Department
850.981.2140

APPENDIX B

ACCRUAL REPORTING FORM

Grant Revenue Accrual Request Form

Instructions:

Please complete one form for each grant that you manage and for which an accrual is needed. Completed forms and relevant documentation should be submitted to the grants department for review approximately three weeks after the end of each fiscal year.

Name/Department: _____

Grant Agreement/Contract # _____

Grant Program Name: _____

Project Title or other specific project identifier: _____

Fund Number: _____ (Refer to the Budget Amendment for this information)

Revenue Account _____ (Refer to the Budget Amendment for this information)

Dept and Expenditure Account(s) _____ (Where the invoices are paid from)

Accrual Amount (Amount earned but not yet recieved) _____

As of today, has a request for reimbursement been made that includes the amount referenced above? Yes _____ No _____

If yes, please provide a copy of the request for reimbursement.

If no, please provide details on when the request is expected to be made:

Any other comments?

Appendix C

GRANT DETAIL FORM

Fiscal Year End Expenditure Grant Detail Form

Insert Fiscal Year _____

This form should be completed for each grant for which expenditures were made at the conclusion of each fiscal year.

Date: _____ Department responsible for implementation: _____

Person providing information: _____ Email: _____ Phone: _____

Contract/Grant Agreement Number: _____

Date of agreement execution: _____ expiration: _____

Grant/Program Title: _____ Project Title: _____

Brief Project Description: _____

CFDA # or CSFA #: _____ Type of Assistance: _____ (Federal or State)

Grantor (Federal or State Agency): _____

Pass-through Grantor (Federal or State Agency): _____

What is the status of this grant? (check all that apply)

- Final reimbursements made
- Project/program completed prior to fiscal year end
- Project/program underway
- Project/program not started
- Other _____

Year-end Grant Eligible Expenditures: _____

Is there a match requirement? If yes, what percentage? _____

Year-end Grant Reimbursement: _____ (Expenses x grant percentage reimbursement)
(Note this amount may or may not have been received in the fiscal year).

Prior year Expenditures: _____ (pull from prior year Audit Schedule)

Expenditure Account # (Include Fund and Dept #): _____

Revenue Account # (Including Fund): _____

Please be sure to provide a copy of the grant agreement, any modifications or amendments and any monitoring reports that occurred during the fiscal year.

Notes:

