

SECTION 22. FISCAL SERVICES**22.20 GRANTS MANAGEMENT**

A. GENERAL POLICY. It is the policy of Seminole County (the "County") to encourage the pursuit of Federal, State, and private foundation grants-in-aid. Grants shall comply with OMB Circular A-133, "Audits of States, Local Governments, and Non Profit Organizations"; and/or Florida Statutes Section 215.97, "Florida Single Audit Act"; and Rules of the Auditor General, Chapter 10.550, "Local Government Entity Audits." [OMB Circular A-133 applies if the County receives more than \$500,000 from all Federal sources in a fiscal year.] Grants offer an important source of funding and supplement to County resources. As a matter of equity, it is the goal of the County to ensure that its taxpayers receive a fair share of Federal and State grants which are funded through their tax dollars.

B. DEFINITIONS.

(1) Budget Amendments – Modification of the originally adopted budget either through formal action of the Seminole County Board of County Commissioners ("BCC") or through delegated authority by the BCC.

(2) Competitive Grant Awards – Grant awards received as a result of a competitive application and review process. This process includes a grantor's evaluation of applications submitted by a variety of agencies and selections made according to established criteria.

(3) Entitlement Grant Awards – Grant awards the County has the right or guarantee to receive as a local government entity providing public services as defined by the grantor. Award amounts are most often based upon a formula set by the grantor and received by the County on an annual basis.

(4) Fixed Assets – A long-term asset such as equipment or vehicles.

(5) Grant – Financial assistance pursuant to written agreements/contracts to carry out a specific purpose.

(6) Grantee – The recipient of a grant.

(7) Grantor – The provider of a grant.

(8) Non-Material Amendments/Modifications – Changes to previously approved agreements/contracts not involving additional commitment of County resources (i.e. timeline extensions and minimal changes in project scope).



C. RESPONSIBILITIES.

(1) Grants Administrator. The Fiscal Services Department is responsible for countywide grant administration. Within Fiscal Services, it is the responsibility of the Grants Administrator to promote grants awareness; establish grant procedures; facilitate department grant coordination; identify and disseminate grant opportunities; prepare and submit grant-related requests of the BCC; establish and maintain a grants database; create and distribute quarterly activity reports; and coordinate the activities of the Grants Review Team.

(2) Grants Review Team. The Grants Review Team (“GRT”) is a group of County staff members purposed to review potential grant opportunities and make recommendations to the County Manager and BCC regarding all grant applications. The Grants Administrator is a permanent member of the team. Other members shall be selected by the County Manager to represent the departments under the BCC. The participation of the Sheriff’s Office and other elected officials receiving grant awards requiring BCC action is also encouraged.

D. PROCEDURES.

(1) Application Submission Process. As the County receives notification of opportunities for competitive grants, the Grants Administrator and appropriate department shall be responsible to review the grant guidelines for compatibility with pending or proposed projects. All requests for application submissions shall be approved by the respective department director in writing and provided to the Grants Administrator for review by the GRT and approval of the BCC (when applicable) prior to submission to the grantor. Entitlement grants are excluded from the application submission process.

(a) Grants Review Team Review. The GRT shall conduct a review of the requests for grant application submissions, which may include a presentation or discussion with the applying department. Such review shall include, but is not limited to, an evaluation of the actual cost of the grant including administrative and indirect costs; operating and maintenance costs; staffing; cost/benefit analysis; outcome(s) or objectives to be achieved by the grant; and plans for continuation of services following termination of grant.

(b) Approval to Submit. Coordinated by the Grants Administrator, approval by the BCC to submit or resubmit grant applications shall be required for all funding requests greater than \$50,000 or if the terms and conditions of the grant are a component of the application. Funding requests equal to or less than \$50,000 and not containing the terms and conditions for award and implementation shall require County Manager approval.

(c) Application Preparation. The appropriate department shall be responsible to prepare and submit applications within the required timeframe.



Assistance from a contracted grant consultant and/or the Grants Administrator is encouraged. Proposed grant applications must be provided to the Grants Administrator for review prior to submission.

(d) Grant Application Signature Authority. In conjunction with the delegation authority stated in BCC Administrative Code Section 1.10, authority to sign grant applications is hereby delegated to the County Manager unless the Chairman's signature is required by the grantor or as otherwise provided in paragraph (D)(1)(b) of this Section.

(2) Grant Agreement Approval.

(a) Grant Agreements. Following review by the County Attorney, agreements in acceptance of both competitive and entitlement grant awards shall be approved by the BCC and executed by the Chairman. The Grants Administrator shall coordinate legal review and subsequent BCC approval for all grant agreements, except those agreements for which this coordination is deemed more appropriate at the department level. Anticipated entitlement funds received on an annual basis, should be included in the budget preparation to the fullest extent possible.

(b) Amendments to existing grant agreements. Modifications impacting the commitment of County resources shall require BCC approval. Non-material changes, as defined in Section B(8), shall be approved and executed by the County Manager or his/her designee. Requests for approval of all amendments to existing grant agreements shall be coordinated by the Grants Administrator.

(3) Budget Amendments. Budget Amendments to allocate the anticipated revenue and expenditures applicable to the grant awards shall be approved by the BCC. This should occur in conjunction with or subsequent to the approval of grant agreements/contracts. This policy applies to cash and non-cash awards alike.

(4) Coordination with County Departments/Divisions

(a) Fleet. All fleet-related equipment purchases made using grant funds shall be approved by the Fleet and Facilities Management Division and shall conform to their specifications, policies, and procedures. This policy is also applicable in cases where an outside organization is the procuring agency for fleet equipment received by the County.

(b) Human Resources. Positions for any personnel hired using grant funds shall be posted and filled according to Seminole County's Personnel Policies and Procedures and Seminole County's Equal Employment Opportunity Plan. Personnel shall be advised that grant-funded positions are only funded for the duration of the grant.



(c) Information Technology. All computer related equipment and software purchases made using grant funds shall be pre-approved by the Information Technology Division and shall conform to their specifications, policies and procedures.

(d) Purchasing and Contracts.

(i) Use of Grant Funds. All products and services procured using grant funds shall be made through the Purchasing and Contracts Division; and shall comply with BCC Administrative Code Section 3.55. The department shall ensure requisitions include all applicable grantor flow-down requirements (i.e. Davis-Bacon Act, etc.) so that the proper clauses are reflected in the purchase documents.

(ii) Fixed Assets. The department shall notify the Grants Administrator and the Purchasing and Contracts Division when fixed assets are awarded in lieu of or in addition to actual funds. In accordance with Section 3 above, a budget amendment shall be approved by the BCC to allocate the value of the fixed assets. Upon receipt of the assets, the department shall notify the Purchasing and Contracts Division and provide all documentation required to record the assets (i.e. delivery documentation, copies of purchase orders, and documentation necessary to obtain title to equipment). This policy is also applicable in cases where an outside organization is the procuring agency for fixed assets received by the County.

(5) Grant Compliance. The department shall ensure compliance with all grant requirements as detailed in the respective grant agreements. The department shall prepare and submit financial and project reports, reimbursement requests, close out reports and any other items required by the grantor. All mandated documents shall be filed with the grantor in accordance with their required format, content requirements, and deadlines.

(6) Withdrawal. Should it be determined by the County Manager after consultation with the Grants Administrator and the recipient department that the County is unable to fulfill its obligation to a grantor, withdrawal of an application or award shall be made. The Grants Administrator shall process all requests for withdrawals.

(a) Application Withdrawal. Should it become necessary to rescind a grant application following its submission to the grantor and prior to notification of award/denial, the BCC shall approve the County Manager or his/her designee to execute a letter of withdrawal. Retraction of funding requests equal to or less than \$50,000 shall solely require the County Manager or his/her designee approval and execution of the letter.

(b) Award Withdrawal. For competitive grants, the BCC shall approve termination of the previously approved agreement in the manner appropriate to the grant award. A budget amendment to remove the grant-related revenue and expenditure allocations shall be presented for approval by the BCC.

(7) File Maintenance. The Grants Administrator shall establish and maintain the official files for all competitive and entitlement grant awards. Each file shall contain copies of documents such as the grantor regulations; approved application; award notification; correspondence with the grantor; agreements; amendments; and reports (financial, programmatic, and close out). Documentation shall be provided by the department for the purpose of this policy.

E. PARTNERSHIPS WITH OUTSIDE AGENCIES. Requests from outside agencies (“requestor”) for County partnership to apply for a grant shall be initially approved in writing by the director of the department whose job functions most closely correlates with the project for which the requestor is seeking grant funds. All requests for partnership with the County to submit a grant application shall be submitted to the Grants Administrator. BCC approval to partner and apply shall be obtained upon determination by the department director and Grants Administrator that the criterion below is met.

All requests for partnership shall compliment the County’s strategic plan, mission, objectives and values towards providing services to its citizens. Identification of such alignment by the requestor is required. An evaluation of the agency and project for which grant funding is being sought shall be completed by the County to ensure conformity. Requests submitted by nonprofit agencies must be accompanied by verified 501(c)3 status with the Internal Revenue Service and active registration with the State of Florida. The County reserves the right to deny a partnership request.

(1) County as Grantee.

(a) The project for which grant funding is being pursued shall provide for a specific, identifiable gap or need within the County.

(b) The amount requested of the grantor agency shall be equal to or greater than \$25,000.

(c) In most cases, any cash match required by the grantor shall be provided by the requestor. County match of cash or in-kind services will be considered on a case-by-case basis.

(d) Financial statements, project budgets, and any other essential documents relative to the requestor’s financial stability and ability to implement the respective project shall be provided to the County by the requestor. Requests for partnership and application submission shall not be presented to the BCC for consideration if the above or requested documents are not provided or if they are not provided within the timeframe required by the County.

(e) Relative to the project for which grant funding is being pursued, information and documentation as required to complete the grant application shall be provided by the requestor to the County and/or its designee within the timeframe



required by the County. The requestor's failure to provide requested information and documentation essential to the purpose of the partnership shall result in denial of the request.

(f) The requestor shall consent to County oversight of the project for which grant funding is being pursued; and, upon notification of grant award, shall enter into a subcontract agreement which would detail the responsibility of each participating agency. Oversight shall include both program and financial activities under the grant and require access to all relevant documents and client files for auditing purposes.

(g) Seminole County reserves the right to retain a portion of the grant award as an administrative fee for oversight and management of the grant if allowable by the grantor. The amount requested for this oversight shall take into consideration the amount and extent of staff time to assist in execution, monitoring and review.

(2) Outside Agency as Grantee. Partnerships with the County are limited to municipalities, other counties, and public academic institutions. Requests by nonprofit agencies meeting the above requirements shall be considered only when attempting to secure a grant for a project having significant benefit to the citizens of Seminole County as determined by the department director, County Manager, and BCC.

(a) Upon approval of the BCC, letters of support shall be executed by the County and provided to the requestor for inclusion in the grant application. In most cases, any cash match required by the grantor shall be provided by the requestor. County match of cash or in-kind services will be considered on a case-by-case basis.

(b) County staff shall provide information and technical assistance to requestors towards their preparation of grant applications if the project for which funding is being requested is an existing program financially supported by the BCC.

F. AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 (ARRA). The ARRA ("Recovery Act" or "Act") was signed into law by President Obama on February 17, 2009. The Executive Office of the President/Office of Management and Budget states the purpose of the Act is "to preserve and create jobs and promote economic recovery, assist those most impacted by the recession, provide investments needed to increase economic efficiency by spurring technological advances in science and health, invest in transportation, environmental protection, and other infrastructure that will provide long-term economic benefits, stabilize State and local government budgets, in order to minimize and avoid reductions in essential services and counterproductive State and local tax increases." Recipients are instructed to use grant funds in a manner that maximizes job creation and economic benefit.

The County shall implement those policies and procedures as are necessary to best assure Recovery Act dollars are applied for the benefit of its citizens and in compliance with all requirements of the Act. The Grants Administrator shall monitor and

communicate to all applicable departments any information issued by the Office of Management and Budget or by other credible sources relating to the Act.

(1) **Recovery Act Compliance.** In addition to the Grant Compliance procedures detailed in Section D(5) hereto, recipient departments shall comply with all Recovery Act requirements as detailed in the Office of Management and Budget issued guidance and in the grant agreement. Such requirements include, but are not limited to, the following:

- Davis-Bacon Act
- Buy American Rule
- Jobs Created and Retained Data Computation
- Reporting in FederalReporting.gov

(2) **Recovery Act Accountability.** The Grants Administrator shall coordinate a system of accountability for the management of ARRA funded projects and compliance with the requirements listed above. Included in the system are:

- ARRA Compliance Oversight Committee – comprised of representation from the County Manager’s Office, the County Attorney’s Office, the Fiscal Services Department Director, the Purchasing and Contracts Division Manager, and the Grants Administrator for establishment of procedures and general oversight of ARRA compliance.
- Project Management Procedures – required to be prepared and maintained by each applicable department detailing procedures to ensure compliance with ARRA requirements.
- Clerk of the Court – provided quarterly reports, compliance procedures and other ARRA compliance and project information for review as needed.

G. AUTHORITY. Resolution 2009-R-9 adopted January 13, 2009
Resolution 2010-R-250 adopted December 14, 2010