



ADMINISTRATIVE PROCEDURES

Procedure Number: 5-1

Effective Date: 4/19/2019

Revision Date: _____


County Administrator

SUBJECT: GRANT APPLICATION APPROVAL

DEPARTMENT RESPONSIBLE: GRANTS MANAGEMENT & INNOVATION

1. STATEMENT

Grants are critical revenue sources that supplement or fully fund many Pima County programs and projects. However, the acceptance and use of grant funding obligates the County to undertake extra responsibilities, commit valuable resources, and comply with conditions that typically impose requirements beyond normal County operations.

A uniformly-applied Grant Application Approval Procedure provides reasonable assurance that Grant Applications are vetted such that, if awarded, the County has the capacity to: effectively implement the grant; remain in compliance; and avoid unnecessarily burdensome obligations, as well as exposure to undue liabilities.

All County departments, elected officials, courts, agencies, offices, and/or units ("County Entities") must comply with the Grant Application Approval Procedure in a timely and thorough manner.

2. DEFINITIONS

Authorized Organizational Representatives (AOR) – Individuals authorized to apply for and accept Federal grants using the Federal grants.gov application and award platform.

Contract – A legal instrument by which the County purchases property, goods, or services needed to implement a grant. Contracts establish a procurement relationship with the contractor.

Contractor – An entity which provides procured property, goods, or services under a County contract.

County Entity – A department, elected official, court, agency, office and/or unit.

Grant - An award that generally does not need to be paid back and is given to finance a particular activity or facility. For the purposes of this procedure, the term "Grant" is defined to include, but not be limited to: Cash; Cooperative Agreements; Non-Cash Contributions; Donations of Property (including Donated Surplus Property); Technical Assistance; Direct Appropriations; Food Commodities; Loans; Loan Guarantees; Interest Subsidies; and Insurance.

Grant-seeking Platform (Grant Portal) – A web-based grant portal or database used by grantors to solicit and accept applications for private, local, state, Tribal, Federal, or other funds.

Grant Application - Any type of proposal for private or public financial assistance including, but not limited to: Grants; Cooperative Agreements; Non-Cash Contributions; Donations of Property (including Donated Surplus Property); Technical Assistance; Direct Appropriations; Food Commodities; Loans; Loan Guarantees; Interest Subsidies; and Insurance.

Subaward – A legally-binding commitment of grant funds made to an outside entity for the purpose of carrying out a portion of the grant award. Subawards create a grantee relationship with the subrecipient.

Subrecipient (Sub-grantee) – A receiver of pass-through grant funds from a grantee rather than receiving funds directly from the grantor. Subrecipients are required to complete objectives of the grant award, and are required to follow all policies, rules, and terms of the original award in addition to any additional conditions required by the grantee.

3. PROCEDURE

All County Entities will consult with GMI on the following critical processes prior to submitting a Grant Application, including Grant Applications in which the Entity is proposed as a primary recipient, sub-recipient, sub-awardee, or more generally, as a project partner.

3.1. Evaluation and Approval of Grant Applications

- 3.1.1. County Entities must notify the County Administrator or designee and GMI (see GMI intranet site) when the Entity wishes to pursue a grant funding opportunity or participate as a subrecipient, sub-awardee, or partner in another entity's grant application.

Form available on GMI intranet:

- Grant Application Approval Request

- 3.1.2. Notifications should be submitted at least 15 business days prior to the application's submission deadline. If notification is received with less than 15 business days' lead time, the Entity may be prohibited from submitting the Grant Application subject to County Administrator or designee authorization.

- 3.1.3. After notification is submitted, GMI will collaborate with County Entity subject matter experts to generate a funding opportunity cost/benefit analysis and submit it to the County Administrator or designee. A current list of cost/benefit analysis considerations and processes will be posted on the GMI intranet site.

Forms available on GMI intranet:

- Cost/Benefit Analysis: New Funding Opportunity
- Cost/Benefit Analysis: Amendment

- 3.1.4. If two or more County Entities submit the same funding opportunity for approval, GMI will prepare comparative cost/benefit analyses for each.

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- 3.1.5. The County Administrator or designee will review the cost/benefit analysis, make the final decision regarding approval to pursue the funding opportunity, and communicate this decision to both the County Entity and GMI.
- 3.1.6. County Entities may begin work to prepare and develop a Grant Application while awaiting Grant Application Approval from the County Administrator or designee.

4. IMMEDIATE STEPS UPON COUNTY ADMINISTRATOR OR DESIGNEE DECISION

- 4.1. If the County Administrator or designee does not authorize the Grant Application Approval, all activities related to the preparation, development, and submittal of the Grant Application must immediately cease.
- 4.2. If the County Administrator or designee does authorize the Grant Application Approval, the following requirements apply:
- 4.2.1. GTAP. Creation of the Grant Application document (GTAP) in Advantage prior to submitting the grant application and notify GMI of its completion. GMI technical assistance is available upon request.
- 4.2.2. Intergovernmental Review. GMI will coordinate with the State of Arizona Single Point of Contact if intergovernmental review is required pursuant to Executive Order (E.O) 12372 and provide documentation to the Entity.
- 4.2.3. Proposal Review. GMI must review and validate all Grant Applications for consistency with grantor regulations and County policies, completeness, budget requirements, and other considerations prior to submission.
- Form available on GMI intranet:
- Proposal Review Checklist
- 4.2.4. Subrecipient versus Contractor Determinations: GMI must review the determination of whether grant funds distributed to other entities will be treated as subrecipient awards or procurement contracts as provided for in Administrative Procedure AP 5-3.
- Form available on GMI intranet:
- Checklist for Determining Subrecipient vs. Contractor Relationship
- 4.2.5. Data management. The Entity will consult with GMI on grant data collection and management, in compliance with County procedures, federal regulations, and grantor requirements.
- 4.2.6. Indirect costs. Unless prohibited by the grantor, County Entities must request indirect cost reimbursement in all grant applications, including applications in which the Entity is a prospective subrecipient. County Entities must use the indirect cost rates maintained in the County's most recent Departmental Indirect Cost Rate Proposal, which is published on the GMI intranet site. County Entities seeking exemption from this requirement must complete and submit a Request

for Waiver of Indirect Costs (see form on GMI intranet site), which must be approved by the County Administrator or his designee.

Form available on GMI intranet:

- Request for Waiver of Indirect Costs