



## ADMINISTRATIVE PROCEDURES

Procedure Number: 5-4

Effective Date: 4/19/2019

Revision Date: \_\_\_\_\_

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County Administrator

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SUBJECT: POST-AWARD GRANTS MANAGEMENT

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DEPARTMENT RESPONSIBLE: GRANTS MANAGEMENT & INNOVATION

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### 1. BACKGROUND

Grants are an essential source of County revenue, supplementing or fully funding many departmental programs and projects. The purpose of this procedure is to establish countywide standards for acceptance, implementation, and administration of grants. The County Grants Management & Innovation Department ("GMI") will be the Single Point of Contact for this procedure unless otherwise indicated below. GMI was created in 2018 to establish a central clearinghouse for the County's grant processes and to safeguard County compliance with the requirements of the Code of Federal Regulations or 2 CFR 200 and other applicable regulations.

All County departments, elected officials, courts, agencies, offices, and/or units ("County Entities") must comply with the Post-Award Grants Management Procedure in a timely and thorough manner. Please note that this procedure assumes adherence to Administrative Procedures: 5-1 (Grant Application Approval); 5-2 (DUNS Numbers and Grant Platform User Accounts); and 5-3 (Subrecipient and Contractor Determinations).

### 2. DEFINITIONS

**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. Contractor relationships are subject to Pima County Procurement Code.

**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 Lead** – An individual who serves as the point of contact for the grantor agency and GMI, and is responsible for grant implementation, with technical assistance from GMI.

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**Grantor** – A Federal, state, local, private, or other entity which makes any type of award meeting the definition of grant provided above.

**Program Income** – Income that is generated through programs or activities directly funded by a grant.

**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

- 3.1. Upon notification of grant award, County Entities must notify the County Administrator and GMI.
- 3.2. County Entities must partner with GMI to develop and execute immediate post-award activities, including:
  - 3.2.1. Reviewing all grant agreement terms and conditions, including the original solicitation, County's proposal, notice of award, grant agreement, standard and special terms and conditions, and all regulations and policies referenced in these.
  - 3.2.2. Negotiation of grant budget and deliverables.
  - 3.2.3. Board of Supervisors agenda item materials for acceptance and/or review.
  - 3.2.4. Grant program accounting set-up, including, but not limited to: entering the award in the Advantage Grants Lifecycle Management system, and determining the programs, periods, and expenditures to be tracked under the grant award.
  - 3.2.5. Treatment of program income, if applicable.
- 3.3. Both the County Entity and GMI will assign Lead(s) for each grant.
  - 3.3.1. Upon acceptance by the Board of the Supervisors, the County Entity and GMI Leads will collaborate to:
    - 3.3.1.1. Set up an implementation work plan with deliverables and due dates.
    - 3.3.1.2. Develop procedures for the grant, based on grant deliverables and compliance elements. These procedures may reference existing County or departmental procedures.
    - 3.3.1.3. Convene subrecipients and other partners.
    - 3.3.1.4. Communicate time and effort reporting for employees and supervisors assigned to the grant.
    - 3.3.1.5. Develop subrecipient agreements according to AP 5-3

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Form available on GMI intranet:

- Checklist for Determining Subrecipient vs. Contractor Relationship

- 3.3.1.6. If the grant includes contracted services, work with Procurement to procure these services.
- 3.3.1.7. If the grant includes any capital equipment, secure any required permissions from the funder prior to acquisition under the appropriate Board of Supervisors Procurement Policy.
- 3.3.1.8. Set up equipment inventory, management, maintenance, and disposal protocols in accordance with grant requirements.
- 3.3.1.9. Establish regular grant team meetings with programmatic, fiscal, and subrecipient staff.
- 3.3.1.10. Establish a schedule for completing programmatic/progress reports and expenditure reports with planned-to-actual review of performance and expenditure targets by grantee Entity staff and GMI prior to submittal.
- 3.3.2. Both the County Entity Lead(s) and GMI Leads will review each expenditure made under the grant to ensure the cost is allowable, reasonable, and allocable to that grant.
- 3.3.3. The County Entity Lead(s) will review timesheets to ensure that staff working on the grant are certifying their time and effort appropriately and correctly, and coordinate with other entity supervisors.
- 3.3.4. GMI Leads will prepare financial reports, submit them to the grant Lead for review and approval, and submit the approved reports to the grantor.
- 3.3.5. The County Entity Lead(s) will consult with GMI on requests to the grantor to amend or extend the Grant Agreement, including budget amendments.
- 3.3.6. The County Entity Lead(s) will be responsible, in collaboration with GMI Leads, for submitting mandatory disclosures and notifications to the grantor as required.
- 3.3.7. At least 60 days following completion of the Period of Performance, GMI Leads will initiate a Grant Closeout Checklist. This will verify completion of all obligations under the award.
- 3.3.8. Following grant closeout, both the County Entity and GMI will retain grant-related records as required by the grant and applicable state law.
- 3.3.9. Both County Entity Leads and GMI Leads will support post-closeout audit of the grant by the grantor and the State Auditor General.