

RESOLUTION NO. 2015-07

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE TOWN OF FOUNTAIN HILLS, ARIZONA, ADOPTING THE TOWN OF FOUNTAIN HILLS GRANT ADMINISTRATION POLICY.

WHEREAS, the Mayor and Council of the Town of Fountain Hills (the "Town Council") has determined that it is in the best interests of the citizens of the Town of Fountain Hills to establish written policies and procedures to be used when applying for, accepting and administering federal, state, county, private foundation and corporate grants, sponsorships and donations; and

WHEREAS, the Town Council desires to adopt the Town of Fountain Hills Grant Administration Policy (the "Grant Administration Policy").

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE TOWN OF FOUNTAIN HILLS, ARIZONA, as follows:

SECTION 1. The recitals above are hereby incorporated as if fully set forth herein.

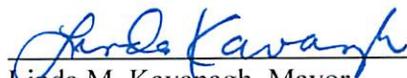
SECTION 2. The Grant Administration Policy is hereby adopted in substantially the form and substance attached hereto as Exhibit A.

SECTION 3. If any section, subsection, sentence, clause, phrase or portion of this Resolution or any part of the Grant Administration Policy adopted herein by reference is for any reason to be held invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions thereof.

SECTION 4. The Mayor, the Town Manager, the Town Clerk and the Town Attorney are hereby authorized and directed to take all steps and to execute all documents necessary to carry out the purpose and intent of this Resolution.

PASSED AND ADOPTED BY the Mayor and Council of the Town of Fountain Hills, Arizona, March 5, 2015.

FOR THE TOWN OF FOUNTAIN HILLS:


Linda M. Kavanaugh, Mayor

REVIEWED BY:


Kenneth W. Buchanan, Town Manager

ATTESTED TO:


Bevelyn J. Bender, Town Clerk

APPROVED AS TO FORM:


Andrew J. McGuire, Town Attorney

EXHIBIT A
TO
RESOLUTION NO. 2015-07

[Grant Administration Policy]

See following pages.

Town of Fountain
Hills

Grant Administration
Policy

Issued March 5, 2015

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INTRODUCTION

The purpose of this grant administration policy is to establish uniform policies and procedures throughout the Town of Fountain Hills (the “Town”) to be used when applying for, accepting and administering federal, state, county, private foundation and corporate grants, sponsorships and donations. This document describes the grant administration process and identifies the roles and responsibilities of the Department Directors, Risk Management, Information Technology (“IT”), Finance and the Grant Project Manager. Definitions of certain terms can be found in Section III.

Although this policy identifies certain departments and employees that are routinely involved in the administration of grants, this policy applies to all department employees who are programmatically or fiscally responsible for developing, implementing, administering, or reporting federal and other grant activity. It is essential for all Town departments and employees to adhere to the applicable provisions of federal, state and local laws, regulations, contracts and grant agreements, as well as the grant policies and procedures outlined in this policy, while administering grant-funded programs. First, noncompliance may result in Town sanctions and liabilities. Second, incorrect or irreconcilable financial activity and account balances recorded in the Town’s financial management system may adversely affect the integrity of Town financial reports and financial information reported to the grantor and the public. Third, it is necessary to help ensure that the Town is receiving the greatest possible economic benefit from the programs it administers.

This policy is divided into three sections: Section I outlines the Town’s purpose for submitting grants and the Town’s overall fiduciary and administrative responsibilities including matching funds; Section II highlights the roles and responsibilities for each individual involved in administering grants; Section III contains a glossary of the relevant terms and resources. Appendices of internal forms and resources follow the glossary.

Due to the complexity of grants, other documents should be used in tandem with this policy. In most instances, the grantor will provide specific guidance; in some occasions you will need to consult with other members of the management team and/or the Finance Division to research particular information.

Grant trainings associated with writing and monitoring grants are optional but highly recommended.

SECTION I: PURPOSE AND TOWN RESPONSIBILITIES

1.1 Purpose for Submitting Grants

A grant is a contribution or a gift of cash or other assets to be used or expended for a specified purpose, activity, project or facility. Grant agreements usually specify the maximum amount of funding, the scope of work to be done, the grant period (e.g. single or multi-year), and any special conditions applicable to the program. The Town's purpose for the use of federal, state, county, private foundation and/or corporate grants (including sponsorships and donations) is to maximize external financial resources while protecting the integrity of the Town's operational budget and long-term financial conditions. Therefore, all Town employees will only apply for grants that further Town Council's goals and objectives, and support projects and programs that are consistent with the mission and priorities of the Town and its departments. To ensure that this occurs, all departments are required to submit a Grant Priority Form along with their annual budget requests (Appendix A). (Note: This process typically should take place during the Town's budget process but can occur at any time during the year.) Department Directors are also responsible for approving all grants prior to submission to the Finance Division for Town Manager's signature or electronic submission to the funding agency.

1.2 Fiduciary Responsibilities

A. Internal Controls.

When any employee of the Town of Fountain Hills applies for or accepts a grant, Town management assumes the responsibility for administering the grant and the financial assistance in accordance with the provisions of all applicable laws, regulations, contracts and grant agreements. In order to ensure that the Town fulfills its fiduciary and administrative responsibility, the Town management has established a system of internal controls designed to provide reasonable assurances regarding the achievement of Town-wide and program-level objectives in the following categories:

1. Effectiveness and efficiency of operations
2. Reliability of financial and programmatic reporting
3. Town compliance with applicable laws, regulations contracts, grant agreements and other compliance requirements
4. Transactions are properly accounted for and recorded

5. Transactions are executed in compliance with all laws, regulations and provisions of contracts and grant agreements that could have a material effect on federal and other programs
6. Funds, property and other assets are safeguarded against loss from unauthorized use or disposition

To enhance cash management practices, it is the Town's preference to receive funding on a cost reimbursement basis, unless specifically prohibited by the grantor. This basis minimizes the Town's responsibility with respect to monitoring and administering interest earnings from grants.

All requests for reimbursement shall be coordinated with the Finance Division. The Town's preferred method of reimbursement is electronic funds transfers ("EFT"). However if EFT is not available, reimbursement checks shall be made payable to the Town of Fountain Hills and mailed to:

***Town of Fountain Hills
c/o Finance Division
16705 E. Avenue of the Fountains
Fountain Hills, Arizona 85268***

In order to minimize foregone interest and to improve the Town's cash flow, the Grant Project Managers and/or Finance Division shall draw down grant funding at least monthly, when applicable. The Finance Division shall review grant revenues and expenditures at least quarterly to verify that drawdowns are performed timely.

B. Authority and Sources of Guidance

This policy supplements the Town's accounting procedures and serves as the general framework for departments to follow when applying for grants, negotiating the terms and conditions of grant agreements and administering grants. The policy is intended to provide consistent guidelines for grant administration to ensure optimum financial and administrative arrangements for the Town.

In addition, the following is a list of federal circulars and publications that provide grant management guidance. Each of these publications is available on the Internet and a brief description of the guidance can be found in the Appendix B of this policy.

1. Single Audit Act of 1984 and Amendments of 1996
2. Grants Management Common Rule http://www.whitehouse.gov/omb/grants_chart/

3. Federal OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments (relocated to 2 CFR, Part 225)
http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf
4. Federal OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institution of Higher Education, Hospitals, and Other Non-Profit Organizations (relocated to 2 CFR, Part 215)
<http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf>
5. Federal OMB Circular A-122, Cost Principles for Non-Profit Organizations (relocated to 2 CFR, Part 215)
http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a122.pdf
6. Federal OMB Circular A-133, Audits of States, Local Governments, and Organizations
http://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133_revised_2007.pdf
7. Federal OMB Circular A-133, Compliance Supplement
http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2012
8. Catalog of Federal Domestic Assistance (CFDA) <https://www.cfda.gov/>
9. Code of Federal Regulations (CFR) <http://www.gpoaccess.gov/cfr/index.html>

C. Matching Funds

The Town Council established a Grant Fund (special revenue fund, fund 400) to account for unanticipated grant application opportunities. Requests for matching funds (typically General Fund money) required as a condition of the grant application should be sent to the Finance Division for approval of availability prior to the decision to apply is made and as soon as the matching estimate is known. No project will be eligible for matching funds without approval from the Town Manager and, when necessary, the Town Council.

If the grant project is assigned to the Grant Fund for Finance Division tracking purposes, matching funds required for future years on an annually renewable grant (e.g. COPS Universal Hiring) must be estimated and budgeted by the initiating department during the annual budgeting process. For example, there are federal, state and county grant programs that typically issue requests for proposals every year. The need for matching funds for these predictable opportunities must be estimated and budgeted by the department.

In some cases, future grant opportunities can be predicted because enabling legislation has been passed. Community Oriented Policing Services (COPS), Community Development Block Grant (CDBG), HOME Investment Partnerships, Federal Transit Administration (FTA), Local Transportation Assistance Fund (LTAF) and Homeland Security are examples of enabling legislation that preceded the implementation of these grant programs. Whenever possible, departments should plan for these types of opportunities to ensure that budget appropriation authority is adequate and potential matching funds are addressed during the annual budgeting process.

If the department submits a supplemental request for matching funds for the above types of grant opportunities, the department should notify the Finance Division for assistance. If the request is approved, budget authorization for the supplemental amount will be placed in the Grant Fund and will be designated for the respective departments.

1.3 Administrative Responsibilities

Grant funding should be considered primarily for one-time or time-limited projects (such as capital improvements) that do not have a significant long-term effect on the ongoing operating budget. Grants also may be appropriate start-up funding mechanisms for priority projects already identified in a department's Grant Priority Form. Grants should not be used as the primary financing mechanism to create new ongoing programs or services or to add unbudgeted positions unless specifically approved by the Town Manager.

Any grant application that requires the guaranteed continuation of grant-funded positions or graduated match resulting in full financial responsibility subsequent to termination of the grant, or that directly increases the Town's ongoing operating cost, must be reviewed by the Town Manager and the Finance Division. The Town Manager, or Town Council (if the grant award meets or exceeds \$30,000), shall have the final say on grant activities. In some instances, the Town Manager may request Town Council input regarding a grant application submittal. If a Town Council meeting is needed, but cannot be scheduled prior to a crucial grant application deadline, the Town Manager may authorize the department to apply for the grant so that it does not miss the crucial deadline. However, the department must withdraw the grant application if the Town Council later decides not to submit the grant.

The Town may cosponsor, serve as fiscal agent, or join with multiple sponsored community-based consortia or other jurisdictions when the Town Council determines it will benefit Town residents. The Town shall not act solely as fiscal agent for non-profit entities without consultation with the Finance Division and specific direction and approval from the Town Manager after his consultation with the Town Attorney.

A. Developing Appropriate Grant Projects

Grant writing and grant management take a considerable investment of time and resources. When considering whether to apply for a particular grant, the initiating department must consider the following:

1. Will the grant help the Town attain an objective and secure infrastructure investments that fit into the Town's and the department's priorities?
2. Is the grant-supported service a high priority for the Town Council, the department and the public as evidenced by planning documents, inclusion in the Capital Improvement Plan ("CIP"), local resources commitment, or other documentation that identifies the need and service levels?
3. Can other community agencies be identified that provide or could provide the same or similar services, and can it be articulated why the Town is a more efficient and cost-effective provider?
4. Can this grant obtain sufficient budget appropriations and, if matching funds are required, will that match come from the department's operating budget, authorized CIP funding or another budget source?
5. If administrative and indirect costs, as well as department resources (Finance, Risk Management, etc.) are involved, have these departments/divisions been consulted and are the costs eligible for grant reimbursement?
6. What is the likely funding source for continuing the project/program or services, or is there a plan for terminating the grant-supported activities?
7. Is the benefit derived from the grant sufficient to justify the cost involved in administering the grant, or will the grant leverage other funding sources and/or foster more creative public-private partnership arrangements?
8. Is this item from a sole source vendor or can other companies supply a competitive price?
9. Does the program have special property, liability or other insurance requirements? If so, has the incremental cost of such requirements been factored into the overall cost-benefit analysis?

10. Can the program be housed within existing space? If not, are requirements for additional or renovated space and equipment consistent with the Town's plans and available funding?
11. Will the program require additional staff? If so, is the staffing increase in conformity with the Town's plans, budget and available monies?
12. Is the proposed program budget sufficiently detailed (i.e., have all the direct and indirect costs such as salaries, ERE (employee-related expenses), supplies and materials, equipment, travel, computers, consultants, allocated administrative and internal service costs been identified and accounted for)?
13. If the grant is a donation, is it coming from an agency that has already donated to another town? If so, should you wait to request a donation or should you allow another department to apply from this source?

Please see the Grant Check List (Appendix D) for more details.

B. Grant Application Process

The Town has a methodology to help track grants and ensure that programs are managed and meet program compliance. The grant application process consists of 12 steps that require the involvement of various staff members. The following steps are a general outline of the process, with individual responsibilities relating to the process set forth in Section II.

1. **Finding Grant Opportunities.** The Department Directors and/or staff seek grant opportunities for the Town. This process is done through various search engines to which the Town has access. Town staff also has access to grant opportunities as they often become available in their specific lines of work. Prior to submitting the grant application, the applicant is required to obtain confirmation of the availability of any matching funds from the Finance Division as well as Town Manager approval (and Town Council approval if the grant award meets or exceeds \$30,000).
2. **Logging the Grant.** Once an opportunity has been found, the applicant will notify the Finance Division, which will log the grant into an Excel file. During this step, a grant number will be assigned.
3. **Invitation to Pursue Grants.** Once the approval is obtained and a grant is logged, the applicant has permission to pursue the grant.

4. **Filling in the Form (Appendix A) to Pursue a Grant.** The person pursuing the grant automatically becomes the “Grant Project Manager” for that grant. The Grant Project Manager fills in information pertaining to the project’s ability to meet Town Council’s goals and the Town’s ability to meet all maintenance and reporting requirements and financial obligations.
5. **Internal Approvals.** Once the form is complete, the Grant Project Manager will submit it to his/her Department Director. If the Department Director determines the grant meets the requirements of this policy, he/she will approve it and route it to Finance, Risk Management, IT and any other necessary departments/divisions for internal approval.
6. **Writing the Grant.** The Grant Project Managers should always attempt to fill out the grant application first. They are the experts on the topic and should provide as much information as they can about the project for which they are seeking funding.
7. **Legal Review.** The Grant Project Manager should prepare and submit to the Town Attorney a Request for Legal Services according to the legal request process established by the Town. The Town Attorney will review the grant application and send it back to the Grant Project Manager with any required changes. The Grant Project Manager will obtain the Town Manager signature on the cover letter before submitting the grant application.
8. **Town Council Approval.** Town Council approval, by Resolution, is required when (i) the grant requires it, (ii) the grant meets or exceeds \$30,000 or (iii) the grant requires a contractual agreement. In those cases, the Grant Project Manager will generate an Agenda Action Form and request updates and approval from the Department Director. The Grant Project Manager, in accordance with Town Council agenda packet deadlines, will take the item to the next available Town Council meeting. The Grant Project Manager also will ensure that all awarded grant contracts, regardless of the amount, are approved by the Town Attorney. The Grant Project Manager must follow all other procurement and grant contract requirements. These requirements include a staff report for bids on grant-funded equipment and carrying over funding and appropriations to the next fiscal year when necessary.
9. **Grant Approval Notification.** The Grant Project Manager shall be responsible for tracking all awarded and denied grants. Once a letter for approval has been received, the Grant Project Manager will submit all of the necessary documents to the Finance Division who will enter the data into the grant management system.

- 10. Implementation of the Grant.** It is the responsibility of the Grant Project Manager to implement the grant in accordance with the contract and all applicable laws and regulations. During this process, the Grant Project Manager should work with the Finance Division and the granting agency. The Grant Project Manager will be responsible for ensuring that all compliance items are met. The Grant Project Manager should be aware of federal laws and regulations as they relate to the grant project and should seek legal advice from the Town Attorney if the Town's obligations are unclear.
- 11. Reporting Documents.** All reports are to be completed by the Grant Project Manager on time and in conjunction with the Finance Division (when necessary). Copies of reports shall be retained by the Grant Project Manager and Finance Division and retained for the time period specified in the current Town and/or State of Arizona ("State") approved record retention schedules or as indicated within the grant contract (whichever is longer).
- 12. Closing the Grant.** Grants will be closed only when a letter of completion or compliance has been obtained from the grantor. All grant activity should remain open until the funding has been fully spent down. Grant Project Managers should not close any grants without the written consent from the Finance Division. This process will help safeguard against any programmatic and/or financial discrepancies. Once the grant is closed, the Finance Division will send a hardcopy of all the grant activity to the Grant Project Manager to be retained until the date at which the records can be destroyed according to the current Town and/or State approved record retention schedules or as indicated within the grant contract (whichever is longer).

SECTION II: INDIVIDUAL ROLES AND RESPONSIBILITIES

In an effort to ensure that all grants are administered in a consistent manner, the following policies have been designed to set forth the role of each staff member that is involved with the grant projects.

2.1 Town Attorney

The Town Attorney shall approve all contracts, grant agreements, memoranda of understanding, intergovernmental agreements and any other binding documents prior to signature from the Town Manager or Mayor. The legal request process established by the Town is to be followed.

2.2 Responsible Department

The “Responsible Department” is the department of the Grant Project Manager. The Responsible Department shall maintain all hardcopies of grant activities and shall maintain grant information for the time period specified in the current Town and/or State approved record retention schedules or as indicated within the grant contract (whichever is longer).

2.3 Department Director

- A. Department Directors are responsible for submitting a Grant Priority Form with their budget requests each year, if applicable, or as promptly as possible if their requests do not coincide with the timing of budget requests. The forms shall outline all of the programs and projects that the Directors would like to pursue during the fiscal year. Department Directors shall not approve any grant requests not included in the Grant Priority Form unless they have received the Town Manager’s approval.
- B. Directors should refer to the Grant Check List (Appendix D) before approving a grant.
- C. Department Directors are responsible for reviewing and approving grant requests that come from their department’s staff members. This review includes, but is not limited to, the grant requirements, implementation commitments and reporting requirements. Directors should not approve any grants that they do not have the financial and personnel resources to successfully administer.
- D. Department Directors shall approve or deny a grant request within three Town business days. If the Director is not available to approve a grant, he/she should assign an alternate staff person or his/her supervisor to conduct this duty.

- E. The Department Director shall forward any approved grant request to Finance, Risk Management, IT and any other necessary departments/divisions, as appropriate, for internal approval. If the grant request is not universally approved by the other departments/divisions, the Department Director, Finance Division and the other approving entity shall attempt to arrive at a resolution. If unsuccessful, the Department Director shall take his/her concerns to the Town Manager.
- F. Department Directors are responsible for assigning responsible staff members to serve as Grant Project Managers to oversee grants. If a Grant Project Manager leaves his/her employment with the Town, then the duty of the Grant Project Manager will be reassigned to another staff member. The transition of the Grant Project Manager should be conducted through written correspondence that includes the Town Manager and the Finance Division.
- G. Department Directors will work with the Finance Division when there are issues with the Grant Project Manager's inability to successfully implement grant activities.

2.4 Grant Project Manager

A. Obligations Prior to Grant Submittal.

1. The Grant Project Manager is encouraged to attend at least one grant training program associated with writing and monitoring grants and one Finance Division meeting prior to submitting a grant application.
2. Grant Project Managers should seek out grant opportunities in their lines of work.
3. The Grant Project Manager shall not request to apply for a grant until he/she has reviewed the request for proposal thoroughly and considered the merits of the project as it relates to the Town's objections and reviewed the requirements related to the potential grant request.
4. The Grant Project Manager shall work with his/her supervisor and/or Department Director by having an informal conversation about the grant prior to submitting a request to pursue a grant.
5. Once the Grant Project Manager decides to apply for a grant, he/she shall notify the Finance Division and complete a Grant Project Profile Worksheet as thoroughly as possible. **INCOMPLETE FORMS ARE SUBJECT TO REJECTION.** The Finance Division will log the grant into an Excel file as part of

the grant management system. The Grant Project Manager should be prepared to provide the following information when requesting to apply for a grant:

- a. A project description that explains what the funding will be used for and how it will benefit the Town, including a detailed budget by revenue and expenditure. The Grant Project Manager should work with the Finance Division regarding any financial concerns.
 - b. Anticipated project cost, any ongoing or post-grant cost impact or revenues and the source of matching funds.
 - c. The Town Council/department goals the grant supports.
 - d. Identify if the grant will need to be supported by IT, if necessary.
 - e. Identify if the grant requires equipment purchases and/or maintenance.
 - f. Identify if the grant requires additional insurance.
 - g. Identify if other departments will be affected by the grant and include confirmation that the affected departments' directors support the grant.
 - h. The tentative timeline for the project implementation.
 - i. Identify any partners in the grant, including a support letter/resolution that refers to the partner's level of commitment.
6. The Grant Project Manager shall contact Risk Management for approval to submit grant applications that involve and/or require equipment training. The following is a list of questions that the Grant Project Manager should be prepared to answer:
- a. Will you be purchasing any equipment that requires training?
 - b. If so, what type of equipment?
 - c. If so, what type of training is necessary?
 - d. Will the equipment require the Town to purchase additional insurance to fulfill the grant requirements and obligations? If so, forward a copy of those requirements to Risk Management.

- e. Have you allocated training cost into your grant?
 - f. Will ongoing trainings be necessary?
 - g. If so, who will provide the trainings?
7. The Grant Project Manager shall contact IT for approval to submit any grants that will involve computer equipment and/or server space. The Grant Project Manager shall meet with IT to ensure that the budget allocations are appropriate and that computer technology is compatible. This contact must be done in person while pursuing the grant. The Grant Project Manager shall put detailed information in the form so that IT can make an informed decision. Upon the receipt of the computer equipment, the Grant Project Manager shall follow up with IT to ensure that they are aware of any programmatic requirements associated with the grant. The following is a list of questions that the Grant Project Manager should be prepared to answer:
- a. Will any technology equipment be purchased with the grant?
 - b. If so, what type of equipment?
 - c. What is the life expectancy of the equipment?
 - d. How do you intend to pay for the replacement and repairs associated with the equipment?
8. The Grant Program Manager shall submit the grant request to the Administrative Services Division and the Town Attorney prior to submittal and prior to any required Town Council approval.
9. If Town Council approval is necessary for the submittal/approval of the grant, the Grant Project Manager will work with the Town Clerk to prepare a Town Council report, in accordance with the legal request process and Town Council agenda packet deadlines. Town Council packets are prepared one week prior to the first and third Thursday of the month.

B. Financial Obligations after Grant Award.

1. The Grant Project Manager shall notify the Finance Division about any grant awards and shall provide all documents associated with the grant to the Finance Division so that it may be recorded and entered.
2. The Grant Project Manager shall request revenue and expenditure budget costs for the grant award and anticipated expenditures from the Finance Division to ensure that the financial obligations of the grants are being accurately administered.
3. The Grant Project Manager is responsible for providing annual revenue and expenditure projections to the Finance Division to ensure that such projections are integrated into the Town's formal, annual budget process. Such projections must be submitted within the required budget process timelines.
4. If the Grant Project Manager receives a check, he/she must hand-carry it to the Finance Division on the same business day. If the check cannot be transported in the same day, it must be safely locked up and delivered to the Finance Division on the next business day.

C. Administration Obligations after Grant Award.

1. All purchases with grant funding must be in accordance with the Town's procurement procedures, which include purchases using the Town's Procurement Card.
2. All purchases also shall be in accordance with the grant agreement. If any questions regarding purchasing arise, the Grant Project Manager shall contact the Finance Division to clarify the proper procedure.
3. The Grant Project Manager is responsible for ensuring that any in-kind match is documented and that grant documentation is retained with other grant-related records for the time period specified in the current Town and/or State approved record retention schedules or as indicated within the grant contract (whichever is longer). Program income, including revenue and earned interest as well as in-kind match, must be handled according to grant guidelines and OMB Circulars A-87 and A-102, if applicable.
4. The Grant Project Manager shall request to expend funds by the termination date noted on the grant agreement. Expenditures encumbered prior to the award date or

after the termination date may not be eligible for reimbursement. An extension of the grant may be requested in the event that the programmatic goals have not been met or funding remains. The request for extension should be coordinated with the Finance Division.

5. The Grant Project Manager shall be familiar with the programmatic and administrative requirements of the grant and shall comply with these requirements including the cost principles and administrative guidelines. Many grantors will provide this information in the application packet instruction and/or the award documents.
6. The Grant Project Manager is responsible for reporting requirements. Submissions of programmatic and financial reports shall be accomplished in accordance with the guidelines specified in the grant contract or agreement. The Grant Project Manager is responsible for program implementation, management, evaluation, documentation and ensuring compliance with contract financial and narrative and reporting requirements.
 - a. The Grant Project Manager shall be responsible for providing financial information to the Finance Division. This information must be provided as soon as possible and not less than one week prior to the reporting deadline. The Grant Project Manager shall review with the Finance Division the grant financial report due dates as soon as possible after the grant/project has been awarded. The Grant Project Manager also shall notify the Finance Division of upcoming reporting deadlines at least one week prior to the due date(s). The Grant Project Manager is responsible for reviewing the financial reports that are prepared by the Finance Division. If there are any discrepancies in the report, it should be brought to the attention of the Finance Division.
 - b. If the Grant Project Manager submits a financial or programmatic report, copies of that report shall be sent to the Finance Division within one week.
7. The Grant Project Manager shall notify the Finance Division about any scheduled audits or site visits as soon as the Town or Grant Project Manager is notified of such audits and site visits.
8. The Grant Project Manager shall work closely with the Finance Division when closing out grants. Project closeout activities shall include completion of the final programmatic and financial reports, determination of obligated and unobligated cash balances and completion of necessary accounting entries. All project files

shall be combined and retained by the Grant Project Manager. The Grant Project Manager shall not certify that a grant is closed without written consent from the Finance Division.

9. The Grant Project Manager shall inventory equipment purchased for his/her area of control and submit inventory records to the Finance Division. Records for equipment, non-expendable personal property and real property shall be retained for the time period specified in the current Town and/or State approved record retention schedules or as indicated within the grant contract (whichever is longer).

2.5 Finance Division

- A. The Finance Division shall use the itemized budget prepared by the Grant Project Manager to support general ledger account and budget set up for the grant.
- B. The Finance Division shall be available to assist with setting up detailed budget plans when necessary.
- C. The Finance Division shall work with the Grant Project Manager to determine the budget and account code for the respective grants.
- D. The Finance Division will base all requested funds on the expenditures already incurred or amounts required for immediate disbursement.
- E. The Finance Division shall maintain records of revenues requested and received by the Town and reconcile the grant receivable accounts.
- F. If the Finance Division receives a check from a grantor, it shall notify the Grant Project Manager promptly.
- G. The Finance Division shall not commingle grant funding even if there are multiple grants for the same project. The Finance Division will establish separate records for each project to avoid commingling of project funds.
- H. The Finance Division shall be responsible for coordinating the financial reporting of all grants and preparing a majority of financial reports submitted to grantor agencies by the Grant Project Manager.
- I. The Town's Finance Director shall schedule, monitor and ensure timely completion of all required audits in conformity with guidelines required by the Single Audit Act as amended, if applicable.

- J. The Finance Division shall have primary oversight responsibility for stewardship of Town capital assets, but individual departments shall assist the Finance Division. In addition, the individual departments shall be responsible for stewardship for all noncapital Town assets that are determined to be high-risk-of-loss assets.
- K. The Procurement Agent as designated in the Town's Procurement Policy will work with the Grant Project Manager to ensure that procurement procedures have been properly followed.

2.6 Information Technology Division

- A. IT shall approve or deny a grant request promptly.
- B. IT shall work with the Grant Project Manager when requesting computer and/or technology equipment.

2.7 Administrative Services Division

- A. The Administrative Services Division shall assist the Grant Project Manager with grant funded positions.
- B. All grant funded positions will be defined as limited appointments.
- C. The Administrative Services Division will update the Town's Policies and Procedures relating to grant-funded positions as necessary to comply with federal grant requirements.
- D. The Administration Services Division shall work with the Grant Project Manager to ensure that all insurance requests are appropriate for the Town.
- E. The Administration Services Division shall work with the Grant Project Manager to determine appropriate training for equipment purchases, if applicable.

2.8 Other Affected Departments/Divisions

Other departments/divisions shall make themselves available to consult with the department seeking grant funding. This consultation will be coordinated by the Grant Project Manager when necessary.

SECTION III: GLOSSARY

Accounts Payable Check Processing: Accounts Payable processes vendor payments and prepares checks for signature. The general ledger is automatically updated by the Accounts Payable module of the general ledger accounting system at the time of entry. Accounts Payable checks are signed electronically. Accounts Payable sends the checks to the vendor. The electronic record copy of each purchase order is maintained in the Accounts Payable system.

Advanced Funding: A funding technique where program monies are received in advance of expenditures. Common forms of advance funding include checks and electronic fund transfers.

Auditee: Any nonfederal entity that expends federal awards which must be audited under the Single Audit Act, as amended.

Auditor: A public accountant or a federal, state or local government audit organization that meets the general standards specified in generally accepted government auditing standards (GAGAS).

Audit Finding: Deficiencies the auditor is required to report in the Schedule of Findings and Questioned Costs.

Block Grant: Grants which combine funding for a broad purpose such as community development or energy efficiency. Community Development Block Grants are one of the most famous block grants.

Categorical Grants: Grants awarded for a specific, limited purpose such as a library grant or a construction grant.

Catalog of Federal Domestic Assistance (CFDA) Number: The number assigned to a federal program in the CFDA. If a grant award includes federal funds, then the CFDA number for those funds must be determined for proper disclosure on the federal Schedule of Expenditures of Federal Awards. Visit: <https://www.cfda.gov/>

Town Council Action: The process by which Town Council members review projects to determine if they will approve or deny the Town's involvement. All grants that require a Resolution (as noted in the application/approval package) shall go to Town Council. All grants that are equal to or in excess of \$30,000 also are required to have Town Council action.

Commingling of Funds: The Town is prohibited from commingling its funds with grant/project awards of federal or other agencies. Each award must be accounted for separately. The Town is also prohibited from commingling funds on either a program-by-program basis or a project-by-

project basis. Funds specifically budgeted and/or received for one program or project may not be used to support another. The Town's financial management system and supporting records must demonstrate that such funds were not commingled.

Common Rule: On March 12, 1987, the President directed the federal grant making agencies to issue a grants management common rule to adopt government wide terms and conditions for grants to states and local governments. In 1988, OMB revised Circular A-102 to include guidance to federal agencies on matters not covered by the grants management common rule. The attachments to Circular A-102 were replaced by the grants management common rule. OMB maintains a chart which includes the locations of federal agency codifications of the grants management common rule. It is important for a grantee to review the regulations of their federal awarding agency. Visit: http://www.whitehouse.gov/omb/grants_chart/

Competitive Bidding Proposal: Purchases of \$30,000 or more require a competitive bidding procedure. To begin this process, departmental personnel shall write a scope of work and/or specifications and provide to Procurement for preparation of the Request for Proposals/Request for Statements of Qualifications and/or Invitation for Bids, as applicable. Procurement sends these documents to the Town Attorney for the final solicitation documentation through the legal request process established by the Town.

The bids are then given to the appropriate department for review. Proposals and Statement of Qualifications go through an alternative process. Upon selection of the successful vendor, the bid/proposal/statements of qualifications are provided to the Town Clerk's Office together with a Contract Submittal Form. The contract documents are provided to and prepared by the Town Attorney for submittal to the Town Council for approval. The Town Clerk's Office processes and distributes the executed contract documents. The Finance Division maintains the electronic contract documents. Once approved by the Town Council, department personnel issue the requisition for purchase order. Procurement issues the purchase order.

Cooperative Agreement: Similar to grants except that the awarding agency is usually substantially involved in the activity funding by the program.

Cost Reimbursement: A funding technique where the Town must submit periodic claims or draws down funding under letter(s) of credit for allowable program expenditures already incurred. The awarding agency reimburses the Town for eligible expenditures up to the maximum amount specified in the grant agreement.

Cognizant Agency: The federal agency responsible for reviewing, negotiating and approving cost allocation plans or indirect cost proposals developed under federal OMB Circular A-87 on behalf of all federal agencies.

Extensions: A request from the grantor for more time to spend down funding and or complete programmatic goals. Requests for extensions are normally required prior to the grant ending date.

Federal Award: Federal financial assistance and federal cost-reimbursement contracts that non-federal entities receive directly from the federal awarding agencies or indirectly from pass-through entities.

Federal Awarding Agency: The federal agency that provides an award directly to the recipient.

Federal Financial Assistance: Assistance that nonfederal entities receive or administer in the form of grants, loans, loan guarantees, property (including donated surplus property), cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations and other assistance.

Federal Funding Percentage: The percentage of grant award that is federally funded.

Federal OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments (relocated to 2 CFR, Part 225): This circular establishes principles and standards for determining costs for federal awards carried out through grants, cost reimbursement contracts and other agreements with state and local governments and federally-recognized Indian Tribal governments. Visit:

http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf

Federal OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments Common Rule: This circular establishes consistency and uniformity among federal agencies and federal grantees and sub-grantees (sub-recipients) in the management of grants and cooperative agreements with state, local and federally-recognized Indian Tribal governments. *(Please be aware that the federal awarding agency's Implementing Rules may have administrative requirements that differ from the Common Rule requirements. Therefore, it is imperative that the Grant Project Manager review the federal agency's Implementing Rules to ensure that the Town is in compliance with the applicable administrative requirements. The Implementing Rules are outlined in the applicable Code of Federal Regulations.)* Visit:

<http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a102/a102.pdf>

Federal OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (relocated to 2 CFR, Part 215): This circular sets forth standards for obtaining consistency and uniformity among grantees and sub-grantees (sub-recipients) in the management of grants and cooperative agreements with institutions of higher education, hospitals and other non-profit organizations. Visit:

<http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf>

Federal OMB A-122, Cost Principles for Non-Profit Organization (relocated to 2 CFR, Part 215): This circular establishes principles and standards for determining the costs of federal grants, contract and other agreements with non-profit organizations. The principles are designed to provide that the federal government bears its fair share of costs except where restricted or prohibited by law. Visit:

http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a122.pdf

Federal OMB A-133, Audits of State, Local Governments, and Non-Profit Organizations: This circular is issued pursuant to the Single Audit Act of 1984, P.L. 98502, and the Single Audit Act Amendment of 1996 P.L. 104-156. It sets forth standards for obtaining consistency and uniformity among federal agencies for the audit of states, local governments and non-profit organizations expending federal awards. Visit:

http://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133_revised_2007.pdf

Federal OMB A-133 Compliance Supplement: The Compliance Supplement is based on the requirements of the Single Audit Act Amendments of 1996, as amended, and 1997 revisions to OMB Circular A-133, which provided for the issuance of a Compliance Supplement to assist auditors in performing the required audits. *(While the Supplement is intended to provide a tool to both federal grantor agencies and auditors in setting forth the important provisions of federal assistance programs, it also provides guidance to recipients of federal assisted programs. It includes program objectives, procedures, and compliance requirements.)* Visit:

http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2012

Grant Fund: A fund created by the Town Council (Special Revenue Fund – Fund 400) to provide accounting for grant opportunities that arise during each fiscal year.

Grantor Agency: The federal, state, local or private agency or organization that provided the grant funding and/or grant funding oversight.

Grant Award Budget: The budget for the awarded grant that is based on the amount and breakdown of the award. The budget may be for less than, equal to, or greater than one year.

Grant Award Period: The period of time for which the grant is awarded.

Grant Contract: A contract that defines the grant's requirements and restrictions. The Grant Project Manager shall provide the Finance Division a complete, approved signed copy of each grant contract.

Grant Description: Description of the grant or contracted services.

Grantee: The organization that receives a grant directly from the grantor agency and assumes legal and financial responsibility and accountability both for the awarded funds and for the performance of the grant-supported activity.

Grant Management System: The Town's data collection system for grants that provides information about grants utilized by the Town, from the initial information stage during the grant application process to the tracking of proceeds and expenditures after the grant is awarded and accepted. The system might consist of an integrated solution or a combination of an Excel file for the initial stage and MUNIS for tracking after the grant award.

Grant Number: At least one grant number must be assigned to uniquely identify and track each grant award except for federal grants. All federal grants must be identified and tracked using two external grant numbers: (1) CFDA number assigned by the federal awarding agency and (2) grant/contract/IGA number assigned by the grantor or pass-through agency. The Town also uses an internal numbering system for grants.

Grant Priority Form: An internal form that accompanies each department's budget request at the beginning of each fiscal year or whenever a grant becomes available. Departments must follow their priority list when considering the submittal of grants.

Grant Project Manager: The person managing the grant and responsible for compliance with the terms of the applicable grant including the appropriate records retention.

Grants: A grant is a contribution or gift of cash or other assets to be used or expended for a specified purpose, activity, project or facility. Grant agreements usually specify the maximum amount of funding, the scope of work to be done, the grant period (e.g., single or multi-year) and any special conditions applicable to the program.

Indirect Costs: Those costs incurred for a common or Town-wide objective that benefits more than one grant program or project. Such costs are not readily assignable to the cost objective specifically benefited.

In-Kind Contributions: Contributions in the form of goods and/or services rather than in cash.

Invoice Process: Original invoices are sent directly to Accounts Payable. Copies of invoices are sent to the respective department for approval of payment. The payment request is accomplished based on the purchase order number that was previously approved by the general ledger accounting system. Copies of the check register reports are maintained in Accounts Payable and are submitted for approval to the Finance Director, Town Manager, Town Clerk and Mayor.

Lead Agency: The agency that will be responsible for assuring that compliance of grant requirements when multiple agencies are involved in a grant.

MUNIS: The Town-wide financial management and accounting software system administered by the Finance Division. The MUNIS general ledger and related records represent the Town's official financial records and, therefore, all program financial activity and related account balances must be recorded in the general ledger. (If the Grant Project Manager maintains program financial activity and account balances information outside of MUNIS, the Grant Project Manager must ensure that the supplemental records reconcile to MUNIS.)

One-time Grants: Funding from a grantor agency that is provided for a limited duration for a specified project and/or program.

Ongoing Grants: The funding from a grantor agency which is expected to be provided year after year for a specified program or project.

Partnership Grants: Grants which require a binding agreement with another agency for the purpose of implementing a comprehensive program. The Town may co-sponsor, serve as fiscal agent or join with multiple sponsored community-based consortia or other jurisdictions when clear public benefit to Town residents can be demonstrated. The Town shall not act solely as fiscal agent for non-profit entities without specific direction and approval from the Town Manager and Town Attorney and in consultation with the Finance Division.

Pass-Through Grantor: An entity that provides awards to a sub-recipient in order to carry out a program.

Retention Period: Project records must be maintained for the required period after the awarding agency determined that the grantee has met all the project requirements and the project has been accepted for closeout. Records shall be maintained for a minimum of three years depending on the grant. All grant and project records shall be uploaded into the Town's system and hardcopies of the grant shall be maintained and retained according to the State's records retention schedules. All financial records will be housed in the Finance Division.

Shared Revenues: Revenues levied by another governmental entity and shared with the Town. They are generally distributed on a predetermined basis, often in proportion of the amount collected from within the state or county.

Signature of Authority: The Town Manager is the signature authority for all grant submittals and expenditures.

Single Audit Act of 1984 and Amendments of 1996: Requires governmental entities that spend over \$300,000 a year in federal awards to prepare a Schedule of Expenditures of Federal Awards (SEFA), which is audited annually. (OMB Circular A-133 revised this threshold to \$750,000 beginning in 2015.) This schedule is the responsibility of the Town Finance Division. OMB

Circular A-133 incorporates the requirements of the Single Audit Act. Copies of the Town's most recent Single Audit Reporting Package are available upon request from the Finance Division.

The Single Audit Act was enacted to ensure the accurate accounting of federal grant funds are in compliance with program standards. Material noncompliance findings cited in the Town's Single Audit Reporting Package, including failure to accurately report federal expenditures on the Schedule of Expenditures of Federal Awards, could result in loss of grant funding. Grantors are required to monitor their sub-recipient's single audit findings to help ensure that findings are corrected. The Finance Division and the department administering the grant ensures that grant activity is accurately reported on both the grantor financial reports filed with the grantor agencies and the Schedule of Expenditures of Federal Awards prepared by the Finance Division for the Town's Single Audit Reporting Package.

Supplanting: Under federal and state requirements, the Town may use federal or state funds to supplement and/or increase the level of funds associated with a project. A Town may not use federal or state funds to offset the cost of a project that has funding appropriation within the Town's budget. If a federal or state grant has supplanting requirements, the Town shall not deliberately use the federal/state funds to reduce federal, state or local funds already appropriated for the same purpose. If for some reason, a reduction in the program level of effort for funding occurs, the Town may be required to provide documentation that the reduction did not occur as a result of supplanting.

APPENDIX A: Grant Priority Template

Department:

Grant Request Project List for FY __ - __

Project Name	Council Goal/CIP Relation	Brief Description	Target Dates	Priority	Funding Amounts	Grant Opportunities	Alternative Plan if not funded by grants	Potential Project Manager

This form can be found on the Intranet under Document Library.

APPENDIX B: OMB Circular and Publications Descriptions

Catalog of Federal Domestic Assistance: This site provides a full listing of all federal programs available to state and local governments (including the District of Columbia); federally-recognized Indian tribal governments; territories (and possessions) of the United States; domestic public, quasi- public, and private profit and non-profit organizations and institutions; specialized groups; and individuals. Visit: <https://www.cfda.gov/>

Code of Federal Regulations (CFR): This site provides the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the federal government. Visit: <http://www.gpoaccess.gov/cfr/index.html>

Federal OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments (relocated to 2 CFR, Part 225): This circular establishes principles and standards for determining costs for federal awards carried out through grants, cost reimbursement contracts, and other agreements with state and local governments and federally-recognized Indian Tribal governments. Visit:

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Federal OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (relocated to 2 CFR, Part 215): This circular sets forth standards for obtaining consistency and uniformity among grantees and sub-grantees (sub-recipients) in the management of grants and cooperative agreements with institutions of higher education, hospitals and other non-profit organizations. Visit:

<http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf>

Federal OMB A-122, Cost Principles for Non-Profit Organization (relocated to 2 CFR, Part 215): This circular establishes principles and standards for determine cost of federal grants, contract and other agreements with non-profit organization. The principles are designed to provide that the federal government bears its fair share of costs except where restricted or prohibited by law. Visit

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http://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133_revised_2007.pdf

Federal OMB A-133 Compliance Supplement: The compliance supplement is based on the requirements of the Single Audit Act Amendments of 1996 and 1997 revisions to OMB Circular A-133, which provided for the issuance of a compliance supplement to assist auditors in performing the required audits. While supplement is intended to provide a tool to both federal grantor agencies and auditors in setting forth the important provisions of federal assistance programs, it also provides guidance to recipients of federal assisted programs. It includes program objectives, procedures, and compliance requirements. Visit:

http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2012

Grants Management Common Rule: On March 12, 1987, the President directed the federal grant making agencies to issue a grants management common rule to adopt government wide terms and conditions for grants to states and local governments. In 1988, OMB revised Circular A-102 to include guidance to federal agencies on matters not covered by the grants management common rule. The attachments to Circular A-102 were replaced by the grants management common rule. OMB maintains a chart which includes the locations of federal agency codifications of the grants management common rule. It is important for a grantee to review the regulations of their federal awarding agency. Visit:

http://www.whitehouse.gov/omb/grants_chart/

Single Audit Act of 1984 and Amendments of 1996: The Act requires governmental entities that spend over \$300,000 a year in federal awards to prepare a Schedule of Expenditures of Federal Awards (SEFA), which is audited annually. (OMB Circular A-133 revised this threshold to \$750,000 beginning in 2015.) This is the responsibility of the Town Finance Division. OMB Circular A-133 incorporates the requirements of the Single Audit Act. Copies of the Town's most recent Single Audit Reporting Package are available upon request from the Finance Division.

The Single Audit Act was enacted to ensure the accurate accounting of federal grant funds are in compliance with program standards. Material non-compliance findings cited in the Town's Single Audit Reporting Package, including failure to accurately report federal expenditures on the Schedule of Expenditures of Federal Awards, could result in loss of grant funding. Grantors are required to monitor their sub-recipient's single audit findings to help ensure that findings are corrected. The Finance Division and the department administering the grant ensures that grant activity is accurately reported on both the grantor financial reports filed with the grantor agencies

and the Schedule of Expenditures of Federal Awards prepared by the Finance Division for the Town's Single Audit Reporting Package.

APPENDIX C: Grant Project Profile Worksheet

GRANT PROJECT PROFILE WORKSHEET	
1. <i>In one sentence</i> , describe your project idea. What will you do? Where? With whom? When? And why?	
2. What <i>broad categories</i> of Town needs or opportunities does your project address? (Think in terms of general labels or frames.)	
3. Describe the <i>specific need or issue</i> in the Town that your project will address.	In our Town, the current situation is this:
4. What <i>specific changes or outcomes</i> do you intend to achieve in the Town as a result of your project?	We intend to achieve the following specific outcomes:
5. What are the <i>major steps</i> you will need to take to make these changes happen?	
6. What <i>resources</i> will you need to accomplish these steps? (people, equipment, materials, training, supplies, services, other Town departments, etc.)	
7. Approximate total cost:	\$ _____ Match \$ _____
8. Who else has a vested interest in working with you as <i>partners</i> on this problem or opportunity?	
9. What information, tools, data, etc., will you use to decide whether your project succeeded?	
10. Who will be the grant project manager?	
Submitted By:	Date::
Telephone:	

This form can be found on the Intranet under Document Library.

APPENDIX D: Grant Check List

Project Name: _____ App. Due Date: ____ / ____ / ____

Department: _____ Contact Name: _____ Ext. # _____

I. Procedures for Developing and Submitting Grant Applications

- Confirm purpose of the grant project meets Town Council Strategic Plan Goals and Operational Priorities/department goals.
- Read and understand entire grant application to ensure that your department has the appropriate resources to comply with the grantor's requirements.
- Develop grant concept including estimated budget and expected funding sources approved by Department Director.
- Grant entered into the grant management system. This system includes project description, total cost, grant amount requested, source of funding, match, ongoing cost implications including additional staff, if any, special conditions and application due date.
- Consult with other affected departments (e.g. engineering if it is a construction project) who will support or have the capacity to implement your project.
- Town Attorney to review if Resolution is required prior to grant submittals.
- Obtain Town Manager's signature prior to grant application submittal.
- Prepare draft Council communication requesting authorization to apply and accept grant if necessary.
- Complete final review and editing (a pair of fresh eyes are best), making sure to check the application against the grantor's instructions or the RFP.
- Send copy of the signed application to the Grant Project Manager for archiving and distribution.

II. Procedures for Accepting Grant Awards and Post-Award Procedures

Congratulations! Now you need to:

- Whoever receives an award notice/notification should send a copy of the award notice/notification to Grant Project Manager for archiving and distribution to Finance. Grant Project Manager will forward a copy of the award agreement to the Finance Division with a completed contract/grant information sheet for tracking purposes.
- Set up a meeting with the Grant Project Manager and the Finance Division to reconcile the accounts associated with the grant. During this meeting, you will review the grant requirements and you will be responsible for meeting all of the grant requirements and the current Town and/or State approved record retention schedules.